Message

From: Ho, Yenhung [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=0373CF6F13A849F1BB61BB1D1B64F981-YHO]
Sent: 11/13/2020 6:02:55 PM
To: McEvoy, Molly [mcevoy.molly@epa.gov]
Subject: RE: Technical Response #2 - Inquiry

Thanks Molly -- this is what I needed!

Next, I will work with Cadmus to provide CES with recommendation for additional consideration of a C6 ERRP.

Best regards,
Calvin

From: McEvoy, Molly <mcevoy.molly@epa.gov>
Sent: Thursday, November 12, 2020 3:20 PM
To: Ho, Yenhung <Ho.Yenhung@epa.gov>
Subject: RE: Technical Response #2 - Inquiry

Hi Calvin,

Per our discussion over the phone, I agree with Cadmus' and R9's assessment that there are few requirements for what needs to be included in a Class VI emergency and remedial response plan. The questions posed by CES are more specific than those minimum requirements and recommendations outlined in the federal regulations and guidance documents. In application reviews, EPA should only request additional information that is needed for the Region to determine that the project will be protective of underground sources of drinking water. EPA may recommend additional considerations.

Let me know if you need anything else.

Best,
Molly

From: Ho, Yenhung <Ho.Yenhung@epa.gov>
Sent: Thursday, November 12, 2020 1:19 PM
To: McEvoy, Molly <mcevoy.molly@epa.gov>
Subject: RE: Technical Response #2 - Inquiry

Hi Molly,

Sure, I can call you at around 11am PST (2pm EST) if that works. CES provided the below specific questions during the call. Thanks. Calvin

- Does EPA need a qualitative or quantitative risk assessment?
- Does the register need to reflect how risk might change when a response occurs and/or the degree of success of risk responses?
- What is EPA's a preference for how risk is evaluated, e.g., should they use NRAP tools? (These tools use geomechanical data, fracture orientation, operational information, etc. to model the stress and expected seismic response associated with various injection pressures, and could be used to demonstrate that risk has been reduced or mitigated.)

From: McEvoy, Molly <mcevoy.molly@epa.gov>
Sent: Thursday, November 12, 2020 9:54 AM
To: Ho, Yenhung <Ho.Yenhung@epa.gov>
Subject: RE: Technical Response #2 - Inquiry

Hi Calvin,

Sorry for the delay. Would you have time for a quick phone call to discuss as some point today?

From: Ho, Yenhung <Ho.Yenhung@epa.gov>
Sent: Thursday, November 5, 2020 4:03 PM
To: McEvoy, Molly <mcevoy.molly@epa.gov>
Subject: FW: Technical Response #2 - Inquiry

fyi

From: Natalie Nowiski <NNowiski@slb.com>
Sent: Tuesday, October 27, 2020 11:35 AM
To: Albright, David <Albright.David@epa.gov>; Ho, Yenhung <Ho.Yenhung@epa.gov>
Cc: 'Rebecca Hollis' <rhollis@cleanenergysystems.com>
Subject: Technical Response #2 - Inquiry

Dear Calvin and David,

Hope you are both doing well. CES is in the process of finalizing the response to the Technical Evaluation Comments and Information Request #2, which will be submitted by October 31, 2020.

In Enclosure #1, EPA recommended that, "*for each scenario, the following be identified: severity of the impact, likelihood of the event; timing of the event; avoidance measures in place to reduce the likelihood of the event; detection methods that reflect planned testing and monitoring; response personnel; and equipment.*" As part of the response, the attached draft of the Project Risk Registrar was prepared to address these issues.

Can you please review and confirm whether the values of the "likelihood" and "severity" are acceptable at this time, or whether EPA would prefer that the values be separated into different categories (ie. Injury/Fatality; amount of damage; impact on project, etc.) for the scenarios that are identified. Please note that the analysis is preliminary given the stage of the project, and will be need to be updated, expanded upon and re-performed as more data becomes available.

Finally, would it be possible to arrange a telephone call next week to discuss questions regarding the risk assessment scenario process in general for Class VI Permitting Applications? We note that there are many different tools that can be utilized to perform these risk assessments, some which utilize a qualitative approach, and others which are quantitative or semi quantitative in nature. We were hoping to obtain further information and guidance as to which methodologies are best suited / preferred by the EPA for Class VI Permitting.

Please let me know if you have any questions or require further clarification.

Best regards,
Natalie

Natalie Nowiski
CCS Business Developer and Legal Counsel

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