



west virginia department of environmental protection

Office of Oil and Gas
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Harold D. Ward, Cabinet Secretary
www.dep.wv.gov

Wednesday, September 16, 2026
WELL WORK PLUGGING PERMIT
Vertical Plugging

WEST VIRGINIA LAND RESOURCES, INC.
46226 NATIONAL ROAD WEST

ST. CLAIRSVILLE, OH 43950

Re: Permit approval for 1-3696
47-061-00155-00-00

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.

Upon completion of the plugging well work, the above named operator will reclaim the site according to the provisions of WV Code 22-6-30. Please be advised that form WR-38, Affidavit of Plugging and Filling Well, 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.

H. Jason Harmon
Chief

Operator's Well Number: 1-3696
Farm Name: TENNANT, ELIZABETH J.
U.S. WELL NUMBER: 47-061-00155-00-00
Vertical Plugging
Date Issued: 9/16/2026

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

1. All pits must be lined with a minimum of 20 mil thickness synthetic liner.
2. 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.
3. Well work activities shall not constitute a hazard to the safety of persons.
4. A cement bond log must be run on the production casing to establish the top of cement and all free casing must be cut and pulled.

1) Date AUGUST 11 , 20 26
2) Operator's
Well No. MD-49
3) API Well No. 47-061-0055

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

APPLICATION FOR A PERMIT TO PLUG AND ABANDON

4) Well Type: Oil ____ / Gas X / Liquid injection ____ / Waste disposal ____ /
(If "Gas, Production ____ or Underground storage ____) Deep ____ / Shallow ____

5) Location: Elevation 1109.88' Watershed NORTH FORK OF WEST VIRGINIA FORK OF DUNKARD CREEK
District BATTELLE County MONONGALIA Quadrangle WADESTOWN W.VA, PA

6) Well Operator WEST VIRGINIA LAND RESOURCES INC. 7) Designated Agent DAVID RODDY
Address 537 WILLIAMS RD. Address 537 WILLIAMS RD.
MORGANTOWN, WV 26501 MORGANTOWN, WV 26501

8) Oil and Gas Inspector to be notified 9) Plugging Contractor
Name ROBERT HITT Name _____
Address P.O. BOX 112 Address _____
JANE LEW, WV 26378

10) Work Order: The work order for the manner of plugging this well is as follows:

See Exhibit No. 1 and MSHA 101-C Exemption

Marion County Mine (MSHA ID# 46-01433)

MSHA 101-C Docket No. M-2016-017-C

Approximate Surface Elevation = 1109.88'

Approximate Bottom of Coal = 187.88'

Approximate Depth = 922.00'

RECEIVED
Office of Oil and Gas

AUG 20 2026

WV Department of
Environmental Protection

Notification must be given to the district oil and gas inspector 24 hours before permitted work can commence.

Work order approved by inspector

Robert J. Hitt

Date 8-14-26

09/18/2026

In the matter of:
The Marion County Coal Company
Marion County Mine
I.D. No. 46-01433

Petition for modification

Docket No. M-2016-017-C

MSHA 101 C
EXEMPTION

DECISION AND ORDER

On May 31, 2016, a petition was filed seeking a modification of the application of 30 C.F.R. § 75.1700 to The Marion County Coal Company's Marion County Mine located in Marion County, West Virginia. The Petitioner filed the petition to permit an alternative method of compliance with the standard with respect to vertical to horizontal oil and gas wells into the underground coal seams. The petitioner request to amend their current Proposed Decision Order (PDO) grant by MSHA on June 4, 1991, under Docket M-1990-156-C formerly known as Consolidation Coal Company, Loveridge No. 22 Mine to the alternate method stipulated in the April 29, 2013 PDO granted to ACI Tygart Valley, Leer Mine.

The Petitioner alleges that the proposed alternative method will at all times guarantee no less than the same measure of protection afforded miners under 30 C.F.R. § 75.1700 as that provided by the standard, which states:

§ 75.1700 Oil and gas wells.

Each operator of a coal mine shall take reasonable measures to locate oil and gas wells penetrating coalbeds or any underground area of a coal mine. When located, such operator shall establish and maintain barriers around such oil and gas wells in accordance with State laws and regulations, except that such barriers shall not be less than 300 feet in diameter, unless the Secretary or his authorized representative permits a lesser barrier consistent with the applicable State laws and regulations where such lesser barrier will be adequate to protect against hazards from such wells to the miners in such mine, or unless the Secretary or his authorized representative requires a greater barrier where the depth of the mine, other geologic conditions, or other factors warrant such a greater barrier.

The Petition addresses items for which District Manager approval is required, procedures for cleaning out and preparing oil and gas wells prior to plugging or re-plugging, procedures for plugging or re-plugging oil or gas wells to the surface, procedures for plugging or re-plugging oil or gas wells for use as degasification boreholes, alternative procedures for preparing and plugging or re-plugging oil or gas wells, and procedures after approval has been granted to mine through a plugged or re-plugged well.

09/18/2026

Between July 20, 2016 and August 3, 2016, MSHA personnel conducted an investigation of the petition and filed a report of their findings with the Administrator for Coal Mine Safety and Health. The modification granted under Docket No. M-1990-156-C will be superseded and replaced by this amended modification granted under Docket No. M-2016-017-C after this Proposed Amended Decision and Order becomes final.

The mine is represented by United Mine Workers of America (UMWA), AFL-CIO, CLC-1638 with miners' representatives and did not file any questions or comments on behalf of the miners.

After review of the parties' submissions and Joint Motion for Settlement, the following Decision and Order is issued.

FINDINGS OF FACT AND CONCLUSIONS OF LAW

The Marion County Mine employs approximately 712 miners and produces approximately 50,000 tons of bituminous coal per day from the Pittsburgh #8 coal seam with an average mine height of 66 inches. At this time, there are no coal seams being mined below (i.e., stratigraphically down section from) the Pittsburgh seam. The mine is accessed through 2 slope and 12 air shafts. The mine operates 3 production shifts per day, 5 days per week, on five working sections, two longwall and three advancing gate sections utilizing continuous mining machines. The mine liberates 11,659,131 cubic feet of methane on a daily basis.

Although MSHA has granted modifications of this standard at different mines over the years, changing circumstances in oil and gas drilling technology and practices compels MSHA to reconsider the safest approach to mining around or through such wells. In recent years, changes in hydraulic fracturing (fracking) technology, marketplace and resource conditions have led to an increase in the number and depth of oil and gas wells penetrating the Pittsburgh #8 and other coal seams. Since deeper wells are usually associated with higher well pressures, modifications of § 75.1700 must include appropriate measures to better protect miners. In addition to the risks associated with higher well pressures, MSHA is concerned that operators may be preparing and plugging wells to inadequate depths for convenience or to lower costs, which may result in reduced safety for miners.

This Decision and Order reflects the settlement between the Petitioner's proposal and the amended terms and conditions first set forth by MSHA, under the terms set forth below. The major points of compromise include the following:

1. *Making a diligent effort to remove the casing to the original total depth.* If all of the casing can be removed, or if the well contains no casing, the operator shall

prepare the well for plugging, and use seals described below, for wells less than 4,000' depth to seal to 200 feet below the coal seam to be mined, or the lowest mineable seam, whichever is lower, or for wells 4,000' deep or greater, seal 400 feet below the coal seam to be mined, or lowest mineable seam, whichever is lower. MSHA retains the right to review and direct the operator's sealing protocol, in the event geologic or well conditions require further measures. As used in this Proposed Amended Decision and Order, in order to make a diligent effort to remove the casing, the operator shall pull a minimum of 150% of casing string weight and/or have made at least three attempts to spear or overshot to grip the casing for the required minimum pull effort. Where casing string length is unknown, a 3,000' casing string will be assumed. The operator shall keep a record of these efforts, including casing length and weights, and make available for MSHA review. The District Manager reserves the right to require additional measures in efforts to remove casing, as appropriate.

2. *Unknown total depth.* If the total depth of the well is unknown the operator must contact the District Manager before proceeding. MSHA believes, by including this step in the process, that miner safety will be better served because the Petitioner and the District Manager can work together to evaluate the conditions of the well to be plugged as well as the safest way to accomplish the plugging. MSHA and the operator will work cooperatively to establish a communications protocol, so that the operator may contact the District Manager while working outside normal working hours.
3. *Cement.* Cement is specified to be used as a plugging material, instead of an unnamed "approved equivalent," as requested by Petitioner.
4. *Wells vary in depth.* The terms and conditions required by MSHA will require operator to prepare these wells for safe intersection by making a diligent effort to remove casing to the total depth if possible, then: cleaning to and setting a plug at least 200' below the coal seam to be mined or lowest mineable seam, whichever is lower; or for wells 4,000' or greater, to at least 400 feet below the coal seam to be mined, or lowest mineable seam, whichever is lower. The operator will then plug from either the attainable bottom or the newly installed plug, as applicable, by pumping expanding cement slurry and pressurizing to at least 200 psi. If the total depth is not reached and casing cannot be removed, these alternative methods included in this proposed decision and order have proven to be safe and effective when properly implemented.
5. *Notification* – Where the operator is required to notify the District Manager pursuant to the terms of this Proposed Decision and Order, the method of notification will be set forth in the cut-through procedures for each well. The

District Manager agrees to provide a number wherein he or his designee is available at all times.

Therefore, the terms and conditions as amended will at all times guarantee no less than the same measure of protection afforded the miners under 30 C.F.R.

§ 75.1700 for all wells regardless of depth. On the basis of the Petition, comments received, the findings of MSHA's investigation, and the Joint Motion for Settlement by the parties, the Marion County Coal Company is granted a modification of the application of 30 C.F.R. § 75.1700 to its Marion County Mine.

