

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

INTEROFFICE COMMUNICATION

SUPERVISOR OF WELLS LETTER

Letter No. 2011-1
Effective Date: Immediately

TO: Staff of District Offices and Permits and Bonding Unit, Office of Geological Survey

FROM: Harold R. Fitch, Chief, Office of Geological Survey

DATE: May 23, 2011

SUBJECT: Permit application reviews for wells that may be hydraulically fractured

The permit review practices covered by this letter are currently the subject of informal verbal direction. The purpose of this letter is to confirm that direction and to provide additional details. For clarification, "hydraulic fracturing" is defined as a well completion technique that involves pumping fluid and proppants into the target formation to create or propagate artificial fractures, or enhance natural fractures, for the purpose of improving the deliverability and production of hydrocarbons.

Staff of the Permits and Bonding Unit shall adhere to the following practice when conducting a review of an application for a Permit to Drill and Operate for an oil and gas well that may be hydraulically fractured:

1. Identify recorded existing or permitted well bores within the following radii of the proposed well:

Depth of Proposed Well	Radius of area to be reviewed
Less than 2000 feet	330 feet
2000 – 5000 feet	660 feet
More than 5000 feet	1320 feet

2. For existing or permitted wells identified in 1. that penetrate the zone that may be hydraulically fractured, determine whether the well may provide a conduit for movement of hydraulic fracturing fluids or produced fluids into a stratum containing fresh water. The determination shall take into account the anticipated radius of influence of the potential hydraulic fracturing.
3. If a potential conduit is identified in 2., require the applicant to do one of the following:
 - a. Relocate the proposed well to a location such that all potential conduits are outside the area of review.
 - b. Provide documentation demonstrating that the hydraulic fracturing will not cause the movement of hydraulic fracturing fluids or produced fluids into a fresh water aquifer.
 - c. Provide a written plan reflecting the actions or modifications necessary to prevent the potential fluid movement of concern.

4. Disputed cases will be referred for resolution through the Office of Geological Survey chain of command.



Harold R. Fitch
Assistant Supervisor of Wells