

290 W. Nationwide Blvd.  
Columbus, Ohio 43215

Direct: 614-460-6988  
Fax: 614.460.8403  
josephclark@nisource.com



July 11, 2017

Ms. Barcy F. McNeal  
Director, Office of Administration  
Ohio Power Siting Board  
180 East Broad Street, 11<sup>th</sup> Floor  
Columbus, Ohio 43215

**Re: OPSB Case No. 17-1557-GA-BNR**

*In the Matter of the Construction Notice Application by Columbia Gas of Ohio, Inc. for a Certificate of Environmental Compatibility and Public Need for the I-75 Mandatory Relocation Project.*

Dear Ms. McNeal:

Columbia Gas of Ohio, Inc. ("Columbia") submits this Construction Notice, pursuant to Ohio Admin. Code 4906-6-03(C) and 4906-6-05, concerning a proposed pipeline relocation known as the I-75 Mandatory Relocation Project (the "Project"). The Project involves the relocation and installation of 1,230 feet of 12-inch, coated steel pipeline with a Maximum Allowable Operating Pressure ("MAOP") of 145 psig. Therefore, as required by Ohio Admin. Code 4906-6-05, please be advised of the following:

**(1) The name of the project and applicant's reference number, names and reference number(s) of resulting circuits and a brief description of the project, and why the project meets the requirements for a construction notice.**

The Project is identified as the I-75 Mandatory Relocation Project, which has been classified by the Ohio Department of Transportation ("ODOT") as WOO/LUC-75-30.70/0.00. This project is a mandatory relocation and installation of approximately 1,230 feet of 12-inch coated steel main. Columbia will be retiring 1,113 feet of 12-inch pipeline, relocating the pipeline, and replacing it with 1,230 feet of 12-inch, coated steel main with an MAOP of 145 psig. Columbia must relocate this portion of high pressure main due to ODOT re-aligning I-75, located within Northwood, Ohio, in Wood County. Columbia

will be open cutting within the easement and crossing I-75 by method of a bore 542 feet in length. The location of the Project is shown on **Appendix A** and a copy of Columbia's Inadvertent Release Plans is attached as **Appendix B**.

The Project meets the requirements of a Construction Notice as it is a pipeline replacement project less than one mile in length as well as a "Replacement or relocation of gas pipeline facilities where the project is required by publicly funded entities and is located on or adjacent to new right-of-way owned by the public entity requiring the project." See Appendix B of Rule 4906-1-01 Ohio Admin. Code.

**(2) If the proposed construction notice project is an electric power transmission line or gas pipeline, a statement explaining the need for the proposed facility.**

Columbia currently uses the 12-inch, high-pressure line to distribute gas throughout northern Wood County as well as Lucas County. As explained above, ODOT is requiring Columbia to relocate a portion of this pipeline due to the planned realignment of I-75. The new road alignment will cause an engineering and operational conflict with Columbia's existing facilities, which has prompted Columbia to relocate its line.

**(3) The location of the project in relation to existing or proposed lines and substations shown on an area system map of sufficient scale and size to show existing and proposed transmission facilities in the project area.**

A map showing the location and proposed work of the Project is attached as **Appendix A**.

**(4) The alternatives considered and reasons why the proposed location or route is best suited for the proposed facility. The discussion shall include, but not be limited to, impacts associated with socioeconomic, ecological, construction, or engineering aspects of the project.**

Columbia did not consider any alternative routes for the Project due to the relocation of the pipeline, within the limited access public right-of-way and Columbia-owned easement, both pre-construction and post-construction. The identified route in this Construction Notice relocates the pipeline to avoid the wetland present in the limited access public right-of-way and easement.

**(5) Describe the public information program to inform affected property owners and tenants of the nature of the project and the proposed timeframe for project construction and restoration activities.**

Columbia has not engaged in a formal public information program. In lieu of a formal public information program, ODOT has been educating the public about the I-75 project scope as necessary. Moreover, the relocation will not affect individual customer service, as replacing the mainline will not result in customers losing service.

**(6) The anticipated construction schedule and proposed in-service date of the project.**

Construction of the 12-inch pipeline relocation is planned to start on October 9, 2017, and the in-service date of the Project is expected to be on or about January 31, 2018.

**(7) An area map of not less than 1:24,000 scale clearly depicting the facility's centerline, with clearly marked streets, roads, and highways, and an aerial image.**

Please see the map attached as **Appendix A**.

**(8) A list of properties for which the applicant has obtained easements, options, and/or land use agreements necessary to construct and operate the facility and a list of the additional properties for which such agreements have not been obtained.**

ODOT is currently obtaining a 25-foot easement from Robert L. Hirzel & Alva Hirzel, Trustees, for a 688-foot portion of the project. The remaining 542 feet will be within existing private easement held by Columbia and limited access public right-of-way.

