



Hakes C&D Disposal, Inc.

February 22, 2018

Ms. Yasmin Guevara
NYSDEC Division of Solid and Hazardous Materials – Region 8
6274 Avon-Lima Rd.
Avon, New York 14414-9516

**RE: Hakes C&D Disposal, Inc.
Hakes C&D Landfill
Oil & Gas Waste Received from Pennsylvania-Correction
Permit ID: 8-4630-00010/00001**

Dear Ms. Guevara,

Hakes C&D Disposal, Inc. (Hakes) is herein submitting the following information regarding waste received from Oil & Gas Companies operating in Pennsylvania at the Hakes C&D Landfill.

It was brought to Hakes attention that the Pennsylvania Department of Environmental Protection's (PADEP) online records (PA DEP Oil & Gas Reporting Website - Production / Waste Reports) indicate that wastes classified as "fracturing fluid waste", "drilling fluid", and "produced fluid" were delivered to Hakes Landfill in 2011-2012 by EOG Resources, LLC (EOG), SWEPI LP (SWEPI), and Campbell Oil and Gas, Inc (Campbell O&G).

After a review of the PADEP records, Hakes contacted EOG, SWEPI, and Campbell O&G. In each case, the Oil and Gas Operator incorrectly reported the type of waste delivered to Hakes Landfill or listed the incorrect destination facility for the waste.

For EOG, the PADEP Oil & Gas Reporting Website was reporting 214 tons of fracturing fluid waste in 2011 delivered to Hakes Landfill. A section of the database is listed below.

Fracturing Fluid Waste (in Tons)	EOG RESOURCES INC	2011-2	Tons	10
				146
				8
				26
				24

EOG responded to Hakes' inquiry regarding the 2011 reporting of fracturing fluid waste (see attached email) noting that those entries were listed in error and should have been listed as drill cuttings. EOG has contacted PADEP to correct this reporting error.

SWEPI had one entry in the PADEP Oil & Gas Reporting Website showing 220 barrels of drilling fluid waste in 2012 delivered to Hakes Landfill. A section of the database showing that entry is listed below.

Drilling Fluid Waste (in Barrels)	SWEPI LP	2012-1	Bbl	220
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SWEPI responded to Hakes' inquiry regarding the 2012 entry of drilling fluid waste (see attached letter) noting that entry should be classified as drill cuttings, not drilling fluid waste. SWEPI has contacted PADEP to correct this reporting error.

Campbell O&G has one entry in the PADEP Oil & Gas Reporting Website showing 80 barrels of produced fluid that was delivered to Hakes Landfill in 2012. The database entry is shown below.

Produced Fluid (in Barrels)	CAMPBELL OIL & GAS INC	2012-0	Bbl	80
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Campbell O&G responded to Hakes' inquiry regarding the 2012 produced fluid entry (see attached letter) stating that they did not bring any fluid to Hakes Landfill at any time and that the entry into the Oil & Gas Reporting Website should have listed Hart Resource Technologies in Pennsylvania, not Hakes Landfill. Campbell O&G contacted PADEP to correct the reporting error. At the time of this letter, there are no entries in the Oil & Gas Reporting Website showing waste received at Hakes Landfill from Campbell Oil & Gas.

If there is any further information that you require or if you have any questions, please contact me at (814) 335-5183 or at lance.stevens@casella.com.

Sincerely,

Hakes C&D Disposal, Inc.



Lance Stevens
Environmental Manager

Enclosures

Cc: B. Kras – Casella
L. Shilling- Casella
K. Flanders – Casella

Lance Stevens

From: Larry Shilling
Sent: Sunday, February 18, 2018 7:32 AM
To: Nathan Wells
Cc: Lance Stevens; Karen Flanders
Subject: Re: Hakes Landfill Reporting

Sounds good. Thanks for your help!

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From: Nathan Wells <Nathan_Wells@eogresources.com>
Sent: Saturday, February 17, 2018 9:37:14 AM
To: Larry Shilling
Cc: Lance Stevens; Karen Flanders
Subject: RE: Hakes Landfill Reporting

Hey Larry,

I wanted to give you an update on where we are with the DEP reporting from 2011. Going through our records we do show that we hauled drill cuttings to Hakes Landfill on those dates in 2011. We have sent an email to the DEP asking them to re-open those reports and allow us to change them from "Fracturing Fluid Waste" to "Drill Cuttings". They responded and said it would be tough, but they'd let us do it. However, they didn't want to try it on the Friday of a holiday weekend so we're going to do it on Tuesday. I'll keep you updated as we hear back from the Department.

