April 3, 2019

Ms. Kavita Kale
Executive Secretary
Michigan Public Service Commission
7109 W. Saginaw Highway
P.O. Box 30221
Lansing, MI 48917

Re: Commission’s own Motion
MPSC Case No. U-16230

Dear Ms. Kale:

Enclosed for filing on behalf of Riverside Energy Michigan, LLC in the above captioned case is the following:

1. Riverside Energy Michigan, LLC’s Motion to Amend the October 27, 2015 Order Establishing Requirements for an Antrim Natural Gas Well, Pool, or Field to Operate Under a Vacuum;
2. Appearances for Michael G. Oliva and Mark A. Iafrate; and
3. a Proof of Service.

Please contact the undersigned if you have any questions.

Very truly yours,

LOOMIS, EWERT, PARSLEY, DAVIS & GOTTING, P.C.

Michael G. Oliva
MGO:kms
Enclosures
cc: Parties of Record
In the matter, on the Commission’s own motion, )
To consider the appropriate regulatory response )
To proposals by various producers of natural )
Gas from Antrim Shale Formation to operate their )
Wells under a vacuum. )

RIVERSIDE ENERGY MICHIGAN, LLC’S MOTION TO AMEND THE OCTOBER 27, 2015 ORDER ESTABLISHING REQUIREMENTS FOR AN ANTRIM NATURAL GAS WELL, POOL, OR FIELD TO OPERATE UNDER A VACUUM

RIVERSIDE ENERGY MICHIGAN, LLC (“Riverside”), by its counsel, Loomis, Ewert, Parsley, Davis & Gotting, P.C. moves, pursuant to Rule 432 of the Rules of the Practice and Procedure before the Michigan Public Service Commission, R 792.10432, to amend the requirements for operation of wells under vacuum approved in the October 27, 2015 Order of the Michigan Public Service Commission (the “Commission”) in Case No. U-16230, and in support thereof, states as follows:

PARTIES

1. Riverside Energy Michigan, LLC is a Michigan limited liability company with its principal offices located at 10691 East Carter Road, #201, Traverse City, Michigan 49684.

2. Riverside operates thousands of gas wells throughout Michigan and Indiana, approximately 2,600 of which are located in the Antrim Shale Formation (“Antrim Shale”). Pursuant to the Commission’s approval in Case No. U-16230, Riverside operates the vast majority of its 2,600 Antrim Shale wells under vacuum and has done so since 2016. Riverside operates wells under vacuum in the following 88 Antrim Shale fields:

FACTUAL HISTORY

3. On April 27, 2010, the Commission opened this docket and issued an Order, on its own motion, in response to numerous applications requesting approval to operate under vacuum in the Antrim Shale filed pursuant to Mich Admin Code, R 460.876, which prohibits operators from operating wells under vacuum without Commission approval. On May 14, 2015, the Commission issued an Order finding that the applications should be conditionally granted subject to compliance with certain reporting and operating requirements to be developed by the Commission Staff. The Commission Staff filed its proposed reporting and operating requirements on July 13, 2015, which the Commission opened for comment by interested parties. After accepting and reviewing comment from numerous interested parties, the Commission Staff filed revised reporting and operating requirements. The Commission, on October 27, 2015, entered an Order (“October 27, 2015 Order”) finding that all future and current natural gas wells producing from the Antrim Shale and operating under a vacuum must comply with the requirements set forth in the October 29, 2015 Erratum attachment entitled Requirements for an Antrim Natural Gas Well, Pool, or Field to Operate Under a Vacuum (“Requirements”). Since then, all natural gas
wells produced from the Antrim Shale operating under a vacuum have been subject to the Requirements.

**PROPOSED AMENDMENT**

4. Riverside brings this Motion to amend the Requirements based on its experience in operating thousands of wells under vacuum, pursuant to the Requirements, since 2016.