ORDER

Under the authority delegated by the Secretary of Labor to the Administrator for Coal Mine Safety and Health, and under § 101(c) of the Federal Mine Safety and Health Act of 1977, 30 U.S.C. § 811(c), and 30 C.F.R. Part 44, a modification of the application of 30 C.F.R. § 75.1700 at The Marion County Coal Company's Marion County Mine is hereby:

GRANTED, subject to the following terms and conditions:

1. DISTRICT MANAGER APPROVAL REQUIRED

- a. The type of oil or gas well that will be considered under this Petition includes wells that have been depleted of oil or gas production or have not produced oil or gas and may have been plugged, or active conventional vertical wells which are not producing gas or oil, subject to the provisions below. Unconventional wells in the Marcellus, Utica, and all other unconventional shale oil and gas wells are not subject to this modification. Nothing in these provisions is meant to lessen, diminish, or substitute any provision found in applicable state laws or regulations.
- b. A safety barrier of 300 feet in diameter (150 feet between any mined area and a well) shall be maintained around all oil and gas wells (defined herein to include all active, inactive, abandoned, shut-in, previously plugged wells, water injection wells, and carbon dioxide sequestration wells) until approval to proceed with mining has been obtained from the District Manager. Wells that were drilled into potential oil or gas producing formations that did not produce commercial quantities of either gas or oil (exploratory wells, wildcat wells or dry holes) are classified as oil or gas wells by MSHA.
- c. Prior to mining within the safety barrier around any well that the mine plans to intersect, the mine operator shall provide to the District Manager a sworn affidavit or declaration executed by a company official, the person at the mine

who is in charge of health and safety at the mine, stating that all mandatory procedures for cleaning out, preparing, and plugging each gas or oil well have been completed as described by the terms and conditions of this order.

The affidavit or declaration must be accompanied by all logs, electronic or otherwise, described in subparagraphs 2(a)(2) and 2(a)(3) below and any other records described in those subparagraphs which the District Manager may request. The District Manager will review the affidavit or declaration, the logs and any other records that have been requested, and may inspect the well itself, and will then determine if the operator has complied with the procedures for cleaning out, preparing, and plugging each well as described by the terms and conditions of this Order. If the District Manager determines that the procedures have been complied with, he will provide his approval, and the mine operator may then mine within the safety barrier of the well, subject to the terms of this Order.

If well intersection is not planned, the mine operator may request a permit to reduce the 300 foot diameter of the safety barrier that does not include intersection of the well. The District Manager may require documents and information that help verify the accuracy of the location of the well in respect to the mine maps and mining projections. This information may include survey closure data, down-hole well deviation logs, historical well intersection location data and any additional data required by the District Manager. If the District Manager determines that the proposed barrier reduction is reasonable, he will provide his approval, and the mine operator may then mine within the safety barrier of the well.

d. The terms and conditions of this Order apply to all types of underground coal mining.

2. **MANDATORY PROCEDURES FOR CLEANING OUT, PREPARING, PLUGGING, AND RE-PLUGGING OIL OR GAS WELLS**

a. **MANDATORY PROCEDURES FOR CLEANING OUT AND PREPARING VERTICAL OIL AND GAS WELLS PRIOR TO PLUGGING OR RE-PLUGGING**

The mine operator shall test for gas emissions inside the hole before cleaning out, preparing, plugging, and re-plugging oil and gas wells. The District Manager shall be contacted if the well is actively producing gas.

(1) A diligent effort shall be made to remove all the casing in the well and clean the well to 200' below the coal seam to be mined, or the lowest

mineable coal seam, whichever is lower, or for wells 4,000' or greater, clean the well to 400' below the coal seam to be mined, or the lowest mineable coal seam, whichever is lower.

If the total depth of the well is less than 4,000 feet, the operator shall completely clean out the well from the surface to at least 200 feet below the coal seam to be mined, unless the District Manager requires cleaning to a greater depth based on his judgment as to what is required due to the geological strata, or due to the pressure within the well. The operator shall provide the District Manager with all information it possesses concerning the geological nature of the strata and the pressure of the well. If the total depth of the well is 4,000 feet, or greater, the operator shall completely clean out the well from the surface to at least 400 feet below the coal seam to be mined. Wells of this greater depth are under greater pressure, so the 400 feet requirement provides greater protection for miners. The operator shall make a diligent effort to remove all material from the entire diameter of the well, wall to wall. If the total depth of the well is unknown and there is no historical information, the mine operator must contact the District Manager before proceeding.

Where active wells which are no longer producing are being cleaned and prepared subject to this order, the operator must: 1) attempt to remove all of the casing using a diligent effort, and comply with all other applicable provisions in this order, or 2) if the casing cannot be removed from the total depth, must be filled with cement from the lowest possible depth to 200 feet below the seam to be mined or lowest mineable coal seam, whichever is lower for wells less than 4,000', or 400 feet below the seam to be mined or lowest mineable coal seam, whichever is lower, for wells 4,000' or greater, and the other applicable provisions in this order still apply, or 3) if the casing cannot be removed it shall be perforated from 200 feet below the coal seam to be mined, or lowest mineable seam, whichever is lower, or 400 feet below the seam to be mined or lowest mineable coal seam, whichever is lower, for wells 4,000' or greater, and the annuli shall be cemented or otherwise filled, and the other applicable provisions in this order still apply.

- (2) The operator shall prepare down-hole logs for each well. Logs shall consist of a caliper survey, a bond log if appropriate, a deviation survey, and a gamma survey for determining the top, bottom, and thickness of all coal seams down to the coal seam to be mined, or the lowest mineable coal seam, whichever is lower, potential hydrocarbon producing strata and the location of any existing bridge plug. In addition, a journal shall be maintained describing the depth of each material encountered; the nature

of each material encountered; bit size and type used to drill each portion of the hole; length and type of each material used to plug the well; length of casing(s) removed, perforated or ripped or left in place; any sections where casing was cut or milled; and other pertinent information concerning cleaning and sealing the well. Invoices, work-orders, and other records relating to all work on the well shall be maintained as part of this journal and provided to MSHA upon request.

- (3) When cleaning out the well as provided for in subparagraph (a)(1), the operator shall make a diligent effort to remove all of the casing in the well. Thereafter, the well should be plugged to the attainable bottom, at least 200 feet below the coal seam to be mined or lowest mineable seam, whichever is lower, by pumping expanding cement slurry and pressurizing to at least 200 psi. If the casing cannot be removed, it must be cut, milled, perforated or ripped at sufficient intervals to facilitate the removal of any remaining casing in the coal seam by the mining equipment. Any casing which remains shall be perforated or ripped to permit the injection of cement into voids within and around the well. All casing remaining at the coal seam to be mined shall be perforated or ripped at least every 5 feet from 10 feet below the coal seam to 10 feet above the coal seam.

Perforations or rips are required at least every 50 feet from 200 feet (400 feet if the total well depth is 4,000 feet or greater) below the base of the lowest mineable coal seam up to 100 feet above the uppermost mineable coal seam. For perforations in the Pittsburgh Seam, see Appendix A. The mine operator must take appropriate steps to ensure that the annulus between the casing and the well walls are filled with expanding (minimum 0.5% expansion upon setting) cement and contain no voids.

Jet/sand cutting is one method for ripping or perforating casing with three or more strings of casing in the Pittsburgh coal seam in preparation for mining. This method uses compressed nitrogen gas and sand to cut the well casings as outlined in Appendix A. On active wells cuts start at 200' above the bottom of the casing at 200' intervals, to 200' below the bottom of the Pittsburgh coal seam where Appendix A outlines cut interval minimums.

If it is not possible to remove all of the casing, the operator shall notify the District Manager before any other work is performed. **If the well cannot be cleaned out or the casing removed, the operator shall prepare the well as described from the surface to at least 200 feet below the base of the lowest mineable coal seam for wells less than 4000 feet in depth and**

400 feet below the lowest mineable coal seam for wells 4000 feet or greater, unless the District Manager requires cleaning out and removal of casing to a greater depth based on his judgement as to what is required due to geological strata, or due to the pressure within the well.

If the operator, using a casing bond log, can demonstrate to the satisfaction of the District Manager that all annuli in the well are already adequately sealed with cement, then the operator will not be required to perforate or rip the casing for that particular well. When multiple casing and tubing strings are present in the coal horizon(s), any casing which remains shall be ripped or perforated and filled with expanding cement as indicated above. An acceptable casing bond log for each casing and tubing string is needed if used in lieu of ripping or perforating multiple strings.

- (4) If the District Manager concludes that the completely cleaned-out well is emitting excessive amounts of gas, the operator must place a mechanical bridge plug in the well.

It must be placed in a competent stratum at least 200 feet (400 feet if the total well depth is 4,000 feet or greater) below the base of the lowest mineable coal seam, but above the top of the uppermost hydrocarbon-producing stratum, unless the District Manager requires a greater distance based on his judgment that it is required due to the geological strata, or due to the pressure within the well. The operator shall provide the District Manager with all information it possesses concerning the geological nature of the strata and the pressure of the well. If it is not possible to set a mechanical bridge plug, an appropriately sized packer may be used. The mine operator shall document what has been done to "kill the well" and plug the hydrocarbon producing strata.

- (5) If the upper-most hydrocarbon-producing stratum is within 300 feet of the base of the coal seam to be mined, or lowest mineable seam, whichever is lower, the operator shall properly place mechanical bridge plugs as described in subparagraph (a)(4) to isolate the hydrocarbon-producing stratum from the expanding cement plug.

Nevertheless, the operator shall place a minimum of 200 feet (400 feet if the total well depth is 4,000 feet or greater) of expanding cement below the coal seam to be mined, or lowest mineable seam, whichever is lower, unless the District Manager requires a greater distance based on his judgment that it is required due to the geological strata, or due to the pressure within the well.

b. MANDATORY PROCEDURES FOR PLUGGING OR RE-PLUGGING OIL OR GAS WELLS TO THE SURFACE

After completely cleaning out the well as specified in paragraph 2(a) above, the following procedures shall be used to plug or re-plug wells:

- (1) **The operator shall pump expanding cement slurry down the well to form a plug which runs from at least 200 feet (400 feet if the total well depth is 4,000 feet or greater) below the base of the coal seam to be mined, or lowest mineable seam, whichever is lower, (or lower if required by the District Manager based on his judgment that a lower depth is required due to the geological strata, or due to the pressure within the well) to the surface.** The expanding cement will be placed in the well under a pressure of at least 200 pounds per square inch. Portland cement or a lightweight cement mixture may be used to fill the area from 100 feet above the top of the uppermost mineable coal seam (or higher if required by the District Manager based on his judgment that a higher distance is required due to the geological strata, or due to the pressure within the well) to the surface.
- (2) The operator shall embed steel turnings or other small magnetic particles in the top of the cement near the surface to serve as a permanent magnetic monument of the well. In the alternative, a 4-inch or larger diameter casing, set in cement, shall extend at least 36 inches above the ground level with the API well number engraved or welded on the casing. When the hole cannot be marked with a physical monument (e.g. prime farmland), high-resolution GPS coordinates (one-half meter resolution) are required.

c. MANDATORY PROCEDURES FOR PLUGGING OR RE-PLUGGING OIL AND GAS WELLS FOR USE AS DEGASIFICATION WELLS

After completely cleaning out the well as specified in paragraph 2(a) above, the following procedures shall be utilized when plugging or re-plugging wells that are to be used as degasification wells:

- (1) **The operator shall set a cement plug in the well by pumping an expanding cement slurry down the tubing to provide at least 200 feet (400 feet if the total well depth is 4,000 feet or greater) of expanding cement below the coal seam to be mined, or lowest mineable seam, whichever is lower, unless the District Manager requires a greater depth based on his judgment that a greater depth is required due to the geological strata, or due to the pressure within the well.** The expanding cement will be placed in the well under a pressure of at least 200 pounds

per square inch. The top of the expanding cement shall extend at least 50 feet above the top of the coal seam being mined, unless the District Manager requires a greater distance based on his judgment that a greater distance is required due to the geological strata, or due to the pressure within the well.

