# ATTACHMENT H

# POST-INJECTION SITE CARE AND SITE CLOSURE PLAN [40 CFR 146.93(a)]

## 1. FACILITY INFORMATION

Facility name: River Parish Sequestration – RPN 1

Facility contact: Andrew Chartrand, VP, Regulatory and Environmental
1333 West Loop South, Suite 830, Houston, TX 77027
832-696-0052, andrew.chartrand@blueskyinfrastructure.com

Well location:

| Well | Parish/State | Latitude (NAD27) | Longitude (NAD27) |
|---|---|---|---|
| RPN-1-INJ | Ascension, LA | [redacted] | [redacted] |

## 2. INTRODUCTION

This Post-Injection Site Care and Site Closure (PISC-SC) Plan outlines the planned activities that River Parish Sequestration, LLC (RPS), will perform to meet the requirements established in the U.S. Environmental Protection Agency (EPA) 40 CFR 146.93 guidelines. The PISC-SC documentation gives an overview of the computational modeling, sensitivity analysis, post-injection monitoring, and plans for site care and site closure. Described in the computational modeling is an overview of the methodology used to determine the areal extent of the $CO_2$ plume and pressure differential of the reservoir during the post-injection phase. The results of the modeling work presented in the Area of Review and Corrective Action Plan (**Attachment B**) are used to determine the required monitoring methods, site care, and timeframe that is needed to complete the post-injection phase in compliance with the EPA guidelines. At the cessation of injection, RPS will either submit an amended PISC-SC Plan or demonstrate to the UIC Program Director Office of Conservation Commissioner that no amendment is required based on monitoring data and updated modeling results.

The UIC Class VI Rules require that a demonstration of non-endangerment to underground sources of drinking water (USDWs) throughout the PISC-SC phase must be ensured and that USDWs are not at risk of endangerment for RPS to request site closure from the UIC Program Director and Office of Conservation Commissioner. [redacted]

[redacted]

[redacted]

## 3. POST-INJECTION PERIOD COMPUTATIONAL MODELING

Computational modeling of the RPS Project for the PISC-SC is detailed in the injection phase modeling efforts that was conducted for and described within **Attachment B**.

[redacted]

### 3.1. Pre- and Post-Injection Pressure Differential

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

### 3.2. Predicted Free-Phase $CO_2$ Plume and Associated Elevated Pressure Front at Site Closure

RPS modeled the $CO_2$ migration for 50 years during the post-injection period to evaluate its behavior after the cessation of injection. [redacted]

### 3.3. Alternative Timeframe Proposal

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

- [redacted]
- [redacted]
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[3] Ingram and Urai, "Top-seal leakage," 1999.
[4] Dobson and Houseworth, "*Inventory of shale formations,*" 2013.

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## 4.1. Continuous Monitoring

[redacted]

[redacted]

## 4.2. Above Confining Zone Monitoring

The RPS Project will monitor ground water quality and temperature and pressure variance in formations above the confining zone during the post-injection phase to meet the requirements of 40 CFR 146.93(b)(1). The purpose of above confining zone monitoring is to detect $CO_2$ migration out of the injection zone.

[redacted]

### 4.2.1. Monitoring Location and Frequency

[redacted]

[redacted]

[redacted]

## 4.3. [redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

## 4.4. Other Monitoring

[redacted]

### 4.5. Schedule for Submitting Post-Injection Monitoring Results

[redacted]

## 5. NON-ENDANGERMENT DEMONSTRATION CRITERIA

Prior to approval of the end of the alternative post-injection phase, RPS will submit a demonstration of non-endangerment of USDWs to the UIC Program Director, per 40 CFR 146.93(b)(2) and (3), and Office of Conservation Commissioner, per LAC 43.XVII.3633.A.2.c. [redacted]

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## 6. SITE CLOSURE PLAN

Site closure will commence at the end of the designated PISC-SC period. Site closure activities will include the decommissioning of surface equipment, plugging monitoring wells, restoring the site, and preparing and submitting site closure documentation. The UIC Program Director and Office of Conservation Commissioner will be notified at least 120 days in advance with a Notice of Intent for site closure. A revised site closure plan will be submitted if any changes from the original plan are found to be necessary. Once authorization is received, closure activities will be carried out. At this point, the UIC Program Director and Office of Conservation Commissioner will be issued a site closure report within 90 days of site closure, which will be retained as designated by the UIC Program Director for a 10-year period.

### 6.1. Equipment Decommissioning

[redacted]

[redacted]

[redacted]

[redacted]

## 6.2. Site Closure Well Plugging Program

[redacted]

[redacted]

Details of well plugging activities are given in **Attachment G**.

## 6.3. Site Restoration

At the end of the active injection phase, all surface areas that have been disturbed because of site operations will be restored and returned to as close as reasonably possible to predevelopment conditions. Gravel pads, access roads, and surface facilities will be removed, and the land will be reclaimed for agricultural or other pre-development utilization.

## 6.4. Site Closure Reporting

Site closure documentation will be submitted to the UIC Program Director within 90 days of site closure. [redacted]

- [redacted]
- [redacted]
- [redacted]

In association with site closure, a record of notation on the facility property deed will be added to provide any potential purchaser of the property the following information:

- Notification that the land was used for geologic sequestration.
- The name of the federal, state, and local agencies as well as the UIC Program Director and Office of Conservation Commissioner to which the survey plat was submitted.
- The volume of fluid injected, the injection zone or zones, and the period over which injection occurred.

Well plugging reports, PISC data and site closure report (including data and information used to develop the alternative PISC timeframe) and records will be retained for 10 years after closure has been completed in accordance with 40 CFR 146.91(f)(4). At the conclusion of this 10-year period, these records will be delivered to the EPA Region 6 UIC Branch for further storage in accordance with 40 CFR 146.93(h).

# Figures

# Figure Index

[redacted]

[redacted]

Ascension, Assumption, and Iberville Parishes
Louisiana

RIVER PARISH

| RPS Project | May 2023 | **Figure 3.1-1** |
|---|---|---|

Ascension, Assumption, and Iberville Parishes
Louisiana

RIVER PARISH

**Figure 3.1-2**

| RPS Project | May 2023 |
|---|---|

Ascension, Assumption, and Iberville Parishes
Louisiana

RIVER PARISH

**Figure 3.2-1**

| RPS Project | May 2023 |
|---|---|

Louisiana

RIVER PARISH

**Figure 3.2-2**

RPS Project

May 2023

[redacted]

| Louisiana | | |
|---|---|---|
| RIVER PARISH | | **Figure 3.3-1** |
| RPS Project | May 2023 | |

Ascension, Assumption, and Iberville Parishes
Louisiana

RIVER PARISH

**Figure 3.3-2**

| RPS Project | May 2023 |
|---|---|

Ascension, Assumption, and Iberville Parishes
Louisiana

RIVER PARISH

**Figure 3.3-3**

| RPS Project | May 2023 |
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Louisiana

RIVER PARISH

| RPS Project | May 2023 | Figure 3.3-4 |
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Ascension, Assumption, and Iberville Parishes
Louisiana

RIVER PARISH

| RPS Project | May 2023 | Figure 3.3-5 |
|---|---|---|