





Railroad Commission of Texas The Geologic Advisory Unit

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Groundwater Protection DeterminationsUsing On-Line Forms GW-1 & GW-2















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- What do we Protect?
- Classic GW-2 Letters
- New Format GW-2 Letters
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 - Class V & VI
- Online filing for GW-1 letters

The GAU



Technical Permitting Department

- Underground Injection Control (UIC)
 - o Oil and Gas activities
- Special Injection Permits (SIP)
 - o Solution Mining, CCS, Hydrogen
- Environmental Permits and Support
 - o Tanks, Pits, Haulers
- Engineering Unit
 - Technical support and review
- Geologic Advisory Unit (GAU)
 - Groundwater Advisory, Location, Mapping
 - Geologic Investigative Unit
 - Severance Tax and Administrative Unit



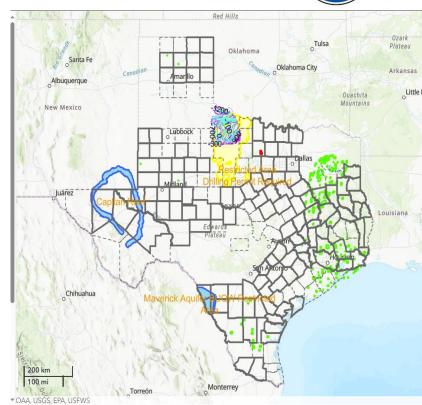


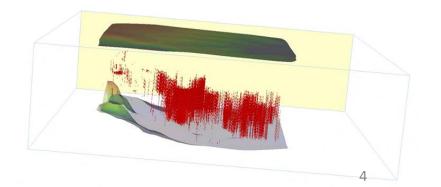
Internet Access to GAU Data and Analytics



Primary Data Sources:

- O&G Operator Provided Information (Help us to Help You)
- Government & NGO Web Resources, RRC, TWDB, TCEQ, BEG, GLO, USGS
- Legacy Cloth Maps, Micro Fiche, and Well Files
 - From 1950 thru 1970's created in real time
- Live access to the best available Commercial Geophysical libraries in the World
- Drilling Insight and Casing Estimator (DICE):
- University of Texas Bureau of Economic Geology https://www.beg.utexas.edu/sce





What Do We Protect?



Surface Casing:

- Texas Economic Code Rule 3.30(B)(i) ... base of usable-quality water (**BUQW**)
 - (generally, less than 3,000 mg/L total dissolved solids, but may include higher levels of total dissolved solids if identified as currently being used or identified by the Texas Water Development Board as a source of water for desalination...

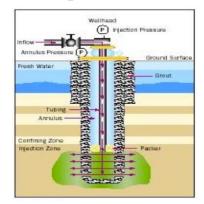
Plugging:

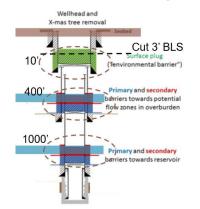
- EPA Secondary Drinking water standards are 500 TDS
- EPA considers 1,000 TDS "Safe" for drinking, you can survive on much higher for a time
- Texas State Water Code 27.002 (8) "Fresh water"
 - Means water having bacteriological, physical, and chemical properties which make it suitable and feasible for beneficial use for any lawful purpose

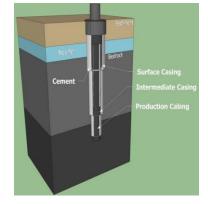
Underground Injection Control:

- 40 CFR Section 144.3 Underground Source of Drinking Water (USDW)
 - (a) supplies any public water system, or contains sufficient quantity of ground water to supply public water system and currently supplies drinking water for human consumption or contains fewer than 10,000 milligrams/liter of Total Dissolved Solids (TDS)
 - b. is not an exempted aquifer.



