



February 27, 2025

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

Kerry Adkins, Rules Coordinator
Ohio Department of Natural Resources
Division of Oil & Gas Resources Management
2045 Morse Road
Columbus, Ohio 43229

RE: Ohio Oil and Gas Association Comments on ODNR Proposed Referenced Industry Standards Rule Amendments (OAC 1501:9-12) and Proposed “No Change” filings for the Division of Oil and Gas Resources Management (DOGRM)

Dear Mr. Adkins:

On February 3, 2025, the Ohio Department of Natural Resources (ODNR) notified interested parties of the Division’s proposed amendments to the rules governing “Referenced Industry Standards” (Referenced Standards) found in OAC 1501:9-12 and proposed “no change” filings for several other rules.

The Ohio Oil and Gas Association is one of the largest and most active state-based oil and natural gas associations in the United States and has been the representative of Ohio’s oil and gas producing industry since 1947. OOGA’s members are involved in all aspects of the exploration, development, production and marketing of crude oil and natural gas resources in Ohio. The Association’s members often rely on OOGA as their primary source of information on industry trends, activities, tax changes, legislation and regulatory issues. OOGA frequently participates in federal and state regulatory actions affecting the oil and gas industry.

OOGA recommends the removal of section (A)(8) in 1501:9-12 which references the “RP 65-3 Wellbore Plugging and Abandonment, first edition, dated June 2021” standard. In the Division’s proposed well plugging rules, OOGA recommended the removal of 1501:9-1-03 (A)(4)(b) and (A)(5) because it is the Association’s belief that well plugging regulations must be tailored to Ohio’s unique geology and based on practical application of plugging wells in this state. Since 1501:9-1-03 (A)(4)(b) and (A)(5) were not removed from the amended proposed well plugging rules, OOGA does not support the addition of RP 65-3 as an industry standard until there is agreement on this item.

As the rulemaking process continues, OOGA may provide additional feedback on the proposed Referenced Industry Standard rules based on stakeholder input. OOGA



appreciates the opportunity to comment on the proposed rules and we look forward to continuing to work with the Division in this rulemaking effort.

Sincerely,

A handwritten signature in black ink that reads "Stephanie Kromer". The script is fluid and cursive.

Stephanie Kromer

Director of Legislative & Regulatory Affairs