CLASS I FILE REVIEW FORM and FIELD INSPECTION COMPLIANCE REPORT

USEPA Region 5 - Underground Injection Control Branch

Region 5 inspector: Harlan Gerrish, w/Leslie Patterson Signature:

Facility Name: Northeastern Exploration, Inc.; Davis #1-19

Facility representative accompanying inspector:

Date of inspection: 08/31/2005 Date of most recent inspection: 08/25/98

Number of active wells (of same class/type) on site: 1

UIC Well Permit #: MI-119-1I-C002 (prev MI-119-2D-0001)		Issuance Date: 07/15/2005
Well Completion Date: 04/05/83 (converted to Class II 02/10/86, Class I on 05/12/97)	Expiration Date: 08/15/2015	Effective Date: 8/15/2005

Permit Limitations/Requirements

Max Surface IP (IP=Injection Pressure)	150 psig
Specific Gravity used in Max IP Calculation	1.25
Annulus Pressure	100 psig minimum
Differential Pressure	100 psig min above OIP
Volume Limitation (e.g. Combined monthly average flow rate, monthly volume, etc.):	None specified

Compliance Summary (since last inspection)

Description of Alleged Violation or other problem	When?	Is it fixed?	If fixed, when?
(As a Class II well) Failure to submit monthly reports	09/09/1996		
(As a Class II well) Failure to report specific gravity	09/09/1996		

Since the previous inspection, has advance written notice of other noncompliance been provided from the permittee to USEPA? **Yes** ____ **No** ____ **N/A** ____

If yes, what was the nature of the noncompliance?

CI on 04/23/04; ATI on 04/30/04

Well Completion/Construction

Are any physical alterations or additions to the facility planned (including surface facilities, hydraulic fracturing, or other well stimulation)? **Yes** ____ **No** __x__
If **yes**, please list below:

They just did the casing; tubing & packer are new as of last June so nothing planned now.

Inspector: attach most current well diagram (e.g., plugging and abandonment form)

Mechanical Integrity Testing and Ambient Pressure Monitoring

	Date	Results	Next one due on:
Last Part I MIT (e.g., SAPT; Water-Brine Interface)	4/26/2005	PASS	04/26/2006
Last Part II MIT (e.g., temperature survey, oxygen activation log, noise log, other)	5/12/2003	PASS	05/12/2008
Last Radioactive Tracer Survey			
Last Ambient Reservoir Pressure Monitoring (e.g., fall-off test or static bottom hole measurement)	4/26/2005	PASS	04/26/2006

Closure/P&A & Post-Closure

Does plugging and abandonment plan need to be updated? **Yes** ____ **No** _x_

~~Most recent closure & post-closure cost estimates (hazardous waste wells only)~~
~~Date submitted~~
~~Submitted on time? **Yes** ____ **No** ____~~
~~Cost of Closure ____ $~~
~~Cost of Post-Closure ____ $~~

Financial Assurance Type of Mechanism State Bond with MDEQ and Trust Agreement
Dollar amount (if applicable) $ 5000 and $10,000
Date submitted/updated unknown, 01/14/1993
Is amount of financial assurance still adequate? **Yes** _x_ **No** ____

Does the plugging and abandonment form need updating? **Yes** ____ **No** _x_

Waste Analysis Plan: Waste Stream Analysis

		Yes	No
1	Have any process or operating changes occurred that may significantly alter the characteristics of the waste stream? (146.68(a)(2))		x
	If yes, briefly describe the change		
	Date changes implemented:		
	Date waste stream first sampled after this change:		
2	Choose a wastestream sampling event since the previous inspection. Do onsite records contain the following information **(WAP)**?		
	a. Sampling events reviewed: COA #MI-0501134-01 01/21/05		
	b. Date sample collected?	x	
	c. "Exact place" of collection?		x
	d. Time of sampling?	x	
	e. Name of sampler?		x
	f. Sampling method? (ref. to WAP is acceptable)	X	
	g. A complete Chain of Custody included?	X	
	h. Date of analyses/measurements included?	X	
	i. Were analytical methods listed in records?	X	
	j. Are analytical methods same as those listed in WAP?	X	
	k. Were analytical results listed in records?	X	
	l. Does original submittal from lab match the analytical results listed in MOR?	X	
	m.Are all parameters sampled that are specified in WAP?	X	
	n. Do sampling and analysis comply with specifications of the WAP? (Permit Part I(E)(10))	X	
	o. Name/initials of analyst included?	X	
	p. Laboratory that performed analysis identified in records?	X	

Continuous Monitoring/Recording (Historic)

		Yes	No
1.	Are continuous monitoring records (e.g. strip charts) retained on-site?	X	

2. Review continuous monitoring records (e.g. strip charts) for a specified time period, e.g. one month. Choose Permit Parameter (e.g. max IP, DP, min AP, Flow, pH, Specific Gravity, NonOp. Periods, etc.)

