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Marquis Carbon Injection

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Comment submitted by Julia Fosdick

Submitter Information

Name: Julia Fosdick

Address:

Pontiac, IL, 61764

Email: juliefos3477@hotmail.com

Phone: 8158485692

General Comment

Marquis Biocarbon Project, Well Design and Materials

This project would be the second project site for carbon sequestration in the Mt. Simon formation. The two ADM wells were constructed with state-of-the-art materials and design. That is a questionable designation, considering they were the first sequestration wells in the whole U.S. Unfortunately, the modeling and predictions used in the design totally underestimated the corrosivity of the saline/CO₂/carbonic acid environment that was created. The ADM wells used 13 Chrome for the pipe. The well failures were discovered somewhere around seven and thirteen years. This project proposes to use 25Chrome for the portions of the well in the injection zone.

Given that these wells must remain intact for over one hundred years, what data and evidence is available to verify that 25Chrome will resist corrosion at least ten times longer than 13Chrome? The information that I could find shows it to be much more abrasion resistant, which I don't see as an issue here.

The permit specifies that CO₂ resistant cement will be used. It does not specify what that formula will be. There was evidence of cement degradation already in the ADM wells, and they used "CO₂ resistant cement". What cement is to be used here, and what data and evidence is available, verifying it's suitability to hold up for over a hundred years?

Then there is the complication of the "pickle well". This adds a whole new set of chemicals that will potentially be mixed with the saline/CO₂/carbonic acid. The well materials for the injection and monitoring wells will need to be resistant to the pickle well chemicals and all potential products of the mix, as well.

This brings to question whether the technology is actually developed adequately to construct these intrusions through the Eau Claire shale, and whether our water sources will be protected. Please show the research and data supporting these materials, if any is available.

Sincerely,

Julia Fosdick