APPENDIX M

HORIZONTAL DIRECTIONAL DRILL CONTINGENCY PLAN

south branch solar

Horizontal Directional Drilling Contingency Plan

South Branch Solar
Hancock County, Ohio

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Introduction

South Branch Solar, LLC (South Branch) is proposing an up to 205-megawatt solar energy facility, South Branch Solar (the Project) on approximately 1,000 acres within Washington Township, Hancock County, Ohio (the Project Area). Although the majority of the Project Area is upland and will not require stream crossings, some limited areas exist where underground electrical interconnections may use a trenchless excavation method known as horizontal directional drilling (HDD). HDD is a steerable utility installation system commonly used to install cable and pipelines beneath roads, rivers, wetlands, and other obstacles. HDD is a safe, efficient, cost-effective method and utilizes a watery mud-slurry, drilling fluid mixture throughout the operation in order to reduce friction and stabilize the drilled hole. The drilling fluid mixture typically consists primarily of water, with limited amounts of bentonite clay, a natural, non-toxic substance.

During the HDD process there is potential for drilling fluids to be inadvertently released to the surface (sometimes referred to as “frac-out” or “release”). Frac-out is most likely to occur near the bore entry and exit points, however, the entire bore hole will be monitored for instances of seepage or inadvertent release during construction.

The following operational procedures and outlined responsibilities will be established for the prevention, containment, and remediation of any frac-outs that may occur in connection with the potential use of HDD as part of the Project. It is expected that, while in-field roles will be associated with members of the construction contractor’s team, South Branch will provide oversight for the implementation of these measures.

Procedures and Responsibilities

Any potential HDD operations will be carefully monitored and carried out by an experienced contractor. A Site Supervisor will be designated to oversee any potential HDD activities, and to lead the implementation of this frac-out management plan.

In addition, South Branch will have an environmental specialist on-site during construction activities that may affect sensitive areas, including during the implementation of HDD activities. The specialist will be familiar with water quality protection issues and potential threatened or endangered species of plants and animals that may be encountered. The environmental specialist will have authority to direct the Site Supervisor to implement measures in the event necessary for environmental protection.

Monitoring of HDD activity will include inspection of the entry and exit points as well as along the drill path, continuous examination of drilling pressures and return flows, and necessary documentation of drilling status and conditions.

The Site Supervisor will be responsible for ensuring that all relevant employees are trained properly for conducting standard HDD activity and responding to potential inadvertent release. The Site Supervisor will be responsible for confirming availability and managing the necessary equipment on-site during which time HDD frac-out may occur and utilizing such equipment safely and effectively. In the event of any inadvertent frac-out from HDD activities, the Site Supervisor will be responsible for reporting such occurrences to the required and appropriate agencies.

Equipment

If HDD is utilized in Project construction, certain equipment will be made available in order to carry out such work safely and in preparation of any inadvertent release occurrences. Such equipment may include spill response kits and spill containment materials, hay bales, silt fences, sandbags, portable pumps, plastic sheeting, and a vacuum truck.

Inadvertent Release Containment & Control

If inadvertent release of drilling fluid is detected as a result of HDD activities taking place on-site, the contractor will take immediate action to identify the release and ensure appropriate response is taken, in consultation with the environmental specialist. The release will be promptly assessed by the contractor, in coordination with the environmental specialist and communication with the South Branch, to determine whether the release may potentially reach adjacent waterbodies, wetlands or other nearby sensitive areas.

If inadvertent release occurs in upland areas immediate actions will be taken to contain the release, utilizing hay bales, silt fences, and sandbags. Once contained the released fluid will be collected using appropriate equipment and either recycled or disposed of in an approved location.

If an inadvertent release occurs in a wetland or other waterbody, whether of inside or outside of the Project Area, immediate actions will be taken to contain the release and prevent migration. If public health and safety are threatened by an inadvertent release, all drilling operations will halt immediately until the threat is eliminated.

All disturbed areas associated with the Project will be stabilized and restored per the specifications outlined in the Project Stormwater Pollution Prevention Plan.

Reporting

If an inadvertent release occurs within a wetland, waterbody, or other sensitive resource area, the contractor and/or Site Supervisor will immediately notify South Branch. Regulatory agencies will be notified as required by applicable laws and regulations and will include:

Date and time of inadvertent release;
Location of the release;
Type and approximate quantity of the release;
How the release occurred, and HDD activity being performed at the time;
Description of potentially sensitive areas in relation to release location; and
Description of methods to contain and remediate the release location, as applicable.

For minor releases not requiring regulatory reporting, HDD may continue if full containment is achieved as described above. For releases requiring external reporting and communication, HDD activities shall not restart without prior approval from the Site Supervisor and the environmental specialist.

Summary: Application Appendix M – Horizontal Directional Drill Contingency Plan electronically filed by Ms. Megan Zemke on behalf of Borchers, Dylan F