

County: All; Municipality: All; Region: All; Operator: JKLM ENERGY LLC (308463); Unconventional Only: No
Resolved Violations Only: No; Inspections With Violations Only: Yes; Inspection Category: All

Inspections from 1/1/2010 to 3/16/2018

Operator: JKLM ENERGY LLC - Inspections: 20; Inspections With Violations: 20; Violations: 56; Enforcements: 14; Wells Inspected: 5

INSPECTION ID	INSPECTION CLIENT NAME	INSPECTION DATE	INSPECTION TYPE	API / PERMIT	FARM NAME	UNCONVENTIONAL	SITE ID / NAME	FACILITY TYPE	INSPECTION CATEGORY	REGION	COUNTY	MUNICIPALITY	INSPECTOR	INSPECTION SOURCE	INSPECTION RESULT DESCRIPTION	INSPECTION COMMENT
2377498	JKLM ENERGY LLC	06/09/2015	Routine/Complete Inspection	105-21850	SWEDEN VALLEY 102 3HU	Yes	740232 - SWEDEN VALLEY 102 PAD EXPANSION	Oil & Gas Location	Primary Facility	EP DOGO NCDO Dstr Off	Potter	Summit Twp	VANFLEET, SEAN	EFACTS	Violation(s) Noted	

Violation Details

VIOLATION ID	VIOLATION DATE	VIOLATION CODE & DESCRIPTION	VIOLATION TYPE	VIOLATION COMMENT	RESOLVED DATE	RESOLUTION REASON CODE & DESCRIPTION	CONTINUING VIOLATION	RELATED ENFORCEMENTS
725183	06/09/2015	78.55(a) - CONTROL AND DISPOSAL PLANNING - Operator failed to prepare and implement a plan under 25 Pa. Code Section 91.34 for the control and disposal of fluids, residual waste and drill cuttings, including tophole water, brines, drilling fluids, additives, drilling muds, stimulation fluids, well servicing fluids, oil, and production fluids from the drilling, alteration, production, plugging or other activity associated with oil and gas wells.	Administrative	PPC plan not submitted to the Department prior to generation of waste	06/16/2015	CRCTD - Corrected/Abated		324924
725185	06/09/2015	78.55(f)5v - EMERGENCY RESPONSE FOR UNCONVENTIONAL WELL SITES - Failure of the unconventional well operator to submit a copy of the emergency response plan and subsequent updates to PEMA, the Department, county emergency agency and the Public Safety answering point.	Administrative	Operator has not submitted either a company-wide or site-specific ER Plan	06/16/2015	CRCTD - Corrected/Abated		324924

Enforcement Details

ENFORCEMENT ID	ENFORCEMENT CODE & DESCRIPTION	EXECUTED ENFORCEMENT DATE	ENFORCEMENT FINAL DATE	ENFORCEMENT FINAL STATUS	PENALTY FINAL DATE	PENALTY FINAL STATUS CODE & DESCRIPTION	PENALTY AMOUNT	TOTAL AMOUNT COLLECTED	RELATED VIOLATIONS
324924	NOV - Notice of Violation	06/10/2015	07/02/2015	Comply/Closed					725183 725185

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2386000	JKLM ENERGY LLC	06/29/2015	Incident-Response to Accident or Event	105-21850	SWEDEN VALLEY 102 3HU	Yes	740232 - SWEDEN VALLEY 102 PAD EXPANSION	Oil & Gas Location	Primary Facility	EP DOGO NCDO Dstr Off	Potter	Summit Twp	TOKARZ, TERRA	EFACTS	Violation(s) Noted	Incident inspection to document release of an estimated 275 gallons of phosphonic acid. Release occurred when a tote of anti-corrosion agent was punctured. Release cleanup and mitigation was initiated shortly after the release was discovered. TLT

Violation Details

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727372	06/29/2015	CSL 402(b) - POTENTIAL POLLUTION - Conducting an activity regulated by a permit issued pursuant to Section 402 of The Clean Streams Law to prevent the potential of pollution to waters of the Commonwealth without a permit or contrary to a permit issued under that authority by the Department.	Environmental Health & Safety	CSL 402. An estimated 275 gallons of phosphonic acid was released when a tote of anti-corrosion agent was punctured. The acid was released into containment. The containment was breached due to a hole, which was discovered during the spill response. Steady rain on 6/27/15 mobilized the phosphonic acid causing it to migrate to the northeast pad corner and down the fill slope. TLT	06/10/2016	CRCTD - Corrected/Abated		325308
727373	06/29/2015	OGA3218.2(A) - Failure to design and construct unconventional well site to prevent spills to the ground surface and off well site.	Environmental Health & Safety	An estimated 275 gallons of phosphonic acid was released when a tote of anti-corrosion agent was punctured. The acid was released into containment. The containment was breached due to a hole, which was discovered during the spill response. Steady rain on 6/27/15 mobilized the phosphonic acid causing it to migrate to the northeast pad corner and down the fill slope. TLT	06/10/2016	CRCTD - Corrected/Abated		325308

Enforcement Details

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325308	NOV - Notice of Violation	07/09/2015	06/10/2016	Comply/Closed					727373 727372

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2392130	JKLM ENERGY LLC	07/13/2015	Incident-Response to Accident or Event	105-21850	SWEDEN VALLEY 102 3HU	Yes	740232 - SWEDEN VALLEY 102 PAD EXPANSION	Oil & Gas Location	Primary Facility	EP DOGO NCDO Dstr Off	Potter	Summit Twp	TOKARZ, TERRA	EFACTS	Violation(s) Noted	Inspection to document 63 gal calcium chloride release reported 7/7/15, which had been cleaned up. While on site, evidence of a new release was observed along the east side of the pad. Multiple damp areas on pad surface immediately adjacent to the containment. Containment nearly full with high conductivity fluid. Two samples collected. Sample results confirm polluttional substance on pad surface. TLT

