



January 13, 2026

RECEIVED

By Samantha Coldiron at 2:23 pm, Jan 13, 2026

Ms. Jessie Chmielowski
Commissioner
Alaska Oil and Gas Conservation Commission
333 West Seventh Avenue
Anchorage, AK 99501

Mr. Greg Wilson
Commissioner
Alaska Oil and Gas Conservation Commission
333 West Seventh Avenue
Anchorage, AK 99501

Dear Commissioners Chmielowski and Wilson,

Subject: Proposed changes to Title 20 Chapter 25 of the Alaska Administrative Code to adopt regulations for geologic carbon storage and establish a new Class VI Underground Injection Control program for the state of Alaska

The Energy & Environmental Research Center (EERC), a global leader in carbon capture, utilization, and storage (CCUS) research, development, demonstration, and commercialization, supports the adoption of the proposed rule changes by the Alaska Oil and Gas Conservation Commission (AOGCC). The EERC encourages the state of Alaska to proceed as expeditiously as possible to adopt these regulations so that the AOGCC can begin applying for and receiving Class VI primacy from the U.S. Environmental Protection Agency (EPA).

The state of Alaska, specifically AOGCC, is best positioned to regulate the geologic storage of carbon dioxide (CO₂) in the state. The Alaska legislature has established the legal framework for geologic CO₂ storage, and this rulemaking is the next necessary step for the state to establish a complete and comprehensive regulatory framework that ensures protection of the environment while providing the CCUS industry with regulatory certainty.

The EERC-led Plains CO₂ Reduction (PCOR) Partnership, sponsored by the U.S. Department of Energy National Energy Technology Laboratory, the North Dakota Industrial Commission's Lignite Research Program and Oil and Gas Research Program, and many public and private partners, has conducted focused research into geologic CO₂ storage since 2003. In 2019, the EERC partnered with the University of Alaska Fairbanks Institute of Northern Engineering and the PCOR Partnership region was expanded from the North American Great Plains northwest to include the state of Alaska.

To support the state of Alaska, the EERC, through the PCOR Partnership, has reviewed the proposed rule changes to Title 20 Chapter 25 of the Alaska Administrative Code. We believe the requirements meet or exceed the EPA Underground Injection Control (UIC) Class VI program requirements in the protection of underground sources of drinking water (USDWs) and other resources. AOGCC has a long history of regulatory oversight and expertise in Alaska's geology, in the implementation of the UIC program, and in the protection of Alaska's natural environment including its USDWs.

Thank you for the opportunity to comment on the proposed rule changes and adoption of the Class VI UIC program for the state of Alaska. If you have any questions or need any additional information about these comments, please contact me by email at kconnors@undeerc.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Kevin C. Connors".

Kevin C. Connors
Assistant Director for Regulatory Compliance
and Energy Policy
PCOR Partnership Program Manager

KCC/jre