

**OFFICE OF THE OHIO LEGISLATIVE INSPECTOR GENERAL**

**JOINT LEGISLATIVE ETHICS COMMITTEE**

Washington County for Safe Drinking Water : :

P.O. Box 1127 : :

Marietta, Ohio 45750 : :

Complainant : :

-vs- : :

Brian M. Chavez : :

Senator, Ohio 30<sup>th</sup> District : :

**COMPLAINT AND SWORN AFFIDAVIT**

**I. Violation of Ohio's ethics law on two fronts: (A) Use of the authority or influence of office to seek personal pecuniary benefit and (B) Failure to disclose interests in five limited liability companies on two financial disclosure statements.**

Ohio's ethics law prohibits a public official from using or authorizing the use of his public position to obtain a benefit for the official, or for anyone else with whom the official is closely connected. The law also prohibits public officials from filing false or incomplete financial disclosure statements.

The Ohio State Senate is considered a public agency because it is a governmental body established to perform state functions, including creating laws. A public official may not act on a matter before his or her public agency if the matter definitely and directly affects: (1) the official or employee; (2) one of the official's or employee's close family members; or (3) one of the official's or employee's business associates. "No public official or employee shall use or authorize the use of the authority or influence of office or employment to secure anything of value or the promise or offer of anything of value that is of such a character as to manifest a substantial improper influence upon the public official or employee with respect to that person's duties." *See Exhibit 1*: Ohio Revised Code Section 102.03.

Publicly available records reveal that Senator Brian M. Chavez is using his public position to seek personal pecuniary benefit in violation of Ohio Revised Code Section 102.03 through his support

and advocacy for Senate Bill 219, which aims to revise laws governing oil and gas wells, including laws governing the orphan well plugging program and injection wells.

Senator Chavez has filed two incomplete financial disclosure statements for the years 2023 and 2024. *See Exhibit 2:* Senator Brian Chavez 2023 Financial Disclosure Statement. *See Exhibit 3:* Senator Brian Chavez 2024 Financial Disclosure Statement. In both filings, Senator Chavez fails to disclose five limited liability companies where publicly available records and other evidence demonstrate that he and/or a close family member have interests.

**A. Senator Chavez serves as the Chair of the Ohio Senate Energy Committee and holds the power to advance legislation that definitely and directly affects his and/or a close family member's personal pecuniary interest.**

Senator Chavez serves in the Ohio Senate as Chair of the Energy Committee and Vice-Chair of the Finance Committee. As Chairman of the Energy Committee, he has significant power, including setting the committee's agenda, scheduling hearings, and controlling the flow of legislation. He may refer energy-related bills to subcommittees, run committee meetings, and has the authority to subpoena witnesses and compel the production of documents, with the authorization of the Senate President.

As Chair of the Energy Committee, Senator Chavez influences the budget, oversight, and policies of the Ohio Department of Natural Resources (“ODNR”). In recent months, Senator Chavez has used his position to fast-track Senate Bill 219, titled: Revise the Law Governing Oil and Gas Wells. *See Exhibit 4:* Ohio Legislative Service Commission Fiscal Note and Local Impact Statement of SB 219, both versions: As Introduced and As Passed by the Senate.

Senator Chavez co-sponsored Senate Bill 219 and touts the bill by claiming that it “will not only protect health, human safety and the environment, but will also enable job creation and investment in our state, all while ensuring that Ohio can be energy-dominant for decades to come.” *See Exhibit 5:* “Chavez Supports Historic Oil and Gas Modernization.” After the fast-tracking of Senate Bill 219, the Senate passed it on November 19, 2025. What Senator Chavez has failed to reveal to the media about Senate Bill 219 is that, if it becomes law, he and his close family members’ businesses could have increased opportunities to make more money with less risk.

As introduced, Senate Bill 219 would have made approximately \$150,000,000 in previously inaccessible funds from the State’s Oil and Gas Well Fund available for capping orphan wells. *See Exhibit 4* at page 2. In both his 2023 and his 2024 financial disclosure statements, Senator Chavez reveals his interest in “Chavez Well Service LLC,” and he is listed as an agent of the company in a 2019 Secretary of State filing. *See Exhibit 6:* Secretary of State Subsequent Agent Appointment for Chavez Well Service LLC.

Since Brian Chavez became Senator Chavez, Chavez Well Service has bid on five orphan well contracts. On December 20, 2023, just two weeks after Senator Chavez was appointed to Senator Hoagland’s unexpired term, proposals were due for the “Washington 14 Orphan Well Project.” Chavez Well Service LLC was awarded the \$208,105 contract. On May 30, 2024, bids closed on the Washington 19 Orphan Well Project, and Chavez Well Service submitted a losing bid of \$190,205. Also on May 30, 2024, bids were due for the Monroe 6 Orphan Well Project. Chavez Well Service submitted a losing bid of \$999,292.50. On September 12, 2024, contractor proposals were due for the Washington 21 Orphan Well Project. Chavez Well Service filed a losing bid for \$159,418. On May 5, 2025, contractor proposals

were due for the Washington 18F Orphan Well Project. Chavez Well Service filed a losing bid of \$1,503,335.05. **See Exhibit 7** Chavez Well Service Orphan Well Program bids.

Senate Bill 219 provides that fees collected for injection wells shall be sent back to the county in which they are collected. **See Exhibit 8** SB 219 at page 64, lines 1851 to 1857.

<https://legiscan.com/OH/text/SB219/id/3285191> This is a diversion of regulatory fees to incentivize the acceptance of waste products. The result will be financially endearing injection well companies with local politicians. Under existing law, fees are collected on just the first 500,000 barrels of injectate per well. Up to \$100,000 in fees could be collected for each 5,000-barrel-a-day well near Marietta if all those barrels are taxed for out-of-state brine. Should the three new wells that DeepRock Disposal Solutions LLC is applying for become operational, the potential annual revenue for the Washington County general fund from DeepRock injection wells could be as much as \$700,000 minus 3% for DeepRock's collections reimbursement, or \$679,000. This diverted money from injection well fees would have previously been used for ODNR environmental protection and oversight. **See Exhibit 8** link to SB 219 at page 64, lines 1851 to 1857.

Senate Bill 219 includes no increase in the fees paid per barrel of injectate. Fees for in-state waste will remain where they have been since 1991, when the 118<sup>th</sup> General Assembly set the rate at five cents per barrel. The fee will remain at 20 cents per barrel for out-of-state injectate. With no adjustment for inflation, Ohio is an increasingly attractive location for the oil and gas industry to offload its waste, meaning more potential profit for Ohio injection well businesses and more risk for regular Ohioans. **See Exhibit 8** link to SB 219 at page 63, lines 1810 to 1821.

Senate Bill 219 also would eliminate the mandatory requirement for road maintenance and safe-use agreements for horizontal drilling. "As a result, local governments and the Ohio Department of Transportation may no longer be guaranteed compensation for road wear or damage caused by overweight loads." **See Exhibit 4** at page 2. Additionally, by amending Ohio Revised Code Section 1509.06, Senate Bill 219 will eliminate ODNR's discretion to deny expedited drilling permit reviews up to ten times a year per owner. **See Exhibit 4** at page 2.

Showing still more favoritism to injection well companies, Senate Bill 219 sets priorities in determining which orphaned oil and gas wells must be plugged first. The bill does not give priority to plugging the orphaned wells that are the most problematic or dangerous, but instead gives priority to the wells closest to active injection wells. The bill states, in pertinent part: "when determining the priority of plugging wells or restoring land surfaces at orphaned well sites, the chief shall ensure that first priority is given to orphaned wells located in close proximity, as determined by the chief, to one or more active injection wells." **See Exhibit 8** at page 42, lines 1212 to 1216.

