SUPPLEMENTARY INFORMATION:

INFORMATION COLLECTION REQUEST
FOR THE
UNDERGROUND INJECTION CONTROL PROGRAM

OMB Control No. 2040-0042
EPA ICR No. 0370.21

Draft

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TABLE OF CONTENTS

LIST OF EXHIBITS

LIST OF APPENDICES

1. Identification of the Information Collection

1(a) Title and Number of the Information Collection

Underground Injection Control Program Information
OMB #2040-0042

1(b) Short Characterization

The information collected upon extension of the approval of this Information Collection Request (ICR) will be used by the U.S. Environmental Protection Agency (EPA) for the monitoring and enforcement of the Underground Injection Control (UIC) Program, authorized by the Safe Drinking Water Act (SDWA). The purpose of the UIC Program is to establish a federal-state regulatory system to ensure that actual or potential underground sources of drinking water (USDWs) are not endangered by the underground injection of fluids.

Monitoring and enforcement are primarily achieved through initial, quarterly, and annual reporting requirements. Information is gathered both at the state program level and at the regional level. Each Region has the role of implementing UIC programs for states that do not have UIC programs.[1] In addition, each Region must compile and submit information to EPA Headquarters from all respective UIC programs. This information is submitted in summary reports to EPA Headquarters.

Section 144.6 of 40 CFR describes the five injection well types (see Exhibit 2-1). EPA collects monitoring data and test results from operators of Class I, II, and III injection wells. Class IV wells are banned—except for wells used to re-inject treated contaminated ground water into the same formation from which it was drawn as part of a clean-up authorized by the Resource Conservation and Recovery Act (RCRA) or Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA); operators of these wells must submit plugging and abandonment reports as they are closed. EPA requires operators of existing Class V motor vehicle waste disposal wells (MVWDWs) in ground water protection areas or other state-defined sensitive ground water areas to close these wells or apply for a permit to continue injecting. (If a state or Region fails to identify these areas within the time frames specified in the Rule, these requirements apply to all wells state-wide.) In general, Class V operators submit only a small subset of the information required of Class I, II, and III well operators.

Primacy agencies are also respondents in this information collection. EPA collects summary information on permits, compliance and enforcement, inspections, mechanical integrity testing, and inventory for all well classes from permitting authorities in primacy states.

[1] Primary enforcement responsibility (primacy) is vested in states that have UIC programs approved by EPA's Administrator. "Direct Implementation" (DI) refers to programs in states that are administered directly by EPA regional offices. In some states, more than one agency may oversee injection wells of various classes.

EPA estimates that, over the 3 years covered by this request, the total burden on underground injection well operators and Primacy agencies associated with UIC requirements will be 3,001,944 hours (an average of 1,000,648 hours per year), and the present value cost will be $418,896,572 (an average of $139,632,191 per year). The public reporting and recordkeeping burden for this collection of information is estimated to average 2.35 hours, or $328.04 per response annually. The burden *per respondent* is 25.77 hours; the cost *per respondent* is $3,596.54.

2. Need For and Use of the Collection

This Section describes EPA's need for the information collected pursuant to this ICR and the EPA Regions' and Headquarters' use of the collected data. Section 2(a) demonstrates both the need and legal authority for information collection. Need is demonstrated by describing the potential for contamination of USDWs and the statutory requirements that justify information collection to prevent contamination. Legal authority is demonstrated by identifying laws and regulations related to waste disposal, injection wells, and the UIC Program. Section 2(b) describes the practical utility and the users of the information; it focuses on how data are used to accomplish program objectives and manage programs at each level of implementation.

2(a) Need/Authority for the Collection

Potential for Contamination

The fundamental purpose of the UIC Program is to prevent the contamination of current and potential USDWs by keeping injected fluids within the well and the intended injection zone. There are five major pathways by which injected fluids can migrate into USDWs. The following discussion describes each pathway and summarizes information collection requirements to monitor for migration through the pathway.

Pathway 1: Faulty Well Construction. Contamination through this pathway is caused by leaks in the well casing or fluid forced upward between the well's outer casing and the well bore. For this reason, the absence of significant leaks and fluid movement in the well bore must be demonstrated in the initial permit application, and every 5 years thereafter.

Pathway 2: Nearby Wells. Fluids from the pressurized area in the injection zone may be forced upward through wells in the area of injection. Wells that penetrate the injection area in the zone affected by this pressure must be properly constructed or plugged. For this reason, plans for plugging and abandonment are submitted with the permit application. In addition, DI programs require that plugging and abandonment reports be submitted if the operator abandons any well.

Pathway 3: Faults or Fractures in Confining Strata. Fluids may be forced upward out of the pressurized area through faults or fractures in the confining beds. Activities to address this contamination pathway are tracked using two information collection requirements. First, permit information is reviewed to ensure that wells are sited such that they inject below a confining bed that is free of known open faults or fractures. Second, injection pressures are monitored so that fractures are not propagated in the injection zone or initiated in the confining bed zone.

Pathway 4: Direct Injection. Class IV wells, which inject into or above USDWs and have a high potential to endanger human health, are illegal. The exception is wells that are used in a RCRA/CERCLA-authorized ground water remediation project. Most Class V wells inject nonhazardous fluids into or above formations that contain USDWs. These include, but are not limited to, motor vehicle waste disposal wells, cesspools, agricultural drainage wells, storm water drainage wells, industrial drainage wells, and untreated sewage waste disposal wells. In a regulatory effort to address the Class V wells that pose the greatest threat, EPA has banned the construction of new large-capacity cesspools and requires operators of existing large-capacity cesspools to close their wells. EPA also banned new motor vehicle waste disposal wells and is requiring operators of existing motor vehicle waste disposal wells in defined ground water protection areas or other sensitive ground water areas to close these wells or apply for a permit to continue injecting.

Pathway 5: Lateral Displacement. Fluid may be displaced from the injection zone into hydraulically connected USDWs. Permit information regarding the proximity of underground injection wells to USDWs is considered by the permitting authority in making a determination of whether the wells are properly sited. Well operators are required to control injection pressure and conduct monitoring and testing to track any lateral migration of fluids.

Legal Authority

Injection wells are regulated by EPA's Office of Ground Water and Drinking Water (OGWDW), as mandated by Sections 1421, 1422, 1423, 1425, 1431, 1445, and 1450 of the SDWA of 1974, as amended. The regulation of hazardous waste injection is jointly authorized by the SDWA and the Resource Conservation and Recovery Act (RCRA) of 1976. The Hazardous and Solid Waste Amendments (HSWA) of 1984 amended RCRA to prohibit the land disposal of hazardous waste unless it can be demonstrated that there will be no migration from the disposal unit for as long as the waste remains hazardous. Underground injection of hazardous wastes is included in Section 3004(k) of HSWA as a land disposal technique.

Under Section 1445 of the SDWA, persons subject to federal or state UIC programs must "establish and maintain such records, make such reports, conduct such monitoring, and provide

such information as the Administrator may reasonably require by regulation to assist him in establishing regulations under this title . . ."

The specific requirements for the UIC Program are established in the Code of Federal Regulations (CFR), Title 40, Sections 144 through 148 as follows:

Section 144 - Underground Injection Control Program. This section describes the general requirements of the Program, authorizes certain types of wells, defines permitting procedures, and establishes procedures for ensuring financial responsibility for proper closure of wells.

Section 145 - State UIC Program Requirements. This section describes the requirements that state programs must meet to gain primacy and the method for obtaining program approval.

Section 146 - UIC Program: Criteria and Standards. This section contains the technical criteria and standards that various classes of underground injection wells must meet. Monitoring and reporting criteria are outlined for each well class.

Section 147- State UIC Programs. This section describes the provisions of the UIC programs of individual states' and territories' primacy programs.

Section 148 - Hazardous Waste Injection Restrictions. This section identifies hazardous wastes that are restricted from disposal into Class I hazardous waste injection wells. It outlines the standards and procedures by which Class I hazardous waste facility operators may petition to dispose of restricted hazardous wastes.

These CFR Sections contain information collection requirements that are applicable to operators of underground injection wells and to administrators of primacy and DI programs. Exhibit 2-1 describes the five classes of injections wells. A summary of the specific requirements for operators is given in Exhibit 4-2, Operator Paperwork Requirements; the paperwork requirements for states as respondents are presented in Exhibit 4-3, State Reporting Forms.

Exhibit 2-1
Classification of Underground Injection Wells

Class I	Wells that inject industrial and municipal waste, including hazardous waste, beneath the lowermost formation containing a USDW.
Class II	Wells used to dispose of fluids which are brought to the surface in connection with oil or natural gas production; to inject fluids for enhanced recovery of oil or natural gas; or to store hydrocarbons.
Class III	Wells that inject fluids for the extraction of minerals including: mining of sulfur by the Frasch process; in situ production of uranium or other metals such as ore bodies that are not conventionally mined; and solution mining of salts or potash.
Class IV	Wells used by generators of hazardous waste or of radioactive waste, or by owners or operators of hazardous waste management facilities, to inject into or above strata that contain a USDW. These wells are banned, unless they are used to re-inject treated contaminated ground water into the formation from which it was drawn in a RCRA/CERCLA authorized cleanup.
Class V	Injection wells not included in Classes I, II, III, or IV. Typical examples include, but are not limited to: agricultural drainage wells, storm water drainage wells, industrial drainage wells, untreated sewage waste disposal wells, motor vehicle waste disposal wells, and cesspools.

Statutory Requirements

Section 1421(b) of the SDWA specifies that regulations for state UIC programs must contain minimum requirements for effective programs that prevent underground injection which endangers USDWs. Therefore, EPA must:

- Publish minimum national requirements for effective state UIC programs;
- List states that need UIC programs;
- Review proposed state programs and approve or disapprove them;
- Promulgate and enforce UIC programs in those states that choose not to participate in or do not develop and operate approved programs; and
- Evaluate state/regional UIC programs for effectiveness in meeting statutory and regulatory requirements.

In addition to these regulations, other rules are aimed at providing EPA with the information it needs to administer its program and to determine what new measures, if any, are necessary to achieve its statutory mandate.

2(b) Practical Utility/Users of the Data

EPA information users include regional and Headquarters staff/managers who make decisions regarding UIC regulations, compliance and enforcement actions, funding for state and regional UIC programs, and strategic and policy issues related to the mission of OGWDW and EPA. Primacy agents in states use the summary information reported on the 7520 forms[2] or an equivalent form to target inspection and enforcement activity, to establish permit terms and conditions, to track performance against demands, and to identify violations and assess their significance. In addition, the primacy agent can use the summary reports it supplies to EPA Headquarters to evaluate its own program activities, such as the number of mechanical integrity tests (MITs) witnessed, the number of inspections conducted, and the number of permits reviewed.

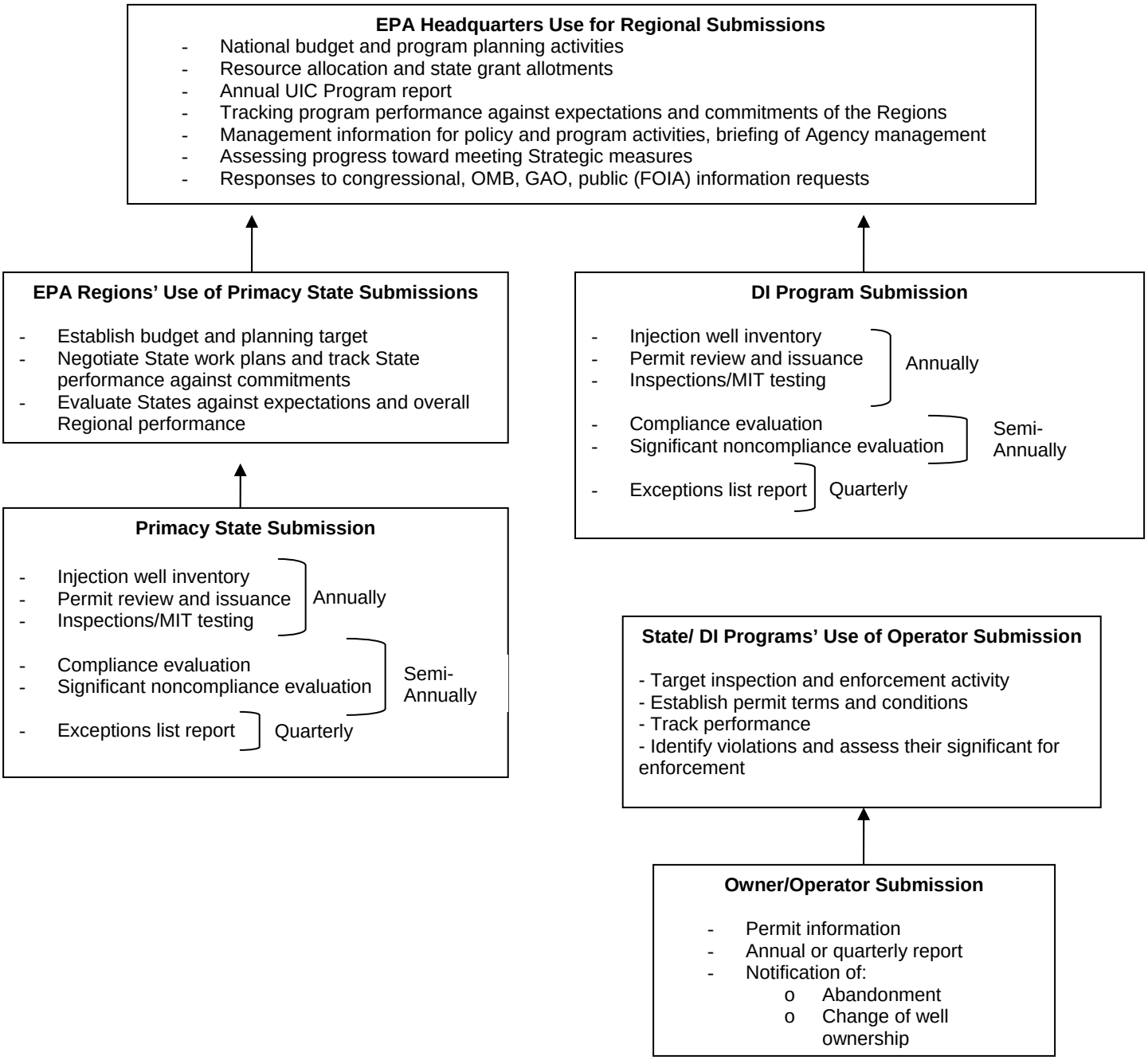
Exhibit 2-2 charts the flow of information from operators, states, and Regions to EPA Headquarters. Operators submit data to states (in primacy states), or to EPA regional offices (in DI states). Each primacy state in turn submits the data to its respective EPA regional office, which reviews the information and forwards it, along with data from its own DI states, to EPA Headquarters. All information in the quarterly, semi-annual, and annual reports received at EPA Headquarters is analyzed and stored. These reports are the only data available to EPA Headquarters to fulfill the UIC Program's needs and responsibilities. The following sections give a more detailed analysis of the uses made of the collected information.

Headquarters' Management of the National Program

EPA Headquarters uses reported information to respond to information requests and perform analyses for EPA management, the Office of Management and Budget (OMB), the General Accounting Office (GAO), Congress, and the public. Headquarters oversees primacy agents by using the reports to track, evaluate, and report on program performance. Performance targets and measures for EPA regional programs are established by EPA and tracked against Government Performance and Results Act (GPRA) goals. EPA tracks high priority activities that guide the Regions in carrying out UIC Program objectives. EPA negotiates with the Regions to obtain commitments for performance based on these guidelines.

[2] The 7520 forms are described in Exhibit 4-3.

Exhibit 2-2 UIC Program Information Flowchart



Additionally, EPA's 2003-2008 Strategic Plan contains a key Strategic Target that, "by 2008, 50% of source water areas (both surface and ground water) for community water systems, will achieve minimized risk to public health." EPA developed associated Program Activity Measures (PAMs) to assess progress toward the strategic goal, including four related to UIC:

- Percent of Class I, II, III, and V wells identified in violation or significant violation that are addressed by the UIC Program.
- Percent of identified Class V motor vehicle waste disposal wells that are closed or permitted.
- Percentage of Class I, II, and III wells that maintain mechanical integrity.
- Percent of ground water-based source water areas for community water systems with a completed Class V survey.

EPA has initiated an effort to collect data on the UIC Program that supports the PAMs through a new Web-based reporting process. This is described in Section 5(b).

EPA has also begun the development of a national UIC database. This effort is necessary because the Agency currently has no national well-level database that holds UIC inventory, compliance monitoring, violation, and enforcement information. A national database will serve the needs of Headquarters and various supporting programs in need of crucial UIC data. The database development effort is described in Section 5(b) and Appendix B.

In addition to its use for regional oversight purposes, state and regional information is also used to justify future program modifications. For example, the information collected may be used to determine if the requirements that pertain to rule-authorized wells or mechanical integrity testing are effective. State and regional data are used to support or inform these types of decisions.

Regional Oversight of Primacy Programs

The primary use of quarterly, semi-annual, and annual reports submitted to the Regions is to help the Regions oversee the performance of the primacy agents. The information is used to track individual state progress against commitments, and to ensure that state programs have the ability to take timely and appropriate action in response to direct threats to the public health due to contamination of USDWs.

Regions also have enforcement responsibilities and must use well specific information to track state enforcement response actions for all significant noncompliers (SNCs), i.e., operators of those injection wells that are most likely to contaminate USDWs. The statutory responsibility to initiate federal enforcement actions may be delegated to a Region if a primacy state does not fulfill its responsibilities.

Like EPA Headquarters, the Regions use the data to develop regional operating budgets and program plans, allocate resources, track state-by-state performance, and respond to inquiries. The Regions are responsible for reviewing and verifying the information on the quarterly reports before sending them to EPA Headquarters.

Direct Implementation of State Programs

In addition to their oversight responsibilities, EPA regional offices must implement the UIC Program in states without primacy. As administrators of UIC programs in DI states, EPA regional offices use information from operators in several ways.

First, initial permit application materials provide the information regional offices need to determine if proposed underground injection wells will be properly designed and sited to minimize the possibility of USDW contamination. The primary responsibility of a regional office is to use well information submitted prior to construction and during completion to ensure that injected fluids will remain in the selected injection zone and will not leak into areas that could result in contaminated USDWs.

Following permit approval and completion work, the permitting authority uses monitoring and testing reports submitted by operators to determine if (l) there is a leak in the casing, tubing, or packer, or (2) there is significant fluid movement into a USDW through vertical channels adjacent to the well bore.

Regional offices with DI authority also use information required of operators to focus efforts on injection wells in need of enforcement attention. Operators who have been out of compliance for at least two consecutive quarters are identified on the exceptions list.

3. Nonduplication, Consultations, and Other Collection Criteria

This Section discusses that EPA has no other means available to gather the requested information. It also describes EPA's solicitation of public comments in the Federal Register and Agency consultations in developing the burden and cost estimates; describes how less frequent reporting may endanger USDWs; and discusses Paperwork Reduction Act (PRA) general guidelines and provisions for confidentiality.

3(a) Nonduplication

Well-specific data obtained from operators of injection wells and the state reports that rely on such data comprise virtually all of the information covered by this ICR. To the best of the Agency's knowledge, this information is not required or collected by any other agency or regulation. The Department of Energy does collect information relating to production for enhanced recovery wells in its "Annual Report for Enhanced Oil Recovery (EOR) Incentive" (OMB Clearance No. 19054135). This information pertains only to oil production, and is related to but different from the information EPA uses to evaluate injection well operators. However, on a case-by-case basis, permitting authorities may use this information to supplement existing information on enhanced recovery wells.

Since both Class I hazardous and Class IV wells (now banned) involve the injection of hazardous wastes, there is potential overlap between UIC programs under the SDWA and hazardous waste regulations promulgated under RCRA. Historically, the regulations established provisions for RCRA interim status (Part A permit) [40 CFR 270.64] for Class I hazardous wells in states in which no UIC program had been approved or promulgated. The regulations allow the UIC permit to be issued in lieu of a Part B RCRA permit if the Class I hazardous waste well meets certain conditions specified in 40 CFR 270.64(c). Thus, although Class I hazardous waste wells are co-regulated under RCRA and the SDWA, there is no duplication of information collection between RCRA and the UIC Program.

3(b) Public Notice

EPA published a notice requesting comment on the burden and cost associated with the UIC Program reporting requirements in the Federal Register on February 28, 2007 (72 FR 8983). EPA received no comments on the burden and cost estimates. A copy of the Federal Register notice of this information collection is attached to this ICR as Appendix C.

3(c) Consultations

In developing burden and cost estimates and underlying assumptions, EPA consulted knowledgeable staff in the most active EPA regional offices and states in the UIC Program. Collectively, these offices are the permitting authorities for the majority of injection wells in

each well class. In some cases, these officials contacted operators or consultants in the states and regions to solicit input on operator burden and costs. These staff reviewed the burden and cost tables and recommended adjustments to some unit burden and non-labor costs. Their input is reflected in the burden and cost estimates in Section 6.

3(d) Effects of Less Frequent Collection

There are two types of respondents for whom efforts could be made to minimize burden: (1) operators of injection wells; and (2) primacy state agencies.

Operators

All Class I, II, and III operators are required to observe pressure, flow, and cumulative volume of injected wastes, and demonstrate mechanical integrity. Some operators must sample and analyze their injectate and conduct ambient monitoring. These requirements provide DI and state primacy programs with crucial information to assess whether injection wells pose a potential threat to USDWs. In developing the current monitoring and testing frequencies, EPA attempted to strike a balance between ensuring protection of USDWs and placing an excessive burden on operators.

The frequency at which operators must conduct various monitoring and testing activities varies with the potential for a particular well class to endanger USDWs. Less frequent monitoring and testing might allow injection wells to operate in a manner that could threaten or cause considerable damage to USDWs if evidence of such a situation were undiscovered for a long time. EPA has determined that the specified monitoring frequencies for each operators of well class are at the minimum protective frequency for the following reasons:

- State and DI programs use injectate pressure and volume data to ensure that the pressures caused by injection activities do not cause fractures to initiate in the confining zone. Less frequent monitoring would not provide the necessary data to ensure that injection does not initiate fractures in the confining zone or that injectate or formation fluids are not displaced into USDWs.

- MITs can reduce the amount of damage a well failure can cause to USDWs by detecting those failures. The degree to which this damage can be reduced depends on the frequency of MITs. Less frequent MITs would raise the potential for contamination of USDWs.

- Permitting authorities require that operators keep timely data on the chemical composition of operators' injectate to ensure that potentially incompatible injected substances will not come into contact with each other.

Injection well operating permits are renewed or reviewed at varying intervals (typically every 5 to 10 years, depending on the well class). This is necessary to provide permitting

authorities an opportunity to review facility operations to ensure that injection operations will not endanger USDWs.

State Primacy Agencies

EPA solicited input from state UIC Directors, operators, and other interested parties on revising the UIC Program to reduce burden. State officials suggested combining, simplifying, or eliminating some of the 7520 forms, or reducing the frequency at which primacy agents report this information to EPA.

3(e) General Guidelines

Two provisions of the UIC regulations exceed the PRA guideline for response time. Pursuant to 40 CFR 144.51(l) and 144.28(b), operators are required to report by phone within 24 hours and in writing within 5 days "any noncompliance which may endanger health or the environment." This is an emergency provision necessary to enable permitting authorities to take timely and appropriate steps to reduce or eliminate any potential threat to public health.

3(f) Confidentiality

Operators of injection wells may claim confidentiality, as provided in 40 CFR 144.5 *Confidentiality of Information.* If confidentiality is requested, the information is treated in accordance with the provisions of 40 CFR Part 2, *Public Information*. Any confidentiality claim must be made at the time of submission in the manner prescribed by the application form or its instructions. In the case of other submissions, respondents may claim confidentiality by stamping the words "confidential business information" on each page containing such information. Claims of confidentiality for the following information will be denied: the name and address of any permit applicant or permittee; and information regarding the existence, absence, or level of contaminants in drinking water.

If no claim of confidentiality is made at the time of submission, EPA may make the information available to the public without further notice. However, the information is collected for the Agency's internal use and there are no plans to routinely release or publish any of the data.

3(g) Sensitive Questions

There are no sensitive questions pertaining to this ICR.

4. Respondents and Information Requested

This Section identifies respondents affected by this information collection and describes the data items and activities required of operators, states, and DI programs.

4(a) Respondents/NAICS Codes

Operators of injection wells are identified by Standard Industrial Classification (SIC) and North American Industry Classification System (NAICS) codes. Operator respondents for underground injection wells are categorized by the industries that produce fluid wastes and the type of fluid injected into each well class. The SIC and NAICS codes for the operator respondents associated with each well class are listed in Exhibit 4-1.

The NAICS code for State agencies that include drinking water programs is 92411 (Administration of Air and Water Resources and Solid Waste Management Programs) or 92312 (Administration of Public Health Programs).

4(b) Information Requested

4(b)(1) Data Items, Including Recordkeeping, Required from Operators

Required data items vary according to well class and authorization category (permitted well vs. rule-authorized well). The information required of operators is listed in Exhibit 4-2.[3]

Initial Reporting Requirements

Two methods are available for obtaining approval for underground injection: rule authorization and permitting. Class II enhanced recovery (II-R) and hydrocarbon storage wells (II-H) in existence before the promulgation of specific permitting regulations are authorized by rule for life and do not require permits. All new Class I, II, and III wells require permits. New Class V wells may be rule-authorized, although some operators of Class V wells may be required to obtain permits. Operators of Class V MVWDWs in state-designated ground water protection areas or other sensitive areas that wish to continue operating must obtain a permit.

[3] The reporting requirements are based on existing UIC regulations as of October 2006. No specific UIC requirements or policies exist for operators of carbon dioxide geosequestration projects or drinking water treatment residuals disposal operations. If any such requirements are developed, future ICRs will include appropriate burden estimates.

Exhibit 4-1
Respondents' SIC/NAICS Codes*

UIC Class	SIC Code	NAICS Code (2002)	Description
I	■ Major Group 13 ■ Major Group 28 ■ Major Group 26 ■ Major Group 29 ■ Major Group 32 ■ Major Group 33 ■ Major Group 36 ■ Major Group 37 ■ Major Group 45 ■ Major Group 49 ■ Major Group 89 ■ Major Group 99	■ 211 ■ 325 ■ 322 ■ 324 ■ 327 ■ 331 ■ 335 ■ 336 ■ 481 ■ 221 ■ 54162 ■ 54169	■ Oil and Gas Extraction ■ Chemical Manufacturing ■ Paper Manufacturing ■ Petroleum and Coal Products Manufacturing ■ Nonmetallic Mineral Product Manufacturing ■ Primary Metal Manufacturing ■ Electrical Equipment, Appliance, & Component Mfg. ■ Transportation Equipment Manufacturing ■ Air Transportation ■ Utilities ■ Environmental Consulting Services ■ Other Scientific and Technical Consulting Services
II	■ 1311 ■ 1321 ■ 1381	■ 211111 ■ 211112 ■ 213111	■ Crude Petroleum and Natural Gas Extraction ■ Natural Gas Liquid Extraction ■ Drilling Oil and Gas Wells
III	■ Major Group 10 ■ Major Group 14	■ 212	■ Mining (except Oil and Gas)
IV	■ 4953	■ 562	■ Waste Management and Remediation Services
V	■ 01, 02, 074, 075 ■ 4789, 4953, 9511 ■ 7542 ■ 7033, 9111 ■ 4142, 4212, 4213, 4581, 5015, 5511, 5521, 5531, 5541, 7514, 7515, 7532, 7533, 7537, 7538, 7539, 7549, 9111	■ 111, 112, 54194, 11521 ■ 488999, 562213, 562219, 92411 ■ 811192 ■ 7212, 92111 ■ 441, 484, 485, 488, 562, 811, 44711, 44719, 45299, 48841, 92111, 532111, 532112	■ Agricultural or storm drainage wells ■ Domestic wastewater disposal wells ■ Car washes ■ Recreational vehicle parks and campsites, executive offices (e.g., state parks and campgrounds) ■ Bus charter services, trucking, airports, flying fields, and airport terminal services; motor vehicle parts; motor vehicle dealers; auto and home supply stores; gasoline service stations; passenger car rental or leasing; automotive repair and services; executive offices (e.g., town garages)

* Note: this list is not totally inclusive, but represents a large portion of the industries that operate injection wells.

Rule-Authorized Wells

Wells in existence before the promulgation of specific permitting regulations are authorized by rule until regulations require them to be permitted. To meet initial reporting requirements, operators of rule-authorized wells are required to submit inventory information (i.e., facility name; name and address of the facility's legal contact; ownership status; and operating status of the injection well) to the permitting authority using Form 7520-16 (or a state-developed equivalent form). Operators must also submit a plugging and abandonment plan and information regarding financial responsibility (this requirement does not apply to rule-authorized

Class V wells). Authorization terminates if the operator fails to supply any required information, or if the well loses mechanical integrity or contaminates a USDW.

Permitted Wells[4]

Operators of permitted wells must follow a two-step permit application procedure. The operator must submit a permit application prior to construction, and a completion report before commencing injection. Operators must include the following information with their permit applications:

- ***Inventory Information:*** name of the facility, name and address of legal contact, ownership of facility, SIC code(s), and a description of the activities requiring a permit, [all well Classes];

- ***List of Landowners:*** a list of landowners within one-quarter mile of the facility (in DI programs) [all well Classes];[5]

- ***Area of Review Methods:*** methods and calculations used to determine the area of review (AoR) [Classes I, II, and III];

- ***Maps of Wells/Area of Review:*** a tabulation of all wells within the AoR (within 1/4 mile of the well, or within 2 miles of a Class I hazardous well) that penetrate the injection zone or the confining zone [Classes I, II, and III];

- ***Corrective Action Plan:*** a plan for corrective action for wells within the AoR that are not properly plugged [Classes I, II, and III];

- ***Geological and Hydrogeological Data:*** maps and cross sections of USDWs, and data (including maps and cross sections) on the local and regional geology of the confining zone [Classes I and III]; names and depths of USDWs [Class II];

- ***Operating Data:*** a description of the proposed operation, including rates and volumes of fluids to be injected, injection pressures, and sources and constituent analyses of injection fluids [Classes I, II, and III];

[4] Permits may be issued on an area basis as well as on an individual basis, except for hazardous waste injection wells. Refer to Section 5(b) for a description of how the permitting process minimizes the information burden on owners and operators.

[5] This requirement may be waived if the Regional Administrator determines that it is too burdensome (e.g., if the well is located in a populated area). Some regions may also require operators to notify all landowners of their intent to construct the well.

Exhibit 4-2
Operator Paperwork Requirements

Activity	Class				
	I-H	I-N	II	III	V *
Provide Inventory Information					✔
Permit Application					
List of Landowners	✔	✔	✔	✔	✔
Area of Review Methods	✔	✔	✔	✔	
Maps of Wells/Area of Review	✔	✔	✔	✔	
Corrective Action Plan	✔	✔	✔	✔	
Maps and Cross Sections of USDWs	✔	✔		✔	
Names and Depths of USDWs			✔		
Maps and Cross Sections of Local Geology	✔	✔		✔	
Maps and Cross Sections of Regional Geology	✔	✔		✔	
Geological Data on Injection and Confining Zones			✔		
Operating Data	✔	✔	✔	✔	
Formation Testing Program	✔	✔		✔	
Stimulation Program	✔	✔		✔	
Injection Procedures	✔	✔		✔	
Construction Details	✔	✔	✔		
Changes in Injected Fluid				✔	
Plans for Well Failures	✔	✔		✔	
Ambient Monitoring Program	✔	✔		✔	
Plugging and Abandonment Plan	✔	✔	✔	✔	
Financial Assurance	✔	✔	✔	✔	
Completion Report					
Results of Logs and Tests Performed During Construction	✔	✔	✔	✔	
MIT Results	✔	✔	✔	✔	
Anticipated Maximum Injection Pressure & Flow Rate	✔	✔	✔	✔	
Formation Testing Results	✔	✔	✔	✔	
Actual Injection Procedure	✔	✔	✔	✔	
Hydrogeological Compatibility/ Compatibility of Well Materials	✔	✔		✔	
Status of Corrective Action	✔	✔	✔	✔	
Monitoring and Reporting					
Analyze and Report on Chemical Composition of Injectate	✔	✔	✔	✔	✔
Record and Report Injection Pressure, Volume, & Flow Rate	✔	✔	✔	✔	
Perform and Report on MIT	✔	✔	✔	✔	
Conduct and Report on Ambient Monitoring	✔	✔		✔	
Conduct and Report on Pressure Fall-Off Test	✔	✔			
Recordkeeping					
Retain Monitoring, Testing, Permitting Records	✔	✔	✔	✔	✔
Closure					
Closure Report (DI only)	✔	✔	✔	✔	

* Operators of rule-authorized Class V wells will submit inventory information only; Class V wells that are issued permits will be subject to the other paperwork requirements listed.

- ***Formation Testing Program:*** a description of the proposed formation testing program [Classes I and III, optional for Class II];

- ***Stimulation Program:*** a description of the proposed stimulation program [Classes I and III, optional for Class II];

- ***Injection Procedures:*** a description of the proposed injection procedure [Classes I and III, optional for Class II];

- ***Construction Details:*** construction plans, including schematic drawings of the surface and subsurface details of the system [Classes I and II];

- ***Changes in Injected Fluid:*** expected changes in pressure, native fluid displacement, and direction of movement of injected fluid [Classes I and III];

- ***Plans for Well Failures:*** plans for contingency action in the case of shut-ins or well failures [Classes I and III, optional for Class II];

- ***Ambient Monitoring Program:*** planned ambient monitoring program, including the location of monitoring wells and monitoring devices, and the proposed sampling frequency [Classes I and III, optional for Class II];

- ***Plugging and Abandonment Plan:*** plans for closing the well, including type and placement of plugs to be used [Classes I, II, and III]; and

- ***Financial Assurance:*** evidence of financial responsibility for closure, such as surety bonds or financial statements [Classes I, II, and III].

Upon approval of the permit application, the operator may begin construction of the well. Following construction, the operator of a new well must submit a completion report prior to being authorized to inject. Completion reports must include the following elements:

- The results of deviation checks, other logs and tests [Classes I, II, and III];

- Demonstration of mechanical integrity (i.e., the results of a casing pressure test; radioactive tracer survey of the bottom-hole cement; and/or temperature, noise, or other logs to check for movement along the borehole) [Classes I, II, and III];

- Anticipated maximum injection pressure and flow rate [Classes I, II, and III];

- The results of formation fluid sampling, and testing of the injection and confining zones [Classes I, II, and III];

- Actual injection procedure [Classes I, II, and III];

- Report on hydrogeological compatibility and the compatibility of well materials [Classes I and III]; and

- The status of corrective action at improperly abandoned wells within the AoR [Classes I, II, and III].

Operators of Class I hazardous waste wells must adhere to more stringent permit application requirements than those required of other classes of wells. Operators seeking an exemption from the prohibition from injecting any of the Class I listed hazardous wastes must submit the following information in addition to the information described above:

- ***No Migration Petition.*** Operators of Class I hazardous waste injection wells must demonstrate, usually by computer modeling, that their wastes will not endanger USDWs. The operator must provide sufficient information to demonstrate that the hazardous constituents of wastes will not migrate from the disposal site. In particular, the petition must prove that the waste will not reach the roof of the injection zone or a conduit within the injection zone within 10,000 years. This is known as the Fluid Flow Petition.

- ***Hydrogeological Compatibility/Compatibility of Well Material Report.*** Operators of Class I hazardous waste wells must demonstrate hydrogeological compatibility (i.e., determine that the waste stream and its anticipated reaction products will be compatible with both the geologic material of the injection zone and any previously injected fluids), and compatibility of well materials (i.e., demonstrate that the waste stream will be compatible with the well materials that come in contact with the waste).

- ***Waste Analysis Plan.*** Class I hazardous waste well operators must develop and follow an approved written waste analysis plan that describes procedures for obtaining a detailed chemical and physical analysis of a representative sample of their waste. The waste analysis plan must specify (1) the parameters within which the waste will be analyzed and the rationale for selecting these parameters; (2) the test methods that will be used to test for these parameters; and (3) the sampling method that will be used to obtain a representative sample of the waste to be analyzed.

- ***Other Information.*** Operators of Class I hazardous waste wells must also submit a description of the hydrogeological and geochemical conditions at the site; the physicochemical nature of the waste stream; and proof of conformance with AoR requirements.

Class V facilities generally are rule-authorized. However, under the 1999 Class V rule, operators of Class V motor vehicle waste disposal wells in ground water protection areas or other sensitive ground water areas must apply for a permit to continue injecting. Permitting authorities may also require other Class V operators to apply for a permit to commence or to continue injecting. Typically, the permit application process for Class V operators is less complex than for other well classes—operators are typically required to submit a description of the activities requiring a permit, inventory information, topographic maps, and a plugging and abandonment plan which includes a demonstration of financial responsibility for closure.

