

# Class VI Primacy in Louisiana: Expectations and Realities

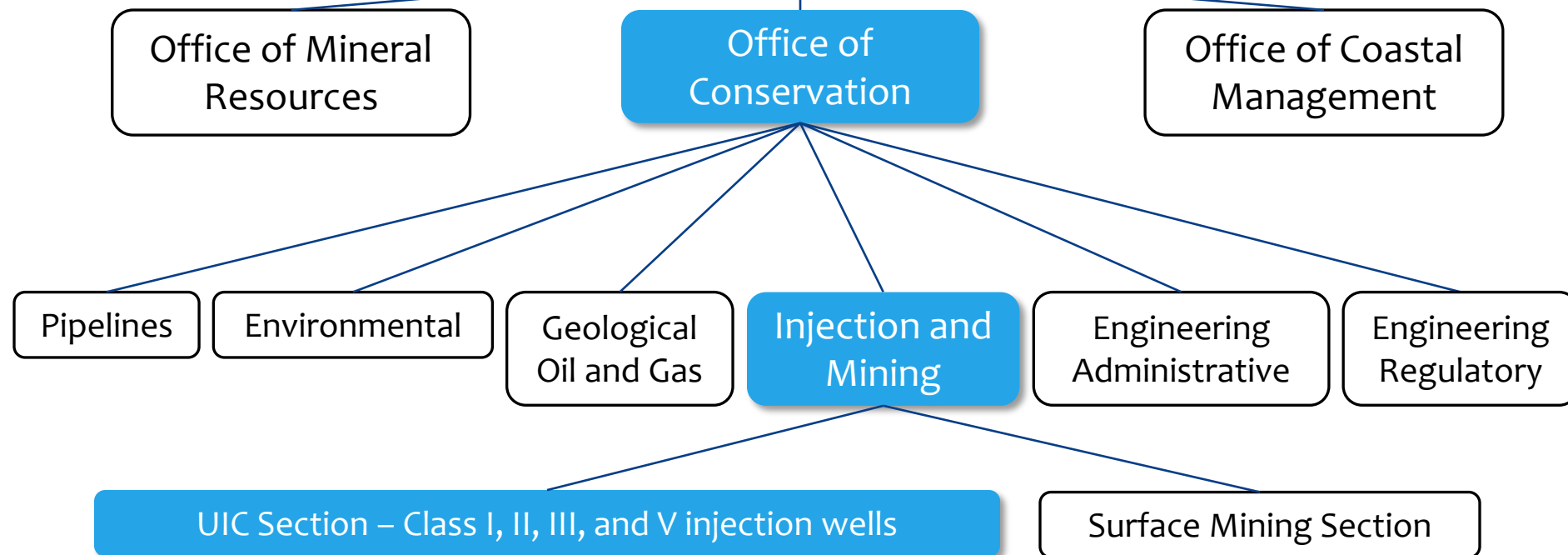


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Louisiana Department of Natural Resources  
Office of Conservation – Injection & Mining Division

**GWPC Annual Forum**  
**September 14, 2023**

# Louisiana Department of Natural Resources



# Class VI Primacy Process – Expectations

Protect the USDWs and the health and welfare of the citizens of Louisiana

Draft and submit an approvable Class VI primacy application

Build a Class VI program that will actually work

Find a way to pay for all of it

# Class VI Primacy Process – Realities

- \* **Public Perception**
  - \* **Environmental Justice Requirements**
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- \* **Programmatic Funding**
  - \* **EPA Timing and Responsiveness**

# Class VI Primacy Process – Realities

- \* **Public Perception**

- \* Stakeholder response to Class V stratigraphic test wells
- \* Legislative response
- \* Experience with public hearing for *Federal Register* notice and public comment periods

- \* **Environmental Justice Requirements**

- \* Stakeholder view on what EJ should entail vs. the limits of LDNR's statutory authority
- \* Requirements for environmental analysis based on IT Analysis/SOS Questions