Orphaned, idled, and even active oil and gas production wells situated in proximity to injection wells have been documented in Southeast Ohio to act as conduits for the migration, or leaking, of injected brine wastewater from containment zones to the surface. DeepRock injection wells in Noble County and other injection wells in Washington County have migrated waste fluids to production wells, sometimes greater than five miles away from the injection zone. So far, ODNR has failed to conduct a thorough, long-term, and systemic analysis of the brine migration problem in Southeast Ohio. Instead, ODNR continues to rapidly issue permits for new injection wells without consideration of the heightened risks posed by the proximity of some injection wells to municipal aquifers. **See Exhibit 8A** Marietta City Council Resolution No. 81, Moratorium Resolution. Senate Bill 219's prioritization of the

plugging of orphaned wells in proximity to injection wells is not a solution, instead, it is an effort to sweep the problem under the rug.

By way of summary, should Senate Bill 219 become law as currently passed by the Ohio Senate, the following benefits will likely accrue to Senator's Chavez's personal and/or family interests: (1) local governments will be incentivized to accept fracking waste because money that would have originally gone to ODNR for operations will instead be sent to county general funds; (2) there remains no inflation related tax increase per barrel of injectate; (3) ODNR discretion to deny expedited drilling permit reviews, including wastewater injection wells, is mostly eliminated; and (4) the orphaned and abandoned wells closest to active injection wells that need to be plugged will be given priority over all other orphaned wells - benefiting injection well operators.

Should Senate Bill 219 become law, the injection well industry will be set to make more money with less oversight. Consequently, Senator Chavez, with both his disclosed and undisclosed interests, could stand to profit from the provisions in Senate Bill 219. Senator Chavez should have recused himself from all involvement in Senate Bill 219. Instead, he has co-sponsored the bill, fast-tracked it, and publicly advocated for it.

**B. Publicly available information reveals that Senator Chavez's 2023 and 2024 financial disclosure statements fail to disclose his and/or immediate family members' interests in five limited liability companies.**

Financial disclosures assist the public and the Office of the Legislative Inspector General in monitoring a public official's potential conflicts of interest. Disclosure forms must be accurately and completely filled out. Senator Chavez was neither accurate nor complete in his submission of his ethics forms. Both direct and circumstantial evidence reveal that Senator Chavez failed to disclose the following five active LLCs for which he and/or a close family member have demonstrable interests:

1	Heinrich Property LLC	Status: Active in OH since 2007
2	Horizon Partners Investments LLC	Status: Active in OH since 2015
3	Funds Protection Investment LLC	Status: Active in OH since 2016
4	Condevco Operating LLC	Status: Active in OH since 2018
5	DeepRock Disposal Solutions LLC	Status: Active in OH since 2017

Brian Chavez met Christyann Heinrich when they were both employed at Intel. They were married, and in 2008, moved to Marietta, Ohio, to assume leadership roles in the Heinrich family oil and gas business. *See Exhibit 9: Legacies Live Forever: The Heinrich Family.*

<https://www.mcfohio.org/news/legacies-live-forever-the-heinrich-family> The Marietta Area Chamber of Commerce honored the couple with its Business Leaders of the Year award in 2017. *See Exhibit 10: Senator Brian M. Chavez Biography | Ohio Senate.*

<https://www.ohiosenate.gov/members/brian-m-chavez/biography>

The same year that the Washington County Chamber of Commerce honored Brian and Christyann Chavez as Business Leaders of the Year, DeepRock Disposal Solutions LLC was created and emerged with over seven million dollars in assets salvaged from a 2016 Washington County foreclosure case. *See Exhibit 11* Washington County, Ohio, Common Pleas Court 16 FR 161 Complaint.

Many of the assets purchased out of foreclosure are situated on property held by Heinrich Property LLC. *See Exhibit 12* Heinrich Property LLC parcel ownership list and highlighted GIS map image of parcels on which the three Career Center injection wells, Heinrich Units No. 1 and No. 2, and Vocational School Unit No. 2, are located. Heinrich Property LLC is an active entity. It is not listed on either Senator Chavez's 2023 or his 2024 financial disclosure forms. *See Exhibit 13* Heinrich Property LLC Articles of Organization.

The foreclosure lawsuit was filed by TCFII Westfall LLC against Water Energy Services, LLC ("WES") and 28 other defendants. The failure of WES to pay invoices resulted in the filing of mechanics liens and, eventually, the 2016 foreclosure action. Between June and December of 2015, the plaintiff's predecessor in interest, Westfall Builders, expended \$1,743,563 building an injection well offloading facility and installing a pipeline serving three injection wells situated on Heinrich Property LLC's parcels surrounding the Washington County Career Center.

Records show that the assets of WES came out of foreclosure after an "Asset Purchase Agreement" was signed by the buyer, Funds Protection Investment LLC of Reno, Ohio. Dean Grose signed as a buyer under Comtech Industries, and Christyann Chavez signed for the buyer Funds Protection Investment. *See Exhibit 14* Washington County Common Pleas Court 16 FR 161 Asset Purchase Agreement. The Asset Purchase Agreement was for a total of \$7,146,194 and resulted in the transfer of WES assets to Funds Protection Investment LLC, free and clear of liens. This transfer included well pad sites, equipment, land, facilities, and pipelines. *See Exhibit 15* Washington County Common Pleas Court 16 FR 161 Bill of Sale Listing Acquired Assets.

Funds Protection Investment LLC was created on April 29, 2016, presumably, for the purpose of purchasing the assets of WES out of foreclosure. *See Exhibit 16* Funds Protection Investment LLC Articles of Organization. Funds Protection Investment is an active Ohio LLC and it was not listed on financial disclosure forms, even though Christyann Chavez signed as a buyer for Funds Protection Investment LLC, under the interest of Heinrich Production. Heinrich Production is listed. The contact information for the buyer, Funds Protection Investment LLC was listed as P.O. Box 305 Reno, Ohio 46733, with emails christy@condevco.net and deang@comtechindustriesinc.com.