Monitoring and Testing Requirements

All Class I, II, and III operators must observe injection pressure, rate, and cumulative volume and demonstrate mechanical integrity. Requirements for other monitoring and testing activities vary by class. The following are specific monitoring and testing activities for each well class:

- Monitor injection pressure, flow rate, and cumulative volume of injected fluids [continuously for Class I, weekly for Class II disposal wells (II-D), monthly for Class II-R, and semi-monthly for Class III]; temperature of injected fluids and annulus pressure between the tubing and the long string casing [Class I];

- Conduct chemical monitoring of injectate as described in a waste analysis plan or as specified by the permitting authority [Classes I, II, and permitted Class V MVWDWs];

- Conduct annual sludge monitoring [permitted Class V MVWDWs];

- Test for internal and external mechanical integrity of the well casing, via:

  — casing pressure test [annually for Class I hazardous; every 5 years for Class I nonhazardous, Class II, and Class III salt solution mining]
  — radioactive racer survey of the bottom-hole cement [annually for Class I hazardous];
  — temperature, noise, or other logs to test for movement of fluid along the borehole [every 5 years for Class I and Class III (salt solution mining)];[6]

- Conduct ambient monitoring, including a pressure fall-off test [annually for Class I]; and

- Monitor wells completed in the injection zone and in overlying USDWs [semi-monthly for active Class III wells, monthly for Class III facilities in restoration].

[6] Substitute MIT methods (e.g., review of cementing record) may be approved by the Director.

Reporting and Recordkeeping Requirements

All permitted and rule-authorized wells must report to state or DI agencies on the results of required monitoring and testing.[7] In addition, operators must notify the permitting authority of any planned changes to the facility; changes that may result in noncompliance; progress in meeting the milestones of a compliance schedule; any loss of mechanical integrity or other indication of possible endangerment of a USDW within 24 hours; or any noncompliance with permit conditions.

Scheduled reporting requirements include the following:

- Class I hazardous well operators report quarterly on monitoring results; and annually on MITs and to update their plugging and abandonment cost estimates.

- Class I nonhazardous well operators are required to report quarterly on injectate monitoring; annually on ambient monitoring; and on MITs every 5 years.

- Class II operators must report monitoring data annually; and on MITs every 5 years.

- Class III operators report quarterly on monitoring and on MITs every 5 years.

- Class V motor vehicle waste disposal well operators that obtain a permit must report annually on injectate and sludge monitoring.

For rule-authorized wells in DI states, the Regional Administrator may require operators to submit additional information, as needed, to determine if a well poses a hazard to USDWs. Such information may include evidence of ground-water monitoring, including periodic reports of such monitoring; periodic reports on analysis of injected fluids; and a description of the geologic strata through and into which injection is taking place.

Operators must maintain monitoring information, calibration and maintenance records, required reports, application data, and monitoring results for 3 years; and keep their most recent plugging and abandonment cost estimate for 1 year.

Closure Requirements

When closing their wells, operators must submit to the permitting authority a plugging and abandonment report which indicates that the well was plugged in accordance with the plugging and abandonment plan (this requirement does not apply to rule-authorized Class V

[7] In accordance with the Paperwork Reduction Act of 1995, the reporting requirements covered by this information collection are consistent with the reporting and recordkeeping activities currently in practice by the respondents. For example, respondents generally may report required information in either electronic or hard-copy format, whichever is compatible with their facility practices.

wells). Operators who choose to plug in a manner different from the one specified in their plugging and abandonment plan must first submit and obtain approval for a revised plugging and abandonment plan.

Class I hazardous waste well operators must also conduct a pressure fall-off test and demonstrate mechanical integrity before plugging the well and report the results of these tests with their closure reports.

4(b)(2) Data Items Including Recordkeeping, Required from States

Primacy and DI agencies submit information on wells within their jurisdiction to Headquarters via the 7520 forms. (Primacy agencies are not required to report on the 7520 forms, but must supply all of the information on the federal forms; many states opt to use the 7520 forms, however.) Each of the forms that agencies must submit as respondents, the reporting frequency, and the data items reported are listed in Exhibit 4-3 and are addressed in Section 2(b). Copies of the forms are provided in Appendix E.

Exhibit 4-3
State Reporting Forms

Form	Frequency	Information Collected
Permit Review and Issuance (7520-1)	Annual	Information on permit determinations (i.e., the number of permits issued and not issued, and permit modifications), permit file reviews, the number of rule-authorized wells reviewed, AoR reviews, and corrective action performed.
Compliance Evaluation (7520-2A)	Semi-annual	Enforcement actions, including administrative actions and civil and criminal actions.
Compliance Evaluation - Significant Noncompliance (7520-2B)	Semi-annual	Operators of injection wells identified as being in significant noncompliance (SNC) with statutory requirements and enforcement actions against SNCs and returns of wells to compliance; contamination of USDWs; and closures.
Mechanical Integrity Test/Remedial Actions (7520-3)	Annual	Results of inspections and MITs and remedial actions conducted for any test failures.
Quarterly Exceptions List (7520-4)	Quarterly	Wells that have remained in SNC for 2 or more consecutive quarters and have not been returned to compliance or been subject to a formal enforcement action.
Inventory of Wells Information Form (7520-16)	Annual	Inventory information, including the facility name; the legal contact of the facility; and well information, including type, number, and operating status of injection wells.

5. Information Collected: EPA Activities, Collection Methodology, and Information Management

Section 5(a) describes state oversight of operators and EPA activities with respect to program management. Section 5(b) describes how EPA will manage the information collected; Section 5(c) discusses how this information collection addresses the needs of small businesses; and Section 5(d) presents EPA's justification for the collection schedule.

5(a) State and Agency Activities

5(a)(1) State Activities

Under Section 1422 of the SDWA, states that adopt UIC regulations that are at least as stringent as the federal requirements may be granted primacy for the UIC Program. Under Section 1425, state programs that regulate oil and gas-related injection must demonstrate that their program "represents an effective program to prevent underground injection which endangers drinking water sources" in order to be granted primacy.

In addition to the reporting activities described in Section 4(b)(2), state primacy agencies are responsible for overseeing the permitting of wells within their states. Primacy agents receive and review permit applications from operators, solicit and respond to public comments, and issue final decisions on permit applications. States also review completion reports and associated testing results to verify that new wells have been constructed in accordance with construction standards.

State agencies review injectate and ambient monitoring data submitted by operators; they also review MITs and pressure fall-off tests. Many states witness some or all MITs and plugging and abandonments. State primacy agencies also respond to occasional reporting submitted by operators, conduct periodic permit reviews, and respond to operators' requests for permit modifications.

State agencies also report to EPA on the status of their programs. The two mechanisms by which states report are the 7520 forms (or equivalent reporting) and a newly-developed Web site to report on UIC Program Strategic Measures.

5(a)(2) Agency Activities

EPA regions oversee injection wells in those states that do not have approved primacy programs. The regions perform the same activities as state primacy agents. In addition, regional offices review no-migration petitions submitted by Class I hazardous facility operators in both primacy and DI states. Regional staff review reports on MITs and pressure fall-off tests

performed in the DI programs, and in some cases, tests on wells in primacy states. DI programs also review closure reports required of operators when they abandon their wells.

EPA Headquarters activities consist of compiling the regional summary information on permit reviews and issuance; compliance evaluation, enforcement and inspections information, and inventory data reported on the 7520 forms; and measures data.

5(b) Collection Methodology and Management

Current reporting from operators to states/DI programs and from states and DI programs to Headquarters is primarily accomplished by completing the UIC Program's 7520 reporting forms. The complete set of PDF-format 7520 reporting forms is available to be downloaded on OGWDW's Web site (www.epa.gov/safewater/uic/7520s.html), as well as on GSA's Web site. (Appendix E of this ICR contains copies of all the UIC reporting forms.)

State and DI programs maintain detailed data about each well regulated by the UIC Program. Collection of data from individual operators and quality assurance is the responsibility of the individual state and DI programs. These data are the source of summary information submitted to the Regions and EPA Headquarters for oversight and program management. Most use some type of electronic data management system to maintain this data—EPA estimates, based on a recent database cataloging effort, that approximately 100 state and DI UIC program databases are in use. However, at present, all summary reporting to Headquarters is via paper forms.

One exception to the paper-based reporting to Headquarters is an effort to support collection of information on the UIC Program Activity Measures. EPA has developed an online reporting mechanism, by which states and DI programs will log on to a secure Web site to provide measures data.

Electronic reporting involves transmitting UIC data in a standard electronic format that can be readily incorporated into Headquarters UIC databases without manual data entry. Electronic reporting supports the Agency's effort to streamline the UIC Program by reducing the reporting burden on the states and improving EPA's data collection methods. Electronic reporting offers an opportunity to:

- Reduce data entry;
- Reduce mailing costs;
- Reduce the routine process of handling paperwork;,
- Reduce or eliminate the need to store large quantities of paper documents; and
- Increase the accuracy of reports submitted to OGWDW and the Office of Enforcement and Compliance Assurance.

EPA has begun to develop a well-specific database to collect and store data to support UIC programmatic data needs. The national UIC database will include a mechanism to

electronically transfer data between existing state and DI databases and Headquarters' database, eventually eliminating the need for state UIC Program Directors to complete paper reporting forms.

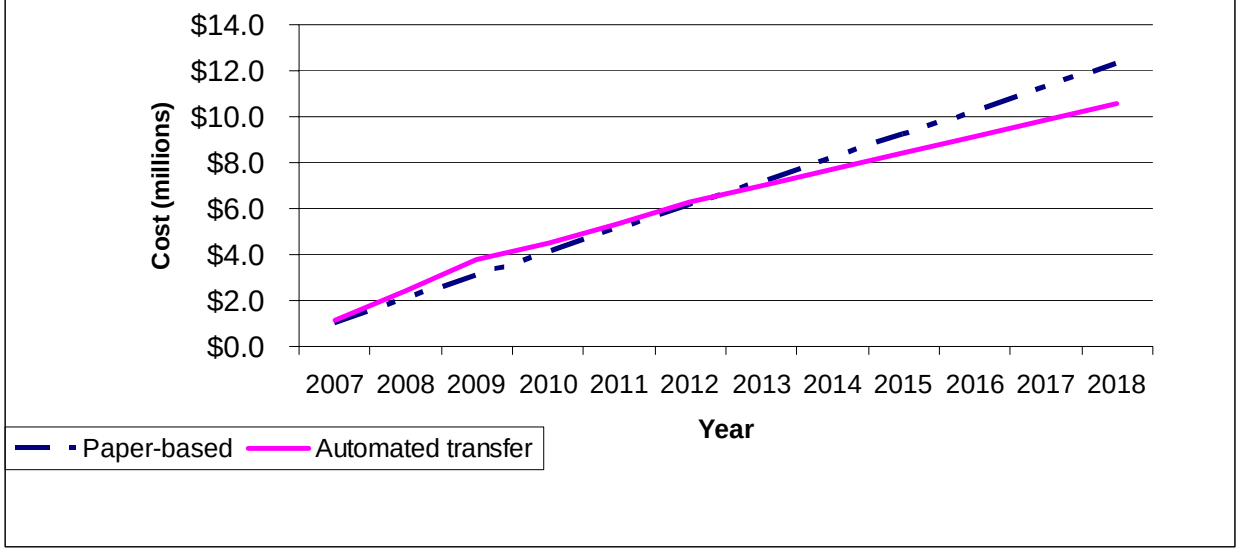
EPA Headquarters plans to deploy the national UIC database in 2007. Before deployment, states will incur a "start up" cost to initiate the transfer of their data to the national database. Once the data flow is in place, states will incur minimal cost to transfer data to Headquarters quarterly; this cost will be lower than the current annual reporting costs to states associated with gathering data and completing the reporting forms.

Under the current, paper-based system, each state spends about $18,000 annually to accomplish the required reporting. Following the investment in the data transfer, states will incur lower annual costs: an estimated cost of about $11,000 to enter data and transfer it to Headquarters quarterly.

Even taking into account the costs of the initial phase-in, EPA estimates that the cumulative costs to states for data development and data management via the database (represented by the solid line in the graph in Exhibit 5-1) are lower than they would have been to report by paper during the same time frame (the dashed line).

Appendix B describes the data transfer activities in detail, the schedule by which states are expected to begin the data transfer, and the eventual burden and cost savings to states associated with the national UIC database.

Exhibit 5-1
Comparison of State Costs:
Current Reporting Process vs. Database Transfer



5(c) Small Entity Flexibility

Few, if any, small businesses are operators of Class I or Class III injection wells. In contrast, many Class II and Class V operators affected by this collection are small entities. This collection reduces to the extent practicable and appropriate the burden on persons that provide information to or for EPA, including with respect to small entities, as defined by the Regulatory Flexibility Act [5 USC 601(6)], the use of such techniques as:

- Establishing differing compliance or reporting requirements or timetables that take into account the resources available to those who are to respond;
- The clarification, consolidation, or simplification of compliance and reporting requirements; or
- An exemption from coverage of the collection of information, or any part thereof.

Class I

The size standard the Small Business Administration uses to define "small business" varies by SIC code. Class I wells typically involve the following SIC codes:

- Major Group 13: Oil and gas extraction
- Major Group 28: Chemicals and allied products
- Major Group 26: Paper and allied products
- Major Group 29: Petroleum and coal products
- Major Group 32: Stone, clay and glass products
- Major Group 33: Primary metal industries
- Major Group 36: Electrical and electronic machinery
- Major Group 37: Transportation equipment
- Major Group 45: Transportation by air
- Major Group 49: Electric, gas, and sanitary services
- Major Group 89: Services not elsewhere classified
- Major Group 99: Non-classifiable establishments

The small business size standards for firms in these SIC code groups vary from 500 to 1,500 employees, except for SIC code 4953, for which the size standard is $3.5 million or less in revenues. Most of the firms that own or operate Class I injection wells clearly exceed both the 500-employee and the 1,500-employee standard. Examples include Allied Chemical, Bethlehem Steel, Dow Chemical, DuPont, Exxon, General Electric, Monsanto, Shell, and USX. The hazardous waste disposal firms that own and operate Class I wells (SIC code 4953) are believed to exceed the $3.5 million revenue standard.

Class II

Oil and gas extraction firms fall into three SIC categories:

- SIC code 1311 (crude petroleum and natural gas);
- SIC code 1321 (natural gas liquids); and
- SIC code 1381 (drilling oil and gas wells).

All of these categories have small business size standards of 500 employees. According to Dun and Bradstreet Market Analysis Profile, more than 90 percent of the firms in these SIC codes are small businesses, using the 500-employee standard. Even though many of the operable Class II injection wells are owned and operated by large businesses, industry observers believe that as many as half of the Class II wells are owned and operated by firms that are well below the 500-employee size standard.

Section 1421 of the SDWA states that regulation of Class II wells must be kept to a minimum, while at the same time assuring that USDWs will not be endangered. Recognizing this intent, EPA has minimized reporting requirements for Class II wells in the following ways. First, while operators of Class I and Class III wells report injection fluid characteristics quarterly, Class II operators report that information annually. Second, Class I monitoring requirements include the installation and use of continuous recording devices to monitor injection pressure, flow rate, volume, and annulus pressure [40 CFR 146.13]. In contrast, Class II operators are

only required to observe injection pressure, flow rate, and cumulative volume and to record these measurements at least monthly [40 CFR 146.23].

The UIC regulations [40 CFR 146.14, 146.24, 146.34] define the information the UIC Program Director must consider in authorizing Class I, II, and III wells, respectively. Less information is required of Class II wells than other types of wells. For permitting of Class I and Class III wells, maps and cross sections detailing geologic structure may be required, whereas Class II well operators must provide only a description of geologic conditions. Finally, while the permitting authority may require Class I operators to provide detailed construction procedures, including a cementing program; logging procedures; deviation checks; and a drilling, testing, and coring program, Class II well operators need not submit this information.

EPA has also recognized the needs of operators of Class II wells in other ways. For example, oil and gas wells are often temporarily abandoned, especially by small businesses that operate at marginal production rates. To accommodate this situation, the regulations specify that cessation of operation does not require plugging (and associated information collection) until two years have elapsed.

Class III

Operators of this class of wells fall into the following categories:

- SIC Major Group 10 (metal mining) and
- SIC Major Group 14 (mining and quarrying of non-metallic minerals).

The applicable size standard for both groups is 500 or fewer employees. According to the preamble to the 1980 UIC regulations (45 FR 42472), the operators of these wells are large, diversified corporations, well above the size standard of 500 employees. There is no reason to believe that there has been any material change in the size of the firms since that analysis was done.

Class V

EPA estimates that the majority of facilities affected by the Class V Rule will be small businesses. To reduce the impact of the rule on small entities, EPA has attempted to keep recordkeeping, reporting, and other administrative requirements for these operators to a minimum in order to provide regulatory relief to small entities while protecting drinking water supplies. Most Class V facilities do not have collection requirements other than to provide inventory information. EPA also convened a Small Business Advocacy Review Panel, as required by the Small Business Regulatory Enforcement Fairness Act (SBREFA), to explore options for minimizing economic impacts on small entities.

The economic analysis prepared for the 1999 final Class V rule includes a complete, final Regulatory Flexibility Analysis addressing all activities, including reporting and recordkeeping activities, required of small entities.

5(d) Collection Schedule

EPA developed the schedule for information collection and reporting to minimize the amount of information collected while ensuring that enough information is given for appropriate and timely oversight, evaluation, and enforcement. The rationale for operator and state reporting frequencies is described below. A complete description of the collection requirements can be found in Section 4.

5(d)(1) Operator Reporting

In determining the reporting schedule for each class of wells, EPA considered the potential for each class to contaminate USDWs. Operators of Class I, III, and some Class V wells must report monitoring results quarterly; Class II operators report annually. The regular reporting of these data is essential to protecting USDWs. Specific operator reporting schedules for each well class are presented in Tables A-1 through A-6 of Appendix A.

5(d)(2) State Reporting

Exhibit 5-2 summarizes the frequencies at which state primacy agencies must report UIC data, including the 7520 forms and Program Activity Measures (PAMs). The paragraphs following the Exhibit present the justification for the reporting frequencies.

In response to President Clinton's April 24, 1995, directive to reduce regularly scheduled reporting frequencies by one-half, except in cases where such action would not adequately protect the environment, in FY 1996 EPA reduced the frequency of certain state UIC reporting. EPA has also discontinued the requirement that states submit the grant utilization form (7520-5). As Section 5(b) discusses, upon implementation of the national UIC database, states UIC flowing data to Headquarters will no longer be required to submit the 7520 forms and PAM data.

Exhibit 5-2
State Reporting Frequencies

Reporting Activity	Frequency
Form 7520-1: Permit Review and Issuance	Annual
Form 7520-2A: Compliance Evaluation	Semi-annual
Form 7520-2B: Compliance Evaluation for Significant Noncompliance	Semi-annual
Form 7520-3: Mechanical Integrity Test/Remedial Actions	Annual
Form 7520-4: Quarterly Exceptions List	Quarterly
Form 7520-16: Inventory of Injection Wells	Annual
Program Activity Measures	Semi-annual

7520-1: Permit Review and Issuance. Permits are the core of the UIC Program, and annual permit information is used for program management purposes. The Program uses permit information to evaluate events that delay or accelerate the permitting process. Delays in the permitting process may result in the states' inability to meet program objectives and prevent states from meeting schedules. A permitting process that is too lengthy could have a detrimental impact on industry. Conversely, favorable developments may occur that enable the states to meet time schedules and goals sooner than anticipated. Both occurrences have a potential for shifts in workload and resource distribution.

7520-2A: Compliance Evaluation; 7520-2B: Significant Non-compliance. The justification for semi-annual reporting of compliance information is based on EPA efforts to be routinely and frequently informed of violations to regulations in effect under Section 1421 of the SDWA. EPA must be kept informed in order to (a) oversee and encourage states' actions on resolving violations or enforcing against violators, and (b) to take direct federal action where appropriate state actions have not occurred in a timely manner or have not been successful.

EPA would be unable to effectively carry out the Congressional direction for federal enforcement on violators if it only had access to data annually. Prior to 1987, states provided EPA with the above information on an annual basis. States then agreed to voluntarily supply the data on a quarterly basis when it became obvious that EPA Headquarters could not direct an effective federal enforcement program using data received only once a year. EPA later determined that semi-annual reporting of this information is sufficiently frequent to track compliance information.

7520-3: Inspections/Mechanical Integrity Testing. Inspections are the principal method of identifying instances of noncompliance. Annual inspection information is used to monitor states' performance on inspections. Inspections have resulted in criminal indictment and imprisonment of well owners. Annual inspection information assures that inspections are being performed on a continual basis throughout the year. The MIT is the principal method used to determine whether a well is operating in a protective manner. Annual MIT information is used to evaluate the MIT program. Operators must record and submit information on the types, frequencies, results, and remedial actions taken on a series of MIT tests.

7520-4: Quarterly Exceptions List. EPA needs quarterly information on SNCs that have been out of compliance for two or more consecutive quarters. The Agency uses this information to determine whether timely and appropriate actions have been taken by primacy authorities and to track enforcement activities, as these wells pose the greatest threat to USDWs.

7520-16: Inventory of Injection Wells. Annual reporting on inventory data, as required by 40 CFR 144.8, is necessary for effective oversight of the UIC Program. Primacy states, Regions, and EPA Headquarters need to be routinely and frequently informed of changes in the number and operating characteristics of injection wells to monitor and regulate underground injection effectively and to continue protecting USDWs from contamination.

PAM Data. EPA Headquarters needs to collect PAM data semi-annually to meet the Office of Water's reporting schedules to assess progress toward meeting Agency Strategic Targets for achieving minimized risk to public health. Mid-year and end-of- year reporting on progress toward environmental and public health goal and program commitments supports national assessments of Water Program performance and recommendations for management actions to strengthen performance.

6. Estimating the Burden and Cost of the Collection

This section contains EPA's estimates of the burden and costs to respondents (i.e., well owner/operators and state primacy agencies) associated with UIC paperwork requirements, and federal burden hours and costs for reviewing respondent submissions. Section 6(a) provides estimates of burden hours for all respondent types. Section 6(b) contains estimates of respondent costs for the information collection. Section 6(c) summarizes federal burden and costs as users of respondent data. Section 6(d) describes the respondent universe and the total burden and cost of this collection to respondents. Section 6(e) covers aggregate burden hours and costs for all respondents, and Section 6(f) explains the reasons for the change in estimated respondent burden hours and costs from the approved ICR burden. The burden statement for this information collection is in Section 6(g).

6(a) Respondent Burden

6(a)(i) Burden to Owners and Operators of Injection Wells

Operators of injection wells incur reporting burden associated with the following types of activities: permitting and startup of operations, ground water and injectate monitoring and well testing during well operation, reporting of monitoring results and other events, recordkeeping, and well closure.

EPA estimates that the annual burden on the 38,768 owner/operators of injection wells will be 840,985 hours over the 3 years covered by this ICR. This is summarized in Exhibits 6-1A-E. See Appendix A for detail on the assumptions used to calculate the owner/operator burden and detailed burden and cost calculations.

1) Class I Well Operators

The total annual burden on the 289 operators of Class I wells nation-wide is estimated to be 88,434 hours. See Exhibit 6-1A. EPA estimates the annual burden for the 63 operators of Class I hazardous wells to be 24,304 hours, and the burden for 226 operators of Class I non-hazardous wells to be 64,130 hours annually.

The requirements for Class I operators are the most stringent in the UIC Program. Operator activities associated with Class I facilities include permitting and start-up related reporting, permit renewals and modifications of permits or petitions, monitoring, reporting and recordkeeping, and closure-related paperwork. Operators of Class I hazardous wells must also perform an extensive no-migration demonstration that their wastes will not endanger USDWs.

Appendix A summarizes the assumptions used to calculate the owner/operator burden and provides detailed burden and cost calculations. Table A-1 of Appendix A presents cost and burden estimates specific to Class I wells.

Exhibit 6-1A Annual Burden and Cost Associated with Class I Wells 2007-2010							
Respondent Type	**Burden (hours)**	**Labor Cost**	**Non-Labor Cost**	**Total Cost**	**Responses**	**Burden/ Response**	**Cost/ Response**
Operators	88,434	$3,360,646	$25,041,790	$28,402,436	4,581	19.30	$6,199.82
Primacy States	4,854	$181,312	$0	$181,312	1,383	3.51	$131.14
DI Programs	5,827	$221,705	$0	$221,705	544	10.72	$407.79
TOTAL	**99,115**	**$3,763,663**	**$25,041,790**	**$28,805,453**	**6,507**	**15.23**	**$4,426.56**

2) Class II Well Operators

As shown in Exhibit 6-1B, EPA estimates the total annual burden on the 14,395 operators of Class II wells (associated with the oil and natural gas industry) to be 593,332 hours. Class II well operators perform many of the same types of activities as Class I wells, including submitting permit applications and completion reports, monitoring and mechanical integrity testing (MIT), reporting and recordkeeping, and closure-related paperwork.

See Appendix A (particularly Table A-2) for details on the assumptions used to calculate the owner/operator burden and cost associated with the requirements for Class II wells.

Exhibit 6-1B Annual Burden and Cost Associated with Class II Wells 2007-2010							
Respondent Type	**Burden (hours)**	**Labor Cost**	**Non-Labor Cost**	**Total Cost**	**Responses**	**Burden/ Response**	**Cost/ Response**
Operators	593,332	$21,338,786	$56,001,210	$77,339,997	313,913	1.89	$246.37
Primacy States	45,761	$1,741,103	$0	$1,741,103	29,722	1.54	$58.58
DI Programs	3,095	$117,743	$0	$117,743	2,283	1.36	$51.58
TOTAL	**642,187**	**$23,197,632**	**$56,001,210**	**$79,198,842**	**345,918**	**1.86**	**$228.95**

3) Class III Well Operators

The estimated total annual burden on the 165 operators of Class III facilities is 55,387 hours. See Exhibit 6-1C. Operators of these wells associated with mining operations incur burden associated with permit applications and completion reports, monitoring, reporting and recordkeeping, and closure-related paperwork.

See Appendix A (particularly Table A-3) for details on the assumptions used to calculate the owner/operator burden and cost associated with the requirements for Class III wells.

Exhibit 6-1C Annual Burden and Cost Associated with Class III Wells 2007-2010							
Respondent Type	**Burden (hours)**	**Labor Cost**	**Non-Labor Cost**	**Total Cost**	**Responses**	**Burden/ Response**	**Cost/ Response**
Operators	55,387	$1,892,313	$716,333	$2,608,646	5,996	9.24	$435.04
Primacy States	3,367	$128,122	$0	$128,122	594	5.67	$215.74
DI Programs	282	$10,741	$0	$10,741	430	0.66	$24.97
TOTAL	**59,037**	**$2,031,176**	**$716,333**	**$2,747,509**	**7,020**	**8.41**	**$391.36**

4) Class IV/Endangering Class V Well Operators

Class IV wells and Class V wells that are found to be endangering USDWs are banned from injection, and owners of these wells are required to close them and submit plugging and abandonment reports to states or DI programs. The exception to the ban is for those Class IV wells used to inject contaminated ground water that has been treated and re-injected into the same formation from which it was drawn. These wells are authorized by rule for the life of the well if such subsurface emplacement of fluid is approved by EPA or a state pursuant to the provisions for the cleanup of releases under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 or RCRA.

EPA estimates that the burden on the 990 operators of these wells that are subject to this information collection will be 9,900 hours annually. See Exhibit 6-1D and Appendix A.

Exhibit 6-1D Annual Burden and Cost Associated with Class IV Wells 2007-2010							
Respondent Type	**Burden (hours)**	**Labor Cost**	**Non-Labor Cost**	**Total Cost**	**Responses**	**Burden/ Response**	**Cost/ Response**
Operators	9,900	$213,662	$0	$213,662	990	10.00	$215.82
Primacy States	758	$28,840	$0	$28,840	758	1.00	$38.05
DI Programs	232	$8,827	$0	$8,827	232	1.00	$38.05
TOTAL	**10,890**	**$251,329**	**$0**	**$251,329**	**1,980**	**5.50**	**$126.93**

5) Class V Well Operators

The total annual burden on the 22,929 operators of Class V wells with reporting requirements under this information collection is estimated to be 93,933 hours. See Exhibit 6-1E and Appendix A.

All operators of Class V wells must submit inventory information before they may begin operating their wells. In addition, the 1999 Class V Rule provided additional

requirements for owners of MVWDWs and large-capacity cesspools. Facilities that wish to continue operating MVWDWs must apply for permits. MVWDWs and large-capacity cesspools that close are required to submit pre-closure notifications.

Although the Class V Rule required that all of these facilities be closed or apply for a permit by January 2007 (the latest date by which operators with state-granted extensions would be required to close their well or apply for a permit), EPA assumes that some of these activities may not be complete. Thus, some permitting/closure burden is included in this ICR. In addition, operators of MVWDWs that opted to apply for (and received) permits must monitor their injectate and sludge and submit annual monitoring reports.

Exhibit 6-1E
Annual Burden and Cost Associated with Class V Wells
2007-2010

Respondent Type	Burden (hours)	Labor Cost	Non-Labor Cost	Total Cost	Responses	Burden/ Response	Cost/ Response
Operators	93,933	$2,057,461	$22,489,574	$24,547,035	50,273	1.87	$488.27
Primacy States	16,216	$616,973	$0	$616,973	16,433	0.99	$37.55
DI Programs	8,871	$337,505	$0	$337,505	8,999	0.99	$37.50
TOTAL	**119,019**	**$3,011,938**	**$22,489,574**	**$25,501,512**	**75,705**	**1.57**	**$336.85**

Exhibit 6-1F summarizes the operator burden and costs, by well type (from Exhibits 6-1A through E). Exhibit 6-2, in the next section, provides a similar summary for primacy agencies.

Exhibit 6-1F Summary of Annual Operator Burden and Cost (based on above exhibits) 2007-2010							
Respondent Type	**Burden (hours)**	**Labor Cost**	**Non-Labor Cost**	**Total Cost**	**Responses**	**Burden/ Response**	**Cost/ Response**
Class I Operators	88,434	$3,360,646	$25,041,790	$28,402,436	4,581	19.30	$6,199.82
Class II Operators	593,332	$21,338,786	$56,001,210	$77,339,997	313,913	1.89	$246.37
Class III Operators	55,387	$1,892,313	$716,333	$2,608,646	5,996	9.24	$435.04
Class IV Operators	9,900	$213,662	$0	$213,662	990	10.00	$215.82
Class V Operators	93,933	$2,057,461	$22,489,574	$24,547,035	50,273	1.87	$488.27
TOTAL	**840,985**	**$28,862,868**	**$104,248,907**	**$133,111,775**	**375,754**	**2.24**	**$354.25**

6(a)(ii) Burden to Primacy Agencies

EPA estimates that the annual burden on the 56 state primacy agencies that oversee the various classes of injection wells is 159,663 hours for the years 2007 through 2010. Exhibit 6-2 shows the annual Primacy agency burden hours associated with oversight of each class of injection well. Appendix A describes the bases for the burden estimates.

State primacy agencies' burden as users or reviewers of operator-submitted data associated with implementing Class I through Class V UIC programs arise from processing permit applications and completion reports, reviewing monitoring and testing data, and responding to closure reports submitted by operators within their states.

The burden to **states as respondents** is associated with compiling and reporting data using the 7520 forms and the UIC measures reporting process. During the clearance period, EPA estimates that up to 36 states will also begin to transfer data to EPA Headquarters to populate the national UIC database. Appendix B describes the costs to states associated with this effort.

Exhibit 6-2 Annual Primacy Agency Burden and Cost 2007-2010							
Respondent Type	**Burden (hours)**	**Labor Cost**	**Non-Labor Cost**	**Total Cost**	**Responses**	**Burden/ Response**	**Cost/ Response**
Class I Programs	4,854	$181,312	$0	$181,312	1,383	3.51	$131.14
Class II Programs	45,761	$1,741,103	$0	$1,741,103	29,722	1.54	$58.58
Class III Programs	3,367	$128,122	$0	$128,122	594	5.67	$215.74
Class IV Programs	758	$28,840	$0	$28,840	758	1.00	$38.05
Class V Programs	16,216	$616,973	$0	$616,973	16,433	0.99	$37.55
Subtotal -Operator Oversight	**70,955**	**$2,696,350**	**$0**	**$2,696,350**	**48,889**	**1.45**	**$55.15**
States as Respondents	88,708	$3,375,144	$448,922	$3,824,066	1,008	88.00	$3,793.72
TOTAL	**159,663**	**$6,071,494**	**$448,922**	**$6,520,416**	**49,897**	**3.20**	**$130.68**

6(b) Respondent Costs

6(b)(i) Cost to Operators

Exhibits 6-1A through E and 6-1F show the total costs for owners and operators of various classes of injection wells over the 3-year ICR clearance period. Annual costs are estimated at approximately $133.1 million, which consists of $104.2 million in non-labor costs and $28.9 million in labor costs.

EPA determined operator labor cost by estimating the mix of legal, managerial, technical, and clerical time needed to perform each collection activity. For Classes I, II, and III, the labor cost estimate is based on average hourly estimates for salary and overhead of $80 for legal staff, $70 for managerial staff, $39 for technical staff, and $24 for clerical staff. For Classes IV and V, hourly salary and overhead rates are estimated to be slightly less: $53 for managerial staff, $23 for technical staff, and $17 for clerical staff (no legal staff labor is assumed for these operators). Contractor time (which is included in the non-labor costs in this ICR) was estimated to be approximately $80 per hour.

EPA estimated non-labor costs from data provided by staff in EPA Regions and state primacy agencies, and from operators and other sources. This ICR assumes there are no capital costs to operators–large capital expenditures associated with underground injection (e.g., construction costs and monitoring equipment) are considered to be customary business practice. All non-labor costs to operators associated with this collection are operating and maintenance (O&M) costs, such as the cost of contractor services or laboratory fees associated with injectate, sludge, or ground water monitoring.

6(b)(ii) Cost to Primacy Agencies

Exhibit 6-2 shows that the annual cost to primacy agencies is estimated at

approximately $6.5 million, of which most ($6.1 million) is labor cost. For this ICR, EPA assumed that the average hourly labor rate for a state employee is $38.05. This estimate is based on a federal GS-9, Step 10 salary on the 2006 federal pay scale, increased by 60 percent to account for overhead costs. (This is the inflation factor recommended in EPA's *ICR Handbook*.)

The non-labor costs (capital and O&M) to states in this ICR are estimated to be $448,922. These costs are associated with data development and transfer to the national UIC database. The capital/start-up costs attributable to this information collection include purchases of computer hardware to allow data transfer from primacy agencies to Headquarters to populate the national UIC database. The total capital costs for this ICR are $252,000, an average of $84,000 per year. The remaining non-labor costs to states are the cost of contractor support for database development.

6(c) Agency Burden and Costs

EPA's regional offices implement the UIC Program for all well classes in 10 states and have oversight responsibility for a subset of well classes in 6 states. The paperwork requirements for DI programs are roughly the same as those for the state primacy programs. In addition, EPA regions review all no-migration petitions submitted by Class I hazardous facility operators in both primacy and DI states in their region. The total annual burden for federal DI programs associated with the above activities is 18,306 hours. In addition, EPA Headquarters spends an estimated 2 FTEs, or 4,160 hours annually in its oversight responsibilities for the UIC Program activities related to this information collection. Headquarters activities include gathering and reviewing 7520 forms, analysis of measures data, and development of the national UIC database. See Exhibit 6-3.

EPA assumes the average hourly labor rate for salary and overhead and benefits for Agency staff to be $38.05. This estimate is based on a federal GS-9, Step 10 salary on the 2006 federal pay scale, increased by 60 percent to account for overhead costs. The annual federal cost associated with this collection is $854,801. The breakdown of Agency cost associated with each well class is presented in Exhibit 6-3.

Exhibit 6-3 Annual Agency Burden and Cost 2007-2010							
Respondent Type	**Burden (hours)**	**Labor Cost**	**Non-Labor Cost**	**Total Cost**	**Responses**	**Burden/ Response**	**Cost/ Response**
Class I DI Programs	5,827	$221,705	$0	$221,705	544	10.72	$407.79
Class II DI Programs	3,095	$117,743	$0	$117,743	2,283	1.36	$51.58
Class III DI Programs	282	$10,741	$0	$10,741	430	0.66	$24.97
Class IV DI Programs	232	$8,827	$0	$8,827	232	1.00	$38.05
Class V DI Programs	8,871	$337,505	$0	$337,505	8,999	0.99	$37.50
Headquarters Management	4,160	$158,280	$0	$158,280	1	4,160.00	$158,279.68
TOTAL	**22,466**	**$854,801**	**$0**	**$854,801**	**12,489**	**1.80**	**$68.45**

6(d) Estimating Respondent Universe and Total Burden and Costs

EPA estimates that 38,768 owners or operators of injection wells and 56 state primacy agencies are subject to the UIC Program's information collection requirements outlined in Section 6(a). The number of responses for each well class and activity are shown in Exhibits 6-1A though 6-1E, and summarized in Exhibit 6-1F. The estimates of the number of state responses are also shown in Exhibit 6-2. This number, known as the respondent universe, is based on EPA's assumptions of the number of permittees subject to each paperwork requirement, e.g., the number of permit applications or well closures expected, or the percent of permittees subject to monitoring or reporting requirements and the frequency with which they must comply with those requirements. Part 2 of Appendix A provides more detail on EPA's assumptions about the number of respondents for each collection activity.

