Message

From: Rao, Kate [Rao.kate@epa.gov]
Sent: 9/4/2020 5:52:38 PM
To: Albright, David [Albright.David@epa.gov]
Subject: FW: CES modeling evaluation
Attachments: CES AoR Modeling Evaluation.docx

FYI

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From: Shari Ring <Shari.Ring@cadmusgroup.com>
Sent: Friday, September 4, 2020 10:43 AM
To: Ho, Yenhung <Ho.Yenhung@epa.gov>; Rao, Kate <Rao.kate@epa.gov>
Cc: MaryEllen.Tuccillo@cadmusgroup.com; Kyrien Edwards <kyrien.edwards@cadmusgroup.com>; Jim Jolley <james.jolley@cadmusgroup.com>; jameswalker733@outlook.com; Galen Laurence <galen.laurence@cadmusgroup.com>
Subject: CES modeling evaluation

Hi Calvin and Kate,

Attached is the draft AoR modeling evaluation report for the CES project. This report summarizes the findings of our review of Attachment B to the permit application and associated files submitted to the GSDT. It also evaluates some elements of the PISC and Site Closure Plan that are based on the AoR modeling (other elements of that plan will be addressed in forthcoming reports on testing and monitoring strategy and well plugging activities).

Given that there are significant data gaps at this stage of model development, we focused on the modeling approach and consistency of use of information. The general model setup and the estimation methods used, especially when data are sparse, are adequate for this preliminary model. We requested some additional description for some data inputs that were not fully explained.

We understand that the applicant will be able to refine the model once the pre-operational testing has been done. The refinements will include more site-specific data (that reflect the pre-operational testing objectives discussed in the geologic evaluation report). For some topics (e.g., storage capacity estimates), we do not yet know if the applicant will be applying the same methods or will use more detailed approaches once better data are available.

Please let us know if you have any comments or questions about the attached.

Have a great weekend.

Shari Ring
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