

PUC

BEFORE THE PUC

REBUTTAL IN RECONDANCE 2ND PRELIMINARY OBJECTIONS

Docket # C-20193007458

WITNESS THAT PETITIONER JASON PAUL HAS BEEN ATTEMPTED TO RESOLVE THE DISPUTE ON HIS OWN IN OCCORD TO THE CNX OFFER TO DO SO, SHORTLEY AFTER CNX QUICKLY REFILED PRELIMINARY OBJECTIONS.

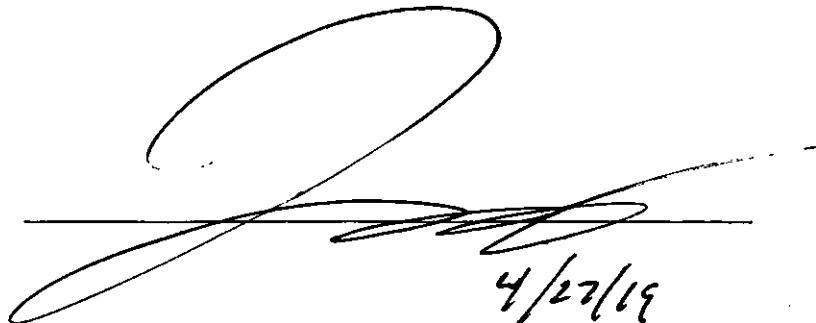
IT IS QUITE CLEAR THAT CNX IS UP TO NO GOOD ATTACHED TO THIS REPOSE OUR VARIOUS EXHIBITS SHOWING THE MALICE INTENT THEY POSSES.

1. §1.34 OF PUC CODE SUBMITTALS BEFORE THE PUC CAN COVER MORE THEN ONE SUBJECT. WEREAS THE COMPLAINT STATES THERE IS GENERALALLY A 1000\$ VAULUE ATTACH TO MISCONDUCT OF CNX GAS CO. WHEREAS IT'S THE GENERALY SPIRT OF PUC TO ISSUE A OPTION ON WHEATER OR NOT CNX GAS IS ALLOWED TO OPERATE GAS OPERATION ON U.S CITZINS LAND WITHOUT THERE PERMISSION, AS STATED IN SECOND COMPALT THERE ARE PUC SAFETY REQUIREMENTS THAT CNX ARE REQUIRED TO OBUY TO WHITCH PART COMPLAINT IS ABOUT.
2. §5.22(6) RELEIF SOUGHT INCONJUNCTION WITH ABOUVE CODE ITS IS RECONDANCE RIGHT TO ADD VARIOUS MATTERS ASSOCTED WITH COMPLAINT. WHEREAS SINCE BEGAINING ITS HAS BEEN COMPAINTS FOCAS THAT GAS RIGHTS WERE VIOLATED, IN SUCH A WAY TO RELAVEANT TO PUC CODE. SUCH AS SAFETY CODES ECT. IS IT LEGAL UNDER SAFETY CODE TO USE MINERAL RIGHTS RECKLESSLY WITHOUT MAKING LAND OWNER AWARE. THESE ARE ALL THINGS RELVANT TO PUC AND AS SUCH COMPALINT HAS ENTERED A VALUE FOR SUCH DAMAGES HIS SEES FIT REGARDLESS IF IT RELVANT TO PUC IN ACCORDANCE TO ABOVE STANDARD ITS ACCEPTABLE TO ALLOW SUCH TO BE DONE. COMPALINT FEELS NESSARY TO PERSERVE A VALUE TO ASSERT A DAMAGE IN A COURT OF COMMON PLEAS COURT IF THE NEED A RISES.

