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State of Louisiana
DEPARTMENT OF NATURAL RESOURCES
OFFICE OF CONSERVATION

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SECRETARY

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INJECTION AND MINING DIVISION

INTRA-OFFICE GUIDANCE STATEMENT

GUIDANCE STATEMENT: IMD-GS-13

EFFECTIVE DATE: November 30, 2022

SUBJECT: Fluid Analysis Requirements for Class II Salt Water Disposal (SWD) and Enhanced Recovery (EOR) Wells.

BACKGROUND:

The Injection and Mining Division (IMD) of the Louisiana Office of Conservation regulates Class II injection wells for salt water disposal (SWD) and enhanced recovery (EOR) projects under LAC 43:XIX, Subpart 1 (Statewide Order No. 29-B). To protect the underground sources of drinking water (USDW), IMD determines the maximum authorized surface injection pressure (MASIP) for injection wells. In order to properly calculate a well's MASIP, the density of the injected fluid must be known. Therefore, this Office requires a representative sample of the injection fluid from the source well(s), to be analyzed by a [Louisiana Department of Environmental Quality \(LDEQ\) Louisiana Environmental Laboratory Accreditation Program \(LELAP\)](#) accredited laboratory, and submitted to IMD.

APPLICABILITY:

Pursuant to LAC 43:XIX.405.B.4.d, a qualitative and quantitative analysis of representative sample of water to be injected must be submitted as part of the application for a new SWD or EOR well. As such, the Commissioner may require the submittal of a new fluid analysis for the following reasons:

- 1) A fluid analysis by a LELAP accredited laboratory has not been received by IMD;
- 2) An outdated or otherwise non-representative fluid sample was used to calculate the well's MASIP;
- 3) The well has transferred ownership or is in the process of changing the Operator of Record;
- 4) A previous analysis is inconsistent with field data; or
- 5) Any other reason deemed by the Commissioner to be necessary for protection of the USDW and the health, safety, and welfare of the public.


REQUIREMENTS:

Requirements for the submission of a fluid analysis are as follows:

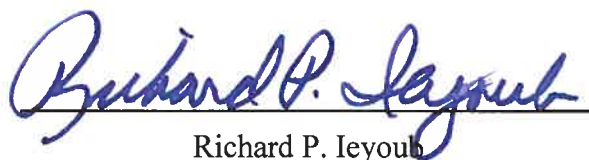
- 1) An Injection Fluid Source List including each well that will contribute fluid to the injection well.
- 2) A laboratory analysis of a representative sample of the fluid to be injected into the SWD or EOR well. The laboratory analysis must be signed, original documents from a LDEQ [LELAP](#) accredited laboratory. The analysis sheet(s) must indicate the source of the fluid sample and at a minimum include the measurements listed below:
 - A) Chlorides (mg/l);
 - B) Total dissolved solids (mg/l);
 - C) pH;
 - D) Specific gravity; and
 - E) Temperature of fluid sample when specific gravity was measured
- 3) The Sample Name or Sample ID on the chain of custody must identify the location point where the fluid sample was collected and must correlate to a well(s) on the Injection Fluid Source List.
- 4) If the sample location is a tank battery or common collection point, then a signed written statement will be needed to associate the fluid source well(s) with the sample location.

If the injection well is not being utilized and the operator of record does not intend to bring the well back into service within six (6) months of the fluid analysis request, the operator must submit a signed statement to IMD outlining future intent for the injection well.

Per LAC 43:XIX.411.B, a permit granting underground injection may be modified, revoked and reissued, or terminated during its term for cause at the initiative of the commissioner.

APPROVED BY:

Stephen H. Lee, Director
Injection & Mining Division



Richard P. Ieyoub
Commissioner of Conservation

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