

Appendix C: UIC Program Owner or Operator Burden Reduction Efforts

In 2017 and 2018, EPA examined the UIC Program's reporting forms to identify ways to reduce the reporting burden on injection well owners or operators while maintaining USDW protection. The workgroup identified elements on the forms that could be deleted or clarified, revised the form instructions, and combined some of the forms. These changes improve clarity, reduce the need for revising/correcting submitted information, and decrease the time needed to process UIC requests, e.g., for permits. Collectively, these changes will reduce UIC reporting burden by 10,595 hours (approximately 3.5 percent) annually. This appendix describes the changes to the forms and the resultant burden reductions.

Background

Owners or operators of injection wells submit information via the 7520 reporting forms throughout the duration of an injection project to meet the Underground Injection Control (UIC) Program's requirements.¹ This information is submitted prior to injection to demonstrate that the wells will be sited/constructed to protect underground sources of drinking water (USDWs), during well operations to verify that the well is operating as designed, and after closure to confirm that the well will not allow fluid movement that could endanger USDWs.

In 2017, EPA formed a workgroup to examine each of the reporting forms and identify ways to reduce owner or operator burden while maintaining USDW protection. The workgroup identified elements of the forms that could be deleted, significant and minor changes that clarify the information being requested, and improvements to the forms' instructions. These revisions:

- Reduce the burden necessary to complete the forms.
- Improve the likelihood that the forms will be submitted correctly (and therefore reduce the time to process UIC requests).
- Simplify the reporting process (particularly to small businesses)—while continuing to provide EPA with all of the information needed to ensure USDW protection.

None of the technical activities associated with reporting UIC information have changed, as the UIC program's USDW-protective requirements have not changed. Therefore, these changes reduce the clerical (i.e., non-technical) burden associated with completing the forms.

Burden Reduction by Form

The sections below describe the changes EPA made to each of the owner or operator reporting forms, along with the resultant burden change. Table 1 (on the last page of this appendix) summarizes all of the changes. These changes fall into three categories:

- Deletions of fields that request information that can be reported in other ways or that already exists in the permit record.

¹ The 7520 forms must be used by owners or operators of wells in states where EPA directly implements the UIC program; states with primary enforcement authority may use these forms or an equivalent form.

- Significant changes that reflect EPA’s recognition of how information is generated or collected by well owners or operators or that allow submittal of documents generated as a customary business practice. These changes reduce owner or operator time spent on repackaging information solely for the purpose of reporting.
- Minor changes that: clarify or better define what EPA needs, provide continuity across all submittals over the duration of a project, or streamline the reporting of common information.

7520-6: Permit Application

The permit application form is completed by applicants seeking UIC permits; it is primarily used by owners or operators of Class I, Class II, and Class III wells, although prospective owners or operators of some technically complex Class V wells may apply for UIC permits in limited cases. EPA made the following changes to the permit application form:

- Deleted three fields, including: legal contact, number of existing wells, and number of wells per type.
- Implemented two changes that clarify the information needed regarding ownership type and commercial facilities. EPA also made minor clarifications to reduce the need for double entry of contact information, reference a list of available SIC codes, and clarify the information requested related to well status and latitude/longitude.
- Created separate permit application forms and instructions tailored to each class of injection well. EPA also significantly clarified the instructions for the attachments to the permit application form. The revised instructions are organized to facilitate completing the required attachments. For example, all of the information related to specific topics (e.g., AoR and corrective action, site geology, well construction, or testing and monitoring) is presented together to improve understanding. The instructions also expand on and clarify the information EPA is requesting of each well class. These changes will help permit applicants improve the quality of their submittals and potentially reduce the need for revisions/corrections to the permit application, which will ultimately save burden and the total time needed to complete the application process.

Overall, these changes reduce the clerical burden associated with permit applications by 3 to 4%,² saving permit applicants 713 hours annually (most of this savings is to Class II applicants, due to the number of Class II permit applications submitted annually).

7520-7: Application to Transfer Permit/Ownership

This form, which may be submitted by Class I, II, and III well owners or operators occasionally during the permit term, ensures that the Director has current information on who owns/operates the well. EPA made the following changes to this form:

² The percent reduction in the clerical burden varies by well class because EPA estimates different reporting burdens for each class of injection well based on the specific activities performed to meet the class-specific requirements.

