

FREQUENTLY ASKED QUESTIONS
Environmental Protection Performance
eSubmission and eNotification Questions

eSUBMISSION

- 1. For Area of Review (AOR) in eSubmission, when using the latitude and longitude to select the method can degrees, minutes, seconds be used?**

Decimal degrees should be used for all submission requesting latitude and longitude information. (posted 01/11/17)

- 2. Will an operator receive an email once the AOR submission is approved?**

AOR submissions will not be approved by DEP. Operators will see a status of "Submitted." If the AOR is reviewed and issues are discovered, the Department of Environmental Protection (DEP) will notify the operator under the provisions in section 78a.52a(e). 25 Pa. Code Chapter 78a.52. DEP will provide a description of why the submission was returned. (posted 01/11/17)

- 3. Will operators be sent notifications via email if something is not accepted?**

The user who submits documents within the eSubmission application will receive an email notification once it is accepted or returned by DEP. The return email will include a description of why the submission was returned. (posted 01/11/17)

- 4. On the dashboard under "Status," what are the different types (Submitted, Returned, Accepted...)?**

Submitted - DEP has received the submission.

Returned - Your submission is being returned due to one or more administrative deficiencies. Please correct these deficiencies and re-submit the required information. The return reason is listed with the Submission details below.

Accepted - Your submission has been administratively accepted by the DEP. Please be advised that "acceptance" does not constitute "approval". For those submission types that require formal approval or denial on behalf of DEP, you will receive separate correspondence via mail advising you of the formal disposition of the request. (posted 01/11/17)

- 5. Is there an AOR form for operators to fill out? Or can it be a Microsoft Word document?**

The form can be downloaded from *Guidelines for Implementing Area of Review (AOR) Regulatory Requirement for Unconventional Wells*, (AOR TGD) Technical Guidance No. 800-0810-001 or in the eSubmission application. (posted 01/11/17)

6. Are the new forms ready for download yet?

The new forms are available in DEP's [eLibrary](#). (posted 01/11/17)

7. Will operators still be sent paper copies of the submitted and approved documents similar to what is currently received?

Operators will continue to receive approval letters from DEP. Operators will have access to all of the submissions within the eSubmission application in the Dashboard.

8. If an operator exceeds the threshold for submission of pre-drill survey results, can multiple files be uploaded?

Yes, multiple files can be submitted for each pre-drill survey submission. (posted 01/11/17)

9. On eSubmissions pre-drill water survey results - where is a bulk uploader? It appears that each individual water purveyor has to be entered separately.

Please see the eSubmission application guide for instruction on how to submit pre-drill water survey results [here](#). (posted 01/11/17)

10. Are the guidance documents and templates available on the website or only in the eSubmission/eNotification application?

Guidance documents and forms can be found within the application and on [eLibrary](#).

Excel templates can be downloaded from the eSubmission application. (posted 01/11/17)

11. When will eSubmission go live? Will the Electronic Filing Administrator (EFA) be instantly approved for access? The current note for the EFA is "Access has been denied. You must be authenticated via DEPGreenPort before using this system."

eSubmission was deployed October 3, 2016. The existing EFAs were automatically enrolled in this application. (posted 01/11/17)

12. Do we fill out the *Well Record* and *Completion Report* online or do we have to upload it?

The *Well Record*, form 8000-FM-OOGM0004a and the *Completion Report*, form 8000-FM-OOGM0004b are uploaded in the eSubmission application.

13. How would an operator amend a *Completion Report* that has been previously submitted on paper forms? (Version 5-2012). (posted 01/11/17)

A prior submission cannot be amended directly in this application. An operator would just resubmit the entire amended *Completion Report* through the eSubmission system.

14. If one user begins a submission (*Completion Report, etc.*), can another user (one with signing authority) log in and finish or submit the report?