EPA estimates that the total annual respondent burden over the 3 years covered by this ICR is 3.0 million hours. The total cost to respondents is $419 million.

6(e) Bottom Line Burden Hours and Costs

The bottom line burden hours and costs appear in Exhibit 6-4.

Exhibit 6-4 Bottom Line Annual Burden and Cost 2007-2010			
Number of Respondents	38,824 =	38,768 56	Operators (from EPA inventory) **+** Primacy agencies
Total Annual Responses	425,652 =	375,754 49,897	Operator responses (from Exhibit 6-1F) **+** Primacy agency responses (from Exhibit 6-2)
Number of Responses per Respondent	10.96 =	425,652 38,824	Total annual responses from above **÷** Total respondents from above
Total Respondent Hours	1,000,648 =	840,985 159,663	Operator burden (from Exhibit 6-1F) **+** Primacy agency burden (from Exhibit 6-2)
Hours per Response	2.35 =	1,000,648 425,652	Total annual hours from above **÷** Total responses from above
Annual O&M and Capital Cost	$104,697,829 =	$104,248,907 $448,922	Operator non-labor cost (from Exhibit 6-1F) **+** Primacy agency non-labor cost (from Exhibit 6-2)
Total Respondent Cost	$139,632,191 =	$133,111,775 $6,520,416	Operator cost (from Exhibit 6-1F) **+** Primacy agency cost (from Exhibit 6-2)
Total Hours (Respondents plus Agency)	1,023,114 =	1,000,648 22,466	Total respondent hours from above **+** Total EPA hours (from Exhibit 6-3)
Total Cost (Respondents plus Agency)	$140,486,991 =	$139,632,191 $854,801	Total respondent cost from above **+** Total EPA cost (from Exhibit 6-3)

Note: Detail may not add exactly to total due to independent rounding.

6(f) Reasons for Change in Burden

The total annual approved burden on operators and states associated with the UIC Program is 1,336,057 hours. This ICR requests total annual respondent burden of 1,000,648 hours. Thus, there is a net reduction in burden of 335,409 hours between the approved and requested amounts. Of this, about 283,000 hours is reduced operator burden and 52,400 is reduced primacy agency burden.

Note that the approved burden cited above differs from the burden in the 2004 UIC Program ICR. The 2004 ICR (ICR No. 370.17) estimated a total annual burden on operators and states of 1,334,054 hours. The current approved burden reflects the addition of activities associated with the Revision to Federal UIC Requirements for Class I Municipal Wells in Florida, estimated in EPA ICR No. 370.20. That ICR added 1,472 operator hours and 531 primacy agency hours to the approved UIC Program burden.

This section discusses the change in burden to operators of injection wells and primacy states between the burden requested in this ICR and the approved burden. The burden changes are the result of program changes and adjustments and affect well operators and the agencies that oversee them to varying degrees.

The paragraphs below describe these changes. Exhibits 6-5 and 6-6 summarize the burden impacts of these changes to operators and primacy agencies, respectively.

Program Changes

Program changes that affect the UIC reporting burden in this ICR include the following:

- *Activities associated with the Class V Rule* should abate in this ICR period. All well closures and permitting activities should have been completed by January 2007. However, based on information from some states and regions, there is evidence that not all of these activities are complete, and some permitting activities will carry over to this ICR clearance period. The burden associated with injectate and sludge sampling by MVWDW operators will continue. This change reduces the operator burden by 71,669 hours and primacy agency burden by 4,762 hours.

- *UIC Measures reporting*—EPA Headquarters is now requiring mid-year reporting of target measures by states. This change adds 2,240 hours to the primacy agency burden.

- *National UIC database*—EPA Headquarters is implementing a new database to streamline reporting from states and DI programs to Headquarters. The state burden and cost during the clearance period will increase by an estimated 3,576 hours, as the first states to populate the national UIC database do their initial data mapping. However, as more and more states complete database development activities and begin to automate the reporting process, the total reporting burden will decrease. Appendix B describes the planned development and implementation of the UIC database, and compares the reporting costs to states with and without a national database.

Adjustments

Adjustments that affect the UIC reporting burden in this ICR include the following:

- *Inventory changes and adjustments*–Between 2004 and 2006, the national injection well inventory increased by 195,000 wells—the majority of the increase is in the Class V inventory. Another adjustment relates to assumptions about the number of Class II operators that will be submitting permit applications—EPA estimates a significant decrease in permit applications between the 2004 and 2007 ICRs; this adjustment accounts for most of the change in burden between the two clearance periods. The net effect of these adjustments is a 211,000 hour decrease in operator burden and a 53,000 hour decrease in state burden.

Exhibit 6-5
Reasons for Change in Annual Operator Burden (Hours)

Type of Change	Change	Running Total	Comment
Approved operator burden		1,123,994	Carry-over from approved burden.
Abatement of activities related to the Class V Rule	-71,669	1,052,325	Program change. Burden associated with permitting and closure of MVWDWs and closure of large capacity cesspools is largely complete. Most activities in this clearance period are associated with sampling by MVWDW operators who opted to apply for a permit.
Inventory adjustments	-211,339	840,985	Adjustment. Most of the change is associated with fewer Class II operators applying for permits.
Total change	-283,009		Total change in operator burden between approved and requested.

Note: Detail may not add exactly to totals due to independent rounding.

Exhibit 6-6
Reasons for Change in Annual Primacy Agency Burden (Hours)

Type of Change	Change	Running Total	Comment
Approved primacy agency burden		212,063	Carry-over from approved burden.
Abatement of activities related to the Class V Rule	-4,762	207,301	Program change. Burden associated with reviewing permit applications and pre-closure notification forms from operators of MVWDWs and large capacity cesspools is largely complete. Most of burden is associated with reviewing monitoring data submitted by operators of MVWDWs that obtained a permit.
National UIC database	3,576	210,877	Program change. Short-term increase in burden associated with mapping of data from state databases to the national UIC database. See Appendix B.
UIC Measures reporting	2,240	213,117	Program change. Addition of mid-year reporting of target measures.
Inventory adjustments	-53,454	159,663	Adjustment. Most of the change is associated with reduced Class II permit application reviews.
Total change	-52,400		Total change in state burden between approved and requested.

Note: Detail may not add exactly to totals due to independent rounding.

UIC Program Burden Reduction Efforts

EPA is exploring several options to reduce the reporting burden and cost to respondents, while maintaining the protective components of the UIC Program. These are briefly described below and are discussed in further detail in Appendix D.

Combining/Revising the Reporting Forms: EPA is exploring whether redesigning some of the UIC Program's forms would reduce data collection burden, eliminate confusion, and facilitate completion of the forms. Potential targets for this redesign include forms 7520-9 (Completion Form for Injection Wells); 7520-10 (Completion Report for Brine Disposal, Hydrocarbon Storage, or Enhanced Recovery Wells); 7520-12 (Well Rework Record); and 7520-14 (Plugging and Abandonment Plan). EPA is also assessing the potential for combining several of the reporting forms, including the Completion forms (7520-9 and 7520-10), the Well Rework form (7520-12), and the Plugging and Abandonment Plan (7520-14) into a single multi-purpose form. EPA is also reviewing required reporting from injection well operators to states or DI programs to identify whether any of the information reported can be eliminated.

Increasing use of Electronic Reporting Methods: Taking advantage of electronic tools may help reduce reporting burden and recordkeeping costs. EPA is exploring avenues to increase the electronic reporting options available through the UIC Program.

- EPA is developing a National UIC database, which will allow electronic transfer of data between existing state and DI databases and Headquarters' database. When fully deployed, the national UIC database will eliminate the need for state UIC Program Directors to complete paper reporting forms, because Headquarters would be able to collect data for and prepare national annual reports using the information in the database. See additional discussion of the UIC database in Section 5(b) of this ICR and in Appendix B.

- EPA is also exploring a Web-based system through which Class V well operators could submit inventory and well closure information. This system, if implemented, will make two existing UIC reporting forms (Form 7520-16, Well Inventory form and 7520-17, Class V Well Pre-Closure Notification form) available online. The Web entry option would offer many benefits to operators and oversight agencies, including: reducing burden and cost to operators (e.g., no need to mail the hardcopy form); eliminating physical data entry for States and any potential transcription errors; and facilitating the notification process associated with the submissions.

Reducing Reporting Frequency: EPA is reviewing the UIC requirements to determine whether it is possible to reduce reporting frequency (and therefore reporting burden). EPA found that monitoring and testing activities account for nearly half of the total operator burden, and has examined these areas for possible burden reduction and identified some follow-up activities to determine whether burden reduction is possible.

6(g) Burden Statement

EPA estimates that, over the 3 years covered by this request, the total annual burden on underground injection well owners/operators and primacy agencies associated with UIC requirements will be 1,000,648 hours and the present value cost will be $139.6 million per year.

Exhibit 6-7
Annual Burden and Cost Associated with All Well Classes
2007-2010

Respondent Type	Burden (hours)	Labor Cost	Non-Labor Cost	Total Cost	Responses	Burden/ Response	Cost/ Response
Operators	840,985	$28,862,868	$104,248,907	$133,111,775	375,754	2.24	$354.25
Primacy States	159,663	$6,071,494	$448,922	$6,520,416	49,897	3.20	$130.68
Respondent total	**1,000,648**	**$34,934,361**	**$104,697,829**	**$139,632,191**	**425,652**	**2.35**	**$328.04**
EPA	22,466	$854,801	$0	$854,801	12,489	1.80	$68.45
TOTAL	**1,023,114**	**$35,789,162**	**$104,697,829**	**$140,486,991**	**438,140**	**2.34**	**$320.64**

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 2.35 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR part 9 and 48 CFR chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID No. EPA-HQ-OW-2003-0017, which is available for public viewing at the Water Docket in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the Water Docket is (202) 566-2426. An electronic version of the public docket is available through http://www.regulations.gov. Use www.regulations.gov to submit or view public comments, access the index listing of the contents of the public docket, and to access

those documents in the public docket that are available electronically. Once in the system, select "search," then key in the docket ID number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Office for EPA. Please include the EPA Docket ID No. EPA-HQ-OW-2003-0017, and OMB control number 2040-0042 in any correspondence.

Appendix A: Detailed Explanation of Respondent Burden Estimates and Respondent Universe

Respondents for this information collection include operators of Class I – V wells and state primacy agencies. The first part of this Appendix contains EPA's estimates of respondent burden associated with UIC paperwork requirements. The second part of this Appendix provides EPA's assumptions about the number of respondents subject to each information collection activity.

A.1 Estimating Respondent Burden

EPA has calculated respondent burden hours for each information collection, reporting, and recordkeeping activity required of well operators and state primacy agencies. Because required data items vary by well class, separate operator and state burden estimates have been prepared for each class. Tables A-1 through A-6 contain detailed estimates of the number of respondents and unit burden hours for required paperwork-related activities.

EPA recognizes that many UIC information collection activities are performed by contractors. The operator unit burdens reported in this section represent a composite of operator time to both perform an information collection activity, and to supervise a contractor when the contractor performs the activity. The mix of operator versus contractor labor varies by activity and by well class. Contractor costs are included in the estimates of operator unit costs.

Burden Associated with Class I Wells

EPA's estimate of the annual paperwork burden on operators for permitting, monitoring and testing, reporting and recordkeeping, and closing their facilities and state burden for administering Class I hazardous and Class I nonhazardous programs are presented in Tables A-1A and Table A-1B, respectively. Legal, managerial, technical, and clerical staff hours are shown; Column A presents the total unit burden for each activity.

Table A-1A

Annual Paperwork Burden and Costs Associated with Class I Hazardous Wells: Operators

						A	B	C	D	E	F
		Hours and Costs per Response							Total Hours and Costs		
Description of Requirement	**Frequency (A)**	**Legal**	**Managerial**	**Technical**	**Clerical**	**Unit Burden**	**Unit Labor Cost**	**Unit Non-labor Cost (B)**	**No. of Responses**	**Total Hours/Year**	**Total Cost/Year**
Initial/Startup Requirements (Per Permit Application)											
Requirements associated with permit applications											
Read permit application directions.	One-time	0.0	0.25	0.25	0.0	0.5	$27	$0	8	4	$217
Gather and submit description of activities requiring a permit, facility name and address, SIC codes, ownership and facility status, facility location, listing of relevant permits or construction approvals, description of the business.	One-time	3.0	2.0	9.0	6.0	20.0	$875	$0	8	160	$7,003
In DI programs, gather and submit a list of landowners within one-quarter mile of the facility boundary.	One-time	4.0	0.0	0.0	1.2	5.2	$350	$0	2	10	$682
Prepare and submit a map and tabulation of all wells within the AoR.	One-time	0.0	1.5	5.5	0.0	7.0	$319	$20,163	8	56	$163,855
Prepare and submit AoR protocol.	One-time	0.0	0.0	1.3	0.0	1.3	$51	$781	8	10	$6,654
Prepare and submit maps/cross sections of local and regional geology, USDWs.	One-time	0.0	1.5	16.0	0.0	17.5	$728	$41,862	8	140	$340,714
Develop formation testing and stimulation programs and injection procedures.	One-time	0.0	2.0	5.0	1.0	8.0	$358	$6,009	8	64	$50,938
Prepare and submit contingency plans for shut-ins or well failures.	One-time	0.0	3.0	10.0	2.0	15.0	$647	$234	8	120	$7,046
Prepare and submit ambient monitoring plan.	One-time	0.0	3.0	0.0	0.0	3.0	$206	$3,939	8	24	$33,161
Prepare and submit Corrective Action Plan.	One-time	0.0	2.0	3.0	2.3	7.3	$312	$9,981	8	58	$82,347
Prepare and submit descriptions of logs and tests, construction schematics & operating data.	One-time	0.0	2.0	8.0	5.0	15.0	$572	$5,007	8	120	$44,634
Prepare and submit closure plan, including demonstration of financial responsibility.	One-time	0.0	1.0	3.0	2.6	6.6	$249	$1,476	8	53	$13,800
Prepare and submit post-closure care plan.	One-time	0.0	1.4	2.0	1.4	4.8	$208	$1,816	8	38	$16,196
Requirements for active hazardous waste facilities											
Gather and submit dates of well operation and specific waste information.	One-time	0.0	0.0	26.6	11.4	38.0	$1,311	$7,611	8	304	$71,378
Gather and submit hazardous waste release information.	One-time	0.0	1.9	30.4	22.8	55.1	$1,867	$3,806	0	0	$0
Develop waste analysis plan.	One-time	0.0	1.9	15.2	1.9	19.0	$770	$2,537	8	152	$26,459

Table A-1A

Annual Paperwork Burden and Costs Associated with Class I Hazardous Wells: Operators

						A	B	C	D	E	F
		Hours and Costs per Response							Total Hours and Costs		
Description of Requirement	**Frequency (A)**	**Legal**	**Managerial**	**Technical**	**Clerical**	**Unit Burden**	**Unit Labor Cost**	**Unit Non-labor Cost (B)**	**No. of Responses**	**Total Hours/Year**	**Total Cost/Year**
Prepare and submit schedule of construction logs and tests.	One-time	0.0	0.0	0.5	0.5	1.0	$32	$0	8	8	$252
Requirements associated with completion reports											
Prepare and submit completion report.	One-time	0.0	0.0	1.5	2.5	4.0	$119	$0	8	32	$951
Submit results of deviation checks, other logs and tests; sample formation fluids; test injection and confining zones.	One-time	0.0	0.0	6.0	1.0	7.0	$258	$30,712	8	56	$247,757
Demonstrate mechanical integrity (i.e., casing pressure test, radioactive tracer survey of bottom-hole cement, and noise/temperature logs to check for movement along the borehole).	One-time	0.0	2.0	18.0	0.0	20.0	$840	$20,030	8	160	$166,958
Submit information on the anticipated maximum pressure and flow rate.	One-time	0.0	0.0	2.0	0.0	2.0	$78	$134	8	16	$1,691
Submit results of the injection zone and confining zone testing programs.	One-time	0.0	1.0	4.0	0.0	5.0	$226	$33,383	8	40	$268,864
Submit actual injection procedure.	One-time	0.0	0.0	1.0	0.0	1.0	$39	$134	8	8	$1,380
Demonstrate hydrogeologic compatibility/ compatability of well materials.	One-time	0.0	2.0	6.0	0.0	8.0	$373	$6,677	8	64	$56,398
Prepare and submit information on the calculated AoR.	One-time	0.0	0.0	2.0	0.0	2.0	$78	$2,671	8	16	$21,988
No-migration petition requirements											
Gather and submit waste information and present modeling data to demonstrate that wastes will not migrate from injection zone.	One-time	0.0	24.0	120.0	30.0	174.0	$7,072	$701,033	8	1,392	$5,664,836
Requirements associated with permit renewals/modifications and petition modifications											
Submit updated components of permit application attachments.	Occasional	0.0	9.0	41.5	21.0	71.5	$2,751	$9,881	12	858	$151,592
Prepare and submit request for Permit Modification.	One-time	0.0	2.0	6.0	2.0	10.0	$422	$5,742	5	50	$30,817
Prepare and submit Petition Modification.	One-time	0.0	24.0	120.0	30.0	174.0	$7,072	$663,613	6	1,044	$4,024,112
Monitoring/Testing Requirements (Per Facility)											
Use continuous recording devices to monitor injection pressure, flow rate, volume, and temperature.	Continuous	0.0	0.0	5.7	0.0	5.7	$222	$0	63	357	$13,897
Conduct chemical monitoring of injected wastes as prescribed in waste analysis plan.	As specified in WAP	0.0	0.0	38.0	0.0	38.0	$1,479	$4,006	251	9,520	$1,374,164

Table A-1A

Annual Paperwork Burden and Costs Associated with Class I Hazardous Wells: Operators

						A	B	C	D	E	F
		Hours and Costs per Response							Total Hours and Costs		
Description of Requirement	**Frequency (A)**	**Legal**	**Managerial**	**Technical**	**Clerical**	**Unit Burden**	**Unit Labor Cost**	**Unit Non-labor Cost (B)**	**No. of Responses**	**Total Hours/Year**	**Total Cost/Year**
Conduct additional chemical monitoring as specified by the Director.	Varies	0.0	0.0	7.6	0.0	7.6	$296	$801	25	190	$27,483
Conduct casing pressure test and radioactive tracer survey of bottom-hole cement.	Annual	0.0	3.8	5.2	0.0	9.0	$468	$5,530	50	451	$300,523
Conduct casing pressure test, radioactive tracer of bottom-hole cement, and noise/temperature logs to check for movement along the borehole.	Every 5 years	0.0	1.0	7.0	0.0	8.0	$342	$38,056	13	100	$480,990
Conduct casing inspection log at workover.	Occasional	0.0	3.8	8.0	0.0	11.8	$577	$6,636	3	37	$22,588
Conduct pressure fall-off test.	Annual	0.0	6.0	18.0	0.0	24.0	$1,120	$15,484	63	1,503	$1,039,927
Conduct ambient monitoring.	Annual	0.0	0.4	1.9	0.0	2.3	$100	$5,341	63	143	$340,822
Reporting Requirements (Per Facility)											
Prepare and submit report on maximum injection pressure, total injectate volume, and monitoring and testing results.	Quarterly	0.0	4.0	15.0	6.0	25.0	$1,008	$0	251	6,263	$252,581
Prepare and submit report on mechanical integrity testing.	Annual	0.0	1.0	2.0	1.0	4.0	$172	$1,202	63	251	$86,032
Notify Director within 24 hours of: planned physical changes to facility, changes that may result in noncompliance, compliance or noncompliance with a compliance schedule, any indication of possible endangerment of a USDW, or all other noncompliance.	Occasional	0.0	1.0	2.0	3.0	6.0	$220	$0	1	4	$138
Prepare and submit revised plugging and abandonment cost estimate.	Annual	0.0	1.0	0.0	0.0	1.0	$70	$0	63	63	$4,373
Prepare and submit report on: events exceeding operating parameters or triggering alarms; changes in annular fluid volume; workovers or other testing.	Occasional	0.0	1.0	1.0	1.0	3.0	$133	$0	3	9	$416
Recordkeeping Requirements (Per Facility)											
Maintain monitoring information, calibration and maintenance records, required reports, application data, monitoring results, and most recent plugging and abandonment cost estimate.	3 years	0.0	0.0	0.0	5.0	5.0	$121	$0	63	313	$7,570
Closure Requirements (Per Well)											
Prepare and submit notice of intent to close.	One-time	0.0	0.5	0.0	1.0	1.5	$59	$0	1	2	$59

Table A-1A

Annual Paperwork Burden and Costs Associated with Class I Hazardous Wells: Operators

						A	B	C	D	E	F
		Hours and Costs per Response							Total Hours and Costs		
Description of Requirement	**Frequency (A)**	**Legal**	**Managerial**	**Technical**	**Clerical**	**Unit Burden**	**Unit Labor Cost**	**Unit Non-labor Cost (B)**	**No. of Responses**	**Total Hours/Year**	**Total Cost/Year**
Prepare and submit closure report.	One-time	0.0	2.0	8.0	0.0	10.0	$451	$2,671	1	10	$3,122
Conduct pressure fall-off test prior to well closure.	One-time	0.0	1.0	5.0	0.0	6.0	$264	$15,484	1	6	$15,749
Demonstrate mechanical integrity (i.e., casing pressure test, radioactive tracer of bottom-hole cement, and noise/temperature logs to check for movement along the borehole) prior to closure.	One-time	0.0	2.0	18.0	0.0	20.0	$840	$24,996	1	20	$25,836
Notify state or local zoning or drilling authorities and Regional Administrator following closure.	One-time	0.0	0.5	1.0	3.0	4.5	$146	$0	1	5	$146
TOTAL									**1,201**	**24,304**	**$ 15,499,094**

Notes:

(A) EPA assumes that occasional notification will be included in the next quarterly report except where required within 24 hours.

(B) EPA assumes that there are no start-up costs; all non-labor costs are O & M costs.

EPA assumes one well per facility for start-up and closure activities; and 1.9 wells per facility for monitoring, testing and reporting.

Numbers may not add due to rounding.

Table A-1A (continued)
Annual Paperwork Burden and Costs Associated with Class I Hazardous Wells: States

		A	B	C	D	E	F
		Hours and Costs per Response			Total Hours and Costs		
Description of Requirement	**Frequency (A)**	**Unit Burden (B)**	**Unit Labor Cost**	**Unit Nonlabor Cost**	**Number of State Responses**	**Total State Hours/Year**	**Total State Cost/Year**
Initial/Start-up							
Permit Applications							
Consider the permit application, AoR, relevant maps and cross sections, fluid injection rate and volume, proposed contingency plans, monitoring plans, and construction procedures as required at 146.70 and prepare draft permit.	One-time	40.0	$1,522	$0	6	242	$9,204
Provide public notice of issuance of a draft permit or intent to deny.	One-time	1.0	$38	$0	6	6	$230
Consider public comments.	One-time	6.0	$228	$0	6	36	$1,381
Issue final permit decision.	One-time	2.0	$76	$0	6	12	$460
Respond to comments.	One-time	7.0	$266	$0	6	42	$1,611
Review notice of completion of construction.	One-time	2.0	$76	$0	6	12	$460
No-Migration Petitions							
Review and respond to petition request.	One-time	18.0	$685	$0	6	109	$4,142
Public notice/public comment.	One-time	10.0	$380	$0	6	60	$2,301
Review and respond to petition modification request.	One-time	10.0	$380	$0	5	45	$1,726
Permit renewals/modifications							
Review and respond to requests for permit modifications or re-issuance.	Occasional	30.0	$1,141	$0	9	272	$10,354

Table A-1A (continued)
Annual Paperwork Burden and Costs Associated with Class I Hazardous Wells: States

		A	B	C	D	E	F
		Hours and Costs per Response			Total Hours and Costs		
Description of Requirement	**Frequency (A)**	**Unit Burden (B)**	**Unit Labor Cost**	**Unit Nonlabor Cost**	**Number of State Responses**	**Total State Hours/Year**	**Total State Cost/Year**
Monitoring/Testing							
Review quarterly monitoring and testing results.	Quarterly	1.5	$57	$0	189	284	$10,808
Review casing pressure test and radioactive tracer survey of bottom-hole cement.	Annual	4.0	$152	$0	38	152	$5,764
Review casing pressure test, radioactive tracer survey of bottom-hole cement, and logs.	Every 5 years	4.0	$152	$0	9	38	$1,441
Review pressure fall-off test.	Annual	2.0	$76	$0	36	73	$2,774
Other Reporting							
Respond to periodic notifications by owners and operators.	Occasional	2.0	$76	$0	5	9	$345
Closure							
Review closure and post-closure plans prior to approving plugging and abandonment.	One-time	2.0	$76	$0	1	2	$76
Witness and review pressure fall-off test prior to authorizing closure.	One-time	24.0	$913	$0	1	24	$913
TOTAL					**388**	**1,420**	**$54,028**

Notes:

(A) For quarterly activities, the number of responses = number of facilities X 4.

(B) EPA assumes one well per facility for start-up and closure activities; and 1.9 wells per facility for all other activities.

Regions review 17 percent of MITs and 23 percent of pressure fall-off tests in primacy states.

Numbers may not add due to rounding.

Table A-1B
Annual Paperwork Burden and Costs Associated with Class I Nonhazardous Wells: Operators

						A	B	C	D	E	F
		Hours and Costs per Response							Total Hours and Costs		
Description of Requirement	**Frequency (A)**	**Legal**	**Managerial**	**Technical**	**Clerical**	**Unit Burden**	**Unit Labor Cost**	**Unit Non-Labor Cost (B)**	**No. of Responses**	**Total Hours/Year**	**Total Cost/Year**
Initial/Startup Requirements (Per Permit Application)											
Requirements associated with permit applications											
Read permit application directions.	One-time	0.0	0.25	0.25	0.0	0.5	$27	$0	14	7	$381
Gather and submit description of activities requiring a permit, facility name and address, SIC codes, ownership and facility status, facility location, listing of relevant permits or construction approvals, relevant maps and cross sections, construction specifics, description of the business, proposed injection, formation testing, and stimulation	One-time	3.0	2.0	9.0	6.0	20.0	$875	$0	14	280	$12,256
In DI programs, gather and submit a list of landowners within one-quarter mile of the facility boundary.	One-time	4.0	0.0	0.0	1.2	5.2	$350	$0	3	18	$1,194
Prepare and submit a map and tabulation of all wells within the AoR.	One-time	0.0	1.5	5.5	0.0	7.0	$319	$16,130	14	98	$230,289
Prepare and submit maps/cross sections of local and regional geology, USDWs.	One-time	0.0	1.5	16.0	0.0	17.5	$728	$41,862	14	245	$596,249
Prepare and submit descriptions of logs and tests, construction schematics and operating data.	One-time	0.0	2.0	8.0	2.5	12.5	$511	$5,007	14	175	$77,264
Develop formation testing and stimulation programs and injection procedures.	One-time	0.0	2.0	7.0	1.0	10.0	$436	$6,009	14	140	$90,232
Prepare and submit contingency plans for shut-ins or well failures.	One-time	0.0	3.0	10.0	2.0	15.0	$647	$234	14	210	$12,330
Prepare and submit ambient monitoring plan.	One-time	0.0	3.0	3.0	3.0	9.0	$399	$3,939	14	126	$60,730
Prepare and submit Corrective Action Plan.	One-time	0.0	2.0	3.0	2.3	7.3	$312	$7,678	14	102	$111,860
Prepare and submit closure plan, including demonstration of financial responsibility.	One-time	0.0	1.0	3.0	2.6	6.6	$249	$1,476	14	92	$24,149
Requirements associated with completion reports											
Prepare and submit completion report.	One-time	0.0	0.0	1.5	2.5	4.0	$119	$0	14	56	$1,664
Prepare and submit a report of deviation checks and other logs and tests during	One-time	0.0	0.0	6.0	1.0	7.0	$258	$30,712	14	98	$433,575
Demonstrate mechanical integrity (i.e., casing pressure test and noise/temperature logs to	One-time	0.0	2.0	3.5	0.0	5.5	$276	$8,679	14	77	$125,375
Submit information on the anticipated maximum pressure and flow rate.	One-time	0.0	0.0	2.0	0.0	2.0	$78	$134	14	28	$2,959

Table A-1B

Annual Paperwork Burden and Costs Associated with Class I Nonhazardous Wells: Operators

		Hours and Costs per Response				A	B	C	D	E	F
									Total Hours and Costs		
Description of Requirement	**Frequency (A)**	**Legal**	**Managerial**	**Technical**	**Clerical**	**Unit Burden**	**Unit Labor Cost**	**Unit Non-Labor Cost (B)**	**No. of Responses**	**Total Hours/Year**	**Total Cost/Year**
Submit results of the formation testing program.	One-time	0.0	1.0	4.0	0.0	5.0	$226	$33,383	14	70	$470,512
Submit actual injection procedure.	One-time	0.0	0.0	1.0	0.0	1.0	$39	$134	14	14	$2,414
Demonstrate hydrogeologic compatibility/ compatibility of well materials.	One-time	0.0	2.0	6.0	0.0	8.0	$373	$6,677	14	112	$98,696
Requirements associated with permit renewals/modifications											
Submit updated components of permit application attachments.	Occasional	0.0	8.0	11.0	2.0	21.0	$1,035	$4,674	20	420	$114,172
Prepare and submit request for permit modification.	Occasional	0.0	2.0	6.0	0.0	8.0	$373	$3,338	9	72	$33,403
Activities Associated with the Florida Rule											
Read and understand the rule.	One-time	0.0	0.0	6.7	0.0	6.7	$183	$0	16	107	$2,931
Prepare and submit revised permit application to inject effluent.	One-time	0.0	0.0	85.3	0.0	85.3	$2,332	$0	16	1,365	$37,314
Monitoring/Testing Requirements (Per Facility)											
Analyze injected fluids.	Per permit	0.0	0.0	38.0	0.0	38.0	$1,479	$2,671	905	34,400	$3,756,669
Monitor injection pressure, flow rate and volume, and annulus pressure.	Continuous	0.0	0.0	5.7	0.0	5.7	$222	$0	226	1,290	$50,215
Demonstrate mechanical integrity (i.e., casing pressure test and noise/temperature logs to check for movement along the borehole).	Every 5 years	0.0	1.0	8.0	0.0	9.0	$381	$16,491	45	407	$763,688
Conduct pressure fall-off test.	Annual	0.0	8.0	16.0	0.0	24.0	$1,181	$15,484	226	5,432	$3,771,701
Conduct ambient monitoring.	Annual	0.0	0.4	1.5	0.0	1.9	$86	$5,341	226	430	$1,228,193
Reporting Requirements (Per Facility)											
Report on: physical, chemical, and other characteristics of injected fluids; injection pressure, flow rate, and volume; and monitoring of USDWs.	Quarterly	0.0	0.0	4.0	12.0	16.0	$446	$0	905	14,484	$403,554
Report results of ambient monitoring and pressure fall-off test.	Annual	0.0	2.0	6.0	4.0	12.0	$470	$1,106	226	2,716	$356,563

Table A-1B

Annual Paperwork Burden and Costs Associated with Class I Nonhazardous Wells: Operators

		Hours and Costs per Response				A	B	C	D	E	F
									Total Hours and Costs		
Description of Requirement	**Frequency (A)**	**Legal**	**Managerial**	**Technical**	**Clerical**	**Unit Burden**	**Unit Labor Cost**	**Unit Non-Labor Cost (B)**	**No. of Responses**	**Total Hours/Year**	**Total Cost/Year**
Notify Director within 24 hours of: planned physical changes to facility, changes that may result in noncompliance, compliance or noncompliance with a compliance schedule, any indication of possible endangerment of a	Occasional	0.0	1.0	2.0	3.0	6.0	$220	$0	11	68	$2,492
Submit periodic updates of financial responsibility for closure that account for inflation.	Occasional	0.0	1.0	0.0	0.0	1.0	$70	$0	75	75	$5,267
Report results of: any required mechanical integrity tests, other required tests, and well workovers.	Occasional	0.0	1.0	2.0	1.0	4.0	$172	$1,202	2	9	$3,109
Recordkeeping Requirements (Per Facility)											
Maintain monitoring information, calibration and maintenance records, required reports, application data, and monitoring results.	At least 3 years	0.0	0.0	0.0	4.0	4.0	$97	$0	226	905	$21,883
Closure Requirements (Per Well)											
Notify the Director before conversion or abandonment of the well or, in the case of area permits, before closure of the project.	One-time	0.0	0.5	0.0	1.0	1.5	$59	$0	1	2	$59
TOTAL									**3,380**	**64,130**	**$ 12,903,342**

Notes:

(A) EPA assumes that occasional notification will be included in the next quarterly report except where required within 24 hours.

(B) EPA assumes that there are no start-up costs; all non-labor costs are O & M costs.

EPA assumes one well per facility for start-up and closure activities; and 1.9 wells per facility for monitoring, testing and reporting.

Numbers may not add due to rounding.

Table A-1B (continued)
Annual Paperwork Burden and Costs Associated with Class I Nonhazardous Wells: States

		A	B	C	D	E	
		Hours and Costs per Response			Total Hours and Cost		
Description of Requirement	**Frequency (A)**	**Unit Burden (B)**	**Unit Labor Cost**	**Unit Non-Labor Cost**	**Number of State Responses**	**Total State Hours/Year**	**Total State Cost/Year**
Initial/Start-up							
Permit applications							
Consider the permit application, AoR, relevant maps and cross sections, fluid injection rate and volume, proposed contingency plans, monitoring plans, and construction procedures as required at 146.14 and issue notice of intent to deny.	One-time	20.0	$761	$0	1	21	$805
Consider the permit application, AoR, relevant maps and cross sections, fluid injection rate and volume, proposed contingency plans, monitoring plans, and construction procedures as required at 146.14 and prepare draft permit.	One-time	40.0	$1,522	$0	10	381	$14,496
Provide public notice of issuance of a draft permit or intent to deny.	One-time	1.0	$38	$0	11	11	$403
Consider public comments.	One-time	6.0	$228	$0	11	63	$2,416
Issue final permit decision.	One-time	2.0	$76	$0	11	21	$805
Respond to comments.	One-time	7.0	$266	$0	11	74	$2,819
Review notice of completion of construction.	One-time	2.0	$76	$0	11	21	$805
Permit renewals/modifications							
Review and respond to requests for permit modifications or re-issuance.	Occasional	30.0	$1,141	$0	15	454	$17,257
Activities associated with the Florida Rule							
Read and understand rule.	One-time	13.3	$422	$0	1	13	$422
Revised primacy application.	One-time	346.7	$11,001	$0	1	347	$11,001

Table A-1B (continued)

Annual Paperwork Burden and Costs Associated with Class I Nonhazardous Wells: States

		A	B	C	D	E	
		Hours and Costs per Response			Total Hours and Cost		
Description of Requirement	**Frequency (A)**	**Unit Burden (B)**	**Unit Labor Cost**	**Unit Non-Labor Cost**	**Number of State Responses**	**Total State Hours/Year**	**Total State Cost/Year**
Review revised permit applications to inject effluent.	One-time	10.7	$340	$0	16	171	$5,432
Monitoring/Testing							
Review casing pressure test and logs.	Every 5 years	4.0	$152	$0	34	137	$5,207
Review pressure fall-off test.	Annual	2.0	$76	$0	171	342	$13,018
Review monitoring data submitted by operators.	Quarterly	2.0	$76	$0	684	1,369	$52,073
Other Reporting							
Respond to periodic notifications by owners and operators.	Occasional	1.0	$38	$0	8	8	$288
Closure							
Review plugging and abandonment report.	One-time	1.0	$38	$0	1	1	$38
TOTAL					**995**	**3,434**	**$127,285**

Notes:

(A) For quarterly activities, the number of responses = number of facilities X 4.

(B) EPA assumes one well per facility for start-up and closure activities; and 1.9 wells per facility for all other activities.

Regions review 17 percent of MITs and 23 percent of pressure fall-off tests in primacy states.

Numbers may not add due to rounding.

Class I facility operators rely on contractors to assist them with most information collection activities, including initial/start-up activities (e.g., permit applications, completion reports, and no-migration petitions); monitoring and testing (e.g., ambient monitoring, pressure fall-off tests, and MITs); closure-related reporting; and other paperwork activities (e.g., permit and petition modifications). The operator burdens presented in Column A of Tables A-1A and A-1B largely reflect the time to provide contractor oversight and furnish information to contractors. The costs associated with contractor labor and other contractor services are presented in Column C of Tables A-1A and A-1B.