- Deleted six fields that are not relevant to processing the ownership transfer, including: name/address of surface owner; a graphical depiction of the township, range, and section of the well location; well status; type of permit; number of wells; and lease number.
- Clarified what is requested in the well activity field.
- Developed instructions to clarify the information requested.

These changes collectively reduce the clerical burden associated with submitting Form 7520-7 by 7 to 13%, for an overall annual savings of 91 hours.

7520-8: Quarterly Injection Well Monitoring Report

The Injection Well Monitoring Report must be submitted by owners or operators of non-Class II wells (primarily Class I and III wells) quarterly during injection operations. It provides information to demonstrate that the well is operating in compliance with the UIC permit and has mechanical integrity or to provide early indication of USDW endangerment. EPA made the following changes to the quarterly monitoring report:

- Clarified the monthly total volume and yearly cumulative volume injected fields to better align to how injection well owners or operators record this information. Because each of these items is reported for each of three months, this equates to 6 significant clarifications to the form.
- Clarified that reporting of minimum, average, and maximum temperature and minimum, average, and maximum pH need only be reported if these are specified in the UIC permit. Because each of these parameters is reported for each of three months, this equates to 18 significant clarifications.
- Developed instructions that describe and clarify the information to be reported.

These changes reduce the clerical burden to Class I and Class III well owners or operators associated with quarterly reporting of monitoring results by 4 to 11%, for a total annual burden savings of 4,338 hours.

7520-11: Annual Class II Disposal/Injection Well Monitoring Report

Owners or operators of Class II wells must submit annual monitoring reports to demonstrate that the well is operating as planned and has mechanical integrity or provide early indication of USDW endangerment. EPA made the following changes to the annual monitoring report:

- Deleted name/address of surface owner; township, range, and section depiction; type of permit; and number of wells.
- Deleted average injection pressure and minimum injection pressure; because both of these parameters are reported for each month of the year, this equates to 24 deletions from the form.
- Clarified that reporting the tubing-casing annulus pressure is required only if it is specified in the UIC permit; because this is reported for each month of the year, this equates to 12 changes to the form.

- Clarified what must be reported for well activity and lease name.
- Provided instructions that describe or clarify the information to be reported.

These changes reduce the clerical burden associated with annual reporting on Class II monitoring by approximately 6%, for a total annual burden savings of 1,500 hours.

7520-16: Inventory of Injection Wells

The inventory form is submitted by owners or operators of Class V wells before the well is constructed to provide basic information about the well (in lieu of a permit application) to ensure that the Director is aware of the existence of the well. EPA made the following changes to the inventory form:

- Deleted four fields that are not critical to maintaining the injection well inventory including: transaction type, numeric county code, facility ID, and ownership.
- Changed the format to facilitate data entry of the requested information about the facility and the legal contact.
- Clarified the instructions for entering latitude and longitude information.

These changes collectively reduce the clerical burden to Class V well owners or operators associated with submitting inventory information by approximately 31%, for an overall annual savings of 2,811 hours.

7520-17: Pre-Closure Notification Form

Class V well owners or operators submit a pre-closure notification form before plugging their well to demonstrate to the Director that the well will be plugged in a manner that will not allow it to become a conduit for fluid movement that could endanger USDWs.

This form was developed in 1999 in connection with an effort to use “plain English” and make the reporting requirements as brief and clear as possible. Therefore, the pre-closure notification form presented limited need for clarification. EPA made the following changes to the pre-closure notification form:

- Deleted the name of preparer field.
- Changed the format to facilitate data entry of the requested information about the facility and the owner or operator.
- Clarified what must be reported regarding the well’s construction.

Overall, these changes reduce the clerical burden associated with pre-closure notifications by approximately 14%, saving Class V well owners or operators 90 hours annually.

7520-18: Completion Report for Injection Wells

The well completion form, which must be submitted following construction or conversion of a well, provides information to verify that the well was constructed as planned in order to ensure that injected fluids will remain within the identified injection zone.