- (2) The operator shall securely grout into the bedrock of the upper portion of the degasification well a suitable casing in order to protect it. The remainder of this well may be cased or uncased.
- (3) The operator shall fit the top of the degasification casing with a wellhead equipped as required by the District Manager in the approved ventilation plan. Such equipment may include check valves, shut-in valves, sampling ports, flame arrestor equipment, and security fencing.
- (4) Operation of the degasification well shall be addressed in the approved ventilation plan. This may include periodic tests of methane levels and limits on the minimum methane concentrations that may be extracted.
- (5) After the area of the coal mine that is degassed by a well is sealed or the coal mine is abandoned, the operator must plug all degasification wells using the following procedures:
 - (i) The operator shall insert a tube to the bottom of the well or, if not possible, to within 100 feet above the coal seam being mined. Any blockage must be removed to ensure that the tube can be inserted to this depth.
 - (ii) The operator shall set a cement plug in the well by pumping Portland cement or a lightweight cement mixture down the tubing until the well is filled to the surface.
 - (iii) The operator shall embed steel turnings or other small magnetic particles in the top of the cement near the surface to serve as a permanent magnetic monument of the well. In the alternative, a 4-inch or larger casing, set in cement, shall extend at least 36 inches above the ground level with the API well number engraved or welded on the casing.
 - (iv) This provision does not apply to traditional degasification holes which have not intersected the seam to be mined, have not commercially produced gas and have no API number.

d. MANDATORY ALTERNATIVE PROCEDURES FOR PREPARING AND PLUGGING OR RE-PLUGGING OIL OR GAS WELLS

The following provisions apply to all wells which the operator determines, and with which the MSHA District Manager agrees, cannot be completely cleaned out due to damage to the well caused by subsidence, caving, or other factors.

- (1) **The operator shall drill a hole adjacent and parallel to the well, to a depth of at least 200 feet (400 feet if the total well depth is 4,000 feet or greater) below the coal seam to be mined, or lowest mineable seam, whichever is lower, unless the District Manager requires a greater depth based on his judgment that a greater depth is required due to the geological strata, or due to the pressure within the well.**
- (2) The operator shall use a geophysical sensing device to locate any casing which may remain in the well.
- (3) If the well contains casing(s), the operator shall drill into the well from the parallel hole. From 10 feet below the coal seam to 10 feet above the coal seam, the operator shall perforate or rip all casings at least every 5 feet. **Beyond this distance, the operator shall perforate or rip at least every 50 feet from at least 200 feet (400 feet if the total well depth is 4,000 feet or greater) below the base of the coal seam to be mined, or lowest mineable seam, whichever is lower, up to 100 feet above the seam being mined, unless the District Manager requires a greater distance based on his judgment that a greater distance is required due to the geological strata, or due to the pressure within the well. The diagram shown in Appendix A is representative of the locations of the perforations or ripping that must be done.**

The operator shall fill the annulus between the casings and between the casings and the well wall with expanding (minimum 0.5% expansion upon setting) cement, and shall ensure that these areas contain no voids. If the operator, using a casing bond log, can demonstrate to the satisfaction of the District Manager that the annulus of the well is adequately sealed with cement, then the operator will not be required to perforate or rip the casing for that particular well, or fill these areas with cement. When multiple casing and tubing strings are present in the coal horizon(s), any casing which remains shall be ripped or perforated and filled with expanding cement as indicated above. An acceptable casing bond log for each casing and tubing string is needed if used in lieu of

ripping or perforating multiple strings.

- (4) Where the operator determines, and the District Manager agrees, that there is insufficient casing in the well to allow the method outlined in subparagraph (d)(3) to be used, then the operator shall use a horizontal hydraulic fracturing technique to intercept the original well. **From at least 200 feet (400 feet if the total well depth is 4,000 feet or greater) below the base of the coal seam to be mined, or lowest mineable seam, whichever is lower, to a point at least 50 feet above the seam being mined, the operator shall fracture in at least six places at intervals to be agreed upon by the operator and the District Manager after considering the geological strata and the pressure within the well.** The operator shall then pump expanding cement into the fractured well in sufficient quantities and in a manner which fills all intercepted voids.
- (5) The operator shall prepare down-hole logs for each well. Logs shall consist of a caliper survey, a bond log if applicable, a deviation survey, and a gamma log for determining the top, bottom, and thickness of all coal seams down to the coal seam to be mined, **or lowest mineable seam, whichever is lower,** potential hydrocarbon producing strata and the location of any existing bridge plug. The operator may obtain the logs from the adjacent hole rather than the well if the condition of the well makes it impractical to insert the equipment necessary to obtain the log.
- (6) A journal shall be maintained describing the depth of each material encountered; the nature of each material encountered; bit size and type used to drill each portion of the hole; length and type of each material used to plug the well; length of casing(s) removed, perforated or ripped or left in place; any sections where casing was cut or milled; and other pertinent information concerning sealing the well. Invoices, work-orders, and other records relating to all work on the well shall be maintained as part of this journal and provided to MSHA upon request.
- (7) After the operator has plugged the well as described in subparagraphs (d)(3) and/or (d)(4), the operator shall plug the adjacent hole, from the bottom to the surface, with Portland cement or a lightweight cement mixture.

The operator shall embed steel turnings or other small magnetic particles in the top of the cement near the surface to serve as a permanent magnetic monument of the well. In the alternative, a 4-inch or larger casing, set in cement, shall extend at least 36 inches above the ground level.

A combination of the methods outlined in subparagraphs (d)(3) and (d)(4) may have to be used in a single well, depending upon the conditions of the hole and the presence of casings. The operator and the District Manager shall discuss the nature of each hole. The District Manager may require that more than one method be utilized. The mine operator may submit an alternative plan to the District Manager for approval to use different methods to address wells that cannot be completely cleaned out. The District Manager may require additional documentation and certification by a registered petroleum engineer to support the proposed alternative methods.

3. MANDATORY PROCEDURES WHEN MINING WITHIN A 100-FOOT DIAMETER BARRIER AROUND WELL

- a. A representative of the operator, a representative of the miners, the appropriate State agency, or the MSHA District Manager may request that a conference be conducted prior to intersecting any plugged or re-plugged well. Upon receipt of any such request, the District Manager shall schedule such a conference. The party requesting the conference shall notify all other parties listed above within a reasonable time prior to the conference to provide opportunity for participation. The purpose of the conference shall be to review, evaluate, and accommodate any abnormal or unusual circumstance related to the condition of the well or surrounding strata when such conditions are encountered.
- b. The operator shall intersect a well on a shift approved by the District Manager. The operator shall notify the District Manager and the miners' representative in sufficient time prior to intersecting a well in order to provide an opportunity to have representatives present.
- c. When using continuous mining methods, the operator shall install drilage sights at the last open crosscut near the place to be mined to ensure intersection of the well. The drilage sites shall not be more than 50 feet from the well. When using longwall-mining methods, distance markers shall be installed on 5-foot centers for a distance of 50 feet in advance of the well in the headgate entry and in the tailgate entry.
- d. The operator shall ensure that fire-fighting equipment including fire extinguishers, rock dust, and sufficient fire hose to reach the working face area of the well intersection (when either the conventional or continuous mining method is used) is available and operable during all well intersections. The fire hose shall be located in the last open crosscut of the entry or room. The operator shall maintain the water line to the belt

conveyor tailpiece along with a sufficient amount of fire hose to reach the farthest point of penetration on the section. When the longwall mining method is used, a hose to the longwall water supply is sufficient.

- e. The operator shall ensure that sufficient supplies of roof support and ventilation materials shall be available and located at the last open crosscut. In addition, emergency plugs and suitable sealing materials shall be available in the immediate area of the well intersection.
- f. On the shift prior to intersecting the well, the operator shall service all equipment and check it for permissibility. Water sprays, water pressures, and water flow rates used for dust and spark suppression shall be examined and any deficiencies corrected.
- g. The operator shall calibrate the methane monitor(s) on the longwall, continuous mining machine, or cutting machine and loading machine on the shift prior to intersecting the well.
- h. When mining is in progress, the operator shall perform tests for methane with a handheld methane detector at least every 10 minutes from the time that mining with the continuous mining machine or longwall face is within 30 feet of the well until the well is intersected. During the actual cutting process, no individual shall be allowed on the return side until the well intersection has been completed, and the area has been examined and declared safe. All workplace examinations on the return side of the shearer will be conducted while the shearer is idle. The operator's most current Approved Ventilation Plan will be followed at all times unless the District Manager deems a greater air velocity for the intersect is necessary.
- i. When using continuous or conventional mining methods, the working place shall be free from accumulations of coal dust and coal spillages, and rock dust shall be placed on the roof, rib, and floor to within 20 feet of the face when intersecting the well. On longwall sections, rock dusting shall be conducted and placed on the roof, rib, and floor up to both the headgate and tailgate gob.
- j. When the well is intersected, the operator shall de-energize all equipment, and thoroughly examine and determine the area to be safe before permitting mining to resume.
- k. After a well has been intersected and the working place determined to be safe, mining shall continue in by the well a sufficient distance to permit adequate ventilation around the area of the well.

