

# Class VI Work Group

December 2, 2025



**CARBON CAPTURE  
COALITION**

# Agenda

## Welcome / Housekeeping

## Intel Sharing

- TX Primacy; EPA guidance on permit reviews

## WG First Meeting Recap

- Aim of Class VI WG
- Work Product Overview

## Topics for Consideration

- Opportunities for Engagement on Class VI Regulations
- EPA Regional Guidance
- Member Feedback from Survey

## Brainstorming Session

## Conclusion

# Housekeeping

- **Coalition Annual Meeting Follow Up**
- **2027 Federal Policy Blueprint**
  - Beginning drafting process early next year
- **Feedback on GHGRP Interim Guidance due by 12/05**



# Intel Sharing

- **Texas primacy over UIC Class VI wells**

- The Texas Railroad Commission made several comments, “primacy will streamline the application process and provide the regulatory certainty that is critical to Texas, which is one of the most productive energy regions in the world.”

- **EPA next steps**

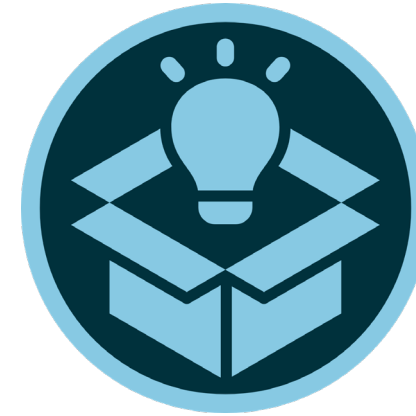


# Work Group Recap



## Aim

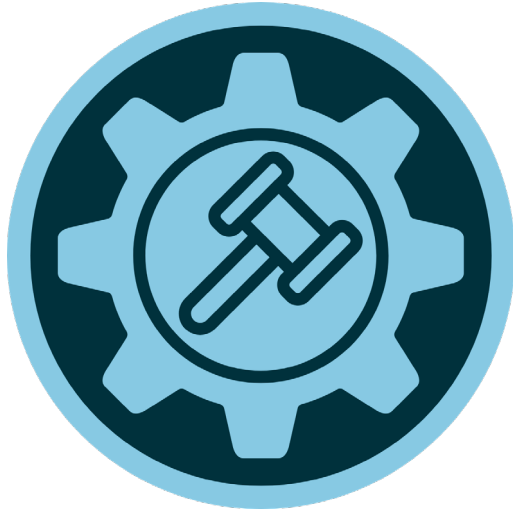
- Forge consensus on streamlined improvements to Class VI through two lenses:
  - Regulatory
  - Legislative



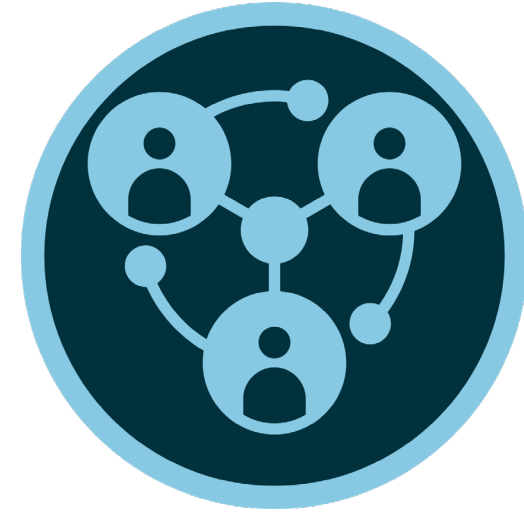
## Anticipated Work Group End-Product

- Potential comment letter to EPA Office of Water on opportunities to clarify/streamline application submission and harmonize regulator review practices across regions
- Guiding principles for streamlined improvements to Class VI; mirroring CCC's guiding principles for permitting reform, but more technical in nature

# Topics for Consideration



**Opportunities for regulatory reform of Class VI regulations**



**Opportunities for engagement with EPA**

# Class VI Regulatory Reform

**Timely Decisions on Applicability of Federal Laws**

**Area Permits**

**Risk-based Permit Modifications**

**Collection of Relevant Subsurface Data and Information**

**Financial Responsibility Alignment**

**Fit for Purpose Monitoring and Testing Requirements**

**Establish Baseline Emergency and Remedial Response Plan Requirements**

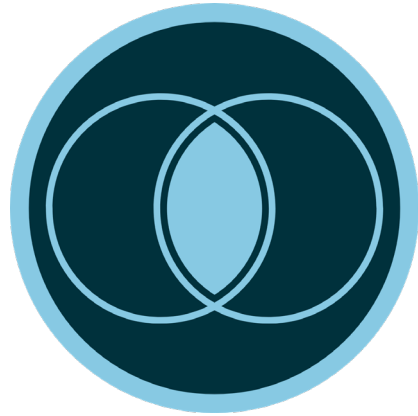
**Update UIC Class VI Guidance Documents**

# Opportunities for Engagement with EPA

- **Engagement opportunity:**
  - submit a letter to EPA on the need for consistency across regions
  - Any topics or themes this group would like to include?



# Member Responses from Survey



## Higher-Level Themes

- Aquifer exemptions
- Application review speed/engagement with EPA
- Major vs. minor permit modifications
- Speed of permitting
- Guidance and policy versus regulation change



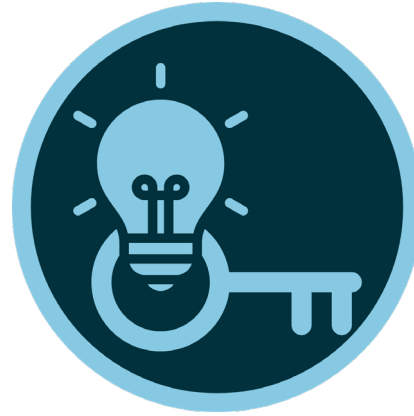
## Individual Recommendations

- Proceeding with permit reviews in Louisiana
- Financial assurance strength tests
- Flexibility on testing and monitoring
- Pressurization considerations with depleted wells

# Brainstorming



**What do we see as the primary issues requiring further group discussion?**



**What issues do we see having the biggest opportunities to advance?**



**What are concrete proposals versus framing thoughts for the guiding principles?**

# Thank You!

For any questions, please reach out to Coalition Staff.



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