

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

This Section to be Completed by Issue Initiator

TITLE OR ISSUE

Underground Injection Control (UIC) well operators have not been consistent in their emergency reporting requirements as found in 30 TAC §331.65.b.5. The section requires 24 hour notification of the UIC Unit in Austin of any significant change in monitoring parameters, or of any other observation, which could reasonably be attributed to a leak or **other failure of the well equipment** or injection zone integrity.

It is perceived that several UIC operators may be unnecessarily conducting 24 hour notification under this provision as there is some confusion as to what is implied by “or other failure of well equipment”.

DOCUMENT INITIATED BY (Name/Office/Phone Number)

DATE

Steve Fotiades/DuPont-Victoria, 512-572-1451

10/18/96

ISSUE DESCRIPTION

UIC operators at times are not certain what “**other failure of the well equipment**” refers to in 30 TAC §331.65.b.5. Operators have not been consistent in their interpretation of this statement and report, on a 24 hour basis, any equipment failure that results in a permit violation.

WHO'S AFFECTED?

All Class 1 UIC well operators.

This Section to be Completed by Peer Review Team

FACTORS CONSIDERED

Since the agency does not want to impose unnecessary reporting on UIC operators, the agency will clarify its intent of the above referenced regulation.

The regulation in question is focused on failures within the well itself that may cause damage to underground drinking water sources or result in waste leaving the permitted injection interval. A very conservative interpretation of this regulation by UIC operators has resulted in unnecessary 24 hour notification when surface equipment has failed but there was no indication that a well failure had occurred.

If a permit violation occurs that does not imply a leak or well failure, the operator is only required to self report the incident quarterly. Both a leak and well failure refer to loss of mechanical integrity of the well or the integrity of the injection zone.

FINDING(S) AND RECOMMENDATION(S)

Guidance should be issued to UIC operators and TNRCC regional offices to clarify the intent of TAC §331.65.b.5. The guidance document would state that 24 hour notification is only required when a well failure is reasonably suspected. Notice within 24 hours is not required if support systems fail (annulus pumps, continuous monitoring, injection pumps, etc.) and there is no reasonable evidence that an internal well failure has occurred the resulted in the loss of well mechanical integrity or injection zone integrity. If a permit violation occurred during the incident, it shall continue to be reported on the operator's Quarterly Self Reporting Form.

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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Send copies to:

- Chief Engineer
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- Issue Initiator
- Case Coordinator
- Other: ED, Deputy Directors, Deputy Directors
- Central Records