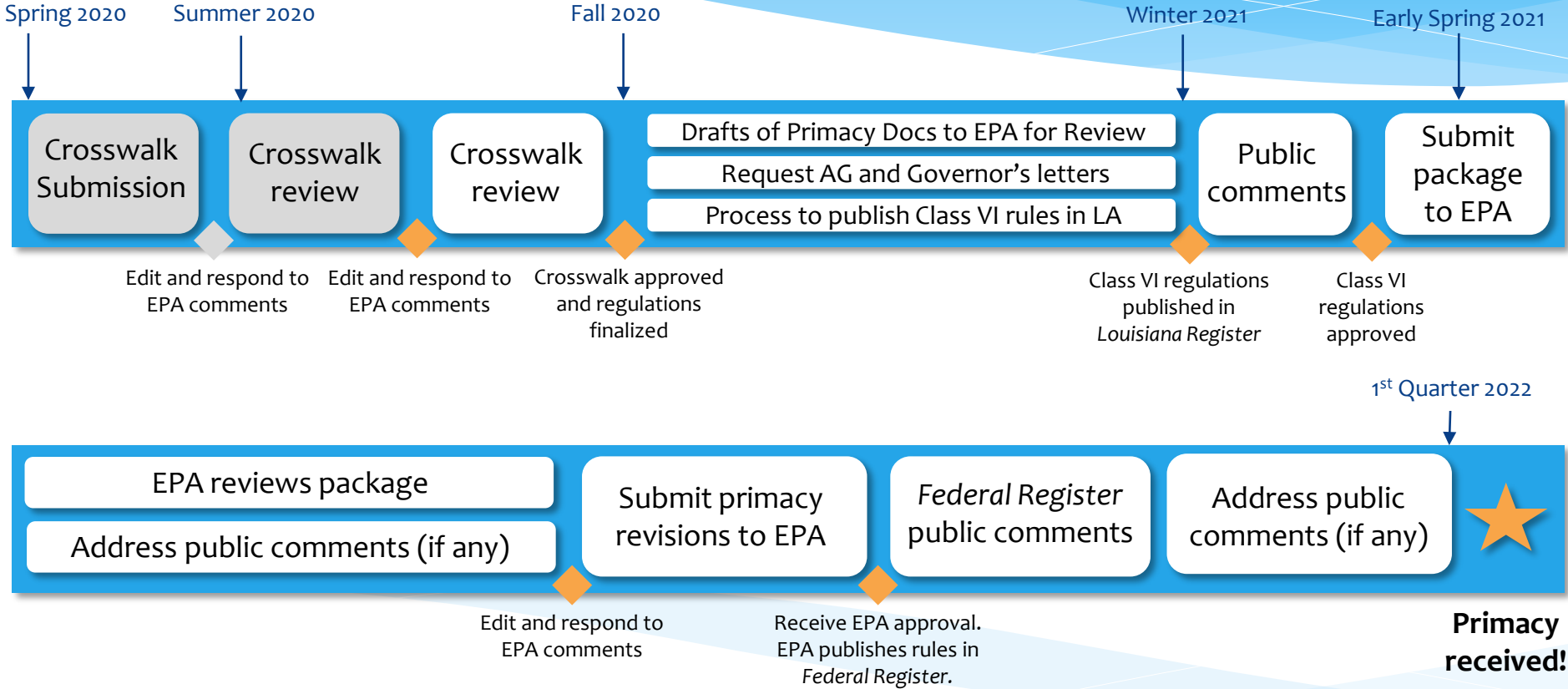
# Class VI Primacy Process – Realities

- \* **Programmatic Funding**

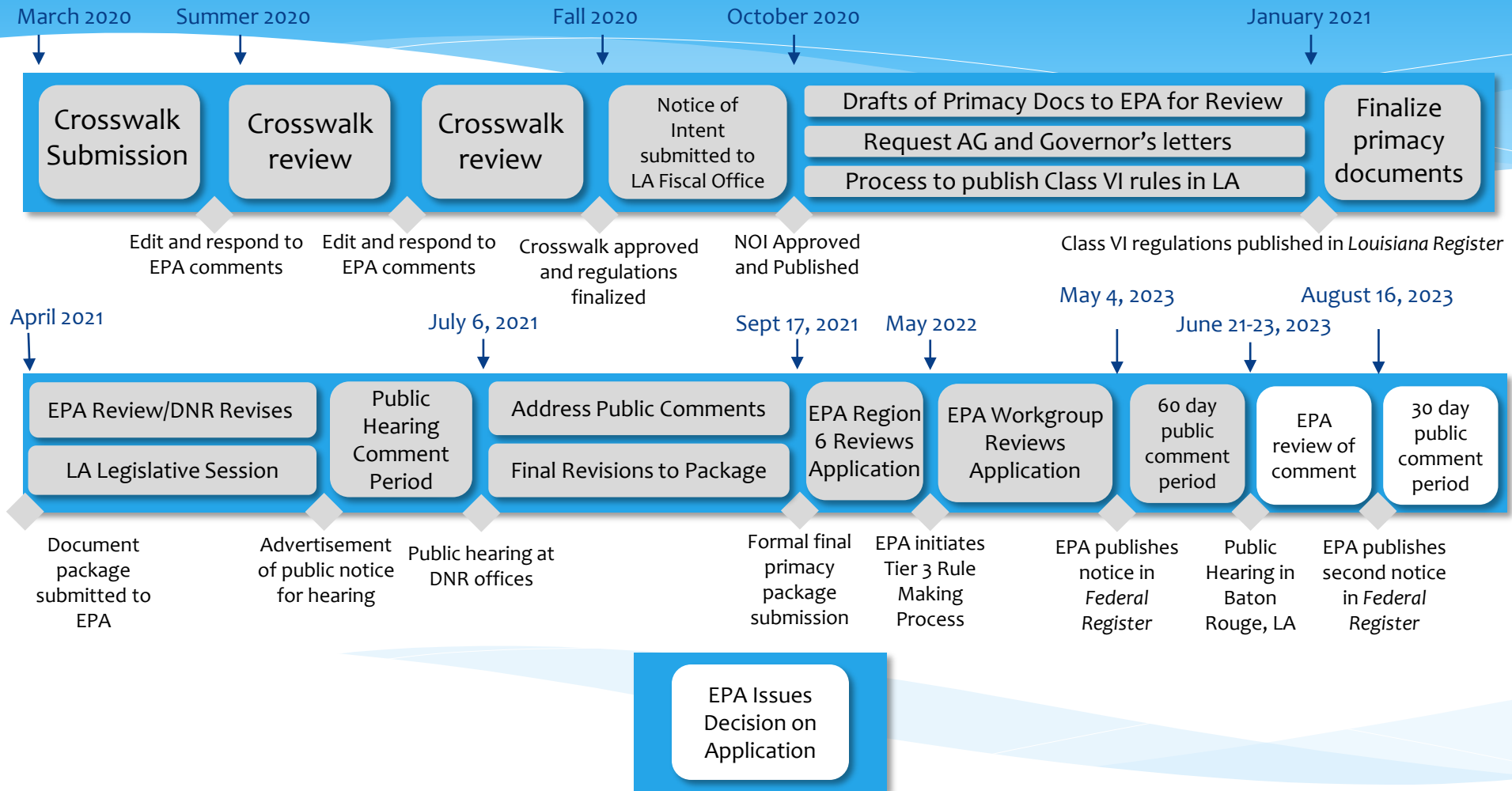
- \* State General Fund and Carbon Dioxide Geologic Storage Trust Fund (GSTF)
- \* LDNR cannot begin collecting fees from operators until primacy is awarded
- \* Initial cost estimates in 2020 assumed that primacy would begin FY22 and that it would take approximately two years for revenue to be high enough that the program wouldn't be dependent on State General Fund
- \* Additional information on amount and timing of Class VI BIL funding is vital to ensure that key program costs are accounted for in this gap
  - \* Permit writers, field inspectors, field vehicles, computer hardware, modeling software, data management
- \* Difficult to estimate costs incurred during application process

- \* **EPA Timing and Responsiveness**

# Primacy Timeline – September 2020



# Primacy Timeline – September 2023





# Questions?

## CONTACT INFORMATION

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