

STATE OF UTAH

**DEPARTMENT OF NATURAL RESOURCES
OIL, GAS, AND MINING DIVISION**



CLASS VI US EPA PRIMACY APPLICATION

UNDERGROUND INJECTION CONTROL PROGRAM

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**UTAH
CLASS VI
UNDERGROUND INJECTION CONTROL PROGRAM (1422)
DESCRIPTION**

Utah Division of Oil, Gas, and Mining

Class VI Underground Injection Control Program Description

I. Introduction

The Utah Department of Natural Resources (UDNR), Division of Oil, Gas, and Mining (“Division”) has been granted enforcement authority over Class II injection wells – excluding Indian lands – by the U.S. Environmental Protection Agency (EPA) under Sections 1422 and 1425 of the Safe Water Drinking Act (SDWA) in 1982. Since then, the Utah Underground Injection Control (UIC) Program has been working to implement the approved program, relevant rules, regulations, and EPA directives. References in this Work Plan to “we,” “us,” or “our” are intended to mean the Division. The term “the Board” or “Board” refers to the Utah Board of Oil, Gas and Mining.

On December 10, 2010, the EPA established minimum federal requirements for underground injection of Carbon Dioxide (CO₂) under the SDWA, creating a new class of injection wells known as Class VI. The Class VI rule builds on the UIC regulatory framework but includes specific modifications to address the unique nature of CO₂ injection. The purpose of the Class VI rule is to ensure that the geologic storage of CO₂ is conducted in a manner that protects the underground sources of drinking water (USDW). The Division is revising the existing 1425 program to include oversight for Class VI CO₂ geologic sequestration (GS) wells.

To assume primary enforcement responsibility for Class VI injection wells, the Division must demonstrate that the Utah UIC Program with Class VI oversight, meets or exceeds federal standards. In accordance with the provisions of Utah’s Administrative Rulemaking Act (Title 63G, Chapter 3) and state laws, the Division has adopted Utah Administrative Code Title R644 to facilitate the permitting, siting, construction, operation, monitoring, and site closure of Class VI injection wells used to inject CO₂ for GS.

This revised program description incorporates changes as required under federal regulations and serves as an addendum to the existing Utah 1425 UIC primacy authority. Nothing in this document in any way affects the current administration of the Class II Program under Sections 1422 and 1425 of the SDWA. This revision to the Utah 1425 UIC Program is for the sole purpose of adding Class VI injection wells to the program.

II. Overview of the State UIC Program

The applicable UIC Class II Program related to oil and gas activities is authorized under the Safe Drinking Water Act (SDWA) Section 1422 and 1425. The primary focus of the UIC Program under the SDWA is the protection of USDWs. The Federal definition of a USDW is an aquifer or any portion of an aquifer that supplies a public water system or contains a sufficient quantity of groundwater to supply a public water system, and currently supplies drinking water for human

consumption, or contains fewer than 10,000 milligrams per liter (mg/L) of total dissolved solids (TDS) and is not an exempted aquifer.

A USDW is defined as those aquifers or portions thereof that meet the definition at 40 Code of Federal Regulations (CFR) §144.3 as of November 15, 1984.

The Division is revising the existing 1425 Program to include Program oversight for Class VI CO₂ GS wells. The EPA promulgated federal requirements under the SWDA for the underground injection of CO₂ in 2010, establishing a new class of injection wells (Class VI). The purpose of the Class VI Rule is to ensure that the geologic storage of CO₂ is conducted in a manner that protects USDWs. This submission will demonstrate that the Utah UIC Program with Class VI oversight is at least as stringent as its federal counterpart. In accordance with the provisions of Utah's Administrative Rulemaking Act, Title 63G, Chapter 3, and through the power delegated under the laws of the state of Utah, the Division adopted the Utah Administrative Code Title R644 to facilitate the permitting, siting, construction, operation, monitoring, and site closure of Class VI injection wells used to inject CO₂ for GS.

The Division is the sole implementation agency for our current primacy Program for Class II; this will continue as Class VI wells are added to the Program.

1. State Priorities for Issuing Class VI Permits

It is anticipated that 3 applications may be received and 1 permit may be issued during the first 2 years after approval of the state Class VI Program. Priority in the application queue will be based primarily on the relative date of submittal and then weighted by application completeness and size and nature of the project. Priority will also be given to storage operators who apply for a permit to store CO₂ produced in Utah.

III. Division Organization and Structure

A. General Responsibilities

The Division has the statutory and regulatory authority to regulate Class VI Injection well activities under Title 40, Chapter 11, Geologic Carbon Storage and Title R644, Carbon Sequestration respectively.

The Division has the following responsibilities specific to its associated statutory authority:

1. Administer the rules and regulations as they pertain to subsurface injections as outlined by Subsection R644-2-1(2).
2. Perform technical evaluations of injection well applications and prepare draft permits as outlined by Subsection R644-6-2(1).
3. Issue, deny, modify, or terminate permits as outlined by Section R644-6-1.
4. Witness, at the discretion of the permitting agency, any aspect of construction, testing, operation, and closure of injection well activities as outlined by Subsection R644-5-4(5)(c),

Subsection R644-5-6(2), and Subsection R644-9-2(6).

5. Perform onsite inspections of permit requirements as outlined by Subsection R644-4-3(4)(f).
6. Review operation reports for permit or rule compliance as outlined by Subsections R644-5-7(1), R644-7-1(3), R644-7-2(1)(e)(vi), R644-14-1(6), R644-15-1, and R644-17-1(2)(c).
7. Maintain a database of injection well information, including quantity and quality of injected material, well construction, local geology, and the pertinent water resources that could be impacted as outlined by Section R644-9-2, Section R644-11-1, and Section R644-15-1.
8. Provide recommendations for compliance strategies and corrective action when violations occur as outlined by Section R644-18-1.
9. Initiate and pursue appropriate enforcement action when the permit or rule requirements are violated as outlined by Section R644-18-2.
10. Conduct public hearings or enforcement proceedings as required. The Board shall hold a public hearing before authorizing the Division to issue a permit as outlined in Section R644-6-3.
11. Respond to public inquiries and complaints regarding proposed or operating injection facilities as outlined in Section R644-6-3.
12. Ensure that the regulated community and the public at large are informed about underground injection activities as outlined in Section R644-6-3.
13. Maintain permit files, including information on the geology and hydrology (e.g., depth, name, and quality of USDWs) in the vicinity of the injection wells, along with other data submitted with the application as outlined in Section R644-15-1.
14. Ensure that the permitted facility maintains financial assurance through the life of the permit and reclamation period as outlined in Section R644-5-3.

B. Specific Responsibilities

The Division has responsibility for the protection of groundwater resources and regulatory authority for Class II injection activities within the State. In addition to these responsibilities, and upon EPA approval, the Division will administer all regulatory authority for Class VI injection well activities. The Division is responsible for the following tasks and statutory obligations:

1. Administration of the Class II UIC Program.
2. Administration of Class VI UIC Program.
3. The administration of oil, gas, and mining regulations and guidelines governing oil and gas drilling and production in Utah.

