

Railroad Commission of Texas (RRC)

Hydrostatic Test Wastewater Discharge to Land Surface Frequently Asked Questions and Permit Processing Time Savers

The following questions, answers and tips have been compiled to help ensure the efficient processing of your application:

- **Who needs a hydrostatic test (HT) discharge permit from the RRC?**
Anyone who plans to discharge HT wastewater to land surface. HT wastewater includes any wastewater resulting from the hydrostatic testing of natural gas, crude oil, or other pipelines or tanks or other vessels under jurisdiction of the Commission.
- **Do I need a HT discharge permit if I will dispose of the HT wastewater if the wastewater will be collected in an above ground vessel prior to disposal in an authorized manner other than discharge?** No.
- **Can I discharge HT wastewater to a dry creek, pond, canal or ditch under an RRC permit?** No. Dry creeks, ponds, canals, and ditches are considered surface waters of the state. If HT wastewater will reach surface water, you must apply for a discharge permit from the Texas Commission for Environmental Quality (TCEQ).
 - Please visit the TCEQ website for information about permits to discharge HT wastewater to surface waters:
<https://www.tceq.texas.gov/assistance/industry/oil-and-gas/oil-and-gas-wastewater-permits>
- **Do I also need a HT discharge permit from the RRC if I will be discharging to surface water under the authority of a permit from the Texas Commission for Environmental Quality (TCEQ)?** No.
- **Are there any cases when a HT discharge permit is not required?** Yes, if the wastewater will result from the hydrostatic testing of a pipeline and all of the following conditions are met:
 - The pipeline is a gathering line.
 - The pipe is new.
 - The source of the test water is a good quality water sources, such as a potable water source or irrigation well.
 - The volume of test water discharges is 10,000 gallons or less.
 - The discharged test water is kept on the pipeline right-of-way and the landowner(s) has been notified of the discharge and has not objected.

- **How do I get a permit?** Complete the Requirements for a Permit Application to Discharge Hydrostatic Test Water to Land Surface and file with Technical Permitting in the Commission's Austin Office.
 - <http://www.rrc.texas.gov/oil-gas/applications-and-permits/environmental-permit-types-information/hydrostatic-test-discharges-minor-and-other-permits/hydrostatictestwater1change/>
- **How much does a permit application cost?** There is no fee.
- **Can I include more than one discharge point in one application?** No. A separate application must be filed for each discharge point.
- **Can I get more than one permit to discharge at the same location?** Possibly, each application will be considered on a case-by-case basis. Any application to discharge at a location where a permit(s) was previously issued must contain information concerning the previous permit(s), including the permit number.
- **Are there any other forms I need to file with the Commission?** Yes. Complete and file Form P-5 (Organization Report) along with the appropriate financial security. You can download the form from the Commission's website at <http://www.rrc.texas.gov/oil-gas/forms/>, or by contacting the P-5 department at 512-463-6772. Only the P-5 department can answer questions concerning the Form P-5.
- **Can I email or fax an application?** No. All applications must contain an original signature.
- **How long does it take to get a permit?** The Commission has 15 days from the date the application is received to give written notice to you indicating that either the application is complete and accepted for filing, or the application is incomplete. If the application is complete, the Commission has another 15 days to complete the final review. Applications will be reviewed in the order they are received. Filing a complete application will help to shorten the application processing time.
- **How can I help the permitting process?**
 - File the application early in your planning stage.
 - Make sure the application is complete.
 - Make sure the application certification has an original signature.
 - Be aware that operator must have an active Form P-5 on file with the Commission.

- Be aware that if proposal includes discharging wastewater to any private property, including the pipeline right-of-way, you must include a statement that the landowner(s) has been notified of the proposed discharge and has not objected.
- Submit the following signed statement: "No test water will reach surface waters of the state."
- **Will my permit require any analyses of the wastewater resulting from the hydrostatic testing?** Yes, if the wastewater will result from the hydrostatic testing of the following:
 - A used pipeline.
 - A used vessel.
 - A new pipeline and the volume of wastewater is greater than 100,000 gallons.
 - Also, analyses are required for all discharges that use a temporary wastewater storage system, such as frac tanks, regardless of the volume of the discharge.
- **How do I amend my permit to extend the permit expiration date?** Submit a request in writing. Include the permit number, proposed expiration date, and reason for requesting a different permit expiration date.