



June 9, 2026

Re: Paradise at the Lake Phase 1 PWS
Plan
Approval
Well Site Approval
Drinking Water Program
Logan County
PWS ID: OH4652636
Package Number: DDAGW-6980

Kody Newland
Paradise at the Lake Phase 1 PWS
1934 E. Camelback Road Suite 120-611
Phoenix, Arizona 85016

Corrected Copy

Subject: Revised Well Site Approval for Well 1; WL55562; Community

Dear Kody Newland:

On May 4th, 2026, Robert Cramer met with your representative, James Schroeder of Peterman Associates, to review a well site for proposed Well 1 to serve Paradise at the Lake Phase 1 PWS. The proposed well site is located at 40°31'31.81" N, 83°51'45.74" W. A map of the site showing the proposed well(s) location is attached and is being included herein for documentation. The proposed well site complies with the requirements of the Ohio EPA in accordance with Ohio Administrative Code (OAC) Chapter 3745-9 and the proposed well site is hereby accepted subject to the following conditions.

1. The sanitary isolation radius is determined from the estimated average daily water demand of 20,800 gallons per day. Based upon this, the owner of the water supply shall maintain ownership or obtain an easement or lease of all land within a 154-foot radius of any permanent production well installed at this site in accordance with OAC Rule 3745-9-04. The final isolation radius will be established as a condition of the well's final plan approval.
2. The use of all land within this 154-foot isolation radius must conform to the requirements of the Ohio EPA. More specifically, this land shall be maintained such that no new potential sources of contamination are established within the isolation radius as determined under OAC Rule 3745-9-04. In addition, an inner management zone and drinking water source protection area will be identified for this well in the Source Water Assessment Report that will be prepared by Ohio EPA or the public water system. OAC Rule 3745-9-04 outlines additional restrictions on what can be located within the isolation radius and the drinking water source protection area.
3. Well construction must comply with all Ohio EPA Water Well Standards, OAC Rules 3745-9-01 through 3745-9-09. You can view these rules on the internet at <https://epa.ohio.gov/divisions-and-offices/drinking-and-ground-waters/regulations/effective-rules>.

The well may be drilled using the dry driven grout method. The well must be properly grouted in accordance with OAC Rule 3745-9-07, which requires that all annular spaces be completely filled with grout from the ground surface to the bottom of the annular space. All annular spaces shall be of sufficient size so that the grout can be properly placed per OAC Rule 3745-9-05).

4. Submit a copy of the Pumping Test Report conducted as required by OAC Rule 3745-9-09(B)(6) with detail engineering plans.

In accordance with OAC Rule 3745-9-09(B), a pumping test must be performed to determine the performance of the well. The pumping test is to be conducted at the time the well is drilled. The pumping test shall be conducted in accordance with the following requirements.

The pumping test shall be conducted in accordance with OAC Rule 3745-9-09(B)(4)(a) at a constant rate for a period of 24 hours either at the peak hourly demand (144 gpm) or at least 1.5 times the pump design rate, whichever is greater. If the well cannot sustain peak hourly demand, the pumping test shall be conducted at a minimum of 1.5 times the anticipated design pumping rate. The test may be conducted at a lower pumping rate in accordance with OAC Rule 3725-9-09(B)(4)(d) if the test is conducted at no less than 1.2 times the pump design rate and a demonstration is provided that supports the reasoning for a lower pumping rate.

OAC Rule 3745-9-09(B) should be consulted for additional requirements regarding the pumping test and pumping test reports.

A copy of the Pumping Test Report form or equivalent must be forwarded to this office. The Pumping Test Report form is contained in Ohio EPA Division of Drinking and Ground Waters "Guidelines for Design of Small Public Ground Water Systems," June 2023, Appendix E, available at <https://epa.ohio.gov/static/Portals/28/documents/engineering/greenbook.pdf>.

