



## Common Sense Initiative

**Mike DeWine**, Governor  
**Jon Husted**, Lt. Governor

**Carrie Kuruc**, Director

### Business Impact Analysis

**Agency, Board, or Commission Name:** Department of Natural Resources, Division of Oil and Gas Resources Management

**Rule Contact Name and Contact Information:**  
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**Regulation/Package Title (a general description of the rules' substantive content):**  
Five Year Rule Review Filing for 1501:9

**Rule Number(s):** See Attachment 1

**Date of Submission for CSI Review:** August 13, 2020

**Public Comment Period End Date:** August 31, 2020

**Rule Type/Number of Rules:**

New/\_\_\_ rules

No Change/\_55\_ rules (FYR? \_Y\_)

Amended/\_4\_ rules (FYR? Y)

Rescinded/\_\_\_ rules (FYR? \_\_\_)

The Common Sense Initiative is established in R.C. 107.61 to eliminate excessive and duplicative rules and regulations that stand in the way of job creation. Under the Common Sense Initiative, agencies must balance the critical objectives of regulations that have an adverse impact on business with the costs of compliance by the regulated parties. Agencies should promote transparency, responsiveness, predictability, and flexibility while developing regulations that are fair and easy to follow. Agencies should prioritize compliance over punishment, and to that end, should utilize plain language in the development of regulations.

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## **Reason for Submission**

- 1. R.C. 106.03 and 106.031 require agencies, when reviewing a rule, to determine whether the rule has an adverse impact on businesses as defined by R.C. 107.52. If the agency determines that it does, it must complete a business impact analysis and submit the rule for CSI review.**

**Which adverse impact(s) to businesses has the agency determined the rule(s) create?**

**The rule(s):**

- a.  Requires a license, permit, or any other prior authorization to engage in or operate a line of business.**
- b.  Imposes a criminal penalty, a civil penalty, or another sanction, or creates a cause of action for failure to comply with its terms.**
- c.  Requires specific expenditures or the report of information as a condition of compliance.**
- d.  Is likely to directly reduce the revenue or increase the expenses of the lines of business to which it will apply or applies.**

## **Regulatory Intent**

- 2. Please briefly describe the draft regulation in plain language.**

*Please include the key provisions of the regulation as well as any proposed amendments.*

The Department of Natural Resources, Division of Oil and Gas Resources Management (Division) is undergoing a complete rewrite and reorganization of 1501:9 of the Administrative Code. Part of this effort involves identifying rules that do not need updating at this time and fulfilling the legal requirement to review all rules at least once every five years.

As part of that identification and review, the Division plans to file 55 rules as “no change.” The Division proposes to modify three rules (OAC 1501:9-1-01, 1501:9-1-02, and 1501:9-1-07) merely to reflect the correct online location of two documents that must be made available to the public and another rule (OAC 1501:9-12) to reflect current referenced industry standards.

All but two Chapters of 1501:9 are included in this filing. 1501:9-11 Well Plugging was updated, approved by JCARR, and has an effective date of August 10, 2020. Chapter 1501:9-8 is not due for a five-year rule review until 2021; however, it will be included as part of the reorganization and rewrite.

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The rules included in this filing regulate the permitting, bonding, spacing, and construction of oil and gas wells (1501:9-1); the permitting, approval, and construction of horizontal well pads (1501:9-2); the permitting, construction, inspection, monitoring, and operation of Class II Injection Wells, Enhanced Recovery Projects, and Solution Mining Projects (1501:9-3, 1501:9-5, and 1501:9-7); general safety regulations for regulated oil and gas activities (1501:9-9); and those pipelines that are regulated by the Division (1501:9-10). Chapter 1501:9-12 contains industry standards referenced in other rules. The Division proposes to update those references to their most current standards.