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4/27/19

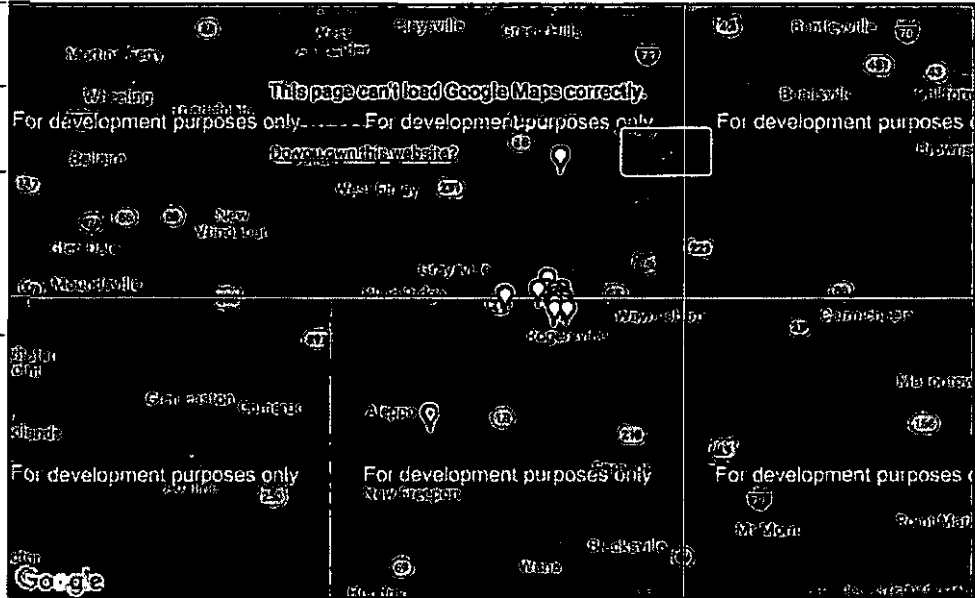
Operator: CNX GAS CO LLC

309 Wells

21 Violations

\$ 82,750
Total Fines

-  Permit Issued
-  Spudded Well
-  Producing Well
-  Violations



1 / 16 Next

Site Name	County	Municipality	Operator	Violations
JAMES A STEPP GA	Greene	Aleppo Twp	CNX GAS CO LLC	1
CONSOL PENNSYLVANIA COAL CO CNX-1	Greene	Center Twp	CNX GAS CO LLC	0
CONSOL PENNSYLVANIA COAL CO CNX-4	Greene	Center Twp	CNX GAS CO LLC	0
CONSOL PENNSYLVANIA COAL CO CNX-3	Greene	Center Twp	CNX GAS CO LLC	1
CONSOL PA COAL CO CNX-2A	Greene	Center Twp	CNX GAS CO LLC	0
CONSOL GH8CV	Greene	Center Twp	CNX GAS CO LLC	0
CONSOL GH12CV	Greene	Center Twp	CNX GAS CO LLC	0
CONSOL GH2CV	Greene	Center Twp	CNX GAS CO LLC	0
CONSOL GH6CV	Greene	Center Twp	CNX GAS CO LLC	0
CONSOL PENNSYLVANIA COAL CO CNX-2A	Greene	Center Twp	CNX GAS CO LLC	0
CONSOL GH19CV	Greene	Center Twp	CNX GAS CO LLC	0
CONSOL GH10ACV-A	Greene	Center Twp	CNX GAS CO LLC	0
CONSOL GH10CV	Greene	Center Twp	CNX GAS CO LLC	0
CONSOL GH21CV	Greene	Center Twp	CNX GAS CO LLC	0
CONSOL GH14CV	Greene	Center Twp	CNX GAS CO LLC	0
CONSOL GH24CV	Greene	Center Twp	CNX GAS CO LLC	0
CONSOL GH30CV	Greene	Center Twp	CNX GAS CO LLC	0
CONSOL GH28CV	Greene	Center Twp	CNX GAS CO LLC	0
CONRHEIN NV17ACV	Greene	Morris Twp	CNX GAS CO LLC	0
CONSOL GH26CV	Greene	Center Twp	CNX GAS CO LLC	0

Drilling Counties

- | | | | | | | | | |
|-----------|----------|------------|----------|------------|------------|----------|-------------|--------------|
| Allegheny | Blair | Cameron | Clinton | Forest | Lackawanna | Mckean | Susquehanna | Washington |
| Armstrong | Bradford | Centre | Columbia | Greene | Lawrence | Potter | Tioga | Wayne |
| Beaver | Butler | Clarion | Elk | Huntingdon | Luzerne | Somerset | Venango | Westmoreland |
| Bedford | Cambria | Clearfield | Fayette | Indiana | Lycoming | Sullivan | Warren | Wyoming |
| | | | | Jefferson | | | | |

CNX Gas Co. Will Pay DEP and Fish and Boat Commission More Than \$450,000 for Water Withdrawal Violations in Washington County

Pittsburgh, PA –

In a joint action, the Department of Environmental Protection (DEP) and the Pennsylvania Fish and Boat Commission (PFBC) have signed a consent assessment and settlement agreement (CASA) with CNX Gas Company LLC (CNX) to settle violations of the state's Oil and Gas Act and the Fish and Boat Code. As a result of the agreement, CNX will pay \$345,750 to DEP and \$105,000 to PFBC.

