

## **Section 8**

# **Geological Data Injection and Confining Zones**

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## **Section 8 – Geological Data on Injection and Confining Zone**

### **8.1 Geology**

#### **8.1.1 Geologic Setting**

The AOR is situated within the central Allegheny Plateau of the Appalachian Basin Province along Pad Fork in the southern portion of Wyoming County in southern West Virginia (see *Figure 8-1 General Location Map*). The injection zone is stratigraphically located within the upper Devonian clastic sedimentary system, lying approximately 4000 feet below Pad Fork.

#### **8.1.2 Structural Geology**

The principal geologic structures of the central Appalachian Basin are broad, gently folded, southwest-northeast trending anticlines and synclines. The injection area is located on the western limb of the Pineville Anticline where strata is westerly dipping at less than five degrees. Minor undulations and flexures are typical, but faulting and tectonic features are generally absent west of the Allegheny Front, the east-facing escarpment of the Allegheny Mountains which forms the Appalachian Structural Front and the eastern extent of the Allegheny Plateau. There are no documented major fault systems in the AOR or evidence of subsurface faulting or fracturing within or in proximity to the injection or confining zones.

#### **8.1.3 Stratigraphy**

##### **8.1.3.1 Injection Zone**

The Berea sandstone is characterized as a light-grey to greyish-brown fine-grained sandstone of the upper-Devonian system occurring in northeastern Ohio, northwestern Pennsylvania, western West Virginia and eastern Kentucky. The Berea is locally between 40 and 65 feet in thickness but can thicken to more than 250 feet across the extent of the deposit. The basal contact with upper Devonian shale is generally sharp, as is the upper contact with the Sunbury Shale (also called the Coffee Shale). *Figure 8-2 General Stratigraphic Chart* in the *Appendix* shows the general stratigraphy of southern West Virginia and highlights the location of the Berea within the stratigraphic section.

The Berea is generally comprised of an upper and lower section with the lower unit, when present, invariably showing better porosity and permeability. There are no permeability records

for wells within five miles of the AOR, however regional porosities for the Berea have been documented to be between 3 and 18 percent.

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### 8.1.3.2 Confining Zone

The confining zone overlying the Berea sandstone is the Sunbury (also called the Coffee) shale, a brownish-black organic shale that locally ranges between 10 and 25 feet in thickness. The Sunbury is distinctly identifiable, even in areas of West Virginia where the Berea is not present. In the AOR, the Sunbury is overlain by a shale layer in excess of 300 feet thick. (PRICE FORMATION)

The confining zone appears to be laterally continuous across the AOR and adjacent areas. Shale, by nature and in the absence of post depositional deformation, is impervious, preventing upward fluid mobility. There is no evidence from available data that suggests the presence of subsurface faulting or fracturing within the confining zone. The depth to the top of the confining layer is generally more than 3500 feet below the surface.

## 8.2 Groundwater Use

A groundwater inventory was conducted that showed no water well usage in a one mile radius from the injection well. Two springs were sampled within a one mile radius of the well. Lab data for spring samples is included in *Section 7*.

## 8.3 Chemical Compatibility

Water analyses (*provided in Section 7*) show the chemical composition of the injection water. Based on current chemical composition and injection history, there are no anticipated compatibility issues between injection fluid and formation fluid, as has been shown historically.

## 8.4 Seismic

The AOR is designated as a relatively low seismic risk zone ([http://earthquake.usgs.gov/earthquakes/states/west\\_virginia/hazards.php](http://earthquake.usgs.gov/earthquakes/states/west_virginia/hazards.php)) with no history of major seismic activity. There are no known seismically active features proximal to the AOR and the likelihood of a future seismic event of sufficient magnitude to cause future migration of injection fluid is low. For seismic history and risk mapping relevant to the AOR, *Figure 8-3 Earthquake Epicenters of West Virginia* published by *West Virginia Geological and Economic Survey* and *Figure 8-4 Seismic Hazard Map of West Virginia* published by the *United States Geological Survey* in the *Appendix*.

## 8.5 Geologic Data

Geologic data within a one-mile radius of the injection site is limited. There are no other known wells within a one-mile radius that penetrate the confining or injection zones. There is only one

known well within a one-mile radius, located approximately 3400 feet to the southeast. The well is a coalbed methane well with a total depth of 1750 feet and does not penetrate deep enough to provide geologic data on the confining or injection zones.

Only general lithologic logs are available for well A-55 and some regional wells, including only general identification of rock type and thickness observed by the driller from rotary cuttings. Information from these logs were used for geologic interpretation of the AOR, but due to a lack of availability of geophysical logs, could not be confirmed and therefore provide a lower level of geologic assurance.

### 8.6 Fluid Migration Model

The following is an estimation of the fluid migration given the information available for the study of the Berea formation within the AOR. The calculation utilizes the volumetric method of prediction of reservoir migration of the injection operation. This calculation uses reservoir height, porosity percent and saturation displacement percent to calculate fluid migration from the well over a given amount of fluid injected. Below is the formula used for this calculation, along with the fluid migration distance from the well and the respective values used.

$$R = \sqrt{Q * 5.615 \left( \frac{ft^3}{bbl} \right) / 3.14 * P * H * Sd}$$

R = Lateral Distance of Fluid Bank from wellbore (ft)

Q = Cumulative Volume (bbls)

P = Porosity Average (%)

H= Reservoir Height (ft)

Sd = Saturation Displacement (%)

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The following equation provides the calculation parameters used based on available information for the AOR:

$$R = \sqrt{Q * 5.615 \left( \frac{ft^3}{bbl} \right) / 3.14 * 0.10 * 63 * 0.25}$$

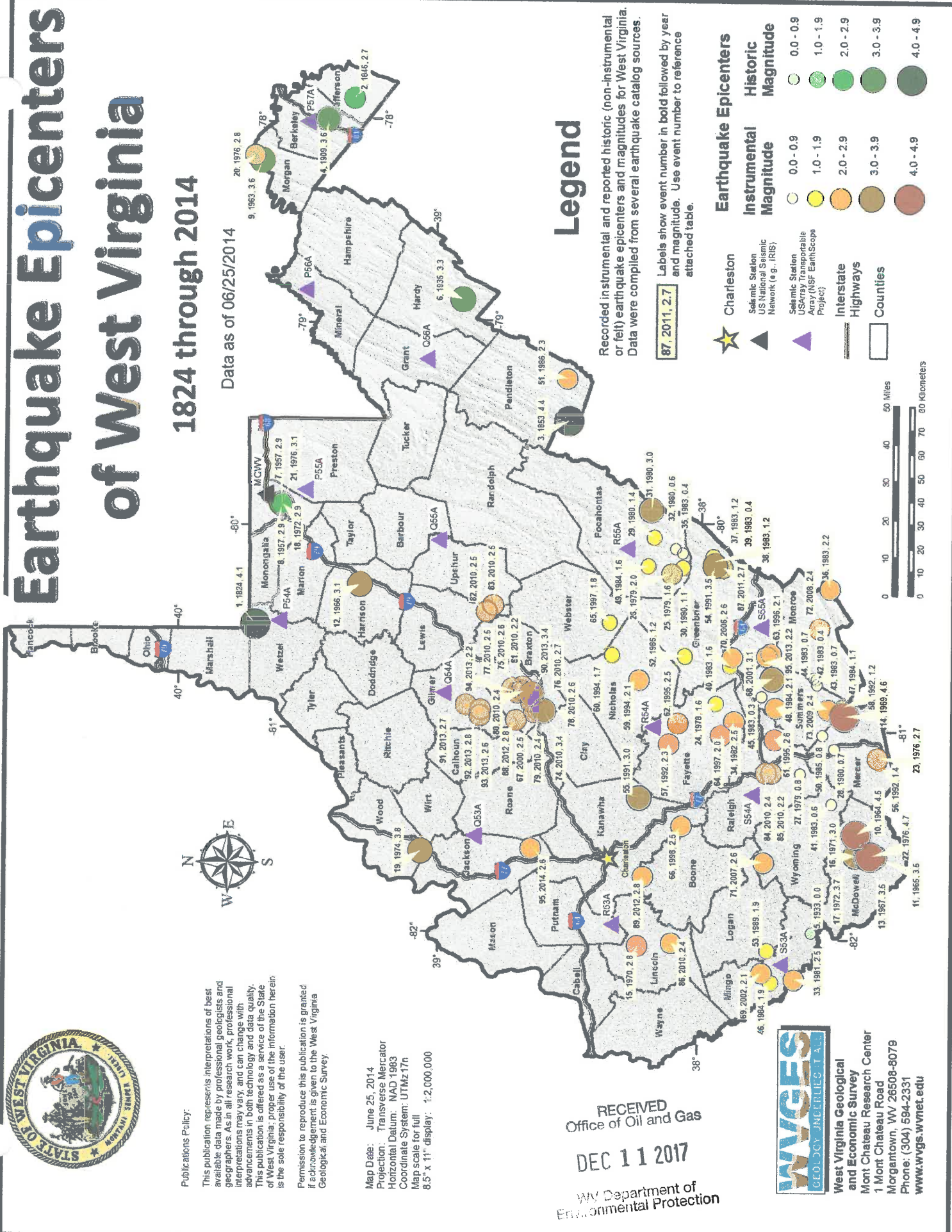
Q = Cumulative Volume	R = Lateral Distance of Fluid Bank From Well Bore
100,000	337.0 ft
250,000	532.8 ft
500,000	753.5 ft
1,000,000	1065.5 ft
1,500,000	1305.0 ft
2,000,000	1506.9 ft



# Earthquake Epicenters of West Virginia

## 1824 through 2014

Data as of 06/25/2014



**Publications Policy:**

This publication represents interpretations of best available data made by professional geologists and geographers. As in all research work, professional interpretations may vary, and can change with advancements in both technology and data quality. This publication is offered as a service of the State of West Virginia; proper use of the information herein is the sole responsibility of the user.

Permission to reproduce this publication is granted if acknowledgment is given to the West Virginia Geological and Economic Survey.

Map Date: June 25, 2014  
 Projection: Transverse Mercator  
 Horizontal Datum: NAD 1983  
 Coordinate System: UTMz17n  
 Map scale for full 8.5" x 11" display: 1:2,000,000

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West Virginia Geological and Economic Survey  
 Mont Chateau Research Center  
 1 Mont Chateau Road  
 Morgantown, WV 26508-8079  
 Phone: (304) 594-2331  
 www.wvges.wvnet.edu

### Legend

Recorded instrumental and reported historic (non-instrumental or felt) earthquake epicenters and magnitudes for West Virginia. Data were compiled from several earthquake catalog sources.

Labels show event number in bold followed by year and magnitude. Use event number to reference attached table.

Charleston	Instrumental Magnitude 0.0 - 0.9	Historic Magnitude 0.0 - 0.9
Seismic Station US National Seismic Network (e.g., IRIS)	Instrumental Magnitude 1.0 - 1.9	Historic Magnitude 1.0 - 1.9
Seismic Station USA-ray Transportable Array (NSF EarthScope Project)	Instrumental Magnitude 2.0 - 2.9	Historic Magnitude 2.0 - 2.9
Interstate Highways	Instrumental Magnitude 3.0 - 3.9	Historic Magnitude 3.0 - 3.9
Counties	Instrumental Magnitude 4.0 - 4.9	Historic Magnitude 4.0 - 4.9



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Event Num	WVQID	County	UTC Year	UTC Month	UTC Day	UTC HH	UTC MM	UTC SS	Latitude (N)	Longitude (W)	Magnitude	Recorded	MMI	Magnitude Type	Source 1	Source 2	USGS Link
1	18240715160	Wood	1824	7	15	16	20	0.00	39.70000	-80.50000	4.1	Historic	4.0	Mb	VTSO	NCEER	
2	18461019020	Jefferson	1846	10	19	2	0	0.00	39.30000	-77.90000	2.7	Historic	3.0	<NULL>	VTSO	<NULL>	
3	18530502140	Pendleton	1853	5	2	14	20	0.00	38.50000	-79.50000	4.4	Historic	5.5	<NULL>	NCEER	<NULL>	
4	19090402070	Berkeley	1909	4	2	7	25	0.00	39.40000	-78.00000	3.6	Historic	5.0	Mb	VTSO	Wheeler I-2737	
5	19330615010	Mingo	1933	6	15	1	14	36.80	37.56800	-81.97300	0.0	Historic	0.0	<NULL>	VTSO	<NULL>	
6	19351101080	Hardy	1935	11	1	8	30	0.00	38.90000	-78.90000	3.3	Historic	4.0	<NULL>	VTSO	NCEER	
7	19570307210	Monongalia	1957	3	7	21	5	9.00	39.60000	-79.90000	2.9	Historic	3.0	Mb	VTSO	<NULL>	
8	19570313210	Monongalia	1957	3	13	21	0	41.00	39.60000	-79.90000	2.9	Historic	3.0	Mb	VTSO	<NULL>	
9	19631010000	Morgan	1963	10	10	0	0	0.00	39.65500	-78.19700	3.6	Historic	0.0	<NULL>	Wheeler I-2737	<NULL>	
10	19641125020	McDowell	1964	11	25	2	50	5.00	37.40000	-81.50000	4.5	Instrumental	0.0	Mb	ANSS	<NULL>	
11	19650426150	McDowell	1965	4	26	15	26	19.70	37.32500	-81.60200	3.5	Instrumental	0.0	MbLg	VTSO	NCEER	
12	19660928000	Harrison	1966	9	28	0	0	0.00	39.30000	-80.30000	3.1	Instrumental	4.0	<NULL>	NCEER	<NULL>	
13	19671216120	McDowell	1967	12	16	12	23	33.40	37.36000	-81.60400	3.5	Instrumental	0.0	Mb	VTSO	NCEER	
14	19691120010	Mercer	1969	11	20	1	0	9.30	37.44900	-80.93200	4.6	Instrumental	6.0	MbLg	VTSO	NCEER	
15	19700811060	Lincoln	1970	8	11	6	14	25.50	38.23000	-82.05000	2.8	Instrumental	4.0	MbLg	VTSO	NCEER	
16	19710401050	McDowell	1971	4	1	5	5	11.00	37.40000	-81.60000	3.0	Instrumental	0.0	Mb	NCEER	ANSS	
17	19720109230	McDowell	1972	1	9	23	24	29.00	37.40000	-81.60000	3.7	Instrumental	0.0	MbLg	NCEER	ANSS	
18	19720912150	Monongalia	1972	9	12	15	17	13.70	39.60000	-79.90000	2.9	Historic	3.0	Mb	VTSO	NCEER	
19	19741020150	Wood	1974	10	20	15	13	55.60	39.06000	-81.60900	3.8	Instrumental	5.0	Mb	VTSO	NCEER	Further info
20	19760130180	Morgan	1976	1	30	18	58	49.80	39.68300	-78.17000	2.8	Instrumental	0.0	Lg	USGS	Further info	
21	19760506180	Monongalia	1976	5	6	18	46	8.10	39.60000	-79.90000	3.1	Historic	4.0	Mb	VTSO	NCEER	
22	19760619050	McDowell	1976	6	19	5	54	13.40	37.34400	-81.60200	4.7	Instrumental	5.0	Mb	VTSO	NCEER	Further info
23	19760703200	Mercer	1976	7	3	20	53	45.80	37.32000	-81.13000	2.7	Instrumental	0.0	MbLg	VTSO	<NULL>	
24	19780814040	Fayette	1978	8	14	4	50	5.40	37.93900	-80.87400	1.6	Instrumental	0.0	Mc	VTSO	ANSS	
25	19790916090	Pocahontas	1979	9	16	9	39	22.60	38.09900	-80.24000	1.6	Instrumental	0.0	Mc	ANSS	<NULL>	
26	19790919000	Pocahontas	1979	9	19	0	45	57.40	38.11000	-80.24300	2.0	Instrumental	0.0	Mc	ANSS	<NULL>	
27	19791031080	Raleigh	1979	10	31	8	32	47.30	37.61700	-81.20700	0.8	Instrumental	0.0	Mc	ANSS	<NULL>	
28	19800410220	Mercer	1980	4	10	22	33	15.70	37.48700	-81.08600	0.7	Instrumental	0.0	Mc	VTSO	ANSS	
29	19800921100	Pocahontas	1980	9	21	10	2	46.30	38.17500	-80.07000	1.4	Instrumental	0.0	Mc	VTSO	ANSS	
30	19801016030	Pocahontas	1980	10	16	3	48	7.60	38.06600	-80.21500	1.1	Instrumental	0.0	Mc	VTSO	ANSS	
31	19801105210	Pocahontas	1980	11	5	21	48	14.20	38.18800	-79.93600	3.0	Instrumental	0.0	ML	ANSS	<NULL>	
32	19801125070	Pocahontas	1980	11	25	7	44	4.00	38.09500	-80.12300	0.6	Instrumental	0.0	Md	VTSO	ANSS	
33	19811130170	Mingo	1981	11	30	17	33	11.00	37.63000	-82.20000	2.5	Instrumental	0.0	Mc	VTSO	ANSS	
34	19820623160	Fayette	1982	6	23	16	17	34.10	37.87000	-80.95700	2.5	Instrumental	0.0	Md	VTSO	ANSS	
35	198300121050	Pocahontas	1983	1	21	5	33	20.40	38.06700	-80.14400	0.4	Instrumental	0.0	Md	VTSO	ANSS	
36	19830526010	Mounroe	1983	5	26	1	4	44.80	37.50600	-80.31600	2.2	Instrumental	0.0	Md	VTSO	ANSS	
37	19830610000	Greenbrier	1983	6	10	0	18	40.40	37.94800	-80.16300	1.2	Instrumental	0.0	Md	VTSO	ANSS	
38	19830610001	Greenbrier	1983	6	10	0	24	57.00	37.95100	-80.18900	1.2	Instrumental	0.0	Md	VTSO	ANSS	
39	19830610002	Greenbrier	1983	6	10	0	31	8.30	37.93800	-80.16800	0.4	Instrumental	0.0	Md	VTSO	ANSS	
40	19830720040	Greenbrier	1983	7	20	4	41	40.90	37.88500	-80.16800	1.6	Instrumental	0.0	Md	VTSO	ANSS	
41	19830725030	Wyoming	1983	7	25	3	27	0.20	37.49600	-81.35200	0.6	Instrumental	0.0	Md	VTSO	ANSS	
42	19831113160	Summers	1983	11	13	16	51	6.70	37.55600	-80.77500	0.4	Instrumental	0.0	Md	VTSO	ANSS	
43	19831113170	Mounroe	1983	11	13	17	50	50.10	37.55900	-80.75300	0.7	Instrumental	0.0	Md	VTSO	ANSS	
44	19831125160	Mounroe	1983	11	25	16	27	47.80	37.56800	-80.74500	0.7	Instrumental	0.0	Md	VTSO	ANSS	
45	19831223100	Summers	1983	12	23	10	51	21.90	37.76600	-80.83700	0.3	Instrumental	0.0	Md	VTSO	ANSS	
46	19840202050	Mingo	1984	2	2	5	10	19.70	37.17000	-82.21800	1.9	Instrumental	0.0	Md	VTSO	ANSS	
47	19840311040	Summers	1984	3	11	4	1	38.90	37.47400	-80.90000	1.1	Instrumental	0.0	Md	VTSO	ANSS	
48	19841009050	Summers	1984	10	9	5	33	31.50	37.71300	-80.89100	2.1	Instrumental	0.0	Md	VTSO	ANSS	
49	19841221130	Pocahontas	1984	12	21	13	12	21.90	38.19800	-80.20800	1.6	Instrumental	0.0	Md	VTSO	ANSS	
50	19850614070	Mercer	1985	6	14	7	57	10.20	37.53400	-81.02000	0.8	Instrumental	0.0	Md	VTSO	ANSS	
51	19860226210	Pendleton	1986	2	26	21	53	20.80	38.50700	-79.29200	2.3	Instrumental	0.0	Md	VTSO	ANSS	
52	19861220080	Greenbrier	1986	12	20	8	13	12.80	38.05800	-80.64300	1.2	Instrumental	0.0	Md	VTSO	ANSS	
53	19890319100	Logan	1989	3	19	10	7	55.80	37.73500	-82.06400	1.9	Instrumental	0.0	Md	VTSO	ANSS	
54	19910422010	Greenbrier	1991	4	22	1	1	20.20	37.94200	-80.20500	3.5	Instrumental	0.0	Md	VTSO	ANSS	Further info

Event Num	WVQID	County	UTC Year	UTC Month	UTC Day	UTC HH	UTC MM	UTC SS	Latitude (N)	Longitude (W)	Magnitude	Recorded	MMI	Magnitude Type	Source 1	Source 2	USGS Link
55	19910628180	Kanawha	1991	6	28	18	34	55.50	38.23100	-81.33500	3.0	Instrumental	0.0	Mb	VTSO	ANSS	
56	19920329200	Mercer	1992	3	29	20	16	48.20	37.31400	-81.14900	1.4	Instrumental	0.0	Md	VTSO	ANSS	
57	19920306210	Fayette	1992	5	6	21	20	23.90	38.11800	-81.06900	2.3	Instrumental	0.0	Md	VTSO	ANSS	
58	19921124020	Summers	1992	11	24	2	26	50.70	37.45700	-80.88400	1.2	Instrumental	0.0	Md	VTSO	ANSS	
59	19940204070	Nicholas	1994	2	4	7	40	32.40	38.23600	-80.75900	2.1	Instrumental	0.0	Md	VTSO	ANSS	
60	19940619080	Nicholas	1994	6	19	8	36	41.30	38.33900	-80.64000	1.7	Instrumental	0.0	Md	VTSO	ANSS	
61	19951115100	Raleigh	1995	11	15	10	29	24.80	37.71700	-81.04300	2.5	Instrumental	0.0	Md	VTSO	ANSS	
62	19951228230	Fayette	1995	12	28	23	48	30.40	38.08400	-80.96800	2.5	Instrumental	0.0	Md	VTSO	ANSS	
63	19960811090	Greenbrier	1996	8	11	9	11	21.30	37.73100	-80.62800	2.1	Instrumental	<NULL>	Mc	ANSS	<NULL>	
64	19970222140	Fayette	1997	2	22	14	32	33.10	37.92100	-81.02700	2.0	Instrumental	<NULL>	Mc	ANSS	<NULL>	
65	19970315050	Webster	1997	3	15	5	56	36.40	38.34700	-80.48400	1.8	Instrumental	0.0	Md	VTSO	ANSS	
66	19970315050	Kanawha	1998	10	2	10	1	6.90	38.06800	-81.46600	2.5	Instrumental	0.0	Md	VTSO	ANSS	
67	20001016170	Braxton	2000	10	16	17	56	13.80	38.63600	-80.92000	2.5	Instrumental	0.0	Md	VTSO	ANSS	
68	20011204210	Summers	2001	12	4	21	15	13.90	37.72600	-80.75200	3.1	Instrumental	0.0	Mb	VTSO	ANSS	
69	20020327080	Mingo	2002	3	27	8	25	3.30	37.75300	-82.17100	2.1	Instrumental	0.0	Md	VTSO	ANSS	
70	20060711120	Greenbrier	2006	7	11	12	1	43.10	37.87800	-80.64900	2.6	Instrumental	0.0	Mb	CERI	VTSO	Further info
71	20070830120	Wyoming	2007	8	30	12	52	9.34	37.75300	-81.63600	2.6	Instrumental	0.0	Lg GS	CERI	USGS ENS	
72	20080129010	Monroe	2008	1	29	1	4	20.70	37.54480	-80.50980	2.4	Instrumental	<NULL>	Md	CERI	ANSS	
73	20090411180	Summers	2009	4	11	18	11	9.07	37.51330	-80.89570	2.4	Instrumental	<NULL>	Md	CERI	ANSS	
74	20100404090	Braxton	2010	4	4	9	19	14.01	38.59900	-80.91617	3.4	Instrumental	0.0	MbLg	CERI	USGS ENS	Further info
75	20100129010	Braxton	2010	4	29	1	36	22.59	38.68567	-80.81483	3.6	Instrumental	0.0	MbLg	CERI	USGS ENS	Further info
76	20100429120	Braxton	2010	4	29	12	38	53.43	38.64700	-80.87200	2.7	Instrumental	0.0	MbLg	USGS ENS	Further info	
77	20100429130	Braxton	2010	4	29	23	26	39.47	38.72200	-80.80300	2.5	Instrumental	0.0	Lg GS	CERI	USGS ENS	Further info
78	20100507100	Braxton	2010	5	7	10	26	3.47	38.60650	-80.91317	2.6	Instrumental	0.0	MbLg	CERI	USGS ENS	Further info
79	20100508030	Braxton	2010	5	8	3	3	0.62	38.62300	-80.91133	2.4	Instrumental	0.0	Md	CERI	USGS ENS	Further info
80	20100724090	Braxton	2010	7	24	9	15	44.13	38.67533	-80.82017	2.4	Instrumental	0.0	Md	CERI	USGS ENS	Further info
81	20100725030	Braxton	2010	7	25	3	48	70.00	38.67900	-80.79700	2.2	Instrumental	0.0	Md	USGS ENS	LDEO	
82	20100815040	Lewis	2010	8	15	4	38	47.38	38.81833	-80.42983	2.5	Instrumental	0.0	Md	CERI	USGS	Further info
83	20100821030	Upshur	2010	8	21	3	16	21.99	38.79250	-80.39767	2.5	Instrumental	0.0	Md	CERI	USGS	Further info
84	20100826040	Raleigh	2010	8	26	4	22	15.19	37.74833	-81.20467	2.4	Instrumental	0.0	Md	CERI	USGS	Further info
85	20100826041	Raleigh	2010	8	26	4	24	55.39	37.72733	-81.20433	2.2	Instrumental	0.0	Md	CERI	USGS	Further info
86	20100913150	Lincoln	2010	9	13	15	8	46.47	38.10000	-82.03400	2.4	Instrumental	0.0	Md	CERI	ANSS	
87	2010825050	Greenbrier	2011	8	25	5	59	13.76	37.91600	-80.21533	2.7	Instrumental	4.0	Md	CERI	USGS	Further info
88	20120111190	Boone	2012	1	10	19	38	58.66	38.70400	-80.95900	2.8	Instrumental	4.0	unk	CERI	USGS	Further info
89	20120316150	Boone	2012	3	16	15	5	55.00	38.21200	-81.71400	2.8	Instrumental	2.0	MbLg	CERI	USGS NEIC	Further info
90	20130331140	Braxton	2013	3	31	14	1	24.03	38.64500	-80.83317	3.4	Instrumental	5.0	Mw	CERI	USGS NEIC	Further info
91	20130720110	Gilmer	2013	7	20	11	38	46.18	38.89567	-80.88700	2.7	Instrumental	<NULL>	MbLg	CERI	USGS ENS	Further info
92	20130730060	Gilmer	2013	7	30	6	9	4.85	38.83933	-80.90867	2.8	Instrumental	<NULL>	Md	CERI	USGS ENS	Further info
93	20130816110	Gilmer	2013	8	16	11	2	21.04	38.84150	-80.93867	2.6	Instrumental	3.0	MbLg	CERI	USGS ENS	Further info
94	20131013090	Braxton	2013	10	13	9	20	58.55	38.70117	-80.82417	2.2	Instrumental	<NULL>	Md	CERI	USGS ENS	Further info
95	20131019080	Greenbrier	2013	10	19	8	41	57.43	37.74767	-80.64333	2.2	Instrumental	<NULL>	Md	CERI	USGS ENS	Further info
96	20140606220	Jackson	2014	6	6	22	15	40.79	38.64383	-81.58550	2.6	Instrumental	<NULL>	Md	CERI	USGS ENS	Further info

Data as of June 25, 2014. For a more detailed listing, please download the West Virginia Earthquake spreadsheet from WVGES at <http://www.wvges.wvnet.edu/www/earthquakes/seismic.html>

If you view this map and data as a PDF, you can click any of the blue hyperlinked text to view further information on a web site.

Please note that USGS Links, above, are considered "beta" at the time of this publication and USGS may change destinations, pages, etc. afterward.

Definition of terms on next page.

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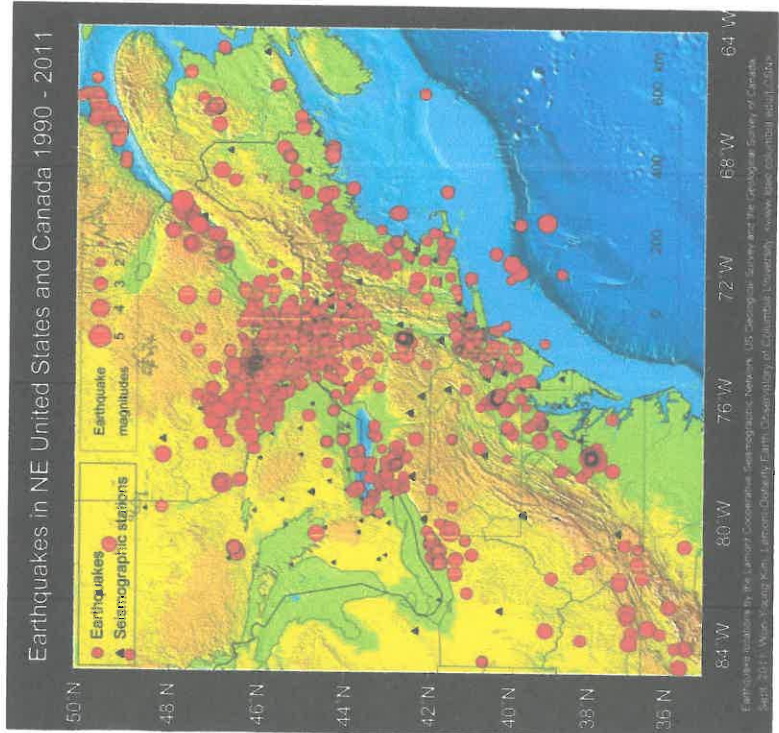
#### Definitions and Explanations:

- **County:** the name of the county where the epicenter was located, derived from spatial selection.
- Dates and times are in Coordinated Universal Time (UTC) for Year, Month, Day, Hours (HH), Minutes (MM) and Seconds (SS). (For Eastern Standard Time, the offset is - 5 hours).
- **Magnitude (Mag):** Magnitude numbers indicative of an earthquake's relative size and is the measured maximum motion as recorded by a seismograph. The numbers are pulled from various sources; the primary source whenever possible.
- **Recorded:** refers to the means by which magnitudes were recorded: if they were reported as "felt" (Historical) or recorded via scientific instrumentation (Instrumental) as retrieved from Source1 or Source2.
- **Latitude (Lat\_N) and Longitude (Lon\_W)** values are expressed in decimal degrees for the northern (\_N) and western (\_W) hemispheres, respectively.
- **MMI:** The Modified Mercalli intensity scale for epicenter intensity, usually designated with Roman numerals. Visit USGS at <http://earthquake.usgs.gov/learn/topics/mercalli.php> for further information.
- **Mag\_Type:** Magnitude type code; the method used in measuring magnitudes (e.g., *Mb* for "body-wave", *Mc* for "coda amplitude", *Md* for "coda duration").
- **Depth\_KM:** The reported depth of the earthquake hypocenter or focus (below the epicenter on the surface) in kilometers.

For other or more detailed earthquake and seismological definitions, please visit the USGS (<http://earthquake.usgs.gov/learn/glossary/>) and Rapid Earthquake Viewer (<http://rev.seis.sc.edu/definition.html>).

#### Sources (Source1 and Source2):

- VTSO – Virginia Tech Seismological Observatory (Primary Source)
- ANSS – Advanced National Seismic System
- CERI – Center for Earthquake Research and Information
- LDEO – Lamont-Doherty Earth Observatory
- NCEER – National Center for Earthquake Engineering Research
- USGS ENS – United States Geological Survey, Earthquake Notification Service
- Wheeler I-2737 – Wheeler, Russell L., *Earthquakes In and Near the Northeastern United States, 1638-1998* (Used only as reference here)

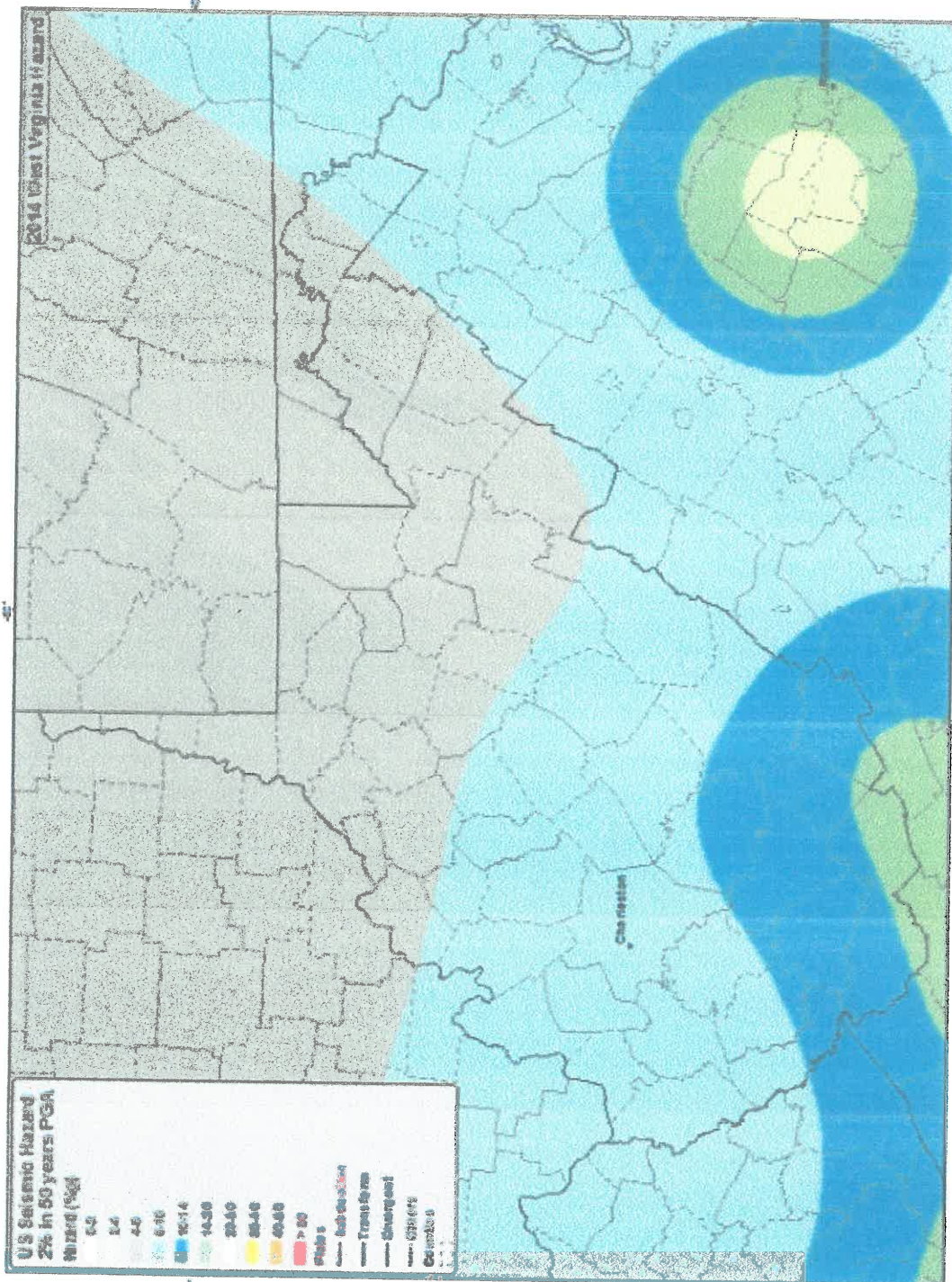


Northeastern United States and southeastern Canadian earthquakes from 1990 to 2011. Image courtesy of the Lamont-Doherty Earth Observatory (Won-Young Kim) of Columbia University, New York. Used by permission.

