

COMMENT #9

John - My concerns are of the "wordsmithing" category; although you may not want to deal with them at this early drafting stage, I think it might be helpful to clear up some confusion.

Through the draft, I found "geologic sequestration target formation", "sequestration reservoir", "storage reservoir", and "reservoir. My rule of statutory or regulatory interpretation is that if the law or rule uses different terms, then the intent is to differentiate among the terms. Unless you there's a difference, I would suggest using "geologic sequestration target formation" throughout.

In "Permit Application", c (vii) and d on page 3, what are "associated fluids?" Should the term be defined?

In (4) on page 4, I would recommend: "These emergency response procedures shall be updated..."

In "Geologic Seq. Well Standards" on page 5, the citation on line 2 should probably be to chapter 344-12 WAC. In "Permit Conditions" on page 7, 6 d, what is "acoustic monitoring"? Does it need an explanation or definition?

In "Closure", page 7, should "financial assurance instrument" reference the description in the "Financial Assurance" section below? Alternatively, move the latter section above "Closure."

Call if questions - 206-782-5909. Chris Towne