

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

This Section to be Completed by Issue Initiator

TITLE OR ISSUE

The instructions on the UIC Class I Injection Reporting Forms for "**Annulus Pressure Differential**" are not clear as to whether operators should be reporting the absolute lowest value that occurred during the month or the lowest value that resulted in a permit exceedance (violation).

The remaining parameters that are reported have instantaneous limits so all exceedance must be reported.

DOCUMENT INITIATED BY (Name/Office/Phone Number)

DATE

Steve Fotiades - DuPont

12/18/96

ISSUE DESCRIPTION

Class I injection well operators do not appear to be consistent in reporting certain operating parameters on their operating reports. Some Class I injection well operators view the primary purpose of the reporting form is to report well operating data (high, low, and average monitoring parameters), while other operators seem to use the form more for permit violation reporting.

The problem centers around the reporting of "**Annulus Pressure Differential**" since it is a permit parameter that may have a specified time period during which its value can be below its permit limit without a permit exceedance occurring. Some Class I injection well operators report the absolute lowest annulus differential pressure that occurred during a month (even though no permit exceedance occurred), while other operators report the lowest annulus differential pressure that resulted in a permit exceedance (i.e. lasted longer than a specified time limit).

WHO'S AFFECTED?

Class I Injection Well Operators and Regional Inspectors

This Section to be Completed by Peer Review Team

FACTORS CONSIDERED

The agency does not want to impose unnecessary reporting requirements, but at the same time desires Class I injection well operators to complete the reporting forms in a consistent manner. Permits allow up to a maximum 15 minute period of time when a low annulus differential pressure deviation may occur (during start-ups, shutdowns, or sudden pressure changes) without the operator incurring a permit violation, unless otherwise specified by a permit condition.

The primary intent of the reporting form is to report on the operating performance of the well itself. The form should be clear in reflecting the pattern and operating history of each well during the month. A secondary goal, however, is for the operator to report actual permit exceedances (violations) that occurred during the month. Reporting of a permit exceedance for "**Annulus Pressure Differential**" therefore, should take into account the allowable time period when the parameter is below its permit limit .

FINDING(S) AND RECOMMENDATION(S)

The Technical Review Group believes the primary purpose of the operating report is to report a well's operational history and secondarily to report on actual permit exceedances (violations). However, the TRG does not see any value in reporting data spikes, instrument noise, instrument calibrations or other brief pressure changes that are not reflective of the Class I disposal well's operation for the vast majority of the time during the month.

Therefore, Class I injection well operators shall continue to report all annulus differential pressure permit violations. Additionally, Class I injection well operators shall report the lowest monthly annulus differential pressure occurrence that is in excess of 15 minutes, even if a permit violation did not occur. The operating report form allows the operator to denote that a violation did or did not occur during this period of low pressure.

The Class I injection well inspection checklist would be modified to reflect this change when comparing reported annulus differential pressure with the recorded annulus differential pressure.

COMMENTS

| REVIEW COMPLETED BY | NAMES | INITIALS | DATE |
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