The eSubmission application only receives completed uploads. An operator can establish any system it chooses for preparing the documents prior to submission DEP. (posted 01/11/17)

15. Does the AOR have to be completed, submitted, and accepted prior to applying for a drill permit?

The AOR does not have to be submitted or completed prior to applying for a drill permit. It is due 30 days prior to well spud or submitted at the same time as the well permit if the operator intends to spud a well within 30 days of permit issuance. (posted 01/11/17)

16. Is Completions Reporting now located in the e-submission dashboard instead of its own application? Has the document changed?

Yes, the completion report is now located in the eSubmission application. The Completion Report has slightly changed and can be found [here](#). (posted 01/11/17)

17. How long does it normally take to gain authorized access to eSubmissions after submitting an approval request?

The length of time depends on how quickly the company Electronic Filing Administrator processes the user request. (posted 01/11/17)

18. In the example forms you reviewed, when submitting a county and municipality, how will eSubmissions handle projects that span county/township lines?

Operators should select the county or township that is associated to the latitude and longitude that the operator wrote on the Well Development Impoundment Registration, Tank Registration or Borrow Pit Registration. (posted 01/11/17)

19. Will applications also be e-submitted? For example; An Application for a Permit to Drill, Operate or Alter an Oil or Gas Well.

Unconventional well permit applications must be submitted through the eWell application. (posted 01/11/17)

20. Can the AOR and the drill permit application be submitted simultaneously?

No, the drill permit application must be submitted in eWell. For new wells, Operators will be provided the API number once the application is received by DEP. The AOR will be submitted through eSubmission Application. (posted 01/11/17)

21. For Well Development Impoundments (FWI) existing prior to the rulemaking, will the form need to be completed and uploaded of each impoundment?

Please see the "General Chapter 78a" FAQ document located [here](#) for a discussion of requirements relating to existing well development impoundments, including impoundment registration. (posted 01/11/17)

22. For well completion reporting does an operator upload the Word document through eSubmission or through the Well Completion Report button on the dashboard? It exists in both places.

The Well Completion Report must be submitted within the eSubmission application. The Well Completion Report application was taken offline. (posted 01/11/17)

23. Does the engineering company get an operator ID or just the individual who submits the permits?

The operator ID is associated to the entity who is applying for a permit. (posted 01/11/17)

24. Is the EFA is someone from the Operator/Applicant? Or from DEP? In the case of consultants, they would have to get permission through the EFA to access the "e.." sites, correct?

The EFA is the electronic filing administrator for the operator/applicant. Consultants would have to be granted permission by the company's EFA to access the electronic applications on behalf of that operator. (posted 01/11/17)

25. For the pre-drill survey report submission, what if an operator has multiple samples from one report?

Please see the eSubmission application guide for instruction on how to submit pre-drill water survey results [here](#). (posted 01/11/17)

26. During the eWell session earlier this morning it was stated that .pdf is not an acceptable format for plat submission, but for the AOR submission, .pdf was the only option? Do I understand this correctly?

Yes, the AOR submission requires .pdf and permit application requires a .dwg file. (posted 01/11/17)

27. Will the AOR Summary Reports be able to be edited in the event there is a change that may add to what is reported via the AOR process?

The specific AOR submission cannot be amended in this application. An operator would just resubmit a complete but amended AOR Summary Report. (posted 01/11/17)

28. If an operator has been submitting pre-drill data for a survey via disk prior to October 8, 2016, does that operator have to submit all the data again as of Monday October 10, 2016 via eSubmission?

No, only pre-drill surveys conducted after October 8, 2016 need to be submitted via eSubmission. (posted 01/11/17)

29. Is there any grace period or grandfathering to start using the new forms?

Any transition periods for specific portions of the regulations have been indicated in the regulatory language or associated training materials. DEP recommends close coordination with oil and gas district personnel early in the implementation period. (posted 01/11/17)

30. Will the Department enable operators to be able to upload Excel files for completion reports and well records (e.g. perforation record, stimulation data)? For wells with a significant number of stages, it will be tedious to individually enter a large quantity of data that has been previously captured in a spreadsheet.

