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west virginia department of environmental protection

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Office of Oil and Gas  
601 57<sup>th</sup> Street, S.E.  
Charleston, WV 25304  
(304) 926-0450  
fax: (304) 926-0452

Austin Caperton, Cabinet Secretary  
[www.dep.wv.gov](http://www.dep.wv.gov)

Wednesday, October 14, 2020  
WELL WORK PERMIT  
Vertical / New Drill

PEPPER DEVELOPMENT, LLC  
P O BOX 569  
CLARKSBURG, WV 26302

Re: Permit approval for J. S. ZINN 2  
47-001-03363-00-00

This well work permit is evidence of permission granted to perform the specified well work at the location described on the attached pages and located on the attached plat, subject to the provisions of Chapter 22 of the West Virginia Code of 1931, as amended, and all rules and regulations promulgated thereunder, and to any additional specific conditions and provisions outlined in the pages attached hereto. Notification shall be given by the operator to the Oil and Gas Inspector at least 24 hours prior to the construction of roads, locations, and/or pits for any permitted work. In addition, the well operator shall notify the same inspector 24 hours before any actual well work is commenced and prior to running and cementing casing. Spills or emergency discharges must be promptly reported by the operator to 1-800-642-3074 and to the Oil and Gas Inspector.

Please be advised that form WR-35, Well Operators Report of Well Work is to be submitted to this office within 90 days of completion of permitted well work, as should form WR-34 Discharge Monitoring Report within 30 days of discharge of pits, if applicable. Failure to abide by all statutory and regulatory provisions governing all duties and operations hereunder may result in suspension or revocation of this permit and, in addition, may result in civil and/or criminal penalties being imposed upon the operators.

Per 35 CSR 4-5.2.g this permit will expire in two (2) years from the issue date unless permitted well work is commenced. If there are any questions, please feel free to contact me at (304) 926- 0450.

  
James A. Martin  
Chief

Operator's Well Number: J. S. ZINN 2  
Farm Name: WILLIAM M. COMPTON  
U.S. WELL NUMBER: 47-001-03363-00-00  
Vertical New Drill  
Date Issued: 10/14/2020

## PERMIT CONDITIONS

West Virginia Code §22-6-11 allows the Office of Oil and Gas to place specific conditions upon this permit. Permit conditions have the same effect as law. Failure to adhere to the specified permit conditions may result in enforcement action.

### CONDITIONS

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1. If the operator encounters an unanticipated void, or an anticipated void at an unanticipated depth, the operator shall notify the inspector within 24 hours. Modifications to the casing program may be necessary to comply with W. Va. Code §22-6-20, which requires drilling to a minimum depth of thirty feet below the bottom of the void, and installing a minimum of twenty (20) feet of casing. Under no circumstance should the operator drill more than fifty (50) feet below the bottom of the void or install less than twenty (20) feet of casing below the bottom of the void.
2. Pursuant to 35 CSR 4-19.1.a, at the request of the surface owner all water wells or springs within 1000 feet of the proposed well that are actually utilized for human consumption, domestic animals or other general use shall be sampled and analyzed.
3. Pursuant to 35 CSR 4-19.1.c, if the operator is unable to sample and analyze any water well or spring with one thousand (1,000) feet of the permitted well location, the Office of Oil and Gas requires the operator to sample, at a minimum, one water well or spring located between one thousand (1,000) feet and two thousand (2,000) feet of the permitted well location.
4. All pits must be lined with a minimum of 20 mil thickness synthetic liner.
5. In the event of an accident or explosion causing loss of life or serious personal injury in or about the well or while working on the well, the well operator or its contractor shall give notice, stating the particulars of the accident or explosion, to the oil and gas inspector and the Chief within twenty-four (24) hours.
6. During the surface casing and cementing process, in the event cement does not return to the surface, or any other casing string that is permitted to circulate cement to the surface and does not return to the surface, the oil and gas inspector shall be notified within twenty-four (24) hours.
7. Well work activities shall not constitute a hazard to the safety of persons.
8. Operator shall provide the Office of Oil & Gas notification of the date that drilling commenced on this well. Such notice shall be provided by sending an email to [DEPOOGNotify@wv.gov](mailto:DEPOOGNotify@wv.gov) within 30 days of commencement of drilling.

Check # 389  
\$550.00  
10/9/2020

4700103363

**STATE OF WEST VIRGINIA**  
**DEPARTMENT OF ENVIRONMENTAL PROTECTION, OFFICE OF OIL AND GAS**  
**WELL WORK PERMIT APPLICATION**

1) Well Operator: Pepper Development, LLC

49448119	Barbour	Elk	Brownnton
Operator ID	County	District	Quadrangle

2) Operator's Well Number: J. S. Zinn #2      3) Elevation: 1342.5

4) Well Type: (a) Oil  or Gas   
 (b) If Gas: Production  / Underground Storage \_\_\_\_\_  
 Deep \_\_\_\_\_ / Shallow

*SOW*  
*10/8/2020*

5) Proposed Target Formation(s): Haverty Proposed Target Depth: 5713  
 6) Proposed Total Depth: 5975 Feet Formation at Proposed Total Depth: Haverty  
 7) Approximate fresh water strata depths: 423'  
 8) Approximate salt water depths: N/A

9) Approximate coal seam depths: 219'-225'; 425'-428'; 917'-920'; 1012'-1015'

10) Approximate void depths, (coal, Karst, other): \_\_\_\_\_

11) Does land contain coal seams tributary to active mine? No

12) Describe proposed well work and fracturing methods in detail (attach additional sheets if needed)  
Drilling new well. Plan to fracture and stimulate multiple formations from the Gantz to Haverty.

