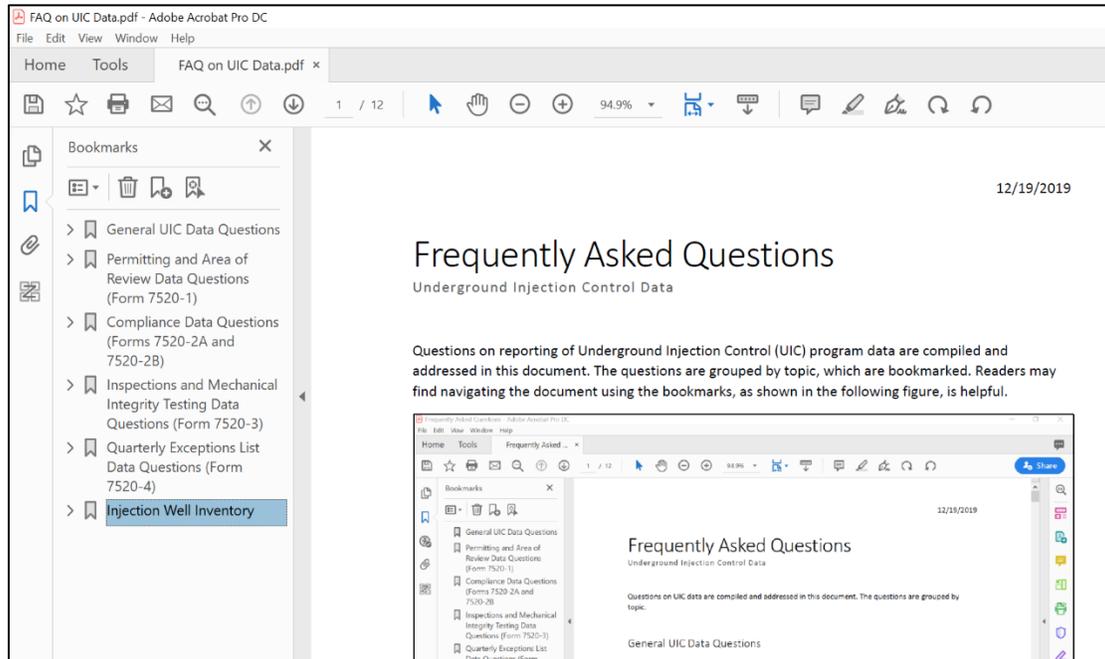


Frequently Asked Questions

Underground Injection Control Data

Questions on reporting of Underground Injection Control (UIC) program data are compiled and addressed in this document. The questions are grouped by topic, which are bookmarked. Readers may find navigating the document using the bookmarks, as shown in the following figure, is helpful.



General UIC Data Questions

How can Underground Injection Control staff access the UIC Data Application?

The UIC Data Application is found at <https://uicdata.epa.gov>. EPA staff who need access to the UIC Data Application may request an account by emailing uicdatacollection@epa.gov. Privacy program staff should follow the [instructions](https://www.epa.gov/uic/resources-transition-new-uic-data-reporting-process) found at <https://www.epa.gov/uic/resources-transition-new-uic-data-reporting-process> to request access.

How frequently should the Form 7520-1 through 7520-4 be reported to EPA?

Primacy programs should report the 7520-4 form quarterly to the EPA Regions based on the federal fiscal year, October 1 through September 30. The Regions will forward the second quarter and fourth quarter 7520-4 forms to Headquarters. The 7520 forms should be submitted using the UIC Data Application at <https://uicdata.epa.gov>.

EPA Headquarters suggests that primacy programs report data to the appropriate EPA Region during April 1 through May 15 (mid-year reporting; 7520-2A, -2B, and -4) and October 1 through November 15 (end-of-year reporting; 7520-1, -2A, -2B, -3, and -4). If the primacy program and EPA Region negotiate alternative reporting deadlines, then the primacy program should meet the alternative deadlines. The EPA Regions are expected to review both the state primacy data and the direct implementation data and send all the forms to Headquarters by July 1 (mid-year) and January 1 (end-of-year).

When should programs use zero to report information on the Form 7520?

