

"More people die from unsafe water than from all forms of violence, including war."

*– UN Secretary-General
Ban Ki-moon*







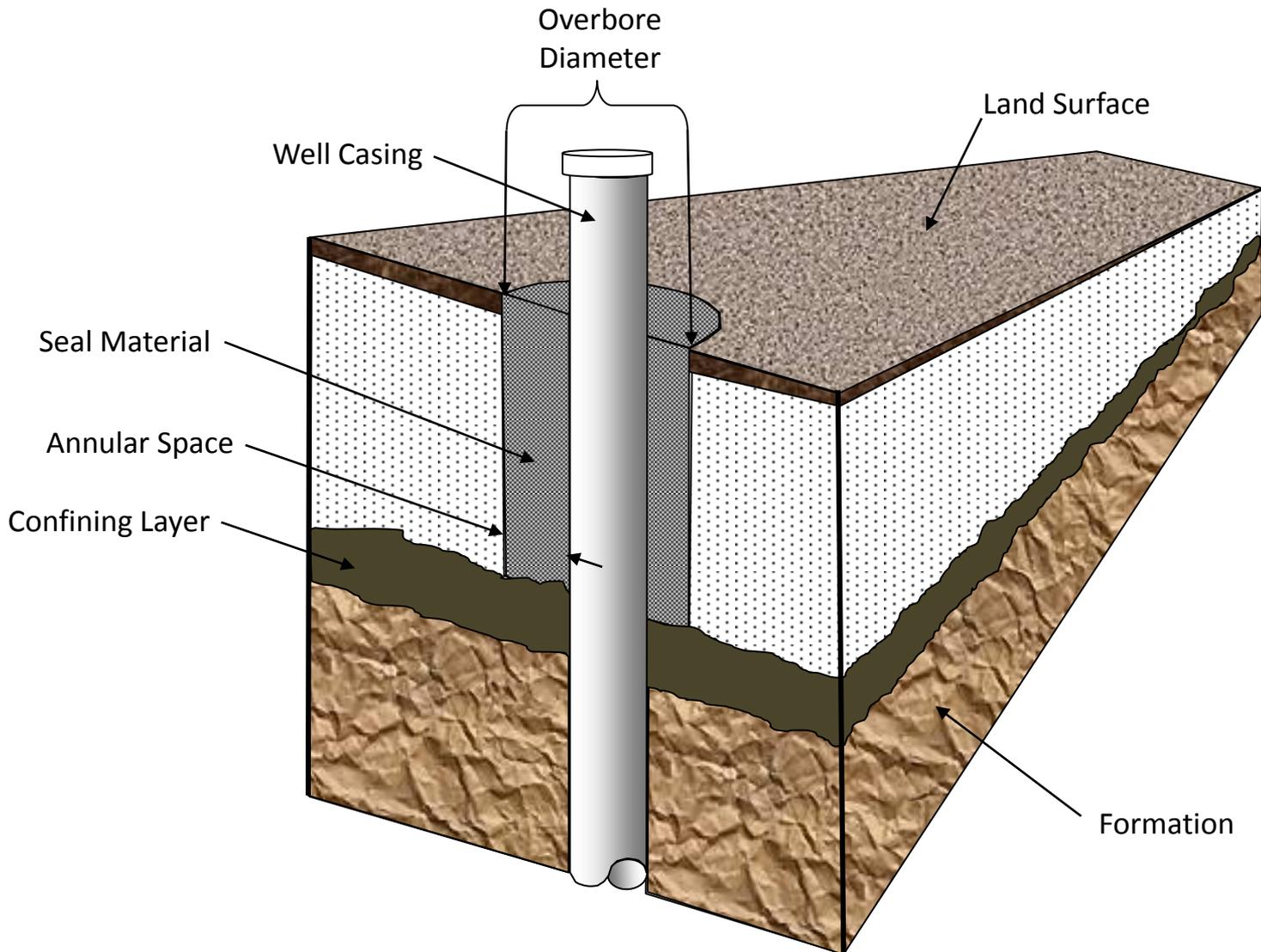
Current Well Construction Permitting

- Well construction permitting required - beginning in 1987.
- Permitting Process – In most areas of the state and for most drillers, drillers can pre-purchase ID tags that must be attached to the well casing.
- Driller activates a permit by notifying IDWR of commencement of construction.
- Immediate approval for most – **No waiting!**