**(9) Technical features of the project.**

**(a) Operating characteristics, estimated number and types of structures required, and right-of-way and/or land requirements.**

The 1,230 feet of 12-inch, high-pressure main will have an MAOP of 145 psig. Though the pipeline has an MAOP of 145 psig, Columbia anticipates operating

this pipeline at 123 psig. With the pipeline relocation, Columbia needs additional permanent easement for the Project. As such ODOT is obtaining the necessary land rights as part of its project.

**(b) For electric power transmission lines that are within 100 feet of an occupied residence or institution, the production of electric and magnetic fields during the operation of the proposed electric power transmission line. The discussion shall include:**

- (i) Calculated electric and magnetic field strength levels at one meter above ground under the lowest conductors and at the edge of the right-of-way for: (a) Normal maximum loading, (b) Emergency line loading, (c) Winter normal conductor rating.**
- (ii) A discussion of the applicant's consideration of design alternatives with respect to electric and magnetic fields and their strength levels, including alternate conductor configuration and phasing, tower height, corridor location, and right-of-way width.**

Not applicable to this Project.

**(c) The estimated cost of the project.**

The estimated total cost of the Project is approximately \$744,150.

**(10) Social and Ecological Impacts of the Project.**

**(a) A brief, general description of the land use within the vicinity of the proposed project, including a list of municipalities, townships, and counties affected.**

The Project is located within the City of Northwood, Ohio, in new easement and limited access public right-of-way of I-75. The land use associated with the Project is not populated property in a municipality.

**(b) The acreage and general description of all agricultural land, and separately all agricultural district land, existing at least sixty days prior to submission of the application within the potential disturbance area of the project.**

The land associated with the Project area does not consist of populated property in a municipality. The Project is neither within an agricultural district, nor is there any other type of agricultural land within the Project area.

**(c) A description of the applicant's investigation concerning the presence or absence of significant archaeological or cultural resources that may be located within the area likely to be disturbed by the project, a statement of the findings of the investigation, and a copy of any document produced as a result of the investigation.**

The pipeline currently is and will be constructed solely within easement and limited access public right-of-way. Columbia anticipates that any archaeological or cultural resources would have been located and identified by the City of Northwood or ODOT.

**(d) A listing of the local, state, and federal government agencies known to have requirements that must be met in connection with the construction of the project, and a list of documents that have been or are being filed with those agencies in connection with siting and constructing the project.**

Columbia is obtaining a storm water permit from the Ohio EPA for this project. Aside from this permit, Columbia is not aware of any other required permits for Columbia to construct within the easement and limited access public right-of-way Northwood for the Project. While the necessity to obtain any permits is not anticipated, Columbia will obtain any required federal, state, or local permits for the Project.

A copy of the Construction Notice, as filed in Case No. 17-1557-GA-BNR, was sent to the following public officials on July 11, 2017, concurrently with submittal to OPSB. As the substantive content of the Construction Notice in this docket has not changed, concurrent with this filing, Columbia mailed to the following public officials a letter explaining the change in docket number.

## **Wood County**

Mr. Theodore Bowlus  
Wood County Board of  
Commissioners  
Fifth Floor, County Office Building  
One Courthouse Square  
Bowling Green, Ohio 43402

Mr. Craig LaHote  
County Administrator  
Wood County Board of  
Commissioners  
Fifth Floor, County Office Building  
One Courthouse Square  
Bowling Green, Ohio 43402

Mr. Wade Gottschalk  
Executive Director  
Wood County Economic  
Development Commission  
639 S. Dunbridge, Suite 2  
Bowling Green, Ohio 43402

Mr. Jeremy Gerwin  
District Technician  
Wood County Soil and Water  
Conservation District  
1616 East Wooster Street, Suite 17  
Bowling Green, Ohio 43402

Ms. Doris Herringshaw, Ed.D.  
President  
Wood County Board of Comm.  
Fifth Floor, County Office Building  
One Courthouse Square  
Bowling Green, Ohio 43402

Mr. John Musteric  
Wood County Engineer  
One Courthouse Square  
Bowling Green, Ohio 43402

Kelly O'Boyle  
Assistant County Administrator  
One Courthouse Square  
Bowling Green, Ohio 43402

Mr. Bernie Scott  
Chairman  
Wood County Soil and Water  
Conservation District  
1616 East Wooster Street, Suite 17  
Bowling Green, Ohio 43402

## **City of Northwood**

Hon. Edward Schimmel  
Mayor, City of Northwood  
6000 Wales Rd.  
Northwood Municipal Bldg.  
Northwood, Ohio 43619