- l. If the casing is cut or milled at the coal seam level, the use of torches should not be necessary. However, in rare instances, torches may be used for inadequately or inaccurately cut or milled casings. No open flame shall be permitted in the area until adequate ventilation has been established around the well bore and methane levels of less than 1.0% are present in all areas that will be exposed to flames and sparks from the torch. The operator shall apply a thick layer of rock dust to the roof, face, floor, ribs and any exposed coal within 20 feet of the casing prior to the use of torches.
- m. Non-sparking (brass) tools will be available and will be used exclusively to expose and examine cased wells.
- n. No person shall be permitted in the area of the well intersection except those actually engaged in the operation, including company personnel, representatives of the miners, personnel from MSHA, and personnel from the appropriate State agency.
- o. The operator shall alert all personnel in the mine to the planned intersection of the well prior to their going underground if the planned intersection is to occur during their shift. This warning shall be repeated for all shifts until the well has been mined through.
- p. The well intersection shall be under the direct supervision of a certified individual. Instructions concerning the well intersection shall be issued only by the certified individual in charge.
- q. If the mine operator cannot find the well in the longwall panel or if a development section misses the anticipated intersection, the operator shall cease mining to examine for hazardous conditions at the projected location of the well, notify the District Manager, and take reasonable measures to locate the well, including visual observation/inspection or through survey data. Mining may resume if the well is located and no hazardous conditions exist. If the well cannot be located, the mine operator shall work with District Manager to resolve any issues before mining resumes.
- r. The provisions of this Order do not impair the authority of representatives of MSHA to interrupt or halt the well intersection, and to issue a withdrawal order, when they deem it necessary for the safety of the miners. MSHA may order an interruption or cessation of the well

intersection and/or a withdrawal of personnel by issuing either a verbal or written order to that effect to a representative of the operator, which order shall include the basis for the order. Operations in the affected area of the mine may not resume until a representative of MSHA permits resumption. The mine operator and miners shall comply with verbal or written MSHA orders immediately. All verbal orders shall be committed to writing within a reasonable time as conditions permit.

- s. A copy of this Order shall be maintained at the mine and be available to the miners.
- t. If the well is not plugged to the total depth of all minable coal seams identified in the core hole logs, any coal seams beneath the lowest plug will remain subject to the barrier requirements of 30 C.F.R. § 75.1700, should those coal seams be developed in the future.
- u. All necessary safety precautions and safe practices according to Industry Standards, required by MSHA regulations and State regulatory agencies having jurisdiction over the plugging site will be followed to provide the upmost protection to the miners involved in the process.
- v. All miners involved in the plugging or re-plugging operations will be trained on the contents of this Petition prior to starting the process and a copy of this Petition will be posted at the well site until the plugging or re-plugging has been completed.
- w. Mechanical bridge plugs should incorporate the best available technologies that are either required or recognized by the State regulatory agency and/or oil and gas industry.
- x. Within 30 days after this Order becomes final, the operator shall submit proposed revisions for its approved 30 C.F.R. Part 48 training plan to the District Manager. These proposed revisions shall include initial and refresher training on compliance with the terms and conditions stated in the Order. The operator shall provide all miners involved in well intersection with training on the requirements of this Order prior to mining within 150 feet of the next well intended to be mined through.
- y. The responsible person required under 30 C.F.R. § 75.1501 Emergency Evacuations, is responsible for well intersection emergencies. The well intersection procedures should be reviewed by the responsible person prior to any planned intersection.

- z. Within 30 days after this Order becomes final, the operator shall submit proposed revisions for its approved mine emergency evacuation and firefighting program of instruction required under 30 C.F.R § 75.1502. The operator will revise the program of instruction to include the hazards and evacuation procedures to be used for well intersections. All underground miners will be trained in this revised plan within 30 days of submittal.

SUBJECT TO THE ABOVE TERMS AND CONDITIONS, and under the authority delegated by the Secretary of Labor to the Administrator for Coal Mine Safety and Health, and under § 101(c) of the Federal Mine Safety and Health Act of 1977, 30 U.S.C. § 811(c), and 30 C.F.R. Part 44, a modification of the application of 30 C.F.R. § 75.1700 at The Marion County Coal Company's Marion County Mine is hereby **GRANTED**.

DISTRIBUTION:

*Winfield Wilson
Office of the Solicitor, U.S. Dept. of Labor
201 12th St S, Suite 401
Arlington, VA 22202*

*Christopher D. Pence
Hardy Pence PLLC
500 Lee Street East, Suite 701
Charleston, WV 25301*

*Stephen Gigliotti
Coal Mine Safety & Health, Safety Division
Mine Safety and Health Administration, U.S. Dept. of Labor
201 12th St S, Suite 401
Arlington, VA 22202*

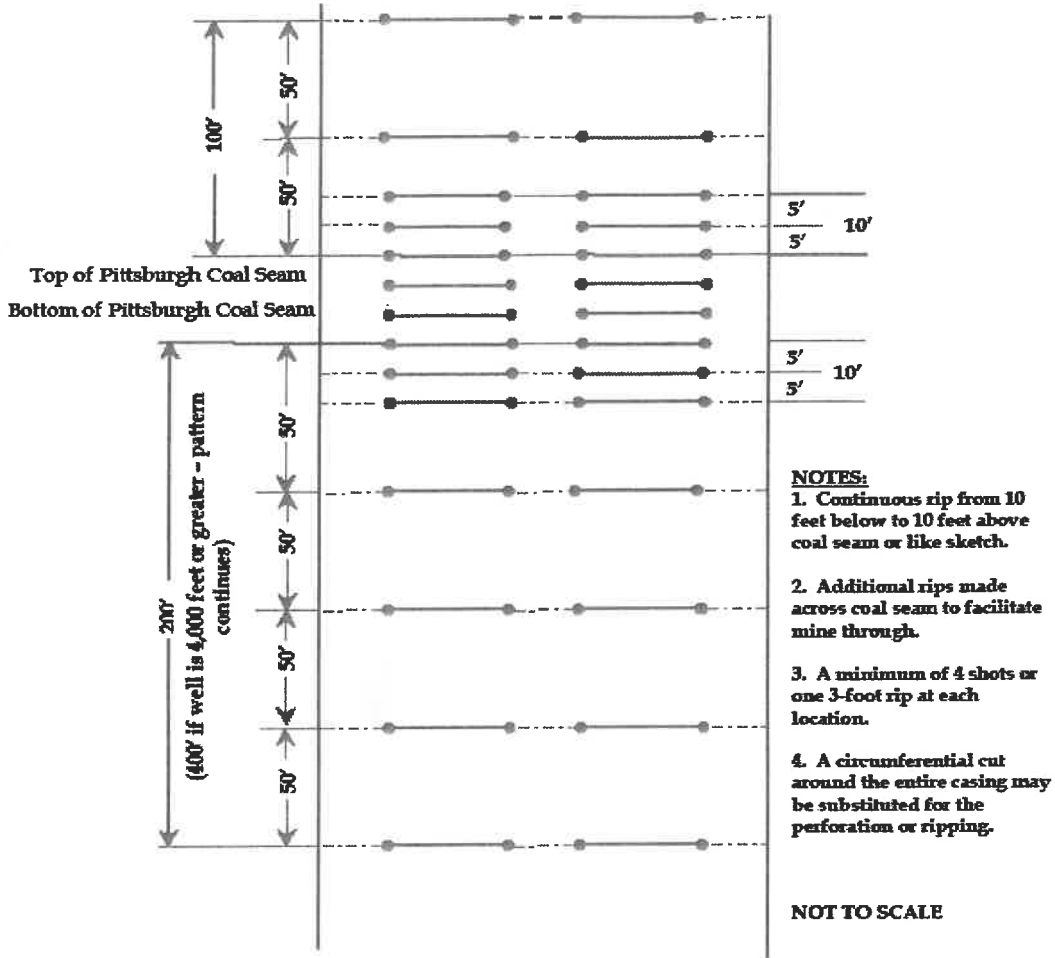
*Sheila McConnell
Office of Standards Regulations and Variances
Mine Safety and Health Administration, U.S. Dept. of Labor
201 12th St S, Suite 401
Arlington, VA 22202*

*David Roddy
Marion County Coal Company
1 Bridge Street
Monongah, WV 26554*

*Greg J. Norman, Director
West Virginia Office of Miners' Health Safety & Training
#7 Players Club Dr. Suite 2
Charleston WV 25311*

*Ricky L. Rinehart
UMWA Representative, Marion County Coal Mine
67 Cellular Drive
Mannington, West Virginia 26582*

Appendix A



SOLID PLUG METHOD

- ## Appendix A



09/18/2026

STATE OF WEST VIRGINIA
DEPARTMENT OF MINES
OIL AND GAS DIVISION

AFFIDAVIT OF PLUGGING AND FILLING WELL

AFFIDAVIT SHOULD BE MADE IN TRIPLICATE, ONE COPY MAILED TO THE DEPARTMENT, ONE COPY TO BE RETAINED BY THE WELL OPERATOR AND THE THIRD COPY (AND EXTRA COPIES IF REQUIRED) SHOULD BE MAILED TO EACH COAL OPERATOR AT THEIR RESPECTIVE ADDRESSES.

Wheeling Dollar Savings & Trust Co. D. K. Moore
COAL OPERATOR OR OWNER NAME OF WELL OPERATOR
c/o B.G. Sampson Fairmont West Virginia Route 2 Fairview, West Virginia
ADDRESS COMPLETE ADDRESS
Wheeling Dollar Savings & Trust Co. February 20, 1967 19
COAL OPERATOR OR OWNER WELL AND LOCATION
c/o B.G. Sampson Fairmont, West Virginia Pittelle District
ADDRESS
Elizabeth J. Tennant Monongalia County
LEASE OR PROPERTY OWNER
Wadestown, West Virginia
ADDRESS
Well No. 3596
Elizabeth J. Tennant Farm

STATE INSPECTOR SUPERVISING PLUGGING Bryan Shumaker

AFFIDAVIT

STATE OF WEST VIRGINIA.

