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EPA MAY PUSH STATES FOR STIFF DRILLING WASTE RULES, ENFORCEMENT

Robinson, Robin. **Journal Record** [Oklahoma City, Okla] 07 Oct 1987.[Full text](#)[Abstract/Details](#)▲
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The federal agency is conducting a study of the handling of oil and natural gas drilling and production wastes by the states. The study must include the agency's analysis of the sources and volume of the wastes generated annually, the current disposal practices and their alternatives and the potential danger and documented cases of proved danger to human health and the environment from the surface run-off and leachate. In addition, the cost and impact of the alternatives on exploration and production of crude oil, natural gas and geothermal energy must be analyzed.

Oklahoma's centralized disposal pits for drilling cuttings could be affected, [William Bryson] said, because the EPA wants more pre-treatment of the drilling waste before it is disposed in the pits. In addition, those pits aren't sealed.

If the drilling wastes were upgraded to hazardous wastes, the disposal wells used to reinject some of the waste back into the formation that produced it would also have to be upgraded, Bryson said.

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The Environmental Protection Agency may push for stiffer state regulation of drilling waste and stiffer state enforcement of those regulations even while it backs away from redefining drilling wastes as hazardous substances.

That was the warning given by William Bryson, the **Interstate Oil** Compact Commission representative on an EPA task force, to members of the Oklahoma-Kansas Division of the Mid-Continent Oil & Gas Association.

The federal agency is conducting a study of the handling of oil and natural gas drilling and production wastes by the states. The study must include the agency's analysis of the sources and volume of the wastes generated annually, the current disposal practices and their alternatives and the potential danger and documented cases of proved danger to human health and the environment from the surface run-off and leachate. In addition, the cost and impact of the alternatives on exploration and production of crude oil, natural gas and geothermal energy must be analyzed.

The study has narrowed its scope down to 13 crude oil- and natural gas-producing states, from 21 that were originally considered.

Bryson is a member of the 20-member task force assisting the federal agency in the study. Other members are representatives of the states of Kansas, Texas and Alaska, and the federal Departments of Interior, Energy and Commerce, among others.

Among the stiffer standards that might make their way into the final report are required liners for reserve pits, Bryson said.

Because the requirements for disposal of the drilling wastes are controlled by state agencies, the regulations are different.

Oklahoma's centralized disposal pits for drilling cuttings could be affected, Bryson said, because the EPA wants more pre-treatment of the drilling waste before it is disposed in the pits. In addition, those pits aren't sealed.

The federal agency wants to classify hauling the salt water that is produced with oil for disposal at an injection well a few miles away as transportation, requiring more stringent regulations. This could strongly affect Oklahoma oil and natural gas producers with wells that produce large quantities of salt water.

If the drilling wastes were upgraded to hazardous wastes, the disposal wells used to reinject some of the waste back into the formation that produced it would also have to be upgraded, Bryson said.

Bryson, who is from Kansas, said the EPA asked the state for an average injection pressure in the state. Kansas has about 80 formations that will accept saltwater and each has a different pressure. No one pressure would be typical of most of those formation pressures, he said.

To compare the costs of the industry complying with possible agency regulations upgrading disposal wells, the agency determined that the economic limit of a well at the present time, at a price of \$19 per barrel, is about \$2.28.

If the agency decided to require upgraded disposal wells, the economic limit would rise by a small fraction.

However, if the agency were to recommend that the industry lose its exemption from the **Resource Conservation and Recovery** Act the economic limit would rise to a minimum of 7 barrels per day, Bryson said.

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