

DEP Office	California Oil & Gas Office	Inspection Type	Site
Address	25 Technology Drive, California Technology Park	Permit or Reg. #	----
Addr Cont	Coal Center, PA 15423	ESCGP #	ESX12-059-0016
Oper. Name	CNX GAS CO LLC	Site #	759382
Oper. Address	1000 CONSOL ENERGY DR CANONSBURG, PA 15317-6506	Project #	----
Resp. Official Name		Farm Name & Well #	MORRIS TO MAJORSVILLE PIPELINE PROJECT ESCGP-EXPEDITED
Resp. Official Phone		Other Info	----
Latitude	----	Longitude	----
County	Greene	Municipality	Gray Township
Inspection Code	INCDT - Incident- Response to Accident or Event	Facility	----
Permits/Auths	ESCGP	Site Phase	Restored/Prod
Well Info	----	Well Kind & Description	----

GENERAL COMMENTS

An incident inspection was conducted at the Morris to Majorsville Pipeline Project on 9/23/21. The spill was reported to the Department by the operator at 10:26 pm on 9/17/21 following the incident at 8:30 pm. I was accompanied on site by Adam White (CNX).

The release of brine was discovered during regular waterline checks. A faulty air relief valve was determined to be the cause and was removed/replaced with a plug (photo 1). Penn E&R was on site to delineate the release on 9/17/21 with consultants monitoring the area until equipment could be brought in. 18 Karat is the excavation company for remediation with SPSI handling excavated material disposal. Excavation began Monday morning and is ongoing at the time of this inspection.

Excavation has taken place at the vault, around an existing gas line and downslope. A vacuum truck was used to haul off material from inside the vault.

Volume was determined to be 5-7 barrels based on the amount of excavated material. At the time of this inspection, areas to have additional excavation were marked in orange paint (photo 3). Penn E&R determined these areas needed additional excavating due to elevated conductivity (photo 6).

The operator will be following Act 2 guidelines for remediation.

Violations of 78a54, 78a57(a) and SWMA 301 are being issued for the release.

REMARKS / VIOLATIONS

Category	Sub-Category	Inspection Remarks / Violations / Violation Remarks	I	R	V
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Waste Control & Disposal	1: Production Fluids Control & Storage : Production Fluids Control & Storage	Inspection Remark:	<input checked="" type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>
	NEW	Violation: 78a57(a) - CONTROL, STORAGE AND DISPOSAL OF PRODUCTION FLUIDS - Operator failed to collect brine and other fluids produced during operation of the well in a tank, series of tanks, or other device approved by the Department for subsequent disposal or reuse. Violation Date: 2021-09-23 Violation Remarks:	
	1: Waste Management General: Waste Management General	Inspection Remark:	<input checked="" type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>
	NEW	Violation: 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. Violation Date: 2021-09-23 Violation Remarks:	
NEW	Violation: SWMA 301 - MANAGEMENT OF RESIDUAL WASTE - Person operated a residual waste processing or disposal facility without obtaining a permit for such facility from DEP. Person stored, transported, processed, or disposed of residual waste inconsistent with or unauthorized by the rules and regulations of DEP. Violation Date: 2021-09-23 Violation Remarks:		

Inspection Results	Files Attached	Photos Attached	Date Inspected
VIOLS - Violation(s) Noted	<input type="checkbox"/>	<input checked="" type="checkbox"/>	09/23/2021

SIGNATURE


MICHAEL ANTHONY MCCOY, ENVTL TRN

Arrival: 09/23/2021 07:40:00 AM, Departure: 09/23/2021 07:46:00 AM

NOTICE OF VIOLATION(S)

Citation	Description of Violation
25 Pa. Code § 78a.57(a)	78a57(a) - CONTROL, STORAGE AND DISPOSAL OF PRODUCTION FLUIDS - Operator failed to collect brine and other fluids produced during operation of the well in a tank, series of tanks, or other device approved by the Department for subsequent disposal or reuse.
25 Pa. Code § 78a.54	78a54 - GENERAL REQUIREMENTS - Operator failed to control and dispose of fluids, residual waste and drill cuttings, including top hole 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.
35 P.S. § 6018.301	SWMA 301 - MANAGEMENT OF RESIDUAL WASTE - Person operated a residual waste processing or disposal facility without obtaining a permit for such facility from DEP. Person stored, transported, processed, or disposed of residual waste inconsistent with or unauthorized by the rules and regulations of DEP.

Note: This Notice of Violation is neither an order nor any other final action of the Department of Environmental Protection. It neither imposes nor waives any enforcement action available to the Department under any of its statutes. If the Department determines that an enforcement action is appropriate, you will be notified of the action.

58 Pa.C.S. § = Act 13(OGA) • 25 Pa.Code § • 35 P.S. § 6018. = Solid Waste Management Act • 35 P.S. § 691. = Clean Streams Law

MAILED BY**CERT MAIL#****MAIL DATE**

INSTRUCTIONS RESPONSE

- You are requested to respond as indicated below by 10/08/2021. If applicable, please include the description of activities you will pursue to achieve compliance with the statutes or regulations cited above. Address your reply to the DEP representative named below.
- No further response required at this time.
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- Written response requested
- Add what you will do to correct the situation and achieve compliance?
- Include the schedule or anticipated time frame for compliance activities you intend to carry out

RESPONSE COMMENTS

CNX will need to follow the Act 2 guidelines as set by 78a.66(c)(2).

Please provide an electronic copy of the NOV response to EGM Dave McDermott (davmcdermo@pa.gov) and WQS Michael McCoy (michamccoy@pa.gov).

INSPECTION IMAGES



#: 1

Air relief valve removed



#: 2

Excavation



#: 3

Orange circles need additional excavating



#: 4

Site overview



#: 5

Excavation



#: 6

Elevated conductivity



#: 7

Site overview