

Certification of Well Service Professionals Regulation Update, 310 CMR 46.00
Notice to Reviewers – October 2026

Throughout the development of these draft regulations, MassDEP worked with a Technical Advisory Committee (TAC) to provide advice on the development of MassDEP's current Well Driller Program. The TAC included representatives from the well drilling industry, geothermal industry, Office of the State Geologist, public water suppliers, water supply consultants, and municipal boards of health. In addition, the Board of State Examiners of Plumbers and Gas Fitters, the Massachusetts Ground Water Association, Union Representatives, and others provided helpful information. MassDEP considered all of this feedback while drafting revisions. When reviewing these proposed regulations for comment, we ask that you also consider the following specific points and provide feedback:

1. Should Massachusetts consider a tiered certification system for well service professionals for future implementation?

- To date, MassDEP has offered one level of certification for two certificate types (the general Well Driller Certificate and Monitoring Well Driller Certificate). The draft regulations propose to continue offering one level of certification for six certificate types (Water Well Driller, Monitoring Well Driller, Closed Loop Ground Source Heat Pump Well Driller, Well Yield Enhancement Technician, Level 1 Pump Installer (Level 1A/1B), and Level 2 Pump Installer).
- Some states (e.g., Maine, Connecticut, New Jersey, Maryland, Iowa, Louisiana, Missouri, Nebraska) offer tiered licensing or certification. That is, for a given license or certificate type, the state offers multiple levels of licensure. For example, for a Water Well Driller license, the state may offer apprentice, journeyman, and master level licenses. A well driller must meet educational and/or experience requirements within each tier in order to apply for a higher tier.
- *Note: the introduction of tiered certification would likely require establishment of educational criteria, job duty milestones, etc., and may need to be phased in over time.*

2. Should Massachusetts consider a reciprocity path with a shorter experience requirement for licensed non-water well drillers?

- Geotechnical drilling, defined here as drilling a Well¹ used solely for the temporary de-watering of a construction site, blasting, soil vapor extraction, air

¹ As defined in 310 CMR 46.02 of the Draft Well Services Regulations

sparging, grounding rod installation, or for any other purpose where the installation Casing¹ remains in the ground for less than 48 hours after placement, is exempt from regulation under 310 CMR 46.00. This exemption applies to both the current and proposed regulations.

- MassDEP welcomes input on whether/how non-water well drillers (e.g., drillers with a Class 4B Hoisting License that complete soil borings, install piles or other structural supports, etc.) should be able to apply their work experience toward the proposed 2-year requirement for certification in any of the four Certified Well Driller¹ classes.
- Applicants would still be required to provide documentation of their experience via well/boring logs or other materials deemed acceptable by MassDEP.
- *Note: the current average experience requirement for a well driller license in 19 surveyed states, including all New England states, is 2.4 years.*

3. Should Well Service Businesses be registered or required to sign a bond and have liability insurance?

- Today, a business offering well drilling services is not necessarily owned or operated by a Certified Well Driller. Though not currently in the proposed regulation revisions, business registration could serve to bolster the public's confidence in Well Service Businesses by ensuring that each such business employs an individual certified in the particular Well Services being offered. In addition, registration could help to ensure that not only the Well Service Professional, but also the businesses employing them, commit to performing work in a safe and appropriate manner and to timely filing of Well Completion Reports. Under such a business registration requirement, Well Service Businesses would be required to complete a one-page form annually.
- Alternatively, a surety bond and liability insurance could provide similar benefits to those of a business registration system. A surety bond would serve to ensure that Well Service Businesses and their staff comply with all laws, regulations and contracts relating to the Well Service work, while liability insurance would serve to ensure that the Well Service Business can financially compensate clients in the event of accidental damages or injuries while performing Well Services work. If such a requirement were included in the regulations, Certified Well Service Professionals would potentially be required to complete a bond and liability insurance form as part of their annual certification renewal.
- MassDEP welcomes input on whether Massachusetts should consider either/both of these potential requirements.