

DEP Office	Eastern Oil & Gas District Office	Inspection Type	PF
Address	208 West Third Street, Suite 101	Permit or Reg. #	081-21946
Addr Cont	Williamsport, PA 17701-6448	ESCGP #	----
Oper. Name	EQT ARO LLC	Site #	846726
Oper. Address	400 WOODCLIFF DR CANONSBURG, PA 15317-5851	Project #	MALLORY PAD A
Resp. Official Name	Rick Hall	Farm Name & Well #	Mallory Pad A
Resp. Official Phone		Other Info	----
Latitude	41.45893	Longitude	-76.82136
County	Lycoming	Municipality	Plunketts Creek Township
Inspection Code	FUI - Follow-up Inspection	Facility	Multi-Well Pad
Permits/Auths	Well Permit	Site Phase	Drill/Alt
Well Info	Unconventional	Well Kind & Description	Horizontal Well

**Stream Class**

\* EV, MF - Exceptional Value Waters, Migratory Fish

**Watershed**

10B - Loyalsock Creek

**Producing Formation**

MARCF - MARCELLUS

**GENERAL COMMENTS**

This follow-up inspection was conducted following a reported release of produced fluid to the pad surface from 3/1/24. A workover rig is in operation drilling out plugs on the well pad following fracing operations. Equipment for the frac has mostly been removed from the location. Additional equipment was being hauled away during this inspection. I met with EQT company man Marc McCartor at the beginning of this inspection. The area of the pad surface which was impacted by the 3/1/24 release appeared dry without any visible staining.

Fluid is present in the stormwater channel along the northwest pad edge. The fluid is present in the channel from the approximate halfway point of the pad edge to the compost filter sock infiltration berm at the west corner of the pad. The electrical conductivity (EC) of the fluid is 4.46 mS/cm near the halfway point of the pad edge. Approximately 25 feet west within the channel, the EC peaked at 10.23 mS/cm and then gradually decreased as it headed farther west within the channel. The EC of the fluid where the path of the fluid ended at the compost filter sock berm at the west corner is 2.43 mS/cm.

I notified the company man about the elevated EC fluid in the stormwater channel and then took sample 0718-237 from the fluid in the stormwater channel at 1242. The sample was sent to the state laboratory on the same day to be analyzed for SAC 942 plus Br, Li, and Al.

I left a voicemail for EQT representative Rick Hall at 1338 on the same day to let him know of my findings. Later that day at 1555 I spoke with EQT representative Zac Subra. He told me that an internal investigation found that a contractor was flushing lines which had contained produced fluid following fracing operations. The contractor released what they believed to be freshwater which actually contained some portion of produced fluid. Mr. Subra said that they believe that this was the origin of the fluid in the channel and that EQT intends to pursue Act 2 remediation for this release. He also stated that a vacuum truck was already on site removing the fluid with elevated electrical conductivity. He said Penn E&R and Tobias Excavation was en route to the site to characterize and excavate the impacted material, respectively.

The Department recommends pursuing Act 2 remediation due to the unknown volume of the release.

Violations noted against permit 081-21946.

Violations remain outstanding against permit 081-21938 for the 3/1/24 produced fluid release.

**REMARKS / VIOLATIONS**

Category	Sub-Category	Inspection Remarks / Violations / Violation Remarks	I	R	V
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Spills & Releases	1: Clean Streams Law: Clean Streams Law	<b>Inspection Remark:</b>  <b>NEW</b> <b>Violation:</b> 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. <b>Violation Date:</b> 2024-05-08 <b>Violation Remarks:</b> The Department discovered fluid with elevated electrical conductivity in the stormwater channel along the northwest side of the well pad.	<input checked="" type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>
Erosion & Sediment Control	1: E & S Control Requirements: E & S Control Requirements	<b>Inspection Remark:</b> Temporary E&S BMPs have been removed. No E&S issues noted.	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>
Oil & Gas General	1: Emergency Response Planning: Emergency Response Planning	<b>Inspection Remark:</b> The site sign is present at the entrance to the access road.	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>
Encroachments	1: E & S Control Requirements: E & S Control Requirements	<b>Inspection Remark:</b> The two stream crossings along the access road appear to be in good condition. No E&S issues noted.	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>



v2024.2.1

**SURFACE INSPECTION REPORT**

<b>DEP USE ONLY</b>
Complaint Record No.

Inspection Record No. 3759289
Enforcement Record No.

Restorations	1: PCSM Requirements: PCSM Requirements	<b>Inspection Remark:</b> A series of earthen and compost filter sock infiltration berms is installed around the pad and access road. The berms appear to be functioning as designed. The compost filter sock infiltration berm at the west corner of the well pad is not well vegetated and the compost appears to be slightly eroded. The Department recommends repairing the berm.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	1: Permit Termination: Permit Termination	<b>Inspection Remark:</b> The ESCGP expires in 2026.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Waste Control & Disposal	1: Temporary Storage: Temporary Storage	<b>Inspection Remark:</b> The MASS is still present on the well pad. The pumps that were present next to the mass on secondary containment have been removed from the location. The MASS is labeled impaired water. The MASS appears to be in good condition.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	1: Well Site Secondary Containment: Well Site Secondary Containment	<b>Inspection Remark:</b> The well site secondary containment appears to be in good condition. No holes or crushed berms were observed.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Inspection Results	Files Attached	Photos Attached	Date Inspected
VOV - Violation(s) & Outstanding Violations	<input type="checkbox"/>	<input checked="" type="checkbox"/>	05/08/2024

**SIGNATURE**


SARA METZ, WTR QLTY SPCST

Arrival: 05/08/2024 12:00:00 PM, Departure: 05/08/2024 01:05:00 PM

SAMPLE NO.	LOCATION / DESCRIPTION	DATE OF SAMPLE	TIME
0718-237 DEP Lab	Lat: 41.459194 Long: -76.822029 Location: Mallory Pad A Description: Northwest Stormwater Channel	05/08/2024	12:42 PM

**NOTICE OF VIOLATION(S)**

Citation	Description of Violation
35 P.S. § 691.402(b)	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.

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 05/24/2024. 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.



Written response requested



Has to be done (Specify in the comment section below)



Add what you will do to correct the situation and achieve compliance?



Include explanation of cause of violations



Include the schedule or anticipated time frame for compliance activities you intend to carry out

**INSPECTION IMAGES****#: 1**

The stormwater channel along the northwest side of the well pad looking to the west from the approximate halfway point of the pad edge. The fluid in the channel had an electrical conductivity of between 2.43 mS/cm to 10.23 mS/cm.

**#: 2**

The workover rig in operation on the well pad.



**#: 3**

Sample 0718-237 taken from the northwest stormwater channel during this inspection.



**#: 4**

The MASS present on the well pad.