Time Period #1: 05/05/05

Parameter	MOR value	Cont. monitoring value	Acceptable?		Permit limitation	Within Permit Limit?	
			Yes	No		Yes	No
Injection Pressure	-10	-12.5 to -9.5	x				
Differential Pressure		430 to 440	X		>100	X	
Annulus Pressure	380						
Annulus fluid level	3 ft						

"Acceptable" here means that the value from the submitted MOR matches the value from the continuous monitoring recording.

Time Period #2: 03/09/05							
Parameter	MOR value	Cont. monitoring value	Acceptable?		Permit limitation	Within Permit Limit?	
			Yes	No		Yes	No
Differential Pressure		~280	X		100 psig above OIP	x	
Injection Pressure	-12	~-12	X		150 psig		
Annulus Pressure	285						
Annulus fluid level	3 ft,						

According to the records reviewed:	Yes	No
Has minimum permitted Differential P (or Annulus P) been maintained?	x	
Has maximum permitted Injection Pressure been exceeded?		x
Are all required parameters monitored continuously?	x	
Highest injection pressure noted on charts: -9.3 psig		
Any anomalies or spikes noted on charts?		x
3. a. During periods where continuous monitoring equipment is inoperative, is an appropriate back-up procedure in place?		
b. Please specify method of back-up, frequency of recordings, etc. Solar back up to power the equipment, also battery backup; any outage causes monitors to come out and check the system.		
4. Are monitoring, calibration, and maintenance records, original charts from continuous monitoring instruments and copies of required reports maintained for at least five years or for the life of the well, whichever is longer (see below)?	x	

5. Document	Date of Latest Document	Calibration Frequency
a. calibration records: pH meter	Measured by C. Brown	
pressure gauge verification	06/21/05	yearly
transmitters	N/A	
b. maintenance records		
c. strip charts (continuous monitoring)	July 2005	None

	Yes	No
6. Have records concerning the nature and composition of all injected fluids been retained to date? (required to be retained three years after P&A)	x	

Maintenance (Personnel & Injection System)

1. Training required by facility for Class I Well Operators:

Type/Name of Training	Job Titles of Trainees	Frequency	Most Recent
Deepwell Operator Training by Ken Cooper of Petrotek	Dennis Hall		May 1998
	Paul Husted		
	Kathleen Hall		

2. Does this type/amount of training appear adequate for operators? **Yes**

If no, additional training recommended:_____

Automatic Warning and Shut Down System

	Automatic Alarm		Automatic Shutdown		Comments
System Present?	Yes		Yes		Automatic phone calls to 3 different places
Pressure at which system is programmed to be tripped at:	100 psi-IP 125 psi-AP				

Field Readings

Required operating parameters, recorded on the day of the inspection, at wellhead gauges, computer, and strip chart(s) are listed on the site-specific form.

Well Status: Active __x___ Shut In _____ Other _____

Operating Condition	Gauge Reading	Recorder Reading
Tubing Pressure (psi)	-8.2	-8.3
Annulus Pressure (psi)	250 (4" face gauge, 1-1000psi range)	210 psi
Flow Rate (show units)	196 gpm	207 gpm
Cumulative Volume (units)	Monthly ~178,813	
Sight Glass Level	4' 2.5"	
Inj. temperature (°F)	NR	
pH	NR	
Other:		

Was permit reviewed with operator:		No
Any issues identified? No		

What instruments are used to create the MORs (e.g., gauge readings from wellhead, computer system, continuous monitoring charts, etc.)
Digital data are collected at 30 second intervals by Kimroy recorder. These are used for MORs. Strip charts are independently operatred. They appear to be operational and relatively accurate but correlations to digital data was not possible given knowledge level of staff on site.

Locational information [GPS readings (in decimal equivalent)]

Latitude	
Longitude	
Description of location where readings taken	
Type of GPS equipment used	

Site Conditions

Photos Taken?		How many?
	No	Digital or film?
Wellhead Appearance	Clean, insulated shed. Equipment appears in very good condition.	
Annulus Tank System	(e.g. tank volume, tank setup, etc.) ~100 gal	
Monitoring Equipment	(e.g., gauge types & locations, cont. mon. equip.) Strip charts record injection and differential pressure. Digital data uploaded every 30 seconds.	
Injection Equipment	(e.g., pump types, etc.) Class II and Class I unloads on separate sides. Operates under vacuum.	

General Comments:
Records are kept orderly and are easily accessible. The on-site staff has good practices in the operating of the well and the monitoring and alarm systems appear to be sufficient to prevent and fix any problems. The operators are very familiar with the requirements of the permit, which is reflected in their operations.