



Can I convert a Class II injection well to a Class I injection?

UICI-IP-3
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Question:

Can I convert a Class II injection well to a Class I injection well?

The straightforward answer is - **NO**. There are a number of reasons for this.

Regulatory Background:

The Kansas Department of Health and Environment (KDHE) regulation K.A.R. 28-46-25 – *Prohibition of Unauthorized Injection* - which states in part: *Class I injection wells shall not be constructed and underground injection shall not take place unless authorized by a permit issued by KDHE.*

Definitions:

Let's clarify what these injection wells are. The United States Environmental Protection Agency (US EPA) established the Underground Injection Control (UIC) Program back in the late 1970's when several incidents in different parts of the nation made it obvious that these wells can pose a threat to the public health and environment unless operated under strict controls. The EPA has authorized the (KDHE) to regulate Class I injection wells and has similarly authorized the Kansas Corporation Commission (KCC) to regulate Class II injection wells.

Discussion:

Class I and Class II injection wells each have their own set of specific regulations. Both programs are protective of the public health, safety, property and environment; but due to the industrial nature of the wastewater injected into the Class I wells, EPA believes these wells need additional scrutiny. A Class I injection well is used to inject industrial wastewaters into deep formations for the purpose of disposal. Class I disposal wells are only permitted for wastes which are not feasible to treat and dispose of by other means. There are a number of additional requirements for Class I wells. These requirements for a Class I well cannot be met if the well has already been installed.

The requirements for Class I injection wells can be found at the following website:
http://www.kdheks.gov/uic/class_1.htm

In summary, the stringent requirements for the installation of Class I UIC wells and the KDHE regulation K.A.R. 28-46-25 prevent a Class II injection well from being converted to a Class I injection well.