

MINUTES OF THE House COMMITTEE ON Energy and Natural Resources

The meeting was called to order by Representative David J. Heinemann at  
Chairperson

3:30 ~~xx~~ a.m./p.m. on March 16, 1983 in room 519-S of the Capitol.

All members were present except:

Representatives Ben Foster and Keith Roe (excused)

Committee staff present:

Ramon Powers, Research Department  
Theresa Kiernan, Revisor of Statutes' Office  
La Nelle Frey, Secretary to the Committee

Conferees appearing before the committee:

SB 147 - Bill Hanzlick, Director, Fish and Game Commission.  
Ted Cunningham, Kansas Outdoors Unlimited.

SB 149 - Bill Hanzlick.  
Ted Cunningham.  
Mike Bean, Kansas Livestock Association.

SB 150 - Bill Hanzlick.  
Ted Cunningham.

SB 280 - Vern Hart, Park and Resources Authority.

SB 268 & SB 272 - Jim Aiken, Director, Division of Environment, Kansas  
Department of Health and Environment.

SB 147 - Forfeiture of hunting license for violation of big game laws.

Bill Hanzlick, director of the Fish and Game Commission, testified in support of SB 147. He said the bill proposes to amend current big game and turkey penalty statutes, basically by requiring forfeiture of license for one year from the date of conviction for a first offense; then for the second offense the court may revoke the person's license for up to two years.

Ted Cunningham, Kansas Outdoors Unlimited, testified in support of SB 147, saying they wholeheartedly agreed with the proposed change in penalties.

SB 149 - Pursuit of wounded game birds or animals, restriction.

Mr. Hanzlick provided testimony regarding SB 149. He noted that there had been several discussions about this bill, both legal and otherwise, and they respectfully recommended that SB 149 be held back this year. He felt there was a problem dealing with personal property that must be addressed.

Mr. Cunningham concurred with Mr. Hanzlick on his comments about SB 149, and suggested that perhaps it be referred to the Subcommittee on Natural Resources for study.

Mike Bean, Kansas Livestock Association, testified regarding SB 149 saying they concurred with the decision to hold the bill until further study.

SB 150 - Appearance bonds for fish and game violations.

Mr. Hanzlick testified in support of SB 150. He noted that it updated the appearance bond, which has needed updating for quite some time. Currently, he said, nonresidents who come to Kansas to hunt or fish and do it illegally, get a ticket, and the bond is set at \$25 or so. He noted that penalty costs were less for the nonresident than for the Kansas resident who was ticketed for the same violation and did not post a bond or have court fees. This revision treats Kansas residents equally with nonresidents regarding violations.

Mr. Cunningham testified in support of SB 150. He said Kansas Outdoors Unlimited had been involved in suggesting a provision of the bill which recommends that Kansas residents be allowed to pay for a cash bond with a personal check.

A question and answer period followed the presentations of testimony on SB 147, SB 149, and SB 150.

CONTINUATION SHEET

MINUTES OF THE House COMMITTEE ON Energy and Natural Resources,  
room 519-S, Statehouse, at 3:30 ~~am~~ <sup>xx</sup> p.m. on March 16, 1983

SB 280 - Concessionaire's fee for issuance of camping permits.

Vern Hart, Park and Resources Authority, testified in support of SB 280. He said this bill would make camping permits available to the public when they arrive at state parks, by going to the concessionaire, if open 24 hours per day, and picking up the camping permit. He noted there is an additional 25¢ charge for the permit, which the concessionaire retains for handling the permit.

SB 268 - Civil penalty for deterioration of water quality.

SB 272 - State water planning and plan acts amendments.

