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May 14, 2019

Via Electronic Filing

Ms. Tanowa Troupe
Administration/Docketing
Public Utilities Commission of Ohio
180 East Broad Street, 11th Floor
Columbus, OH 43215

**Re: East Ohio Gas Company d/b/a Dominion Energy Ohio PIR 567,
Case No. 19-0135-GA-BNR**

Dear Ms. Troupe:

On March 15, 2019, the Ohio Power Siting Board ("OPSB") Staff issued a Report of Investigation approving the Construction Notice subject to a number of conditions. Within this set of conditions, Condition No. 3 requires:

Prior to the use of horizontal directional drilling, the Applicant shall provide staff with a frac-out contingency plan detailing monitoring, environmental specialist presence, containment measures, cleanup, and restoration.

In compliance with Staff Report Condition No. 3, attached is a copy of the East Ohio Gas Company d/b/a Dominion Energy Ohio's frac-out contingency plan for this project.

Please contact me if you have any questions regarding this matter.

Sincerely,

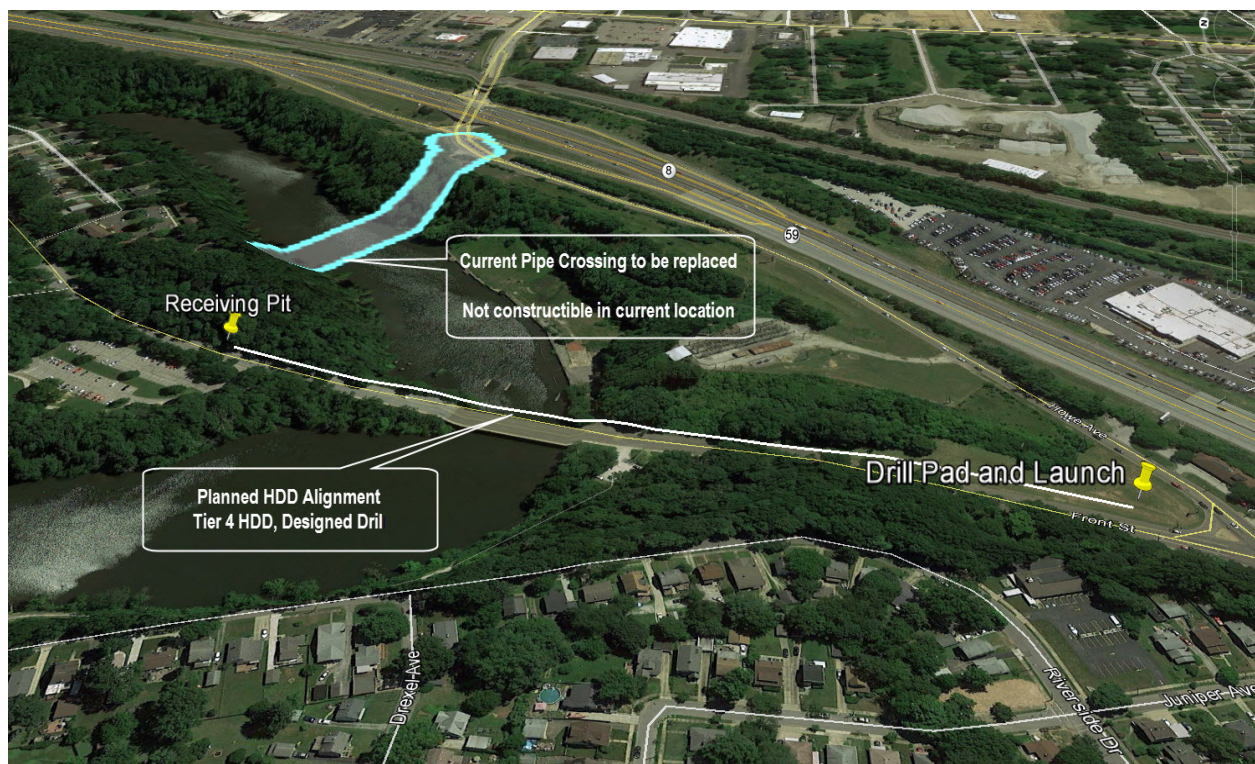
Devin D. Parram

Attachment

Cc: Grant Zeto (w/Attachment)
Andrew Conway (w/Attachment)