**3. Please list the Ohio statute(s) that authorize the agency, board or commission to adopt the rule(s) and the statute(s) that amplify that authority.**

Authority: 1509.01, 1509.02, 1509.03, 1509.06, 1509.072, 1509.10, 1509.12, 1509.13, 1509.15, 1509.17, 1509.21 1509.22, 1509.221, 1509.23, 1509.24,

Amplifies:1509.01, 1509.02, 1509.021, 1509.022, 1509.03, 1509.04, 1509.05, 1509.06, 1509.061, 1509.062, 1509.07, 1509.072, 1509.074, 1509.08, 1509.09, 1509.10,1509.11, 1509.12, 1509.13,1509.14, 1509.15, 1509.17, 1509.18, 1509.181, 1509.19, 1509.20, 1509.21, 1509.22, 1509.221, 1509.23, 1509.24, 1509.25, 1509.28, 1509.32

**4. Does the regulation implement a federal requirement? Is the proposed regulation being adopted or amended to enable the state to obtain or maintain approval to administer and enforce a federal law or to participate in a federal program? If yes, please briefly explain the source and substance of the federal requirement.**

The U.S. EPA delegated primary enforcement authority of certain types of underground injection control wells (Class II Disposal, Class II Enhanced Recovery and Class III Solution Mining) to Ohio in 1983 and the Agency has successfully regulated the program since that time. In brief, the U.S. EPA requires that Ohio's laws and rules be equal to or more stringent than federal code and implement the goals of the Safe Water Drinking Act, by protecting all Underground Sources of Drinking Water. Ohio's laws, rules, and program operation meet or exceed federal requirements.

**5. If the regulation includes provisions not specifically required by the federal government, please explain the rationale for exceeding the federal requirement.**

Ohio's underground injection control laws, rules, and program operation address state-specific conditions and go into greater detail than federal counterparts. This allows for greater clarity and operational understanding for Ohio companies, and most importantly, adopts provisions that address specific geologic conditions unique to our state.

**6. What is the public purpose for this regulation (i.e., why does the Agency feel that there needs to be any regulation in this area at all)?**

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The regulation of oil and gas activity in Ohio is in the public interest as it protects public health, safety, and the environment while also providing reasonable standards for the regulated industry to operate within. Ohio Revised Code 1509.02 grants the Division sole and exclusive authority to regulate the permitting, location, and spacing of oil and gas wells and production operations within the state. The statute states that the regulation of oil and gas activities is a matter of general statewide interest that requires uniform statewide regulation, and this chapter and rules adopted under it constitute a comprehensive plan with respect to all aspects of the locating, drilling, well stimulation, completing, and operating of oil and gas wells within this state, including site construction and restoration, permitting related to those activities, and the disposal of wastes from those wells.

**7. How will the Agency measure the success of this regulation in terms of outputs and/or outcomes?**

The primary measure of success is the continued protection of Ohioans' healthy, safety, and the environment. The rules included in this filing include standards regarding the issuances of permits, the regular submission of information, regular monitoring of wells/operations, inspections of regulated activities and the report of information. The Division monitors all of these areas for compliance, and takes corrective action when necessary. The Division strives to achieve compliance with applicable rule and law, before taking any punitive actions as Ohio law and rule is written to allow operators to develop oil and gas resources in a manner that will not negatively impact public health, safety, and the environment.

**8. Are any of the proposed rules contained in this rule package being submitted pursuant to R.C. 101.352, 101.353, 106.032, 121.93, or 121.931?**

No

**Development of the Regulation**

**9. Please list the stakeholders included by the Agency in the development or initial review of the draft regulation.**

*If applicable, please include the date and medium by which the stakeholders were initially contacted.*

On July 7, 2020, the Division posted its intention to complete the five-year rule review as posted on the Division's website at <https://ohiodnr.gov/wps/portal/gov/odnr-core/divisions/division-e-oilgas/related-resource/rules-fyrr-public-comment>. The posting was shared via email with representatives of organizations representing oil and gas operators the same day. An email was distributed to the contacts contained in Attachment 2 the next day (July 8) sharing the link and notifying the recipient of the posting.