Violation Details

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730453	07/13/2015	CSL 402(b) - POTENTIAL POLLUTION - Conducting an activity regulated by a permit issued pursuant to Section 402 of The Clean Streams Law to prevent the potential of pollution to waters of the Commonwealth without a permit or contrary to a permit issued under that authority by the Department.	Environmental Health & Safety	CSL 402 for the potential to pollute Waters of the Commonwealth. Purpose of the inspection was to document a 63 gal calcium chloride release reported 7/7/15, which had been cleaned up. While on site, evidence of a new release was observed along the east side of the pad. Observed multiple damp areas on pad surface immediately adjacent to the containment. Containment nearly full with high conductivity fluid. Two samples collected. Sample results confirm polluttional substance on pad surface. TLT	06/10/2016	CRCTD - Corrected/Abated		327703
730454	07/13/2015	78.54 - GENERAL REQUIREMENTS - Operator failed to control and dispose of fluids, residual waste and drill cuttings, including tophole water, brines, drilling fluids, drilling muds, stimulation fluids, well servicing fluids, oil, and production fluids in a manner that prevents pollution of the waters of the Commonwealth.	Environmental Health & Safety	78.54 for failure to control and dispose of fluids, residual waste and drill cuttings, including tophole water, brines, drilling fluids, drilling muds, stimulation fluids, well servicing fluids, oil, and production fluids in a manner that prevents pollution of the Waters of the Commonwealth. Purpose of the inspection was to document a 63 gal calcium chloride release reported 7/7/15, which had been cleaned up. While on site, evidence of a new release was observed along the east side of the pad. Observed multiple damp areas on pad surface immediately adjacent to the containment. Containment nearly full with high conductivity fluid. Two samples collected. Sample results confirm polluttional substance on pad surface. TLT	06/10/2016	CRCTD - Corrected/Abated		327703
730455	07/13/2015	SWMA301 - Failure to properly store, transport, process or dispose of a residual waste.	Environmental Health & Safety	SWMA 301 for failure to properly store, transport, process or dispose of a residual waste. Purpose of the inspection was to document a 63 gal calcium chloride release reported 7/7/15, which had been cleaned up. While on site, evidence of a new release was observed along the east side of the pad. Observed multiple damp areas on pad surface immediately adjacent to the containment. Containment nearly full with high conductivity fluid. Two samples collected. Sample results confirm polluttional substance on pad surface. TLT	06/10/2016	CRCTD - Corrected/Abated		327703
730456	07/13/2015	OGA3218.2(A) - Failure to design and construct unconventional well site to prevent spills to the ground surface and off well site.	Environmental Health & Safety	OGA 3218.2(a). Failure to design and construct unconventional well site to prevent spills to the ground surface and off well site. The containment was not suffieciently impervious and able to contain the spilled material. Purpose of the inspection was to document a 63 gal calcium chloride release reported 7/7/15, which had been cleaned up. While on site, evidence of a new release was observed along the east side of the pad. Observed multiple damp areas on pad surface immediately adjacent to the containment. Containment nearly full with high conductivity fluid. Two samples collected. Sample results confirm polluttional substance on pad surface. TLT	06/10/2016	CRCTD - Corrected/Abated		327703

Enforcement Details

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327703	NOV - Notice of Violation	07/24/2015	06/10/2016	Comply/Closed					730456 730455 730453 730454

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2398832	JKLM ENERGY LLC	08/17/2015	Administrative/ File Review						Client	EP Bur Oil Gas Plng Prgm Mgmt			DIGILARMO, JENNIFER	EFACTS	Violation(s) Noted	

Violation Details

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732605	08/17/2015	ACT173 - Failure to file monthly unconventional production data with the Department within 45 days after the close of the reporting period.	Administrative	june 2015	01/12/2016	CRCTD - Corrected/Abated		328640

Enforcement Details

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328640	NOV - Notice of Violation	08/17/2015	01/12/2016	Comply/Closed					732605

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2411586	JKLM ENERGY LLC	09/30/2015	Administrative/ File Review	105-21852	REESE HOLLOW 118 2HU	Yes	791072 - REESE HOLLOW WELL PAD 118 OG ESCGP	Oil & Gas Location	Primary Facility	EP DOGO NCDO Dstr Off	Potter	Sweden Twp	MEANS, JENNIFER	EFACTS	Violation(s) Noted	Admin inspection record for purpose of entering NOV (Enf 330037)

Violation Details

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735807	09/30/2015	78.73(a) - GENERAL PROVISION FOR WELL CONSTRUCTION AND OPERATION - Operator failed to construct and operate the well in accordance with 25 Pa. Code Chapter 78 and ensure that the integrity of the well is maintained and health, safety, environment and property are protected.	Environmental Health & Safety	Closed 10/21/16 with COA execution (Enf 348051)	10/21/2016	ATE - Addressed Through Enforcement		330037 348051
735808	09/30/2015	78.73(b) - GENERAL PROVISION FOR WELL CONSTRUCTION AND OPERATION - Operator failed to prevent gas, oil, brine, completion and servicing fluids, and any other fluids or materials from below the casing seat from entering fresh groundwater, and prevent pollution or diminution of fresh groundwater.	Environmental Health & Safety	Closed 10/21/16 with COA execution (Enf 348051)	10/21/2016	ATE - Addressed Through Enforcement		330037 348051
735809	09/30/2015	78.83__(c) - CASING AND CEMENTING - SURFACE AND COAL PROTECTIVE CASING AND CEMENTING PROCEEDURES - The surface hole was not drilled using air, freshwater or freshwater-based drilling fluid.	Environmental Health & Safety	Citation of 78.83(c) for drilling the tophole with an unapproved surfactant. Closed 10/21/16 with COA execution (Enf 348051)	10/21/2016	ATE - Addressed Through Enforcement		348051 330037
735810	09/30/2015	CSL 401 - PROHIBITION AGAINST OTHER POLLUTIONS - Discharged substance of any kind or character resulting in pollution of Waters of the Commonwealth.	Environmental Health & Safety	Discharge of drilling additive to groundwater, affecting private water supplies. Closed 10/21/16 with COA execution (Enf 348051)	10/21/2016	ATE - Addressed Through Enforcement		348051 330037

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330037	NOV - Notice of Violation	09/30/2015	10/21/2016	Administrative Close Out					735807
									735808
									735810
									735809
348051	COA - Consent Order and Agreement	10/21/2016			10/31/2016	COMP - Completed	\$472,317	\$472,317	735807
									735810
									735809
									735808

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2411802	JKLM ENERGY LLC	09/22/2015	Complaint Inspection	105-21852	REESE HOLLOW 118 2HU	Yes	791072 - REESE HOLLOW WELL PAD 118 OG ESCGP	Oil & Gas Location	Primary Facility	EP DOGO NCDO Dstr Off	Potter	Sweden Twp	TAYLOR, LESTER	EFACTS	Violation(s) Noted	Unapproved drilling additive (s) used to drill tophole

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735826	09/22/2015	78.73(a) - GENERAL PROVISION FOR WELL CONSTRUCTION AND OPERATION - Operator failed to construct and operate the well in accordance with 25 Pa. Code Chapter 78 and ensure that the integrity of the well is maintained and health, safety, environment and property are protected.	Environmental Health & Safety	Violations superceded by violations in Admin inspection 2411586 and associated NOV (Enf 330037) issued 9/30/2015	09/30/2015	SPRCD - Superceded		
735827	09/22/2015	78.73(b) - GENERAL PROVISION FOR WELL CONSTRUCTION AND OPERATION - Operator failed to prevent gas, oil, brine, completion and servicing fluids, and any other fluids or materials from below the casing seat from entering fresh groundwater, and prevent pollution or diminution of fresh groundwater.	Environmental Health & Safety	Violations superceded by violations in Admin inspection 2411586 and associated NOV (Enf 330037) issued 9/30/2015	09/30/2015	SPRCD - Superceded		
735828	09/22/2015	78.83(c) - CASING AND CEMENTING - SURFACE AND COAL PROTECTIVE CASING AND CEMENTING PROCEEDURES - Operator failed to drill to approximately 50 feet below the deepest fresh groundwater or at least 50 feet into consolidated rock, whichever is deeper, and immediately set and permanently cement a string of surface casing to that depth.	Environmental Health & Safety	Violations superceded by violations in Admin inspection 2411586 and associated NOV (Enf 330037) issued 9/30/2015	09/30/2015	SPRCD - Superceded		

