Message

From: bheard@gcscarbon.com [bheard@gcscarbon.com]
Sent: 3/18/2021 4:06:41 PM
To: Dorsey, Nancy [Dorsey.Nancy@epa.gov]; Johnson, Ken-E [Johnson.Ken-E@epa.gov]
CC: 'Ross Andrews' [randrews@gcscarbon.com]; 'Pete Jackson' [pjackson@gcscarbon.com]; 'Holmstead, Jeff' [jeff.holmstead@bracewell.com]; 'Stephen Lee' [Stephen.Lee@la.gov]; 'Corey Shircliff' [Corey.Shircliff@la.gov]; Ussery, Ian [Ussery.Ian@epa.gov]; Yun, Samuel [Yun.Samuel@epa.gov]; Fontenot, Brian [Fontenot.Brian@epa.gov]
Subject: RE: GCS CBI Submittal - Class VI Project Summary
Attachments: ATT00001.txt

Thanks Nancy. I appreciate the clarification. We will forge ahead and look forward to connecting on needed clarification for EPA/DNR on our submittals. All the best.

BENJAMIN HEARD
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From: Dorsey, Nancy <Dorsey.Nancy@epa.gov>
Sent: Thursday, March 18, 2021 11:04 AM
To: bheard@gcscarbon.com; Johnson, Ken-E <Johnson.Ken-E@epa.gov>
Cc: 'Ross Andrews' <randrews@gcscarbon.com>; 'Pete Jackson' <pjackson@gcscarbon.com>; 'Holmstead, Jeff' <jeff.holmstead@bracewell.com>; 'Stephen Lee' <Stephen.Lee@la.gov>; 'Corey Shircliff' <Corey.Shircliff@la.gov>; Ussery, Ian <Ussery.Ian@epa.gov>; Yun, Samuel <Yun.Samuel@epa.gov>; Fontenot, Brian <Fontenot.Brian@epa.gov>
Subject: RE: GCS CBI Submittal - Class VI Project Summary

Hi Ben,

Yes, I tend to incorrectly mix AoR and Corrective Action Plan or shorten it as they seem to always be linked. I will try to be more correct. ☺

Please, forge ahead as you have things ready. I will set up a meeting in Teams. For the afternoon of the 31st with LDNR and HQ if any of our folks are available.
Nancy

From: bheard@gcscarbon.com <bheard@gcscarbon.com>
Sent: Thursday, March 18, 2021 10:39 AM
To: Dorsey, Nancy <Dorsey.Nancy@epa.gov>; Johnson, Ken-E <Johnson.Ken-E@epa.gov>
Cc: 'Ross Andrews' <randrews@gcscarbon.com>; 'Pete Jackson' <pjackson@gcscarbon.com>; 'Holmstead, Jeff' <jeff.holmstead@bracewell.com>; 'Stephen Lee' <Stephen.Lee@la.gov>; 'Corey Shircliff' <Corey.Shircliff@la.gov>; Ussery, Ian <Ussery.Ian@epa.gov>; Yun, Samuel <Yun.Samuel@epa.gov>; Fontenot, Brian <Fontenot.Brian@epa.gov>; 'Corey Shircliff' <Corey.Shircliff@la.gov>
Subject: RE: GCS CBI Submittal - Class VI Project Summary

Nancy,

Thanks. I am wide open on March 31st in the afternoon. Please let us know a time that works for you.

In regards to the AoR Action Plan, do you mean the Corrective Action Plan? If so that will be submitted later today via GSDT and the OneDrive for Confidential Data with the update to the AoR module. Also we are working on a document that sets forth a brief explanation of the assertion of CBI as you suggest below. Although I do not expect that to be completed today it is going to be completed and submitted prior to our meeting. Please let me know if that timing presents any challenges for EPA.

Thanks and we look forward to speaking on the 31st.

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From: Dorsey, Nancy <Dorsey.Nancy@epa.gov>
Sent: Wednesday, March 17, 2021 3:48 PM
To: Benjamin Heard <bheard@gcscarbon.com>; Johnson, Ken-E <Johnson.Ken-E@epa.gov>
Cc: 'Ross Andrews' <randrews@gcscarbon.com>; 'Pete Jackson' <pjackson@gcscarbon.com>; 'Holmstead, Jeff' <jeff.holmstead@bracewell.com>; Stephen Lee <Stephen.Lee@la.gov>; Corey Shircliff <Corey.Shircliff@la.gov>; Ussery, Ian <Ussery.Ian@epa.gov>; Yun, Samuel <Yun.Samuel@epa.gov>; Fontenot, Brian <Fontenot.Brian@epa.gov>; Corey Shircliff <Corey.Shircliff@la.gov>
Subject: RE: GCS CBI Submittal - Class VI Project Summary

Hi Ben,

Are you available at some time during the afternoon on the 31st to discuss various submission issues or rather work arounds? We are looking at cross-walks so we know where to find the different pieces of information.

