CARBON CAPTURE COALITION

Class VI Work Group
Inaugural Meeting Notes
Thursday, October 23, 2025

Meeting Summary

The Carbon Capture Coalition's Class VI Work Group convened its inaugural meeting on October 23, 2025, to launch member discussions on improving the Class VI regulations governing the saline geologic storage of carbon dioxide. The meeting brought together members from across industry, labor, and the policy community to review the current regulatory framework, share recent policy developments at the state and federal levels, and outline intended goals for the group's work. Participants emphasized the need for timely and consistent permitting reviews, adequate EPA staffing, and a balanced approach to federal and state roles in ensuring safe and efficient project development.

Key Takeaways

- Coalition staff highlighted recent developments, including Louisiana's Class VI moratorium, new EPA Class VI well approvals in Texas, and ongoing federal CCUS task force activities, which are expected to culminate in a report in early 2026.
- The Work Group will develop consensus recommendations for improving the Class VI permitting program through both a regulatory and legislative lens, mirroring the Coalition's 2023 permitting principles process.
- Members discussed the importance of an 18-month target timeline for permit reviews, noting EPA's current 24-month process could be streamlined with greater resources and staffing.
- The meeting included an EPA regulatory overview covering the technical, safety, and MRV requirements of Class VI wells under the Safe Drinking Water Act.
- Members highlighted the need for greater flexibility in permitting frameworks to accommodate diverse storage site types, including depleted gas fields, and to clarify federal versus state roles in emergency response and oversight.
- The group's anticipated final product will focus on regulatory improvements, complemented by legislative recommendations (if applicable), and other elements identified by the group's anticipated months-long discussions.
- **Given the diverse stakeholders in the Coalition, Coalition staff tempered expectations on the level of detail that the final document will be able to include.** It's worth noting that a prior product, the Coalition's permitting principles, while high-level, have allowed Coalition to substantively engage with policymakers and regulators and move forward the legislative agenda. **We welcome an open and robust discussion around all potential topics, but the outcome will ultimately be shaped by the consensus of the work group.**

Next Steps

- Complete the Class VI Priorities Survey:
    - Members are asked to share their organization's priorities to help shape the group's initial outline and discussion topics.

    - Coalition staff will compile survey responses (anonymized) and begin drafting an initial outline for the Work Group's regulatory and legislative focus areas.
- Next Work Group Meeting:
    - Scheduled for Tuesday, December 2 from 3–4 p.m. ET.

Meeting Links

- Coalition Class VI Priorities Survey
- Louisiana Class VI tracker
- Meeting Slide Deck

Meeting Notes

- Housekeeping
    - Coalition launching our 501c4 initiative, Carbon Capture Impact, in 2026!
        - Townhall on Tuesday, October 28, 2pm EST
        - Will talk through the new 501c4 and how it relates to the 501c3, how it will be funded by the new dues model and the new Advisory Council
- Intel sharing on Class VI
    - In October, Gov Jeff Landry in Louisiana announced a temporary pause on Class VI well approvals
        - Our understanding is that this is part of the overall effort to prioritize community engagement and near-term project reviews
        - LA has identified 6 priority projects and established a Class VI tracker similar to EPA's
    - A local community organization released a statement saying this executive order doesn't go far enough
    - EPA just approved two new Class VI wells in Texas
    - CCUS task forces on federal and non-federal lands are moving forward with their duties, and will likely publish reports and recommendations of in Q1 or Q2 of next year
        - Those recommendations will be relevant to the work we do with this WG
- Historical CCC Engagement on Class VI
    - Coalition has consistently advocated for robust annual funding, including for regulator training and resources through both base annual appropriations and the SCALE Act, which was ultimately included in the Infrastructure Investment and Jobs Act (IIJA)
    - Coalition's report language request has focused on strengthening EPA's ability to review and make determinations on applications in a timely manner, which is consistent with Coalition permitting principles released in 2023, as well as included in the Federal Policy Blueprint released in 2023 and 2025
        - Coalition urged EPA to review and make determinations on applications within 18-months of being deemed 'administratively complete'
        - EPA's current stated timeline is 24 months (which they are not meeting), which we believe can be shortened through streamlining process and staffing increases
    - Coalition submitted a Statement for the Record (SFR) to the Senate EPW in Spring 2025 on improving permitting practices, as well as to several other

