

Overview: 2019 Updates to the Owner and/or Operator Reporting Forms

The sections below describe the changes EPA made to each of the owner or operator reporting forms. These changes fall into three categories:

- Deletions of fields that request information that can be reported in other ways or that already exists in the permit record.
- Significant changes that reflect EPA's recognition of how information is generated or collected by well owners or operators or that allow submittal of documents generated as a customary business practice. These changes reduce owner or operator time spent on repackaging information solely for the purpose of reporting.
- Minor changes that: clarify or better define what EPA needs, provide continuity across all submittals over the duration of a project, or streamline the reporting of common information.

7520-6: Permit Application

The permit application form is completed by applicants seeking UIC permits; it is primarily used by owners or operators of Class I, Class II, and Class III wells, although prospective owners or operators of some technically complex Class V wells may apply for UIC permits in limited cases. EPA made the following changes to the permit application form:

- Deleted three fields, including: legal contact, number of existing wells, and number of wells per type.
- Implemented two changes that clarify the information needed regarding ownership type and commercial facilities. EPA also made minor clarifications to reduce the need for double entry of contact information, reference a list of available SIC codes, and clarify the information requested related to well status and latitude/longitude.
- Created separate permit application forms and instructions tailored to each class of injection well. EPA also significantly clarified the instructions for the attachments to the permit application form. The revised instructions are organized to facilitate completing the required attachments. For example, all of the information related to specific topics (e.g., AoR and corrective action, site geology, well construction, or testing and monitoring) is presented together to improve understanding. The instructions also expand on and clarify the information EPA is requesting of each well class. These changes will help permit applicants improve the quality of their submittals and potentially reduce the need for revisions/corrections to the permit application, which will ultimately save burden and the total time needed to complete the application process.

7520-7: Application to Transfer Permit/Ownership

This form, which may be submitted by Class I, II, and III well owners or operators occasionally during the permit term, ensures that the Director has current information on who owns/operates the well. EPA made the following changes to this form:

- Deleted six fields that are not relevant to processing the ownership transfer, including: name/address of surface owner; a graphical depiction of the township, range, and section of the well location; well status; type of permit; number of wells; and lease number.
- Clarified what is requested in the well activity field.
- Developed instructions to clarify the information requested.

7520-8: Quarterly Injection Well Monitoring Report

The Injection Well Monitoring Report must be submitted by owners or operators of non-Class II wells (primarily Class I and III wells) quarterly during injection operations. It provides information to demonstrate that the well is operating in compliance with the UIC permit and has mechanical integrity or to provide early indication of USDW endangerment. EPA made the following changes to the quarterly monitoring report:

- Clarified the monthly total volume and yearly cumulative volume injected fields to better align to how injection well owners or operators record this information. Because each of these items is reported for each of three months, this equates to 6 significant clarifications to the form.
- Clarified that reporting of minimum, average, and maximum temperature and minimum, average, and maximum pH need only be reported if these are specified in the UIC permit. Because each of these parameters is reported for each of three months, this equates to 18 significant clarifications.
- Developed instructions that describe and clarify the information to be reported.

7520-11: Annual Class II Disposal/Injection Well Monitoring Report

Owners or operators of Class II wells must submit annual monitoring reports to demonstrate that the well is operating as planned and has mechanical integrity or provide early indication of USDW endangerment. EPA made the following changes to the annual monitoring report:

- Deleted name/address of surface owner; township, range, and section depiction; type of permit; and number of wells.
- Deleted average injection pressure and minimum injection pressure; because both of these parameters are reported for each month of the year, this equates to 24 deletions from the form.
- Clarified that reporting the tubing-casing annulus pressure is required only if it is specified in the UIC permit; because this is reported for each month of the year, this equates to 12 changes to the form.
- Clarified what must be reported for well activity and lease name.
- Provided instructions that describe or clarify the information to be reported.

7520-16: Inventory of Injection Wells

The inventory form is submitted by owners or operators of Class V wells before the well is constructed to provide basic information about the well (in lieu of a permit application) to ensure that the Director is aware of the existence of the well. EPA made the following changes to the inventory form:

- Deleted four fields that are not critical to maintaining the injection well inventory including: transaction type, numeric county code, facility ID, and ownership.
- Changed the format to facilitate data entry of the requested information about the facility and the legal contact.
- Clarified the instructions for entering latitude and longitude information.

7520-17: Pre-Closure Notification Form

Class V well owners or operators submit a pre-closure notification form before plugging their well to demonstrate to the Director that the well will be plugged in a manner that will not allow it to become a conduit for fluid movement that could endanger USDWs.