EPA estimates that 70 percent of the new Class I permits issued will be for newly constructed wells at existing facilities, and that much of the information these applicants are required to submit is likely to have been developed in connection with permitting other wells and, therefore, already exists for the facility. EPA assumes the remaining 30 percent of permits will be issued for wells at new facilities, and the burden associated with applying for a permit will be greater. Thus, the unit burdens presented in this ICR are a composite of the burdens for permitting new wells at both new and existing facilities.

EPA assumes that some activities required of Class I permit applicants are customary business practices. The burden presented in this ICR is the incremental time and cost for presenting the information in a format acceptable to permitting authorities and for using EPA-approved tests.

- Knowledge of subsurface geology is necessary to site a well and locate a subsurface zone suitable for injection. EPA assumes that 50 percent of the geological characterization required of permit applicants is customary business practice. Most of the incremental ICR burden is attributable to the requirement for submitting detailed maps of local geology.

- Operators would customarily develop and conduct formation testing and stimulation programs for the same reasons they would develop geological data. EPA estimates that 50 percent of the required program development and testing is customary business practice.

- Operators would probably develop and retain contingency plans to reduce potential liability should a well failure occur and develop closure plans to reduce potential liability when they close their facility. EPA assumes that 25 percent of the burden to develop these plans is customary business practice.

- Facility engineers would normally prepare construction schematics and operating data during the planning and design of an injection facility; EPA estimates that 75 percent of the burden associated with compiling this data is customary business practice.

- As part of their overall industrial process, operators would normally develop injectate composition data and test the compatibility of the waste stream with well materials. EPA assumes that 50 percent of the time and cost to develop a waste analysis plan and to conduct waste compatibility testing is customary business practice.

- During construction, operators would probably conduct deviation checks and other logs to verify that drilling is progressing within expected parameters. EPA estimates that 50 percent of the requirement to conduct deviation checks and other logs and tests is customary business practice.

- Operators would routinely observe injection pressure, flow rate, volume, and temperature, and analyze the chemical composition of their wastes to verify the proper operation of their wells, EPA assumes that nearly all the burden for continuous monitoring and 75 percent of the burden to perform chemical analyses of their injectate is customary business practice.

Class I Hazardous Facilities

Operator activities associated with Class I hazardous facilities include: permitting and start-up related reporting; permit renewals and modifications of permits or petitions; monitoring; reporting and recordkeeping; and closure-related paperwork.

Initial Permitting/Start-up

EPA estimates that, of the new Class I hazardous waste facility operating permits that are issued each year, most will be for new wells at existing facilities. Thus, in some cases, operators will adapt existing materials for their permit applications. Note that for permitting activities, the unit burdens are expressed on a per-application basis.

EPA estimates that the operator burden associated with applying for Class I hazardous waste injection permits will be 224 hours per permit. (This unit burden incorporates the above assumptions about customary business practices.) Table A-1A contains burden estimates for specific components of the permit application. EPA's calculation of operator burden and contractor labor costs above customary business practices is based on the following assumptions:

- Operators, rather than contractors, will gather the facility description and location information necessary to complete the permit application form;

- AoR studies in support of the application will encompass portions of previous AoR studies at the facility;

- The burden for developing a corrective action plan assumes that 10 percent of operators will be required to revise their corrective action plan at the request of the permitting authority; and

- The requirement that operators of active hazardous waste facilities gather and submit site investigation information [40 CFR 144.31(g)(3)] duplicates Resource Conservation and Recovery Act (RCRA) requirements and is not included in this burden estimate.

EPA estimates that the burden on Class I hazardous facility operators associated with preparing and submitting completion reports will be 49 hours per facility. The burden to perform specific activities related to completion reports is presented in Table A-1A. As with permitting activities, EPA anticipates that much of the testing reported in the completion report would normally be performed in the course of business.

In addition to submitting permit applications, operators of newly constructed hazardous Class I wells will submit no-migration petitions to the EPA Regional Administrator. EPA assumes that no-migration petition requirements impose an additional 174 burden hours on each operator. EPA anticipates that operators already have compiled much of the extensive data required to support a no-migration petition in the process of permitting and preparing petitions for existing wells at their facilities, during the permit application process, or as a customary business practice.

Permit Renewals and Modifications

Class I operating permits are valid for up to ten years, after which, operators must apply to renew their permits. Additionally, from time to time, operators of Class I hazardous facilities may need to modify their permits or their no-migration petitions. Paperwork submittals include: permit renewals, permit modifications, and petition modifications.

EPA anticipates that the burden associated with renewing permits for a Class I hazardous facility will be 71.5 hours per renewal. Requirements for permit renewals vary among states and regions, ranging from submitting a letter of intent to continue operating the facility to an application similar in scope to one for a new permit. EPA assumes that, for renewal applications, Class I hazardous facility operators will be required to submit facility identification information and those attachments that have changed or been updated since their last application, such as the AoR, corrective action plan, closure plan, waste identification information, and financial responsibility information. EPA assumes that Class I hazardous facility operators will not be required to submit no-migration petitions in support of permit renewal applications.

EPA estimates the operator burden for overseeing contractor activities associated with preparing and submitting a request for a permit modification is 10 hours per facility, and the burden associated with modifying a no-migration petition is 174 hours.

Monitoring/Testing

As indicated above, EPA assumes that operators of Class I hazardous facilities would routinely observe injection pressure, flow rate, volume, and temperature in the normal course of business. EPA estimates an incremental annual burden of 5.7 hours per facility beyond customary business practice.

Class I hazardous facility operators must also monitor the chemical composition of their wastes according to the waste analysis plan submitted with their permit application. As with monitoring of injection pressure, flow rate, and volume, EPA assumes that operators would perform some chemical monitoring during the course of business. EPA estimates the additional annual burden for chemical monitoring is 38 hours per facility per quarter for operators to collect samples and send them to commercial laboratories for analysis. In addition, EPA assumes that, for various reasons, permitting authorities will require 10 percent of facilities to conduct additional monitoring under 40 CFR 146.68(a)(3), and that the total burden will be 7.6 hours per facility per quarter. EPA assumes that all monitoring will be conducted quarterly.

The burden associated conducting annual MITs (i.e., conducting a casing pressure test and radioactive tracer survey), and five-year MITs, which also include temperature, noise, or other logs to check for movement along the borehole is estimated to be 8 hours per facility.

Operators must conduct casing inspection logs when their wells are worked over. EPA estimates the total annual burden will be 12 hours per log.

Class I hazardous facility operators must conduct a pressure fall-off test every year; EPA estimates that the annual burden associated with this requirement will be 24 hours per facility. EPA estimates that the total burden associated with required annual ambient monitoring at Class I hazardous facilities will be 2.3 hours per facility.

Reporting and Recordkeeping

Operators of Class I hazardous facilities will spend 104 hours per facility reporting the results of required monitoring and testing each year: this includes 25 hours per report (100 hours annually) for quarterly monitoring reports, and 4 hours to report on the results of MITs. In addition, EPA assumes that 5 percent of operators will spend 3 to 6 hours annually submitting occasional reports (e.g., on changes to the facility; planned workovers; noncompliance or anticipated noncompliance; or events triggering alarms or shutdown devices). Operators will also spend one hour submitting revised plugging and abandonment cost estimates.

EPA estimates the annual recordkeeping burden for Class I hazardous facilities to be 5 hours. Operators must maintain monitoring information, calibration and maintenance records, required reports, application data, and monitoring results for three years; and keep their most recent plugging and abandonment cost estimate for one year.

Closure

EPA estimates that the total annual burden associated with closure of a Class I hazardous well is 42 hours. This includes 1.5 hours to notify the Regional Administrator prior to closing, 6 hours to perform pressure fall-off tests, 20 hours for MITs, and 10 hours for a closure report. EPA assumes that the operator will not revise the closure plan or the post-closure care plan. The operator will also spend 4.5 hours on third-party notification activities, such as notifying state or local zoning or drilling authorities and the Regional Administrator following closure.

Class I Nonhazardous Facilities

Paperwork requirements for operators of Class I nonhazardous facilities include permitting and start-up related reporting, permit renewals and modifications, monitoring and testing, reporting and recordkeeping, and closure-related paperwork activities.

Initial Permitting/Start-up

As was the case for Class I hazardous facilities, EPA estimates that the majority of the new nonhazardous waste injection permits issued each year will be for new wells at existing facilities. Unit burdens are reported on a per-application basis.

Requirements associated with permit applications add 110 hours to the customary business activities of Class I nonhazardous facility operators. Column A of Table A-1B presents EPA's estimates of burdens for specific components of a permit application. Class I nonhazardous waste permit applicants must submit much of the same information as operators of hazardous facilities. EPA assumes that the burden on nonhazardous facilities is the same as that for Class I hazardous waste facilities, with the exception of the following:

- Class I nonhazardous facility operators will study a smaller AoR. Consequently, the burden for the AoR study and for developing a corrective action plan for wells in the AoR will be lower for these operators.

- Nonhazardous facility operators are not required to develop waste analysis plans or plans to reduce the quantity or toxicity of their injectate; nor are they required to gather and submit hazardous waste release information.

EPA estimates that the unit burden on Class I nonhazardous facility operators for preparing and submitting completion reports is 32.5 hours. This unit burden varies from that for Class I hazardous facilities, as Class I nonhazardous facility operators are not required to submit information on the calculated AoR. Burden estimates for specific activities associated with completion of new wells are presented in Column A of Table A-1B.

Permit Renewals/Modifications

As with hazardous facility operators, EPA assumes that applicants for nonhazardous injection permit renewals will submit only those attachments to the application form that have changed since the original application. Each renewal application will take an estimated 21 hours. EPA estimates the operator burden associated with contractor oversight to prepare and submit a request for a permit modification to be 8 hours.

Permitting Activities for Class I Municipal Disposal Facilities in Florida

Class I municipal well operators in Florida whose facilities have caused or may cause fluid movement and wish to continue injecting will submit applications to modify their permits to meet the requirements of the Florida Class I rule. EPA estimates that the average burden incurred by each Class I municipal well operator to meet the new requirements will be 276 hours (or 92 hours per year for the period covered by this ICR). Affected operators will undertake two information collection activities, as described below:

- Read and understand the rule. It is estimated that each Class I municipal well operator will require 20 hours (an average of 6.7 hours per year) to read the rule and understand its implications for future operations.

- Prepare and submit revised permit application. Because permits are already required under existing UIC regulations, the new permit is expected to be a one-time resubmission of an updated permit application. The operator burden for preparation and submission of a revised injection permit is estimated to be 256 hours (an average of 85.3 hours per year).

These burden estimates are consistent with the estimates in the ICR for the Class I Rule (EPA ICR number 370.17).

Monitoring/Testing

EPA assumes that operator staff will observe and record injection pressure, flow rate, volume and temperature and sample their injectate periodically as normal business activities; however to comply with UIC requirements, operators spend more time on these activities than they otherwise would. Class I nonhazardous facility operators will spend 38 hours per quarter to monitor their injectate; 5.7 hours to monitor injection pressure, flow rate, and volume; 1.9 hours to conduct ambient monitoring; and 24 hours to conduct an annual pressure fall-off test. In addition, approximately 20 percent of operators will spend 9 hours to demonstrate mechanical integrity (i.e., five-year MIT).

Reporting and Recordkeeping

Operators will spend 16 hours per facility reporting quarterly on the chemical and physical characteristics of injectate, flow rate, and volume. Class I nonhazardous facility operators will spend 12 hours per facility to report on the results of ambient monitoring and the pressure fall-off test.

EPA assumes that Class I nonhazardous facility operators will spend one hour each year to update and submit revised plugging and abandonment cost estimates. EPA also assumes that operators will spend 4 to 6 hours submitting additional reports (e.g., of changes to the facility; planned workovers; noncompliance or anticipated noncompliance; or events triggering an alarm or shutdown).

EPA estimates the annual recordkeeping burden on Class I nonhazardous facilities to maintain monitoring information, calibration and maintenance records, required reports, application data, and monitoring results for three years will be 4 hours per facility.

Closure

EPA estimates the annual burden on operators of Class I nonhazardous facilities associated with closure is 1.5 hours for notifying the Director.

Burden on Primacy Agencies Associated with Class I Wells

State primacy agencies' burden as users of data associated with implementing Class I programs arise from program oversight, reviewing and responding to permit applications and completion reports, monitoring and testing data, and closure reports submitted by operators within their states. State burden associated with oversight of Class I programs is presented in Column A of Tables A-1A and A-1B.

EPA estimates that states will spend from 20 to 62 hours per permit application reviewing applications for hazardous or nonhazardous Class I wells (depending on whether the permit is issued or denied), and 30 hours reviewing requests for permit modifications or renewals. EPA regional offices review all no-migration petitions and petition modification requests submitted by operators of Class I hazardous waste injection facilities; however, state primacy agencies assist the regions with this review. States spend 28 hours per no-migration petition application and 10 hours per petition modification request on this assistance.

The State of Florida will incur burden associated with the requirements of the rule for Class I municipal wells in Florida. Three information collection activities will be required:

- Reading and understanding the Rule: state regulators will require 40 hours (or 13.3 hours per year) for this activity.

- Revised primacy application: the State will reapply for primacy status in order to administer the new regulation. The burden for this application revision is estimated to be 1,040 hours (346.7 hours per year).

- Review of revised permits to inject effluent under the Rule: Florida, as the primacy agent, is expected to review and approve permit applications to inject wastewater under the rule. State burden for review and approval of revised permit applications is estimated to be approximately 32 hours (or 10.7 hours annually) per permit.

State primacy agencies spend from 2 to 4 hours per report reviewing monitoring and MIT data or occasional reports submitted by operators (details are presented in Tables A-1A and A-1B). States spend one hour reviewing plugging and abandonment reports submitted by operators of Class I nonhazardous waste facilities, and 26 hours reviewing reports and testing results associated with closure of hazardous waste facilities.

Burden Associated with Class II Wells

EPA's estimate of the annual paperwork burden on operators for permitting, monitoring and testing, reporting and recordkeeping, and closing wells, and state burden for administering Class II programs, are presented in Table A-2.

Class II Operators

Initial Permitting/Start-up

EPA anticipates that 28 percent of Class II permit applications will be for area permits and 73 percent will be for individual permits. On average, each area permit application will cover 3.1 wells. EPA estimates that 85 percent of the applications will be approved. EPA or state primacy agencies will deny applications that do not meet construction standards and others will be withdrawn by owners.

Table A-2

Annual Paperwork Burden and Costs Associated with Class II Wells: Operators

						A	B	C	D	E	F
		Hours and Costs per Response							Total Hours and Costs		
Description of Requirement	**Frequency**	**Legal**	**Managerial**	**Technical**	**Clerical**	**Unit Burden**	**Unit Labor Cost**	**Unit Non-Labor Cost**	**No. of Responses**	**Total Hours/Year**	**Total Cost/Year**
Initial/Start-up Requirements											
Requirements associated with permit applications (Per Permit Application)											
Read permit application directions.	One-time	0.0	0.0	0.5	0.5	1.0	$32	$0	1,411	1,411	$44,517
Gather and submit: a description of activities requiring a permit, facility name and address, SIC codes, ownership and facility status, facility location, listing of relevant permits or construction approvals, topographic maps, description of the business.	One-time	0.1	0.0	1.0	0.4	1.5	$57	$0	1,411	2,117	$79,875
For DI programs, gather and submit a list of all land owners within one quarter mile of the facility boundary.	One-time	0.2	0.0	0.0	1.0	1.2	$40	$168	71	85	$14,717
Prepare and submit plugging and abandonment plan.	One-time	0.0	0.6	4.8	0.6	6.0	$243	$0	1,411	8,466	$343,213
Show evidence of financial responsibility for closure.	One-time	0.0	5.0	5.0	10.0	20.0	$785	$0	1,411	28,220	$1,108,264
Prepare and submit proposed Corrective Action Plan.	One-time	0.0	0.3	2.9	0.2	3.4	$139	$0	141	480	$19,566
Prepare and submit revised Corrective Action Plan.	One-time	0.0	1.0	9.6	0.7	11.3	$460	$0	28	319	$12,993
Prepare and submit Area of Review map. (State/DI Program performs study)	One-time	0.0	0.0	1.0	0.0	1.0	$39	$33	314	314	$22,682
Prepare and submit Area of Review map and study.	One-time	0.0	0.1	2.9	2.0	5.0	$168	$182	266	1,337	$93,163
Prepare and submit proposed operating data.	One-time	0.0	0.1	1.8	0.1	2.0	$79	$0	1,411	2,822	$112,128
Prepare and submit geological data on the injection and confining zone.	One-time	0.0	0.5	8.0	1.0	9.5	$370	$0	1,411	13,405	$522,767
Prepare and submit name and depth to bottom of USDWs.	One-time	0.0	0.1	2.3	0.1	2.5	$99	$200	1,411	3,528	$422,206
Prepare and submit schematic of the well.	One-time	0.0	0.0	2.8	0.2	3.0	$114	$0	1,411	4,233	$160,613

Table A-2

Annual Paperwork Burden and Costs Associated with Class II Wells: Operators

						A	B	C	D	E	F
		Hours and Costs per Response							Total Hours and Costs		
Description of Requirement	**Frequency**	**Legal**	**Managerial**	**Technical**	**Clerical**	**Unit Burden**	**Unit Labor Cost**	**Unit Non-Labor Cost**	**No. of Responses**	**Total Hours/Year**	**Total Cost/Year**
Requirements associated with completion reports (Per Well)											
Prepare and submit completion report.	One-time	0.0	0.0	1.5	2.5	4.0	$119	$0	1,830	7,322	$217,494
Perform and report on appropriate logs and other tests during construction.	One-time	0.0	0.2	1.9	0.2	2.4	$97	$4,006	275	659	$1,126,577
Demonstrate mechanical integrity.	One-time	0.0	0.0	7.0	0.0	7.0	$272	$180	1,830	12,813	$828,718
Requirements associated with permit reviews/modifications (Per Permit/Per Operator)											
Respond to issues raised during permit review.	Every 5 years	0.0	0.5	2.0	0.5	3.0	$125	$0	1,440	4,319	$179,720
Prepare and submit request for permit modification.	Occasional	0.0	0.4	2.8	0.8	4.0	$156	$0	3,599	14,395	$562,342
Monitoring/Testing Requirements (Per Operator)											
Monitor the nature of injected fluids.	As necessary to obtain representative	0.0	0.0	2.0	0.0	2.0	$78	$40	57,580	115,161	$6,789,425
Record injection pressure, flow rate, and cumulative volume.	At least every 30 days.	0.0	0.0	0.6	0.3	0.8	$29	$0	172,741	145,103	$4,934,767
Demonstrate mechanical integrity.	Every 5 years	0.0	0.0	3.0	0.0	3.0	$117	$1,803	28,790	86,371	$55,260,907
Reporting Requirements (Per Operator)											
In DI programs, gather and submit groundwater monitoring data, analyses of injected fluids, a description of geologic strata, and other items as requested.	Occasional	0.0	3.0	22.0	5.0	30.0	$1,187	$0	3	96	$3,782
In DI programs, notify Regional Administrator 30 days prior to MIT.	Every 5 years	0.0	0.0	0.5	0.5	1.0	$32	$0	15	15	$482
Notify Director of (1) any planned physical changes to facility; (2) changes that may result in noncompliance, (3) permit transfers, (4) compliance or noncompliance with compliance schedules, (5) possible endangerment to a USDW.	Occasional	0.0	1.0	1.5	2.5	5.0	$189	$0	864	4,319	$162,929
Report monitoring data, including monthly records of injected fluids, any changes in characteristics or sources of injected fluids.	Annual	0.0	0.0	3.3	1.7	5.0	$170	$0	14,395	71,976	$2,447,093
Report MIT results.	Annual	0.0	0.0	1.0	0.0	1.0	$39	$0	2,879	2,879	$112,070

Table A-2

Annual Paperwork Burden and Costs Associated with Class II Wells: Operators

						A	B	C	D	E	F
		Hours and Costs per Response							Total Hours and Costs		
Description of Requirement	**Frequency**	**Legal**	**Managerial**	**Technical**	**Clerical**	**Unit Burden**	**Unit Labor Cost**	**Unit Non-Labor Cost**	**No. of Responses**	**Total Hours/Year**	**Total Cost/Year**
Recordkeeping Requirements (Per Operator)											
Retain records of permitting data, nature and composition of injected fluids, and all monitoring results.	At least 3 years	0.0	0.0	1.0	3.0	4.0	$111	$0	14,395	57,580	$1,604,284
Closure Requirements (Per Operator)											
In DI programs, notify director of revisions to plugging and abandonment plan.	One-time	0.0	0.5	2.5	1.0	4.0	$156	$0	1	2	$82
Notify the Director before conversion or abandonment of the well, or in the case of area permits, before closure of the project.	One-time	0.0	1.0	0.0	2.0	3.0	$118	$0	1,044	3,132	$123,362
In DI programs, submit a plugging and abandonment report within 60 days after plugging a well.	One-time	0.0	0.0	4.5	1.5	6.0	$211	$240	52	313	$23,601
Other Requirements (Per Operator)											
In DI programs, submit revised demonstration of financial responsibility.	Occasional	0.0	0.5	0.5	1.0	2.0	$79	$0	72	144	$5,658
TOTALS									**313,913**	**593,332**	**$ 77,339,997**

Note: Numbers may not add due to rounding.

Table A-2 (continued)
Annual Paperwork Burden and Costs Associated with Class II Wells: States

		Hours and Costs per Response			Total Hours and Cost		
Description of Requirement	**Frequency**	**Unit Burden**	**Unit Labor Cost**	**Unit Non-Labor Cost**	**Number of Responses**	**Total Hours/Year**	**Total Cost/Year**
Initial/Start-up							
Permit applications (Per Permit Application)							
Review permit application and supporting documentation and prepare draft permit.	One-time	6.0	$228	$0	1,340	8,042	$305,996
Consider public comments.	One-time	2.0	$76	$0	1,340	2,681	$101,999
Issue final permit decision.	One-time	2.0	$76	$0	1,340	2,681	$101,999
Respond to comments.	One-time	4.0	$152	$0	1,340	5,362	$203,998
Review operator's AoR map and study.	One-time	5.0	$190	$0	253	1,264	$48,087
Review operator's AoR map and perform AoR study.	One-time	2.5	$95	$0	314	784	$29,838
Review completion report.	One-time	2.0	$76	$0	1,739	3,478	$132,317
Permit reviews/modifications (Per Operator)							
Review each permit to determine whether it should be modified, revoked and reissued, or terminated.	Every 5 years	1.0	$38	$0	1,367	1,367	$52,030
Review request for permit modification or re-issuance.	Occasional	4.0	$152	$0	3,419	13,675	$520,299
Monitoring/Testing (Per Operator)							
Review mechanical integrity test data submitted by operators.	Every 5 years	0.5	$19	$0	2,735	1,367	$52,030
Review monitoring data submitted by operators.	Annual	0.3	$10	$0	13,675	3,419	$130,075
Recordkeeping							
Maintain administrative record in DI programs.	One-time	1.0	$38	$0	0	0	$0

Table A-2 (continued)
Annual Paperwork Burden and Costs Associated with Class II Wells: States

		Hours and Costs per Response			Total Hours and Cost		
Description of Requirement	**Frequency**	**Unit Burden**	**Unit Labor Cost**	**Unit Non-Labor Cost**	**Number of Responses**	**Total Hours/Year**	**Total Cost/Year**
Other Reporting (Per Operator)							
Respond to periodic notifications by owners and operators.	Occasional	2.0	$76	$0	820	1,641	$62,436
Closure (Per Operator)							
For DI programs, review plugging and abandonment report.	One-time	1.0	$38	$0	0	0	$0
TOTAL					**29,722**	**45,761**	**$1,741,103**

Note: Numbers may not add due to rounding

The average burden for preparing permit application forms and the supporting documentation is approximately 67 hours per application. The time that a particular operator will spend on a permit application will likely vary, depending on the specific state submission requirements, the operator's level of experience, whether the application is for an individual or an area permit, the use of contractors, and other factors. The following paragraphs summarize the burdens for various components of a Class II permit application.

EPA estimates that operators will spend 2.5 hours per applicant to read the application directions and fill out the permit application form. With respect to the supporting documentation, EPA assumes that operators would normally prepare a well schematic and some geological, hydrogeological, and operating data in the course of business, and/or utilize existing data for the project. For area permits, the operator generally submits supporting data for a representative well. Table A-2 provides estimates of the time beyond customary business practice required to prepare the attachments to a Class II permit application. EPA estimates that permit applicants will spend an average of:

- 9.5 hours to prepare geological data on injection and confining zones;
- 6 hours to prepare plugging and abandonment plans;
- 2.5 hours to determine the name and depth to the bottom of USDWs;
- 3 hours to prepare schematics of the wells;
- 2 hours to prepare proposed operating data; and
- 20 hours to prepare financial responsibility information.

Based on previous studies of state AoR practices and requirements, EPA projects that state primacy agencies and EPA Regions will determine that a complete AoR is not necessary for approximately 60 percent of Class II permit applicants.[1] A complete AoR study may not be performed because the:

- AoR is entirely overlapped by the AoRs of wells previously studied.
- State primacy agency has cross-referenced AoR studies, ensuring AoR coverage.
- Operator has been granted a state variance based on factors relating to geologic setting, and/or well conditions.

[1] The Cadmus Group, Inc., *Technical Issues Paper for Developing Area of Review Guidance (Draft),* Contract No. 68-C4-0011, Work Assignment No. 1-38 (September 8, 1995).

- Well is located in a unitized project, and many of the elements of AoR studies were previously performed during unitization.

Previous EPA studies also have shown that many state primacy agencies perform all or most of the tasks involved in the AoR study. In these cases, the operator typically submits only a map of the AoR and a list of wells in the AoR. EPA projects that approximately 19 percent of applicants will submit an AoR map and an AoR study as part of the permit application. Each AoR map and study will require an average of 5 hours of operator time.[2] Another 22 percent of applicants will submit an AoR map and a listing of the wells in the AoR, and the state primacy agency will perform most or all of the tasks involved in the AoR study. The operator time to prepare the map and listing of wells is about one hour.

Based on the historical incidence of corrective action, EPA estimates that 90 percent of permit applicants will submit brief corrective action plans demonstrating that corrective action is not necessary to address potential conduits to USDWs in the AoR. Each of these plans will require one hour to prepare. The remaining 10 percent of applicants will submit more complex corrective action plans to address specific problems identified by the AoR study. Each comprehensive corrective action plan will take approximately 25 hours to prepare. Thus, the average time to prepare a corrective action plan is 3.4 hours. EPA regional or state primacy staff will require 20 percent of applicants to revise their complex corrective action plans. Each revised plan will take about 11.3 hours to prepare.

Unless exempted by the Director, operators in DI programs are required to submit a list of landowners within ¼ mile of the facility boundary. EPA estimates that these applicants will each take 1.2 hours to research property ownership records and prepare the list. This unit burden assumes that operators will supply about 30 percent of the effort, and the remaining 70 percent will be performed by contractors.

Prior to obtaining approval to begin injection, operators must submit completion reports for each new Class II well. With the completion report, operators must submit results of MITs and any well logs and tests required by the Director. Operators will take approximately 4 hours per well to fill out the completion form and gather the supporting documentation. The MIT will require approximately 7 hours of operator time, given current MIT practices for various completion types.

Most operators will submit logs for offset wells in their projects. EPA projects that Directors will require some permit applicants to perform and report on new well logs and tests, such as cement bond, temperature, or density logs. Directors are more likely to require additional logs and tests for II-D wells than for II-R wells. EPA assumes that operators will perform additional logs and tests for 50 percent of new II-D wells and 5

[2] EPA estimates that some operators will utilize contract AoR services. The unit burden for operators assumes that operators will perform about 67 percent of the AoR burden themselves and contract out for the remaining 33 percent.

percent of new II-R wells. Each of the logs and tests will take approximately 2.4 hours of operator time, primarily to supervise contractors.

Permit Reviews/Modifications

Class II permits are valid "up to the operating life of the facility" [40 CFR 144.36]. While the regulations do not require permit renewals, most permits are reviewed every five years. These reviews may be formal compliance reviews or informal reviews, usually conducted in conjunction with reviews of MIT results. Operators may be required to respond to any issues raised during the permit review. For purposes of calculating operator burden, EPA assumes that each operator will take 3 hours to respond to issues raised during the review.

Operators occasionally submit requests for permit modifications in response to changes in well ownership or injection practices, to add wells to existing area permits, and for other reasons. EPA expects that the average time to prepare each request is 4 hours.

Monitoring/Testing

For purposes of estimating the number of respondents for monitoring and testing, EPA assumes that the typical Class II operator has approximately 10 wells. An operator with wells in multiple states is treated as separate operators, since the operator would have to submit separate reports to each state primacy agency or EPA regional office.

In general, all operators located in DI programs and operators of commercial II-D wells in primacy states are required to submit annual injectate analyses. EPA estimates that approximately 40 percent of Class II operators submit annual injectate analyses each year. EPA assumes that operators submit samples for approximately 20 percent of their wells. Each operator takes 2 hours (1 hour per well) per year to sample and analyze their injectate. This includes the time for operators to analyze their injectate or, in some cases, send it to a commercial laboratory for analysis.

Most operators are required to observe injection pressure, flow rate, and cumulative volume weekly for II-D wells and monthly for II-R wells. EPA anticipates that operators, especially operators of II-R wells, perform periodic observations of pressure, flow rate, and cumulative volume as a customary business practice. Thus, the incremental time to perform these observations is about 0.83 hours per operator (0.08 hours, or 5 minutes, per well) per month. This represents the time to record the data on a field report.

EPA assumes that 20 percent of operators will perform MITs on their wells each year. Each operator will spend 3.0 hours (0.3 hours per well) performing MITs. The unit burden assumes that contractors perform many of the tasks involved in an MIT.

Reporting and Recordkeeping

Each year, Class II operators spend about 5 hours to prepare annual monitoring reports. These reports include summaries of monthly or weekly observations of flow, pressure, and cumulative volume. In addition, 20 percent of operators will spend 1 hour per operator to prepare reports on MITs performed.

From time to time, operators submit other reports or notify UIC staff of various events. These include notifications of planned changes to the injection facility, permit transfers, progress in achieving compliance milestones, and noncompliance or malfunctions which may endanger a USDW. EPA estimates that approximately 6 percent of operators submit one of these occasional reports each year. Operators will spend an average of 5 hours to prepare each report.

Operators of rule-authorized wells in DI states may be required to gather and submit groundwater monitoring data, analyses of injected fluids, a description of geologic strata, and other items as requested. EPA projects that each request will take 30 hours to prepare. In addition, operators of rule-authorized wells will spend one hour per operator to notify the Region prior to performing MITs.

Each operator will spend about 4 hours annually to maintain records on permitting, monitoring, and testing.

Closure

Each operator that closes a well will spend about 3.0 hours (0.3 hours per well) to notify UIC officials prior to abandoning the wells.

In addition, EPA assumes that operators in DI programs who elect to plug their wells in a manner different from the one specified in their plugging and abandonment plans will spend 4 hours to prepare revised plugging and abandonment plans. In addition, operators who plug wells in DI programs will spend 6 hours to prepare and submit plugging and abandonment reports.

Other Activities

DI programs may require some operators of wells with lifetime permits to submit revised financial responsibility demonstrations. EPA estimates that 10 percent of operators in DI programs will each take 2 hours to prepare and submit revised financial data.

Burden on Primacy Agencies Associated with Class II Wells

Class II primacy agencies review and respond to permit applications and permit reviews/modifications, and monitoring and testing data submitted by operators within their states. State burden associated with each activity involved in the oversight of Class II programs is presented in Column A of Table A-2.

EPA estimates that states will spend 23.5 hours per permit application reviewing Class II injection well applications. Primacy agency staff spend one hour to determine whether to reissue, modify, or revoke each permit during the five-year review process. Primacy agencies spend four hours reviewing each request for a permit modification or renewal.

State primacy agencies spend from ¼ to ½ hour per report reviewing monitoring and MIT data or occasional reports submitted by Class II operators (see details in Table A-2).

Burden Associated with Class III Wells

Table A-3 contains EPA's estimate of the annual paperwork burden on operators for permitting, monitoring and testing, reporting and recordkeeping, and closing their facilities, and state burden for administering Class III programs.

Class III Operators

Permitting/Start-up

A Class III operator will spend an average of 132 hours to prepare a new permit application form and the required attachments. Reading the directions and filling out the application form account for 11 hours of the total. Table A-3 provides estimates of the operator time, in addition to customary business practice, required to prepare each component of the permit application. EPA estimates that permit applicants will spend an average of:

- 32 hours to prepare AoR maps and studies;
- 22 hours to prepare maps and cross sections of USDWs within the AoR, and of local and regional geology;
- 16 hours to prepare monitoring plans;
- 14 hours to prepare proposed corrective action plans;
- 9 hours to prepare proposed operating data, formation testing and stimulation programs, and injection procedures;

Table A-3

Annual Paperwork Burden and Costs Associated with Class III Wells: Operators

						A	B	C	D	E	F
		Hours and Costs per Response									
Description of Requirement	**Frequency**	**Legal**	**Managerial**	**Technical**	**Clerical**	**Unit Burden**	**Unit Labor Cost**	**Unit Non-Labor Cost**	**No of Responses**	**Total Hours/Year**	**Total Cost/Year**
Initial/Start-up Requirements											
Requirements associated with permit applications (Per Permit Application)											
Read permit application directions.	One-time	0.0	0.0	0.5	0.5	1.0	$32	$0	32	32	$1,010
Gather and submit the following information: (1) a description of activities requiring a permit, (2) facility name and address, (3) SIC codes, (4) ownership and facility status, (5) facility location, (6) listing of relevant permits or construction appro	One-time	0.5	2.0	4.7	2.8	10.0	$430	$0	32	320	$13,771
For DI programs, gather and submit a list of all land owners within one quarter mile of the facility boundary.	One-time	0.2	0.0	0.0	1.0	1.2	$40	$168	27	32	$5,629
Prepare and submit plugging and abandonment plan.	One-time	0.0	0.0	6.4	1.6	8.0	$288	$0	32	256	$9,210
Show evidence of financial responsibility for closure.	One-time	0.0	0.5	1.0	2.0	3.5	$122	$0	32	112	$3,910
Prepare and submit proposed Corrective Action Plan.	One-time	0.0	2.0	10.0	2.0	14.0	$577	$0	32	448	$18,472
Prepare and submit revised Corrective Action Plan.	One-time	0.0	1.0	8.0	1.0	10.0	$405	$0	6	64	$2,595
Prepare and submit AoR map and study.	One-time	0.0	3.2	25.5	3.4	32.0	$1,295	$995	32	1,024	$73,288
Prepare and submit maps and cross-sections of USDWs within AoR, local geology, and regional geology.	One-time	0.0	0.0	18.0	4.0	22.0	$797	$200	32	704	$31,925
Prepare and submit proposed operating data, formation testing program, stimulation program, and injection procedure.	One-time	0.0	2.0	6.0	1.0	9.0	$397	$0	32	288	$12,716
Prepare and submit schematic of the well.	One-time	0.0	0.0	4.2	0.8	5.0	$183	$0	32	160	$5,851
Prepare and submit monitoring plan.	One-time	0.0	0.0	12.0	4.0	16.0	$564	$0	32	512	$18,042
Requirements associated with completion reports (Per Well)											
Prepare and submit completion form and supporting documentation (7520-9).	One-time	0.0	0.0	1.5	2.5	4.0	$119	$0	21	84	$2,495
Prepare and submit appropriate logs and tests during construction.	One-time	0.0	0.2	1.9	0.2	2.4	$97	$4,583	1	3	$6,012
Demonstrate mechanical integrity.	One-time	0.0	1.0	8.0	1.0	10.0	$405	$4,006	21	210	$92,637
Requirements associated with permit reviews/renewals/modifications (Per Permit/Per Facility)											
Respond to issues raised during permit review.	Every 5 years	0.0	3.0	1.0	0.0	4.0	$248	$0	33	132	$8,196
Prepare and submit request for permit modification.	Occasional	0.0	2.0	22.0	4.0	28.0	$1,093	$0	24	672	$26,225
Monitoring/Testing Requirements (Per Facility)											
Monitor the nature of injected fluids.	As necessary to obtain representative data	0.0	0.0	6.0	2.0	8.0	$282	$0	45	362	$12,764
Monitor injection pressure and flow rate or volume of injected fluids, or meter and record injected and produced fluid	Semi-monthly/ Continuous	0.0	0.0	3.3	1.3	4.6	$161	$0	4,290	19,884	$690,195
Demonstrate mechanical integrity.	Every 5 years	0.0	16.1	128.7	16.1	160.9	$6,522	$64,442	9	1,457	$642,591
Monitor the fluid level in the injection zone where appropriate and monitor parameters chosen to measure water quality in the monitoring wells.	Semi-monthly	0.0	0.0	27.5	3.0	30.5	$1,143	$0	262	7,982	$299,112

Table A-3

Annual Paperwork Burden and Costs Associated with Class III Wells: Operators

						A	B	C	D	E	F
		Hours and Costs per Response									
Description of Requirement	**Frequency**	**Legal**	**Managerial**	**Technical**	**Clerical**	**Unit Burden**	**Unit Labor Cost**	**Unit Non-Labor Cost**	**No of Responses**	**Total Hours/Year**	**Total Cost/Year**
Reporting Requirements (Per Facility)											
Notify Director of (1) planned physical changes to the facility, (2) anticipated noncompliance, (3) permit transfers, (4) progress in meeting compliance schedule in permit, (5) possible endangerment to a USDW.	Occasional	0.0	1.0	3.0	2.0	6.0	$235	$0	17	99	$3,877
Report to the Director on required monitoring, mechanical integrity tests, and other required tests.	Quarterly	0.0	1.0	10.0	19.0	30.0	$918	$0	660	19,800	$606,127
Recordkeeping Requirements (Per Facility)											
Retain records of permitting data, calibration and maintenance data, and monitoring results.	At least 3 years	0.0	0.0	0.4	3.0	3.4	$88	$0	165	561	$14,535
Closure Requirements (Per Facility)											
Notify the Director before conversion or abandonment of the well or in the case of area permits before closure of the project.	One-time	0.0	1.0	0.5	0.5	2.0	$101	$0	2	4	$203
In DI programs, submit a plugging and abandonment report within 60 days after plugging a well or at the time of the next quarterly report.	One-time	0.0	0.0	0.8	0.3	1.0	$35	$0	1	1	$40
Other Requirements (Per Facility)											
In DI programs, submit revised demonstration of financial responsibility.	Occasional	0.0	0.5	0.5	1.0	2.0	$79	$0	92	184	$7,220
TOTALS									**5,996**	**55,387**	**2,608,646**

Note: Numbers may not add due to rounding.