committees in recent years, with specific emphasis on ensuring the Class VI program is efficient and effective
    - In August of 2025, Coalition staff met with the EPA Office of Water to discuss Coalition priorities regarding Class VI wells; the Office of Water political noted that Class VI is a priority for EPA Administrator Zeldin
        - The meeting was fruitful and timely, as we heard that EPA is looking to update the Class VI regulator review and application processes
        - EPA urged industry applicants to submit applications that are fully complete and good quality, rather than just getting into the queue of applications as quickly as possible
        - The Agency is prioritizing review of fully complete and quality applications over those that are simply submitted
    - In 2023, Coalition released a permitting principles document through a lengthy member-driven process; staff see possibilities for a similar effort with this group
- Work Group Level Setting
    - Aim
        - Forge consensus on improvements to Class VI through two lenses:
            - Regulatory
            - Legislative recommendations (if applicable)
    - Cadence
        - Monthly meetings; more often if necessary
    - Co-Chair Introductions
        - Ben Grove, Deputy Director, Carbon Management, CATF
        - William Swetra, Senior Policy Analyst, Oxy
    - Anticipated Final Products:
        - Regulatory improvements to the Class VI program:
            - Drafting process will mirror CCC's guiding principles for permitting reform in 2023
            - Final product can be shared with regulators, policymakers, etc.
                - Our intention is to form a consensus on regulatory and legislative priorities to strengthen the program; we believe this will ultimately take shape in the form of a recommendations document
        - From a legislative perspective, we have mainly engaged on Class VI wells from an appropriations angle:
            - It remains unclear how much further we can go as a Coalition from a legislative perspective on Class VI beyond potentially directing EPA to revisit Class VI regulations
            - It is not our intent necessarily to create legislative proposals, but to think through whether there is a legislative pathway to achieve priorities born from discussion amongst this group
            - We believe this group will mainly focus on the regulatory piece of the puzzle, but any legislative angle would be additive
            - Any recommendations that have a legislative thread will move through the Legislative Work Group for further action
    - Topics We Anticipate Covering Through the Work Group
        - Class VI regulations

                - Identifies areas where the regulations are inconsistent, duplicative, or too stringent with no material safety benefit
                - Since the regulations were initially finalized in 2010, there have not been updates to them; we hope to identify areas of material improvement without sacrificing the rigor and safety of the program
            - Responding to EPA's work to harmonize application review across regions
                - Individual application review
                - Primacy application reviews
                - Guidance to states
                    - There are inconsistencies across regions with each of these areas; operator experience with review varies region to region, which introduces risk to project development timelines
                    - Streamlining efforts across regions could be helpful in prioritizing effectiveness and efficiency
            - Priorities for EPA to ensure timely review
                - Staffing
                - Resources (funding)
                - Identifying opportunities to formalize interagency coordination (i.e. role of MOU with National Labs, etc.)
            - 18-month review timeline
                - EPA has already had trouble sticking to a 24-month review time, where technical review has been the longest and most complicated piece of the process
                - Need to address staffing and other needed resources at EPA for a tighter timeline to work
- Presentation on the current regulatory regime for Class VI injection wells
    - Information presented directly from EPA regulations
    - The Safe Drinking Water Act requires permits with protection and mitigation measures for the Geologic Sequestration (GS) of CO_2
    - UIC Class VI regulations are designed to protect underground sources of drinking water (USDWs) by preventing the movement of CO_2 out of the injection formation
    - Protective aspects of UIC Class VI regulations include:
        - Multiple safeguards to protect USDWs (described later in this presentation)
        - Development of written plans for operating a GS project based on EPA technical guidance
        - Adaptable and evolving revisions are made to plans if new data indicate the need
        - Tracking the movement of the "plume" of CO_2 and any other potential changes in the subsurface
    - Goals: Protect USDWs by confirming that the site is suitable for GS – that it can hold the CO_2 and that CO_2 will not leak through geologic pathways

        - How this is done:
        - Testing, data collection, and analysis to show the following:
            - Injection Zone—can hold the injected CO_2. Thousands of feet deep
            - Confining Layer—prevents CO_2 from moving upward
            - Faults—if present, test to verify they are inactive and will not allow movement of CO_2
            - Seismic history—confirm seismic stability in the area
            - Compatibility—verify that there will be no unanticipated reactions between the CO_2 and the existing chemical composition in the injection zone
    - Class VI wells are constructed to protect USDWs
        - Goals: Protect USDWs by preventing injected CO_2 or other naturally occurring fluids in deep formations from reaching USDWs; isolate geologic formations from each other; ensure the well will tolerate the subsurface conditions it will encounter
        - How this is done:
            - To prevent fluids from entering USDWs, wells are constructed with multiple protective layers of casing and cement to ensure:
                - Injected CO_2 does not leak from injection wells
                - Deep formation fluids do not move along the outside of the well casing and migrate upwards
            - High-quality cementing is key to preventing fluid movement and protecting USDWs
            - Well materials are corrosion-resistant
            - Cement around the long metal tube ('long strong casing') must extend all the way from surface to the bottom of the well to isolate formations and prevent CO_2 movement between formations along the well
            - After construction and before injection, wells are tested to:
                - Verify structural soundness
                - Check cement quality
                - Check for leaks in tubing and casing
    - The Area of Review (AoR) defines the area surrounding a project where USDWs are to be protected
        - Goals: Identify the surface footprint of the subsurface area that could be influenced by CO_2 injection; take measures to protect USDWs in that area during and after injection
        - How this is done:
            - Computer modeling helps predict where the CO_2 is expected to spread and where pressure in the formation will increase
            - The AoR is checked for all existing wells, including old and abandoned wells that could be conduits for CO_2 leakage
            - Improperly abandoned wells may need remediation
            - AoR is used in planning, monitoring, and can be revised based on monitoring data during injection