No Related Enforcements

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2483765	JKLM ENERGY LLC	05/10/2016	Administrative/ File Review	105-21850	SWEDEN VALLEY 102 3HU	Yes	740232 - SWEDEN VALLEY 102 PAD EXPANSION	Oil & Gas Location	Primary Facility	EP DOGO NCDO Dstr Off	Potter	Summit Twp	TOKARZ, TERRA	EFACTS	Outstanding Violations - Viols Req'd	Admin inspection to review the Site Inspection and Soil Sampling Report provided by JKLM. Report summarizes JKLM's investigation of an area that exhibited elevated soil/water conductivity, as found during DEP's 4/8/16 inspection. Based upon the results of DEP's sample collected on 4/8/16, a violation is cited against the 3HU well. The violation is immediately corrected as JKLM recovered the water as soon as being made aware. The 6/29/15 and 7/13/15 violations against the 3HU remain outstanding and will be resolved upon receipt and review of the Remedial Action Completion Reports. TLT

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759168	05/10/2016	CSL 402(b) - POTENTIAL POLLUTION - Conducting an activity regulated by a permit issued pursuant to Section 402 of The Clean Streams Law to prevent the potential of pollution to waters of the Commonwealth without a permit or contrary to a permit issued under that authority by the Department.	Environmental Health & Safety	35 P.S. 691.402(b) for causing or allowing an unpermitted discharge with the potential to pollute Waters of the Commonwealth. An area was observed adjacent to a glycol unit that exhibited elevated soil conductivity. Poned water was also screened for conductivity and a sample collected. Sample results showed chloride and total dissolved solids concentrations above standards. JKLM immediately recovered the water, correcting the violation. In addition, JKLM initiated an investigation, including screening and sampling of the area. TLT	05/10/2016	CRCTD - Corrected/Abated		

No Related Enforcements

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2555469	JKLM ENERGY LLC	01/25/2017	Routine/Complete Inspection	105-21861	HEADWATER S 143 5HU	Yes	810846 - HEADWATERS PAD 143 OG ESCGP	Oil & Gas Location	Primary Facility	EP DOGO NCDO Dstr Off	Potter	Ulysses Twp	VANFLEET, SEAN	EFACTS	Violation(s) Noted	

Violation Details

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777325	01/25/2017	OGA3218.2(A) - Failure to design and construct unconventional well site to prevent spills to the ground surface and off well site.	Environmental Health & Safety		02/01/2017	CRCTD - Corrected/Abated		357668 350516

Enforcement Details

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350516	NOV - Notice of Violation	01/27/2017	02/01/2017	Comply/Closed					777325
357668	CACP - Consent Assessment of Civil Penalty	09/05/2017	09/05/2017	Comply/Closed	09/05/2017	COMP - Completed	\$18,000	\$18,000	777325

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2568435	JKLM ENERGY LLC	03/06/2017	Administrative/File Review	105-21861	HEADWATER S 143 5HU	Yes	810846 - HEADWATERS PAD 143 OG ESCGP	Oil & Gas Location	Primary Facility	EP DOGO NCDO Dstr Off	Potter	Ulysses Twp	VANFLEET, SEAN	EFACTS	Violation(s) Noted	

Violation Details

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779934	03/06/2017	78a54 - GENERAL REQUIREMENTS - Operator failed to control and dispose of fluids, residual waste and drill cuttings, including tophole water, brines, drilling fluids, drilling muds, stimulation fluids, well servicing fluids, oil, and production fluids in a manner that prevents pollution of the waters of the Commonwealth and in accordance with 25 Pa. Code §§ 78a.55 – 78a.58 and 78a.60 – 78a.63.	Environmental Health & Safety		09/05/2017	ACO - Administrative Close Out		357668
								351459
779935	03/06/2017	91.33(A) - INCIDENTS CAUSING OR THREATENING POLLUTION - Failure to notify the Department of an accident or other activity or incident, a toxic substance or another substance which would endanger downstream users of the waters, result in pollution or create a danger of pollution of the waters of this Commonwealth, or would damage property.	Environmental Health & Safety		09/05/2017	ACO - Administrative Close Out		357668
								351459
779936	03/06/2017	SWMA 301 - Failure to properly store, transport, process or dispose of a residual waste.	Environmental Health & Safety		09/05/2017	ACO - Administrative Close Out		351459
								357668
779937	03/06/2017	CSL 402(b) - POTENTIAL POLLUTION - Conducting an activity regulated by a permit issued pursuant to Section 402 of The Clean Streams Law to prevent the potential of pollution to waters of the Commonwealth without a permit or contrary to a permit issued under that authority by the Department.	Environmental Health & Safety		09/05/2017	ACO - Administrative Close Out		351459
								357668

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351459	NOV - Notice of Violation	03/06/2017	09/05/2017	Administrative Close Out					779936
									779937
									779935
									779934
357668	CACP - Consent Assessment of Civil Penalty	09/05/2017	09/05/2017	Comply/Closed	09/05/2017	COMP - Completed	\$18,000	\$18,000	779934
									779935
									779936
									779937

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2570228	JKLM ENERGY LLC	03/08/2017	Routine/Complete Inspection				815261 - REESE HOLLOW 117 CONNECTOR OG ESGP		Site	EP DOGO NCDO Dstr Off			TOKARZ, TERRA	SAIR	Violation(s) Noted	<p>On 3/8/17 at 1140 hrs I conducted a routine inspection of the Reese Hollow 117 Connector pipeline project. It was mostly sunny, windy and 40 degrees F. No one was present at the site during the inspection.</p> <p>The pipeline was constructed last summer and fall. The pipeline connects the Reese Hollow 117 well pad to the YM-52 meter station. As shown in the E&S plan, the pipeline is 6,700 feet in length and total disturbance is 10.16 acres.</p> <p>I observed the entire length of the pipeline project. It was apparent that topsoil had been spread recently from near station 4+00 to</p>

about station 24+00. It appeared that a large portion of the line (from 24+00 - 50+00) had been covered with topsoil at some earlier date and had been idle for some time. There was no evidence that this section of the line had been temporarily stabilized following cessation of the earth disturbance work. This constitutes violations of 25 Pa Code Section 102.4(b)(1) and 25 Pa Code Section 102.22(b)(1). Mulch was observed on the ROW near the terminus of the project from near station 50+00 - 64+00. Waterbars and perimeter E&S controls were observed in place.

The E&S plan was maintained in the mailbox, which is located near the Reese Hollow 117 well pad. However, there was no documentation at the site to show that routine E&S inspections were being conducted of the pipeline project. This is a violation of 25 Pa Code Section 102.4(b)(8).

Following the inspection, I contacted JKLM representative, Scott Blauvelt and made him aware of my observations.