Mr. Randy Kozina  
President, Northwood City  
Council  
6000 Wales Rd.  
Northwood Municipal Bldg.  
Northwood, Ohio 43619  
Ms. Connie Hughes  
Northwood City Council  
6000 Wales Rd.  
Northwood Municipal Bldg.  
Northwood, Ohio 43619

Mr. Daniel Mikolajczyk  
Northwood City Council  
6000 Wales Rd.  
Northwood Municipal Bldg.  
Northwood, Ohio 43619

Mr. Jim Burton  
Northwood City Council  
6000 Wales Rd.  
Northwood Municipal Bldg.  
Northwood, Ohio 43619

Mr. Bob Anderson  
City Administrator  
6000 Wales Rd.  
Northwood Municipal Bldg.  
Northwood, Ohio 43619

Mr. Dave Kuhn  
Northwood City Engineer  
6000 Wales Rd.  
Northwood Municipal Bldg.  
Northwood, Ohio 43619

Mr. Dean Edwards  
Northwood City Council  
6000 Wales Rd.  
Northwood Municipal Bldg.  
Northwood, Ohio 43619

Mr. Keith Dempsey  
Northwood City Council  
6000 Wales Rd.  
Northwood Municipal Bldg.  
Northwood, Ohio 43619

Mr. Louis Fahrbach  
Northwood City Council  
6000 Wales Rd.  
Northwood Municipal Bldg.  
Northwood, Ohio 43619

Ms. Connie Hughes  
Chairman  
Northwood Safety Committee  
6000 Wales Rd.  
Northwood Municipal Bldg.  
Northwood, Ohio 43619

Ms. Kimberly Vaculik  
Planning, Zoning & Economic  
Development Coordinator  
6000 Wales Rd.  
Northwood Municipal Bldg.  
Northwood, Ohio 43619

**(e) A description of the applicant's investigation concerning the presence or absence of federal and state designated species (including endangered species, threatened species, rare species, species proposed for listing, species under review for listing, and species of special interest) that may be located within the area likely to be disturbed by the project, a statement of findings of the investigation, and a copy of any document produced as a result of the investigation.**

The pipeline currently is and will be constructed solely within the limited access public right-of-way and easement. Columbia anticipates that any other federal and state designated species would have been identified in the Project area by the City of Northwood and/or ODOT.

**(f) A description of the applicant's investigation concerning the presence or absence of areas of ecological concern (including national and state parks, floodplains, wetlands, designated or proposed wildlife areas, national and state wild and scenic rivers, wildlife areas, wildlife refuges, wildlife management areas, and wildlife sanctuaries) that that may be located within the area likely to be disturbed by the project, a statement of findings of the investigation, and a copy of any document produced as a result of the investigation.**

The pipeline currently is and will be constructed solely within the limited access public right-of-way and easement. The identified route in this Construction Notice relocates the pipeline to avoid the wetland present in the limited access public right-of-way and easement. While floodplain and wetlands permits are not anticipated, Columbia will not obtain floodplain and wetland permits.

**(g) Any known additional information that will describe any unusual conditions resulting in significant environmental, social, health, or safety impacts.**

To the best of Columbia's knowledge, no unusual conditions exist that would result in significant environmental, social, health, or safety impacts.



Should Staff of the Ohio Power Siting Board desire further information or discussion of this application, please do not hesitate to reach out to me at the information listed above.

