

# Minutes: Submerged Closed Loop Heat Exchangers Advisory Committee

**Date** November 12, 2025, 8:30 – 9:30 a.m.

**Location** Virtual Teams Meeting

**Attendees** **Virtual:** Danny Nubbe (Certified Representative), Dave Traut (Certified Representative), Jay Egg (Geothermal Professional), Jeff Luehrs (Delegated Well Program), Keith Larson (Geothermal Professional), Willy Miley (Geothermal Professional), Danny Nubbe (Certified Representative), David Traut (Certified Representative), Jeremy McConkey (Professional Association), Todd Blomstrom (City Representative)

**MDH:** Jon Olson (WMS Technical Unit Supervisor), Teresa Purrington (WMS Program Manager), Jennifer Weier (WMS Hydrologist Supervisor), Kara Dennis (WMS Hydrologist), Jacquie Cavanagh (Rulemaking

## Acronyms and Terms

MDH – Minnesota Department of Health

SCLHE – Submerged Closed Loop Heat Exchangers

WMS – Well Management Section

## Welcome and updates

Olson called the meeting to order at 8:31 AM and provided an overview of the expedited rulemaking process authorized by Minnesota Statutes, chapter 103I.208, subdivision 3, which could be used to amend the SCLHE rules. Olson reminded the committee that after the permanent SCHLE rules were adopted May 26, 2025, the agency initiated the expedited process to make amendments. Under this process, any revision must be directly related to SCLHE systems. A notice of the proposed amended rules must be published by December 31, 2025. Olson provided a proposed timeline for adoption if the rule amendments are adopted without a hearing vs. with hearing, explaining a hearing would be required if we receive 50 or more requests and move the process into “normal rulemaking” - likely resulting in a delay in adoption of six to nine months.

## Committee feedback on proposed rule revisions

**All citations reference proposed revisions draft were provided to committee members prior to this meeting.**

- **4725.1834 Subp. 7, item H (2):** Miley suggested amending the timeline to report the product or component responsible for a pressure loss or leak from 30 to 60 days.
- **4725.3050 Subp. 9 Grouting:** Traut said the language “without creating voids” is problematic and suggested rewording the language so that it more clearly meets the intent of the rule. *“To attempt to prevent any voids, place bentonite chips or bentonite pellets to avoid gaps or bridging.”* Egg’s suggested language includes *“place bentonite chips or bentonite pellets in a manner **that prevents bridging** in the annular space; and....”* Egg said it is the driller's job is to prevent bridging and if we state that clearly, it automatically ensures no voids are created, and it is a cleaner, more enforceable standard that achieves MDH's goal.
- **4725.2750, Item E Screens; Screen Leaders, Risers, and Sumps:** Miley suggested removing all of the language in proposed part E starting with, *“If the well is constructed in unconsolidated materials....”* He added that if MDH does not make this change, he recommended dropping the “third-party” requirement of proposed sub-item (1)
- **4725.2750, Item D Screens; Screen Leaders, Risers, and Sumps:** Traut recommended the term *screen blank* instead of adding the term *casing*. He argued it is more important that the entire screen unit is constructed with the same materials, and a well casing materials are different than screen materials. Weier said MDH would consider his proposal as an addition, but well casing is what is being used between separate screens in practice. There are many terms industry could use for the pipe or component that is installed between the screens, and MDH wants to broadly capture all of them. Nubbe stressed the leader or piece separating the screens should be made of the same material as the screen. Miley said that the “*casing blank*” between two screens does not have the same purpose as casing above the screens.
- **4725.7075, subpart 4, item F SCLHE System Installation:** Miley suggested that sub-item(1) should be amended to add licensed professional engineer to the list of professionals who can conduct a pressure test. Larson disagreed with proposed amendment. He said that the PE license designation is too broad to do such specific work.
- VanKeulen stressed that there should be a third party witnessing the pressure test (item F, sub-item (2)) and a building official could be added to the list of witnesses. Weier clarified that the rules already require the person witnessing the pressure test to be a third party. She said MDH discussed adding building officials to the list in the previous rulemaking and will revisit that suggestion and decision. McConkey stressed that the manufacturer cannot be witnessing the pressure test, and Nubbe stressed the importance of third-party verification. Egg suggested the proposed language, *“...witnessed by a third party who is a Department of Health inspector, licensed professional engineer, licensed plumber, well contractor, or bonded mechanical contractor, provided the third party is not the same individual, nor employed by the same company, that conducted the test under subitem (1).”* Nubbe asked what type of well contractor license is required by rule to conduct the pressure test, and Weier specified that the definition of the term *well contractor* requires that it is an individual with the full well contractor license.
- Miley recommended including the International Ground Source Heat Pump Association (IGSHPA) accreditation in the list of professionals that can conduct and witness a pressure test. There was

mixed feedback about IGSHPA accreditation. Committee members reported they had little knowledge of IGSHPA accreditation, the accreditation is easy to obtain, or that it is an alternative for a mechanical certification.

## Adjournment

Olson extended his appreciation for the time and feedback of the rulemaking committee and adjourned the meeting at 9:30 AM.

11/12/2025

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