Table A-3 (continued)

Annual Paperwork Burden and Costs Associated with Class III Wells: States

		A	B	C	D	E	F
		Hours and Costs per Response			Total Hours and Cost		
Program Oversight Activities	**Frequency**	**Unit Burden**	**Unit Labor Cost**	**Unit Non-Labor Cost**	**Number of Responses**	**Total Hours/Year**	**Total Cost/Year**
Initial/Start-up							
Permit applications (Per Permit Application)							
Consider the permit application, area of review, relevant maps and cross sections, fluid injection rate and volume, proposed contingency plans, monitoring plans, and	One-time	20.0	$761	$0	13	260	$9,892
Consider the permit application, area of review, relevant maps and cross sections, fluid injection rate and volume, proposed contingency plans, monitoring plans, and	One-time	40.0	$1,522	$0	18	720	$27,395
Provide public notice of issuance of a draft permit or intent to deny.	One-time	2.0	$76	$0	48	96	$3,653
Consider public comments.	One-time	8.0	$304	$0	48	384	$14,610
Issue final permit decision.	One-time	10.0	$380	$0	48	480	$18,263
Respond to comments.	One-time	15.0	$571	$0	48	720	$27,395
Review completion report.	One-time	2.0	$76	$0	21	42	$1,598

Table A-3 (continued)

Annual Paperwork Burden and Costs Associated with Class III Wells: States

		A	B	C	D	E	F
		Hours and Costs per Response			Total Hours and Cost		
Program Oversight Activities	**Frequency**	**Unit Burden**	**Unit Labor Cost**	**Unit Non-Labor Cost**	**Number of Responses**	**Total Hours/Year**	**Total Cost/Year**
Permit reviews/modifications (Per Facility)							
Review each permit to determine whether it should be modified, revoked and reissued, or terminated.	Every 5 years	4.0	$152	$0	14	56	$2,137
Review request for permit modification or re-issuance.	Occasional	20.0	$761	$0	23	460	$17,502
Monitoring/Testing (Per Facility)							
Review mechanical integrity test data submitted by operators.	Every 5 years	0.5	$19	$0	14	7	$267
Review monitoring data submitted by operators.	Quarterly	0.25	$10	$0	281	70	$2,671
Other Reporting (Per Facility)							
Respond to periodic notifications by owners and operators.	Occasional	4.0	$152	$0	18	72	$2,739
Recordkeeping (Per Facility)							
Maintain administrative record (DI).	One-time	4.0	$152	$0	0	0	$0
Closure (Per Facility)							
Review plugging and abandonment report (DI only).	One-time	4.0	$152	$0	0	0	$0
TOTAL					**594**	**3,367**	**$ 128,122**

Note: Numbers may not add due to rounding.

- 8 hours to prepare plugging and abandonment plans;
- 5 hours to prepare schematics of the wells; and
- 3.5 hours to demonstrate financial responsibility.

In addition, EPA estimates that, when requested by the Director, revised corrective action plans will take 10 hours each. Two applicants in DI programs will spend 1.2 hours each to gather a list of landowners adjacent to the facility.

Operators completing wells must perform a two-part MIT and submit a completion form. The burden associated with preparing completion reports is difficult to determine. Operators of Class III facilities, especially uranium mining facilities, typically develop their projects in multiple phases under the same area permit. Based on conversations with operators and states, EPA estimates that operators of Class III wells will spend an average of 4 hours to prepare a completion report, 10 hours to demonstrate mechanical integrity, and 2.4 hours to perform and submit the results of required logs and tests during construction.

Permit Renewals, Reviews, and Modifications

EPA estimates that 20 percent of operators each year will have a formal or informal review of their permits. Each operator will take 4 hours to respond to any issues raised during the review. In addition, Class III operators will take an average of 28 hours to prepare requests for permit modifications.

Monitoring/Testing

EPA anticipates that operators of salt solution mining facilities will submit annual analyses of their injectate. On average, each operator will take 8 hours per year to sample and analyze their injectate in-house.

Operators of Class III facilities will monitor injection pressure, flow rate, or volume of injected fluids semi-monthly, or meter injected and produced fluid volumes continuously. EPA expects that operators perform this activity periodically as a customary business practice to ensure the efficient operation of their facilities, and that the incremental collection burden is approximately 4.6 hours per operator over a two-week period. This represents the time needed to fill out field reports.

EPA estimates that operators of salt solution mining facilities will perform two-part MITs on all of their wells each year.[3] The burden is estimated to be 161 hours per operator.

[3] Some operators may be allowed to submit cementing records in lieu of performing temperature or noise logs.

All uranium operators monitor water quality at selected monitoring wells completed in the injection zone and overlying freshwater aquifers. Approximately 3 active facilities monitor semi-monthly; approximately 7 facilities which are performing aquifer restoration monitor monthly. EPA estimates that the typical uranium facility has about 110 monitoring wells. As with pressure, flow, and volume monitoring, operators will perform about two-thirds of this monitoring as a customary business practice to identify potential excursions from the injection zone. EPA assumes that UIC requirements increase the monitoring burden to these operators by about 30.5 hours per monitoring period.

Reporting and Recordkeeping

Operators of Class III facilities will incur a burden of 30 hours per facility per quarter for quarterly reporting on monitoring and any MITs performed. Finally, about 10 percent of operators will spend 6 hours per year on occasional reporting activities. EPA estimates that each Class III operator spends approximately 3.4 hours on recordkeeping annually.

Closure

EPA estimates that Class III operators who close their projects will take 2 hours to prepare written notifications to the Director. Operators in DI programs will spend one hour to submit a plugging and abandonment report.

Burden on Primacy Agencies Associated with Class III Wells

For the Class III Program, primacy agency staff review and respond to permit applications, permit reviews/modifications, and monitoring and testing data submitted by operators. State burden associated with each activity involved in the oversight of Class III programs is presented in Column A of Table A-3.

Depending on whether the permit is issued or denied, EPA estimates that states will spend between 20 and 77 hours reviewing each application for a permit to inject waste into a Class III well. Primacy agency staff spend 4 hours determining whether to reissue, modify, or revoke each permit during the five-year review process, and 20 hours reviewing each request for a permit modification or re-issuance. Class III primacy agencies spend from ¼ to ½ hour per report reviewing monitoring and MIT data or occasional reports submitted by operators (see details in Table A-3).

Burden Associated with Class IV and Endangering Class V Wells

Paperwork burden on operators of Class IV/endangering Class V wells and on states for administering these wells is presented Table A-4.

Class IV and Endangering Class V Well Operators

Class IV wells and Class V wells that are found to be endangering USDWs are banned from injection, and owners of these wells are required to close them and submit plugging and abandonment reports to states or DI programs. The exception to the ban is for those Class IV wells used to inject contaminated ground water that has been treated and re-injected into the same formation from which it was drawn. These wells are authorized by rule for the life of the well if such subsurface emplacement of fluid is approved by EPA or a State pursuant to the provisions for the cleanup of releases under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 or RCRA. EPA estimates that the burden associated with this one-time requirement will be 10 hours per well (See Table A-4). Because these wells are banned, there are no permitting or monitoring requirements.

Burden on Primacy Agencies Associated with Class IV and Endangering Class V Wells

State burden associated with Class IV and endangering Class V wells involves review by primacy agency staff of closure plans submitted by operators. EPA estimates the state burden to be one hour per review.

Burden Associated with Class V Wells

EPA's estimate of the annual paperwork burden on operators and states associated with Class V wells is presented in Column A of Table A-5.

Class V Operators

Activities for Class V well operators include submitting inventory information and compliance with the Class V Rule by owners of motor vehicle waste disposal wells (MVWDWs) and large-capacity cesspools.

Inventory Activities

Recent efforts by the Regions and state primacy agencies to address the potential threats to USDWs posed by Class V wells will likely increase compliance with the inventory requirement. Each Class V well operator will take 0.5 hours to prepare and submit inventory information to the appropriate Regional or state primacy agency.

Annual Paperwork Burden and Costs Associated with Class IV/Endangering Class V Wells: Operators

							A	B	C	D	E	F
										Total Hours and Costs		
Description of Requirement	**Questions**	**Frequency**	**Managerial**	**Technical**	**Clerical**	**Unit Burden**	**Unit Labor Cost**	**Unit Non-labor Cost**		**No. of Responses**	**Total Hours/Year**	**Total Cost/Year**
Closure Requirements (Per Well)												
Submit a plugging and abandonment report within 60 days after plugging a well		One-time	0	7.5	2.5	10.0	$216	$0		990	9,900	$213,662
TOTAL										**990**	**9,900**	**$213,662**

Note:

Numbers may not add due to rounding.

Table A-4 (continued)

Annual Burden and Costs Associated with Class IV/Endangering Class V Wells: States

		Hours and Costs per Response			Total Hours and Cost		
Description of Requirement	**Frequency**	**Unit Burden (A)**	**Unit Labor Cost**	**Unit Nonlabor Cost**	**Number of Responses**	**Total Hours/Year**	**Total Cost/Year**
Closure							
Review closure plan.	One-time	1.0	$38	$0	758	758	$28,840
TOTAL					**758**	**758**	**$28,840**

Note:
Numbers may not add due to rounding.

Table A-5

Annual Paperwork Burden and Costs Associated with Class V Wells: Operators

						A	B	C	D	E	F
		Hours and Costs per Response									
Description of Requirement	**Frequency**	**Legal**	**Managerial**	**Technical**	**Clerical**	**Unit Burden**	**Unit Labor Cost**	**Unit Non-labor Cost (A)**	**No. of Responses**	**Total Hours/Year**	**Total Cost/Year**
Inventory Requirements											
In DI programs, submit inventory information prior to commencing injection.	One-time	0.0	0.0	0.0	0.5	0.5	$9	$0	15,000	7,500	$128,700
Class V Rule Requirements for Owners/Operators of Large-Capacity Cesspools											
Read regulations.	One-time	0.0	0.0	3.0	0.0	3.0	$69	$0	333	1,000	$23,056
Prepare and submit pre-closure notification (Form 7520-17).	One-time	0.0	0.5	0.8	0.3	1.5	$48	$0	333	500	$16,109
Class V Rule - Startup Requirements for Owners / Operators of Motor Vehicle Waste Disposal Wells											
Contact state or local agency to determine requirements.	One-time	0.0	0.0	1.0	0.0	1.0	$23	$0	498	498	$11,474
Read regulations.	One-time	0.0	0.0	3.0	0.0	3.0	$69	$0	498	1,493	$34,423
For wells that will close, sample injectate and maintain record.	One-time	0.0	0.0	1.0	0.5	1.5	$32	$617	137	206	$88,851
Prepare and submit pre-closure notification (Form 7520-17).	One-time	0.0	0.5	0.8	0.3	1.5	$48	$0	137	206	$6,621
For wells obtaining a waiver, conduct initial sampling.	One-time	0.0	0.0	1.0	0.5	1.5	$32	$617	361	541	$233,908
For wells obtaining a waiver, prepare and submit permit application.	One-time	0.0	8.0	25.0	21.0	54.0	$1,365	$0	361	19,476	$492,189
Class V Rule - Ongoing Activities for Owners / Operators of Motor Vehicle Waste Disposal Wells											
Conduct quarterly injectate sampling.	Quarterly	0.0	0.0	1.0	0.5	1.5	$32	$617	21,744	32,616	$14,101,954
Conduct annual sludge sampling (concurrent with injectate sampling).	Annual	0.0	0.0	1.0	0.5	1.5	$32	$1,613	5,436	8,154	$8,940,472
Annual reporting and recordkeeping of all monitoring results.	Annual	0.0	0.0	3.0	1.0	4.0	$86	$0	5,436	21,744	$469,279
TOTAL									**50,273**	**93,933**	**$24,547,035**

Notes:
(A) EPA assumes that there are no start-up costs; all non-labor costs are O & M costs.

Numbers may not add due to rounding.

Table A-5 (continued)
Annual Paperwork Burden and Costs Associated with Class V Wells: States

		A	B	C	D	E	F
		Hours and Costs per Response			Total Hours and Cost		
Description of Requirement	**Frequency**	**Unit Burden (A)**	**Unit Labor Cost**	**Unit Nonlabor Cost**	**Number of Responses**	**Total Hours/Year**	**Total Cost/Year**
Initial/Startup							
Review inventory information.	One-time	0.5	$19	$0	9,696	4,848	$184,456
Primacy State Activities Associated With the Class V Rule							
Provide technical assistance to owners/operators (at start-up).	One-time	1.0	$38	$0	1,611	1,611	$61,313
Review and file pre-closure notifications.	One-time	1.3	$48	$0	912	1,140	$43,378
Review, approve, and file waivers/permit applications.	One-time	8.3	$316	$0	699	5,805	$220,870
Review and file annual monitoring reports.	Annual	0.8	$30	$0	3,514	2,811	$106,955
TOTAL					**16,433**	**16,216**	**$ 616,973**

Notes:
(A) Unit burdens for initial/start-up activities reported on a per-permit basis. Unit burden for other activities reported on a per-operator basis.
Numbers may not add due to rounding.

Activities Required Under the Class V Rule

Under the Class V Rule, facilities that wish to continue operating motor vehicle waste disposal wells must seek waivers from the ban on existing motor vehicle waste disposal wells and apply for permits. As a condition of the permit, facilities must submit all monitoring reports to the UIC Director. Owners of MVWDWs and large-capacity cesspools that close are required to submit pre-closure notifications.

Note: While the Class V Rule required that all closure or permitting activities be completed by January 2007 (the latest date by which operators with state-granted extensions would be required to have closed or applied for a permit), EPA assumes that some of these activities may not be complete. Thus, some permitting/closure burden is included in this ICR.

Operators of Large-Capacity Cesspools

Operators of facilities with large-capacity cesspools will need to become familiar with the Class V requirements and prepare and submit a pre-closure notification to their primacy agency. EPA assumes that each facility will require a total of 4.5 hours to complete these activities.

Operators of Motor Vehicle Waste Disposal Wells

All owner/operators of facilities with MVWDWs must contact their primacy agency to determine if their wells are located in a source water protection area (SWPA) or other sensitive ground water area. These activities will require 4 hours. If a well is located within one of these areas, the owner/operator will either close the well or seek a waiver and apply for a permit.

- If they choose to close their wells, owners of MVWDWs must notify the UIC Program Director at least 30 days prior to well closure, sample their injectate, and submit a pre-closure notification form (Form 7520-17 or a state equivalent). These operators would incur a burden of 3 hours.

- The specific information required in a permit application will be defined by the appropriate Primacy States or EPA regions. For purposes of this analysis, EPA has assumed that the permit requirements will be similar to those required in existing UIC permit applications (40 CFR 144.31) including: a description of activities requiring a permit, inventory information, topographic maps, and a brief description of the business. These operators will also sample their injectate. The burden for these activities is estimated to be 55.5 hours, the majority of which is to prepare the permit application.

Owner/operators of MVWDWs that opted to seek a waiver and apply for a permit (and were granted one) will be required to sample their injectate quarterly and sludge

annually and submit these results once per year. These operators will incur an annual burden of 7 hours.

Burden on Primacy Agencies Associated with Class V Wells

State primacy agencies' burden associated with Class V wells includes reviewing inventory information, processing permit applications and pre-closure notifications, and reviewing and responding to monitoring data submitted by operators within their states. State burden associated with oversight of Class V programs is presented in Column A of Table A-5.

EPA estimates that states will spend 0.5 hours per Class V facility reviewing inventory information. EPA estimates that states will review permit applications and pre-closure notifications submitted by operators of facilities with motor vehicle waste disposal wells and large-capacity cesspools. State primacy agencies will also review annual monitoring reports submitted by operators (details are presented in Table A-5).

States as Respondents

State burden associated with program oversight and compiling and reporting data using the 7520 forms and the UIC measures reporting process is presented in Column A of Table A-6. The burden on states associated with completing the 7520 forms ranges from 2 to 280 hours per form. States will also report quarterly to EPA on the UIC program measures via a new online reporting system. EPA estimates the annual burden associated with this effort will be 120 hours per state primacy agency, or 60 hours semi-annually.

The bulk of the states' burden associated with operator reporting will be for compiling data on an estimated 15,000 newly inventoried facilities on the Inventory of Injection Wells form (7520-16). Most of these are new facilities added to the Class V inventory each year.

EPA estimates that the annual recordkeeping burden on state primacy agencies associated with the 7520 forms and the inventory form will be 40 hours per agency. EPA estimates that maintenance of inventory data will account for the bulk of the recordkeeping burden.

EPA estimates that, in each primacy program, one-half of an FTE (1,040 hours) is devoted to implementing their state UIC Program. Implementation activities states may perform include updating state regulations as needed to reflect new federal rules or providing guidance, training, or other information to well operators.

Table A-6
Annual State Burden and Cost for Program Oversight and Reporting

		A	B	C	D	E	F
		Hours and Costs per Response			Total Hours and Cost		
Description of Requirement	**Frequency**	**Unit Burden**	**Unit Labor Cost**	**Unit Nonlabor Cost**	**Number of Responses**	**Total Hours/Year**	**Total Cost/Year**
Program Oversight							
Oversee and implement UIC program in the State, for example, update regulations or guidances as needed.	Ongoing	1,040	$39,570	$0	56	58,240	$2,215,916
7520 Forms Reporting							
Permit Review and Issuance Form (7520-1)	Annual	4.5	$171	$0	56	252	$9,588
Compliance Evaluation Form (7520-2A)	Semi-annual	6.0	$228	$0	112	672	$25,568
Compliance Evaluation for Significant Non-Compliance Form (7520-2B)	Semi-annual	5.5	$209	$0	112	616	$23,438
Mechanical Integrity Tests/Remedial Action Form (7520-3)	Annual	5.0	$190	$0	56	280	$10,653
Quarterly Exceptions List Form (7520-4)	Quarterly	2.0	$76	$0	224	448	$17,046
Inventory of Injection Wells Form (7520-16)	Annual	280	$10,642	$0	56	15,664	$595,978
Measures Reporting							
Report on UIC Measures to Headquarters	Semi-annual	60	$2,283	$0	112	6,720	$255,683
Activities related to populating the National UIC Database							
Start-up activities (per program)							
Develop data to meet UIC database needs (programs with UIC databases)	One-time	10	$393	$ 3,304	36	372	$133,071
Build data flow through data node (programs with UIC databases)	One-time	25	$951	$ 9,166	36	900	$364,235
Build data flow through data node (programs without databases)	One-time	8	$317	$ 3,833	0	0	$0
Ongoing activities (per program)							
Enter UIC data into state database	Ongoing	200	$7,610	$0	0	0	$0
Data flow and QA checks	Quarterly	24	$913	$0	96	2,304	$87,663
Recordkeeping							
Maintain records of 7520 forms	Ongoing	40	$1,522	$0	56	2,240	$85,228
					1,008	**88,708**	**$3,824,066**

Notes:

For program oversight and forms and measures reporting, the number of respondents reflects the number of primacy agencies.

There may be more than one agency per state with Primacy authority.

EPA assumes that states with high and medium data coverage will initiate data flow to the UIC database during the clearance period. See Appendix B.

Numbers may not add due to rounding.

State Activities Associated with the National UIC Database

EPA Headquarters plans to deploy the national UIC database in 2007. Once they initiate a data transfer process, States will be able to automatically transfer the data needed to generate the information they currently report via the 7520 forms and the measures data to Headquarters. (Once they set up this data transfer process, States will no longer be required to complete the 7520 forms, report on the UIC measures, or retain records. Appendix B describes the data transfer activities in detail, EPA's burden and cost estimates, and the eventual burden and cost savings to states associated with the national UIC database.)

To initiate the data transfer, states will need to develop data to transfer to the national database and set up the automated data flow. These burdens will vary depending on the status of a state's existing UIC database. On average, EPA estimates that each program will require 310 hours to develop the data and 750 hours to set up the data flow. Annualized over the planned six-year database development schedule, this equates to 52 hours per program to develop the data and 125 hours to set up the data flow. EPA assumes that most of this work (80 percent) will be performed by contractors.

Once the data transfer process is in place, states will place their data on a data node quarterly, notify Headquarters that the data are available, and respond to QA and data validation issues as needed. EPA estimates these tasks will require 24 hours, and be incurred 4 times per year (96 hours total).

A.2 Estimating the Respondent Universe

In this section, EPA describes the number of respondents subject to each paperwork activity in this ICR. The number of responses for each activity is shown in Column D of Tables A-1 through A-6. This number, known as the respondent universe, is based on EPA's assumptions on the number of permittees subject to each paperwork requirement, e.g., the number of permit applications or well closures expected, or the percent of permittees subject to monitoring or reporting requirements and the frequency with which they must comply with those requirements. The frequency at which each activity is performed is presented in the burden and cost tables along with EPA's description of each activity. Specific assumptions about the respondent universe for each well class are described below.

Class I

EPA inventory data indicate that there are 549 Class I wells, of which 119 inject hazardous waste, and 430 inject nonhazardous waste.

Class I Hazardous

According to EPA's inventory, there are 119 Class I hazardous waste wells, with an average of 1.9 wells at each facility. EPA estimates that 8 new Class I hazardous

waste facility operating permits will be issued each year (6 for one new well at an existing facility, and the remaining two for newly constructed facilities). EPA further anticipates that 12 Class I hazardous facility operators will renew their permits each year; 5 will modify their permits each year; and 6 operators will modify their petitions each year. All operators of Class I hazardous waste facilities must monitor and report at various frequencies (see Table A-1A). EPA expects that one Class I hazardous well will close during each year of the life of this ICR.

Class I Nonhazardous

EPA estimates that there are 430 Class I nonhazardous waste wells at 226 facilities, an average of 1.9 wells per facility. The Agency estimates that 14 new nonhazardous waste injection permits will be issued each year, of which 10 will be for one new well at an existing facility. EPA anticipates that 20 Class I nonhazardous facility operators will renew their permits each year, and 9 Class I nonhazardous facility operators will modify their permits each year. EPA also estimates that operators of 16 municipal wastewater disposal facilities in South Florida will submit permit applications to meet the requirements of the Class I Florida rule. Every operator of a Class I nonhazardous waste facility must monitor and report at various frequencies, as shown in Table A-1B. Based on past data, EPA anticipates that one Class I nonhazardous well in a primacy state will close each year.

Class II

The 2006 UIC inventory includes 143,951 Class II wells. EPA assumes that the typical Class II facility has approximately 10 wells, thus there are approximately 14,400 Class II facilities.

EPA anticipates that, collectively, EPA regional offices and primacy states will receive approximately 1,411 applications for Class II wells each year during the life of this ICR. Details of the numbers of Class II operators subject to each paperwork requirement are presented in Column D of Table A-2.

Based on previous studies of state AoR practices and requirements, EPA projects that state primacy agencies and EPA Regions will determine that a complete AoR is not necessary for approximately 831 of the 1,411 permit applicants. Of the remaining applicants, EPA projects that approximately 266 applicants will submit an AoR map and an AoR study as part of the permit application. Another 314 applicants will submit an AoR map and a listing of the wells in the AoR, and the state primacy agency will perform most or all of the tasks involved in the AoR study.

EPA estimates that 141 applicants will submit corrective action plans to address specific problems identified by the AoR study. EPA regional or state primacy staff will require 28 operators (20 percent) to revise their corrective action plans.

Prior to obtaining approval to begin injection, operators must demonstrate mechanical integrity and submit completion reports for an estimated 1,830 new Class II wells each year. Most operators will submit logs for offset wells in their projects. EPA assumes that operators will perform additional logs and tests for 275 new II-D and II-R wells.

EPA estimates that approximately 71,975 Class II wells (50 percent of the inventory) are permitted, and that the 1,440 operators of 14,395 wells (20 percent) will undergo permit reviews each year. In addition, EPA expects that 3,599 operators will submit requests for permit modifications.

From time to time, operators submit reports or notify UIC staff of various events such as planned changes to the injection facility, permit transfers, progress in achieving compliance milestones, and noncompliance or malfunctions which may endanger a USDW. EPA estimates that approximately 864 operators submit one of these occasional reports each year.

EPA projects that approximately three operators of rule-authorized wells in DI states may be required to gather and submit groundwater monitoring data, analyses of injected fluids, a description of geologic strata, and other items as requested.

EPA projects that, each year, approximately 1,044 operators will plug and abandon all of their wells. In addition, EPA assumes that approximately 1 operator in a DI program will elect to plug its wells in a manner different from the one specified in its plugging and abandonment plan.

Class III

EPA estimates that there are approximately 165 facilities with Class III wells (10 uranium mining, 45 salt solution mining, and 110 brine mining/other sites). A typical uranium facility has approximately 1,581 Class III wells, a typical salt mining facility has 11 wells, and a typical brine mining/other facility has 3 wells.

EPA regional offices and state primacy agencies expect to receive 32 permit applications from Class III operators each year. EPA estimates that approximately 2 Class III operators will close their projects annually.

Operators of all 165 Class III facilities will monitor injection pressure, flow rate, or volume of injected fluids semi-monthly, or meter injected and produced fluid volumes continuously. EPA anticipates that operators of salt solution mining facilities will submit analyses of their injectate once each year, and operators of salt solution mining facilities will perform two-part MITs on all of their wells every five years. All uranium well operators monitor water quality in the injection zone and overlying freshwater aquifers either semi-monthly or monthly.

Class IV/Endangering Class V

Based on UIC measures data reported by the states in 2003, EPA anticipates that 990 Class IV wells and endangering Class V wells will close each year. EPA estimates 23 percent of Class IV and endangering Class V wells are in DI states.

Class V

The current EPA inventory of Class V wells includes approximately 402,000 wells. This number is imprecise, and it is estimated that perhaps 3 to 5 times as many Class V wells actually exist. EPA anticipates that approximately 15,000 operators of Class V facilities will submit inventory information each year over the life of this ICR, based on trends in the UIC program inventory.

Facilities Subject to the Class V Rule

The Class V rule required that all large capacity cesspools be closed and that all motor vehicle waste disposal wells (MVWDWs) either close or obtain a permit by 2007 (the burden associated with these activities was estimated in the 2004 UIC Program ICR). However, based on consultations with regional and state staff, there is reason to believe that these activities are incomplete. Thus, this ICR assumes that some permitting and closure activities associated with Class V Rule requirements will continue into this clearance period.

EPA estimates that 1,000 large-capacity cesspools (an average of 333 per year) will close during the clearance period. In addition, EPA estimates that operators of 411 MVWDWs (137/year) will close and 1,082 MVWDW operators (361/year) will apply for a permit during the clearance period.

In addition, operators of 5,436 MVWDWs that have opted to obtain a permit will conduct quarterly injectate sampling and annual sludge sampling, as required under the Class V rule.

States as Respondents

EPA assumes that 56 primacy agencies in 40 states will prepare and submit 7520 forms and report on the UIC measures. This number reflects the fact that, in some states, more than one agency oversees UIC activities (e.g., states typically regulate Class II wells through agencies other than those overseeing other classes of wells for which they have primacy). The frequency at which Primacy agencies complete each 7520 form is presented in Table A-6. Measures reporting will take place semi-annually (mid-year and end of year).

Because of the effort involved in initiating data transfer to the national UIC database, EPA assumes that states will accomplish this at varying paces, resulting in a phased-in schedule for populating the national UIC database. EPA assumes that about 36

state programs will begin to flow data during the three year clearance period covered by this ICR. These same 36 programs will begin to do quarterly data flow and QA checks; EPA assumes that on average, 12 programs will begin data transfer each year, an average of 24 programs per year over the three-year clearance period. (EPA assumes that, in the initial years, the "early deployers" will continue to complete 7520 forms and report measures data, while testing of the database continues.) See Appendix B for additional detail about the schedule and EPA's assumptions.

Appendix B: The National UIC Database

EPA Headquarters is developing the National UIC Database, a well-specific database that will collect and store state and DI program data to support UIC Programmatic data needs. The national UIC data model contains approximately 120 data elements related to various aspects of the UIC Program (e.g., permit information and enforcement and compliance data). The database will include a mechanism to electronically transfer data between existing state databases and Headquarters' database.

Headquarters plans to deploy the national UIC database in mid-2007. Over the next several years, states will map their data to the national database and begin to transfer data. EPA assumes that data transfer activities would be "phased in" over about six years; this schedule would allow states with existing and well-developed databases to complete the data transfer early on (and begin to build up content in the national database), while giving additional time to states with less electronically available data to accomplish the data transfer.

Once they initiate a data transfer process, States would no longer be required to complete the 7520 forms and do measures reporting, eventually eliminating the current burden associated with gathering and compiling data, completing the reporting forms, and maintaining records.

This Appendix describes the current status of UIC data management by primacy states, the burden and cost associated with data transfer, and the eventual cost savings to states associated with the national UIC database.

B1. Status of State Data Management Activities

As a prelude to the national database development effort, EPA Headquarters conducted a cataloging effort to assess the current status of data management by 63 state UIC programs (some states have more than one UIC program). EPA's findings are presented in the *UIC Program Databases Cataloging Report* (December 2, 2005).

Data coverage is a measure of how closely the data elements in a state's database match those in the national data model. EPA assessed data coverage by determining how many of the national data elements reside in each state's database. Arbitrary cutoffs of 66 percent, 34-66 percent, and 33 percent and below are used to distinguish high, medium, and low data coverage, respectively. The effort required to map state data to the national database is assumed to be related to this coverage level.

Based on the cataloging effort, 36 state programs have high (7 programs) or medium data coverage (29 programs). Seven programs have low data coverage, and two programs have no electronic database. Eighteen (18) programs did not respond to the request for information; EPA conservatively assumes these programs do not have UIC databases. See Table B-1.

Table B-1: Summary of State UIC Data Coverage	
Data Coverage Level	Programs
High coverage	7
Medium coverage	29
Low coverage	7
No database	2
Unknown (assume no database)	18

B2. Burden and Cost Associated With Data Transfer

State UIC programs will incur burden and cost associated with the necessary start-up activities to prepare their databases and data for transfer to Headquarters and ongoing activities associated with quarterly data transfers to Headquarters. (Note: the cost estimates in this appendix are preliminary. At present, the first states are beginning to set up their data transfer; it is possible that the cost estimates may be revised in future ICRs.)

Burden associated with start-up activities

Prior to initiating data transfer, states will need to prepare their databases to flow data to the national database and initially populate the database. The effort (and associated cost) will vary depending on the current status of the state's database. That is, states with existing databases that currently contain most or all of the Headquarters data elements would need to do less work than states with fewer data elements in their database and states with no UIC database.

States with existing UIC databases (high or medium data coverage)

Start-up costs include the costs associated with developing the data to transfer to the national database and setting up the data flow process. The following activities are included:

> *Data Development:* these activities include adding new data fields and new data tables (if needed) to align the state's UIC data to the national data model. The effort involved is estimated to range from 150 to 300 hours per program, depending on current coverage.
>
> *Input Historic Data:* in addition, EPA assumes some programs have at least partial data in hard copy only and would need to input some data from paper files. EPA estimates that seven programs will require 200 hours to do this.

On average, the total "data development" cost to these programs is about 310 hours (11,150 hours divided by 36 programs). See Table B-2. Annualizing the effort over the estimated 6-year phase-in schedule, this equals 51.6 hours, per program, annually.

Table B-2: Data Development Burden			
	Hours/ program	Programs	Total
Data development – states with high coverage	150	7	1,050
Data development – states with medium coverage	300	29	8,700
Input historic data	200	7*	1,400
Total burden – all programs			11,150
Average (36 programs)			310

* These 7 programs are a subset of the 36 above.

Setting up Data Flow includes the following activities:

- Data mapping and data set generation includes mapping data from the state database to Headquarters and generating data sets with valid records. This is estimated to take 200 hours per program.
- Convert to Extensible Markup Language (XML), including developing a tool for automatic data conversion to XML. This will require an estimated 150 hours per program.
- Data flow via a Network Node involves setting up/testing automatic data submission and transfer to EPA's Central Data Exchange (CDX). This is estimated to require 400 hours per program.

The total data flow burden is estimated to be 750 hours per program. Annualized over 6 years, this equates to 125 hours per year per program.

States without databases (or low data coverage)

Headquarters plans to develop an Access database for use by states with no existing UIC database, or those that do not currently maintain most of the national data elements. EPA assumes that the 27 states with low or no data coverage would use this Headquarters-developed database. Because the database would be designed to the needs of the national UIC database and Headquarters would perform the basic programming, this effort is assumed to be less intensive, and is estimated to be one-third of the burden for those states that already have a database, as described above. EPA estimates the start-up burden to these state programs is 250 hours/ program (or 20.8 hours per year, annualized over 6 years).

Cost associated with start-up activities

Start-up non-labor costs for this ICR include contractor support and one-time hardware costs to set up a state "data node." EPA assumes that most start-up activities (estimated at 80 percent of the burden cited above), will be performed by contractors at an estimated labor rate of $80 hour. In addition, programs will incur $7,000/program ($1,167/year, annualized over 6 years) for hardware costs associated with setting up a data flow via the network node.

Ongoing activities

Annual activities include the incremental data entry burden for those states that currently do not enter UIC data into a state database. (States that already have a database are already incurring a data entry burden; thus, this ICR assume no additional paperwork burden for these states as a result of the new database.) The annual data entry burden is estimated to be 200 hours.

All programs will place their data on the node quarterly, notify Headquarters the data are available, and respond to quality assurance (QA) and data validation issues. EPA estimates these tasks will require 24 hours per quarter, or 96 hours per year.

B3. Burden Reduction and Cost Savings

Over the long run, the national UIC database will reduce the states' reporting burden. Once the data transfer process is initiated, States will no longer need to complete the 7520 forms and report on the measures. This will eventually eliminate the current burden associated with gathering and compiling UIC data, completing the reporting forms, and maintaining records.

As described above, states will need to make a time and hardware investment to develop the automated data transfer process. However, when the data transfer is complete, the current annual burden associated with completing the 7520 forms and reporting on the PAMs will be replaced with a lower burden associated with placing data on a network node to transfer it to Headquarters and providing QA to assure data accuracy, as described below:

- Under the current, paper-based system, states collectively incur $1.02 million annually in reporting and recordkeeping costs; this equals about $18,271 per state.

