

Kansas Class II UIC Peer Review

Commission Business Meeting October 22, 2020
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About GWPC

- Ground Water Protection Council
 - Chartered in 1983.
 - 501(c)6 non-profit.
 - Members include state environmental protection, UIC agencies, source water, ground water, and oil and gas regulatory agencies.
 - 20 Board Members from the 10 EPA Regions.

Timeline and Process

- First review conducted in 1990.
- April 2019.
- July 2019.
- September 2019.
 - Review Team.
 - Five members – four observers.
 - Participating Staff.
 - Nine Conservation Division Staff participants.
- Final Report published September 2020.
 - <http://www.gwpc.org/sites/default/files/Kansas%20Peer%20Review%20Final%20September%202020.pdf>

Executive Summary Strengths

- The Division's ability to utilize flex time, approve overtime and shift inspectors from within a District to cover critical operations such as MITs, well construction and well plugging is commendable.
- The Class II program staff is dedicated, knowledgeable, experienced, and demonstrates a high degree of technical competency.
- To the extent resources allow, the permitting and field witnessing programs have focused on the most critical programmatic elements such as casing installation and cementing and mechanical integrity testing of wells.

Executive Summary Strengths

- Through an ongoing review process, the Division has promulgated updates to the rules and regulations which have enhanced the UIC program.
- To supplement the UIC program, the Division has actively prioritized, decentralized to the district office level, and accelerated the abandoned well plugging efforts.

Executive Summary Suggestions

- The review team strongly suggests the Division consider reviewing with the KCC Advisory Committee the current financial assurance program. This may include:
 - Modifying the current licensing system to establish full time individual and blanket bonds that are maintained through the lifecycle of the well; and
 - Evaluating the cost of Class II well plugging and abandonment and setting bonding amounts consistent with these costs; and
 - Surveying the bonding requirements in other states as a means of assisting the Division in establishing a financial assurance system that is consistent (where appropriate) with other states' primacy programs.

Executive Summary Suggestions

- The review team suggests continued emphasis be placed on updating KOLAR and the Risk Based Data Management System (RBDMS) to fully incorporate all UIC activities including field inspections, permitting, well testing and reporting.
- The review team suggests the division consider requiring new or newly converted Class II wells have a Cement Bond Log (CBL) and where possible a CBL and Variable Density Log (VDL) run to assure proper cementing bonding on both the casing and the formation.

Executive Summary Suggestions

- The Division should continue to work with the KGS and the KDHE on a plan for the division to acquire and use all seismic data held by KGS and KDHE regardless of its source to assure proper seismic monitoring relative to potential induced seismicity. This may need to include a means of assuring that privately owned seismic data can be confidentially held by the division. A Memorandum of Agreement (MOA) involving the three agencies might be a possible mechanism to achieve this goal.

Thank You.

