

Region V Casing and Cementing Policy For Substandard Class II Injection Wells

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION V

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Subject: Region V Casing and Cementing Policy For Substandard Class II Injection Wells: Region Guidance #1

From: Charles H. Sutfin, Director, Water Division

Policy Statement:

Upon initial review, and without any supporting documentation to the contrary, any well which does not have sufficient cement to isolate and protect USDWs¹ will be considered to have substandard construction. Upon this consideration, EPA will require squeeze cementing to isolate injection zones and USDWs pursuant to 40 CFR 146.22(b).

A waiver of construction requirements for substandard wells will be allowed only in those cases where substantial evidence is provided by the applicant to demonstrate the lack of potential for fluid migration into or between USDWs.

In requesting a waiver of the above requirement, the burden of proof for protection of USDWs is on the operator. The operator will be required to supply sufficient information to allow an adequate technical review to be performed. The information that must be provided must include, but is not limited to:

- 1) Information on all USDWs penetrated by the injection well (i.e., depth, thickness, lithology, name of formation, TDS content, hydrostatic pressure, lateral continuity, etc.); and
- 2) Noise logs, temperature logs or other tests approved by the Director such as a cement bond log, accompanied by a report by a professional log analyst or qualified consultant stating what conclusion, if any, was reached (i.e., no fluid movement, fluid movement or test inconclusive).

Where the cementing standard is to be waived, the permit writer must prepare a detailed justification in the Statement of Basis, utilizing the information provided by the operator.

Where remedial cementing is to be required, the permit writer must prepare a remedial action plan, stating the actions that the permittee must take in order to come into compliance with this policy.

When data submitted is inconclusive, the permit writer's decision should reflect the more conservative approach.

¹ USDWs – “Underground sources of drinking water”, as defined in Title 40 of the Code of Federal Regulations, Section 144.3.