The mission of the Division is to foster responsible development, production, and reclamation of Utah's natural resources to benefit present and future generations. We are committed to achieving this mission through sound regulatory practices, effective stakeholder engagement, and proactive environmental stewardship.

Staff in the Division's Class VI UIC Program Division (Figure 1) have the education, skills, and in-house experience with technical and policy areas relevant to evaluating Class VI permit applications, including, but not limited to, evaluating and issuing Class VI permits, onsite inspection, compliance monitoring, and overseeing GS projects throughout their life span. The state plans to implement a "team" approach to permitting by dividing permit applications among staff with relevant areas of expertise. However, some third-party contractor experience with modeling, and risk analysis will be needed in the early stages of the Program. It is anticipated that third-party modelers will be utilized during the permit review stages at the onset of primacy, but as Division staff are trained and gain experience, reliance on third-party modelers will become minimal. Third-party risk analysts may need to be contracted as needed since the Division does not currently have expertise in this area, and it is uncertain whether staff will obtain such experience in the future. The table below identifies the sources of expertise:

Expertise Area	In-House	Contractor*
Site characterization , e.g., geologists, hydrogeologists, geochemists, and log analysts/experts to review site characterization data submitted during permitting and throughout the project duration.	✓	
Modeling , e.g., hydrogeologists and environmental/reservoir modelers to evaluate the area of review (AoR) delineation computational models during permitting and AoR reevaluations.	✓	✓
Well construction and testing , e.g., well engineers, log analysts/experts, and geologists to review well construction information and operational reports on the performance of Class VI wells and review/evaluate testing and monitoring reports.	✓	
Finance experts to review financial responsibility information during permitting and annual evaluations of financial instruments.	✓	
Risk analysts to evaluate emergency and remedial response scenario probabilities and remediation cost estimates.		✓
Policy/regulatory experts on the UIC Program and the Class VI Rule to	✓	

evaluate compliance with Class VI Rule requirements.		
Enforcement/compliance , e.g., staff who can initiate and pursue appropriate enforcement actions when permit or rule requirements are violated.	✓	
Inspectors , including well engineers or log analysts/experts, to inspect wells or witness construction activities, workovers, and/or mechanical integrity tests.	✓	
* The University of Utah Energy Geoscience Institute (EGI) is the contractor for all geoscience disciplines if needed for relevant expertise.		

Funding for the Class VI Program will derive from fees levied according to the provisions of Utah Code Title 40, Chapter 11, federal UIC Class VI Primacy grant and state permit and operating general funds. Fee amounts have been set by the Division as detailed in the table below.

Year	Class VI Primacy Grant	Fee Assessments					
		Application	Annual	Injection (\$0.08/ton)*	Test Well	5-yr renewal	
Post-Year 2	\$ 1,158,000.00	\$ -	\$ 60,000.00	\$ 24,000.00	\$ -	\$ 16,000.00	
5-Year Total	\$ 1,930,000.00	\$ 345,000.00	\$ 80,000.00	\$ 32,000.00	\$ 60,000.00	\$ 16,000.00	\$ 2,463,000.00
						5-Year Total	\$ 3,668,000.00

* = Estimation of 100,000 tons injected annually.

The estimated costs for the first two years of implementing the Utah Class VI UIC Program will range from approximately \$459,821.20 to \$1,205,000.00. The costs will be covered by a combination of grant funds and collected fees. These costs include technical and administrative staff salaries, in-state travel necessary for field inspection work and administering the program, out-of-state travel for conference participation and training, and supplies.

Anticipated Costs to Administer Class VI UIC in the State of Utah					
Year	Personnel		Travel		Supplies
	Technical	Administrative	In-State	Out-of-State	
Year 1	\$ 69,409.60	\$ 101,920.00	\$ 30,285.00	\$ 9,376.00	\$ 37,840.00
Year 2	\$ 69,409.60	\$ 101,920.00	\$ 30,285.00	\$ 9,376.00	
2-Year Total	\$ 138,819.20	\$ 203,840.00	\$ 60,570.00	\$ 18,752.00	\$ 37,840.00
Total Costs for First Two Years					\$ 459,821.20

The Carbon Dioxide Storage Fund (CDSF) is the primary source of program funding. Sources of monies to be deposited into this fund pursuant to UC 40-11-23(2) include annual regulatory fees, application fees, and compliance fines. The Class VI Program will draw funding from the CDSF as needed.

Anticipated Funding Sources to Administer Class VI UIC in the State of Utah							
Year	Class VI Primacy Grant	Fee Assessments					Annual Fee Total
		Application	Annual	Injection (\$0.08/ton)*	Test Well	5-yr renewal	
Year 1	\$ 386,000.00	\$ 115,000.00	\$ -	\$ -	\$ 20,000.00	\$ -	\$ 135,000.00
Year 2	\$ 386,000.00	\$ 230,000.00	\$ 20,000.00	\$ 8,000.00	\$ 40,000.00	\$ -	\$ 298,000.00
2-Year Total	\$ 772,000.00	\$ 345,000.00	\$ 20,000.00	\$ 8,000.00	\$ 60,000.00	\$ -	\$ 433,000.00
First Two Years Totals							
Primacy Grant							\$ 772,000.00
Fee Assessments							\$ 433,000.00
Total Funding for First Two Years							\$ 1,205,000.00

Fees collected to administer the Program are as follows: (1) application fees, (2) annual facility regulatory fees, (3) a tonnage fee charged per metric ton of injected CO₂, (4) a 5 year permit renewal fee, and (5) Class VI Geophysical test well fees. The Program anticipates sufficient funding and any excess will be placed in the CDSF to provide for ongoing Program needs.

UIC Class VI Storage Facilities

Fee Type	2026 Costs	Comments
Application fee	\$115,000 per facility	Includes one well
Additional Wells (no limit)	\$25,000 per additional well	In addition to application fee
Annual Fee	\$20,000 per year	Per well
Per Ton Fee	\$0.08 per ton	Used for long term post closure monitoring, remediation and unforeseen costs
CO2 Volume Determination Fee	\$125 per hour	Hourly rate charged when a determination of stored carbon dioxide is required per 40-11-20
5 Year Permit Review	\$16,000 per facility	Mandatory permit review every 5 years
Geophysical Test Well Fee	\$20,000 per well	Uses include: research, monitoring or conversion to Class VI Fee includes construction inspections