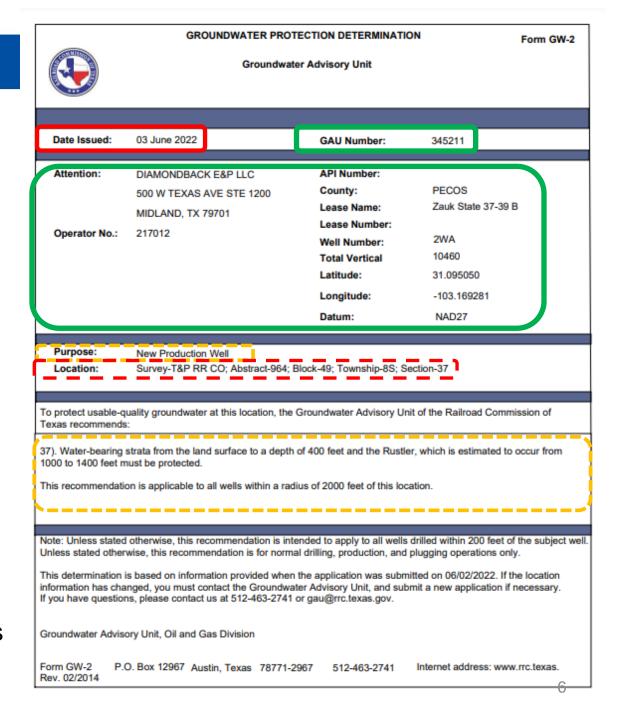






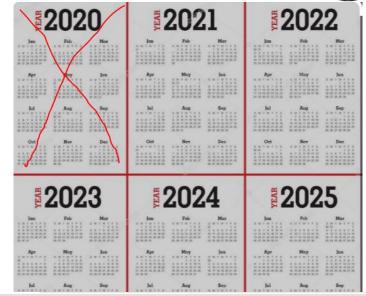
Classic Water Board Letters

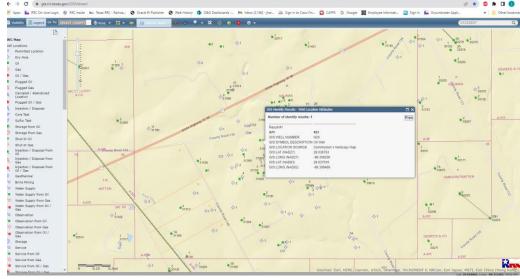
- Date Issued
 - Good for 5 years from this date
 - GAU Number (Primary Key)
- Demographics
 - Letters can be ordered by anyone
 - Valid Letters can be used by anyone else
- Purpose and Location
 - Letters can be used for multi purposes
 - Shallow, medium, deep
- Location
 - Letters are issued to a location
- Determination
 - Depths of tops & bottoms of water bearing zones



GW-2 (Water Board Letter) Useability

- Letters are only Valid for 5 Years
 - Information availability improves with time
- Issued for the location not the Requestor
 - Anyone can use any valid letter for any valid purpose
- The GAU letter will specify the location
 - Section/ Abstract/ Radius/ API Number
 - https://gis.rrc.texas.gov/GISViewer/
- Section-wide letters can be requested
 - Depends on the depth to BUQW
 - Complexity of hydrogeology
 - Wide Area H-15 Letters Discontinued since 2023





17 Reason's for Filing



- Some GAU letters are multi-purpose, others are specific to the purpose of filing
 - Multi-purpose: Unless otherwise specified the GAU letter may be used for any similar purpose
 - ✓ New Drill, Plug & Abandon, Recompletion, H-15 UQW Statements
 - Single Purpose: UIC Letters are specific to the well(s)
 - ✓ H-1 & W-14 include USDW & Confinement Statements
 - √ Class VI Carbon Sequestration Wells
 - Wide Area H-15 Letters Discontinued 2023
 - It will take 4 years for current H-15 letters to expire



This recommendation is applicable for all wells drilled in this section 2.

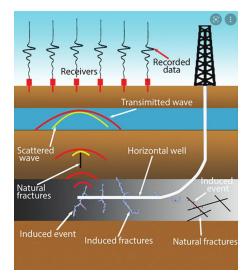
If a well fails H-15 testing and is going to be plugged or subjected to an activity requiring a current Groundwater

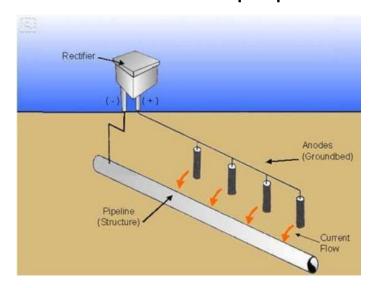
Determination Letter, then a new application must be submitted with the appropriate Reason for Filing to obtain all the groundwater protection isolation depths for the well.

Shallow Determinations [Single Purpose]



- [SWR 99] Cathodic Protection Wells
- [SWR 100] Seismic/Microseismic Wells
 - GW-1 Needed if Well is >30' (SWR 99 & SWR 100)
 - W-1 (Permit) Needed if CP/MS well penetrates protection depth
 - Submit well schematic of CP/MS well with W-1
 - GW-2 for CP/MS wells cannot be used for other purposes





Medium Depth Letters [Multipurpose]



- SWR 13: New Drills
 - Re-entry, Recompletion
- SWR 14: Plugging
- SWR 15: H-15
- SWR 13: O&G Water Supply
- SWR 13: P-13 Conversion to Water Well



New Drill [Multipurpose]



Surface Casing and Cementing

 SWR 13: Set and cement surface casing protect usable quality water strata (BUQW)

Casing shoe set at or 200' below BUQW

Identify all unique water bearing formations

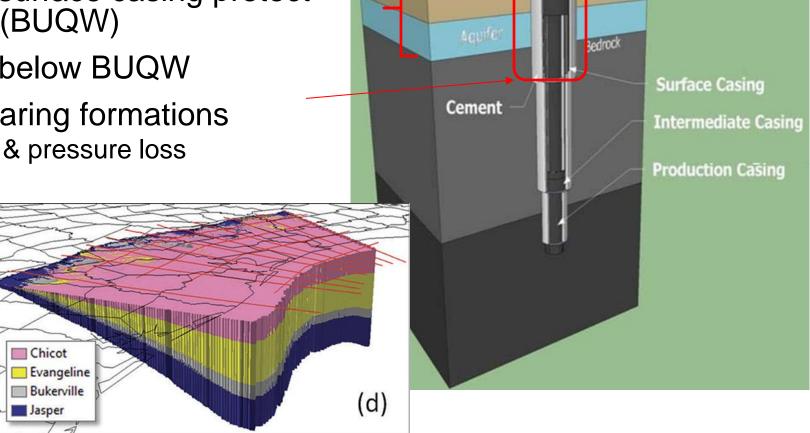
✓ Prevent underground mixing & pressure loss

Gulf Coast Example:

4 Gulf Coast Aquifers

4 Protection Depths

Variable protection depths



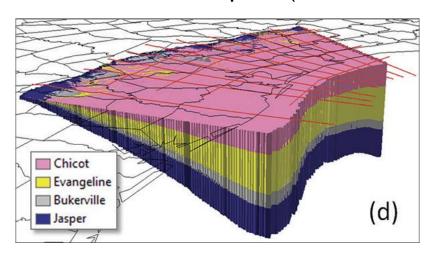
Well Plugging [Multipurpose]