The Form 7520 accepts zero (0), not applicable (“NA”), or unknown (“U”) as values that indicate lack of information for a field or section. Programs should use zero if the program has primacy for a particular injection well class and there are no injection wells affected or no activities to be reported at a particular field of the Form 7520. An example of appropriate reporting of zero might include the following:

- zero percent of MIT violations resolved in 90 days (7520-2A Section IX) if violations occurred and the violations were unresolved within 90 days of occurrence;
- zero number of injection wells returned to compliance (7520-2A Section VII, 7520-2B Section VII) if violations occurred and the wells were not returned to compliance within the reporting period; or
- zero Class IV/Endangering Class V injection well closures (7520-2B Section IX) if the program has primacy for Class IV or V well classes and no closures occurred.

When should programs use “NA” to report information on the Form 7520?

Programs should report not applicable (“NA”) if the field or section of the 7520 form is not applicable to the submitter. Specific examples where reporting “NA” would be appropriate might include the following:

- Fields for an injection well class that the program does not oversee. (The UIC Data Application is designed so that agencies can only edit the injection wells classes for which EPA approved primacy. The need to report “NA” for this situation is eliminated in the UIC Data Application.)
- Fields for an injection well class that the program has banned.
- Fields for an injection well class that the program regulates but currently has no well inventory.
- Percent of MIT violations resolved in 90 days (7520-2A Section IX) if no violations occurred within the reporting period.

- Number of injection wells returned to compliance (7520-2A Section VII, 7520-2B Section VII) if no violations occurred.

When should programs use “U” to report information on the Form 7520?

Programs should enter unknown (“U”) on the Form 7520 if the information is unknown or not captured by the program. If programs respond with “U” in a field, an explanation is required in the “Remarks/Ad Hoc Report” section found at the bottom of each Form 7520 or in a separate report attached to the Form 7520. Programs should indicate why the information is not collected and specify the injection well classes to which the comment applies.

Permitting and Area of Review Data Questions (Form 7520-1)

Where should programs report the number of renewal injection well permit applications on the Form 7520-1?

Renewal injection well permit applications may be reported on the Form 7520-1 Section V. “Number of Permit Applications Received.”

Where should programs report injection well permit modifications that are denied or withdrawn on the Form 7520-1?

Major modifications to injection well permits that are denied by the UIC program or withdrawn by an operator should be reported on Form 7520-1 Section VI.D. “Number of Permits Denied/Withdrawn.” The denial of a permit modification should be reported as a permit determination only after a complete technical review.

Form 7520-1 requests injection well permit application information on both new and existing injection wells. How should programs differentiate between new and existing injection wells?

The differentiation between new and existing injection wells is based on the primacy effective date of the specific program and a well’s status when the program received primacy. New injection wells are those wells that began injection operations after the program’s primacy effective date. Existing injection wells began injection operations prior to the program’s primacy effective date.

Some programs permitted all existing injection wells after primacy, in which case the program would only report permits issued for new wells in the future. If existing injection wells were rule-authorized at primacy and the program chose to permit existing wells at a later time, then the program would report permits issued to existing wells during the reporting period when the permits are issued.

Where can Underground Injection Control (UIC) programs find their primacy effective date?

A table of state and tribal programs with primary enforcement authority, or primacy, for the UIC program and primacy effective dates is found on the EPA UIC website at

<https://www.epa.gov/uic/underground-injection-control-primacy-status-states-territories-and-tribes>.

If an injection well's status was proposed or under construction on the primacy effective date of a program, would the well be considered new or existing?

The instructions on the Form 7520-1 describe a "new injection well" as any injection well that began operation after the effective date of the EPA or primacy program Underground Injection Control Program. If an injection well status was proposed or under construction at the time of primacy, then the well was not operational and should be considered "new" for purposes of reporting on the Form 7520-1.

If an injection well's status was temporarily abandoned or shut in on the primacy effective date of a program and the well becomes operational again after the primacy effective date, would the well be considered existing?

Yes, if an injection well was operational prior to the primacy effective date of a program and becomes operational again after the primacy effective date, the well would be considered "existing."

A primacy program issues an injection well permit for a production well that was constructed before the effective date of the primacy program. Is the injection well considered an existing well because it was constructed before the primacy effective date or a new well because it is entering the UIC program after the primacy effective date?

The well is considered "new" because the primacy program issued a permit to begin injection operations after the primacy program's effective date. The definition of "new" well is based on whether injection operations began relative to the primacy program's effective date.

If an injection well permit was issued two years ago, and the well was constructed yesterday, when do programs enter the information on the 7520-1? What if the injection well was permitted but never constructed?

Programs should enter data into the 7520-1 Section VI. A. field during the fiscal year that the injection permit was issued. The permit being issued is independent of when or if the injection well was constructed.