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West Virginia Geological and  
Economic Survey  
<http://www.wvgs.wvnet.edu/>

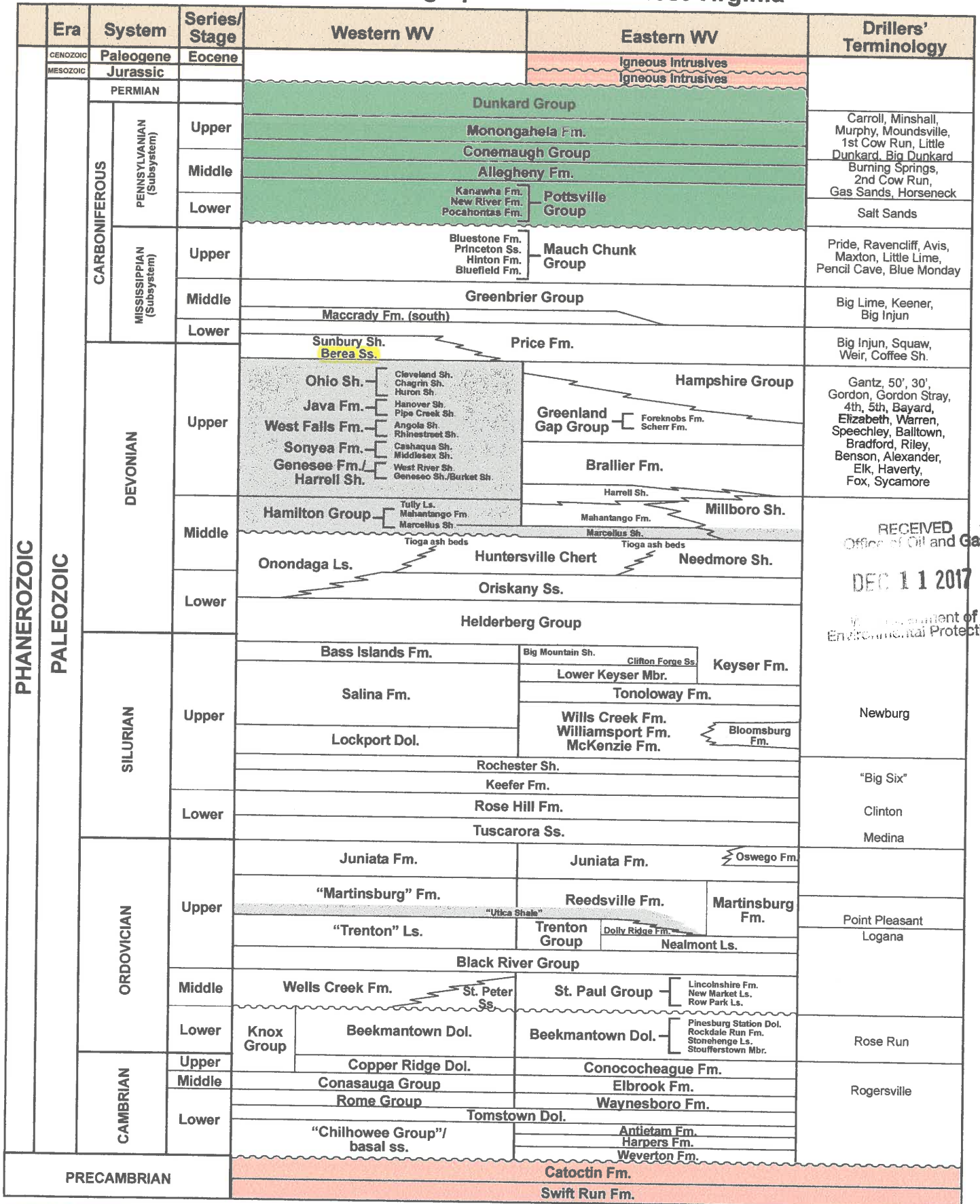


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# Generalized Stratigraphic Chart for West Virginia