Jim Aiken, director of the Division of Environment, testified in support of SB 268 and SB 272. He said that these two bills are part of a series of five bills introduced by the Kansas Water Authority for implementation of the State Groundwater Quality Management Plan proposed by the Division of the Environment. He noted that in SB 268 they are amending the statute which imposes a civil penalty for damage to water quality. He said money from the violations goes to the general fund. SB 272 provides for long-range goals and objectives relating to prevention of groundwater pollution (see attachment 1). Mr. Aiken also distributed to Committee members An Overview of the Plan for Protection of Kansas Groundwater Resources from Pollution (see attachment 2).

A brief question and answer period followed the presentation of testimony on SB 268 and SB 272, with a request being made that Mr. Aiken provide a list of types of water pollution to be covered by SB 268.

Chairman Heinemann asked for discussion and action on any bills heard by the Committee. He said that SB 268 and SB 272 would be referred to the Subcommittee on Natural Resources; a Committee concensus supported this decision.

FINAL ACTION ON SB 147

Representative Ron Fox made a motion that the Committee recommend SB 147 be passed. Representative Clint Acheson seconded the motion. The motion passed.

FINAL ACTION ON SB 150

Representative Fred Rosenau made a motion that the Committee recommend SB 150 be passed. Representative Fox seconded the motion.

Discussion ensued regarding allowing personal-check payment for a cash bond. Several Committee members expressed concerns about personal-check payment for a cash bond, and about having to make a personal appearance when a violation occurred.

After discussion, Representative Rosenau and Representative Fox withdrew their motion and second, respectively, on SB 150. The bill will be held in committee for further study.

FINAL ACTION ON SB 280

Representative Acheson made a motion that the Committee recommend SB 280 be passed. Representative Edgar Moore seconded the motion. The motion passed.

There being no further business to come before the Committee, the meeting adjourned at 4:45 p.m.

The next meeting of the Committee will be held March 21, 1983.



Date March 16, 1983

GUESTS

HOUSE ENERGY AND NATURAL RESOURCES COMMITTEE

NAME

ADDRESS

ORGANIZATION

NAME	ADDRESS	ORGANIZATION
Marge Streckfus	Sacina	League of Women Voters Audubon
Vern Hart	Topeka	Kansas Park Authority
Jim Power	Topeka	KDHE
Jim Aiken	Topeka	KDHE
Mike Bearn	Topeka	KLA
Bill Hanzlick	Pratt	Kansas Fish & Game
Kent Jackson	"	" " "

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT

James F. Aiken, Director  
Division of Environment

March 16, 1983

SENATE BILLS 268 and 272

The Division of Environment has statutory authority for control of most environmental contaminants and conditions relating to human health and welfare, aquatic flora and fauna, plant and animal life, and the soil. The division has grown steadily throughout the years with additional legislative changes to the point that balanced, yet interrelated, comprehensive environmental control programs have been achieved. The environmental goals within specific statutory responsibilities are to maintain a healthful environment free from disease-causing agents; reduce and prevent irritants affecting the enjoyment of life and property; preserve our natural resources; and develop environmental control programs which are responsive to the needs of Kansas in a cost-effective manner. The cornerstone to groundwater protection is the successful implementation of the Kansas Groundwater Quality Management Plan.

The Kansas Groundwater Quality Management Plan was prepared to manage activities to prevent pollution, to protect groundwater aquifers, and to coordinate administrative activities of government to insure adequate quantities of good quality waters will be available for future generations. The plan was outlined before the committee last year. During the session, the committee spent considerable time and effort dealing with ways to control and regulate the oil and gas field pollution problems. This element of the plan is in place. As a consequence, other important elements of the plan were deferred until this year.

On July 7, 1982, representatives of the Governor's office, Department of Administration, Board of Agriculture, Corporation Commission, Fish and Game Commission, Geological Survey, Health and Environment, Water Office, and Groundwater Management District Association met in Topeka to review the legislative package and plan and make recommendation to the Kansas Water Authority. The recommendations are based upon reaching consensus on the concept of the proposal and not necessarily the language. It should be noted there was not unanimity on all issues.

