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Comment On: EPA-R05-OW-2025-1612-0001
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Comment submitted by Illinois Environmental Protection Agency

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General Comment

Please accept the attached comments of the Illinois Environmental Protection Agency (Illinois EPA) on Marquis Carbon Injection LLC's (Marquis Carbon Injection) Class VI Underground Injection Control Injection (UIC) Well Draft Permit (IL-155-6A-0001) for its proposed Marquis Biocarbon Project. The Illinois EPA appreciates the opportunity to provide comment.

In summary, there are aspects of Marquis Carbon Injection's UIC well evaluation that remain incomplete. The Area of Review and Corrective Action Plan identifies the former J&L well as properly plugged and abandoned but does not consider the presence or characteristics of the legacy hazardous waste the well injected into the Mt. Simon Formation. The modeling parameters appear to assume an undisturbed saline reservoir, without accounting for the dense, high chloride, and acidic fluid present within the injection interval. As a result, the pressure and plume modeling results do not reflect potential hydraulic or geochemical effects that may arise from that pre-existing hazardous waste injection.

Attachments

Illinois EPA Public Comment - Marquis Proposed Class VI Well 11-3-25