



REGION 7 ADMINISTRATOR

LENEXA, KS 66219

May 23, 2024

Mr. David Mog, Plant Manager
Pratt Energy, LLC
10333 NE 30th Street
Pratt, Kansas 61274

Re: Completeness Determination of Underground Injection Control Permit Application
Pratt Energy, LLC
Underground Injection Control Program
Class VI Injection Well Permit Application

Dear Mr. Mog:

On November 30, 2023, the U. S. Environmental Protection Agency received from Pratt Energy, LLC, a permit application for a geologic sequestration well (Class VI) in Pratt, Pratt County, Kansas. In accordance with Title 40 of the Code of Federal Regulations Section 124.3(c), a completeness review was conducted on the permit application and the EPA issued a notice of deficiency on December 22, 2023. This completeness determination provided a list of the missing information which is necessary for the EPA to begin a technical review. On February 5, Pratt submitted an updated permit application to address the missing information after which the EPA conducted a second completeness determination review and issued a second notice of deficiency on March 1, 2024. This second completeness determination provided a list of remaining missing information necessary for the EPA to begin a technical review. On April 22, 2024, Pratt submitted an updated permit application to address all missing information. The EPA has concluded our completeness review of the updated permit application and have determined the permit application to be administratively complete.

The EPA did note, in the notice of proprietary business information assertion document, that Pratt is requesting information marked as PBI to remain so through the end of the post injection site care period. While the EPA acknowledges the sensitive nature of this information, any PBI pertinent to the technical suitability and financial responsibility demonstrations of the project will need to be released prior to the EPA beginning the public participation process. This will allow the public an opportunity to review the complete draft application so that an informed decision and comments can be made on all relevant material by interested parties.

Now that the permit application has been determined to be administratively complete, the EPA will begin the technical review of the information provided. The EPA's goal is to ensure forward momentum of the technical review process, as such, the EPA will be reaching out with additional questions, concerns, and requests for additional information which will be provided through the Geologic Sequestration Data Tool. Thank you for your cooperation during the completeness determination process. Please contact Marina Mahler at Mahler.Marina@epa.gov or (913) 551-7008, or Nick Laskares at Laskares.Nicholas@epa.gov or (913) 551-7166 with any questions.

Sincerely,

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SANTIAGO

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Neftali Hernandez-Santiago
Acting Supervisor
Groundwater and Drinking Water Branch