5. Riverside’s motion is supported by the affidavit of its Production Manager, James Schramski, attached hereto as *Exhibit 1*. Mr. Schramski oversees the operations of Riverside’s 88 Antrim Shale fields containing wells operated under vacuum, including Riverside’s compliance with the Requirements. See Affidavit of James Schramski, ¶ 2.

6. In order to assist the Commission in reviewing the proposed amendments to the Requirements, Riverside has attached hereto *Exhibit 2*, setting forth by underlining and strikeout, the proposed changes to the Requirements.

7. Riverside proposes the following four changes to the Requirements as set forth in the Commission’s October 25, 2015 Order.

   A. **IV.B: Vacuum Pressures Should be Monitored and Recorded on a Monthly Basis.**

   Requirement IV.B provides that operators must monitor and record the vacuum pressure for all Antrim Shale wells on a weekly basis. Requirement VI.A requires that operators then report on an annual basis the average monthly vacuum pressure for each well. Weekly trips to Riverside’s numerous wells, many of which are located in remote areas, has imposed a significant burden on Riverside. *See Affidavit of James Schramski, ¶ 8.* At times, extreme weather conditions have posed a significant challenge to collecting weekly pressure recordings at certain well sites due to difficulty accessing them and concern for personnel safety. *Id.* Further, weekly readings of vacuum pressures do not provide significant insight beyond that provided by a single monthly reading, as
there is little variation in the pressure of a well-established vacuum well. Id. By amending Requirement IV.B to allow for monthly vacuum pressure readings, the Commission would significantly reduce the burden faced by operators of large-scale vacuum operations such as Riverside. For these reasons, Requirement IV.B should be amended pursuant to the form attached hereto as Exhibit 2.

B. **V.B: Only When the Addition of Compressors, Pumps, or Other Devices is Related to Vacuum Operations, Should Notice to be Commission be Required.**

As it currently reads, Requirement V.B requires that operators “file a notification prior to the addition of compressors, pumps, or other devices that will be added” to an Antrim Shale field or project operating under a vacuum. By its plain language, this requires that operators notify the Commission of the addition of any devices to an Antrim Shale field, regardless of whether the addition is related to vacuum operations. For operators such as Riverside, this would result in numerous notifications per year that are unrelated to its vacuum operations. See Affidavit of James Schramski, ¶ 9. Michigan Administrative Code Rule 460.867 mirrors Requirement V.B stating that “No gas well, pool, or field shall be placed under vacuum by the use of compressors, pumps or other devices except with the approval of the commission.” Mich Admin Code, R 460.867. Pursuant to Rule 460.867 and the purpose of this Docket, it is likely that the Commission only intended to receive notification when operators added compressors, pumps, and other devices relating to vacuum operations. For this reasons, Requirement V.B should be amended pursuant to the form attached hereto as Exhibit 2 to reflect that intent.

C. **VI.A(2): An Economic Analysis of Fuel Consumption Versus the Estimated Incremental Production Should be Required Only for the First Twelve Months of Operations.**

Requirement VI.A(2) requires that operators report “an annual analysis of fuel consumption versus the estimated incremental production” of the well. This requirement was
implement by the Commissions for three reasons: (1) to fulfill its mandate “to prevent the waste of natural gas in producing operations and in the piping and distribution thereof and to make rules and regulations for that purpose”; (2) to fulfill its mandate “gather data and compile statistics showing production of gas from all wells, fields or pools”; and (3) because the information may be beneficial to other jurisdictions considering allowing vacuum operations. See Order Approving Requirements for Vacuum Operations, MPSC Case No U-16230, page 5; MCL 483.114; Mich Admin Code, R 460.855(3)(d).

