

Region 5 UIC Permit Application Summary (Class I, II, III)

Permittee Name:	Well Name:	Well Class:
Well Location Digital Latitude:	Well Location Digital Longitude:	Date of Application Submittal:

Attachment A. Map(s) and Area of Review

Part I. Well Location(s)

For Individual Permits: If the surface location provided in the accompanying 7520-6 form does not adequately describe the well location (i.e., due to deviation, directional, or horizontal drilling), please describe the well's orientation and provide the top- and bottom-hole coordinates, as appropriate. If any monitoring wells are proposed as part of this permit application, provide coordinates for all monitoring wells.

For Area Permits (40 CFR § 144.33): Provide information similar to what is outlined above for individual permits for each well (existing or proposed) to be covered by this permit. In addition, provide a description of the proposed permitted area. At a minimum, this area should include all the proposed or existing wells known at the time of permit application submittal. For circular areas, this description should consist of a defined-radius from a singular point whose coordinates have been given. For polygonal areas, use a series of coordinates describing the vertices or corners of the area. Submit a Geographic Information System (GIS) file, if available.

Part II. Area of Review Size Determination (40 CFR § 146.6)

For All Permits. Give the method (fixed radius or equation) and, if appropriate, all calculations used to determine the size of the area of review (AOR). If you are uncertain as to which method to use, consult with your regional EPA office.

The AOR must be a minimum radius of one-fourth (1/4) mile from the well bore, including a well's lateral, or the proposed area permit boundary for area permits, unless the use of an equation is approved by the Director.

In addition, for Class II enhanced oil recovery well(s). The AOR will be at a minimum the larger of the following: one-fourth (1/4) mile radius or the distance to the nearest active producer in the production formation.

Part III. Map(s) (40 CFR §§ 144.31 & 146.24)

Submit a topographic map (or other map if a topographic map is unavailable) extending one mile beyond the facility property boundary showing:

- project injection well(s), well pad(s) and/or project area,
- applicable area of review,
- all outcrops of injection and confining formations,
- all surface water intake and discharge structures, and
- all hazardous waste treatment, storage, or disposal facilities.

Consult with your EPA regional office for the definition of the facility property boundary.

The information below does not apply to existing rule authorized Class II well(s).

Within the one-fourth (1/4) mile beyond the facility property boundary or the AOR, whichever is larger, the map will also show the:

- name and location of all production wells, injection wells, abandoned wells, dry holes, and all water wells, noting their types (public water system, domestic drinking water, stock, etc.),
- springs and surface bodies of water,
- mines (surface and subsurface) and quarries, and
- other pertinent surface features, including residences, schools, hospitals, and roads.

Only information of public record and pertinent information known to the applicant is required to be included on this map. Multiple maps may be needed to display this information clearly. If a certain feature is not present in the area covered, please state so definitively (e.g., *"There are no known outcrops of the confining formation in the mapped area."*).

Part IV, below does not apply to existing rule authorized Class II well(s).

Part IV. Area of Review Wells and Corrective Action Plans (40 CFR §§ 144.55 & 146.24)

Submit a tabulation of data and wellbore diagrams reasonably available from public records or otherwise known to the applicant on all wells within the AOR included on the map, which penetrate the proposed confining zone(s). Such information will include:

- well name, location and depth,
- well type,
- date well was drilled,
- well construction that includes casing and cement details, including demonstrated or calculated top of cement,

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- cement bond logs (if available), and
- record of well completion and plugging (if applicable).
- For such wells which are improperly sealed, completed, or abandoned, also submit a plan consisting of such steps or modifications as are necessary to prevent movement of fluid into USDWs.

Part V. Landowners Information (40 CFR § 144.31 and part 147)

Identify and submit a list with the names and addresses of all owners of record of land within one-fourth (1/4) mile of the facility property boundary. This requirement may be waived by the Regional Administrator if the site is in a populous area and the Regional Administrator determines that the requirement would be impracticable.

Consult with your regional EPA office, as additional state landowner notification requirements may apply (40 CFR part 47).