The group agreed to the concept of (a) notice being filed with the Kansas Department of Health and Environment after construction of basic data or research well, (b) increase limit of pollutant discharge fund, (c) to cover any pollution to the environment, no matter what the source, and (d) allow KDHE to request proceeding to create an intensive groundwater use area when the quality of groundwater has been found to be deteriorating. The group recommended special groundwater quality management areas be accomplished by a memorandum of understanding between the affected agencies. Finally, consideration of requiring permits for artificial recharge projects be delayed two years pending research studies sponsored by the state and assessment of requirements under the federal underground injection control program.

*Attachment 1*  
*3-16-83*

The Kansas Water Authority recommendations reflect the recommendations of the state agencies. As a consequence, Senate Bills 268, 269, 270, 271, and 272 were introduced. Senate Bill 269, 270, and 271 are still in the Senate Energy & Natural Resources Committee.

Senate Bill 268 would amend K.S.A. 65-170d, the statute which imposes a civil penalty for damage to water quality. The amendment would authorize the Director of the Division of the Environment to impose a civil penalty on any person who violates the provision of any other law pertaining to the unreasonable deterioration of water quality which does not impose civil penalties for the violation of such law.

Senate Bill 272 provides for long-range goals and objectives relating to prevention of groundwater pollution.

AN OVERVIEW OF THE  
PLAN FOR PROTECTION OF KANSAS  
GROUNDWATER RESOURCES FROM POLLUTION

James Aiken  
Kansas Department of Health and Environment

The State Water Quality Management Studies were developed under Section 208 of the Federal Clean Water Act and are commonly referred to as the 208 studies. The plan was submitted to the 1979 Session of the Kansas Legislature. After extensive committee deliberation, the Water Quality Management Plan was adopted. Later that year, both Governor Carlin and the EPA Regional Administrator put their approval on the plan. The Kansas Legislature in adopting the plan, directed KDHE to continue its work on development of a statewide groundwater quality management plan and report to the Legislature.

The plan reflects environmental issues and concerns identified by citizens and officials during an extensive public involvement process during the spring and early summer months of 1981. An initial draft was reviewed with many of the same groups in the fall. The plan reflects the consensus of comments from these informal review meetings.

Groundwater contamination is not visible to the naked eye. There is no simple way to determine the extent of groundwater contamination. Wells in an affected area may be a useful indicator, but in most cases there are too few wells to permit detection and delineation of the extent of pollution. Once detected, finding the source of groundwater contamination, which is not always as readily apparent as it is for spills into surface waters, is a major problem. Some contaminants undergo changes in the subsurface environment that make them hard to identify. Correcting groundwater contamination is time-consuming, expensive, and, in many cases, even virtually impossible. All in all, prevention of groundwater pollution is far more cost-effective than after-the-fact abatement efforts. The only satisfactory long-range control strategy for the protection of the quality of the state's groundwater resources is pollution prevention through sound management control programs. As a consequence, the plan for groundwater quality is a management plan with emphasis on controls and coordination between the nine state and five individual local agencies with direct or secondary management responsibilities in the prevention of pollution to groundwater reserves or protection of the quality of groundwaters. To accomplish desired management, the state must carry the responsibility. In this effort, local governments must be supportive of state efforts, and the federal government should monitor state efforts and provide technical assistance.

#### Potential Sources of Pollution

Out of sight, groundwater has often been out of mind. Groundwater generally moves very slowly, on the scale of only tens to hundreds of feet per year. This can mean very little dilution takes place once a contaminant reaches the groundwater, and once contaminated, groundwater is difficult, if not impossible, to clean up. There can be a variety of potential groundwater sources so as a consequence the plan stresses regulation of major potential sources.