County of Monongalia

SS:

Alan W. Hamilton and Jennie W. Tennant
being first duly sworn according to law depose and say that they are experienced in the work of
plugging and filling oil and gas wells and were employed by D. K. Moore
well operator, and participated in the work of plugging and filling the above well, that said work
was commenced on the 23 day of January, 1967, and that the well was plugged
and filled in the following manner:

SAND OR ZONE RECORD	FILLING MATERIAL	PLUGS USED	CASING
FORMATION		SIZE & KIND	CSG PULLED CSG LEFT IN
Cut 4 1/2" pipe at 2707	10'	Bridge 1725 to 1715	
Bridge 16' 2797 to 2781	15'	Crushed stone & Cement	1715 to 1700
Clay 40' 2781 to 2741	50'	Clay 1700 to 1650	
Bridge 10' 2500 to 2450	10'	Cement & C.S. 1650 to 1640	
Clay 20' 2490 to 2470	63'	Clay & Field Stone 1640 to 1577	
5' Crushed Stone 2470 to 2455	6'	Cement & Crushed Stone 1577 to 1568	
Bridge 15' 2420 to 2405	10'	Bridge 1430 to 1420	
10' Cement Crushed Stone 2405 to 2395	10'	Cement & C. Stone 1420 to 1410	
15' Bridge 2200 to 2155	210'	Filled Back 1410 to 1200	
10' Cement & Crushed Stone 2195 to 2175	15'	Cement & C.S. one 1200 to 1185	
6 5/8" Casing pulled 2164	11'	Bridge 993 to 987	
80' Clay 2175 to 2095		Clay Crushed Stone 987 to 956	
10' Bridge 2095 to 2085		Cemented Pittsburg Coal 956 to 872	
15' Cement & CS 2035 to 2070	70'	Clay 872 to 802	
30' Clay 2070 to 2040	10'	Bridge 515 to 405	
COAL BEAMS		DESCRIPTION OF MONUMENT	
(NAME)			
(NAME)			
(NAME)			
(NAME)			

and that the work of plugging and filling said well was completed on the 20 day of February, 1967.

And further deponents saith:

Sworn to and subscribed before me this 11 day of March, 1967.

My commission expires:

8/2/73

Notary Public.

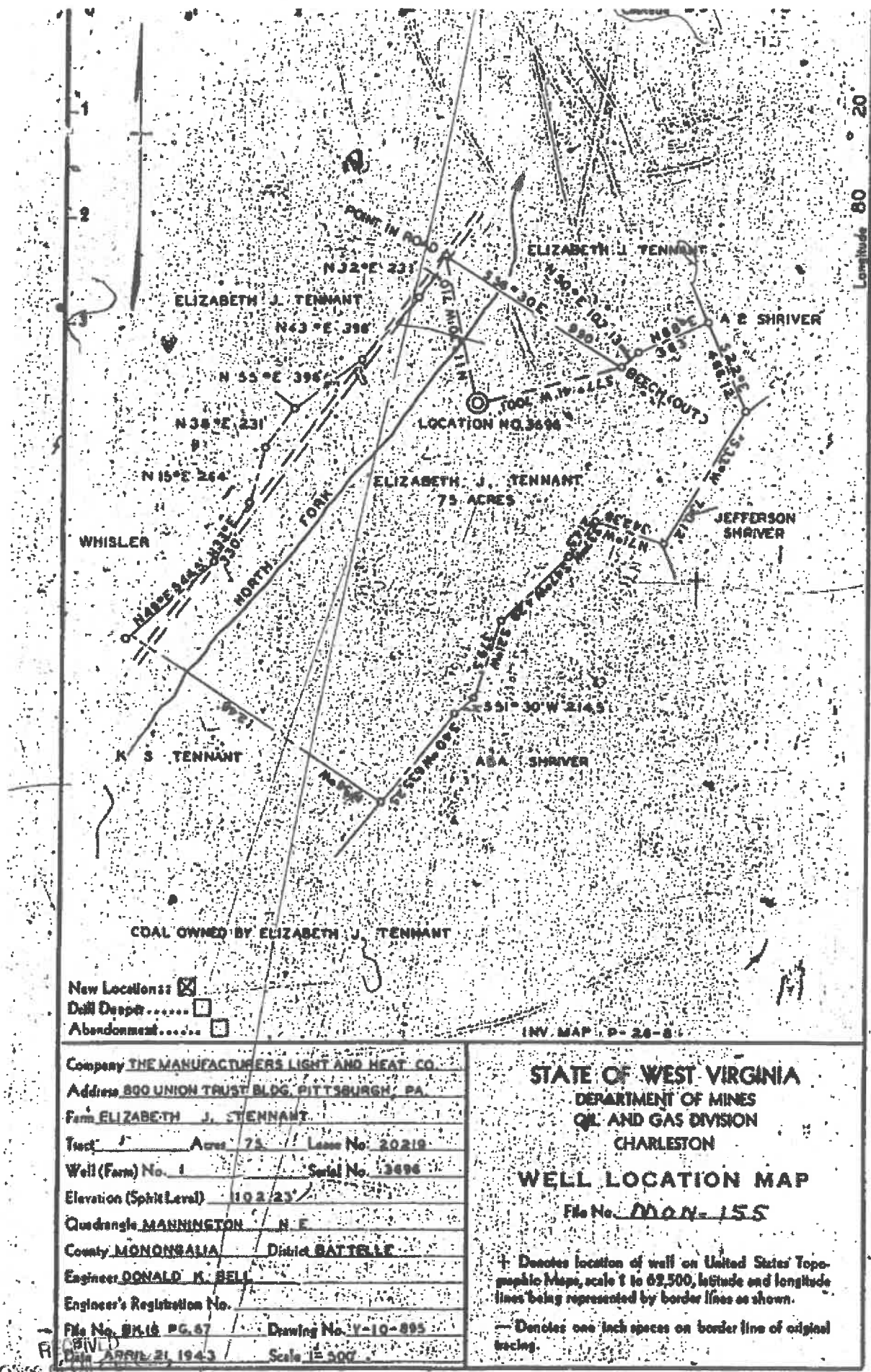
Permit No. 155

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09/18/2026



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Manning



STATE OF WEST VIRGINIA
DEPARTMENT OF MINES
OIL AND GAS DIVISION

WELL RECORD

Permit No. MON 155 Oil or Gas Well Gas

Company The Mfrs. Light & Heat Company
Address 800 Union Trust Bldg., Pittsburgh, Pa.
Farm Elizabeth J Tennant Acres 75
Location (waters) _____
Well No. 1 - 3696 Elev 1102
District Battelle County Monongalia
The surface of tract is owned in fee by Elizabeth J Tennant
R D 1 Address Burton, W. Va.
Mineral rights are owned by The Mfrs Light & Heat Co.
800 Union Trust Bldg. Address Pittsburgh, Pa.
Drilling commenced 7/7/43
Drilling completed 8/25/43
Date Shot _____ From _____ To _____
With _____ 9
Open Flow 2 1/2 bbls Water to _____ inch
10000 Mers. in _____ inch
Volume 82.717 Cu. Ft.
Rock Fr. 280 lbs 48 hrs.
Oil _____ bbls, 1st 24 hrs.
Fresh water 90 feet
Salt water _____ feet

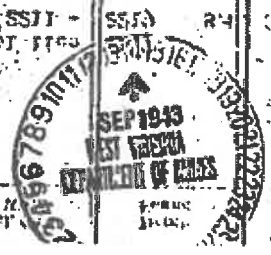
Casing and tubing	Used in Drilling	Left in Well	Packers
Size			
16			Kind of Pack
18			?
10 5/8	217' 5"	217' 5"	Size of
8 1/2	1403' 3"	1203' 3"	
8 1/2	2164' 8"	2164' 8"	Depth set
5 1/2			
2			Part. top
2			Part. bottom
Lines Used			Part. top
6"			Part. bottom

CASING CEMENTED _____ SIZE _____ No. Ft. _____ Date _____

COAL WAS ENCOUNTERED AT 906 FEET 72 INCHES
FEET INCHES FEET INCHES
FEET INCHES FEET INCHES

Formation	Color	Hard or Soft	Top	Bottom	Oil, Gas or Water	Depth Found	Remarks
Soil			0	50			
Red Rock			50	60			
Slate & Lime			60	445			
Slate & Shell			445	515			
Sand			515	555			
Slate & Lime			555	600			
Sand			600	652			
Slate & Lime			652	700			
Red Rock			700	705			
Lime			705	808			
Slate			808	814			
Lime			814	890			
Slate			890	906			
Pittsburgh Coal			906	912			
Lime			912	945			
Sand			945	955			
Shells			955	980			
Lime & Slate			980	1010			
Sand			1010	1072			
Slate & Lime			1072	1090			
Red Rock			1090	1095			
Slate			1095	1105			
Red Rock			1105	1108			
Lime			1108	1112			
Red Rock			1112	1120			
Slate & Lime			1120	1190			
Red Rock			1190	1200			
Slate, Shell	Lime		1200	1314			
Sand			1314	1330			
Lime & Slate			1330	1385			
Big Dunkard			1385	1404			
Slate & Lime			1404	1445			
Sand			1445	1497			
Lime, Slate, Shells			1497	1585			
Gas Sand			1585	1680			
Slate & Shells			1680	1730			
Sand			1730	1760			
Slate, Lime, Shell			1760	1895			
Sand			1895	1915			

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Formation	Color	Hard or Soft	Top	Bottom	Oil, Gas or Water	Depth Found	Remarks
Slate			1072	1074		2	
Lime			1074	1090		16	
Red Rock			1090	1095		5	
Slate			1095	1105		10	
Red Rock			1105	1108		3	
Lime			1108	1112		4	
Red Rock			1112	1120		8	
Slate			1120	1172		52	
Lime			1172	1185		13	
Slate			1185	1190		5	
Red Rock			1190	1200		10	
Slate&Shell			1200	1230		30	
Lime			1230	1265		35	
Slate			1265	1280		15	
Lime			1280	1311		31	
Slate			1311	1314		3	
Sand			1314	1330		16	
Lime			1330	1340		10	
Slate			1340	1365		25	
Lime			1365	1385		20	
Big Dunkard			1385	1404		19	
Slate			1404	1415		11	
Lime			1415	1435		20	
Slate			1435	1445		10	
Sand			1445	1497		52	
Lime			1497	1508		11	
Slate			1508	1520		12	
Lime			1520	1535		15	
Slate			1535	1550		15	
Shells			1550	1585		35	
Gas Sand			1585	1680		95	
Slate&Shells			1680	1730		50	
Sand			1730	1768		38	
Slate			1768	1770		2	
Lime			1770	1786		16	
Slate&Shell			1786	1870		84	
Lime			1870	1895		25	
Sand			1895	1915		20	
Slate&Shell			1915	1945		30	
Lime			1945	2008		63	
Red Rock			2008	2030		22	
Lime			2030	2062		32	
Slate			2062	2072		10	
Lime			2072	2088		16	
Slate			2088	2105		17	
Big Lime			2105	2200		95	
Big Injun Sand			2200	2412		212	
Slate			2412	2440		28	
Lime&Shells			2440	2700		260	
Sand			2700	2765		65	
Lime(Gritty)			2765	2838		73	
Slate			2838	2845		7	
50ft.Sand			2845	2920		75	
Slate			2920	2938		18	
30ft.Sand			2938	2961		23	
Slate			2961	2971		10	
Lime			2971	2980		9	
Red Rock			2980	2985		5	
Gordon Stray			2985	3038		53	
Pink Rock			3038	3041		3	
Gordon Sand			3041	3095		54	
Slate			3095	3100		5	
4th. Sand			3100	3134		34	
Slate			3134	3153		19	
5th. Sand			3153	3184		31	
Slate&Lime			3184	3438		280	
TOTAL DEPTH			3438				

