

## BLM Legacy Wells Safety and Environmental Compliance Issues

From 1944 to 1981, the Federal Government drilled numerous wells (called legacy wells) in northern Alaska. The Bureau of Land Management (BLM) in the Department of the Interior has become the operator of these wells.

All legacy wells are or have been out of compliance with multiple Alaska regulations.<sup>1</sup> Although by no means exhaustive, the following summarizes the most troubling issues<sup>2</sup>:

- Proper plugging and abandonment of wells is governed by Article 2 of the AOGCC's regulations, 20 AAC 25.105, et seq. The purposes of properly plugging and abandoning wells include public safety, protection of the environment, and protection of sources of drinking water.
- Proper plugging and abandonment of a well includes sufficient downhole cement and plugs to ensure that underground fluids cannot migrate. With few exceptions, none of the 137 legacy wells complies with this requirement.
- Proper plugging and abandonment of a well requires that all underground pipe be cut off 5 feet below ground level so that it cannot create an excavation hazard or become a problem during subsidence or other normal earth movement. With few exceptions, none of the legacy wells complies with this requirement.
- Proper plugging and abandonment of a well also requires sufficient surface remediation that the site blends in with the natural vegetation. Within a few seasons, there should be no surface indication of a well's location. Many of the legacy well sites are permanent eyesores, littered with rotting wood, rusting metal, and other debris.<sup>3</sup> Because the legacy wells have not been properly plugged and abandoned, those wells that are revegetated have potentially more serious downhole mechanical integrity issues.
- Delaying the plugging and abandonment has already caused several of the wells to be "lost" due to subsidence and other normal earth movement. Two wells are at the bottom of what subsidence and snow melt have now turned into lakes and a third has been buried in a landslide. Additional wells simply can no longer be found, with no explanation for why. Postponing abandonment of the remaining wells puts them at risk of also becoming "lost."

Allowing these unsafe and unsightly wells to litter Alaska's wilderness while threatening both public safety and the environment is unacceptable. Nonetheless, BLM has only plugged and abandoned approximately ten of the 137 wells.

If these wells were operated by an oil company, the AOGCC would force compliance with its regulations and impose fines for any non-compliance. While the AOGCC can find BLM to be in violation of AOGCC regulations, the AOGCC has no legal authority to force the Department of the Interior into compliance.

The Federal Government should provide adequate funding specifically designated for the purpose of bringing the legacy wells into regulatory compliance.

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<sup>1</sup> Given the condition of most of these wells, review of the applicable Federal regulations would likely reveal that the wells are out of compliance with those as well.

<sup>2</sup> Should greater specificity be desired, a separate paper, "Legacy Wells: Non-compliance with AOGCC Regulations," describes the non-compliance with AOGCC regulations in detail.

<sup>3</sup> Pictures of littered wellsites can be found in the BLM's Legacy Well Summary Report, on their website at [www.blm.gov/ak/st/en/progenergy/oil\\_gas/npra/legacywell.html](http://www.blm.gov/ak/st/en/progenergy/oil_gas/npra/legacywell.html)