



Natural Gas Exploration on Organic Operations

Guidance

This guidance document highlights PCO's policy regarding contamination from various areas of industry, including natural gas exploration and drilling. It also outlines the responsibilities of the producer and PCO regarding natural gas exploration and drilling on certified organic land.

NOP REGULATIONS AND PCO POLICY

UTILITY AND INDUSTRY CONTAMINATION POLICY

All land disturbed by industry may have to be removed from certification for at least three years, if at risk of contamination, and will need to be evaluated for contaminants prior to re-certification.

Examples of industry that may cause contamination and jeopardize certification include, but are not limited to:

- Small/Large Non-Coal Surface Mining operations, including concrete manufactures
- Surface/Sub-Surface Coal Mining Extraction operations
- ***Oil and Natural Gas Exploration, including seismic testing***
- Residential and Commercial Land Development Projects
- Highway/Road Construction Projects i.e.: paving, highway/road construction, bridge development
- Commercial/Governmental Manufacturing Facilities
- Utility construction and maintenance (i.e. telephone pole installation)
- Other major infrastructural changes unrelated to the organic operation

An on-site inspection may be needed to assess the impact to the organic operation, as well as verifying the risk and prevention of contamination, looking at factors such as adequate buffers from any disturbed sites or required monitoring. PCO will review the Organic System Plan and the Inspection Report, including specific conditions found at each site in order to determine eligibility.

PCO has determined that the process of exploratory seismic testing (where a charge or a series of charges are placed 20 feet below the surface) is not a threat to organic integrity in most cases.

ADDITIONAL INFORMATION

GUIDANCE FOR NATURAL GAS EXPLORATION AND DRILLING ON CERTIFIED ORGANIC FARMS

It is the producer's responsibility to submit an updated Organic System Plan to include:

- What activity is planned?
- When will the activity occur?
- What areas will be impacted by the activity? Update farm map to indicate which field(s) will be impacted by natural gas exploration and drilling. Field(s) where drill pad is located will be removed from certification.
- What steps will be taken to monitor this activity (including exploratory seismic testing) to ensure that organic integrity is preserved?
- Are you planning to conduct a water test? Testing should be comprehensive. Tier 1 tests are insufficient.

Testing labs should be certified and able to establish and maintain a clear chain of custody for test samples. Producers may obtain water tests from all ground and surface water sources to establish a baseline of information. After baseline water testing, it is recommended that two water tests per year be completed during drilling and up to one year after activity ceases.

- What is your method of preventing contamination from the area of activity? This could include a buffer area, sufficient fencing for livestock, etc. Fencing materials must be NOP compliant. If a spill or other contamination occurs, the affected land will be removed from certification for a minimum of 3 years.
- Will any input materials be used? Update Materials Used Form to list specific brand name and manufacturer information. Reclamation activities must be done with NOP compliant inputs (seed, fertility, etc.).

It is PCO's responsibility to:

- Review updated Organic System Plan.
- Conduct an on-site inspection, if needed.

The producer should have their approved Organic System Plan and processor requirements (if applicable) available to present to the gas company or contractor to establish a clear understanding of organic certification requirements and maintenance of organic integrity during activity.

As it is impossible to predict potential contamination occurrences, PCO reserves the right to issue non-compliances associated with gas drilling after approving the Organic System Plan.

WATER QUALITY

PCO recognizes the Safe Water Drinking Act, for public water supply, regarding disinfection (the use of chlorination/ozonation) of water for treatment against microbial contamination. PCO does not have a policy for water quality on organic farms, for either irrigation or livestock use. PCO refers to the applicable NOP standards for establishing quality water standards on individual farms as delineated on an individual farmer's organic system plan. The applicable parts of the standards are:

§205.200 "...Production practices implemented in accordance with this subpart must maintain or improve the natural resources of the operation, including soil and **water quality**...."

§205.238(a)(3) " The producer must establish and maintain preventive livestock health care practices, including: Establishment of appropriate housing, pasture conditions, and **sanitation practices** to minimize the occurrence and spread of diseases and parasites..."

§205.239(a)(1) "The producer of an organic livestock operation must establish and maintain year-round livestock living conditions which accommodate the health and natural behavior of animals, including: Year-round access for all animals to the outdoors, shade, shelter, exercise areas, fresh air, **clean water for drinking**, and direct sunlight, suitable to the species, its stage of life, the climate, and the environment..."

§205.272(a) "The handler of an organic handling operation must implement measures necessary to prevent the commingling of organic and nonorganic products and **protect organic products from contact with prohibited substances**."