LMOGA

Louisiana Mid-Continent
Oil&Gas Association

December 1, 2020

Transmitted via hand delivery

OFFICE OF CONSERVATION

DEC 01 2020

INJECTION & MINING DIVISION

Stephen Lee
Director
Injection and Mining Division
Office of Conservation
Louisiana Department of Natural Resources
PO Box 94275
Baton Rouge, LA 70804

Re: Comments on Proposed Regulations for Class VI Wells

Dear Stephen,

The Louisiana Mid-Continent Oil and Gas Association (LMOGA) appreciates the opportunity to comment on the Louisiana Department of Natural Resources' (the Department's) notice of intent to establish regulations governing Class VI wells, which are for permanent carbon sequestration.

LMOGA is a state trade association which represents all aspects of the oil and gas industry in the State of Louisiana. The companies which make up LMOGA's membership consider safety and environmental stewardship to be core values in all aspects of their operations, and carbon sequestration will play a key role in Louisiana's recently announced emissions reduction goals.

LMOGA commends the Department for the work it does to manage Louisiana's bountiful natural resources in a responsible and environmentally conscious manner.

Additionally, LMOGA fully supports the Department as it works with the Environmental Protection Agency (EPA) Region 6, to become the primary regulator for Class VI wells.

LMOGA recognizes that the Class VI regulations proposed in the October issue of the Louisiana Register represent a critical step in the Department's primacy efforts, and as such, LMOGA supports the Department's notice of intent.

To ensure a fully functional and useable Class VI program, LMOGA respectfully requests that the Department would consider the following recommended changes to the proposed regulations:

Miscellaneous Wording
To ensure clarity, LMOGA recommends changing the wording in paragraph 609.C.5.a from "submitted a plugging and abandonment report" to "submitted a Well Closure Report and complied with closure and post-closure requirements according to paragraph 633." LMOGA also recommends adding a definition of Well Closure Report to these rules.

Reporting Requirements
There appears to be a discrepancy between a reporting deadline in the EPA rules compared to the Department's proposed rules. Specifically, the 14-day reporting requirement specified in the

proposed paragraph 609.L.5 is shorter than the 30-day period outlined in the corresponding EPA rule at 40 CFR 144.51(l)(5).

A 14-day reporting requirement presents somewhat of a challenge, and LMOGA respectfully requests that the Department would consider making this requirement 30 days to reflect the requirement in the EPA rule.

In conclusion, LMOGA supports this rulemaking action by the Department, and LMOGA appreciates the opportunity to provide comments and participate in the rulemaking process.

If you have any questions, please do not hesitate to contact me.

Sincerely,

Nathan McBride
Regulatory Affairs Manager
Louisiana Mid-Continent Oil and Gas Association

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