

ATTACHMENT 15

Operator	Inspection ID	Inspection Date	Inspection Type	API Permit	Farm Name	Unconventional	Site ID	Site Name	Facility Type	Inspection Category	County	Municipality	Inspector	Inspection Source	Inspection Result Description	Inspection Comment	Violation ID	Violation Date
PENNECO ENVIRONMENTAL SOLUTIONS LLC	3067473	#####	Routine/Complete Inspection	003-21223	SEDAT 3A	No	5993	SEDAT 3A WELL	Oil & Gas Location	Primary Facility	Allegheny	Plum Borough	STEINGRABE, SAMUEL	SAIR	Violation(s) Noted	On August 12, 2020, I conducted an inspection of the Sedat 3 UIC facility in Plum Boro, Allegheny County. The following was observed. The site entrance and access road were constructed and paved. The operator was actively conducting earth disturbance activity associated with the construction of the UIC Facility. I observed several sections of temporary ES BMP silt sox that did not appear to be properly installed. CFS-5, CFS-6, CFS-8 were not properly staked and missing filter media. CFS-8 was installed across the access road and appeared to have been run over by a vehicle. The operator has improperly installed CFS not indicated on the ES plan. The additional CFS was installed opposite of the job trailer on the east side of the project. Temporary BMPs CFS-1 and CFS-2 were not installed as indicated on the plan. Both sections of CFS were installed on the opposite side of the driveway. The operator was not utilizing the approved access road to access the spoil pile. According to the onsite contractor, the access road was not being utilized to protect the pavement on the access road. The operator has cut a large opening between the UIC facility and the stock pile area. Please provide an mapping overlay of the approved ES plan and the disturbed areas described above to be included with The Department was onsite the Penneco Environmental Solutions LLC Sedat 3A injection well to conduct a routine inspection. At time of inspection Operator was reconfiguring the injection line on the well head to allow wireline access. No gas was detected at or around the well, well was in good order and no violations were noted. Well was successfullv brought back online without issue	891613	8/12/2020
PENNECO ENVIRONMENTAL SOLUTIONS LLC	3415625	8/8/2022	Routine/Complete Inspection	003-21223	SEDAT 3A	No	5993	SEDAT 3A WELL	Oil & Gas Location	Primary Facility	Allegheny	Plum Borough	SHUB, JONATHAN	SUBSAIR	No Violations Noted	Administrative inspection related to Department inspection conducted on 8/12/2020 IR #3067473. On 8/25/2020, The Department received the Operator NOV response via electronic mail (attached).		
PENNECO ENVIRONMENTAL SOLUTIONS LLC	3408145	#####	Administrative/File Review	003-21223	SEDAT 3A	No	5993	SEDAT 3A WELL	Oil & Gas Location	Primary Facility	Allegheny	Plum Borough	STEINGRABE, SAMUEL	SAIR	In Compliance with Schedule	On August 12, 2020, I conducted an inspection of the Sedat 3 UIC facility in Plum Boro, Allegheny County. The following was observed. The site entrance and access road were constructed and paved.	891612	8/12/2020
PENNECO ENVIRONMENTAL SOLUTIONS LLC	3067473	#####	Routine/Complete Inspection	003-21223	SEDAT 3A	No	5993	SEDAT 3A WELL	Oil & Gas Location	Primary Facility	Allegheny	Plum Borough	STEINGRABE, SAMUEL	SAIR	Violation(s) Noted	The operator was actively conducting earth disturbance activity associated with the construction of the UIC Facility. I observed several sections of temporary ES BMP silt sox that did not appear to be properly installed. CFS-5, CFS-6, CFS-8 were not properly staked and missing filter media. CFS-8 was installed across the access road and appeared to have been run over by a vehicle. The operator has improperly installed CFS not indicated on the ES plan. The additional CFS was installed opposite of the job trailer on the east side of the project. Temporary BMPs CFS-1 and CFS-2 were not installed as indicated on the plan. Both sections of CFS were installed on the opposite side of the driveway. The operator was not utilizing the approved access road to access the spoil pile. According to the onsite contractor, the access road was not being utilized to protect the pavement on the access road. The operator has cut a large opening between the UIC facility and the stock pile area. Please provide an mapping overlay of the approved ES plan and the disturbed areas described above to be included with		

