

Recertification CARD No. 33
Consideration of Drilling Events in Performance Assessments

BACKGROUND

Section 194.33 requires the U.S. Department of Energy (DOE or Department) to make specific assumptions about future deep and shallow drilling in the Delaware Basin. In conducting its analysis, DOE must incorporate assumptions specified in the U.S. Environmental Protection Agency's (EPA or Agency) Compliance Criteria regarding timing and duration of drilling, frequency of drilling, drilling practices and technology, and the effects of natural processes on boreholes.

Drilling in the near future within the Delaware Basin will most likely be for oil and gas exploration/exploitation, which constitutes a deep drilling event. Shallow drilling may occur for other resources (e.g., water). Drilling is incorporated in the performance assessment as a single event or combinations of events based upon different scenarios. Deep and shallow drilling rates and related activities directly affect the cumulative potential for radionuclide releases to the surface or to subsurface geologic units around the Waste Isolation Pilot Plant (WIPP).

Deep drilling is defined by EPA as events that terminate 2,150 feet or more below ground surface, while shallow drilling events terminate no deeper than 2,150 feet below ground surface.

REQUIREMENTS

(a) "Performance assessments shall examine deep drilling and shallow drilling that may potentially affect the disposal system during the regulatory time frame."

(b) "The following assumptions and process shall be used in assessing the likelihood and consequences of drilling events, and the results of such process shall be documented in any compliance application:

(1) Inadvertent and intermittent intrusion by drilling for resources (other than those resources provided by the waste in the disposal system or engineered barriers designed to isolate such waste) is the most severe human intrusion scenario.

(2) In performance assessments, drilling events shall be assumed to occur in the Delaware Basin at random intervals in time and space during the regulatory time frame.

(3) The frequency of deep drilling shall be calculated in the following manner:

(i) Identify deep drilling that has occurred for each resource in the Delaware Basin over the past 100 years prior to the time at which a compliance application is prepared

(ii) The total rate of deep drilling shall be the sum of the rates of deep drilling for each resource.

(4) The frequency of shallow drilling shall be calculated in the following manner:

(i) Identify shallow drilling that has occurred for each resource in the Delaware Basin over the past 100 years prior to the time at which a compliance application is prepared.

(ii) The total rate of shallow drilling shall be the sum of the rates of shallow drilling for each resource.

(iii) In considering the historical rate of all shallow drilling, the Department may, if justified, consider only the historical rate of shallow drilling for resources of similar type and quality to those in the controlled area.”

(c) “Performance assessments shall document that in analyzing the consequences of drilling events, the Department assumed that:

(1) Future drilling practices and technology will remain consistent with practices in the Delaware Basin at the time a compliance application is prepared. Such future drilling practices shall include, but shall not be limited to: the types and amounts of drilling fluids; borehole depths, diameters, and seals; and the fraction of such boreholes that are sealed by humans.

(2) Natural processes will degrade or otherwise affect the capability of boreholes to transmit fluids over the regulatory time frame.”

(d) “With respect to future drilling events, performance assessments need not analyze the effects of techniques used for resource recovery subsequent to the drilling of the borehole.”

1998 CERTIFICATION DECISION

To meet the requirements of Section 194.33, EPA expected DOE’s Compliance Certification Application (CCA) to discuss how deep and shallow drilling is conducted in the Delaware Basin. DOE was expected to discuss the drilling rate for the past 100 years and methodology for calculating those rates for deep and shallow drilling. DOE was also expected to show how deep and shallow drilling was incorporated into the performance assessment.

DOE identified the following drilling-related activities as being present in the Delaware Basin and potentially near the WIPP (CCA Appendix DEL.5, Tables DEL-3 through DEL-7):

- ◆ Oil/Gas exploration/exploitation and extraction, including enhanced oil

recovery (shallow and deep drilling).

- ◆ Potash exploration/exploitation (shallow and deep drilling).
- ◆ Fluid injection related to oil/gas production (deep drilling).
- ◆ Sulfur coreholes (deep and shallow drilling).
- ◆ Hydrocarbon (gas) storage in geologic reservoirs, gas reinjection (deep drilling).
- ◆ Brine wells for solution mining (shallow drilling).
- ◆ Water supply wells (shallow drilling).
- ◆ Geothermal resources (deep drilling).

In the CCA, DOE identified oil and gas exploration/exploitation and water and potash exploration as the principal human activities that must be considered within the performance assessment. The remaining human initiated activities—such as exploration for geothermal energy, water supplies, and sulfur and brine extraction (solution mining)—were eliminated based upon low probability, low consequence, or for regulatory reasons. See 2004 Compliance Recertification Application (2004 CRA) CARD 32—Scope of Performance Assessments for additional information on features, events and processes considered in the performance assessment.

