UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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MEMORANDUM

SUBJECT: Regulation Interpretation Related to Proper Completion and Proper Plugging and Abandonment

FROM: Thomas E. Belk, Chief Thomas E. Belk
Ground Water Protection Branch (WH-550)

TO: Water Supply Branch/Section Chiefs
UIC Representatives
Regions I - X

Two questions have been raised relative to proper completion and proper plugging and abandonment.

Questions:

1. What does proper plugging and abandonment or proper completion mean?

2. Does this apply to all classes of wells?

The answers to these questions are:

1. When an operator makes an application for a permit, he must submit adequate information to the Director to show that all wells within the area of review (which penetrate the injection horizon) are completed or plugged and abandoned in such a way as to prevent the flow of fluids into or between USDWs. In the case of Class II wells, the Director may not require the operator to submit the information. In such cases, the Director must make a finding based on his records that all wells are properly plugged and abandoned or properly completed to prevent the flow of fluids into or between USDWs. In no instance is the operator relieved of the responsibility of taking the necessary action to prevent endangerment of USDWs through improperly completed or improperly plugged and abandoned wells.

2. This applies to all Class I, II and III wells.

Cites:

1. 40 CFR §144.55 Corrective Action

2. 40 CFR §146.3 Definitions "Plugging" and "Plugging Record"

3. 40 CFR Vol.46 No. 96 May 19, 1981 (§1425 Guidance)
   - 5.6(b)(4) plugging and abandonment
   - 5.6(b)(5) area of review

For further information, please contact me at FTS 382-5530.