

REQUEST FOR APPROVAL OF ALTERNATIVE WASTE MANAGEMENT PRACTICES - DRAFT (Unconventional Operations Only)

A. PROJECT IDENTIFICATION					
Well Operator	DEP ID	U.S. Well No. (API No.) 37- -			
Address			Site Name		
City	State	Zip Code	Well No.(s)		
Telephone No.	Fax No.		County	Municipality	
Consultant (If any)	Telephone No.		Project Name	Well Permit Issue Date	
Email			Spud Date	ESCGP No.	
Latitude (DD)			Longitude (DD)		
NOTE: All submittals must include the following information <ol style="list-style-type: none"> 1) United States Geological Survey (USGS) 7.5-minute quadrangle map showing the location of the proposed alternative waste management practice 2) Full size set of plan design drawings showing proposed facility dimensions and location relative to existing facilities (Recommend using approved or pending ESCGP drawings with a scale of 1" = 200' or smaller) 3) A brief detailed project narrative describing the proposed project 					
B. REQUEST FOR APPROVAL OF ALTERNATIVE WASTE MANAGEMENT PRACTICES					
Check the appropriate box and complete the applicable section of the form					
<input type="checkbox"/> For temporary storage, complete Section 1. Temporary Storage					
<input type="checkbox"/> For onsite disposal of uncontaminated drill cuttings, complete Section 2. Alternate Disposal Practices					
<input type="checkbox"/> For processing, complete Section 3. Residual Waste Processing					
Note For processing wastewater generated from oil or gas wells, the approval request is limited to wastewater that is either (1) processed at the well site where it was generated, or (2) processed at the well site where it will all be beneficially used to complete a well.					
1 Temporary Storage					
If approval of an alternative practice for temporary storage is being requested, describe the type of waste and the temporary storage method. Include information that will demonstrate that the proposed alternative practices will provide equivalent or superior protection to the practices identified in 25 Pa. Code Section 78a.56(b). Provide the dates an approved above ground temporary storage structure will be used in the space provided below.					
Planned dates to be used, from _____ to _____					
2. Alternative Disposal Practices					
Complete this section if requesting approval of an alternative practice to dispose of uncontaminated drill cuttings at the well site. Describe the proposed alternative practice for the type of waste material being disposed, including any additives/processes to be used as part of the alternative practice. Provide the Safety Data Sheets (SDS) for the additives used. Include information that will demonstrate the proposed practice will provide protection equivalent or superior to the practices identified in 25 Pa. Code Section 78a.61. Identify any waste stream that is created from the alternative waste disposal practice and describe how this waste material will be processed and/or disposed.					

3. Residual Waste Processing

NOTE: Any residual waste processing activities performed onsite require the development and attachment of a radioactive material monitoring and handling plan developed in accordance with the requirements included in Section 78a.58(d)

Check the appropriate box or boxes that best describe the planned processing practices.

- Processing wastewater generated at the well site
- Processing wastewater to be beneficially used to complete a well at the well site
- Processing drill cuttings
- Onsite liner processing (handling, washing, and shredding for disposal or recycling)
- Other onsite processing

- 1) Provide a narrative description and schematic for each activity checked above in Section C. a). include type of treatment; desired outcome; facility design; and methodology, including a schematic of the treatment train. Use additional pages if necessary.
- 2) If using a company/contractor for the processing facility, include the contractor's name, address, contact person, and contact information.
- 3) For processing wastewater, approval requests are limited to wastewater processing (1) at the well site where it was generated, and/or (2) at the well site where it will be beneficially used to complete a well. If approval is granted, the operator shall maintain the following records for inspection by the Department of Environmental Protection (DEP) (1) the types and amounts of waste processed, (2) the specific locations where the processed waste was generated, (3) the specific locations where the processed waste was beneficially used to complete a well, and (4) the amount beneficially used to complete a well at each well location. If wastewater processing generates any additional waste (liquid or solid), records must also be maintained documenting the method and location of handling, storage, processing, and disposal site of such additional waste.
- 4) For processing drill cuttings, approval requests are limited to processing drill cuttings at the well site where they were generated. If approval is granted, the operator must maintain the following records: (1) the types and amounts of waste processed; (2) the specific location where the processed waste was generated; (3) the specific locations where it is beneficially used, if applicable; and (4) the permit number and latitude/longitude of the disposal location.. Such records shall be provided to DEP upon request.
- 5) For processing well pad liners (ie. handling, washing and shredding) approval requests are limited to activities at the well site where the well pad liner was installed. Describe the process for handling, washing, and shredding such liners.
- 6) If using additives to treat (e.g. biocides, odor control) or process (i.e. for beneficial reuse) the contents of impoundments, tanks, and/or series of tanks provide a description of the type of waste and the additive(s) used. Attach SDS for the additives used. All liners shall be maintained so that the physical and chemical characteristics of the liner are not adversely affected by the waste and the liner is resistant to physical, chemical, and other failure during installation and use.