This form was developed in 1999 in connection with an effort to use “plain English” and make the reporting requirements as brief and clear as possible. Therefore, the pre-closure notification form presented limited need for clarification. EPA made the following changes to the pre-closure notification form:

- Deleted the name of preparer field.
- Changed the format to facilitate data entry of the requested information about the facility and the owner or operator.
- Clarified what must be reported regarding the well’s construction.

7520-18: Completion Report for Injection Wells

The well completion form, which must be submitted following construction or conversion of a well, provides information to verify that the well was constructed as planned in order to ensure that injected fluids will remain within the identified injection zone.

As part of the burden reduction effort, EPA merged the former Completion Form for Injection Wells (Form 7520-9) with the Completion Report for Brine Disposal, Hydrocarbon Storage, or Enhanced Recovery (Form 7520-10) into a significantly streamlined form that allows owners or operators to submit limited information on the form and attach contractor/service company reports or similar documents that are developed as a customary business practice.

- For Class II well owners or operators (who submit 97 percent of all completion reports), this reduced the number of fields that were previously on Form 7520-10 from 39 fields to 22 fields. These owners or operators will no longer need to record: the name/address of the surface owner; township, range, and section depiction; type of permit; number of wells; well activity; lease name; anticipated daily injection pressure; type of injected fluid; casing and tubing information (i.e., outside diameter, weight, depth); stimulation

information (i.e., interval treated, materials used); wireline log types and intervals logged; and cement information (i.e., sacks and class of cement, and the depth and diameter of the borehole cemented).

- Other owners or operators who previously reported on Form 7520-9 no longer need to report: name/address of owner or operator, facility address, well status, well activity, type of permit, number of wells, or lease number. Because Form 7520-9 already requested limited information, fewer deletions were needed to streamline the form.

Additionally, EPA:

- Clarified six fields on the previous Form 7520-10 and two of the fields that were on Form 7520-9.
- Clarified the instructions (particularly those for Class II well owners or operators) to help owners or operators improve the quality of their submittals so that multiple revisions/corrections are not needed, which will ultimately save burden.

7520-19: Well Rework, Plugging & Abandonment Plan, or Plugging & Abandonment Affidavit

A Plugging and Abandonment Plan must be submitted with a Class I, II, or III permit application to provide information to demonstrate that the well will be plugged in a manner that will not allow it to become a conduit for fluid movement. Following closure of the well, a report is submitted to document the procedures followed. Additionally, owners or operators may occasionally need to submit information on well reworks during the permit term so the Director can ensure that well maintenance activities will be conducted in a manner that will not compromise the integrity of the well.

EPA merged the former Well Rework Record (Form 7520-12) and Plugging and Abandonment Plan (Form 7520-14) to streamline the information reported and afford burden savings where owners or operators can update previously submitted information and attach reports that are developed as a customary business practice and that could be interpreted more easily. EPA also developed instructions for the form to clarify the information needed and reduce confusion.

To reduce the burden associated with submitting information about well reworking that was previously reported on Form 7520-12, EPA:

- Deleted six fields, including: name/address of contractor; the graphical depiction of the township, range, and section of the well location; total depth before rework; total depth after rework; type of permit; and number of wells.
- Simplified the reporting of technical information by allowing owners or operators to submit contractor/service company reports or similar documents in lieu of entering the information on the form. This change eliminates burdensome data entry of information about: casing record before rework (i.e., casing size and depth, cement sacks and type, top and bottom of perforations, and treatment record); casing record after rework (i.e., casing size and depth, cement sacks and type, top and bottom of perforations, and treatment record); rework operations; and wireline log information (type and intervals).
- Clarified what must be reported regarding the well type and well identifying information.

To reduce the burden associated with reporting on well plugging and abandonment that was previously submitted on Form 7520-14, EPA:

- Deleted five fields, including: name/address of owner or operator, well location depiction, lease name, type of authorization, and number of wells.
- Eliminated data entry of technical information related to: casing and tubing record after plugging (i.e., size, weight, put in well, left in well, hole size); method of plug emplacement; cementing information (i.e., size of hole or pipe, depth to bottom of tubing or pipe, sacks of cement, slurry volume, calculated top of plug, measured top of plug, slurry weight, and type of cement); and information on open hole and/or perforated intervals. Other significant burden reduction changes are provided by no longer requiring the owner or operator to enter information about Class II subtypes or the cost estimate on the form.
- Clarified what must be reported regarding the locational and well identifying information.