



PROCEDURE FOR CONVERTING A NATURAL GAS STORAGE WELL TO MONITORING STATUS

Procedure #: UICLPG-10
(6/11)

Narrative:

The operator shall submit a plan for the conversion of a natural gas storage well to monitoring status to the Kansas Department of Health and Environment (KDHE) for review and approval. The operator shall not commence conversion procedures until KDHE has approved the plan.

The plan shall include the following:

- Cavern name and location
- Current capacity
- Cavern description
- A diagram of any necessary wellhead modifications
- Guidelines for conversion of the well to monitoring status (procedure)

Procedure:

1. Depressure the cavern by removing all product. Describe the procedure for removing product from the cavern, including any product trapped behind the casing.
2. Fill the well casing and cavern roof with saturated brine or blanket material approved by KDHE. The product casing surface pressure of 150-200 psig must be maintained.
3. Check weekly the wellhead pressures with readings from a continuous record made with an electronic device, electro-mechanical device or manual gauge. Notify KDHE immediately of a significant loss of monitoring pressure. Provide written confirmation as required by K.A.R. 28-45a-10. Make copies of gauge readings available to KDHE upon request.
4. Remove the product piping between the wellhead and brine and product header valves.
5. Install blind flanges on all wellhead valves. Install blind flanges or weld caps on brine and product piping.
6. Remove electrical and instrumentation equipment and pull equipment back to the nearest junction box.
7. Install a new, tested 0-200 psig gauge on the product casing. Verify pressure gauge accuracy quarterly with dead weight pressure measurements.
8. Report all activities, such as product injection and record date and volume.
9. Conduct regular testing requirements pursuant to K.A.R. 28-45a-14 and meet monitoring requirements pursuant to K.A.R. 28-45a-13.

10. Prior to placing cavern in service, conduct inspections and tests, including mechanical integrity testing as required by K.A.R. 28-45a-14.
11. Submit a plan for modifications to monitoring status to KDHE for review and approval prior to the commencement of modifications.
12. Submit an annual report to KDHE summarizing activities including required testing and monitoring reports. KDHE will review the monitoring status of the cavern and determine if cavern can remain in monitoring status or should be returned to service or plugged.

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