**13) CASING AND TUBING PROGRAM**

TYPE	SPECIFICATIONS			FOOTAGE INTERVALS		CEMENT
	Size	Grade	Weight per ft	For Drilling	Left in Well	
Conductor	11.75"	J-55	42	44	44	
Fresh Water	8.625"	J-55	41	1200'	1200'	CTS
Coal						
Intermediate						
Production	4 1/2"	WTC80	11.6	5975	5975	CTS
Tubing						
Liners						

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Packers: Kind: \_\_\_\_\_  
 Sizes: \_\_\_\_\_  
 Depths Set \_\_\_\_\_

WW-2A  
(Rev. 6-14)

1.) Date: 9/5/19  
2.) Operator's Well Number J. S. Zinn #2  
State County Permit  
3.) API Well No.: 47- Barbour -

**STATE OF WEST VIRGINIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION, OFFICE OF OIL AND GAS  
NOTICE AND APPLICATION FOR A WELL WORK PERMIT**

4) Surface Owner(s) to be served:  
(a) Name William Compton **WAIVER** ✓  
Address PO Box 569  
Clarksburg, WV 26302  
(b) Name \_\_\_\_\_  
Address \_\_\_\_\_  
(c) Name \_\_\_\_\_  
Address \_\_\_\_\_  
5) (a) Coal Operator  
Name \_\_\_\_\_  
Address \_\_\_\_\_  
(b) Coal Owner(s) with Declaration  
Name \_\_\_\_\_  
Address \_\_\_\_\_  
(c) Coal Lessee with Declaration  
Name \_\_\_\_\_  
Address \_\_\_\_\_

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**TO THE PERSONS NAMED ABOVE TAKE NOTICE THAT:**

       Included is the lease or leases or other continuing contract or contracts by which I hold the right to extract oil and gas

OR  
  X   Included is the information required by Chapter 22, Article 6, Section 8(d) of the Code of West Virginia (see page 2)

I certify that as required under Chapter 22-6 of the West Virginia Code I have served copies of this notice and application, a location plat, and accompanying documents pages 1 through        on the above named parties by:

- Personal Service (Affidavit attached)
- Certified Mail (Postmarked postal receipt attached)
- Publication (Notice of Publication attached)

I have read and understand Chapter 22-6 and 35 CSR 4, and I agree to the terms and conditions of any permit issued under this application.

I certify under penalty of law that I have personally examined and am familiar with the information submitted on this application form and all attachments, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate and complete.

I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Well Operator: Pepper Development, LLC  
By: William M. Compton *[Signature]*  
Its: Owner  
Address: PO Box 569  
Clarksburg, WV 26302  
Telephone: 304-457-5800  
Email: iwcompton@frontier.com

Subscribed and sworn before me this 9<sup>th</sup> day of October 2020, Pepper Development, LLC

My Commission Expires February 19, 2025  
Oil and Gas Privacy Notice *ADW*

*[Signature: Amanda D. Watson]*  
Notary Public

Notary Public



OFFICIAL SEAL  
NOTARY PUBLIC  
STATE OF WEST VIRGINIA  
AMANDA D. WATSON  
259 Hanson Street  
Buckhannon, WV 26201  
My Commission Expires February 19, 2025

The Office of Oil and Gas processes your personal information, such as name, address and phone number, as a part of our regulatory duties. Your personal information may be disclosed to other State agencies or third parties in the normal course of business or as needed to comply with statutory or regulatory requirements, including Freedom of Information Act requests. Our office will appropriately secure your personal information. If you have any questions about our use of your personal information, please contact DEP's Chief Privacy Officer at [depprivacyofficer@wv.gov](mailto:depprivacyofficer@wv.gov)



**SURFACE OWNER WAIVER**

County Barbour

Operator  
Operator well number

Pepper Development, LLC  
J. S. Zinn #2

**INSTRUCTIONS TO SURFACE OWNERS NAMED ON PAGE WW2-A**

The well operator named on page WW2A is applying for a permit from the State to do oil or gas well work. (Note: If the surface tract is owned by more than three persons, then these materials were served on you because your name appeared on the Sheriff's tax ticket on the land or because you actually occupy the surface tract. In either case, you may be the only owner who will actually receive these materials.) See Chapter 22 of the West Virginia Code. Well work permits are valid for 24 months. If you do not own any interest in the surface tract, please forward these materials to the true owner immediately if you know who it is. Also, please notify the well operator and the Office of Oil and Gas.

**NOTE: YOU ARE NOT REQUIRED TO FILE ANY COMMENT.**

**WHERE TO FILE COMMENTS AND OBTAIN ADDITIONAL INFORMATION:**

Chief, Office of Oil and Gas  
Department of Environmental Protection  
601 57<sup>th</sup> St. SE  
Charleston, WV 25304  
(304) 926-0450

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**Time Limits and methods for filing comments.** The law requires these materials to be served on or before the date the operator files his Application. You have **FIFTEEN (15) DAYS** after the filing date to file your comments. Comments must be filed in person or received in the mail by the Chief's office by the time stated above. You may call the Chief's office to be sure of the date. Check with your postmaster to ensure adequate delivery time or to arrange special expedited handling. If you have been contacted by the well operator and you have signed a "voluntary statement of no objection" to the planned work described in these materials, then the permit may be issued at any time.

**Comments must be in writing.** Your comments must include your name, address and telephone number, the well operator's name and well number and the approximate location of the proposed well site including district and county from the application. You may add other documents, such as sketches, maps or photographs to support your comments.

The Chief has the power to deny or condition a well work permit based on comments on the following grounds:

- 1) The proposed well work will constitute a hazard to the safety of persons.
- 2) The soil erosion and sediment control plan is not adequate or effective;
- 3) Damage would occur to publicly owned lands or resources;
- 4) The proposed well work fails to protect fresh water sources or supplies;
- 5) The applicant has committed a substantial violation of a previous permit or a substantial violation of one or more of the rules promulgated under Chapter 22, and has failed to abate or seek review of the violation..."

**If you want a copy of the permit as it is issued or a copy of the order denying the permit, you should request a copy from the Chief.**

**List of Water Testing Laboratories.** The Office maintains a list of water testing laboratories which you can hire to test your water to establish water quality prior to and after drilling. Contact the Chief to obtain a copy.