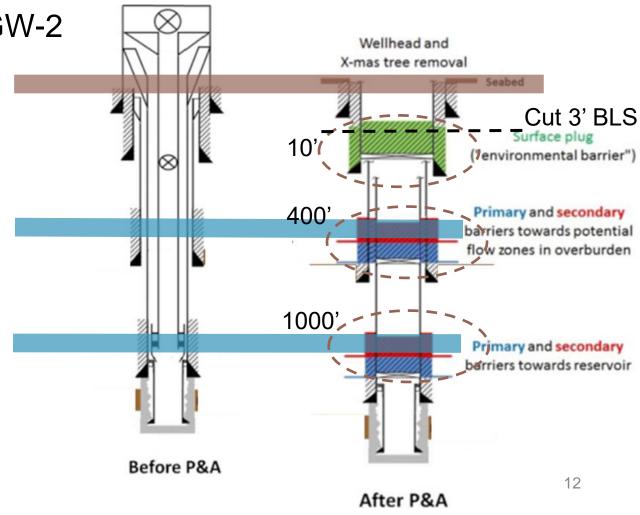


- SWR 14: Requires plugs to isolate Base of Usable Water Strata
- Separate all Usable Water Strata as determined by the GAU
 - Multiple zones may be identified on GW-2
 - 100' Plugs centered at GW-2 depths
 - Effects areal extent given

Example:

- 4 Gulf Coast Aquifers
- 4 Protection Depths (1 to 1 relationship)





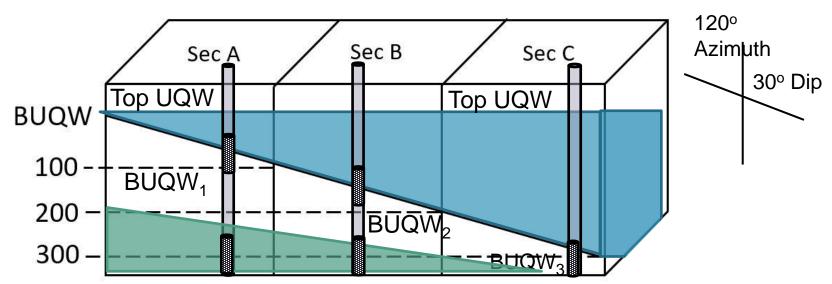
Areal Extents



- The areal extent given depends on change of elevation to protection depth(s) (BUQW)
 - Surface Elevation
 - Stratigraphic Dip
- SWR 14 requires 100' plugs centered on Protection Depths

The areal extend is limited to a BUQW change of 50-100 ft over the area

requested



UIC Purpose of Filing H-1 & W-14 [Single Purpose]



- Additional info is required for UIC Wells
 - Must attach Form H-1/H-1A or W-14 (injection interval)
 - Representative well log required for W-14
- Base of USDW Statement Included (<10K TDS)
 - No injection allowed into Underground Sources of Drinking Water (USDW)*
 - Identify USDW (10 K TDS) in addition to USDW
- GW-2's include Geologic Isolation Statements
- GW-2 Includes "No Endangerment" language
 - W-14's and some H-1's receive "X Endanger"

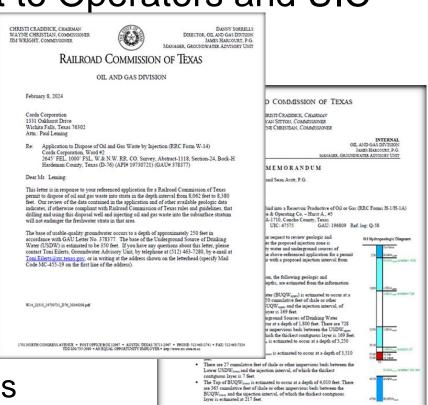
UIC Purpose of Filing H-1 & W-14 Continued