*Attachment 2*  
*3-16-83*

Table 1 illustrates the relative magnitude of potential pollution by the volume of pollutants generated in one year. The tonnage of salt brought to the surface along with 58 million barrels of oil annually exceeds 10.2 million metric tons per year (11.2 million tons). This exceeds of all other sources combined. Natural mineral intrusion amounts to 3.6 million metric tons per year (4 million tons). Kansas produces commercially 1.4 million metric tons of salt annually (1.5 million tons); most of which is evaporated salt from solution mining methods. Sanitary landfills across the state annually bury over 1.9 million metric tons (2 million tons) of refuse from society. Kansas farmers put 1.5 million metric tons (1.6 million tons) of fertilizer on the land. To the credit of Kansas citizens, industries, and local government, the vast majority of the pollutants are controlled and disposed of in a safe manner to protect the environment. In part this is the direct result of regulation dating back to the 1930's.

Table 1  
Volume of Potential Pollutants Generated or Result  
of Man's Activities

<u>Potential Source</u>	<u>Million of Metric tons Per Year</u>	<u>Type of Pollutant</u>
Petroleum Field Operations	10.2 (11.2 Million Tons)	Salt
Mineral Intrusion	3.6 (4.0 Million Tons)	Salt
Solid Waste	1.9 (2.1 Million Tons)	Refuse
Salt Solution Mining	1.4 (1.5 Million Tons)	Salt
Fertilizer (applied)	1.5 (1.6 Million Tons)	Minerals
Mine Drainage	0.3 (0.3 Million Tons)	Minerals
Hazardous Waste Generated	0.1 (0.1 Million Tons)	Solids and liquids
Wastewater Treatment Sludges	0.05 (0.6 Million Tons)	Sludge

An Overview of the Management Structure

Kansas has five state agencies and one type of local unit of government (five groundwater management districts) with a major responsibility in groundwater management plus six others with important but lesser roles (Table 2). The term "management" is construed broadly to include four major kinds of activities: (1) planning, (2) data collection and research, (3) regulation, and (4) emergency response to significant pollution problems. Recognizing that these functions overlap and that "policy" and "coordination" exist in all four areas, this still provides a reasonable framework within which to describe and understand the groundwater quality management activities. Although Kansas Department of Health and Environment (KDHE), Kansas Water Authority and Office (KWA), and Groundwater Management Districts (GWDs) have been categorized as major "planners", this might be somewhat arbitrary because any agency that engages in data collection, research, regulation or emergency response has to plan in some way for those activities. Planning, in this case, has been limited to some specific responsibility for developing groundwater protection and management plans. Groundwater quality data collection, analysis and interpretive studies are made by KDHE, Kansas Geological Survey (KGS) and GMDs. Research is conducted by KGS and the state universities.

Table 2  
An overview of groundwater quality management activities by  
federal, state and local government

Name of Agency		<u>Type of Groundwater Quality Management Activity</u>			
		Planning	Basic Data and Research	Regulation	Emergency Response
<u>Federal Government</u>					
Environmental Protection Agency	EPA	P	P	P	P
Geological Survey	USGS	-	P	-	-
<u>State Government</u>					
Health and Environment Corporation Commission	KDHE KCC	P -	P -	P P	P -
Water Authority and Office Board of Agriculture	KWA SBA	P -	S S	- P	- -
Geological Survey Adjutant General	KGS AG	- -	P -	- -	- S
Universities Mined-Land Conservation & Reclamation Board	U ML	- S	S -	- P	- -
Human Resources	HR	-	-	S	-
<u>Local Government</u>					
Cities	Ci	S	-	S	-
Counties	Co	S	-	S	-
Groundwater Management Districts	GMD	P	S	P	-

P - primary responsibility  
S - indirect or secondary responsibility  
- - No responsibility



The two principal regulatory agencies in the groundwater quality management are Kansas Corporation Commission (KCC) and KDHE. Division of Water Resources, State Board of Agriculture (SBA), the agency which administers the state's water rights program, cannot be omitted since its decisions can and do impact groundwater quality management. Policy decisions and recommendations by GMDs to SBA likewise affect groundwater quality management. Both GMDs and SBA have authority to initiate controls on groundwater withdrawals where groundwater quality is deteriorating.