Requiring a fuel consumption analysis for the first twelve months of operations would decrease the reporting burden on vacuum operators and satisfy the Commission’s three rationale above. First, the first twelve months of operations satisfactorily indicate whether vacuum operations will result in positive overall production. In Riverside’s experience, compressor fuel consumption rarely, if ever, exceeds gas production after the first twelve months of operations. See Affidavit of James Schramski, ¶ 10. Further, vacuum operators will independently and satisfactorily monitor fuel consumption and prevent waste to ensure profitable operations without oversight by the Commission. Second, operators in the Antrim Shale remain required to report to the Commission their delivered gas volumes on a monthly basis. The amendment will not affect the Commission’s mandate to gather data on gas well production under Mich Admin Code, R 460.855 because gas consumption is unrelated to well production. Third, vacuum operators will continue to provide the Commission with a fuel consumption analysis for the first twelve months of operations. This information will continue to assist other jurisdictions in determining the feasibility of operating wells under vacuum. For these reasons, the Requirements should be amended pursuant to the form attached hereto as Exhibit 2 to require that operators report a fuel consumption analysis for the first twelve months of operations.
D. VI.C: Operators That Operate Multiple Facilities Should Be Allowed to Submit One Report Containing the Necessary Data for All Facilities They Operate.

Riverside operates 88 natural gas fields that contain wells operated under vacuum in the Antrim Shale. Pursuant to Requirement VI.A, operators of natural gas wells operated under vacuum in the Antrim Shale must file an annual report for “each Antrim field or project.” This means that for the year 2018, Riverside was required to file 88 separate reports with the Commission. See Affidavit of James Schramski, ¶ 11. Numerous other Antrim vacuum operators have done the same, resulting in hundreds of filings in the docket for this Case. This significant burden has resulted in unnecessary expense, complication, and waste. Filing a single, consolidated report will not affect the data provided to the Commission or its accessibility. While some operators have begun filing a single, consolidated report, there is no authority to do so under the Requirements. For this reason, the Requirements should be amended pursuant to the form attached hereto as Exhibit 2 to allow for operators to submit a single filing for all fields and projects that contain natural gas wells operated under vacuum.

8. Riverside proposes that the Commission approve the requested amendments to the Requirements using the same comment procedure that it used in adopting the Requirements, rather than holding contested case hearings on the proposed amendment. A contested case proceeding would involve unnecessary delay and cost to the parties and to the Commission.
CONCLUSION AND RELIEF

Riverside respectfully requests that this Commission amend the Requirements for an Antrim Natural Gas Well, Pool, or Field to Operate Under a Vacuum, as established in the Commission’s October 27, 2015 Order, to reflect the changes as set forth in Exhibit 2 attached hereto and further discussed above.

Respectfully submitted,

RIVERSIDE ENERGY MICHIGAN, LLC

Dated: April 3, 2019

Michael G. Oliva
Mark A. Iafrate
Loomis, Ewert, Parsley, Davis & Gotting PC
124 W. Allegan St, Suite 700
Lansing, MI 48933
mgoliva@loomislaw.com
517-318-9266
STATE OF MICHIGAN  
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter, on the Commission’s own motion,  
to consider the appropriate regulatory response  
to proposals by various producers of natural  
gas from Antrim Shale Formation to operate their  
wells under a vacuum.  

Case No. U-16230

AFFIDAVIT OF JAMES SCHRAMSKI IN SUPPORT OF RIVERSIDE  
ENERGY MICHIGAN, LLC’S MOTION TO AMEND THE OCTOBER 27,  
2015 ORDER ESTABLISHING REQUIREMENTS FOR AN ANTRIM NATURAL  
GAS WELL, POOL, OR FIELD TO OPERATE UNDER A VACUUM

STATE OF MICHIGAN  
) ss.

LEELANAU COUNTY  
)

Jim Schramski, being first sworn states:

1. I have personal knowledge of the facts set forth in this Affidavit and file it in support of Riverside Energy Michigan, LLC’s Motion to Amend the October 27, 2015 Order Establishing Requirements for an Antrim Natural Gas Well, Pool, or Field to Operate Under a Vacuum (“Motion”). If sworn as a witness, I could testify to the truth of the matters set forth in this Affidavit.