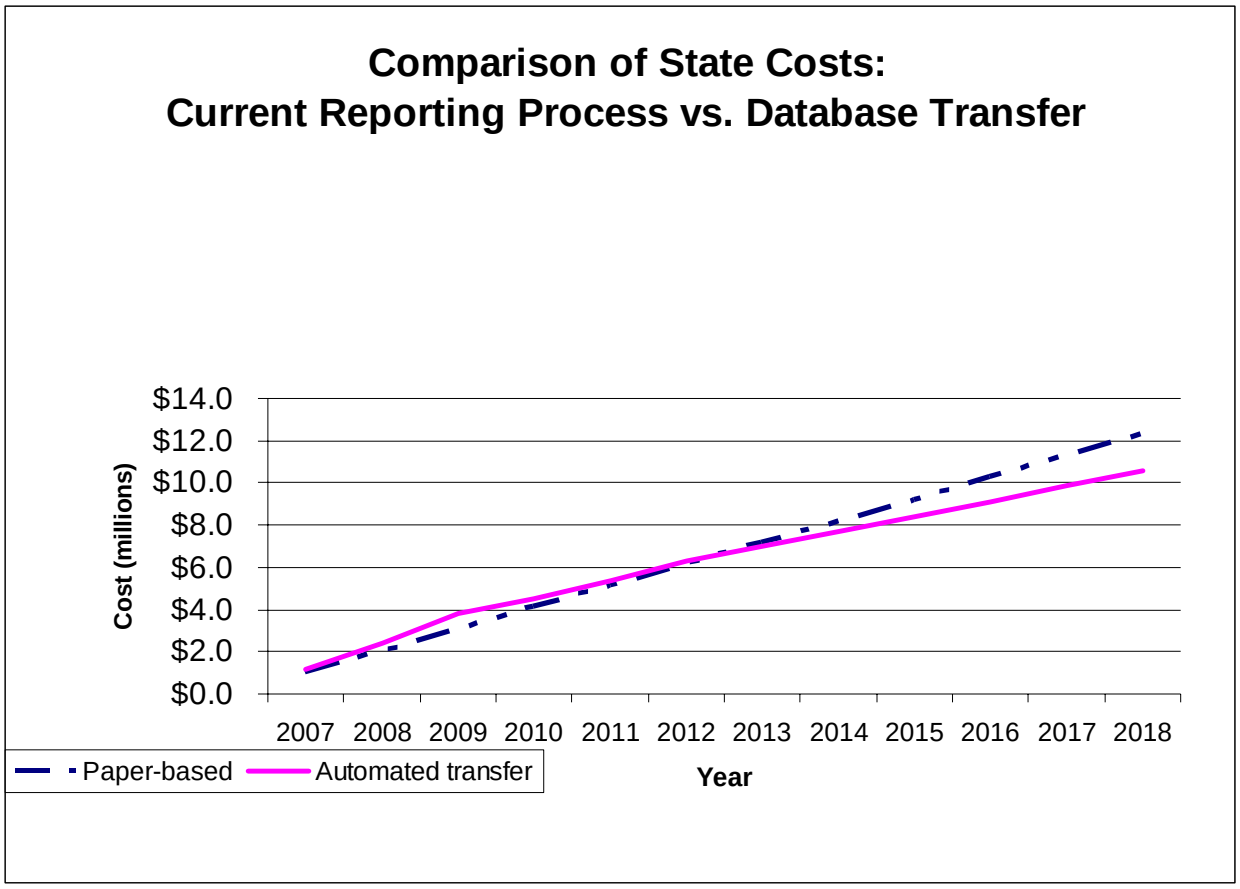
- Over the next three years (2007-2009), each state that currently has a database will incur $82,884 in start-up costs (as described above), and in the three years following that (2010-2012), each state without a database will incur $24,902 in start-up costs.

- When their initial data transfer is complete, each state will incur lower annual costs: an estimated cost of about $11,000 to enter data and transfer it to Headquarters quarterly.

Table B-3 presents the annual and cumulative costs to states under the current reporting system and using the national database.

Table B-3: Comparison of Costs – Current Reporting Process vs. Automatic Data Transfer				
	Paper-Based Reporting		**Data Transfer**	
Year	Annual cost	Cumulative cost	Annual cost	Cumulative cost
2007	$1,023,181	$1,023,181	$1,129,760	$1,129,760
2008	$1,023,181	$2,046,362	$1,264,906	$2,394,666
2009	$1,023,181	$3,069,543	$1,400,053	$3,794,719
2010	$1,023,181	$4,092,724	$730,917	$4,525,636
2011	$1,023,181	$5,115,905	$832,277	$5,357,913
2012	$1,023,181	$6,139,087	$933,637	$6,291,550
2013	$1,023,181	$7,162,268	$709,519	$7,001,069
2014	$1,023,181	$8,185,449	$709,519	$7,710,588
2015	$1,023,181	$9,208,630	$709,519	$8,420,107
2016	$1,023,181	$10,231,811	$709,519	$9,129,626
2017	$1,023,181	$11,254,992	$709,519	$9,839,145
2018	$1,023,181	$12,278,173	$709,519	$10,548,664
2019	$1,023,181	$13,301,354	$709,519	$11,258,183
2020	$1,023,181	$14,324,535	$709,519	$11,967,702
2021	$1,023,181	$15,347,716	$709,519	$12,677,221
2022	$1,023,181	$16,370,897	$709,519	$13,386,741
2023	$1,023,181	$17,394,079	$709,519	$14,096,260
2024	$1,023,181	$18,417,260	$709,519	$14,805,779
2025	$1,023,181	$19,440,441	$709,519	$15,515,298
2026	$1,023,181	$20,463,622	$709,519	$16,224,817

Annual costs are higher in the initial phase-in years, and level off as states' only activities are data entry and transfer. When the initial data population and transfer are complete, states will collectively save about $300,000 annually. As Table B-3 and the figure below show, after 2012, the cumulative costs for data development and data management via the database (represented by the solid line in the graph) are lower than they would have been to report by paper during the same time frame (the dashed line).


Comparison of State Costs:
Current Reporting Process vs. Database Transfer
$14.0
$12.0
$10.0
$8.0
$6.0
$4.0
$2.0
$0.0
Cost (millions)
2007
2008
2009
2010
2011
2012
2013
2014
2015
2016
2017
2018
Year
Paper-based
Automated transfer

APPENDIX C

Federal Register Notice on UIC Program Reporting Requirements

to the proceedings for this project should, on or before the comment date stated below, file with the Federal Energy Regulatory Commission, 888 First Street, NE., Washington, DC 20426, a motion to intervene in accordance with the requirements of the Commission's Rules of Practice and Procedure (18 CFR 385.214 or 385.211) and the Regulations under the NGA (18 CFR 157.10). A person obtaining party status will be placed on the service list maintained by the Secretary of the Commission and will receive copies of all documents filed by the applicant and by all other parties. A party must submit 14 copies of filings made with the Commission and must mail a copy to the applicant and to every other party in the proceeding. Only parties to the proceeding can ask for court review of Commission orders in the proceeding.

However, a person does not have to intervene in order to have comments considered. The second way to participate is by filing with the Secretary of the Commission, as soon as possible, an original and two copies of comments in support of or in opposition to this project. The Commission will consider these comments in determining the appropriate action to be taken, but the filing of a comment alone will not serve to make the filer a party to the proceeding. The Commission's rules require that persons filing comments in opposition to the project provide copies of their protests only to the party or parties directly involved in the protest.

Persons who wish to comment only on the environmental review of this project should submit an original and two copies of their comments to the Secretary of the Commission. Environmental commentors will be placed on the Commission's environmental mailing list, will receive copies of the environmental documents, and will be notified of meetings associated with the Commission's environmental review process. Environmental commentors will not be required to serve copies of filed documents on all other parties. However, the non-party commentors will not receive copies of all documents filed by other parties or issued by the Commission (except for the mailing of environmental documents issued by the Commission) and will not have the right to seek court review of the Commission's final order.

The Commission strongly encourages electronic filings of comments protests and interventions via the internet in lieu of paper. See 18 CFR 385.2001(a) (1) (iii) and the instructions on the Commission's web (*www.ferc.gov*) site under the ''e-Filing'' link.

Comment Date: March 15, 2007.

Magalie R. Salas,

Secretary.

[FR Doc. E7–3487 Filed 2–27–07; 8:45 am]

BILLING CODE 6717–01–P

DEPARTMENT OF ENERGY

Federal Energy Regulatory Commission

[Docket No. CP06–421–000]

Transcontinental Gas Pipe Line Corporation; Notice of Public Meeting for the Proposed Potomac Expansion Project

February 22, 2007.

The staff of the Federal Energy Regulatory Commission (FERC or Commission) is holding a public meeting for Transcontinental Gas Pipe Line Corporation's (Transco's) proposed Potomac Expansion Project. The project would consist of the construction of about 20 miles of new 42-inch-diameter pipeline in three loops located in Campbell, Pittsylvania, and Fairfax Counties, Virginia; and various aboveground facilities, including a proposed pig launcher/receiver facility at milepost 1,586.17 in Fairfax County, Virginia.

The meeting will be on Friday, March 2, 2007, at 7 p.m. (EST) in the Virginia Run Community Center, 15355 Wetherburn Court, Centreville, VA 20120.

This event is posted on the Commission's calendar located at *http://www.ferc.gov/EventCalendar/EventsList.aspx* along with other related information. For additional information, please contact the Commission's Office of External Affairs at 1–866–208–FERC.

Magalie R. Salas,

Secretary.

[FR Doc. E7–3490 Filed 2–27–07; 8:45 am]

BILLING CODE 6717–01–P

ENVIRONMENTAL PROTECTION AGENCY

[EPA–HQ–OW–2003–0017; FRL–8282–3]

Agency Information Collection Activities; Proposed Collection; Comment Request; Underground Injection Control (UIC) Program; EPA ICR No. 0370.19; OMB Control No. 2040–0042

AGENCY: Environmental Protection Agency (EPA).

ACTION: Notice.

SUMMARY: In compliance with the Paperwork Reduction Act (PRA) (44 U.S.C. 3501 *et seq.*), this document announces that EPA is planning to submit a request to renew an existing approved Information Collection Request (ICR) to the Office of Management and Budget (OMB). This ICR is scheduled to expire on April 30, 2007. Before submitting the ICR to OMB for review and approval, EPA is soliciting comments on specific aspects of the proposed information collection as described below.

DATES: Comments must be submitted on or before April 30, 2007.

ADDRESSES: Submit your comments, identified by Docket ID No. EPA–HQ–OW–2003–0017, by each item in the text, by one of the following methods:

- *http://www.regulations.gov:* Follow the on-line instructions for submitting comments.
- *E-mail: OW-Docket@epa.gov.*
- *Mail:* Environmental Protection Agency, *Mailcode:* MC 4101T, 1200 Pennsylvania Ave., NW., Washington, DC 20460.

Instructions: Direct your comments to Docket ID No. EPA–HQ–OW–2003–0017 identified by the Docket ID. EPA's policy is that all comments received will be included in the public docket without change and may be made available online at *http://www.regulations.gov*, including any personal information provided, unless the comment includes information claimed to be Confidential Business Information (CBI) or other information whose disclosure is restricted by statute. Do not submit information that you consider to be CBI or otherwise protected through *http://www.regulations.gov* or e-mail. The *http://www.regulations.gov* website is an ''anonymous access'' system, which means EPA will not know your identity or contact information unless you provide it in the body of your comment. If you send an e-mail comment directly to EPA without going through *http://www.regulations.gov*, your e-mail address will be automatically captured and included as part of the comment that is placed in the public docket and made available on the Internet. If you submit an electronic comment, EPA recommends that you include your name and other contact information in the body of your comment and with any disk or CD–ROM you submit. If EPA cannot read your comment due to technical difficulties and cannot contact you for clarification, EPA may not be able to consider your comment. Electronic files should avoid the use of

special characters, any form of encryption, and be free of any defects or viruses. For additional information about EPA's public docket visit the EPA Docket Center homepage at *http://www.epa.gov/epahome/dockets.htm.*

FOR FURTHER INFORMATION CONTACT: Robert E. Smith, Office of Ground Water and Drinking Water, Drinking Water Protection Division/Underground Injection Control Program, Mailcode: 4606M, Environmental Protection Agency, 1200 Pennsylvania Ave., NW., Washington, DC 20460; *telephone number:* 202–564–3895; *fax number:* 202–564–3756; e-mail *address: smith.robert-eu@epa.gov.*

SUPPLEMENTARY INFORMATION:

How Can I Access the Docket and/or Submit Comments?

EPA has established a public docket for this ICR under Docket ID No. EPA–HQ–OW–2003–0017, which is available for online viewing at *http://www.regulations.gov*, or in person viewing at the Water Docket, Docket in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., NW., Washington, DC. The EPA/DC Public Reading Room is open from 8 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is 202–566–1744, and the telephone for the Water Docket is 202–566–2426.

Use *http://www.regulations.gov* to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the contents of the docket, and to access those documents in the public docket that are available electronically. Once in the system, select ''search,'' then key in the docket ID number identified in this document.

What Information Is EPA Particularly Interested in?

Pursuant to section 3506(c)(2)(A) of the PRA, EPA specifically solicits comments and information to enable it to:

(i) Evaluate whether the proposed collection of information is necessary for the proper performance of the functions of the Agency, including whether the information will have practical utility;

(ii) Evaluate the accuracy of the Agency's estimate of the burden of the proposed collection of information, including the validity of the methodology and assumptions used;

(iii) Enhance the quality, utility, and clarity of the information to be collected; and

(iv) Minimize the burden of the collection of information on those who are to respond, including through the use of appropriate automated electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses. In particular, EPA is requesting comments from very small businesses (those that employ less than 25) on examples of specific additional efforts that EPA could make to reduce the paperwork burden for very small businesses affected by this collection.

What Should I Consider When I Prepare My Comments for EPA?

You may find the following suggestions helpful for preparing your comments:

1. Explain your views as clearly as possible and provide specific examples.

2. Describe any assumptions that you used.

3. Provide copies of any technical information and/or data you used that support your views.

4. If you estimate potential burden or costs, explain how you arrived at the estimate that you provide.

5. Offer alternative ways to improve the collection activity.

6. Make sure to submit your comments by the deadline identified under **DATES**.

7. To ensure proper receipt by EPA, be sure to identify the docket ID number assigned to this action in the subject line on the first page of your response. You may also provide the name, date, and **Federal Register** citation.

What Information Collection Activity or ICR Does This Apply to?

Affected entities: Entities potentially affected by this action are owners and operators underground injection wells, State Underground Injection Control (UIC) primacy agencies, and in some instances, U.S. EPA Regional offices and staff.

Title: Information Collection Request for the Underground Injection Control Program.

ICR numbers: EPA ICR No. 0370.19, OMB Control No. 2040–0042.

ICR status: This ICR is currently scheduled to expire on April 30, 2007. An Agency may not conduct or sponsor, and a person is not required to respond to, a collection of information, unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations in title 40 of the CFR, after appearing in the **Federal Register** when approved, are listed in 40 CFR part 9, are displayed either by publication in the **Federal Register** or by other appropriate means, such as on the related collection instrument or form, if applicable. The display of OMB control numbers in certain EPA regulations is consolidated in 40 CFR part 9.

Abstract: The Underground Injection Control (UIC) Program under the Safe Drinking Water Act established a Federal and State regulatory system to protect underground sources of drinking water (USDWs) from contamination by injected fluids. Injected fluids include over 9 billion gallons of hazardous waste per year and over two billion gallons of brine from oil and gas operations every day as well as automotive, industrial, sanitary and other wastes. Owners/operators of underground injection wells must obtain permits, conduct environmental monitoring, maintain records, and report results to EPA or the State UIC primacy agency. States must report to EPA on permittee compliance and related information. The mandatory information is reported using standardized forms and annual reports, and the regulations are codified at 40 CFR Parts 144 through 148. The data are used by UIC authorities to ensure the protection of underground sources of drinking water.

Burden Statement: The annual public reporting and recordkeeping burden for this collection of information is estimated to average 2.35 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements which have subsequently changed; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information.

The ICR provides a detailed explanation of the Agency's estimate, which is only briefly summarized here:

Estimated total number of potential respondents: 38,824.

Frequency of response: yearly, semi-annually, quarterly, and other.

Estimated total average number of responses for each respondent: 10.96.

Estimated total annual burden hours: 1,000,648 hours.

Estimated total annual costs: $117,142,617. This includes an

estimated burden cost of $34,934,361 and an estimated cost of $82,208,255 for capital investment or maintenance and operational costs.

In its ''Terms of Clearance'' for the current ICR, OMB asked EPA to report on its efforts to reduce burden on owners and operators of UIC injection wells. In response to this request, the Agency has undertaken an effort to study where further paperwork burden reduction is feasible. The UIC Program is reviewing UIC regulations requiring paperwork reporting/recordkeeping and then evaluating potential for burden reduction. Past efforts to reduce burden focused on analyzing data needs of the UIC Program and identifying ways to reduce burden on State primacy agencies that submit information to EPA. This effort resulted in reduced frequency with which states must submit several 7520 Federal reporting forms. Current efforts focus on how to reduce burden on owners and operators that submit specific 7520 owner/operator reporting forms. Areas of consideration are combining/revising some 7520 reporting forms, eliminating certain reporting requirements, eliminating data elements from the 7520 forms submitted by operators, reducing frequency and using options such as electronic data entry and transfer systems. EPA prepared a report that summarizes these efforts. This report can be found in the Water Docket for the UIC Program ICR under Docket ID No. EPA–HQ–OW–2003–0017 and is available for viewing in person at the EPA/DC Public Reading Room which is in the EPA Headquarters Library, Room Number 3334 in the EPA West Building, located at 1301 Constitution Ave., NW., Washington, DC.

Are There Changes in the Estimates From the Last Approval?

There is a decrease of 333,406 hours in the total estimated respondent burden compared with that identified in the ICR currently approved by OMB. This decrease primarily reflects abatement of permitting and closure under the 1999 Class V Rule; reduced Class V well inventory activities; and a reduction in the Class II inventory, particularly the number of Class II permit applications that operators will submit during the clearance period. These changes are adjustments.

What Is the Next Step in the Process for This ICR?

EPA will consider the comments received and amend the ICR as appropriate. The final ICR package will then be submitted to OMB for review and approval pursuant to 5 CFR 1320.12. At that time, EPA will issue another **Federal Register** notice pursuant to 5 CFR 1320.5(a)(1)(iv) to announce the submission of the ICR to OMB and the opportunity to submit additional comments to OMB. If you have any questions about this ICR or the approval process, please contact the technical person listed under **FOR FURTHER INFORMATION CONTACT**.

Dated: February 23, 2007.

Cynthia C. Dougherty,

Director, Office of Ground Water and Drinking Water.

[FR Doc. E7–3516 Filed 2–27–07; 8:45 am]

BILLING CODE 6560–50–P

ENVIRONMENTAL PROTECTION AGENCY

[FRL–8282–4]

Office of Research and Development; Ambient Air Monitoring Reference and Equivalent Methods: Designation of a New Equivalent Method

AGENCY: Environmental Protection Agency.

ACTION: Notice of the designation of a new equivalent method for monitoring ambient air quality.

SUMMARY: Notice is hereby given that the Environmental Protection Agency (EPA) has designated, in accordance with 40 CFR Part 53, a new equivalent method for measuring concentrations of ozone (O_3) in the ambient air.

FOR FURTHER INFORMATION CONTACT: Elizabeth Hunike, Human Exposure and Atmospheric Sciences Division (MD–D205–03), National Exposure Research Laboratory, U.S. EPA, Research Triangle Park, North Carolina 27711. Phone: (919) 541–3737, e-mail: *Hunike.Elizabeth@epa.gov.*

SUPPLEMENTARY INFORMATION: In accordance with regulations at 40 CFR Part 53, the EPA evaluates various methods for monitoring the concentrations of those ambient air pollutants for which EPA has established National Ambient Air Quality Standards (NAAQSs) as set forth in 40 CFR Part 50. Monitoring methods that are determined to meet specific requirements for adequacy are designated by the EPA as either reference methods or equivalent methods (as applicable), thereby permitting their use under 40 CFR Part 58 by States and other agencies for determining attainment of the NAAQSs.

The EPA hereby announces the designation of a new equivalent method for measuring concentrations of O_3 in the ambient air. This designation is made under the provisions of 40 CFR Part 53, as amended on December 18, 2006 (71 FR 61271).

The new equivalent method is an automated method (analyzer) that utilizes a measurement principle based on absorption of ultraviolet light by ozone at a wavelength of 254 nm. The newly designated equivalent method is identified as follows:

EQSA–0207–164, ''SIR S.A. Model S–5014 Photometric O_3 Analyzer,'' operated on the 0–500 ppb measurement range, within an ambient temperature range of 20 to 30 degrees C, with a sample inlet particulate filter, and with or without an optional PCMCIA card.

An application for an equivalent method determination for the candidate method based on this ozone analyzer was received by the EPA on August 4, 2006. The sampler is commercially available from the applicant, SIR USA, 1775 Pennsylvania Avenue, NW., Washington, DC 20006 or from SIR Spain, Avda. de la Industria, 3, 28760 Tres Cantos, Spain.

A test analyzer representative of this method has been tested in accordance with the applicable test procedures specified in 40 CFR Part 53 (as amended on December 18, 2006). After reviewing the results of those tests and other information submitted by the applicant in the application, EPA has determined, in accordance with Part 53, that this method should be designated as an equivalent method. The information submitted by the applicant in the application will be kept on file, either at EPA's National Exposure Research Laboratory, Research Triangle Park, North Carolina 27711 or in an approved archive storage facility, and will be available for inspection (with advance notice) to the extent consistent with 40 CFR Part 2 (EPA's regulations implementing the Freedom of Information Act).

As a designated reference or equivalent method, this method is acceptable for use by states and other air monitoring agencies under the requirements of 40 CFR Part 58, Ambient Air Quality Surveillance. For such purposes, the method must be used in strict accordance with the operation or instruction manual associated with the method and subject to any specifications and limitations (*e.g.*, configuration or operational settings) specified in the applicable designation method description (see the identifications of the method above).

Use of the method should also be in general accordance with the guidance and recommendations of applicable sections of the ''Quality Assurance Handbook for Air Pollution

APPENDIX D

Report on Underground Injection Control Program Burden Reduction Efforts

Introduction

EPA's Office of Ground Water and Drinking Water (OGWDW) is requesting OMB approval to renew the Underground Injection Control (UIC) Information Collection Request (ICR) to allow the continued collection of information under the UIC Program.

In its "Terms of Clearance" for the current ICR, the Office of Management and Budget (OMB) asked OGWDW to report on its efforts to reduce burden on owners and operators of injection wells.

The following report responds to OMB's request and describes EPA's efforts to assess the burden on well operators associated with the UIC Program's requirements and the efforts to identify potential burden reduction opportunities in the UIC Program.

UIC Burden Estimates

There are approximately 38,768 owners and operators of UIC wells who must collect information and periodically report to the State or EPA on well activities. The total annual burden on owners and operators of injection wells estimated in the approved ICR (EPA ICR number 0370.19; January 18, 2005) is 1,122,522 hours.[1] EPA has revised these estimates as part of the process of renewing the UIC ICR and expects the total annual owner/operator burden between 2007 and 2010 to be approximately 840,985 hours.

EPA expects a net reduction in operator burden of 281,537 hours between 2007 and 2010. This reduction reflects a combination of programmatic changes and adjustments to the UIC inventory, rather than changes in the reporting forms or frequency of reporting. Programmatic changes include activities associated with the Revision to Federal UIC Requirements for Class I Municipal Wells in Florida ("the Florida Rule") and reduced activity as a result of the 1999 Revisions to the Underground Injection Control Regulations for Class V Injection Wells ("the Class V Rule"). In addition, the burden estimate is expected to change to reflect adjustments to the inventory for Classes II and V.

Table 1 provides additional detail.

[1] The UIC Program ICR estimates the burden to primacy states as well; however, that burden is not included in the estimate of operator burden reduction noted above.

Table 1: Change in Annual Well Owner/Operator Burden Between Approved and Renewal ICRs

Type of Change	Change (hours)	Reason for Change
Florida Rule	1,472	Additional burden associated with compliance with 2005 Rule. Operators of certain Class I municipal wells in Florida will apply to modify their permits in order to be able to continue injecting.
Abatement of Class V Rule activities	-71,669	The burden associated with permitting and closure of motor vehicle waste disposal wells (MVWDWs) and closure of large capacity cesspools is largely complete. Most activities in the 2007 to 2010 clearance period will be associated with rule-required sampling by MVWDW operators who opted to apply for a permit.
Inventory adjustments	-211,339	For Class V injection wells, the Agency predicted an increase in the number of Class V wells during the 2004 to 2006 period because of the significant increase due to requirement to locate and document large capacity cesspools and motor vehicle waste disposal wells as part of the 1999 Class V Rule. For the 2007 to 2010 period the Agency expects a decrease in these activities as most of the wells subject to permitting and closure should have been identified. For Class II injection wells during 2004 to 2006, the Agency predicted an increase in Class II activities based on consultations with EPA regions and states. Based on consultations on activities between 2007 and 2010, some wells are expected to temporarily close and fewer permits are likely to be received in the future.
Total Change	**-281,536**	

Past Efforts to Address Operator Burden

In 1998, EPA convened a burden reduction workgroup to analyze the data needs of the UIC Program and identify possible ways to reduce burden. The workgroup consisted of representatives of 11 states and all 10 EPA regions (see Table 2 below).

Table 2: 7520 Workgroup Members

EPA Regions	**States**
David Delaney; Region I John Kushwara; Region II Roger Reinhart and Maria Conicelli; Region III Nancy Marsh and Frank Baker; Region IV Valoria Robinson; Region V Ray Leissner; Region VI Kurt Hildebrandt; Region VII Carol Bowden and Nathan Wiser; Region VIII Gregg Olson and George Robin; Region IX Grover Partee; Region X **EPA Headquarters** Richard Lawrence, Al Havinga, and Don Olson; OECA James Curtin; OGC Denny Cruz, (Workgroup Leader), Robyn Delehanty and Bruce Kobelski; OGWDW	Lindsay Taliaferro; Ohio Richard Ginn, Ben Knape, and Marty Barnes; Texas Mike Stettner; California Dave Watkins; West Virginia Mark Slifka; Idaho Richard Deuerling; Florida Michel Phillips and Bur Filson; Illinois Stan Belieu; Nebraska George Hudak; Montana Bob Lucht; Wyoming Larry Fiddler; Oklahoma

The workgroup focused its review on the information that primacy agencies submit to EPA and recommended that EPA reduce state burden by changing the frequency of state submissions. Based on these recommendations, in [add year] EPA made changes to the program that reduced the frequency with which states must submit several of the UIC Program's series 7520 reporting forms. The work group also recommended allowing Web-based entry of the data on some of the forms. Finally, the workgroup recommended reformatting the State reporting forms (the workgroup did not make recommendations about the owner/operator reporting forms). However, before any action was taken to approve the reformatted 7520 forms, OGWDW responded to requests to provide electronic reporting and embarked upon development of a national UIC database. The national database is being developed based on a "hybrid" set of data elements from both the approved forms and the workgroup's recommendations. The Agency expects the UIC database to be available as in 2007, allowing electronic entry and transmission of data from primacy agencies to EPA.

Current Efforts to Address Operator Burden

In 2006, in response to OMB requests, EPA stepped up its efforts to investigate and assess possibilities for burden reduction. EPA convened a study group composed of representatives from EPA headquarters and Regions to assess whether burden could be further reduced. This study group continues to evaluate burden reduction possibilities and complete recommendations will be made available in late 2007. A discussion of the areas this group is examining follows.

Combining/Revising the Reporting Forms

It may be possible to combine several of the 7520 reporting forms into a single multi-purpose form. These forms include the Completion forms (7520-9 and 7520-10), the Well Rework form

(7520-12), and the Plugging and Abandonment Plan (7520-14). EPA is evaluating whether combining the forms would result in any burden reduction.

The study group also discussed whether redesigning some of the data elements on the forms would reduce the total number of pages associated with UIC data collection, eliminate confusion, and facilitate completion of the forms. The study group is currently focusing its efforts on forms 7520-9 (Completion Form for Injection Wells), 7520- 10 (Completion Report for Brine Disposal, Hydrocarbon Storage, or Enhance Recovery Wells), 7520-12 (Well Rework Record), and 7520-14 (Plugging and Abandonment Plan).

Reducing Frequency of Reporting

It may be possible to reduce reporting burden by reducing reporting frequency. The study group found that monitoring and testing had a large number of respondents These activities account for nearly half of the total operator burden. We have examined these areas for possible burden reduction and have some areas to follow-up on whether burden can be reduced. As a possible next step, we could talk with states that run the UIC programs and the regulated community.

Table 3 summarizes the percent of total burden by activity.

Table 3: Annual Injection Well Operator Burden (by Activity Type)

Activity	Hours	Percent
*Permitting, startup, and inventory	151,684	35% of total
Monitoring/ testing	493,093	46% of total
Reporting	123,125	12% of total
Recordkeeping	59,360	6% of total
Well closure	13,396	1% of total
Other	184	0.02% of total
Total	**840,842**	

Source: ICR burden tables, last revised October 24, 2006.
*This is a one-time activity

Eliminating Data Elements from the 7520 Forms

The study group discussed the potential for eliminating some of the reporting elements on the 7520 forms submitted by well owners/operators. Although it is too early to tell the exact number of elements that could be eliminated, the study group acknowledged that some elements could be eliminated. The study group believes it is necessary to continue to require many of the existing data elements to ensure that injection wells are sited, constructed, and operated in an environmentally protective manner, however, it is working to refine a list of the elements that could be eliminated. Attachment 1 summarizes the analysis to date of the potential for eliminating data elements.

Additional Burden Reduction Options

Study group members made additional recommendations for burden reduction. The following is a description of these recommendations and associated activities.

- **Maintain and transfer all operator data electronically.** Electronic reporting of routinely-collected data would eliminate the need to collect, record on paper, and submit information to the permitting authority. A first step toward this goal is developing a database for transferring UIC data from regions and states to EPA Headquarters. Headquarters is currently developing a national UIC database (with plans to deploy it in 2007). Following this, it may be possible to provide well operators the option to report some information electronically. Headquarters estimates the database will reduce primacy agency burden. It is likely that electronic reporting may offer significant burden savings to those operators with electronic data transfer capabilities as well.

- **Create an electronic permitting system.** Electronic submission of permit application data could streamline the application review process. This option needs to be further explored. EPA must consider the states' ability to receive all of the required permit application attachments electronically (e.g., well logs and schematics), whether some information could be sent electronically, and the actual burden reduction relative to the cost of setting up such a system (the number of permit applications received each year by many states is limited and not all applicants would be able to use an electronic system).

- **Allow electronic entry of inventory information.** Operators that do not need to apply for a permit must submit basic inventory information about their wells to the permitting authority using the Injection Well Inventory form (7520-16) or an equivalent. A web-based data entry system could reduce burden to operators, especially those that submit multiple inventory forms for similar wells. (Regions and primacy agencies would benefit as well, since this would eliminate data entry from paper forms). EPA plans to enable web site entry of inventory information in 2007. States are likely to be the first to use this technology. Further analysis is needed to assess how web-entered data will be exported to other databases (e.g., state databases) as needed.

What Else Should the Agency Consider?

Where possible, examine whether operators submitting paperwork to DI programs could responsibly retain more of their reporting paperwork at their facilities and be made responsible for assuring that it is accurate, complete and available, at all times for inspection by UIC agencies. OGWDW recognizes that some of state regulatory requirements could be more stringent, making the implementation of some burden reduction practices less likely.

Attachment 1: Study Group Evaluation of Potential to Eliminate 7520 Form Elements

Element (Form number)	Members recommending Potential Elimination
FINDS number	10
Existing EPA permits	9
Ownership/ private, federal, other	6
Formation testing program	5
Injection procedures	5
Changes in injection fluid	5
Plans for well failure	5
Stimulation program	4
Corrective action plan	3
Monitoring program	3
Plugging and abandonment	1
Elements on Form 7520-7	
Non-lat/long locational data	7
Name and address of permittee	2
All of form 7520-8 – monitoring information	
Elements on Form 7520-9	
Description of surface equipment	7
Monitoring system	3
Well design and construction	2
As-built diagrammatic sketch	1

Element (Form number)	Members recommending Potential Elimination
Date drilling completed	6
Injection zone stimulation	4
Lease name	3
Wire line logs, list each type	3
Schematic or other drawing of surface & subsurface construction	2
Status of corrective action on defective wells in the area of review	2
Hole	1
Monthly monitoring information	3
Method of emplacement of cement plugs	2
Open hole/or perforated intervals and intervals where casing will be varied	1
Transaction type	6

Based on consultations with the regions, Headquarters is working on resolutions for these elements.

APPENDIX E

APPENDIX E

Underground Injection Control Program Reporting Forms

Number	Form
7520-1	Permit Review and Issuance/Wells in Area of Review
7520-2A	Compliance Evaluation
7520-2B	Compliance Evaluation - Significant Noncompliance
7520-3	Mechanical Integrity Test/Remedial Actions
7520-4	Quarterly Exceptions List
7520-6	UIC Permit Application
7520-7	Application to Transfer Permit
7520-8	Injection Well Monitoring report
7520-9	Completion Form for Injection Wells
7520-10	Completion Report for Brine Disposal, Hydrocarbon Storage, or Enhanced Recovery Well
7520-11	Annual Disposal/Injection Well Monitoring Report
7520-12	Well Rework Record
7520-14	Plugging and Abandonment Plan
7520-16	Inventory of Injection Wells
7520-17	Pre-Closure Notification Form

Please type or print all information. Please read instructions. OMB No. 2040-0042 Form Expires 1/31/05

United States Environmental Protection Agency
Office of Ground Water and Drinking Water
Washington, DC 20460

UIC Federal Reporting System
Part I: Permit Review and Issuance/ Wells in Area of Review

(This information is solicited under the authority of the Safe Drinking Water Act)

I. Name and Address of Reporting Agency

United States Environmental Protection Agency

II. Date Prepared *(month, day, year)*

III. State Contact *(name, telephone no.)*

IV. Reporting Period *(month, year)*

From: **October 1, 20**

To:

Item					Class and Type of Injection Wells						
					I	II SWD 2D	II ER 2R	II HC 2H	III	IV	V
V. Permit Application	Number of Permit Applications Received										
VI. Permit Determination	Permit Issued	A	Number of Individual Permits Issued *(One Well)*	New Wells							
				Existing Wells							
		B	Number of area Permits* Issued *(Multiple Wells)* *(*See instructions on back)*	New Well Field							
				Existing Well Field							
		C	Number of Wells in Area Permits *(See B above)*	New Wells							
				Existing Wells							
	Permit Not Issued	D	Number of Permits Denied/Withdrawn *(after complete technical review)*								
	Modification Issued	E	Number of Major Permit Modifications Approved								
VII. Permit File Review	Number of Rule-Authorized Class II Wells Reviewed			Wells Reviewed							
				Wells Deficient							
VIII. Area of Review (AOR)	Wells Reviewed	A	Number of Wells in Area of Review	Abandoned Wells							
				Other Wells							
	Wells Identified for C/A	B	Number of Wells Identified for Corrective Action	Abandoned Wells							
				Other Wells							
	Wells with C/A	C	1. Number of Wells in AOR with Casing Repaired/Recemented C/A								
			2. Number of Active Wells in AOR Plugged/Abandoned								
			3. Number of Abandoned Wells in AOR Replugged								
			4. Number of Wells in AOR with "Other" Corrective Action								

IX. Remarks/Ad Hoc Report *(Attach additional sheets if necessary)*

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature and Typed or Printed Name and Title of Person Completing Form	Date	Telephone No.

Instructions and Definitions

All reporting is cumulative, year to date, and begins with October 1.

Section V. Permit Application

Enter under each well class the total number of permit applications that have been received this year to date. Include all applications: complete and incomplete; individual and municipal well (Area Permit); and applications for "New" and "Existing" wells.

A "New Well" is any well other than an existing well or a plugged/abandoned well that became operable after the effective date of the State (or EPA) Underground Injection Control Program.

An "Existing Well" is any operable (i.e., active, under construction, shut in, or temporarily abandoned) injection well or a properly plugged and abandoned injection well that was in existence on the effective date of the State (or EPA) UIC Program.

Section VI. Permit Determination

Permit Determinations include the approval or denial of UIC permit request/actions such as: applications for permits, major modifications to issued permits, revocation and reissuance of permits, or termination of permits for cause. A complete permit determination includes a thorough technical evaluation of the request, public notification or review before issuance, and a final decision document signed by the regulating authority.

Item A: Enter under each well class the number of individual permits issued for "New" or "Existing" wells this year to date.

Item B: Enter under each well class the number of area permits that have been issued for "New" or "Existing" well fields this year to date. ("New" in this case, describes a nonhazardous injection well field having only new wells or a mixture of new and existing wells. "Existing" describes a nonhazardous well field having only existing wells.)

Item C: Enter under each well class the number of "New" and "Existing" wells covered by the Area Permits entered in Item B.

Item D: Enter under each well class the number of permits or major modifications denied by the State (or EPA) UIC program and/or permits withdrawn by applicants this year to date. The denial of a permit or major modification should be included as a permit determination only after there has been a complete technical review.

Item E: Enter under each well class the number of major modifications approved this year to date. An approved major modification requires a complete technical review, public notification or review, and a final decision document signed by the regulating authority.

