

**TEXAS NATURAL RESOURCE CONSERVATION COMMISSION
TECHNICAL PEER REVIEW DOCUMENT**

<i>This Section to be Completed by Issue Initiator</i>	
TITLE OR ISSUE	
Required notification and approval for workovers	
DOCUMENT INITIATED BY (Name/Office/Phone Number)	DATE
Charles J. Greene, Geologist/UURW/I&HW/OWM/(512)239-6634	12/18/96
ISSUE DESCRIPTION	
What constitutes a workover requiring notification and approval?	
WHO'S AFFECTED?	
Well Operators, TNRCC UIC staff and Regional Office Inspectors	
<i>This Section to be Completed by Peer Review Team</i>	
FACTORS CONSIDERED	
30 TAC §331.63(h) requires notification for all workovers as follows:	
<p>“(h) The permittee shall notify the executive director before commencing any workover operation or corrective maintenance which involves taking the injection well out of service. The notification shall be in writing and shall include plans for the proposed work. The executive director may grant an exception to the prior written notification when immediate action is required. Approval by the executive director shall be obtained before the permittee may begin any workover operation or corrective maintenance that involves taking the well out of service. Pressure control equipment shall be installed and maintained during workovers which involve the removal of the tubing.”</p>	
<p>This provision requires notification and approval for all workovers. The requirement for prior written notification may be waived by the executive director when immediate action is required.</p>	
<p>Major operations are described in 30 TAC §331.63(I) as follows:</p>	
<p>“(I) Mechanical integrity shall be demonstrated following any major operations which involve removal of the injection tubing, recompletions, or unseating of the packer.”</p>	
<p>Workovers require a demonstration of mechanical integrity (MIT) following the work. The type of MIT will depend on the nature of the work performed. Generally removing the tubing and replacing it in most instances will require an annulus pressure test. Recompletions, remedial cementing operations, installation of liners, ect., will require both an annulus pressure test and a radioactive tracer survey.</p>	

Federal Rules 40 CFR §146.3 define well stimulations as several processes to clean the well bore. The definition lists (1) surging, (2) jetting, (3) blasting, (4) acidizing, (5) hydraulic fracturing as types of well stimulations. Workovers are not listed in the federal definitions section. Workovers are mentioned in 40 CFR 146 in section 13(c)(2)(iii) in Reporting requirements where they are required to be reported in the quarterly reports.

FINDING(S) AND RECOMMENDATION(S)

Define workover in rules as an operation in which a down hole component of a well is repaired, the engineering design of the well is changed, or the mechanical integrity is compromised. Workovers include operations such as sidetracking, the addition of perforations within the injection interval, and the addition of liners or patches.

Workovers should require notification with a description of the work to be performed and approval by the UIC staff. A report describing the work performed should follow the workover. Rule revision is recommended to indicate what type of mechanical integrity testing is required for different types of workovers.

Drop Section 3, Question 6 of the Disposal Well Inspection Checklist.

COMMENTS

REVIEW COMPLETED BY	NAMES	INITIALS	DATE
<u>X</u> Technical Review Group	Ben Knape, UURW	_____	_____
	Charles Greene, UURW	_____	_____
	Hong Guo, UURW	_____	_____
<u>NA</u> Section Technical Panel	Jim Boswell, UURW	_____	_____
	Mike Hull, Region 1	_____	_____
<u>NA</u> Division Senior Technical Committee	Aron Athavaley, Region 12	_____	_____
	Mark Cheesman, Merichem	_____	_____
___ Chief Engineer/Senior Technical Council	Steve Fotiades, DuPont	_____	_____
	James Clark, DuPont	_____	_____
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