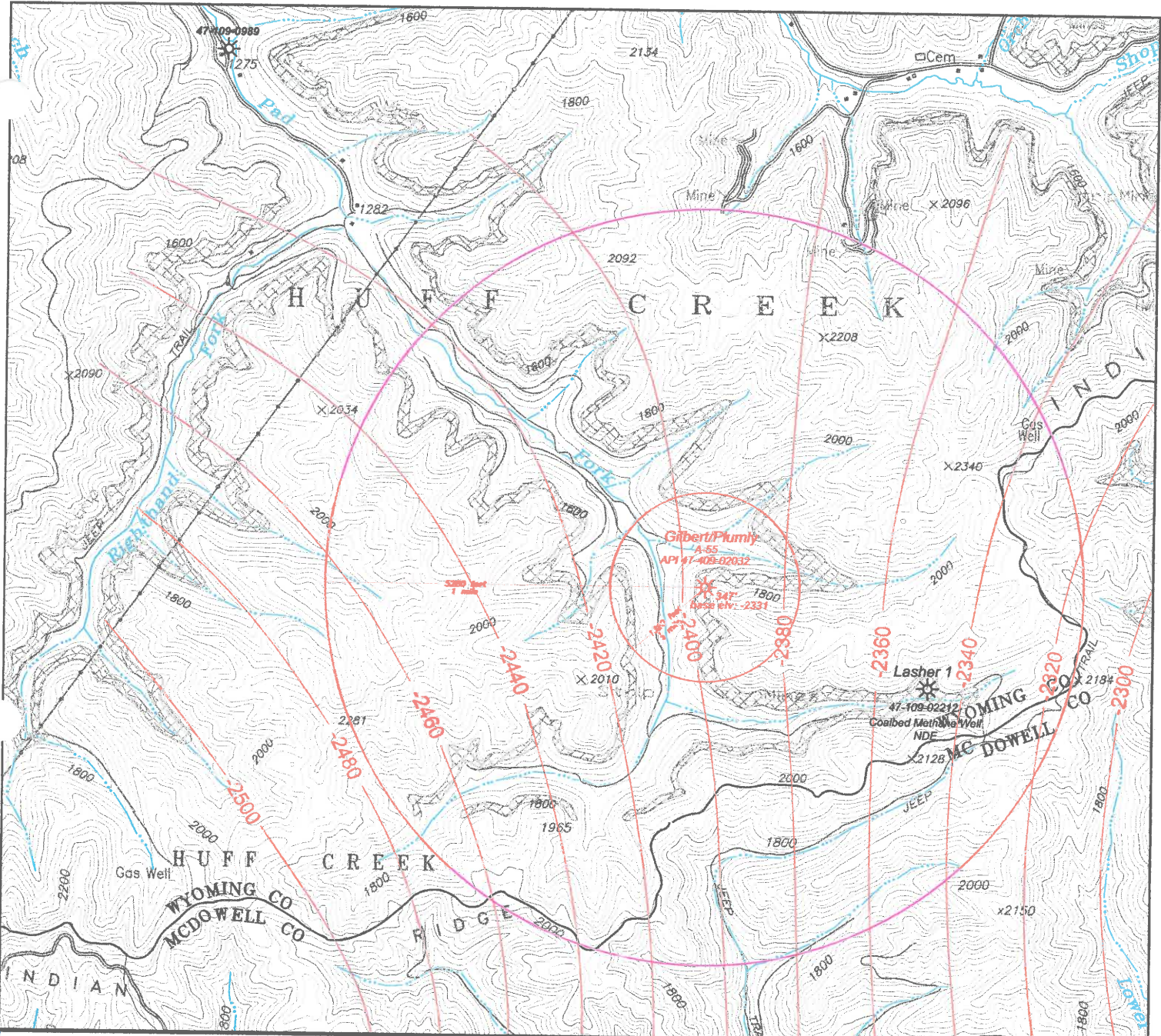


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Igneous/Metamorphic  
 Coal-bearing interval  
 Organic shale  
 Fm. Formation   Ss. Sandstone   Sh. Shale   Mbr. Member  
 ~~~~~ unconformity   ~~~~~ facies  
 Note: No vertical scale implied

(This chart uses current WVGES terminology and supercedes stratigraphic unit names used in older publications.)





### Confining Layer Structure Map

- 347'  
base elev: -2331    Confining Layer Thickness and Base Elevation in Feet
- 2300'    Confining Layer Base/Berea Top Structure Isoline in Feet
- NDE    Well Not Deep Enough to Penetrate Confining Layer

Coordinate System: West Virginia South State Plane NAD 27

**e2C** Envirocheck of Virginia, Inc.  
"Energy, Environmental Consulting"

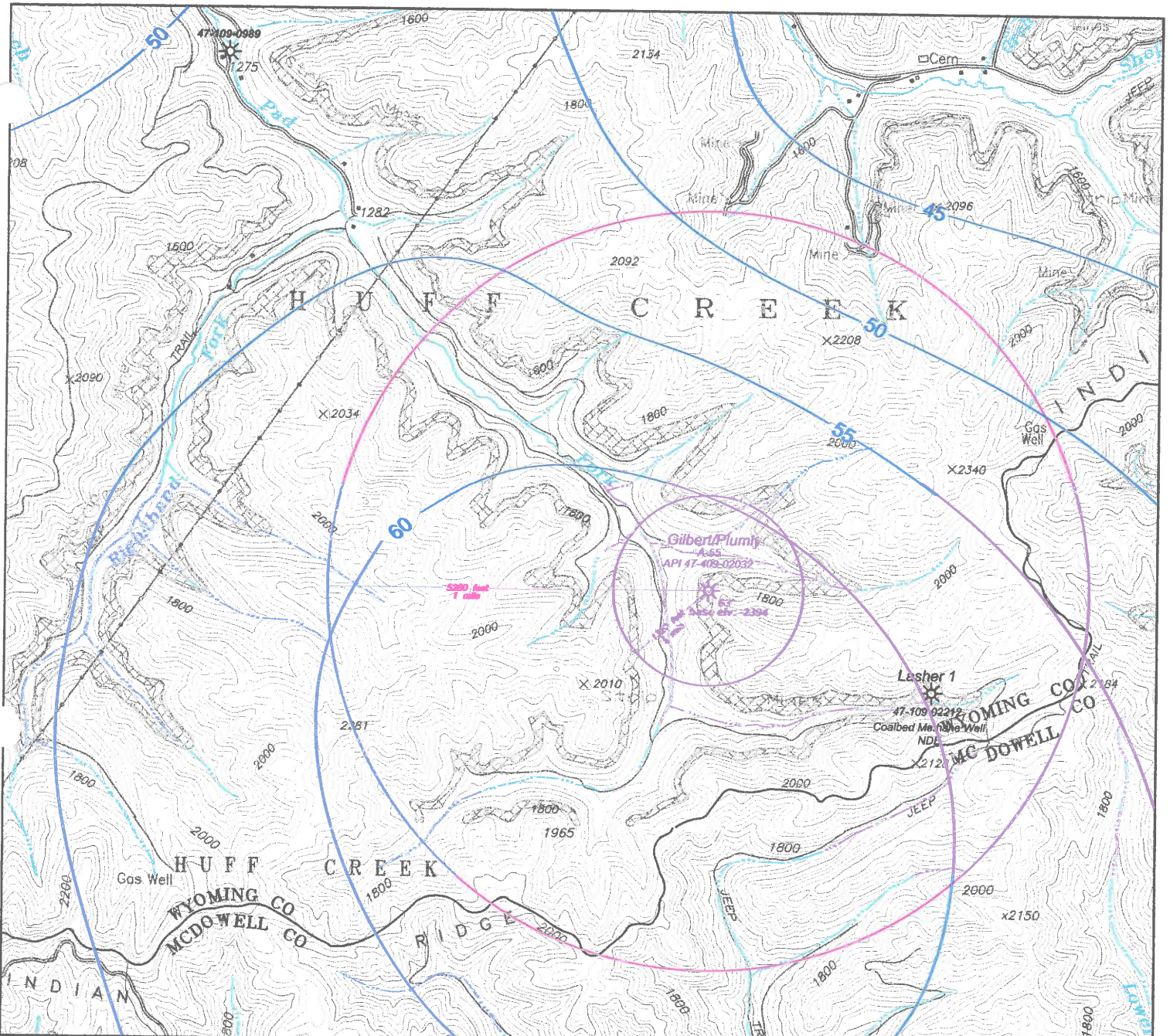


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**Atlas Energy Resources, LLC**



### Injection Zone Thickness Map

- 63'  
base elev: -2394      Injection Zone Thickness and Base Elevation in Feet
- 60      Injection Zone Thickness Isoline in Feet
- NDE      Well Not Deep Enough to Penetrate Confining Layer

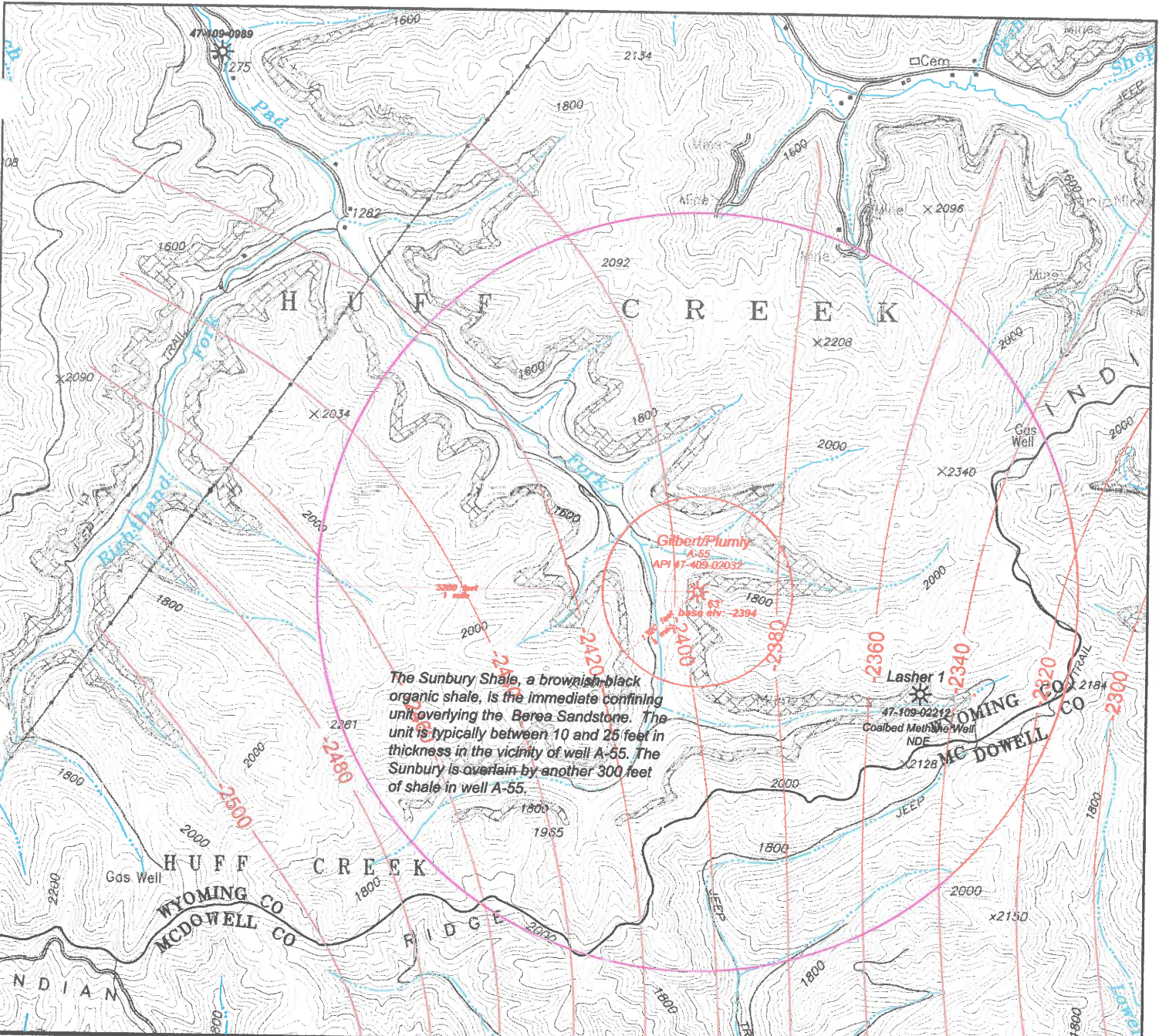
Coordinate System: West Virginia South State Plane NAD 27

**e2C** Envirocheck of Virginia, Inc.  
"Energy, Environmental Consulting"



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**Atlas Energy Resources, LLC**



The Sunbury Shale, a brownish-black organic shale, is the immediate confining unit overlying the Berea Sandstone. The unit is typically between 10 and 25 feet in thickness in the vicinity of well A-55. The Sunbury is overlain by another 300 feet of shale in well A-55.

### Injection Zone Structure Map

- 63'  
base elev: -2394    Injection Zone Thickness and Base Elevation In Feet
- 2300    Injection Zone Base Structure Isoline In Feet
- NDE    Well Not Deep Enough to Penetrate Injection Zone

Coordinate System: West Virginia South State Plane NAD 27

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*"Energy, Environmental Consulting"*

Scale in Feet

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Hyrle Valley





GAMMA RAY  
CEMENT BOND  
VDL - CCL

|                        |                                |                     |
|------------------------|--------------------------------|---------------------|
| Company                | GEOMET OPERATING COMPANY, INC. |                     |
| Well                   | GILBERT AND PLUMLEY A-#55      |                     |
| Field                  | HUFF CREEK                     |                     |
| County                 | WYOMING                        |                     |
| State                  | WEST VIRGINIA                  |                     |
| Company                | GEOMET OPERATING COMPANY, INC. |                     |
| Well                   | GILBERT AND PLUMLEY A-#55      |                     |
| Field                  | HUFF CREEK                     |                     |
| County                 | WYOMING                        | State WEST VIRGINIA |
| Location:              | API #: 4110402032              | Other Services      |
| SEC                    | TWP                            | RGE                 |
| Permanent Datum        |                                | Elevation 1696'     |
| Log Measured From      |                                | K B                 |
| Drilling Measured From |                                | D F                 |
|                        |                                | G.L. 1928'          |
| Date                   | 01-23-03                       |                     |
| Run Number             | One                            |                     |
| Depth Logger           | 4178'                          |                     |
| Bottom Logged Interval | 4172'                          |                     |
| Top Log Interval       |                                |                     |
| Open Hole Size         | 6 1/4"                         |                     |
| Type Fluid             | WATER                          |                     |
| Density / Viscosity    |                                |                     |
| Max. Recorded Temp.    |                                |                     |
| Estimated Cement Top   |                                |                     |
| Time Well Ready        |                                |                     |
| Time Logger on Bottom  |                                |                     |
| Equipment Number       |                                |                     |
| Location               |                                |                     |
| Recorded By            | R. L. MOSELEY                  |                     |
| Witnessed By           | MR. CLEARY                     |                     |
| Run Number             |                                |                     |
| Borehole Record        |                                |                     |
| Bit                    | From                           | To                  |
| Size                   | Weight                         | From                |
|                        |                                | To                  |
| Casing Record          |                                |                     |
| Surface String         | Size                           | Weight              |
| Pic. String            |                                | Top                 |
|                        |                                | Bottom              |
| Production String      | 4.5"                           | SURFACE             |
| Liner                  |                                | 4178'               |

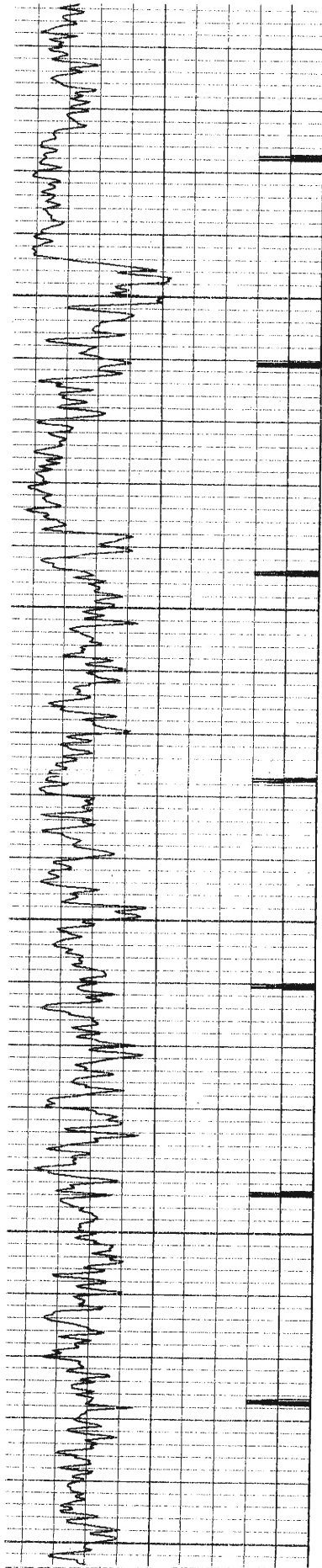
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All interpretations are opinions based on inferences from electrical or other measurements and we cannot and do not guarantee the accuracy or correctness of any interpretation, and we shall not, except in the case of gross or willful negligence on our part, be liable or responsible for any loss, costs, damages, or expenses incurred or sustained by anyone resulting from any interpretation made by any of our officers, agents or employees. These interpretations are also subject to our general terms and conditions set out in our current Price Schedule.

Comments

Database File: 55cbl.db  
 Dataset Pathname: pass1  
 Presentation Format: cbl\_sr  
 Dataset Creation: Thu Jan 23 11:05:13 2003 by Log 6.2\_B4  
 Charted by: Depth in Feet scaled 1:240

|                  |     |      |                    |     |     |                  |      |
|------------------|-----|------|--------------------|-----|-----|------------------|------|
| Collar Locator   | -1  | 0    | Amplitude (mV)     | 100 | 200 | Variable Density | 1200 |
| Gamma Ray (GAPI) | 200 | 1200 | Travel Time (usec) | 200 |     |                  |      |



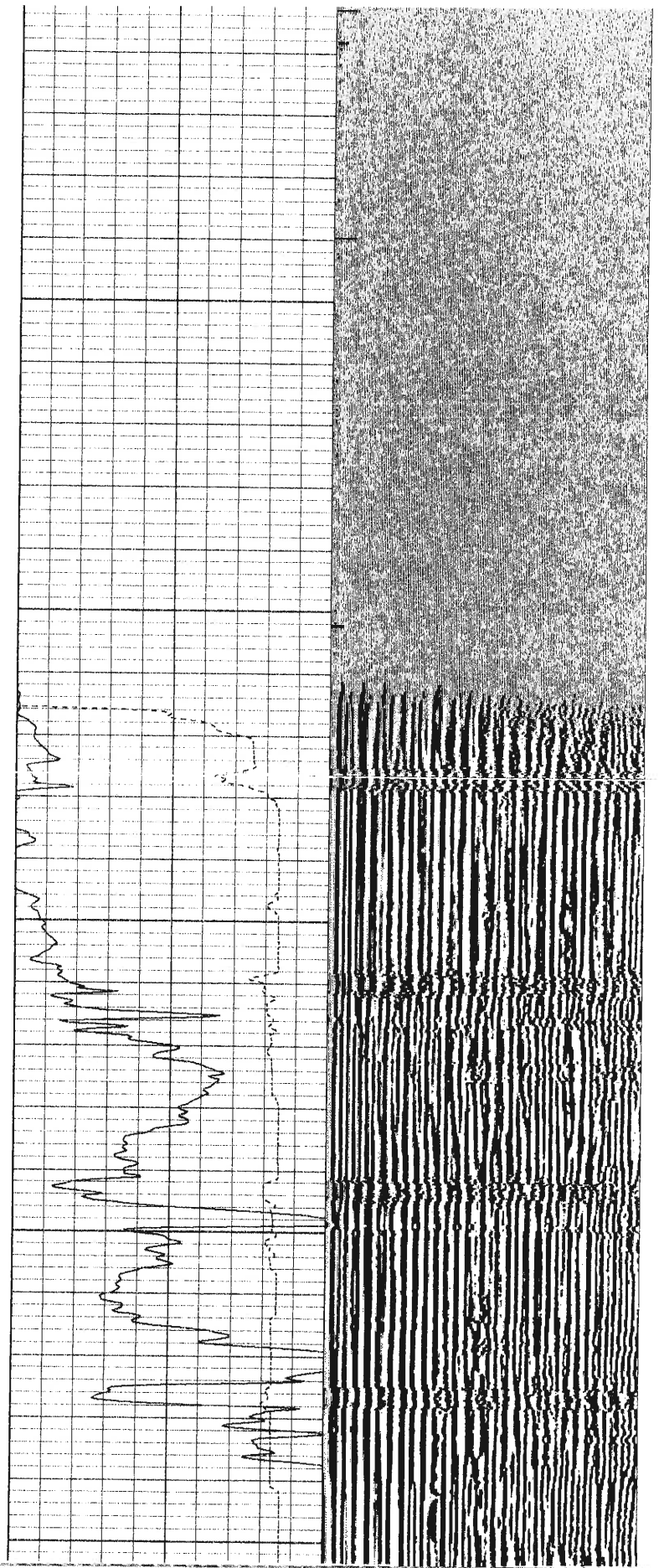
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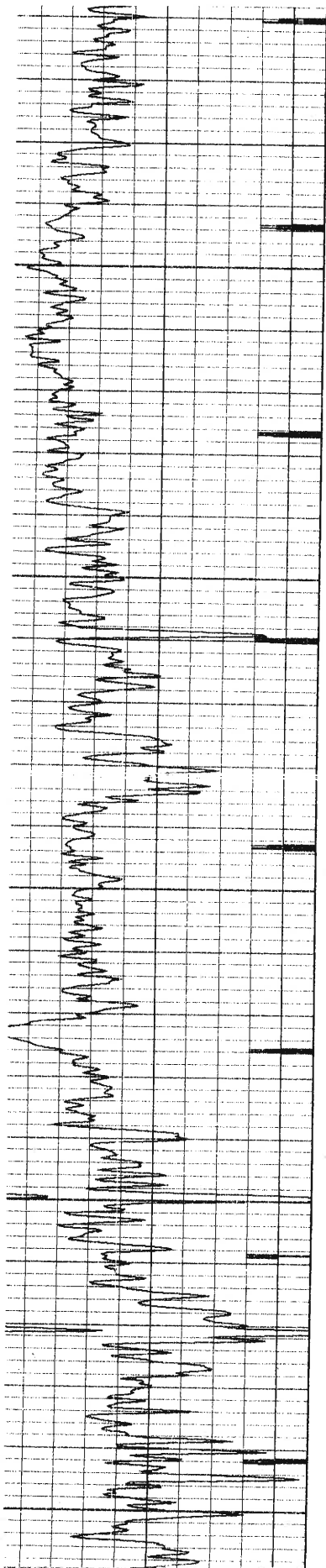
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150

200

250





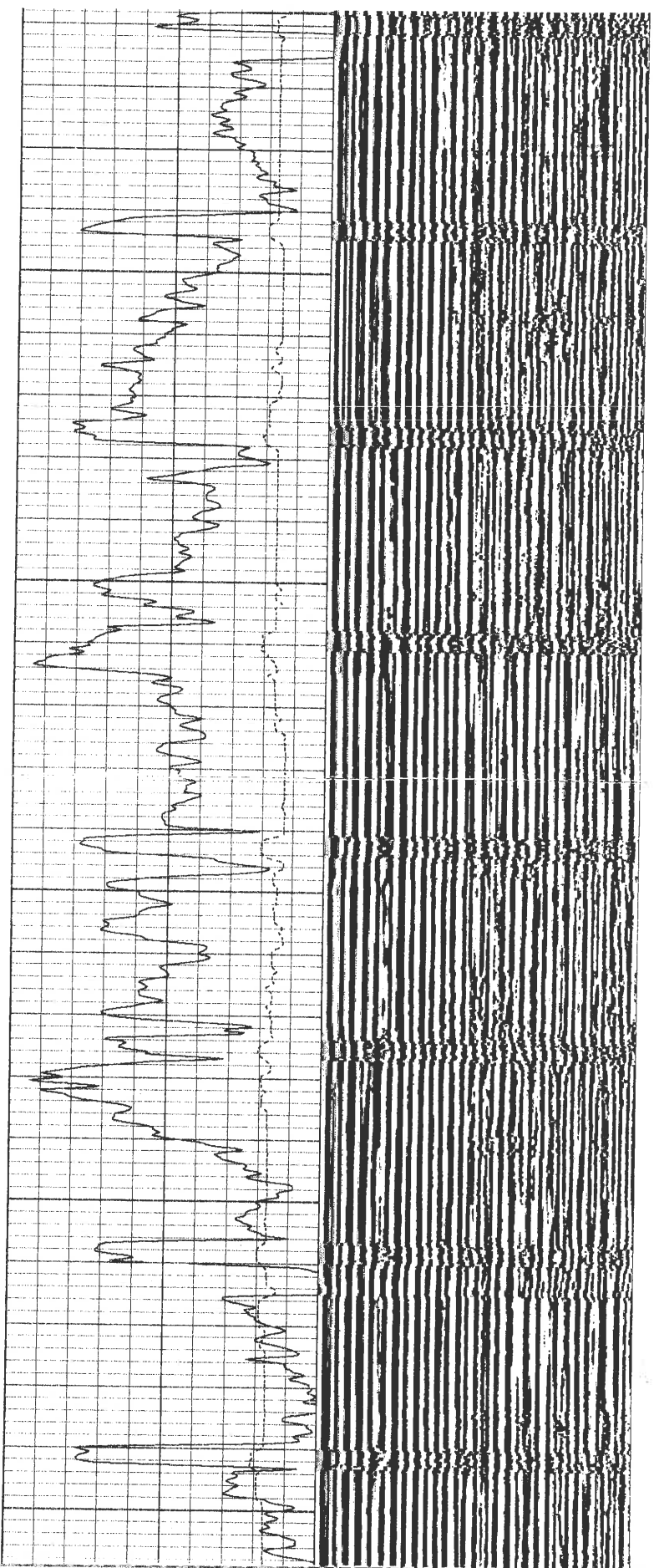
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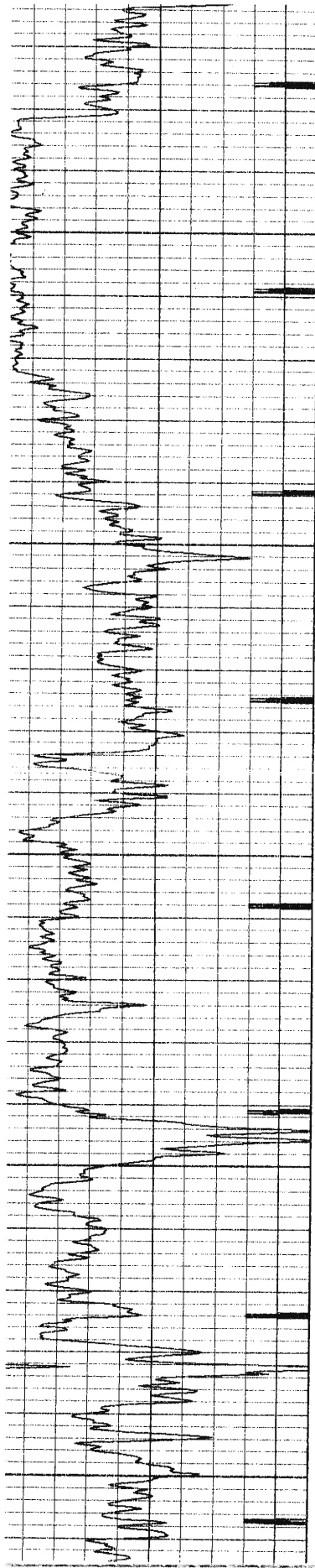
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400

450

500





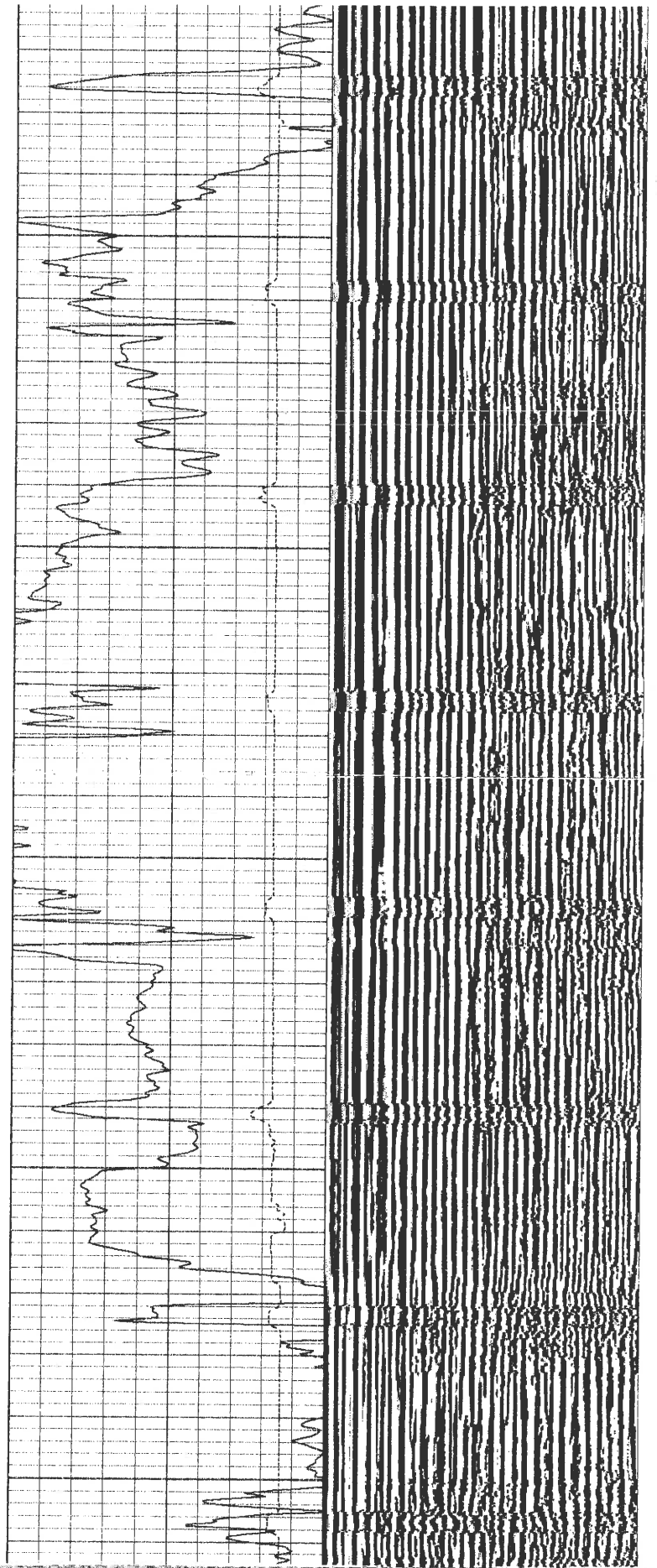
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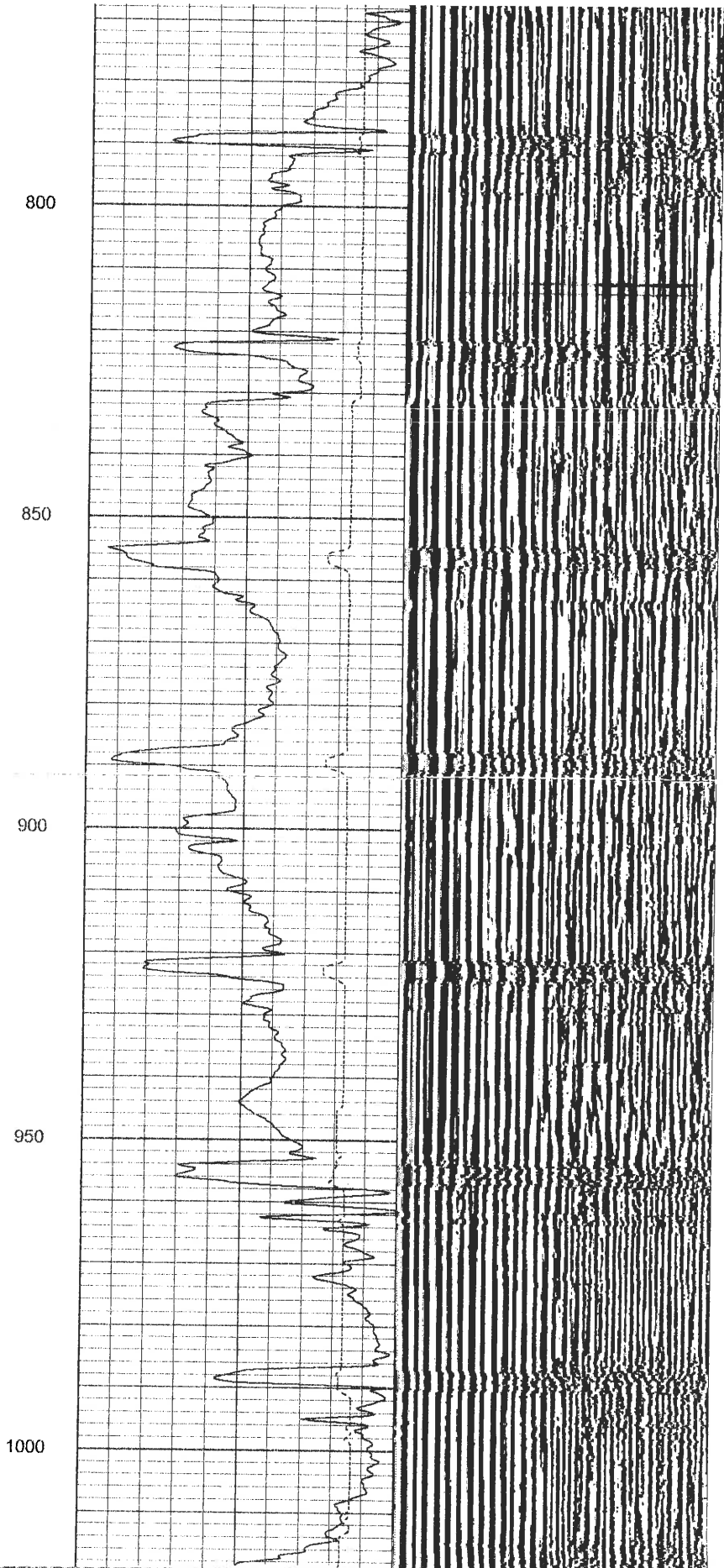
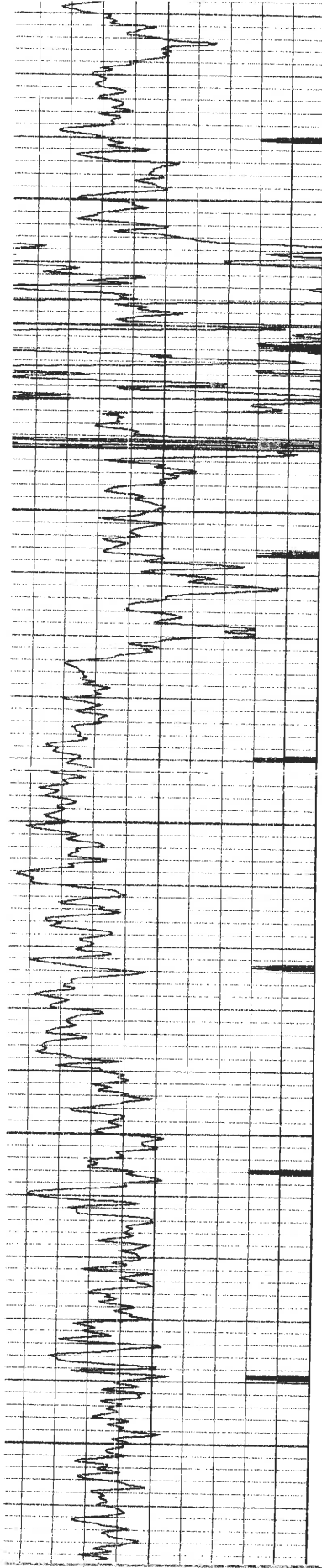
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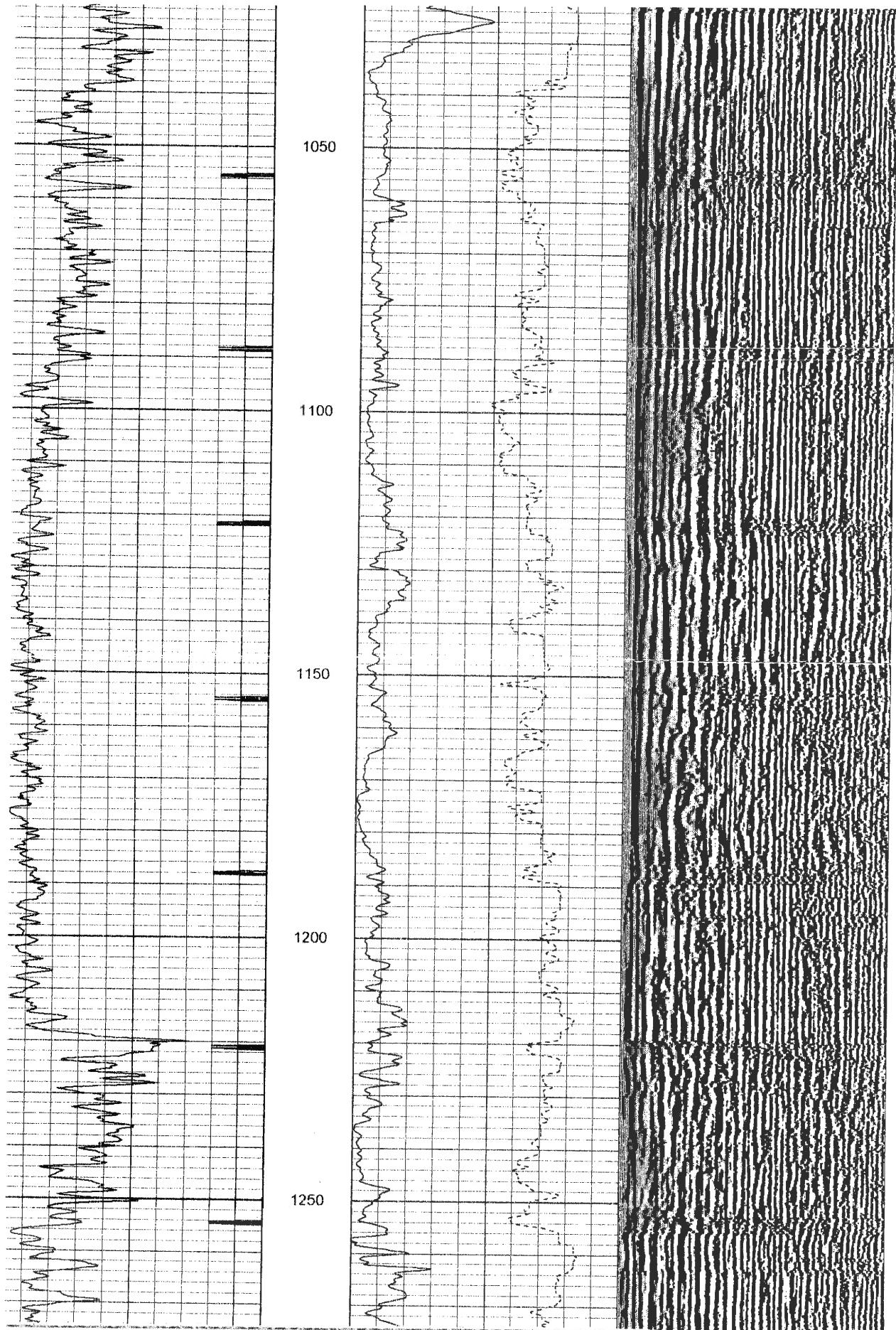
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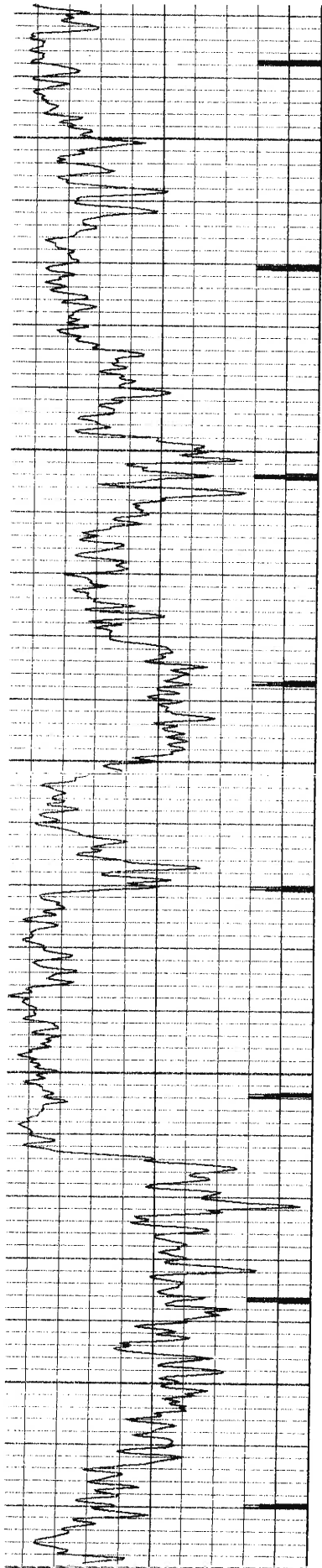
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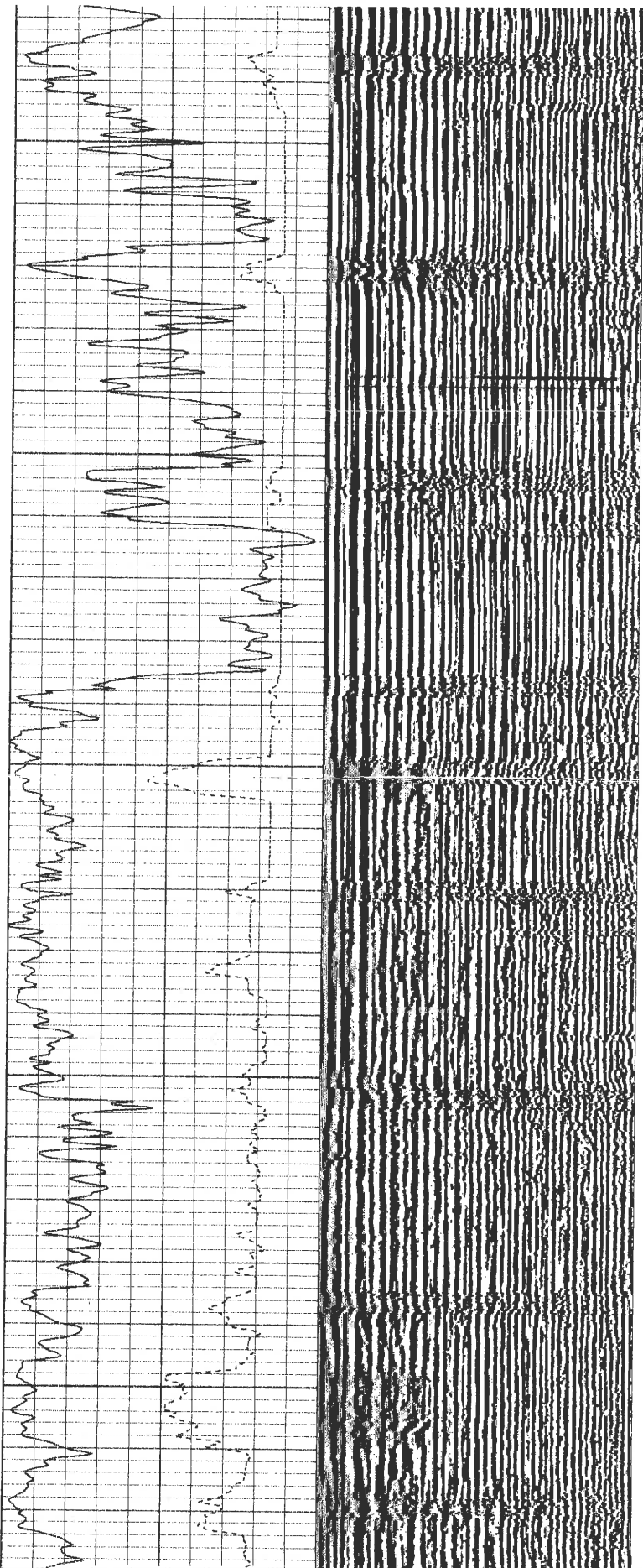


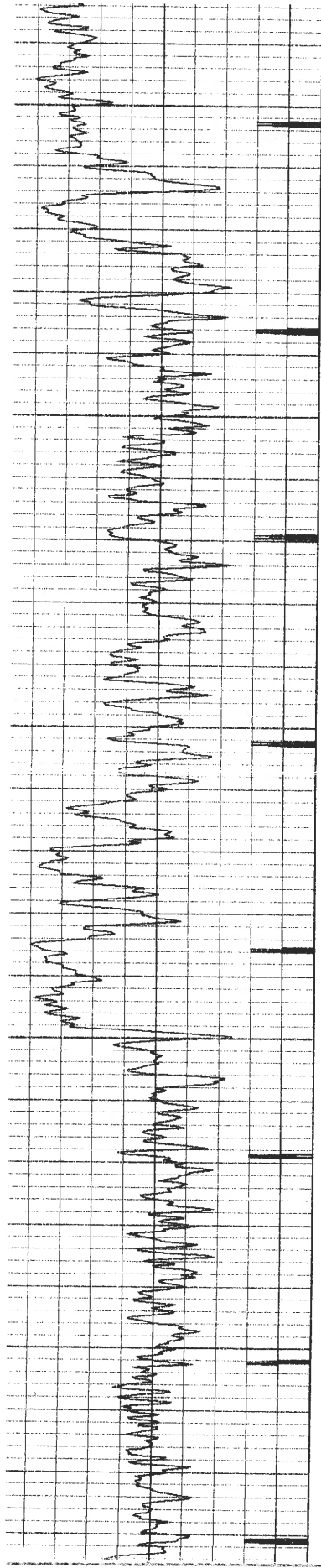






1300  
1350  
1400  
1450  
1500





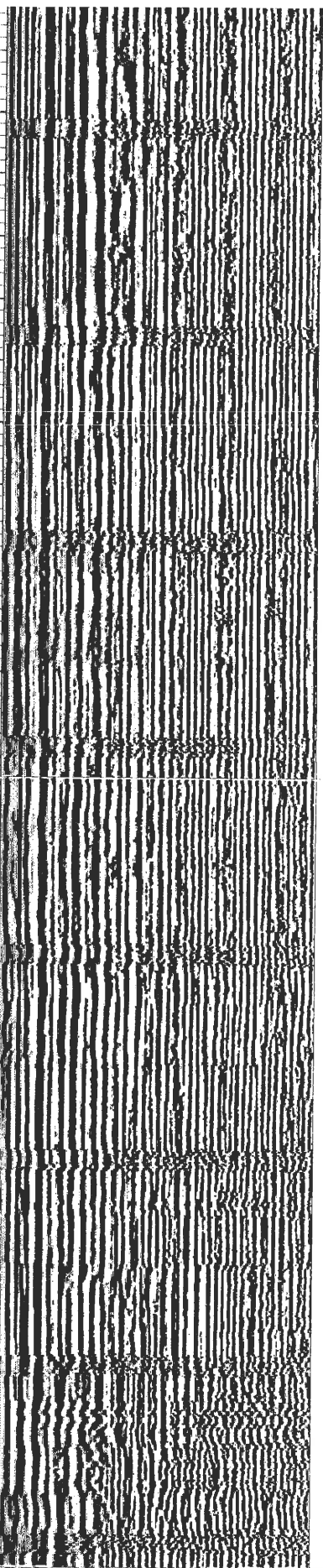
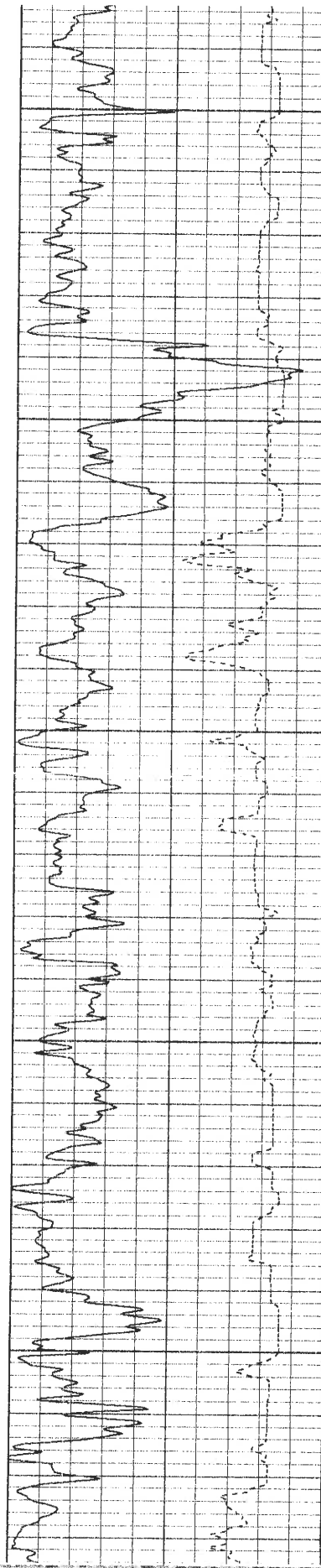
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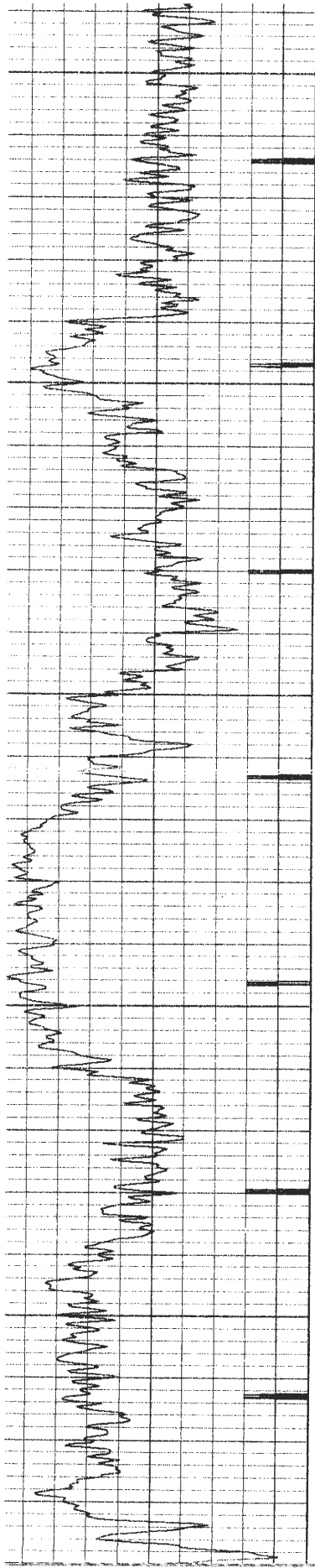
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1650

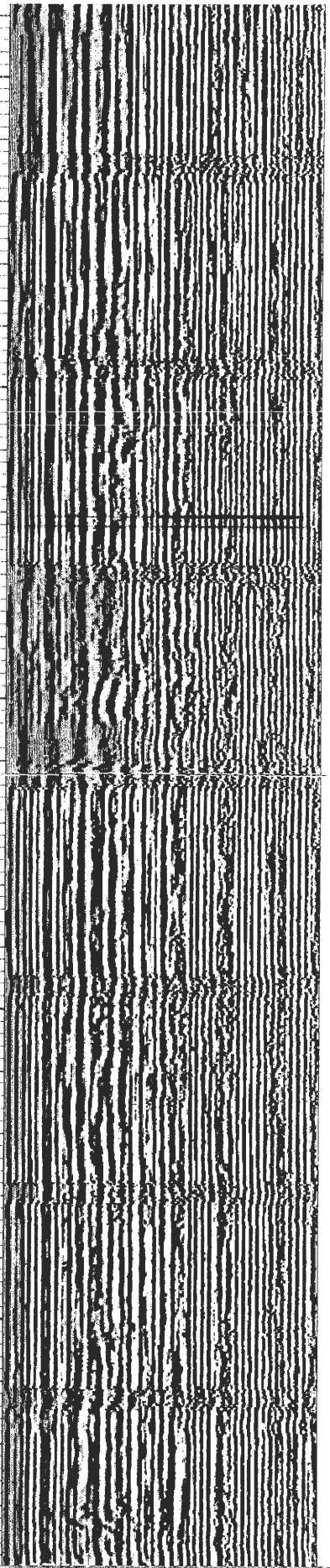
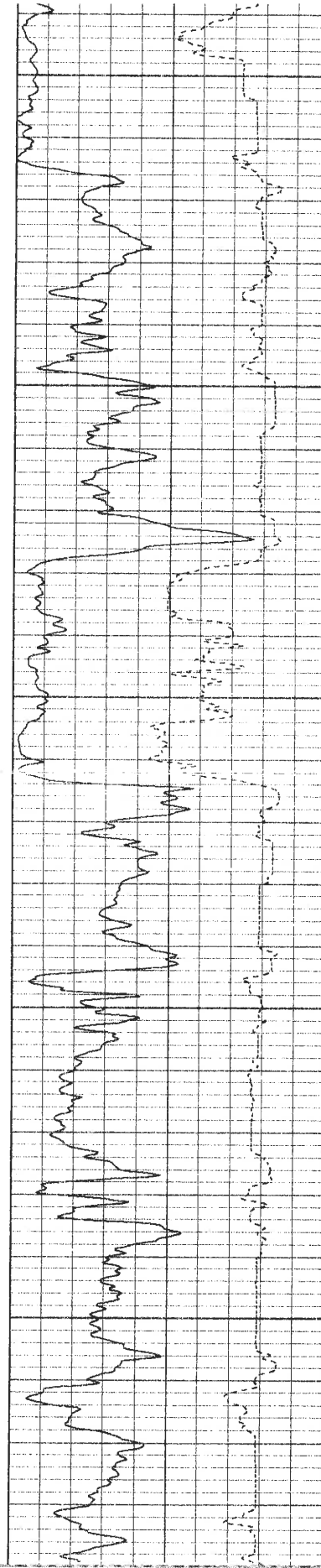
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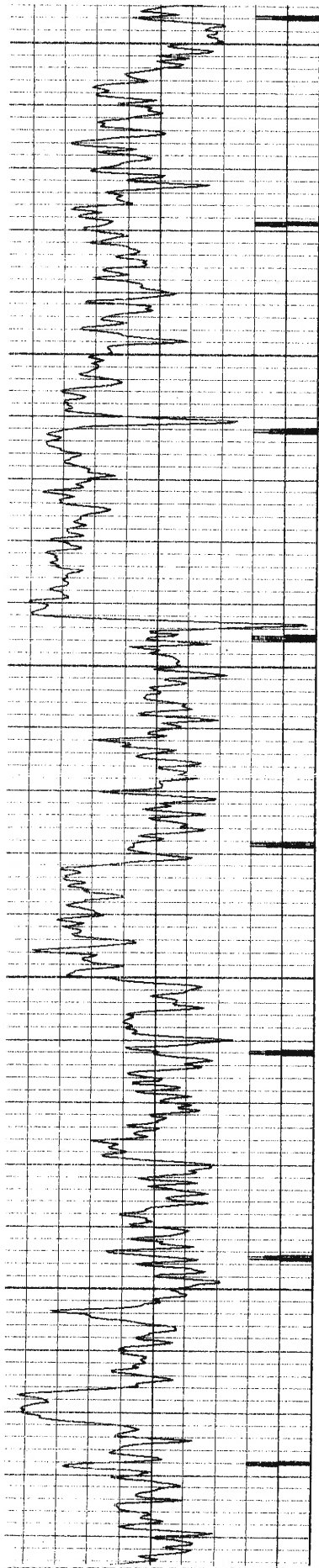
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1850  
1900  
1950  
2000





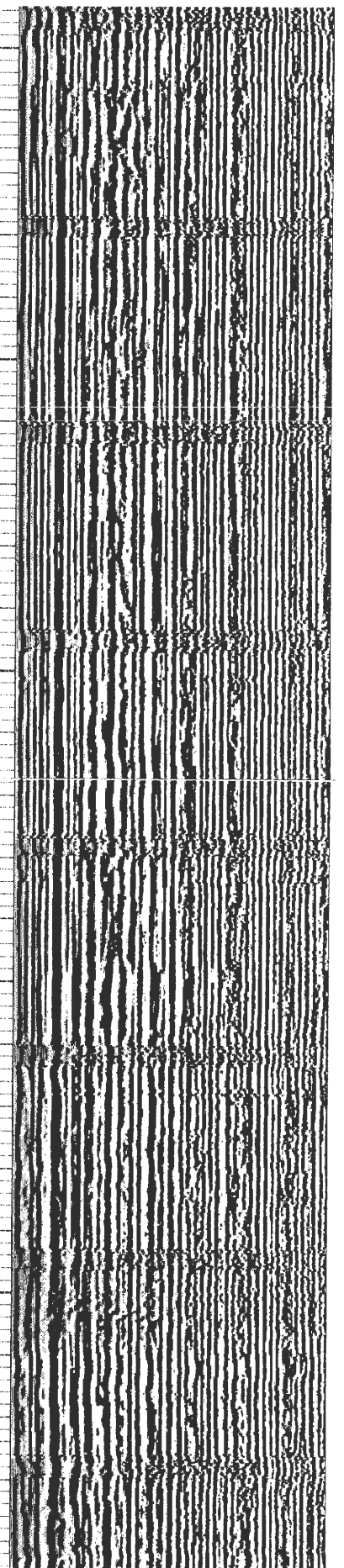
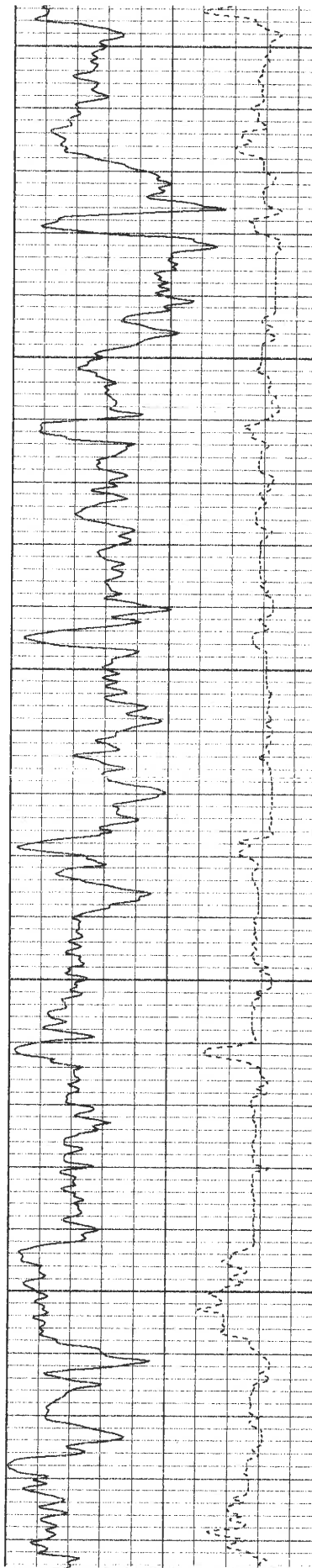
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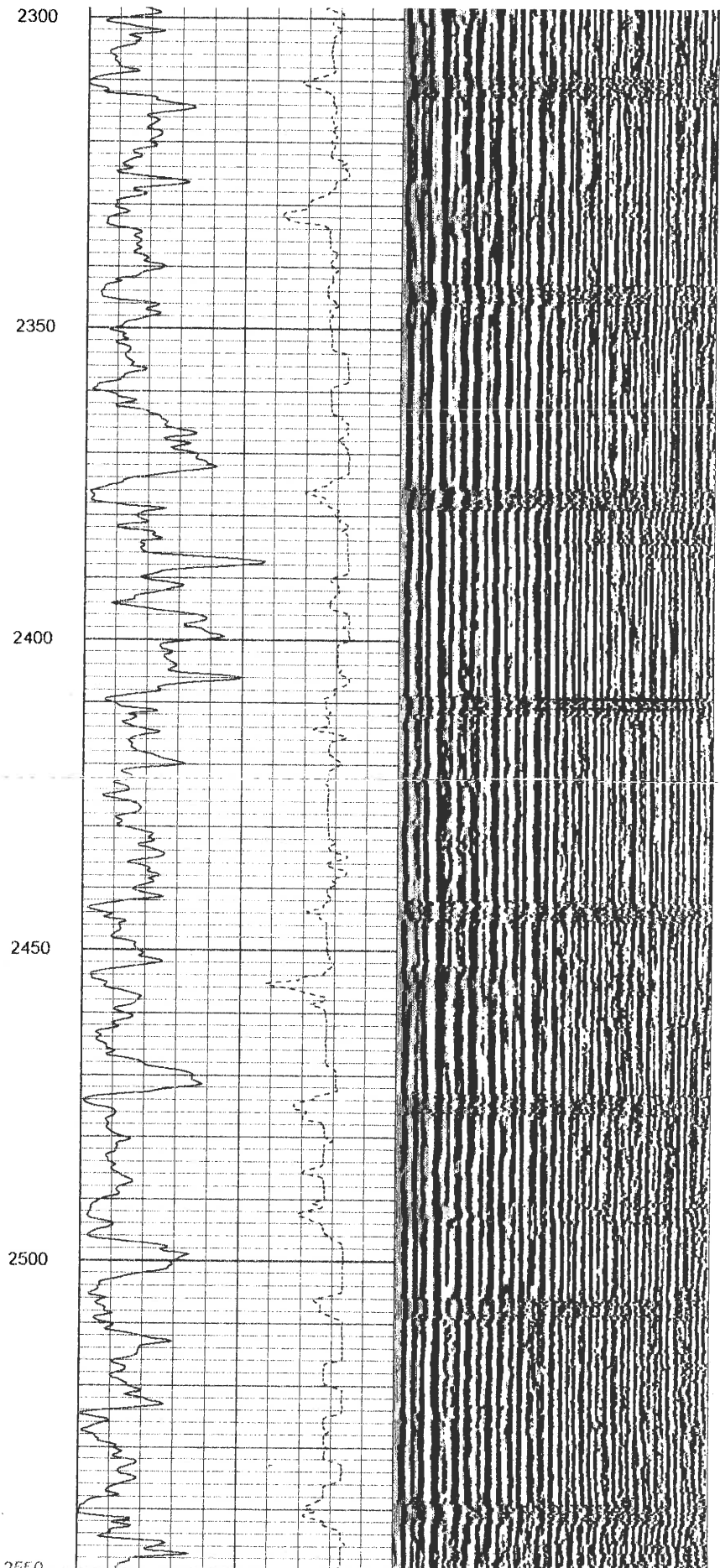
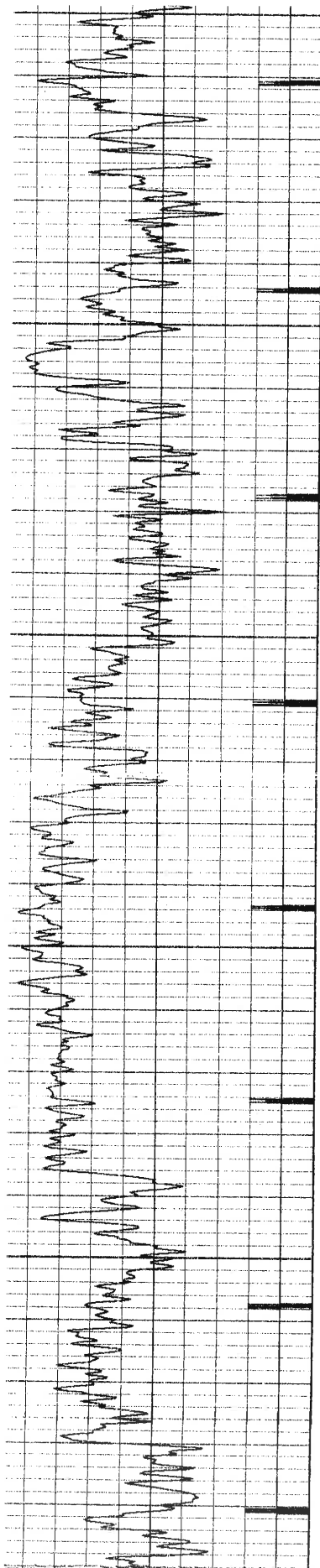
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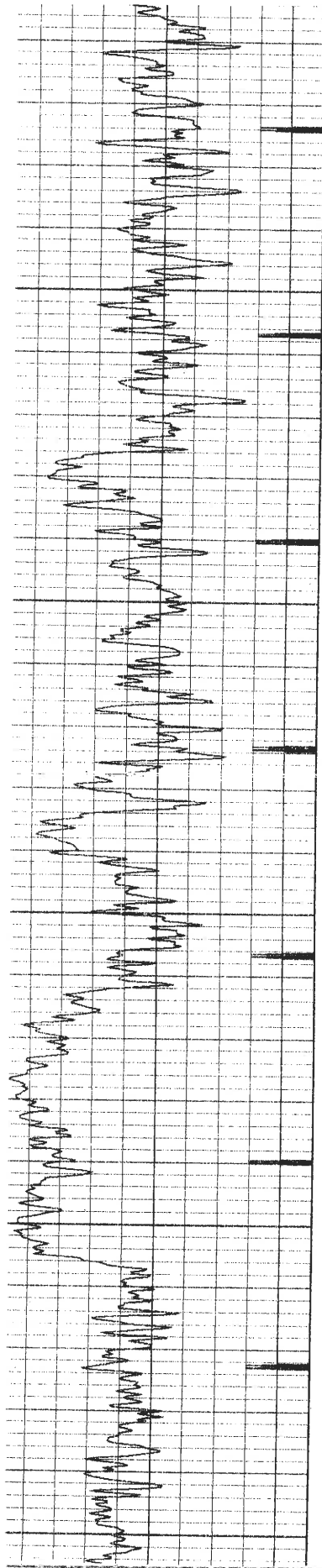
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2200

2250







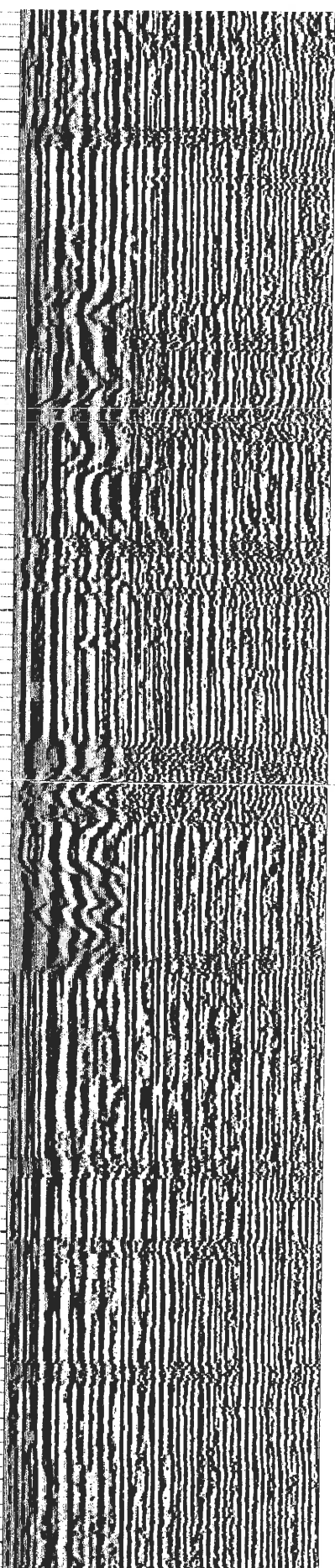
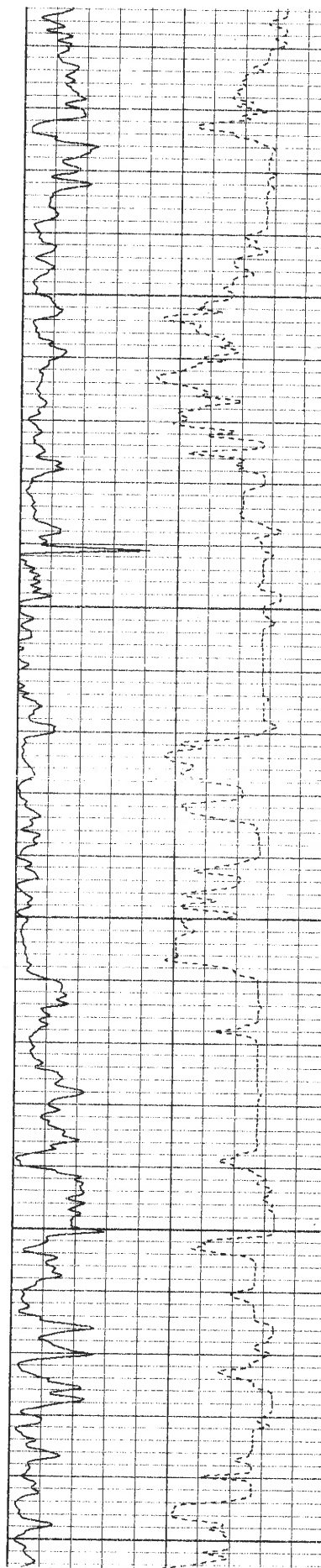
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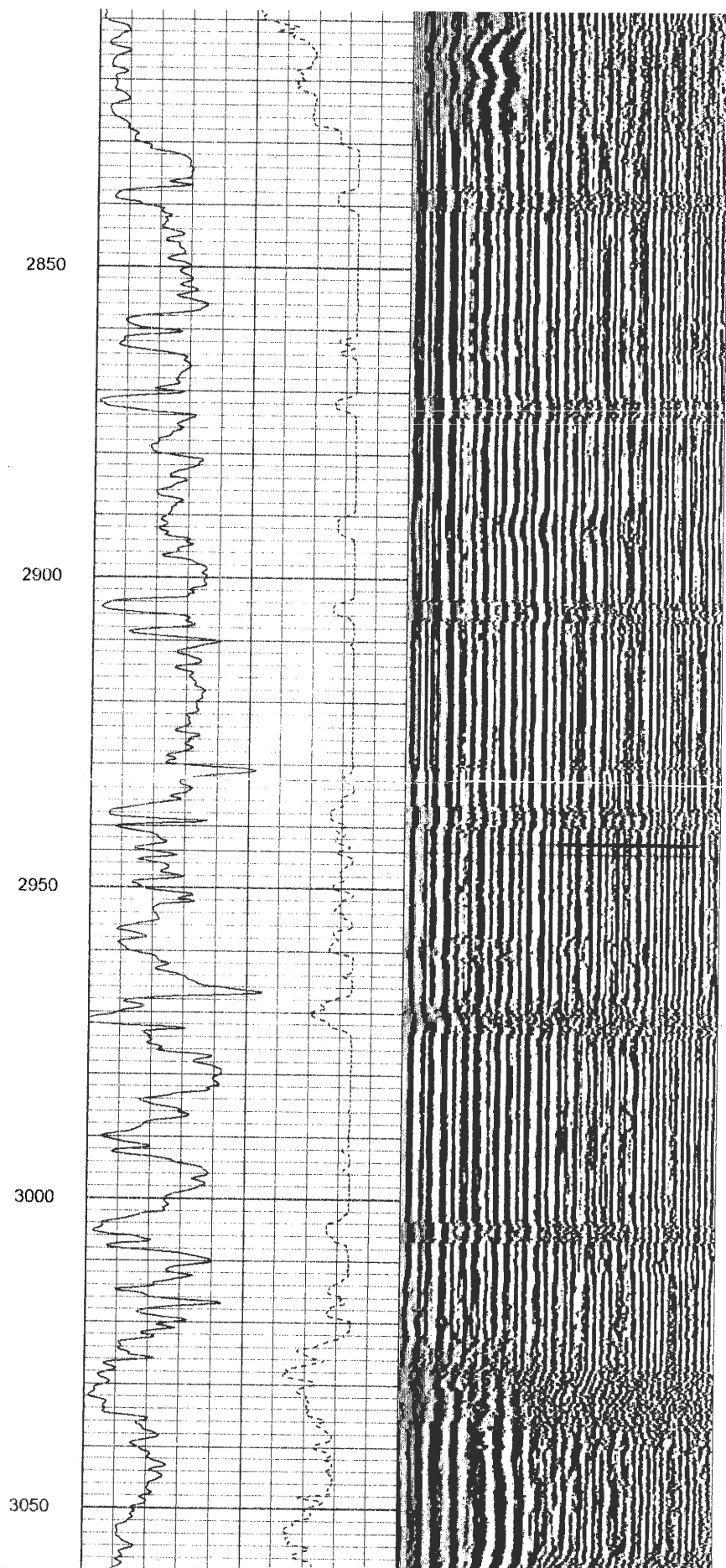
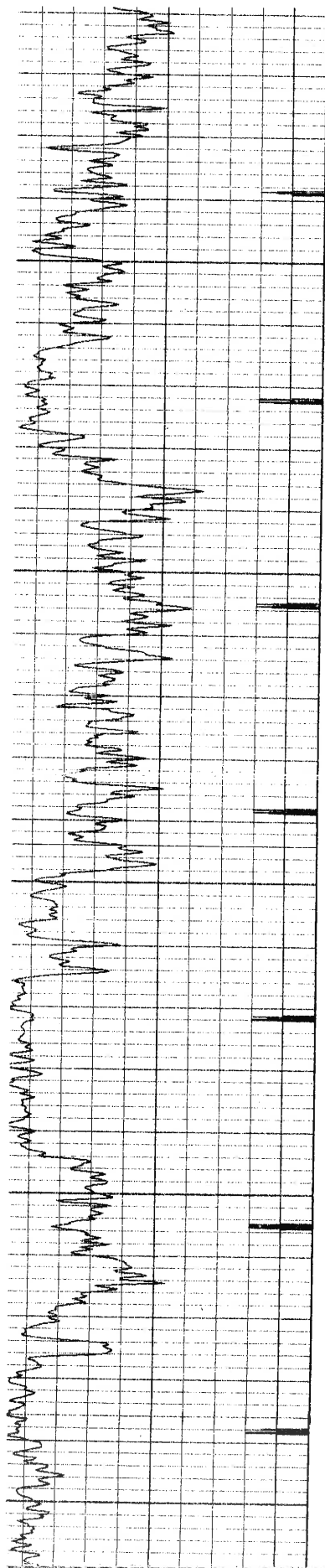
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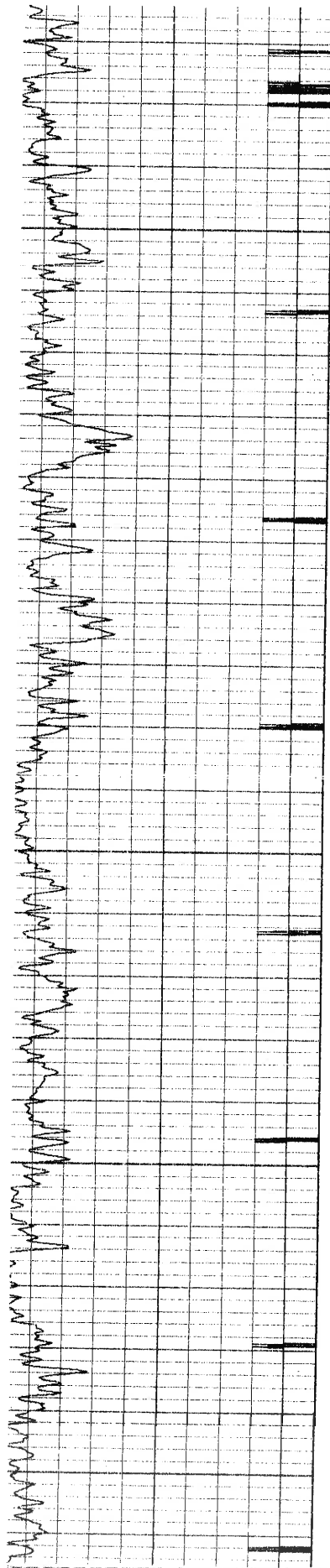
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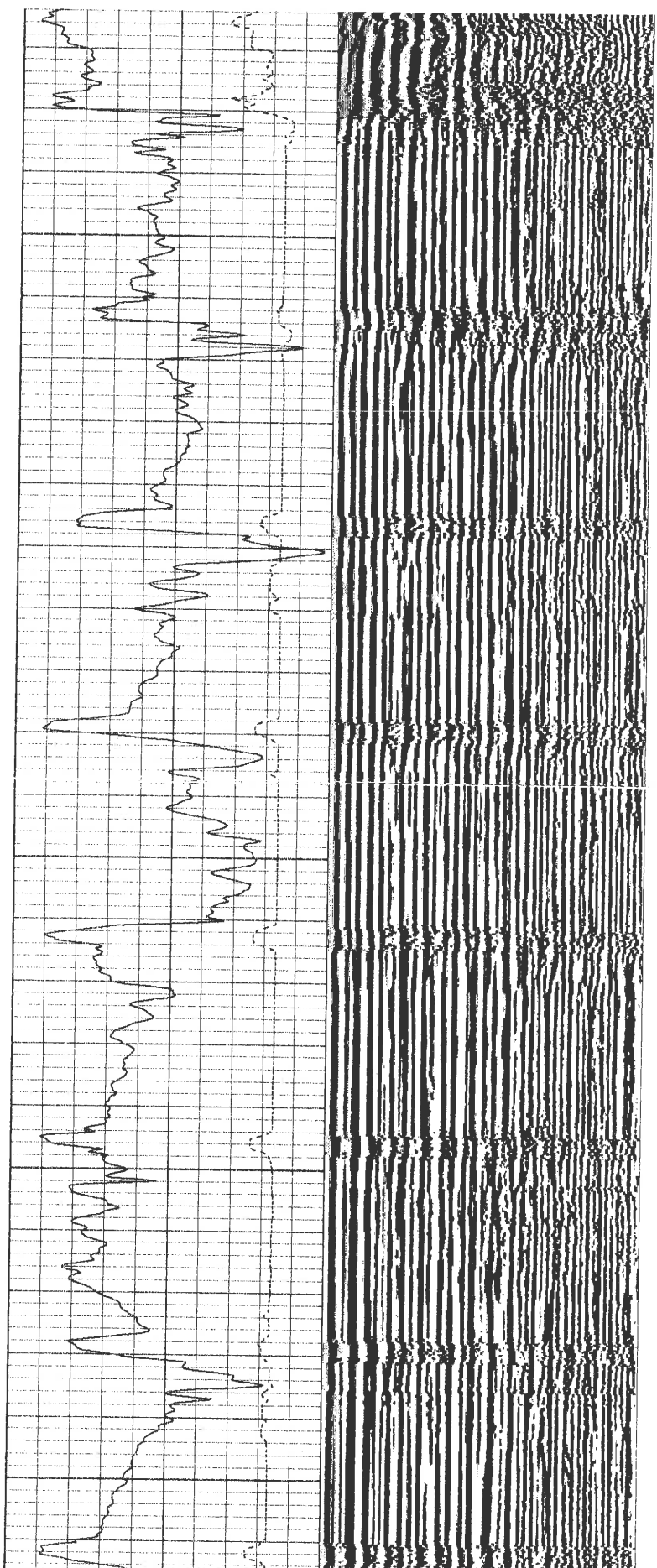
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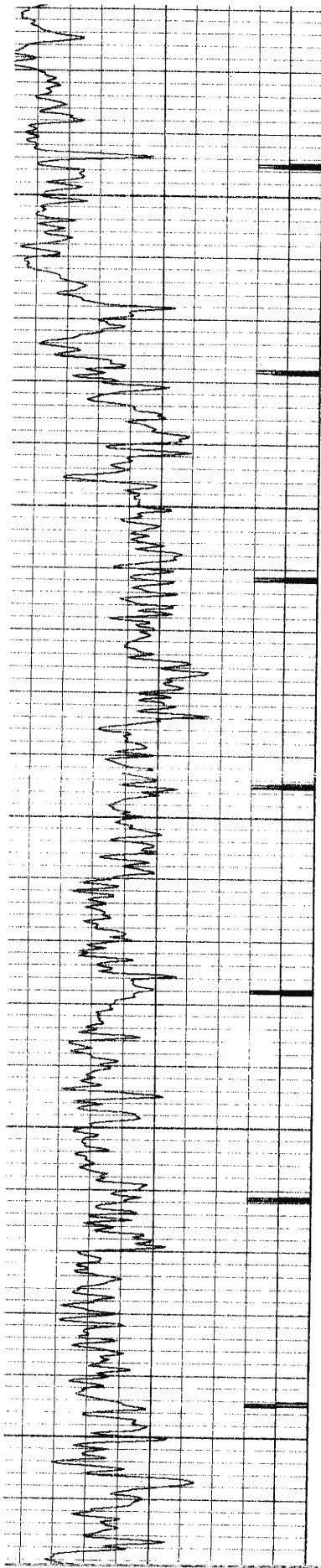




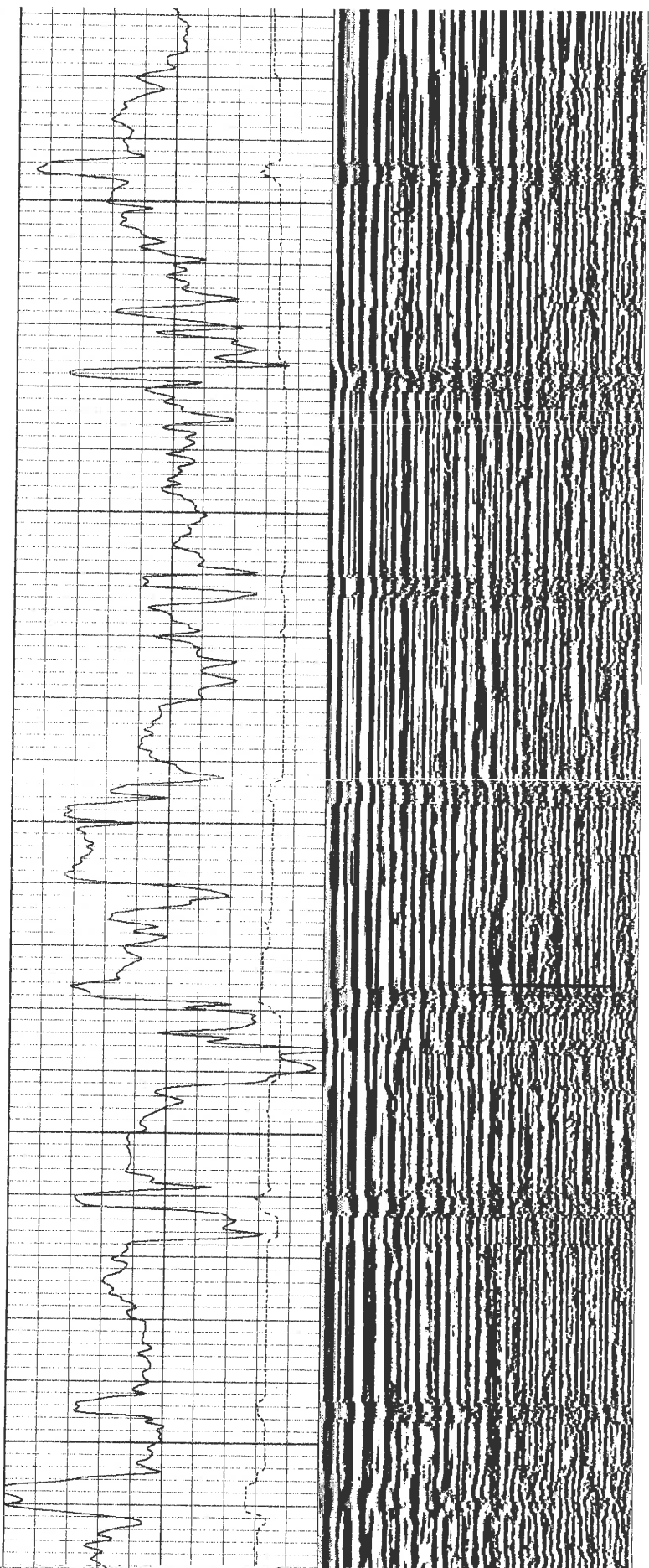


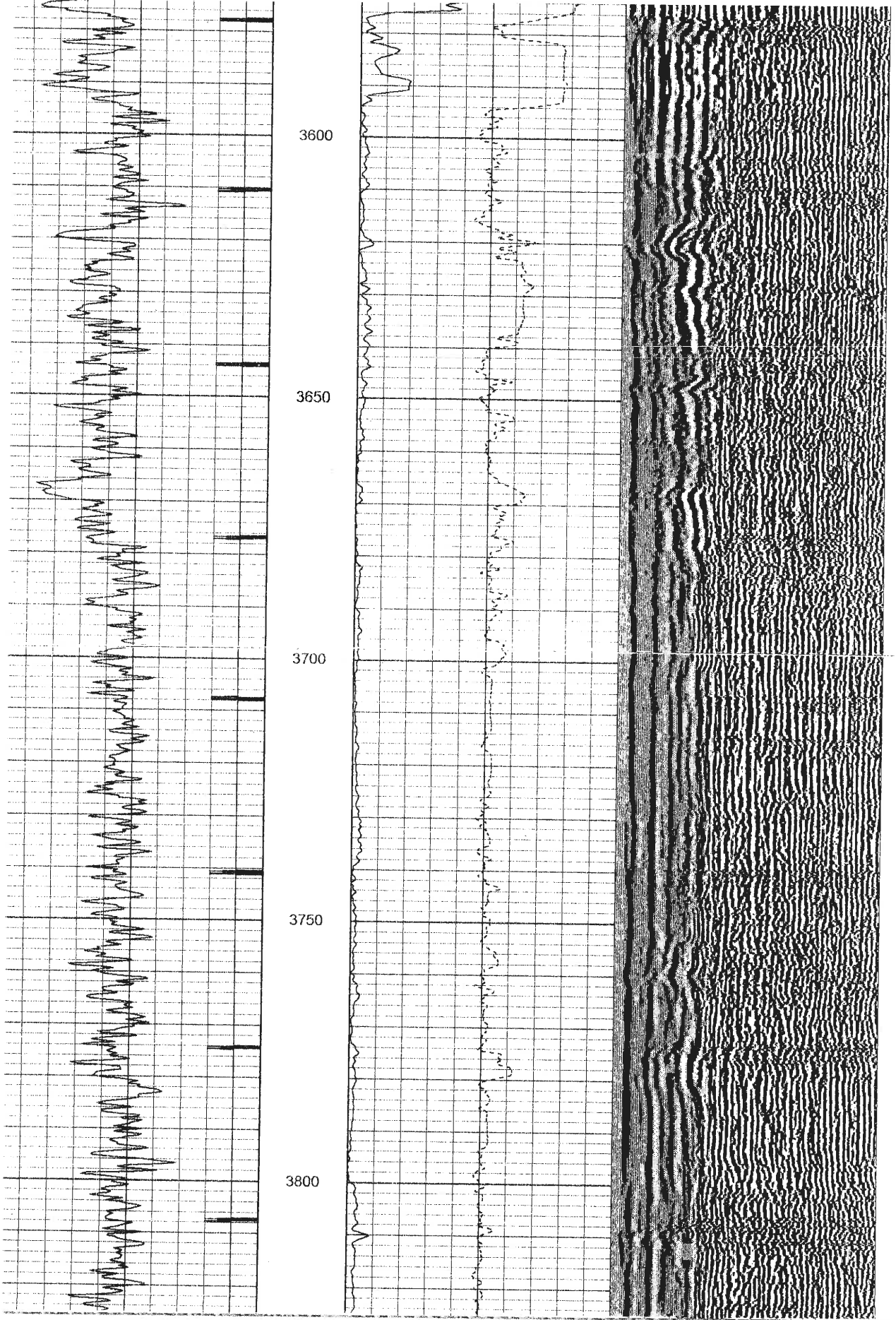
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3200  
3250  
3300

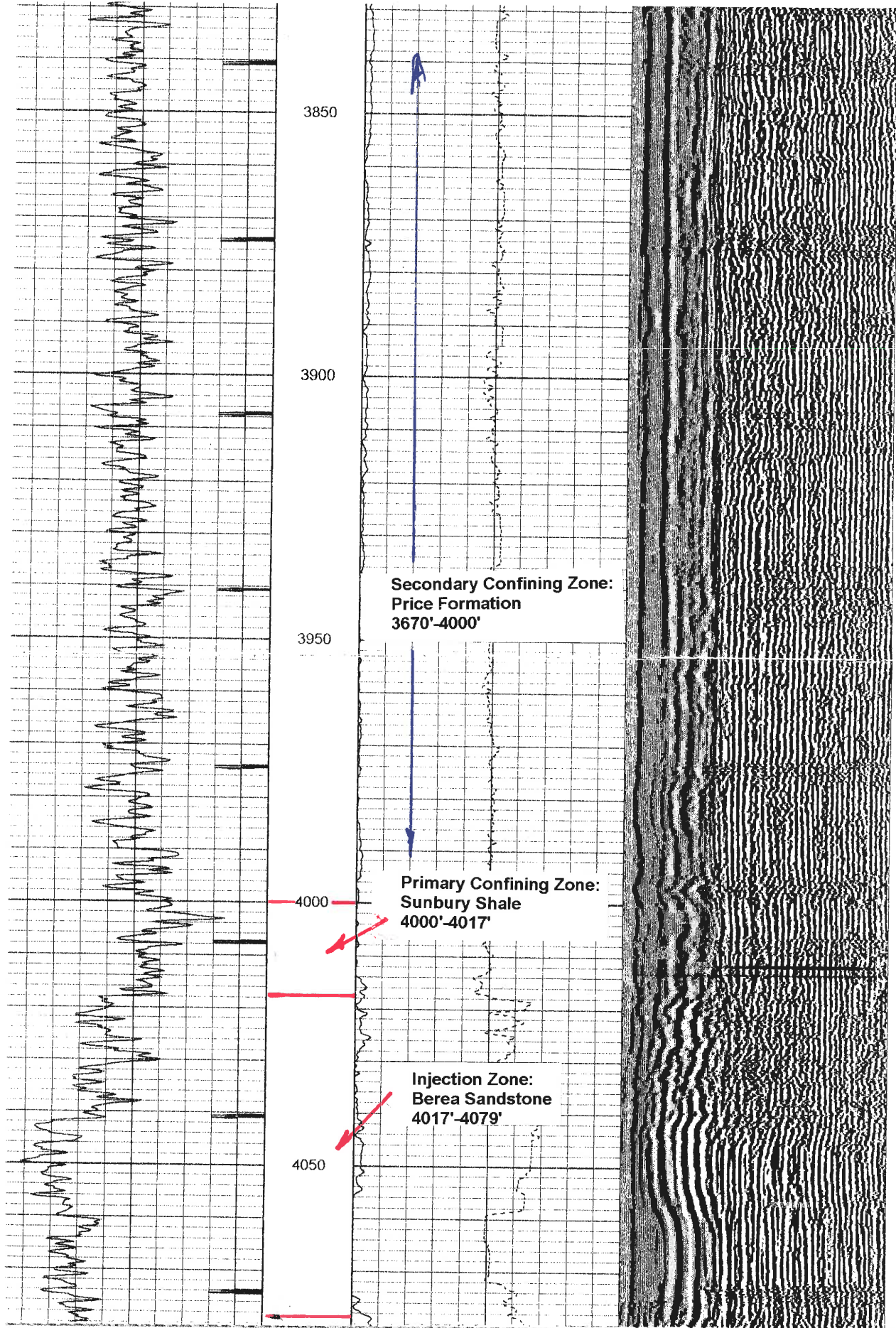




3350  
3400  
3450  
3500  
3550







3850

3900

3950

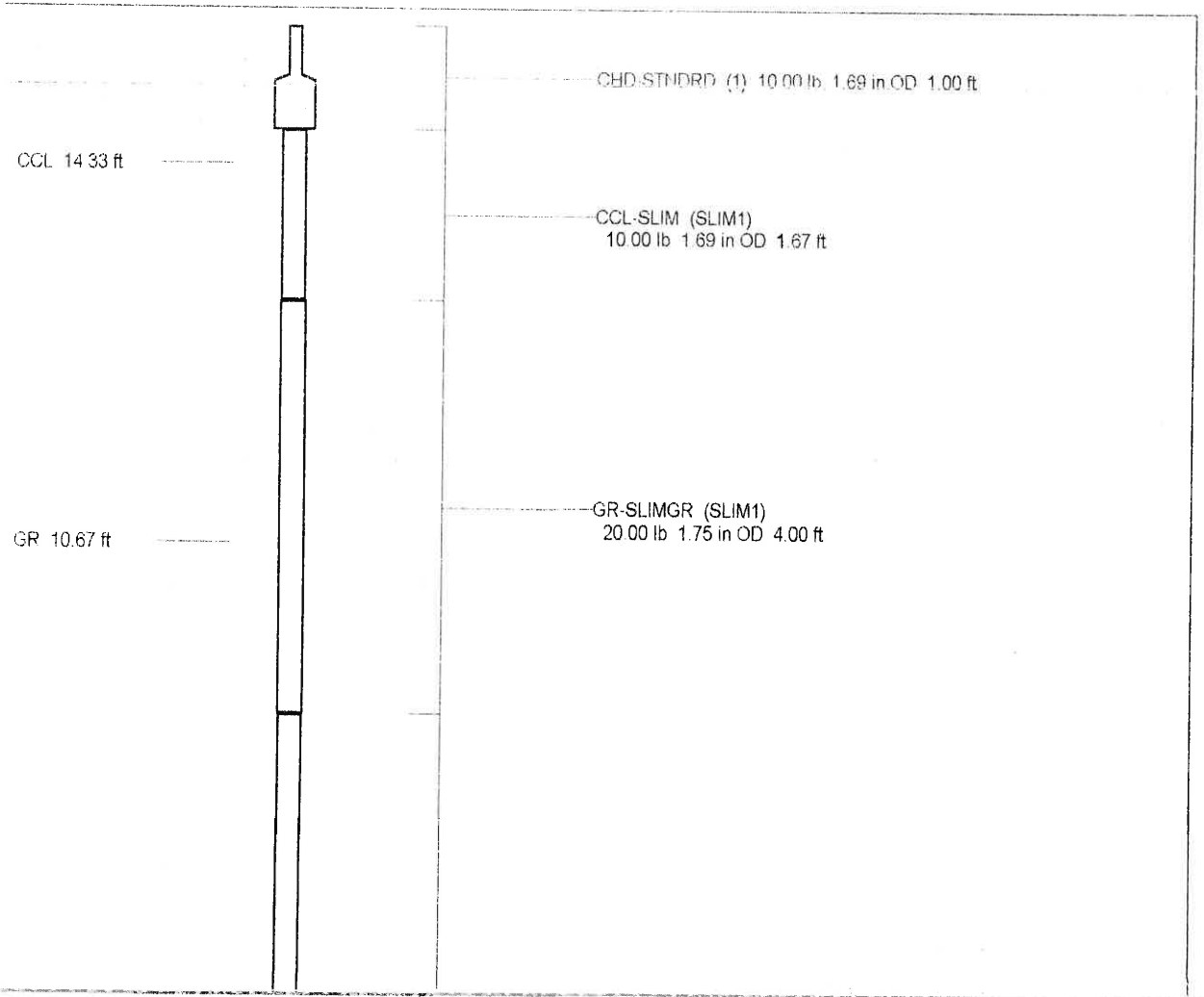
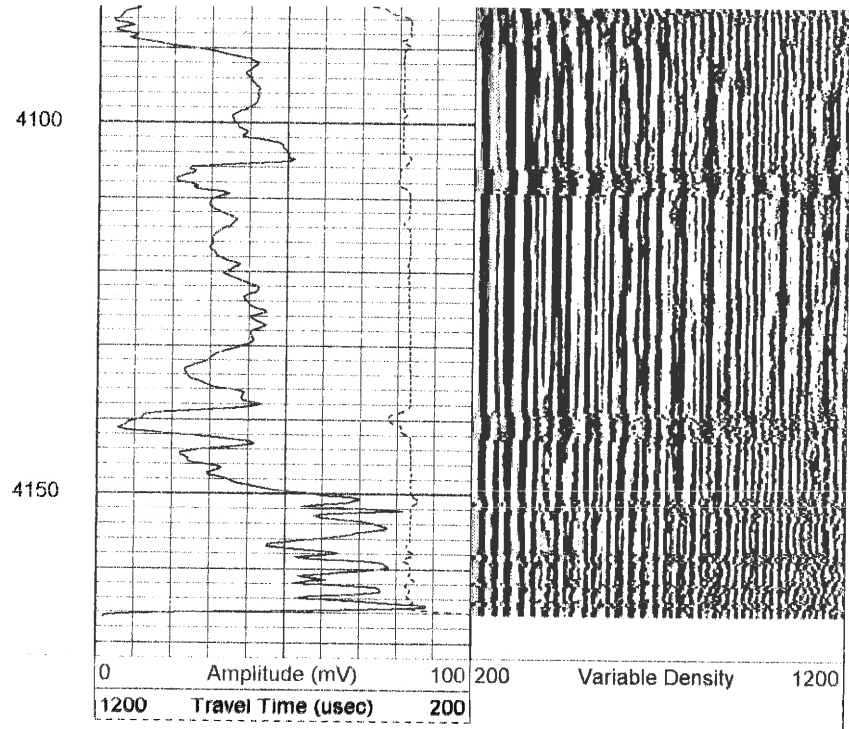
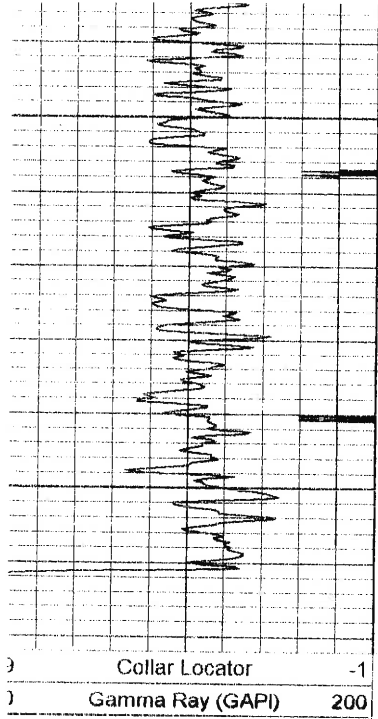
4000

4050

**Secondary Confining Zone:  
Price Formation  
3670'-4000'**

**Primary Confining Zone:  
Sunbury Shale  
4000'-4017'**

**Injection Zone:  
Berea Sandstone  
4017'-4079'**



113 6.00 ft  
WVF3 6.00 ft

CBL-SLIM (SLIM1)  
20.00 lb 1.69 in OD 9.00 ft

Dataset: run1/pass1  
Total Length: 15.67 ft  
Total Weight: 60.00 lb  
O.D.: 1.75 in

# **Section 9**

## **Operating Requirements**

## Section 9-Operating Requirements/Data

The Gilbert-Plumley A-55 has previously been permitted as a UIC Class 2D injection facility since 2003. Production casing of 4 ½" was run to a total depth of 4,183' with 2 3/8" tubing and compression packer set at 3,119'. Virgin reservoir pressures obtained from previous reports indicated the Berea formation pressure of 900 psig with a maximum injection pressure of 1,034 psig and 2,300 psig bottom hole pressure. Historically, approximately 85 barrels per hour were injected at this location. Projected use is estimated to be the same. Class II injection fluids stored in the seven ASTs uses use four types of filtration:

1. A 200 micron bag filter for removing heavy particulate matter.
2. A 50 micron bag type filter unit
3. A 20 micron cartridge type filter unit
4. A 5 micron cartridge type filter unit.

MIT inspections shall be performed a minimum of every five years or anytime service work is performed to the well or anytime routine daily/monthly inspections show the possibility of an integrity problem. Routine daily/monthly inspections shall consist of casing and tubing pressures monitoring, equipment and manifold, well head, tanks, containments and equipment inspections for corrosion and potential leaks. Monthly manifold and pipeline integrity step tests to 10% over the maximum permitted injection pressure. All daily/monthly inspections and test shall be recorded, logged and filed in the plant office. In the event of any suspected well, manifold or pipeline integrity problem, the well will be immediately shut in and injection activities shall cease with proper notifications being made to the OOG. In the event of any well integrity problem the well will be made "static" and evaluation of data shall be performed and remedial work will begin once a plan of action has been put into place. Any injection fluids shall be transported and disposed of in an alternated state approved disposal facility or permitted UIC Class 2D well. The MIT test was recently conducted in January 2015 along with setting a new packer at a depth of 4.028 feet. A copy of the WR-37 along with the MIT test chart is provided as an attachment.

Please find enclosed **Appendix G** that provides the list of wells serviced to this UIC permit.

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# **MIT Text and Previous Permit Approval**

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WR37

**MECHANICAL INTEGRITY TEST**

**Test Method:** 1/29/15 Rigged the pressure washer truck up to test the 4-1/2" casing annulus including the 2-3/8" tubing and packer. Pressured casing up to 1675 psig. The casing started losing pressure at an estimated rate of 45 psig a minute (did not communicate with tubing). Pressured the annulus back up and retested three more times. All three times had about the same bleed off rate. (Emergency Cement Squeeze) shut the well down and rigged up a service rig and closed the bottom hole valve and disconnected the tubing from the packer and j valve. Pulled the tubing out of the hole and went back in with a retrievable plug and packer combination, moved the packer down to 3194' and set it and pressured tested from 3194' to the original injection packer at 4028'. Pressured up to 1700 psig with no leak. Set the retrievable plug at 3220' and then set the packer at 2996' and tested from 2996'-3220'. Would not hold pressure, tested above the packer from 2996'-surface and 3 hole, removed packer and spotted 20' of sand on the retrievable plug and ran the tubing back in the hole to 3088' with 1.75 sacks of extra matrix cement, pulled tubing out of cement and reversed circulated then pulled out wire joints, set another packer near surface to anchor the tubing, pressured the cement up below the packer to 1575 psig. Three times with little leak off or movement and left at 1375 psig (squeeze pressure), let the cement setup for 3 days. Puffed out of hole with tubing and anchor packer, RHM with bit and scraper, drilled the corners out of the casing ran tubing back in the hole and retested the tubing casing packer and piping to the injection pump to 1713 psig on 1/29/15 and passed with no bleed off.

The undersigned certifies that the test was performed on 1/29/15, 20   and demonstrated mechanical integrity of the well. The test was witnessed by Danny Mullins representing the Office of Oil and Gas.

ARP Mountaineer Production, LLC.

Well Operator

1/29/15

Date

**THIS WELL IS AUTHORIZED FOR INJECTION.**

Signed

[Signature] OIC PROGRAM DIRECTOR

Date

2/23/2015

[NOTE: That the mechanical integrity of this well must be demonstrated again within ninety (90) days of five years from this date in order for injection to continue. Please notify the state inspector 24 hours in advance of the test].

ARP Mountaineer Production, LLC

Well Operator

By: Rocky Stowell

Its Regulatory Compliance Specialist

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**Appendix G**  
***Well Serviced by Injection Well***

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**Well Names & Permit Numbers**

| Well #      | File or Permit # |
|-------------|------------------|
| GPPC-006    | 047-01542        |
| GPPC-007    | 047-01543        |
| GPPC-008    | 047-01544        |
| GPPC-009    | 047-01545        |
| GPPC-010    | 047-01546        |
| GPPC-001    | 047-01555        |
| GPPC-002    | 047-01556        |
| GPPC-003    | 047-01557        |
| GPPC-004    | 047-01558        |
| GPPC-005    | 047-01559        |
| 104-103-015 | 047-01616        |
| 105-103-016 | 047-01617        |
| 103-104-018 | 047-01618        |
| 103-105-020 | 047-01619        |
| 103-106-022 | 047-01620        |
| 104-106-023 | 047-01621        |
| 105-106-024 | 047-01622        |
| 106-106-025 | 047-01623        |
| 103-107-027 | 047-01624        |
| 104-107-028 | 047-01625        |
| 106-107-029 | 047-01626        |
| 107-107-030 | 047-01627        |
| 104-108-34  | 047-01628        |
| 106-108-035 | 047-01629        |
| 107-108-036 | 047-01630        |
| 106-109-041 | 047-01661        |
| 107-109-042 | 047-01662        |
| 107-110-048 | 047-01663        |
| 107-111-054 | 047-01664        |
| 108-111-055 | 047-01665        |
| 104-109-039 | 047-01670        |
| 105-109-040 | 047-01671        |
| 105-110-046 | 047-01672        |
| 106-110-047 | 047-01673        |
| 108-110-049 | 047-01674        |
| 106-111-053 | 047-01675        |
| 109-111-056 | 047-01676        |
| 107-112-059 | 047-01677        |
| 103-103-014 | 047-01697        |
| 108-108-037 | 047-01698        |
| 108-109-043 | 047-01699        |
| 109-109-044 | 047-01700        |
| 104-110-045 | 047-01701        |
| 109-110-050 | 047-01702        |
| 104-111-051 | 047-01703        |
| 105-111-052 | 047-01704        |
| 106-112-058 | 047-01705        |

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| 105-113-061 | <u>047-01706</u> |
| 105-112-057 | <u>047-01713</u> |
| 106-113-062 | <u>047-01715</u> |
| 107-113-063 | <u>047-01716</u> |
| 105-112-064 | <u>047-01717</u> |
| 109-108-038 | <u>047-01727</u> |
| 110-108-065 | <u>047-01748</u> |
| 111-108-066 | <u>047-01749</u> |
| 109-105-067 | <u>047-01750</u> |
| 107-103-068 | <u>047-01757</u> |
| 108-103-069 | <u>047-01758</u> |
| 109-103-070 | <u>047-01759</u> |
| 109-103-071 | <u>047-01760</u> |
| 110-103-072 | <u>047-01761</u> |
| 111-103-073 | <u>047-01762</u> |
| 108-104-076 | <u>047-01764</u> |
| 108-104-077 | <u>047-01765</u> |
| 110-104-078 | <u>047-01766</u> |
| 110-104-079 | <u>047-01767</u> |
| 110-104-080 | <u>047-01768</u> |
| 110-105-084 | <u>047-01770</u> |
| 111-105-085 | <u>047-01771</u> |
| 107-104-075 | <u>047-01775</u> |
| 111-104-081 | <u>047-01776</u> |
| 106-105-082 | <u>047-01777</u> |
| 109-107-032 | <u>047-01778</u> |
| 110-107-033 | <u>047-01779</u> |
| 111-105-087 | <u>047-01780</u> |
| 112-105-088 | <u>047-01781</u> |
| 106-104-074 | <u>047-01782</u> |
| 109-105-098 | <u>047-01783</u> |
| 112-103-089 | <u>047-01784</u> |
| 113-103-090 | <u>047-01785</u> |
| 113-102-102 | <u>047-01786</u> |
| 115-104-103 | <u>047-01804</u> |
| 114-105-104 | <u>047-01805</u> |
| 115-105-105 | <u>047-01806</u> |
| 113-106-108 | <u>047-01807</u> |
| 115-106-110 | <u>047-01808</u> |
| 116-106-111 | <u>047-01809</u> |
| 114-106-109 | <u>047-01812</u> |
| 116-105-106 | <u>047-01814</u> |
| 117-105-107 | <u>047-01815</u> |
| 117-106-112 | <u>047-01816</u> |
| 102-103-013 | <u>047-01819</u> |
| 102-104-017 | <u>047-01820</u> |
| 102-105-019 | <u>047-01821</u> |
| 109-104-086 | <u>047-01824</u> |
| 110-105-083 | <u>047-01825</u> |
| 107-106-026 | <u>047-01830</u> |
| 108-107-031 | <u>047-01831</u> |
| 112-103-091 | <u>047-01832</u> |

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| 114-102-099 | <u>047-01833</u> |
| 115-103-100 | <u>047-01834</u> |
| 116-105-101 | <u>047-01835</u> |
| 111-107-119 | <u>047-01837</u> |
| 111-108-120 | <u>047-01838</u> |
| 116-119-090 | <u>047-01844</u> |
| 105-106-125 | <u>047-01876</u> |
| 107-106-126 | <u>047-01877</u> |
| 106-109-127 | <u>047-01878</u> |
| 114-102-133 | <u>047-01879</u> |
| 114-107-148 | <u>047-01894</u> |
| 111-108-149 | <u>047-01895</u> |
| 110-108-150 | <u>047-01896</u> |
| 103-106-123 | <u>047-01901</u> |
| 112-105-132 | <u>047-01902</u> |
| 102-104-122 | <u>047-01918</u> |
| 101-103-121 | <u>047-01926</u> |
| 104-104-152 | <u>047-01927</u> |
| 110-106-154 | <u>047-01933</u> |
| 110-109-157 | <u>047-01934</u> |
| 108-105-135 | <u>047-01939</u> |
| 108-106-140 | <u>047-01940</u> |
| 112-102-143 | <u>047-01941</u> |
| 112-101-145 | <u>047-01942</u> |
| 112-102-146 | <u>047-01943</u> |
| 107-104-134 | <u>047-01952</u> |
| 107-105-136 | <u>047-01953</u> |
| 108-105-137 | <u>047-01954</u> |
| 108-106-138 | <u>047-01955</u> |
| 109-106-139 | <u>047-01956</u> |
| 100-104-158 | <u>047-01957</u> |
| 102-105-161 | <u>047-01958</u> |
| 102-106-162 | <u>047-01959</u> |
| 102-107-163 | <u>047-01960</u> |
| 108-109-128 | <u>047-01981</u> |
| 103-107-124 | <u>047-01982</u> |
| 101-102-129 | <u>047-02000</u> |
| 102-102-159 | <u>047-02006</u> |
| 101-104-203 | <u>047-02048</u> |
| 98-104-178  | <u>047-02050</u> |
| 98-105-179  | <u>047-02051</u> |
| 99-104-172  | <u>047-02056</u> |
| 100-104-173 | <u>047-02057</u> |
| 100-105-174 | <u>047-02058</u> |
| 99-103-216  | <u>047-02060</u> |
| 100-103-171 | <u>047-02063</u> |
| CDJ-217     | <u>047-02068</u> |
| 99-107-184  | <u>047-02069</u> |
| 99-108-185  | <u>047-02070</u> |
| 100-108-186 | <u>047-02073</u> |
| 101-108-187 | <u>047-02078</u> |
| 101-108-188 | <u>047-02081</u> |

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| 102-108-204     | <u>047-02082</u> |
| 102-102-208     | <u>047-02083</u> |
| 104-103-130     | <u>047-02085</u> |
| 101-106-175     | <u>047-02088</u> |
| 102-109-196     | <u>047-02089</u> |
| 105-103-131     | <u>047-02093</u> |
| 99-106-183      | <u>047-02105</u> |
| POND CREEK 536  | <u>047-02174</u> |
| POND CREEK 537  | <u>047-02175</u> |
| POND CREEK 539  | <u>047-02176</u> |
| POND CREEK 540  | <u>047-02177</u> |
| POND CREEK 538  | <u>047-02197</u> |
| POND CREEK 544  | <u>047-02198</u> |
| PMC SOUTH 541   | <u>047-02200</u> |
| PMC SOUTH 542   | <u>047-02201</u> |
| POND CREEK 545  | <u>047-02208</u> |
| ROGERS 570      | <u>047-02212</u> |
| JEWELL 219      | <u>047-02214</u> |
| POND CREEK 559  | <u>047-02215</u> |
| ROGERS 190      | <u>047-02241</u> |
| ROGERS 205      | <u>047-02242</u> |
| ROGERS 160      | <u>047-02246</u> |
| ROGERS 191      | <u>047-02247</u> |
| CDJ-548         | <u>047-02248</u> |
| CDJ 220 WV-L22  | <u>047-02256</u> |
| CDJ 535 WV-L21  | <u>047-02257</u> |
| ROGERS 182      | <u>047-02258</u> |
| ROGERS 546      | <u>047-02264</u> |
| JEWELL 549      | <u>047-02268</u> |
| ROGERS 575      | <u>047-02269</u> |
| ROGERS 223      | <u>047-02277</u> |
| ROGERS 193      | <u>047-02278</u> |
| ROGERS 230      | <u>047-02279</u> |
| ROGERS 195      | <u>047-02280</u> |
| ROGERS 577      | <u>047-02281</u> |
| ROGERS 533      | <u>047-02295</u> |
| ROGERS 571      | <u>047-02296</u> |
| ROGERS 579      | <u>047-02297</u> |
| ROGERS 572      | <u>047-02308</u> |
| ROGERS 580      | <u>047-02313</u> |
| ROGERS 581      | <u>047-02314</u> |
| ROGERS 194      | <u>047-02320</u> |
| ROGERS 206      | <u>047-02321</u> |
| ROGERS 582      | <u>047-02322</u> |
| 254 WV-P21B CDJ | <u>047-02358</u> |
| 225 WV-Q25      | <u>047-02387</u> |
| 226 WV-R27      | <u>047-02388</u> |
| 228 WV-R23      | <u>047-02389</u> |
| 235 WV-Q24      | <u>047-02390</u> |
| 259 WV-S16 CDJ  | <u>047-02391</u> |
| 261 WV-T17 CDJ  | <u>047-02392</u> |
| 300 WV-Q27      | <u>047-02394</u> |

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|----------------|------------------|
| 323 WV-R12B    | <u>047-02395</u> |
| 326 WV-R12     | <u>047-02396</u> |
| 222 WV-Q26     | <u>047-02419</u> |
| 229 WV-R22     | <u>047-02420</u> |
| 256 WV-S21     | <u>047-02421</u> |
| 257 WV-R22B    | <u>047-02435</u> |
| 600 WV-R21     | <u>047-02436</u> |
| 234 WV-Q-21B   | <u>047-02472</u> |
| 192 WV-O21     | <u>047-02556</u> |
| 170 WV-G23     | <u>047-02557</u> |
| 176 WV-N26     | <u>047-02584</u> |
| 626 WV-G25     | <u>047-02585</u> |
| H21 ROGERS     | <u>047-02591</u> |
| H20 ROGERS     | <u>047-02592</u> |
| 624 WV-F24     | <u>047-02595</u> |
| 627 WV-H23     | <u>047-02596</u> |
| 630 WV-022     | <u>047-02612</u> |
| 631 WV-N20     | <u>047-02613</u> |
| 632 WV-N19     | <u>047-02614</u> |
| 221 WV-026     | <u>047-02615</u> |
| 625 WV-F26     | <u>047-02625</u> |
| 629 WV-P23     | <u>047-02627</u> |
| 377 WV-022     | <u>047-02629</u> |
| 634 WV-P23B    | <u>047-02630</u> |
| 639 WV-K30C PC | <u>047-02655</u> |
| 560 WV-K35 PMC | <u>047-02657</u> |
| 573 WV-134 PMC | <u>047-02658</u> |
| 640 WV-L30 PC  | <u>047-02668</u> |
| 605B WV-F38 PC | <u>047-02687</u> |
| 122-145-002    | <u>109-02213</u> |
| 117 WV-III 52  | <u>109-02917</u> |
| 049 WV-JJJ     | <u>109-02918</u> |
| 038 WV KKK     | <u>109-02948</u> |
| 039 WV KKK     | <u>109-02949</u> |
| 041 WV KKK     | <u>109-02950</u> |
| 050 WV JJJ     | <u>109-02951</u> |
| 108 WV JJJ     | <u>109-02952</u> |
| 107 WV JJJ     | <u>109-02953</u> |
| 040 WV KKK     | <u>109-02963</u> |
| 031 WV LLL     | <u>109-02965</u> |
| 061 WV III     | <u>109-02966</u> |
| 037 WV KKK     | <u>109-02968</u> |
| 048 WV JJJ     | <u>109-02969</u> |
| 103 WV KKK     | <u>109-02970</u> |
| 109 WV JJJ     | <u>109-02971</u> |
| 115 WV III     | <u>109-02972</u> |
| 116 WV III     | <u>109-02973</u> |

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**Appalachian Energy, Inc. Well Listing: Buchanan & Dickenson Co's, VA & McDowell Co, WV**  
March 12, 2013

| File or Permit #                                                      | Well # | Tank Battery        |
|-----------------------------------------------------------------------|--------|---------------------|
| <b><u>BUCHANAN CO, VA WELLS (CBM &amp; CONVENTIONAL NAT. GAS)</u></b> |        |                     |
| BU-0244                                                               | EH-8   | *                   |
| BU-0248                                                               | EH-9   | AE-156 Tank         |
| BU-0249                                                               | EH-10  | *                   |
| BU-0247                                                               | EH-11  | *                   |
| BU-0251                                                               | EH-12  | *                   |
| BU-0252                                                               | EH-13  | AE-193 Tank Battery |
| BU-0250                                                               | EH-15  | *                   |
| BU-0257                                                               | EH-16  | *                   |
| BU-0258                                                               | EH-17  | *                   |
| BU-0262                                                               | EH-19  | *                   |
| BU-0279                                                               | EH-28  | *                   |
| BU-0316                                                               | EH-29  | *                   |
| BU-0291                                                               | EH-30  | *                   |
| BU-0325                                                               | EH-31  | *                   |
| BU-0299                                                               | EH-32  | *                   |
| BU-0281                                                               | EH-33  | *                   |
| BU-0270                                                               | EH-34  | *                   |
| BU-0276                                                               | EH-35  | *                   |
| BU-0314                                                               | EH-36  | *                   |
| BU-0413                                                               | EH-42  | *                   |
| BU-0410                                                               | EH-43  | *                   |
| BU-0414                                                               | EH-44  | EH-44 Tank Battery  |
| BU-0419                                                               | EH-46  | EH-46 Tank Battery  |
| BU-0415                                                               | EH-47  | *                   |
| A39BU                                                                 | EH-58  | *                   |
| A38BU                                                                 | EH-59  | *                   |
| A42BU                                                                 | EH-60  | *                   |
| A43BU                                                                 | EH-61  | *                   |
| A14BU                                                                 | EH-62  | *                   |
| A41BU                                                                 | EH-63  | *                   |
| BU-0368                                                               | EH-74  | *                   |
| BU-0659                                                               | EH-81  | *                   |
| BU-0661                                                               | EH-82  | *                   |
| BU-0564                                                               | EH-112 | *                   |
| BU-0572                                                               | EH-114 | *                   |
| BU-0571                                                               | EH-116 | *                   |
| A12BU                                                                 | EH-135 | *                   |
| BU-0025                                                               | EH-136 | *                   |
| BU-0015                                                               | EH-137 | *                   |
| BU-0020                                                               | EH-138 | *                   |
| BU-0026                                                               | EH-139 | *                   |
| BU-0030                                                               | EH-140 | *                   |
| A32BU                                                                 | EH-141 | *                   |
| A05BU                                                                 | EH-142 | *                   |
| BU-0010                                                               | EH-143 | *                   |
| BU-0014                                                               | EH-144 | *                   |
| BU-0022                                                               | EH-145 | *                   |
| BU-2671                                                               | AE-146 | AE-146 Tank Battery |
| BU-2952                                                               | AE-147 | AE-147 Tank Battery |

\* = produced water tank located at wellsite

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| <u>File or Permit #</u>                                               | <u>Well #</u> | <u>Tank Battery</u>                   |
|-----------------------------------------------------------------------|---------------|---------------------------------------|
| <b><u>BUCHANAN CO. VA WELLS (CBM &amp; CONVENTIONAL NAT. GAS)</u></b> |               |                                       |
|                                                                       |               | <b><u>(CONTINUED FROM PAGE 1)</u></b> |
| BU-2953                                                               | AE-148        | AE-147 Tank Battery                   |
| BU-2954                                                               | AE-149        | AE-147 Tank Battery                   |
| BU-3716                                                               | AE-150        | *                                     |
| BU-3875                                                               | AE-152        | AE-166 / Radar Hill Rd Tank Battery   |
| BU-3845                                                               | AE-153        | AE-166 / Radar Hill Rd Tank Battery   |
| BU-3858                                                               | AE-154        | AE-154 Tank Battery                   |
| BU-3579                                                               | AE-155        | AE-155 Tank Battery                   |
| BU-3243                                                               | AE-156        | AE-156 Tank                           |
| BU-3196                                                               | AE-157        | *                                     |
| BU-3245                                                               | AE-158        | *                                     |
| BU-3182                                                               | AE-159        | *                                     |
| BU-3242                                                               | AE-160        | *                                     |
| BU-3867                                                               | AE-161        | AE-154 Tank Battery                   |
| BU-3603                                                               | AE-162        | AE-191 Tank Battery                   |
| BU-3693                                                               | AE-163        | AE-155 Tank Battery                   |
| BU-3211                                                               | AE-164        | *                                     |
| BU-3280                                                               | AE-165        | AE-169 Tank Battery                   |
| BU-3246                                                               | AE-166        | AE-166 / Radar Hill Rd Tank Battery   |
| BU-3262                                                               | AE-167        | AE-169 Tank Battery                   |
| BU-3524                                                               | AE-168        | AE-169 Tank Battery                   |
| BU-3247                                                               | AE-169        | AE-169 Tank Battery                   |