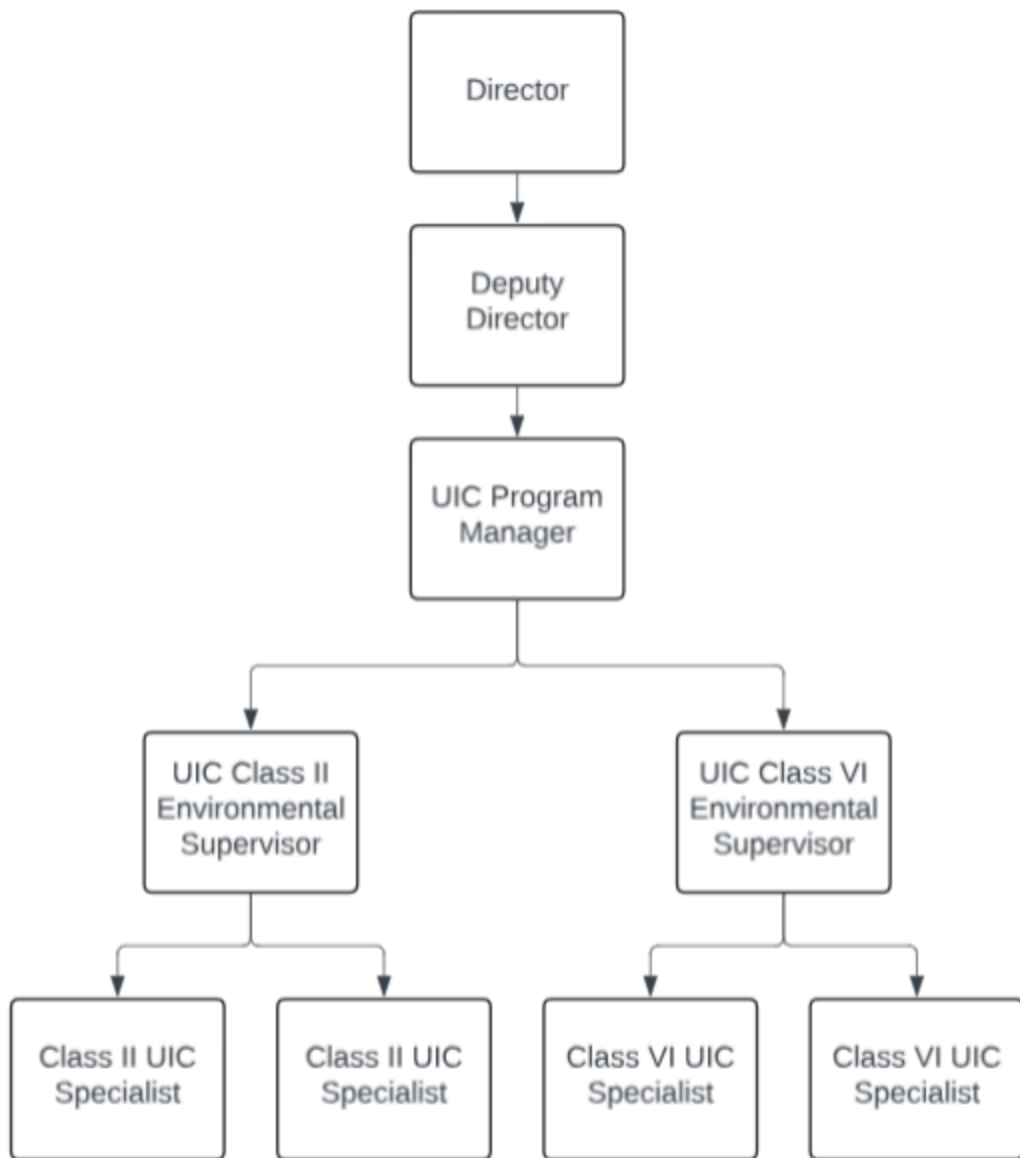


Figure 1. Utah Department of Natural Resources, Division of Oil, Gas, and Mining; Oil and Gas Program Organizational Chart

IV. State UIC Permitting Process

A. Class VI Injection Wells

The CO₂ Sequestration Facility permit application form will be Form UIC 20 and the well construction application will be Form 3, drafts of which are included in Section X (Forms). These forms will be used for the initial permit submitted as well as the permit re-evaluation. Permit re-evaluation will occur at a frequency of five years or less as prescribed by R644-8-3.(2).

Prior to the approval of injection, a testing and monitoring plan must be approved by the Division, per R644-13-1. The requirements of this plan will be reported as follows:

1. The operator will report the analysis of the CO₂ stream as required in R644-13-1(1)(a).
2. The operator will submit pressure, rate, and volume monitoring data as required in R644-13-1(1)(b) including the raw data as required in R644-15-1(1)(a)(viii).
3. The operator will submit corrosion monitoring data as required by R644-13-1(1)(c).
4. The operator will submit groundwater data for any confining zones as required by R644-13-1(1)(d).
5. A Form 9 (Section X. Forms) must be submitted prior to conducting an external or internal mechanical integrity test (MIT), casing inspection log, or pressure fall-off test as stipulated in the approved monitoring and testing plan and required under R644-9-2(1)(d), R644-13-1(1)(e), and R644-13-1(1)(f).
6. The operator will report air monitoring and soil gas monitoring that could endanger a USDW as required in R644-13-1(1)(h) and any additional monitoring as required in R644-13-1(1)(i).

Monitoring reports in accordance with the approved plan must be submitted semi-annually as prescribed in R644-15-1.(1)(a), with certain reports, including MIT results, submitted within 30 days of the test per R644-15-1.(1)(b); and with a report of any non-compliance submitted within 24 hours per R644-15-1.(1)(d).

MITs will be conducted frequently throughout the life of a well. When Form 9 is submitted to the Division, staff will review the scope of work and may request revisions prior to issuing an approved work permit. The operator will schedule with the Division the proposed MIT operation and upon completion, must submit a summary of work performed on Form 9.

Permitting Procedures

The state's Class VI Program requires all owners or operators seeking to inject CO₂ for the purpose of GS to obtain a Class VI permit to construct or convert a well and gain approval to operate prior to commencing injection activities.

Class VI permit applications will be reviewed by staff of the Division and issued in accordance with Utah Administrative Code Title R644.

As part of the Class VI facility permit application, the operator must submit all required information according to R644, including: CO₂ Sequestration Facility Permit application (R644-3-1.(1)(a)), demonstration of suitable geology (R644-8-1.(1)), area of review delineation

and corrective action plan (R644-8-2.(2) and R644-8-3.(1)), injection well construction and operation specifications (R644-9-1.(1) and R644-11-1.(1)), documentation of logs, samples and required testing (R644-9-2.(1)), demonstration of mechanical integrity (R644-14-1.(1)), a testing and monitoring plan (R644-13-1.(1)), an injection well-plugging plan (R644-16-1.(1)), a post-injection site care and closure plan (R644-17-1.(1)), an emergency and remedial response plan (R644-12-1.(1)), and a demonstration of financial responsibility (R644-5-3.(1)). Injection may not commence until well construction is complete, mechanical integrity has been demonstrated, and approval has been granted by the Division.

Reviewing Class VI Facility Permit Applications

When the Division receives a CO₂ Sequestration Facility permit application, staff will review it to determine whether it contains all of the information outlined in R644-4-3. The CO₂ Sequestration Facility application must include all information needed to review each individual proposed Class VI well for adherence to all R644 provisions. Any deficiencies will be noted, and if necessary, the Division will request additional information from the applicant.

After confirming that all of the required information was submitted with the permit application, Division staff will review the CO₂ Sequestration Facility permit application using a multi-step process, as described below.

First, staff will perform a technical review to determine that the submitted data are accurate and of a high quality, have undergone appropriate quality assurance procedures, are representative of the project and the site, and are sufficiently complete to support a full technical evaluation.