I concluded the inspection at 1329 hrs. TLT

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780347	03/08/2017	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	Idle portions of the pipeline right-of-way were not stabilized with mulch or erosion control blanket as indicated in the E&S plan. 4/5/17: ROW temporarily stabilized on 3/13/17. NOV response received 3/24/17.	04/05/2017	CRCTD - Corrected/Abated		351580
780348	03/08/2017	102.22(b)1 - SITE STABILIZATION – TEMPORARY STABILIZATION – Permittee failed to temporarily stabilize the site to protect it from accelerated erosion and sedimentation where cessation of earth disturbance activities exceeded 4 days.	Environmental Health & Safety	Inactive portions of the pipeline project were not temporarily stabilized. 4/5/17: ROW temporarily stabilized on 3/13/17. NOV response received 3/24/17.	04/05/2017	CRCTD - Corrected/Abated		351580
780349	03/08/2017	102.4(b)8 - EROSION AND SEDIMENT CONTROL REQUIREMENTS – E & S plan, inspection reports and monitoring records were not available at the project site during all stages of earth disturbance activity.	Administrative	Operator failed to conduct routine E&S inspections of the pipeline project and to maintain documentation of the routine inspections at the project site. 4/5/17: Log book is now maintained in mailbox and documents that E&S inspections have been conducted weekly since 3/9/17.	04/05/2017	CRCTD - Corrected/Abated		351580

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351580	NOV - Notice of Violation	03/10/2017	04/06/2017	Comply/Closed					780349 780347 780348

INSPECTION ID	INSPECTION CLIENT NAME	INSPECTION DATE	INSPECTION TYPE	API / PERMIT	FARM NAME	UNCONVENTIONAL	SITE ID / NAME	FACILITY TYPE	INSPECTION CATEGORY	REGION	COUNTY	MUNICIPALITY	INSPECTOR	INSPECTION SOURCE	INSPECTION RESULT DESCRIPTION	INSPECTION COMMENT
2570380	JKLM ENERGY LLC	03/08/2017	Routine/Complete Inspection				817185 - REESE HOLLOW 115 GATHERING LINE OG ESGP		Site	EP DOGO NCDO Dstr Off			TOKARZ, TERRA	SAIR	Violation(s) Noted	On 3/8/17 at 1333 hrs I conducted a routine inspection of the Reese Hollow 115 Gathering Line project. It was partly sunny, windy and 46 degrees F. Hillsdale Construction and Excavating Co., Inc. was present at the site.

The pipeline was constructed last fall. The pipeline connects the Reese Hollow 115 well pad to the Reese Hollow 117 Connector pipeline project. As shown in the E&S plan, the pipeline is 6,123 feet in length and total disturbance is 7.26 acres.

At the time of my inspection, Hillsdale had begun spreading the stockpiled topsoil on the right-of-way (ROW) from the beginning of the project (station 46+82) to near station 73+00. The remainder of the pipeline had not yet been reclaimed. There was no evidence that the unreclaimed portion of the pipeline (from near 73+00 - 108+00) had been temporarily stabilized following cessation of earth disturbance work. This constitutes violations of 25 Pa Code Section 102.4 (b) (1) and 25 Pa Code Section 102.22(b)(1). Perimeter E&S controls were observed in place.

The E&S plan was maintained in the mailbox, which is located near the Reese Hollow 115 well pad. However, there was no documentation at the site to show that routine E&S inspections were being

conducted of the pipeline project. This is a violation of 25 Pa Code 102.4(b)(8).

Following the inspection, I contacted JKLM representative, Scott Blauvelt and made him aware of my observations.

I concluded the inspection at 1417 hrs. TLT

Violation Details

VIOLATION ID	VIOLATION DATE	VIOLATION CODE & DESCRIPTION	VIOLATION TYPE	VIOLATION COMMENT	RESOLVED DATE	RESOLUTION REASON CODE & DESCRIPTION	CONTINUING VIOLATION	RELATED ENFORCEMENTS
780389	03/08/2017	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	Idle portions of the pipeline right-of-way were not stabilized with mulch or erosion control blanket as indicated in the E&S plan. 4/5/17: ROW temporarily stabilized on 3/13/17. NOV response received 3/24/17.	04/05/2017	CRCTD - Corrected/Abated		351588
780390	03/08/2017	102.4(b)8 - EROSION AND SEDIMENT CONTROL REQUIREMENTS – E & S plan, inspection reports and monitoring records were not available at the project site during all stages of earth disturbance activity.	Administrative	Routine E&S inspections were not conducted as required and documentation of any inspections that may have been conducted was not maintained on site. 4/5/17: Log book is now maintained in mailbox and documents that E&S inspections have been conducted weekly since 3/9/17.	04/05/2017	CRCTD - Corrected/Abated		351588
780391	03/08/2017	102.22(b)1 - SITE STABILIZATION – TEMPORARY STABILIZATION – Permittee failed to temporarily stabilize the site to protect it from accelerated erosion and sedimentation where cessation of earth disturbance activities exceeded 4 days.	Environmental Health & Safety	Inactive portions of the pipeline project were not temporarily stabilized. 4/5/17: ROW temporarily stabilized on 3/13/17. NOV response received 3/24/17.	04/05/2017	CRCTD - Corrected/Abated		351588

Enforcement Details

ENFORCEMENT ID	ENFORCEMENT CODE & DESCRIPTION	EXECUTED ENFORCEMENT DATE	ENFORCEMENT FINAL DATE	ENFORCEMENT FINAL STATUS	PENALTY FINAL DATE	PENALTY FINAL STATUS CODE & DESCRIPTION	PENALTY AMOUNT	TOTAL AMOUNT COLLECTED	RELATED VIOLATIONS
351588	NOV - Notice of Violation	03/10/2017	04/06/2017	Comply/Closed					780391 780390 780389

INSPECTION ID	INSPECTION CLIENT NAME	INSPECTION DATE	INSPECTION TYPE	API / PERMIT	FARM NAME	UNCONVENTIONAL	SITE ID / NAME	FACILITY TYPE	INSPECTION CATEGORY	REGION	COUNTY	MUNICIPALITY	INSPECTOR	INSPECTION SOURCE	INSPECTION RESULT DESCRIPTION	INSPECTION COMMENT
2592167	JKLM ENERGY LLC	05/09/2017	Administrative/ File Review						Client	EP Bur Oil Gas Plng Prgm Mgmt			HOWARD, PAUL	EFACTS	Violation(s) Noted	

Violation Details

VIOLATION ID	VIOLATION DATE	VIOLATION CODE & DESCRIPTION	VIOLATION TYPE	VIOLATION COMMENT	RESOLVED DATE	RESOLUTION REASON CODE & DESCRIPTION	CONTINUING VIOLATION	RELATED ENFORCEMENTS
785293	05/09/2017	78a55(i)3iii - EMERGNCY RESPONSE – Registration - Failure of the operator to register the well site name, address & GPS coordinates and entrance GPS coordinates with PEMA, the Department, the Public Safety Answering Point and the county emergency management organization.	Administrative		05/19/2017	CRCTD - Corrected/Abated		353332

Enforcement Details

ENFORCEMENT ID	ENFORCEMENT CODE & DESCRIPTION	EXECUTED ENFORCEMENT DATE	ENFORCEMENT FINAL DATE	ENFORCEMENT FINAL STATUS	PENALTY FINAL DATE	PENALTY FINAL STATUS CODE & DESCRIPTION	PENALTY AMOUNT	TOTAL AMOUNT COLLECTED	RELATED VIOLATIONS
353332	NOV - Notice of Violation	05/11/2017	05/19/2017	Comply/Closed					785293

INSPECTION ID	INSPECTION CLIENT NAME	INSPECTION DATE	INSPECTION TYPE	API / PERMIT	FARM NAME	UNCONVENTIONAL	SITE ID / NAME	FACILITY TYPE	INSPECTION CATEGORY	REGION	COUNTY	MUNICIPALITY	INSPECTOR	INSPECTION SOURCE	INSPECTION RESULT DESCRIPTION	INSPECTION COMMENT
2609712	JKLM ENERGY LLC	06/22/2017	Routine/Partial Inspection	105-21857	SWEDEN VALLEY 101 3HU	Yes	790934 - SWEDEN VALLEY PAD 101 OG ESCGP	Oil & Gas Location	Primary Facility	EP DOGO NCDO Dstr Off	Potter	Summit Twp	TOKARZ, TERRA	SAIR	Viol(s) Noted & Immediately Corrected	On 6/22/17 at 1345 hrs I conducted a routine inspection at the Sweden Valley 101 well site. It was overcast and 82 degrees F. Sean Bacha, Oil and Gas Consultant, was present at the site during the inspection.