Thanks,

Nathan



Nathan Wells
Sr. Safety & Environmental Representative
EOG Resources, Inc.
724-403-9927 (Office)
412-309-3792 (Cell)

From: Larry Shilling [mailto:Larry.Shilling@casella.com]
Sent: Thursday, February 15, 2018 1:07 PM
To: Nathan Wells
Cc: Lance Stevens; Karen Flanders
Subject: Hakes Landfill Reporting

** External email. Use caution. **

Nathan, I appreciate you looking into this. Below is the information that was reported to have come to the Hakes Landfill.

Well Permit	Period	Reporting Period	Well Status	Farm Well	Spud Date	Waste Type	Waste Quantity
015-20279	2011-2	Jul - Dec 2011 (Marcellus Only, 6 months)	Active	HOPPAUGH 2H 2H	04/01/2010	Fracturing Fluid Waste (in Tons)	10.00
015-20281	2011-2	Jul - Dec 2011 (Marcellus Only, 6 months)	Active	GUINAN 2H 2H	04/26/2010	Fracturing Fluid Waste (in Tons)	146.00
015-20289	2011-2	Jul - Dec 2011 (Marcellus Only, 6 months)	Active	JENKINS 1H 1H	04/07/2010	Fracturing Fluid Waste (in Tons)	8.00
015-21125	2011-2	Jul - Dec 2011 (Marcellus Only, 6 months)	Active	JACKSON 1H 1H	09/24/2010	Fracturing Fluid Waste (in Tons)	26.00
015-21133	2011-2	Jul - Dec 2011 (Marcellus Only, 6 months)	Active	BEARDSLEE 2H 2H	11/13/2010	Fracturing Fluid Waste (in Tons)	24.00

Larry Shilling

VP LF Marketing & Business Development
Casella Waste Systems, Inc.

6653 Herdman Rd.
Angelica, NY 14709
p. 585.466.7271 | c. 716.560.7915 | w. casella.com



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SWEPI LP

150 North Dairy Ashford Road, E1296D
Houston, TX 77079
tim.w.smith@shell.com
832-337-0152

February 19, 2018

Larry Shilling
VP LF marketing & Business Development
Casella Waste Systems, Inc.
6653 Herdman Road
Angelica, NY 14706

RE: Waste Disposal at Hakes C&D Landfill
January 2012 – June 2012

Dear Mr. Shilling:

It has come to my attention that the Pennsylvania Department of Environmental Protection's (PADEP) semi-annual waste report for January 1, 2012 through June 30, 2012, contains an entry indicating that SWEPI LP disposed of 220 bbls of drilling fluid waste within Hakes C&D Landfill. SWEPI LP has reviewed their records and has identified that the waste transported to, and disposed of within, the Hakes C&D Landfill consisted of drill cutting not drilling fluid.

SWEPI LP will work with the PADEP to fix the error in the 2012 semi-annual reporting for the first half of 2012.

Sincerely,

Timothy W. Smith, PE
Sr. Environmental Regulatory Engineer



February 13, 2018

Mr. Larry Shilling
VP LF Marketing & Business Development
Casella Waste Systems, Inc.
6653 Herdman Road
Angelica, NY 14709

**RE: Correction of Brine Fluid Disposal Reporting in 2012
Roger Young #3 Conventional Gas Well
API # 37-033-25598**

Mr. Shilling,

After a thorough review of our 2012 Brine Disposal Records, it appears there was a reporting error.

Brine from our above referenced conventional natural gas well was disposed at the Hart Resources Technologies treatment facility located in Pennsylvania. A copy of that manifest is attached. The manifest shows that 3,360 gallons (80 bbls) of brine fluid was disposed on 10/31/2012 at the Hart facility.

Our records show that no fluid was ever transported to your facility in New York State.

We are also in the process of correcting this reporting error with the PA Department of Environmental Protection.

If you have any questions or comments, please do not hesitate to contact me at your convenience.

Sincerely,

CAMPBELL OIL & GAS, INC.

David S. Miller
Operations Manager

Attachment