UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

July 12, 2022

Ms. Kelly Watson, PE
Oxy Low Carbon Ventures, LLC
5 Greenway Plaza
Houston, TX 77046

RE: Underground Injection Control (UIC) Permit Application R06-LA-0004
Class VI Pre-Construction Permit Application
Technical Review of Application

Dear Ms. Watson:

Upon completing the initial phase of the technical review for the UIC Class VI permit application submitted by Oxy Low Carbon Ventures LLC for YAMS CCS wells 1 and 2, EPA Region 6 has determined that the application does not meet the requirements in 40 CFR §146 Subpart H.

The review team determined that insufficient site data was used to define the geologic structure and hydrogeologic properties of the proposed storage site and overlying formations as required by 40 CFR §146.83. Site data should be based on primary sources, such as geologic cores, outcrop data, seismic surveys, well logs, and lithologic descriptions. This data should define properties, including the depth, areal extent, thickness, mineralogy, porosity, permeability, and capillary pressure of the injection and confining zone(s).

Although detailed extrapolations were carried out using the available data, parameters derived from a single artificial penetration at an undisclosed location outside of the AOR do not provide sufficient basis for accurately characterizing potential site heterogeneity. In addition to core data, our review team needs more site-specific data to confirm that local faulting does not penetrate the confining zones in the potential project area.

The attachment accompanying this letter details the deficiencies resulting from the lack of site-specific data. After discussions internally and with the Louisiana Department of Natural Resources, it was determined that these deficiencies could be addressed through additional clarifications and/or the drilling of one or more stratigraphic test wells closer to the site with appropriate logging, coring, and hydrologic data collection.

If you have any questions, please contact Brody Friesenhahn at (214) 665-7259 or Friesenhahn.brody@epa.gov.

Sincerely,

KENNETH JOHNSON

Digitally signed by KENNETH JOHNSON
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Ken Johnson, PE
Ground Water / UIC Section Chief