

My name is Marlene Blatnik-Freeze and I live in Shaker Hts., Ohio. Senate Bill 219 would greatly speed up every stage of the process to frack our state parks and public lands, and allow fracking *inside* our state parks. I oppose this bill because:

- It would curtail the ability of ODNR to regulate injection wells and orphan wells.
- It would make road use maintenance agreements with local governments voluntary and allow fracking companies to put overweight trucks on rural roads.
- Prohibiting ODNR from charging an oil and gas company anything beyond what is specifically authorized in the lease. This means the state potentially could not levy fines on companies that do not follow the rules or make companies pay to clean up after a spill, leak, explosion, or accident.
- Allowing an oil and gas company “surface use” of state land – meaning they can frack *IN* our parks and public lands. Currently the DeWine administration requires no surface use, meaning frack wells must be located outside state parks and wildlife areas.
- Allowing an oil and gas company to retain surface use of public land even if they temporarily shut down a well due to market conditions (the shut-in royalty provision)
- Giving an oil and gas company that has a lease to frack public lands up to 60 days to pay any advance royalties or bonuses, instead of 10 days under existing law.
- Suspending the time limit on oil and gas leases to frack public land if the land has to go through a federal approval process. Such a process applies to Zepernick and Leesville wildlife areas. Currently these processes are counted against the time limits on leases to frack public land.
- Allowing oil and gas companies that are fracking public land to defer all payments to the state if litigation of any kind is filed, until a final non-appealable order is issued by a court. This means the case would have to go through months if not years of litigation in multiple courts before the company had to start paying the royalties and bonuses promised to the state.

Curtailing the ability of ODNR’s Division of Oil and Gas Resources Management (DOGRM) to regulate oil and gas wells in Ohio

Removing DOGRM's authority to issue an adjudication order under the Ohio Administrative Procedure Act. Without the ability to conduct adjudication hearings,

- ODNR cannot determine the facts and enforce state laws and administrative rules.
- Revoking DOGRM's authority to deny requests for expedited review of permit applications for production wells or to cap orphan wells. If an oil and gas company requests expedited review, DOGRM would have to do it up to 10 permits per year.
- Prohibiting DOGRM from requiring a well owner to stop or limit production from one well if they engage in simultaneous operations of other wells on the same well pad.

Requiring ODNR to prioritize plugging orphan wells located near injection wells, instead of plugging orphan wells based on how dangerous or polluting they are.

- Relieving the owner of a well from obligations and liabilities upon transfer of the well if the owner files required information with the DOGRM, instead of maintaining those obligations and liabilities until the transferee takes control of the well.

Road use maintenance agreements (RUMAs) with local governments

- Eliminating the requirement that a horizontal well permit applicant enter into road maintenance agreements with local governments, instead making these voluntary agreements that would expire after three years.

Exempting the requirement for a fracking well permit holder to obtain a special regional heavy hauling permit if the load size or weight exceeds legal limits

If this bill passes it's nothing but a gift for out of state and foreign gas companies and turns Ohio into nothing but a sacrifice zone.

I oppose SB 219.