Attachment B. Geological and Geophysical Information

Part I. Geological Data (40 CFR§146.24)

Provide the following information:

- geological data on all formations from the surface to the base of the injection well, identifying all USDWs and confining and injection zone(s). This data includes the lithologic description, geological name, thickness, depth, and total dissolved solids (TDS) concentrations from these formations (if known),
- source of information for the geologic data and formation TDS,
- porosity and permeability of injection formation (if available),
- geological cross-sections (if available) proximate to the injection well that includes the confining and injection zones. The cross-sections should illustrate the regional geologic setting and show the thickness and lateral continuity of the confining zone(s) through the area of review,
- within the AOR, identify known or suspected faults and fracture systems. If identified, provide proximity to the injection zone and the effect the fault/fracture system may have on the injection activities, and
- a history of seismic activity in the area and proximity to crystalline (i.e., granitic) basement.

Part II. Proposed Formation Testing Program (40 CFR §146.22) Provide a formation testing program to obtain data on:

- fluid pressure,
- estimated fracture pressure, and
- physical and chemical characteristics of the injection zone.

Attachment C. Well Construction/Conversion Information

Part I. Well Schematic Diagram (40 CFR § 146.24)

Provide a detailed proposed well schematic diagram that includes:

- identification of USDWs and confining and injection zones,
- casing and cementing details, including demonstrated or calculated top of cement,
- tubing and packer (if applicable),
- open hole or perforated intervals, and
- surface trace (if horizontal or deviated well).

For wells that are drilled and to be converted to an injection well, also provide the current well schematic diagram.

Part II. Well Construction or Conversion Procedures (40 CFR §§ 144.52, 146.22, & 146.24)

- Provide detailed description of well construction or conversion procedures, that includes:
- proposed logs and other tests conducted during the drilling and construction of new well(s),
- proposed stimulation plan(s), if planned, and description of alarms and shut-down systems at the well (if applicable).

For wells that are drilled and to be converted to an injection well, also provide:

- well completion and cementing records, and
- previously run logs/tests.

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Attachment D. Injection Operation and Monitoring Program (40 CFR §§ 146.23 & 146.24)

Submit the following information:

- flow diagram of fluid flow through the facility,
- contingency plan(s) to cope with well failure, so as to prevent migration of contaminating fluids into a USDW,
- drawing of the surface construction,
- locations of all monitoring devices (show on the map(s) referenced in section A.III. above), and
- description of sampling and monitoring devices to monitor the nature of the injected fluids, injection pressure, annulus pressure (if applicable), flowrate, and cumulative volume.

Hydrocarbon storage and enhanced recovery may be monitored on a field or project basis rather than on an individual well basis by manifold monitoring. If a manifold monitoring program is utilized, describe details of the monitoring program and how the program is comparable to individual well monitoring. Also, include on the map in section A.III.B, the distribution manifold applying injection fluid to all wells in the area, including location of all system monitoring locations.

Additionally, submit the following proposed operating data for each well in the individual or area permit:

- average and maximum daily rate and volume of fluids to be injected,
- average and maximum injection pressure,
- source(s) of injection fluids (including field and formation names),
- proposed annular fluid, and
- analysis of the chemical and physical characteristics of the injection fluid. At a minimum, this should include pH, specific gravity, TDS, and conductivity. Consult with the regional EPA office for additional guidance.

Attachment E. Plugging and Abandonment Plan (40 CFR §§ 144.31, 144.51 & 146.24)

Submit a plugging and abandonment (P&A) plan of the well on EPA Form 7520-19 along with a P&A diagram. The plan should include:

- type, and number of plugs to be used,
- placement of each plug including the elevation of top and bottom,
- type, grade, and quantity of cement to be used, and
- method of placement of the plugs.

Provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to conduct the work proposed in the P&A plan for EPA to contract plugging of the well. This is to ensure that EPA has adequate funding to plug the well(s) if the operator is unable to plug the well(s).

Consult with the regional EPA office for additional guidance on developing the P&A plan and cost estimate calculations.

Specifications for well construction and plugging and abandonment:

- All uncemented casing ripped.
- Cement plug of at least 250 feet immediately above the injection zone or
- 50 feet of cement immediately above a cast iron bridge plug. 250 feet is required above cement retainer if situated adjacent to the injection zone.
- Cement plug set at least 50 feet above and 50 feet below any casing rip point.
- If surface casing is not cemented to surface, a cement plug set at least 50 feet below the lowest USDW to surface.
- If surface casing is cemented to surface and extends below the lowermost USDW, a cement plug from at least 50 feet above the USDW base to 50 feet below the shoe is required and a cement plug from at least 50 feet depth to the surface is required.
- If surface casing is cemented to surface and the lowermost USDW is below the surface casing setting depth, a cement plug from at least 50 feet below the USDW base to 50 feet above the casing shoe is required and a cement plug from at least 50 feet depth to the surface is required.
- If the lowermost USDW depth is less than 500 feet, then set a continuous cement plug from 50 feet below the lowermost USDW to the surface.