Finally, emergency response denotes a management activity to respond to pollution problems when identified and, to the extent possible, correct, contain, eliminate, or control the pollutant source. KDHE has been active in this area for many years working with the oil and gas industry, communities and citizens. The Office of Emergency Preparedness, Adjutant General, is responsible for overall coordination of disasters, but has minimal or no technical capability to respond to groundwater pollution problems.

The principal federal agency involved in environmental management is the U.S. Environmental Protection Agency (EPA). EPA has certain federal government responsibilities which, when considered broadly, can extend to all areas of groundwater quality management activities. It should be noted EPA administers the principal federal environmental program in the nation and its mission has a profound impact on many state programs. The United States Geological Survey (USGS) is the federal government's agency responsible for data collection. USGS also undertakes special studies and research.

Cities and counties through exercise of zoning powers can significantly impact groundwater quality. However, local zoning decisions seldom are made with protection of groundwater quality in mind.

The state's commitment to development, management and conservation is apparent in the creation of numerous state agencies with different assigned goals and objectives to deal with different facets of water resources management. Yet, despite the significance of the state commitment to address and eventually resolve water resource problems, critical water supply and quality problems still are facing the state.

Since the plan stresses prevention, a discussion of the administration and enforcement of state laws seems appropriate. Kansas statutes and regulations reflect the difficult and complex nature of groundwater pollution control. In order to give some order to a description of existing control so that the reader may more readily comprehend the subject, the material is presented under the following headings:

1. Water quality problems that originate on the land surface or in the ground above the groundwater.
2. Water quality problems that originate in the groundwater or below it.

In Table 3, the agency administering the regulatory program for each potential source of pollution is identified. KDHE is the principal administrative agency regulating potential pollution sources above the groundwater. The regulation of wells penetrating the groundwater aquifers or deep rock formation is handled by three different agencies. Oil and gas regulation is administered by KCC,

Table 3

Identification of Agencies Administering Potential Source of Pollution Programs

Potential Source of Pollution	Federal Government	State Government						Local Government		
	EPA	KDHE	KWA	KCC	SBA	ML	HR	Ci	Co	GMD
Groundwater Pollution that originates on the land surface or in the ground above the groundwater										
a. Brine and waste disposal materials	D	D	-	-	-	-	-	I	I	-
b. Accidental spill of hazardous materials	D	D	-	-	-	-	-	-	-	-
c. Solid and hazardous waste land fills	D	D	-	-	-	-	-	I <sup>1</sup>	I <sup>1</sup>	-
d. Buried petroleum storage tanks	I	D	-	-	-	-	-	D	D	-
e. Mineral mining, coal & metallic	I	I	-	-	-	D	D	I	I	-
Groundwater pollution that originates in the groundwater or underlying formation										
a. Oil and gas wells	D	D	-	D	-	-	-	-	-	-
b. Water wells	-	D	-	-	I	-	-	-	-	D
c. Injection wells	D	D	-	D	-	-	-	-	-	-
d. Disposal wells, industrial	D	D	-	-	-	-	-	-	-	-
e. Disposal wells, oil field	D	D	-	D	-	-	-	-	-	-
f. Abandoned wells and seismic holes	-	-	-	D	-	-	-	-	-	-
g. Natural mineralization	-	D	D	-	-	-	-	-	-	-
h. Groundwater mining	-	-	I	-	D	-	-	-	-	D

D - Direct  
I - Indirect  
- - None

<sup>1</sup> - Indirect, solid waste siting only

water withdrawals by SBA, and all other wells by KDHE. The EPA Federal Under-ground Injection Control program under the Safe Drinking Water Act, designed to protect underground drinking water supplies, will have an impact on future administration of laws dealing with wells.