Past UIC Reviews included Documents sent to Operators and UIC

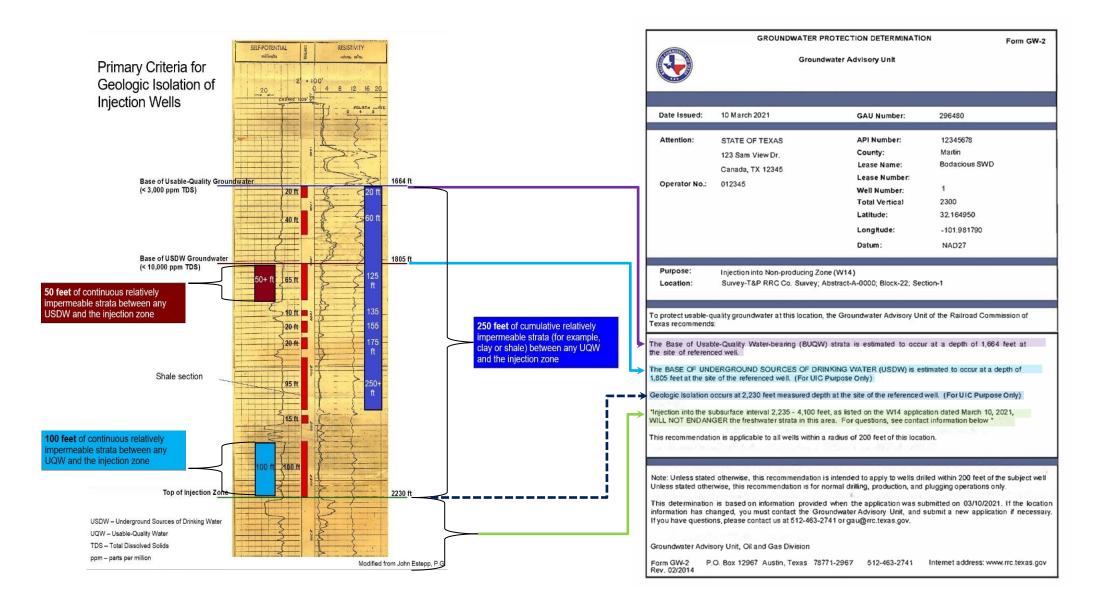
the Department

- This information now included in GW-2's
- Special Injection Permits Unit (SIP)
 - Class V Geothermal
 - Class VI Carbon Sequestration
 - Maintain an Underground
 - Hydrocarbon Storage
 - Mining of Produced Water
 - Lithium, Magnesium, Zinc, Platinum group metals
 - Form H-2 Create, Operate, Maintain a Brine Mining Facility
 - Form H-4 Application to Create, Operate and Maintain an Underground Hydrocarbon Storage Facility



New Combined GW-2 Format for Injection Well & Geologic Isolation





New Combined Format UIC & Geologic Isolation Continued



- Applies to all Wells
- For UIC Wells Only
- Statutory UIC Statement
 - Technical Permitting
 - Field Ops
 - Operators

Purpose: Injection into Non-producing Zone (W14)
Location: Survey-T&P RRC Co. Survey; Abstract-A-0000; Block-22; Section-1

To protect usable-quality groundwater at this location, the Groundwater Advisory Unit of the Railroad Commission of Texas recommends:

The Base of Usable-Quality Water-bearing (BUQW) strata is estimated to occur at a depth of 1,664 feet at the site of referenced well.

The BASE OF UNDERGROUND SOURCES OF DRINKING WATER (USDW) is estimated to occur at a depth of 1,805 feet at the site of the referenced well. (For UIC Purpose Only)

Geologic Isolation occurs at 2,230 feet measured depth at the site of the referenced well. (For UIC Purpose Only)

'Injection into the subsurface interval 2,235 - 4,100 feet, as listed on the W14 application dated March 10, 2021, WILL NOT ENDANGER the freshwater strata in this area. For questions, see contact information below '

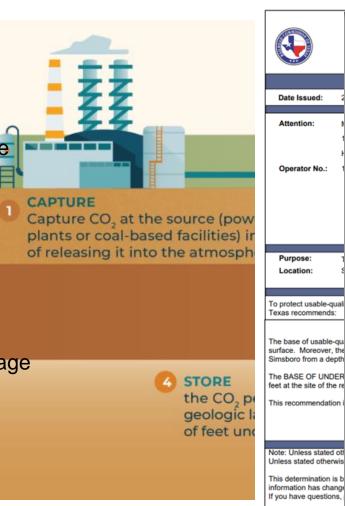
This recommendation is applicable to all wells within a radius of 200 feet of this location.

Class VI GW-2 Letter Workaround [Single Purpose]

rease

in

- Class VI Carbon Sequestration
 - Capture of Industrial CO2
 - o Permanent CO2 Storage
 - Climate Change Driven
 - o 45Q Tax Credit
- Class VI Purpose for Filing Unavailable
 - Use Purpose Test Well for New Drills
 - o Use Purpose W-14 for final letter
 - Attach CSS Data Sheet
- GW-2 Includes BUQW and USDW
 - No Isolation Statement
- New Letters will be issued for each Stage
 - Characterization
 - Injection Test
 - Operation
 - o Expansion/Monitor
 - Close Out





	GROUNDWATER PROTECTION DETERMINATION Groundwater Advisory Unit				Form GW-2
Date Issued: 2					
	Date Issued:	22 April 2024	GAU Number:	381431	
Attention: N 1 P Operator No.: 1	Attention: Operator No.:	MILESTONE CARBON, LLC 840 GESSNER ROAD SUITE HOUSTON, TX 77024 100805	API Number: County: Lease Name: Lease Number: Well Number: Total Vertical Latitude: Longitude: Datum:	LOVING Loving AGI 2 22780 31.884337 -103.695788 NAD27	
Purpose:	Downson				
Location: §	Purpose:	Injection into Non-producing Zone (W-14) Survey-T&P RR CO; Abstract-65; Block-54; Township-1; Section-43			
	Location:				

Texas recommends:

To protect usable-quality groundwater at this location, the Groundwater Advisory Unit of the Railroad Commission of

Water-bearing strata from the land surface to a depth of 725 feet and the Rustler, which is estimated to occur from 1,000 to 1.425 feet must be protected.

The BASE OF UNDERGROUND SOURCES OF DRINKING WATER (USDW) is estimated to occur at a depth of 1,475 feet at the site of the referenced well

*The vertical geological isolation from both bases of usable quality water and underground source of drinking water is a 1.800 feet in TVD depth *

Injection of oil & gas wells' waste (CO2 & H2S) into the subsurface interval from 18,387 to 22,780 feet in TVD depth, a proposed in the submitted W14 Form application dated on April 19, 2024, WILL NOT ENDANGER the PROTECTED WATER STRATA at the proposed location in this area. For questions, see contact information below.