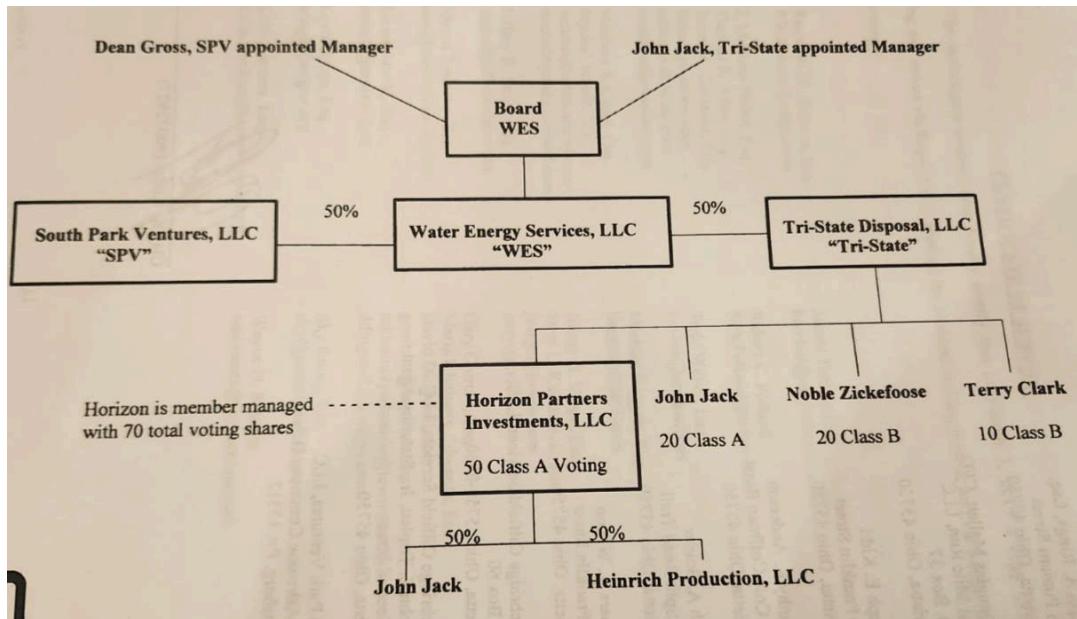
On January 5, 2017, the Articles of Organization for DeepRock Disposal Solutions LLC were filed. *See Exhibit 17* DeepRock Disposal Solutions LLC Articles of Organization. Nine days later, effective January 11, 2017, the court-appointed receiver assigned the assets of WES through Funds Protection Investment to DeepRock Disposal Solutions LLC. *See Exhibit 18* Washington County Common Pleas Case 17OT163, Chavez Affidavit: Assignment and Assumption of Asset Purchase Agreement.

On March 7, 2017, ODNR received an Authority and Organization Form, Form 9, from DeepRock Disposal Solutions LLC. Christyann Chavez signed the form as an authorized agent under the title of member, and her email was once again listed as christy@condevco.net. On March 20, 2017, ODNR addressed a letter to Christyann Chavez informing her that she had been assigned Owner Number 9896. *See Exhibit 18A* ODNR Owner Number 9896: DeepRock Disposal Solutions LLC, all Form 9 (Authority and Organization Form) filings from March 7, 2017 to present. *See also* Exhibit 48 showing Owner Number 9896 on current ODNR injection well permit applications.

On December 7, 2018, Christyann Chavez signed the Ohio Domestic For Profit LLC Articles of Organization for Condevco Operating LLC, as a “member, manager, or other representative.” *See Exhibit 19* Condevco Operating LLC Articles of Organization. The disclosure statements from 2023 and 2024 fail to disclose Condevco Operating LLC. The disclosures do list a similarly named Condevco, Inc. which was formed on January 19, 1988, by Carl Heinrich, Christyann Chavez’s father.

Subsequently, on May 17, 2019, six months after the non-disclosed Condevco Operating LLC was formed, Christyann Chavez was appointed as an authorized representative for Condevco, Inc. *See Exhibit 20* Condevco, Inc. Secretary of State filing.

An ownership chart found at Exhibit A of a Washington County Common Pleas Court Case Number 17OT30 pleading titled “Memorandum in Opposition to DeepRock Disposal Solutions LLC’s Motion for Release of Property” shows the ownership interest of WES. Fifty percent of WES is listed as belonging to South Park Ventures LLC, a Pennsylvania LLC. The other 50% interest went to Tri-State Disposal interest holders, of which Horizon Partners Investments held 50 Class A Voting shares, and of those shares, Heinrich Production LLC held 50%. *See Exhibit 21* Water Energy Services Ownership Diagram.



Horizon Partners Investments is shown in the diagram to have had an ownership interest in WES. In a document titled “Memorandum of Sublease Agreements,” Christyann Chavez signs for Horizon Partners Investments LLC as “its Authorized Agent.” *See Exhibit 22* Memorandum of Sublease Agreements on Career Center Wells, Washington County Common Pleas Court Case Number 17OT30; *See Exhibit 23* Quitclaim Assignment of Class II Injection Sublease Agreements signed by Christyann Chavez for both Heinrich Production and Horizon Partners Investments. *See also Exhibit 24* Articles of Organization for Horizon Partners Investments LLC. Despite Christyann Chavez signing as an authorized agent for Horizon Partners Investments LLC, the active entity is not listed on either of Senator Chavez’s 2023 or 2024 financial disclosure forms.

On July 14, 2017, DeepRock Disposal Solutions LLC filed Washington County Case # 17OT163. The case introductory statement reads at paragraph 1: “DeepRock is the successor in interest to all assets of Water Energy Services LLC (“WES”) a company that built and operated a wastewater disposal operation in Marietta, Ohio. Among the assets of WES acquired by DeepRock was a pipeline for the transport of wastewater from an unloading facility to disposal wells, along with all the rights of way and easements associated with the pipeline.” **See Exhibit 25** Affidavit of Christyann Chavez.

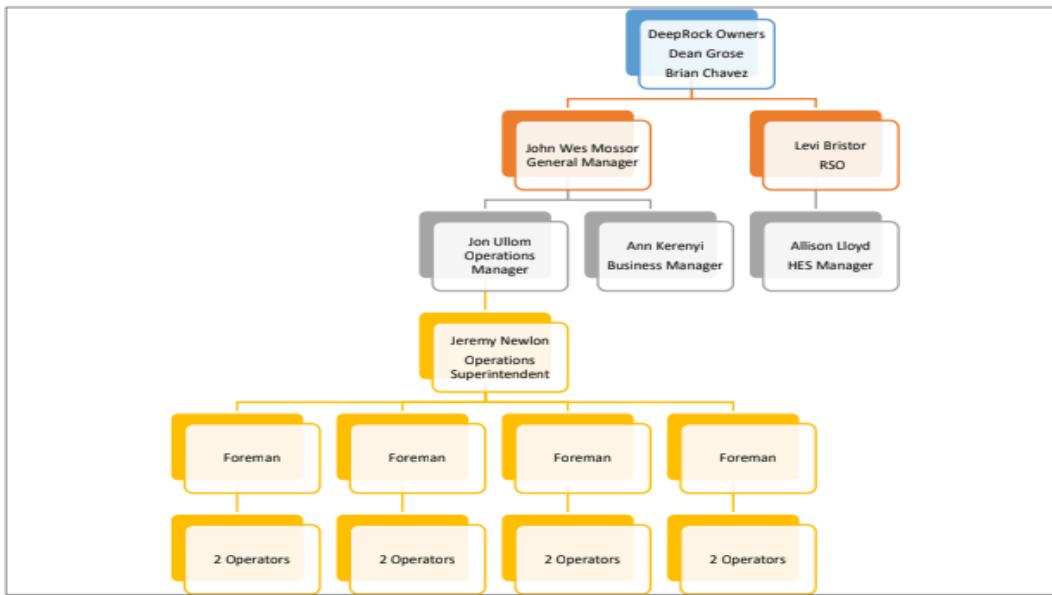
The first-named defendant in that lawsuit, Forte’ Productions, sent a May 23, 2017, letter addressed to Christy Chavez and Wes Mosser. The letter explained that DeepRock’s pipeline was trespassing on property where there were no easements. Subsequent pleadings reveal that WES built a pipeline across lands for which it had no recorded easement, and DeepRock argued for “permit[ting] an easement by estoppel.” The case made it to the Ohio Fourth District Court of Appeals, and the Ohio Supreme Court eventually declined to accept jurisdiction. **See Exhibit 26:** Forte’ Productions Letter.

