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July 15, 2024

Erik Boe
Idaho Department of Water Resources
322 E. Front St.
Boise, ID 83720

Re: Comments on Well Construction Rulemaking

Erik,

Enclosed with this letter are some comments on the proposed changes to the Well Construction Standards Rules. I have listed them in order, referenced with the rule number and subsection.

Thank you for your consideration of my comments.

Sincerely,



Tom Richardson
H2O Well Service, Inc.

My comments on Well Construction Rule Changes:

Definitions Rule (10)

12. Casing- suggest adding "made of steel or PVC," remove "conduit."
 15. Conductor Pipe- not used in water well terminology, not used on well log. Suggest delete or move to a "Low Temp Geothermal" separate section.
 31. Intermediate String or Casing- not used in water well terminology, not used on well log. Suggest delete or move to a "Low Temp Geothermal" separate section.
 32. Liner- suggest adding "made of steel or PVC," remove "conduit."
 39. Pitless Adaptor or Pitless Unit- suggest deletion, as it is not part of well construction. If you leave it, the original definition is better as it relates to a pitless unit. A pitless unit does not install THROUGH the well casing, it is welded TO the well casing several feet below grade.
 41. Pressure Grouting- not always in the annular space, as in a decommission.
 43. Public Drinking Water System- why are we citing DEQ definition in well construction? Suggest renaming "Public Water Supply Well" and stating that it may require engineering and a Water Right, and must meet DEQ requirements based upon the number of users.
 51. Surface Casing- water well term used for the surface seal. See definition 52. Suggest using 52. definition here, or move to a "Low Temp Geothermal" separate section.
 52. Temporary Casing- suggest deletion.
 53. Thermoplastic/PVC Casing- "ASTM F 480" refers to the thread design on threaded PVC. Suggest "SDR 21" or "Schedule 40" for the definition.
 58. Unstable Unit- not a term used in the water well industry. Suggest deletion.
 63. Well- suggest delete "of any temperature"- not relevant to well description.
04. Casing- suggest leaving "and straight" in. For the installation of screens, liners, pumps, and pump columns, straightness is much more relevant than plumbness.
05. Liner- suggest deleting "steel." If steel is used, it falls under casing. Most liners installed are PVC.
08. Sealing of Wells- suggest plain language. Rewrite "all wells over 38 feet in depth shall be sealed to a minimum of 38 feet. All wells less than 38 feet shall be sealed to a minimum of 18 feet."
- a. Consolidated Formations (Rock)- rewrite "for wells drilled in consolidated formations, the casing shall be seated 5 feet into the formation."

b. Unconsolidated Formations (Sands, Clays, Gravels)- cased 5 feet into the water table is not sufficient for pump installation, should be a minimum of 20 feet. For wells drilled in unconsolidated formations, casing shall be sealed to a minimum of 38 feet.

i. "Rathdrum prairie"- Does this need to be in here? Also, 5 feet into the water table is not sufficient, as this water table can fluctuate 10 feet per year. Suggest 20 feet minimum. Our current best practice is 40 feet. Suggest replace with "Groundwater Management Areas- may have different sealing requirements. Check the specific area in which you want to drill for more information on sealing requirements." Suggest "Groundwater Management Areas" to be added in Definitions Rule (10).

c. suggest deletion of "if the well is less than 38 feet..."

09. Sealing of Artesian Wells- suggest deletion of all language of "if the well is less than 38 feet..."

c. What does "eliminated to the extent possible" mean? Suggest delete and state that any escaping water from the well must be sealed as required. If well cannot be sealed or controlled, the well shall be decommissioned and fully cemented to the containing layer.

17.

b. Need to exempt from well tagging:

Cathodic Protection Wells- sealed and completed below grade.

Closed-Loop Heat Exchange Wells- sealed and completed below grade.

18. Pitless Adapters- suggest delete. Not a part of well construction and not usually installed by a licensed driller.

19. Pump Installation- suggest delete. Not a part of well construction.

030. Construction of Low Temperature Geothermal Resource Wells and Bonding- May need to have definitions that apply entered under this heading.

035. Health Standards

01. Suggest "Public Water Supply Wells" not "System," as the system is installed by others, not the licensed driller.