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APPROVED

Sept 8
D.K. Moore

11/16

Copy

(Title)

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80' Clay 505 to 425
15' Cement and Crushed Stone 425 to 410
177' Clay 410 to 233
15' Bridge Clay Cement Crushed Stone 233 to 218
118' Clay 218 to 100
10' Cement Gravel 100 to 90
Clay 90 to 10
Erected 13ft. Monument Left 10ft. Above Ground



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STATE OF WEST VIRGINIA
DEPARTMENT OF MINES
OIL AND GAS DIVISION

INSPECTOR'S WELL REPORT

Permit No. MON 155

Oil or Gas Well Gas
(KIND)

Company <u>Manufactures Light & Heat Co.</u>	Casing and Tubing	Used In Drilling	Left In Well	Packers
Address _____	Size			
Farm <u>Elizabeth J. Tennant</u>	10 _____			Kind of Packer _____
Well No. <u>#3696</u>	13 _____			
District <u>Battelle</u> County <u>Monongalia</u>	10 _____	214		Size of _____
Drilling commenced <u>July 5, 1943</u>	8 1/4 _____	1394 17"		
Drilling completed _____ Total Depth _____	6 1/4 _____	2147'		Depth set _____
Date shot _____ Depth of shot _____	5 3/16 _____			
Initial Open Flow _____ /10ths Water in _____ Inch	3 _____			Perf. top _____
Open Flow after tubing _____ /10ths Merc. in _____ Inch	2 _____			Perf. bottom _____
Volume _____ Cu. Ft.	Liners Used _____			Perf. top _____
Rock Pressure _____ lbs. _____ hrs.				Perf. bottom _____
Oil _____ bbls., 1st 24 hrs.				
Fresh water _____ feet _____ feet				
Salt water _____ feet _____ feet				

CASING CEMENTED _____ SIZE _____ No. FT. _____ Date _____

906-912

COAL WAS ENCOUNTERED AT _____ FEET _____ INCHES

_____ FEET _____ INCHES _____ FEET _____ INCHES

_____ FEET _____ INCHES _____ FEET _____ INCHES

Drillers' Names Glen Cramer --Russell Null

Well Abandoned and Plugged _____, 19 _____

REMARKS: Drilling at 2300'

DRILLING PERMIT NOT POSTED. SUPT. PROMISED TO HAVE POSTED AUG. 6, 1943.

Aug. 5, 1943.

Office of Oil and Gas

AUG 20 2026

WV Department of
Environmental Protection

L W Young
DISTRICT WELL INSPECTOR

09/18/2026

STATE OF WEST VIRGINIA
DEPARTMENT OF MINES
OIL AND GAS DIVISION
INSPECTOR'S PLUGGING REPORT

Permit No. Mon-155-P

Well No. 3696

COMPANY D. K. Moore

ADDRESS _____

FARM Elizabethtown, Tennant DISTRICT Bell

COUNTY Marshall

Filling Material Used Clay Stone and Cement

Liner	Location	Amount	Packer	Location		
PLUGS USED AND DEPTH PLACED			BRIDGES	CASING AND TUBING		
CEMENT-THICKNESS	WOOD-SIZE	LEAD	CONSTRUCTION-LOCATION	RECOVERED	SIZE	LOST
T.O	3438					
Bridge	2797					
clay stone	2797-2781					
clay	2781-2741					
Bridge	2500'	Cement	2500-2490			
clay	2490-	2470				
Cement	2470-	2465				
clay stone	2465	2405				
Cement	2405	2395				

Drillers' Names

Don Hamilton Ray Eddy
Agent

Remarks:

1-23 67

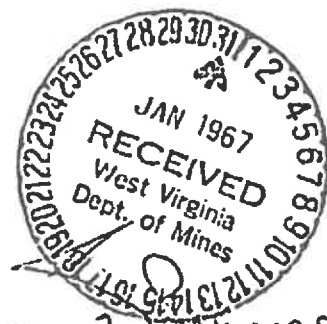
I hereby certify I visited the above well on this date.

DATE

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AUG 20 2026

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Environmental Protection



Bryan J. Roman
DISTRICT WELL INSPECTOR

09/18/2026

INSPECTOR'S PLUGGING REPORT

Well No. 3496

ADDRESS

DISTRICT 2014

COUNTY

Filling Material Used Clay Stone and Cement

Drillers' Names

Remarks:

U.S. Department of
Environmental Protection

AUG. 2 8-7076

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DATA

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West Virginia
Dept. of Mines

DISTRICT WILL 1945 PCTO

09/18/2026

09/18/2026

INSPECTOR'S PLUGGING REPORT

Well No. 69C

ADDRESS

DISTRICT

Batterie

COUNTY

Monogamy

Filling Material Used

Don Stone and Co.

Drillers' Names

Harry Hamilton Ray Elder

Remarks:

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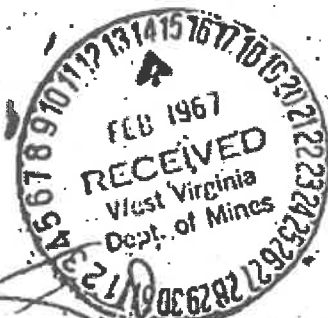
2-9-6

I hereby certify I visited the above well on this date.

DATE _____

Bengal Pharmacy

DISTRICT WILL INSPECTION



09/18/2026

STATE OF WEST VIRGINIA
DEPARTMENT OF MINES
OIL AND GAS DIVISION

INSPECTOR'S PLUGGING REPORT

Permit No. Mon-155-P

Well No. 3696

COMPANY D. R. Moore

ADDRESS _____

FARM Elizabeth Tennant DISTRICT Belle

COUNTY Monongalia

Filling Material Used Slag Silica Cement

Liner	Location	Amount	Packer	Location		
PLUGS USED AND DEPTH PLACED			DRIFTS	CASING AND TUBING		
CEMENT-THICKNESS	WOOD-SIZE	LEAD	CONSTRUCTION-LOCATION	RECOVERED	SIZE	LOST
16.50.	1640	-	Cement and Gravel.			
1640	-	1577	Clay and Gravel.			
1577	-	1548	Cement and Gravel.			
Bridge	1430					
1430	-	1440	Cement and Gravel.			

Drillers' Names

Don Hamelton and Ray Edley

Remarks:

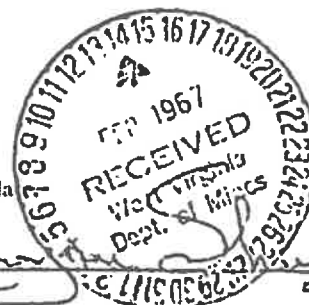
2-8-67
DATE

I hereby certify I visited the above well on this date

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DISTRICT WELL INSPECTOR

09/18/2026

OIL AND GAS DIVISION

Permit No. MOB-155-P

W.H. No. 3196

COMPANY D. K. Moore

ADDRESS

FARM Elizabeth Tennant

DISTRICT

Battle

COUNTY Manongui, 2

Linez

Location

Amount

Packers

Location[illegible]

Drillers' Names

Dear Hamilton. Ray Esler

Remarks: 0

2-7-67

I hereby certify I visited the above well on this date. West Virginia
of Mines

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Environmental Protection



DISTRICT WELL INSPECTOR

09/18/2026

INSPECTOR'S PLUGGING REPORT

Well No. W696

ADDRESS

FARM Elizabeth Tennant DISTRICT Bathurst COUNTY Monongalia

Filling Material Used Clay Stone and Cement

[illegible]

Drillers' Names

Don Hamilton Ray Eddy

Remarks:

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AUG 20 2026

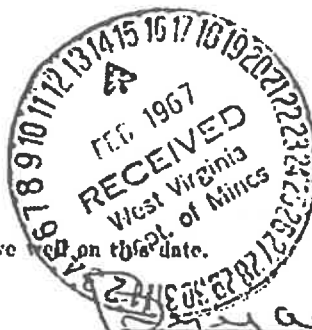
AUG 20 2026

WV Department of
Environmental Protection

Department of Protection

2-6 67

I hereby certify I visited the above



on this date.

Sydney Sherman
DISTRICT WELL INSPECTOR

DISTRICT WELL INSPECTOR

09/18/2026

INSPECTOR'S PLUGGING REPORT

Well No. 3696

Filling Material Used Clay Stone and Cement

Driters' Names

PAYE

I hereby certify I visited the above well on this date.

ABSTRACT WITH INDEXING

09/18/2026

STATE OF WEST VIRGINIA
DEPARTMENT OF MINES
OIL AND GAS DIVISION

THROSEBROOK OIL & GAS FIELD
INSPECTOR'S WELL REPORT

Permit No. MCN-155-POil or Gas Well
(KIND)

Company	CASING AND TUBING	USED IN DRILLING	LEFT IN WELL	PACKERS
<u>D.K. MOORE</u>	Size			
Address <u>FRIARVIEW, ES. VA.</u>	16			Kind of Packer
Farm <u>ELIZABETH J. TENNANT</u>	13			
Well No. <u>3896</u>	10			Size of
District <u>BRITTON</u> County <u>MCN.</u>	8 1/2			
Drilling commenced	6 3/8			Depth set
Drilling completed	3			Perf. top
Date shot	2			Perf. bottom
Initial open flow	Liners Used			Perf. top
/10ths Water in				Perf. bottom
Open flow after tubing				
/10ths Merc. in				
Volume	CASING CEMENTED	SIZE	No. FT.	Date
Cu. Ft.	NAME OF SERVICE COMPANY			
Rock pressure	COAL WAS ENCOUNTERED AT			
lbs.	FEET INCHES			
hrs.	FEET INCHES			
Oil	FEET INCHES			
bbls., 1st 24 hrs.	FEET INCHES			
Fresh water	FEET INCHES			
feet	FEET INCHES			
Salt water	FEET INCHES			
feet	FEET INCHES			
Drillers' Names				

Remarks:

REQUEST FOR FINAL - 5-27-67.

