Horizontal Directional Drilling Technical Standards

DEADLINE: March 28 - The Wisconsin Department of Natural Resources is taking public comment on draft Technical Standards on Horizontal Directional Drilling (HDD). These standards are meant to identify planning and implementation practices to protect water quality by reducing the risk of inadvertent release of drilling fluids (aka frac outs) and limiting the impact to water should a release occur. These draft Technical Standards were written largely by industry representatives and DNR staff. **Tell the DNR that we need more time to review the standards and that we need standards that protect both surface water AND groundwater, not the industry's bottom line!**

Read the draft standards here.

Submit comments via email to soc@wisconsinlandwater.org by midnight on Monday, Mar. 28, 2022.

Talking points:

- Please extend the comment period for these standards 30 days from the original deadline so there's enough time to review them.
- The standards should require strict accounting, reporting and record making of all materials used with each HDD project. This should include:
    - Composition of drilling fluids used
        - Require Material Safety Data Sheets for any drilling additives
        - Volume of drilling fluids and chemicals used
        - Volume of drilling fluids and chemicals not recovered, including BOTH underground and surface releases
    - How and where spent drilling fluid, including mud and additives, will be disposed
    - How disposal will be monitored and reported
    - Any potential drilling fluid volume gain from an aquifer breach
- Require a monitoring plan for private wells that may be impacted by HDD activities.
- All HDD applications should require geotechnical analysis of all HDD sites before permits are given.
    - Geotechnical bores should be offset and not directly in the bore path to avoid causing fracouts.
- These standards should be rigorous and protect water, the local environment, and plant and animal health above industry interests and profit.