

O. PLANS FOR WELL FAILURES

Outline contingency plans to cope with all shutins or well failures, so as to prevent migration of fluids into an USDW.

Loss of Annular Pressure Differential

In the event that the annulus pressure cannot be maintained at a level at least 100 psi above injection pressure, the computer will immediately (in less than one minute) shut down the injection pump and send an alarm to the plant operator. It will be assumed a leak exists in the subsurface well equipment. The plant operator will displace the tubing with 3000 gallons clean brine, isolate the well from the system, and notify EPA Region 5. A workover rig will be brought in to diagnose and repair the problem. Once the problem is repaired, all impacted subsurface equipment will be mechanical integrity tested. EPA permission will be obtained prior to putting the well back into operation.