



LOUISIANA CLASS VI PERMITTING PROCESS

Louisiana Class VI permits are managed through the C&E Office of Permitting and Compliance – Engineering Division. The entire purpose of the Class VI program (as with all injection permits) is to ensure that anything injected below ground **CANNOT** impact or contaminate underground freshwater zones.

1 After initial submission and basic administrative completeness check, the application is placed in the queue until staff is ready to begin technical review.

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- The next stage is technical review, where science staff evaluate the information submitted in the application:
 - How the CO₂ interacts with the injection zone rock and where the CO₂ plume is going to move
 - Confining layers that seal the injection zone
 - Casing/cement materials
 - Planned injection pressures and rates
 - Chemistry and makeup of the planned CO₂ stream
 - Chemistry of injection zone and potential impact on CO₂ and well materials
 - Existing wells that penetrate below base of freshwater aquifer (active, plugged, orphaned), whether they be water wells or oil/gas/injection wells
- During review, C&E sends the applicant multiple requests for additional information to further evaluate and update the application – this period is estimated to last a minimum of 18 months.

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- When the application is deemed technically complete, C&E publishes a draft permit and opens public comment/public hearing.
- All comments, written or spoken, are reviewed with equal weight, and all relevant comments receive responses, either directly or to multiple comments raising the same point.

4 Once all comments have been reviewed/responded to and any newly raised substantive questions addressed by applicant, C&E issues the final permit decision.

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- If overall permit is approved, a permit to construct is then issued.
- Once well is drilled, applicant must submit post-drill updates to impacted areas of application.

6 C&E then reviews that update and makes decision on final permit to inject.
Note: Major changes from planned to as-drilled well would require a new draft permit and public comment process.