As part of the burden reduction effort, EPA merged the former Completion Form for Injection Wells (Form 7520-9) with the Completion Report for Brine Disposal, Hydrocarbon Storage, or Enhanced Recovery (Form 7520-10) into a significantly streamlined form that allows owners or operators to submit limited information on the form and attach contractor/service company reports or similar documents that are developed as a customary business practice.

- For Class II well owners or operators (who submit 97 percent of all completion reports), this reduced the number of fields that were previously on Form 7520-10 from 39 fields to 22 fields. These owners or operators will no longer need to record: the name/address of the surface owner; township, range, and section depiction; type of permit; number of wells; well activity; lease name; anticipated daily injection pressure; type of injected fluid; casing and tubing information (i.e., outside diameter, weight, depth); stimulation information (i.e., interval treated, materials used); wireline log types and intervals logged; and cement information (i.e., sacks and class of cement, and the depth and diameter of the borehole cemented).
- Other owners or operators who previously reported on Form 7520-9 no longer need to report: name/address of owner or operator, facility address, well status, well activity, type of permit, number of wells, or lease number. Because Form 7520-9 already requested limited information, fewer deletions were needed to streamline the form.

Additionally, EPA:

- Clarified six fields on the previous Form 7520-10 and two of the fields that were on Form 7520-9.
- Clarified the instructions (particularly those for Class II well owners or operators) to help owners or operators improve the quality of their submittals so that multiple revisions/corrections are not needed, which will ultimately save burden.

These changes reduce the clerical burden to Class I and Class III well owners or operators by 2 to 4% and the clerical burden associated with Class II completion reporting by 30%, for an overall annual savings of 914 hours.

7520-19: Well Rework, Plugging & Abandonment Plan, or Plugging & Abandonment Affidavit

A Plugging and Abandonment Plan must be submitted with a Class I, II, or III permit application to provide information to demonstrate that the well will be plugged in a manner that will not allow it to become a conduit for fluid movement. Following closure of the well, a report is submitted to document the procedures followed. Additionally, owners or operators may occasionally need to submit information on well reworks during the permit term so the Director can ensure that well maintenance activities will be conducted in a manner that will not compromise the integrity of the well.

EPA merged the former Well Rework Record (Form 7520-12) and Plugging and Abandonment Plan (Form 7520-14) to streamline the information reported and afford burden savings where owners or operators can update previously submitted information and attach reports that are developed as a customary business practice and that could be interpreted more easily. EPA also developed instructions for the form to clarify the information needed and reduce confusion.

To reduce the burden associated with submitting information about well reworking that was previously reported on Form 7520-12, EPA:

- Deleted six fields, including: name/address of contractor; the graphical depiction of the township, range, and section of the well location; total depth before rework; total depth after rework; type of permit; and number of wells.
- Simplified the reporting of technical information by allowing owners or operators to submit contractor/service company reports or similar documents in lieu of entering the information on the form. This change eliminates burdensome data entry of information about: casing record before rework (i.e., casing size and depth, cement sacks and type, top and bottom of perforations, and treatment record); casing record after rework (i.e., casing size and depth, cement sacks and type, top and bottom of perforations, and treatment record); rework operations; and wireline log information (type and intervals).
- Clarified what must be reported regarding the well type and well identifying information.

To reduce the burden associated with reporting on well plugging and abandonment that was previously submitted on Form 7520-14, EPA:

- Deleted five fields, including: name/address of owner or operator, well location depiction, lease name, type of authorization, and number of wells.
- Eliminated data entry of technical information related to: casing and tubing record after plugging (i.e., size, weight, put in well, left in well, hole size); method of plug emplacement; cementing information (i.e., size of hole or pipe, depth to bottom of tubing or pipe, sacks of cement, slurry volume, calculated top of plug, measured top of plug, slurry weight, and type of cement); and information on open hole and/or perforated intervals. Other significant burden reduction changes are provided by no longer requiring the owner or operator to enter information about Class II subtypes or the cost estimate on the form.
- Clarified what must be reported regarding the locational and well identifying information.

These changes reduce the clerical burden associated with reporting on planned well reworking by 10 to 19%, and reporting associated with well plugging and abandonment by 4 to 17%, for a total annual savings of 139 hours.