The Memorandum in Support of Jurisdiction of Plaintiff-Appellant DeepRock Disposal Solution in Fourth Appellate District Appeals Case # 20-CA-15 included, at page 8, a reference to “DeepRock’s Merit Brief” and a “Chavez Affidavit.” The Chavez affidavit was filed on July 22, 2020, as part of the DeepRock Merit Brief. In the affidavit, Christyann Chavez attests to details regarding the construction of the subject pipeline, and she states: “I have reviewed, and am familiar with the books and records of DeepRock Disposal Solutions LLC as it relates to this case.” The exhibits to her affidavit include the Asset Purchase Agreement between Water Energy Services and Funds Protection Investment, the Bill of Sale from Water Energy Services to DeepRock Disposal Solutions LLC, the Assignment and Assumption of Asset Purchase Agreement, and a letter from Forte’ Productions to Deep Rock Disposal Solutions: Attn: Christy Chavez and Wes Mosser.

On May 16, 2025, DeepRock Disposal Solutions LLC resubmitted its original February 6, 2025, “Oil and Gas Waste Facility Permit Application.” The application states that “DeepRock Disposal Solutions LLC is the owner of four Class II underground injection control (UIC) wells located in Warren Township, Washington County, Ohio: a. American Growers No. 1, API #34-167-2-9766-00-00 b. Heinrich Unit No. 1, API #34-167-2-9445-00-00 c. Heinrich Unit No. 2, API #34-167-2-9464-00-00 d. Vocational School Unit No. 2, API #34-167-2-9543-00-00.” **See Exhibit 27** Oil and Gas Waste Facility Permit Application Form Introduction Section 1.1.

The waste facility permit application states that DeepRock Disposal Solutions LLC “is requesting to modify their Surface Facility connected to their Class II underground injection control (UIC) facility (DeepRock Injection Facility) to remove the single, 966,000 gallon / 25,000bbl, 4-ring DYNA Tank (DYNA Tank) and replace it with two, 483,000 gallon / 11,500 bbl, 2-ring DYNA Tanks (replacement DYNA Tanks). The purpose of the project is to develop an effective and cost-efficient means of managing the separate waste streams from barging, rail and trucking and allow for ease of cleaning and maintenance in the future.” *See Exhibit 27* at Section 1.0.

A required enclosure for the waste application is a “Radiation Protection Plan.” Submitted with the enclosure was a letter dated July 1, 2020, and signed by “Executive Management,” including Dean Grose and Brian Chavez. Figure 1.0 in the radiation protection plan lists Brian Chavez as an owner of DeepRock:

**Figure 1.0: Organizational Chart for Management of Radiation Safety and Protection Program**

**See Exhibit 28** DeepRock Disposal Solutions, LLC Radiation Safety and Protection Plan, including at page 33, Radiation Safety Officer / Executive Management Letter of Understanding. While Brian Chavez is listed as an owner of DeepRock Disposal Solutions LLC, he does not disclose ownership in DeepRock Disposal Solutions LLC in either his 2023 or his 2024 financial disclosure forms. In both forms, Senator Chavez discloses mere employment with DeepRock Disposal Operating LLC. DeepRock Disposal Operating LLC is a separate legal entity from DeepRock Disposal Solutions LLC, even though DeepRock Disposal Operating LLC has a 2021 fictitious name registration as “DeepRock Disposal Solutions.” **See Exhibit 29** DeepRock Disposal Operating LLC Fictitious Name Registration. *See also* Exhibit 51 at page 6, West Virginia DeepRock Disposal Operating LLC Certificate of Registration of Assumed Trade Name “DeepRock Disposal Solutions.”

More evidence of Senator Chavez’s failure to disclose his interest in DeepRock Disposal Solutions LLC is in the form of a letter to ODNR Chief Eric Vendel requesting an informal meeting regarding ODNR Chief’s Order 2023-02, shutting down two of DeepRock’s Noble County injection wells for leaking brine or other waste substances to the surface. **See Exhibit 30** ODNR ORDER NO. 2023-02, Brian Chavez signs as the CEO of DeepRock Disposal Solutions LLC, and not as the CEO of the disclosed DeepRock Disposal Operating LLC. **See Exhibit 31** DeepRock CEO Brian Chavez January 20, 2023 letter to ODNR.

Beyond documents revealing employment and/or ownership beyond what was disclosed in his financial disclosure statements and publicly available documents showing interests in the injection well business, Senator Chavez displayed passion on the subject of injection wells on a level indicating a financial interest and/or ownership to a large group on August 4, 2025, where he commented as follows:

\* \* \*350 million years ago, this was all just a shallow sea. Over time, it got buried and compressed, so all the plant life, the algae, the sea life, whatever was there got buried and compressed deeper and deeper. Through heat and

pressure, that organic life got turned into hydrocarbons. Oil and gas. So, whenever you drill a well, and you extract that oil and gas, the oil and gas is going to come out along with that ancient seawater. So, you separate the oil, you separate the gas, what are you going to do with that ancient seawater? It used to be dumped on the ground. It used to be dumped in the Ohio River. The only thing left to do, since those two options aren't available anymore, is to put it back underground where it came from. So, when people are saying toxic radioactive waste, that is not true. Radioactivity: bananas are radioactive, people are radioactive. You are all getting radiation from the people around you. When you are outside, you are getting cosmic radiation. Three Mile Island. I'll give you this example: The event at Three Mile Island that shut down the nuclear industry for 40 years in the United States. The maximum dose that people got out of Three Mile Island was equivalent to eating a banana a day for 300 days in a row. So, we have to understand what we are actually talking about here. Our granite countertops are radioactive. The banana stand at Giant Eagle is radioactive. It doesn't mean that we are breathing in this toxic, you know, chemical that nobody knows anything about. Frack fluid, hydraulic fracturing: water, sand, biocide, and soap. So, they bring water out of the Ohio River. They have to put biocide in it to kill the germs and bacteria in there because when you pump it underground, it is 120 degrees down there, and that stuff grows, and it will clog up. It will grow bacteria down there. You put, uh, the sand in it as a scouring agent, so that when it goes in the formation, it will create little channels out there and actually act as a prop to keep the earth from coming back together exactly how it was. Um, you put the soap in there so that it is slicked up and is able to go through and not bind up just because of the friction of everything you are putting in there. That is what fracking fluid is. When people say that they are not disclosing what chemicals are in there, it's proprietary, it is because the soap is different that each one uses. And Halliburton thinks their soap is better than BJ Services, and they aren't going to tell each other what it is. But it is nothing to be afraid of. It is something that the industry needs. Right? We need to be able to hydraulically fracture. We used to do it with nitroglycerin and make explosions underground. Then we came to, uh, hydraulic fracturing. It is the safest way to do it. When you go back and you look at who is funding these companies or these anti-groups, it always goes back to Saudi Arabia and Russia, and now China. Why? Because they don't want the United States to be successful at uh, developing the minerals that we have. They want us to keep being dependent on them. So, that is why I get so passionate about it. And I apologize, I have been able to calm down a little bit now. \* \* \* (Minute 16:23) NASA just revised their estimate that there is a 3.1% chance that a major asteroid is going to hit the Earth in the next five years. That is actually tangible, right? Let's worry about that. Um, so, I just want, I want us to talk about it, have conversations, and not go to the immediate, bad, bad, tear down, tear down, tear down. Because that is what society has turned into. Let's ask the questions and have conversations. I'm willing to, I won't have an argument, but I'll have a conversation with you. So, we need to get more information out there. We have to do that because we are trying to fight

emotional arguments with facts, and folks go with emotions first. Right. It is hard to understand that something 5,000 feet is not going to go over and up. It is far more likely that the septic tanks along Route 7 are going to fail. So, that is why the sewer project is vitally important. So, thank you for indulging me. I am sorry, I have got a lot that I had to get off of my chest. After the uh, the operating budget, it took me a full week to decompress. It took me a full week to stop dreaming about it. The operating budget. Christy shook me awake one night, and she said, "Are you all right, are you all right, all right"? I said, "I guess, why"? And she said, "You were talking in your sleep." You kept saying, "No money, no money, no money." She said, "You never talked in your sleep, ever." But, that's how, that's how involved. So, it is an honor and a privilege to be doing it. I take everything that I do incredibly seriously. I will always do my utmost. The other thing to know is, I drink Warren water. My family drinks Warren water. We breathe this air. I am the last person that wants to see anything happen, and any examples I give you on uh, disposal wells causing issues somewhere, I can tell you exactly why that happened. And those fact patterns are different than what we have around here. So, help us understand how to help you. Um, again, I apologize for the rant and rave.\* \* \*