Respectfully submitted

*/s/ Joseph M. Clark*



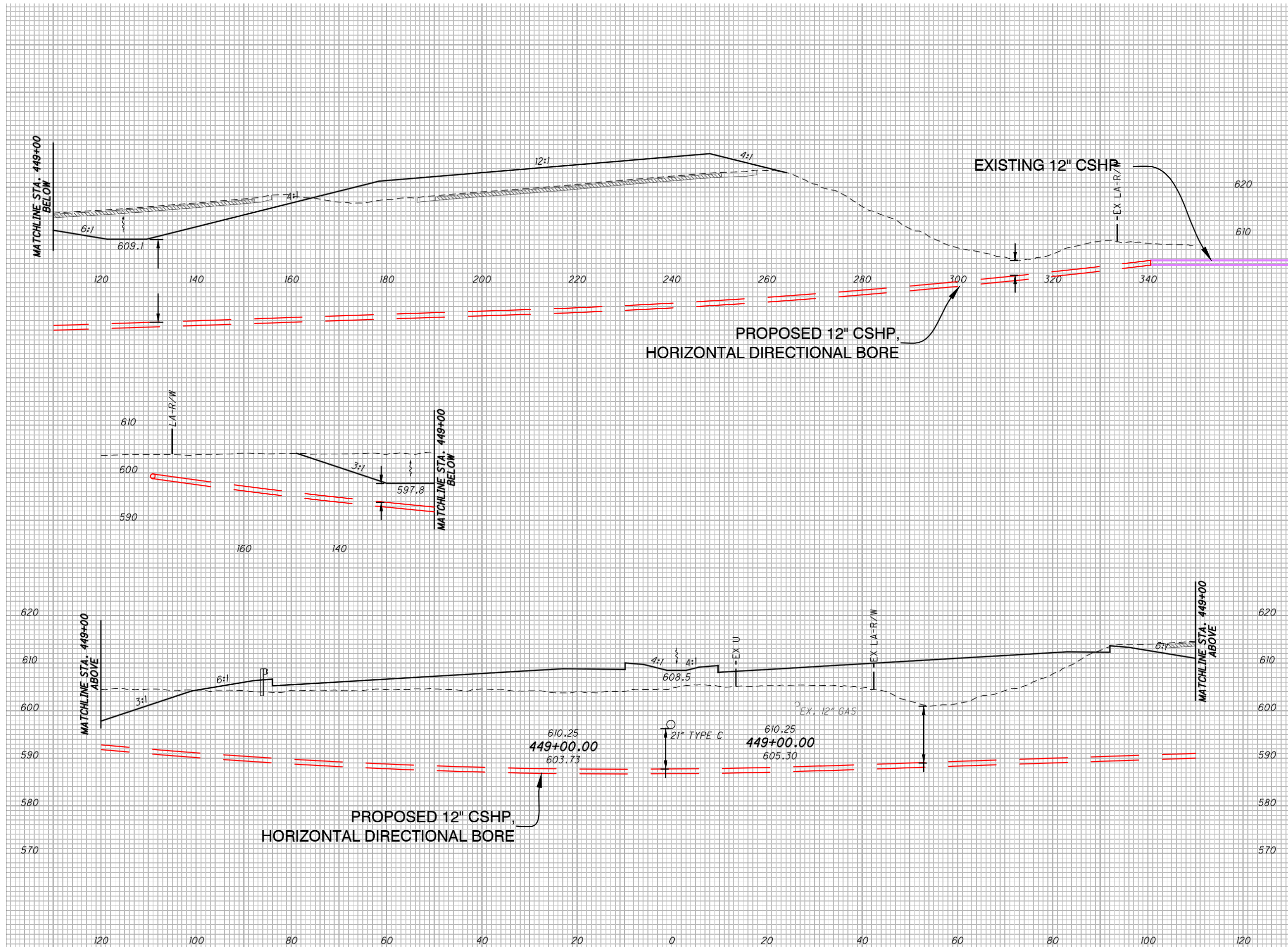
|        |      |             |
|--------|------|-------------|
|        |      |             |
|        |      |             |
|        |      |             |
|        |      |             |
|        |      |             |
|        |      |             |
| 0      |      |             |
| REV. # | DATE | DESCRIPTION |