Underlying Conditions for Streamlined Permitting

- Standard (minimum) surface seal depth that will most likely encounter a confining layer preventing migration of contaminants – usually clay. This surface seal depth is now 38 feet – it was once 18 feet.
- Opportunity for IDWR to inspect surface seal placement – notice of seal placement – currently four hours prior to placement

What is a Well Seal?





Artesian Waste: Lack of Proper Sealing



**Artesian
Water
Leaking
Upward
Along
Outside of
Casing**

Improper Seals



Importance of Surface Seal

- Ground water is limited
- Provides drinking water for 95% of Idahoans
- Human activity is source of most ground water quality degradation.
- Shallow aquifers near surface are most susceptible to contamination
- Ground water requires less treatment than surface water – no bacteria.
- Ground water is very difficult & expensive to clean up once contaminated.
- Ground water impacts surface water.

Well Construction Rules

- Promulgated in 2009
- Rules were a result of negotiated rule making with wide cross section of stakeholders lasting at least two years. There was much compromise from all participants.
- Rules increased surface seal depth from 18 feet to 38 feet.
- Rules require four hour notice before seal placement.

Waiver of Standard (Minimum) Surface Seal Depth

- Rules allow for individual waiver of standard surface seal depth upon request by driller and showing of geologic conditions justifying waiver.
- Rules allow for designation of larger areas where a different standard surface seal depth could be recognized. These areas would most likely need a somewhat uniform geology.

2013 Proposed Legislation

- Proposed reduction of surface seal depth from 38 feet back to 18 feet
- Proposed elimination of four hour notice requirement
- Proposed a different definition of the word “artesian.”

Well Construction Regulatory Initiative

As a result of concerns raised in the 2013 Idaho Legislature, the Department is evaluating the minimum surface sealing depths and regulatory process for waivers

Well Construction Regulatory Initiative

- Contract issued to Dr. Dale Ralston on June 19, 2013, to evaluate and peer review the Department well log study used to establish minimum surface seal depths
- Dr. Ralston to expand the well log study to better evaluate minimum surface seal depths
- Regional Department Staff evaluating local/regional geology regarding minimum seal depths

