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

April 6, 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: Modeling, Well Constuction, Testing and Monitoring, Pre-Operational Testing, Plugging Plan, Post Injection Site Care/Site Closure

Dear Mr. Gilbert:

Upon completing the initial phase of the technical review of the Modeling, Well Construction, Testing and Monitoring, Plugging Plan and Post Injection Site Care/Site Closure sections of 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.

In addition to new questions regarding the model domain, the review team has identified insufficient responses to previous requests regarding the static and dynamic modeling of the sequestration site. EPA remains unable to access files pertaining to the modeling section of this application. #A4_Attachment_2 provides the names of the model files submitted to the GSDT. These files should also be submitted to the OneDrive so that they can be accessed by our review teams. Please refer to Item # 12 and the aforementioned attachment for more information.

In addition, the review team has found that the Well Construction section of this application does not provide sufficient detail to satisfy the requirements of 40 CFR 146. 86. The applicant should demonstrate that all construction materials are compatible with the injectate and formation fluids and should provide specific detail regarding the parameters of this well. Please refer to Items #13-16 for more information.

Our review team has found that insufficient detail has been provided regarding Pre-Operational Testing, Testing and Monitoring and PISC/SC sections of the application to meet the requirements of 40 CFR 146.87, 146.90 and 146.93. Additionally a draft Stimulation Plan should be provided to the application in order to avoid a potential Major Modification in the future. Our reviewers are aware that a stimulation program may or may not be necessary but a “draft” Stimulation Plan should be provided prior to the issuance of a Permit to Construct in order to avoid a potential Major Modification and additional public comment period (40 CFR 144.41).

Please review the attached documents for detailed comments on the Class VI application and provide responses to this request using the attached tables to ensure the most timely and effective application review. If you have any questions, please contact Brody Friesenhahn at (214) 665-7259.

Sincerely,

Johnson, Ken-E Digitally signed by Johnson, Ken-E
Date: 2023.04.06 13:55:51 -05'00'

Ken Johnson, PE
Ground Water / UIC Section Chief