TOP ENERGY AVE
OFFICE OF CONSERVATION

CLASS V STRAT TEST WELL PERMIT APPLICATION

OFFICE OF CONSERVATION INJECTION & MINING DIVISION 617 N. Third St., 9th FLOOR BATON ROUGE, LA 70802

> Injection-Mining@la.gov (225) 342-5515

UIC-25 STRAT TEST	PLEASE REAL	PLEASE READ APPLICATION PROCEDURES						TYPE ONLY		
1. APPLICATION TYPE: (Check One)										
D DRILL AND COMPLETE NEW CLASS V WE	MPLETE NEW CLASS V WELL IN CLA									
OTHER (SPECIFY):										
2. IDENTIFY WELL USE										
3. IDENTIFY FUTURE WELL USE (i.e. Conversi	on to Class VI, m	onitor w	vell, P&A, e	tc.)						
4. OWNER/OPERATOR NAME					5.	. OC O	PERATOR CODE			
6. OWNER/OPERATOR MAILING ADDRESS			7. CITY, STATE, ZIP CODE							
8. TELEPHONE NO	9. E-M	MAIL ADDRESS								
10. WELL NAME	11. WE	WELL NO 12. WELL SERIAL NO (Well Co			ell Conver	versions Only)				
13. FIELD NAME						14. FIELD	CODE			
15. PARISH NAME			16. SECTION 17. TOWN			HIP 18. RANGE				
19. LOCATION COORDINATES (GCS, NAD 27)	20. STATE PLANE COORDINATES (LAMBERT, NAD 27)									
LATITUDE: ° MIN	SEC	SEC 🗆 N				OUTH ZON	IE			
LONGITUDE: ° MIN	SEC		x :	ά: Υ:						
21. LIST PERMITS, LICENSES, OR APPROVAL APPLICANT'S LEGAL OR TECHNICAL ABILITY APPLICATIONS OR, IF ISSUED, THE IDENTIFIC	S THE APPLICANT TO CARRY OUT TI ATION NUMBER	r has ri He prof Of the	ECEIVED OR POSED ACT PERMIT, LI	APPLIED FOR W VITY. INCLUDE II CENSE, OR OTHEI	HICH SP DENTIFI R APPR(ECIFICALLY CATION N DVALS.	Y AFFE UMBE	CT THE R OF		
Regulatory Program or Agency				Permits, Licenses, Construction, Project Approval Identification						

22. WELL CA	SING / CEME	ENT DATA												
CASING SIZE	HOLE DIAMETER CASING WEIGHT			TOTAL	ТҮРЕ		YIELD							
(OD- INCHES)	(INCHES)	(LB/FT)	CASING GRADE	TOP	BOTTOM	SACKS	(Lead/Tail) (Le	ad/Tail)	(Lead/Tail)	r) (JEMENT TOP		
23. BASE OF	USDW (FT):				·	24. ELEVATION OF DATUM (FT):								
REFERENCE E-LOG (SERIAL NUMBER):														
25. WELL TO	5. WELL TOTAL DEPTH (FT): 26. PLUGBACK DEPTH (FT): 2					7. TUBING SIZE & DEPTH: 28. PACKER SIZE & DEP					k DEPT	Ή:		
INJECTIVITY TEST INFORMATION (IF APPLICABLE)														
29. INJECTION ZONE DEPTHS 30. COMPLETION/PERFORATION DEPTHS														
Тор:		E	Bottom:			Тор:		Bot	tom:					
31. WELL CO	OMPLETION		🗖 OPEN	HOLE	🗖 PER	FORATIONS		SCREEN						
32. TEST M/	ATERIAL (e.g	. nitrogen,	brine, etc):	33. MAXIMU	JM TEST F	RESSURE (psi):	34	34. TOTAL INJECTION VOLUME (bbls):						
CO2 is pro	ohibited as a	Class V test r	material											
35. Is the Well Located on Indian Lands or Other Lands Owned by or under the Jurisdiction or Protection of the Federal Government?														
36. Is the Well Located on State Water Bottoms or Other Lands Owned by or under the Jurisdiction or Protection of the State of Louisiana?														
37. AGENT OR CONTACT AUTHORIZED TO ACT ON BEHALF OF THE APPLICANT DURING THE PROCESSING OF THIS APPLICATION														
NAME:														
COMPANY														
E-MAIL ADDRESS:														
38. CERTIF	ICATION BY	WELL OWN	ER/OPERATO	R										
I certify that of this applic the Office of accordance in this docur the informa of fine or im	as the owner cation, to subn Conservation with Office of nent and all at tion is true, a prisonment or	/operator of nit additional entry onto t Conservation tachments an ccurate, and both (LSA-R	the injection w l information as the property to a guidelines. I fund that based o l complete. I a .S. 30:17).	rell, the perso requested, ar inspect the in urther certify t n my inquiry c m aware tha	n identified nd to give o jection wel under pena of those ind t there are	d in Item No. 37 a ral statements in s I and related appu Ity of law that I ha ividuals immediat significant penal	bove is auti support of t irtenances a ve examine ely respons ties for sub	norized to his applica as per LSA d and am ible for ob mitting fal	act on m tion. 1 w -R.S. 30:4 familiar v otaining f se inform	ny behalf du ill grant an a 4. I agree to with the info the informa nation, inclu	ring the outhoria operat rmatio tion, I ding th	e processing zed agent of e the well in n submitted believe that e possibility		
Print Name of Well Owner/Operator Print Title of Company Official (as applicable)														
Signature of Well Owner/Operator					1		Date							