5. Collect the new well chemical samples at the end of the pumping test in accordance with OAC Rule 3745-9-09(C). Ensure the samples are analyzed at a laboratory certified by the State of Ohio and the sample results are submitted electronically to Ohio EPA. Notify Ohio EPA when the results are received. Ensure that Sample Monitoring Point (SMP) identifier **RS001** is used on the laboratory Sample Submission Report forms.
6. Detail plans prepared in accordance with OAC Chapter 3745-91 of well construction, upper terminal development, chlorination facilities, and any other treatment shall be approved by the Ohio EPA prior to placing the well and any associated treatment facilities into service. Instructions for plan submittal may be found on the Ohio EPA Division of Drinking and Ground Waters website under Engineering and Plan Approval. As a requirement of this detail plan approval, it will be necessary to submit the following, along with a copy of the plans:
 - a. A copy of any deed or other document showing the ownership and sanitary control of the prescribed isolation area as required by OAC Rule 3745-9-04.

- b. A copy of the well log that shall be filed with the Ohio Department of Natural Resources (ODNR) as required by Section 1521.05 of the Ohio Revised Code.
 - c. The well must be disinfected and bacteriologically tested in accordance with OAC Rule 3745-9-08. Results from two consecutive total coliform samples collected from the well at least 30 minutes apart and analyzed in an Ohio EPA certified lab must be provided with the detail plans.
 - d. Any applicable specifications required for Detail Plan Approval in accordance with OAC Rule 3745-91-04.
 - e. The Plan Approval Fees which is equal to \$150 plus 0.35% of the estimated water project cost, made payable to the Treasurer of the State of Ohio [$\$150.00 + (.0035 \times \text{estimated water project cost})$]. In addition, if the well is part of a public water system requiring a license under Chapter 6109 of the Ohio Revised Code, include a \$20 Well Log Fee in the fee calculation. Ohio EPA collects this fee for ODNR in accordance with Section 1521.05(G) of the Ohio Revised Code.
 - f. OAC Rule 3745-87-02 requires each new water system proposing to provide water to the public to include a written description of their asset management program (AMP) with the submission of the general or detail plans required under OAC Chapter 3745-91. The AMP must demonstrate the technical, managerial and financial capability of the system and be accepted by Ohio EPA prior to construction.
7. Additional treatment or another water source may be required depending on the results of the chemical analysis. Please note that if the proposed water system will include treatment then the corresponding waste stream(s) will need to be disposed of properly. You will need to contact the Division of Surface Water at (614) 644-2001 to discuss waste disposal methods.

This site approval shall become void two years from the date of this letter unless a formal plan approval has been issued.

If a Water Supply Revolving Loan Account (WSRLA) loan is desired, it will be necessary to comply with the requirements of Ohio Revised Code Section 6109.22. If compliance with WSRLA requirements necessitates any revisions to the plans as herein approved, a resubmittal and approval of the plans will be required before construction.

Should there be any questions regarding the requirements, meaning, or interpretation of any of the above which we may clarify, please contact the Division of Drinking and Ground Waters, Southwest District Office, Ohio Environmental Protection Agency.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of

the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Treasurer of the State of Ohio", which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
30 East Broad Street, 4th Floor
Columbus, OH 43215