**See Exhibit 32** link Senator Chavez August 4, 2025 speech.

[https://drive.google.com/file/d/1kF39OvK2a5Fj5WSLBFjiPSoti6sXYnx1/vie  
w?usp=sharing](https://drive.google.com/file/d/1kF39OvK2a5Fj5WSLBFjiPSoti6sXYnx1/view?usp=sharing)

On August 15, 2025, Senator Chavez joined John Fortney on The President's Podcast to discuss injection wells. During this interview, Senator Chavez once again claims the produced water being injected into Ohio's Class II well is ancient seawater. And, he once again speaks about the biocides and soaps used in hydraulic fracking, and says that injection wells are "absolutely safe" and states that the injectate goes below "impervious rock." With an education limited to a bachelor's degree in chemical engineering, *See Exhibit 10*, Senator Chavez speaks as if he is an authority on injection wells, stating at minute 10, that the wells pose no threat to drinking water. **See Exhibit 33** link Ohio Oil and Gas Under Attack by California Funded Leftists - The President's Podcast | Podcast on Spotify at Minutes: 8:45, 9:30 and 10:00. <https://open.spotify.com/episode/2dFW1yrCpsKx4jSVD4FphW>

Senator Chavez's repeated public comments on injection well safety reveal either ignorance or dishonesty. On November 4, 2025, Catherine M. Helm-Clark, PhD in Geology, completed a Technical Review of the Stephan #1 and American Growers #4 Class II Injection Well Applications, and in her conclusion stated, "Based on the work described in this study, this researcher believes that the Stephan-1 and American Growers-4 Class II brine injection wells, as permitted, pose a real threat to underground sources of drinking water, especially the water supply for the city of Marietta, Ohio. The proposed high flow rates coupled with the low permeability of the Clinton Formation are a fatal pairing leading to geomechanical failure of these rocks, allowing injected brines to escape." **See Exhibit 34** November 4, 2025 Affidavit of Dr. Catherine M. Helm-Clark, in pertinent parts. Similarly, an August 6, 2025, Affidavit of Dr. Tej Gautam, PhD, Applied Geology, concludes: "\* \* \* the above variables and unknowns add uncertainty to the already complex geologic nature of the subsurface strata. In this situation, if we inject waste and it moves to upper layers or to a producing aquifer in the city, the damage cannot be undone." **See Exhibit 35** August 6, 2025 Affidavit of Dr. Tej Gautam.

On September 8, 2025, at a Marietta City Council joint Water and Sewer and Finance Committee meeting held on injection wells, Christyann Chavez addressed the council beginning at 1:41:05 and made the following statement:

My dad built the oil and gas company that I now own. This is deeply concerning to me that this council is making assumptions, making statements. But, you need to listen to experts. Um, you know my parents started this business, they were in the oil and gas business, I now operate a lot of injection, oil and gas wells (unintelligible). It is not a secret that two of the wells are called Heinrich #1 and Heinrich #2. That is my maiden name. Ok, the, the claim that you say all of the things in your report are actually facts, they are not all facts. You need to be very careful on the facts that you are listening to and make sure that you are really vetting those. Those wells, my father - Heinrich Enterprises permitted those wells. There were multiple um meetings, multiple articles, but, those are things that need to be questioned and resolved. \* \* \* **See Exhibit 36** link Marietta City Council Audio Recording from September 8, 2025 at 1:42:20.

[cms3.revize.com/revize/mariettaOH/Documents/Government/CityCouncil/9-8-25\\_streets-water-&sewer.m4a?t=202509231508180&t=202509231508180](https://cms3.revize.com/revize/mariettaOH/Documents/Government/CityCouncil/9-8-25_streets-water-&sewer.m4a?t=202509231508180&t=202509231508180)

Christyann Chavez then spoke of her leadership positions at both the Ohio Oil and Gas Association (“OOGA”) and the Southeast Ohio Oil and Gas Association (“SOOGA”). Brian Chavez has also served in leadership positions, as a trustee of OOGA, and as a past president of SOOGA. OOGA and SOOGA jointly mail three sets of pro-injection well flyers throughout Washington County after Christyann Chavez’s September 8, 2025 statement to the council and before the Marietta City Council’s October 2, 2025 votes on Resolution 80 - Writ of Mandamus, and Resolution 81 - Injection Well Moratorium. The first of the flyers arrived prior to the September 18, 2025 first reading on Resolution 80, a resolution to allow the city law director to file a writ of mandamus to force ODNR to follow settled law regarding injection well permit application review. **See Exhibit 37** OOGA and SOOGA flyers.

The then-pending Resolution 80 likely motivated Christyann Chavez to speak at the September 8, 2025 committee meeting. She concluded her statement at that meeting beginning at 1:47:34 of the recording with the following:

\* \* \* We have been doing oil and gas development in the City of Marietta, not in the City of Marietta, but, in the Washington County, and in the State of Ohio for 150 years. You know, Jerry James is a great person to talk about the history, of, of the, and if anybody wants to sit down with him he can teach us, um, Bob Chase knows all of the history, my dad knew the history, and I wish he could be here. Um, but, we need to listen to the experts, and we need to take, to take a moment, don’t turn the keys over to justice, you know, Earthjustice. Don’t turn the key over to an environment, an extreme environmental. This city was founded on oil and gas. And, we can prosper, and we can continue to develop and, and, and have safe water. The only – the whole reason we have injection wells is to dispose of the brine safely. And, that is what the company is doing.” (1:48:39)

After Christyann Chavez finished her comments speaking on behalf of DeepRock, at 1:48:46 members of the council asked questions, including Council President Vessels who asked about the current owner of the land on which the Career Center injection wells are situated and how much money a year Christyann Chavez made from the injection well industry. Laura Goins, DeepRock's attorney, advised Mrs. Chavez not to answer. (Recording at 1:49:10).



Image: Christyann Chavez (left) being advised by Attorney for DeepRock, Laura Goins (right). **See Exhibit 38** Photo from Signal Ohio. Ohio agency sued over permits for fracking waste injection wells.