PIR 567 Cuyahoga River

Inadvertent Return Contingency and Response Plan



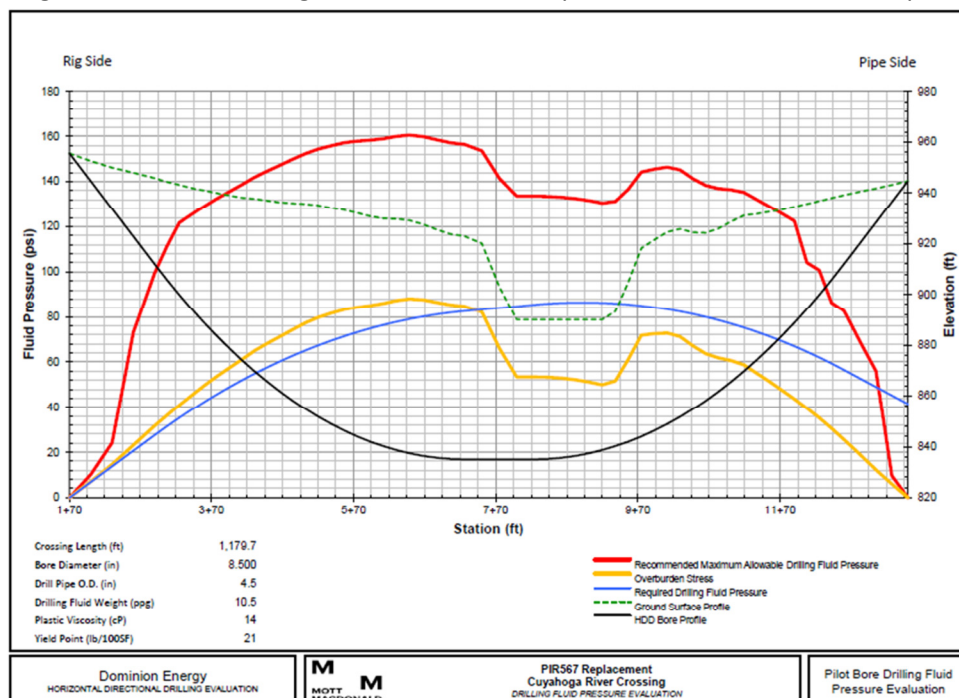
PIR 567 Directional Drill Overview

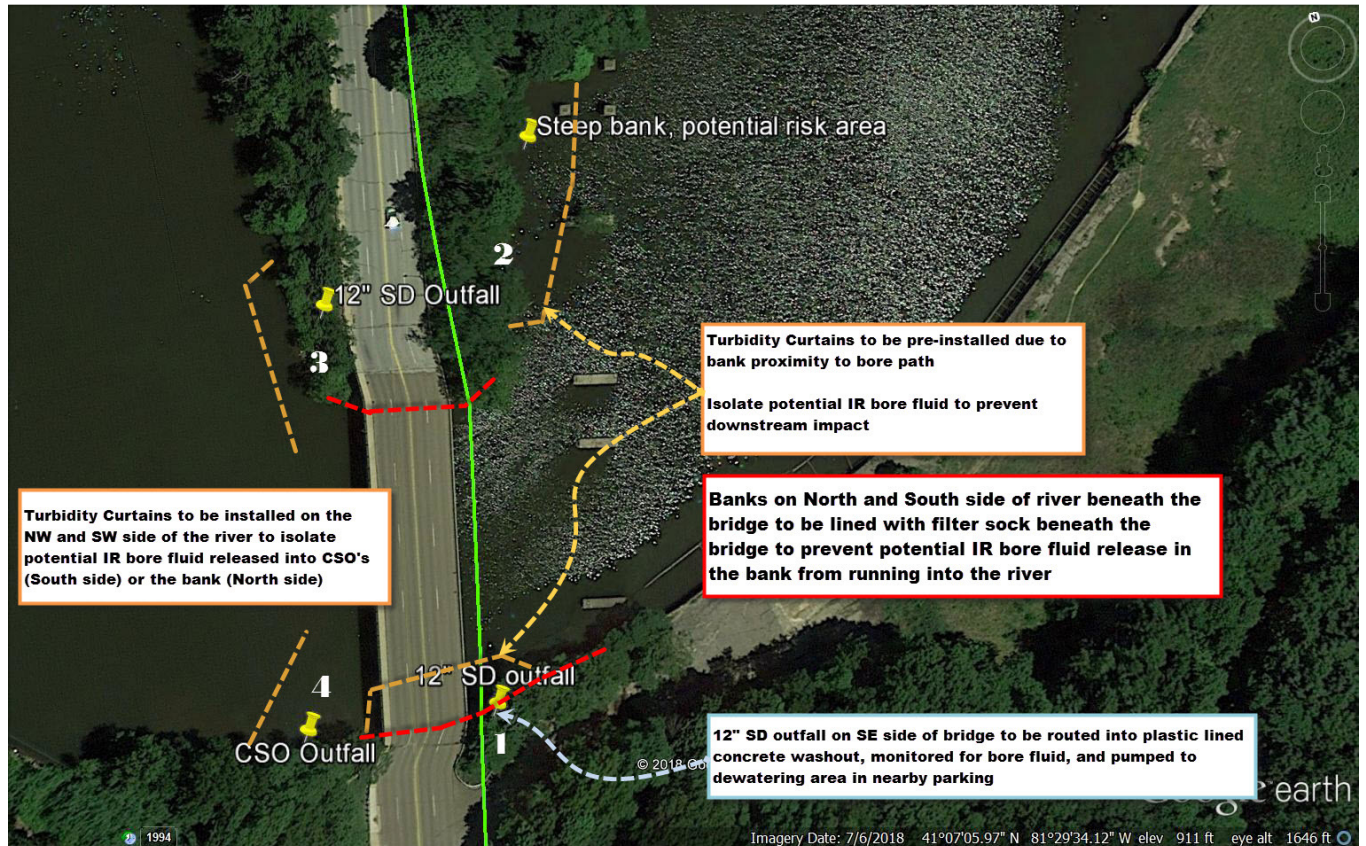
The directional alignment is in public right of way along Front Street, crossing the Cuyahoga River at the boundary between the cities of Akron and Cuyahoga Falls. The directional drill rig, pad, and supporting equipment will be established on the Southeast side of the bridge in a temporary construction easement provided by the City of Akron. The receiving pit for the drill will be on the Northeast side of the bridge in Cuyahoga Falls right of way. The directional drill will feature aggressive entry and exit angles (20 degrees) to allow for the required depth target beneath the river bed (50 feet) to be reached while retaining a conservative bend radius of 1,275 feet. Geotechnical data indicates consistent soils through the corridor with 13 – 19 feet of medium dense fill material and sandy silt overlying the existing bedrock. The proposed depth of the drill is 50 feet beneath the Cuyahoga River to take advantage of the bedrock formation and to clear the bridge foundations. The project has been designed and planned for pipe pullback to occur in a single pull. The North bound travel lane on the East side will be closed for the entire length of the directional drill to facilitate safe movement of DEO personnel along the path and to stage equipment to weld, coat, inspect, and lift the string for pullback.