DOE considered three different combinations of deep drilling as part of the PA, referred to as E1, E2, and E1E2:

- ◆ The E1 Scenario—one or more boreholes penetrate a Castile brine reservoir and also intersect a repository panel.
- ◆ The E2 Scenario—one or more boreholes intersect a repository panel.
- ◆ The E1E2 Scenario—multiple penetrations of waste panels by boreholes of the E1 or E2 type, at many possible combinations of intrusions times, locations, and E1 or E2 drilling events.

Drilling was assumed to occur throughout the 10,000 year regulatory time period, although at lower drilling rates for the first 700 years (See CCA CARD 33).

No combinations of shallow drilling events were considered by DOE, because DOE screened shallow drilling effects from consideration in PA based on low consequences.

DOE also presented information on borehole sizes and depths (CCA Appendix DEL.5), as well as the impacts of borehole installation on radionuclide migration and transport via

cuttings, cavings, spallings, and direct brine release.

EPA found that the documentation in the CCA demonstrated that DOE thoroughly considered deep and shallow drilling activities and rate within the Delaware Basin. DOE appropriately screened out shallow drilling from consideration in the performance assessment. EPA also found that DOE appropriately incorporated the assumptions and calculations for drilling in to the performance assessment. In accordance with 194.33(c), DOE evaluated the consequences of drilling events assuming that drilling practices remain consistent with practices in the Delaware Basin at the time the CCA was prepared.

A complete description of EPA's 1998 Certification Decision for Section 194.33 can be obtained from Docket A-93-02, Items V-A-1 and V-B-2.

CHANGES IN THE CRA

In the 2004 Compliance Recertification Application (2004 CRA), DOE reexamined all aspects of deep drilling and shallow drilling. DOE reviewed the CCA assumptions related to timing and duration of drilling, frequency of drilling, drilling practices and technology, and the effects of natural processes on boreholes.

DOE confirmed that oil and gas exploration/exploitation, water and potash exploration (See Section 33.A.5 of CCA CARD 33 for a complete list) are still the principal human-initiated (HI) activities to be considered in PA (see 2004 CRA, Chapter 6, Section 6.2.5). DOE added solution mining for potash and other resources for consideration but then ruled it out of the PA based on regulatory requirements (Appendix PA Attachment SCR-5.2.2.3 and SCR-5.2.2.4).

DOE reconsidered the E1, E2, and E1E2 deep drilling scenarios and found these scenarios sufficient for PA analysis and did make changes for the 2004 CRA (see 2004 CRA, Chapter 6.3.2.2). DOE confirmed that cuttings, cavings, spallings, direct brine releases, and long-term releases mechanisms during and following drilling have not changed since the original CCA PA (see 2004 CRA, Chapter 6, Section 6.4.7).

The 2004 CRA, Chapter 6.2.5.2.2 and in 2004 CRA, Appendix PA, Attachment SCR-5.1.1.2.3, DOE discussed the shallow drilling rate. DOE noted that drilling information is reported annually in its Delaware Basin Drilling Surveillance Program Annual Report (DOE 2002). In 2002 DOE noted that the total number of water wells in the Delaware Basin decreased from 2,331 wells to 2,296 wells. DOE concluded that the shallow drilling rate is essentially the same as reported in the CCA (see 2004 CRA, Appendix PA, Attachment SCR, page 74). DOE also continues to eliminate shallow drilling from the performance assessment because of low consequence to the performance of the disposal system (see 2004 CRA, Appendix PA, Attachment SCR-5.1.1.2.3).

Through its Delaware Basin Drilling Surveillance Program (DBDSP) (See 2004 CRA, Appendix DATA, Attachment A), DOE monitors deep drilling events, namely, drilling practices, borehole sizes, drill depths, plugging and abandonment practices, casing designs, and others

drilling related parameters in the vicinity of WIPP (For specifics see 2004 CRA, Appendix DATA, Attachment A, page 1). DOE collects the types and number of boreholes drilled in the deeper Delaware Basin, Castile brine encounters, and other drilling related data (such as bit size, casing size, rotation speed, penetration rate, mud density, mud viscosity, collar diameter, collar length, number of collars, record of any air drilling done, number of plugs, plug length, water and CO₂ flooding used, gas storage activities, and solution mining for potash or other reasons) (see 2004 CRA, Appendix Data, Attachment A).

DOE again concluded for the 2004 CRA that inadvertent and intermittent drilling is the most severe human intrusion scenario and included it in the performance assessment (see 2004 CRA, Chapter 6.0.2.3, page 6-7). DOE continued to include hydrocarbon exploratory and development wells in its analysis (see 2004 CRA, Appendix DATA, Attachment A, Table DATA-A-1). In the 2004 CRA performance assessment, DOE continued to include scenarios for human intrusion and calculated cumulative radionuclide releases assuming different intrusion events and combination of events (see 2004 CRA, Chapter 6, Sections 6.2.2.3, 6.2.5, and 6.3.2). DOE also continued to consider five potential release mechanisms in the 2004 CRA PA: (cuttings, cavings, spallings, direct brine releases, and long-term release mechanisms (see 2004 CRA, Chapter 6.0.2.3 and 6.4.7).