The 2HU - 4HU wells were drilled in 2016 and are equipped for production. The 5HU well was spud, however, then plugged in December 2016. A new well permit application for the 6V well (105-21900) was received on 6/5/17.

I observed the E&S controls, production equipment and other materials staged on site. Grass is becoming well established on the topsoil stockpile and around the sediment traps; however, vegetative cover on the well pad fill slopes remains sparse. The sediment traps were observed (Photo #1). ST-1 (southern trap) held a minimal amount of water and had a field measured specific conductance of 209 micro Siemens/cm. The filter fabric had come off the rock filter and should be restaked (Photo #2). ST-2 (northern trap) was approximately half full and had a specific conductance of 73 micro Siemens/cm (Photo #3).

The production equipment is staged in containment, which appeared to be in good condition (Photo #4). Several 55 gallon drums and a tote were staged in containment near the southwest pad corner

													<p>(Photo #5). Two 500 barrel (bbl) tanks were stationed in containment south of the wellheads (Photo #6). A minimal amount of fluid was in the containment; specific conductance was 7.05 mS/cm. An area of standing water was noted on the pad surface adjacent to the containment (on the east side); field measured specific conductance was 4.34mS/cm. A violation of 25 Pa Code Section 78a.54. was cited against the 3 HU well (permit #105-21857).</p> <p>I collected a sample of the fluid for laboratory analysis. Prior to departing the site, I called Mr. Bacha to inform him of my observations and request that the standing water be recovered. At 1623 hrs, I received an update and photo (Photo #7) from Mr. Bacha showing that the fluid had been recovered. Removal of the standing water immediately corrects the violation.</p> <p>No violations are cited against this permit. I concluded the inspection at 1455 hrs. TLT</p>
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Violation Details

VIOLATION ID	VIOLATION DATE	VIOLATION CODE & DESCRIPTION	VIOLATION TYPE	VIOLATION COMMENT	RESOLVED DATE	RESOLUTION REASON CODE & DESCRIPTION	CONTINUING VIOLATION	RELATED ENFORCEMENTS
789439	06/22/2017	78a54 - GENERAL REQUIREMENTS - Operator failed to control and dispose of fluids, residual waste and drill cuttings, including tophole water, brines, drilling fluids, drilling muds, stimulation fluids, well servicing fluids, oil, and production fluids in a manner that prevents pollution of the waters of the Commonwealth and in accordance with 25 Pa. Code §§ 78a.55 – 78a.58 and 78a.60 – 78a.63.	Environmental Health & Safety	Standing water on the pad surface had a field measured specific conductance of 4.34 mS/cm. A sample was collected for laboratory analysis. The standing water was recovered the same day, correcting the violation.	06/22/2017	CRCTD - Corrected/Abated		

No Related Enforcements

INSPECTION ID	INSPECTION CLIENT NAME	INSPECTION DATE	INSPECTION TYPE	API / PERMIT	FARM NAME	UNCONVENTIONAL	SITE ID / NAME	FACILITY TYPE	INSPECTION CATEGORY	REGION	COUNTY	MUNICIPALITY	INSPECTOR	INSPECTION SOURCE	INSPECTION RESULT DESCRIPTION	INSPECTION COMMENT
2665028	JKLM ENERGY LLC	11/21/2017	Routine/Complete Inspection	105-21874	REESE HOLLOW 115 6HU	Yes	814645 - REESE HOLLOW WELL PAD 115 OG ESGP	Oil & Gas Location	Primary Facility	EP DOGO NCDO Dstr Off	Potter	Eulalia Twp	NILES, ELIZABETH	SAIR	Viol(s) Noted & Immediately Corrected	This inspection was created in error; See inspection 2665099 for the corrected report

Violation Details

VIOLATION ID	VIOLATION DATE	VIOLATION CODE & DESCRIPTION	VIOLATION TYPE	VIOLATION COMMENT	RESOLVED DATE	RESOLUTION REASON CODE & DESCRIPTION	CONTINUING VIOLATION	RELATED ENFORCEMENTS
802869	11/21/2017	78a54 - GENERAL REQUIREMENTS - Operator failed to control and dispose of fluids, residual waste and drill cuttings, including tophole water, brines, drilling fluids, drilling muds, stimulation fluids, well servicing fluids, oil, and production fluids in a manner that prevents pollution of the waters of the Commonwealth and in accordance with 25 Pa. Code §§ 78a.55 – 78a.58 and 78a.60 – 78a.63.	Environmental Health & Safety		11/21/2017	ERROR - Entered in Error		

No Related Enforcements

INSPECTION ID	INSPECTION CLIENT NAME	INSPECTION DATE	INSPECTION TYPE	API / PERMIT	FARM NAME	UNCONVENTIONAL	SITE ID / NAME	FACILITY TYPE	INSPECTION CATEGORY	REGION	COUNTY	MUNICIPALITY	INSPECTOR	INSPECTION SOURCE	INSPECTION RESULT DESCRIPTION	INSPECTION COMMENT
2665099	JKLM ENERGY LLC	11/21/2017	Routine/Complete	105-21874	REESE	Yes	814645 - REESE HOLLOW	Oil & Gas Location	Primary	EP DOGO NCDO	Potter	Eulalia Twp	NILES, ELIZABETH	SAIR	Violation(s) Noted	A routine inspection was

		ete Inspection	HOLLOW 115 6HU	WELL PAD 115 OG ESGP	Facility	Dstr Off					<p>conducted at the JKLM Reese Hollow 115 well pad (ESX29-105-16-0003) located in Sweden Twp., Potter Co. on November 21, 2017 @1235 hours. Keane Group, Inc. was onsite conducting stimulation activities on the 6HU well (API#10521874). Scott West, a Consultant for JKLM, was present onsite for the inspection. Mr. West contacted Mr. Jon Manuel, he arrived onsite after fluid exhibiting high conductivity was discovered off containment.</p> <p>Fluid was observed along the western side of the pad containment. The fluid level was up to the top of the rig matting. An Oakton Multi-Parameter PCSTestr 35 was used to test the field conductivity of the fluid in containment at "Or" or >20.00 mS/cm (see Photo#1). Photos #2 and #3 show the level of fluid in the primary containment. A puddle just off containment (see photo #4), on the west side of the pad, had a field tested conductivity of "Or" or >20.00 mS/cm (see photo #5).</p> <p>The pollutional material was observed spilling out of the corner of the pad containment (see photo #7) and accumulating onto the</p>

ground (see photo #6). This fluid had a field measured conductivity of "Or" or >20.00 mS/cm (see photo#8). Mr. West attempted to mitigate the flow of fluid from the corner of the containment (see photo #9). The fluid was flowing into a concrete drop box that discharged into a rock lined ditch (RLD) (see photo #10). At 1345 hours, Mr. Jon Manuel arrived onsite equipped with a soil conductivity probe. He used his soil probe to test the underlying soil in the RLD. Mr. Manuel's soil probe detected soil conductivity readings of 1.73 mS/cm in the superficial soil (see photo #11), and 5.66 mS/cm when placed deeper in visibly damp soil (see photo #12).