The following is a supplement to the current approved DEO Inadvertent Response Plan and provides site specific information and planning due to the possibility of an IR near or within the river. All standard DEO BMP's and processes will be implemented and followed for the duration of construction.

Areas of IR Risks/Concern

Typically, the risks for an inadvertent return are highest during the pilot drill itself, at locations with the highest annular pressures or the least ground cover. In the instance of this drill, the North and South banks of the river are areas of concern. The annular pressures are high in these areas and with the bore path rising and cover decreasing, these areas are the path of least resistance for a potential IR.





Location 1

The SE side of the bridge has a 12" storm drain outfall dumping down a concrete spillway into the river. Based on this being in direct alignment with the bore path in the location where we will have the highest pressures based on the design, we identified this as our primary risk. To mitigate the potential of a return migrating into the storm drain and releasing into the river, the outfall will be routed into a plastic lined concrete washout container (or similar) to be monitored and to provide initial containment if there is a release. If fluids are detected the reservoir will be pumped over to a nearby parking area where a dewatering and containment area will be established to prevent bore fluids from going into the river. A frac-tank with secondary containment will be staged at the nearby parking area for additional fluid containment and storage.



Additionally the South side of the river bank will be lined with filter sock beneath the bridge to prevent any potential IR in the bank from running into the river. Several small sections (approximately 4'-5' long) of filter sock will be staged at this location in addition to the preinstalled section to allow for quick installation as needed if an IR occurs. A turbidity curtain will be preinstalled as depicted to isolate potential bore fluid release in the shallow area of the bank. These can be repositioned as needed should an IR occur.

Location 2

The NE bank is extremely steep and inaccessible (safely) from the land side. The bore path will be running beneath the bank with the pipe angling up towards the receiving pit. Concern here is of a return exiting the bank and running into the water before we can respond. A turbidity curtain will be pre-installed to isolate the area and prevent any potential IR fluid from being carried downstream.



Additionally the North side of the river bank will be lined with filter sock beneath the bridge to prevent any potential IR in the bank from running into the river. Several small sections (approximately 4'-5' long) of filter sock will be staged at this location in addition to the preinstalled section to allow for quick installation as needed if an IR occurs.

Location 3

There is a 12" clay tile outfall on the NW bank of the river coming from the bridge. The area is steep and rocky with difficult access on foot. The 12" storm drain will be plugged using a plumber's plug at the bridge to prevent any returns from migrating into the SD and releasing into the river.



