



NEVADA DIVISION OF ENVIRONMENTAL PROTECTION Underground Injection Control

FACT SHEET

(pursuant to NAC 445A.874)

Permit Name: **Short Term General Permit for Resource Confirmation Testing**
Permit Number: **GU26RL**
Permit Action: **UIC Permit Renewal**

A. Permit Objective

The Nevada Division of Environmental Protection (Division) Underground Injection Control (UIC) Program proposes to issue a new General Permit, GU26RC. This general permit establishes water injection limitations, prohibitions and management practices for two separate discharge categories. Category I authorizes injections of geothermal brine into Class V injection wells for viability testing of conventional geothermal power production facilities and category two authorizes injections of Lithium brine into Class V injection wells for the purpose of viability testing for lithium brine extraction operations. The Permit is to be renewed every five (5) years.

B. Timeline

2026: This general permit was developed and proposed in 2026. Resource confirmation projects often require short term periods of injection into class V injection wells to confirm resources before the long-term operation of a facility. General permit GU26RC is proposed to reduce the permitting timeline for short term projects and standardize the application, monitoring, and reporting requirements for resource confirmation projects.

C. Application Requirements

Applicants must apply for coverage under this general permit by submitting a Notice of Intention (NOI) which requires the submittal of geographical, well construction, hydrogeological, test plan, chemical use, operational, and water quality data pertaining to the project. The applicant must also indicate which tests, chemical types, and category of injection they are seeking coverage under. The applicant will be required to monitor shallow ground water downgradient from the injection well using an existing well or by installing a new monitoring well. Upon receiving a complete application, the Division shall approve the NOI, require additional information, require the applicant to apply to obtain an individual UIC permit, or deny the NOI.

D. Discharge Categories, Testing and Chemical Categories.

Monitoring requirements and report guidelines are established for the following two (2) categories:

- **Category 1 - Geothermal injection:** Geothermal facilities that operate or intend to operate

Class V injection wells for the purpose of viability testing for geothermal energy development

- **Category 2 - Lithium Brine Injections:** Lithium brine extraction facilities that operate or intend to operate Class V injection wells for the purpose of viability testing for lithium brine extraction operations.

The applicant must choose one or more of the following to indicate the types of testing to be conducted:

- | | |
|---|---|
| <input type="checkbox"/> Reservoir tracer test | <input type="checkbox"/> Step-rate injection test |
| <input type="checkbox"/> Two-phase tracer test | <input type="checkbox"/> Constant-rate injection test |
| <input type="checkbox"/> Fall-off testing | <input type="checkbox"/> Pressure/temperature/spinner logging |
| <input type="checkbox"/> Brine compatibility test | <input type="checkbox"/> Scaling potential test |
| <input type="checkbox"/> Interference test | <input type="checkbox"/> Mechanical integrity test |
| <input type="checkbox"/> Other(s) _____ | |

The applicant must choose one or more of the following categories below to indicate what chemicals will be added to the geothermal brine

- | | |
|--|--|
| <input type="checkbox"/> Scale inhibitor | <input type="checkbox"/> Lubricants |
| <input type="checkbox"/> Two-phase tracer(s) | <input type="checkbox"/> Reservoir testing tracers |
| <input type="checkbox"/> Other(s) _____ | <input type="checkbox"/> Corrosion inhibitor |

F. Permit Requirements and Rationale

The Division has determined that the injection categories included in this general permit can be effectively regulated under a general permit rather than individual permits. This permit requires submittal of an NOI, appropriate fees and end of test reporting. Permit requirements and limitations ensure the approved injection activity is carried out in a manner which minimizes water pollution and protects public health and the environment.

G. Proposed Determination

The Division has made the tentative determination to modify and renew the proposed permit for a period of five (5) years.

H. Procedures for Public Comment:

Pursuant to NAC 445A.890.5 through NAC 445A.877, public notice of Underground Injection Control permit applications and proposed drafts is being posted on the NDEP website, and mailed to any interested persons on our mailing list, to (1) solicit written comments or objections to determinations of the Director regarding the application or permit and (2) provide the opportunity for a public hearing, if the Director determines that there is a significant level of interest from the applicant, any affected state, any affected interstate agency, the regional administrator, or any interested agency, person, or group of persons. A hearing request must be filed within the comment period and must indicate the interest of the person filing the request and the reasons

why a hearing is warranted. Any public hearing determined by the Administrator to be held must be conducted in the geographical area of the proposed discharge or any other area the Administrator determines to be appropriate. All public hearings must be conducted to accordance with NAC 445A.238 and the final determination of the Administrator may be appealed to the State Environmental Commission pursuant to NRS 445A.605.

Any person wishing to submit comments or request a hearing must do so by email/mail, which must be sent/postmarked or hand delivered within thirty (30) days to:

Department of Conservation & Natural Resources
Nevada Division of Environmental Protection
Bureau of Water Pollution Control | Permits Branch
Attn: Underground Injection Control Permit Writer
901 S. Stewart Street, Suite 4001
Carson City, NV 89701

Prepared by: Lisa Aleman

Date: May 22, 2025