"Protecting the waters of the Commonwealth is a core function of both DEP and the PFBC and this agreement underscores the fact that, together, we take this responsibility very seriously, said Eric Gustafson, manager for Oil and Gas Operations in the Southwest Oil and Gas District Office. "We expect that operators will follow their WMP's and draw-down permits to the letter. DEP appreciates the assistance provided by the PFBC in resolving this case."

PFBC Executive Director John Arway added that "water is one of our most precious public resources, which must be protected and responsibly managed. DEP water management plans are engineered to ensure that water is allocated in proper amounts so that all water users can appropriately share the abundant supplies provided by our Commonwealth's streams, rivers and lakes. Non-compliance with the plans and permits could result in harm to other water users like aquatic life and public water supplies."

CNX did not adhere to its approved plan, and DEP determined it exceeded its approved daily withdrawal limits from a reservoir in North Franklin Township, Washington County on 43 days between October 23, 2011 and June 8, 2013.

In order for oil and gas operators to remove water from water sources in Pennsylvania for the drilling or stimulation of any unconventional natural gas well, a Water Management Plan (WMP) must be approved by DEP. The WMP designates the sources to be used, the peak daily withdrawal limits and the instantaneous withdrawal rates (how quickly water can be removed from the stream) to prevent impacts to the waterway. A number of different sources can be included in the WMP.

However, on 164 days between October 21, 2013 and December 23, 2014, during the restricted time period, CNX withdrew water from the reservoir contrary to the restrictions in their WMP and "draw down" permit. This water withdrawal resulted in low water levels within the reservoir, drying out the shallow shoreline areas of the reservoir and the surrounding forested wetlands.

In addition, the company failed to keep proper records relating to water withdrawals and reservoir levels.

CNX has instituted changes in their procedures to ensure that water withdrawal reporting is accurate and that WMPs are followed exactly.

For more information, visit www.dep.pa.gov (<http://www.dep.pa.gov/>) and www.fishandboat.com (<http://www.fishandboat.com/>)

MEDIA CONTACTS: John Poister, Department of Environmental Protection, 412-442-4203
Eric Levis, Pennsylvania Fish and Boat Commission, 717-705-7806

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<https://triblive.com/local/westmoreland/cnx-violated-state-law-in-operations-of-utica-well-that-lost-pressure-agency-says/?printerfriendly=true>

CNX violated state law in operations of Utica well that lost pressure, agency says



STEPHEN HUBA (<https://triblive.com/author/stephen-huba/>) [✉ \(mailto:shuba@tribweb.com\)](mailto:shuba@tribweb.com)

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Mon., February 25, 2019 3:41 p.m.

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DAN SPEICHER | TRIBUNE-REVIEW

Natural gas flares from a well below Beaver Run Reservoir along Route 380 in Bell Township on Tuesday, Feb. 5, 2019.

The state Department of Environmental Protection has issued a notice of violations to CNX Gas Co. for a Utica deep well in Washington Township that lost pressure during fracking operations in late January.

The notice cited CNX for "failure to construct and operate a well to ensure that the well integrity is maintained" and "failure to equip the well with casings of sufficient strength."

CNX believes an isolated "[casing integrity issue \(https://triblive.com/news/westmoreland/isolated-casing-issue-likely-caused-problems-at-gas-well-near-beaver-run-reservoir-company-reports/\)](https://triblive.com/news/westmoreland/isolated-casing-issue-likely-caused-problems-at-gas-well-near-beaver-run-reservoir-company-reports/)" about a mile underground was responsible for a significant drop in pressure at the Shaw 1G



near Beaver Run Reservoir during fracking Jan. 25-26. The pressure drop was accompanied by pressure increases at several nearby shallow oil and gas wells not owned by CNX — wells which were flared through Feb. 12.

