

## Stakeholder Discussion 11/13/2007

### Ch 173-218 WAC Underground Injection Control Program

#### WAC 173-218-030 Definitions

Concern re: definition of geologic containment system – how to specify the boundary of the system? Is it structural, or modeled? Need additional specificity to physically define boundary. Need to include a time component, as well as the other dimensions. Important to be specific here to clarify what the applicant will be required to demonstrate. Suggestion to provide guidance in the rule, plus allow for other methods as approved by Ecology. Also suggestion to provide accompanying guidance outside of the rule to define the methodology to calculate the boundary.

Vote of including Pete’s suggested language in the geologic containment system plus the Ecology caveat:

- still concern that if you define the boundary of the containment system, still have to assure sufficient monitoring
- a boundary should be concrete – you are either in or out; defining by a percentage doesn’t make regulatory sense

Monitoring zone definition – proposal to strike the last sentence of the definition.

- If so, concern with lack of specificity

Would be useful to define purity of CO<sub>2</sub> stream to be sequestered

#### WAC 173-218-115 (1) Specific requirements for Class V wells used to inject carbon dioxide for permanent geologic sequestration.

Suggestion to acknowledge that current application form for industrial waste discharge permit does not accommodate sequestration projects.

Question as to why the well needs to be deeper than any potable water well? What would be the burden of proof on the applicant to demonstrate there’s no potable water under their formation? Suggestion to strike that portion of the sentence.

<b>(2) Permit Application</b>
<p>Definition of leakage? Note impacts, vs. specific numbers on leakage  Suggestion to develop a set of minimum standards – qualifying criteria. E.g., no projects on the border of Canada, protection of monitoring areas, no active faults present, etc.  Include a description as to how permit writer would address environmental or jurisdictional concerns associated with the project</p>
<b>(3) Geologic Sequestration Well Standards</b>
<b>(4) Permit Terms and Conditions</b>
<p>Need to allow for fracturing of the reservoir; would then need diligence to evaluate risks from fracturing in specific project  Pilot study requirement – taking suggestions on further clarity to ensure regulatory intent is met</p>
<b>(5) Closure</b>
<b>(6) Post Closure Activities</b>
<b>(7) Financial Assurance</b>
<b>(8) Mitigation and Remediation</b>

