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A LOOK AT NEW SALT CAVERN RULES IN THE STATE OF LOUISIANA

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Abstract

New rules have recently been put in place for hydrocarbon storage wells in salt dome cavities and for solution-mining injection wells in the state of Louisiana. The new regulations were promulgated after the Bayou Corne sinkhole developed following the sidewall collapse of a plugged and abandoned brine production cavern well on the western edge of the Napoleonville Salt Dome in Assumption Parish, Louisiana.

The new rules are significantly more comprehensive than previous rules and put many new operational and regulatory demands on the owners and operators of cavern storage and brine production facilities.

The rules for hydrocarbon storage wells in salt dome cavities and solution-mined injection wells are part of Louisiana Administrative Code Title 43, Part XVII, Office of Conservation. These wells are under the jurisdiction of the Injection and Mining Division which is responsible for administering the United States Environmental Protection Agency (EPA) regulatory and permitting program. The hydrocarbon storage well regulations are covered in Subpart 3, Statewide Order No. 29-M (Rev. 3) and the solution-mined injection well regulations can be found in Subpart 5, Statewide Order No. 29-M-3. The rules were promulgated on February 20, 2014, approximately 1½ years after the sinkhole formed at the Napoleonville Dome, and were revised six months later on August 20, 2014.

This paper examines the new rules and highlights changes from previous rules. It also looks at the differences between the new rules for the hydrocarbon storage wells and the solution-mining wells and makes a comparison to regulations in neighboring states that have caverns. The impact of the new rules on cavern owners and operators will also be covered.

Keywords: Bayou Corne, cavern disposal, closure plan, Department of Natural Resources, hydrocarbon storage, Injection and Mining Division, legislation, Louisiana, Louisiana Legislative Session, Louisiana Register, mechanical integrity testing, Notice of Intent, Office of Conservation, post-closure monitoring, promulgated, public hearing, regulations, rules, salt dome cavern, sinkhole, site assessment, solution-mining, sonar survey, Statewide Order.

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