

## **Appendix D: Burden Reduction Efforts in the UIC Program**

In 2006, EPA's Underground Injection Control (UIC) Program completed an in-depth evaluation of options to reduce reporting burden on injection well owners and operators. Electronic reporting was identified as the option most likely to offer significant burden reduction opportunities for owners or operators and state primacy agencies.

To increase the use of electronic reporting in the UIC Program, EPA began a number of initiatives related to reporting by injection well owners or operators and by permitting authorities. This includes developing Agency data systems, supporting state efforts to implement electronic reporting by owners or operators, and providing technical and financial support to encourage electronic data reporting via the National UIC Database. This appendix describes these efforts.

### ***Summary of the 2008 Burden Reduction Report***

In 2008, the UIC Program discussed the ongoing efforts to reduce reporting burden on injection well owners and operators in the paper, "Evaluation of Burden Reduction Opportunities Related to Some UIC Program Operator Reporting Forms." The program evaluated the reporting forms that operators are required to submit to determine whether opportunities exist to reduce burden. EPA undertook the following activities:

- Created an ad hoc workgroup of regional and state staff to review the necessity of the data collected on several of the forms, including forms 7520-6 through 7520-12, 7520-14, 7520-15, and 7520-16.<sup>1</sup>
- Reviewed each element on the owner or operator reporting forms to determine whether any elements on the reporting forms could be combined or eliminated while still ensuring the protection of underground sources of drinking water (USDWs).
- Explored options for electronic reporting of data, including web interfaces to replace the paper forms currently submitted by well owners and operators.
- Investigated whether any of the needed information could be obtained from other sources, e.g., the U.S. Bureau of Land Management (BLM). It was determined that BLM forms could not replace any of the UIC Program's owner or operator 7520 forms and provide the level of detail needed to meet UIC Program goals.

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<sup>1</sup> These forms include: Permit Application (7520-6), Application to Transfer Permit (7520-7); Injection Well Monitoring Report (7520-8); Completion Form for Injection Wells (7520-9); Completion Report for Brine Disposal, Hydrocarbon Storage, or Enhanced Recovery (7520-10); Annual Disposal/Injection Well Monitoring Report (7520-11); Well Rework Record (7520-12); Plugging and Abandonment Plan (7520-14); Inventory of Injection Wells (7520-16); and Pre-Closure Notification Form (7520-17).

Based on the research conducted for the paper, EPA concluded that eliminating forms or reducing reporting frequency was not an option due to the following:

- Most of the reported information is required by regulation and is necessary to ensure that injection wells will be sited, constructed, and operated in a manner that protects USDWs.
- Reducing reporting frequency could endanger USDWs by eliminating crucial early warnings that wells are not operating within protective parameters.
- Combining or eliminating any of the UIC reporting forms is not practical since the forms collect information generated at various milestones in the life of an injection well or are already submitted infrequently.

Electronic reporting was identified as an option that might offer significant burden reduction opportunities.

### ***Ongoing Burden Reduction Efforts: Owner or Operator Reporting***

EPA supports electronic reporting by injection well owners or operators by developing Primacy Agency databases and encouraging states to develop their own data systems.

### **EPA Initiatives**

The *Federal Requirements Under the Underground Injection Control (UIC) Program for Carbon Dioxide (CO<sub>2</sub>) Geologic Sequestration (GS) Wells* (GS Rule) requires electronic submission of all data related to Class VI (GS) wells. The GS Rule requires permit applications and all reports, submittals, and notifications required by the rule to be submitted electronically. (The rule allows for alternative methods for submission if necessary.) EPA took the opportunity to require electronic reporting from owners or operators for Class VI wells because the facilities that contain Class VI wells currently employ technologies that easily support electronic reporting. The relatively small universe of Class VI wells also makes requiring electronic reporting practical. EPA is developing a data system to collect and store Class VI well owner or operator data.

