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STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
LANSING



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Class II Injection Well Owner/Operator

SUBJECT: Option for Disposal of Fluids from Remediation Sites
Reporting and Documentation Requirements

This guidance document is in effect, replacing the subject matter letter dated February 7, 2024, and designates the reporting and documentation requirements for fluid disposal from Operator-Owned Remediation Sites.

As an owner/operator of a Class II Disposal Well, this document is to inform you of an option established for your company to receive approval for the disposal of fluids generated from an operator-owned Part 615 remediation (spill/loss) site into an operator-owned disposal well(s).

Part 615, Supervisor of Wells, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA), and the administrative rules promulgated thereunder, allows operators to dispose of fluids generated from operator-owned Part 615 remediation sites upon completion of the following conditional requirements:

1. Request and receive written approval for each new remedial source/site.
2. Submit analytical data of the source fluid with the parameters indicated below.
3. Submit a list of the approved source(s) on an annual basis.

MiSTAR document submittal:

Owner/operators must use the “New Document Upload” feature in the MiSTAR UIC application to request approval for disposal of fluids from new remediation source(s) and to submit the list of remedial sources disposed on an annual basis. Essential steps for proper association or classification of an uploaded document are in the bulleted list below. Required document content is discussed in subsequent sections.

- For requesting approval for a new remediation source, select the appropriate “Document Type” of “Remediation Sources New”.
- For the annual reporting requirement, select the “Document Type” of “Remediation Sources Annually”.
- Select the appropriate “Associated Wells” to indicate the Class II disposal well to be utilized for source disposal and then select the appropriate “Document Status” of “Submitted.”
- Once the required fields are completed in MiSTAR, the “Save” button will turn blue and become “live.” Operators must then save the uploaded document with the completed fields/associations to submit it for review and/or approval.

To request approval for disposal of fluids generated from a remediation site:

A cover letter on company letterhead must be submitted indicating that the letter's purpose is to request approval for disposal of a new remediation source. The cover letter must include the following information pertaining to each new source:

- a. Owner/Operator Name
- b. Well Name and Permit Number of the Brine disposal well to be utilized
- c. Remediation Site Name, Well Name and Permit Number, Facility Name and Number, and GRMD Spill Number (as applicable)
- d. Location Information of Remediation Site - Township, Range, Section, and County
- e. Analytical Data of Remediation Fluid (see below)

To submit a list of remediation source(s) of disposed fluids on an annual basis:

A cover letter on company letterhead must be submitted indicating that the letter's purpose is for submitting a list of remediation sources on an annual basis. Operators must list all the sources that are approved for disposal and designate whether the source was disposed of in the calendar year or not. Approved sources that are no longer required to be disposed of must also be indicated as a source no longer being remediated and should not be included in subsequent reports. The annual report must be submitted by January 31st of the following calendar year. The list of sources must include the following information pertaining to each source:

- a. Owner/Operator Name
- b. The MiSTAR document ID number associated with the initial approval
- c. Well Name and Permit Number of disposal well utilized
- d. Remediation Site Name, Well Name and Permit Number, Facility Name and Number, and GRMD Spill Number (as applicable)
- e. Location Information of Remediation Site - Township, Range, Section, and County
- f. The total volume of fluids disposed of from each spill/loss/remediation site in the calendar year. The volume shall be reported in barrels.

Analytical data and documentation of spill/remedial fluids:

The following analytical data and documentation is required to be submitted for sites being remediated for a brine or oil spill/loss:

- a. Analytical data that includes specific conductance as an indication of the dissolved solids, specific gravity, and a determination of the concentration of calcium, sodium, magnesium, chloride, sulfate, sulfide, carbonate, total iron, barium, and bicarbonate.
- b. Additional analyses of the remedial fluids for hydrocarbon indicator parameters is also required and shall include benzene, toluene, ethylbenzene, total xylenes, 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene, naphthalene, and 2-methylnaphthalene (BTEX + 4).

- c. Laboratory report documentation that clearly indicates the applicable new source, the date the chemical analysis was conducted, and analytical results are on the laboratory's letterhead with the chain-of-custody included.
- d. The date the analysis was conducted must be less than one year from the date the new source(s) is submitted for approval.

If you have any questions regarding these requirements, please contact GRMD's UIC staff for assistance by email at EGLE-GRMD-UIC@Michigan.gov or by phone at 517-284-6826.