

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

TECHNICAL PEER REVIEW DOCUMENT

This Section to be Completed by Issue Initiator

TITLE OR ISSUE

Guidance for inspectors concerning standardized records requests and review procedures .

DOCUMENT INITIATED BY (Name/Office/Phone Number)

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DATE

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ISSUE DESCRIPTION

There is a need in the UIC Program to provide guidance to inspectors on specific Class I well inspection procedures, particularly concerning review of well operating records. A primary concern in implementation of the UIC Program is maximizing efficiency of well inspections to promote regulatory compliance, given limited resources, i.e., time, funding, and personnel, allocated to the task. In this regard, new inspectors may be unclear whether they should review every bit of operating data recorded since the previous inspection, or whether it is advisable instead to conduct "spot checking" of operating records during a well inspection. Generally, inspection by spot checking conserves inspection resources for more detailed investigation in areas of discovered problems or inspection of other facilities using a risk-based targeting strategy. From an operator's perspective, the sufficiency of time for retrieval of well records that the inspector requests to review is a basic concern. The sufficiency of time is mainly determined by the amount of advance notice of an inspection that is provided by an inspector and how much detail the inspector has provided about which records he/she will want to review during the inspection.

WHO'S AFFECTED?

Class I well operators, inspectors, and UIC program administrators.

This Section to be Completed by Peer Review Team

FACTORS CONSIDERED

Most efficient use of limited program resources for well inspections is achieved by the following actions: (1) Elimination of duplicated effort between parts of TNRCC which share responsibility for the UIC Program. The 20 Points of Light Project has identified and eliminated such duplication of effort in a number of areas. (2) Maintaining flexibility for conservation and use of resources according to risk-based inspection targeting strategies through guidance on standardized procedures and appropriate levels of detail for inspections (such efforts allow inspection resources to be concentrated in higher risk areas, rather than being inordinately consumed in low-risk areas). (3) Improving effectiveness in finding environmentally significant violations by prioritizing inspection activities to focus on operating parameter data. (4) Promoting mutual understanding between inspectors and operators of standardized procedures to save time during inspections in retrieval and review of records.

1. The report from the previous inspection of a Class I well facility should be reviewed by an inspector prior to conducting a new inspection of the facility, and should be available for reference during the inspection. 2. Although TNRCC policy on advance notice of inspection may change over time, circumstances may dictate conducting an inspection with little or no advance notice. In situations where advance notice of inspections is appropriate, communication between the inspector and operator should confirm the availability of key operator staff at the scheduled inspection time in order to provide well records, that will be inspected. 3. Inspection of well records generally should be limited to the period of time dating back to the previous inspection of the well. If there are problems discovered during such review that indicate possible undetected problems prior to the previous inspection, or which could be more easily analyzed through review of older records, then the inspector may request to review such older records. 4. Inspecting well records by spot checking should be considered standard procedure for all Class I wells. Such spot checking allows (a) budgeting of inspection time to allow a focus in greater detail on any significant problems discovered, and (b) concentration of inspection resources on activities/facilities posing the greatest environmental risk. 5. During the inspection, priority should be given to a review of operating parameter records (injection pressure and rate, annulus monitoring, specific gravity and pH). Financial assurance status should be determined prior to inspections through consultation with Financial Assurance Section staff and will not normally need to be addressed during the inspection at the wellsite.

COMMENTS

REVIEW COMPLETED BY

NAMES

INITIALS

DATE

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