NO IDENTIFICATION ON MARKER
OPERATOR, WHO PROMISES TO TAKE IDENTIFICATION.

4-26-67

DATE

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WV Department of
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DISTRICT WELL INSPECTOR

09/18/2026



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WW-4A
Revised 6-07

1) Date: AUGUST 11, 2026

2) Operator's Well Number

MD-49

3) API Well No.: 47 -

061

- 00155

STATE OF WEST VIRGINIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION, OFFICE OF OIL AND GAS
NOTICE OF APPLICATION TO PLUG AND ABANDON A WELL

4) Surface Owner(s) to be served:

(a) Name RDFS LLC
Address 11023 MASON DIXON HWY
BURTON, WV 26562

(b) Name _____
Address _____

(c) Name _____
Address _____

6) Inspector ROBERT HITT
Address P.O. BOX 112
JANE LEW, WV 26378
Telephone (681) 344-4747

5) (a) Coal Operator

Name WEST VIRGINIA LAND RESOURCES INC.
Address 537 WILLIAMS RD.
MORGANTOWN, WV 26501

(b) Coal Owner(s) with Declaration

Name _____
Address _____

Name _____
Address _____

(c) Coal Lessee with Declaration

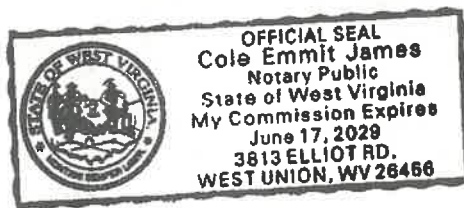
Name _____
Address _____

TO THE PERSONS NAMED ABOVE: You should have received this Form and the following documents:

- (1) The application to Plug and Abandon a Well on Form WW-4B, which sets out the parties involved in the work and describes the well its and the plugging work order; and
- (2) The plat (surveyor's map) showing the well location on Form WW-6.

The reason you received these documents is that you have rights regarding the application which are summarized in the instructions on the reverses side. However, you are not required to take any action at all.

Take notice that under Chapter 22 6 of the West Virginia Code, the undersigned well operator proposes to file or has filed this Notice and Application and accompanying documents for a permit to plug and abandon a well with the Chief of the Office of Oil and Gas, West Virginia Department of Environmental Protection, with respect to the well at the location described on the attached Application and depicted on the attached Form WW-6. Copies of this Notice, the Application, and the plat have been mailed by registered or certified mail or delivered by hand to the person(s) named above (or by publication in certain circumstances) on or before the day of mailing or delivery to the Chief.



Well Operator

WEST VIRGINIA LAND RESOURCES INC.

By:

DAVID RODDY

Its:

PROJECT ENGINEER

Address

537 WILLIAMS RD.

MORGANTOWN WV 26501

Telephone

(304) 534-4748

Subscribed and sworn before me this 12

day of

August 2026

Notary Public

My Commission Expires June 17, 2029

Oil and Gas Privacy Notice

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.

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9589 0710 5270 2343 3857 11

U.S. Postal Service CERTIFIED MAIL® RECEIPT Domestic Mail Only	
For delivery information, visit our website at www.usps.com	
OFFICIAL USE	
Certified Mail Fee	\$
Extra Services & Fees (check box, add fee as appropriate)	
☐ Return Receipt (hardcopy)	\$
☐ Return Receipt (electronic)	\$
☐ Certified Mail Restricted Delivery	\$
☐ Adult Signature Required	\$
☐ Adult Signature Restricted Delivery	\$
Postage	\$
Total Postage and Fees	\$
Sent To RDFS LLC	
Street and Apt. No., or PO Box No. 11023 Mason Dixon Hwy	
City, State, ZIP+4® Buckton, WV 26562	
PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instruction	



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WV Department of
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09/18/2026

WW-4B

API No. 47-061-00155
Farm Name _____
Well No. MD-49

**INSTRUCTIONS TO COAL OPERATORS
OWNERS AND LESSEE**

The well operator named on the obverse side of WW-4 (B) is about to abandon the well described in the enclosed materials and will commence the work of plugging and abandoning said well on the date the inspector is notified. Which date shall not be less than five days after the day on which this notice and application so mailed is received, or in due course should be received by the Department of Environmental Protection Office of Oil & Gas.

This notice and application is given to you in order that your respective representatives may be present at the plugging and filling of said well. You are further notified that whether you are represented or not the operator will proceed to plug and fill said well in the manner required by Section 24, Article 6, Chapter 22 of the Code and given in detail on obverse side of this application.

NOTE: If you wish this well to be plugged according to 22-6-24(d) then as per Regulation 35CSR4-13.9 you must complete and return to this office on form OB-16 "Request by Coal Operator, Owner, or Lessee for plugging" prior to the issuance of this plugging permit.

WAIVER

The undersigned coal operator X / owner X / lessee _____ / of the coal under this well location has examined this proposed plugging work order. 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.

Date: 8/12/20

By: [Signature]

Its Resident Agent

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Environmental Protection

09/18/2026

WW-9
(5/16)

API Number 47 - 061 - 00155
Operator's Well No. _____

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

Operator Name WEST VIRGINIA LAND RESOURCES INC. OP Code _____

Watershed (HUC 10) NORTH FORK OF WEST VIRGINIA FORK OF DUNKARD CREEK Quadrangle WADESTOWN W.VA, PA

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: _____

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

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 Tanks, see attached letter)

Will closed loop system be used? If so, describe: Yes. Gel circulated from tank thru well bore and returned to tank

Drilling medium anticipated for this well (vertical and horizontal)? Air, freshwater, oil based, etc. Gel or Cement

-If oil based, what type? Synthetic, petroleum, etc.

Additives to be used in drilling medium? Bentonite, Bicarbonate of Soda

Drill cuttings disposal method? Leave in pit, landfill, removed offsite, etc. Shaker cutting buried on site

-If left in pit and plan to solidify what medium will be used? (cement, lime, sawdust) N/A

-Landfill or offsite name/permit number? N/A

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 [Signature]

Company Official (Typed Name) David Roddy

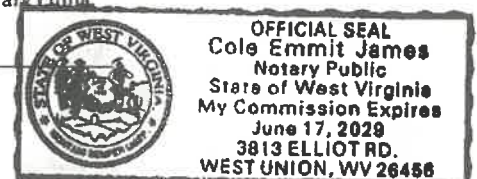
Company Official Title Project Engineer

Subscribed and sworn before me this 12 day of August, 2026

Cole James

Notary Public

My commission expires June 17, 2029



09/18/2026

MD-47

Proposed Revegetation Treatment: Acres Disturbed 1 Prevegetation pH _____Lime 3 Tons/acre or to correct to pH 6.0Fertilizer type 10-20-20 or equivalentFertilizer amount 500 lbs/acreMulch 2 Tons/acreSeed MixturesTemporaryPermanent

Seed Type	lbs/acre	Seed Type	lbs/acre
See Attachment	<u>100</u>	See Attachment	<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.

Plan Approved by: Robert J. Hitt

Comments: _____

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WV Department of
Environmental ProtectionTitle: OG Inspector Date: 8-14-26Field Reviewed? ☐ Yes ☐ No

09/18/2026

Consolidation Coal Company
Northern West Virginia Operations
1 Bridge Street
Martinsburg, WV 26554

phone: 304-534-4748
fax: 304-534-4739
e-mail: ronnieharsh@consolidationwv.com
web: www.coalsource.com

*Name: RONNIE HARSH
*title: Project Engineer

April. 7, 2014

Department of Environmental Protection
Office of Oil and Gas
601 57th Street, SE
Charleston, WV 25304-2345
Phone: (304) 926-0499
Fax: (304) 926-0452

To Whom It May Concern:

As per the Department of Environmental Protection, Office of Oil and Gas request, Consolidation Coal Company, Northern West Virginia Operations, submits the following procedures utilizing pit waste.

Upon submitting a well work application (without general permit for Oil and Gas Pit Waste Discharge Application), Consolidation Coal Company, Northern West Virginia Operations, will construct no pits, but instead will use mud tanks to contain all drilling muds.

Once the well is completed, that material (minus the cave material) will be trucked to the next well to be plugged or to DEP impoundment facilities number U-78-83, U-104-83, or U-1011-93.

Sincerely,



Ronnie Harsh
Project Engineer

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1. The first step is to identify the problem. This is often done by asking the question "What is the problem?" and then trying to define it in as many ways as possible. This is done by asking the question "What is the problem?" and then trying to define it in as many ways as possible.