CNX had successfully “killed” the problematic well by Feb. 4 by pumping heavy mud and cement into the well, essentially sealing it off.

All hydraulic fracturing operations on the Shaw pad remain suspended while CNX investigates the incident, which the DEP characterized as a “catastrophic loss of pressure” and a “well control emergency.” There are three Marcellus wells and four Utica wells on the pad, according to the DEP.

In addition to the violation, the DEP asked for the following information from CNX within 10 days of the notice:

- A detailed plan and schedule to conduct analysis/explanation of the root cause(s) of the failure(s) at the Shaw 1G well/casing that resulted in the loss of control of the well
- A timeline and description of actions taken by CNX from first becoming aware of the situation until CNX regained control of the well and secured the well, as well as any measures taken to ensure public safety
- A summary of corrective actions that CNX has implemented or plans to implement at all CNX well sites to prevent similar failures in the future
- A detailed explanation and plan that identifies resources, contractors and potential remedies to improve the response efficiency to similar events in the future
- The history of the Shaw 1G well since spudding.

CNX has informed the DEP that it intends to permanently plug the well.

“While our root cause analysis into the matter is ongoing, we continue to believe that the casing breach is isolated to this well. We are working with the department to provide the requested information,” CNX spokesman Brian Aiello said.



The Canonsburg company recently told investors that \$30 million of capital

expenditures related to the Shaw pad are included in the 2019 budget.



"The remaining three wells on the Shaw pad are not in the 2019 or 2020 carryover plan, but remain an opportunity for completion or (turn-in-line) in the near future," the company said.

The notice of violation does not constitute an enforcement action or the DEP's final evaluation of the incident.

"The department continues to receive information from CNX but does not have a timeline for the conclusion of its investigation," DEP spokeswoman Lauren Fraley said.

Stephen Huba is a Tribune-Review staff writer. You can contact Stephen at 724-850-1280, shuba@tribweb.com (mailto:shuba@tribweb.com) or via Twitter

(https://twitter.com/SHuba_trib).

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DECEMBER 28, 2017 | 03:00 PM

CNX Gas fined more than \$400,000 for drilling violations in Greene County

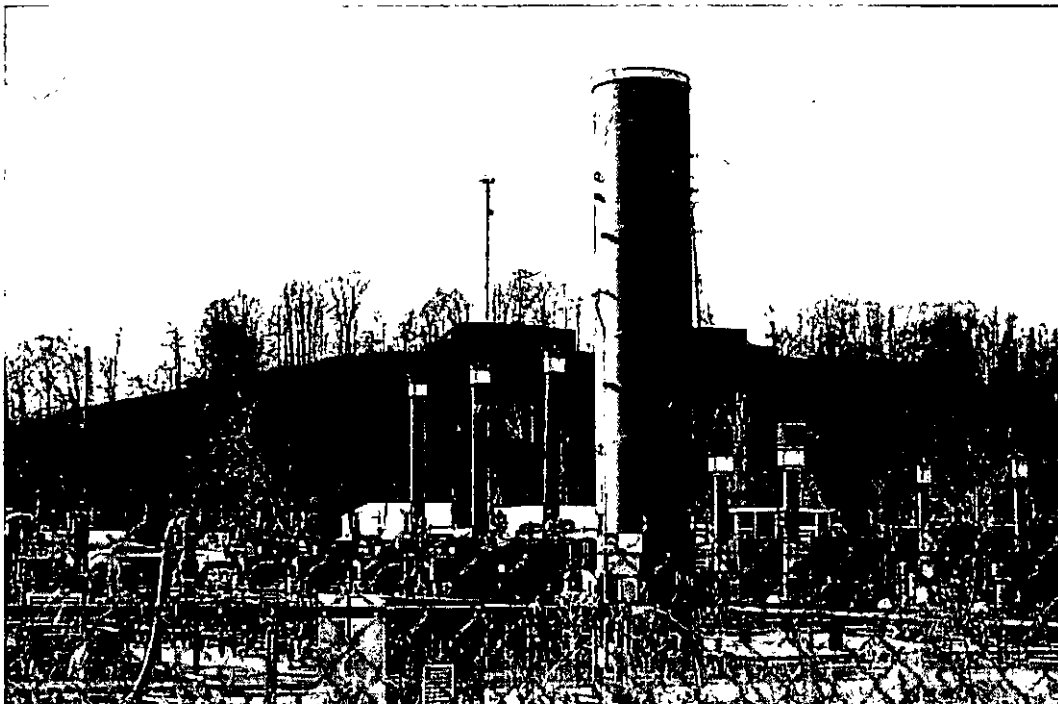
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Amy Sisk



