

March 7, 2023

The Honorable Michael Regan
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460

Dear Administrator Regan,

On behalf of our collective organizations representing business and industry organizations across Louisiana, we are writing today to urge the approval of Louisiana's application for primacy in the regulation of the UIC Class VI injection well permitting under the Safe Drinking Water Act.

For decades Louisiana has led the way in innovation to protect our environment while responsibly producing energy to meet our nation's energy demands. We understand the interdependence of our economy and our natural resources, and that protecting our water quality and our coast is vital to safeguarding our livelihoods. We believe CCUS is a vital transformational tool to bridge our great industrial past to a lower-carbon, more sustainable, and a more productive economic future.

Louisiana has responsibly administered the other five classes of the Safe Drinking Water Act's underground injection well program and has the expertise and experience necessary to efficiently manage the EPA's Class VI wells for carbon storage. The Safe Drinking Water Act acknowledged the efficiency and efficacy of states regulating of Class VI wells by establishing a process for states to apply for primacy over the program. From managing 50,000 miles of pipelines, to facilitating the responsible production of mineral resources that fuel the world; our state has ensured a harmonious balance between protecting our communities and benefiting our economy.

The oil and natural gas industry supports \$73 billion to our state's GDP¹; our processing industry contributes \$15 billion to our GDP². Combined, our industrial sector supports more than 554,000 jobs (267,000 jobs for chemicals³+ over 287,000 jobs for oil and gas⁴). These family wage jobs come with good benefits and provide the ability for Louisiana families to both live and work in our great state for generations.

While we work hard to produce products and services to meet our nation's energy demands, we are also committed to reducing our emissions and our impact on our environment. The same skilled workforce that has made our state an energy and industrial leader is the same workforce that has the expertise to transform our industries to a lower carbon future. Industry is committed to working alongside communities, EPA, our Governor, our state regulatory agencies, our state

¹ <https://www.lmoga.com/benefits-of-the-industry/economic-impact>

² https://lca.org/aws/LCA/asset_manager/get_file/542037?ver=1

³ https://lca.org/aws/LCA/asset_manager/get_file/542037?ver=1

⁴ <https://www.lmoga.com/news/energy-industry-makes-huge-impact-on-louisianas-economy>

legislature, and our communities to ensure carbon capture projects are done safely and with meaningful engagement with underserved and vulnerable communities.

We are excited about the significant investment and commitment the Biden Administration has made to this energy future in the Bipartisan Infrastructure Deal and Inflation Reduction Act. Louisiana's combination of geology, infrastructure, point-source emitters, and workforce makes our great state the most suitable place in the country to make this future a reality. According to our Governor, CCUS has the ability to create 2,700-4,000 jobs per year on average for the next fifteen years; and an additional 1,700 to 2,500 jobs per year to operate and complete these retrofits⁵. To ensure our state and our country does not pass up this opportunity, we encourage EPA's approval of Louisiana's Class VI primacy application.

Sincerely,



CC: Ms. Radhika Fox, Assistant Administrator, Office of Water

⁵⁵ <https://gov.louisiana.gov/assets/docs/CCI-Task-force/CAP/ClimateActionPlanFinal.pdf>