<https://signalohio.org/ohio-regulators-skirted-rules-when-permitting-fracking-waste-wells-in-southeast-ohio-lawsuit-says/>

Attorney Goins earlier appeared on behalf of DeepRock at a July 29, 2025, Marietta City Council Committee of the Whole on injection wells. There, using a pen, she attempted to demonstrate that injection wells are “vertical vaults.” **See Exhibit 39** Marietta City Council Audio file July 29, 2025 at minute 22:30. [http://cms3.revize.com/revize/mariettaOH/7-29-2025 Part 1 \(1\).m4a?t=202507300914040&t=202507300914040](http://cms3.revize.com/revize/mariettaOH/7-29-2025%20Part%201%20(1).m4a?t=202507300914040&t=202507300914040)

On September 17, 2025, one day before the city council held its first reading on Resolution 80, John Fortney, the Ohio Senate Communications Director, sent a “Message to Marietta City Council and Mayor’s Office.” That message, and Councilor O’Neill’s response, are attached at **Exhibit 40**. Mr. Fortney’s letter claimed a “conflict of interest between several members of Marietta City Council and a far left so-called environmental group from Athens County that is funded by hundreds of thousands of dollars from four special interest groups in California.” Mr. Fortney further stated: “for Marietta City Council to remotely think it is sound judgement to consider maligning and suing a respected state agency represents a remarkable misuse of limited city resources.”

Also, just before the council’s first reading of Resolution 80, both Christyann Chavez and DeepRock attorney Laura Goins separately called Marietta Third Ward Councilor William Gossett. The audio file for the council meeting can be found on the city council website under Audio Recording

9-18-25 Regular Council Meeting Part one. Beginning at minute 29:03, Councilor Gossett made the following statement:

Yes Madam President, a couple of things I want to address was the letter that I read from John Fortney and that you read and that Erin had a rebuttal. Let me read the letter, and it says: "Marietta City Council needs to ask itself who it works for." I work for the citizens of Marietta. I do not care if you are a Republican or a Democrat, an Independent, it doesn't make any difference to me. I work for the citizens of Marietta and the Third Ward. That is the Ward that I am a representative for. Our well field sits right - directly in the center of my ward. That is a very big concern. For him to ask who we work for, and then they say that we are working for the leftists in California – that was part of it. Some of you here know that I (unintelligible) I am not a lunatic. The councilors that I work with who are Democrats are not lunatics. We all want what is best for the City of Marietta. And, as I read that letter, it made me angry when I got to the part where he wrote that Marietta needs to write its success story, not its sell-out story. I really don't care what John Fortney thinks, and with some of the statements made in that letter, I'm surprised he is still not at WTAP. With that being said, I am going to do everything in my power as a city councilmember to protect the wellfields in the city of Marietta as well as wellfields that are north of here, up the Muskingum River. With the migration from these wells, communication to other oil and gas wells, it is only going to take communication between one oil and gas well that has got a cracked casing, or other issues, one well to make its way into Marietta's waterfields. Some of you know what I am talking about, but it is a very frightening scenario. And, as I said before, I am not here for anybody, I'm not here to make money, of course, everybody knows that there is no money to be made on council. We do it for the love of serving the residents of Marietta. So, with that being said, I just want to publicly let everybody know, if this is a hill that I am going to die on, that is what I am prepared for. I have had enough of it. I have received somebody in my shop who was an elected county official. I will not mention his name, because I told him I wouldn't mention his name. I would never do that. And, he told me that you guys have to stop this. You can't do this. Because Marietta just got its – Southeastern Ohio just got its reputation back with the state and we don't want to lose it. I had no idea what that meant. I got another phone call from a very well-respected guy, I think the world of this guy. He wasn't, he wasn't telling me we needed to stop this, but, he asked me if we would sit down, told me how Eric Vendel was such a nice guy, and that he would sit down and talk with us and answer all the questions. Well, it has been pretty much silence from Mr. Vendel to Marietta City Council. I also received another phone call from, which I didn't answer because I – I didn't answer it, it was on my personal cell phone, so I didn't answer it – it was a number I didn't know – as many of you probably do that as well. Um, it was from the Attorney for DeepRock, Laura, uh Laura Goins – Goins, however you want to say that. And then, I got another call from Christy Chavez. That was a very, very short conversation, along my size. The answer that I gave was NOPE. So, all that being said, from my perspective, there's a

lot of people here in the county that are worried about money, and to hear Ms. Vessels read there was (not) enough money to take care of if there is a disaster, or whatever, there is no amount of money that could ever repair the aquifer. There is no amount of money that could ever replace what will happen to the City of Marietta once our well fields have been destroyed by brine. \* \* \*.

*See Exhibit 41* Audio Recording at minute 29:03.

[http://cms3.revize.com/revize/mariettaOH/Documents/Government/CityCouncil/Agendas and Minutes/9-18-25 regular council 1.mp3?t=202509241157160&t=202509241157160](http://cms3.revize.com/revize/mariettaOH/Documents/Government/CityCouncil/Agendas%20and%20Minutes/9-18-25%20regular%20council1.mp3?t=202509241157160&t=202509241157160)

On September 29, 2025, just four days before the city council voted on Resolution 80 directing Law Director Bertram to file a Writ of Mandamus to force ODNR to follow the law and to apply the correct set of rules to the review of permit applications, the Accountability Project Institute, a 501(c)(4), sent an email to the voting councilors, inviting them to visit [www.injectionwellfacts.com](http://www.injectionwellfacts.com). *See Exhibit 42* Accountability Project Institute website.

The website states that the council is “racing toward an unwinnable lawsuit.” It also states: “Make no mistake, the threatened lawsuit is a bad deal for Marietta taxpayers. It lacks standing, is unlikely to succeed, and it will be very costly.” While making disparaging statements about members of the council, the 501(c)(4) praised DeepRock, stating that “Senator Chavez’s family owns an interest in DeepRock, but he stepped away from active involvement when he was appointed to the State Senate.” *See Exhibit 42* at page 5.

The website mentions DeepRock’s public records requests to the Marietta City Council President. There exists no news article mentioning pending records requests, and given that there are no records requests that would have revealed the existence of such public records requests, it appears that the Accountability Project Institute was either working with, or at the very least, in communication with DeepRock attorney(s) or executives. *See Exhibit 43* Public records requests filed by DeepRock’s attorney seeking council president e-mails and other communications beginning in 2023.

On both his 2023 and 2024 financial disclosure statements, Senator Chavez does list DeepRock Disposal Operating LLC. This entity is a Delaware Corporation created on September 18, 2020. A foreign LLC filing occurred with the Ohio Secretary of State on November 23, 2020. *See Exhibit 44*. DeepRock Disposal Operating LLC, Registration of Foreign for Profit LLC, effective November 23, 2020. This filing occurred six days after a Fountain Quail and DeepRock Disposal Solutions merger article was published by ComTech Industries. *See Exhibit 45*.

Approximately four months later, on March 10, 2021, DeepRock Disposal Operating LLC filed a fictitious name document with the Ohio Secretary of State, the fictitious name being “DeepRock Disposal Solutions.” Having a fictitious name filing does not make the legal entities the same. This separateness is evidenced by a 2025 collection of unpaid commercial activity tax cases filed in Washington County. Washington County Clerk of Courts records reveal five 2025 state commercial activity tax liens against DeepRock Disposal Operating LLC. These five tax liens, totalling \$11,886.06, were released on October 23, 2025. *See Exhibit 46* DeepRock Disposal Operating LLC Tax Liens for 2025. Washington County Clerk of Court’s records show that similarly, DeepRock Disposal Solutions LLC, with the same 637 State Route 821 address as DeepRock Disposal Operating LLC, is a defendant

in four currently pending state commercial activity tax liens totalling \$1,230.21. *See Exhibit 47* DeepRock Disposal Solutions LLC Tax Liens for 2025.