The NW bank is extremely steep and inaccessible (safely) from the land side. Concern here is of a return exiting the bank and running into the water before we can respond. A turbidity curtain will be pre-installed to isolate the area and prevent any potential IR fluid from being carried downstream.

Location 4

The SW side of the bridge has a storm drain and two CSO's releasing into the river. The area is steep and not safely accessible by foot. A turbidity curtain will be pre-installed to isolate the area and prevent any potential IR fluid from being carried downstream.



IR within the River

The biggest concern is an IR within the river itself towards the center where isolation devices cannot be pre-staged. DEO Environmental has been in contact with Ohio EPA to coordinate potential response efforts if such an event should occur. During drill operations DEO personnel and 3rd party environmental inspectors will be monitoring the river from the banks and bridge itself for any returns into the river. The West side of the bridge has a sidewalk which can be used for these efforts, and the travel lane on the East side will be closed for the duration of the project allowing safe travel for employees and inspectors as they monitor the river. A vac truck will be staged and ready on the bridge along with various materials and equipment should an IR occur.



Per recommendation from Ohio EPA, a pre-fabricated, watertight wooden containment device or floatable boom/water bags will be on site to isolate and contain any drilling mud. A motorized boat large enough to support clean up and response will be on site and available if needed (ODNR has been notified of the use of a motorized boat on the river). Should an IR occur our environmental inspectors will monitor turbidity with sediment sticks and DEO will communicate with Ohio EPA throughout any response.

General HDD Operations

1. Outside North bound travel lane to be closed from Cuyahoga Falls Ave to HDD exit pit
 - a. Free access for vac truck if needed or other IR response equipment
 - b. Safe travel for EnviroScience, contractors, and DEO personnel
 - c. Typical inlet protection to be installed at inlets
2. DRS to have boat onsite at all times for IR response
 - a. Of adequate size to facilitate and support response
 - b. Motorized
3. IR response equipment and materials to be staged on site for response as needed
 - a. In closed travel lane on North side of bridge
 - b. In parking area on South side of bridge
 - c. Appropriate length hose must be verified to ensure vac-truck can reach applicable areas
4. During pilot bore two inspectors from EnviroScience will be on site to sweep the area and monitor for potential returns.
 - a. One inspector for each side of the river
 - b. If any returns are detected inspector to notify DEO and drilling operations to be halted to evaluate the situation
 - c. Drilling operations not to resume without DEO approval
5. If any returns are identified in the river, whether or not they are contained by turbidity curtains, drilling operations to cease and DEO to notify Ohio EPA
 - a. Take steps to isolate the returns
 - b. Seek Ohio EPA guidance or recommendations
 - c. Consider abandoning pilot bore and redrilling
 - d. Drilling operations not to resume without DEO approval
6. If bore fluid loss (with no noticed IR) exceeds 20% (open for discussion) drilling operations to halt for evaluation of the situation
 - a. Consider abandoning pilot bore and redrilling
 - b. Drilling operations not to resume without DEO approval
7. If bore fluid loss reaches 50% during drill, HDD operations to be shut down and Ohio EPA notified
 - a. Seek Ohio EPA guidance or recommendations
 - b. Consider abandoning pilot bore and redrilling
 - c. Drilling operations not to resume without DEO approval
8. If heavy rain events occur during drilling operations, drilling to be stopped (if possible)
 - a. SE and NW SD outfall to be unplugged
 - b. EnviroScience to monitor for returns
 - c. Once outfall volumes slow and IR measures can be put back in place, drilling operations to resume with DEO approval

Communications

In the event of an inadvertent return, effective communication will be critical in coordinating the response and notifying regulatory agencies. Below are general responsibilities and notifications to be made.

- Construction Inspector (Mark Hensel)
 - Notify PM (Jonathon Blackwell)
 - Notify supervisor (David Croft)
 - Notify environmental construction support (Michael Massoli)
 - Notify Environmental Compliance (David Fredle)

- Project Manager (Jonathon Blackwell)
 - Notify Supervisor (Tyson Papay)
 - Notify Manager (Jeff Angeletti)
 - Notify DEO Environmental (Tara Buzzelli)
 - Confirm Environmental Compliance has been notified
 - DEO State and Local Affairs (Neil Durban and Tracy Stevens)

- Environmental Compliance (David Fredle)
 - Notify Ohio EPA (Kurt Kollar)

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

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Case No(s). 19-0135-GA-BNR

Summary: Correspondence of the East Ohio Gas Company d/b/a Dominion Energy Ohio in Compliance with Staff Report Condition No. 3 electronically filed by Teresa Orahood on behalf of Devin D. Parram