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**10. What input was provided by the stakeholders, and how did that input affect the draft regulation being proposed by the Agency?**

No input was shared regarding this filing during the public comment period mentioned above.

**11. What scientific data was used to develop the rule or the measurable outcomes of the rule? How does this data support the regulation being proposed?**

12. The Division relied upon geologists and engineers, both from the government and the regulated community, when it originally drafted these rules. Division geologists agreed there was a scientific basis to update the standards contained in OAC 1501:9-12 and that is why the Division is recommending the rule be updated.

**What alternative regulations (or specific provisions within the regulation) did the Agency consider, and why did it determine that these alternatives were not appropriate? If none, why didn't the Agency consider regulatory alternatives?**

The Division reviewed multiple rules as part of its five-year rule review and determined that some of the rules could be pared back, replaced, or rescinded. Those rules will be submitted at a later date as part of our ongoing rule reorganization and rewrite. This package contains only those rules the Division determined required no or minor changes.

**13. Did the Agency specifically consider a performance-based regulation? Please explain. *Performance-based regulations define the required outcome, but don't dictate the process the regulated stakeholders must use to achieve compliance.***

The Division strives to write performance-based regulations and considers many of these to be performance-based. As the Division continues our rewriting and reorganization of Administrative Code 1501:9, we are working to apply performance-based regulations, where applicable and appropriate.

**14. What measures did the Agency take to ensure that this regulation does not duplicate an existing Ohio regulation?**

The Agency has sole and exclusive authority to regulate oil and gas activity (Revised Code 1509.02), so the activities regulated by these rules are not regulated by any other agency. As the Division continues our rewriting and reorganization of Administrative Code 1501:9, we will utilize the RegExplorer tool recently implemented by CSI Ohio to compare and review our proposed rules to ensure no unintended duplication exists.

**15. Please describe the Agency's plan for implementation of the regulation, including any measures to ensure that the regulation is applied consistently and predictably for the regulated community.**

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The agency has communicated with the regulated community in the development of this rule and will continue outreach, including web postings and mailings to ensure the modifications made will be shared with regulated entities. Additionally, agency staff will be prepared to answer questions and field inspectors will be trained in the new requirements.

### **Adverse Impact to Business**

**16. Provide a summary of the estimated cost of compliance with the rule. Specifically, please do the following:**

- a. Identify the scope of the impacted business community; and**
- b. Identify the nature of all adverse impact (e.g., fees, fines, employer time for compliance,); and**
- c. Quantify the expected adverse impact from the regulation.**  
*The adverse impact can be quantified in terms of dollars, hours to comply, or other factors; and may be estimated for the entire regulated population or for a “representative business.” Please include the source for your information/estimated impact.*

No changes (55 rules) to these rules (minor editorial changes to four) are proposed and therefore this rule will impose no additional cost of compliance upon any directly affected persons. The rules impact all entities regulated by the Division. The rules do not impose penalties or fines, however sections 1509.04, 1509.33, and 1509.99 define enforcement action the Division may take, and any applicable civil penalties or fines.

**17. Why did the Agency determine that the regulatory intent justifies the adverse impact to the regulated business community?**

The regulation of oil and gas activity in Ohio is in the public interest as it protects public health, safety, and the environment while also providing reasonable standards for the regulated industry to operate within. As mentioned above, the regulation of oil and gas activities is a matter of general statewide interest that requires uniform statewide regulation, and this chapter and rules adopted under it constitute a comprehensive plan with respect to all aspects of the locating, drilling, well stimulation, completing, and operating of oil and gas wells within this state, including site construction and restoration, permitting related to those activities, and the disposal of wastes from those wells.

### **Regulatory Flexibility**

**18. Does the regulation provide any exemptions or alternative means of compliance for small businesses? Please explain.**

Protection of human health, safety, and the environment is the intent of the statute and rule, so any exemptions would not be applicable. The rules do provide opportunities for the Chief to make modifications based on well-specific conditions and situations.