On Form 7520-1 Section V., does the field, “Number of Permit Applications Received,” include applications to add injection wells to an existing area permit?

If an owner/operator requests the program to add wells to an area permit that was previously issued, then the program may report the addition on the 7520-1 Section V. “Number of Permit Applications Received” field. The program should also report the number of wells added to the permit on 7520-1 Section VI.C. “Number of Wells in Area Permits”.

On Form 7520-1 Section V, does the field, “Number of Permit Applications Received,” include applications for major injection well permit modifications?

Yes, applications for major injection well permit modifications may be included in the field, “Number of Permit Applications Received.” Approved modifications may also be reported on 7520-1 Section VI.E. “Number of Major Permit Modifications Approved.”

On Form 7520-1 Section VI.A, B, and C, would injection wells that were previously authorized by rule and issued permits be reported under a new or existing area permit?

An “existing well field” contains only injection wells that were in existence on the primacy effective date of the UIC program. If the area permit includes wells that existed before the primacy effective date and new wells that began operation after the primacy effective date, then the well field would be a “new well field” for 7520-1 Section VI. B. “Number of Area Permits Issued”.

Any existing injection wells added to the area permit—such as those initially authorized by rule and then issued permits during the fiscal year—would be recorded at 7520-1 Section VI. C as an existing injection well. Any production wells that are converted to injection for the first time after the primacy effective date of the program would be considered “new” wells. If the production wells operated as injection wells at any time prior to the primacy effective date, then the wells would be considered “existing.”

On Form 7520-1 Section VII. “Permit File Review”, the instructions for “Wells Deficient” indicate that rule-authorized Class II injection wells that were found deficient and received corrective action should be reported. What does “and received corrective action” mean? Is it a notice from the UIC program to the operator that the well needs corrective action or that the corrective action was taken?

A complete technical review of a rule-authorized Class II injection well’s record may be conducted to determine whether a well is complying with UIC regulatory requirements. The well file review may include an evaluation of siting reports, wells in the area of review, construction, operating, monitoring, or other reports. The file review concludes when the well compliance status is determined.

The number of rule-authorized Class II wells that received a file review should be reported on Form 7520-1 Section VII. “Number of Rule-Authorized Class II Wells Reviewed – Wells Reviewed” field. If any wells are found to be “deficient,” report deficient wells in 7520-1 Section VII.

“Number of Rule-Authorized Class II Wells Reviewed – Wells Deficient” after the file review concludes and corrective action is completed.

In some cases, data may be reported in field “Number of Rule-Authorized Class II Wells Reviewed – Wells Reviewed” in an earlier fiscal year than “Number of Rule-Authorized Class II Wells Reviewed – Wells Deficient” because deficient wells are reported after corrective action concludes.

A program identified a well in an area of review as needing corrective action (C/A) during the fiscal year and the C/A was performed in a later fiscal year. How should a program report the data on Form 7520-1?

The program may report data in Section VIII. of the Form 7520-1 at different points in the file review and C/A process:

- Report the number of wells reviewed in the 7520-1 Section VIII.A. “Number of Wells in Area of Review.” The program should identify the reviewed wells as either abandoned or “other.” “Abandoned” includes any well penetrating the injection zone in the area of review that has been properly or improperly plugged and/or abandoned. “Other” includes any producing well, operable injection well, dry hole, exploratory well, etc. that penetrates the injection zone in the area of review.
- If wells in the area of review need C/A and are not yet returned to compliance, report the wells in the 7520-1 Section VIII. B. “Number of Wells Identified for Corrective Action” field. The program should identify whether the wells that need C/A are abandoned or other wells.
- If C/A was completed on any wells found in the area of review, the program should report the type of C/A under the Section VIII.C. “Wells with C/A.”

On 7520-1 Section VIII. C. “Wells with C/A,” the field names identify types of injection wells in the area of review (AOR) that have received corrective action (C/A). Do programs count the wells that had C/A taken in the fiscal year but were identified for C/A in a previous fiscal year?

Yes, when corrective action (C/A) is completed, the program would report the data in 7520-1 Section VIII. C. “Wells with C/A” section. Programs may report the wells identified for C/A (Section VIII.B) and wells with C/A completed (Section VIII.C) in different fiscal years.

Compliance Data Questions (Forms 7520-2A and 7520-2B)

Why are the data fields on the Form 7520-2A and 7520-2B so similar?