The completion report and well record are required to be submitted by upload as a pdf file. However, Excel files can be saved as pdf files relatively easily and uploaded in that format through the eSubmission application. This would allow operators to track and record the required information using the Excel program if they so choose. (posted 01/11/17)

eNOTIFICATION

1. Where does an operator access eNotification and how does an operator gain access?

DEP notifications are made through the Oil and Gas Reporting Electronic (OGRE) application. Users will have to register first for a DEPGreenPort account. Once registered, the user would then enroll in the OGRE application. Once enrolled, the user would fill out the User Registration and send it to the company's Electronic Filing Administrator. (posted 01/11/17)

2. For notifications submitted, will an operator be able to see the status of that notification, for example, reviewed, approved, completed?

For DEP notifications, emails are only sent to appropriate DEP staff. There is no status associated with the eNotifications. (posted 01/11/17)

3. Is the notice of pollution or diminution of water supply treated the same as a phone call from a member of the public about a water problem?

Yes. (posted 01/11/17)

4. Is the well communication incident guidance document available on the website?

The well communication incident guidance can be found in the *AOR TGD*, posted [here](#). (posted 01/11/17)

5. Will the DEP GreenPort notification of returning a well from Inactive status to Active displace the need to complete the *Notification of Return of Well(s) to Active Status*, form 8000-FM-OOGM0123 in PADEP's eLibrary?

There is no regulatory requirement for the electronic submission of *Notification of Return of Well(s) to Active Status*, although it is allowed. Operators have the option to complete the paper form or making the electronic notification. (posted 01/11/17)

6. The regulation requires notification of a confirmed well communication incident. Confirmation of some events could take more than 2 hours, so the notice that it is beyond 2 hours is concerning. DEP will have to be aware that a notice of violation should not be written just because an alert shows that the notification is beyond a prescribed period of time, since the time it took to confirm an incident, per the regulation, may put an operator beyond the 2-hour timeframe.

In cases where an operator is otherwise made aware of a "confirmed" communication incident, the date and time provided should be associated with the timing of the confirmation, not the actual event. Timing of the confirmation could vary depending on the circumstances. Incidents requiring 2-hour notifications are those that are observed to be causing environmental, safety, or well control concerns; communication incidents with abandoned, orphan, or plugged wells; or incidents indicated by evidence of abnormal fracture propagation at the well being stimulated. Operators should commence the notification and response process as soon as possible, as these incidents represent the most serious of those defined in the *AOR TGD*, available [here](#). (posted 01/11/17)

7. Are well communication incident notifications required absent of AOR? That is, are currently permitted wells not subject to this notification requirement?

The answer depends on when hydraulic fracturing commenced on the unconventional well. The well communication incident notification is required for currently permitted wells where hydraulic fracturing had not commenced prior to the promulgation date of October 8, 2016. If hydraulic fracturing had commenced prior to promulgation and an incident occurs that results in any violations of regulations and laws in place prior to promulgation, operators are still required to notify DEP under the existing provisions, but do not need to follow the established incident notification process specific the *AOR* regulations. (posted 01/11/17)

8. For drill cuttings, do we need to submit time for each roll-off that goes to a landfill or just the initial roll-off per individual well?

The drill cuttings notification is only required for onsite disposal of drill cuttings in accordance with section 78a.61. (posted 01/11/17)

9. Can you reiterate the differences between the 2-hour and the 4-hour well communication reporting incidents?

Please see the AOR TGD [here](#). (posted 01/11/17)

10. Will the DEP GreenPort notification of notice of intent to plug a well displace the need to complete the eLibrary *Notice of Intention by Well Operator to Plug a Well*, form 8000-FM-OOGM0005 physical form?

No, they are separate requirements within the statute and within the regulations. Operators will need to submit both the notification and the *Notice of Intention by Well Operator to Plug a Well* paper form. (posted 01/11/17)

11. Are the notifications and submissions required for natural gas distribution line crossings?

No, electronic notifications are not required for natural gas distribution lines. (posted 01/11/17)