Message

From: Keith Bowman [kbowman@capturepointsolutions.com]
Sent: 4/13/2022 9:15:57 PM
To: Johnson, Ken-E [Johnson.Ken-E@epa.gov]
CC: Tracy Evans [tevans@capturepointsolutions.com]
Subject: The Arbuckle Formation in Northeast Oklahoma and Class VI permitting

Good afternoon Ken,

We hope you and staff are enjoying all the work and the Spring season.

We thought it would be beneficial and constructive to reopen the lines of communication concerning the topic of Arbuckle Formation CO_2 sequestration in Oklahoma and northern Kansas. At the same time specifically discussing CO2 storage in the Arbuckle at the North Burbank Unit located in northwestern Osage County.

We last discussed this subject on a conference call with you and staff on the afternoon of September 10, 2021. Your staff voiced observations and concerns of which I have listed below:

- Seismicity seemed to be the hot topic from origin-cause and prediction to the local structural fabric within the Cherokee Platform.
- General comments on age of field (100 years old) well density (10 acre spacing), past completion practices and the previous operators' tertiary miss-steps were recognized.
- The confining bed extent and its seal capacity were questioned along with a continued priority of USDW monitoring and protection.

Since our last discussion we have completed a significant amount of additional work regarding the site including geophysical, subsurface, and engineering work regarding the NBU site to address each of the concerns stated in our prior call. Our goal is to be very transparent in our evaluation of the Arbuckle in Osage County and have held several meetings with the various Oklahoma regulatory agencies, OGS, OCC, ODEQ, EE and the Energy Secretary. The feedback from all these agencies has been supportive of evaluating the Arbuckle in Osage County for a Class VI permit. A quick question, does or has the EPA had a mandate, petition, or policy drafted to explicitly limit, stop, or curtail Arbuckle injection in Oklahoma and specifically on Tribal lands in northeastern Oklahoma?

We would like to request an in-person meeting to discuss the work we have done to date in reference to the suitability of an Arbuckle Class VI injection site with-in the North Burbank Unit. We are open to meeting at EPA offices, our offices or an off-site location of your preference. Please send us a schedule of days and times you are available. If required/needed all our attendees would be vaccinated and boosted. We look forward to getting together.

Regards,

Keith

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