Total Burden Reduction

Collectively, the changes described above will reduce annual burden to injection well owners or operators associated with completing the UIC reporting forms by 10,595 hours, an annual burden savings of approximately 3.5 percent. Figure 1 below summarizes this information, presenting the previous and revised unit and total burdens for each form, along with the total annual burden savings associated with the revisions to each form.

Figure 1: Summary of 7520 Form Burden Reduction to Owners or Operators

Form	Well classes responding	Number of responses	Previous burden/response	Previous total annual burden, by class	Previous total annual burden, by form	Revised burden/response	Revised total annual burden, by class	Revised total annual burden, by form	Total annual burden savings
7520-6: UIC Permit Application	I-H	8	217.1	1,262	58,913	214.9	1,251	58,200	713
	I-NH	14	104.0	1,396		103.5	1,389		
	II	1,289	61.4	53,187		60.8	52,505		
	III	18	123.7	2,029		123.1	2,019		
	V	10	104.0	1,040		103.6	1,036		
7520-7: Application to Transfer Permit	I-H	1	3.0	3	1,392	2.9	3	1,301	91
	I-NH	1	4.0	4		3.9	4		
	II	270	5.0	1,351		4.7	1,262		
	III	6	6.0	34		5.8	33		
7520-8: Injection Well Monitoring Report	I-H	295	25.0	7,368	57,543	24.7	7,293	53,206	4,338
	I-NH	1,448	16.0	23,175		14.4	20,847		
	III	900	30.0	27,000		27.9	25,066		
7520-9: Completion Form for Injection Wells	I-H	8	4.0	32	160	3.9	32	156	4
	I-NH	14	4.0	56		3.9	55		
	III	18	4.0	72		3.9	70		
7520-10: Completion Report for Brine Disposal, Hydrocarbon Storage, or Enhanced Recovery Well	II	1,228	4.0	4,911	4,911	3.3	4,001	4,001	910
7520-11: Annual Disposal/Injection Well Monitoring Report	II	5,316	30.0	159,468	159,468	29.7	157,969	157,969	1,500
7520-12: Well Rework Record	I-H	1	3.0	3	1,392	2.9	3	1,301	91
	I-NH	1	4.0	4		3.9	4		
	II	270	5.0	1,351		4.7	1,262		
	III	6	6.0	34		5.8	33		
7520-14: Plugging and Abandonment Plan	I-H	8	6.6	53	8,024	6.1	49	7,976	48
	I-NH	14	6.6	92		6.1	86		
	II	1,289	6.0	7,734		6.0	7,699		
	III	18	8.0	144		7.9	141		
7520-16: Inventory of Injection Wells	V	19,276	0.5	9,638	9,638	0.4	6,827	6,827	2,811
7520-17: Pre-Closure Notification Form	V	659	1.5	989	989	1.4	899	899	90

Notes:

Forms 7520-9 and 7520-10 have been merged into a combined well completion form (Form 7520-18).

The Paperwork Reduction Act notice on Form 7520-9 reflected the estimated hours to complete the form and attachments; the “previous burden/response” burden in the table above reflects the ICR estimate to complete the form.

Forms 7520-12 and 7520-14 have been merged into a combined well reworking and plugging and abandonment form (Form 7520-19).

Numbers may not appear to total due to rounding.

Table 1: Changes to the 7520 Forms

Form	Deletions	Significant changes	Minor clarifications
7520-6: Permit Application	<ul style="list-style-type: none"> • Legal contact • Number of existing wells • Number of wells per type 	<ul style="list-style-type: none"> • Clarify instructions about reporting type of ownership • Clarify instructions about what is meant by a "commercial" facility 	<ul style="list-style-type: none"> • Reference "owner" contact information if it is the same as operator • Reference a SIC code list • Clarify the well status information requested • Use decimal system for latitude and longitude (2 changes)
7520-7: Application to Transfer Permit	<ul style="list-style-type: none"> • Name/address of surface owner • T-R-S depiction block • Well status • Type of permit • Number of wells • Lease number 		<ul style="list-style-type: none"> • Replace "Well Activity" with "Well Type"
7520-8: Injection Well Monitoring Report		<ul style="list-style-type: none"> • Change monthly total and yearly cumulative volume units to barrels (6 items) • Clarify that minimum, average, and maximum temperature need only be reported if specified in the permit (9 items) • Clarify that minimum, average, and maximum pH need only be reported if specified in the permit (9 items) 	
7520-9: Completion Form for Injection Wells	<ul style="list-style-type: none"> • Name/address of owner or operator • Facility address • Well status • Well activity • Type of permit • Number of wells • Lease number 		<ul style="list-style-type: none"> • Eliminate first two Qtr/Qtr section entries • Replace "Well Activity" with "Well Type"