Note: Unless stated otherwise, this recommendation is intended to apply to all wells drilled within 200 feet of the subject well.

Unless stated otherwise, this recommendation is for normal drilling, production, and plugging operations only.

This determination is based on information provided when the application was submitted on 04/19/2024. If the location information has changed, you must contact the Groundwater Advisory Unit, and submit a new application if necessary. If you have questions, please contact us at 512-463-2741 or gau@rrc.texas.gov.

Groundwater Advisory Unit, Oil and Gas Division

Form GW-2 Rev. 02/2014

Form GW 2 D C Roy 12967 Austin Toyon 79774 2007 E42 462 2744 Internet address: MANUTE to

North-Central Texas GAU Letter (1 of 2)



- Set BUQW for the North-Central Texas Area Groundwater Protection Determination
- Download GAU letter from GAU website
- Does not apply for injection wells. Need to submit GW-1

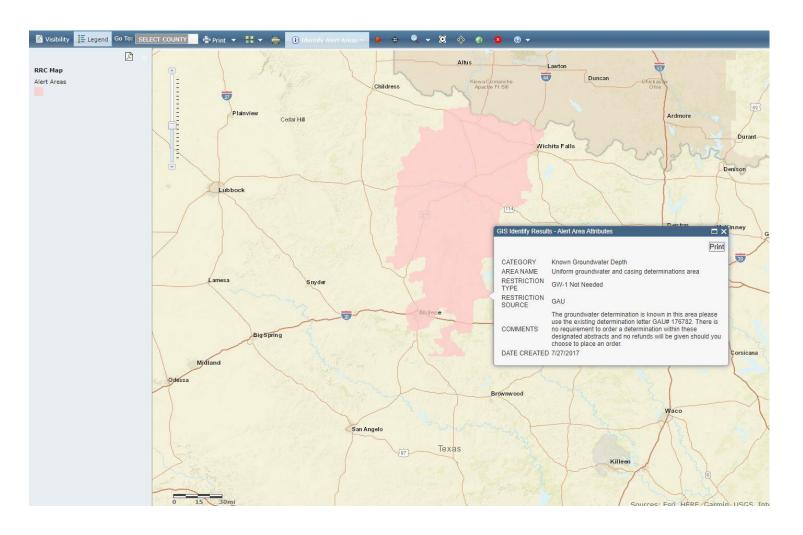




North-Central Texas GAU Letter (2 of 2)



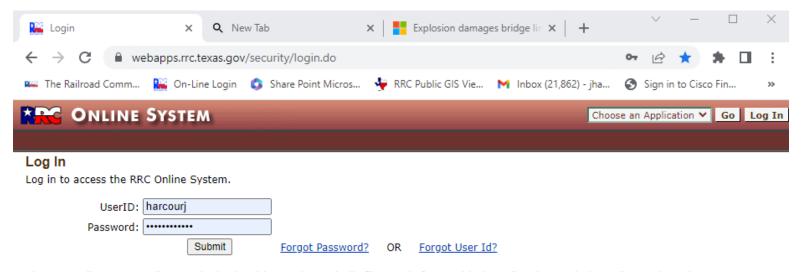
- North-Central Texas Area Groundwater Protection Determination
- Determination info also on RRC Public GIS Viewer



On-Line Login



https://webapps.rrc.state.tx.us/security/login.do



The RRC Online System allows authorized entities to electronically file certain forms with the Railroad Commission online or through EDI. Forms processed through this system are ones containing data that has been migrated from the Commission's mainframe to an open system environment. Through the RRC Online System, forms can be filed online over the Internet using a web browser, or data files can be uploaded through the application.

How to Obtain a User ID:

To utilize the Online Filing system, you must have a User ID that is assigned to you by your company's designated Security Administrator. A company or individual may designate a Security Administrator by completing the Security Administrator Designation (SAD) form and mailing it to the RRC. When the SAD form is processed, the Security Administrator will receive a User ID and a temporary initial password. The Security Administrator will be able to log into the RRC Online System using their assigned User ID and create User IDs for users within their company. They will also be able to assign certain electronic filing rights for those accounts, and perform account maintenance activities (such as resetting passwords) when needed.

If you are uncertain whether your company has a security administrator, please email the Commission at rrconline-security@rrc.texas.gov.

- 1. Read the requirements for participating in online filing.
- Print the SAD form.
- Complete and sign the form then mail it to the RRC, following instructions on Page 2 of the form. When the form is processed, the designated security administrator will receive a User ID and temporary password by email.
- 4. The security administrator will log into the system and assign User IDs and filing rights.

GW-1 Administrative Filing



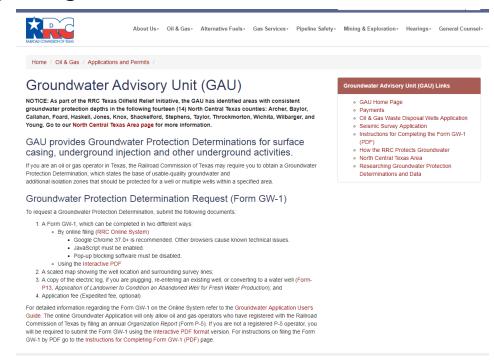
- Groundwater Determinations can be ordered two ways
 - Use the RRC On-Line System
 - Download a PDF form on the GAU Website
 - Email the completed GW-1 form to gau@rrc.texas.gov
 - Send the completed GW-1 form through regular mail



Welcome to the RRC Online System

Main Application

- Account Administration
- Drilling Permits (W-1)
- Completions
- Groundwater (GW-1)
- Digital Well Log Submission