C. PPC Verification

NOTE: An operator must revise their Preparedness, Prevention and Contingency (PPC) Plan to implement changes to the practices identified in the plan as required by Section 78a.55(e). To the extent an operator's PPC Plan does not address the practices approved by the form, the operator must update its PPC Plan to reflect any changes to the plan required to implement the approved practices.

Upon approval will the site specific PPC Plan be revised to reflect any changes resulting from the alternative waste management practices? YES NO

D. Signature of Applicant

Signature Well Operator/Representative	Print or Type Well Operator/Representative Name and Title	Date
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DEP USE ONLY

<input type="checkbox"/> Approved <input type="checkbox"/> Denied	Conditions <input type="checkbox"/> YES, see below or attached. <input type="checkbox"/> NO	Date
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DEP Representative

Authorization No.	Date
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Conditions

DRAFT

REQUEST FOR APPROVAL OF ALTERNATIVE WASTE MANAGEMENT PRACTICES INSTRUCTIONS - DRAFT (Unconventional Operations Only)

The following instructions are designed to assist the applicant in properly completing the *Request for Approval of Alternative Waste Management Practices*, form 8000-PM-OG0071A. Use this form to request approval of alternative waste management practices in any manner other than those provided in 25 Pa.Code Sections 78a.56 through 78a.63. Submit this form along with all of the necessary documentation. Label each attachment with the applicant's name and the information item to which it refers. The applicant should be the well operator or owner only. If a contractor is used for these activities, the applicant/operator should list the contractor's name, address, contact person, and contact information in the space provided with approval request.

Type of Request for Approval of Alternative Waste Management Practices

Two types of alternative waste management practices approval requests are available:

1. Request for Approval of Alternative Waste Management Practice, form 8800-PM-OG0071A

- Submit a completed form to request approval for an initial approval of alternative waste management practices

2. Request for Approval of Previously Approved Alternative Waste Management Practices, form 8800-PM-OG0071B

- This may be utilized when a waste management practice has been previously approved and used at a different well site without resubmitting the same information submitted for the initial approval on the initial *Request for Approval of Alternative Waste Management Practice* form as long as the previously approved alternative management practice will be used in the same manner on the new site as it was on the old site.

A. PROJECT IDENTIFICATION

Provide the requested information that identifies the owner and project site where alternative waste management practices will be provided.

B. REQUEST FOR APPROVAL OF ALTERNATIVE WASTE MANAGEMENT PRACTICES

Check the box or boxes corresponding to the alternative waste management practice(s) to be employed.

1. Temporary Storage

Operators shall contain regulated substances and wastes from the drilling, altering, completing, recompleting, servicing, and plugging of a well (e.g. brines, drill cuttings, drilling muds, oil, stimulation fluids, well treatment and servicing fluids, plugging, and drilling fluids other than gases) in a tank, or series of tanks or other approved storage structures approved by the Department of Environmental Protection (DEP) in accordance with the requirements in Section 78a.56(a). Use this form to request use of practices other than those specified in Section 78a.56(a) that provide equivalent or superior protection.

Unconventional operators planning to utilize non-rigid and/or modular aboveground temporary containment structures for freshwater or wastewater need to demonstrate that they are structurally sound and reasonably protected from unauthorized acts of third parties pursuant to Section 78a.56(a)(6). This demonstration is only required for structures with a capacity greater than 20,000 gallons.

Submittal Requirements

- 1) Submit this form. Provide additional narrative and supporting information; such as liner information, chemical concentrations, Safety Data Sheets (SDS) sheets, etc. that are relative to your proposed project plan
- 2) Provide a schematic or diagram showing movement of fluids to the drill pad from storage and from the drill pad to the storage facility during planned activity
- 3) Provide quality assurance and quality control (QA/QC) plan for the structure installation, including an installation plan that describes required installation activities and identifies critical phases, processes, and techniques
- 4) Many constructed well sites contain cut and fill areas. Include an engineer certified stability analysis for installation of temporary storage systems on fill areas or where height exceeds the diameter or width of the storage facility to ensure the integrity of the structure at the proposed site
- 5) Demonstrate that secondary containment is in compliance with the following:
 - a. Equal to 110 percent of the volume of the largest primary containment unit
 - b. Synthetic flexible liner when proposed has coefficient of permeability of no greater than 1×10^{-10} cm/sec
 - c. Liner thickness of at least 30 mils

- d. Demonstrate liner compatibility with the impounded materials
- 6) Provide information relative to any engineering controls when used for the structure including:
 - a. Alarms/sensors/controls for monitoring freeboard level
 - b. Leak detection system/sensor
 - c. Proposed inlet and outlet check valves, air gaps at facility connection piping
- 7) Identify all volumes in cubic feet or gallons

2. Alternative Disposal Practices

Trash, land clearing waste, or other waste that was not generated by drilling or production of an oil or gas well may not be disposed of on the well site.