< <https://stateimpact.npr.org/pennsylvania/files/2017/12/120117-Gas-Well-1.jpg> >

Amy Sisk / StateImpact Pennsylvania

A natural gas well site operates in southwestern Pennsylvania.

CNX Gas Co. has agreed to pay two fines to the Pennsylvania Department of Environmental Protection for drilling violations that took place in 2015 and 2016 in Greene County.

The penalties, totaling \$433,500, stem from incidents at four well sites that affected waterways and vegetation, according to the DEP.

The company failed to properly control and dispose of flowback and drilling fluids, and it did not take adequate steps to prevent erosion and sedimentation, among other violations, the department said in a news release.

The violations affected Jacobs Run and one of its tributaries, as well as groundwater in a special protection watershed.

“Two service companies were replaced as a direct result of actions that contributed to these incidents in late 2015 and early 2016,” CNX spokesperson Brian Aiello wrote in an email. “Upon discovery, CNX self-reported and worked closely with agency personnel on appropriate remediation steps.”

CNX has finished cleaning up the sites, the DEP said. The Canonsburg-based company operates 319 hydraulically fractured wells in Pennsylvania, half of which are in Greene County, according to DEP records.

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Pennsylvania fines CNX Gas for drilling violations

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🕒 January 3, 2018 ➔ Company News,
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The Pennsylvania Department of Environmental Protection has imposed a \$433,400 fine on CNX Gas for drilling violations at four well sites in Greene County, **Kallanish Energy** reports.

The state imposed a fine of \$241,000 for violation at the company's GH9AHSU and GH53BHS well sites, and \$192,400 for violations at the GH58HHS and GH46AHS well sites.

The penalties mark the completion of a long-term investigation by DEP, and are based on impacts to groundwater in a special protection watershed, high quality surface waters, including Jacobs Run and an unnamed tributary to Jacobs Run, and vegetation, as well as the severity of the violations, which occurred in 2015 and 2016.

The violations for which CNX was cited include:

- Failure to properly control, dispose and collect flowback and drilling fluids
- Failure to maintain containment during drilling and hydraulic fracturing activities
- Unauthorized disposal of residual waste

- Unauthorized discharge of industrial waste into the waters of the state
- Failure to maintain erosion and sedimentation best management practices (BMPs) in accordance with the associated permit
- Failure to implement effective BMPs to minimize erosion and sedimentation
- Failure to maintain alternate waste storage practices requested by CNX and approved by DEP.

Remediation at the well sites was completed and included cleanup of any soil, groundwater, and surface waters impacted by the spills in accordance with Pennsylvania rules and DEP's technical guidance documents.

Energy

Cover story: CNX 'all in' on newly formed midstream subsidiary

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The Majorsville CNX Midstream Compression Station.
JOE WOJCIK

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By Paul J. Gough -- Reporter, Pittsburgh Business Times
Feb 15, 2018, 2:00pm EST **Updated** Feb 21, 2018, 9:43am EST

It's been a long and sometimes frustrating ride for CNX Midstream, which was founded as Cone Midstream Partners in 2014 by what was then Consol Energy and Noble to hold its midstream assets.

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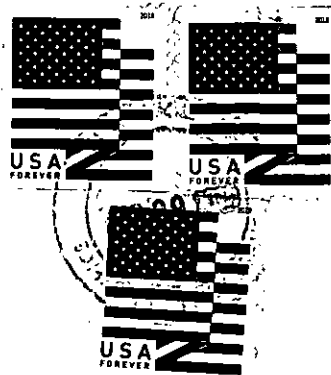
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