Two additional field conductivity readings were taken in an attempt to ascertain the extent of the spill. A field conductivity reading of the water in ST-1 was taken at the base of the RLD and found to be 2.20 mS/cm. A field conductivity reading of the water discharging into the level spreader from the skimmer in ST-1 was found to be 1527 S/cm.

The southern edge of the

primary pad containment was also screened for field conductivity. A puddle was observed on the pad surface (off containment) below folded containment that did not appear functional (see photo #16). The field conductivity of the puddle was measured at 3.75 mS/cm (see photo #15). Walking due east along the southern edge of containment standing fluid, observed in containment (see photo #18), had a field measured conductivity of "Or" or >20.00 mS/cm. Accumulated fluid in the SE corner of the pad containment, adjacent to the red 500 bbl tanks, had a field measured conductivity of "Or" or >20.00mS/cm (see photo #19). A puddle on the pad surface off containment, adjacent to the red 500 bbl tanks, had a field measured conductivity of 1059 S/cm. Puddles around the AST, on the pad surface, were screened and found not exhibit elevated conductivity.

Sample 4427-145 was collected @1408 hours from the NW corner of the pad containment where the fluid was observed spilling onto the pad surface (see photo #21). A vac truck began removing the accumulated fluid after the

VIOLATION ID	VIOLATION DATE	VIOLATION CODE & DESCRIPTION	VIOLATION TYPE	VIOLATION COMMENT	RESOLVED DATE	RESOLUTION REASON CODE & DESCRIPTION	CONTINUING VIOLATION	RELATED ENFORCEMENTS
802856	11/21/2017	91.33(A) - INCIDENTS CAUSING OR THREATENING POLLUTION - Failure to notify the Department of an accident or other activity or incident, a toxic substance or another substance which would endanger downstream users of the waters, result in pollution or create a danger of pollution of the waters of this Commonwealth, or would damage property.	Environmental Health & Safety	Failure to immediately notify the Department of a polluttional incident. Release discovered as the result of a routine inspection conducted by the DEP.				359827
802857	11/21/2017	CSL 402(b) - POTENTIAL POLLUTION - Conducting an activity regulated by a permit issued pursuant to Section 402 of The Clean Streams Law to prevent the potential of pollution to waters of the Commonwealth without a permit or contrary to a permit issued under that authority by the Department.	Environmental Health & Safety	Fluid exhibiting an elevated conductivity was released to the pad service in multiple areas with the potential to pollute Waters of the Commonwealth.				359827
802858	11/21/2017	SWMA 301 - Failure to properly store, transport, process or dispose of a residual waste.	Environmental Health & Safety	Failure to properly store, transport, process or dispose of a residual waste.				359827
802859	11/21/2017	OGA3218.2(A) - Failure to design and construct unconventional well site to prevent spills to the ground surface and off well site.	Environmental Health & Safety	Failure to design and construct unconventional well site to prevent spills to the ground surface and off well site.				359827
802860	11/21/2017	78a64a__(d) - SECONDARY CONTAINMENT – Double walled tanks used to fulfill secondary containment requirements in 25 Pa. Code § 78a.64a failed to be capable of detecting a leak in primary containment.	Environmental Health & Safety	Failure to provide adequate storage for precipitation in the primary containment, resulting in overtopping of the containment and a release to the pad surface.	12/18/2017	ERROR - Entered in Error		359827
802861	11/21/2017	78a54 - GENERAL REQUIREMENTS - Operator failed to control and dispose of fluids, residual waste and drill cuttings, including tophole water, brines, drilling fluids, drilling muds, stimulation fluids, well servicing fluids, oil, and production fluids in a manner that prevents pollution of the waters of the Commonwealth and in accordance with 25 Pa. Code §§ 78a.55 – 78a.58 and 78a.60 – 78a.63.	Environmental Health & Safety	Operator failed to control and dispose of stimulation fluids.				359827

Enforcement Details

ENFORCEMENT ID	ENFORCEMENT CODE & DESCRIPTION	EXECUTED ENFORCEMENT DATE	ENFORCEMENT FINAL DATE	ENFORCEMENT FINAL STATUS	PENALTY FINAL DATE	PENALTY FINAL STATUS CODE & DESCRIPTION	PENALTY AMOUNT	TOTAL AMOUNT COLLECTED	RELATED VIOLATIONS
359827	NOV - Notice of Violation	11/29/2017							802858 802860 802857 802859 802856 802861

INSPECTION ID	INSPECTION CLIENT NAME	INSPECTION DATE	INSPECTION TYPE	API / PERMIT	FARM NAME	UNCONVENTIONAL	SITE ID / NAME	FACILITY TYPE	INSPECTION CATEGORY	REGION	COUNTY	MUNICIPALITY	INSPECTOR	INSPECTION SOURCE	INSPECTION RESULT DESCRIPTION	INSPECTION COMMENT
2668838	JKLM ENERGY LLC	12/07/2017	Routine/Complete Inspection	105-21874	REESE HOLLOW 115 6HU	Yes	814645 - REESE HOLLOW WELL PAD 115 OG ESGP	Oil & Gas Location	Primary Facility	EP DOGO NCDO Dstr Off	Potter	Eulalia Twp	VANFLEET, SEAN	SAIR	Outstanding Violations - Viols Req'd	I arrived on site with Clark Smith of the Environmental Cleanups program and was met by Tyler McConnell of JKLM. We were there to follow up on the containment violations and release noted in an 11/21 inspection by Elizabeth Niles, WQS for the Oil & Gas program. We proceeded to the northwest corner of the pad to the level spreader and sediment trap where Ellie noted the high conductance fluid both in and outside the containment. We noted that the sediment trap had obviously been excavated to an unspecified depth; the water in the trap showed conductance of .63 mS/cm and had frozen enough to walk on. A small amount of slushy water (1-2 gallons) in the containment corner had conductance that read as "OR" on my meter (over 20

mS/cm). Tyler pointed out a vac truck in this area, and told us they had one on the opposite corner as well, as both spots were low spots where water collects. Tyler informed me that JKLM had had 2 of their employees on location during all operations since the incident, as well as utilizing North Country employees with conductivity meters to monitor the pad continuously since the 11/21 inspection. The containment corner had been pinned back up to avoid the breach that led to the release as well. We then moved around the site, checking conductance where puddles were not frozen solid (as the majority were), towards the AST. At the tank, we met a North Country employee who was tasked with making rounds on the site hourly, taking soil conductance readings (picture #1). At that point, John Manuel of JKLM joined us. I was able to break up some ice in a small puddle (approximately 1 gallon) at the AST to get a conductance reading 2.5 mS/cm). John said he would have it vacced if possible due to it being almost entirely ice. I followed up on a phone call regarding another matter with Joe Herrick of JKLM on

																	<p>12/8 regarding the containment issues at the corners. Joe said that they would be addressing the lack of support for the liner at the corners with the containment company to ensure that the same issue did not arise again. Violations were originally cited against permit #105-21874 and remain outstanding at this time. Please note that the violation originally cited under Well Site Secondary Containment (78a64a__d, Double walled tanks...) was incorrect and has been replaced in this inspection report with the correct violation (78a64a(d), secondary containment failed to have storage capacity sufficient to hold the volume of the largest single aboveground primary containment, plus an additional 10% of volume for precipitation).</p>
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Violation Details