**VOLUNTARY STATEMENT OF NO OBJECTION**

I hereby state that I have read the instructions to surface owners and that I have received copies of a Notice and Application for a Well Work Permit on Form WW2-A, and attachments consisting of pages 1 through \_\_\_ including a work order on Form WW2-B, a survey plat, WW-9, and a soil and erosion plan, all for proposed well work on my surface land as described therein.

I further state that I have no objection to the planned work described in these materials, and I have no objection to a permit being issued on those materials.

FOR EXECUTION BY A NATURAL PERSON

FOR EXECUTION BY A CORPORATION, ETC.

  
Signature

Date \_\_\_\_\_

Company Name \_\_\_\_\_  
By \_\_\_\_\_  
Its \_\_\_\_\_ Date \_\_\_\_\_

Print Name

Signature

Date

COAL OPERATOR, OWNER, OR LESSEE WAIVER

County Barbour  
Operator Pepper Development, LLC

Operator's Well Number J. S. Zinn #2

INSTRUCTIONS TO COAL OPERATOR, OWNER, OR LESSEE

To the coal operator, owner, or lessee named on page WW2-A. You are hereby notified that any objection you wish to make or are required to make by WV Code 22-6-15, 16 or 17, must be filed with the Chief of the Office of Oil and Gas within fifteen (15) days after the receipt of this application by the Office. Mail objections to:

Chief, Office of Oil and Gas  
Department of Environmental Protection  
601 57<sup>th</sup> St. SE  
Charleston, WV 25304  
(304) 926-0499 extension 1654

WAIVER

The undersigned coal operator \_\_\_\_/ owner \_\_\_\_/ lessee \_\_\_\_/ of the coal under this well location has examined this proposed well location. If a mine map exists which covers the area of well location, the well location has been added to the mine map. The undersigned has no objection to the work proposed to be done at this location, provided, the well operator has complied with all applicable requirements of the West Virginia Code and the governing regulations.

FOR EXECUTION BY A NATURAL PERSON

FOR EXECUTION BY A CORPORATION, ETC.

William M. Compton Date \_\_\_\_\_  
Signature

Company Name \_\_\_\_\_  
By \_\_\_\_\_  
Its \_\_\_\_\_ Date \_\_\_\_\_

Signature \_\_\_\_\_ Date \_\_\_\_\_

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**INFORMATION SUPPLIED UNDER WEST VIRGINIA CODE  
Chapter 22, Article 6, Section 8(d)  
IN LIEU OF FILING LEASE(S) AND OTHER CONTINUING CONTRACT(S)**

Under the oath required to make the verification on page 1 of this Notice and Application, I depose and say that I am the person who signed the Notice and Application for the Applicant, and that –

- (1) the tract of land is the same tract described in this Application, partly or wholly depicted in the accompanying plat, and described in the Construction and Reclamation Plan;
- (2) the parties and recordation data (if recorded) for lease(s) or other continuing contract(s) by which the Applicant claims the right to extract, produce or market the oil or gas are as follows:

Grantor, Lessor, etc.	Grantee, Lessee, etc.	Royalty	Book/Page
Robert Green, John Green, Melvin R Woodford, Trustees for Mount Olive Cemetary	Petroleum Development Corp.	0.125	6/111
Assignment attached	Pepper Development, LLC		

**Acknowledgement of Possible Permitting/Approval  
In Addition to the Office of Oil and Gas**

The permit applicant for the proposed well work addressed in this application hereby acknowledges the possibility of the need for permits and/or approvals from local, state, or federal entities in addition to the DEP, Office of Oil and Gas, including but not limited to the following:

- WV Division of Water and Waste Management
- WV Division of Natural Resources
- WV Division of Highways
- U.S. Army Corps of Engineers
- U.S. Fish and Wildlife Service
- County Floodplain Coordinator

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The applicant further acknowledges that any Office of Oil and Gas permit in no way overrides, replaces, or nullifies the need for other permits/approvals that may be necessary and further affirms that all needed permits/approvals should be acquired from the appropriate authority before the affected activity is initiated.

Well Operator:  
By: Its:

Pepper Resources  
William M. Compton   
Owner

ASSIGNMENT

THIS ASSIGNMENT (this "Assignment") from PDC Mountaineer, L.L.C., a Delaware limited liability company, with an address of 120 Genesis Boulevard, Bridgeport, West Virginia 26330 ("Assignor"), to Pepper Development, L.L.C., a West Virginia limited liability company, with an address at P. O. Box 569, Clarksburg, West Virginia 26302 ("Assignee"), is executed on the dates set forth in the respective notary certifications below, but effective for all purposes as of 7:00 A.M., Eastern Time, June 20, 2011 (the "Effective Time").

RECITALS

Assignor owns certain undivided interests in and to the Property (as defined below).

It is the intent of Assignor to transfer, and the intent of Assignee to acquire, the Property, subject to the further terms and conditions of this Assignment.

NOW, THEREFORE, in consideration of the transactions contemplated, and the covenants and promises herein contained, and other good and valuable consideration, the receipt and sufficiency of which are hereby acknowledged, the parties hereto agree as follows:

ASSIGNMENT

I. Assignment. Assignor, for and in consideration of the sum of Ten Dollars (\$10,000) cash and other good and valuable consideration, in hand paid, the receipt and sufficiency of which is hereby acknowledged, hereby GRANTS, BARGAINS, SELLS, AND CONVEYS, and by these presents has GRANTED, BARGAINED, SOLD, AND CONVEYED unto Assignee the following described real properties, rights and interests located in Taylor County, West Virginia (collectively, the "Property");

The oil and gas leases described on **Exhibit A** (the "Leases"), whether or not Assignor's interests in the Leases are correctly or sufficiently described in **Exhibit A**, and the nonexclusive right, in conjunction with Assignor's rights, to all covenants, agreements, easements, rights of way, surface rights, permits, licenses, wells and appurtenant equipment associated with or related to the Leases or useful in the operation thereof.