Next, a full technical evaluation of the submitted information will be performed to support the decision on the suitability of the site per the requirements at R644-8. This includes an evaluation of the geologic system (R644-8-1.(1)), the well (R644-9-1.(1)), and the proposed operations (R644-10-1.(1)) to ensure that the project will be protective of USDWs as well as the health, safety, and welfare of the public.

As needed throughout the permit application review process, Division staff will discuss the application with the owner or operator to ensure that needed information is provided as expeditiously as possible.

Public Participation, Technical Evaluation, and Draft Permit

Upon completion of the permit application evaluation, the Division will tentatively determine whether to prepare a draft permit or deny the application. If the Division prepares a draft permit, the Division will prepare a Statement of Basis summarizing the project (R644-6-2.(2)) and issue a public notice of the comment period and a public hearing according to procedures listed in R644-6-3.

Draft permits stipulations will specifically address the following rule provisions: R644-5-9, R644-9-1, R644-8-3, R644-11, R644-13, R644-5-3, R644-5-10. Other rule provisions may be required as determined necessary by the Division.

Public notice of the CO₂ Sequestration Facility permit application and draft permit shall allow at least thirty (30) days for public comment. During the public comment period, any interested person may submit written comments on the draft permit. Public notice of the public hearing

shall be given at least thirty (30) days before the hearing. A public hearing will be held before authorization of a permit. All relevant comments will be considered in making the final decision and will be addressed when a permit is issued or denied.

Public notice to known parties will be primarily through email. If no verifiable email address exists the Division will send public notices through mail.

The Division will also notify any states, tribes or territories within the area of review of the GS project and document the results of this consultation, pursuant to R644-6-3(3)(a)(iii) and as further discussed in the “Transboundary Notification and Documentation Procedures” section.

After completion of the public hearing and review of public comments, a final permitting decision will be made, and if appropriate, a CO₂ Storage Facility permit and any associated UIC Class VI well permits will be issued. The permits will authorize the applicant to construct the injection well or convert an existing well to Class VI. The Division will also issue a response to all relevant public comments received.

Parties have 2 appeal options to a final Board Order (1) They may file for reconsideration under Utah Code 63G-4-302 within 20 days of the order being issued, or (2) they have a right to seek judicial review by the Utah Supreme Court for the final order within 30 days of the order under Utah code 63G-4-401(3) and 403. Parties are also able to request a rehearing and modification of an existing order by the Board if filed no later than the 10th day of the month following the date of the signing of the final order, R641-110.

Following the receipt of a CO₂ Sequestration Facility permit, the operator will obtain a permit to drill, deepen, convert, operate, or upon demonstration of mechanical integrity, re-enter a previously plugged and abandoned well for storage purposes.

Approving Injection in a Class VI Well

Following well drilling/conversion and completion activities, the permit applicant will submit information that the Division will consider in determining whether to approve the operation of the injection well. If the information provided pursuant to R644-10-1.(1) warrants, the Division will authorize the applicant to inject CO₂.

An injection well may not commence injection until construction is complete, a notice of completion has been submitted to the Division, the Division has inspected or otherwise reviewed the injection well and finds it is in compliance with the conditions of the permit, and the division has given approval to begin injection.

After approval for injection is issued, the operator is required to submit monitoring data and reports according to R644-15-1.(1). After injection ceases, the operator shall plug their well(s) in accordance with the Well Plugging Plan submitted per R644-16 and after proper notice in accordance with R644-16-1.(4). Finally, a Well Closure Report will be submitted to the Division as required in R644-16-1.(5).

After cessation of injection but prior to plugging and abandonment of site wells, the operator must either (1) demonstrate that their Post Injection Site Care and Closure plan(s) are applicable, or (2) update the plan(s) as required in R644-17-1.(1)(c) in accordance with the requirements

listed in R644-17-1.(1)(b). Prior to authorization of site closure, the operator must monitor the site for at least 50 years or for the duration of the alternative timeframe approved by the Division pursuant to R644-17-1.(2)(a).

Finally, the operator must publish a notice of intent of closure in accordance with R644-17-1.(4), may plug all monitor wells after approval of site closure by the Division and submit a site closure report in accordance with R644-17-1.(5).

Plan Review of Permits

The Division will verify that the CO2 Sequestration Facility construction, completion, operation, maintenance, and closure procedures are performed according to approved plans and specifications and meet all permit or regulatory requirements. Verification of Class VI injection well activities is accomplished by reviewing appropriate plans and reports, performing on-site inspections, responding to complaints, and, where necessary, referring noncompliance to the enforcement group and/or legal counsel for appropriate enforcement action. Review of plans and reports may include but are not restricted to:

1. Revisions to construction plans filed after permit issuance.
2. Well completion reports, including results of required logging and other testing.
3. Results of injectivity and pump tests, MITs, and any other required tests.
4. Bottomhole pressure reports and updated evaluations of the effects of injection on the injection zone, including fluid volume, injection rate, and injection pressure data.
5. Workover plans and workover reports describing construction or maintenance.
6. Revisions to the plugging plan, reports of completion of plugging, and other site closure activities.
7. Any other plans or test results connected with the proper construction, operation, and maintenance of the well and associated surface facilities.

Mechanical Integrity Testing Requirements

To evaluate the absence of significant leaks, owners or operators of Class VI wells must, following an initial annulus pressure test, continuously monitor injection pressure, rate, injected volumes, pressure on the annulus between the tubing and long-string casing, and annulus fluid volume, pursuant to R644-11-1.(5). Additionally, annulus pressure tests must occur at least once every 12 months to a pressure equal to the maximum authorized injection pressure or to 1,000 psi, whichever is greater, pursuant to R644-14-1.(2).

At least once every 12 months, owners or operators must use an approved tracer survey or a temperature or noise log to determine the absence of significant fluid movement pursuant to R644-14-1.(3).

If required by the Division, at a frequency specified in the testing and monitoring plan required in R644-13-1.(1), the owner or operator must run a casing inspection log to determine the presence or absence of corrosion in the long-string casing.

The Division may require additional or alternative tests if the results presented by the operator are not satisfactory to demonstrate mechanical integrity pursuant to R644-14-1.(5). Also, the

Division may allow the use of a test to demonstrate mechanical integrity other than those described in R644-14-1.(1), with the written approval of the EPA Administrator. To obtain approval, the Division must submit a written request to the EPA Administrator that must set forth the proposed test and all technical data supporting its use.

The Division expects to review the results of all MITs from Class VI wells each year.

Exempted Aquifers

Operators of Class II enhanced oil recovery (EOR) wells may apply to expand the areal extent of Class II aquifer exemptions. Such requests must be submitted concurrently with Class VI permit applications, pursuant to R644-2-4.(2).

If such requests are received, the Division will evaluate the application to determine that the area of the proposed expansion is sufficiently large to contain the CO₂ plume and pressure front and was determined in a manner that is consistent with the AoR modeling required under R644-8-2.(1) and whether the request meets the criteria at 40 CFR 146.4.

