

GAU Requirements for Class VI Carbon Sequestration

For Questions call: (512)463-2741 or email GAU@rrc.texas.gov

Introduction: GAU issues two (2) categories of GW-2 letters during the life cycle of Class VI (CCS) applications, called **Phase I** and **Phase II**. The GW-2 Letters needed in **Phase I** include stratigraphic test wells and monitor wells. Phase I GW-1 Reason for Filing is always Test Well. These GW-2 letters are needed prior to drilling or plugging operations. Test Well GW-2's contains water protection depths, and USDW depths for setting surface casing and plugging. Some test wells will become CCS injection wells and monitor wells in Phase II. If requested, GAU will also include minimum isolation statements in the individual Test Well letters. The average turnaround time for Test Well letters is 10 working days (2 weeks) for standard delivery, and 4 working days for expedited letters

In **Phase II** the GAU needs to conduct a protected groundwater isolation review for the entire Facility/Area of Review (AOR) and all injection wells in that AOR and then issue a GW-2 (Water Board Letter) stating that USDW waters will be protected in the opinion of the GAU for the entire AOR. The Phase II Reason for Filing is Class VI. Because this single letter covers the entire CCS project, and all requested injection wells in that AOR, this letter does not contain water depths or isolation statements it contains only the “Harm” or “No Harm” determination language. This Class VI letter is ordered after the Special Injection Permits (SIP) group completes their permit review, but before SIP issues an injection permit to the Facility. This is required so the final position and number of all injection wells is known before this letter is issued. The average turnaround time for Class VI No Harm Letters is 10 working days (2 weeks) for standard delivery as there is no expedite option for Phase II. Below is an outline of the steps in each of the two (2) Phases.

Phase I

Class VI (CCS) GAU Letters Required:

Activity: Site Characterization, Ordering and/or Drilling of Stratigraphic Test Wells and Monitoring Wells prior to the issuance of the Final Class VI No Harm Letter.

GAU Review & Letter(s) are required:

- Login to the GW-1 On-Line Application
- Select Reason for Filing “**Test Well**”
- Attach CSS Data Sheet
- Write in “**Purpose CCS**” in the Comments section of the GW-1 form
- Issued GW-2 will include BUQW and USDW Statements
- Minimum Isolation Statements may be included if requested
- “**No Harm**” language shall not be included when reason for filing is “**Test Well**”
- No Charge for ordering the GW-2 Test Well letters

Phase II

Class VI GAU No Harm Letter Required for the Facility:

Activity: Operator Testing, Application, and SIP review completed Permit to Inject Needed

GAU Review & Facility No Harm Letter is required:

- ❖ SIP sends notification to email box GAU@rrc.texas.gov for each individual CCS Project indicating CCS review is complete and the only deficiency is the GAU **No Harm** Letter.
- Operator Logs into the On-Line GW-1 Application to order a GW-2
- Select Reason for Filing “**Class VI (CCS)**”
- Select Areal Extent select “**Lease**”
- Choose a single centrally located CCS injection well for answering the GW-1 application questions

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- API, GPS Coordinates, Survey, Location, Depth, Elevation etc. for centrally located well
- Attach CSS Data Sheet
- Attach detailed Map of CCS Project Area (AOR) which includes all injection wells and Survey lines
- Subject line and Body of letters contain: County, Operator Name, Lease Name, CCS Control Number, and Live Link to current version of Operators CCS Application on internal drive

NOTE:

- SIP CCS Review must be completed and there must be SIP intent to issue an injection permit
 - Characterization of stratigraphy and confinement is complete
 - Number of injection wells and exact locations are finalized
 - No other technical deficiencies are identified
- A separate 1-to-2-hour GAU Workstation Review is typically required by GAU Geologists prior to issuance. GAU Workstation Reviews may be waved for special situations, like offshore projects where no USDW exists.
- A Separate abbreviated review of the CCS Application will also be conducted by the GAU
- Groundwater calls and Isolation statements are not provided or needed for this GW-2 Letter
- **No Harm** Language is Required before SIP can issue a final injection permit for the project AOR