

## GAU Requirements for Class VI Carbon Sequestration

For Questions call: (512)463-2741 or email [GAU@rrc.texas.gov](mailto:GAU@rrc.texas.gov)

**Introduction:** The GW-1 Program was written with limited workflow controls prior to the creation of the Class VI (CCS) Program. As a result, it is necessary for GAU to issue two (2) categories of GW-1 letters during the life cycle of Class VI (CCS) Applications. The first set of GW-2 Letters is needed at the beginning of the CCS project with relatively quick turnaround, Reason for Filing “Test Well” which are **GW-2 groundwater** letters that enable operators to conduct drilling operations for new drill/reentry, test wells, monitoring wells, and future Class VI (CCS) injection wells (referred to herein as **Phase I**). The entire Class VI (CCS) review process takes months or years and an additional final GW-2 **No Harm** letter for the entire facility is needed, at the later final Phase of the CCS project review, after the Special Injection Permit (SIP) group completes the permit review, but before SIP issues an injection permit to the Facility (referred to herein as **Phase II**). In the second phase the operator orders a GAU Reason for Filing “Class VI (CCS)” No Harm Letter for the entire Facility stating that USDW waters will be protected at the Facility in the opinion of the GAU. Below is an outline of the steps in each of the two (2) Phases.

### **Phase I**

#### **GAU Test Well GW-2 Letters required at beginning of CCS project:**

**Activity:** Drilling of Test Wells, Monitoring Wells, Future Class VI Injection Wells

GAU Review & Test well Letter(s) are required:

- Login to the GW-1 [On-Line Application](#)
- Select Reason for Filing “Test Well”
- Attach CSS Data Sheet
- Write in “**Purpose CCS**” in the Comments section of the GW-1 form
- Follow online GW-1 prompts and complete form.
- Issued GW-2 will include Base of Usable Quality Water (BUQW) [3K TDS base of water] and Underground Sources of Drinking Water (USDW) [10K TDS] base of water Statements
- No Isolation Statements or No Harm language shall be included
- No Charge for ordering the GW-2 Test Well letters
- Multiple GW-1 and GW-2 letters may be required if well are far apart or hydrogeology is complex

### **Phase II**

#### **A single Class VI GAU No Harm Letter Required for the Facility after the SIP Review is Completed:**

**Activity:** All operator, drilling, testing, and permit review have been completed, Application finalized, SIP Application review completed, A Permit to Inject is needed and the only remaining deficiency is a **No Harm Letter**.

GAU Review & Facility No Harm Letter is required:

- SIP notifies operator that No Harm letter is the only remaining deficiency before issuing an injection permit
- Order Reason for Filing “Class VI (CCS)” after SIP has completed their review and notified applicant
- GAU will return Class VI (CCS) requests submitted before SIP reviews are complete, for resubmission later
- Login to GW-1 [On-Line Application](#)
- Select Reason for Filing “**Class VI (CCS)**”
- Attach CSS Data Sheet
- When the SIP CCS review is complete and the only deficiency is “No Harm” letter, SIP sends email notification to Operator and cc: [GAU@rrc.texas.gov](mailto:GAU@rrc.texas.gov).
  - Subject line and Body of letters contains: **County, Operator Name, Lease Name, CCS Control Number, and Live Link to current version of Operators CCS Application on internal drive**
- Operator then submits or resubmits Reason for Filing “**Class VI (CCS)**” No Harm” GW-1 request

#### **NOTE:**

- SIP CCS Review must be completed, and the only deficiency is the “No Harm” Letter
- A separate GAU Workstation Review, hosted by the operator, is required prior to issuance of “No Harm”
- A Separate review of the CCS Application will be conducted by the GAU
- **No Harm** Language is Required and will be provided if applicable
- No Groundwater depths or Isolation statements are provided or needed in GW-2 Facility “No Harm” Letters