Another way to identify issues is to examine the overall authority under various statutes in protecting groundwater from potential sources of pollution. A simple check list of powers and duties was used. These include permitting, operation standards, monitoring, enforcement, and closure. As Table 4 indicates, KDHE is the principal agency responsible for the permitting through the closure of a facility above the groundwater, with the exception of mineral mining. Coal mines are regulated by the Mined Land Conservation and Reclamation Board. Kansas laws are silent on regulatory responsibility for shaft type mines except for mine safety and filing a plan. These are handled by the Department of Human Resources.

Early in plan formulation we opted not to recommend reorganization, but, to design a plan to strengthen the management through cooperation between the agencies involved in protecting our groundwater resources.

### Kansas Groundwater Quality Management Plan

The Kansas Groundwater Quality Management Plan places emphasis on management activities to prevent pollution, to protect groundwater aquifers, and to coordinate administrative function of state and local units of government to insure that adequate quantities of good quality groundwaters will be available for future generations.

#### Current Status

During the 1982 Session of the Legislature, the Senate Energy and Natural Resources Committee spent considerable time and effort dealing with ways to control and regulate the oil and gas field pollution problems. Senate Bill 498 provides for joint jurisdiction of the State Corporation Commission and the Department of Health and Environment over oil and gas related pollution. The Commission and the Secretary are required to enter into a comprehensive inter-agency agreement providing for a management plan to integrate field operations for the regulation of pollution resulting from oil and gas activities. The bill prohibits any well drilling without a permit and sets the standards for approval of applications for such permits. The bill also establishes the responsibilities of the operators in charge of the physical operation of each well, requires that such persons be licensed and pay an annual fee, creates a ten-member advisory committee on the regulation of oil and gas activities, and provides for new administrative penalty violations in an amount not to exceed \$10,000. This element of the plan has been addressed and resolved.

The length of time involved in legislative deliberation precluded consideration of other elements of the plan. The report on the plan outlines the new or amendatory legislation (pages 47 through 54), including the "Environmental Groundwater Quality Management Plan" (pages 55 through 58).

Table 4

## Identification of Statutory Authority

<u>Potential Source of Pollution</u>	<u>Permitting</u>	<u>Operation Standards</u>	<u>Monitoring</u>	<u>Enforcement</u>	<u>Closure/Abandonment</u>
Groundwater Pollution that originates on the land surface or in the ground above the groundwater					
a. Brine and waste disposal materials	S/KDHE	S,R/KDHE	S/KDHE	S/KDHE	R/KDHE
b. Accidental spill of hazardous materials	-	-	S/KDHE	S/KDHE	-
c. Solid waste landfills	S/KDHE,Co	S/KDHE,Co	S/KDHE	S/KDHE,Co	S/KDHE
d. Hazardous waste disposal site	S/KDHE	S/KDHE	S/KDHE	S/KDHE	S/KDHE
e. Buried petroleum storage tanks	S/KDHE	S,R/KDHE	S/KDHE	S/KDHE	R/KDHE
f. Mineral mining, coal & metallic	S/ML	S/ML	S/KDHE	S/ML	S/ML
Groundwater pollution that originates in the groundwater or underlying formation					
a. Oil and gas wells	S/KCC	S/KCC, S/KDHE	S/KDHE,S/KCC	S/KDHE, S/KCC	S/KCC
b. Water wells	S/SBA	S/SBA	-	S/SBA	S/KDHE
c. Injection wells	S/KCC	S/KCC, KDHE	S/KDHE	S/KCC, KDHE	S/KCC
d. Disposal wells, industrial	S/KDHE	S/KDHE	S/KDHE	S/KDHE	R/KDHE
e. Disposal wells, oil field	S/KCC, S/KDHE	S/KCC, KDHE	S/KDHE	S/KDHE	S/KCC
f. Abandoned wells and seismic holes	S,R/KDHE	S/KCC	-	S/KCC	S,R/KCC
g. Groundwater mining	S/SBA	-	-	S/SBA	-

## Authority citation

S - Statute, generally covered

R - Regulation, generally covered

- - Not required by statute or regulation

## State Agencies Recommendation

On July 7, 1982, representatives of the Governor's office, Department of Administration, Board of Agriculture, Corporation Commission, Fish and Game Commission, Geological Survey, Health and Environment, Water Office, and Groundwater Management District Association met in Topeka to review the legislative package and plan and make recommendation to the Authority. The recommendations are based upon reaching consensus on the concept of the proposal and not necessarily the language. It should be noted there was not unanimity on all issues.