| BU-3888                                                               | AE-170        | AE-154 Tank Battery                   |
| BU-3591                                                               | AE-174        | AE-154 Tank Battery                   |
| BU-3197                                                               | AE-175        | *                                     |
| BU-3821                                                               | AE-186        | *                                     |
| BU-4104                                                               | AE-187        | *                                     |
| BU-3826                                                               | AE-188        | AE-146 Tank Battery                   |
| BU-3604                                                               | AE-190        | *                                     |
| BU-3520                                                               | AE-191        | AE-193 Tank Battery                   |
| BU-3605                                                               | AE-192        | *                                     |
| BU-3700                                                               | AE-193        | AE-193 Tank Battery                   |
| BU-3871                                                               | AE-194        | AE-154 Tank Battery                   |
| BU-4095                                                               | AE-195        | AE-154 Tank Battery                   |
| BU-3978                                                               | AE-196        | AE-154 Tank Battery                   |
| BU-3979                                                               | AE-197        | AE-155 Tank Battery                   |
| BU-10349                                                              | AE-198        | AE-155 Tank Battery                   |
| BU-4272                                                               | AE-201        | *                                     |
| BU-10554                                                              | AE-205        | AE-207 Tank Battery                   |
| BU-3979                                                               | AE-206        | AE-207 Tank Battery                   |
| BU-10610                                                              | AE-207        | AE-207 Tank Battery                   |
| BU-3979                                                               | AE-206        | AE-207 Tank Battery                   |
| BU-4390                                                               | AE-209        | AE-154 Tank Battery                   |
| BU-4194                                                               | AE-211        | AE-211 Tank Battery                   |
| BU-3905                                                               | AE-212        | AE-214 Tank Battery                   |
| BU-3509                                                               | AE-213        | AE-214 Tank Battery                   |
| BU-3721                                                               | AE-214        | AE-214 Tank Battery                   |
| BU-3550                                                               | AE-215        | *                                     |
| BU-4240                                                               | AE-216        | AE-216 Tank Battery                   |
| BU-3722                                                               | AE-223        | *                                     |
| BU-3720                                                               | AE-224        | *                                     |
| BU-4635                                                               | AE-229        | *                                     |
| BU-4117                                                               | AE-231        | *                                     |
| BU-3825                                                               | AE-232        | EH-44 Tank Battery                    |
| BU-3950                                                               | AE-233        | AE-146 Tank Battery                   |
| BU-4919                                                               | AE-239        | AE-216 Tank Battery                   |
| BU-4517                                                               | AE-249        | AE-211 Tank Battery                   |
| BU-4538                                                               | AE-250        | AE-211 Tank Battery                   |
| BU-4546                                                               | AE-259        | *                                     |

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BU-4391  
BU-4585

AE-260  
AE-261

EH-46 Tank Battery  
EH-46 Tank Battery  
\* = produced water tank located at wellsite

File or Permit #                      Well #                      Tank Battery

DICKENSON CO, VA WELLS (CBM & CONVENTIONAL NAT. GAS)

|         |        |   |
|---------|--------|---|
| 1577-01 | EH-14  | * |
| 1369-01 | EH-18  | * |
| 1409-01 | EH-20  | * |
| 1954-01 | EH-21  | * |
| 1475-01 | EH-23  | * |
| 1410-01 | EH-24  | * |
| 1544-01 | EH-25  | * |
| 1468-01 | EH-26  | * |
| 1590-01 | EH-27  | * |
| 2030-01 | EH-37  | * |
| 1440-01 | EH-40  | * |
| 1605-01 | EH-50  | * |
| 2124-01 | EH-51  | * |
| 1607-01 | EH-52  | * |
| 1767-01 | EH-53  | * |
| 1616-01 | EH-54  | * |
| 2189-01 | EH-55  | * |
| 1634-01 | EH-65  | * |
| 2105-01 | EH-69  | * |
| 1591-01 | EH-84  | * |
| 1592-01 | EH-85  | * |
| 1593-01 | EH-86  | * |
| 1885-01 | EH-108 | * |
| 1893-01 | EH-118 | * |
| 2527-01 | EH-120 | * |
| 2791-01 | EH-128 | * |
| 2790-01 | EH-129 | * |
| 6976    | AE-151 | * |

MCDOWELL CO, WVA WELLS (CONVENTIONAL NAT. GAS)

|      |      |   |
|------|------|---|
| 0996 | EH-3 | * |
| 1016 | EH-4 | * |
| 1008 | EH-5 | * |
| 389  | EH-6 | * |
| 1017 | EH-7 | * |

\* = produced water tank located at wellsite

Prepared by  
*Appalachian Energy, Inc.*  
PO Box 2406, Abingdon, VA 24212  
Ph: 276/619-4880 Fax: 276/619-4770

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west virginia department of environmental protection

Office of Oil and Gas  
601 57<sup>th</sup> Street  
Charleston, WV 25304  
(304) 926-0450  
fax: (304) 926-0452

Joe Manchin III, Governor  
Randy C. Huffman, Cabinet Secretary  
[www.wvdep.org](http://www.wvdep.org)

September 24, 2010

GeoMet Operating Company, Inc.  
Attn: Dallas Nestel  
P.O. Box 749  
Pounding Mill, VA 24637

Re: Underground Injection Control (UIC) Well Permit Modification

UIC permit/well #2D1092032 is hereby approved to accept Class II fluids as defined in 47CSR13-4.2 from **Appalachian Energy, Inc.** The API#s of wells to be serviced by your injection well and the formation the fluids are coming from must be submitted to this agency.

If you have any questions regarding this matter feel free to contact me at 304-926-0499, ext. 1653.

Sincerely,

James Peterson  
Environmental Resources Specialist / Permitting

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# **Section 10**

# **Monitoring**

## **Section 10-Monitoring**

Monitoring of all injection parameters shall be reported and logged daily consisting of startup/shutdown pressures, total injection volumes, injection rates, average injection pressures and annulus pressure along with the integrity of all tanks, containments, equipment and manifolds/lines. WR-40's shall be completed and filed in accordance with state regulations and kept on file at the facility office and be made available upon request. Fluids manifests shall be completed documenting every load of fluid delivered to the facility for disposal. These manifests shall report the following:

- Operator
- Well Name, Number, and API number
- Amount of fluid
- Type of fluid
- Contractor Hauling Fluid
- Name of Driver/Truck number
- Fluid Sampling/Testing, if required

Records of this information shall be kept at the facilities office and shall be made available upon request.

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# **Section 11**

## **Groundwater Protection Plan**

**Appendix H**  
***Ground Water Protection Plan (GPP)***

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# APPENDIX H

## GROUNDWATER PROTECTION PLAN

Facility Name: Gilbert-Plumley A-55

County: Wyoming

Facility Location:

|                         |                    |            |            |
|-------------------------|--------------------|------------|------------|
| Postal Service Address: | 4191 Pad Fork Road |            |            |
| Hanover, WV 24839       |                    |            |            |
| Latitude :              | 37.704905          | Longitude: | -81.421473 |

Contact Information:

|                 |                           |  |  |
|-----------------|---------------------------|--|--|
| Person:         | Rocky Stilwell            |  |  |
| Phone Number:   | 276-455-1773              |  |  |
| E-mail Address: | rstilwell@atlasenergy.com |  |  |

Date: 11/15/2017

1. A list of all operations that may contaminate the groundwater.

|                                                                                                                                              |
|----------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> <li>- Water trucks unloading Class II fluids</li> <li>- Trucks (petroleum, glycols, road salt)</li> </ul> |
|----------------------------------------------------------------------------------------------------------------------------------------------|

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2. A description of procedures and facilities used to protect groundwater quality from the list of potential contaminant sources above.

|                                                                                                                                                                                                                                                                                                                                                                           |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> <li>- Secondary containment and enclosure for all pumps and filtration units</li> <li>- Secondary containment for all tanks.</li> <li>- Use of concrete unloading bays with cameras.</li> <li>- All bag filters located in secondary containment unit.</li> <li>- Proper disposal of all solid waste (filtered/bag filters)</li> </ul> |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

3. List procedures to be used when designing and adding new equipment or operations.

|                                                                                                                                                                                                                                                                               |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> <li>-Provide site security to prevent unauthorized entry.</li> <li>-Use of real time security cameras and alarms.</li> <li>-Design for secondary containment for all pipelines and storage tanks.</li> <li>-Consult with WVDEP.</li> </ul> |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

4. Summarize all activities at your facility that are already regulated for groundwater protection.

-AST Act  
-This permit

5. Discuss any existing groundwater quality data for your facility or an adjacent property.

See Section 7 of this report. Springs sampled annually, no groundwater monitoring wells within a mile of the site.

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6. Provide a statement that no waste material will be used for deicing or fill material on the property unless allowed by another rule.

It is ARP Mountaineer Production, LLC operating policy that any and all wastes generated at this facility will be properly managed through applicable solid waste regulations. ARP Mountaineer Production, LLC currently maintains a 2 year blanket permit with the Raleigh County Solid Waste Authority.

7. Describe the groundwater protection instruction and training to be provided to the employees. Job procedures shall provide direction on how to prevent groundwater contamination.

- ARP Mountaineer Production, LLC provides and conducts monthly environmental meetings for all employees. Contractor training is conducted at annually or more frequently as needed.
- UIC well is inspected daily while in operation. Cameras monitor the facility 24hours.
- All waste generated are placed in containers to prevent surface water or precipitation to affect surficial soils. All solid waste is stored in containers inside the building until disposed at a permitted facility
- Tank battery has overfill and spill alarms that prohibit overfills.
- All contract drivers and employees have understood and agreed to ARP Mountaineer Production, LLC's operational environmental policies.

8. Include provisions for inspections of all GPP elements and equipment. Inspections must be made quarterly at a minimum.

- ARP Mountaineer Production, LLC employees and/or contractors are on-site daily. Any leaks are repaired immediately. Tank battery has overfill and spill alarms that prohibit unauthorized delivery.

- Injection pipeline is inspected daily and injection pressure is monitored in real time.

Signature: Rocky Atwood

Date: 11-29-2017

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## **Section 12**

# **Plugging and Abandonment**

## **Section 12 -Plugging and Abandonment (Amended 4/10/18)**

After completion of injection fluids or in the event the well inspection data concludes that a well integrity issue may occur, the injection well will be plugged and abandoned in accordance with all applicable WVDEP regulations. Prior to abandonment, the small building on-top of the well head will be inspected for asbestos containing materials (ACM) and will be properly demolished per applicable regulations. The plan is to have the well in static condition, remove the 2 3/8" tubing and packer. Run a CBL to determine the top of cement and a production backoff point. Tubing will then be ran back into the hole with either a cement plug or bentonite gel balanced over all perforated intervals in the well spacing from 50 feet below the perforations to 50 feet above the perforations. If a bentonite gel is used to plug the perforated intervals, a cement plug will be used to further displace the bentonite gel. The 7" production casing shall then be backed off at free point and a 100 foot balanced cement plug shall be set at the backoff point and a 100 foot cement plug set to the surface. Upon completion of the well abandonment, the well head will be removed, cemented to surface and permanent abandonment monument will be erected. Finally, a completed WR-38 form will be submitted to the OOG within 30 days of well abandonment.

# **Section 13**

## **Additional Bonding**

## **Section 13 – Additional Bonding**

Proper performance bonding is in place for Gilbert-Plumley A-55 well as previously provided by ARP Mountaineer Production, LLC. The OOG has that current information on file.

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# **Section 14**

## **Financial Responsibility**

**Appendix I**  
***Financial Responsibility***

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### APPENDIX I

#### Requirement for Financial Responsibility to Plug/Abandon an Injection Well

To: WV Department of Environmental Protection  
 Office of Oil and Gas  
 601 57<sup>th</sup> Street, SE  
 Charleston, West Virginia 25304-2345  
 ATTN: Underground Injection Control Program

From: APP Maintainer Production, LLC  
2615 Steelsburg Highway  
Cedar Bluff VA 24609

Date: 4-19-18

Subject: Underground Injection Control (UIC) Permit Application  
# UIC 2010902032  
 Requirement for Financial Responsibility

I, Christopher Walker, verify in accordance with 47CSR13-13.7.g., that I will maintain financial responsibility and resources to close, plug, and abandon underground injection wells(s) in a manner prescribed by the Chief of the Office of Oil and Gas.

Name: Christopher Walker

Signature: *[Handwritten Signature]*

Date: 4-19-18



# **Section 15**

## **Site Security Plan**

**Appendix J**  
***Site Security for Commercial Wells***

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## APPENDIX J

### Site Security for Commercial Facilities

Provide a detailed description of the method(s) utilized at the facility to restrict or prohibit illegal dumping of unauthorized waste or vandalism at the facility.

1. Complete enclosure of all wells, holding tank/pits and manifold assemblies within a chain link or other suitable fencing; and
2. Require that all gates and other entry points be locked when the facility is unattended; or
3. Providing tamper-proof seals for the master valve on each well (a "lock-out" or chain & padlock system would be more secure; however, these devices could create a potential safety hazard if the well needed to be quickly shut in due to an emergency); and
4. Installing locking caps on all valves and connections on holding tanks, unloading racks, and headers.

All valves are locked. Security cameras monitor the truck unloading bays, tank battery, pumpss, and unloading controls. Fluid levels in the tanks are monitored continuously by ARP Mountaineer Production, LLC personnel through telemetry. All valves are locked and only authorized representatives have access to the tank battery.

The injection well pump building is locked at all times. Upon departure from deliveries, valves are locked by the driver.

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# **Section 16**

## **Additional Information**

# SPCC Plan

## TIER I QUALIFIED FACILITY SPILL PREVENTION, CONTROL AND COUNTERMEASURE PLAN

*Prepared for:*



**ARP MOUNTAINEER PRODUCTION, LLC  
LASHER INJECTION STATION SITE  
PAD FORK, HANOVER WEST VIRGINIA 24839**

*Prepared By:*

**Zephyr Environmental Corporation  
10440 Little Patuxent Parkway, Suite 750  
Columbia, Maryland 21044**

*November 2014*



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| Appendix D | Secondary Containment Calculations |
| Appendix E | Safety Data Sheets                 |
| Appendix F | Substantial Harm Certification     |

### WV CODE §22-30-9 CROSS-REFERENCE TO PLAN SECTIONS

| §22-30-9 Requirement                                                                                                     | Plan Section                                                                                                       |
|--------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------|
| Identity and description of activities and processes at the site                                                         | Section 2                                                                                                          |
| List of all types of fluids stored in ASTs                                                                               | Table 1                                                                                                            |
| Amounts of fluids stored in each AST                                                                                     | Table 1 lists maximum (shell) capacities; average storage volumes are assumed to be 50% of shell capacity.         |
| Name and amounts of wastes stored in ASTs                                                                                | Table 1                                                                                                            |
| MSDSs for fluids stored in ASTs                                                                                          | Appendix E                                                                                                         |
| Drawings of the facility                                                                                                 | Figures 1, 2 and 3. There are no drainage pipes (sheet runoff only) or monitoring wells at the facility.           |
| AST leak detection monitoring                                                                                            | Section 3.9                                                                                                        |
| AST inspection procedures                                                                                                | Section 3.9                                                                                                        |
| AST stress points                                                                                                        | For all tanks subject to §22-30-9, AST stress points are located at nozzles where piping is connected to the tank. |
| Employee training program                                                                                                | Section 3.10                                                                                                       |
| Security systems                                                                                                         | Section 3.11                                                                                                       |
| Spill prevention measures                                                                                                | Table 2                                                                                                            |
| Names, titles, duties and responsibilities for developing, implementing and maintaining the facility spill response plan | Section 2 of Appendix A                                                                                            |
| Chain of command                                                                                                         | Section 2 of Appendix A                                                                                            |
| Contact information for facility emergency responders                                                                    | Section 3 of Appendix A                                                                                            |

**TIER I QUALIFIED FACILITY SPILL PREVENTION, CONTROL AND COUNTERMEASURE PLAN**  
**ARP MOUNTAINEER PRODUCTION LLC, LASHER INJECTION STATION SITE**

---

| <b>§22-30-9 Requirement</b>                                                | <b>Plan Section</b>     |
|----------------------------------------------------------------------------|-------------------------|
| Contact information for emergency response contractors                     | Section 3 of Appendix A |
| Spill response procedures                                                  | Section 4 of Appendix A |
| Contact information for county and municipal emergency management agencies | Section 3 of Appendix A |
| Contact information for nearest downstream public water supply             | Section 3 of Appendix A |
| Contact information for WVDEP                                              | Section 3 of Appendix A |

## SELF-CERTIFICATION STATEMENT

TIER I QUALIFIED FACILITY SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN  
ARP MOUNTAINEER PRODUCTION LLC  
LASHER INJECTION STATION SITE

I certify that each of the following is true and accurate:

- (i) I am familiar with the applicable requirements of 40 CFR Part 112;
- (ii) I have visited and examined the Facility;
- (iii) This Plan was prepared in accordance with accepted and sound industry practices and standards;
- (iv) Procedures for required inspections and testing have been established in accordance with industry inspection and testing standards or recommended practices;
- (v) This Plan will be fully implemented;
- (vi) This Facility meets the following qualification criteria in §112.3(g)(1):
  - a. The aggregate aboveground oil storage capacity of the Facility is 10,000 U.S. gallons or less;
  - b. The Facility has had no single discharge as described in §112.1(b) exceeding 1,000 U.S. gallons and no two discharges as described in §112.1(b) each exceeding 42 U.S. gallons within any twelve month period in the three years prior to the SPCC Plan self-certification date, or since becoming subject to 40 CFR Part 112 if the Facility has been in operation for less than three years (not including oil discharges as described in §112.1(b) that are the result of natural disasters, acts of war, or terrorism); and
  - c. There is no individual oil storage container at the Facility with an aboveground capacity greater than 5,000 U.S. gallons.
- (vii) This Plan does not deviate from any requirement of 40 CFR Part 112 as allowed by §112.7(a)(2) (environmental equivalence) and §112.7(d) (impracticability of secondary containment) or include measures pursuant to §112.9(c)(6) for produced water containers and any associated piping; and
- (viii) This Plan and individual(s) responsible for implementing this Plan have the full approval of management and I have committed the necessary resources to fully implement this Plan.
- (ix) The requirement to prepare and implement a Plan under §112.3 and all of the requirements under §112.6(a) have been satisfied.

Jeff Cooper  
Signature

Jeff Cooper  
Name

Production Foreman  
Title

1-5-2018  
Date

## MANAGEMENT APPROVAL

TIER I QUALIFIED FACILITY SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN  
ARP MOUNTAINEER PRODUCTION LLC  
LASHER INJECTION STATION SITE

I certify that this SPCC Plan has the full approval of company management at a level of authority to commit the necessary resources to fully implement this Plan. Furthermore, ARP Mountaineer, LLC is committed to the provision of manpower, equipment and materials required to expeditiously control and remove any quantity of oil discharged from the Facility.

Authorized Facility Representative: Jeff Cooper

Signature: *Jeff Cooper*

Title: Production Foreman

Date: 1-5-2018

Designated Person Accountable for SPCC Plan: Rene St. Pierre  
(If different from above)

Signature: *Rene St. Pierre*

Title: V.P. of Operations

Date: 2/13/18

## PLAN REVIEW AND AMENDMENT LOG

A summary of scheduled five-year reviews and Plan amendments are recorded on the table below. This log must be completed even if no amendment is made to the Plan. Unless a technical or administrative change prompts an earlier review, the next scheduled review of this Plan must occur within 5 years of the date of the last review.

| Revision Made                    | Page/Section Number             | Date       | Authorized Individual | P.E. Certification Necessary?                                         |
|----------------------------------|---------------------------------|------------|-----------------------|-----------------------------------------------------------------------|
| Initial issue                    | All                             | 11/18/2014 | Jessica Nelko         | Yes <input checked="" type="checkbox"/> / No <input type="checkbox"/> |
| Annual Review                    | Page 6                          | 11/04/2015 | Jessica Nelko         | Yes <input type="checkbox"/> / No <input checked="" type="checkbox"/> |
| Annual Review: Personnel Updates | SPCC Plans and Contingency Plan | 12/18/2017 | Brian Shpakoff        | Yes <input type="checkbox"/> / No <input checked="" type="checkbox"/> |
|                                  |                                 |            |                       | Yes <input type="checkbox"/> / No <input type="checkbox"/>            |
|                                  |                                 |            |                       | Yes <input type="checkbox"/> / No <input type="checkbox"/>            |
|                                  |                                 |            |                       | Yes <input type="checkbox"/> / No <input type="checkbox"/>            |
|                                  |                                 |            |                       | Yes <input type="checkbox"/> / No <input type="checkbox"/>            |
|                                  |                                 |            |                       | Yes <input type="checkbox"/> / No <input type="checkbox"/>            |
|                                  |                                 |            |                       | Yes <input type="checkbox"/> / No <input type="checkbox"/>            |
|                                  |                                 |            |                       | Yes <input type="checkbox"/> / No <input type="checkbox"/>            |
|                                  |                                 |            |                       | Yes <input type="checkbox"/> / No <input type="checkbox"/>            |
|                                  |                                 |            |                       | Yes <input type="checkbox"/> / No <input type="checkbox"/>            |
|                                  |                                 |            |                       | Yes <input type="checkbox"/> / No <input type="checkbox"/>            |

*Note: If technical amendments are required for the SPCC Plan, attach Professional Engineer Certification to this document.*

## 1.0 INTRODUCTION

### 1.1 RULE APPLICABILITY

Except as provided in 40 CFR §112.1(d), a "facility" as defined in §112.2 must prepare a Spill Prevention, Control and Countermeasure (SPCC) Plan in accordance with 40 CFR 112 if the facility could reasonably be expected to discharge oil in quantities that may be harmful, as described in 40 CFR 110, into or upon navigable waters of the United States. The purpose of a SPCC Plan is to establish engineering and management procedures, methods, equipment, and other requirements to prevent the discharge of oil. In addition, a SPCC Plan must also address countermeasures for oil discharge discovery, response and cleanup.

The facility covered by this SPCC Plan ("the Facility") does not have aggregate aboveground oil storage capacity in excess of the SPCC rule threshold (1,320 gallons). However, the Facility could potentially discharge oil in quantities that could be harmful, as described in 40 CFR 110, into or upon navigable waters of the United States. Although aggregate aboveground oil storage capacity is less than the SPCC rule threshold, the Facility has prepared a written Tier I Qualified Facility SPCC Plan to address the potential for a discharge from the Facility. The Facility would be subject to requirements for onshore facilities under §112.8, rather than §112.9, because the Facility does not produce oil and is not a "Production Facility" as defined in §112.2.

A facility that is required to prepare a SPCC Plan may also be required to prepare a Facility Response Plan (FRP) under 40 CFR § 112.20. The Substantial Harm criteria checklist in Appendix C of the SPCC rule must be completed to determine whether a Facility must prepare a FRP. As recorded in the Certification of the Applicability of the Substantial Harm Criteria Checklist (Appendix E), the Facility is not required to prepare a FRP.

This SPCC Plan has been prepared in conformance with EPA's SPCC Plan requirements as described in 40 CFR 112, as amended through November 22, 2011. This SPCC Plan also incorporates the following federal and state requirements regarding spill prevention and response:

- 40 CFR 110 – Discharge of Oil
- 35 CSR 1 – Water pollution rules for oil and gas production sites
- 35 CSR 3 – Rules for coal bed methane wells
- WV Code, Chapter 22, Article 30 – Aboveground Storage Tank Act and associated legislative rules (pending promulgation)

The sections of this Plan are presented in the sequence of the SPCC rule. In the sections, applicable rule requirements are provided in italics, followed by an explanation of how the requirements have been addressed at the Facility.

## 1.2 SPCC RULE EFFECTIVE DATE

*§112.3(a)(1) – Except as otherwise provided in this section, if your facility, or mobile or portable facility, was in operation on or before August 16, 2002, you must maintain your Plan, but must amend it, if necessary to ensure compliance with this part, and implement the amended Plan no later than November 10, 2011. If such a facility becomes operational after August 16, 2002, through November 10, 2011, and could reasonably be expected to have a discharge as described in § 112.1(b), you must prepare and implement a Plan on or before November 10, 2011.*

The Facility became operational prior to 2011, therefore the Facility is required to prepare and implement a SPCC Plan on or before November 10, 2011.

## 1.3 SPCC PLAN AVAILABILITY

*§112.3(e) – If you are the owner or operator of for which a Plan is required under this section, you must:*  
*(1) – Maintain a complete copy of the Plan at the facility if the facility is normally attended at least four hours per day, or at nearest field office if the facility is not so attended, and*  
*(2) – Have the Plan available to the Regional Administrator for on-site review during normal working hours.*

The Facility is normally attended for less than four hours per day. A complete copy of this SPCC Plan will be maintained at the nearest field office. During normal working hours, the Plan will be available to authorized representatives of State and Federal governing agencies for on-site review.