Form 7520-2A requests information on violations and enforcement actions for wells found to be out of compliance with the UIC regulations. Form 7520-2B requests information on a specific category of non-compliant wells—wells in significant noncompliance status. The data on 7520-2B is a subset of the data on 7520-2A.

For more information on significant noncompliance, please see the instructions on the [Form 7520-2B](https://www.epa.gov/uic/underground-injection-control-reporting-forms-state-summary-information) found at <https://www.epa.gov/uic/underground-injection-control-reporting-forms-state-summary-information>.

What range of dates should Underground Injection Control (UIC) programs consider for reporting the percentage of mechanical integrity test (MIT) violations resolved within 90 days on Form 7520-2A Section IX?

The 7520-2A Section IX field, “Percent of MIT Violations Resolved in 90 Days,” requires date of the MIT violation and the date the injection well is returned to compliance to calculate the percent. For mid-year reporting (second quarter of the federal fiscal year), violation dates considered should be within the range July 1 of the previous fiscal year through March 31 of the current fiscal year. Violations occurring within 90 days of the end of the federal fiscal year should be reported for the following federal fiscal year. For end-of-year reporting, violation dates considered should be within the range July 1 of the previous fiscal year through June 30 of the current fiscal year. The return to compliance date must be within 90 days of the violation date to be reported.

To calculate the percent of MIT violations resolved in 90 days, the UIC program should count the total number of MIT violations that occurred in the reporting period and count the number of violations resolved within 90 days of the violation and within the reporting period. The number of violations resolved within 90 days should be divided by the total number of MIT violations and multiplied by 100. The calculation is shown in the following equation:

$$\frac{\text{violations resolved within 90 days}}{\text{total number of violations}} \times 100$$

An Excel spreadsheet is available to UIC staff to assist in the calculation needed to report the percent of MIT violations resolved within 90 days. The spreadsheet may be downloaded from the launch page of the UIC Data Application (<https://uicdata.epa.gov>) or from the EPA website at <https://www.epa.gov/uic/compliance-reporting-requirements-injection-well-owners-and-operators-and-state-regulatory>.

The following table illustrates several examples of MIT violations resolved within 90 days of the violation and the appropriate reporting period to include the data on the 7520-2A Section IX.

Examples of appropriate reporting of mechanical integrity violations resolved in 90 days on Form 7520-2A Section IX.

VIOLATION DATE	RETURN TO COMPLIANCE DATE	REPORTING PERIOD TO INCLUDE DATA ON 7520-2A SECTION IX
July 31, 2017	October 2, 2017	2 nd quarter 2018 4 th quarter 2018
July 15, 2017	September 15, 2017	2 nd quarter 2018 4 th quarter 2018
January 3, 2017	March 1, 2017	2 nd quarter 2017 4 th quarter 2017
February 15, 2017	April 5, 2017	4 th quarter 2017

An administrative order was issued to an injection well operator. Four injection wells are included in the administrative order—two Class IID injection wells and two Class IIR injection wells. How would the data be recorded on the Form 7520-2A?

The number of injection wells with enforcement actions (7520-2A Section VI.A.) should be reported as two Class IID and two Class IIR wells. The administrative order could be reported in two ways:

- A. Report one administrative order in 7520-2A Section VI.B.3. as EITHER IID or IIR well class, which will reflect less accurate on the injection well classes with enforcement actions, or
- B. Report one administrative order in 7520-2A Section VI.B.3 as BOTH IID or IIR, which will inflate the number of AOs but accurately reflect the injection well classes with enforcement actions

The reporting inaccuracy may be avoided if the UIC program issues separate administrative orders for separate classes of wells.

What types of Underground Injection Control violations are considered significant non-compliance?

Significant non-compliance violations (SNCs) are violations that endanger or pose a significant potential to endanger underground sources of drinking water (USDW). The SNC violations also include violations that are not addressed after enforcement actions.

The types of SNC violations differ by injection well class. For Class I injection wells, the following violations are considered SNC:

- Contamination of a USDW
- Injection of unauthorized fluid
- Injection into unauthorized zones
- Failure to cease injection after loss of mechanical integrity is detected
- Failure to comply with corrective action requirements
- Failure to operate automatic shutdown system
- Failure to operate automatic warning system
- Unauthorized plugging and abandonment
- Violation of a formal order
- Knowing submission of false information
- Violations involving loss of mechanical integrity
- Violations of maximum injection pressure
- Failure to install and/or operate injection pressure and annulus pressure monitoring systems or other monitoring systems, required by permit or rule
- Failure to maintain required annulus pressure
- Any Class I well with a non-SNC violation that is noted three times within 12 months of the first violation. This type of SNC should be reported as “other SNC violations” (7520-2B Section V.B.7) unless the violation is clearly another type of violation found in 7520-2B Section V.B.