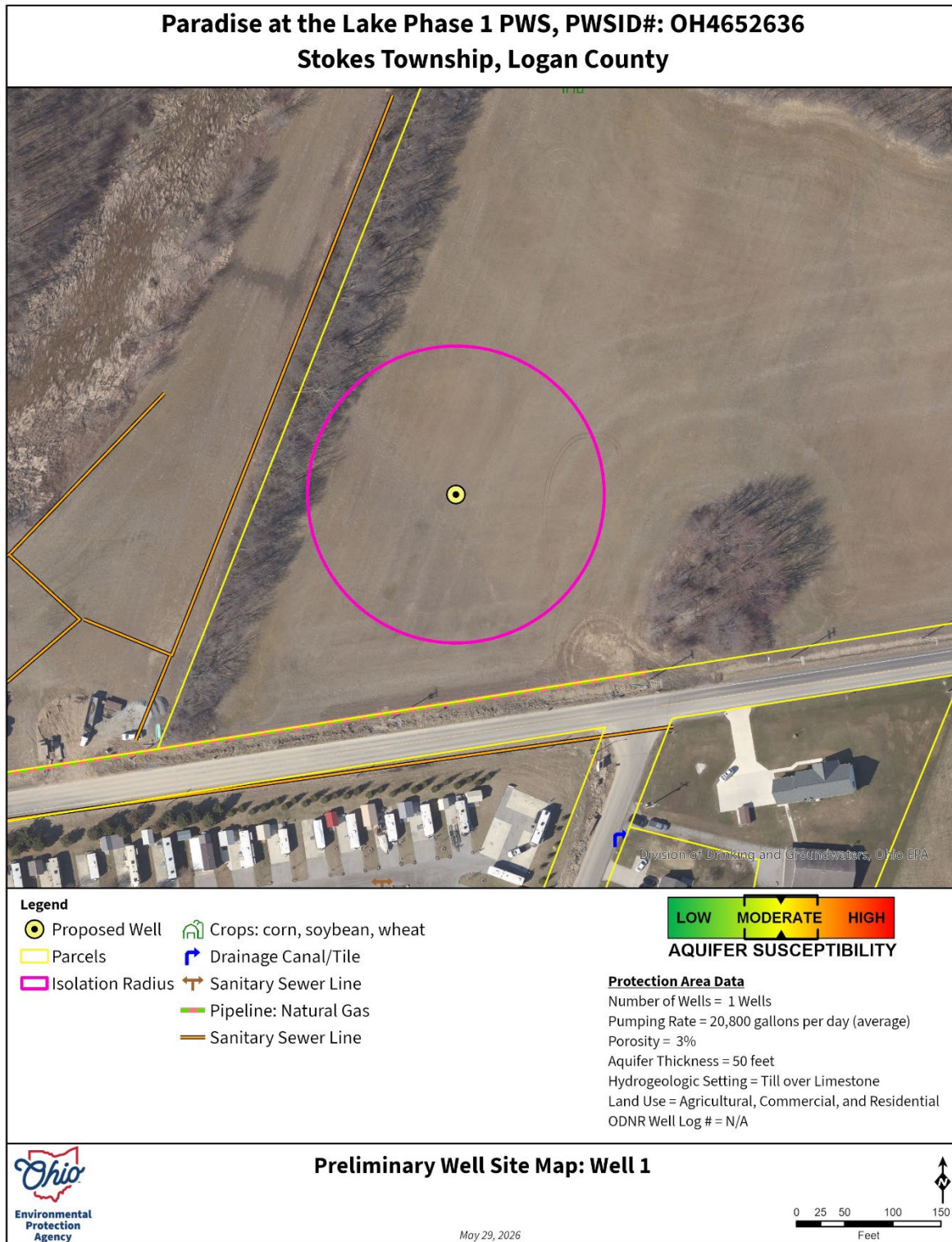
Sincerely,

A handwritten signature in black ink, appearing to read 'J. Logue', with a stylized flourish at the end.

John Logue
Director

Enclosures: Well Site Map, Well Criteria Fact Sheet, Source Water Protection in Ohio Fact Sheet

cc: Logan County Health Department
James Schroeder, Peterman Associates
Davis Operating Services LLC
Brandon Turner, Environmental Specialist, DDAGW-SWDO
Mariano Haensel, Environmental Supervisor, DDAGW-SWDO
Jeff Davidson, Environmental Manager, DDAGW-SWDO
Katie Moore, Environmental Supervisor, DDAGW-SWDO





DIVISION OF DRINKING and GROUND WATERS
CRITERIA APPLICABLE TO ALL PUBLIC WATER SYSTEM WELLS

The following criteria required by OAC 3745-9-05 are applicable to all public water system wells:

1. A minimum of 25 feet of solid, watertight casing must extend below the ground surface.
2. The minimum casing diameter shall be five inches and sized to allow the well to produce water that is adequate for the intended use, and to allow for the installation and maintenance of the well and related pumping equipment.
3. Steel or thermoplastic (i.e., PVC) well casing shall be used and shall conform to the minimum thickness, pipe specification and joint specifications described in OAC 3745-9-05.
4. Thermoplastic well casing shall not be installed where potential or known contaminants may degrade or permeate plastic and must not be driven.
5. All annular spaces shall be of sufficient size so that the grout can be properly placed.
6. The well cap/seal shall be a watertight, secured with screws or other appropriate connections, and vented to the atmosphere. Well caps, pitless adapter or pitless unit, must conform with "Water System Council Pitless Adapter Standard PAS-97, Performance Standards for Sanitary Water Well Pitless Adapters, Pitless Units, and Watertight Well Caps" (2012).
7. A vent shall be provided on all well caps and seals except for those used on deep well single pipe packer jet installations, or flowing wells where the flow rate is greater than the pumping rate of the permanent pump. A well vent shall be self-draining, screened with a noncorroding mesh screen of fifteen to thirty mesh, pointed downward at or above the top of the casing or pitless unit. A vent shall terminate not less than twelve inches above ground surface, and at least twelve inches above the well house floor or concrete apron surface. The well vent shall extend a minimum of three feet above the one-hundred-year floodplain elevation, or highest known flood elevation, whichever is higher.
8. The pitless adapter or pitless unit shall be lead free; conform with "Water System Council Pitless Adapter Standard PAS-97, Performance Standards and Recommended Installation Procedures for Sanitary Water Well Pitless Adapters, Pitless Units, and Well Caps," (2012) or with an alternative standard acceptable to the director; and if welded, have connections to steel well casing made watertight in accordance with welding procedures in the "American Welding Society Structural Welding Code, AWS D1.1/D1.M:2002" (2002).

9. OAC 3745-9-05 requires that the top of the casing extend at least three feet above the 100-year flood or the highest known flood elevation, whichever is higher.
10. The casing may extend 8 inches above finished grade for wells that were installed prior to May 1, 2003 per OAC 3745-9-01(H), otherwise the casing shall under no circumstance extend less than 12 inches above finished grade.
11. Defective, visibly damaged or reject pipe shall not be used as casing or liner pipe for wells.
12. Casing shall extend continuously, at a minimum, either to the top of the aquifer or to the top of the non-water bearing consolidated formations above an aquifer.
13. The casing and borehole shall be sufficiently straight and vertical to allow for normal installation and operation of the pump and uniform placement of grout.
14. Well screens shall be installed where the geological formations are unconsolidated or incompetent.
15. The well shall be constructed in accordance with the requirements for specific geologic conditions in 3745-9-06 of the Administrative Code.

The following criteria required by OAC 3745-9-07 and OAC 3745-9-09 are applicable to all public water system wells:

1. The well must be properly grouted, which requires that all annular spaces be completely filled with grout from the ground surface to the bottom of the annular space.
2. The only accepted grout is bentonite and cement.
3. Mechanical development techniques shall be used to develop the well upon completion and shall continue until turbidity or sand content in the well is minimal. Chemical development may also be utilized with prior consultation with the District Office.

Source Water Protection in Ohio

Ohio's Source Water Protection Program helps public water suppliers protect drinking water sources, such as streams and aquifers, from contamination. It addresses the more than 4,500 public water systems in Ohio.

The source water protection program has two phases. The first is collecting information about the source water — the assessment phase. There are three steps to an assessment: delineating the protection area; identifying the potential contaminant sources in that area; and determining the susceptibility of the aquifer. Some public water systems had completed their assessments under the Wellhead Protection Program. In 2000, Ohio EPA staff began to assess the remaining systems. By 2006, nearly all public water systems had complete drinking water source assessments. New systems continue to be assessed as they come on-line. The second phase is developing and implementing a local drinking water source protection plan. This effort is led by the public water system owner/operator, with assistance from groups such as local emergency responders, educators, and watershed groups, as well as business owners and residents living in the protection area.