It is the intent of Assignor to convey and this Assignment hereby conveys to Assignee, all of Assignor's right, title, and interest, from and after the Effective Time, in and to all of the Property, regardless of the omission of any lease or leases, errors in description or specification of any interests in any of the Property, any incorrect or misspelled names or any transcribed or incorrect recording references.

It is further the intent of the Assignor to convey the well bore to the Lake Zinn #1 Well, API # 47-001-02672 located on the Property, together with all rights, benefits and obligations associated with said well, including but limited to reasonable rights of ingress and egress, right to

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c) There is further excepted and reserved from this assignment all formations below 100 feet from the top of the Marcellus Shale. The Assignor hereby grants and assigns to the Assignee a "Right of First Refusal to Lease" the herein excepted and reserved formations for a period not to exceed ~~three (3) years~~ from the Effective Date of this Agreement for a sum equal to Five Hundred Dollars (\$500,000) per leased acre.

*eighteen (18) months*



TO HAVE AND TO HOLD the Property unto Assignee, its successors and assigns, forever, subject, however, to the terms and conditions of this Assignment.

2. **Special Warranty.** Assignor warrants title to the Property, unto Assignee, its successors and assigns, against all persons claiming or to claim the same or any part thereof by, through, or under Assignor, but not otherwise. **EXCEPT AS PROVIDED IN THE PRECEDING SENTENCE, ASSIGNOR MAKES NO, AND EXPRESSLY DISCLAIMS AND NEGATES ANY, REPRESENTATION OR WARRANTY, EXPRESS OR IMPLIED, AS TO TITLE TO ANY OF THE PROPERTY.** Assignor hereby assigns to Assignee all rights, claims, and causes of action on title warranties given or made by Assignor's predecessors (other than Affiliates of Assignor), and Assignee is specifically subrogated to all rights which Assignor may have against its predecessors (other than Affiliates of Assignor), to the extent Assignor may legally transfer such rights and grant such subrogation.

3. **Disclaimer of Other Warranties.** Except as specifically represented otherwise in the Agreement, **ASSIGNOR MAKES NO, AND EXPRESSLY DISCLAIMS, ANY REPRESENTATION OR WARRANTY, EXPRESS OR IMPLIED, AT COMMON LAW, BY STATUTE OR OTHERWISE, CONCERNING OR RELATING TO THE PROPERTY, ASSIGNOR, OR MATERIALS OR INFORMATION THAT MAY HAVE BEEN MADE AVAILABLE OR COMMUNICATED TO ASSIGNEE OR ITS REPRESENTATIVES OR EMPLOYEES IN CONNECTION WITH THE TRANSACTION CONTEMPLATED HEREIN, AND FURTHER DISCLAIMS ANY REPRESENTATION OR WARRANTY, EXPRESS OR IMPLIED, OF MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE, OR CONFORMITY TO MODELS OR SAMPLES OF MATERIALS OF ANY EQUIPMENT, IT BEING EXPRESSLY UNDERSTOOD AND AGREED BY THE PARTIES HERETO THAT, EXCEPT AS EXPRESSLY PROVIDED HEREIN, THE PROPERTY IS BEING TRANSFERRED "AS IS, WHERE IS" WITH ALL FAULTS AND DEFECTS.**

4. **Further Assurances.** From and after the date hereof, Assignor, without further consideration, will use its reasonable good faith efforts to execute, deliver and (if applicable) file or record, or cause to be executed, delivered and filed or recorded, such good and sufficient instruments of conveyance and transfer, and take such other action as may be reasonably required of Assignor to effectively vest in Assignee beneficial and record title to the Property conveyed pursuant hereto (if applicable).

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IN WITNESS WHEREOF, this Assignment has been executed by each of the Parties as of the Effective Date.

ASSIGNOR:  
PDC MOUNTAINEER, LLC



By: \_\_\_\_\_  
Name: Deward W. Gierdom, Jr.  
Title: Chief Executive Officer

ASSIGNEE:  
Pepper Development, LLC



By: \_\_\_\_\_  
Name: William M. Compton  
Title: President



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EXHIBIT "A"

By and Between PDC Mountaineer, LLC and Pepper Development, LLC

June 20, 2011

Lessor: Mason V. Tallman as Trustee for the J. S. Zinn Estate

Lessee: Petroleum Development Corporation.

Date: March 9, 1996

District: Elk

County: Barbour

State: West Virginia

Acres: 81 acres

Recorded in the Office of the Clerk of the County Commission of Barbour County, State of West Virginia in Book 123 at Page 510.

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WW-2B1  
(5-12)

Well No. J. S. Zinn #2

West Virginia Department of Environmental Protection  
Office of Oil and Gas

NOTICE TO SURFACE OWNERS

The well operator named below is preparing to file for a permit from the state to drill a new well. Before a well work permit can be filed with the Chief of the Office of Oil and Gas, the well operator is required to have given notice of the right to request water well or spring analytical testing. This notice shall be given to the owners or occupants of land which have a water well or spring being utilized for human consumption, domestic animals, or other general use and which is located within 1000 feet of the proposed well site.

With this form, the operator is giving you notice of your right to request analytical testing. The operator is required to sample and analyze the water wells or springs of all owners or occupants who request it. Therefore, if you wish to have your water well or spring tested, contact the operator named below.

All sampling shall be completed prior to drilling. Within thirty (30) days of the receipt of such sample analyses the operator shall submit the results to the Chief of the Office of Oil and Gas and to the owners or occupants who may have requested them.

Be advised, you have the right to sample and analyze any water supply at your own expense.

Listed below is the laboratory chosen by operator to perform analysis, and contactor chosen to collect sample.

Certified Laboratory Name Sturm Environmental Services  
Sampling Contractor GCS Consulting, LLC

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Well Operator Pepper Development, LLC  
Address PO Box 569  
Clarksburg, WV 26302  
Telephone 304-457-5800

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FOR OPERATOR'S USE ONLY: Below, or on an attached page, list those persons which were given this notice. Place an asterisk beside the one(s) that contacted you and requested sampling and analyses. If there were no requests made, indicate by underling which one you have selected to sample and analyze. If there are no water wells or springs within 1000 feet of the proposed site, the Chief may require the operator to test wells up to 2000 feet from the proposed site.