**SITE NAME:**

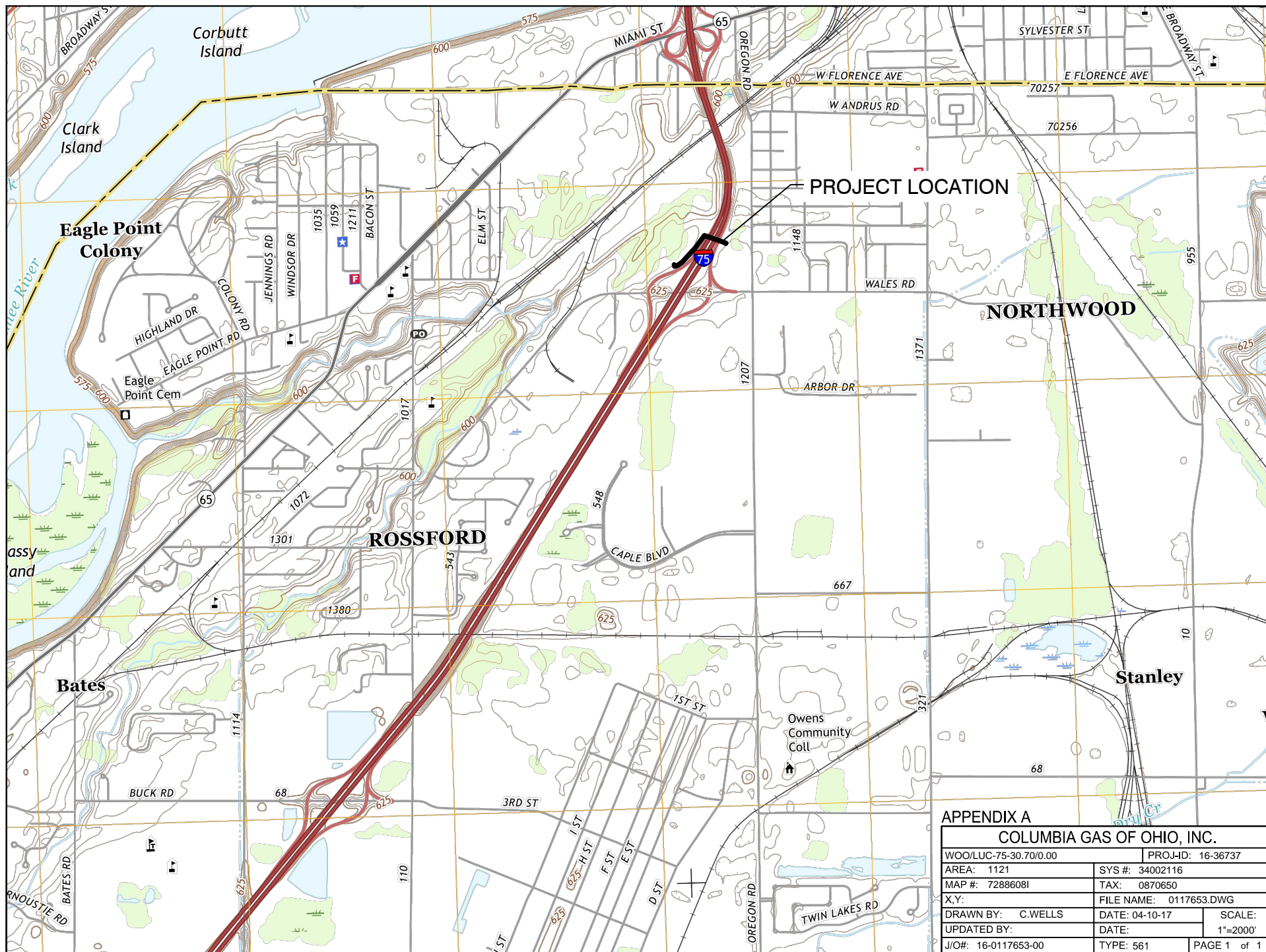
**INST# 16-0117653-00**  
**ABAN# 16-0117654-00**  
**PROJECT ID# 16-36737**

**I-75 & WALES**  
**NORTHWOOD, WOOD (173)**

## APENDIX A









Miller  
Pipeline  
Corp.

8850 CRAWFORDSVILLE  
ROAD  
P.O. BOX 34141  
INDIANAPOLIS, IN 46234  
TELEPHONE: (800) 428-3742  
TELEPHONE: (317) 293-0278  
FAX: (317) 295-6410

## **Frac-out Contingency Plan (FCP)**

### **Introduction and Purpose**

Directional drilling operations have a potential to release drilling fluids into the surface environment through frac-outs. Because drilling fluids consist largely of a bentonite clay-water mixture they are not classified as toxic or hazardous substances. However, if it is released into water bodies, bentonite has the potential to adversely impact fish and invertebrates.

While drilling fluid seepage associated with a frac-out is most likely to occur near the bore entry and exit points, frac-outs can occur at any location along the drill path. This FCP establishes operational procedures and responsibilities for the prevention, containment, and clean-up of frac-outs associated proposed directional drill.

The specific objectives of this plan are to:

1. Minimize the potential for a frac-out associated with the drilling activities;
2. Provide for the timely detection of frac-outs;
3. Ensure an organized, timely, and “minimum-impact” response in the event of a frac-out.
4. Ensure that all appropriate notifications are made immediately to the project supervisor.

Frac-out prevention plan:

1. Drill pressures will be closely monitored so they do not exceed those necessary to penetrate the formation.
2. Pressure levels will be monitored by the operator frequently.
3. The drill path will be walked frequently by those on the drilling crew.
4. After the pilot hole is complete, pre-reaming and hole-swabbing will take place prior to pulling of the material.

The response of the directional drilling crew will be as follows should a Frac-out occur:

1. The directional drilling crew will stop all operations immediately.
2. If the frac-out occurs during the pilot bore the pump will be shut off and the drill rod will be pulled back enough to release pressure.
3. The foreman onsite will then notify the project supervisor to evaluate the situation and recommend the type and level of response warranted.
4. If the frac-out is minor, easily contained, has not reached the surface, and is not threatening sensitive resources, a leak stopping compound will be used in an attempt to stop the frac-out. If the stopping compound is unsuccessful a small pit will be dug to contain the bore slurry and a pump will be put in place to transfer the material back to the recycler.
5. If the frac-out reaches the surface and becomes widespread, straw bales and silt fence will be put in place to contain the slurry until a pump or vacuum truck can be put in place. All drilling fluids will be contained and disposed of as required by law.