Where did this program come from?

The federal Safe Drinking Water Act amendments of 1986 established the Wellhead Protection Program, which required states to administer a source water protection program for their ground water-based public water systems. In 1996, the Safe Drinking Water Act was amended again to provide states with funding to complete source water assessments for public water systems. At that time, the program was extended to include surface water systems and was renamed Source Water Assessment and Protection (SWAP). Ohio EPA's Division of Drinking and Ground Waters administers the program in Ohio following program approval by U.S. EPA in 1999.

What does a protection area do for my community or public water system?

Other environmental programs within Ohio EPA and other agencies have regulations authorizing them to restrict certain activities within a designated "protection area." For example, new landfills, and manure storage sites at large concentrated animal facilities may not be sited in drinking water source protection areas for ground water systems.

Most public water suppliers welcome these regulations because they help divert potentially high-risk facilities away from intakes and wellfields to less sensitive areas. Fact sheets are available at [Ohio EPA's SWAP Program Website](#) (under the "Publications" tab) for the following restricted activities in source water protection areas: siting landfills, land-applying biosolids and wastewater, and storing manure at concentrated animal feeding facilities (CAFOs).



Examples of potential sources of contamination to drinking water clockwise from the upper left: pipe discharging contaminated water; tanker truck accident and spill; flooded farmland, resulting in fertilizer runoff; road salt; septic tank cleanout; dumping chemicals down a storm drain; drums of hazardous materials; pigs urinating in a stream; mining; and landfills.

Source Water Protection in Ohio

Who is the audience for a drinking water source assessment report?

The main audience for an assessment report is the public water system owner or operator who needs information that can help them protect drinking water at the source. The secondary audience is the individuals in watershed groups and other organizations who could partner with the public water system to help implement protective strategies. Finally, the reports are meant for the general public. Because of this, the reports are written in non-technical language.

What is a susceptibility analysis?

This is an evaluation of the likelihood that a drinking water source could become contaminated. In Ohio, all surface waters are considered to have a high susceptibility to contamination. Aquifers that supply ground water to a public water system are assigned a high, moderate, or low susceptibility, based on the local geology, the numbers and types of potential contaminant sources and water quality.



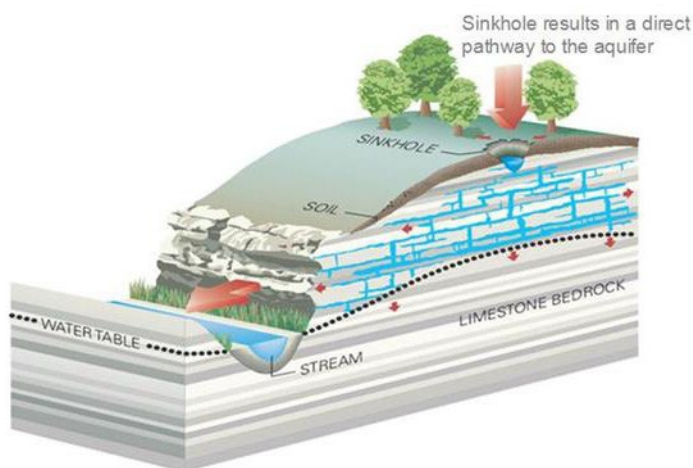
Drinking water source protection area showing potential sources of contamination.

Why perform a susceptibility analysis?

A susceptibility analysis is required by the 1996 amendments to the Safe Drinking Water Act. Its purpose is to prioritize systems for source water protection efforts. A public water system whose drinking water source is highly susceptible to contamination needs to commit a greater level of effort to protect it from contaminant sources. They also may have a higher priority for any funding that may be available for these efforts.

Is a susceptibility analysis the same as a vulnerability assessment?

No. Vulnerability assessments are evaluations of the likelihood that a public water system's infrastructure — the plant, water lines, etc. — could be compromised by sabotage. Public water suppliers are required by the Public Health Security and Bioterrorism Preparedness and Response Act of 2002 to complete a vulnerability assessment of their public water system.



