



CLASS V STRAT TEST WELL PERMIT APPLICATION INSTRUCTIONS

OFFICE OF PERMITTING AND COMPLIANCE
ENGINEERING DIVISION
617 N. Third St., 9th FLOOR
BATON ROUGE, LA 70802
Injection-Mining@la.gov
(225) 342-5515

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

- **Application Fee:** Submit the non-refundable application fee for each well per LAC 43:XIX.Chapter 7.
- **One Form UIC-25 STRAT TEST** with original signature.
 1. If the proposed well is associated with a potential Class VI geologic sequestration project, the applicant must provide written notification of the well to the mineral owner(s) at the proposed location.
 2. Please use the following designations depending upon which Office of Permitting and Compliance district the well is to be located in (click [here](#) to see the district outlines):
 - WILDCAT-SO LA LAFAYETTE DIST (9727)
 - WILDACT-NO LA SHREVEPORT DIST (9715)
 - WILDCAT-NO LA MONROE DIST (9709)
 3. Do not make unapproved edits to the application form. Any alterations may result in a Notice of Deficiencies and rejection of the application form. If a portion of the form does not appear to be working correctly, please contact the Engineering Division.
- Two original Form MD-10-R-A for each existing well to be converted (if conversion is proposed);
- **ATTACHMENT 1** – One original Certified Location Plat showing the location of each Class V well location;
 1. Please be sure to comply with the requirements of the [IMD-GS-10 Policy](#)
- **ATTACHMENT 2** – An annotated copy of an electric well log of the nearest offset well that shows the Underground Source of Drinking Water (USDW);
 1. Conduct a one-mile search from the proposed well location to locate the closest well with an e-log that shows the lowermost USDW. The USDW can be determined from the deep induction curve on the e-log. Resistivity changes with temperature and depth, therefore the guidelines below are used to approximate the lowermost USDW in sands at the following depths:
 - a. Ground surface to 1,000 feet: 3 ohms or higher is considered USDW;
 - b. 1,000 feet to 2,000 feet: 2 ½ ohms or higher is considered USDW; and
 - c. 2,000 feet and deeper: 2 ohms or higher is considered USDW.
 2. Clay or shale intervals with resistivity values higher than these are not considered USDW.
- **ATTACHMENT 3** – An annotated copy of an electric well log of the nearest offset well that shows the proposed injection zone (if injection is proposed);
- **ATTACHMENT 4** – Schematic(s) of the Class-V well showing:
 1. Casing diameter, specifications, material (PVC, steel, etc.), and depth,
 2. Screen type, length, material, slot or opening size,
 3. Injection tubing size inside casing (if any),
 4. Hole diameter (bit size),
 5. Amount and type of cement used and depths to top and bottom of cement,
 6. Wellhead showing all fittings,
 7. Discharge line diameter and connection to wellhead,
 8. Well house (if any).

Schematics should be stamped and signed by a Louisiana-registered Professional Engineer (PE) as appropriate
- **ATTACHMENT 5** – Work prognosis for drilling, completing, and testing the well;

- **ATTACHMENT 6** – Financial surety will be required for Class V per LAC.XIX.104.C.5. Bonding costs will be the estimated cost for the actual plugging and abandonment (P&A) of the well.
 1. Please provide a P&A procedure, schematic, and third party cost estimate
 2. The acceptance of the P&A procedure will not constitute approval to P&A the well to those standards and will be only used to verify the third party estimate.
- **ATTACHMENT 7** – IT Questions Documentation. See Section III below.
- **ATTACHMENT 8** – Laboratory analysis of injection test fluid from a LELAP accredited laboratory (if injection is proposed). The laboratory analysis must be a signed original from a LDEQ LELAP accredited laboratory. A list of laboratories accredited by LDEQ can be found [here](#). The analysis sheet(s) must, at a minimum, include measurements of chlorides (mg/l), total dissolved solids (mg/l), pH, specific gravity, and temperature of the fluid sample when specific gravity was measured.

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

- Operating a Class-V well without a permit is a violation of Statewide Order No. 29-N-1 (LAC 43:XVII, Subpart 1) and may subject the well owner to enforcement action including fines as provided by La. R.S. 30. No fines will be imposed on the owner of an existing unpermitted injection well provided the owner submits an application for a permit. However, repairing, stimulating, plugging or performing other work on a Class V well without a work permit (Form UIC-17) may subject the well owner to a fine.
- After completing the Class V well, a permanent, weather-proof sign not less than 1 foot by 2-foot in size must be erected within ten feet of the well, which, at a minimum shows the Well Name and Office of Permitting and Compliance issued Well Serial Number. If the Class V well is enclosed within a well house, the sign may be inside the well house, if it is prominently visible upon entering.
- After completing the Class V well, complete and submit the Form UIC-42 STRAT TEST.
- When abandoning, the well must be plugged in accordance with Office of Permitting and Compliance guidelines in effect at the time of abandonment.

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

Mailing Address

Office of Permitting and Compliance
 Engineering Division
 617 N. Third St., 9th Floor
 Baton Rouge, LA 70802

III. CONSTITUTIONAL CONSIDERATIONS: “IT DECISION” QUESTIONS:

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

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

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

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

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