The following violations should be considered SNC for Class II, III, or V wells:

- Any unauthorized emplacement of fluids where formal authorization is required
- Well operation without mechanical integrity, which causes the movement of fluid outside the authorized zone, if injection of such fluid may have the potential for endangering a USDW
- Well operation at an injection pressure that exceeds the permitted or authorized injection pressure and cause the movement of fluid outside the authorized zone of injection, if injection of such fluid may have the potential for endangering a USDW
- The plugging and abandonment of an injection well in an unauthorized manner when there is endangerment of a USDW and there is an identifiable owner/operator
- Any violation of a formal enforcement action, including an administrative or judicial order, consent agreement, judgment, or equivalent action
- The knowing submission or use of any false information in a permit application, periodic report, or special request for information about a well
- Other violations that are considered SNC by the primacy agency

Any violation for a Class IV well is considered a SNC violation.

On Form 7520-2A Section VIII. and 7520-2B Section VIII., the field “Number of Cases of Alleged Contamination of a USDW” appears. Are these fields the same thing?

The “Alleged Contamination” fields on the 7520-2A and 7520-2B are related but not the same. The “Alleged Contamination” fields are related because the significant non-compliance violations reported on Form 7520-2B are a subset of violations reported on Form 7520-2A. The alleged contamination cases on the Form 7520-2A include alleged cases for both non-SNC and SNC violations. The alleged contamination cases reported on Form 7520-2B are related only to SNCs.

In the UIC Data Application, the Section VII. “Wells Returned to Compliance” fields on the Forms 7520-2A and -2B represent wells returned to compliance at the second and fourth quarter of the federal fiscal year. Given that the form is only submitted two quarters out of the year, how will EPA receive information about activities occurring during the first and third quarters of the federal fiscal year?

All reporting on the Form 7520 is cumulative over the fiscal year. Mid-year reporting includes activities that occurred between October 1 and March 31 (the first and second fiscal year quarters). End of year reporting includes activities that occurred between October 1 and September 30 (all fiscal year quarters).

The UIC Data Application is missing one of the fields on the Forms 7520-2A and -2B Section VII that allows programs to report the number of wells returned to compliance during a quarterly or annual reporting period. How will EPA interpret the reporting period for the data?

The hardcopy Forms 7520-2A and 7520-2B contain two fields on each form for reporting the number of wells returned to compliance: one field for “this quarter,” meant for mid-year

reporting, and one field for “this year,” meant for end of year reporting. The new UIC Data Application contains only one field for reporting the number of wells returned to compliance because the Application includes a field for the program to report the fiscal year quarter that the data is being reported. The fiscal year quarter field allows EPA to differentiate the time period for the number of wells returned to compliance without having separate fields for midyear and end of year reporting like the Form 7520.

Inspections and Mechanical Integrity Testing Data Questions (Form 7520-3)

An operator conducted a mechanical integrity test (MIT) on a well prior to receiving authorization to inject. Should the MIT be reported on 7520-3 Section V.B.1. “Number of Mechanical Integrity Tests (MIT) Witnessed” or V.B.3. “Number of Well Constructions Witnessed”?

The program should report the MIT on Form 7520-3 Section V.B.1. “Number of Mechanical Integrity Tests (MIT) Witnessed.”

If a well fails a mechanical integrity test (MIT) and then passes the subsequent MIT, does the program report the tests in both the pass and fail fields on Form 7520-3 Section VI.C. and VI.D.?

Yes, the program would report tests that both pass and fail, even on the same well, in the “Well Passed” and “Well Failed” fields on 7520-3 Section VI.C. and VI.D.

Multiple types of mechanical integrity tests (MIT) are performed on a single injection well. Should the program report the individual MIT separately on the Form 7520-3?

Yes, the program should report all the types of MIT performed on injection wells during the reporting period on Form 7520-3 Section VI.C. and VI.D. If any wells received a complete, two-part MIT that included testing for significant leaks and fluid migration, then the program should report the wells on Form 7520-3 Section VI.A. “Number of Wells Tested or Evaluated for Mechanical Integrity (MI)” and VI.B. (Number of Rule-Authorized Wells Tested/Evaluated for MI)” as appropriate.