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78.53 - EROSION AND SEDIMENT CONTROL - Operator failed to design, implement and maintain best management practices and an erosion and sediment control plan in accordance with 25 Pa. Code Chapter 102, during and after earthmoving or soil disturbing activities, including the activities related to siting, drilling, completing, producing, servicing and plugging, constructing, utilizing and restoring the site and access road.	Environmental Health & Safety		11/5/2020	CRCTD - Corrected/Abated	N	387798	Notice of Violation	8/12/2020
102.4(b)1 - EROSION AND SEDIMENT CONTROL REQUIREMENTS - Person conducting earth disturbance activity failed to implement and maintain E & S BMPs to minimize the potential for accelerated erosion and sedimentation.	Environmental Health & Safety		11/5/2020	CRCTD - Corrected/Abated	N	387798	Notice of Violation	8/12/2020

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Penneco Environmental Solutions LLC	3033626	#####	Administrative/File Review	003-21223	SEDAT 3A	No	5993	SEDAT 3A WELL	Oil & Gas Location	Primary Facility	Allegheny	Plum Borough	Steingrabe, Samuel	SAIR	In Compliance with Schedule	<p>On May 18, 2020, I attended a pre-construction meeting conference call related to the Penneco Oil Sedat UIC disposal well in Plum Borough, Allegheny County. The meeting attendee's list is attached to this inspection.</p> <p>The Operator's third-party contractor Don Tron reviewed the construction sequence related to grading and excavation of the waste storage structure.</p> <p>The Operator indicated that a redline change was submitted to the Department regarding the use of a flexible steel pipe. The flexible pipe was proposed for use on the 4" steel casing inside of 8" steel secondary containment casing, Penneco is proposing to upgrade to 4" FlexSteel for the injection line and use 8" HDPE SDR17 as the secondary containment.</p> <p>PADEP April Weiland indicated the that request was received and is under review.</p> <p>Mr Jacobs indicated that this was the 7 day preconstruction notice and that Penneco is still awaiting a grading permit from the borough prior to commencing earth disturbance activities. Mr. Jacobs also indicated that Penneco will email the Department prior to starting construction.</p>		
Penneco Environmental Solutions LLC	3067473	#####	Routine/Complete Inspection	003-21223	SEDAT 3A	No	5993	SEDAT 3A WELL	Oil & Gas Location	Primary Facility	Allegheny	Plum Borough	Steingrabe, Samuel	SAIR	Violation(s) Noted	<p>The Operator indicated that that Keith McDowell On August 12, 2020, I conducted an inspection of the Sedat 3 UIC facility in Plum Boro, Allegheny County. The following was observed. The site entrance and access road were constructed and paved.</p> <p>The operator was actively conducting earth disturbance activity associated with the construction of the UIC Facility.</p> <p>I observed several sections of temporary ES BMP silt sox that did not appeared to be properly installed. CFS-5, CFS-6, CFS-8 were not properly staked and missing filter media. CFS-8 was installed across the access road and appeared to have been run over by a vehicle. The operator has improperly installed CFS not indicated on the ES plan. The additional CFS was installed opposite of the job trailer on the east side of the project.</p> <p>Temporary BMPs CFS-1 and CFS-2 were not installed as indicated on the plan. Both sections of CFS were installed on the opposite side of the driveway.</p> <p>The operator was not utilizing the approved access road to access the spoil pile. According to the onsite contractor, the access road was not being utilized to protect the pavement on the access road. The operator has cut a large opening between the UIC facility and the stock pile area. Please provide an mapping overlay of the approved ES plan and the disturbed areas described above to be included with</p>	891611	8/12/2020

