

Regulatory Citation(s):

78.88. Mechanical integrity of operating wells.

(a) Except for wells regulated under Subchapter H (relating to underground gas storage) and wells that have been granted inactive status, the operator shall inspect each operating well at least quarterly to ensure it is in compliance with the well construction and operating requirements of this chapter and the act. The results of the inspections shall be recorded and retained by the operator for at least 5 years and be available for review by the Department and the coal owner or operator.

(e) The operator shall submit an annual report to the Department identifying the compliance status of each well with the mechanical integrity requirements of this section. The report shall be submitted on forms prescribed by, and available from, the Department or in a similar manner approved by the Department.

Question:

The draft Department form is not yet finalized. If an operator is ready to conduct the inspection, will they be granted a one-quarter grace/transition period? Operators are uncertain regarding the specifics of the mechanical integrity demonstration that will be required on the to-be-finalized form which went out for Regional comments on February 4, 2011 and has also been circulated among operators via TAB and industry trade groups.

Response:

The start date for the mechanical integrity monitoring program is the first full quarter following finalization of the form.