

Section V – Plan for Each Well

UMCES-AL Report recommendations 1-A, 3-A, 4-B

For each well, the applicant for a drilling permit shall prepare and submit to MDE, as part of the application, a plan for construction and operation that meets or exceeds the standards and/or individual planning requirements for Engineering, Design and Environmental Controls set forth in Section VI. In preparing the plan, the applicant shall consider API Standards and Guidance Documents, and, if the plan fails to follow a normative element of a relevant API standard, the plan must explain why and demonstrate that the plan is at least as protective as the normative element. The plan must address, at a minimum,

1. Completing the Environmental Assessment

This effort includes all environmental assessment baseline monitoring and site characterization required as a prerequisite for issuing individual well permits. These are activities that would be initiated after the CGDP has been approved and require site-specific, field scale assessment and monitoring.

2. Constructing the pad, containment structures, access roads and other ancillary facilities
3. Method of providing power to equipment
4. Acquisition of water
5. Evaluation of potential flow zones
6. Identification and evaluation of shallow and deep hazards
7. Pore pressure/fracture gradient/drilling fluid weight
8. Monitoring and maintaining wellbore stability
9. Addressing lost circulation
10. Casing
11. Cementing
12. Drilling fluids
13. Wellbore hydraulics
14. Barrier design
15. Integrity and pressure testing
16. Blow out protection
17. Contingency planning
18. Communications plan, including communication with contractors and subcontractors
19. Site security

20. Storage, treatment and disposal of water, wastewater, fuel and chemicals
21. Road construction and transportation planning
22. Spill prevention, control and countermeasures, and emergency response
23. Invasive species
24. Waste handling, treatment and disposal
25. Monitoring the well during production to detect well problems and failure of casing or cement
26. Reclamation

Consistent with UMCES-AL recommendation 4-B, the applicant will be required to notify the owners of any drinking water well within 2,500 feet that an application has been filed.

A suggestion has been made by some Commissioners that there be a formal process by which other State and local government agencies could review and comment on the application for an individual well permit. Because interagency issues will relate principally to the location of the well pad, access roads, pipelines and other infrastructure, review by other State and local government agencies would be more appropriate and effective at the time of the CGDP, not the individual well permit. The Departments recommend that the appropriate staff from specific agencies be invited to participate in the CGDP development. The Departments plan to address coordination with local government agencies on specific topics, such as transportation planning and emergency response, through the standards set out in Section VI.