2. I am Jim Schramski, Production Manager at Riverside Energy Michigan, LLC (“Riverside”). I have been employed in that capacity since April 2016. As part of my general responsibilities as Production Manager for Riverside, I oversee the operations of Riverside’s 88 Antrim Shale fields operated under vacuum, which includes overseeing compliance with the Michigan Public Service Commission’s (the “Commission”) Requirements for an Antrim Natural Gas Well, Pool, or Field to Operate Under a Vacuum (the “Requirements”). My responsibilities also include preparation of the operating budget, which includes workovers and planning for major maintenance and/or modifications to
facilities, including compression. Prior to fulfilling the role of Production Manager with Riverside, I have held the following positions with prior owners and operators of the Antrim assets now operated by Riverside: Petroleum Engineer with Atlas Gas & Oil Company from 2008 to 2011, where I was responsible for the drilling and completion of wells in the New Albany Shale in southern Indiana and Antrim Shale in northern lower Michigan, and Production Engineer with Chevron Michigan, LLC from 2011 to 2016, where I was responsible for maintaining and enhancing production from Antrim wells and designing the associated facilities.

3. The information provided in this Affidavit is based on my first-hand knowledge of Riverside’s operation of wells operated under a vacuum in the Antrim Shale and its compliance with the Commission’s Requirements.

4. With its Motion in the above Case, Riverside is requesting that the Commission amend its Order dated October 27, 2015 by entering an Order amending the Requirements in a manner consistent with Exhibit 1 of the Motion.

5. Riverside operates approximately 2,600 wells located in the Antrim Shale, the vast majority of which are operated under vacuum pursuant to the Commission’s approval in this Case. In total, Riverside operates 88 natural gas fields in the Antrim Shale that contain wells operated under vacuum. These 88 fields are:

Clearwater 2, Chief Creek, Chestonia, Chester Fox 12, Chester 22, Chester 16, Chester 7, Chessplay, Charlton 19, Central Lake 15, Central Lake 13, Carbon Black, Canada Creek Ranch, Brush Limbaugh, Brady Bunch, Blue Sky, Blue Herron, Big Wolf, Bengal 32, Beaver Lake, Bear Lake 29, Bear Lake 9, Bagley 30, Bagley 16, Arthur Miller, and Albert 1.

6. Riverside has operated some or all of these fields for the years of 2016, 2017, and 2018; has done so pursuant to the Requirements; and has filed the appropriate annual reports with the Commission.

7. A number of issues have arose in my time overseeing compliance with the Requirements as Production Manager for Riverside. To resolve these issues, I believe minor amendments are necessary to the Requirements in order to facilitate the practical, safe, and economical reporting and operating of wells under a vacuum.

8. In order to comply with Requirement IV.B, operators must monitor and record on a weekly basis the vacuum pressure for all Antrim wells operated under a vacuum. This requirement has imposed a significant burden on Riverside personnel by requiring weekly trips to thousands of well sites, many of which are located in remote areas. At times, extreme weather conditions have posed a significant challenge to collecting weekly pressure recordings at certain well sites due to difficulty accessing them and concern for personnel safety. Pursuant to Requirement VI.A, only monthly vacuum pressure averages are reported annually to the Commission. In my experience as Production Manager for Riverside, the average weekly vacuum pressure does not provide significant insight beyond that provided by a single monthly reading. Such incremental benefits, if any, are not justified by the added administrative and personnel expense imposed by weekly visits. It is my belief that Requirement IV.B should mandate monthly vacuum casing pressure monitoring.
9. In order to comply with Requirement V.B, operators must “file a notification prior to the addition of compressors, pumps, or other devices that will be added” to an Antrim field or project operating under a vacuum. It is Riverside’s belief that this Requirement mandates that it notify the Commission of the addition of any device to a well operated under a vacuum even if the device is unrelated to vacuum operations. If Riverside was to follow this requirement as written, it would result in numerous notifications per year that are unrelated to its vacuum operations. It is my belief that Requirement V.B should mandate notification to the Commission only when the addition of compressors, pumps, and other devices are related to vacuum operations.

