

**STATE OF MICHIGAN DEPARTMENT OF
ENVIRONMENTAL QUALITY**

Supervisor of Wells Instruction 1-2002, Amended

Removal or Abandonment of Flow Lines and Facility Piping

Purpose

The purpose of this Supervisor of Wells Instruction is to provide consistent standards for the removal or abandonment of flow lines and facility piping to protect the environment, natural resources, and public health and safety.

Background

Part 615, Supervisor of Wells, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA) requires the Supervisor of Wells (Supervisor) to prevent waste. Part 615 defines waste to include, among other things, unreasonable damage to waters, soil, or property. [MCL 324.61501]

The administrative rules promulgated under Part 615 address purging, abandonment, and removal of flow lines. Rule R 324.1011 states:

Rule 1011. A permittee of a well shall purge all flow lines and vessels, including tanks, if the flow lines or vessels are not used for 1 year and shall provide notification of the purging operation to the supervisor or authorized representative of the supervisor. The supervisor may require the line to be removed or abandoned.

Rule 324.102 defines flow lines:

(r) "Flow line" means piping that connects a well or wells to a surface facility.

Properly abandoned flow lines do not pose a significant risk to water, soils, or other resources, and do not unreasonably interfere with use of the property. However, it is necessary to set specific criteria for the removal or abandonment of flow lines in order to prevent waste. In addition, the removal or abandonment of facility piping poses the same concerns for prevention of waste.

Rule 324.102 defines facility piping:

- (o) "Facility piping" means piping that connects any of the following:
 - (i) Compressors.
 - (ii) Flares.
 - (iii) Loadouts.
 - (iv) Separators.
 - (v) Storage tanks.
 - (vi) Transfer pumps.
 - (vii) Treatment equipment.
 - (viii) Vents.

Instruction

When required by the Supervisor under Rule R 324.1011, the permittee of a well shall either remove or abandon flow lines in accordance with all of the following requirements:

1. The permittee shall remove all flow lines that have less than 30 inches of cover after site restoration unless the property owner agrees in writing to a lesser depth of cover and the area above the flow line meets the Cleanup and Disposal Guidelines for Sites Contaminated with Radium-226 issued by the Michigan Department of Environmental Quality Waste Management and Radiological Protection Division.
2. The permittee shall survey all exposed portions of the flowline with a calibrated gamma radiation survey meter in contact with the flowline. If the meter indicates an exposure rate of 1.00 milliroentgens per hour (mR/h) or greater, the permittee shall progressively excavate the flow line while taking gamma radiation survey measurements in contact with the flow line. All flow line for which the meter shows an exposure rate of 1.00 mR/h or greater shall be removed. At the point where the gamma radiation measurement declines below 1.00 mR/h, the remaining flow line may be abandoned in place with no further restrictions.
3. The permittee shall assure that any removal of flow lines is done in a manner that prevents the escape of liquids, and the flow lines shall be reused, salvaged, or disposed of in a manner that prevents waste and complies with all other applicable state and federal laws and regulations.
4. Abandonment in place of flow lines shall also be subject to the following requirements:
 - a. Flow lines shall be purged with fresh water. If a fluid displacement device (a "pig") is utilized, the volume of purge water shall be sufficient to displace the pig. If a pig is not utilized, the volume of purge water shall be a minimum of three times the volume of the section of line to be abandoned. Purge water shall be disposed of by injection into an approved underground formation in a manner that prevents waste and is consistent with all applicable state and federal laws and regulations.
 - b. Flow lines that have transported liquid hydrocarbons shall be purged to remove all free hydrocarbons, as determined by visual inspection of the purge water. Purging shall continue until no visible evidence of liquid hydrocarbons exists.
 - c. Any open ends of abandoned flow lines shall be sealed.
5. "Flow line" does not include facility piping. A permittee shall remove facility piping at the time the associated surface facility is abandoned. Removal shall be done in a manner that prevents the escape of liquids, and the facility piping shall be reused, salvaged, or disposed of in a manner that prevents waste and complies with all other applicable state and federal laws and regulations.

This Instruction is issued in addition to and in conjunction with all other applicable provisions of Part 615, and all applicable administrative rules promulgated thereunder. This Instruction does not supersede the terms of any contractual agreement that require a flow line to be removed, or

are otherwise more stringent than the requirements of this Instruction. This Instruction amends and replaces Supervisor of Wells Instruction 1-2002 in its entirety. This instruction shall apply only to the removal or abandonment of flow lines and facility piping after the effective date set forth below, and shall not be applied retroactively.

THIS INSTRUCTION IS EFFECTIVE Dec. 17, 2018

Date: Nov. 5, 2018



HAROLD R. FITCH
ASSISTANT SUPERVISOR OF WELLS