

Monitoring Wells – Lost, But Not Forgotten

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Out of service wells must be decommissioned by a New Jersey licensed driller in accordance with N.J.A.C. 7:9D (Well Construction and Maintenance; Sealing of Abandoned Wells) as administered by NJDEP's Bureau of Water Allocation and Well Permitting (BWAWP). Until recently, there was no official process for administratively closing out monitoring wells that were not decommissioned according to the BWAWP rules. Individuals could submit information to BWAWP to document the condition of these wells; however, they would forever remain listed as "active" in NJDEP databases.

The June 2017, NJDEP "Guidance for Damaged, Destroyed, or Lost Wells", provides a path to closure for these wells. The well owner or their agent initiates the process by providing some basic information about the monitoring well to BWAWP in writing. This information includes the well owner's or responsible party's contact information, program interest number, location information, well permit number, and construction details. In addition, applicants must submit information about the circumstances leading to the loss of the well or, if a well can't be found, the efforts taken to locate it. Applicants are encouraged to provide photos, drawings, reports, agency correspondence, and other forms of documentation to support the narrative.

BWAWP will then evaluate the information and provide the applicant with a response letter. If BWAWP determines that further action must be taken to find or decommission the well, instructions for doing so will be provided in the letter. However, if BWA determines that sufficient action has been taken, the letter will serve as closure documentation for the well in lieu of a decommissioning report. It is important to factor this process into your timeline for issuance of final closure documents (RAO). We don't yet have data on the BWAWP's turnaround for these reviews.

Proper management may prevent monitoring wells from being lost or damaged in the first place. Accordingly, NJDEP has included recommendations in the guidance for protecting and maintaining wells. Recommendations include using proper well markers, installing barriers against damage, and keeping an accurate well inventory. In our efforts to protect human health and the environment, every LSRP should take steps to properly maintain monitoring wells on the sites that they manage. However, if our best efforts fail, there is now a well-defined way to address it.