ENVIRONMENTAL APPEALS BOARD
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C.

In re	)	
Pratt Zero Carbon, LLC	)	**UIC Appeal No. 26-03**
Pratt Energy CCUS #1 (PECCUS-1)	)	
Pratt County, Kansas	)	
Class VI UIC Permit No. KSS151570001	)	

RESPONSE OF PRATT ZERO CARBON, LLC TO PETITION FOR REVIEW

ATTACHMENT 7

April 14, 2026

Re: Docket Number EPA-R07-OW-2026-1585

Dear Mr. Neftali Hernandez-Santiago, Mr. Benjamin Meissner, and Mr. Nick Laskares:

My name is Walter Scott Alberg and I wanted to write to comment on some concerns for the approval of the Class VI injection well for Pratt Zero Carbon. I have been a resident and Geologist in this area since 1981. In my career I have worked as a Geotechnical Geologist, Petroleum Geologist, Environmental Geologist and lastly as the District Manager/Geologist for the KCC in District #1, before retiring to consulting geology work 6 years ago. Most of this experience has been in the central, southcentral, including Pratt County, and the southwestern counties of Kansas. I was at the meeting last Thursday evening and had asked some questions early in Public Availability Session. I wanted to follow up on that and bring a few additional points for the EPA to think over prior to issuance of the permit. I am writing this just to make sure a thorough geologic and engineering review is being conducted on this project.

The first thing I would like to comment on was the lack of attendance by the public on this matter, especially the lack of any City of Pratt, County of Pratt and any State of Kansas agencies such as the KDHE District personnel at this meeting. As far as I know the only notification was in the back pages of the Tri-County Tribune published earlier. Since this injection well falls within a three-mile radius of the City of Pratt, I am thinking the city personnel would have been notified. As I believe I mentioned to you towards the end of our conversation, the city is in the planning stages of <u>building an Ion Exchange treatment facility</u> almost directly down gradient of the proposed injection well. The distance is probably just a little over two miles and located just to the northeast of Pratt Community College. I would ask that you reach out to them (City of Pratt) to determine the location of this proposed facility, and reach out to other governing agencies to see if they have any response to this proposed injection well. I would think that basically 30 days for public to respond to a 547-page permit application is a little short and would like to think an extended period of another 60 days be allowed.

First off, thank you for taking the time to visit with me on the availability of the reports such as fall off tests, DST results, pressure tests, Electric logs, rock samples and other reports that may have been acquired through the drilling of the test well. I may be submitting an open records request to look at some of this information if it is available for review. Could you please direct me to whom this request would be directed to. Thank you in advance for this information.

The injection well bore design on page 409, shows that two sets of perforations are planned for the injection. The upper set, in the Shawnee Group from 3300’ to 3600’, and the second set in the Lansing Kansas City group from 3850-4200’. The packer set depth is not shown, but is

estimated to be at approximately 3230'. If I am not reading this wrong the injection interval would be from approximately 3,300-4,200'. With 650' of perforations, my question is, how are you going to know where the CO2gases/fluids are going? You know that the CO2gases/fluids will go to the path of least resistance and that not all the intervals perforated will be taking the injection fluids/gas. Several of the intervals perforated will most likely not have the permeability or the porosity to take the CO2 gases/fluids. The modeling conducted, the best I could determine showed the CO2 plume not migrating more than ¼ mile or so from the well bore, and then it talks about a pressure pulse reaching out as far as 2 ½ to 3 miles. On page 76 it shows a pressure pulse reaching over 2 miles in year 3 of injection. Injection of the CO2 gases/fluids into 100's of feet of perforations is most likely not a good idea.

If you take a one-mile radius from the proposed injection well you can see approximately 26 oil exploration wells that have either been completed for oil & gas or were plugged and abandoned at the completion of drilling operations. Most of these wells were drilled decades ago and the plugging procedures at that time were not the same as required today. Two of these wells are within the AOR and have been addressed in the permit application and plugging of these wells is definitely needed sooner than later. So, if the CO2gases/fluids only go into a small percentage of the perforations, how will that change the model of the distance of the plume? Some what if scenario modeling of the injection of the CO2 gas/fluids should probably be run using a smaller percentage of the formation perforations to determine plume size.

I guess what I am asking or commenting on is that the EPA conduct a thorough review of the permit, geology of the area, engineering scenarios of the plume, injection well design, including any new seismic and any other available material gathered for this project. Like yourself, I am concerned about groundwater in this area. With the location of several other oilfield test wells near the facility, their age and what if possibilities, and the proposed location of the City of Pratt Ion Exchange facility, leaves me wondering if the AOR should be expanded. All of the above should be and hopefully be thoroughly evaluated prior to the injection permit being issued. Since this will be the second permit of this type in Kansas, all possible views should be looked at prior to approval.

Thank you for your time and diligence in this matter.

Walter Scott Alberg PG

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