VIOLATION ID	VIOLATION DATE	VIOLATION CODE & DESCRIPTION	VIOLATION TYPE	VIOLATION COMMENT	RESOLVED DATE	RESOLUTION REASON CODE & DESCRIPTION	CONTINUING VIOLATION	RELATED ENFORCEMENTS
803646	12/08/2017	91.33(A) - INCIDENTS CAUSING OR THREATENING POLLUTION - Failure to notify the Department of an accident or other activity or incident, a toxic substance or another substance which would endanger downstream users of the waters, result in pollution or create a danger of pollution of the waters of this Commonwealth, or would damage property.	Environmental Health & Safety	Outstanding violation				
803647	12/08/2017	OGA3218.2(A) - Failure to design and construct unconventional well site to prevent spills to the ground surface and off well site.	Environmental Health & Safety	Outstanding violation				
803648	12/08/2017	78a54 - GENERAL REQUIREMENTS - Operator failed to control and dispose of fluids, residual waste and drill cuttings, including tophole water, brines, drilling fluids, drilling muds, stimulation fluids, well servicing fluids, oil, and production fluids in a manner that prevents pollution of the waters of the Commonwealth and in accordance with 25 Pa. Code §§ 78a.55 – 78a.58 and 78a.60 – 78a.63.	Environmental Health & Safety	Outstanding violation				
803649	12/08/2017	SWMA 301 - Failure to properly store, transport, process or dispose of a residual waste.	Environmental Health & Safety	Outstanding violation				
803650	12/08/2017	78a64a(d) - SECONDARY CONTAINMENT - Secondary containment failed to have storage capacity sufficient to hold the volume of the largest single aboveground primary containment, plus an additional 10% of volume for precipitation.	Environmental Health & Safety	Outstanding violation				
803651	12/08/2017	CSL 402(b) - POTENTIAL POLLUTION - Conducting an activity regulated by a permit issued pursuant to Section 402 of The Clean Streams Law to prevent the potential of pollution to waters of the Commonwealth without a permit or contrary to a permit issued under that authority by the Department.	Environmental Health & Safety	Outstanding violation				

No Related Enforcements

INSPECTION ID	INSPECTION CLIENT NAME	INSPECTION DATE	INSPECTION TYPE	API / PERMIT	FARM NAME	UNCONVENTIONAL	SITE ID / NAME	FACILITY TYPE	INSPECTION CATEGORY	REGION	COUNTY	MUNICIPALITY	INSPECTOR	INSPECTION SOURCE	INSPECTION RESULT DESCRIPTION	INSPECTION COMMENT
2671978	JKLM ENERGY LLC	12/18/2017	Administrative/ File Review	105-21874	REESE HOLLOW 115 6HU	Yes	814645 - REESE HOLLOW WELL PAD 115 OG ESGP	Oil & Gas Location	Primary Facility	EP DOGO NCDO Dstr Off	Potter	Eulalia Twp	NUSS, MATTHEW	SAIR	Violation(s) Noted	Upon receipt and review of the operator response for the Notice of Violation cited for the release of regulated substance to the ground surface discovered during an inspection on November 21, 2017 the violation for 25 PA Code Section 78a.64a (d) has been revised. The violation 25 PA Code Section 78a.64a(d) has been closed and a violation has been cited against 25 PA Code Section 78a.64a (e); for failure to remove stormwater as soon as possible and prior to the capacity of second payment being reduced by 10 % or more.

Violation Details

VIOLATION ID	VIOLATION DATE	VIOLATION CODE & DESCRIPTION	VIOLATION TYPE	VIOLATION COMMENT	RESOLVED DATE	RESOLUTION REASON CODE & DESCRIPTION	CONTINUING VIOLATION	RELATED ENFORCEMENTS
804255	12/18/2017	78a64a____(e) - SECONDARY CONTAINMENT – Operator failed to remove stormwater as soon as possible and prior to the capacity of secondary containment being reduced by 10% or more.	Environmental Health & Safety	Revised the violation previously cited				

No Related Enforcements

INSPECTION ID	INSPECTION CLIENT NAME	INSPECTION DATE	INSPECTION TYPE	API / PERMIT	FARM NAME	UNCONVENTIONAL	SITE ID / NAME	FACILITY TYPE	INSPECTION CATEGORY	REGION	COUNTY	MUNICIPALITY	INSPECTOR	INSPECTION SOURCE	INSPECTION RESULT DESCRIPTION	INSPECTION COMMENT
2693905	JKLM ENERGY LLC	02/12/2018	Routine/Compl ete Inspection	105-21874	REESE HOLLOW 115 6HU	Yes	814645 - REESE HOLLOW WELL PAD 115 OG ESGP	Oil & Gas Location	Primary Facility	EP DOGO NCDO Dstr Off	Potter	Eulalia Twp	NILES, ELIZABETH	SAIR	Outstanding Violations - Viols Req'd	The Department of Environmental Protection inspected the JKLM Reese Hollow 115 well pad located in Sweden Twp., Potter Co.

on 2/12/2018 @ 1130 hours. Scott West, JKLM was present for the inspection. JKLM is in the process of pulling up the pad-wide containment. Approximately ¼ of the containment was remaining during the inspection. A large pile of snow was observed stockpiled on the remaining containment. Mr. West stated they are using two gas busters onsite to melt the snow. The recovered liquids are being stored in the Aboveground Storage Tank (AST) onsite, awaiting transfer to the frack at the Headwaters 145 site. Any recovered solids are being placed in residual waste containers awaiting transfer to a disposal facility. Due to recent weather the pad surface is a mix of large puddles, ice and snow. The field conductivity of the large puddles at the center of the pad were ~2.0 mS/cm. A vac truck was in the process of removing the puddles. The standing fluid in the remaining containment had a field conductivity of ~2.5 mS/cm. The rig matting had already been removed and was stockpiled on separate containment in the SW corner of the pad. A new double layer containment area was being constructed on which to clean the rig

VIOLATION ID	VIOLATION DATE	VIOLATION CODE & DESCRIPTION	VIOLATION TYPE	VIOLATION COMMENT	RESOLVED DATE	RESOLUTION REASON CODE & DESCRIPTION	CONTINUING VIOLATION	RELATED ENFORCEMENTS
808192	02/12/2018	CSL 402(b) - POTENTIAL POLLUTION - Conducting an activity regulated by a permit issued pursuant to Section 402 of The Clean Streams Law to prevent the potential of pollution to waters of the Commonwealth without a permit or contrary to a permit issued under that authority by the Department.	Environmental Health & Safety	Fluid exhibiting an elevated conductivity was released to the pad service in multiple areas with the potential to pollute Waters of the Commonwealth.			Yes	
808193	02/12/2018	91.33(A) - INCIDENTS CAUSING OR THREATENING POLLUTION - Failure to notify the Department of an accident or other activity or incident, a toxic substance or another substance which would endanger downstream users of the waters, result in pollution or create a danger of pollution of the waters of this Commonwealth, or would damage property.	Environmental Health & Safety	Failure to immediately notify the Department of a pollutional incident. Release discovered as the result of a routine inspection conducted by the DEP.			Yes	
808194	02/12/2018	OGA3218.2(A) - Failure to design and construct unconventional well site to prevent spills to the ground surface and off well site.	Environmental Health & Safety	Failure to design and construct unconventional well site to prevent spills to the ground surface and off well site.			Yes	
808195	02/12/2018	78a54 - GENERAL REQUIREMENTS - Operator failed to control and dispose of fluids, residual waste and drill cuttings, including tophole water, brines, drilling fluids, drilling muds, stimulation fluids, well servicing fluids, oil, and production fluids in a manner that prevents pollution of the waters of the Commonwealth and in accordance with 25 Pa. Code §§ 78a.55 – 78a.58 and 78a.60 – 78a.63.	Environmental Health & Safety	Operator failed to control and dispose of stimulation fluids.			Yes	
808196	02/12/2018	SWMA 301 - Failure to properly store, transport, process or dispose of a residual waste.	Environmental Health & Safety	Failure to properly store, transport, process or dispose of a residual waste.			Yes	
808197	02/12/2018	78a64a____(e) - SECONDARY CONTAINMENT – Operator failed to remove stormwater as soon as possible and prior to the capacity of secondary containment being reduced by 10% or more.	Environmental Health & Safety	Revised the violation previously cited			Yes	

