Describe Kansas Facilities

- Hydrocarbon storage
  - propane, butane, natural gas, gasoline
- Stored in salt formation
  - solution mined caverns, jugs
- 10 active facilities
  - 1 natural gas, 9 LPG
- Companies: Kansas Gas Service, Koch, Ferrellgas, NCRA, Texaco, Williams, Oneok
- 624 active wells, 159 plugged wells, 80 million bbls total Kansas storage
- 7 inactive facilities
Regulatory Program History

- Natural gas storage and LPG storage from 1950's
- Federal Safe Drinking Water Act, 1974 (UIC)
- KDHE regulations from 1981
- 1986, injection programs divided between KCC and KDHE
- KCC has oil field related waste brine disposal and production zone gas storage
- KDHE has industrial waste disposal, federal underground injection control w/o oil field, salt solution mining wells
- Related program is Underground Injection Control (UIC), from Federal Safe Drinking Water Act

History

- 5 types of injection wells addressed by UIC
  - Class 1, hazardous and non-hazardous waste injection (KDHE)
  - Class 2, oil field brine injection (KCC)
  - Class 3, salt solution mining (KDHE)
  - Class 4, hazardous waste into and above aquifers (illegal)
  - Class 5, others not covered above

- Hydrocarbon storage wells not covered by UIC, but are a state program
State Regulatory Authority

- KSA 65-171d(a), “protect the soil and waters of the state from pollution resulting from underground storage reservoirs of hydrocarbons and liquid petroleum gas”

- KAR 28-45-1 through 11

- KCC statutory authority, KSA 74-623, jurisdiction “except refining, treating, or storing of oil or gas after transportation ..”

Regulation Plans

- Update started in 1996

- Meetings with industry

- Hutchinson incident gives new priority to regulation update

- Staff temporarily assigned to regulation process