I. SUBMIT THE FOLLOWING AS A COMPLETE APPLICATION PACKAGE FOR A CLASS V WELL:

- Application Fee: Submit the non-refundable application fee for each well per LAC 43:XIX.Chapter 7.
- One Form UIC-25 STRAT TEST with original signature. Please use the following designations depending upon which Office of Conservation district the well is to be located in (click <u>here</u> to see the district outlines):
 - 1. WILDCAT-SO LA LAFAYETTE DIST (9727)
 - 2. WILDACT-NO LA SHREVEPORT DIST (9715)
 - 3. WILDCAT-NO LA MONROE DIST (9709)
- Two original Form MD-10-R-A for each existing well to be converted (if conversion is proposed);
- ATTACHMENT 1 One original Certified Location Plat showing the location of each Class V well location;
 - 1. Please be sure to comply with the requirements of the IMD-GS-10 Policy
- ATTACHMENT 2 An annotated copy of an electric well log of the nearest offset well that shows the Underground Source of Drinking Water (USDW);
 - 1. Conduct a one-mile search from the proposed well location to locate the closest well with an e-log that shows the lowermost USDW. The USDW can be determined from the deep induction curve on the e-log. Resistivity changes with temperature and depth, therefore the guidelines below are used to approximate the lowermost USDW in sands at the following depths:
 - a. Ground surface to 1,000 feet: 3 ohms or higher is considered USDW;
 - b. 1,000 feet to 2,000 feet: 2 ½ ohms or higher is considered USDW; and
 - c. 2,000 feet and deeper: 2 ohms or higher is considered USDW.
 - 2. Clay or shale intervals with resistivity values higher than these are not considered USDW.
- **ATTACHMENT 3** An annotated copy of an electric well log of the nearest offset well that shows the proposed injection zone (if injection is proposed);
- ATTACHMENT 4 Schematic(s) of the Class-V well showing:
 - 1. Casing diameter, specifications, material (PVC, steel, etc.), and depth,
 - 2. Screen type, length, material, slot or opening size,
 - 3. Injection tubing size inside casing (if any),
 - 4. Hole diameter (bit size),
 - 5. Amount and type of cement used and depths to top and bottom of cement,
 - 6. Wellhead showing all fittings,
 - 7. Discharge line diameter and connection to wellhead,
 - Well house (if any).
 Schematics should be stamped and signed by a Louisiana-registered Professional Engineer (PE) as appropriate
- ATTACHMENT 5 Work prognosis for drilling, completing, and testing the well;
- ATTACHMENT 6 Financial surety will be required for Class V per LAC.XIX.104.C.5. Bonding costs will be the estimated cost for the
 actual plugging and abandonment (P&A) of the well.
 - 1. Please provide a P&A procedure, schematic, and third party cost estimate
 - 2. The acceptance of the P&A procedure will not constitute approval to P&A the well to those standards and will be only used to verify the third party estimate.
- ATTACHMENT 7 IT Questions Documentation. See Section III below.
- ATTACHMENT 8 Laboratory analysis of injection test fluid from a LELAP accredited laboratory (if injection is proposed). The laboratory analysis must be a signed original from a LDEQ LELAP accredited laboratory. A list of laboratories accredited by LDEQ can be found <u>here</u>. The analysis sheet(s) must, at a minimum, include measurements of chlorides (mg/l), total dissolved solids (mg/l), pH, specific gravity, and temperature of the fluid sample when specific gravity was measured.

