



JOHN BEL EDWARDS
GOVERNOR

State of Louisiana
DEPARTMENT OF NATURAL RESOURCES
OFFICE OF CONSERVATION

THOMAS F. HARRIS
SECRETARY

RICHARD P. IEYOUB
COMMISSIONER OF CONSERVATION

MEMORANDUM

DATE: February 3, 2020

TO: Richard P. Ieyoub, Commissioner
Office of Conservation

FROM: Stephen H. Lee, Director
Injection and Mining Division

SUBJECT: IMD-GS-09 and IMD-GS-09, Amendment 1, Determination Of A Maximum Allowable Surface Injection Pressure for Class II Saltwater Disposal and Enhanced Oil Recovery Wells By Applying The Provisions Of LAC 43:XIX.405.B.4 To The Confining Zone

On March 24, 2009, this Office adopted Injection and Mining Division Guidance Policy No. IMD-GS-09 adopting an alternative interpretation of LAC 43:XIX.405.B.4 providing that the calculation of the maximum allowable injection pressure (MASIP) could be applied to the confining zone instead of the injection zone resulting in higher injection pressures if geomechanical information on the confining zone could be identified.

Applicants who do not provide geomechanical data of the confining zone so that the fracture gradient can be determined, will have the well's MASIP calculated as stated in Policy No. IMD 1999-03, effective March 1, 1999.

Applicants who provide geomechanical data of the confining zone will have the well's MASIP calculated as interpreted in LAC 43:XIX.405.B.4 and will comply with the control measures listed below to assure protection of the lowermost underground source of drinking water (USDW).

On February 15, 2017, this Office revised IMD-GS-09 by issuing IMD-GS-09, Amendment 1 to address shortcomings of the original IMD-GS-09, most notably requiring operators to re-apply for the increased pressures at least every 5 years.

Upon fulfillment of the requirements of this policy, the applicant shall be granted a MASIP based upon the fracture pressure of the confining zone for a period up to 5 years. At any time during the term granted, the commissioner may require a re-evaluation of the MASIP. If it is determined that continued injection poses a risk to the USDW, oil and gas drilling and production, other

injection operations, or the health, safety, and welfare of the general public, the commissioner shall administratively revoke the existing MASIP and issue a new MASIP based upon the re-evaluation.

A review of IMD-GS-09 and IMD-GS-09, Amendment 1 in light of the provisions of Statewide Order 29-B, Chapters 4 and 5 (LAC 43:XIX.Subpart 1) indicate that the issuance of any increased MASIP should be evaluated on a case by case basis as is currently provided in Statewide Order 29-B.

Therefore, effective immediately Policy No. IMD-GS-09 and IMD-GS-09, Amendment 1 are revoked, null and void for the issuance of any new MASIPs.

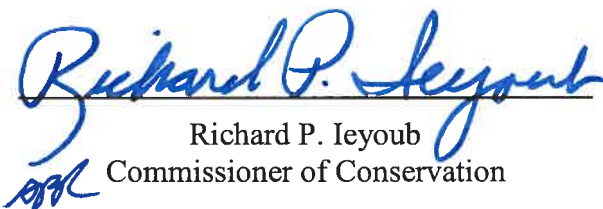
For any Class II wells previously issued an increased MASIP pursuant to Policy No. IMD-GS-09 and IMD-GS-09, Amendment 1, such wells may continue to operate under the provisions and requirements of IMD-GS-09, Amendment 1 and Policy No. IMD-GS-11 until February 15, 2022.

Any increased injection pressures (MASIP) issued after the effective date of this memorandum shall be in conformance with the current regulatory requirements of Statewide Order 29-B, Chapter 4 (LAC 43:XIX.Subpart 1) or successor applicable regulations.

APPROVED BY:



Stephen H. Lee, Director
Injection & Mining Division



Richard P. Ieyoub
Commissioner of Conservation