10. In order to comply with Requirement VI.A(2), operators must annually report an analysis of fuel consumption compared to the estimated incremental production from vacuum operations. In my experience as Production Manager for Riverside’s thousands of wells operated under a vacuum in the Antrim Shale and as can be observed in Riverside’s numerous annual reports in this docket, fuel consumption rarely, if ever, significantly changes past the first twelve months of operations. Additionally, compressor fuel consumption rarely, if ever, exceeds gas production. It is my belief that Requirement VI.A(2) should mandate the reporting of a fuel consumption analysis only for the first twelve months of vacuum operations.

11. In order to comply with Requirement VI.A, operators must file an annual report for each separate Antrim field or project. Accordingly, Riverside has filed separate annual reports for each Antrim field containing wells operated under a vacuum. For 2018, Riverside filed 88 separate reports on this docket, resulting in an unnecessary administrative burden and expense. Riverside is able to compile the information requested by the Commission into a single filing for all 88 fields containing wells operating under a vacuum without jeopardizing the data or its accessibility. It is
my belief that Requirement V should allow for operators to submit a single report covering all of their fields or projects operated under a vacuum.

Further Affiant sayeth not.

James Schramski  
Production Manager, Riverside Energy Michigan, LLC

The foregoing instrument was acknowledged before me this 3rd day of April, 2019, by James Schramski.

Patrick John Thon  
Notary Public  
Leelanau County, Michigan  
My Commission Expires 2-14-2024  
Acting in Leelanau County, Michigan
MPSC Case No. U-16230

Exhibit 2
STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter, on the Commission's own motion, to consider the appropriate regulatory response to proposals by various producers of natural gas from Antrim Shale Formation to operate their wells under a vacuum.

Requirements for an Antrim Natural Gas Well, Pool, or Field to Operate Under a Vacuum

I. Introduction

These requirements were developed pursuant to Mich Admin Code R, 460.867 and the Commission's May 14, 2015 order in Case No. U-16230.

II. General Application Requirements

For the purpose of this document:

“Compressors, pumps, or other devices” means compressors, pumps, or any other surface equipment that could be used to draw a well below atmospheric pressure.

A. As provided in Mich Admin Code R 460.867, an operator shall not operate an Antrim natural gas well under vacuum without prior Commission approval. Pursuant to the May 14, 2015 order in Case No. U-16230, Antrim natural gas well operation under vacuum is conditionally approved for all operators subject to compliance with the informational and operational requirements set forth here.

B. An operator shall submit an application to operate one or more natural gas wells under vacuum on an Antrim field or project basis. If one or more wells are to be operated under vacuum, the entire Antrim field or project must meet the requirements set forth in this document.

C. At least 10 days prior to filing an application to operate a well or project under vacuum, notice by certified first class mail shall be sent to any lease owners and operators adjoining the proposed project or well location. The notice shall contain at a minimum: the MPSC Well Connection Permit Number, the MDEQ Drilling Permit Number, the Well Name, and the MPSC Field ID Number.

D. All applications, notifications under Section V, and annual reports shall be submitted electronically in this docket. Applications, notifications under Section V, and annual reports shall also be provided to the Department of Environmental Quality’s Office.
of Oil, Gas, and Minerals, electronically via email to DEQ-GeologicalRecords@michigan.gov with “U-16230” included in the subject line.