*No Water Wells within 2000'*

STATE OF WEST VIRGINIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
OFFICE OF OIL AND GAS  
FLUIDS/ CUTTINGS DISPOSAL & RECLAMATION PLAN

Operator Name Pepper Development, LLC OP Code 494481119

Watershed (HUC 10) Tygart Valley Quadrangle Brownston

Do you anticipate using more than 5,000 bbls of water to complete the proposed well work? Yes  No

Will a pit be used? Yes  No

If so, please describe anticipated pit waste: Drilling and completion fluids

Will a synthetic liner be used in the pit? Yes  No  If so, what ml.? 20

Proposed Disposal Method For Treated Pit Wastes:

- Land Application (if selected provide a completed form WW-9-GPP)
- Underground Injection ( UIC Permit Number \_\_\_\_\_ )
- Reuse (at API Number \_\_\_\_\_ )
- Off Site Disposal (Supply form WW-9 for disposal location)
- Other (Explain \_\_\_\_\_)

Will closed loop system be used? If so, describe: No

Drilling medium anticipated for this well (vertical and horizontal)? Air, freshwater, oil based, etc. Air, freshwater RECEIVED  
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-If oil based, what type? Synthetic, petroleum, etc.

Additives to be used in drilling medium? water, soap, KCL OCT 9 2020

Drill cuttings disposal method? Leave in pit, landfill, removed offsite, etc. Leave in pit WV Department of  
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-If left in pit and plan to solidify what medium will be used? (cement, lime, sawdust) cement, lime and native soil

-Landfill or offsite name/permit number? \_\_\_\_\_

Permittee shall provide written notice to the Office of Oil and Gas of any load of drill cuttings or associated waste rejected at any West Virginia solid waste facility. The notice shall be provided within 24 hours of rejection and the permittee shall also disclose where it was properly disposed.

I certify that I understand and agree to the terms and conditions of the GENERAL WATER POLLUTION PERMIT issued on April 1, 2016, by the Office of Oil and Gas of the West Virginia Department of Environmental Protection. I understand that the provisions of the permit are enforceable by law. Violations of any term or condition of the general permit and/or other applicable law or regulation can lead to enforcement action.

I certify under penalty of law that I have personally examined and am familiar with the information submitted on this application form and all attachments thereto and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment.

Company Official Signature *William M. Compton*

Company Official (Typed Name) William M. Compton

Company Official Title Owner

Subscribed and sworn before me this 9<sup>th</sup> day of October

*Amanda D. Watson*

My commission expires February 19, 2025





Operator's Well No. J. S. Zinn #2

Proposed Revegetation Treatment: Acres Disturbed less than acre Prevegetation pH 6.0

Lime 2 Tons/acre or to correct to pH 6.5

Fertilizer type 10-20-20 or equivalent

Fertilizer amount 500# lbs/acre

Mulch hay/straw Tons/acre

Seed Mixtures

**Temporary**

**Permanent**

Seed Type	lbs/acre
<u>Contractors Mix</u>	<u>100</u>
_____	_____
_____	_____

Seed Type	lbs/acre
<u>Contractors Mix</u>	<u>100</u>
_____	_____
_____	_____

Attach:

Maps(s) of road, location, pit and proposed area for land application (unless engineered plans including this info have been provided). If water from the pit will be land applied, provide water volume, include dimensions (L, W, D) of the pit, and dimensions (L, W), and area in acres, of the land application area.

Photocopied section of involved 7.5' topographic sheet.

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Plan Approved by: [Signature]

Comments: \_\_\_\_\_

WV Department of  
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Title: OO&I Inspector

Date: 10/8/2020

Field Reviewed? (  ) Yes (  ) No

STATE OF WEST VIRGINIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
OFFICE OF OIL AND GAS  
GROUNDWATER PROTECTION PLAN

Operator Name: Pepper Development, LLC  
Watershed (HUC 10): Tygart Valley Quad: Brownnton  
Farm Name: Compton

1. List the procedures used for the treatment and discharge of fluids. Include a list of all operations that could contaminate the groundwater.

Drilling/completion pit fluids will be analyzed, treated, aerated and land applied (sprayed) in accordance with the specs provided by the Office of Oil and Gas. Fluids will NOT be allowed to puddle or pond. Solids will be dried/solidified and buried on site. Fresh water horizons will be drilled through on air, cased and cemented as quickly as possible. Spillage that may occur on site will be quickly contained and picked up.

2. Describe procedures and equipment used to protect groundwater quality from the list of potential contaminant sources above.

Pit(s) will be lined with 20 ml liner  
Pit fluid will be analyzed to select treatment and pit category  
Steel casing set across fresh water zones and cemented to surface  
Spill kits will be available on site

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WV Department of  
Environmental Protection

3. List the closest water body, distance to closest water body, and distance from closest Well Head Protection Area to the discharge area.

Elk Creek is the closest water body at over 1000 feet. Unable to locate any well head protection areas within this entire watershed. Public water supply comes Tygart Valley River and no groundwater public supply wells are used.

4. Summarize all activities at your facility that are already regulated for groundwater protection.

Pit construction, treatment and discharge  
Casing installed and cemented for freshwater zones protection  
Spill cleanup and reporting  
Tanks on site to hold any fluid excess

SDW  
10/18/2020

5. Discuss any existing groundwater quality data for your facility or an adjacent property.

We are not aware of any groundwater quality data for this site or adjacent property.

6. Provide a statement that no waste material will be used for deicing or fill material on the property.

No waste material will be used for fill or deicing on the well site.

7. Describe the groundwater protection instruction and training to be provided to the employees. Job procedures shall provide direction on how to prevent groundwater contamination.