It should be noted that all three new injection wells being applied for near the Marietta drinking water aquifer, American Growers #4 and Stephan #1 (Class II wells), and American Growers #3 (Class I well), have been applied for under the name of DeepRock Disposal Solutions LLC, and not under the name DeepRock Disposal Operating LLC. *See Exhibit 48* Cover sheets for the American Grower's #4 injection well application, the American Grower's #3 injection well application and the Stephan #1 injection well application.

The law firm that is listed as representing DeepRock Disposal Operating LLC for the state tax liens, namely, Allen Stovall Neuman & Ashton LLP is the same firm that was used to file the Articles of Organization for Funds Protection Investments LLC, DeepRock Disposal Solutions LLC, DeepRock Disposal Solutions, DeepRock Disposal Operating, LLC, and the same firm that represented DeepRock Disposal Services, LLC as a defendant in the foreclosure case, 16 FR 161. *See Exhibit 49* Case Party Information, Reply brief of DeepRock Disposal Services LLC, Search results for DeepRock Disposal Solutions connecting to DeepRock Disposal Services. *See also* Exhibits 16, 17, 29, and 44.

There is no Secretary of State record ever filed in Ohio, domestic or foreign, for DeepRock Disposal Services LLC. As a listed defendant, this entity would have been served as an interest holder in the assets of Water Energy Services, and according to the party information sheet for 16 FR 161, DeepRock Disposal Services shared the same 637 State Route 821 address utilized by both DeepRock Disposal Solutions LLC and DeepRock Disposal Operating LLC.

There is an active December 14, 2015, Mississippi Secretary of State LLC for "DeepRock Disposal Services LLC." It is a saltwater disposal well company. *See Exhibit 50* Mississippi Secretary of State filing DeepRock Disposal Services LLC; Reply Brief in Support of Motion for Release of Property, Washington County Case No. 16 FR 161. Further details regarding DeepRock Disposal Services LLC are not currently known to the affiants.

In his 2024 financial disclosure statement, Senator Chavez lists himself as an "employee resigned in 2024" of "DeepRock Disposal Operating LLC." The implication of limiting the interest in the filing to that of an employee is that there is no continuing interest after resignation. Beyond continuing ownership interests as indicated above, there is a continuing employment interest found in West Virginia Secretary of State records for the same legal entity. DeepRock Disposal Operating LLC has been registered as a foreign LLC in West Virginia since June 3, 2021.

West Virginia requires that LLCs file annual reports. In DeepRock Disposal Operating LLC's latest West Virginia annual report, on July 15, 2025, Brian Chavez is listed as a manager under the section: "Manager Information." Brian Chavez is also listed as a manager under the section: "Manager Information" for the 2022 LLC annual report. According to West Virginia Secretary of State records, the company failed to file annual reports for the years 2023 and 2024. *See Exhibit 51* All West Virginia Secretary of State filings for DeepRock Disposal Operating LLC.

Publicly available statements and records indicate that Senator Chavez has failed to disclose his and/or his immediate family members' interests in five active limited liability companies: 1. Heinrich

Property LLC; 2. Horizon Partners Investments LLC; 3. Funds Protection Investment LLC; 4. Condevco Operating LLC; and 5. DeepRock Disposal Solutions LLC.

Beyond the lawsuits, applications, and public filings revealing interests in the injection well business, Senator Chavez and Christyann Chavez's own words point toward the existence of undisclosed interests. Failing to list a single LLC for which you have an interest on a state financial disclosure form is a problem. Failing to fully disclose interests in as many as five or even six LLCs, depending upon a likely interest in DeepRock Disposal Services LLC, is more than a simple oversight. Additionally, signing documents as the CEO of DeepRock Disposal Solutions LLC, but failing to disclose employment, or any other interest, with respect to that specific company at any point in the past, is not a standard that the Ohio Ethics Commission should want to set.

## **II. Conclusion: Ohio ethics laws involving conflicts of interest and disclosure of assets must be enforced.**

The primary reason for the existence of the Office of the Legislative Inspector General and the Joint Legislative Executive Commission is to preserve public trust in our institutions by ensuring that public officials and employees abide by Ohio ethics laws.

During his August 4, 2025, speech, Senator Chavez bragged about his committee appointments and stated, "I started my actual freshman year this year. I was the chairman of the Energy Committee, and I am the Vice Chair of the Finance Committee. Those are the two biggest committees in the state, so arguably, I am one of the most influential people in the State, on a day-to-day basis." *See Exhibit 28* August 4, 2025, audio recording at 00:45. As a self-described "one of the most influential persons in the State," Senator Chavez is using his public position to influence and advance Senate Bill 219, which will benefit his interests and/or those of his immediate family.

The amendments to the Orphan Well Program proposed in Senate Bill 219, and Senator Chavez's interest in Chavez Well Service, which has actively bid on five contracts and won one since he became a senator, demonstrate the use of public position to definitely and directly affect his own personal and pecuniary interest. Further, the injection-well-friendly provisions of Senate Bill 219 will advance the financial interests of those connected to the injection well industry.

Evidence shows that Senator Chavez's 2023 and 2024 financial disclosure statements fail to list credible interests in five LLCs: 1. Heinrich Property LLC; 2. Horizon Partners Investments LLC; 3. Funds Protection Investment LLC; 4. Condevco Operating LLC; and 5. DeepRock Disposal Solutions LLC. Further, evidence shows that Senator Chavez's 2023 and 2024 financial disclosure statements fail to reveal employment on behalf of DeepRock Disposal Solutions LLC.

To preserve public trust in Ohio institutions, Senator Chavez must be held accountable to the full extent of the law for using his position to promote his own pecuniary interest and for his failure to disclose employment and several LLCs in which he and/or his close family members have demonstrable interests.

The Joint Legislative Ethics Committee has the authority, the power, and an obligation to act to hold accountable public officials, no matter how powerful and well-connected they might be. Senator Chavez should be held accountable as the Senate Energy Committee chairman. He should not be sitting as chairman of the committee and sponsoring, fast-tracking, and controlling energy-related legislation that stands to benefit businesses in which he and/or close family members maintain interests.

Please do your part to restore public trust in our government.

State of Ohio County of Washington SS:

I hereby swear the above information to be true and accurate, to the best of my knowledge.

Dated this 14 day of January 2026

George Banziger

George Banziger, Member, Washington County for Safe Drinking Water



MICHELE E MARTIN  
NOTARY PUBLIC  
STATE OF OHIO  
Comm. Expires  
April 18 2026

Michele E. Martin

State of Ohio County of Washington SS:

I hereby swear the above information to be true and accurate, to the best of my knowledge.

Dated this 10 day of January 2026

Dawn Hewitt

Dawn Hewitt, Member, Washington County for Safe Drinking Water



MICHELE E MARTIN  
NOTARY PUBLIC  
STATE OF OHIO  
Comm. Expires  
April 18 2026

Michele E. Martin

State of Ohio County of Washington SS:

I hereby swear the above information to be true and accurate, to the best of my knowledge.

Dated this 14 day of January 2026

Betty J. Malcolm

Betty Malcolm, Member, Washington County for Safe Drinking Water



MICHELE E MARTIN  
NOTARY PUBLIC  
STATE OF OHIO  
Comm. Expires  
April 18 2026

Michele E. Martin

State of Ohio County of Washington SS:

I hereby swear the above information to be true and accurate, to the best of my knowledge.