The 2004 CRA performance assessment adopted the performance assessment verification test (PAVT) parameter values used for borehole plug configuration permeabilities, for the probabilities of a borehole intersecting a brine reservoir, the Castile bulk compressibility range, the effective porosity, and the total volume of Castile brine (see 2004 CRA, chapter 6, pages 6-141, 6-143, 6-143).

DOE changed the future drill rate from 46.8 boreholes per square kilometer per 10,000 years to 52.5 boreholes per square kilometer per 10,000 years because of increased drilling for oil and gas in the Delaware Basin since the CCA (see 2004 CRA, Chapter 6.0.2.3 and Appendix Data, Attachment A, page 3). The future drilling rate is expected to continue to increase for a number of years because of the continued increase in oil and gas exploration and development in the Delaware Basin. DOE continues to assume that current drilling practices continue unchanged into the future as required by Section 194.33(c)(1) (see 2004 CRA, Chapter 6.0.2.3).

Based on DOE's Delaware Basin surveillance program, DOE modified the probability of occurrence for each borehole plug configuration (see 2004 CRA, Appendix PA, Attachment MASS-16.3.2; Appendix DATA, Attachment A, Table DATA-A-7; and WRES 2003, Attachment C). DOE changed the probability of occurrence for the continuous plug to 0.015, for the two-plug configuration to 0.289, and the three-plug configuration to 0.696 based on the observations of the Delaware Basin surveillance program.

EVALUATION OF COMPLIANCE FOR RECERTIFICATION

EPA reviewed DOE's 2004 CRA documentation of continuing compliance with Section 194.33. EPA reviewed 2004 CRA. Chapter 6, CRA Appendix PA, and 2004 CRA, Appendix

Data – in particular Appendix Data, Attachment A. EPA agrees that little has changed since the original CCA for the consideration of drilling events. DOE adopted EPA's PAVT parameter values and updated a few parameters based on its basin monitoring program.

EPA also agrees that the feature, events, and processes (FEPs) have had little change in the 2004 CRA. DOE separated FEPs H58, Solution Mining for Potash and H59, Solution Mining for Other Resources from the original FEP H13, Potash Mining because of solution mining's importance during the original CCA. However, solution mining was screened out in DOE's 2004 CRA FEP review. Air drilling, which was an important issue to commenters during the original CCA, has been monitored and reviewed by DOE and has been shown not to be a present practice near the WIPP.

EPA evaluated the resources considered by DOE in the 2004 CRA identified Chapter 2.3.1 and Appendix DATA, Attachment A, and verified them by comparing them to resources in the area. EPA agrees that there have been no significant changes since the original CCA review. Once again DOE considered the full spectrum of inadvertent and intermittent HI scenarios as done in the CCA PA. EPA finds that DOE adequately demonstrated that it had considered inadvertent and intermittent drilling into the repository as the most severe HI scenario for the 2004 CRA PA. EPA concludes that exploratory and development wells were appropriately included in DOE's 2004 CRA analysis.

Since the original CCA, EPA has annually inspected DOE's site monitoring program, in particular the Delaware Basin drilling surveillance program (see 2004 CRA, CARD 21 Inspections). Each year EPA found DOE's monitoring program to be adequate. EPA found DOE's compliance with the requirements of 40 CFR 194.33(4) related to shallow drilling to be adequate. EPA found DOE's documentation adequate to support their conclusion that drilling practices have not changed since the original CCA, that DOE's basin surveillance program is sufficient to evaluate and capture any changes in activities in the basin, and that three parameters needed to be updated because of additional wells drilled in the Delaware Basin.

EPA agrees that borehole plugging techniques used in the CCA and 2004 CRA PAs have not changed and therefore the way these are incorporated into the PA calculations is appropriate. EPA also agrees that the minor change in the occurrence probability of plug configurations is appropriate and is of no consequence to PA results.

Public comments expressed concern that the drilling rate was underestimated in the 2004 CRA's performance assessment calculations given the amount of drilling that is currently taking place throughout the Delaware Basin. Commenters suggested that the drilling rate be doubled to demonstrate compliance. Although EPA determined that DOE appropriately calculated and implemented a drilling rate of 52.2 boreholes/km²/year in compliance with Section 194.33 (b) for recertification, EPA requested that DOE calculate the impacts of doubling the current drilling rate to respond to stakeholder concerns.

DOE performed the calculations for this analysis by assuming the drilling rate was increased to 105 boreholes per square kilometer per year for 10,000 years. The results of

computer modeling showed that doubling the drilling rate would increase releases from the repository. However, this increase is relatively small and still well below EPA's regulatory release limits (see 2004 CRA, CARD 23).

RECERTIFICATION DECISION

Based on a review and evaluation of the 2004 CRA and supplemental information provided by DOE (FDMS Docket ID No. EPA-HQ-OAR-2004-0025, Air Docket A-98-49), EPA determines that DOE continues to comply with the requirements for Section 194.33.