Following this evaluation and a determination that the proposed expansion of the areal extent of the aquifer exemption meets the requirements at 40 CFR 144.7(d) and 146.4, the Division will forward the request to the EPA Region 8. No designation of an expansion of the areal extent of a Class II EOR aquifer exemption for Class VI injection will be final unless approved by the EPA Administrator as a revision. Other than EPA-approved expansions of the areal extent of existing Class II aquifer exemptions, no aquifer exemptions will be issued for Class VI injection-related activities.

Financial Responsibility

R644-5-3.(1) requires operators of Class VI wells to demonstrate and maintain financial resources to perform all required corrective action, plug the injection well, conduct post-injection site care and site closure, and perform any needed emergency and remedial response.

Division staff with financial expertise will review the cost estimates provided by applicants to verify that they are sufficient to cover these activities and evaluate the financial instruments the applicant proposes to use to verify that they qualify and are appropriate. Cash accounts and certificates of deposit will only be accepted up to FDIC insured amounts. The Division will consult the recommendations of EPA's Class VI Financial Responsibility Guidance when evaluating financial instruments.

Even after the financial instruments have been approved, Division staff will ensure the operator does the following: (1) annually updates financial surety to account for inflation; (2) updates cost following changes to geologic sequestration project; and (3) oversee financial instruments to make sure they remain active, sufficient, and meet the criteria required pursuant to R644-5-3.(1)(a).

Transboundary Notification and Documentation Procedures

Due to the potentially large AoRs associated with GS projects, transboundary issues may need to be taken into account. Pursuant to R644-4-3.(3), the Division will notify authorities in any states, tribes, and territories of CO₂ Sequestration Facility permit applications where the AoR crosses jurisdictional boundaries.

Permit applicants must provide a list of contacts for those states and tribes identified to be within the AoR of the Class VI project pursuant to R644-4-3.(1)(bb).

Based on this information and a review of the extent of the AoR, the Division will notify appropriate staff in affected jurisdictions in writing to provide information about the proposed project and invite them to provide input during the permit application review process or participate in or monitor the public participation process associated with the permit application.

The Division will document all input received and the responses provided. This documentation will be made a part of the administrative record for the permit application.

Injection Depth Waivers

The Division will not approve nor issue injection depth waivers.

B. State Compliance Monitoring

Compliance monitoring will, at a minimum, include on-site inspections conducted by authorized agents of the Division and a review of operating and monitoring reports submitted in compliance with R644-15-1.(1) to verify that the construction, completion, operation, maintenance, and site closure (R644-17-1.(1)) of a CO₂ Sequestration Facility are performed according to approved plans and specifications and meet all permit and regulatory requirements.

The state's compliance monitoring program includes the following activities:

- Reviewing plans and reports (e.g., well completion reports, test results, workover reports) submitted by permit applicants.
- Conducting site inspections to verify or witness construction, operation and testing/maintenance procedures. Site inspections will be conducted by the Division's authorized agents.
- Investigating complaints alleging improper construction, completion, operation, or maintenance of a GS project.
- Performing compliance monitoring (e.g., reviewing monitoring, operating and maintenance data) to verify compliance with permit conditions, regulations, and any other conditions or stipulations of the facility and construction permit.
- Conducting annual inspections and compliance follow-up inspections of GS projects.
- Responding to citizen complaints.

The Division may revoke and reissue or terminate a permit due to non-compliance with the terms and conditions of the permit, failure to disclose fully all relevant facts or misrepresenting relevant facts, or a determination that the activity endangers human health or the environment and can only be regulated by permit modification or termination. Non-compliance with permit conditions is a violation of regulations and is grounds for enforcement action, including permit termination, revocation, or modification.

Annual site inspections will be conducted to observe and document the condition of the injection site, facilities, and monitoring wells; and to review Class VI permit conditions and facility

records to determine compliance with any plans or permit conditions. Additional site inspections may be conducted to verify or witness construction, operation, and maintenance procedures, or in response to a complaint or other indication that a problem may exist. Construction elements and testing that may be witnessed by the Division include:

1. Well pad and site construction.
2. All drilling and well completion operations.
3. Pressure testing of tubing and casing.
4. Formation pressure tests, injectivity tests, or pump tests.
5. Installation and maintenance of instrumentation.
6. Work required by any corrective action plan.
7. Well workovers.
8. Placement of monitoring wells or other equipment.
9. Any plugging procedures.
10. Mechanical integrity testing.

Violations of any permit conditions noted during an inspection will be referred for enforcement action.

V. Utah Enforcement Procedures

Any person violating Utah Administrative Code Title R644, any condition of a CO₂ Sequestration Facility permit, or any rule or order of the Division is subject to enforcement action. The Division is responsible for initiating, pursuing, and resolving enforcement actions.

Enforcement proceedings may result in the modification, revocation, or suspension of any permit issued under authority of the UIC Program.

If the Division determines that a violation exists that does not cause imminent danger or harm, the Division may issue a notice of violation to the operator fixing a reasonable time, not to exceed 90 calendar days, for the abatement of the violation and providing opportunity for a hearing before the Division. The Division will terminate a notice of violation by written notice to the operator when the Division determines that violations listed in the notice of violation have been abated. When a notice of violation has been issued and the operator fails to abate the violation within the abatement period, then the Division shall issue a Division enforcement order.

If an administrative penalty is required, the state may seek civil penalties up to \$5,000 per day per violation under R644-18-3. Criminal fines of \$5,000 per day may also be recoverable.

VI. Schedule for Issuing Class VI Permits

Currently, there are no Class VI injection wells permitted by the EPA within Utah. The Division anticipates that at least three well permit applications may be submitted during the first two years after approval of the state Class VI Program. Each permit application will be reviewed for compliance with applicable state statutes, regulations, and permitting requirements and for the adequacy of protection of USDWs.

The Division expects that reviewing CO₂ Sequestration Facility permit applications will require eight to twelve months per project, following the date a complete permit application is submitted, under proposed staffing levels and with full applicant cooperation. It is expected that interest in

CO₂ injection permits will increase after Utah is granted primacy due to energy production, interest in CO₂ as a commodity, and in relation to the regulation of CO₂ emissions.

VII. Procedures to Notify Operators of the Requirement to Apply for and Obtain a Permit

1. Class II EOR Wells

The Division will evaluate information about Class II EOR wells (e.g., CO₂ injection and production data or information related to the other factors at R644-2-5.(2) and identify whether any projects are approaching risk thresholds within four years of receiving Class VI primacy, in accordance with 40 CFR 145.23(f). Because the Division has primacy for both the 1422 and 1425 Programs, no interagency cooperation will be required to convert a Class II well to a Class VI well.

If such increased risk is present, the Division will contact the owners or operators of these wells and inform them that they must apply for a Class VI permit. Division staff will provide information about the state's Class VI regulation and about applying for a Class VI permit pursuant to R644-2-5. Permitting of these wells will be conducted as described in Section IV above.

VIII. Injection Well Inventory

Division staff currently enter new well information into Division databases: RBDMS, Live Data, and Data Explorer. As modifications to wells occur during the operational lifetime of each well, the information contained in RBDMS, Live Data, and Data Explorer is updated accordingly. Data queries are executed to export well inventories for all well class types, and Class VI wells will be no exception.