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102.11(a)1 - GENERAL REQUIREMENTS of BMP AND DESIGN STANDARDS - Person failed to design, implement and maintain E & S BMPs to minimize the potential for accelerated erosion and sedimentation to protect, maintain, reclaim and restore water quality and existing and designated uses.	Environmental Health & Safety		11/5/2020	CRCTD - Corrected/Abated	N	387798	Notice of Violation	8/12/2020
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PENNECO ENVIRONMENTAL SOLUTIONS LLC	3067473	#####	Routine/Complete Inspection	003-21223	SEDAT 3A	No	5993	SEDAT 3A WELL	Oil & Gas Location	Primary Facility	Allegheny	Plum Borough	STEINGRABE, SAMUEL	SAIR	Violation(s) Noted	<p>On August 12, 2020, I conducted an inspection of the Sedat 3 UIC facility in Plum Boro, Allegheny County. The following was observed. The site entrance and access road were constructed and paved.</p> <p>The operator was actively conducting earth disturbance activity associated with the construction of the UIC Facility.</p> <p>I observed several sections of temporary ES BMP silt sox that did not appeared to be properly installed. CFS-5, CFS-6, CFS-8 were not properly staked and missing filter media. CFS-8 was installed across the access road and appeared to have been run over by a vehicle. The operator has improperly installed CFS not indicated on the ES plan. The additional CFS was installed opposite of the job trailer on the east side of the project.</p> <p>Temporary BMPs CFS-1 and CFS-2 were not installed as indicated on the plan. Both sections of CFS were installed on the opposite side of the driveway.</p> <p>The operator was not utilizing the approved access road to access the spoil pile. According to the onsite contractor, the access road was not being utilized to protect the pavement on the access road. The operator has cut a large opening between the UIC facility and the stock pile area. Please provide an mapping overlay of the approved ES plan and the disturbed areas described above to be included with On November 5, 2020, I conducted an inspection of the Sedat 3A UIC Surface Facility on Plum Borough, Allegheny County. The following was observed. The facility ID site was installed on the entrance gate.</p>	891614	8/12/2020
PENNECO ENVIRONMENTAL SOLUTIONS LLC	3105152	#####	Compliance Evaluation	003-21223	SEDAT 3A	No	5993	SEDAT 3A WELL	Oil & Gas Location	Primary Facility	Allegheny	Plum Borough	STEINGRABE, SAMUEL	SAIR	No Violations Noted	<p>The access road cut slope was showing limited vegetative growth. I recommend that the operator reseed and temporary stabilize the slope.</p> <p>The operator was in the process of pouring concrete walls at the UIC facility. The concrete washout location was installed on the north side of the location. The concrete washout out appeared to be in need of routine maintenance. I spoke with Operator representative Keith McDowell during the inspection. Mr. McDowell indicated that the south concrete wall would be installed after the tanks are set to allow for the installation of the tanks. Mr. McDowell also indicated that the precipitation accumulation within the facility was pumped to a filter bag on the south side of the location.</p> <p>The temporary ES BMPs appeared to be installed and maintained as per the ES plan and work appears to be within sequence. The operator was activity utilizing the stockpile location. The temporary ES BMPs were installed. The stockpile slopes were starting to show vegetative growth.</p> <p>No new violations observed during the inspection.</p>		

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OGA3216(B) - WELL SITE RESTORATIONS - PLAN - Failure to follow E&S control plan during and after earthmoving or soil disturbing activities.	Environmental Health & Safety		11/5/2020	CRCTD - Corrected/Abated	N	387798	Notice of Violation	8/12/2020

