



May 7, 2025

**VIA E-MAIL** (kerry.adkins@dnr.ohio.gov)

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Division of Oil & Gas Resources Management  
2045 Morse Road  
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**RE: Ohio Oil and Gas Association Comments on ODNR Proposed Safety Rule Amendments (OAC 1501:9-09) Division of Oil and Gas Resources Management (DOGRM)**

Dear Mr. Adkins:

On December 23, 2024 and February 10, 2025, the Ohio Oil & Gas Association submitted comments on the Division's proposed amendments to the rules governing Safety Regulations found in (OAC 1501:9-09).

Prior to the Division's interested party meeting on May 12, 2025, the Association would like to provide additional suggestions for language on the SIMOPS portion of the proposed safety rule for the Division to review. We are hopeful that these comments can be the starting point for discussions on Monday.

**1501:9-9-01- Definitions**

- In section (E)(1) and (2), there is no scientific basis to add a 20% safety factor or any safety factor to the fall radius, so we recommend striking "...~~multiply by a safety factor of 1.2...~~" within section (E)(1) and (2).
- In section (G), we recommend adding the following language after the proposed language. "This is limited to workover rigs, including stand-alone and rig assist units, drilling rigs, and cranes. Telehandlers, single mast units, slickline units, and trackhoes are specifically excluded."
  - The Agency's proposed language is too broad. It is impractical to go through the existing SIMOPS protocol for slickline operations or minor repairs, such as replacing a wellhead ESD using a telehandler. The draft definition could complicate many routine operations.



- In section (H), we propose adding the following language at the end of the definition, "...Conductor installation using a trackhoe-based apparatus is specifically excluded."
  - Conductor installation has a significantly lower risk profile and should be excluded from the definition.
- In section (L) we suggest implementing the language in green: "Simultaneous operation(s)" means any overhead operations where above grade well or wells not being constructed or accessed are located within the fall impact radius of overhead equipment used to construct or access a well or any equipment used to assemble or disassemble equipment that is used to construct or access a well. Any below grade wells must have cover plates installed during overhead operations."
  - This additional language could allow for underground cellar operations in the future as an accepted method for SIMOPs.
- In section (Q), we suggest adding to the definition, "This definition shall only apply to wells that are capable of building a 24 hour shut in pressure that can not be overcome with a full column of produced fluid. For this calculation, a safety factor of 1.25 shall be multiplied by the highest recorded shut-in pressure during the past year."
  - The intent of this added language is to exclude lower risk (lower pressure) wells from the SIMOPs process. This will save a significant amount of unnecessary work from both the operators and the ODNR.

#### **1501:9-9-09- Simultaneous Operations**

- In section (A), we suggest removing ~~"...and without first having received written acceptance of the plan."~~
  - We propose eliminating written acceptance if operator is not requesting variance from the existing rules. It does not seem practical to wait on approval to follow the rule and will reduce ODNR workload.
- In section (A)(1), we suggest the following word removal. "If an applicant proposes to produce wells ~~flow~~ located within the fall radius during overhead operations, the chief will not accept a simultaneous operations plan unless all of the following are included:"
- We suggest striking all of section (A)(1)(a).
  - This section is unnecessary if the remainder of the SIMOPs rules are followed – the wells are protected against the perceived risks. It also



becomes impractical in instances where capillary strings are installed in offset wells or where offsetting wells easily load up.

- In section (A)(1)(b), we suggest striking “~~and-secured~~” from this section because it is not necessary to secure the cages.
- We suggest adding the following language after (A)(1):
  - (1) If an applicant proposes to produce wells located within the fall radius during overhead operations while working on producing wells that are excluded from the workover definition, the applicant shall do the following:
    - (a) Notify the ODNR at least 48 hours before any overhead operations commence.
    - (b) Be able to produce records detailing the highest shut in pressure recorded within the past year.
    - (c) Maintain enough produced water on location to establish a fluid column with a hydrostatic pressure higher than 125% of the shut in pressure.
    - (d) Connect all wells within the fall radius to the supply of produced water with a pump and kill lines.
  - The intent of this additional section is to allow for SIMOPs on low pressure / low risk workovers without needing to take all of the same steps that would be necessary for a drilling or completing operation. Existing rules will become overly burdensome to both operators and ODNR as workover activity increases.
- In section (A)(2)(c) we suggest striking “~~and-secured~~”
- In section (A)(3)(b) we suggest striking the typo “~~four~~”
- In section (B)(2) we suggest the following changes to the proposed language: Upon receipt, the chief will review any requested variances to the simultaneous operations plan and either accept or reject the proposed plan in writing within thirty ~~thirty~~ twenty-one business days. ~~Upon receipt of a simultaneous operations plan involving a workover, the chief will review the plan and either accept or reject the plan in writing within twenty business days.~~
  - We propose that the SIMOPs plan review time align with drilling permit review time.