

FILE

FEB 11 1985

MEMORANDUM

SUBJECT: File Review

FROM: John B. Atcheson, Chief
Criteria & Standards Section/UICB

TO: UIC Section Chiefs
Region I - X

Attached is the guidance on File Review per your request.
It was included in a memo sent to the Regions in August 1984
titled "FY 1985 SPMS Commitments."
Attachment

ATTACHMENT D

FILE REVIEW

ing of the UIC program it was envisioned that would be permitted. The States and industry including existing enhanced recovery wells would be authorized. Thus, enhanced recovery wells may be authorized for life for UIC program purposes in both implementation programs. After the passage of the Safe Drinking Water Act, States applying the rule fully argued the effectiveness of rule authorized disposal wells. Thus, for UIC purposes, disposal wells in primacy States and Osage authorized by rule.

and authorization by rule was to reduce the permit costs involved in issuing a permit. However, States require that Class II wells authorized by rule must meet most of the same requirements as wells authorized by permit. The most significant exception is the "new" requirement. Beyond that, wells authorized by rule may not endanger USDWs and must meet the same siting, design, construction, operation and maintenance requirements.

to ensure that rule authorized Class II wells are authorized should be subjected to a thorough review at least every five years. File review means that the Director must review data on every existing Class II well to ensure compliance. (See Sec. 144.22):

is completed below the lowermost USDW and there is an adequate confining zone separating the well from that USDW;

is designed for the expected use and geologic conditions;

is cased and cemented to prevent the flow of fluids into or between USDWs;

is operated at an appropriate pressure and has adequate controls to prevent fracturing of the confining zone;

the owner/operator is maintaining appropriate records, assurance and plugging and abandonment procedures;

the operator is monitoring and reporting as required.

File reviews can be but do not necessarily have to be performed in conjunction with mechanical integrity tests.

While each well must be in compliance with the applicable requirements, it should be possible to do the file reviews, or at least certain aspects of them, on a field or project basis. For example, if there is assurance that all wells in a field were constructed according to the same specifications it should be possible to review the construction practice once rather than for each well individually.

Information for the reviews can be collected in various ways. In most cases, the necessary data should be available from State files. In direct implementation States, Regions should make arrangements to obtain or have access to the State files. If the State files are not available or are not complete, information can be gathered as part of a field trip to inspect the well and review the owner/operator's records. Both we and the States also have the authority to require the owner/operator to submit certain information.

File reviews are potentially a big undertaking and there are options for getting them done. To make sure that we all get started in a sensible direction, I think each Region should develop a strategy for conducting the file reviews within a five-year period in each DI program. Furthermore, primacy States should be asked to prepare such strategies also. I would like to review these strategies and will, therefore, request that you submit them as part of your DI workplans by September 15, 1984.