

The public is hidden from what is supposed to be a transparent process: this Sub bill is proposing to go from 90 to 60 days to make a decision on accepting a bid, when the public has only a short 45 days to file comments, that is after the OGLMC posts the nomination. Understanding is impeded by the absence of any discussion (per the nine-point state guideline) and by the practice of denying any and all spoken comment from concerned citizens at OGLMC meetings. Next, just 30 days to execute leases would not give Save Ohio Parks and the citizens time to be sure stipulations (addendums) are in executed leases.

Gov. De Wine has vetoed many points in this Sub-SB 219 bill. Most glaring is the language preventing ODNR from charging companies for anything not in the lease, e.g. a big spill. Two of your committee members brought up the idea of “Make Polluters Pay” during the third hearing. Then, there is a 30-day lease award deadline. Next, having been vetoed, is the language that allows companies to negotiate SURFACE USE OF STATE LAND – an abhorrent idea - parks are for the purpose of relaxing in a natural state. In addition, the Sub bill contains language allowing oil and gas companies to retain surface use if they’ve temporarily shut down a well; this unnecessarily prolongs the pollution and disturbances which citizens and residents object to. First vetoed and now opposed is the provision in this Sub bill allowing up to 60 days to pay any advance royalty or bonuses (now the law is 10 days). This Sub bill proposes the right to suspend any payments to the state if any litigation is filed until a non-appealable decision is made by the court; this could be extremely dangerous to citizens in the case of a spill, explosion or accident. Indeed, this Sub bill allows carrying on business – leasing without paying while the HB 507 suits sit idly.

Deplorable is this Sub bill provision to strip the DOGRM of their power to adjudicate: stopping them from refusing to expedite permits as well as from prohibiting well owners from stopping or limiting production of one of multiple wells on the same pad.

I object to stripping the requirement for road use maintenance agreements with local governments, and the limiting of heavy load hauling permits for horizontal wells. Why, since lease terms increased from three to five years, should heavy load hauling permit requirements for truck traffic cease after only three years? I believe John Olivieri’s comment that the destruction/deterioration on roads not built for heavy equipment lasts beyond the three-year Sub bill 219 limit. Finally, I oppose the provision that well owners be

relieved from liability and obligations from transfer of a well, as the new owner may decide to let them default to the state.