E. A filing by an operator showing that these requirements have been met shall constitute a request to operate a well or wells under vacuum. Absent an objection by Staff, the request is granted 60 days from its filing. The May 14, 2015 order states:

Following 60 days from the filing of the appropriate request and meeting the initial six month waiting period, a natural gas well may be operated under vacuum unless the Staff files an objection to the request in this docket stating the specific reasons why operations under vacuum for that well and its associated systems should not proceed.

III. Application Verification and Required Documentation

A. Each Antrim field or project application to operate under a vacuum, shall include the actual or estimated monthly fuel consumption during the two years preceding the date of the application.

B. Each Antrim field or project application to operate under a vacuum, shall include a statement by the operator that a review has been completed verifying that all gas pipelines, well production casings, and tubings are suitable for operation under vacuum based on the design, specifications, and operating history.

C. Each Antrim field or project application to operate under a vacuum, shall include records of test results demonstrating that all gas pipelines, valves, fittings, and connections intended to be subject to a vacuum were tested at a pressure and duration that is adequate to detect any leaks or failures.

D. Each Antrim field or project application to operate under a vacuum, shall include a map and/or schematic showing the location of: wells; gas pipelines (including diameter, wall thickness, material, and grade); compressors, pumps or other devices; production facilities; pressure sensing or monitoring equipment; oxygen sensing or monitoring equipment; and meters.

IV. Operational Requirements

A. An operator operating a system under vacuum shall monitor oxygen levels at the first production facility immediately downstream of all wells operated under vacuum or at a point within the Antrim field or project downstream of all wells operated under vacuum. Operators shall establish procedures and take prompt remedial action if oxygen levels at the monitoring site are at or above 5 parts per million (ppm) for a period of 10 minutes.

B. Each well that may be operated under vacuum shall have the capability for pressure monitoring. Vacuum casing pressures shall be monitored and recorded on a monthly weekly basis.

C. For each well that is intended to be operated under vacuum, the wellhead, aboveground valves, fittings, connections, and pipe transitions shall be inspected for leaks immediately prior to commencing vacuum operations and at least four times per year.
during vacuum operations.

D. The gas pressure in the well shall be at or above atmospheric pressure before any work is performed that has the potential to introduce oxygen into the wellbore.

E. Any future pipelines or wells within the approved Antrim field or Project shall be designed and constructed to be suitable for vacuum operations.

V. Notification Requirements

A. After a project is approved to operate under vacuum, the operator shall file supplemental information to demonstrate continuing compliance with these requirements for any facility modifications affecting vacuum operations or additional wells that will be operated under vacuum within the Antrim field or project.

B. Operators of any Antrim field or project operating under vacuum shall file a notification prior to the addition of compressors, pumps, or other devices that will be added for the purpose of applying a vacuum or upon occurrence of pipeline failures relating to vacuum operations within the Antrim field or project, including the date, time, and location of the failure or incident.

C. In the event an operator wishes to cease vacuum operations on an Antrim field or project that has been granted approval, the operator shall file a statement in this docket notifying the Commission of the date that vacuum operations shall cease. This notification releases the operator of its obligation to meet the ongoing requirements for the Antrim field or project and associated wells.

VI. Annual Reporting Requirements

A. An operator of an Antrim field or project approved to operate under vacuum shall annually file a report by March 1st for the preceding year. For each Antrim field or project, the annual report shall contain: (1) all dates on which the oxygen level was measured at or above 5 ppm for a period of 10 minutes; (2) for the first 12 months of vacuum operations, an annual analysis of fuel consumption versus the estimated incremental production; and (3) the average monthly wellhead pressure for each well that was operated under vacuum.

B. A report shall be filed annually, if necessary, containing an updated map and/or schematic of the Antrim field or project including the information previously stated in the Application Verification and Required Documentation section.

C. Operators that operate multiple facilities may submit one report containing the necessary data for all facilities that they operate.
MICHIGAN DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS
PUBLIC SERVICE COMMISSION

ENTRY OF APPEARANCE IN AN ADMINISTRATIVE HEARING

This form is issued as provided for by 1939 PA 3, as amended, and by 1933 PA 254, as amended. The filing of this form, or an acceptable alternative, is necessary to ensure subsequent service of any hearing notices, Commission orders, and related hearing documents.