## 1.4 SPCC PLAN AMENDMENT BY OWNER/OPERATOR:

*§112.5(a) – Amend the SPCC Plan for your facility in accordance with the general requirements in §112.7, and with any specific section of this part applicable to your facility, when there is a change in the facility design, construction, operation, or maintenance that materially affects its potential for a discharge as described in §112.1(b). An amendment made under this section must be prepared within six months, and implemented as soon as possible, but not later than six months following preparation of the amendment.*

If there is a change in Facility design, construction, operation, or maintenance that materially affects the potential for a discharge, this SPCC Plan will be amended within six months of the change and the amended Plan will be implemented within six-months of the amendment. Changes that could materially affect the potential for a discharge include addition of oil containers and reduction of secondary containment capacity. All Plan amendments will be recorded on the Record of Plan Review and Amendment Log. (Note: WV Code §22-30-9 includes additional criteria for Plan amendment, as described in Section 1.5 below).

**TIER I QUALIFIED FACILITY SPILL PREVENTION, CONTROL AND COUNTERMEASURE PLAN**  
**ARP MOUNTAINEER PRODUCTION LLC, LASHER INJECTION STATION SITE**

---

*§112.5(b) – Notwithstanding compliance with paragraph (a) of this section, complete a review and evaluation of the SPCC Plan at least once every five years from the date your facility becomes subject to this part; or, if your facility was in operation on or before August 16, 2002, five years from the date your last review was required under this part. As a result of this review and evaluation, you must amend your SPCC Plan within six months of the review to include more effective prevention and control technology if the technology has been field-proven at the time of the review and will significantly reduce the likelihood of a discharge as described in §112.1(b) from the facility. You must implement any amendment as soon as possible, but not later than six months following preparation of any amendment. You must document your completion of the review and evaluation, and must sign a statement as to whether you will amend the Plan, either at the beginning or end of the Plan or in a log or an appendix to the Plan.*

This Plan will be reviewed at least once every five years from the date the Facility became subject to the SPCC rule (November 10, 2011), or the date of the last five year review for all subsequent reviews. As a result of the review, the Plan will be amended within six months of the review if more effective prevention and control technology has been field-proven at the time of the review and will significantly reduce the likelihood of a discharge. The amended Plan will be implemented within six-months following such an amendment. Each Plan review and amendment will be recorded in the Record of Plan Review and Amendment Log. (Note: WV Code §22-30-9 requires more frequent review of the Plan, as described in Section 1.5 below).

*§112.5(c) – Except as provided in §112.6, have a Professional Engineer certify any technical amendments to your Plan in accordance with §112.3(d)*

Technical amendments made to the Plan will be certified by a Professional Engineer. Technical amendments include any change involving oil containers, secondary containment or inspection procedures. Name and phone number changes do not require a technical amendment.

## **1.5 WV SPILL PREVENTION RESPONSE PLAN REQUIREMENTS**

This Plan has been developed to satisfy WV Code §22-30-9, which requires submission of a site-specific Spill Prevention Response Plan for each aboveground storage tank with capacity greater than 1,320 gallons. The minimum required content for a Spill Prevention Response Plan is summarized in the "WV Code §22-30-9 Cross-Reference to Plan Sections" page. Spill Prevention Response Plan submission requirements are as follows:

- The Plan must be submitted to the WVDEP for approval by December 3, 2014.
- As required by the WVDEP, the approved Plan must be submitted to applicable public water systems and county and municipal emergency management agencies.
- The Plan must be resubmitted every 3 years.
- The Plan must be revised and resubmitted if any of the following occur:
  - There is a substantial modification to an AST, or there are circumstances that increase the potential for fires, explosions or releases of fluids.

**TIER I QUALIFIED FACILITY SPILL PREVENTION, CONTROL AND COUNTERMEASURE PLAN**  
**ARP MOUNTAINEER PRODUCTION LLC, LASHER INJECTION STATION SITE**

---

- There is a substantial modification in emergency equipment.
- There are substantial changes in emergency response protocols.
- The Plan fails in an emergency.
- Removal or addition of an AST.
- A request from the WYDEP.

## 2.0 FACILITY INFORMATION

|                                          |                                                                                                                                                                           |
|------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Facility Name:</b>                    | Lasher Injection Station Site                                                                                                                                             |
| <b>Facility Address:</b>                 | Pad Fork, Hanover WV 24839                                                                                                                                                |
| <b>Facility Location:</b>                | N 37° 30' 32", W 81° 42' 10"                                                                                                                                              |
| <b>Facility County:</b>                  | Wyoming                                                                                                                                                                   |
| <b>Owner/Operator Name:</b>              | Atlas Resource Partners (ARP) Mountaineer Production, LLC.                                                                                                                |
| <b>Owner/Operator Address:</b>           | 425 Houston St, Ft Worth, TX 76102 Ste 300                                                                                                                                |
| <b>Process Description:</b>              | The Facility accumulates produced water from coal bed methane wells nearby. No gas processing or compression occurs at the site. The produced water does not contain oil. |
| <b>Initial Operation:</b>                | 2003                                                                                                                                                                      |
| <b>Bulk Storage Containers</b>           | <ul style="list-style-type: none"> <li>• Produced water tanks (7)</li> </ul>                                                                                              |
| <b>Flow-Through Process Vessels:</b>     | <ul style="list-style-type: none"> <li>• None</li> </ul>                                                                                                                  |
| <b>Oil-Filled Operational Equipment:</b> | <ul style="list-style-type: none"> <li>• None</li> </ul>                                                                                                                  |
| <b>Oil-Containing Piping:</b>            | <ul style="list-style-type: none"> <li>• None</li> </ul>                                                                                                                  |
| <b>Oil Loading Racks:</b>                | There is no "loading rack" as defined in the SPCC rule at the Facility.                                                                                                   |
| <b>Facility Drainage:</b>                | Runoff from the Facility flows → Pad Fork → Little Huff Creek → Guyandotte River                                                                                          |

### 3.0 GENERAL REQUIREMENTS

#### 3.1 FACILITY LAYOUT

*§112.7(a)(3) – Describe in your Plan the physical layout of the facility and include a facility diagram, which must mark the location and contents of each fixed oil storage container and the storage area where mobile or portable containers are located. The facility diagram must identify the location of and mark as "exempt" underground tanks that are otherwise exempted from the requirements of this part under §112.1(d)(4). The facility diagram must also include all transfer stations and connecting pipes.*

The location of the Facility is shown in Figure 1. The physical layout of the Facility is shown in Figure 2. The location of each container, vacuum truck loading area and oil-containing connecting pipes are shown in Figure 2. The contents of each container are listed in Table 1.

#### 3.2 OIL STORAGE CAPACITY

*§112.7(a)(3)(i) – Address the type of oil in each fixed container and its storage capacity. For mobile or portable containers, either provide the type of oil and storage capacity for each container or provide an estimate of the potential number of mobile or portable containers, the types of oil, and anticipated storage capacities.*

The type of fluid in each fixed container and the container storage capacity are listed in Table 1.

#### 3.3 COUNTERMEASURES FOR DISCHARGE DISCOVERY, RESPONSE, AND CLEANUP

*§112.7(a)(3)(iv) - Address countermeasures for discharge discovery, response, and cleanup (both the facility's capability and those that might be required of a contractor):*

The Facility is capable of discharge discovery, response, and cleanup. Specific countermeasures are discussed in individual sections of this Plan.

- The Facility is monitored on a daily basis by Facility personnel. Any potential discharge from the Facility should be discovered during these observations.
- A Spill Contingency Plan is maintained (Appendix A). Off-site response and cleanup of a discharge will be performed by qualified spill cleanup contractors as described in the Spill Contingency Plan.

### 3.4 CONTACT LIST AND NOTIFICATION PHONE NUMBERS

*§112.7(a)(3)(vi) – Provide contact list and phone numbers for the facility response coordinator, National Response Center, cleanup contractors with whom you have an agreement for response, and all appropriate Federal, State, and local agencies who must be contacted in case of a discharge as described in §112.1(b).*

A contact list and phone numbers for Facility responders, government agencies and cleanup contractors is included in the Spill Contingency Plan (Appendix A).

### 3.5 REPORTING AND NOTIFICATION PROCEDURES

*§112.7(a)(4) - Unless you have submitted a response plan under §112.20, provide information and procedures in your Plan to enable a person reporting a discharge as described in §112.1(b) to relate information on the exact address or location and phone number of the facility; the date and time of the discharge; the type of material discharged; estimates of the total quantity discharged; estimates of the quantity discharged as described in §112.1(b); the source of the discharge; a description of all affected media; the cause of the discharge; any damages or injuries caused by the discharge; actions being used to stop, remove, and mitigate the effects of the discharge; whether an evacuation may be needed, and, the names of individuals and/or organizations who have also been contacted.*

The Spill Contingency Plan (Appendix A) includes a reporting form that contains information and procedures needed by Facility personnel to report a discharge to government agencies.

### 3.6 OIL SPILL RESPONSE PROCEDURES

*§112.7(a)(5) - Unless you have submitted a response plan under §112.20, organize portions of the Plan describing procedures you will use when a discharge occurs in a way that will make them readily usable in an emergency, and include appropriate supporting material as appendices.*

The Spill Contingency Plan (Appendix A) contains discharge response procedures that will be used if a discharge occurs.

### 3.7 DISCHARGE ANALYSIS

*§112.6(a)(3)(i) in lieu of §112.7(b) - Where experience indicates a reasonable potential for equipment failure (such as loading or unloading equipment, tank overflow, rupture, or leakage, or any other equipment known to be a source of a discharge), include in your Plan a prediction of the direction and total quantity of oil which could be discharged from the facility as a result of each type of major equipment failure.*

Predictions of the direction and total quantity of material that could be discharged are summarized in the Spill Contingency Plan (Appendix A). Natural drainage patterns from the Facility are depicted in Figures 2 and 3.

### 3.8 SPILL CONTAINMENT

*§112.7(c) - Provide appropriate containment and/or diversionary structures or equipment to prevent a discharge as described in §112.1(b) except as provided in paragraph (k) of this section for qualified oil-filled operational equipment, and except as provided in §112.9(d)(3) for flowlines and intra-facility gathering lines at an oil production facility. The entire containment system, including walls and floor, must be capable of containing oil and must be constructed so that any discharge from a primary containment system, such as a tank or pipe, will not escape the containment system before cleanup occurs. In determining the method, design, and capacity for secondary containment, you need only to address the typical failure mode, and the most likely quantity of oil that would be discharged. Secondary containment may be either active or passive in design. At a minimum, you must use one of the following prevention systems or its equivalent:*

*(1) For onshore facilities:*

- (i) Dikes, berms, or retaining walls sufficiently impervious to contain oil;*
- (ii) Curbing or drip pans;*
- (iii) Culverting, gutters, or other drainage systems;*
- (iv) Weirs, booms, or other barriers;*
- (v) Spill diversion ponds;*
- (vi) Retention ponds; or*
- (vii) Sorbent materials.*

Appropriate containment to prevent a discharge is provided as described in Table 2.

### 3.9 INSPECTIONS, TESTS, AND RECORDS

*§112.7(e) - Conduct inspections and tests required by this part in accordance with written procedures that you or the certifying engineer develop for the facility. You must keep these written procedures and a record of the inspections and tests, signed by the appropriate supervisor or inspector, with the SPCC Plan for a period of three years. Records of inspections and tests kept under usual and customary business practices will suffice for purposes of this paragraph.*

The following monitoring and inspections are performed at the Facility:

- The Facility is monitored on a daily basis by an operator for visible signs of leakage, spills and conditions that could cause a leak or spill.
- Storage tanks are visually inspected quarterly by an operator using an inspection checklist (Appendix B).
- Storage tanks with capacity greater than 1,320 gallons are inspected annually in accordance with West Virginia aboveground storage tank inspection requirements. The inspections are performed by qualified personnel and certified by a registered professional engineer.

If a deficiency is noted during an inspection or test that could result in a discharge of oil or other pollutant, corrective action must be taken to address the deficiency. Records of inspections shall be maintained for at least three years. Records of annual tank inspections shall be maintained for the life of the tank.

### 3.10 PERSONNEL TRAINING AND DISCHARGE PREVENTION PROCEDURES

*§112.7(f)(1) - At a minimum, train your oil-handling personnel in the operation and maintenance of equipment to prevent discharges; discharge procedure protocols; applicable pollution control laws, rules, and regulations; general facility operations; and, the contents of the facility SPCC Plan.*

Personnel at the Facility are trained in the operation and maintenance of Facility equipment to prevent discharges. Training covers discharge procedure protocols, applicable pollution control laws and regulations, general Facility operations, and the contents of the SPCC Plan. Training is conducted initially and whenever the Facility is modified, personnel responsibilities are changed, or the SPCC Plan is amended. Training records are maintained for at least three years.

*§112.7(f)(2) - Designate a person at each applicable facility who is accountable for discharge prevention and who reports to facility management.*

The Production Supervisor is accountable for discharge prevention at the Facility. The Production Supervisor will direct the Production Foreman with regards to discharge prevention. The Environmental Manager will establish the program and provide guidance as needed.

*§112.7(f)(3) - Schedule and conduct discharge prevention briefings for your oil-handling personnel at least once a year to assure adequate understanding of the SPCC Plan for that facility. Such briefings must highlight and describe known discharges as described in §112.1(b) or failures, malfunctioning components, and any recently developed precautionary measures.*

Personnel at the Facility are briefed in discharges, failures and recently developed precautionary measures during annual spill prevention training. Records of these briefings are maintained for a period of no less than three years.

### 3.11 SECURITY

*§112.7(g) - Describe in your Plan how you secure and control access to the oil handling, processing and storage areas; secure master flow and drain valve; prevent unauthorized access to starter controls on oil pumps; secure out-of-service and loading/unloading connections of oil pipelines; and address the appropriateness of security lighting to both prevent acts of vandalism and assist in the discovery of oil discharges*

The Facility is located in a remote area. The remoteness of the Facility is considered to be sufficient to secure access to the Facility without the need for fencing, gates, locks etc.

Security lighting is not provided because security lighting would not be a deterrent to vandalism. Portable lighting used by Facility operators and fixed lighting within the Facility are adequate to assist in the discovery of a discharge.

### 3.12 ADDITIONAL STATE REQUIREMENTS

*§112.7(j) – In addition to the minimal prevention standards listed under this section, include in your Plan a complete discussion of conformance with the applicable requirements and other effective discharge prevention and containment procedures listed in this part or any applicable more stringent State rules, regulations, and guidelines.*

The State of West Virginia has codified several discharge prevention and containment requirements that are equivalent to or more stringent than 40 CFR Part 112. These requirements are summarized as follows:

- 35 CSR 1.3 establishes discharge notification and response rules. In the event of a reportable discharge, the Office of Oil and Gas (1-800-642-3074) must be notified immediately, but in no case later than 24 hours after becoming aware of the discharge. A reportable discharge is any discharge which would be reportable to the National Response Center pursuant to the Federal Clean Water Act, or any upset or bypass causing exceedance of an effluent limitation established under the general permit for the Facility.
- 35 CSR 1.7 establishes spill prevention rules for production facilities. These rules are equivalent to requirements in 40 CFR Part 112.
- 35 CSR 3 establishes rules for coal bed methane wells. These rules require permitting of coal bed methane wells, and include requirements for production and gathering pipelines.
- WV Code, §22-30 establishes requirements for aboveground storage tanks (ASTs) with capacity greater than 1,320 gallons.
  - §22-30-4 requires registration of each AST in a WVDEP inventory.
  - §22-30-5 requires promulgation of legislative rules for ASTs (pending action by the WVDEP and WV legislature).
  - §22-30-6 requires annual inspection and certification of each AST.
  - §22-30-7 requires promulgation of rules for AST financial responsibility (pending action by the WVDEP).
  - §22-30-9 requires submission to the WVDEP of a spill prevention response plan for each AST.

- §22-30-10 requires notification of any local government and water company if an AST is located within a zone of critical protection, as determined by the WVDEP. The notice must include information regarding the type and quantity of fluid in the AST, and the spill prevention response plan for the AST.
- §22-30-11 requires signage to be displayed on each AST, containing information as specified by the WVDEP.

### 3.13 QUALIFIED OIL-FILLED OPERATIONAL EQUIPMENT

*§112.7(k) – Qualified Oil-filled Operational Equipment. The owner or operator of a facility with oil-filled operational equipment that meets the qualification criteria in paragraph (k)(1) of this sub-section may choose to implement for this qualified oil-filled operational equipment the alternate requirements as described in paragraph (k)(2) of this sub-section in lieu of general secondary containment required in paragraph (c) of this section*

There is no oil-filled operational equipment at the Facility.

## 4.0 REQUIREMENTS FOR ONSHORE FACILITIES

### 4.1 FACILITY DRAINAGE

*§112.8(b)(1) - Restrain drainage from diked storage areas by valves to prevent a discharge into the drainage system or facility effluent treatment system, except where facility systems are designed to control such discharge. You may empty diked areas by pumps or ejectors; however, you must manually activate these pumps or ejectors and must inspect the condition of the accumulation before starting, to ensure no oil will be discharged.*

Drainage from diked storage areas that are capable of being drained is restrained by either a manually operated valve or plug in the drain line.

*§112.8(b)(2) - Use valves of manual, open-and-closed design, for the drainage of diked areas. You may not use flapper-type drain valves to drain diked areas. If your facility drainage drains directly into a watercourse and not into an on-site wastewater treatment plant, you must inspect and may drain uncontaminated retained storm water, as provided in paragraphs (c)(3)(ii), (iii), and (iv) of this section.*

Valves and plugs used for drainage from diked areas that are capable of being drained are of manual, open-and-closed design. Rainwater that accumulates in these areas is inspected for contamination before being drained in accordance with procedures in Appendix C.

### 4.2 BULK STORAGE CONTAINERS

*§112.8(c)(1) - Not use a container for the storage of oil unless its material and construction are compatible with the material stored and the conditions of storage.*

Storage containers at the Facility are constructed of carbon steel or plastic material. Carbon steel and plastic are compatible with all materials stored and the conditions of storage. The flash point of all materials stored is greater than 200 °F.

*§112.6(a)(3)(ii) in lieu of §112.8(c)(2) - Construct all bulk storage container installations (except mobile refuelers and other non-transportation-related tank trucks) so that you provide a secondary means of containment for the entire capacity of the largest single container plus sufficient freeboard to contain precipitation. Dikes, containment curbs, and pits are commonly employed for this purpose. You may also use an alternative system consisting of a drainage trench enclosure that must be arranged so that any discharge will terminate and be safely confined in a facility catchment basin or holding pond.*

Bulk storage containers are provided with sized secondary containment as described in Table 2. Secondary containment calculations are included in Appendix D.

TIER I QUALIFIED FACILITY SPILL PREVENTION, CONTROL AND COUNTERMEASURE PLAN  
ARP MOUNTAINEER PRODUCTION LLC, LASHER INJECTION STATION SITE

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*§112.8(c)(3) - Not allow drainage of uncontaminated rainwater from the diked area into a storm drain or discharge of an effluent into an open watercourse, lake, or pond, bypassing the facility treatment system unless you:*

- (i) Normally keep the bypass valve sealed closed.*
- (ii) Inspect the retained rainwater to ensure that its presence will not cause a discharge as described in §112.1(b).*
- (iii) Open the bypass valve and reseal it following drainage under responsible supervision, and*
- (iv) Keep adequate records of such events, for example, any records required under permits issued in accordance with §§122.41(j)(2) and 122.41(m)(3) of this chapter.*

Rainwater that accumulates in diked storage areas is inspected for contamination before being drained in accordance with procedures in Appendix C.

*§112.8(c)(4) - Protect any completely buried metallic storage tank installed on or after January 10, 1974 from corrosion by coatings or cathodic protection compatible with local soil conditions. You must regularly leak test such completely buried metallic storage tanks.*

There is no buried metallic oil storage tank that is owned or operated by ARP at the Facility.

*§112.8(c)(5) - Not use partially buried or bunkered metallic tanks for the storage of oil, unless you protect the buried section of the tank from corrosion. You must protect partially buried and bunkered tanks from corrosion by coatings or cathodic protection compatible with local soil conditions.*

There is no partially buried or bunkered metallic oil storage tank that is owned or operated by ARP at the Facility.

*§112.8(c)(6) - Test or inspect each aboveground container for integrity on a regular schedule, and whenever you make material repairs. You must determine, in accordance with industry standards, the appropriate qualifications for personnel performing tests and inspections. The frequency of and type of testing must take into account container size and design (such as containers that are shop-built, field-erected, skid-mounted, elevated, equipped with a liner, double-walled, or partially buried). Examples of these integrity tests include, but are not limited to: visual inspection with another testing technique such as hydrostatic testing, radiographic testing, ultrasonic testing, acoustic emissions testing, or another system of non-destructive shell testing. You must keep comparison records and you must also inspect the container's supports and foundations. In addition, you must frequently inspect the outside of the container for signs of deterioration, discharges, or accumulation of oil inside diked areas. Records of inspections and tests kept under usual and customary business practices will suffice for purposes of this paragraph.*

Containers are inspected quarterly by facility personnel. Inspection procedures are contained in Appendix B. In addition, storage tanks with capacity greater than 1,320 gallons are inspected annually by a qualified tank inspector and inspections are certified by a registered professional engineer. If a deficiency is noted during an inspection or test that could result in a discharge, corrective action must be taken to address the deficiency. Records of inspections and corrective actions are maintained for at least three years.

TIER I QUALIFIED FACILITY SPILL PREVENTION, CONTROL AND COUNTERMEASURE PLAN  
ARP MOUNTAINEER PRODUCTION LLC, LASHER INJECTION STATION SITE

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*§112.6(a)(3)(iii) in lieu of §112.8(c)(8) – Ensure that each container is provided with a system or documented procedure to prevent overfills of the container, and describe the system or procedure in the SPCC Plan and regularly test to ensure proper operation or efficacy*

Storage tanks at the Facility are engineered consistent with §112.9(c)(4)(i) to achieve equivalent environmental protection. Tank capacity is adequate to assure that it will not overflow if a gauger is delayed in making regularly scheduled rounds. This method is considered to be good engineering practice to prevent overfills for this type of facility.

*§112.9(c)(10) - Promptly correct visible discharges which result in a loss of oil from the container, including but not limited to seams, gaskets, piping, pumps, valves, rivets, and bolts. You must promptly remove any accumulations of oil in diked areas*

Visible leaks from containers and associated piping are reported upon observation and repaired in a timely manner. Any accumulations of fluid outside of the container will be promptly removed.

*§112.6(a)(3)(ii) in lieu of §112.8(c)(11) - Position or locate mobile or portable oil storage containers to prevent a discharge as described in §112.1(b).*

There are no mobile or portable oil storage containers at the Facility.

#### 4.3 FACILITY TRANSFER OPERATIONS

*§112.8(d)(4) - Regularly inspect all aboveground valves, piping, and appurtenances. During the inspection you must assess the general condition of items, such as flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces. You must also conduct integrity and leak testing of buried piping at the time of installation, modification, construction, relocation, or replacement.*

Aboveground valves, piping and appurtenances are inspected during bulk container inspections as described in Section 4.2.

## TABLES

- Table 1 Oil Storage Containers and Capacities
- Table 2 Secondary Containment Summary

**Table 1**  
**Container Inventory**  
**Lasher Injection Station**

| Registration                   | ID | Container           | Type              | Contents       | Shell Capacity |
|--------------------------------|----|---------------------|-------------------|----------------|----------------|
| 055-00000979                   | 1  | Produced water tank | Bulk storage tank | Water - no oil | 8,813 gal      |
| 055-00000985                   | 2  | Produced water tank | Bulk storage tank | Water - no oil | 8,813 gal      |
| 055-00000981                   | 3  | Produced water tank | Bulk storage tank | Water - no oil | 8,813 gal      |
| 055-00000984                   | 4  | Produced water tank | Bulk storage tank | Water - no oil | 8,813 gal      |
| 055-00000980                   | 5  | Produced water tank | Bulk storage tank | Water - no oil | 8,813 gal      |
| 055-00000982                   | 6  | Produced water tank | Bulk storage tank | Water - no oil | 8,813 gal      |
| 055-00000983                   | 7  | Produced water tank | Bulk storage tank | Water - no oil | 8,813 gal      |
| Total aboveground oil capacity |    |                     |                   |                | 0 gal          |

**Table 2  
Secondary Containment Summary  
Lasher Injection Station**

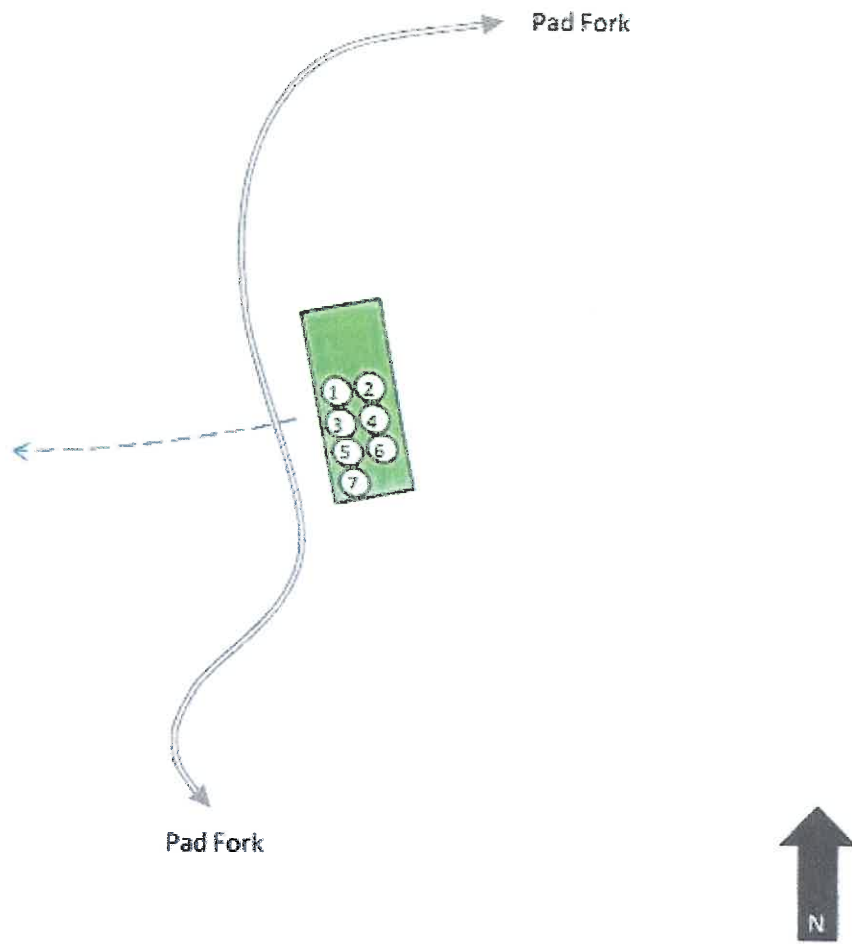
| ID | Discharge source    | Secondary Containment Standard (40 CFR 112) | Design Failure Mode | Design Discharge Volume (gallons) | Secondary Containment Method | Secondary Containment Capacity (gallons) |
|----|---------------------|---------------------------------------------|---------------------|-----------------------------------|------------------------------|------------------------------------------|
| 1  | Produced water tank | NA - no oil                                 | Shell failure       | 8,813                             | Formed Wall                  | 62,759                                   |
| 2  | Produced water tank | NA - no oil                                 | Shell failure       | 8,813                             |                              |                                          |
| 3  | Produced water tank | NA - no oil                                 | Shell failure       | 8,813                             |                              |                                          |
| 4  | Produced water tank | NA - no oil                                 | Shell failure       | 8,813                             |                              |                                          |
| 5  | Produced water tank | NA - no oil                                 | Shell failure       | 8,813                             |                              |                                          |
| 6  | Produced water tank | NA - no oil                                 | Shell failure       | 8,813                             |                              |                                          |
| 7  | Produced water tank | NA - no oil                                 | Shell failure       | 8,813                             |                              |                                          |

## FIGURES

- Figure 1 Facility Location
- Figure 2 Facility Diagram
- Figure 3 Drainage Map



**Figure 2**  
**Lasher Injection Station Site**



100 Feet  
Scale is approximate

Legend

- Oil-containing tank
- Oil-containing equipment
- Non-oil-containing tank or equipment
- Containment berm or wall
- Oil truck loading
- Oil-containing piping
- Sheet runoff direction

Container

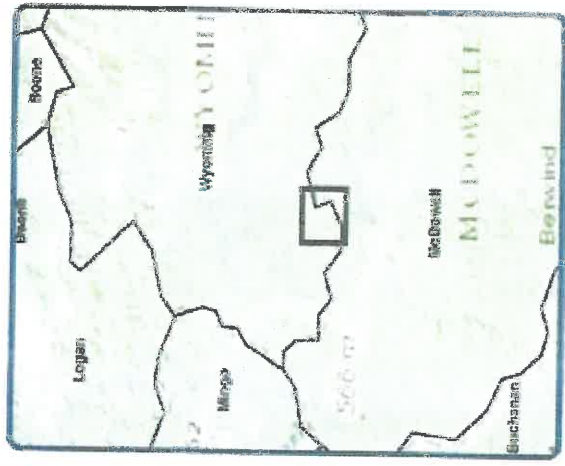
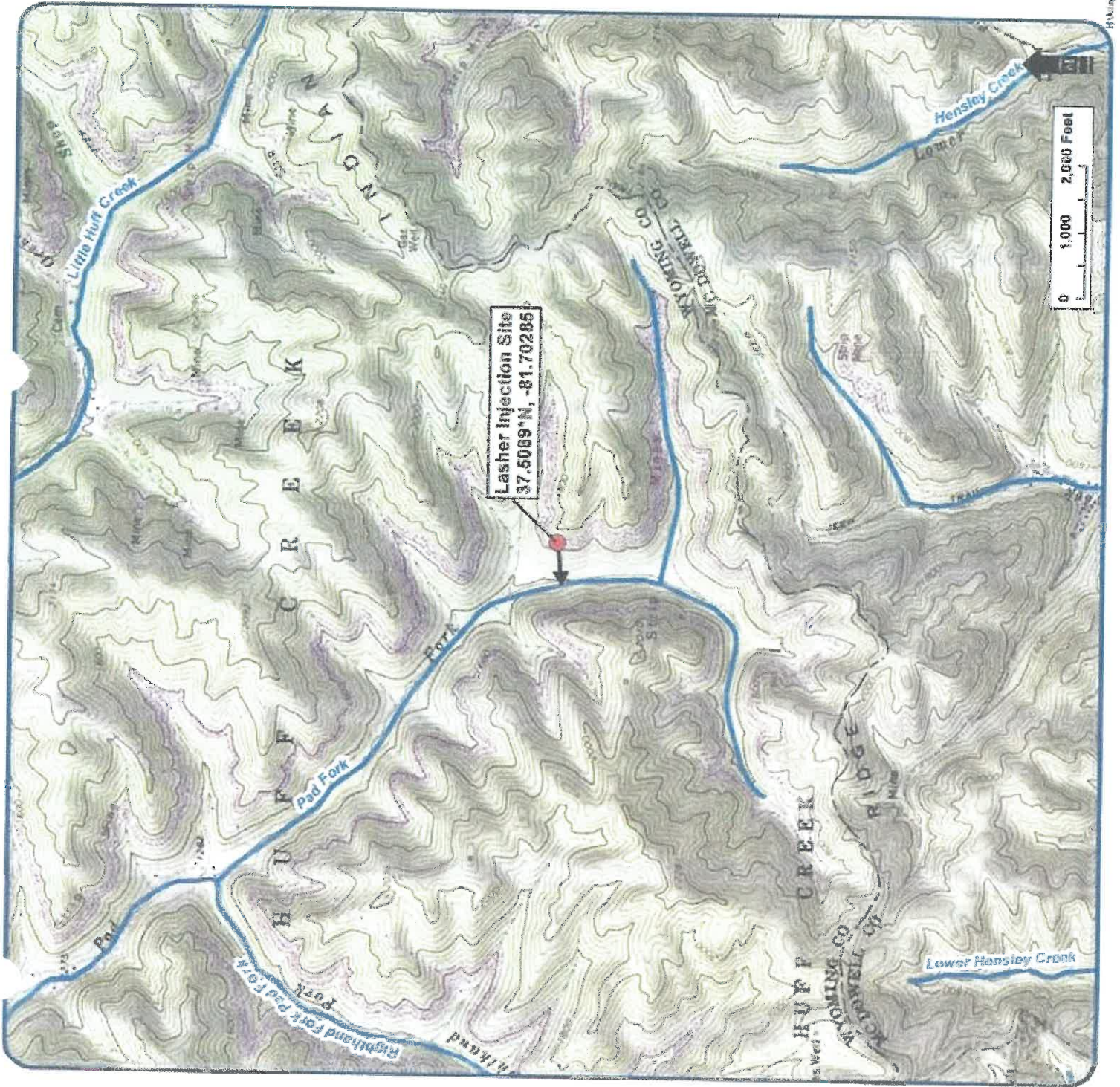
- 1 Produced water tank
- 2 Produced water tank
- 3 Produced water tank
- 4 Produced water tank
- 5 Produced water tank
- 6 Produced water tank
