

Chairman Blasdel, Vice Chair Fischer, Ranking Member Rogers, and members of the Ohio House Natural Resources Committee, Thank you for allowing me to testify today. My name is William C. Lowers. I am a 77 year old US Naval Vietnam veteran and I run a small product safety consulting business in a semi-retired status. I hold associate and bachelor's degrees in Public Administration from Franklin University here in Columbus and have done graduate work in City and Regional Planning at Ohio State. I am strongly opposed to Bill Number S.B. 219 for the following reasons:

As I just became aware of this legislation about one week ago, I did not have enough time to fully research this vast and wide-ranging bill. It covers a lot of highly detailed and complex information related to oil and gas drilling law that has been developed over a very long time, and I simply don't have the tools to either support or oppose much of what is in this bill. Thus, my primary concern is Orphan Wells, or old wells that either don't produce salable quantities of oil or gas, or wells that have broken down and have been abandoned, and not properly taken out of service by a process known as capping. These orphaned wells have been known to pollute the air, soil, surface and ground water for as long as 100 years, frequently leaking methane into the atmosphere, which, as we all know is a potent greenhouse gas.

The first oil and gas wells were drilled in Ohio in 1886, and since the first well was drilled in Ohio, more than 270,000 wells have been drilled in Ohio. From my own reading and research, I believe it is fair to say that as much as 1/3 of all wells drilled in America, Canada and around the world can fit into the category of an orphaned well. I have also read reports that indicate that a newly fractured well can leak gas into already orphaned wells, making the problem of released methane into our atmosphere worse. We know that in America, 120,000 orphaned wells have been documented, and in Ohio, we have at least 20,000. So it's a problem.

One report I have read indicates that between now and 2035, only 9 years from now, we expect to spend over \$600 Million to cap orphaned wells in Ohio, so I can't say we aren't doing anything about it, because we are, and over half a billion dollars is a lot of money.

Maybe some of our legislative effort should be directed to preventing the orphaning of wells, and some of the provisions I have seen in this bill make a lot of sense, like requiring financial responsibility if a well changes hands, or at the outset, prior to drilling of a well.

I would like this or other legislation to be directed to more prevention activities, and maybe we can spend some time requiring, in law, that state-of-the-art drilling standards be used from the start in drilling our wells. The American Petroleum Institute has, for many years, developed consensus standards that cover safe drilling practices, including safe drilling practices for the fracking business. Four I have located that are relevant are the following:

- [API RP 100-1](#): Addresses well integrity and fracture containment.
- [API RP 100-2](#): Focuses on environmental aspects of exploration and production.
- [API Std 16FI \(2026\)](#): New standard for "frac iron" (high-pressure piping and hoses).

- [API RP 54](#): Occupational safety for oil/gas well servicing.

American Petroleum Institute | API +2

These standards are also developed as a means of risk management for the resource extraction business, and much of the effort is to prevent environmental problems at the wellhead, in transportation and prevention of worker injuries and accident prevention. Just because the API does lobbying, they are not generally evil people, and I know some of them professionally. The API is not necessarily the only organization who develops these kind of standards, but they are the only one I am aware of, but I have not extensively researched either.

Thank you, I will answer any questions you may have.