        - Guided by a plan approved by the UIC Director
    - Safe operations protect against CO_2 leakage out of the injection formation
        - Goals: Avoid fracturing the injection formation or confining layer to ensure that injected CO_2 remains where intended and does not migrate to other formations, including USDWs
        - How this is done:
            - Testing to determine a safe maximum allowable injection pressure that includes a safety margin
            - Maximum Injection set pressure below the pressure that would fracture the injection formation or confining layer
            - Flow rate and injection pressure are continuously monitored at the wellhead during injection
    - Multiple types of testing and monitoring are done to support safe injection and storage of CO_2 during injection and through to site closure
        - Goals: Track CO_2 injection, CO_2 movement, and pressure; be alerted to leakage, problems with the injection well, or other unexpected changes in the subsurface
        - How this is done:
            - Pressure and CO_2 tracked in the injection formation
            - Groundwater quality monitored above the confining zone
            - Seismic surveys were done to image the location and size of the CO_2 plume
            - Physical integrity of the well is tested routinely
            - Testing for corrosion of the well is required
            - Records retained for 10 years after site closure
            - Guided by a plan approved by the UIC Director
        - EPA also recommends that for each of the things you need to monitor, you provide a description of the method you use to monitor, a scientific basis, a holistic description, a description of procedures, and other things
    - Emergency response plans are in place before injection begins
        - Goal: Respond quickly to any events that could pose a danger to a USDW
        - How this is done:
            - Approved emergency response plan
            - Quick identification of any potential dangers to USDWs, such as:
            - Evidence of CO_2 leakage
            - Noncompliance with permit conditions
            - Malfunction of the injection system
            - Well owners/operators are required to report any evidence of potential dangers to a USDW within 24 hours
            - Emergency notifications will be initiated by phone or email
            - Subsequent steps include:
                - Formulating an appropriate owner/operator response
                - Follow-up monitoring and testing
                - Authorization to resume injection
    - Project sites must pose no danger to USDWs in order to be closed

        - Goals: Demonstrate to the UIC Director that the project site will pose no danger to USDWs in the future; close and restore the project site
        - How this is done:
            - After injection ceases, monitoring continues according to the approved post-injection site care plan
            - Well is plugged according to the approved well plugging plan:
                - Long-term prevention of CO_2 moving into USDWs
                - Keeping formations isolated
            - To prepare to close the project site:
                - Demonstrate that the plume and pressure in the injection formation are stable
                - Site closure—remove surface equipment and restore site to condition approved by the UIC Director
    - Financial responsibility is demonstrated before a project is approved
        - Goal: Ensure that the private costs of GS – including possible costs after the well is plugged – are not passed along to the public
        - How this is done:
            - Part of the permitting process is a demonstration of financial responsibility
            - Well owners/operators must provide documentation to the UIC Director showing that they have established a financial instrument with a third-party or have self-insurance
    - Opportunities for public participation are an important part of the UIC regulatory framework
        - Goals: Project transparency, publicly available information, and opportunities for stakeholder input on concerns regarding risks to USDWs; develop a robust permit that addresses such concerns
        - How is this done?
            - Draft permits published for public viewing and comment period (at least 30 days)
            - The public can request a hearing in writing during the public comment period
            - Appeals
            - Individuals who have filed comments on a draft permit or have participated in a public hearing may file an appeal on a final permit with the Environmental Appeals Board
                - Individuals who did not participate in public comments or hearings can appeal changes between the draft and the final permit
- Proposed Coalition priorities
    - Near-Term (over next 3-4 months)
        - Provide comment to EPA Office of Water on ‘best practices’ for application submission and completeness review determinations
            - Have heard from several project developers that there are things they’d like to see, and would like to engage on in that conversation
        - Identify additional ways to bolster Class VI through legislation

            - This will likely primarily be through appropriations, should also look at state capacity needs/federal role there
    - Long-Term (over next 6+ months)
        - Build consensus recommendations on any needed regulatory changes
        - Anticipated final timeline of Spring/Summer 2026
- Next Steps
    - Please respond to the survey with your organizational priorities around Class VI
        - This will help us fill out our initial outline for Coalition work & discussion topics
        - Will work to anonymize information before sharing with co-chairs
        - Please submit this a week before our next Work Group meeting
    - Convene next Work Group
        - Tuesday, December 2, from 3-4 p.m. ET