An operator may request approval for the following alternative practices for the disposal of uncontaminated drill cuttings: use solidifiers, dusting (limited to drill cuttings above the surface casing seat), unlined pits, attenuation, or other alternative practices for the disposal of uncontaminated drill cuttings. Section 78a.61(d) If requesting approval for "dusting," the drill cuttings shall only be from above the surface casing seat.

To obtain approval for these alternative practices to dispose of uncontaminated drill cuttings, operators must demonstrate that the requested practice provides equivalent or superior protection to the requirements in Chapter 78a.

Please note that any liner must be designed, constructed, and maintained so that the physical and chemical characteristics of the liner are not adversely affected by the uncontaminated drill cuttings. The liner is also required to be resistant to physical, chemical, and other failure during transportation, handling, installation.

Submittal Requirements

- 1) *Request for Approval of Alternative Waste Management Practices*, form 5500-PM-OG0071 (OG71)
- 2) Project narrative describing the proposed alternative disposal plan
- 3) A United States Geological Survey (USGS) 7.5-minute quadrangle map
- 4) Latitude and longitude location or GPS coordinates of the disposal site
- 5) Demonstrate that the requested practice provides equivalent or superior protection to the requirements of Chapter 78a.61.

3. Residual Waste Treatment/Processing

Unconventional Operators proposing on-site residual waste processing are required to develop and attach a radioactive material monitoring and handling plan developed in accordance with the requirements detailed in Section 78a.58(d). An operator may request approval to process residual waste on the well site. For processing wastewater generated from oil or gas wells, the approval request is limited to wastewater that is either (1) processed at the well site where it was generated, or (2) processed at the well site where it will all be beneficially used to complete a well. Approval is not required for the following activities: (1) mixing fluids with freshwater; (2) aerating fluids; and (3) filtering solids from fluids. If approval is granted, the operator must maintain records that include the types and amounts of waste processed and make such records available for inspection upon request to a representative of DEP.

Any approval to process drill cuttings generated from oil or gas wells is limited to drill cuttings processed at the well site where they were generated.

An operator may request approval to add any substance, including chemicals, to tank on the well site to treat its contents for beneficial use. Operators treating residual waste in tanks must demonstrate adequate containment and that treatment chemicals used are compatible with the tank liner.

An operator may request to shred well pad liners at the well site. Approvals are limited to activities on the well site where the well pad liner was installed. Requests must describe the process for handling, washing, and shredding such liners and demonstrate that these activities provide adequate environmental protections.

Submittal Requirements

- 1) *Request for Approval of Alternative Waste Management Practices*, form 5500-PM-OG0071 (OG71)
- 2) Project narrative describing the proposed residual treatment/processing
- 3) A USGS 7.5-minute quadrangle map
- 4) Latitude and longitude location or GPS coordinates of the disposal site
- 5) When synthetic flexible liners are used in the treatment process, demonstrate that the physical and chemical characteristics of the liner are not adversely affected by the waste or the process

- 6) Identify the waste stream, its volume, handling, and disposal plan
- 7) Attach SDS for alternatives used

C. PREPAREDNESS, PREVENTION AND CONTINGENCY PLAN (PPC) VERIFICATION

NOTE: An operator must revise its PPC Plan to implement changes to the practices identified in the plan as detailed in Section 78a.55(e). To the extent an operator's PPC Plan does not address the practices approved by the form, the operator must update its PPC Plan to reflect any changes to the plan required to implement the approved practices.

D. SIGNATURE OF APPLICANT

Provide the signature of the operator, name, title, date of signature and Authorization Number and Date of the Authorization in the spaces provided.

Submit application to the appropriate district oil and gas office.

Pennsylvania Department of Environmental Protection
Oil and Gas Management Program
Northwest District Office
230 Chestnut Street Telephone No. 814.332.6860
Meadville, PA 16335-3481 Fax No. 814.332.6120

Pennsylvania Department of Environmental Protection
Oil and Gas Management Program
Southwest District Office
400 Waterfront Drive Telephone No. 412.442.4024
Pittsburgh, PA 15222-4745 Fax No. 412.442.4328

Pennsylvania Department of Environmental Protection
Oil and Gas Management Program
Eastern District Office
208 West Third Street Telephone No. 570.327.3636
Williamsport, PA 17701-6448 Fax No. 570.327.3420