Menu and User Guide



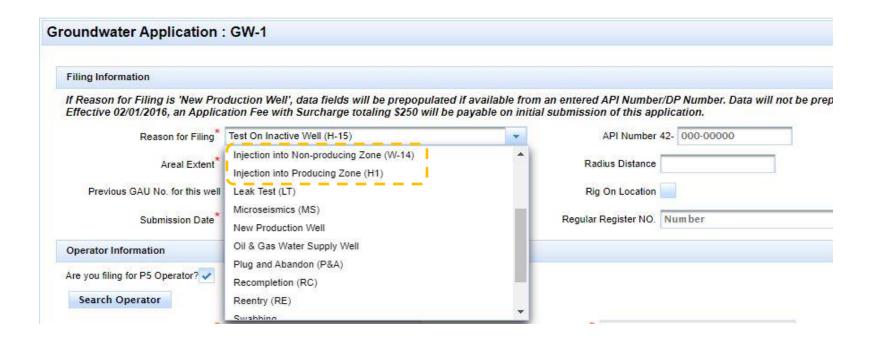
- My Applications (Status)
 - Check application status
 - "Draft" means not submitted
- Search for previous filings
- New Application
- User Guide



Reason for Filing: H-1 or W-14



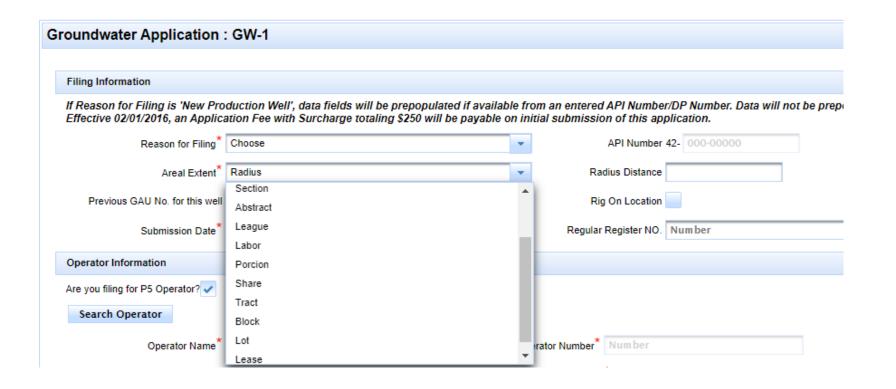
- GAU letters for UIC must have correct purpose of filing
 - H-1 and W-14 letters are different evaluations
 - Attach Form H-1A or W-14
 - Log required for H-1 and W-14



Reason for Filing: Areal Extent or Well Specific



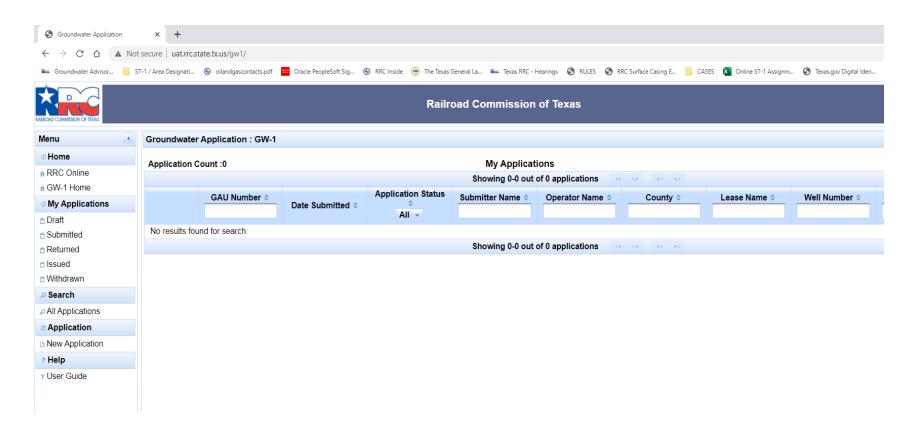
- May request radius, section, abstract, lease...
- Specify wells in "Remarks" or attachment
- Show requested area on map (lease, survey, etc.)



GW-1 Online Application 1 of 7



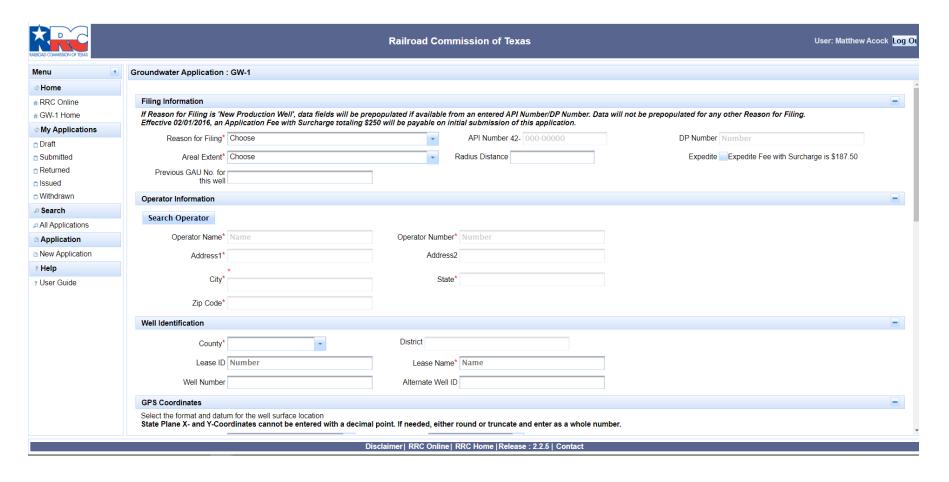
- Main menu
- Check the status of your applications
- Start a new application
- Search applications