General Instructions:

Type or print legibly in ink. For assistance or clarification, please contact the Public Service Commission at (517) 284-8090.

Please Note: The Commission will provide electronic service of documents to all parties in this proceeding.

THIS APPEARANCE TO BE ENTERED IN ASSOCIATION WITH THE ADMINISTRATIVE HEARING:

Case / Company Name: Commission’s own Motion Docket No. U-16230

Please enter my appearance in the above-entitled matter on behalf of:

| 1. (Name) | Riverside Energy Michigan, LLC |
| 2. (Name) | |
| 3. (Name) | |
| 4. (Name) | |
| 5. (Name) | |
| 6. (Name) | |
| 7. (Name) | |

Name Michael G. Oliva
Address 124 W. Allegan, Suite 700
City Lansing State M
Zip 48933 Phone (517) 4822400
Email mgoliva@loomislaw.com
Date 04/03/2019
Signature Michael G. Oliva

☐ I am not an attorney
☐ I am an attorney whose:
Michigan Bar # is P. 29038
Bar # is: ( state )

Digitally signed by Michael G. Oliva
Date: 2019.04.03 12:16:32 -04'00'

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MICHIGAN DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS
PUBLIC SERVICE COMMISSION

ENTRY OF APPEARANCE IN AN ADMINISTRATIVE HEARING

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Case / Company Name: Commission's own Motion Docket No. U-16230

Please enter my appearance in the above-entitled matter on behalf of:

1. (Name)
   Riverside Energy Michigan, LLC

2. (Name)

3. (Name)

4. (Name)

5. (Name)

6. (Name)

7. (Name)

Name Mark A. Iafrate
Address 124 W. Allegan, Suite 700

City Lansing State MI
Zip 48933 Phone (517) 482-2400
Email majafrate@loomislaw.com
Date 04/03/2019

Signature: Mark A. Iafrate Digitally signed by Mark A. Iafrate

☐ I am not an attorney
☐ I am an attorney whose:
Michigan Bar # is P-83071
Bar # is: ______________________________
( state )

Save Form

EAH1 - 09/29/2016
STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter, on the Commission’s own motion, )
To consider the appropriate regulatory response )
To proposals by various producers of natural )
Gas from Antrim Shale Formation to operate their )
Wells under a vacuum. )

PROOF OF SERVICE

STATE OF MICHIGAN )
) ss.
INGHAM COUNTY )

Karen M. Shotwell, being duly sworn, deposes and says that on April 3, 2019, she served a copy of Riverside Energy Michigan, LLC’s Motion to Amend the October 27, 2015 Order Establishing Requirements for an Antrim Natural Gas Well, Pool, or Field to Operate Under a Vacuum and Appearances for Michael G. Oliva and Mark A. Iafrae upon the attached service lists by electronic mail.

Subscribed and sworn to before me on April 3, 2019.

Karen M. Shotwell

Jennifer L. Ottney

Jennifer L. Ottney
Ingham County, Michigan
Acting in Ingham County, Michigan
My Commission Expires: 10/02/22
### MPSC Case No. U-16230

**SERVICE LIST**

<table>
<thead>
<tr>
<th>Name</th>
<th>Firm</th>
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<tbody>
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<td>Hon. Mark Eyster</td>
<td>Administrative Law Judge</td>
<td>Michigan Public Service Commission</td>
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<td>Administrative Law Judge</td>
<td>Administrative Law Judge</td>
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<td>Michigan Dept. of Attorney General/PSD</td>
<td>7109 W. Saginaw Hwy.</td>
<td><a href="mailto:sattlers@michigan.gov">sattlers@michigan.gov</a></td>
</tr>
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</table>

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