Section VII. Permit File Review

A complete technical review of an existing (rule authorized) Class II well record may be conducted by the authorized regulating
authority in lieu of a permit determination in accordance with the
UIC 1425 Guidance to determine whether the well is in compliance with UIC regulatory requirements. The well record (or file) review may include an evaluation of siting reports, wells in the area of review, construction, operating, monitoring or other State reports. Existing Class II wells should be routinely reviewed at least once every five years during the life of the well.

Well Reviewed: Enter under the appropriate category of injection wells the number of rule authorized (existing) Class II wells with permit files reviewed and compliance status determined this year to date.

Well Deficient: Enter under the Class II well class the number of reviewed rule authorized Class II wells found deficient (not in compliance) that received corrective or enforcement action as appropriate followup response.

Section VIII. Area of Review (AOR)

All wells that penetrate the injection zone in the AOR of an injection well/field are reviewed during permit determination or during any AOR analysis of a rule authorized well file.

Item A: Enter under the well class of each permit application or file that has been reviewed this year to date, the number of "Abandoned" and "Other" wells reviewed in the AOR.

"Abandoned" includes any well penetrating the injection zone in the AOR that has been properly or improperly plugged and/or abandoned. "Other" includes any producing well, operable injection well, dry hole, exploratory well, etc., that penetrates the injection zone in the AOR.

Corrective Action is required for those wells that penetrate the injection zone in the AOR that are improperly sealed, completed, or abandoned.

Item B: Enter under the well class of each permit applications or file reviewed this year to date, all "Abandoned" and "Other" wells in the AOR that have required corrective action.

Item C: Enter under the well class of all permit applications or files that have been reviewed, the number of wells in the AOR which have received corrective action (be specific) this year to date.

Paperwork Reduction Act Notice

The public reporting and record keeping burden for this collection of information is estimated to average 4.5 hours per year. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.

Please type or print all information. Please read instructions on reverse. OMB No. 2040-0042 Approval Expires 1/31/05

United States Environmental Protection Agency
Office of Ground Water and Drinking Water
Washington, DC 20460

UIC Federal Reporting System
Part II: Compliance Evaluation

(This information is solicited under the authority of the Safe Drinking Water Act)

I. Name and Address of Reporting Agency

United States Environmental Protection Agency

II. Date Prepared *(month, day, year)*

III. State Contact *(name, telephone no.)*

IV. Reporting Period *(month, year)*

From: **October 1, 20**

To:

Item				Class and Type of Injection Wells						
				I	II SWD 2D	II ER 2R	II HC 2H	III	IV	V
V. Summary of Violations	Total Wells	A	Number of Wells with Violations							
	Total Violations	B	1. Number of Unauthorized Injection Violations							
			2. Number of Mechanical Integrity Violations							
			3. Number of Operation and Maintenance Violations							
			4. Number of Plugging and Abandonment Violations							
			5. Number of Monitoring and Reporting Violations							
			6. Number of Other Violations *(Specify)*							
VI. Summary of Enforcement	Total Wells	A	Number of Wells with Enforcement Actions							
	Total Enforcement Actions	B	1. Number of Notices of Violation							
			2. Number of Consent Agreements							
			3. Number of Administrative Orders							
			4. Number of Civil Referrals							
			5. Number of Criminal Referrals							
			6. Number of Well Shut-ins							
			7. Number of Pipeline Severances							
			8. Number of Other Enforcement Actions *(Specify)*							
VII. Summary of Compliance	Number of Wells Returned to Compliance		A. This Quarter							
			B. This Year							
VIII. Contamination	Number of Cases of Alleged Contamination of a USDW									
IX. MIT Resolved	Percent of MIT Violations Resolved in 90 Days									

X. Remarks/Ad Hoc Report *(Attach additional sheets)*

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature and Typed or Printed Name and Title of Person Completing Form	Date	Telephone No.

Definitions and Instructions

All reporting is cumulative, year to date, and begins with October 1.

A Class II, III, or V injection well with a violation of a permit or rule requirement is said to be in noncompliance. A Class I or IV well with any violation is said to be in significant noncompliance (SNC). Note: A Class II, III, or V well with certain types of violations may also be in significant noncompliance. (See Form 7520-2B (Reverse) for definitions of SNC violations.)

Section V. Summary of Violations

(Includes all noncompliance, significant and non-significant)

Note: Also Report Significant Noncompliance Information on Form 7520-2B.

A. Total Wells: Enter under each well class the number of wells with a violation(s) identified this year to date, whether or not the well has been returned to compliance. These totals track the percentage of the injection well universe in noncompliance each year. Enter a well only once each year.

B. Total Violations:

Item 1-6: Enter under each well class the number of times each violation (be specific) has been identified this year to date.

Section VI. Summary of Enforcement

A. Total Wells: Enter under each well class the number of wells with violations that have received an enforcement action(s) this year to date. These totals track the percentage of the injection well universe that receives an enforcement action each year. Enter a well only once each year.

B. Total Enforcement Actions:

Item 1-8: Enter under each well class the number of times wells with violations have received an enforcement action(s) (be specific) this year to date.

Section VII. Number of Wells Returned to Compliance

A "Well Returned to Compliance" is a well in violation of UIC program requirements that has had the violation(s) corrected and the resolution of the violation(s) has been verified by the regulating authority. Note: An enforcement action alone (e.g., well shut-in) does not constitute a "return to compliance."

A. Enter under each well class the number of wells returned to compliance in the current quarter only.

B. Enter under each well class the number of wells returned to compliance (as a result of an enforcement action against a violation) this year to date. These totals track the percentage of the injection well universe that returned to compliance through an enforcement action(s) each year. Enter a well only once each year.

Section VIII. USDW Contaminations

Enter under each well class the number of times a well in noncompliance has allegedly contaminated an underground source of drinking water (USDW) this year to date.

Section IX. % MIT Violations Resolved in 90 Days

Enter under each well class the percentage of MIT violations (identified in Section V., under "Mechanical Integrity") resolved within 90 days.

In order to calculate the percentage:

1. Add up the total number of MIT violations to date whether of not they were identified in this reporting period, e.g., 10.

2. Add up the number of these violations to date that were resolved in 90 days or less, e.g., 5.

3. Calculate the percentage of total MIT violations to date that have been resolved in 90 days or less, e.g., 50%.

Please type or print all information. Please read instructions on reverse. OMB No. 2040-0042 Approval Expires 1/31/05

United States Environmental Protection Agency
Office of Ground Water and Drinking Water
Washington, DC 20460

UIC Federal Reporting System
Part II: Compliance Evaluation
Significant Noncompliance

(This information is solicited under the authority of the Safe Drinking Water Act)

I. Name and Address of Reporting Agency

United States Environmental Protection Agency

II. Date Prepared *(month, day, year)*

III. State Contact *(name, telephone no.)*

IV. Reporting Period *(month, year)*

From: **October 1, 20**

To:

Item				Class and Type of Injection Wells						
				I	II SWD 2D	II ER 2R	II HC 2H	III	IV	V
V. Summary of Significant Non-Compliance (SNC)	Total Wells	A	Number of Wells with SNC Violations							
	Total Violations	B	1. Number of Unauthorized Injection SNC Violations							
			2. Number of Mechanical Integrity SNC Violations							
			3. Number of Injection Pressure SNC Violations							
			4. Number of Plugging and Abandonment SNC Violations							
			5. Number of SNC Violations of Formal Orders							
			6. Number of Falsification SNC Violations							
			7. Number of Other SNC Violations *(Specify)*							
VI. Summary of Enforcement Against SNC	Total Wells	A	Number of Wells with Enforcement Actions Against SNC							
	Total Enforcement Actions	B	1. Number of Notices of Violation							
			2. Number of Consent Agreements/Orders							
			3. Number of Administrative Orders							
			4. Number of Civil Referrals							
			5. Number of Criminal Referrals							
			6. Number of Well Shut-ins							
			7. Number of Pipeline Severances							
			8. Number of Other Enforcement Actions Against SNC Violations *(Specify)*							
VII. Summary of Compliance	Number of Wells in SNC Returned to Compliance		A. This Quarter							
			B. This Year							
VIII. Contamination	Number of Cases of Alleged Contamination of a USDW									
IX. Well Closure	Class IV/Endangering Class V Well Closures		Involuntary Well Closure							
			Voluntary Well Closure							

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature and Typed or Printed Name and Title of Person Completing Form	Date	Telephone No.

Instructions and Definitions
EPA Form 7520-2B

Section IV. Reporting Period: All reporting is cumulative, year to date, beginning with October 1.

Definitions of SNC Violations:

1. Violations of any kind pertaining to a Class I or IV well.

2. The following violations by the owner/operator of a Class II, III, or V well:

a. Unauthorized Injection – Any unauthorized emplacement of fluids (where formal authorization is required);

b. Mechanical Integrity – Well operation without mechanical integrity which causes the movement of fluid outside the authorized zone – if injection of such fluid may have the potential for endangering a USDW;

c. Injection Pressure – Well operation at an injection pressure that exceeds the permitted or authorized injection pressure and causes the movement of fluid outside the authorized zone of injection – if such movement may have the potential for endangering a USDW;

d. Plugging and Abandonment – The plugging and abandonment of an injection well in an unauthorized manner. This definition includes the "walking away from" a responsibility to plug and abandon a well. These wells are in SNC only when there is endangerment of USDW and there is an identifiable owner/operator;

e. Violation of a Formal Order – Any violation of a formal enforcement action, including an administrative or judicial order, consent agreement, judgement, or equivalent State action;

f. Falsification – The knowing submission or use of any false information in a permit application, periodic report or special request for information about a well.

Section V. Total No. of Wells with SNC Violations:
Significant Noncompliance information is also to be reported on EPA From 7520-2A. Under each well class and type, enter the total number of SNC violations which have been identified in the year to date, whether or not the violations(s) have been corrected and the well(s) returned to compliance. *These totals track the percentage of the injection well universe in SNC each year. Enter a well only once each year.*

For subsections 1 through 7 enter under each well class the total number of times, by specific violation, an SNC has been identified this year to date.

Section VI. Total SNC Enforcement Actions: *Significant Noncompliance information is also to be reported on EPA Form 7520-2A.* Under each well class and type, enter the total number of wells with SNC violations that have received an enforcement action(s) this year to date, whether or not the wells have been returned to compliance. *These totals track the percentage of the injection well universe that receives an SCN enforcement action each year. Enter a well only once each year.*

For subsections 1 through 8 enter under each well class the total number of times wells with SNC violations have received the specified enforcement action this year to date.

Section VII. No. of Wells Returned to Compliance: *A "Well Returned to Compliance" is a well in violation of UIC program requirements which has had the violation(s) corrected and has had the resolution of the violation(s) verified by the regulating authority. An enforcement action alone (e.g., well shut-in) does not constitute a "Return to Compliance."*

Under subsection A, enter under each well class the total number of wells returned to compliance (as a result of an enforcement action against an SNC violation) in the current quarter only. Under subsection B, enter under each well class the total number of wells returned to compliance (as a result of an enforcement action against an SNC violation) this year to date. *These totals track the percentage of the injection well universe that returned to compliance through an SNC enforcement action(s) each year. Enter a well only once each year.*

Section VIII. USDW Contaminations

Enter under each well class the number of times a well in SNC has allegedly contaminated an underground source of drinking water (USDW) this year to date.

Section IX. Number of Class IV/V Endangering Class V Well Closures: Enter the number of Class IV and Class V well closures either as a voluntary or involuntary action. Involuntary well closure means wells closed as a result of enforcement actions or permit call-ins. Voluntary well closure means well closed as a direct result of outreach activities. Well closure describes a process to permanently discontinue injection of an unauthorized and en-dangering fluid contaminant which is in violation of RCRA or SDWA or applicable regulations. At the time, closure must include immediate cessation of injection of unauthorized waste stream to satisfy SDWA requirements. To satisfy both SDWA and RCRA, well closure may require additional actions: remove injection fluids deposited in well, sludge and any visibly contaminated soil; segregate hazardous waste streams from sanitary waste streams (septic system) and redirect HW to holding tank; restrict injection to authorized waste stream; seal floor drain; obtain authorized sewer hook-up; remove well, injectate and contaminated soil and dispose in authorized facility. Imminent threat to USDW may require monitoring and ground-water remediation.

Paperwork Reduction Act
The public reporting and record keeping burden for this collection of information is estimated to average 5.5 hours per response. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, DC 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.

Please type or print all information. Please read instructions on reverse. OMB No. 2040-0042 Approval Expires 1/31/05

United States Environmental Protection Agency
Office of Ground Water and Drinking Water
Washington, DC 20460

UIC Federal Reporting System
Part III: Inspections
Mechanical Integrity Testing

(This information is solicited under the authority of the Safe Drinking Water Act)

I. Name and Address of Reporting Agency

United States Environmental Protection Agency

II. Date Prepared *(month, day, year)*

III. State Contact *(name, telephone no.)*

IV. Reporting Period *(month, year)*

From: **October 1, 20**

To:

Item				Class and Type of Injection Wells						
				I	II SWD 2D	II ER 2R	II HC 2H	III	IV	V
V. Summary of Inspections	Total Wells	A	Number of Wells Inspected							
	Total Inspections	B	1. Number of Mechanical Integrity Tests (MIT) Witnessed							
			2. Number of Emergency Response or Complaint Response Inspections							
			3. Number of Well Constructions Witnessed							
			4. Number of Well Pluggings Witnessed							
			5. Number of Routine/Periodic Inspections							
VI. Summary of Mechanical Integrity (MI)	Total Wells	A	Number of Wells Tested or Evaluated for Mechanical Integrity (MI)							
		B	No. of Rule-Authorized Wells Tested/Evaluated for MI — Passed 2-part test							
			No. of Rule-Authorized Wells Tested/Evaluated for MI — Failed 2-part test							
	For Significant Leak	C	1. Number of Annulus Pressure Monitoring Record Evaluations — Well Passed							
			1. Number of Annulus Pressure Monitoring Record Evaluations — Well Failed							
			2. No. of Casing/Tubing Pressure Tests — Well Passed							
			2. No. of Casing/Tubing Pressure Tests — Well Failed							
			3. Number of Monitoring Record Evaluations — Well Passed							
			3. Number of Monitoring Record Evaluations — Well Failed							
			4. No. of Other Significant Leak Tests/Evaluations *(Specify)* — Well Passed							
			4. No. of Other Significant Leak Tests/Evaluations *(Specify)* — Well Failed							
	For Fluid Migration	D	1. Number of Cement Record Evaluations — Well Passed							
			1. Number of Cement Record Evaluations — Well Failed							
			2. Number of Temperature/Noise Log Tests — Well Passed							
			2. Number of Temperature/Noise Log Tests — Well Failed							
			3. No. of Radioactive Tracer/Cement Bond Tests — Well Passed							
			3. No. of Radioactive Tracer/Cement Bond Tests — Well Failed							
			4. No. of Other Fluid Migration Tests/Evaluations *(Specify)* — Well Passed							
			4. No. of Other Fluid Migration Tests/Evaluations *(Specify)* — Well Failed							
VII. Summary of Remedial Action	Total Wells	A	Number of Wells with Remedial Action							
	Total Remedial Actions	B	1. Number of Casing Repaired/Squeeze Cement Remedial Actions							
			2. Number of Tubing/Packer Remedial Actions							
			3. Number of Plugging/Abandonment Remedial Actions							
			4. Number of Other Remedial Actions *(Specify)*							

VIII. Remarks/Ad Hoc Report *(Attach additional sheets)*

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature and Typed or Printed Name and Title of Person Completing Form	Date	Telephone No.

Instructions and Definitions

(All reporting is cumulative, year to date, and begins with October 1.)

Section V. Summary of Inspections

A complete inspection should include an assessment of: the well head, pressure and flow meters, pipeline connections, and any other equipment associated with the injection system; an inspection is complete only when a report has been filed with the regulating authority.

Item A: Enter under each well class the number of wells that have been inspected this year to date. These totals track the percentage of the injection well universe inspected each year. Enter a well only once each year.

Total Inspections: (This year to date)

Item 1: Enter under each well class the number of inspections to witness field Mechanical Integrity Tests. (At least 25% of MITs performed by operators each year should be witnessed.)

Item 2: Enter under each well class the number of inspections that have been in response to a problem reported to the regulating authority.

Item 3: Enter under each well class the number of inspections of well constructions or any preoperational activities.

Item 4: Enter under each well class the number of inspections of well pluggings or pluggings and abandonment.

Item 5: Enter under each well class the number of inspections that have been routine/periodic.

Section VI. Summary of Mechanical Integrity

A complete MIT is composed of a test for significant leaks in the casing, tubing or packer and a test for significant fluid migration into a USDW through vertical channels adjacent to the well bore. An MIT consists of a field test on a well or an evaluation of a well's monitoring records (i.e., annulus pressure, etc.) or cement records. At a minimum, the mechanical integrity of a Class I, II, or III (solution mining of salt) well should be demonstrated at least once every five years during the life of the well.

Item A: Enter under each well class the number of wells that have had a complete MIT this year to date. These totals track the percentage of the injection well universe tested for MI each year. Enter a well only once each year.

Item B: Enter under the appropriate well class the number of rule authorized wells that have passed a complete MIT and the number that have failed a complete MIT this year to date.

Item C: Significant Leak Tests: (This year to date)

Item 1-4: Enter under each well class the number of times wells have passed or failed a field test/record evaluation for significant leaks (be specific).

Item D. Fluid Migration Tests: (This year to date)

Items 1-4: Enter under each well class the number of times wells have passed or failed a field test/record evaluation for fluid migration (be specific).

Section VII. Summary of Remedial Action

A failure of mechanical integrity (MI) may occur at any time during the life of an injection well until it is plugged and abandoned in accordance with a preapproved plan. Failure may be identified during an inspection, a field test, an evaluation of well records, or during routine operation of a well. Remedial actions include additional permit conditions, monitoring or testing, or one of the actions specified below.

Item A: Enter under each well class the number of wells that have received remedial actions this year to date. This total tracks the percentage of the injection well universe that have received remedial action each year. Enter a well only once each year.

Total Remedial Actions: (This year to date)

Item 1-4: Enter under each well class the number of times that wells have received remedial action (be specific).

United States Environmental Protection Agency
Office of Ground Water and Drinking Water
Washington, DC 20460

OMB No. 2040-0042
Approval expires 1/31/05

UIC Federal Reporting System
Part IV: Quarterly Exceptions List

(This information is collected under the authority of the Safe Drinking Water Act)

I. Reporting Period

From | To

II. Well Class and Type	III. Name and Address of Owner/Operator	IV. Well ID No. (Permit No.)	V. Summary of Violations								VI. Summary of Enforcement									VII. Date Compliance Achieved
			Date of Violation	Mark ('X') Violation Type							Date of Enforcement	Mark ('X') Enforcement Type								
				Unauthorized Injection	Well Mechanical Integrity	Injection Pressure	Plugging and Abandonment	Formal Order	Falsification	Other (Specify)		Notice of Violation	Consent Agreement	Administrative Order	Civil Referral	Criminal Referral	Well Shut-in	Pipeline Severance	Other (Specify)	

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature of Person Completing Form	Typed or Printed Name and Title	Date	Telephone No.

Instructions and Definitions

The quarterly Exceptions list is used to track wells reported in significant noncompliance (SNC) on EPA Form 7520-2B for two or more consecutive quarters without being addressed with a formal enforcement action or returned to compliance. Any SNC reported on Form 7520-4 shall be reported until the SNC is resolved. Once a SNC is reported as resolved, it need not appear in subsequent reports.

Section I - Reporting Period

All reporting is cumulative, year to date, beginning with October 1.

Section II - Well Class and Type

Enter the well class and type of each well in SNC for two or more consecutive quarters. For Class I wells, specify IH for hazardous waste, IM of municipal waste, Ii for industrial waste. For Class II wells, specify IID for saltwater disposal, IIR for enhanced recovery, IIH for liquid hydrocarbon storage.

Section III - Name and Address of Owner/Operator

Enter the name and address of the owner/operator of the injection well. Use multiple lines of the form if needed. (You may use one form for each owner/operator.)

Section IV - Well ID No. (Permit No.)

Enter the I.D. number of the injection well in SNC. If the well has a UIC permit number, enter this as the I.D. number.

Section V - Summary of Violations

Enter the date the SNC violation was first identified and place an "X" in the appropriate column. In the event that there were multiple SNC violations for a single well, enter each violation and the date it was identified on a separate line.

Section VI - Summary of Enforcement

Enter the date an enforcement action was taken against the SNC violation and place an "X" in the appropriate column. In the event that there were multiple enforcement actions, enter each enforcement action and the date it was taken on a separate line.

OMB No. 2040-0042 Approval Expires 1/31/05

United States Environmental Protection Agency

Underground Injection Control Permit Application

(Collected under the authority of the Safe Drinking Water Act. Sections 1421, 1422, 40 CFR 144)

I. EPA ID Number			
		T/A	C
U			

Read Attached Instructions Before Starting

For Official Use Only

Application approved mo	day	year	Date received mo	day	year	Permit Number	Well ID	FINDS Number

II. Owner Name and Address			III. Operator Name and Address		
Owner Name			Owner Name		
Street Address		Phone Number	Street Address		Phone Number
City	State	ZIP CODE	City	State	ZIP CODE

IV. Commercial Facility	V. Ownership	VI. Legal Contact	VII. SIC Codes
☐ Yes ☐ No	☐ Private ☐ Federal ☐ Other	☐ Owner ☐ Operator	

VIII. Well Status *(Mark "x")*

☐ A. Operating	Date Started mo	day	year	☐ B. Modification/Conversion	☐ C. Proposed

IX. Type of Permit Requested *(Mark "x" and specify if required)*

☐ A. Individual ☐ B. Area	Number of Existing Wells	Number of Proposed Wells	Name(s) of field(s) or project(s)

X. Class and Type of Well *(see reverse)*

A. Class(es) (enter code(s))	B. Type(s) (enter code(s))	C. If class is "other" or type is code 'x,' explain	D. Number of wells per type (if area permit)

XI. Location of Well(s) or Approximate Center of Field or Project

Latitude Deg	Min	Sec	Longitude Deg	Min	Sec	Township and Range Sec	Twp	Range	1/4 Sec	Feet From	Line	Feet From	Line

XII. Indian Lands (Mark 'x')

☐ Yes
☐ No

XIII. Attachments

(Complete the following questions on a separate sheet(s) and number accordingly; see instructions)

For Classes I, II, III, (and other classes) complete and submit on a separate sheet(s) Attachments A--U (pp 2-6) as appropriate. Attach maps where required. List attachments by letter which are applicable and are included with your application.

XIV. Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibliity of fine and imprisonment. (Ref. 40 CFR 144.32)

A. Name and Title *(Type or Print)*	B. Phone No. *(Area Code and No.)*
C. Signature	D. Date Signed

Well Class and Type Codes

Class I Wells used to inject waste below the deepest underground source of drinking water.

Type "I" Nonhazardous industrial disposal well
"M" Nonhazardous municipal disposal well
"W" Hazardous waste disposal well injecting below USDWs
"X" Other Class I wells (not included in Type "I," "M," or "W")

Class II Oil and gas production and storage related injection wells.

Type "D" Produced fluid disposal well
"R" Enhanced recovery well
"H" Hydrocarbon storage well (excluding natural gas)
"X" Other Class II wells (not included in Type "D," "R," or "H")

Class III Special process injection wells.

Type "G" Solution mining well
"S" Sulfur mining well by Frasch process
"U" Uranium mining well (excluding solution mining of conventional mines)
"X" Other Class III wells (not included in Type "G," "S," or "U")

Other Classes Wells not included in classes above.
Class V wells which may be permitted under §144.12.
Wells not currently classified as Class I, II, III, or V.

Attachments to Permit Application

Class	Attachments
I new well	A, B, C, D, F, H – S, U
existing	A, B, C, D, F, H – U
II new well	A, B, C, E, G, H, M, Q, R; optional – I, J, K, O, P, U
existing	A, E, G, H, M, Q, R, – U; optional – J, K, O, P, Q
III new well	A, B, C, D, F, H, I, J, K, M – S, U
existing	A, B, C, D, F, H, J, K, M – U
Other Classes	To be specified by the permitting authority

INSTRUCTIONS - Underground Injection Control (UIC) Permit Application

Paperwork Reduction Act: The public reporting and record keeping burden for this collection of information is estimated to average 394 hours for a Class I hazardous well application, 252 hours for a Class I non-hazardous well application, 32 hours for a Class II well application, and 119 hours for a Class III well application. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, DC 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.

This form must be completed by all owners or operators of Class I, II, and III injection wells and others who may be directed to apply for permit by the Director.

I. **EPA I.D. NUMBER** - Fill in your EPA Identification Number. If you do not have a number, leave blank.

II. **OWNER NAME AND ADDRESS** - Name of well, well field or company and address.

III. **OPERATOR NAME AND ADDRESS** - Name and address of operator of well or well field.

IV. **COMMERCIAL FACILITY** - Mark the appropriate box to indicate the type of facility.

V. **OWNERSHIP** - Mark the appropriate box to indicate the type of ownership.

VI. **LEGAL CONTACT** - Mark the appropriate box.

VII. **SIC CODES** - List at least one and no more than four Standard Industrial Classification (SIC) Codes that best describe the nature of the business in order of priority.

VIII. **WELL STATUS** - Mark Box A if the well(s) were operating as injection wells on the effective date of the UIC Program for the State. Mark Box B if wells(s) existed on the effective date of the UIC Program for the State but were not utilized for injection. Box C should be marked if the application is for an underground injection project not constructed or not completed by the effective date of the UIC Program for the State.

IX. **TYPE OF PERMIT** - Mark "Individual" or "Area" to indicate the type of permit desired. Note that area permits are at the discretion of the Director and that wells covered by an area permit must be at one site, under the control of one person and do not inject hazardous waste. If an area permit is requested the number of wells to be included in the permit must be specified and the wells described and identified by location. If the area has a commonly used name, such as the "Jay Field," submit the name in the space provided. In the case of a project or field which crosses State lines, it may be possible to consider an area permit if EPA has jurisdiction in both States. Each such case will be considered individually, if the owner/operator elects to seek an area permit.

X. **CLASS AND TYPE OF WELL** - Enter in these two positions the Class and type of injection well for which a permit is requested. Use the most pertinent code selected from the list on the reverse side of the application. When selecting type X please explain in the space provided.

XI. **LOCATION OF WELL** - Enter the latitude and longitude of the existing or proposed well expressed in degrees, minutes, and seconds or the location by township, and range, and section, as required by 40 CFR Part 146. If an area permit is being requested, give the latitude and longitude of the approximate center of the area.

XII. **INDIAN LANDS** - Place an "X" in the box if any part of the facility is located on Indian lands.

XIII. **ATTACHMENTS** - Note that information requirements vary depending on the injection well class and status. Attachments for Class I, II, III are described on pages 4 and 5 of this document and listed by Class on page 2. Place EPA ID number in the upper right hand corner of each page of the Attachments.

XIV. **CERTIFICATION** - All permit applications (except Class II) must be signed by a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, and by a principal executive or ranking elected official for a public agency. For Class II, the person described above should sign, or a representative duly authorized in writing.

INSTRUCTIONS - Attachments

Attachments to be submitted with permit application for Class I, II, III and other wells.

A. **AREA OF REVIEW METHODS** - Give the methods and, if appropriate, the calculations used to determine the size of the area of review (fixed radius or equation). The area of review shall be a fixed radius of 1/4 mile from the well bore unless the use of an equation is approved in advance by the Director.

B. **MAPS OF WELL/AREA AND AREA OF REVIEW** - Submit a topographic map, extending one mile beyond the property boundaries, showing the injection well(s) or project area for which a permit is sought and the applicable area of review. The map must show all intake and discharge structures and all hazardous waste treatment, storage, or disposal facilities. If the application is for an area permit, the map should show the distribution manifold (if applicable) applying injection fluid to all wells in the area, including all system monitoring points. Within the area of review, the map must show the following:

Class I

The number, or name, and location of all producing wells, injection wells, abandoned wells, dry holes, surface bodies of water, springs, mines (surface and subsurface), quarries, and other pertinent surface features, including residences and roads, and faults, if known or suspected. In addition, the map must identify those wells, springs, other surface water bodies, and drinking water wells located within one quarter mile of the facility property boundary. Only information of public record is required to be included in this map;

Class II

In addition to requirements for Class I, include pertinent information known to the applicant. This requirement does not apply to existing Class II wells;

Class III

In addition to requirements for Class I, include public water systems and pertinent information known to the applicant.

C. **CORRECTIVE ACTION PLAN AND WELL DATA** - Submit a tabulation of data reasonably available from public records or otherwise known to the applicant on all wells within the area of review, including those on the map required in B, which penetrate the proposed injection zone. Such data shall include the following:

Class I

A description of each well's types, construction, date drilled, location, depth, record of plugging and/or completion, and any additional information the Director may require. In the case of new injection wells, include the corrective action proposed to be taken by the applicant under 40 CFR 144.55.

Class II

In addition to requirement for Class I, in the case of Class II wells operating over the fracture pressure of the injection formation, all known wells within the area of review which penetrate formations affected by the increase in pressure. This requirement does not apply to existing Class II wells.

Class III

In addition to requirements for Class I, the corrective action proposed under 40 CFR 144.55 for all Class III wells.

D. **MAPS AND CROSS SECTION OF USDWs** - Submit maps and cross sections indicating the vertical limits of all underground sources of drinking water within the area of review (both vertical and lateral limits for Class I), their position relative to the injection formation and the direction of water movement, where known, in every underground source of drinking water which may be affected by the proposed injection. (Does not apply to Class II wells.)

E. **NAME AND DEPTH OF USDWs (CLASS II)** - For Class II wells, submit geologic name, and depth to bottom of all underground sources of drinking water which may be affected by the injection.

F. **MAPS AND CROSS SECTIONS OF GEOLOGIC STRUCTURE OF AREA** - Submit maps and cross sections detailing the geologic structure of the local area (including the lithology of injection and confining intervals) and generalized maps and cross sections illustrating the regional geologic setting. (Does not apply to Class II wells.)

G. **GEOLOGICAL DATA ON INJECTION AND CONFINING ZONES (Class II)** - For Class II wells, submit appropriate geological data on the injection zone and confining zones including lithologic description, geological name, thickness, depth and fracture pressure.

H. **OPERATING DATA** - Submit the following proposed operating data for each well (including all those to be covered by area permits): (1) average and maximum daily rate and volume of the fluids to be injected; (2) average and maximum injection pressure; (3) nature of annulus fluid; (4) for Class I wells, source and analysis of the chemical, physical, radiological and biological characteristics, including density and corrosiveness, of injection fluids; (5) for Class II wells, source and analysis of the physical and chemical characteristics of the injection fluid; (6) for Class III wells, a qualitative analysis and ranges in concentrations of all constituents of injected fluids. If the information is proprietary, maximum concentrations only may be submitted, but all records must be retained.

I. **FORMATION TESTING PROGRAM** - Describe the proposed formation testing program. For Class I wells the program must be designed to obtain data on fluid pressure, temperature, fracture pressure, other physical, chemical, and radiological characteristics of the injection matrix and physical and chemical characteristics of the formation fluids.

For Class II wells the testing program must be designed to obtain data on fluid pressure, estimated fracture pressure, physical and chemical characteristics of the injection zone. (Does not apply to existing Class II wells or projects.)

For Class III wells the testing must be designed to obtain data on fluid pressure, fracture pressure, and physical and chemical characteristics of the formation fluids if the formation is naturally water bearing. Only fracture pressure is required if the program formation is not water bearing. (Does not apply to existing Class III wells or projects.)

J. **STIMULATION PROGRAM** - Outline any proposed stimulation program.

K. **INJECTION PROCEDURES** - Describe the proposed injection procedures including pump, surge, tank, etc.

L. **CONSTRUCTION PROCEDURES** - Discuss the construction procedures (according to §146.12 for Class I, §146.22 for Class II, and §146.32 for Class III) to be utilized. This should include details of the casing and cementing program, logging procedures, deviation checks, and the drilling, testing and coring program, and proposed annulus fluid. (Request and submission of justifying data must be made to use an alternative to packer for Class I.)

M. **CONSTRUCTION DETAILS** - Submit schematic or other appropriate drawings of the surface and subsurface construction details of the well.

N. **CHANGES IN INJECTED FLUID** - Discuss expected changes in pressure, native fluid displacement, and direction of movement of injection fluid. (Class III wells only.)

O. **PLANS FOR WELL FAILURES** - Outline contingency plans (proposed plans, if any, for Class II) to cope with all shut-ins or wells failures, so as to prevent migration of fluids into any USDW.

P. **MONITORING PROGRAM** - Discuss the planned monitoring program. This should be thorough, including maps showing the number and location of monitoring wells as appropriate and discussion of monitoring devices, sampling frequency, and parameters measured. If a manifold monitoring program is utilized, pursuant to §146.23(b)(5), describe the program and compare it to individual well monitoring.

Q. **PLUGGING AND ABANDONMENT PLAN** - Submit a plan for plugging and abandonment of the well including: (1) describe the type, number, and placement (including the elevation of the top and bottom) of plugs to be used; (2) describe the type, grade, and quantity of cement to be used; and (3) describe the method to be used to place plugs, including the method used to place the well in a state of static equilibrium prior to placement of the plugs. Also for a Class III well that underlies or is in an exempted aquifer, demonstrate adequate protection of USDWs. Submit this information on EPA Form 7520-14, Plugging and Abandonment Plan.

R. **NECESSARY RESOURCES** - Submit evidence such as a surety bond or financial statement to verify that the resources necessary to close, plug or abandon the well are available.

S. **AQUIFER EXEMPTIONS** - If an aquifer exemption is requested, submit data necessary to demonstrate that the aquifer meets the following criteria: (1) does not serve as a source of drinking water; (2) cannot now and will not in the future serve as a source of drinking water; and (3) the TDS content of the ground water is more than 3,000 and less than 10,000 mg/l and is not reasonably expected to supply a public water system. Data to demonstrate that the aquifer is expected to be mineral or hydrocarbon production, such as general description of the mining zone, analysis of the amenability of the mining zone to the proposed method, and time table for proposed development must also be included. For additional information on aquifer exemptions, see 40 CFR Sections 144.7 and 146.04.

T. **EXISTING EPA PERMITS** - List program and permit number of any existing EPA permits, for example, NPDES, PSD, RCRA, etc.

U. **DESCRIPTION OF BUSINESS** - Give a brief description of the nature of the business.

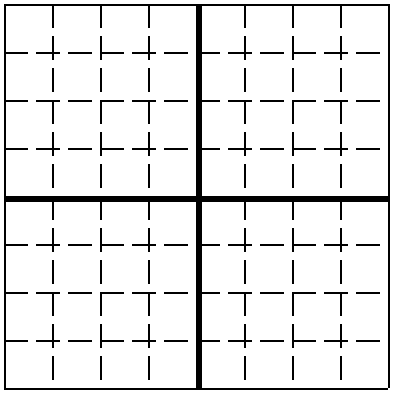
OMB No. 2040-0042 Approval Expires 1/31/05

United States Environmental Protection Agency
Washington, DC 20460

Application To Transfer Permit

Name and Address of Existing Permittee	Name and Address of Surface Owner

Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number

Surface Location Description

____ 1/4 of ____ 1/4 of ____ 1/4 of ____ 1/4 of Section ____ Township ____ Range ____

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface
Location ____ ft. frm (N/S) ____ Line of quarter section
and ____ ft. from (E/W) ____ Line of quarter section.

Well Activity	Well Status	Type of Permit
____ Class I	____ Operating	____ Individual
____ Class II	____ Modification/Conversion	____ Area
____ Brine Disposal	____ Proposed	Number of Wells ____
____ Enhanced Recovery		
____ Hydrocarbon Storage		
____ Class III		
____ Other		

Lease Number Well Number

Name(s) and Address(es) of New Owner(s)	Name and Address of New Operator

Attach to this application a written agreement between the existing and new permittee containing a specific date for transfer of permit responsibility, coverage, and liability betweend them.

The new permittee must show evidence of financial responsibility by the submission of a surety bond, or other adequate assurance, such as financial statements or other materials acceptable to the Director.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR 144.32)

Name and Official Title *(Please type or print)*	Signature	Date Signed

PAPERWORK REDUCTION ACT

The public reporting and record keeping burden for this collection of information is estimated to average 5 hours per response. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.