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**19. How will the agency apply Ohio Revised Code section 119.14 (waiver of fines and penalties for paperwork violations and first-time offenders) into implementation of the regulation?**

ORC contains a process that ensures the Division make reasonable attempts to contact the person for outstanding paperwork violations. Through that process, a person has an opportunity to correct paperwork violations.

**20. What resources are available to assist small businesses with compliance of the regulation?**

Division staff are available to assist with compliance of the regulation for all businesses. Additionally, there are resources available on the Division's website that explain the rules.

## Attachment 1

1501:9-1-01	Amend	Definitions
1501:9-1-02	Amend	Permitting
1501:9-1-03	No Change	Surety bond.
1501:9-1-05	No Change	Safety.
1501:9-1-06	No Change	Severability.
1501:9-1-07	Amend	Prevention of contamination and pollution
1501:9-1-08	No Change	Well construction.
1501:9-2-01	No Change	Definitions.
1501:9-2-02	No Change	Horizontal well site construction.
1501:9-3-01	No Change	Definitions.
1501:9-3-02	No Change	Exceptions.
1501:9-3-04	No Change	Prevention of contamination and pollution.
1501:9-3-05	No Change	Construction of and conversion to saltwater injection wells.
1501:9-3-06	No Change	Permit.
1501:9-3-07	No Change	Operating, monitoring and reporting of saltwater injection wells.
1501:9-3-08	No Change	Temporary storage of saltwater and oil field waste.
1501:9-3-09	No Change	Safety.
1501:9-3-10	No Change	Severability.
1501:9-3-11	No Change	Annular disposal.
1501:9-3-12	No Change	Injection approval required.
1501:9-3-13	No Change	Property rights unaffected.
1501:9-5-01	No Change	Definitions.
1501:9-5-02	No Change	Exceptions.
1501:9-5-03	No Change	Forms.
1501:9-5-04	No Change	Project approval required.
1501:9-5-05	No Change	Permit.

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1501:9-5-06	No Change	Prevention of contamination and pollution.
1501:9-5-07	No Change	Safety.
1501:9-5-08	No Change	Severability.
1501:9-5-09	No Change	Construction of and conversion to enhanced recovery input wells.
1501:9-5-10	No Change	Operation, monitoring and reporting of enhanced recovery projects.
1501:9-5-11	No Change	Property rights unaffected.
1501:9-7-01	No Change	Definitions.
1501:9-7-02	No Change	Applicability.
1501:9-7-03	No Change	Prohibition of unauthorized injection.
1501:9-7-04	No Change	Prevention of contamination and pollution.
1501:9-7-05	No Change	Authorization by rule.
1501:9-7-06	No Change	Identification of underground sources of drinking water and exempted aquifers.
1501:9-7-07	No Change	Permit.
1501:9-7-08	No Change	Construction of solution mining projects.
1501:9-7-09	No Change	Operation, monitoring, reporting, and recordkeeping of solution mining projects.
1501:9-7-10	No Change	Mechanical integrity.
1501:9-7-11	No Change	Plugging and abandonment.
1501:9-7-12	No Change	Safety.
1501:9-7-13	No Change	Severability.
1501:9-7-14	No Change	Property rights unaffected.
1501:9-9-02	No Change	General.
1501:9-9-03	No Change	Drilling and deepening operations.
1501:9-9-04	No Change	Workover, reconditioning, plugging back, completion, and plugging operations.
1501:9-9-05	No Change	Producing operations.
1501:9-9-06	No Change	Exceptions.

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1501:9-9-07	No Change	Severability.
1501:9-10-01	No Change	Definitions.
1501:9-10-02	No Change	General.
1501:9-10-03	No Change	Identification and location of pipelines.
1501:9-10-04	No Change	Strength of pipelines.
1501:9-10-05	No Change	Burial of pipelines.
1501:9-10-06	No Change	Exceptions.
1501:9-12	Amend	Industry Standards

## Attachment 2 - Outreach Contacts

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