

In re Core Energy LLC  
Appeal No. UIC 07-02  
U.S. EPA Region 5  
Response to Petition

## ATTACHMENT 2

### Core Energy Comments on Draft Permit



"Robert G. Mannes"  
<rgmannes@coreenergyllc.com>  
08/13/2007 10:52 AM

To  
Subject Draft Permit #MI-137-5X25-0001

Dear Ms. Patterson:

I have received and reviewed the USEPA Draft Permit #MI-137-5X25-0001 for the State Charlton 4-30 CO2 Injection Well.

Per the Code of Federal Regulations (40 CFR)§124.19, preservation of rights to appeal any final permit decision, I am addressing two matters via written comments on the draft permit decision. Below you find draft language cited along with a suggested rewrite and rationale to support the suggested rewrite.

- **Page 14, Part 2, Section B, #6: Precautions to Prevent Well Blowouts**  
*Current language:*

"A blowout preventer must be kept in proper operational status at all times."

*Suggested Rewrite*

"A blowout preventer must be installed and kept in proper operational condition whenever the wellhead is removed to work on said well."

*Rationale*

It is not practical or necessary to have a blowout preventer installed for the operation of a CO2 injection well. The matter of blowout prevention has been adequately addressed by the pressure limitations and wellhead construction requirements of the permit. We have a number of other Class II CO2 injection wells that operate at a higher pressure than what is being proposed under this permit and we intend to utilize a similar wellhead design for the proposed well.

- **Page 14, Part 2, Section B, #5: Automatic Warning and Automatic Shut-Off System**  
*Current language*

"A trained operator must be on site and within perceptible distance of the alarm at all times when the well is operating."

*Suggested Rewrite*

"When the well is operating, an automatic warning and shut-off system will be installed and functional. In the event of a malfunction, the well will automatically be shut-in and a trained operator will be dispatched to location."

*Rationale*

It is anticipated that injection operations at this site will take place on a continuous 24 hour basis, similar to the Class II CO2 injection operations that are being conducted in the immediate vicinity of the proposed well. It is not practical or necessary to have an operator on site at all times during the injection process. This is a remote location and the

well can be equipped in such a way that it will automatically shut in and dispatch an operator if certain, predetermined conditions are encountered at the well (ie. surface pressure is exceeded, loss of annular pressure)

We do appreciate your consideration of the issues raised herein. Should you require further information please contact me at your earliest convenience.

Thank-you.

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