Keep site and pit clean and free of debris  
Discuss pit treatment and discharge  
Discus how to dry/solidify pit solids  
Discuss anticipated fresh water zones to be incurred and quickly as possible set casing and cement  
Discuss spill prevention  
Discuss spill containment and cleanup- have the spill hotline number on site and the need to keep the Oil and Gas inspector notified

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8. Provide provisions and frequency for inspections of all GPP elements and equipment.

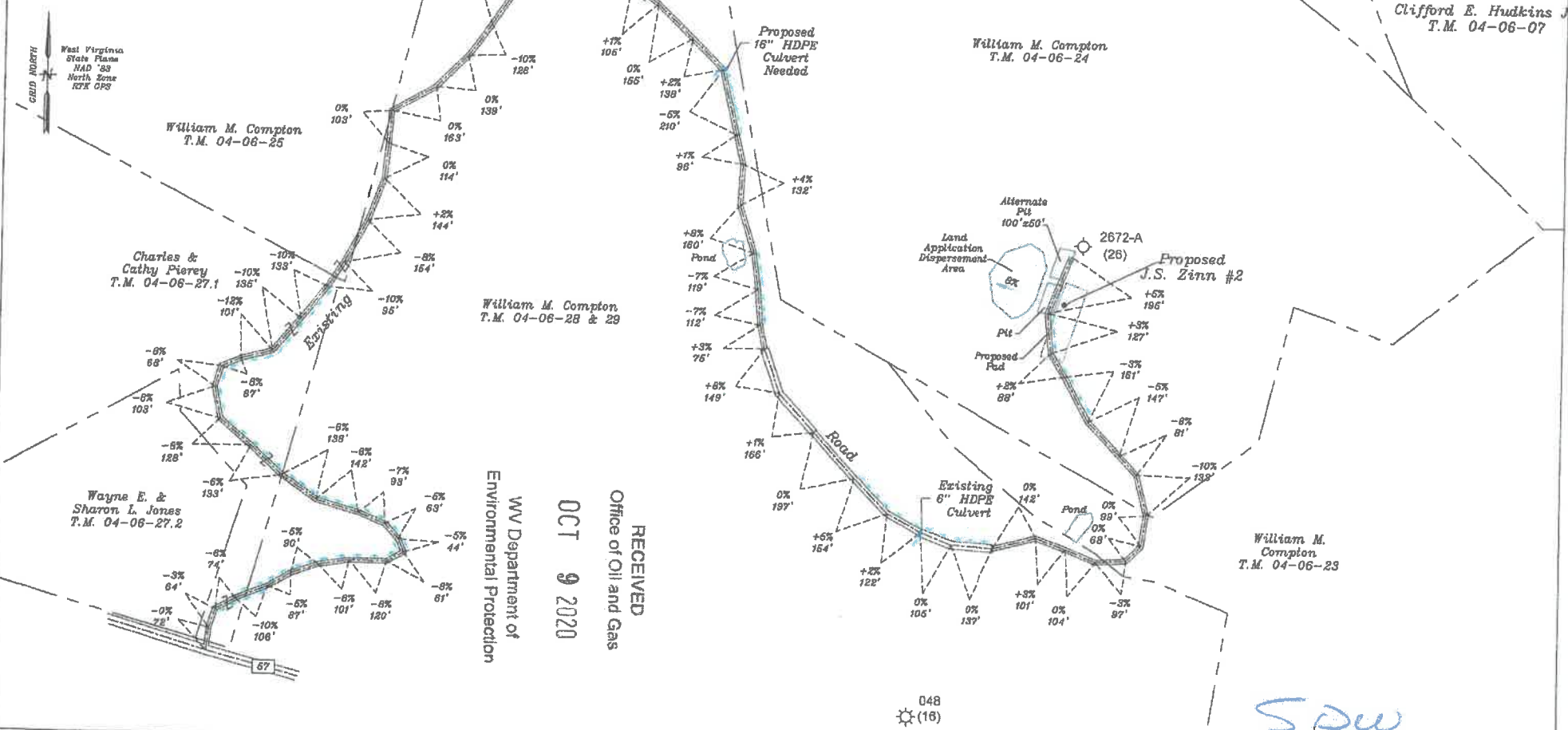
Inspections will be daily during the drilling through reclamation processes. Monitoring of the well will occur weekly or bi weekly.

Signature: [Signature]

Date: 10/8/2020

**CONSTRUCTION NOTES:**

1. Place brush downslope of disturbed areas.
2. Stockpile topsoil for use on exposed slopes during reclamation phase.
3. Seed and mulch all disturbed areas as soon as possible after construction.
4. Use sumps or stone check dams at culvert entrances.
5. Use rip rap protection at culvert exits except in jurisdictional waters.
6. Use reinforced silt fence downslope of all disturbed areas.



West Virginia State Plane  
NAD '83  
North Zone  
12K OPS

William M. Compton  
T.M. 04-06-25

Charles & Cathy Piorey  
T.M. 04-06-27.1

Wayne E. & Sharon L. Jones  
T.M. 04-06-27.2

William M. Compton  
T.M. 04-06-28 & 29

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Justin Nutter &  
Christopher Nutter  
T.M. 04-06-06

William M. Compton  
T.M. 04-06-24

Clifford E. Hudkins  
T.M. 04-06-07

William M. Compton  
T.M. 04-06-23

*SPDW*  
*10/8/2020*

Jackson Surveying Inc.