- 7 Produced water tank

FIGURE 3

DRAINAGE MAP

LASHER INJECTION SITE

Wyoming County, West Virginia



Site  
↑ Drainage Path  
— Stream

Data Sources: ESRI - USGS  
& World Topography Basemaps;  
Datum: GCS WGS 1984  
Date: 11/13/2014

**APPENDIX A**  
**SPILL CONTINGENCY PLAN**

# **SPILL CONTINGENCY PLAN**

*Prepared for:*



**ARP MOUNTAINEER PRODUCTION, LLC  
LASHER INJECTION STATION SITE  
PAD FORK  
HANOVER, WEST VIRGINIA 24839**

*Prepared By:*

**Zephyr Environmental Corporation  
10440 Little Patuxent Parkway, Suite 750  
Columbia, Maryland 21044**

*November 2014*



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## APPENDICES

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| APPENDIX A | SPILL NOTIFICATION FORM |
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## 1.0 INTRODUCTION

The ARP Mountaineer LLC, LASHER INJECTION STATION in Wyoming County, WV produces coal bed methane gas. Facility operations involve separation of liquid water from coal bed methane gas ("produced water") and accumulation of produced water in storage tanks. Although aggregate aboveground oil storage capacity is less than the SPCC rule threshold, the Facility has prepared a Tier I Qualified Facility SPCC Plan and Spill Contingency Plan to address the potential for a discharge from the Facility. The Facility is required to prepare a Spill Prevention Plan Response Plan in accordance with West Virginia Code, §22-30-9.

A Spill Contingency Plan required by 40 CFR 112 must follow the provisions of 40 CFR 109 and address the following elements:

- Definition of the authorities, responsibilities and duties of all persons, organizations or agencies which could be involved in planning or directing oil removal operations.
- Establishment of notification procedures for the purpose of early detection and timely notification of an oil discharge, including:
  - Identification of critical water use areas;
  - Names, telephone numbers and addresses of responsible persons, alternates, organizations and agencies to be notified; and
  - Reliable communication systems for timely notification of an oil discharge.
- Provisions to assure that full resource capability is known and can be committed, including:
  - Identification and inventory of applicable equipment, material and supplies which are available locally and regionally;
  - An estimate of the equipment, materials and supplies which would be required to remove the maximum oil discharge to be anticipated; and
  - Development of agreements and arrangements in advance of an oil discharge for the acquisition of equipment, materials and supplies to be used in responding to a discharge.
- Provisions for well defined and specific actions to be taken after discovery and notification of an oil discharge, including:
  - Specification of an oil discharge response operating team consisting of trained, prepared and available operating personnel; and
  - Pre-designation of a properly qualified oil discharge response coordinator who is charged with the responsibility and authority for directing and coordinating response operations.

A Spill Prevention Response Plan required by WV Code §22-30-9 must address the following elements:

- Site activity information, including:
  - A description of activities and processes at the site;
  - A listing and inventory of fluids stored, amounts stored and wastes generated;
  - Safety Data Sheets (SDSs) for fluids stored; and

SPILL CONTINGENCY PLAN  
ARP MOUNTAINEER PRODUCTION LLC, LASHER INJECTION STATION SITE

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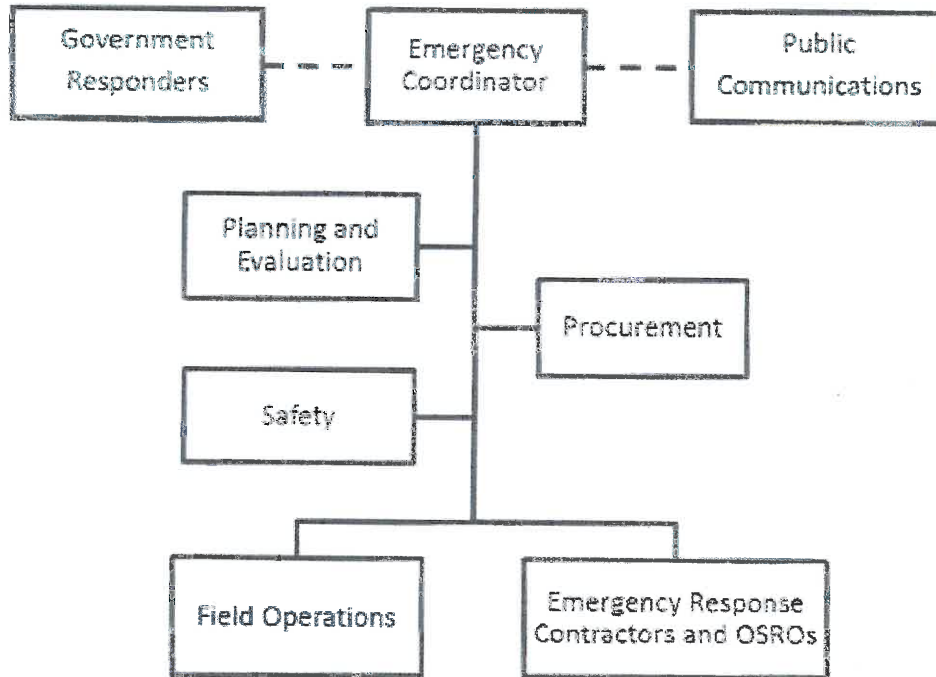
- Site drawings.
- Preventive maintenance program information, including:
  - Leak detection monitoring;
  - Inspection procedures;
  - Identification of AST stress points;
  - Employee training programs;
  - Corrosion protection and monitoring;
  - Security systems; and
  - Spill prevention measures.
- Emergency response information, including:
  - Facility staff with duties and responsibilities for developing, implementing and maintaining the Plan;
  - Chain of command at the facility;
  - Contact information for facility emergency coordinators;
  - Contact information for emergency response contractors;
  - Specific response that will be taken in the event of a release from the facility;
  - Contact information for county and municipal emergency management agencies;
  - Contact information for the nearest downstream public water supply; and
  - Contact information for the WVDEP.

## 2.0 EMERGENCY RESPONSE ORGANIZATION

This section defines the persons and organizations that could be involved in planning or directing spill response operations. These persons and organizations consist of:

- A Facility Response Team
- Contract Emergency Responders
- Government Agencies

The Emergency Coordinator for the Facility Response Team has overall responsibility for directing spill response operations. The Emergency Coordinator has direct control over internal Field Operations personnel and Emergency Response Contractors, and receives technical and supply support from internal Planning Evaluation, Safety and Procurement personnel. The Emergency Coordinator also interacts with Government Response Agencies and internal Public Communications personnel.



## 2.1 FACILITY RESPONSE TEAM

The Facility Response Team is comprised of company employees who fill roles with responsibilities as described below. Different persons may fill different roles, depending on their availability during an incident response.

**Table 2.1a Facility Response Team Roles and Responsibilities**

| Team Role               | Responsibilities                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|-------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Emergency Coordinator   | <ul style="list-style-type: none"> <li>• Ensure notification of Government Agencies, Contract Responders and Facility Response Team members</li> <li>• Assemble a Facility Response Team</li> <li>• Develop and implement an incident action plan</li> <li>• Coordinate response activities and communications</li> <li>• Assess resource needs and coordinate the ordering, deployment and release of needed resources</li> <li>• Direct Field Operations and OSRO activities</li> <li>• Interface with government agency responders</li> </ul> |
| Field Operations        | <ul style="list-style-type: none"> <li>• Perform immediate response activities at the Facility</li> <li>• Perform other on-site response activities as directed by the Emergency Coordinator</li> </ul>                                                                                                                                                                                                                                                                                                                                          |
| Planning and Evaluation | <ul style="list-style-type: none"> <li>• <b>Assess potential off-site impacts and keep the Emergency Coordinator informed</b></li> <li>• Assess progress of response activities and determine when response is complete</li> <li>• Maintain incident files for legal and historical purposes</li> <li>• Maintain and update the Plan as necessary</li> </ul>                                                                                                                                                                                     |
| Safety                  | <ul style="list-style-type: none"> <li>• Assess safety hazards and keep the Emergency Coordinator informed</li> <li>• Develop measures to ensure personnel safety</li> <li>• Bypass the chain of command when necessary to correct unsafe acts or conditions</li> </ul>                                                                                                                                                                                                                                                                          |
| Public Communications   | <ul style="list-style-type: none"> <li>• Act as a central clearing point for dissemination of information to the public and news media</li> <li>• Direct employee/family notifications</li> </ul>                                                                                                                                                                                                                                                                                                                                                |
| Procurement             | <ul style="list-style-type: none"> <li>• Procure equipment, services and materials for the incident response</li> <li>• <b>Manage payments and finances</b></li> </ul>                                                                                                                                                                                                                                                                                                                                                                           |

**Table 2.1b Facility Response Team Members**

| Name            | Role(s)                                                  |
|-----------------|----------------------------------------------------------|
| Jeff Cooper     | Emergency Coordinator                                    |
| Criss Yates     | Alternate Emergency Coordinator                          |
| Roger Laxton    | Alternate Emergency Coordinator                          |
| Johnny Carver   | Field Operations                                         |
| Jake Cook       | Field Operations                                         |
| Ronnie Cook     | Field Operations                                         |
| Robbie Horn     | Field Operations                                         |
| Claude Ray Jr.  | Field Operations                                         |
| Claude Ray III  | Field Operations                                         |
| Rocky Stillwell | Planning and Evaluation & Safety                         |
| Brian Shpakoff  | Planning and Evaluation & Safety                         |
| Jim Amendolea   | Planning and Evaluation & Safety                         |
| Rene St. Pierre | Public Communications & Procurement of Outside Resources |
|                 |                                                          |

## **2.2 CONTRACT EMERGENCY RESPONDERS**

**Table 2.2 Contract Responders**

| ERC               | Responsibilities                                                                                                                                                                                                                                                                                          |
|-------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| HEPACO            | <ul style="list-style-type: none"> <li>• Provide response equipment and trained personnel</li> <li>• Recommend and perform response activities as directed by the Emergency Coordinator</li> <li>• Assess the effectiveness of response strategies and keep the Emergency Coordinator informed</li> </ul> |
| Envirocheck, Inc. |                                                                                                                                                                                                                                                                                                           |

## 2.3 GOVERNMENT AGENCIES

**Table 2.3 Government Agencies**

| Agency                                                       | Responsibilities                                                                                                                                                                                                                                                       |
|--------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| West Virginia Department of Environmental Protection (WVDEP) | <ul style="list-style-type: none"><li>• Oversee the progress of response activities</li><li>• Communicate response objectives</li><li>• Request federal assistance if necessary</li></ul>                                                                              |
| Local Emergency Management Services (EMS)                    | <ul style="list-style-type: none"><li>• Emergency rescue services</li><li>• Fire-fighting assistance as directed by the Emergency Coordinator</li><li>• Prevent unauthorized access to affected areas</li><li>• Coordinate community evacuation if necessary</li></ul> |
| EPA Region III                                               | <ul style="list-style-type: none"><li>• Provide federal assistance if requested by WVDEP</li></ul>                                                                                                                                                                     |
| National Response Center (US Coast Guard)                    | <ul style="list-style-type: none"><li>• Communicate incident notifications to applicable government agencies</li></ul>                                                                                                                                                 |

### 3.0 NOTIFICATION PROCEDURES

This section establishes notification procedures for the purpose of early detection and timely notification of a spill or leak.

#### 3.1 REPORTING REQUIREMENTS

If a leak or spill is detected or discovered, persons, organizations and government agencies must be notified as follows. Phone numbers are listed in Table 3.3.

Table 3.1 Reporting Requirements

| Occurrence                                        | Reportable Quantity                                                  | Notify                                                                                          | Timing               |
|---------------------------------------------------|----------------------------------------------------------------------|-------------------------------------------------------------------------------------------------|----------------------|
| Leak or spill, not from a registered storage tank | Any amount on ground                                                 | Emergency Coordinator<br>Contract Responder(s)                                                  | <1 hour of discovery |
| Leak or spill, from a registered storage tank     | >25 gallons within containment, or any amount outside of containment | Emergency Coordinator<br>Contract Responder(s)<br>WVDEP<br>County EMS<br>Public Water Suppliers | <1 hour of discovery |
| Oil leak or spill to a creek or stream            | Visible oil film or sheen on surface of water                        | All of the above plus the NRC                                                                   | <1 hour of discovery |

#### 3.2 SPILL RESPONSE NOTIFICATION FORM

An example Spill Response Notification Form is provided in Appendix A. The form includes information to pass to response personnel in the event of a reportable discharge.

#### 3.3 EMERGENCY NOTIFICATION PHONE LIST

The following list contains contact information for Government Agencies, Contract Responders, Public Water Suppliers and Facility Response Team members that must be notified in the event of a discharge.

Table 3.3 Emergency Notification Phone List

| Name                                     | Address                             | Organization                       | 24-Hour Number |
|------------------------------------------|-------------------------------------|------------------------------------|----------------|
| <b>Government Agencies</b>               |                                     |                                    |                |
| Local police, fire and emergency medical | P.O. Box 568<br>Pineville, WV 24874 | Wyoming County EMS                 | 911            |
| Wyoming County LEPC                      | P.O. Box 568<br>Pineville, WV 24874 | Local Emergency Planning Committee | 304-732-6953   |

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**Table 3.3 Emergency Notification Phone List**

| <b>Name</b>                          | <b>Address</b>                                   | <b>Organization</b>                         | <b>24-Hour Number</b>        |
|--------------------------------------|--------------------------------------------------|---------------------------------------------|------------------------------|
| WVDEP                                | 4994 Elk River Road South<br>Elkview, WV 25071   | WVDEP Emergency<br>Response                 | 800-642-3074                 |
| National Response<br>Center (NRC)    | NA                                               | US Coast Guard                              | 800-424-8802                 |
| <b>Contract Emergency Responders</b> |                                                  |                                             |                              |
| HEPACO (OSRO)                        | 279 Shipley Ferry Road<br>Blountville, TN 37617  | Emergency<br>Response Contractor            | 800-888-7689                 |
| Envirocheck, Inc.                    | 120 Lovelane Street<br>Bluefield, VA 24605       | Emergency<br>Response Contractor            | 866-701-3093                 |
| <b>Public Water Suppliers</b>        |                                                  |                                             |                              |
| Davey Municipal<br>Water Works       | P.O. Box 430, Main Street<br>Davey WV 24826      | Groundwater Public<br>Water Supply Intake   | 304-656-7145                 |
| Gilbert Water Works                  | PO Box 1360<br>Gilbert, WV 25621                 | Surface Water Public<br>Water Supply Intake | 304-664-9625<br>304-664-3752 |
| <b>Facility Response Team</b>        |                                                  |                                             |                              |
| Jeff Cooper                          | 2615 Steelsburg Highway<br>Cedar Bluff, VA 24609 | Atlas   Titan                               | 276-971-3268                 |
| Criss Yates                          | 2615 Steelsburg Highway<br>Cedar Bluff, VA 24609 | Atlas   Titan                               | 276-701-7609                 |
| Roger Laxton                         | 2388 Harper Road<br>Beckley, WV 25801            | Atlas   Titan                               | 304-923-2969                 |
| Johnny Carver                        | 2615 Steelsburg Highway<br>Cedar Bluff, VA 24609 | Atlas   Titan                               | 276-202-6237                 |
| Jake Cook                            | 2388 Harper Road<br>Beckley, WV 25801            | Atlas   Titan                               | 304-923-9753                 |
| Ronnie Cook                          | 2615 Steelsburg Highway<br>Cedar Bluff, VA 24609 | Atlas   Titan                               | 276-202-7448                 |
| Robbie Horn                          | 2615 Steelsburg Highway<br>Cedar Bluff, VA 24609 | Atlas   Titan                               | 276-701-7610                 |
| Claude Ray Jr.                       | 2615 Steelsburg Highway<br>Cedar Bluff, VA 24609 | Atlas   Titan                               | 276-971-3318                 |
| Claude Ray III                       | 2615 Steelsburg Highway<br>Cedar Bluff, VA 24609 | Atlas   Titan                               | 276-210-4174                 |
| Rocky Stilwell                       | 2615 Steelsburg Highway<br>Cedar Bluff, VA 24609 | Atlas   Titan                               | 276-701-9369                 |
| Brian Shpakoff                       | 425 Houston Street<br>Ft. Worth, TX 76102        | Atlas   Titan                               | 682-209-2074                 |
| Jim Amendolea                        | 425 Houston Street<br>Ft. Worth, TX 76102        | Atlas   Titan                               | 405-550-4644                 |
| Rene St. Pierre                      | 425 Houston Street<br>Ft. Worth, TX 76102        | Atlas   Titan                               | 405-200-7395                 |

### 3.4 RESPONSE EQUIPMENT

#### 3.4.1 In-House Equipment

Facility Response Team members have been issued cell phones for communications purposes. Cell phones are considered to be a reliable means of communication. The cell phones are tested daily during normal use.

A spill kit that can be used to contain and remove small spills is available to Facility Response Team members.

#### 3.4.2 OSRO Equipment

One or more contracted OSROs listed in this Plan will provide discharge removal equipment and personnel. OSROs listed in this Plan are capable of cleaning up any oil discharge from the Facility. The following types of equipment are available:

- Skimmers and pumps
- Containment boom
- Dispersant
- Sorbents
- Hand tools
- Communication equipment
- Fire fighting and personal protective equipment
- Heavy equipment, boats and motors

OSROs are responsible for testing their response equipment and training their employees in the operation of the equipment, consistent with the US Coast Guard's program for rating of OSRO capabilities.

## 4.0 RESPONSE ACTIONS

This section defines actions to be taken after discovery of a discharge.

### 4.1 DISCHARGE DETECTION

The Facility is normally unattended. Facility personnel usually inspect the Facility at least once per day. Any oil or pollutant discharge that could occur should be discovered during daily inspections. Activities that involve a higher risk of a discharge, such as truck loading, gathering line blowdown and Facility maintenance, occur when Facility personnel are present at the Facility.

### 4.2 IMMEDIATE ACTIONS

Immediate response actions to be taken in the event of an actual or threatened discharge, prior to implementation of removal actions, are as follows.

**Table 4.2 Immediate Response Actions**

| Action                                                                                             | When                                                                   | Responsibility                                    |
|----------------------------------------------------------------------------------------------------|------------------------------------------------------------------------|---------------------------------------------------|
| Notify the Operations Supervisor and HSE                                                           | Immediately, upon discovery of an actual or threatened discharge       | Field Operations                                  |
| Assess the Facility for hazardous conditions                                                       | Immediately, upon discovery of an actual or threatened discharge       | Field Operations                                  |
| Evacuate Facility areas where hazardous conditions exist                                           | Immediately, after assessing areas for hazardous conditions            | Field Operations                                  |
| Eliminate ignition sources in hazardous areas                                                      | Immediately, after assessing plant areas for hazardous conditions      | Field Operations                                  |
| Stop flow by closing valves and isolating the spill source                                         | Immediately, after determining that the area is safe to enter          | Field Operations                                  |
| Verify that secondary containment drains are tightly closed                                        | Immediately, after determining that the area is safe to enter          | Field Operations                                  |
| Determine whether a discharge is reportable                                                        | Immediately, after being notified of an actual or threatened discharge | Emergency Coordinator or designee                 |
| Notify Government Agencies, Public Water Suppliers, Contract Responders and Facility Response Team | Immediately, after determining that a discharge is reportable          | Emergency Coordinator or designee                 |
| Initiate spill containment by deploying absorbent material, containment booms, etc.                | As soon as responders mobilize on-site                                 | Field Operations Coordinator and Field Operations |

### 4.3 REMOVAL ACTIONS

Response actions for a discharge are described in Table 4.3. The highest overall priority for response actions should be to prevent the spread of discharged material to the greatest extent possible. Decisions regarding specific actions to contain and remove discharged material need to be made by the Emergency Coordinator based on actual conditions during an incident, taking into account circumstances such as:

- Location. Knowledge of the location of discharged material is essential to an effective response. If the location of discharged material is unknown or uncertain, proactive measures such as deployment of containment boom, barriers or sorbent at more distant locations should be considered.
- Precipitation. Precipitation could spread discharged material at a faster rate and in greater quantities than would occur during dry weather conditions.
- Vulnerability of nearby environmental receptors. Runoff from the Facility flows over land to streams, creeks and rivers. The presence of sensitive environmental receptors in waterways may affect the timing and priority of response actions.

Except for small spills that can be rapidly cleaned-up by Facility personnel on-site, containment and removal actions will be performed by Contract Emergency Responders. Emergency Response Contractors listed in this Plan are capable of responding to a discharge from the Facility. At least one Coast Guard-rated Oil Spill Removal Organization (OSRO) is included.

Required resources and timing shown in Table 4.3 represent minimum levels of response that are anticipated for a discharge. In all cases, steps should be taken to expedite clean-up rapidly and prevent the spread of discharged material. Expeditious response must include consideration of the following additional actions, as appropriate to the incident magnitude:

- Contracting with additional OSROs. In addition to Contract Emergency Responders listed in this Plan, the US Coast Guard maintains a listing of rated OSROs that are capable of responding to an oil discharge in the region. Additional OSROs will be contacted if it is determined that additional containment boom, oil recovery capacity and temporary storage capacity are needed.
- Contracting with general contractors. Shoreline clean-up can be expanded using equipment and laborers provided by general contractors. Training for shore clean-up can be contracted and rapidly provided to laborers. Labor contractors and training resources are readily available in the region.

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**Table 4.3 Response to a Discharge**

| <b>Action</b>                                                                                                                                                                                                                                                                                                                                                     | <b>Timing</b>        | <b>Required Resources</b>                        | <b>Response Personnel</b>         |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|--------------------------------------------------|-----------------------------------|
| 1. Implement immediate response actions (Table 4.2).                                                                                                                                                                                                                                                                                                              | <1 hour of discovery | NA                                               | Facility Response Team            |
| 2. Continually assess: <ul style="list-style-type: none"> <li>• Location and quantity of discharged material</li> <li>• Possible movement of discharged material</li> <li>• Proximity to water intakes</li> <li>• Discharged material containment and removal strategies</li> <li>• Adequacy of resources on-hand</li> <li>• Additional resource needs</li> </ul> | On-going             | NA                                               | Facility Response Team            |
| 3. Continually coordinate communications with: <ul style="list-style-type: none"> <li>• Government on-scene coordinators</li> <li>• Contracted responders</li> <li>• News media</li> </ul>                                                                                                                                                                        | On-going             | NA                                               | Facility Response Team            |
| <b>If Contract Emergency Responder assistance is not needed:</b>                                                                                                                                                                                                                                                                                                  |                      |                                                  |                                   |
| 4. Apply absorbent materials to discharged material.                                                                                                                                                                                                                                                                                                              | 1 hour               | In-house spill kit                               | Facility Response Team            |
| 5. Remove contaminated adsorbent materials, soil and environmental media.                                                                                                                                                                                                                                                                                         | As soon as possible  | Hand tools, approved containers                  | Facility Response Team            |
| <b>If Contract Emergency Responder assistance is needed:</b>                                                                                                                                                                                                                                                                                                      |                      |                                                  |                                   |
| 6. Deploy absorbent materials, containment boom or other temporary barriers in drainage pathways.                                                                                                                                                                                                                                                                 | 2 hours              | Up to 1,000 feet of containment boom             | Contractor(s) listed in Table 2.2 |
| 7. Deploy vacuum trucks and absorbent material as needed to recover discharged material.                                                                                                                                                                                                                                                                          | 2 hours              | Up to 2,100 gpd recovery capacity                | Contractor(s) listed in Table 2.2 |
| 8. Remove oil-contaminated adsorbent materials, soil and environmental media.                                                                                                                                                                                                                                                                                     | As soon as possible  | Heavy equipment, hand tools, approved containers | Contractor(s) listed in Table 2.2 |
| <b>Following completion of removal activities:</b>                                                                                                                                                                                                                                                                                                                |                      |                                                  |                                   |
| 9. Perform incident response critique and implement any recommendations.                                                                                                                                                                                                                                                                                          | Removal complete     | NA                                               | Facility response team            |

Table 4.3 Response to a Discharge

