

2.C CORRECTIVE ACTION PLAN AND WELL DATA

Submit a tabulation of data reasonably available from public records or otherwise known to the applicant on all wells within the area of review, including those on the map required in Attachment B, which penetrate the proposed injection zone. Such data shall include the following:

A description of each well's type, construction, date drilled, location, depth, record of plugging and/or completion, and any additional information the Director may require. In the case of a new injection well, include the corrective action proposed to be taken by the applicant under 40 CFR 144.55.

RESPONSE

Corrective Action

A corrective action plan is not required for any of the artificial penetrations within the AORs of the proposed Dewey-Burdock wells or the Class V permit area because there are no artificial penetrations to the injection zone within the Class V permit area. If a corrective action plan for any neighboring well becomes necessary in the future, it will be developed according to appropriate regulatory standards and guidelines.

The corrective action plan which would be proposed by Powertech should the potential for fluid migration to occur through the confining layer develop via any future well likely would include the following:

1. The impacted Dewey-Burdock Project Disposal Well will be shut-in.
2. The USEPA, Region 8 UIC Section and the SD DENR will be notified.
3. Following well shut-in, liquid 11e2 waste will be shipped to alternative permitted facilities for off-site treatment and/or disposal as necessary.
4. A contingency plan will be prepared as follows:
 - a. Locate well and identify present operator or owner, if any.
 - b. Identify mode of failure.
 - c. Prepare remedial plan outlining course of action.
 - d. The remedial plan will be submitted to the USEPA, Region 8 and SD DENR for approval.
 - e. Upon authorization, the remedial plan will be implemented.

Water Wells within AORs

Table C-1 is a tabulation of the known artificial penetrations (water wells) located within the Class V permit area. The deepest formation penetrated by any of these wells is the Unkpapa/Sundance. Due to the absence of wells within the Class V permit area that penetrate either of the targeted injection zones, there is no potential from artificial penetrations for causing any endangerment to a USDW.

Area of Review Oil and Gas Well Data

Table C-2 is a tabulation of the three oil and gas wells permitted within the Dewey-Burdock Project area that are outside the assigned AORs. The plugging records for these wells are included as Appendix B. Plugging records obtained from DENR indicate that each of the wells is plugged to a sufficient depth so as not to allow transmission of fluids from the targeted injection zones to overlying USDWs. Note that none of these wells are located within the proposed Class V permit area. As such, they will not be encompassed in any prospective future AORs of proposed additional Dewey-Burdock Disposal Wells.

TABLE C-1 Known Water Wells Within Class V Permit Area

Well ID	Well Depth (ft)	Formation	Abandoned	Depth to Water (ft)
605	Unknown	Inyan Kara	no	Unknown
606	Unknown	Lakota	yes	0
42	600	Lakota	no	-10
61	525	Lakota	unknown	Unknown
16	330	Lakota	no	158
618	Unknown	Unknown	no	Unknown
15	495	Lakota	yes	0
634	Unknown	Unknown	yes	Unknown
43	350	Lakota	yes	Unknown
14	470	Lakota	unknown	-1
636	Unknown	Unknown	yes	Unknown
637	Unknown	Unknown	no	Unknown
17	156	Fall River	no	Unknown
39	Unknown	Unknown	unknown	Unknown
652	280	Inyan Kara	yes	Unknown
654	Unknown	Inyan Kara	yes	Unknown
659	Unknown	Fall River	yes	Unknown
660	Unknown	Lakota	yes	Unknown
661	Unknown	Lakota	unknown	Unknown
663	550	Lakota	unknown	Unknown
664	360	Fall River	unknown	Unknown
665	252	Fall River	unknown	Unknown
666	441	Lakota	unknown	Unknown
669	550	Lakota	unknown	Unknown
670	395	Fuson	unknown	Unknown
671	350	Fall River	unknown	Unknown
672	376	Fall River	unknown	Unknown
673	440	Fuson	unknown	Unknown
674	570	Lakota	unknown	Unknown
676	23	Alluvial	no	Unknown
683	650	Fall River	no	5
687	608	Fall River	no	Unknown
685	595	Fall River	no	Unknown
682	460	Lakota	no	Unknown
686	428	Lakota	no	Unknown
684	423	Lakota	no	Unknown
690	623	Unkpapa/Sundance	no	-29
692	327	Lakota	no	Unknown
38	494	Lakota	no	-14
609	1000	Lakota	no	7
610	Unknown	Fall River	no	Unknown
619	280	Lakota	no	19
628	Unknown	Inyan Kara	no	Unknown
668	574	Inyan Kara	no	Unknown
698	205	Fall River	no	Unknown
704	955	Unkpapa/Sundance	no	Unknown
703	525	Unkpapa/Sundance	no	Unknown
695	508	Fall River	no	Unknown

TABLE C-1 Known Water Wells Within Class V Permit Area

Well ID	Well Depth (ft)	Formation	Abandoned	Depth to Water (ft)
697	682	Lakota	no	Unknown
691	505	Fall River	no	Unknown
693	910	Unkpapa/Sundance	no	-138
689	730	Lakota	no	-59
681	600	Fall River	no	-13
49	600	Fall River	no	Unknown
688	255	Fall River	no	37
680	436	Lakota	no	39

Source: 2009 Powertech Dewey-Burdock NRC Application

TABLE C-2 Oil and Gas Wells Within Project Area

Well API	Name	Well Depth (ft)	Formation	Well Status
40-047-05095	Earl Darrow #1	2,450	Minnelusa	Plugged and Abandoned
40-047-20071	#34-11 Peterson	2,250	Minnelusa	Plugged and Abandoned
40-047-20065	Lenore Peterson #21-14	2,266	Minnelusa	Plugged back to 850'