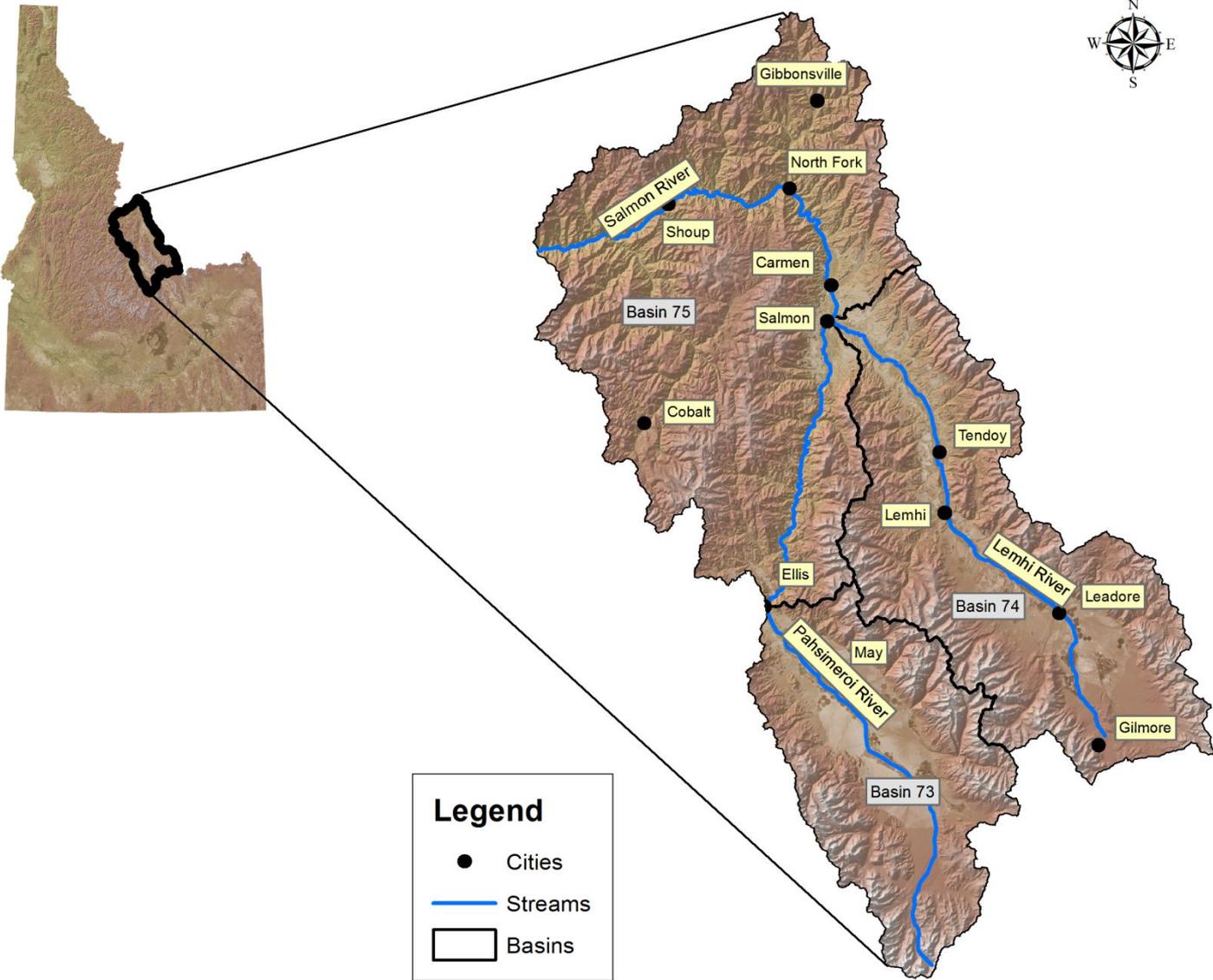
Well Construction Regulatory Initiative

- Department has placed waiver form on the website to provide access to drillers for applying for waivers. Complete on June 11, 2013
- Department working on guidance to regional staff regarding consistency of processing waivers. Target date September 15, 2013
- Drillers Advisory Committee to review and provide feedback on waiver guidance. Target date October 15, 2013