| Action                                                                                                                                                                                                                                    | Timing             | Required Resources | Response Personnel |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------|--------------------|--------------------|
| 10. Submit written reports: <ul style="list-style-type: none"><li>• To WVDEP, for any reportable spill</li><li>• To EPA, if 1,000 gals was spilled to water, or if 42+ gals was spilled to water twice in 12 months<sup>1</sup></li></ul> | 10 days<br>60 days | NA                 | NA                 |

---

<sup>1</sup> Refer to 40 CFR 112.4(a) for information that must be reported.

## 5.0 RESPONSE PLANNING

This section describes provisions to assure that planned resources are adequate to respond to a potential discharge from the Facility.

### 5.1 DISCHARGE SCENARIOS

The following discharge scenarios are assumed for planning purposes:

**Table 5.1 Discharge Scenarios**

| Scenario                                                         | Quantity      |
|------------------------------------------------------------------|---------------|
| Failure of an aboveground storage tank and secondary containment | 8,813 gallons |
| Failure of a vacuum truck hose or hose connection                | 5 gallons     |

### 5.2 VULNERABILITY ANALYSIS

A discharge from the Facility could reach environmental receptors as described in this section. Potentially vulnerable environmental receptors are identified within a planning distance from the Facility as follows.

- For groundwater public water supply, the planning distance is the distance to the nearest groundwater public water supply intake as identified by the WVDEP.
- For surface water public water supply, the planning distance is the distance to the nearest downstream surface water public water supply intake as identified by the WVDEP.
- For all other environmental receptors, the planning distance is the distance that an oil discharge could travel as determined using calculations in Appendix C of 40 CFR 112.

The vulnerability of public water supplies in West Virginia to potential discharge sources is evaluated by the WVDEP in accordance with procedures in WV Code §22-30-9. The evaluation involves calculation of a "source water protection area" for each groundwater public water supply and a "zone of critical concern" for each surface water public water supply. A potential discharge source (i.e. aboveground storage tank) that is located within a source water protection area or a zone of critical concern is considered to pose a higher degree of risk to public health and the environment. The WVDEP has determined that the Facility covered by this Plan is not located within the source water protection area or zone of critical concern for any public water supply in West Virginia.

Surface water pathways within the planning distance downstream from the Facility are described in Table 5.2a. Identified environmental receptors within the planning distance are described in Table 5.2b.

**Table 5.2a Surface Water Pathways Within the Planning Distance**

| Pathway                              | Distance, miles | Time, hours |
|--------------------------------------|-----------------|-------------|
| Facility → Pad Fork (land)           | 0.2             | <1          |
| Pad Fork → Little Huff Creek         | 2.8             | 2           |
| Little Huff Creek → Guyandotte River | 11              | 7           |
| Guyandotte River → Guyandotte River  | 35              | 19          |

The following environmental receptors have been identified within the planning distance.

**Table 5.2b Environmental Receptors**

| Receptor                                 | Description                 | Location                                            |
|------------------------------------------|-----------------------------|-----------------------------------------------------|
| Groundwater public water supply well     | Davey Municipal Water Works | 3 miles from Facility                               |
| Surface water public water supply intake | Gilbert Water Works         | Guyandotte River, 20 miles downstream from Facility |

### 5.3 RESOURCE NEEDS

The US Coast Guard rates the response capabilities of oil spill response organizations. An organization that is rated MMPD (Maximum Most Probable Discharge) response in Rivers and Canals operating environment should be capable of removing any potential discharge from the Facility based on US EPA guidelines for oil spill response resource planning<sup>2</sup>. At least one Contract Responder listed in this Plan is rated MMPD for the region.

### 5.4 DISPOSAL PLANS

Recovery operations will include pumping the recovered oil/water emulsion directly into tanker trucks to be hauled away. Temporary storage may be arranged in the form of mobile temporary storage tanks. Oil contaminated debris, sorbent materials, disposable suits, and other solid wastes will be collected and contained for proper disposal as industrial waste.

---

<sup>2</sup> 40 CFR 112, Appendix E.

**APPENDIX A  
SPILL NOTIFICATION FORM**

# INFORMATION ON MATERIAL DISCHARGE

It is not necessary to wait for all information before calling the National Response Center.

| Reporting party                |              |                |             |            |
|--------------------------------|--------------|----------------|-------------|------------|
| Name:                          |              |                |             |            |
| Phone:                         |              |                |             |            |
| Company:                       |              |                |             |            |
| Position:                      |              |                |             |            |
| Address:                       |              |                |             |            |
| City:                          |              |                |             |            |
| State:                         |              |                |             |            |
| Zip:                           |              |                |             |            |
| Latitude:                      |              |                |             |            |
| Longitude:                     |              |                |             |            |
| Incident Description           |              |                |             |            |
| Date:                          |              | Time:          |             |            |
| Source:                        |              |                |             |            |
| Cause:                         |              |                |             |            |
| Materials Involved             |              |                |             |            |
| Material Discharged:           |              |                |             |            |
| Quantity Discharged (gallons): |              |                |             |            |
| Quantity in Water (gallons):   |              |                |             |            |
| Response Actions Taken         |              |                |             |            |
|                                |              |                |             |            |
| Impact                         |              |                |             |            |
| Injuries?                      |              | Fatalities?    |             |            |
| Evacuations?                   |              | Who Evacuated? |             |            |
| Damage?                        |              | What Damaged?  |             |            |
| Additional Information         |              |                |             |            |
|                                |              |                |             |            |
| Caller Notifications           |              |                |             |            |
|                                | Phone Number | Report Date    | Report Time | Report No. |
| National Response Center       | 800-424-8802 |                |             |            |
| WWDEP                          | 800-642-3074 |                |             |            |
| Local Emergency Agencies       | 911          |                |             |            |
| Other (specify)                |              |                |             |            |

**APPENDIX B**  
**INSPECTION PROCEDURES**

**SPCC Field Inspections - Virginia/West Virginia**

---

**BASIC INFORMATION**

---

Name  
Title  
Location Name  
Inspection Date  
Time**INSPECTION INLET SLUG CATCHER (TANK CONTAINMENT)**

---

Is there any standing water in the containment area?  
Is there any debris or fire hazards in the containment area?  
Are containment walls eroded or deteriorated?  
Is staining evident in the containment area?  
Tank Containment - Comments (Be specific)  
Photo**INSPECTION INLET SLUG CATCHER (PIPING & VALVES)**

---

Is there an indication of any leak by sight, smell, or sound?  
Is any valve, pipe, or pipe connection leaking?  
Are piping supports damaged or corroded?  
Is piping corroded?  
Piping & Valves - Comments (Be specific)  
Photo**INSPECTION ELECTRIC TRANSFORMER (TANK CONTAINMENT)**

---

Is staining evident in the containment area?  
Comments (Be specific)  
Photo**INSPECTION PIPELINE DRIP TANK (TANK CONTAINMENT)**

---

Is there standing water in the containment area?  
Is there any debris or fire hazards in the containment area?  
Are containment walls eroded or deteriorated?  
Is staining evident in the containment area?  
Tank Containment - Comments (Be specific)  
Photo**INSPECTION PIPELINE DRIP TANK (TANKS)**

---

Is there noticeable distortion or bulging of the tank?  
Is the shell or roof corroded?  
Are there any obvious holes?  
Tanks - Comments (Be specific)  
Photo**INSPECTION PIPELINE DRIP TANK (PIPING AND VALVES)**

---

**SPCC Field Inspections - Virginia/West Virginia**

---

Is there an indication of any leak by sight, smell, or sound?

Piping and Valves - Comments (Be specific)

Photo

**INSPECTION LUBE/USED OIL TOTES (TANK CONTAINMENT)**

---

Is there any standing water in the containment area?

Is there any debris or fire hazards in the containment area?

Are containment walls eroded or deteriorated?

Is staining evident in the containment area?

Tank Containment - Comments (Be specific)

Photo

**INSPECTION FRAC TANK (TANK CONTAINMENT)**

---

Is there any standing water in the containment area?

Is there any debris or fire hazards in the containment area?

Are containment walls eroded or deteriorated?

Is staining evident in the containment area?

Tank Containment - Comments (Be specific)

Photo

**INSPECTION FRAC TANK (TANKS)**

---

Is there noticeable distortion or bulging of the tank?

Is the shell or roof corroded?

Are there any obvious holes present?

Tanks - Comments (Be specific)

Photo

**INSPECTION FRAC TANK (PIPING AND VALVES)**

---

Is there an indication of any leak by sight, smell, or sound?

Piping and Valves - Comments (Be specific)

Photo

**INSPECTION USED OIL TANK (TANK CONTAINMENT)**

---

Is there any standing water in the containment area?

Is there any debris or fire hazards in the containment area?

Are containment walls eroded or deteriorated?

Is staining evident in the containment area?

Tank Containment - Comments (Be specific)

Photo

**INSPECTION USED OIL TANK (TANKS)**

---

Is there noticeable distortion or bulging of the tank?

Is the shell or roof corroded?

**SPCC Field Inspections - Virginia/West Virginia**

---

Are there any obvious holes present?  
Tanks - Comments (Be specific)  
Photo

**INSPECTION USED OIL TANK (PIPING AND VALVES)**

---

Is there an indication of any leak by sight, smell, or sound?  
Piping and Valves - Comments (Be specific)  
Photo

**INSPECTION LUBE OIL TANK (TANK CONTAINMENT)**

---

Is there standing water in the containment area?  
Is there any debris or fire hazards in the containment area?  
Are containment walls eroded or deteriorated?  
Is staining evident in the containment area?  
Tank Containment - Comments (Be specific)  
Photo

**INSPECTION LUBE OIL TANK (TANKS)**

---

Is there noticeable distortion or bulging of the tank?  
Is the shell or roof corroded?  
Are there any obvious holes present?  
Tanks - Comments (Be specific)  
Photo

**INSPECTION LUBE OIL TANK (PIPING AND VALVES)**

---

Is there an indication of any leak by sight, smell, or sound?  
Piping and Valves - Comments (Be specific)  
Photo

**INSPECTION METHANOL TANK (TANK CONTAINMENT)**

---

Is there standing water in the containment area?  
Is there any debris or fire hazards in the containment area?  
Are containment walls eroded or deteriorated?  
Is staining evident in the containment area?  
Tank Containment - Comments (Be specific)  
Photo

**INSPECTION METHANOL TANK (TANKS)**

---

Is there noticeable distortion or bulging of the tank?  
Is the shell or roof corroded?  
Are there any obvious holes present?  
Tanks - Comments (Be specific)  
Photo

**INSPECTION METHANOL TANK (PIPING AND VALVES)**

---

**SPCC Field Inspections - Virginia/West Virginia**

---

Is there an indication of any leak by sight, smell, or sound?

Piping and Valves - Comments (Be specific)

Photo

**INSPECTION SULFIDE TREATER SEPARATOR**

---

Is any valve, pipe, or pipe connection leaking?

Are piping supports damaged or corroded?

Is piping corroded?

Piping & Valves - Comments (Be specific)

Photo

Is the separator or scrubber corroded?

Is staining evident under the separator or scrubber?

Separator & Compressor - Comments (Be specific)

Photo

**INSPECTION DISCHARGE SEPARATOR**

---

Is any valve, pipe, or pipe connection leaking?

Are piping supports damaged or corroded?

Is piping corroded?

Piping & Valves - Comments (Be specific)

Photo

Is the separator or scrubber corroded?

Is staining evident under the separator or scrubber?

Separator & Compressor - Comments (Be specific)

Photo

**INSPECTION COMPRESSOR ENGINE**

---

**Compressor Name (Please Type)**

Is there any staining or discoloration of the tank due to corrosion?

Tanks - Comments (Be specific)

Photo

Is there an indication of any leaks from piping and/or valves by sight, smell, or sound?

Piping and Valves - Comments (Be specific)

Photo

Is staining evident under the separator or compressor?

Separators and Compressor - Comments (Be specific)

Photo

**INSPECTION SCRUBBER**

---

Is there any staining or discoloration of the tank due to corrosion?

Tanks - Comments (Be specific)

Photo

Is there an indication of any piping/valve leak by sight, smell, or sound?

Piping and Valves - Comments (Be specific)

Photo



Titan Energy, LLC  
425 Houston Street, Suite 300  
Fort Worth, Texas 76102

No.:  
Date: 12/19/2017

**SPCC Field Inspections - Virginia/West Virginia**

---

Is there staining evident under the separator or scrubber?  
Separators and Dump Valves - Comments (Be specific)  
Photo

**ADDITIONAL COMMENTS AND PHOTOS**

---

Additional Comments (if needed)  
Photo  
Photo  
Photo

**APPENDIX C**  
**CONTAINMENT DRAINING PROCEDURES**

# Secondary Containment Area Draining Form

| Site | 2           |             |                   | 3           |             |                   | 4 |
|------|-------------|-------------|-------------------|-------------|-------------|-------------------|---|
|      | Date Opened | Time Opened | Operator Initials | Date Closed | Time Closed | Operator Initials |   |
| 1    |             |             |                   |             |             |                   |   |
|      |             |             |                   |             |             |                   |   |
|      |             |             |                   |             |             |                   |   |
|      |             |             |                   |             |             |                   |   |
|      |             |             |                   |             |             |                   |   |
|      |             |             |                   |             |             |                   |   |
|      |             |             |                   |             |             |                   |   |
|      |             |             |                   |             |             |                   |   |
|      |             |             |                   |             |             |                   |   |
|      |             |             |                   |             |             |                   |   |
|      |             |             |                   |             |             |                   |   |
|      |             |             |                   |             |             |                   |   |
|      |             |             |                   |             |             |                   |   |
|      |             |             |                   |             |             |                   |   |
|      |             |             |                   |             |             |                   |   |

## Secondary Containment Area Draining Instructions

|   |                                                                                                                                           |
|---|-------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | a. Complete a row of this form for each time period when a secondary containment area is drained.                                         |
|   | b. Drains are to remain closed at all times, except when necessary to remove uncontaminated rainwater.                                    |
|   | c. Accumulated rainwater must be drained as soon as possible, but no later than within 72 hours.                                          |
| 2 | a. Before opening a containment area drain, visually inspect accumulated rainwater for visible oil or an oil sheen.                       |
|   | b. Do not drain water that is visibly contaminated. If contamination is evident, notify supervision and arrange for prompt removal of the |
|   | c. Record the date and time when a containment area drain is opened, and initial the form.                                                |
| 3 | a. Drains must be promptly closed after accumulated rainwater has been drained.                                                           |
|   | b. Record the date and time when a containment area drain valve is closed, and initial the form.                                          |
| 4 | a. Note any observations on the form.                                                                                                     |

APPENDIX D  
SECONDARY CONTAINMENT CALCULATIONS

## Calculation of Secondary Containment Capacity Lasher Injection Well

### Tank Dimensions

| Tank ID            | Diameter | Height  | Volume   | Volume    | Comments |
|--------------------|----------|---------|----------|-----------|----------|
| Lasher Injection 1 | 10.0 ft  | 15.0 ft | 1,178 cf | 8,813 gal |          |
| Lasher Injection 2 | 10.0 ft  | 15.0 ft | 1,178 cf | 8,813 gal |          |
| Lasher Injection 3 | 10.0 ft  | 15.0 ft | 1,178 cf | 8,813 gal |          |
| Lasher Injection 4 | 10.0 ft  | 15.0 ft | 1,178 cf | 8,813 gal |          |
| Lasher Injection 5 | 10.0 ft  | 15.0 ft | 1,178 cf | 8,813 gal |          |
| Lasher Injection 6 | 10.0 ft  | 15.0 ft | 1,178 cf | 8,813 gal |          |
| Lasher Injection 7 | 10.0 ft  | 15.0 ft | 1,178 cf | 8,813 gal |          |

### Containment Dimensions

|                |           | Volume   | Volume     | Comments                          |
|----------------|-----------|----------|------------|-----------------------------------|
| Shape          | Rectangle |          |            |                                   |
| Wall slope     | 0:1       |          |            | As observed in the field          |
| Height         | 3.3 ft    |          |            | As measured in the field          |
| Top length     | 99.0 ft   |          |            | As measured in the field          |
| Top width      | 30.8 ft   |          |            | As measured in the field          |
| Bottom length  | 99.0 ft   |          |            | Top length - (height x slope x 2) |
| Bottom width   | 30.8 ft   |          |            | Top width - (height x slope x 2)  |
| Gross capacity |           | 9,921 cf | 74,216 gal |                                   |

### Precipitation

|                   | Depth  | Volume   | Volume    | Comments                       |
|-------------------|--------|----------|-----------|--------------------------------|
| 25-yr, 24-hr rain | 4.5 in | 1,145 cf | 8,563 gal | NWS Technical Paper 40 (TP-40) |

### Other Tank Displacement

| Tank ID            | Diameter | Height | Volume | Volume    | Comments |
|--------------------|----------|--------|--------|-----------|----------|
| Lasher Injection 2 | 10.0 ft  | 3.3 ft | 255 cf | 1,910 gal |          |
| Lasher Injection 3 | 10.0 ft  | 3.3 ft | 255 cf | 1,910 gal |          |
| Lasher Injection 4 | 10.0 ft  | 3.3 ft | 255 cf | 1,910 gal |          |
| Lasher Injection 5 | 10.0 ft  | 3.3 ft | 255 cf | 1,910 gal |          |
| Lasher Injection 6 | 10.0 ft  | 3.3 ft | 255 cf | 1,910 gal |          |
| Lasher Injection 7 | 10.0 ft  | 3.3 ft | 255 cf | 1,910 gal |          |

### Containment Capacity Check

|                                              | Volume   | Volume     | Comments             |
|----------------------------------------------|----------|------------|----------------------|
| Gross capacity                               | 9,921 cf | 74,216 gal |                      |
| Other tank displacement                      | 1,532 cf | 11,457 gal |                      |
| Net capacity                                 | 8,389 cf | 62,759 gal |                      |
| Largest tank capacity                        | 1,178 cf | 8,813 gal  |                      |
| Precipitation                                | 1,145 cf | 8,563 gal  |                      |
| Net capacity - tank capacity - precipitation | 6,066 cf | 45,382 gal | Capacity is Adequate |

**APPENDIX E**  
**SAFETY DATA SHEETS**

**Produced water that is stored at the Facility is not a “Hazardous Chemical” as defined by OSHA’s Hazard Communication Standard (29 CFR 1910.1200). A Safety Data Sheet (SDS) for produced water is not required to be prepared and is not available.**

**APPENDIX F**  
**SUBSTANTIAL HARM CERTIFICATION**

**CERTIFICATION OF THE APPLICABILITY  
OF THE SUBSTANTIAL HARM CRITERIA CHECKLIST**

FACILITY NAME: Lasher Injection Station Site  
FACILITY ADDRESS: Pad Fork, Hanover WV 24839

1. Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?  Yes  No

2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil storage tank area?  Yes  No

3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the formula in Attachment C-III, Appendix C, 40 CFR 112 or a comparable formula<sup>1</sup>) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments? For further description of fish and wildlife and sensitive environments, see Appendices I, II, and III to DOC/NOAA's "Guidance for Facility and Vessel Response Environments" (Section 10, Appendix E, 40 CFR 112 for availability) and the applicable Area Contingency Plan.  Yes  No

4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula (Attachment C-III, Appendix C, 40 CFR 112 or a comparable formula<sup>1</sup>) such that a discharge from the facility would shut down a public drinking water intake<sup>2</sup>?  Yes  No

<sup>1</sup> If a comparable formula is used, documentation of the reliability and analytical soundness of the comparable formula must be attached to this form.

<sup>2</sup> For the purposes of 40 CFR 112, public drinking water intakes are analogous to public water systems as described at 40 CFR 143.2(c).

5. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last 5 years?  Yes  No

**Certification**

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate and complete.

Signature Jeff Cooper  
Name (print or type) Jeff Cooper  
Title Production Foreman  
Date 1-5-2018

**Appendix K**  
***Other Permit Approvals***

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## APPENDIX K

**Identify permit or construction approvals received  
or applied for under the following programs:**

| Permit/approvals                                                | ID Number                                   |
|-----------------------------------------------------------------|---------------------------------------------|
| Hazardous Waste Management Program under RCRA                   | NA                                          |
| NPDES Program                                                   | NA                                          |
| Prevention of Significant Deterioration (PSD)                   | NA                                          |
| Nonattainment Program                                           | NA                                          |
| Dredge or Fill                                                  | NA                                          |
| NPDES/NPDES – Stormwater                                        | NA                                          |
| WVDEP – Office of Waste Management (OWM) – Solid Waste Facility | Blanket permit with Raleigh County Landfill |
| WVDEP – OWM – RCRA (Hazardous Waste TSD or Transporter)         | NA                                          |
| WVDEP – OWM – UST                                               | NA                                          |
| CERCLA – Superfund                                              | NA                                          |
| WV Voluntary Remediation – Brownfields                          | NA                                          |
| FIFRA – Federal Insecticide, Fungicide and Rodenticide Act      | NA                                          |
| Well Head Protection Program (WHPP)                             | NA                                          |
| Underground Injection Control (UIC)                             | UIC 2D10902032                              |
| Toxic Substances Control Act (TSCA)                             | NA                                          |
| Best Management Plans                                           | NA                                          |
| Management of Used Oil                                          | Recycled as needed                          |
| Other Relevant Permits (Specify):                               |                                             |
| AST Act                                                         | Tanks registered with DWWM                  |
|                                                                 | 055-00000979-985                            |
|                                                                 | (attached)                                  |
|                                                                 |                                             |
|                                                                 |                                             |

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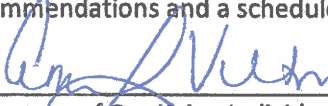
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**INTERIM ANNUAL INSPECTION CERTIFICATION**  
**Aboveground Storage Tank**  
(tank, associated equipment, leak detection system and secondary containment structure, if applicable)  
**Is Fit for Service**

|                                                     |                                                                                               |
|-----------------------------------------------------|-----------------------------------------------------------------------------------------------|
| <b>AST Facility Name</b>                            | <b>Lasher LITB-1</b>                                                                          |
| Address                                             | RIDC Park West, Park Place Corporate Center One<br>1000 Commerce Drive, 4 <sup>th</sup> Floor |
| City, State, Zip                                    | Pittsburgh, PA 15275                                                                          |
| <b>Tank Owner Name</b>                              | <b>ARP Mountaineer Production, LLC</b>                                                        |
| Telephone Number                                    | 724-301-9089                                                                                  |
| Email Address                                       | KElkin@atlasenergy.com                                                                        |
| <b>Certifying Individual</b>                        | Amy L. Veltri, P.E.                                                                           |
| Address                                             | 171 Montour Run Road                                                                          |
| City, State, Zip                                    | Moon Township, PA 15108                                                                       |
| Telephone Number                                    | 412-719-6300                                                                                  |
| Email Address                                       | aveltri@ngeconsulting.com                                                                     |
| <b>Facility's/Owner's Tank ID #</b>                 | <b>LITB-1</b>                                                                                 |
| <b>DEP Tank Registration Number<br/>(if issued)</b> | <b>055-00000979</b>                                                                           |

I certify that I have personally examined and/or am familiar with the inspection performed on the AST listed above, including its associated equipment, leak detection system and secondary containment structure, if applicable, and that I am a person eligible to perform such inspection pursuant to W.Va. Code § 22-30-6 and/or 47 CSR 62-3. As no minimum standards have been adopted by the Act or by legislative rule as of the date of this certification, I certify pursuant to W.Va. Code § 22-30-6(a), based on my direct knowledge and/or my inquiry of those individuals immediately responsible for obtaining the information, that the AST listed above, including its associated equipment, leak detection system and secondary containment structure, if applicable, is fit for service and no apparent threat of leakage exists. Deficiencies, if any, found during the inspection of the AST, including its associated equipment, leak detection system and secondary containment structure, if applicable, are described in the attached document(s) along with my recommendations and a schedule for abating said deficiencies.

  
\_\_\_\_\_  
\*Signature of Certifying Individual

12/01/2014  
\_\_\_\_\_  
Date Signed

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WV PE#14241  
\_\_\_\_\_  
P.E. Registration #, STI Certification # or  
API Certification # (if applicable)

06/30/2015  
\_\_\_\_\_  
Registration/Certification Expiration Date  
(if applicable)

**See back page for noted deficiencies and recommendations.**

\*Please refer to Interpretive Rule §47-62-3 to determine who must certify your tank.

### AST Recommendations & Containment Conditions

The AST Act requires that aboveground storage tank maintenance work shall commence within six months from the date a permit (if necessary) is issued and must be completed within one year of commencement. Although permits are not necessary for the ASTs associated with this project, for the purposes of the Engineer's Certification, we are proposing to meet this schedule. As such, maintenance work, including any required additional evaluation efforts, for the items which are noted on the Fit for Service Form, shall be completed no later than June 30, 2016.

|                          |                                                          |
|--------------------------|----------------------------------------------------------|
| <b>AST Facility Name</b> | <b>ARP Mountaineer Production, LLC<br/>Lasher LITB-1</b> |
|--------------------------|----------------------------------------------------------|

#### Deficiencies and Recommendations:

- Continue periodic visual inspections of tank and associated systems for leak detection.
- Signage needs installed (NFPA label or standard WVDEP required signage)
- Elevate tank to reduce corrosion potential and facilitate leak detection and future inspections
- Security issues need addressed, as appropriate, to minimize potential unauthorized release (e.g., remove handles from valves, install plugs in lines, install lock on tank valves, fence area around tank, or other security measures)
- Stairway repair needed
- Install piping support
- Repair heat tracing and insulation on associated piping systems
- Cracks or holes noted in containment - repair noted areas
- Drain associated with containment has no valve (containment has some type of opening that can't be closed) or is left open
- Stability of dike questionable - ensure dike stability
- Cannot be determined if containment is sufficiently impervious – complete evaluation of permeability of containment area and upgrade as needed, in conformance with developing regulatory guidance