PICKLE F
 CROCK-POT
 COATING F
 FERMENTAL
 CLOVER
 COATING F
 LIMOYNY
 BROSFO
 COATING F
 LEADING C
 COATING F

FBI GETTING A WARRANT
 IT SEEMS HE WILL CONFESS
 THE LASEL DESCRIPTION OF PEOPLE
 A FEDERAL AND FEDERAL LAWS
 WITHIN THE TOLERANCE W
 HAVE NO WARRANTS EITHER
 A LIVED OF MEMORABILITY
 THE LASEL PURPOSE OF OTHERS
 WHICH WOULD BE TO BE TO
 RESISTANCE 4000 W. EVENT
 LASEL. FIVE SIX SEVEN
 SIX SEVEN SEVEN SEVEN
 SEVEN SEVEN SEVEN SEVEN
 SEVEN SEVEN SEVEN SEVEN

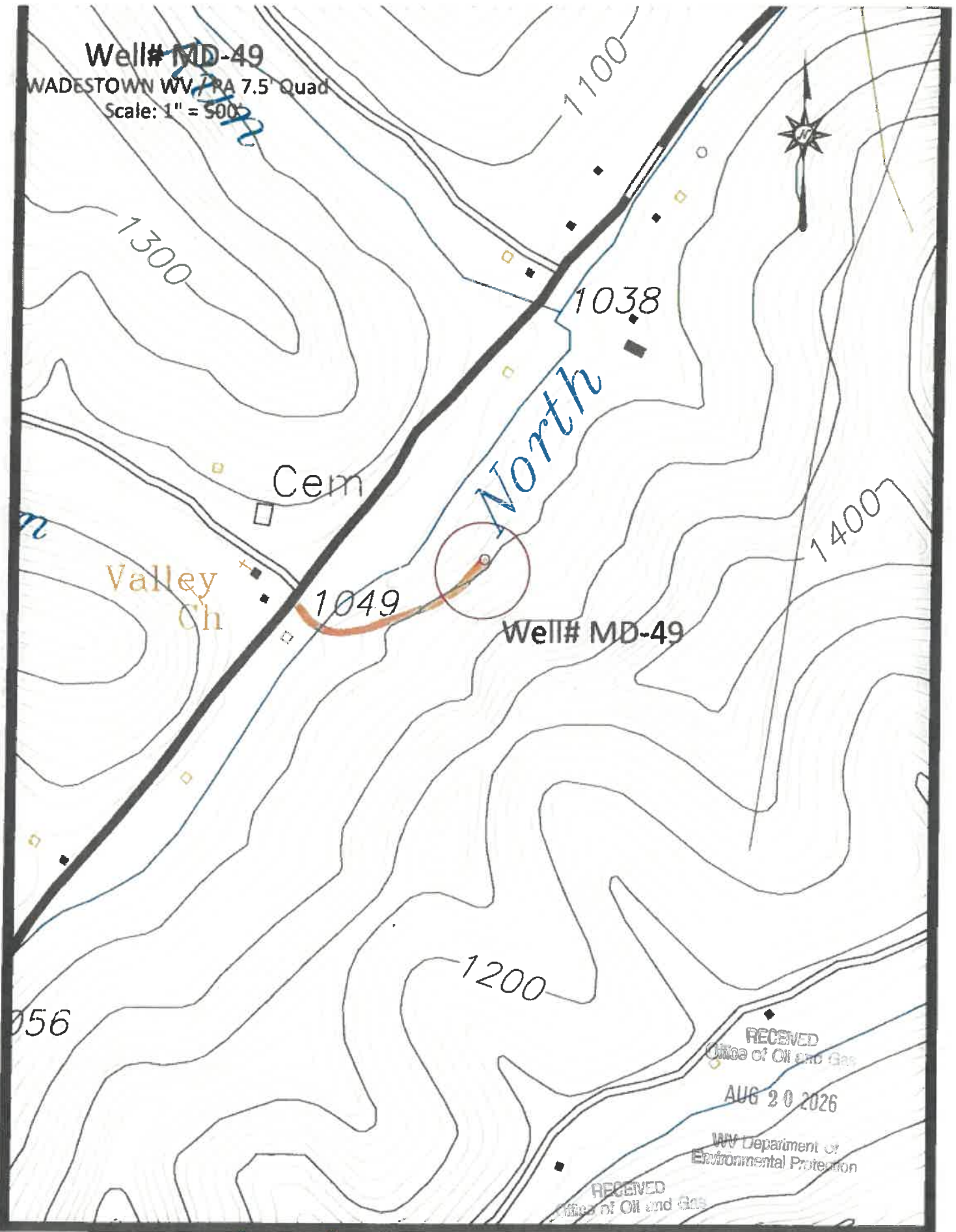
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09/18/2026

Well# MD-49

WADESTOWN WV / RA 7.5' Quad

Scale: 1" = 500'



056

1038

Cem

Valley Ch

1049

Well# MD-49

1200

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Access Road

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42°30'

4395

4394

4393 IN NW
(HUNDRED)

4392

4391

40'

HUNDRED 6.2 MI.
OTTONTOWN 3.4 MI.

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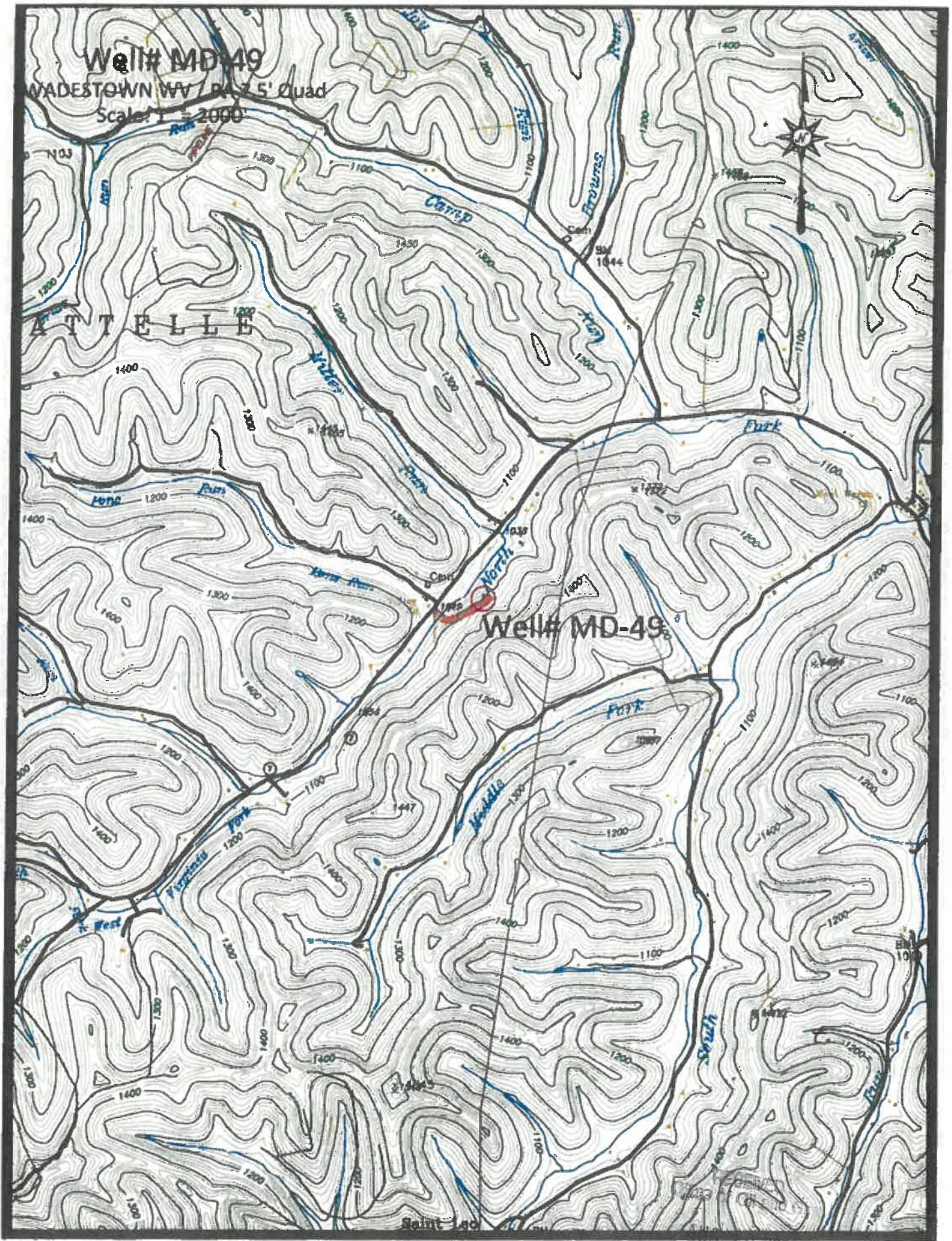
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WV Department
Environmental Protection

WELL# MD-49

'Wadestown; WV, PA' Scale: 1" = 0.379MI 610M 2,000Ft, 1 Mi = 2.640", 1 cm = 240M

09/18/2026



Well# MD-49

WADESTOWN WV / PA 7 S' Quad

Scale: 1" = 2000'

ATTELLE

Well# MD-49

Atlas Road

09/18/2026
WV Department of
Environmental Protection

WW-7
8-30-06



West Virginia Department of Environmental Protection
Office of Oil and Gas

WELL LOCATION FORM: GPS

API: 47-061-00155 WELL NO.: MD-49
FARM NAME: ELIZABETH J. TENNANT
RESPONSIBLE PARTY NAME: WEST VIRGINIA LAND RESOURCES INC.
COUNTY: MONONGALIA DISTRICT: BATTELLE
QUADRANGLE: WADESTOWN W.VA, PA
SURFACE OWNER: RDFS LLC
ROYALTY OWNER: _____
UTM GPS NORTHING: 4,391,437 m
UTM GPS EASTING: 554,581 m GPS ELEVATION: 338 m

The Responsible Party named above has chosen to submit GPS coordinates in lieu of preparing a new well location plat for a plugging permit or assigned API number on the above well. The Office of Oil and Gas will not accept GPS coordinates that do not meet the following requirements:

1. Datum: NAD 1983, Zone: 17 North, Coordinate Units: meters, Altitude: height above mean sea level (MSL) - meters.
2. Accuracy to Datum - 3.05 meters
3. Data Collection Method:

Survey grade GPS ☒ : Post Processed Differential _____
Real-Time Differential ☒

Mapping Grade GPS _____ : Post Processed Differential _____
Real-Time Differential _____

4. Letter size copy of the topography map showing the well location.

I the undersigned, hereby certify this data is correct to the best of my knowledge and belief and shows all the information required by law and the regulations issued and prescribed by the Office of Oil and Gas.

Signature

Title

Date

AUGUST 11, 2026

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09/18/2026



Kennedy, James P <james.p.kennedy@wv.gov>

plugging permit issued for 4706100155

1 message

Kennedy, James P <james.p.kennedy@wv.gov>

Wed, Sep 16, 2026 at 9:29 AM

To: Robert J Hitt <robert.j.hitt@wv.gov>, "Roddy, David" <DavidRoddy@acnrinc.com>, mtrach@wvassessor.com

To whom it may concern, a plugging permit has been issued for 4706100155.

--

James Kennedy

Environmental Resource Specialist III / Permitting

WVDEP Office of Oil and Gas

601 57th Street, SE

Charleston, WV 25304

304-926-0499 ext. 45025

james.p.kennedy@wv.gov**4706100155.pdf**

4827K

09/18/2026