UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 20, 2023 Sent by email only

Hackberry Carbon Sequestration, LLC
501 Louisiana Ave.,
Baton Rouge, LA 70802

RE: Underground Injection Control (UIC) Permit Application R06-LA-0007
Class VI Pre-Construction Permit Application
Technical Review of Application, Area of Review

Dear Mr. Gilbert:

Upon completing the initial phase of the technical review of the Area of Review for the UIC Class VI permit application submitted by Hackberry Carbon Sequestration, LLC for HCS Well No. 001, EPA Region 6 has determined that the application does not meet the requirements in 40 CFR §146 Subpart H.

The review team determined that insufficient information was given regarding procedures used to identify artificial penetrations in the AOR, as required by 40 CFR §146.84. The standard is an exhaustive records search that includes Lousiana Department of Natural Resource's SONRIS database and physical microfiche archives, commercial maps, scout tickets, and other potential repositories. The application should indicate the sources used to determine that there are no artificial penetrations in the AOR.

In addition, there is insufficient information about the determination of the AOR extent. The narrative states that pore space rights were a significant consideration but needs to show how they influenced the AOR delineation. The narrative in this section should also reference the site characterization methods, data collection tools, and any heterogeneities or uncertainties that have been considered in the AOR.

The attachment accompanying this letter details the deficiencies in the AOR section and provides space for response and clarification.

If you have any questions, please contact Brody Friesenhahn at (214) 665-7259.

Sincerely,

Johnson, Ken-E
Digitally signed by Johnson, Ken-E
Date: 2023.01.20 18:39:14 -06'00'

Ken Johnson, PE
Ground Water / UIC Section Chief