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## **LDEQ Initiative Provides New E&P Waste Disposal Option**

Oil and gas drilling activity produces many benefits for the state. However, it also produces waste materials that must be properly handled. Recently, LDEQ provided generators with what could become a cost-effective and environmentally protective disposal option.

Traditionally, the Louisiana Department of Natural Resources (LDNR) provided two options for the disposal of Nonhazardous Oilfield Waste (NOW), or Exploration and Production Waste (E&P Waste). Waste Type 2 (oil-based drilling wastes) and Waste Type 3 (water-based drilling wastes) are created during the drilling process. LDNR allows on-site disposal of these wastes, under certain strict conditions. However, if the criteria are not met, the E&P Wastes must be moved off-site to an LDNR-permitted commercial facility. Waste Type 16 (crude oil spill clean-up waste) can be generated both on-site and off-site due to leaks or spills from storage tanks, pipelines, transport vessels, or transfer procedures. Waste Type 15 is E&P Waste from a LDNR-permitted commercial facility.

LDNR added a third option several years ago, which allowed the generator to send its E&P Waste to “Department of Environmental Quality (DEQ) permitted facilities as defined by LAC 33:V and VII which are permitted to receive E&P Waste.” LAC 43:XIX.503.E. LAC 33:V and VII are the hazardous waste and solid waste regulations. In other words, an E&P Waste generator had the option to send its waste to a LDEQ permitted solid waste or hazardous waste facility, if LDEQ allowed or permitted it to receive such waste.

LDEQ, however, has been slow to modify its permits to allow solid or hazardous waste facilities to receive E&P Waste. A notable exception is a hazardous waste facility in south Louisiana, whose permit allows the receipt of E&P Waste. To its credit, LDEQ is now in the process of exploring this possibility for solid waste landfills.

LDEQ instituted a pilot-study program of eighteen months duration, which should be complete around the end of this year. LDEQ issued Administrative Orders to five solid waste landfills allowing them to receive Waste Types 2, 3, and 16. Waste Type 15 may be received, but only from a facility that is permitted to receive only Waste Type 2, 3 and 16. The landfills are CWI - White Oaks, Webster Parish, Woolworth Road, LaSalle-Grant, and River Birch (located in the north, northeast, central, and southeastern sections of the state, respectively). These solid waste landfills are already permitted to receive industrial waste, which means that the environmental protections required to operate (liners, groundwater monitoring, leachate collections systems) are similar to hazardous waste landfills. The orders require that the landfills follow the LDNR manifesting requirements and report the types and amounts of E&P Wastes received to the LDEQ on a quarterly basis. LDEQ also mandated that each landfill monitor its wastewater discharges for chlorides so that information may be obtained on possible effects on the quality of the wastewater discharges.

LDEQ is currently receiving reports as required by the orders and assessing whether allowing E&P Waste to proceed to a solid waste landfill is protective of the environment. If so, LDEQ has indicated its willingness to modify the landfills’ permits to specifically allow the receipt of E&P Wastes. Hopefully, at the end of the pilot study period, LDEQ’s initiative will provide a permanent, viable and environmentally safe disposal option for these types of waste materials.

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