II. REQUIREMENTS OF A PERMIT APPLICATION FOR CLASS-V INJECTION WELL:

Operating a Class-V well without a permit is a violation of Statewide Order No. 29-N-1 (LAC 43:XVII, Subpart 1) and may
subject the well owner to enforcement action including fines as provided by La. R.S. 30. No fines will be imposed on the owner
of an existing unpermitted injection well provided the owner submits an application for a permit. However, repairing,
stimulating, plugging or performing other work on a Class V well without a work permit (Form UIC-17) may subject the well
owner to a fine.

- After completing the Class V well, a permanent, weather-proof sign not less than 1 foot by 2-foot in size must be erected within ten feet of the well, which, at a minimum shows the Well Name and Office of Conservation issued Well Serial Number. If the Class V well is enclosed within a well house, the sign may be inside the well house, if it is prominently visible upon entering.
- After completing the Class V well, complete and submit the Form UIC-42 STRAT TEST.
- When abandoning, the well must be plugged in accordance with Office of Conservation guidelines in effect at the time of abandonment.

The Injection & Mining Division can be reached by telephone at 225-342-5515 or email <u>Injection-Mining@la.gov</u>. Please submit the completed application form with all required attachments to:

Mailing Address

Office of Conservation Injection & Mining Division 617 N. Third St., 9th Floor Baton Rouge, LA 70802

III. CONSTITUTIONAL CONSIDERATIONS: "IT DECISION" QUESTIONS:

Louisiana Constitutional Article IX, §1, of the Louisiana Constitution imposes a duty of environmental protection on all State agencies and officials which require a balancing process in which environmental costs and benefits must be given careful consideration along with economic, social and other factors. The balancing process was required of State agencies by Save Ourselves, Inc., et al. vs, the Louisiana Environmental Control Commission, et al. 452 So.2d 1152 (La. 1984), hereafter "IT Decision".

The "IT Decision" involved a hazardous waste permit under the State's Hazardous Waste Management Plan consistent with the federal Resource Conservation and Recovery Act (RCRA). To meet its obligation under the "IT Decision", the Louisiana Department of Environmental Quality (LDEQ) prepared a list of questions which addresses what LDEQ deemed necessary to make permit decisions. The main questions touch upon certain issues and considerations which would be applicable to Office of Conservation waste permit decisions, although we are not administering a RCRA authorized program.

In order to satisfy the constitutional requirements, the Office of Conservation must conduct the "balancing process" utilizing the information and data which will form part of the record supporting the decision on your application to permit your proposed activity. As the applicant for an injection well permit, it is necessary for you to provide such information as will be required to evaluate your application considering the "IT Decision". We suggest your staff review the court case to determine what information you believe must be provided.

You must furnish this Office with such information in adequate detail together with sufficient justification and supporting data to allow us to fulfill our constitutional obligation. Your furnishing of this information is above and beyond the requirements of Statewide Order No. 29-N-1 (LAC 43:XVII, Subpart 1). As such, your permit application prepared pursuant to that Statewide Order is not considered deficient because of these overriding constitutional requirements. Your prompt response to the "IT Decision" questions is in your best interest. If we cannot satisfactorily address our constitutional obligations we may be unable to grant your application.

- Have the potential and real adverse environmental effects of the proposed facility been avoided to the maximum extent possible?
- Does a cost benefit analysis of the environmental impact costs balanced against the social and economic benefits of the proposed facility demonstrate that the later outweighs the former?
- Are there alternative projects which would offer more protection to the environment than the proposed facility without unduly curtailing non-environmental benefits?
- Are there alternative sites which would offer more protection to the environment than the proposed facility site without unduly curtailing non-environmental benefits?
- Are there mitigating measures which would offer more protection to the environment, than the facility as proposed, without unduly curtailing non-environmental benefits?