IX. Reports

The operator is required to submit all required reports, submittals, and notifications under R644-15-1.(1) to both the Division and to EPA, in an electronic format. Upon request, the Division will assist EPA in operator compliance with 40 CFR §146.91(e) by providing the EPA all required reports, submittals, and notifications under Subpart H of part 146.

1. Semi-Annual Reports

The Division shall submit to the EPA semi-annual 7520 reports as specified in 40 CFR § 146.91. Reports will be submitted in accordance with the following schedule (or as otherwise specified in the Division's Fiscal Year UIC Workplan):

- Fiscal year mid-year reporting period begins April 1 – due May 15
- Fiscal year end of year reporting period begins October 1 – due November 15

X. Forms

The Division will utilize its database throughout program implementation. The database will allow the Division to track all program reports, streamline permitting and reporting, and maintain all permit files associated with the Class VI Program. Application and reporting forms to be used during program implementation follow this page.

APPLICATION TYPE:	<input type="checkbox"/> New Class VI Injection Well		
	<input type="checkbox"/> Class VI Geophysical Test Well	Planned Conversion Usage:	

APPLICANT INFORMATION			
1. OPERATOR NAME:		2. OPERATOR PHONE:	
3. OPERATOR ADDRESS:		5. FACILITY ADDRESS (if applicable):	
4. OPERATOR EMAIL:			
6. CONTACT NAME:		7. CONTACT NUMBER:	

WELL INFORMATION			
8. WELL NAME:		9. WELL NUMBER:	
10. COUNTY:		11. FIELD:	
12a. LOCATION OF WELL:	FOOTAGES	UTM EASTING, NORTHING	
SURFACE			
K.O. POINT			
PROD. INT.			
TD			
12b. LOCATION OF WELL:	NAD 27	NAD83	
SURFACE			
K.O. POINT			
PROD. INT.			
TD			
13. QTR/QTR, SECTION, TWSHP, RANGE, MERIDIAN, COUNTY:			

14. WELL CONSTRUCTION INFORMATION						
CASING SIZE (IN.)	HOLE SIZE (IN.)	CASING WEIGHT (lb/ft)	DEPTH SET		TOTAL CEMENT USED (sacks)	TYPE CEMENT/ YIELD (ft ³ /sack)
			TOP (FT.)	BOTTOM (FT.)		
15. ELEVATION OF DATUM (ft.):		16. DATUM:	<input type="checkbox"/> KB	<input type="checkbox"/> GL	<input type="checkbox"/> MSL	17. TOTAL DEPTH (ft.):

PROPOSED INJECTION INTERVAL INFORMATION			
18. DEPTH OF PROPOSED INJECTION ZONE (ft.):		19. INJECTION FORMATION NAME:	
Top:		Bottom:	
20. INJECTION THROUGH:		<input type="checkbox"/> Perforations	<input type="checkbox"/> Open Hole <input type="checkbox"/> Screen
21. PROPOSED PERFORATED/OPEN HOLE INTERVAL(S) (ft.):			
PROPOSED INJECTION STREAM INFORMATION			
22. PROJECTED AVERAGE MONTHLY INJECTION VOLUME (tons):		23. PROJECTED TOTAL INJECTION VOLUME (tons):	
24. FACILITY SIC CODES:			

25. SITE PERMITS		
PERMIT TYPE	APPLICATION NUMBER	CURRENT STATUS
26. LIST RELEVANT UTAH DEPARTMENT OF NATURAL RESOURCES ORDERS:		

JURISDICTIONAL ACKNOWLEDGEMENTS	
27. IS THE FACILITY LOCATED ON INDIAN LANDS UNDER THE JURISDICTION OF PROTECTION OF THE FEDERAL GOVERNMENT?	<input type="checkbox"/> YES <input type="checkbox"/> NO
28. IS THE FACILITY LOCATED ON STATE WATER BOTTOMS OR OTHER LANDS OWNED BY OR UNDER THE JURISDICTION OF THE STATE?	<input type="checkbox"/> YES <input type="checkbox"/> NO

CERTIFICATION BY OPERATOR	
<p>Any permit application must be signed as follows:</p> <ul style="list-style-type: none"> (i) For a corporation by a principal executive officer of at least the level of vice president; (ii) For a partnership or sole proprietorship by a general partner or the proprietor, respectively; (iii) For a Limited Liability Company (LLC) by a duly-authorized member or representative; or (iv) For a municipality, state, federal, or other public agency by either a principal executive officer or ranking elected official. 	
<p><i>I certify under penalty of law that this document and each attachment was prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. The information submitted is, to the best of my knowledge and belief, true, accurate, and complete. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (R644-3-1(3)(d)).</i></p>	
1. NAME (PRINT)	2. TITLE (PRINT)

3. SIGNATURE

4. DATE

INSTRUCTIONS

This form shall be submitted in duplicate by the operator prior to the commencement of:

- drilling a new well,
- re-entering a plugged well,
- significantly deepening an existing well bore below the current bottom-hole depth,
- drilling horizontal laterals from an existing well bore,
- drilling hydrocarbon exploratory holes such as core samples and stratigraphic tests,
- any surface disturbance associated with any of the above.

This applies to all wells drilled within Utah, regardless of lease designation. Filings must also be made to applicable federal agencies for permits on Indian or federal leases.

The following information shall be included as part of the complete application:

- The telephone number of the person to contact if additional information is needed;
- A plat or map, preferably on a scale of one inch equals 1,000 feet, prepared by a licensed surveyor or engineer, which shows the proposed well location. For directional wells, both surface and bottomhole locations should be marked;
- A copy of the Division of Water Rights approval or the identifying number of the approval for the use of water at the drilling site;
- A drilling program containing the following information:
 - The estimated tops of important geologic markers;
 - The estimated depths at which the top and the bottom of anticipated water, oil, gas, or other mineral-bearing formations are expected to be encountered, and the owner's or operator's plans for protecting such resources;
 - The owner's or operator's minimum specifications for pressure control equipment to be used and a schematic diagram thereof showing sizes, pressure ratings or API series, proposed testing procedures and testing frequency;
 - Any supplementary information more completely describing the drilling equipment and casing program as shown on this form;
 - The type and characteristics of the proposed circulating medium or mediums to be employed in drilling, the quantities and types of mud and weighting material to be maintained, and the monitoring equipment to be used on the mud system;
 - The anticipated type and amount of testing, logging, and coring;
 - The expected bottomhole pressure and any anticipated abnormal pressures or temperatures or potential hazards, such as hydrogen sulfide, expected to be encountered, along with contingency plans for mitigating such identified hazards;
 - Any other facets of the proposed operation which the lessee or operator desires to point out for the division's consideration of the application.
- A Form 5, Designation of Agent or Operator, if the operator is a person or company other than the lease owner.

Approval of the APD shall be valid for a period of 12 months from the date of such approval. Upon approval of an APD from the Division a well will be assigned an API number by the division. **The API number should be used to identify the permitted well in all future correspondence and reporting to the division.**

If a change of location or drilling program is desired, an amended APD shall be filed and its approval obtained from the Division. After a well has been completed or plugged and abandoned, it shall not be reentered without the operator first submitting a new APD and obtaining the division's approval from the Division.