GW-1 Online Application 2 of 7



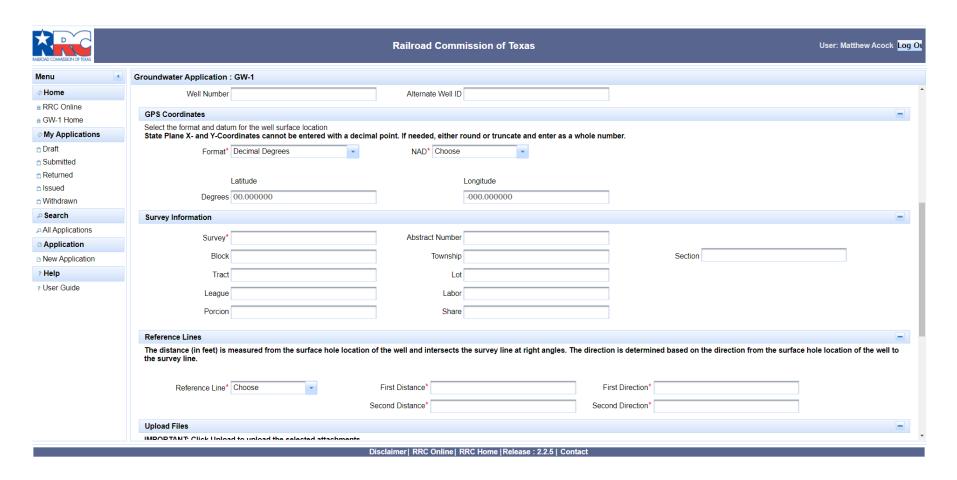
- Click "NEW APPLICATION"
- Fill out the boxes with the red *



GW-1 Online Application 3 of 7



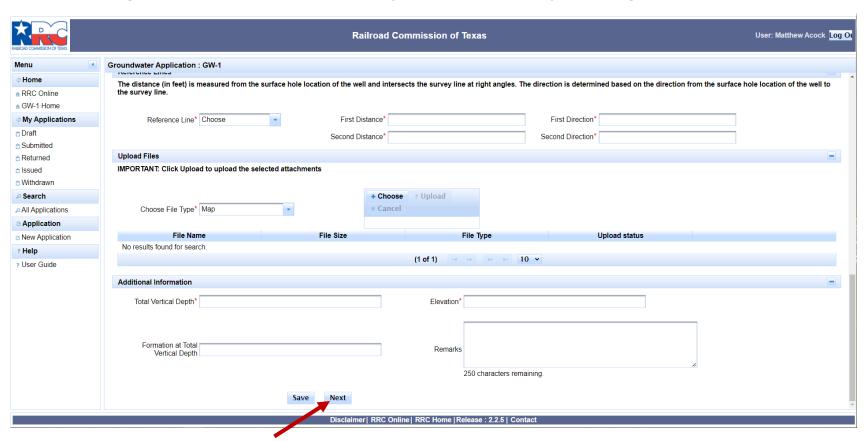
 Here is where you will enter the coordinates and survey information



GW-1 Online Application 4 of 7



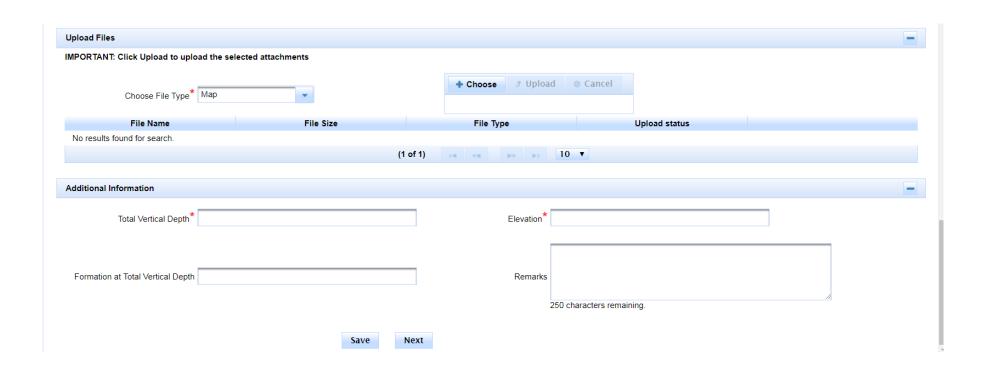
- This is the Section where you will need to upload the required attachments.
- No Special Characters (!@#\$%^&*) or Spaces