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PENNECO ENVIRONMENTAL SOLUTIONS LLC	3156778	#####	Routine/Complete Inspection	003-21223	SEDAT 3A	No	5993	SEDAT 3A WELL	Oil & Gas Location	Primary Facility	Allegheny	Plum Borough	STEINGRABE, SAMUEL	SAIR	No Violations Noted	On February 26, 2021, I conducted an inception at the Sedat 3A disposal well and facility in Plum Township, Allegheny County. On February 22, 2021 the Department was notified that a pressure test would be conducted on February 25, 2021. The Departments OGI inspected the facility on 2/25/2021 see inspection # 3152474 . I spoke with Penneco representative Keith McDowell during the inspection. At the time of inspection, the access road was constructed. I observed two locations along the cut slope of the access road where straw mulch was applied. No Slope failure or accelerated erosion was observed. The tank farm was constructed, and the operator was working the settling tanks and brine tank farm apparatus. The concrete containment appeared to be complete with the settling tanks and brine tanks installed. The pump room was constructed; however, the concrete unloading pad was not finished. Mr. McDowell indicated that the operator was waiting for better weather to pour the concrete offloading pad. The pad area was covered with plastic sheeting during the inspection. Mr. Dowell indicated that two temporary plastic lined offloading ponds were utilized to received disposal fluid utilized for the pressure test. The ponds were located near the settling tanks adjacent to the unfinished offloading pad. The operator was also working on the installation of various sections of underground electrical and on-Admin inspection in response to a water supply complaint and a phone call with Marc Jacobs of Penneco.		
PENNECO ENVIRONMENTAL SOLUTIONS LLC	3224342	#####	Administrative/File Review	003-21223	SEDAT 3A	No	5993	SEDAT 3A WELL	Oil & Gas Location	Primary Facility	Allegheny	Plum Borough	DEEMER, NICHOLAS	SAIR	Viol(s) Noted & Immediately Corrected	On 7/11/21, a water supply complaint was reported to the Department. In this complaint, the complainant mentions that a member of Penneco had already conducted sampling of the complainant's water supply. On 7/22/21, the Department spoke to Marc Jacobs (Penneco) via phone. Jacobs stated that he notified the EPA of the complaint, but did not notify the DEP. Per current regulations, a well operator who receives notice from a landowner, water purveyor, or affected person that a water supply has been affected by pollution or diminution, shall report receipt of notice from an affected person to the Department within 24 hours of receiving the notice. Violation is being issued under 25 PA CODE 78.51(h) for failure to report receipt of notice from an	924667	7/22/2021
PENNECO ENVIRONMENTAL SOLUTIONS LLC	3152474	#####	Routine/Complete Inspection	003-21223	SEDAT 3A	No	5993	SEDAT 3A WELL	Oil & Gas Location	Primary Facility	Allegheny	Plum Borough	FREESE, RICHARD	SUBSAIR	No Violations Noted	Penneco conducted a pressure test on the lines above and below ground. The pipes were pumped up to 1,500 pounds and over ten hours they lost 100 pounds. Penneco believes some of the loss was due to extreme temperature change (66 degrees dropping to 28 degrees).		
PENNECO ENVIRONMENTAL SOLUTIONS LLC	3415655	8/8/2022	Routine/Complete Inspection	003-21210	SEDAT 1A	No	5980	SEDAT 1A WELL	Oil & Gas Location	Primary Facility	Allegheny	Plum Borough	SHUB, JONATHAN	SUBSAIR	No Violations Noted	The well is in good conditions. The Department was onsite the Penneco Environmental Solutions LLC Sedat #1A monitoring well (003-21210) to conduct a routine inspection. Well is in good order and no violations were observed. The well is fitted with a casing head vent by design and is functioning as intended. Inside of the vent tube gas was detected at 38% LEL with a peak of 78% LEL using a Bascom-Turner gas detector. No gas was detected outside of the casing head		

