POST-INJECTION SITE CARE AND SITE CLOSURE PLAN SUMMARY
40 CFR 146.93(a)

Brown Pelican CO_2 Sequestration Project

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1.0 Facility Information

Facility name: Brown Pelican (BRP) CO_2 Sequestration Project
Brown Pelican CCS 2 Well (BRP CCS 2)

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Well location: [redacted]

This Post-Injection Site Care and Site Closure (PISC) plan describes the activities that Oxy Low Carbon Ventures, LLC (OLCV), will perform to meet the requirements of 40 CFR 146.93. OLCV will monitor ground water quality and track the position of the carbon dioxide (CO_2) plume and pressure front for 50 years or for the duration of an alternative timeframe approved by the Director pursuant to the requirements of 40 CFR 146.93(c) unless OLCV makes a demonstration under 40 CFR 146.93(b)(2). Pursuant to 40 CFR 146.93(b)(3), OLCV will continue post-injection site care until the UIC Program Director approves a demonstration that no additional monitoring is needed to ensure non-endangerment of Underground Sources of Drinking Water (USDW). Following approval for site closure, OLCV will plug all monitoring wells, restore the site to its original condition, and submit a site closure report and associated documentation.

2.0 Overall Strategy and Approach for Post-Injection Site Care and Closure

After the injection ceases, the project will plug and abandon the injector wells according to the plugging procedure proposed in the Plugging Plan document. Additional monitoring wells will be drilled as proposed in the phased approach of the monitoring plan provided in the Testing and Monitoring Plan document.

Planned groundwater quality monitoring and plume and pressure front tracking during the post-injection phase will meet the requirements of 40 CFR 146.93(b)(1). The results of all post-injection phase testing and monitoring will be submitted annually, within 60 days of the anniversary of the date that injection ceases. The post-injection monitoring program will focus on the tracking of the projected CO_2 plume migration.

During the PISC period, the monitoring reports will be prepared annually and submitted to the EPA Region 6 UIC Branch Office. These reports will summarize methods and results of ground water quality monitoring, CO_2 storage zone pressure tracking, and indirect geophysical monitoring for CO_2 plume tracking.

The PISC and Site Closure Plan will be reviewed every 5 years during the PISC period. Results of the plan review will be included in the PISC monitoring reports. The operational and monitoring results will be reviewed for adequacy in relation to the objectives of the PISC. The monitoring locations, methods, and schedule will be analyzed in relation to the size of the CO_2 storage zone, pressure front, and protection of USDWs. In case of changes to the PISC plan, a modified plan will be submitted to the EPA Region 6 UIC Branch Office at least 30 days before the planned initiation of the changes.

Prior to approval of the end of the post-injection phase, OLCV will submit a demonstration of non-endangerment of USDWs to the UIC Program Director, per 40 CFR 146.93(b)(2) and (3).

OLCV will conduct site closure activities to meet the requirements of 40 CFR 146.93(e) as described below. OLCV will submit a final Site Closure Plan and notify the permitting agency at least 120 days prior of its intent to close the site. Once the permitting agency has approved closure of the site, OLCV will plug the monitoring wells and submit a site closure report to EPA. The activities, as described below, represent the planned activities based on information provided to EPA. The actual site closure plan may employ different methods and procedures. A final Site Closure Plan will be submitted to the UIC Program Director for approval.

Upon conclusion of the post-injection site care period, all monitoring wells will be plugged and capped below grade in accordance with the approved Plugging and Abandonment Plans. Before the wells are plugged, the internal and external integrity of the wells will be confirmed. The results of this logging and testing will be reviewed and approved by the appropriate regulatory agencies prior to plugging the wells.

After the completion of the plugging activities, a plugging report will be submitted to the UIC Program Director describing the methods used and tests performed on the well during plugging. This report will be submitted to the UIC Program Director within 60 days of completing the plugging activities.

At the end of the PISC phase, OLCV will ensure the site is reclaimed and returned to predevelopment condition to meet the requirements of 40 CFR 146.93(e).