GW-1 Online Application 5 of 7



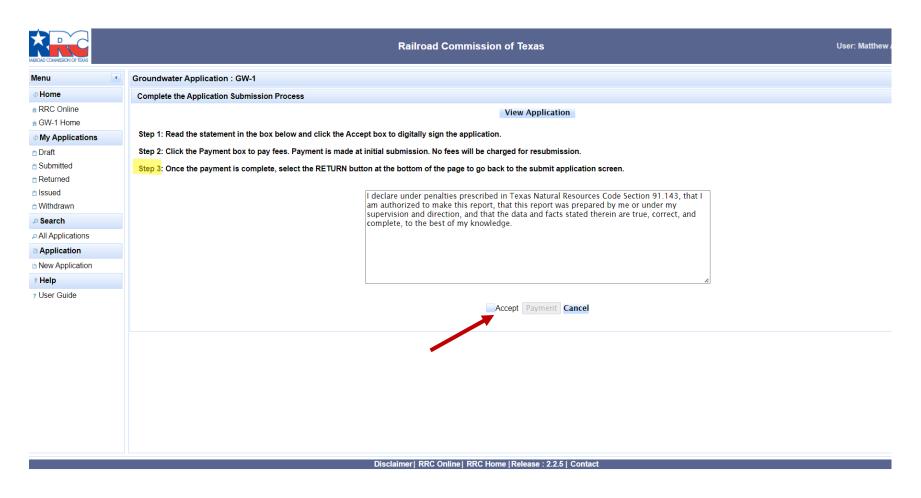
- "Next" at bottom of page accepts the terms and proceeds to payment.
 - Missing data is highlighted in red and pink
 - If system will not let you continue to next page and you do not have any highlighted errors, your application has probably "timed out" in the background



GW-1 Online Application 6 of 7



- Certification statement: Select to "Accept", then the "Payment" button to proceed to payment.
- The Payment screen is on the Comptroller web site



Payment



- "Print Confirmation" here (It's now or never!)
- Push "Return" to go back and finalize submitting the GW-1. Otherwise, the GW-1 remains in "Draft" status (not submitted)



Correct Zip Code Needed



Important News

Texas.gov Payment Services recently implemented security changes to enhance credit card validation for payments to help ensure the person making the payment is an authorized user for the credit card.

The security enhancements are in the Credit/Debit Card payment page. If the zip code entered in the address section and the credit card security code do not match the information on file with the credit card company, the payment will fail.

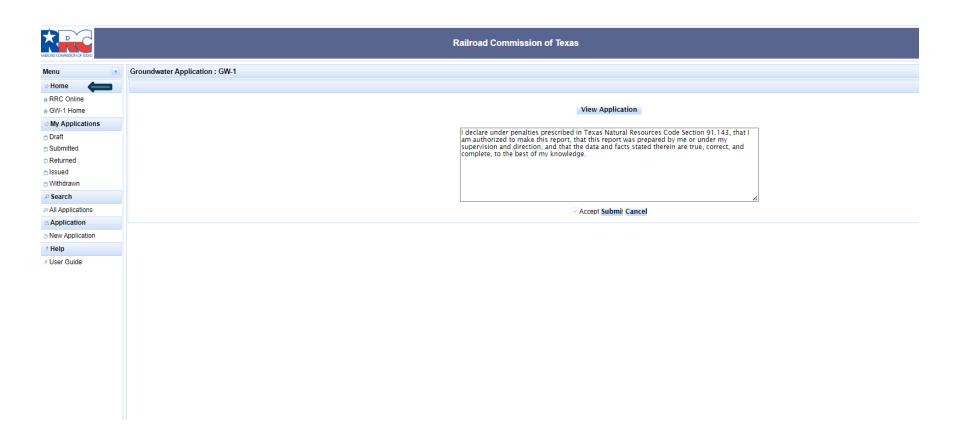
Please contact your credit card company to verify this information if your payment fails.

- Correct Zip Code Needed for All Credit Card and Debit Payments
 - Zip Code must match the Bank filed address for Card
 - This is the screen where it says "CUSTOMER ADDRESS"

GW-1 Online Application 7 of 7



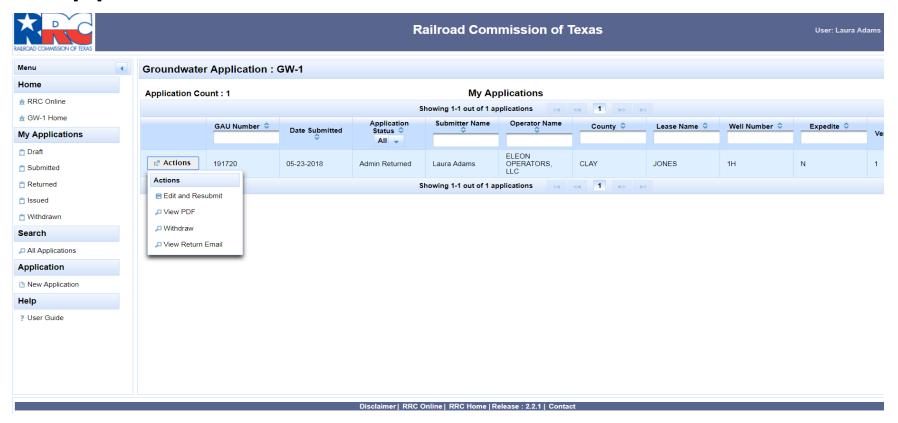
- After finding your paid for application in your draft queue, hit the ACTIONS button and select edit and submit.
- This takes you back into your application and then go down to the bottom and hit
 NEXT. This takes you to the submittal screen that will now take your application to the
 online system to start the approval processing.



Application Status



 If an application is returned, "Edit and Resubmit" to make changes to the application and resubmit.



GAU Letter Search



- Search for GAU letter using API, lease no. etc.
- Online GAU letters from June 2015 to current day.



Summary



- Filing online helps expedite
- No Special Characters (!@#\$%^&*) or Spaces
- Chrome Browser recommended
- Map/plat Info consistent with GW-1/W-1
- More data favors the desired outcome
- Shout out for more data (shallow log data)
- Questions? Rig on Location! Call Us[©]

Questions?





Questions?