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**INTERIM ANNUAL INSPECTION CERTIFICATION**  
**Aboveground Storage Tank**  
 (tank, associated equipment, leak detection system and secondary containment structure, if applicable)  
**Is Fit for Service**

|                                                 |                                                                                               |
|-------------------------------------------------|-----------------------------------------------------------------------------------------------|
| <b>AST Facility Name</b>                        | <b>Lasher LITB-2</b>                                                                          |
| Address                                         | RIDC Park West, Park Place Corporate Center One<br>1000 Commerce Drive, 4 <sup>th</sup> Floor |
| City, State, Zip                                | Pittsburgh, PA 15275                                                                          |
| <b>Tank Owner Name</b>                          | <b>ARP Mountaineer Production, LLC</b>                                                        |
| Telephone Number                                | 724-301-9089                                                                                  |
| Email Address                                   | KElkin@atlasenergy.com                                                                        |
| <b>Certifying Individual</b>                    | Amy L. Veltri, P.E.                                                                           |
| Address                                         | 171 Montour Run Road                                                                          |
| City, State, Zip                                | Moon Township, PA 15108                                                                       |
| Telephone Number                                | 412-719-6300                                                                                  |
| Email Address                                   | aveltri@ngeconsulting.com                                                                     |
| <b>Facility's/Owner's Tank ID #</b>             | <b>LITB-2</b>                                                                                 |
| <b>DEP Tank Registration Number (if issued)</b> | <b>055-00000985</b>                                                                           |

I certify that I have personally examined and/or am familiar with the inspection performed on the AST listed above, including its associated equipment, leak detection system and secondary containment structure, if applicable, and that I am a person eligible to perform such inspection pursuant to W.Va. Code § 22-30-6 and/or 47 CSR 62-3. As no minimum standards have been adopted by the Act or by legislative rule as of the date of this certification, I certify pursuant to W.Va. Code § 22-30-6(a), based on my direct knowledge and/or my inquiry of those individuals immediately responsible for obtaining the information, that the AST listed above, including its associated equipment, leak detection system and secondary containment structure, if applicable, is fit for service and no apparent threat of leakage exists. Deficiencies, if any, found during the inspection of the AST, including its associated equipment, leak detection system and secondary containment structure, if applicable, are described in the attached document(s) along with my recommendations and a schedule for abating said deficiencies.

  
 \_\_\_\_\_  
 \*Signature of Certifying Individual

12/01/2014  
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 Date Signed

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06/30/2015  
 \_\_\_\_\_  
 Registration/Certification Expiration Date  
 (if applicable)

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**See back page for noted deficiencies and recommendations.**

\*Please refer to Interpretive Rule §47-62-3 to determine who must certify your tank.

### AST Recommendations & Containment Conditions

The AST Act requires that aboveground storage tank maintenance work shall commence within six months from the date a permit (if necessary) is issued and must be completed within one year of commencement. Although permits are not necessary for the ASTs associated with this project, for the purposes of the Engineer's Certification, we are proposing to meet this schedule. As such, maintenance work, including any required additional evaluation efforts, for the items which are noted on the Fit for Service Form, shall be completed no later than June 30, 2016.

|                          |                                                          |
|--------------------------|----------------------------------------------------------|
| <b>AST Facility Name</b> | <b>ARP Mountaineer Production, LLC<br/>Lasher LITB-2</b> |
|--------------------------|----------------------------------------------------------|

#### Deficiencies and Recommendations:

- Continue periodic visual inspections of tank and associated systems for leak detection.
- Signage needs installed (NFPA label or standard WVDEP required signage)
- Elevate tank to reduce corrosion potential and facilitate leak detection and future inspections
- Security issues need addressed, as appropriate, to minimize potential unauthorized release (e.g., remove handles from valves, install plugs in lines, install lock on tank valves, fence area around tank, or other security measures)
- Stairway repair needed
- Install piping support
- Repair heat tracing and insulation on associated piping systems
- Cracks or holes noted in containment - repair noted areas
- Drain associated with containment has no valve (containment has some type of opening that can't be closed) or is left open
- Stability of dike questionable - ensure dike stability
- Cannot be determined if containment is sufficiently impervious – complete evaluation of permeability of containment area and upgrade as needed, in conformance with developing regulatory guidance

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**INTERIM ANNUAL INSPECTION CERTIFICATION**  
**Aboveground Storage Tank**  
 (tank, associated equipment, leak detection system and secondary containment structure, if applicable)  
**is Fit for Service**

|                                                 |                                                                                               |
|-------------------------------------------------|-----------------------------------------------------------------------------------------------|
| <b>AST Facility Name</b>                        | <b>Lasher LITB-3</b>                                                                          |
| Address                                         | RIDC Park West, Park Place Corporate Center One<br>1000 Commerce Drive, 4 <sup>th</sup> Floor |
| City, State, Zip                                | Pittsburgh, PA 15275                                                                          |
| <b>Tank Owner Name</b>                          | <b>ARP Mountaineer Production, LLC</b>                                                        |
| Telephone Number                                | 724-301-9089                                                                                  |
| Email Address                                   | KElkin@atlasenergy.com                                                                        |
| <b>Certifying Individual</b>                    | Amy L. Veltri, P.E.                                                                           |
| Address                                         | 171 Montour Run Road                                                                          |
| City, State, Zip                                | Moon Township, PA 15108                                                                       |
| Telephone Number                                | 412-719-6300                                                                                  |
| Email Address                                   | aveltri@ngeconsulting.com                                                                     |
| <b>Facility's/Owner's Tank ID #</b>             | <b>LITB-3</b>                                                                                 |
| <b>DEP Tank Registration Number (if issued)</b> | <b>055-00000981</b>                                                                           |

I certify that I have personally examined and/or am familiar with the inspection performed on the AST listed above, including its associated equipment, leak detection system and secondary containment structure, if applicable, and that I am a person eligible to perform such inspection pursuant to W.Va. Code § 22-30-6 and/or 47 CSR 62-3. As no minimum standards have been adopted by the Act or by legislative rule as of the date of this certification, I certify pursuant to W.Va. Code § 22-30-6(a), based on my direct knowledge and/or my inquiry of those individuals immediately responsible for obtaining the information, that the AST listed above, including its associated equipment, leak detection system and secondary containment structure, if applicable, is fit for service and no apparent threat of leakage exists. Deficiencies, if any, found during the inspection of the AST, including its associated equipment, leak detection system and secondary containment structure, if applicable, are described in the attached document(s) along with my recommendations and a schedule for abating said deficiencies.

  
 \_\_\_\_\_  
 \*Signature of Certifying Individual

12/01/2014  
 \_\_\_\_\_  
 Date Signed

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06/30/2015  
 \_\_\_\_\_  
 Registration/Certification Expiration Date  
 (if applicable)

**See back page for noted deficiencies and recommendations.**

\*Please refer to Interpretive Rule §47-62-3 to determine who must certify your tank.

### AST Recommendations & Containment Conditions

The AST Act requires that aboveground storage tank maintenance work shall commence within six months from the date a permit (if necessary) is issued and must be completed within one year of commencement. Although permits are not necessary for the ASTs associated with this project, for the purposes of the Engineer's Certification, we are proposing to meet this schedule. As such, maintenance work, including any required additional evaluation efforts, for the items which are noted on the Fit for Service Form, shall be completed no later than June 30, 2016.

|                          |                                                          |
|--------------------------|----------------------------------------------------------|
| <b>AST Facility Name</b> | <b>ARP Mountaineer Production, LLC<br/>Lasher LITB-3</b> |
|--------------------------|----------------------------------------------------------|

#### Deficiencies and Recommendations:

- Continue periodic visual inspections of tank and associated systems for leak detection.
- Signage needs installed (NFPA label or standard WVDEP required signage)
- Elevate tank to reduce corrosion potential and facilitate leak detection and future inspections
- Security issues need addressed, as appropriate, to minimize potential unauthorized release (e.g., remove handles from valves, install plugs in lines, install lock on tank valves, fence area around tank, or other security measures)
- Stairway repair needed
- Install piping support
- Repair heat tracing and insulation on associated piping systems
- Cracks or holes noted in containment - repair noted areas
- Drain associated with containment has no valve (containment has some type of opening that can't be closed) or is left open
- Stability of dike questionable - ensure dike stability
- Cannot be determined if containment is sufficiently impervious – complete evaluation of permeability of containment area and upgrade as needed, in conformance with developing regulatory guidance

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**INTERIM ANNUAL INSPECTION CERTIFICATION**  
**Aboveground Storage Tank**  
 (tank, associated equipment, leak detection system and secondary containment structure, if applicable)  
**Is Fit for Service**

|                                                 |                                                                                               |
|-------------------------------------------------|-----------------------------------------------------------------------------------------------|
| <b>AST Facility Name</b>                        | Lasher LITB-4                                                                                 |
| <b>Address</b>                                  | RIDC Park West, Park Place Corporate Center One<br>1000 Commerce Drive, 4 <sup>th</sup> Floor |
| <b>City, State, Zip</b>                         | Pittsburgh, PA 15275                                                                          |
| <b>Tank Owner Name</b>                          | ARP Mountaineer Production, LLC                                                               |
| <b>Telephone Number</b>                         | 724-301-9089                                                                                  |
| <b>Email Address</b>                            | KElkin@atlasenergy.com                                                                        |
| <b>Certifying Individual</b>                    | Amy L. Veltri, P.E.                                                                           |
| <b>Address</b>                                  | 171 Montour Run Road                                                                          |
| <b>City, State, Zip</b>                         | Moon Township, PA 15108                                                                       |
| <b>Telephone Number</b>                         | 412-719-6300                                                                                  |
| <b>Email Address</b>                            | aveltri@ngeconsulting.com                                                                     |
| <b>Facility's/Owner's Tank ID #</b>             | LITB-4                                                                                        |
| <b>DEP Tank Registration Number (if issued)</b> | 055-00000984                                                                                  |

I certify that I have personally examined and/or am familiar with the inspection performed on the AST listed above, including its associated equipment, leak detection system and secondary containment structure, if applicable, and that I am a person eligible to perform such inspection pursuant to W.Va. Code § 22-30-6 and/or 47 CSR 62-3. As no minimum standards have been adopted by the Act or by legislative rule as of the date of this certification, I certify pursuant to W.Va. Code § 22-30-6(a), based on my direct knowledge and/or my inquiry of those individuals immediately responsible for obtaining the information, that the AST listed above, including its associated equipment, leak detection system and secondary containment structure, if applicable, is fit for service and no apparent threat of leakage exists. Deficiencies, if any, found during the inspection of the AST, including its associated equipment, leak detection system and secondary containment structure, if applicable, are described in the attached document(s) along with my recommendations and a schedule for abating said deficiencies.

  
 \_\_\_\_\_  
 \*Signature of Certifying Individual

12/01/2014  
 \_\_\_\_\_  
 Date Signed

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WV PE#14241  
 \_\_\_\_\_  
 P.E. Registration #, STI Certification # or  
 API Certification # (if applicable)

06/30/2015  
 \_\_\_\_\_  
 Registration/Certification Expiration Date  
 (if applicable)

**See back page for noted deficiencies and recommendations.**

\*Please refer to Interpretive Rule §47-62-3 to determine who must certify your tank.

### AST Recommendations & Containment Conditions

The AST Act requires that aboveground storage tank maintenance work shall commence within six months from the date a permit (if necessary) is issued and must be completed within one year of commencement. Although permits are not necessary for the ASTs associated with this project, for the purposes of the Engineer's Certification, we are proposing to meet this schedule. As such, maintenance work, including any required additional evaluation efforts, for the items which are noted on the Fit for Service Form, shall be completed no later than June 30, 2016.

|                          |                                                          |
|--------------------------|----------------------------------------------------------|
| <b>AST Facility Name</b> | <b>ARP Mountaineer Production, LLC<br/>Lasher LITB-4</b> |
|--------------------------|----------------------------------------------------------|

#### Deficiencies and Recommendations:

- Continue periodic visual inspections of tank and associated systems for leak detection.
- Signage needs installed (NFPA label or standard WVDEP required signage)
- Elevate tank to reduce corrosion potential and facilitate leak detection and future inspections
- Security issues need addressed, as appropriate, to minimize potential unauthorized release (e.g., remove handles from valves, install plugs in lines, install lock on tank valves, fence area around tank, or other security measures)
- Stairway repair needed
- Install piping support
- Repair heat tracing and insulation on associated piping systems
- Cracks or holes noted in containment - repair noted areas
- Drain associated with containment has no valve (containment has some type of opening that can't be closed) or is left open
- Stability of dike questionable - ensure dike stability
- Cannot be determined if containment is sufficiently impervious – complete evaluation of permeability of containment area and upgrade as needed, in conformance with developing regulatory guidance

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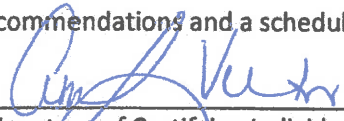
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**INTERIM ANNUAL INSPECTION CERTIFICATION**  
**Aboveground Storage Tank**  
 (tank, associated equipment, leak detection system and secondary containment structure, if applicable)  
**Is Fit for Service**

|                                                 |                                                                                               |
|-------------------------------------------------|-----------------------------------------------------------------------------------------------|
| <b>AST Facility Name</b>                        | <b>Lasher LITB-5</b>                                                                          |
| Address                                         | RIDC Park West, Park Place Corporate Center One<br>1000 Commerce Drive, 4 <sup>th</sup> Floor |
| City, State, Zip                                | Pittsburgh, PA 15275                                                                          |
| <b>Tank Owner Name</b>                          | <b>ARP Mountaineer Production, LLC</b>                                                        |
| Telephone Number                                | 724-301-9089                                                                                  |
| Email Address                                   | KELkin@atlasenergy.com                                                                        |
| <b>Certifying Individual</b>                    | <b>Amy L. Veltri, P.E.</b>                                                                    |
| Address                                         | 171 Montour Run Road                                                                          |
| City, State, Zip                                | Moon Township, PA 15108                                                                       |
| Telephone Number                                | 412-719-6300                                                                                  |
| Email Address                                   | aveltri@ngeconsulting.com                                                                     |
| <b>Facility's/Owner's Tank ID #</b>             | <b>LITB-5</b>                                                                                 |
| <b>DEP Tank Registration Number (if issued)</b> | <b>055-00000980</b>                                                                           |

I certify that I have personally examined and/or am familiar with the inspection performed on the AST listed above, including its associated equipment, leak detection system and secondary containment structure, if applicable, and that I am a person eligible to perform such inspection pursuant to W.Va. Code § 22-30-6 and/or 47 CSR 62-3. As no minimum standards have been adopted by the Act or by legislative rule as of the date of this certification, I certify pursuant to W.Va. Code § 22-30-6(a), based on my direct knowledge and/or my inquiry of those individuals immediately responsible for obtaining the information, that the AST listed above, including its associated equipment, leak detection system and secondary containment structure, if applicable, is fit for service and no apparent threat of leakage exists. Deficiencies, if any, found during the inspection of the AST, including its associated equipment, leak detection system and secondary containment structure, if applicable, are described in the attached document(s) along with my recommendations and a schedule for abating said deficiencies.

  
 \_\_\_\_\_  
 \*Signature of Certifying Individual

12/01/2014  
 \_\_\_\_\_  
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 API Certification # (if applicable)

06/30/2015  
 \_\_\_\_\_  
 Registration/Certification Expiration Date  
 (if applicable)

**See back page for noted deficiencies and recommendations.**

\*Please refer to Interpretive Rule §47-62-3 to determine who must certify your tank.

### AST Recommendations & Containment Conditions

The AST Act requires that aboveground storage tank maintenance work shall commence within six months from the date a permit (if necessary) is issued and must be completed within one year of commencement. Although permits are not necessary for the ASTs associated with this project, for the purposes of the Engineer's Certification, we are proposing to meet this schedule. As such, maintenance work, including any required additional evaluation efforts, for the items which are noted on the Fit for Service Form, shall be completed no later than June 30, 2016.

|                          |                                                          |
|--------------------------|----------------------------------------------------------|
| <b>AST Facility Name</b> | <b>ARP Mountaineer Production, LLC<br/>Lasher LITB-5</b> |
|--------------------------|----------------------------------------------------------|

#### Deficiencies and Recommendations:

- Continue periodic visual inspections of tank and associated systems for leak detection.
- Signage needs installed (NFPA label or standard WVDEP required signage)
- Elevate tank to reduce corrosion potential and facilitate leak detection and future inspections
- Security issues need addressed, as appropriate, to minimize potential unauthorized release (e.g., remove handles from valves, install plugs in lines, install lock on tank valves, fence area around tank, or other security measures)
- Tank needs to be re-painted (spot corrosion removal and repaint or sandblast tank and repaint)
- Paint tank nozzle weld
- Stairway repair needed
- Install piping support
- Repair heat tracing and insulation on associated piping systems
- Cracks or holes noted in containment - repair noted areas
- Drain associated with containment has no valve (containment has some type of opening that can't be closed) or is left open
- Stability of dike questionable - ensure dike stability
- Cannot be determined if containment is sufficiently impervious – complete evaluation of permeability of containment area and upgrade as needed, in conformance with developing regulatory guidance

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**INTERIM ANNUAL INSPECTION CERTIFICATION**  
**Aboveground Storage Tank**  
 (tank, associated equipment, leak detection system and secondary containment structure, if applicable)  
**Is Fit for Service**

|                                                 |                                                                                               |
|-------------------------------------------------|-----------------------------------------------------------------------------------------------|
| <b>AST Facility Name</b>                        | <b>Lasher LITB-6</b>                                                                          |
| Address                                         | RIDC Park West, Park Place Corporate Center One<br>1000 Commerce Drive, 4 <sup>th</sup> Floor |
| City, State, Zip                                | Pittsburgh, PA 15275                                                                          |
| <b>Tank Owner Name</b>                          | <b>ARP Mountaineer Production, LLC</b>                                                        |
| Telephone Number                                | 724-301-9089                                                                                  |
| Email Address                                   | KElkin@atlasenergy.com                                                                        |
| <b>Certifying Individual</b>                    | Amy L. Veltri, P.E.                                                                           |
| Address                                         | 171 Montour Run Road                                                                          |
| City, State, Zip                                | Moon Township, PA 15108                                                                       |
| Telephone Number                                | 412-719-6300                                                                                  |
| Email Address                                   | aveltri@ngeconsulting.com                                                                     |
| <b>Facility's/Owner's Tank ID #</b>             | <b>LITB-6</b>                                                                                 |
| <b>DEP Tank Registration Number (if issued)</b> | <b>055-00000982</b>                                                                           |

I certify that I have personally examined and/or am familiar with the inspection performed on the AST listed above, including its associated equipment, leak detection system and secondary containment structure, if applicable, and that I am a person eligible to perform such inspection pursuant to W.Va. Code § 22-30-6 and/or 47 CSR 62-3. As no minimum standards have been adopted by the Act or by legislative rule as of the date of this certification, I certify pursuant to W.Va. Code § 22-30-6(a), based on my direct knowledge and/or my inquiry of those individuals immediately responsible for obtaining the information, that the AST listed above, including its associated equipment, leak detection system and secondary containment structure, if applicable, is fit for service and no apparent threat of leakage exists. Deficiencies, if any, found during the inspection of the AST, including its associated equipment, leak detection system and secondary containment structure, if applicable, are described in the attached document(s) along with my recommendations and a schedule for abating said deficiencies.

  
 \_\_\_\_\_  
 \*Signature of Certifying Individual

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 (if applicable)

**See back page for noted deficiencies and recommendations.**

\*Please refer to Interpretive Rule §47-62-3 to determine who must certify your tank.

### AST Recommendations & Containment Conditions

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|                          |                                                          |
|--------------------------|----------------------------------------------------------|
| <b>AST Facility Name</b> | <b>ARP Mountaineer Production, LLC<br/>Lasher LITB-6</b> |
|--------------------------|----------------------------------------------------------|

#### Deficiencies and Recommendations:

- Continue periodic visual inspections of tank and associated systems for leak detection.
- Signage needs installed (NFPA label or standard WVDEP required signage)
- Elevate tank to reduce corrosion potential and facilitate leak detection and future inspections
- Security issues need addressed, as appropriate, to minimize potential unauthorized release (e.g., remove handles from valves, install plugs in lines, install lock on tank valves, fence area around tank, or other security measures)
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**INTERIM ANNUAL INSPECTION CERTIFICATION**  
**Aboveground Storage Tank**  
 (tank, associated equipment, leak detection system and secondary containment structure, if applicable)  
**Is Fit for Service**

|                                                 |                                                                                               |
|-------------------------------------------------|-----------------------------------------------------------------------------------------------|
| <b>AST Facility Name</b>                        | <b>Lasher LITB-7</b>                                                                          |
| Address                                         | RIDC Park West, Park Place Corporate Center One<br>1000 Commerce Drive, 4 <sup>th</sup> Floor |
| City, State, Zip                                | Pittsburgh, PA 15275                                                                          |
| <b>Tank Owner Name</b>                          | <b>ARP Mountaineer Production, LLC</b>                                                        |
| Telephone Number                                | 724-301-9089                                                                                  |
| Email Address                                   | KElkin@atlasenergy.com                                                                        |
| <b>Certifying Individual</b>                    | Amy L. Veltri, P.E.                                                                           |
| Address                                         | 171 Montour Run Road                                                                          |
| City, State, Zip                                | Moon Township, PA 15108                                                                       |
| Telephone Number                                | 412-719-6300                                                                                  |
| Email Address                                   | aveltri@ngeconsulting.com                                                                     |
| <b>Facility's/Owner's Tank ID #</b>             | <b>LITB-7</b>                                                                                 |
| <b>DEP Tank Registration Number (if issued)</b> | <b>055-00000983</b>                                                                           |

I certify that I have personally examined and/or am familiar with the inspection performed on the AST listed above, including its associated equipment, leak detection system and secondary containment structure, if applicable, and that I am a person eligible to perform such inspection pursuant to W.Va. Code § 22-30-6 and/or 47 CSR 62-3. As no minimum standards have been adopted by the Act or by legislative rule as of the date of this certification, I certify pursuant to W.Va. Code § 22-30-6(a), based on my direct knowledge and/or my inquiry of those individuals immediately responsible for obtaining the information, that the AST listed above, including its associated equipment, leak detection system and secondary containment structure, if applicable, is fit for service and no apparent threat of leakage exists. Deficiencies, if any, found during the inspection of the AST, including its associated equipment, leak detection system and secondary containment structure, if applicable, are described in the attached document(s) along with my recommendations and a schedule for abating said deficiencies.



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|                          |                                                          |
|--------------------------|----------------------------------------------------------|
| <b>AST Facility Name</b> | <b>ARP Mountaineer Production, LLC<br/>Lasher LITB-7</b> |
|--------------------------|----------------------------------------------------------|

#### Deficiencies and Recommendations:

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- Signage needs installed (NFPA label or standard WVDEP required signage)
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