



## Ohio Administrative Code Rule 1501:9-1-05 Simultaneous operations.

Effective: October 4, 2021

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(A) As used in this rule:

(1) "Fall impact radius" means either of the following as applicable:

(a) The distance calculated in feet by multiplying the total height of overhead equipment by a safety factor of 1.2 and measured laterally from the well being constructed or accessed; or

(b) For drilling rigs, the distance calculated in feet by multiplying the total height of overhead equipment from the drilling rig floor to the crown block by a safety factor of 1.2 and measured laterally from the well being constructed or accessed.

(2) "Emergency shutdown system" means a valve or a system of valves that, when activated, initiate an automated shutdown of production operations.

(3) "Overhead equipment" means any aerial, suspended, raised, elevated, or projected equipment over the height of the well being constructed or accessed.

(4) "Overhead operation(s)" means the use of overhead equipment for the purpose of well drilling, well stimulation, well completion, well logging, well testing, workover, reconditioning, plugging back and plug and abandonment.

(5) "Production operation(s)" means the same as in section 1509.01 of the Revised Code.

(6) "Simultaneous operation(s)" means any overhead operations where a well or wells not being constructed or accessed are located within the fall impact radius of overhead equipment used to construct or access a well.

(7) "Simultaneous operations plan" means a written plan that sets forth the simultaneous



operation(s), considers the risks to existing production operations that are located within the fall impact radius, describes the actions to be performed to mitigate risks to the existing production operations that are located within the fall impact radius, and that includes all of the following:

(a) The location of the work planned identified in any of the following ways:

- (i) The permit number for the horizontal well site constructed in accordance with rule 1501:9-02 of the Administrative Code;
- (ii) The GPS location of the well pad constructed before July 16, 2015; and
- (iii) The GPS location of the well.

(b) Emergency contact information of the applicant;

(c) A map on a scale not smaller than four hundred feet to the inch for each different type of overhead operation that contains the following: and

- (i) Legend, date prepared, scale bar, scale in feet, north arrow, and version number;
- (ii) Identification of each well on the well pad with the corresponding API number and well name;
- (iii) Identification of each proposed well with proposed well name and number, if applicable;
- (iv) Identification of each fall impact radius;
- (v) Identification of all surface production operations within each fall impact radius;
- (vi) Identification of each location of each emergency shutdown device; and
- (vii) Identification of each lower explosive level monitoring location on the well pad.

(d) Information regarding the wells located within each fall impact radius including all of the



following:

- (i) Dates wells were drilled, stimulated, and placed into production;
- (ii) Well(s) production configuration (casing flow, tubing flow, artificial lift);
- (iii) Average daily production of oil, gas, and water for each well for the previous thirty days before submittal of the plan; and
- (iv) Highest recorded tubing, casing, and annular pressures for all strings for each well, including the measurement dates, for thirty days prior to submittal of the plan.
- (e) A drawing illustrating:
  - (i) The location on the well pad and corresponding height of all overhead equipment to be utilized during simultaneous operations; and
  - (ii) The location and depth of burial of all subsurface piping located on the well pad;
- (8) "Well pad" means the same as in section 1509.01 of the Revised Code.
- (9) "Workover" means performing work on a well using coiled tubing, snubbing, or installing or removing tubing or pipe.
- (B) On and after the effective date of this rule, no person shall conduct production operation(s) resulting in simultaneous operation(s) without first having electronically submitted in a format approved by the chief and received written acceptance of a simultaneous operations plan.
- (1) If the applicant proposes to produce wells located within the fall radius during overhead operations, the chief will not accept the plan unless all of the following are included:
  - (a) A description of the how the offset well(s) and production operations will be shut-in during mobilization/demobilization activities and any movement of overhead equipment;



- (b) A description of cages, with high visibility markings, that will be installed and secured over wells prior to and during simultaneous operations;
  - (c) A description of barriers, with high visibility markings, that will be installed around the perimeter of wells and production equipment prior to and during simultaneous operations;
  - (d) A description of tanks that will remain on location prior to and during simultaneous operations that are capable of holding at least 1.5 times the volume of kill weight fluid needed for each well located in the fall radius;
  - (e) A description of the piping (kill lines) capable to connect the tanks of kill weight fluid to all wells located within the fall radius prior to and during simultaneous operations;
  - (f) A description of how kill lines will be installed and maintained from tanks to each well located within the fall radius prior to and during simultaneous operations;
  - (g) A description of the lower explosive limit monitors that will be placed around production operations on the well site prior to and during simultaneous operations;
  - (h) A description of an emergency shutdown system that will be installed at the location;
  - (i) A description of lifts to be performed during simultaneous operations; and
  - (j) A description of the qualifications of the person performing lifts, the supervisor or spotter that will be present during all lifts, and the review procedures of the overhead operations plan.
- (2) If the applicant proposes to shut-in wells located within the fall radius during overhead operations, or cannot meet the requirements in paragraph (B)(1) of this rule, the chief will not accept a simultaneous operations plan unless all of the following are included:
- (a) A description of the internal barrier(s), type(s), and purpose(s) that will be installed in each well within the fall radius, excluding pre-existing valves, to suspend production and prevent flow during



simultaneous operations;

(b) A description of how each wellhead will be configured/deconstructed and night cap installed or lock out/tag out-performed on master and wing valves prior to and during simultaneous operations;

(c) A description of how all production operations within the fall radius will be emptied, purged, depressurized, and/or decommissioned prior to and during simultaneous operations; and

(d) A description of how midstream facilities on the well site will be isolated and depressurized prior to and during simultaneous operations.

(3) For all simultaneous operations conducted pursuant to a plan accepted by the chief under paragraph (B) of this rule, all of the following apply;

(a) No lifts may occur above a well(s) that is not being constructed or accessed;

(b) An emergency shutdown system shall be tested before simultaneous operations begin and the owner will directly notify the chief at least twenty-four hours before testing; and

(c) Any equipment installed pursuant to paragraph (B) of this rule, must be in good working order and function properly.

(C) Review

(1) The chief may request additional information be included in the simultaneous operations plan if the chief determines such information is necessary to protect public health, safety, and/or the environment.

(2) Upon receipt, the chief will review the simultaneous operations plan and either accept or reject the plan in writing within thirty business days. Upon receipt, the chief will review a simultaneous operations plan involving a workover and either accept or reject the plan in writing within twenty business days.



(D) Operational requirements

(1) The person must follow the accepted simultaneous operations plan while conducting simultaneous operations.

(2) When a simultaneous operations plan is required by this rule, the person must provide direct notification to the inspector or a person at a regional office two business days prior to the beginning of simultaneous operations in the accepted plan.

(3) Prior to conducting simultaneous operations pursuant to a plan accepted under paragraph (B) of this rule, the chief will verify that the operations on the well site are implemented in accordance with the accepted simultaneous operations plan. The chief may grant written permission to conduct simultaneous operations if the chief cannot verify operations are implemented in accordance with the accepted simultaneous operations plan.

(4) A person shall directly notify the division if a simultaneous operations plan did not perform as designed.

(5) A copy of the most recently accepted simultaneous operations plan shall be kept in a readily-accessible location at the well site.

(E) Plan Modifications. Prior to conducting production operations, a previously accepted simultaneous operations plan must be modified to reflect any changes in the production operations and the modifications submitted to the division in writing. The division will review all modifications in accordance with the requirements of this rule and accept modifications in writing or reject within two business days of receipt.