Information on a newly permitted well will be held confidential only upon receipt by the division of a written request from the owner or operator. The period of confidentiality may begin at the time the APD is submitted for approval if a request for confidentiality is received at that time, although the information on the application itself will not be considered confidential. All correspondence and reports pertaining to the permitted well should be clearly stamped 'confidential' or 'tight hole'.

Send to:
Utah Division of Oil, Gas and Mining
1594 West North Temple, Suite 1210
Box 145801
Salt Lake City, Utah 84114-5801

Phone: 801-538-5340

Fax: 801-359-3940

ATTACHMENTS

VERIFY THE FOLLOWING ARE ATTACHED IN ACCORDANCE WITH THE UTAH OIL AND GAS CONSERVATION GENERAL RULES:

WELL PLAT OR MAP PREPARED BY LICENSED SURVEYOR OR ENGINEER

EVIDENCE OF DIVISION OF WATER RIGHTS APPROVAL FOR USE OF WATER

COMPLETE DRILLING PLAN

FORM 5, IF OPERATOR IS PERSON OR COMPANY OTHER THAN THE LEASE OWNER

VERIFY THE FOLLOWING ARE ATTACHED IN ACCORDANCE WITH THE UTAH OIL AND GAS CONSERVATION 644 RULES:

WELL PLAT OR MAP PREPARED BY LICENSED SURVEYOR OR ENGINEER

EVIDENCE OF DIVISION OF WATER RIGHTS APPROVAL FOR USE OF WATER

COMPLETE DRILLING PLAN

APPENDIX A, IF GEOPHYSICAL TEST WELL IS BEING PROPOSED

An operator may drill a geophysical test/exploration well that is not associated with a currently planned facility through the normal APD process. If the well is not designed appropriately, the operator takes the risk of needing remedial action on the well prior to getting Conditional Approval to drill additional wells associated with the facility and Approval to Operate for a future Facility Permit which includes the new well in the AOR. It is also possible that additional data may be required by the director for the facility permit – e.g. logs, etc. which may require additional work or another geophysical test well.

The well that was drilled as a test/exploration well may be converted to a Class VI well if it is included in a Facility Permit in the future and the design is approved – e.g. cement, casing, depths, etc.

If the well is not a part of a conditionally approved facility, the Class VI team will not review or comment on the design.

NAME (PLEASE PRINT) _____

TITLE _____

SIGNATURE _____

DATE _____

(This space for State use only)

API NUMBER ASSIGNED: _____

APPROVAL: _____

4. APPENDIX A: GEOPHYSICAL TEST WELL INFORMATION

PROPOSED INJECTION INTERVAL INFORMATION (IF APPLICABLE)						
1. DEPTH OF PROPOSED INJECTION ZONE (ft.):			2. INJECTION FORMATION NAME:			
Top:		Bottom:		3. INJECTION THROUGH:	<input type="checkbox"/> Perforations	<input type="checkbox"/> Open Hole <input type="checkbox"/> Screen
4. PROPOSED PERFORATED/OPEN HOLE INTERVAL(S) (ft.):						
INJECTIVITY TEST INFORMATION (IF APPLICABLE)						
5. TEST MATERIAL (e.g. nitrogen, brine, etc.)			6. MAXIMUM TEST PRESSURE (psi):		7. TOTAL INJECTION VOLUME (barrels):	
CO2 is prohibited as a Class V test material						

INSTRUCTIONS

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- re-entering a plugged well,
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- drilling horizontal laterals from an existing well bore,
- drilling hydrocarbon exploratory holes such as core samples and stratigraphic tests,
- any surface disturbance associated with any of the above.

This applies to all wells drilled within Utah, regardless of lease designation. Filings must also be made to applicable federal agencies for permits on Indian or federal leases.

The following information shall be included as part of the complete application:

- The telephone number of the person to contact if additional information is needed;
- Mineral lease number (item 5);
- Identification of the type of surface ownership – Federal, Indian, State or Fee (item 6);
- A plat or map, preferably on a scale of one inch equals 1,000 feet, prepared by a licensed surveyor or engineer, which shows the proposed well location. For directional wells, both surface and bottomhole locations should be marked;
- A copy of the Division of Water Rights approval or the identifying number of the approval for use of water at the drilling site;
- A drilling program containing the following information:
 - The estimated tops of important geologic markers;
 - The estimated depths at which the top and the bottom of anticipated water, oil, gas, or other mineral-bearing formations are expected to be encountered, and the owner's or operator's plans for protecting such resources;
 - The owner's or operator's minimum specifications for pressure control equipment to be used and a schematic diagram thereof showing sizes, pressure ratings or API series, proposed testing procedures and testing frequency;
 - Any supplementary information more completely describing the drilling equipment and casing program as shown on this form;
 - The type and characteristics of the proposed circulating medium or mediums to be employed in drilling, the quantities and types of mud and weighting material to be maintained, and the monitoring equipment to be used on the mud system;
 - The anticipated type and amount of testing, logging, and coring;
 - The expected bottomhole pressure and any anticipated abnormal pressures or temperatures or potential hazards, such as hydrogen sulfide, expected to be encountered, along with contingency plans for mitigating such identified hazards;
 - Any other facets of the proposed operation which the lessee or operator desires to point out for the division's consideration of the application.
- A Form 5, Designation of Agent or Operator, if the operator is a person or company other than the lease owner.

Approval of the APD shall be valid for a period of 12 months from the date of such approval. Upon approval of an APD, a well will be assigned an API number by the division. **The API number should be used to identify the permitted well in all future correspondence and reporting to the division.** If a change of location or drilling program is desired, an amended APD shall be filed and its approval obtained.

After a well has been completed or plugged and abandoned, it shall not be reentered without the operator first submitting a new APD and obtaining the division's approval.

Information on a newly permitted well will be held confidential only upon receipt by the division of a written request from the owner or operator. The period of confidentiality may begin at the time the APD is submitted for approval if a request for confidentiality is received at that time, although the information on the application itself will not be considered confidential. All correspondence and reports pertaining to the permitted well should be clearly stamped 'confidential' or 'tight hole'.