J.S. Zinn #2

Page 1 of 2

**LEGEND**

- Property Line
- Gas Line
- Overhead Electrical Line
- Right of Way Centerline
- Ditch
- Fence

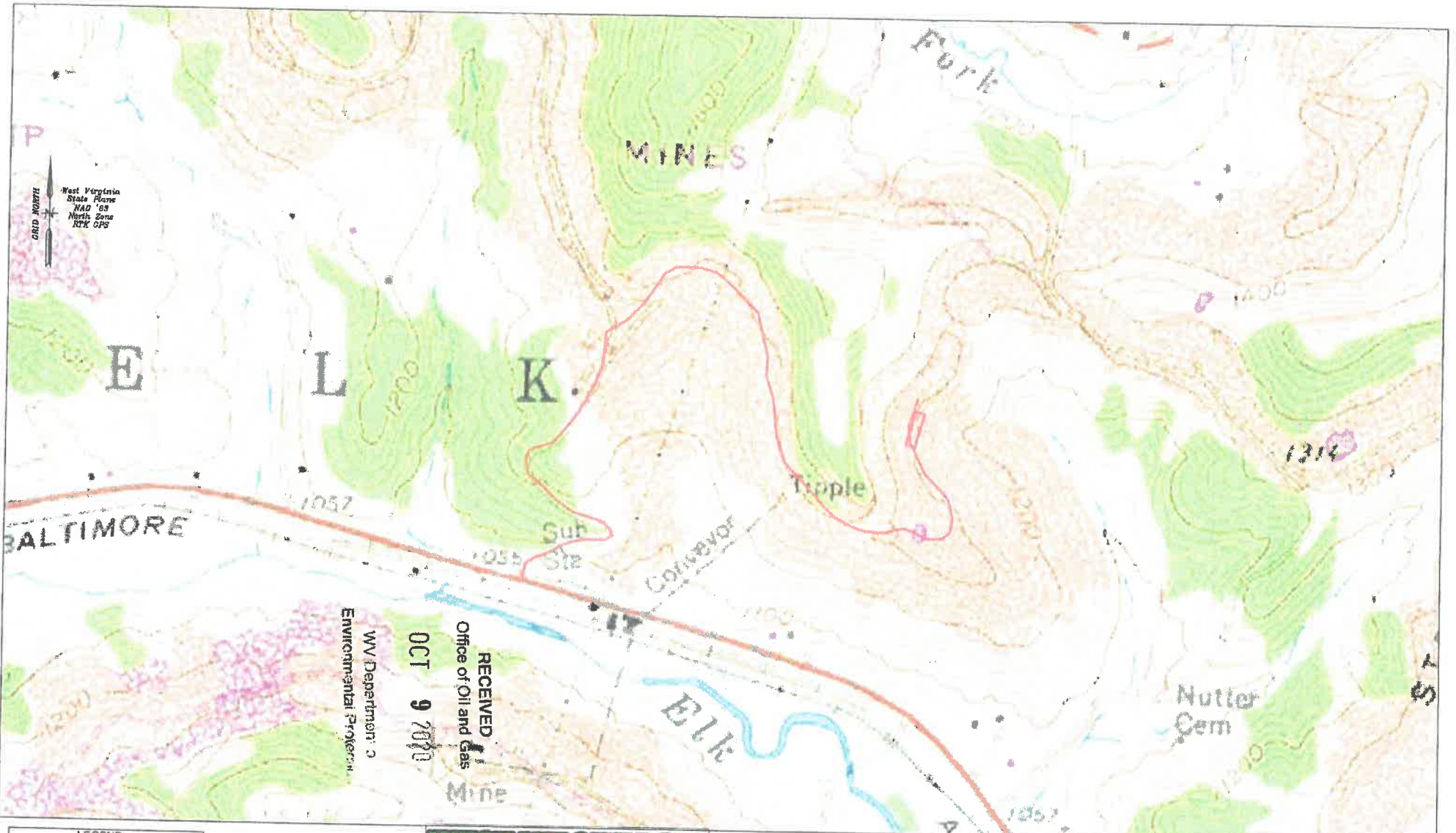
Pepper Development, LLC  
P.O. Box 569  
Clarksburg, WV 26302

**WEST VIRGINIA 811**  
CALL BEFORE YOU DIG!  
Dial 811 or 800.245.4848  
www.WV811.com





4700103363



OLD ROUTE  
 North Virginia  
 State Plane  
 NAD '83  
 North Zone  
 FTM EPS

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 Environmental Protection

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 OCT 9 2020

LEGEND	
---	Property Line
-C-	Gas Line
-E-	Overhead Electrical Line
-R-	Right of Way Contour
-D-	Ditch
-P-	Fence

