



ECMC FRESH WATER PLAN OPERATOR GUIDANCE

FORM 2A

Rule 304.c.(18). - Fresh Water Plan

Document Control

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Rule Citation

304.c.(18). Fresh Water Plan

A plan identifying the sources of Fresh Water to be used for drilling and completion operations including:

- A. The planned source and volume of all surface water, Groundwater, and any other sources of Fresh Water to be used and the coordinates of the planned source of Fresh Water; and
- B. The seller's name and address if Fresh Water is to be purchased.

905.a.(3). Reuse and Recycling

To encourage and promote waste minimization, Operators may propose plans for managing E&P Waste through beneficial use, reuse, and recycling by submitting a written management plan to the Director for approval on a Form 4, Form 15, or Form 28, Centralized E&P Waste Management Facility Permit. Such plans will describe, at a minimum:

- A. The type(s) of waste;

- B. The proposed volume and use of the waste;
- C. The method of waste treatment and storage;
- D. Recycled materials quality assurance;
- E. Final disposition of the waste;
- F. A copy of any certification or authorization that may be required by other laws and regulations;
- G. A proposed timeline for reuse and recycling;
- H. Beneficial use criteria;
- I. Anticipated method of transporting waste; and
- J. Any additional information requested by the Director.

Purpose of Water Plan

The Fresh Water Plan provides ECMC with information regarding the source and quantity of Fresh Water that will be used at a location for construction, drilling, and completion activities.

Guidance/Requirements

Set of Requirements

1. Identify the planned source (groundwater, surface water, or mixed) and volume to be used per operational activity described in a narrative or table format, with GPS coordinates of the location in latitude and longitude. A redacted version of the GPS coordinates can be provided, but an unredacted version will be submitted to ECMC and held confidential per Rule 223.
2. Include the seller's name and address, if water is to be purchased. If the water owners do not want to be identified publicly, provide a redacted version on the Form 2A and an unredacted version to the ECMC LAS Supervisor during the

review process, to be held confidential per Rule 223. If the water is owned by the Operator, the Operator name should be listed with the latitude and longitude coordinates of the water source.

3. If recycled or reused water is anticipated to be used, provide a description of the source of that water, background concentrations of chemicals listed in Table 437-1, anticipated method of transporting the water, and anticipated volumes to be used, in addition to the reuse and recycling plan requirements of Rule 905.a.(3).
4. If fresh water is anticipated to be used, provide an explanation in the plan as to why the Operator does not intend to use recycled or reused water.

Additional Information

Common Errors and Issues Encountered by ECMC Staff

1. LAS Staff receive such heavily redacted Water Plans that the plans cannot be effectively reviewed. Operators must send the unredacted versions to the assigned LAS Staff during the review process when it is requested.
2. The quantity of water used for each operational activity does not match the quantity listed on the Form 2B. These quantities must match.

General Notes

1. If preferred, a table can be used in place of a narrative to describe the water source, quantity used per operational activity, and location of the water source.

Frequently Asked Questions

1. N/A

Definition

FRESH WATER means water that is not Produced Water or Recycled Produced Water Alternative, except as used in Rule 408.

Document Change Log

Change Date	Description of Changes
May 5, 2025	Guidance revised to match updated Rules
June 3, 2025	Reviewed
June 20, 2025	ADA accessibility verified, prepared for publication