The last column of Attachment A notes the group's recommendation. In summary, the group agreed to the concept of (a) a notice being filed with the Kansas Department of Health and Environment after construction of basic data or research well (Item 2), (b) increasing the limit of pollutant discharge fund (Item 6), (c) covering any pollution to the environment, no matter what the source (Item 7), and (d) allowing KDHE to request proceeding to create an intensive groundwater use area when the quality of groundwater has been found to be deteriorating (Item 11). The group recommended special groundwater quality management areas be done by a memorandum of understanding between the affected agencies. Finally, consideration of requiring permits for artificial recharge projects be delayed two years pending research studies sponsored by the state and assessment of requirements under the federal underground injection control program.

The agencies recognize the need for development of a properly managed planning process in which one agency directs the process and other agencies participate in a predetermined format with an agreed to time schedule. The group recommends in the future that the KWO take the leadership for direction of an integrated planning effort which would spell out responsibility of agencies. Ultimately, any planning documents would be submitted to KWA for action and incorporation into the state water plan.



LEGISLATIVE PACKAGE TO IMPLEMENT GROUNDWATER QUALITY MANAGEMENT PLAN

ATTACHMENT A

1/8/82

7/12/82 Revised

No.	Page	Element	Number	Item	Implementation	State Agencies Recommendations
1.	47	Planning	1, 5	<del>KDHE to prepare, submit and revise plan</del>	SEP #2, 3, and 4	Incorporate in State Water Plan
2.	49	Basic data research	5	Verification that basic data and research wells were constructed and abandoned in accordance with state regulations.	New KSA 82a-1216	Concept acceptable
3.	50, 51	Regulation	3a,b,c,d	Revision to Chapter 55 pertaining to oil and gas	Amendatory Chapter 55, Articles 1, 9, & 10	Concept in SB 498
4.	51	Regulation	3e(1)	Injunctive action	Amend Chapter 55, Article 1, 9, 10	Concept in SB 498
5.	51	Regulation	3e(2)	Penalties for violations	Amendatory - Chapter 55, Article 1, 9, & 10	Concept in SB 498
6.	51	Regulation	3e(3)	Increase limit of pollutant discharge fund	Amend KSA 65-171W	Concept acceptable
7.	51	Regulation	3e(4)	To cover any pollution to the environment, no matter what the source	Amend Chapter 65, Article 1	Concept acceptable
8.	51	Regulation	4a	Special groundwater quality management areas	SEP #11	Recommended Memorandum of Understanding in lieu of legislation
9.	51	Regulation	4b,c	Coordination procedures in such areas	SEP #10, Amend KSA-82a-711	Recommended Memorandum of Understanding in lieu of legislation
10.	51	Regulation	4d,e	Water well construction and abandonment	Amend KSA-82a-711	Concept acceptable handle through MOU
11.	52	Regulation	4f	Intensive groundwater use areas	Amend KSA 82a-1036	Concept acceptable
12.	52	Regulation	5a	Regulations on industrial disposal wells	--	KDHE to adopt regulations
13.	52	Regulation	5b	Artificial recharge projects	New KSA 82a-1217 Amend KSA 82a-707	New legislation be delayed two years
14.	52	Regulation	5g	Revise regulation on conductor or tubing for salt solution mining well	--	KDHE revise regulations

Notations SWP State Water Plan  
 SB Senate Bill  
 MOU Memorandum of Understanding  
 KWO Kansas Water Office  
 KDHE Health and Environment