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78.51(h) - PROTECTION OF WATER SUPPLIES - Well operator failed to notify the Department within 24 hours of receiving notification from a landowner, water purveyor, or affected person that a water supply has been affected by pollution or diminution.	Administrative				N	396624	Notice of Violation	7/22/2021
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PENNECO ENVIRONMENTAL SOLUTIONS LLC	3415611	#####	Routine/Complete Inspection	003-21644	SEDAT 4A	No	630393	SEDAT 4A OG WELL	Oil & Gas Location	Primary Facility	Allegheny	Plum Borough	SHUB, JONATHAN	SUBSAIR	No Violations Noted	<p>The department was onsite the Penneco Sedat 4A well (003-21644) to conduct a routine inspection. This is an active producing gas well. Well is intact and in generally good condition, well shows some minor corrosion (surface rust) and flaking paint. The well has minor thread leakage of gas (0.5%) in a few spots that is not uncommon in wells of this age. 4 1/2" x 7" casing annulus is venting gas by design and was measured at 51% gas.</p> <p>Recommend operator check fittings for tightness and seal.</p> <p>Recommend operator install vertical vent pipe from casing head port</p>		
PENNECO ENVIRONMENTAL SOLUTIONS LLC	2678155	1/4/2018	Routine/Complete Inspection	003-21223	SEDAT 3A	No	5993	SEDAT 3A WELL	Oil & Gas Location	Primary Facility	Allegheny	Plum Borough	STEINGRABE, SAMUEL	SAIR	No Violations Noted	Well drilled and equipped for production. Well tag present. Well apparatus appears to be in sound condition.		
PENNECO ENVIRONMENTAL SOLUTIONS LLC	3415642	8/8/2022	Routine/Complete Inspection	003-21222	SEDAT 2A	No	5992	SEDAT 2A WELL	Oil & Gas Location	Primary Facility	Allegheny	Plum Borough	SHUB, JONATHAN	SUBSAIR	No Violations Noted	<p>The Department was onsite the Penneco Environmental Solutions Sedat 2A (003-21222) gas well to conduct a routine inspection. Well shows light corrosion (rust) and flaking paint typical of wells located in this climate. Well has a pressure gauge attached to the 4 1/2" x 2" casing head port. Pressure at the gauge was 190 psi. 7" x 4" casing head port was serving as a vent by design and functioning as intended. Gas was detected at the mouth of the port (0-10% LEL) and inside the vent (5% Gas, Peak 8%).</p>		
PENNECO ENVIRONMENTAL SOLUTIONS LLC	3229929	#####	Routine/Partial Inspection	003-21223	SEDAT 3A	No	5993	SEDAT 3A WELL	Oil & Gas Location	Primary Facility	Allegheny	Plum Borough	STEINGRABE, SAMUEL	SAIR	No Violations Noted	<p>On July 14, 2021, I conducted a site inspection of the Sedat 3A disposal well site in Plum Boro, Allegheny County. I was accompanied by DEP Jessica Hirsch and OGI Jonathan Shub and Operator representative Keith McDowell. The following observed</p> <p>The construction of the surface facility, access road, and offloading area appeared to be complete. The PCSM feature was constructed. The disturbed areas showed sign of vegetative growth.</p> <p>I observed staining on the bottom of the off-loading secondary containment area adjacent to the offloading pad. The staining appeared to emanating from the off-load area. The area appeared to be completely contained with the secondary containment.</p> <p>Mr. McDowell and Mr. Shub discussed recently updated flexible fittings associated of the disposal and injection string. The fitting would created a better connecting and resist vibration better that the current fitting.</p>		

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PENNECO ENVIRONMENTAL SOLUTIONS LLC	3067473	#####	Routine/Complete Inspection	003-21223	SEDAT 3A	No	5993	SEDAT 3A WELL	Oil & Gas Location	Primary Facility	Allegheny	Plum Borough	STEINGRABE, SAMUEL	SAIR	Violation(s) Noted	<p>On August 12, 2020, I conducted an inspection of the Sedat 3 UIC facility in Plum Boro, Allegheny County. The following was observed. The site entrance and access road were constructed and paved.</p> <p>The operator was actively conducting earth disturbance activity associated with the construction of the UIC Facility.</p> <p>I observed several sections of temporary ES BMP silt sox that did not appeared to be properly installed. CFS-5, CFS-6, CFS-8 were not properly staked and missing filter media. CFS-8 was installed across the access road and appeared to have been run over by a vehicle. The operator has improperly installed CFS not indicated on the ES plan. The additional CFS was installed opposite of the job trailer on the east side of the project.</p> <p>Temporary BMPs CFS-1 and CFS-2 were not installed as indicated on the plan. Both sections of CFS were installed on the opposite side of the driveway.</p> <p>The operator was not utilizing the approved access road to access the spoil pile. According to the onsite contractor, the access road was not being utilized to protect the pavement on the access road. The operator has cut a large opening between the UIC facility and the stock pile area. Please provide an mapping overlay of the approved ES plan and the disturbed areas described above to be included with</p>	891615	8/12/2020

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102.4(b)2 - EROSION AND SEDIMENT CONTROL REQUIREMENTS - Person conducting earth disturbance activity failed to develop and implement a required written E & S Plan.	Environmental Health & Safety		11/5/2020	CRCTD - Corrected/Abated	N	387798	Notice of Violation	8/12/2020