Plan revision number: 0
Plan revision date: 10/1/2022

AREA OF REVIEW AND CORRECTIVE ACTION PLAN SUMMARY
40 CFR 146.84(b)

Brown Pelican CO2 Sequestration Project

1.0 Facility Information 2
2.0 Computational Modeling Approach 2
3.0 Re-Evaluation Schedule 2

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1.0 Facility Information

Facility name: Brown Pelican (BRP) CO_2 Sequestration Project
Brown Pelican CCS 2 Well (BRP CCS 2)

Facility contact: Caroline Huet, Carbon Management Certification Lead
5 Greenway Plaza, Houston, TX 77046
713-215-7255, caroline_huet@oxy.com

Well location: [redacted]

2.0 Computational Modeling Approach

Pursuant to §146.86, this plan delineates the Area of Review (AoR) and describes the corrective action plans for wells that require corrective action. Delineation of the AoR is one of the key elements of the Class VI Rule to ensure Underground Sources of Drinking Water (USDW) in the region surrounding the geologic sequestration project may not be endangered by the injection activity.

The AoR is the region surrounding the geologic sequestration project where USDWs may be endangered by the injection activity. The AoR is delineated using multiphase CO2-brine transport computational modeling, constructed from a geocellular model that accounts for the site-specific hydrogeology and the physical and chemical properties of all phases of the injected carbon dioxide stream and displaced fluids. The AoR delineation is based on available site characterization, monitoring, and operational data as set forth in §146.84.

3.0 Re-Evaluation Schedule

At a fixed frequency specified in the AoR and Corrective Action Plan, or more frequently when monitoring and operational conditions warrant, OLCV must reevaluate the AoR and perform corrective action in the manner specified in 40 CFR 146.84. OLCV must also update the AoR and Corrective Action Plan or demonstrate to the UIC Program Director that no update is needed.

Following each Area of Review and Corrective Action Plan reevaluation or demonstration showing that no new evaluation is needed, OLCV shall submit the resultant information in an electronic format to the UIC Program Director for review and approval of the results. Once approved by the UIC Program Director, the revised Area of Review and Corrective Action Plan will become an enforceable condition of this permit.