**MILLER PIPELINE LLC**

**FRACTION MITIGATION  
CONTINGENCY PLAN  
FOR DIRECTIONAL DRILLING**

## **TABLE OF CONTENTS**

|   |          |
|---|----------|
| <b>1.0 Introduction and Purpose</b>                       | <b>3</b> |
| <b>2.0 Description of Work</b>                            | <b>3</b> |
| <b>3.0 Site Supervisor/Foremen Responsibilities</b>       | <b>4</b> |
| <b>4.0 Equipment</b>                                      | <b>4</b> |
| <b>5.0 Training</b>                                       | <b>5</b> |
| <b>6.0 Drilling Procedures</b>                            | <b>5</b> |
| <b>6.1 Vac-Truck</b>                                      | <b>6</b> |
| <b>6.2 Field Response to Frac-Out Occurrence</b>          | <b>6</b> |
| <b>6.3 Response Close-out Procedures</b>                  | <b>7</b> |
| <b>6.4 Construction Re-start</b>                          | <b>7</b> |
| <b>6.5 Bore Abandonment</b>                               | <b>7</b> |
| <b>7.0 Notification</b>                                   | <b>7</b> |
| <b>7.1 Communicating with Regulatory Agency Personnel</b> | <b>8</b> |
| <b>7.2 Documentation</b>                                  | <b>8</b> |
| <b>8.0 Project Completion and Clean-up</b>                | <b>8</b> |

# **FRAC-OUT CONTINGENCY PLAN (FCP)**

## **1.0 Introduction and Purpose**

Directional bore operations have a potential to release drilling fluids into the surface environment through frac-outs (A frac-out is the condition where drilling mud is released through fractured bedrock into the surrounding rock and sand and travels toward the surface.) Because drilling muds consist largely of a bentonite clay-water mixture, they are not classified as toxic or hazardous substances. However, if it is released into water bodies, bentonite has the potential to adversely impact fish and invertebrates.

While drilling fluid seepage associated with a frac-out is most likely to occur near the bore entry and exit points where the drill head is shallow, frac-outs can occur in any location along a directional bore. This Frac-Out Contingency Plan (FCP) establishes operational procedures and responsibilities for the prevention, containment, and cleanup of frac-outs associated with the proposed directional drilling utility project of **Miller Pipeline LLC. / Minnesota Limited LLC.** . All personnel and Sub-Contractors responsible for the work must adhere to this plan during the directional drilling process.

The specific objectives of this plan are to:

1. Minimize the potential for a frac-out associated with directional drilling activities;
2. Provide for the timely detection of frac-outs;
3. Protect the environmentally sensitive riverbed and associated riparian vegetation;
4. Ensure an organized, timely, and "minimum-impact" response in the event of a frac-out and release of drilling bentonite; and
5. Ensure that all appropriate notifications are made immediately to the customer, management and safety personnel.

## **2.0 Description of Work:**

The proposed project consists of: *(Explain work task in detail to crew members.)*

Drilling operations will be halted by the drill rig operators immediately upon detection of a drop in drilling pressure or other evidence of a frac-out. The clean-up of all spills shall begin immediately. Management & safety department shall be notified immediately of any spills and shall be consulted regarding clean-up procedures. A spill kit shall be on-site and used if a frac-out occurs. A vacuum truck and containment materials, such as straw bales, shall also be on-site prior to and during all operations. The Site Supervisor will be immediately notified. In the event of a frac-out, the on-site foreman/supervisor will conduct an evaluation of the situation and direct recommended mitigation actions, based on the following guidelines:

- a. If the frac-out is minor, easily contained, has not reached the surface and is not threatening sensitive resources, drilling operations may resume after use of a leak stopping compound or redirection of the bore;

- b. If the frac-out has reached the surface, any material contaminated with Bentonite shall be removed by hand to a depth of 2-feet, contained and properly disposed of, as required by law. The drilling contractor shall be responsible for ensuring that the bentonite is either properly disposed of at an approved disposal facility or properly recycled in an approved manner. The Site Supervisor shall notify and take any necessary follow-up response actions in coordination with agency representatives. The Site Supervisor will coordinate the mobilization of equipment stored at off-site locations (e.g., vacuum trucks) on an as needed basis;

### **3.0 Site Supervisor/Foremen Responsibilities:**

The Site Supervisor/Foremen has overall responsibility for implementing this FCP. The Site Supervisor/Foremen will ensure that all employees are trained prior to all drilling. The Site Supervisor/Foremen shall be notified immediately when a frac-out is detected. The Site Supervisor/Foremen will be responsible for ensuring that the safety department is aware of the frac-out, coordinating personnel, response, cleanup, regulatory agency notification and coordination to ensure proper clean-up, disposal of recovered material and timely reporting of the incident. The Site Supervisor/Foremen shall ensure all waste materials are properly containerized, labeled, and removed from the site to an approved disposal facility by personnel experienced in the removal, transport and disposal of drilling mud.

