



March 24, 2022

Re: Concerns with SF 1919

Dear Chair Utke and members of the Health and Human Services Finance and Policy Committee:

The League of Minnesota Cities appreciates the opportunity to submit comments related to S.F. 1919. Providing adequate protection for public and private drinking water supplies is a key role of the state that cities see as essential. We do not feel that this proposed change to well drilling and use standards is wise or warranted at this time and would respectfully request that the legislature not to move it forward at this time.

Minnesota cities spend millions of dollars each year to ensure that their residents and businesses have access to safe, affordable, and reliable water supplies. To accomplish that, we rely on state laws and rules that regulate well-drilling standards and operation, separation requirements, and the maintenance and closure of wells. State law does not allow cities to have jurisdiction over those aspects of well drilling. Cities rely on the Minnesota Department of Health to develop and enforce those standards.

The a2 delete-all amendment to S.F. 1919 creates new allowances for submerged closed loop heat exchangers. The changes proposed in the a2 amendment would allow new uses of wells, with potential exposure of groundwater to a type of heat exchange system that is not currently allowed and without separation requirements from existing drinking water supplies, either public or private. While there is great potential to use geothermal heat exchange in closed-loop systems as an alternative to other forms of heating and cooling, protection of drinking water sources must be maintained. Bored geothermal heat exchange systems, for example, are an established technology that has numerous regulatory safeguards to prevent contamination of water supplies, including limitations on fluids used, specific piping and system construction standards, and separation requirements from water supply wells.

This technology may develop into a manageable option in the future, but the League would request that the proposers work with the Department of Health through normal variance and pilot project demonstrations to establish protocols to safely operate these systems while protecting drinking water sources. We appreciate the time and attention that the author, the chair, the committee, and the Department of Health have spent considering this issue.

Sincerely,

A handwritten signature in black ink that reads 'Craig A. Johnson'. The signature is written in a cursive, flowing style.

Craig A. Johnson
Intergovernmental Relations Representative
League of Minnesota Cities