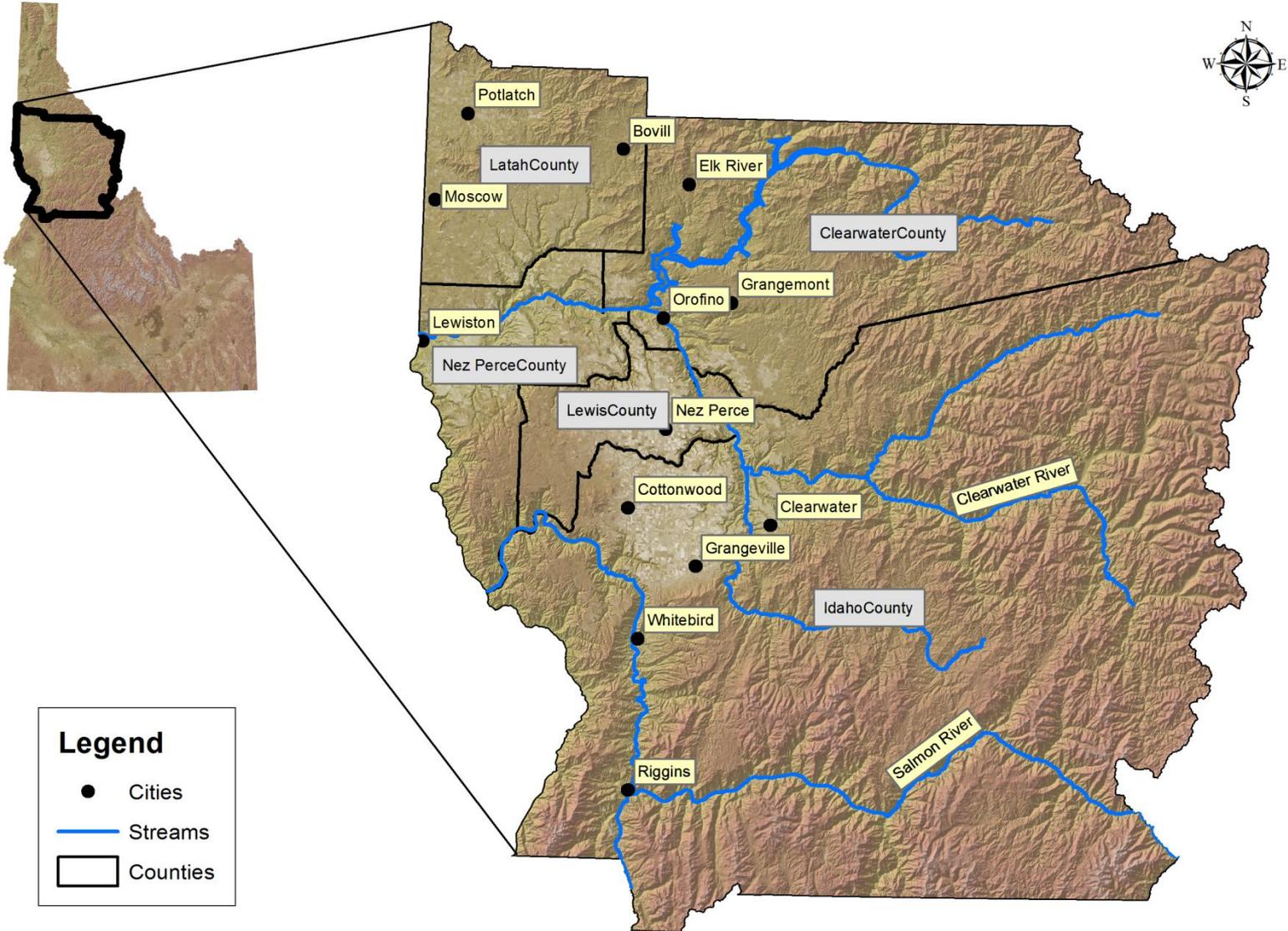
Well Construction Regulatory Initiative

- Contract issued to the Eastern Idaho Public Health District on May 13, 2013 in the Salmon area to assist with timely seal inspections
- Contract issued to the Public Health – Idaho North Central District in Latah, Clearwater, Idaho, Nez Perce, and Lewis Counties on May 13, 2013 to assist with timely seal inspections.