The Site Supervisor/Foremen shall be familiar with all aspects of the drilling activity, the contents of this Frac-out Contingency Plan and the conditions of approval under which the activity is permitted to take place. The Site Supervisor/Foremen shall have the authority to stop work and commit the resources (personnel and equipment) necessary to implement this plan. The Site Supervisor/Foremen shall assure that a copy of this plan is available (onsite) and accessible to all construction personnel. The Site Supervisor/Foremen shall ensure that all workers are properly trained and familiar with the necessary procedures for response to a frac-out, prior to commencement of drilling operations.



#### **4.0 Equipment:**

The Site Supervisor shall ensure that:

- All equipment and vehicles are be checked and maintained daily to prevent leaks of hazardous materials;
- Spill kits and spill containment materials are available on-site at all times and that the equipment is in good working order;
- Equipment required to contain and clean up a frac-out release will either be available at the work site or readily available at an offsite location within 15-minutes of the bore site; and
- If equipment is required to be operated near a riverbed, absorbent pads and plastic sheeting for placement beneath motorized equipment shall be used to protect the riverbed from engine fluids;

#### **5.0 Training**

Prior to the start of construction, the Site Supervisor/Foremen, shall ensure that the crew members receive training in the following:

- The provisions of the Frac-out Contingency Plan, equipment maintenance and site specific permit and monitoring requirements;
- Inspection procedures for release prevention and containment equipment and materials;
- Contractor/crew obligation to immediately stop the drilling operation upon first evidence of the occurrence of a frac-out and to immediately report any frac-out releases;
- Contractor/crew member responsibilities in the event of a release;
- Operation of release prevention and control equipment and the location of release control materials, as necessary and appropriate; and
- Protocols for communication with agency representatives who might be on-site during the clean-up effort.

#### **6.0 Drilling Procedures**

The following procedures shall be followed each day, prior to the start of work. The Frac-out Contingency Plan shall available on-site during **all** construction. The Site Supervisor/Foremen shall be on-site at any time that drilling is occurring or is planned to occur. The Site Supervisor/Foremen shall ensure that a Job Briefing meeting is held at the start of each day of drilling to review the appropriate procedures to be followed in case of a frac-out. Questions shall be answered and clarification given on any point over which the drilling crew or other project staff has concerns.

Drilling pressures shall be closely monitored so they do not exceed those needed to penetrate the formation. Pressure levels shall be monitored randomly by the operator. Pressure levels shall be set at a minimum level to prevent frac-outs. During the pilot bore, maintain the drilled annulus. Cutters and reamers will be pulled back into previously-drilled sections after each new joint of pipe is added.

Exit and entry pits shall be enclosed by silt fences and straw. A spill kit shall be on-site and used if a frac-out occurs. A vacuum truck shall be readily available on-site prior to and during all drilling operations. Containment materials (Straw, silt fencing, sand bags, frac-out spill kits, etc.) shall be staged on-site at location where they are readily available and easily mobilized for immediate use in the event of an accidental release of drilling mud (frac-out). If necessary, barriers (straw bales or sedimentation fences) between the bore site and the edge of the water source, shall be constructed, prior to drilling, to prevent released bentonite material from reaching the water.

Once the drill rig is in place, and drilling begins, the drill operator shall stop work whenever the pressure in the drill rig drops, or there is a lack of returns in the entrance pit. At this time the Site Supervisor/Foremen shall be informed of the potential frac-out. The Site Supervisor/Foremen and the drill rig operator(s) shall work to coordinate the likely location of the frac-out. The location of the frac-out shall be recorded and notes made on the location and measures taken to address the concern. The following subsections shall be adhered to when addressing a frac-out situation.

Water containing mud, silt, bentonite, or other pollutants from equipment washing or other activities, shall not be allowed to enter a lake, flowing stream or any other water source. The Bentonite used in the drilling process shall be either disposed of at an approved disposal facility or recycled in an approved manner. Other construction materials and wastes shall be recycled, or disposed of, as appropriate.

#### **6.1 Vac-Truck:**

A vacuum truck shall be staged at a location from which it can be mobilized and relocated so that any place along the drill shot, can be reached by the apparatus, within 10 minutes of a frac-out.

