

# Frequently Asked Questions

## **Reporting Requirements**

### **How does an operator schedule a Mechanical Integrity Test?**

Scheduling an MIT is done through MiSTAR using the Notification Template submitted by the operator. Operators are required to notify EGLE no less than five days before the test but are strongly encouraged to notify EGLE greater than 5 days whenever feasible. Operators may proceed to conduct a properly scheduled test unless they are notified by EGLE staff to not conduct the test as scheduled. A properly scheduled test is a Notification Template for scheduling a MIT that has been duly completed, submitted, and validated in MiSTAR by the operator within 5 days of the test date.

### **How does an operator report the results of a Mechanical Integrity Test?**

Within 14 days after the test, the operator shall report the test results using MiSTAR. The MIT template must be completed, submitted, and validated by the operator to be considered a valid test submittal. In addition to submitting the MIT template, requirements for providing pressure gauge calibration information or pressure charted documentation associated with the mechanical integrity test, is done by using the MiSTAR generic upload tool as part of the MIT reporting requirement.

### **Is an operator required to chart a Mechanical Integrity Test?**

An unwitnessed test is required to be charted. Tests that are witnessed by EGLE staff are not required to be charted. For an unwitnessed test, in addition to submitting the MIT template as indicated above, submittal of the chart and pressure gauge calibration data is done by using the MiSTAR generic upload tool as part of the MIT reporting requirement.

### **How does an operator report a Loss of Mechanical Integrity?**

Operators are required to notify EGLE within 24 hours of any pressure test failure, significant pressure changes, or other evidence of leak and are required to provide written notification within 5 days of the occurrence. Operators may provide verbal notification within 24 hours to any EGLE UIC staff (Larry Organek, Eric Kimber, Coty Withorn, or Ben Hinks.) The written notification requirement is done through MiSTAR using the Notification Template. Note: If an operator submits the Notification Template within 24 hours of the occurrence, that template shall be acceptable to comply with both the 24-hour requirement and 5 day written

notice requirement. A properly submitted Notification Template is one that has been duly completed, submitted, and validated in MiSTAR by the operator.

**Is an operator required to cease injection upon reporting a Loss of Mechanical Integrity?**

Yes. An operator must cease injection immediately upon a loss of mechanical integrity. For each reported loss of mechanical integrity, EGLE will post a Cease Injection letter in MiSTAR following the receipt of the Notification Template indicating the loss of mechanical integrity. Operators may not resume injection until an Authorization to Inject Letter has been provided to the operator by EGLE.

**How and when does an operator receive an Authorization to Inject Letter?**

EGLE will post the authorization to inject letter in MiSTAR after EGLE has received and reviewed all pertinent data indicating the permittee has demonstrated that the well has mechanical integrity. An operator may resume injection in accordance with the permit conditions following the posting of the Authorization to Inject letter.

**How and when does an operator provide the monthly or annual injection reporting requirement for annulus pressure, injection pressure, injection rate, and cumulative volume?**

An operator shall complete, submit, and validate the Injection Template using MiSTAR for completing the monthly and annual reporting requirements. The monthly reports are due within 30 days of the preceding month of injection. Annual reporting is due by March 1<sup>st</sup> of the following year of injection. A properly submitted Injection Template is one that has been duly completed, submitted, and validated in MiSTAR by the operator.

**How and when does an operator indicate noteworthy anomalies, data problems, and Maximum Injection Pressure exceedances?**

An operator shall complete, submit, and validate the Injection Template using MiSTAR using the comments section of the Injection Template to report the anomalies, data problems, and Maximum Pressure Exceedances under the time frame required for the injection template to be submitted. An operator may also report anomalies, data problems using the Correspondence document of the Generic Document upload tool.

**How and when does an operator provide the quarterly annulus fill requirement?**

An operator shall complete, submit, and validate the Quarterly Annulus Fill Template using MiSTAR. The quarterly annulus fill reports are due 45 days after the end of each quarter of the calendar year. Rule Authorized wells are exempt from this requirement.

**How and when does an operator provide the annual/other chemical analysis requirement?**

Submittal of the analysis is done by using the MiSTAR generic upload tool. An analysis for each well is required by March 1<sup>st</sup> of each year. Note: this rule provision also requires an analysis to be submitted more frequently if there has been a change in sources or characteristics of the injectate. Operators are to submit a new analysis within 10 days of a change in sources or characteristics.

**For a commercial disposal well, how does an operator report a list of sources of disposed fluids?**

Operators of commercial disposal wells are to submit the list of sources of disposed fluids by using the MiSTAR generic upload tool. A complete list of sources is required to be submitted within 45 days of the end of each quarter.

**For a commercial disposal well, how does an operator request approval for a new source of fluid for disposal?**

Operators of commercial disposal wells are to request approval for a new source by using the MiSTAR generic upload tool. Prior to injecting any new source, an operator must receive written approval from EGLE. EGLE will post a new source approval letter in MiSTAR after EGLE has received and reviewed all pertinent data regarding the new source request. The operator may inject the new source following the post of the approval letter.