Salmon Area



Lewiston Area

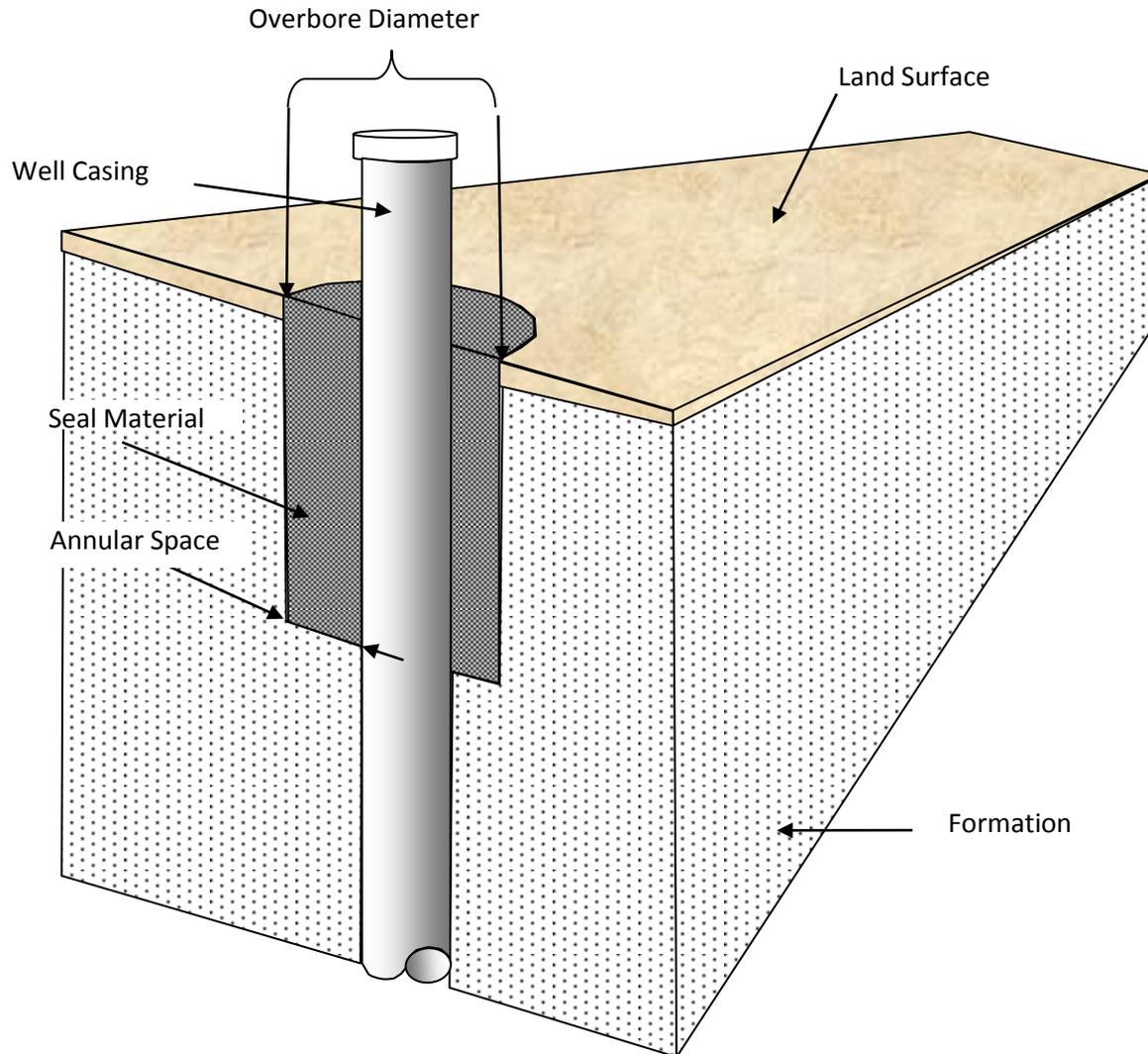


Well Construction Regulatory Initiative

- Guidance issued for the Regional Office implementation of the well construction and drilling licensing programs to promote statewide consistency. Guidance issued May 13, 2013.
- State office staff working more closely with Regional Offices to support consistency of inspections and enforcement of the well construction and driller licensing programs



What is a Well Seal?