Block diagram showing karst geology. These settings are typically susceptible to contamination because of little natural protection between the ground surface and the aquifer. Graphic used with permission from the Columbus Dispatch. Slightly modified.

What does it mean to have a high susceptibility?

In most cases, it means your source water has a relatively high likelihood of contamination, due to lack of natural protection and/or a high number of contaminant sources. It does not mean that the source water will become contaminated, and should not be interpreted as a cause for alarm. It should instead be cause for action to protect the source water to the fullest possible extent.

In those cases where ground water quality is known to be affected by human activities (for example, high nitrates or the presence of solvents), the source water has been rated highly susceptible even if the aquifer may not otherwise seem susceptible to contamination.

Source Water Protection in Ohio

Can the susceptibility rating for my water source ever change?

In Ohio, all surface waters are considered to have a high susceptibility to contamination, and this will not change. In some cases, a ground water source has been given a high susceptibility because of numerous significant potential contaminant sources. If the risk from these sources is minimized, the susceptibility could be lowered. Similarly, a ground water system's susceptibility may be raised (assuming it is not already high) if significant potential contaminant sources are subsequently sited in the protection area or if water quality impacts are detected. However, susceptibility analysis for ground water systems is based primarily on aquifer characteristics, which are relatively unchanging.

What is a drinking water source protection plan?

A drinking water source protection plan is locally designed and implemented to protect the source of drinking water from contamination at the source. The focus and scope of a protection plan is dependent on the size and type of water system.

For municipal ground water systems (serving a political jurisdiction) and investor-owned water companies:

- A typical plan addresses: (1) educating residents and decision-makers about protecting the source water; (2) including source water concerns in the system's contingency plan; and (3) strategies to reduce the risk posed by specific potential contaminant sources. Monitoring of the raw water may be an additional element. The protection plan may be implemented as a completely voluntary effort, or through a local ordinance that would give the jurisdiction the ability to enforce certain measures. Ohio EPA has developed a template for small community systems (serving 5,000 or less), to facilitate the completion of a written document. Once complete, the protection plan should be sent to the appropriate Ohio EPA district office for review and endorsement.
- A guidance document for completing a protection plan is available from Ohio EPA, electronically and in hard copy. A CD containing additional material designed to help public water system operators and administrators develop a protection plan is also available upon request.

For non-municipal ground water systems:

- When Ohio EPA staff complete a system's assessment report, they attach a checklist. The owner/operator is asked to check off strategies that they intend to implement or are already implementing, and return the checklist to Ohio EPA. This checklist then becomes the system's protection plan.

How can I see the assessment report for a water system?

These reports can be requested directly from Ohio EPA by making a public records request at: epa.ohio.gov/help-center/contact-us/forms/file-review-checklist-form. You may also request a copy or permission to view reports directly from the public water system.

Are reports written for systems that purchase their water?

Ohio EPA completes assessment reports only for those systems that actually pump water from an aquifer or a surface water body. Any public water system that pumps its own water and then sells it to other public water systems should make copies of the assessment report available to the purchasing systems.



Source Water Protection in Ohio

How can I get involved in protecting my drinking water source?

As a homeowner, we encourage you to learn about things that can be done around your home to help protect your drinking water resources. These include:

- limiting the use of pesticides, fertilizers, and other lawn chemicals;
- not pouring chemicals down the drain;
- recycling used motor oil and antifreeze;
- cleaning up animal waste; and having septic systems inspected regularly.

For more suggestions about how you can help, go to epa.gov/sourcewaterprotection/how-can-you-help-protect-source-water.

You may also consider contacting your public water supplier to find out if they have a drinking water source protection plan in place or being developed. If not, you can offer your assistance in organizing a protection team in your community. Much of the effort involved is organizational and anyone with energy and organizational skills can be a valuable resource. Ohio EPA staff members are also available to offer guidance and technical assistance.



Photo Courtesy of WSU Clark Co. Extension.



Source Water is a shared resource. Do your part to protect it.