Dated this 14 day of January 2026

Hillary Royster

Hillary Royster, Member, Washington County for Safe Drinking Water



MICHELE E MARTIN  
NOTARY PUBLIC  
STATE OF OHIO  
Comm. Expires  
April 18 2026

Michele E. Martin

## EXHIBITS

1	Ohio Revised Code Section 102.03
2	Senator Brian Chavez 2023 Financial Disclosure Statement
3	Senator Brian Chavez 2024 Financial Disclosure Statement
4	Ohio Legislative Service Commission Fiscal Note and Local Impact Statement of SB 219 both versions: As Introduced and As Passed by the Senate
5	Ohio Senate Article “Chavez Supports Historic Oil and Gas Modernization”
6	Ohio Secretary of State Subsequent Agent Appointment for Chavez Well Service LLC
7	Chavez Well Service Orphan Well Program contracts in chronological order
8	Senate Bill 219 at Page 64, lines 1851 to 1857. Bill Text: OH SB219   2025-2026   136th General Assembly   Comm Sub <a href="https://legiscan.com/OH/text/SB219/id/3285191">https://legiscan.com/OH/text/SB219/id/3285191</a>
8A	Marietta City Council Resolution No. 81, Moratorium Resolution.
9	Legacies Live Forever: The Heinrich Family <a href="https://www.mcfohio.org/news/legacies-live-forever-the-heinrich-family">https://www.mcfohio.org/news/legacies-live-forever-the-heinrich-family</a>
10	Senator Brian M. Chavez Biography   Ohio Senate <a href="https://www.ohiosenate.gov/members/brian-m-chavez/biography">https://www.ohiosenate.gov/members/brian-m-chavez/biography</a>
11	Washington County Common Pleas Court 16 FR 161 Complaint
12	Heinrich Property LLC parcel ownership list and highlighted GIS map image of a parcel near the Career Center injection well
13	Heinrich Property LLC Articles of Organization
14	Washington County Common Pleas Court 16 FR 161 Asset Purchase Agreement
15	Washington County Common Pleas Court 16 FR 161 Bill of Sale listing Acquired Assets
16	Funds Protection Investment LLC Articles of Organization
17	DeepRock Disposal Solutions LLC Articles of Organization
18	Washington County Common Pleas Case 17OT163, Chavez Affidavit: Assignment and Assumption of Asset Purchase Agreement
18A	ODNR Owner Number 9896: DeepRock Disposal Solutions LLC, all Form 9 (Authority and Organization Form) filings from March 7, 2017 to present.
19	Condevco Operating LLC Articles of Organization
20	Condevco, Inc. Secretary of State filing
21	Water Energy Services Ownership Diagram
22	Memorandum of Sublease Agreements on Career Center Wells, found at Washington County Common Pleas Court Case Number 17OT30

23	Quitclaim Assignment of Class II Injection Sublease Agreements signed for Heinrich Production by Christy Chavez and For Horizon Partners Investments by Christy Chavez
24	Articles of Organization for Horizon Partners Investments LLC
25	Affidavit of Christyann Chavez, Washington County Case # 17OT163 Exhibit C
26	Forte' Productions Letter to Christy Chavez
27	Oil and Gas Waste Facility Permit Application Form Introduction Section 1.1
28	DeepRock Disposal Solutions LLC Radiation Safety and Protection Plan
29	DeepRock Disposal Operating LLC Fictitious Name Registration
30	ODNR ORDER NO. 2023-02
31	DeepRock CEO Brian Chavez January 20, 2023 letter to ODNR
32	Chavez August 4, 2025 audio file <a href="https://drive.google.com/file/d/1kF39OvK2a5Fj5WSLBFjiPSoti6sXYnx1/view?usp=sharing">https://drive.google.com/file/d/1kF39OvK2a5Fj5WSLBFjiPSoti6sXYnx1/view?usp=sharing</a>
33	Ohio Oil and Gas Under Attack by California Funded Leftists - The President's Podcast   Podcast on Spotify. <a href="https://open.spotify.com/episode/2dFW1yrCpsKx4jSVD4FphW">https://open.spotify.com/episode/2dFW1yrCpsKx4jSVD4FphW</a>
34	Court of Appeals of Franklin County, Ohio, Buckeye Environmental Network v. Mary Mertz, Exhibit F Affidavit and Dr. Catherine M. Helm-Clark
35	Affidavit of Dr. Tej Gautam
36	Marietta City Council Audio Recording, September 8, 2025 at 1:42:20 <a href="https://cms3.revize.com/revize/mariettaOH/Documents/Government/City%20Council/9-8-25%20streets-water%20&amp;%20sewer.m4a?t=202509231508180&amp;t=202509231508180">https://cms3.revize.com/revize/mariettaOH/Documents/Government/City%20Council/9-8-25%20streets-water%20&amp;%20sewer.m4a?t=202509231508180&amp;t=202509231508180</a>
37	OOGA and SOOGA flyers
38	Signal Ohio Photo November 17, 2025 Ohio agency sued over permits for fracking waste injection wells <a href="https://signalohio.org/ohio-regulators-skirted-rules-when-permitting-fracking-waste-wells-in-southeast-ohio-lawsuit-says/">https://signalohio.org/ohio-regulators-skirted-rules-when-permitting-fracking-waste-wells-in-southeast-ohio-lawsuit-says/</a>
39	Marietta City Council Audio file July 29, 2025 at minute 22:30 <a href="https://cms3.revize.com/revize/mariettaOH/7-29-2025%20Part%201.m4a?t=202507300914040&amp;t=202507300914040">https://cms3.revize.com/revize/mariettaOH/7-29-2025%20Part%201.m4a?t=202507300914040&amp;t=202507300914040</a>
40	John Fortney ‘Message to Marietta City Council and Mayor’s Office’ with Councilor Erin O’Neill response
41	September 18, 2025 Regular Meeting Audio Recording at 29:03 <a href="https://cms3.revize.com/revize/mariettaOH/Documents/Government/City%20Council/Agendas%20and%20Minutes/9-18-25%20regular%20council%201.mp3?t=202509241157160&amp;t=202509241157160">https://cms3.revize.com/revize/mariettaOH/Documents/Government/City%20Council/Agendas%20and%20Minutes/9-18-25%20regular%20council%201.mp3?t=202509241157160&amp;t=202509241157160</a>
42	Accountability Project Institute website: <a href="http://www.injectionwellfacts.com">www.injectionwellfacts.com</a>
43	Public records requests filed seeking the council president's e-mails beginning in 2023
44	DeepRock Disposal Operating LLC, Registration of Foreign for Profit LLC, effective November 23, 2020
45	DeepRock & Fountain Quail Merger Creates Large Scale Opportunities for the Basin - Comtech Industries <a href="https://comtechindustriesinc.com/news/deeprock-fountain-quail-merger-creates-large-scale-opportunities-for-the-basin/">https://comtechindustriesinc.com/news/deeprock-fountain-quail-merger-creates-large-scale-opportunities-for-the-basin/</a>
46	DeepRock Disposal Operating LLC Tax Liens for 2025
47	DeepRock Disposal Solutions LLC Tax Liens for 2025

48	Cover sheets for the American Grower's #4 injection well application, the American Grower's #3 injection well application, and the Stephan #1 injection well application.
49	Washington County Case No. 16 FR 161 Party Information and Reply brief of DeepRock Disposal Services LLC, search results for DeepRock Disposal Solutions connecting to DeepRock Disposal Services
50	Mississippi Secretary of State filing DeepRock Disposal Services LLC; Reply Brief in 16 FR 161 Support of Motion for Release of Property
51	All West Virginia Secretary of State filings for DeepRock Disposal Operating LLC