Common Contaminants

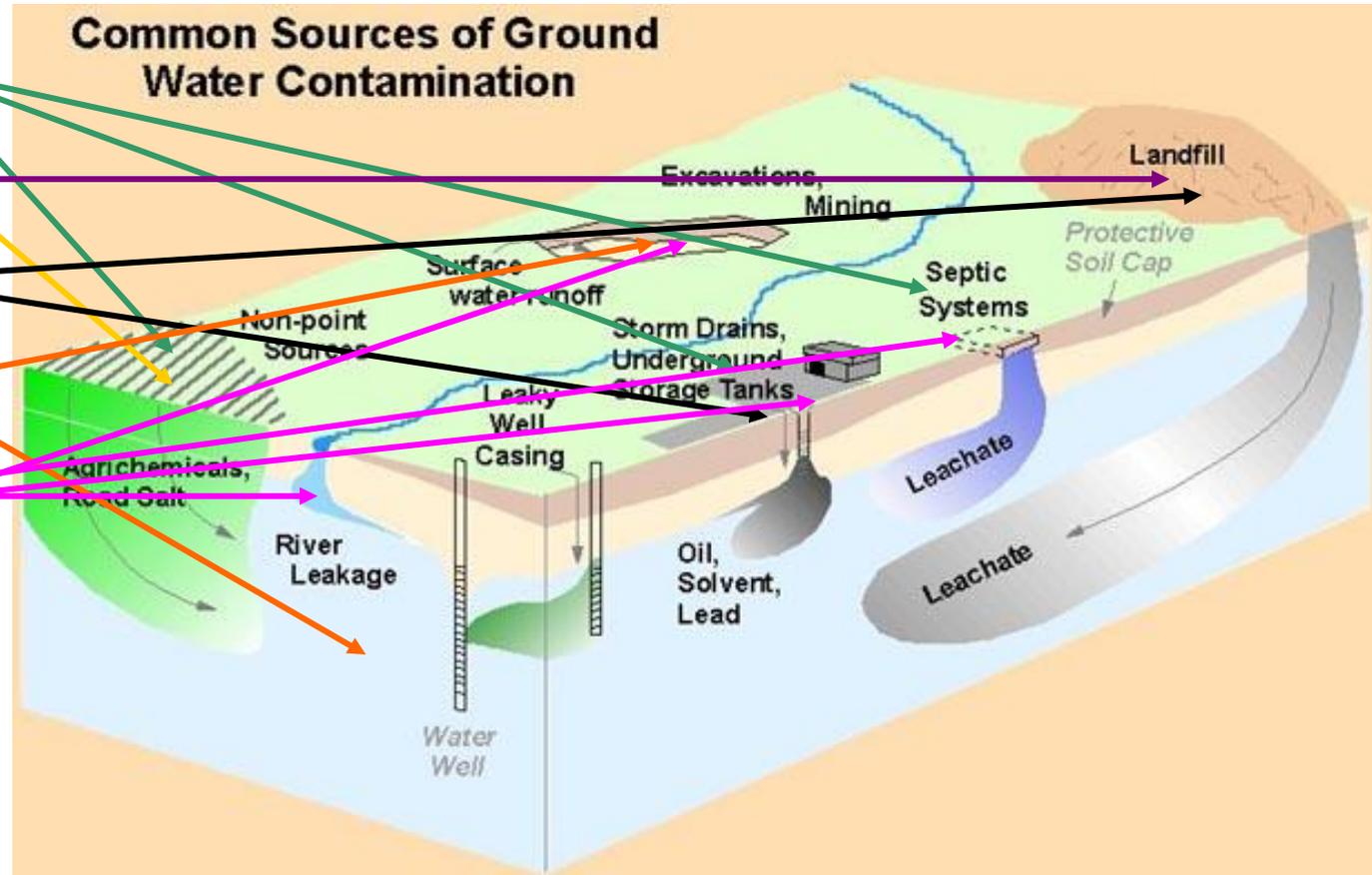
Nitrates

Pesticides

Petroleum

Arsenic

Biological



Biological Contaminants

- One exposure can cause illness
- Potential sources
 - Septic tanks
 - Sewer lines
 - Sewage lagoons – human
 - Waste lagoons - CAFOs
 - Surface water