Example of how to calculate cement plug:

From Halliburton cementing Tables: Section #210 Capacity:

5-1/2" casing and 15.5 lb weight..... 7.483 ft/ft³

7-7/8" hole..... 2.9565 ft/ft³

For Class A cement, the slurry volume (yield) is 1.18 ft³/sack of cement

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For cement plug calculation in open hole and across perforations, 20% excess cement is used.

Example: # of sacks = $\frac{\text{bottom of plug} - \text{top of plug}}{1.18 \text{ ft}^3/\text{sack} \times 2.9565 \text{ ft}/\text{ft}^3} \times 1.2$

For cement plug calculation inside 5-1/2 casing and weight 15.5#:

Example: # of sacks = $\frac{\text{bottom of plug} - \text{top of plug}}{1.18 \text{ ft}^3/\text{sacks} \times 7.483 \text{ ft}/\text{ft}^3}$

Provide a well bore diagram of the well as constructed, and a post-plugging diagram showing location of cement plugs.

Include a detailed plugging cost estimate from an independent contractor which is broken down to include costs of cement, labor, rig time, materials, etc.

Attachment F. Financial Assurance (40 CFR § 144.52)

Submit evidence of financial resources, such as a surety bond or financial statement, necessary for a third party to close, plug, or abandon the well in the event an owner or operator is unable to do so. The monetary amount is based on the P&A plan cost estimate provided in Attachment E.

Attachment G. Site Security and Manifest Requirements (Commercial Wells Only)

Provide a proposed site security plan. This could include fencing around the perimeter of the facility. Consult with the regional EPA office for additional guidance on manifest requirements.

Attachment H. Aquifer Exemptions (40 CFR §§ 144.7 & 146.4)

If an aquifer exemption (AE) is requested, submit the information required at 40 CFR § 144.7 and to demonstrate that the criteria found at 40 CFR § 146.4 are met. Consult with your regional EPA office for additional guidance.

Attachment I. Existing EPA Permits (40 CFR § 144.31)

Submit a listing of all permits or construction approvals received or applied for under any of the following programs:

- Hazardous Waste Management program under RCRA,
- UIC program under SDWA,
- NPDES program under CWA,
- Prevention of Significant Deterioration (PSD) program under the Clean Air Act,
- Nonattainment program under the Clean Air Act,
- National Emission Standards for Hazardous Pollutants (NESHAPS) preconstruction approval under the Clean Air Act,
- Ocean dumping permits under the Marine Protection Research and Sanctuaries Act,
- Dredge and fill permits under section 404 of CWA, and
- Other relevant environmental permits, including State permits.

Attachment J. Description of Business (40 CFR § 144.31)

Provide a brief description of the nature of the business.

Attachment K. Optional Additional Project Information (40 CFR § 144.4)

The following is a list of Federal laws that may apply prior to the issuance of permits. When any of these laws are applicable, EPA must ensure that they are followed. The optional additional information requested below will assist EPA in its analyses to satisfy these laws.

- The Wild and Scenic Rivers Act, 16 U.S.C. 1273 et seq.

Identify any national wild and scenic river that may be impacted by the activities associated with the proposed project.

- The National Historic Preservation Act of 1966, 16 U.S.C. 470 et seq.

Identify properties listed or eligible for listing in the National Register of Historic Places that may be affected by the activities associated with the proposed project. If previous historic and cultural resource survey(s) have been conducted, provide the results of the survey(s).

- The Endangered Species Act, 16 U.S.C. 1531 et seq.

Identify any endangered or threatened species that may be affected by the activities associated with the proposed project. If a previous endangered or threatened species survey has been conducted, provide the results of the survey.

- The Coastal Zone Management Act, 16 U.S.C. 1451 et seq.

Identify any coastal zones that may be affected by the activities associated with the proposed project.