Well Class and Type Code

Class I	Wells used to inject waste below the deepest underground source of drinking water.
Type "I"	Nonhazardous industrial disposal well
"M"	Nonhazardous municipal disposal well
"W"	Hazardous waste disposal well injecting below USDWs
"X"	Other Class I wells (not included in Type "I," "M," or "W")
Class II	Oil and gas production and storage related injection wells.
Type "D"	Produced fluid disposal well
"R"	Enhanced recovery well
"H"	Hydrocarbon storage well (excluding natural gas)
"X"	Other Class II wells (not included in Type "D," "R," or "H")
Class III	Special process injection wells.
Type "G"	Solution mining well
"S"	Sulfur mining well by Frasch process
"U"	Uranium mining well
"X"	Other Class III wells (not included in Type "G," "S," or "U")
Other Classes	Wells not included in classes above. Class V wells which may be permitted under § 144.12 Wells not currently classified as Class I, II, III, or V

OMB No. 2040-0042 Approval Expires 1/31/05

United States Environmental Protection Agency
Washington, DC 20460

Injection Well Monitoring Report

Year	Month	Month	Month
Injection Pressure (PSI)			
1. Minimum			
2. Average			
3. Maximum			
Injection Rate (Gal/Min)			
1. Minimum			
2. Average			
3. Maximum			
Annular Pressure (PSI)			
1. Minimum			
2. Average			
3. Maximum			
Injection Volume (Gal)			
1. Monthly Total			
2. Yearly Cumulative			
Temperature (F °)			
1. Minimum			
2. Average			
3. Maximum			
pH			
1. Minimum			
2. Average			
3. Maximum			
Other			

Name and Address of Permittee		Permit Number
Name and Official Title *(Please type or print)*	Signature	Date Signed

EPA Form 7520-8 (Rev. 8-01)

Paperwork Reduction Act

The public reporting and record keeping burden for this collection of information is estimated to average 5.7 hours per year for operators of Class I wells and 30 hours per quarter for operators of Class III wells. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.

OMB No. 2040-0042 Approval Expires 1/31/05

United States Environmental Protection Agency
Washington, DC 20460

Completion Form For Injection Wells

Administrative Information

1. Permittee

Address ***(Permanent Mailing Address) (Street, City, and ZIP Code)***

2. Operator

Address ***(Street, City, State and ZIP Code)***

3. Facility Name	**Telephone Number**

Address ***(Street, City, State and ZIP Code)***

4. Surface Location Description of Injection Well(s)

State	**County**

Surface Location Description

____ 1/4 of ____ 1/4 of ____ 1/4 of ____ 1/4 of Section ____ Township ____ Range ____

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface
Location ____ ft. frm (N/S) ____ Line of quarter section
and ____ ft. from (E/W) ____ Line of quarter section.

Well Activity

____ Class I
____ Class II
- ____ Brine Disposal
- ____ Enhanced Recovery
- ____ Hydrocarbon Storage

____ Class III
____ Other

Well Status

____ Operating
____ Modification/Conversion
____ Proposed

Type of Permit

____ Individual
____ Area : Number of Wells ____

Lease Number _____ **Well Number** _____

Submit with this Completion Form the attachments listed in Attachments for Completion Form.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR 144.32)

Name and Official Title ***(Please type or print)***	**Signature**	**Date Signed**

Attachments to be submitted with the Completion report:

I. Geologic Information

1. Lithology and Stratigraphy

A. Provide a geologic description of the rock units penetrated by name, age, depth, thickness, and lithology of each rock unit penetrated.

B. Provide a description of the injection unit.

(1) Name
(2) Depth (drilled)
(3) Thickness
(4) Formation fluid pressure
(5) Age of unit
(6) Porosity (avg.)
(7) Permeability
(8) Bottom hole temperature
(9) Lithology
(10) Bottom hold pressure
(11) Fracture pressure

C. Provide chemical characteristics of formation fluid (attach chemical analysis).

D. Provide a description of freshwater aquifers.

(1) Depth to base of fresh water (less than 10,000 mg/l TDS).
(2) Provide a geologic description of aquifer units with name, age, depth, thickness, lithology, and average total dissolved solids.

II. Well Design and Construction

1. Provide data on surface, intermediate, and long string casing and tubing. Data must include material, size, weight, grade, and depth set.

2. Provide data on the well cement, such as type/class, additives, amount, and method of emplacement.

3. Provide packer data on the packer (if used) such as type, name and model, setting depth, and type of annular fluid used.

4. Provide data on centralizers to include number, type and depth.

5. Provide data on bottom hole completions.

6. Provide data on well stimulation used.

III. Description of Surface Equipment

1. Provide data and a sketch of holding tanks, flow lines, filters, and injection pump.

IV. Monitoring Systems

1. Provide data on recording and nonrecording injection pressure gauges, casing-tubing annulus pressure gauges, injection rate meters, temperature meters, and other meters or gauges.

2. Provide data on constructed monitor wells such as location, depth, casing diameter, method of cementing, etc.

V. Logging and Testing Results

Provide a descriptive report interpreting the results of geophysical logs and other tests. Include a description and data on deviation checks run during drilling.

VI. Provide an as-built diagrammatic sketch of the injection well(s) showing casing, cement, tubing, packer, etc., with proper setting depths. The sketch should include well head and gauges.

VII. Provide data demonstrating mechanical integrity pursuant to 40 CFR 146.08.

VIII. Report on the compatibility of injected wastes with fluids and minerals in both the injection zone and the confining zone.

IX. Report the status of corrective action on defective wells in the area of review.

X. Include the anticipated maximum pressure and flow rate at which injection will operate.

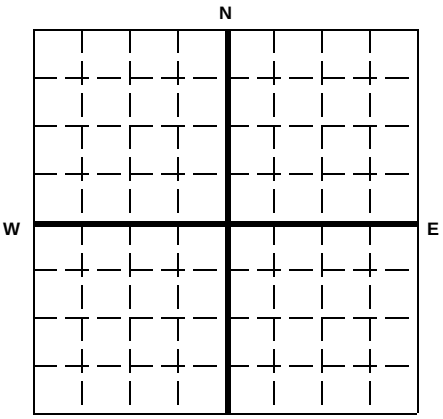
OMB No. 2040-0042 Approval Expires 1/31/05

United States Environmental Protection Agency
Washington, DC 20460

COMPLETION REPORT FOR BRINE DISPOSAL, HYDROCARBON STORAGE, OR ENHANCED RECOVERY

Name and Address of Existing Permittee	Name and Address of Surface Owner

Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number

Surface Location Description

____ 1/4 of ____ 1/4 of ____ 1/4 of ____ 1/4 of Section ____ Township ____ Range ____

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location ____ ft. frm (N/S) ____ Line of quarter section and ____ ft. from (E/W) ____ Line of quarter section.

WELL ACTIVITY

- ☐ Brine Disposal
- ☐ Enhanced Recovery
- ☐ Hydrocarbon Storage

TYPE OF PERMIT

- ☐ Individual
- ☐ Area

Number of Wells ____

Estimated Fracture Pressure of Injection Zone

Anticipated Daily Injection Volume (Bbls)		Injection Interval	
Average	Maximum	Feet	to Feet

Anticipated Daily Injection Pressure (PSI)		Depth to Bottom of Lowermost Freshwater Formation (Feet)
Average	Maximum	

Type of Injection Fluid *(Check the appropriate block(s))*

- ☐ Salt Water
- ☐ Brackish Water
- ☐ Fresh Water
- ☐ Liquid Hydrocarbon
- ☐ Other

Lease Name	Well Number

Name of Injection Zone

Date Drilling Began	Date Well Completed

Permeability of Injection Zone

Date Drilling Completed

Porosity of Injection Zone

CASING AND TUBING			CEMENT		HOLE	
OD Size	Wt/Ft - Grade - New or Used	Depth	Sacks	Class	Depth	Bit Diameter

INJECTION ZONE STIMULATION		WIRE LINE LOGS, LIST EACH TYPE	
Interval Treated	Materials and Amount Used	Log Types	Logged Intervals

Complete Attachments A -- E listed on the reverse.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibliity of fine and imprisonment. (Ref. 40 CFR 144.32)

Name and Official Title *(Please type or print)*	Signature	Date Signed

ATTACHMENTS

A. Present a schematic or other appropriate drawing of the surface and subsurface construction details of the well as built.

B. Describe the method and results of mechanical integrity testing.

C. Present the results of that portion of those logs, test, and cores which specifically relate to (1) underground sources of drinking water and the confining zone(s) and (2) the injection and adjacent formations.

D. Present the status of corrective action on defective wells in the area of review.

E. Provide to EPA, with the completion report, one final print of all geophysical logs run.

PAPERWORK REDUCTION ACT

The public reporting and record keeping burden for this collection of information is estimated to average 4 hours per well. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.

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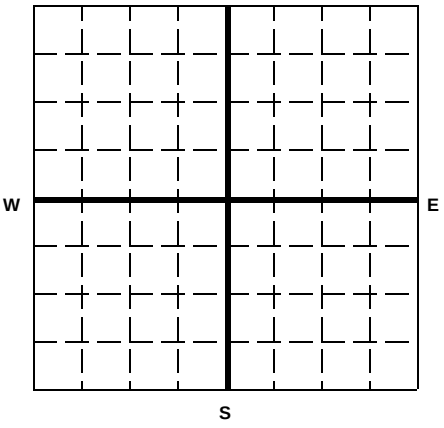
United States Environmental Protection Agency
Washington, DC 20460

ANNUAL DISPOSAL/INJECTION WELL MONITORING REPORT

Name and Address of Existing Permittee	Name and Address of Surface Owner

Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number

Surface Location Description

____ 1/4 of ____ 1/4 of ____ 1/4 of ____ 1/4 of Section ____ Township ____ Range ____

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location ____ ft. frm (N/S) ____ Line of quarter section and ____ ft. from (E/W) ____ Line of quarter section.

WELL ACTIVITY

- ☐ Brine Disposal
- ☐ Enhanced Recovery
- ☐ Hydrocarbon Storage

TYPE OF PERMIT

- ☐ Individual
- ☐ Area

Number of Wells ____

Lease Name Well Number

	INJECTION PRESSURE		TOTAL VOLUME INJECTED		TUBING -- CASING ANNULUS PRESSURE (OPTIONAL MONITORING)	
MONTH YEAR	AVERAGE PSIG	MAXIMUM PSIG	BBL	MCF	MINIMUM PSIG	MAXIMUM PSIG

Certification

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Name and Official Title *(Please type or print)*	Signature	Date Signed

PAPERWORK REDUCTION ACT

The public reporting and record keeping burden for this collection of information is estimated to average 25 hours annually for operators of Class I wells and 5 hours annually for operators of Class II wells. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.

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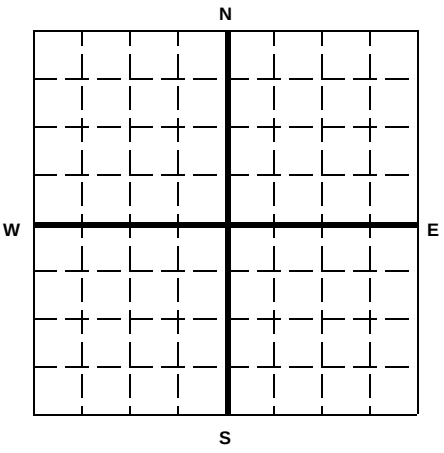
United States Environmental Protection Agency
Washington, DC 20460

WELL REWORK RECORD

Name and Address of Permittee	Name and Address of Contractor

Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number

Surface Location Description

____ 1/4 of ____ 1/4 of ____ 1/4 of ____ 1/4 of Section ____ Township ____ Range ____

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface Location ____ ft. frm (N/S) ____ Line of quarter section and ____ ft. from (E/W) ____ Line of quarter section.

WELL ACTIVITY	Total Depth Before Rework	TYPE OF PERMIT
☐ Brine Disposal ☐ Enhanced Recovery ☐ Hydrocarbon Storage	Total Depth After Rework	☐ Individual ☐ Area Number of Wells ____
Lease Name	Date Rework Commenced	Well Number
	Date Rework Completed	

WELL CASING RECORD -- BEFORE REWORK

Casing		Cement		Perforations		Acid or Fracture Treatment Record
Size	Depth	Sacks	Type	From	To	

WELL CASING RECORD -- AFTER REWORK *(Indicate Additions and Changes Only)*

Casing		Cement		Perforations		Acid or Fracture Treatment Record
Size	Depth	Sacks	Type	From	To	

DESCRIBE REWORK OPERATIONS IN DETAIL USE ADDITIONAL SHEETS IF NECESSARY	WIRE LINE LOGS, LIST EACH TYPE	
	Log Types	Logged Intervals

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibliity of fine and imprisonment. (Ref. 40 CFR 144.32)

Name and Official Title *(Please type or print)*	Signature	Date Signed

PAPERWORK REDUCTION ACT

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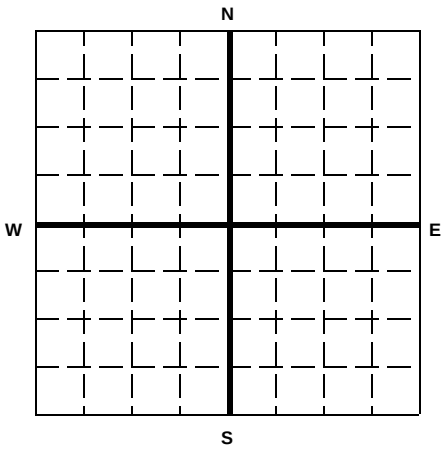
OMB No. 2040-0042 Approval Expires 1/31/05

United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility	Name and Address of Owner/Operator

Locate Well and Outline Unit on Section Plat - 640 Acres



State	County	Permit Number

Surface Location Description

____ 1/4 of ____ 1/4 of ____ 1/4 of ____ 1/4 of Section ____ Township ____ Range ____

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface

Location ____ ft. frm (N/S) ____ Line of quarter section

and ____ ft. from (E/W) ____ Line of quarter section.

TYPE OF AUTHORIZATION

- ☐ Individual Permit
- ☐ Area Permit
- ☐ Rule

Number of Wells ____

Lease Name

WELL ACTIVITY

- ☐ CLASS I
- ☐ CLASS II
  - ☐ Brine Disposal
  - ☐ Enhanced Recovery
  - ☐ Hydrocarbon Storage
- ☐ CLASS III

Well Number

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE

METHOD OF EMPLACEMENT OF CEMENT PLUGS

- ☐ The Balance Method
- ☐ The Dump Bailer Method
- ☐ The Two-Plug Method
- ☐ Other

CEMENTING TO PLUG AND ABANDON DATA:	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inche							
Depth to Bottom of Tubing or Drill Pipe (ft							
Sacks of Cement To Be Used (each plug)							
Slurry Volume To Be Pumped (cu. ft.)							
Calculated Top of Plug (ft.)							
Measured Top of Plug (if tagged ft.)							
Slurry Wt. (Lb./Gal.)							
Type Cement or Other Material (Class III)							

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To

Estimated Cost to Plug Wells

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibliity of fine and imprisonment. (Ref. 40 CFR 144.32)

Name and Official Title *(Please type or print)*	Signature	Date Signed

Paperwork Reduction Act Notice

The public reporting and record keeping burden for this collection of information is estimated to average 19.5 hours annually for operators of Class I wells, 6 hours annually for operators of Class II wells, and 8 hours annually for operators of Class III wells. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15.

Please send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Office of Environmental Information, Collection Strategies Division, U.S. Environmental Protection Agency (2822), Ariel Rios Building, 1200 Pennsylvania Ave., NW., Washington, DC 20460; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW., Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA ICR number and OMB control number in any correspondence.

Type or print all information. See reverse for instructions.

OMB No. 2040-0042 Approval Expires 1/31/05

INVENTORY OF INJECTION WELLS

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF GROUND WATER AND DRINKING WATER

(This information is collected under the authority of the Safe Drinking Water Act)

1. DATE PREPARED *(Year, Month, Day)* — YR / MO / DY

2. FACILITY ID NUMBER

PAPERWORK REDUCTION ACT NOTICE

The public reporting burden for this collection of information is estimated at about 0.5 hour per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Chief, Information Policy Branch, 2136, U.S. Environmental Protection Agency, 401 M Street, SW, Washington, DC 20460, and to the Office of Management and Budget, Paperwork Reduction Project, Washington, DC 20503.

3. TRANSACTION TYPE *(Please mark one of the following)*

- ☐ Deletion
- ☐ First Time Entry
- ☐ Entry Change
- ☐ Replacement

4. FACILITY NAME AND LOCATION

A. NAME *(last, first, and middle initial)*

B. STREET ADDRESS/ROUTE NUMBER

C. LATITUDE — DEG / MIN / SEC .

D. LONGITUDE — DEG / MIN / SEC .

E. TOWNSHIP/RANGE — TOWNSHIP / RANGE / SECT / 1/4 SECT

F. CITY/TOWN

G. STATE

H. ZIP CODE

I. NUMERIC COUNTY CODE

J. INDIAN LAND *(mark "x")* ☐ Yes ☐ No

5. LEGAL CONTACT:

A. TYPE *(mark "x")* ☐ Owner ☐ Operator

B. NAME *(last, first, and middle initial)*

C. PHONE *(area code and number)*

D. ORGANIZATION

E. STREET/P.O. BOX

F. CITY/TOWN

G. STATE

H. ZIP CODE

I. OWNERSHIP *(mark "x")*

- ☐ PRIVATE
- ☐ PUBLIC
- ☐ SPECIFY OTHER _____
- ☐ STATE
- ☐ FEDERAL

6. WELL INFORMATION:

A. CLASS AND TYPE		B. NUMBER OF WELLS		C. TOTAL NUMBER OF WELLS	D. WELL OPERATION STATUS				
		COMM	NON-COMM		UC	AC	TA	PA	AN

COMMENTS *(Optional):*

KEY:

DEG = Degree
MIN = Minute
SEC = Second

SECT = Section
1/4 SECT = Quarter Section

COMM = Commercial
NON-COMM = Non-Commercial

AC = Active
UC = Under Construction
TA = Temporarily Abandoned
PA = Permanently Abandoned and Approved by State
AN = Permanently Abandoned and not Approved by State

SECTION 1. DATE PREPARED: Enter date in order of year, month, and day.

SECTION 2. FACILITY ID NUMBER: In the first two spaces, insert the appropriate U.S. Postal Service State Code. In the third space, insert one of the following one letter alphabetic identifiers:

D - DUNS Number,
G - GSA Number, or
S - State Facility Number.

In the remaining spaces, insert the appropriate nine digit DUNS, GSA, or State Facility Number. For example, A Federal facility (GSA - 123456789) located in Virginia would be entered as : VAG123456789.

SECTION 3. TRANSACTION TYPE: Place an "x" in the applicable box. See below for further instructions.

Deletion. Fill in the Facility ID Number.
First Time Entry. Fill in all the appropriate information.
Entry Change. Fill in the Facility ID Number and the information that has changed.
Replacement.

SECTION 4. FACILITY NAME AND LOCATION:

A. Name. Fill in the facility's official or legal name.
B. Street Address. Self Explanatory.
C. Latitude. Enter the facility's latitude (all latitudes assume North Except for American Samoa).
D. Longitude. Enter the facility's longitude (all longitudes assume West except Guam).
E. Township/Range. Fill in the complete township and range. The first 3 spaces are numerical and the fourth is a letter (N,S,E,W) specifying a compass direction. A township is North or South of the baseline, and a range is East or West of the principal meridian (e.g., 132N, 343W).
F. City/Town. Self Explanatory.
G. State. Insert the U.S. Postal Service State abbreviation.
H. Zip Code. Insert the five digit zip code plus any extension.

SECTION 4. FACILITY NAME & LOCATION (CONT'D.):

I. Numeric County Code. Insert the numeric county code from the Federal Information Processing Standards Publication (FIPS Pub 6-1) June 15, 1970, U.S. Department of Commerce, National Bureau of Standards. For Alaska, use the Census Division Code developed by the U.S. Census Bureau.
J. Indian Land. Mark an "x" in the appropriate box (Yes or No) to indicate if the facility is located on Indian land.

SECTION 5. LEGAL CONTACT:

A. Type. Mark an "x" in the appropriate box to indicate the type of legal contact (Owner or Operator). For wells operated by lease, the operator is the legal contact.
B. Name. Self Explanatory.
C. Phone. Self Explanatory.
D. Organization. If the legal contact is an individual, give the name of the business organization to expedite mail distribution.
E. Street/P.O. Box. Self Explanatory.
F. City/Town. Self Explanatory.
G. State. Insert the U.S. Postal Service State abbreviation.
H. Zip Code. Insert the five digit zip code plus any extension.
I. Ownership. Place an "x" in the appropriate box to indicate ownership status.

SECTION 6. WELL INFORMATION:

A. Class and Type. Fill in the Class and Type of injection wells located at the listed facility. Use the most pertinent code (specified below) to accurately describe each type of injection well. For example, 2R for a Class II Enhanced Recovery Well, or 3M for a Class III Solution Mining Well, etc.
B. Number of Commercial and Non-Commercial Wells. Enter the total number of commercial and non-commercial wells for each Class/Type, as applicable.
C. Total Number of Wells. Enter the total number of injection wells for each specified Class/Type.
D. Well Operation Status. Enter the number of wells for each Class/Type under each operation status (see key on other side).

CLASS I Industrial, Municipal, and Radioactive Waste Disposal Wells used to inject waste below the lowermost Underground Source of Drinking Water (USDW).

TYPE		
	1I	Non-Hazardous Industrial Disposal Well.
	1M	Non-Hazardous Municipal Disposal Well.
	1H	Hazardous Waste Disposal Well injecting below the lowermost USDW.
	1R	Radioactive Waste Disposal Well.
	1X	Other Class I Wells.

CLASS II Oil and Gas Production and Storage Related Injection Wells.

TYPE		
	2A	Annular Disposal Well.
	2D	Produced Fluid Disposal Well.
	2H	Hydrocarbon Storage Well.
	2R	Enhanced Recovery Well.
	2X	Other Class II Wells.

CLASS III Special Process Injection Wells.

TYPE		
	3G	*In Situ* Gassification Well
	3M	Solution Mining Well.

CLASS III (CONT'D.)

TYPE		
	3S	Sulfur Mining Well by Frasch Process.
	3T	Geothermal Well.
	3U	Uranium Mining Well.
	3X	Other Class III Wells.

CLASS IV Wells that inject hazardous waste into/above USDWs.

TYPE		
	4H	Hazardous Facility Injection Well.
	4R	Remediation Well at RCRA or CERCLA site.

CLASS V Any Underground Injection Well not included in Classes I through IV.

TYPE		
	5A	Industrial Well.
	5B	Beneficial Use Well.
	5C	Fluid Return Well.
	5D	Sewage Treatment Effluent Well.
	5E	Cesspools (non-domestic).
	5F	Septic Systems.
	5G	Experimental Technology Well.
	5H	Drainage Well.
	5I	Mine Backfill Well.
	5J	Waste Discharge Well.

PAPERWORK REDUCTION ACT The public reporting and record keeping burden for this collection of information is estimated to average 0.5 hours per response. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.

United States Environmental Protection Agency

UIC Federal Reporting System

Class V Well Pre-Closure Notification Form

1. **Name of facility:** _____

   Address of facility: _____

   _____

   City/Town: _____ **State:** _____ **Zip Code:** _____

   County: _____ **Location:** _____ **Lat./Long.:** _____

2. **Name of Owner/Operator:** _____

   Address of Owner/Operator: _____

   _____

   City/Town: _____ **State:** _____ **Zip Code:** _____

   Legal contact: _____ **Phone number:** _____

3. **Type of well(s):** _____ **Number of well(s):** _____

4. **Well construction (check all that apply):**

☐ **Drywell** ☐ **Septic tank** ☐ **Cesspool**

☐ **Improved sinkhole** ☐ **Drainfield/leachfield** ☐ **Other**

5. **Type of discharge:** _____

   _____

6. **Average flow (gallons/day):** _____ 7. **Year of well construction:** _____

8. **Type of well closure (check all that apply):**

☐ **Sample fluids/sediments** ☐ **Clean out well**

☐ **Appropiate disposal of remaining fluids/sediments** ☐ **Install permanent plug**

☐ **Remove well & any contaminated soil** ☐ **Conversion to other well type**

☐ **Other (describe):** _____

9. **Proposed date of well closure:** _____

10. **Name of preparer:** _____ **Date:** _____

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR 144.32).

Name and Official Title (*Please type or print*)	Signature	Date Signed

INSTRUCTIONS FOR EPA FORM 7520-17

This form contains the minimum information that you must provide your UIC Program Director if you intend to close your Class V well. This form will be used exclusively where the EPA administers the UIC Program: AK, AS, AZ, CA, CO, DC, DE, HI, IA, IN, KY, MI, MN, MT, NY, PA, SD, TN, VA, VI, and on all Tribal Lands. If you are located in a different State or jurisdiction, ask the agency that administers the UIC Program in your State for the appropriate form.

If you are closing two or more Class V wells that are of similar construction at your facility (two dry wells, for example) you may use one form. If you are closing Class V wells of different construction (a septic system and a dry well, for example) use one form per construction type.

The numbers below correspond to the numbers on the form.

1. **Supply the name and street address of the facility where the Class V well(s) is located. Include the City/Town, State (U.S. Postal Service abbreviation) and Zip Code. If there is no street address for the Class V well, provide the route number or locate the well(s) on a map and attach it to this form. Under "Location," provide the Latitude/Longitude of the well, if available.**

2. **Provide the name and mailing address of the owner of the facility, or if the facility is operated by lease, the operator of the facility. Include the name and phone number of the legal contact for any questions regarding the information provided on this form.**

3. **Indicate the type of Class V well that you intend to close (for example, motor vehicle waste disposal well or cesspool). Provide the number of wells of this well type at your location that will be closed.**

4. **Mark an "X" in the appropriate box to indicate the type of well construction. Mark all that apply to your situation. For example, for a septic tank that drains into a drywell, mark both the "septic tank" and "drywell" boxes. Please provide a generalized sketch or schematic of the well construction if available.**

5. **List or describe the types of fluids that enter the Class V well. If available, attach a copy of the chemical analysis results and/or the Material Safety Data Sheets for the fluids that enter the well.**

6. **Estimate the average daily flow into the well in gallons per day.**

7. **Provide the year that the Class V well was constructed. If unknown, provide the length of time that your business has been at this location and used this well.**

8. **Mark an "X" in the appropriate box(s) to indicate briefly how the well closure is expected to proceed. Mark all that apply to your situation. For example, all boxes except the "Remove well & any contaminated soil" and "Other" would be marked if: the connection of an automotive service bay drain leading to a septic tank and drainfield will be closed, but the septic system will continue to be used for washroom waste disposal only, and the fluids and sludge throughout the system will be removed for proper disposal, the system cleaned, a cement plug placed in the service bay drain and the pipe leading to the washroom connection, and the septic tank/drainfield remains open for septic use only. In this example, the motor vehicle waste disposal well is being converted to another well type (a large capacity septic system).**

9. **Self explanatory.**

10. **Self explanatory.**

PLEASE READ . . .

The purpose of this form is to serve as the means for the Class V well owner or operator's notice to the UIC Director of his/her intent to close the well in accordance with Title 40 of the Code of Federal Regulations (40 CFR) Section 144.12(a). According to 40 CFR §144.86, you must notify the UIC Program Director at least 30 days prior to well closure of your intent to close and abandon your well. Upon receipt of this form, if the Director determines that more specific information is required to be submitted to ensure that the well closure will be conducted in a manner that will protect underground sources of drinking water (as defined in 40 CFR §144.3), the Director can require the owner/operator to prepare, submit and comply with a closure plan acceptable to, and approved by the Director.

Please be advised that this form is intended to satisfy Federal UIC requirements regarding pre-closure notification only. Other State, Tribal or Local requirements may also apply.

Paper Work Reduction Act Notice

The public reporting and record keeping burden for this collection of information is estimated to average 1.5 hours per respondent. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions, develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information, adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including thorough the use of automated collection techniques to the Director, Regulatory information Division, U.S. Environmental Protection Agency (2137), 401 M. Street, S.W., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed form to this address.

Appendix F: Progress Report on OMB's Terms of Clearance Dated (October 25, 2005)

Underground Injection Control Program Information Collection Request

OMB # 2040-0042

EPA # 0370.21

Attachment to Supporting Statement

Introduction

This progress report provides specific answers to OMB's "Terms of Clearance" concerns raised in two emails to EPA's Office of Ground Water and Drinking Water (OGWDW) for the Underground Injection Control (UIC) Program ICR. In a late September 2005, email, the ICR was given a 2-year clearance. However in a sequent email dated October 25, 2007, OMB reduced the clearance to 18 months. This report will also briefly highlight efforts being explored to reduce UIC Program burden, a key OMB concern.

OMB Comments/Concerns and UIC Program Responses

OMB does not believe that concerns raised in the terms of clearance have been adequately addressed. OMB requested that before the UIC program began preparation of the next renewal of this ICR, the Agency shall orally brief OMB on its progress to date on addressing the issues outlined in the terms of clearance. Management and staff have briefed and discussed orally the issues with OMB's representative, Jim Laity. Furthermore, through cooperative early involvement, Program management and staff sent a draft first ICR Federal Register Notice and a Burden Reduction report to OMB for review. OMB reviewed these drafts and on January 19, 2007, OMB's representative sent an email to EPA showing a favorable response. The first Federal Register Notice was published on February 28, 2007. Both the Notice and report was placed in the Agency's docket for public comment and review. No comments were received on either document. The Program has been steadily working with UIC regional programs to study areas where burden reduction might be possible. This also included a review of state burden activities. The Agency will be working diligently throughout the remainder of the calendar year to find and implement, where possible, Program areas for burden reduction. Below, the Agency addresses four areas of concern from OMB:

OMB Concern #1

Following the Agency's effort to develop a National Source Contamination Prevention Strategy (designed to focus reporting in the Program on a few meaningful measures) modification of the 7520 forms was to be completed. EPA did not report to OMB on the progress of this effort.

EPA Response:
The National Source Water Contamination Prevention Strategy was designed to measure program performance. The Strategy focused reporting on a few meaningful measures for both the Source Water Protection (SWP) and the Underground Injection Control (UIC) programs. A comprehensive strategy for the SWP and UIC programs was necessary to help accomplish the Agency's strategic goals of environmental protection. Management felt that at the time of its development, it would replace the 7520 Federal Reporting forms.

In early 2000, EPA's OGWDW's Drinking Water Protection Division began planning the development of a national drinking water contamination prevention strategy. Federal statutes and state laws exist to safeguard public health through the protection of drinking water supplies from contamination which is also called Source Water Protection. There was no national statute, regulation, or guidance document that clearly defined what source water protection was, how it should be implemented, and how to measure performance, therefore the "National Source Water Contamination Prevention Strategy" was proposed. This strategic document development became cumbersome and difficult to implement. As a result, the effort to develop the national strategy evolved into two separate efforts. One was a measures document for the SWP program and the other was a measures document for the UIC program. Dividing the effort into two separate strategies allowed EPA to timely complete a few meaningful measures for both programs. The measures were distributed to the Regions through two separate measures documents, "State and Federal Source Water Assessment and Protection Program Measures – Final Reporting Guidance" and "Information to Assist Regions and States to Report on the Underground Injection Control (UIC) Program's National Water Program Guidance Program Activity Measures".

The process started through the strategy resulted in four measures for each program. The intent of the measures was to help EPA better understand program performance by creating measures that support the program priorities.

These performance measures provide a good picture of the program's current priorities but do not provide comprehensive enough data to manage a national program. However, the information on the 7520s does provide the data necessary to manage a national program. Currently, the information necessary to perform effective program management is captured in the 7520 summary paper forms (1, 2A, 2B, 3 and 4). Therefore, the 7520 information can not be replaced by only a few meaningful measures and still ensure public health protection.

To help reduce the burden on primacy states, EPA is developing a more efficient data collection method, a database. The national data system will contain the information that is critical to program management. The data contained in the data system represents the data necessary to ensure public health protection. When developing the data system, EPA evaluated the products of the revised 7520 workgroup, which was finalized in 2001. The revised forms were part of the decision-making process when determining what the database will contain. The revised 7520 forms enjoyed both state and EPA Regional support. Recognizing the contribution that the Agency-state workgroup made, with this in mind, the database will contain only the data necessary for program management.

OMB Concern #2
OMB believes that the Program has lost its focus on ensuring that all data have practical utility and that burden is reduced to the extent practical and appropriate (both of which are required by 5 CFR 1320.9).

EPA Response:
EPA has evaluated the need for the collected data through the database development process and the ICR renewal. When developing the database, EPA wanted to ensure that all of the data collected was necessary for program management. EPA reviewed the recommendations from the 7520 workgroup, consulted with EPA regions and states, checked the authority to collect the data and evaluated how EPA uses that information. The result of this effort is a database that will meet the needs of the UIC program to manage the program. EPA feels that the data to be collected through the database is critical to ensure public health protection by holding accountable implementing programs.

During the ICR renewal we reviewed all UIC data collected and determined the necessity of the information. Primacy programs were consulted to determine the use of information submitted by the owners and operators. EPA regions were also involved to review the necessity of the information submitted to EPA by primacy agencies.

OMB Concern #3
There has been no modification to the 7520 Forms, and no other actions to reduce burden since FY 1996, when EPA reduced the **frequency** of some reporting requirements. There appears to have been no follow up on recommended changes by the Federal Reporting Forms Workgroup. While a new Excel Spreadsheet reporting process has been added to track four new Performance Activity Measures (PAMs), none of the existing reporting requirements have been eliminated or reduced. The annual burden of this report has increased by 22%. While the agency has characterized this increase as an adjustment, OMB notes that 127,843 hours reflects new permitting and closure requirements for operations of certain Class V wells, and has reclassified this burden.

EPA Response:
EPA has taken no action to modify the 7520 forms because EPA decided to use an alternative approach to streamlining reporting, developing a database.

Previously, EPA reduced the frequency of reporting to the extent possible without sacrificing the intent or implementation of the program; EPA has further evaluated the burden imposed on states and determined the following conclusions:

- EPA previously reduced as much burden as possible without a regulatory change
- The data collected by the 7520s is critical to perform program management

EPA has taken action to consolidate reporting during the development of the national database. When the database is complete, it will be the mechanism for UIC reporting. This was

accomplished by consolidating measures and inventory reporting through web-entry. EPA is also evaluating other ways to simplify reporting.

The 22% increase in the last ICR renewal was characterized as an adjustment because this increase was not due to new reporting requirements but additional respondents and increase activity to close and/or permit certain high-priority Class V wells and increases in required Class II operations that must be preformed by the operators (consultations).

Change in Annual Respondent Burden Hours

Respondent type	Previous Respondent Burden	Revised Respondent Burden	Net Change	Reason of Change (adjustments)
Class-II operators	589,384	803,422	214,038	Large increase in operations that must be performed based on consultations
Class-IV operators	3,700	9,900	6,200	A higher number of Class IV wells to be closed during the clearance period
Class-V Operators	39,259	167,102	127,843	Significant increase in activities related to the 1999 Class V Rule
UIC-Primacy Agencies	78,412	82,892	4,480	Increase in burden during clearance period but < 6 percent
Total	710,755	1,063,316	352,561	

OMB Concern #4
OMB is instructing the Program during the next year, prior to beginning the renewal process for this ICR, to review the recommendations of the Federal Reporting Forms workgroup and determine whether these or other changes to the forms, with the specific goal of reducing unnecessary burden, are appropriate. EPA needs to provide OMB a full report on how it has addressed each of the specific recommendations of the Federal Reporting Forms workgroup.

EPA Response:
EPA has reviewed the revised 7520s through the development of a national database. EPA determined that some of the recommendations are appropriate and has aligned the data collected in the database with the recommendations of the workgroup and lessons learn since the conclusion of the workgroup. The result of this effort is a national database that will contain only data necessary to complete essential program management.

Several of the workgroup's recommendations addressed formatting to make the forms easier to use. These recommendations are not being considered because they will be replaced by the

national UIC database which will receive data directly from states' databases. If there is a need to develop web-entry of data, EPA will evaluate the format of the revised 7520. In addition, EPA will be using revised form 7520-16 in this renewal.

We will also continue to explore other means of reducing burden and cost as appropriate. The Program has submitted a Burden Reduction report that serves at the strategy to address OMB's greatest concern, burden reduction.

Burden Reduction Highlights

Electronic reporting is an important initiative for the UIC program. We are currently getting both inventory and Program Activity Measures (required by OMB) through electronic data web entry systems. EPA is near the completion of the development a national UIC database management system that will allow the flow of required state data to the Agency. This effort will also supplement the needs of other EPA Water and Compliance-Enforcement programs. This is the first time such an effort of this magnitude has been made to report on all five injection well classes nationally. Once the database is deployed this Fall, we expect to see some burden reduction during the next clearance period. We believe it would increase the efficiency of some record keeping and reporting required of owners/operators and states.

In December 2006, we sent a draft Burden Reduction report to OMB detailing the areas that we were looking at for burden reduction. As mentioned earlier in this response document, we will continue to study this matter and implement burden reduction where possible. We believe that we might be able to mimic some innovated approaches burden reduction in a few states by encouraging e-permitting. This would include eliminating unnecessary data elements that will not assure public health and environmental protection.

The 7520 Federal Reporting forms will remain in the program as crucial data collection instrument. They will receive data electronically and where possible unnecessary data elements will be eliminated.