#### **6.2 Field Response to Frac-out Occurrence:**

The response of the field crew to a frac-out release shall be immediate and in accordance with procedures identified in this Plan. All appropriate emergency actions that do not pose additional threats to sensitive resources will be taken, as follows:

- a. Directional boring will stop immediately;
- b. The bore stem will be pulled back to relieve pressure on frac-out;
- c. The Site Supervisor/Foremen will be notified to ensure that management and the safety department is notified, adequate response actions are taken and notifications made;
- d. The Site Supervisor/Foremen shall evaluate the situation and recommend the type and level of response warranted, including the level of notification required;
- e. If the frac-out is minor, easily contained, has not reached the surface and is not threatening sensitive resources, a leak stopping compound shall be used to block the frac-out. If the use of leak stopping compound is not fully successful, the bore stem shall be redirected to a new location along the desired drill path where a frac-out has not occurred;
- f. If the frac-out has reached the surface, any material contaminated with Bentonite shall be removed by hand, to a depth of 2-feet, contained and properly disposed of, as required by law. A dike or berm may be constructed around the frac-out to entrap released drilling fluid, if necessary. Clean sand shall be placed and the area returned to pre-project contours; and
- g. If a frac-out occurs, reaches the surface and becomes widespread, the Site Supervisor/Foremen shall authorize a readily accessible vacuum truck and bulldozer stored off-site to be mobilized. The vacuum truck may be either positioned at either end of the line of the drill so that the frac-out can be reached by crews on foot, or may be pulled by a bulldozer, so that contaminated soils can be vacuumed up.

### **6.3 Response Close-out Procedures:**

When the release has been contained and cleaned up, response closeout activities will be conducted at the direction of the Site Supervisor/Foremen and shall include the following:

- a. The recovered drilling fluid will either be recycled or hauled to an approved facility for disposal. No recovered drilling fluids will be discharged into streams, storm drains or any other water source;
- b. All frac-out excavation and clean-up sites will be returned to pre-project contours using clean fill, as necessary; and
- c. All containment measures (fiber rolls, straw bale, etc.) will be removed, unless otherwise specified by the Site Supervisor/Foremen.

#### **6.4 Construction Re-start:**

For small releases not requiring external notification, drilling may continue, if 100 percent containment is achieved through the use of a leak stopping compound or redirection of the bore and the clean-up crew remains at the frac-out location throughout the construction period.

For releases requiring external notification and/or other agencies, construction activities will not restart without prior approval from the safety department.

#### **6.5 Bore Abandonment:**

Abandonment of the bore will only be required when all efforts to control the frac-out within the existing directional bore have failed.

#### **7.0 Notification:**

In the event of a Frac-out that reaches a water source, the Site Supervisor/Foremen will notify safety department so they can notify the appropriate resource agencies. All agency notifications will occur within 24 hours and proper documentation will be accomplished in a timely and complete manner. The following information will be provided:

1. Name and telephone number of person reporting;
2. Location of the release;
3. Date and time of release;
4. Type and quantity, estimated size of release;
5. How the release occurred;
6. The type of activity that was occurring around the area of the frac-out;
7. Description of any sensitive areas, and their location in relation to the frac-out;
8. Description of the methods used to clean up or secure the site; and
9. Listing of the current permits obtained for the project.

#### **7.1 Communicating with Regulatory Agency Personnel:**

All employees and subcontractors will adhere to the following protocols when permitting Regulatory Agency Personnel arrive on site. Regulatory Agency Personnel will be required to comply with appropriate safety rules. Only the Site Supervisor/Foremen and the safety department are to coordinate communication with Regulatory Agency Personnel.

## **7.2 Documentation:**

The Site Supervisor/Foremen shall record the frac-out event in his or her daily log. The log will include the following: Details on the release event, including an estimate of the amount of bentonite released, the location and time of release, the size of the area impacted, and the success of the clean-up action. The log report shall also include the: Name and telephone number of person reporting; Date, How the release occurred; The type of activity that was occurring around the area of the free-out: Description of any sensitive areas, and their location in relation to the frac-out: Description of the methods used to clean up or secure the site; and a listing of the current permits obtained for the project.

## **8.0 Project Completion and Cleanup:**

- a. All materials and any rubbish-construction debris shall be removed from the construction zone at the end of each workday;
- b. Sump pits at bore entry and exits will be filled and returned to natural grade; and
- c. All protective measures (fiber rolls, straw bale, silt fence, etc.) will be removed unless otherwise specified by the Site Supervisor/Foremen.

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**7/11/2017 2:34:55 PM**

**in**

**Case No(s). 17-1557-GA-BNR**

Summary: Notice /Construction Notice Application, Appendix A, and Appendix B concerning a proposed pipeline relocation known as the I-75 Mandatory Relocation Project electronically filed by Cheryl A MacDonald on behalf of Columbia Gas of Ohio, Inc.