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Salt Lake City, Utah 84114-5801

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Fax: 801-359-3940

STATE OF UTAH
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

FORM 9

SUNDRY NOTICES AND REPORTS ON WELLS			5. LEASE DESIGNATION AND SERIAL NUMBER:
Do not use this form for proposals to drill new wells, significantly deepen existing wells below current bottom-hole depth, reenter plugged wells, or to drill horizontal laterals. Use APPLICATION FOR PERMIT TO DRILL form for such proposals.			6. IF INDIAN, ALLOTTEE OR TRIBE NAME:
1. TYPE OF WELL OIL WELL <input type="checkbox"/> GAS WELL <input type="checkbox"/> OTHER _____			7. UNIT or CA AGREEMENT NAME:
2. NAME OF OPERATOR:			8. WELL NAME and NUMBER:
3. ADDRESS OF OPERATOR: CITY _____ STATE _____ ZIP _____		PHONE NUMBER:	10. FIELD AND POOL, OR WILDCAT:
4. LOCATION OF WELL FOOTAGES AT SURFACE: _____			COUNTY: _____
QTR/QTR, SECTION, TOWNSHIP, RANGE, MERIDIAN: _____			STATE: UTAH

11. CHECK APPROPRIATE BOXES TO INDICATE NATURE OF NOTICE, REPORT, OR OTHER DATA

TYPE OF SUBMISSION	TYPE OF ACTION		
<input type="checkbox"/> NOTICE OF INTENT (Submit in Duplicate) Approximate date work will start: _____	<input type="checkbox"/> ACIDIZE	<input type="checkbox"/> DEEPEN	<input type="checkbox"/> REPERFORATE CURRENT FORMATION
	<input type="checkbox"/> ALTER CASING	<input type="checkbox"/> FRACTURE TREAT	<input type="checkbox"/> SIDETRACK TO REPAIR WELL
<input type="checkbox"/> SUBSEQUENT REPORT (Submit Original Form Only) Date of work completion: _____	<input type="checkbox"/> CASING REPAIR	<input type="checkbox"/> NEW CONSTRUCTION	<input type="checkbox"/> TEMPORARILY ABANDON
	<input type="checkbox"/> CHANGE TO PREVIOUS PLANS	<input type="checkbox"/> OPERATOR CHANGE	<input type="checkbox"/> TUBING REPAIR
	<input type="checkbox"/> CHANGE TUBING	<input type="checkbox"/> PLUG AND ABANDON	<input type="checkbox"/> VENT OR FLARE
	<input type="checkbox"/> CHANGE WELL NAME	<input type="checkbox"/> PLUG BACK	<input type="checkbox"/> WATER DISPOSAL
	<input type="checkbox"/> CHANGE WELL STATUS	<input type="checkbox"/> PRODUCTION (START/RESUME)	<input type="checkbox"/> WATER SHUT-OFF
	<input type="checkbox"/> COMMINGLE PRODUCING FORMATIONS	<input type="checkbox"/> RECLAMATION OF WELL SITE	<input type="checkbox"/> OTHER: _____
	<input type="checkbox"/> CONVERT WELL TYPE	<input type="checkbox"/> RECOMPLETE - DIFFERENT FORMATION	

12. DESCRIBE PROPOSED OR COMPLETED OPERATIONS. Clearly show all pertinent details including dates, depths, volumes, etc.

NAME (PLEASE PRINT) _____ TITLE _____

SIGNATURE _____ DATE _____

(This space for State use only)

INSTRUCTIONS

This form shall be submitted by the operator to show the intention and/or completion of the following:

- miscellaneous work projects and actions for which other specific report forms do not exist;
- all other work and events as identified in section 11, Type of Action, or as required by the Utah Oil and Gas Conservation General Rules, including:
 - minor deepening of an existing well bore,
 - plugging back a well,
 - recompleting to a different producing formation within an existing well bore (intent only),
 - reperforating the current producing formation,
 - drilling a sidetrack to repair a well,
 - reporting monthly the status of each drilling well.

This form is not to be used for proposals to

- drill new wells,
- reenter previously plugged and abandoned wells,
- significantly deepen existing wells below their current bottom-hole depth,
- drill horizontal laterals from an existing well bore,
- drill hydrocarbon exploratory holes such as core samples and stratigraphic tests.

Use Form 3, Application for Permit to Drill (APD) for such proposals.

NOTICE OF INTENT - A notice of intention to do work on a well or to change plans previously approved shall be submitted in duplicate and must be received and approved by the division before the work is commenced. The operator is responsible for receipt of the notice by the division in ample time for proper consideration and action. In cases of emergency, the operator may obtain verbal approval to commence work. Within five days after receiving verbal approval, the operator shall submit a Sundry Notice describing the work and acknowledging the verbal approval.

SUBSEQUENT REPORT - A subsequent report shall be submitted to the division within 30 days of the completion of the outlined work. Specific details of the work performed should be provided, including dates, well depths, placement of plugs, etc.

WELL ABANDONMENT - Proposals to abandon a well and subsequent reports of abandonment should include reasons for the abandonment; data on any former or present productive zones, or other zones with present significant fluid contents not sealed off by cement or otherwise; depths (top and bottom) and method of placement of cement plugs; mud or other material placed below, between and above plugs; amount, size, and method of parting of any casing, liner, or tubing pulled and the depth to top of any left in the hole; method of closing top of well; and date well site conditioned for final inspection looking to approval of the abandonment.

In addition to any Sundry Notice forms submitted, **Form 8, Well Completion or Recompletion Report and Log** must be submitted to the division to report the results of the following operations:

- completing or plugging a new well,
- reentering a previously plugged and abandoned well,
- significantly deepening an existing well bore below the current bottom-hole depth,
- drilling horizontal laterals from an existing well bore,
- drilling hydrocarbon exploratory holes such as core samples and stratigraphic tests,
- recompleting to a different producing formation.

Send to:

Utah Division of Oil, Gas and Mining
West North Temple, Suite 1210
Box 145801
Salt Lake City, Utah 84114-5801

Phone: 801-538-5340 1594

Fax: 801-359-3940

State of Utah
Department of Natural Resources
Division of Oil, Gas and Mining
Class VI EPA Primacy Application

XI. Attorney General's Statement



State of Utah
Department of Natural Resources
Division of Oil, Gas and Mining
Class VI EPA Primacy Application



XII. Memorandum of Agreement Addendum 1

MEMORANDUM OF AGREEMENT ADDENDUM 3

Between

The State of Utah And

**The United States Environmental Protection Agency Region 8 For the
Class VI UIC Program**

State of Utah
Department of Natural Resources
Division of Oil, Gas and Mining
Class VI EPA Primacy Application
XIII. Notice of Intent



NOTICE OF INTENT

**Department of Natural Resources
Division of Oil, Gas and Mining**

State of Utah
Department of Natural Resources
Division of Oil, Gas and Mining
Class VI EPA Primacy Application



XIV. R644 Natural Resources: Oil, Gas and Mining: Carbon Sequestration

R644. Natural Resources: Oil, Gas and Mining: Carbon Sequestration.

State of Utah
Department of Natural Resources
Division of Oil, Gas and Mining
Class VI EPA Primacy Application
XV. Public Comments



State of Utah
Department of Natural Resources
Division of Oil, Gas and Mining
Class VI EPA Primacy Application
XVI. Summary of Public Comments



State of Utah
Department of Natural Resources
Division of Oil, Gas and Mining
Class VI EPA Primacy Application

XVII. Class VI Rule Promulgation – Public Comments and Agency Response



State of Utah

Department of Natural Resources

Division of Oil, Gas and Mining

Class VI EPA Primacy Application

XVIII. Crosswalk for UIC Regulations

Crosswalk for Utah UIC Regulations Submitted with Primacy Applications Under Section 1425 of the SDWA

State of Utah
Department of Natural Resources
Division of Oil, Gas and Mining
Class VI EPA Primacy Application

XIX. Public Comments on Primacy Application