No Related Enforcements

INSPECTION ID	INSPECTION CLIENT NAME	INSPECTION DATE	INSPECTION TYPE	API / PERMIT	FARM NAME	UNCONVENTIONAL	SITE ID / NAME	FACILITY TYPE	INSPECTION CATEGORY	REGION	COUNTY	MUNICIPALITY	INSPECTOR	INSPECTION SOURCE	INSPECTION RESULT DESCRIPTION	INSPECTION COMMENT
2697604	JKLM ENERGY LLC	02/23/2018	Administrative/ File Review				820712 - HEADWATERS WELL PAD 142 OG ESGP		Site	EP DOGO NCDO Dstr Off			NILES, ELIZABETH	SAIR	Violation(s) Noted	<p>An administrative inspection was conducted 2/23/2018 due to receipt of results from sample 4427-147 collected 2/6/2018 in response to spill notification #332209. The spill was reported to the Department by Joe Harrick, JKLM on 2/5/2018 at 1600 hours with the following details. Approximately 400-500 gallons of fluid with a conductivity of 2.5 mS/cm was released to the pad surface from a freshwater storage tank leaking approximately 1-2 gpm.</p> <p>Sample results are consistent with information received from the company, regarding offloading of production fluid into the freshwater Aboveground Storage Tank.</p> <p>Please reference Inspection Record#2692292 for additional information. Violations are issued at this time. Please contact me with any questions.</p>

Violation Details

VIOLATION ID	VIOLATION DATE	VIOLATION CODE & DESCRIPTION	VIOLATION TYPE	VIOLATION COMMENT	RESOLVED DATE	RESOLUTION REASON CODE & DESCRIPTION	CONTINUING VIOLATION	RELATED ENFORCEMENTS
809143	02/23/2018	CSL 402(b) - POTENTIAL POLLUTION - Conducting an activity regulated by a permit issued pursuant to Section 402 of The Clean Streams Law to prevent the potential of pollution to waters of the Commonwealth without a permit or contrary to a permit issued under that authority by the Department.	Environmental Health & Safety					361858
809144	02/23/2018	78.57(a) - CONTROL, STORAGE AND DISPOSAL OF PRODUCTION FLUIDS - Operator failed to collect the brine and other fluids produced during operation, service and plugging of the well in a tank, pit or a series of pits or tanks, or other device approved by the Department or Operator discharged brine or other fluids on or into the ground or into waters of the Commonwealth.	Environmental Health & Safety					361858
809145	02/23/2018	SWMA 301 - Failure to properly store, transport, process or dispose of a residual waste.	Environmental Health & Safety					361858

Enforcement Details

ENFORCEMENT ID	ENFORCEMENT CODE & DESCRIPTION	EXECUTED ENFORCEMENT DATE	ENFORCEMENT FINAL DATE	ENFORCEMENT FINAL STATUS	PENALTY FINAL DATE	PENALTY FINAL STATUS CODE & DESCRIPTION	PENALTY AMOUNT	TOTAL AMOUNT COLLECTED	RELATED VIOLATIONS
361858	NOV - Notice of Violation	02/23/2018							809145 809143 809144

INSPECTION ID	INSPECTION CLIENT NAME	INSPECTION DATE	INSPECTION TYPE	API / PERMIT	FARM NAME	UNCONVENTIONAL	SITE ID / NAME	FACILITY TYPE	INSPECTION CATEGORY	REGION	COUNTY	MUNICIPALITY	INSPECTOR	INSPECTION SOURCE	INSPECTION RESULT DESCRIPTION	INSPECTION COMMENT
2703375	JKLM ENERGY LLC	03/08/2018	Routine/Complete Inspection				820712 - HEADWATERS WELL PAD 142 OG ESGP		Site	EP DOGO NCDO Dstr Off			NILES, ELIZABETH	SAIR	Outstanding Violations - Viols Req'd	The Department of Environmental Protection inspected the JKLM headwaters 142 well pad located in Ulysses Township, Potter County on March 8, 2018 at 1215 hrs. the weather was 27° and cloudy with snow squalls in the area. Approximately 2

to 4 inches of snow on the ground. The surface condition of the well pad was very muddy. Steve Mills, JKLM representative was on location.

And above ground storage tank (AST) containing what is labeled as freshwater is located centrally on the pad. Mr. Mills stated even though this tank is for freshwater use, it is constructed with a double liner. Constant truck traffic was observed onsite offloading freshwater into the AST. A temporary waterline carries the water to the AST on the 143 well pad, and from there it is pumped to the ongoing frack at the 145 well pad.

The aboveground storage tank that was reported leaking on February 5, 2018 has been dismantled and removed from the site. There are four waste containers observed on site. It is not clear if this material is drill cuttings from the HAD rig, or excavated pad material from the spill. Violations from the 2/5/2018 spill remain outstanding, pending approval of the final report. No new violations are noted at this time. I departed the site at 1300 hrs.

Violation Details

VIOLATION ID	VIOLATION DATE	VIOLATION CODE & DESCRIPTION	VIOLATION TYPE	VIOLATION COMMENT	RESOLVED DATE	RESOLUTION REASON CODE & DESCRIPTION	CONTINUING VIOLATION	RELATED ENFORCEMENTS
810338	03/08/2018	CSL 402(b) - POTENTIAL POLLUTION - Conducting an activity regulated by a permit issued pursuant to Section 402 of The Clean Streams Law to prevent the potential of pollution to waters of the Commonwealth without a permit or contrary to a permit issued under that authority by the Department.	Environmental Health & Safety				Yes	
810339	03/08/2018	78.57(a) - CONTROL, STORAGE AND DISPOSAL OF PRODUCTION FLUIDS - Operator failed to collect the brine and other fluids produced during operation, service and plugging of the well in a tank, pit or a series of pits or tanks, or other device approved by the Department or Operator discharged brine or other fluids on or into the ground or into waters of the Commonwealth.	Environmental Health & Safety				Yes	
810340	03/08/2018	SWMA 301 - Failure to properly store, transport, process or dispose of a residual waste.	Environmental Health & Safety				Yes	

No Related Enforcements

Grand Total - Inspections: 20; Inspections With Violations: 20; Violations: 56; Enforcements: 14; Wells Inspected: 5