Some of the submittal materials use the same name in several places depending on what we are looking at so, the AoR Action Plan while a Plan isn't submitted under Plans but in the AoR section. Which makes more sense, but is confusing.

regards
Nancy

From: Benjamin Heard <bheard@gcscarbon.com>
Sent: Monday, March 15, 2021 11:00 AM
To: Johnson, Ken-E <Johnson.Ken-E@epa.gov>; Dorsey, Nancy <Dorsey.Nancy@epa.gov>
Cc: 'Ross Andrews' <randrews@gcscarbon.com>; 'Pete Jackson' <pjackson@gcscarbon.com>; 'Holmstead, Jeff' <jeff.holmstead@bracewell.com>; Stephen Lee <Stephen.Lee@la.gov>; Corey Shircliff <Corey.Shircliff@la.gov>; Ussery, Ian <Ussery.Ian@epa.gov>; Yun, Samuel <Yun.Samuel@epa.gov>; Fontenot, Brian <Fontenot.Brian@epa.gov>
Subject: Re: GCS CBI Submittal - Class VI Project Summary

Nancy,

Thanks for the note. There are several issues obviously in your note.

For a little clarity on what we will be filing over the next several weeks. We will be submitting the Project Narrative in about two weeks. The delay there is due to a desire to complete the well construction section. In that submittal we will be sending the Plugging Report as well to the Project Summary.

Further we will be submitting an updated AoR to the module this week which will include the Corrective Action Plan. I am not sure what an AoR action plan is however.

After the next 2 weeks all materials, except Pre-Operational Testing and Financial Assurance will be delivered.

Happy to connect via Teams to review the timing of reports as well as the other issues you discussed (CBI and PISC). Please let us know some times next week which might work for EPA.

Many thanks.

Sent via the Samsung Galaxy S8, an AT&T 5G Evolution capable smartphone
Get Outlook for Android

From: Dorsey, Nancy <Dorsey.Nancy@epa.gov>
Sent: Monday, March 15, 2021, 9:38 AM
To: bheard@gcscarbon.com; Johnson, Ken-E
Cc: 'Ross Andrews'; 'Pete Jackson'; 'Holmstead, Jeff'; Stephen Lee; Corey Shircliff; Ussery, Ian; Yun, Samuel; Fontenot, Brian
Subject: RE: GCS CBI Submittal - Class VI Project Summary

Thanks Ben.

After our earlier discussions on how information could be supplemented later in a Class VI application, we have looked more closely at the set-up and the information requirements. There apparently isn't an easy way to do modifications within the system particularly for the Project Information and AoR Review. We do need the basic geologic background before we can to anything. According to regulations, we are supposed to verify applications are complete before beginning the review.

With anticipated workloads getting a jump start could be useful if a method to avoid repeating the same thing can be devised. For example, using either the CBI folder to discuss interim points back and forth, or arrange controlled Teams meetings? Perhaps we should set up a short call to discuss possible processes, including LDNR?

A unofficial few notes on your most recent submissions:
For redaction in the pdfs, is there a way either "CBI" or "CBI + why" can be labelled over the black boxes? Alternatively could you add an explanation on an additional page, close to the front of the document? There are two or three standing FOIA's for everything submitted.

The Project Plan should not actually have accepted your submission without the AOR Action plan.

I noticed he alternative PISC is only one page, and the required PISC Project Plan has been relabeled as alternative. This appears to assume only one report will work and that for your proposed alternative

plan. We are discussing this with HQ, but our initial reaction is the requirement was not properly understood, those are two separate requirements with overlapping information. We will get back with you on that. But the PISC plan is as much about procedures as results and is separative from a plan dropped from 50 years to 10.

Regards,
Nancy

From: bheard@gcscarbon.com <bheard@gcscarbon.com>
Sent: Saturday, March 13, 2021 8:13 AM
To: Dorsey, Nancy <Dorsey.Nancy@epa.gov>; Johnson, Ken-E <Johnson.Ken-E@epa.gov>
Cc: 'Ross Andrews' <randrews@gcscarbon.com>; 'Pete Jackson' <pjackson@gcscarbon.com>; 'Holmstead, Jeff' <jeff.holmstead@bracewell.com>
Subject: GCS CBI Submittal - Class VI Project Summary

Ken and Nancy,

I wanted to let you know that last night GCS submitted an update to its Class VI permit for Project Minerva. We have submitted Project Summaries for each of the

1. Testing & Monitoring Program
2. Alternative PISC and
3. Emergency and Remedial Response Plan.

Please let us know if you have any questions. We trust you are having a good weekend. All the best.

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