Request for Additional Information

[GCS Hackberry (R06-LA-0007)] - [Request #A-1]

Instructions: Populate the "Response" column with answers/responses to each comment/question below, then upload the completed responses to Field #3 in the "Information Requests" reporting module of the GSDT. If necessary, upload attachments or references in Field #4 of the module and/or update information within other GSDT modules. *To allow reviewers to locate and review changes/updates quickly, clearly identify the location within the application where edits for each response were made (e.g., Site Characterization, Section 2.7.4, p. 53, updated paragraph 2).*

Item #	Associated Regulation(s)	Comment/Question	Response
AOR/Corrective Action			
1	40 CFR 146.82(a)(4), 40 CFR 146.84(c)(2), 40 CFR 146.82(a)(21), 40 CFR 146.84(d)	**Background:** On Page 3-6, it's written that "the results of the area of review evaluation yielded zero (0) artificial penetrations within the AOR boundaries." However, a detailed explanation of AP identification procedures and AP records searches is not provided, and there appears to be no indication that an exhaustive AP records search was conducted, including examinations of LDNR's microfiche library, other commercial maps, scout tickets, etc. Since LDNR has confirmed to EPA that well records exist outside of SONRIS, including a comprehensive library of microfilm/microfiche records kept at LDNR's offices, well records compiled solely from SONRIS are considered incomplete and do not satisfy 40 CFR 146.84(c)(2) and 40 CFR 146.84(d). EPA's Underground Injection Control (UIC) Program Class VI Well Area of Review Evaluation and Corrective Action Guidance document (EPA 816-R-13-005, May 2013), which supports 40 CFR 146.84, discusses two critical narratives that detail the technical efforts for: (1) identifying all APs in the area of review, and (2) the AP records data collection process associated with the AOR APs to assess their conditions concerning the impact of the proposed Class VI action. The procedures and protocols for this are discussed in Chapter 4 of the guidance document found at https://www.epa.gov/sites/default/files/201507/documents/epa816r13005.pdf.	

Item #	Associated Regulation(s)	Comment/Question	Response
		Comment: Please provide information for items (1) and (2) above detailing how the AOR AP locations were searched for. The updated information should include detailed steps taken to ensure the identification of all APs within the AOR, and it should include a detailed description of steps taken to conduct an exhaustive records search, including searches beyond LDNR's online SONRIS database.	
2	40 CFR 146.84(c)(1)	**Background:** GEM software was used to model "multiple plumes, stacked on top of each other and separated by shale beds, in order to control the lateral extent of the resultant plumes thereby keeping them within controlled pore space." The AOR was defined by the "shape and lateral extent of the largest of the stacked injection plumes" (page 3-3). However, there is no further discussion of the site characterization methods and other data inputs used to validate or further inform this AOR. **Comment:** Please provide a narrative justifying how the AOR delineation represents the largest area where injection activity may endanger USDWs. Reference the site characterization methods, data collection tools, and any heterogeneity or uncertainties that have been considered in the AOR. Show the controlled pore space and describe how it affected AOR delineation.	