**Pepper Development, LLC**  
 P.O. Box 569  
 Clarksburg, WV 26302

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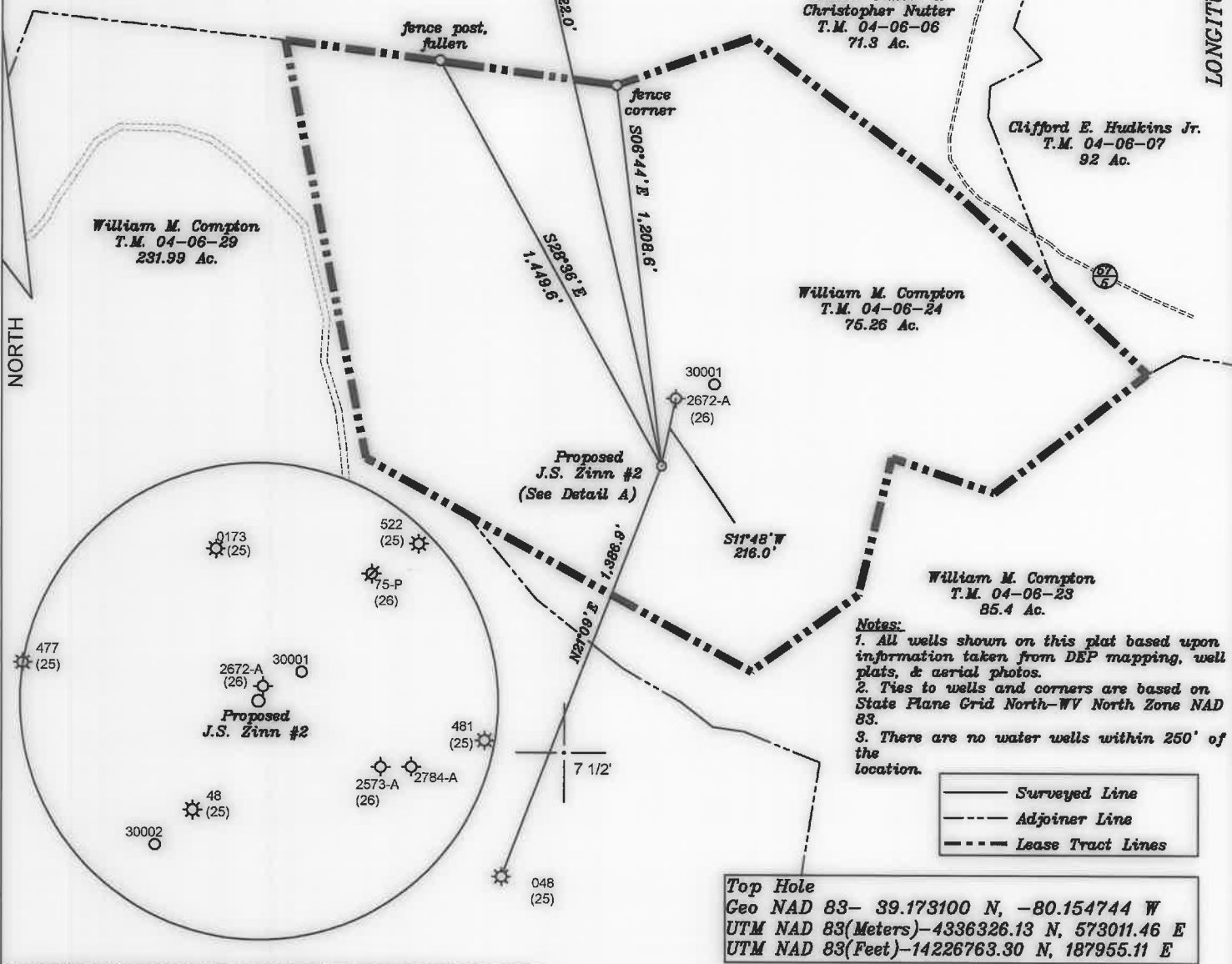
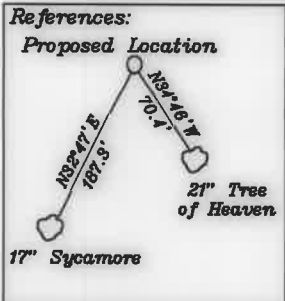
Jackson Surveying Inc.

J.S. Zinn #2

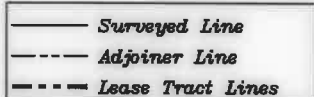
Page 2 of 2

SDW 10/8/2020





- Notes:**
1. All wells shown on this plat based upon information taken from DEP mapping, well plats, & aerial photos.
  2. Ties to wells and corners are based on State Plane Grid North-WV North Zone NAD 83.
  3. There are no water wells within 250' of the location.



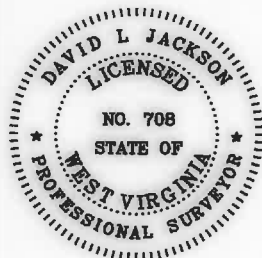
**Top Hole**  
 Geo NAD 83- 39.173100 N, -80.154744 W  
 UTM NAD 83(Meters)-4336326.13 N, 573011.46 E  
 UTM NAD 83(Feet)-14226763.30 N, 187955.11 E

(+) DENOTES LOCATION OF WELL ON UNITED STATES TOPOGRAPHIC MAPS

FILE NO. \_\_\_\_\_  
 DRAWING NO. 1  
 SCALE 1" = 500'  
 MINIMUM DEGREE OF ACCURACY 1 in 200  
 PROVEN SOURCE OF ELEVATION GPS  
submeter unit

I THE UNDERSIGNED, HEREBY CERTIFY THAT THIS PLAT IS CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF AND SHOWS ALL THE INFORMATION REQUIRED BY LAW AND THE RULES ISSUED AND PRESCRIBED BY THE DEPARTMENT OF ENVIRONMENTAL PROTECTION.

(SIGNED) David L Jackson  
 R.P.E. \_\_\_\_\_ P.S. 708



STATE OF WEST VIRGINIA  
 Division of Environmental Protection  
 OFFICE OF OIL AND GAS

DATE October 8 2020  
 OPERATOR'S WELL NO. J.S. Zinn #2  
 API WELL NO. \_\_\_\_\_

WELL TYPE: OIL \_\_\_ GAS X LIQUID INJECTION \_\_\_ WASTE DISPOSAL \_\_\_ STATE 47 COUNTY 001 PERMIT 03363  
 (IF "GAS") PRODUCTION \_\_\_ STORAGE \_\_\_ DEEP \_\_\_ SHALLOW X

LOCATION: ELEVATION 1,342.5' WATER SHED Elk Creek (HUC-10)  
 DISTRICT Elk COUNTY Barbour  
 QUADRANGLE Browton 7 1/2'

SURFACE OWNER William M. Compton ACREAGE 75.26 Ac.  
 OIL & GAS ROYALTY OWNER Mount Olive Cemetery LEASE ACREAGE 75.26 Ac.  
 LEASE NO. \_\_\_\_\_

PROPOSED WORK: DRILL X CONVERT \_\_\_ DRILL DEEPER \_\_\_ REDRILL \_\_\_ FRACTURE OR STIMULATE X PLUG OFF OLD FORMATION \_\_\_ PERFORATE NEW FORMATION \_\_\_ OTHER PHYSICAL CHANGE IN WELL (SPECIFY) \_\_\_\_\_

PLUG AND ABANDON \_\_\_ CLEAN OUT AND REPLUG \_\_\_  
 TARGET FORMATION Haverty ESTIMATED DEPTH 5,975'  
 WELL OPERATOR Pepper Development, LLC DESIGNATED AGENT Karl Swisher  
 ADDRESS P.O. Box. 569, Clarksburg, WV 26302 ADDRESS P.O. Box. 569, Clarksburg, WV 26302