If a rule-authorized injection well receives a complete, two-part mechanical integrity test (MIT), should the program report the well on Form 7520-3 Section VI.A and VI.B?

Yes, rule-authorized injection wells that receive a complete, two-part MIT should be reported on Form 7520-3 Sections VI.A. and VI.B. Form 7520-3 Section VI.A. requests the number of wells tested or evaluated for mechanical integrity, regardless of whether the injection well was authorized by rule or by permit. Form 7520-3 Section VI.B. requests only the number of rule-authorized wells tested or evaluated for mechanical integrity.

A well failed a mechanical integrity test and may have contaminated an underground source of drinking water as a result. The program has not yet been able to determine if contamination occurred. Should the program report the possible contamination of the USDW on the 7520-2A Section VIII. “Number of Cases of Alleged Contamination of a USDW” field?

If the program has evidence that contamination occurred due to the mechanical integrity loss, but not enough evidence to establish proof, the program may report the possible contamination on the 7520-2A Section VIII. in the same fiscal year as the event occurred.

Programs should report only the number of wells that received complete, two-part mechanical integrity tests on Form 7520-3 Section VI.A. How should a program report all the one-part MITs that are performed?

Section VI.A. of the 7520-3 requests programs to submit the total number of wells that had a complete MIT during the fiscal year. A complete MIT is composed of two tests:

- A test for significant leaks in the casing, tubing, or packer. The tests may be referred to as Part One or internal MIT. The types of tests that determine significant leaks include annulus pressure monitoring record evaluations, casing or tubing pressure tests, and monitoring record evaluations among others.
- A test for significant fluid migration into an underground source of drinking water through vertical channels adjacent to the well bore. The tests may be referred to as Part Two or external MIT. The types of tests that determine fluid migration include, but are not limited to, cement record evaluations, temperature or noise log tests, radioactive tracer or cement bond tests.

Programs should report the specific types of MITs on Form 7520-3 Sections VI.C. and D. If wells have not received a complete, two-part MIT, the program should still report individual MITs (e.g. annulus pressure test, cement bond tests) in Section VI.C. and D as appropriate.

A well failed an annulus pressure test for mechanical integrity. After the packer was resealed, the well passed the mechanical integrity test. Should the well be reported on the 7520-3 as a mechanical integrity test failure?

Test results that indicate loss of mechanical integrity should be reported on the 7520-3 as a mechanical integrity test failure.

Quarterly Exceptions List Data Questions (Form 7520-4)

When should an injection well be reported on the Form 7520-4 Quarterly Exceptions List?

The form 7520-4 collects information on injection wells with significant non-compliance (SNC) violations. Once the SNC violation is identified, the primacy program is expected to issue a formal enforcement action within 90 days unless the well is back in compliance. The well should

be included on the 7520-4 if, by the end of the second calendar quarter after the SNC violation is identified, the well is still not in compliance and the primacy program has not initiated formal enforcement to correct the violation. If SNC violations are on the path to compliance (i.e., incorporated into an issued formal enforcement action) or returned to compliance, within two calendar quarters, they are not reported on the 7520-4.

Once a well has been reported on the Quarterly Exceptions List it remains there until it returns to compliance. This is true even if the primacy program issues a formal enforcement action after the well has become an exception. This means that some wells could remain on the exceptions list for a long time as some enforcement actions can take years. All enforcement actions taken after the well has been placed on the Quarterly Exception List are tracked and the well remains on the list through the quarter during which it returned to compliance or a civil or criminal case has been filed by the State Attorney General or the Department of Justice (i.e., it is beyond EPA's jurisdiction).

Does EPA want the owner's mailing address or the facility address on the Form 7520-4 Section III?

The name and address of the primary contact of the well is reported on Section III of the 7520-4. The primacy contact address may be different than the address of the facility or well.

Injection Well Inventory

How frequently is injection well inventory reported to EPA?

Programs should report injection well inventory on a federal fiscal year basis. Inventory is reported by programs between October 1 and November 15 for any injection wells with the following status between October 1 and September 30 of the previous fiscal year: active, under construction, temporarily abandoned or inactive, or proposed.

What operational status should injection wells have to be included in inventory reported to EPA?

Injection wells with the following operating status should be included in inventory reported to EPA: active, under construction, proposed, or temporarily abandoned. Inventory should be submitted through the UIC Data Application.