### **State Initiatives**

EPA has encouraged states to create electronic data flows from owners or operators as part of the National UIC Database effort, and has encouraged state primacy programs to apply for Exchange Network Grants to establish an electronic data flows from owners or operators to states. Some programs are taking advantage of the incentive offered by EPA to begin electronic reporting for owners or operators while other programs have taken their own initiative to reduce reporting burden on owners or operators through electronic reporting. For example:

- The Massachusetts Department of Environmental Quality, a 2007 Exchange Network Grantee, is beta testing a system for the electronic permitting of Class V wells. The system will include electronic versions of the following forms:

registration and pre-closure, well modification or conversion, well closure, well monitoring report, well completion and construction notifications, and well post-closure notification. Access to the system will be controlled with a username and password.

- The Wyoming Department of Environmental Quality used a 2005 Exchange Network Grant to establish a data flow to EPA, to enhance their UIC database and to create the Graduated Environmental Management (GEM) tool. The GEM tool allows registered users to apply for a new permit, modify an existing permit, manually enter or upload monitoring data, and upload electronic data deliverables. GEM collects information related to permits, financial assurance, well construction, facility inspections, monitoring, violation, and lab analyses. The tool allows reviewers to track the steps in the permitting process, including the method and dates of public notice, and whether public comments were received.
- The Washington Department of Ecology employs the Online UIC Well Registration System for owners or operators to register their injection wells. The system, SecureAccess Washington, is a single sign-on application gateway created to simplify access to the Washington's government services accessible via the Internet.
- The State of Utah supports electronic permitting and monitoring reporting for well owners or operators. Utah employs eReport, a secure system that uses an Extensible Markup Language (XML) data schema to transfer data over the Internet. The system allows for submission through:
  - Web forms for small operators with a few wells,
  - eReportRemote for small and mid-size operators using a spreadsheet-style format, and
  - Batch submittal for large operators.

### ***Ongoing Burden Reduction Efforts: Electronic Reporting by Permitting Authorities***

EPA encourages state primacy agencies to electronically report required information to the National UIC Database by providing technical and financial assistance to establish data flows on the National Environmental Exchange Network.

Financial assistance includes information technology activities such as node development, database implementation, and modification; data preparation activities such as data entry and data modification; and program activities to obtain legal authority to implement data flows on the Exchange Network. Financial assistance has also been used to support electronic reporting to Primacy Agencies from well owners or operators.

EPA has provided technical support to states through the development of tools to support the transition to electronic reporting. For example, EPA developed a primacy program database template based on the structure of the National UIC database to help map

program data. EPA also developed a Node Client that states without an Exchange Network node can use to submit UIC data to the National UIC Database without making the investment in a state Exchange Network node. EPA provides on-going assistance to several primacy agencies with data mapping, data submission, and data quality assurance/quality control activities.

EPA established Integrated Project Teams to provide peer-to-peer support for programs that are either beginning to map their data to the National UIC Database or have an established data flow. Additional information about this technical support is presented in Appendix B of the UIC Programmatic Information Collection Request.

EPA is also encouraging the shift to electronic reporting by offering Exchange Network Grants to support state's efforts to establish an electronic data flow from owners or operators to states (as described above) and then to EPA. To date, 14 states have initiated the data transfer process.

Additionally, in FY 2014, to help reduce reporting burden on states, EPA reduced the frequency at which e-reporters must upload information to the National UIC database from quarterly to semi-annually. This is estimated to result in a burden savings to states of 3,600 burden hours annually.

### ***Conclusion***

EPA continues efforts to encourage primacy programs to develop end-to-end electronic data flows starting with operators and ending with EPA. EPA has made grant money available to assist state programs in establishing electronic data flows through the Exchange Network Grant. To date, over 20 programs have received assistance through the Grant.

The support network established for the National UIC Database has provided opportunities for peer-to-peer sharing of success stories and lessons learned for electronic data flows from owners or operators. EPA has highlighted the efforts of programs with end-to-end electronic data flows at national meetings such as the Ground Water Protection Council's annual UIC Conference.

Without mandating a change in reporting formats, EPA has worked to support the implementation of voluntary changes in reporting by owners or operators. Primacy programs have also seen the advantages of electronic reporting and have unilaterally made changes in their reporting practices.