Form	Deletions	Significant changes	Minor clarifications
7520-10: Completion Report for Brine Disposal, Hydrocarbon Storage, or Enhanced Recovery Well	<ul style="list-style-type: none"> • Name/address of surface owner • T-R-S depiction block • Type of permit • Number of wells • Well activity • Lease name • Anticipated daily injection pressure • Type of injected fluid • Casing and tubing information (3 changes) • Stimulation information (2 changes) • Wireline log information (2 changes) • Cement information (4 changes) 		<ul style="list-style-type: none"> • Replace “Well Activity” with “Well Type” • Clarify what is requested in the injection interval fields (2 changes) • Re-title “Depth to Bottom of Lowermost Freshwater Formation” • Replace “Lease name” with “Full well name” • Clarify the instructions regarding “Materials and amount used”
7520-11: Annual Disposal/Injection Well Monitoring Report	<ul style="list-style-type: none"> • Name/address of surface owner • T-R-S depiction block • Type of permit • Number of wells • Average pressure (12 changes) • Minimum pressure (12 changes) 	<ul style="list-style-type: none"> • Clarify that reporting the tubing-casing annulus pressure is only required if it is specified in the permit (12 changes) 	<ul style="list-style-type: none"> • Replace “Well Activity” with “Well Type” • Replace “Lease name” with “Full well name”
7520-12: Well Rework Record	<ul style="list-style-type: none"> • Name/address of contractor • T-R-S depiction block • Total depth before rework • Total depth after rework • Type of permit • Number of wells 	<ul style="list-style-type: none"> • Replace requests for detailed information with open space to describe the work, including: <ul style="list-style-type: none"> ○ Casing record before rework (7 changes) ○ Casing record after rework (7 changes) ○ Rework operations ○ Wireline logs (2 changes) 	<ul style="list-style-type: none"> • Clarify what is requested for “Well Activity” by renaming as “Well Type” • Replace “Lease name” with “Full well name”

Form	Deletions	Significant changes	Minor clarifications
7520-14: Plugging & Abandonment Plan	<ul style="list-style-type: none"> • Name/address of owner or operator • T-R-S depiction block • Lease name • Type of authorization • Number of wells 	<ul style="list-style-type: none"> • Replace requests for detailed information with open space to describe the planned work, including: <ul style="list-style-type: none"> ○ Casing and tubing record after plugging (5 changes) ○ Method of cement plug emplacement ○ Information about cement plugs (8 changes) ○ Open hole and/or perforated intervals (4 changes) • No longer report Class II subtypes in well class • Allow the owner or operator to attach the well plugging cost estimate 	<ul style="list-style-type: none"> • Eliminate first two Qtr/Qtr section entries • Replace “Lease name” with “Full well name”
7520-16: Inventory of Injection Wells	<ul style="list-style-type: none"> • Transaction type • Numeric county code • Facility ID • Ownership 	<ul style="list-style-type: none"> • Combine facility name and address into a single space to facilitate data entry • Combine legal contact name, address, and organization into a single space to facilitate data entry 	<ul style="list-style-type: none"> • Clarify latitude and longitude instructions
7520-17: Pre-Closure Notification Form	<ul style="list-style-type: none"> • Name of preparer 	<ul style="list-style-type: none"> • Combine facility name and address into a single space to facilitate data entry • Combine owner or operator name and address into a single space to facilitate data entry 	<ul style="list-style-type: none"> • Replace “Well construction” with “well sub-type”

Notes:

The forms listed on this table reference the previous form numbers. EPA merged Forms 7520-9 and 7520-10 into a combined well completion form (Form 7520-18), and Forms 7520-12 and 7520-14 into a combined well reworking and plugging and abandonment form (Form 7520-19).