



# ROADS TO NOWHERE: WHEN RECYCLING NO LONGER MAKES SENSE

## THE CHALLENGE

It makes sense to minimize material consumption and maximize recycling wherever practical. However, policies on recycling should not be absolute. Whether recycling makes sense or not depends on numerous factors, including the purpose of the secondary material, the total ecological impact of the process, and the cost efficiency of the recycling program. Legitimate recycling requires that there is a genuine purpose to the recycled material. Conversely, the EPA defines “sham recycling” as situations when a secondary material is only marginally effective for its claimed use or is used in excess of the amount normally necessary.<sup>1</sup>

An example of sham recycling is the repurposing of drill cuttings as road base material for oil and gas leases. In theory, oily cuttings (which are an unavoidable byproduct of drilling) can be dried and hardened with cement to form a base material for construction of lease roads. Except in reality there are several major obstacles in this process. The volume of cuttings produced can easily outpace the demand for new lease roads. A significant footprint is therefore required to stockpile excess material. Piles of oily cuttings sitting on the ground increase the risk of soil and groundwater contamination and create an emissions hot spot as the hydrocarbons volatilize in the air. Moreover, the hardening process requires significant quantities of cement to meet road base specifications. This has both a carbon and a cost impact. In short, a bona fide recycling project can quickly become a road to nowhere.



*Cuttings Stockpile in West Texas*

## THE SOLUTION

Operators stuck in this situation consistently find that the most reliable and secure alternative is to dispose of drill cuttings at a regulated E&P landfill. Unlike reserve pits, landfarming, or sham recycling projects, Milestone’s E&P landfills have multiple redundant layers of liner protection and are engineered with leachate collection systems and permanent groundwater monitoring of the surrounding area. Furthermore, when waste is taken to a landfill, liability for the waste transfers from the operator to the disposal company. Simply put, for cuttings disposal, E&P landfills are the only reliable, efficient, secure, and cost-effective alternative to riskier onsite disposal methods.

## KEY LESSONS/CONCLUSIONS

- Legitimate recycling projects should have a genuine purpose for the end-product and a total net benefit to the environment.
- Repurposing drill cuttings as road base material is fraught with impracticalities and environmental risk.
- E&P landfills are stringently regulated and rigorously designed to ensure environmental protection. For cuttings disposal, they are the most reliable, efficient, secure, and cost-effective alternative to riskier onsite disposal methods.

<sup>1</sup> United States Environmental Protection Agency ([epa.gov/hw/legitimate-hazardous-waste-recycling-versus-sham-recycling](https://www.epa.gov/hw/legitimate-hazardous-waste-recycling-versus-sham-recycling))