Administrative Completeness Notice of Deficiency

[Elysian/Orchard (R06-TX-0009)] - [Request #1]

Instructions: Populate the "Response" column with answers/responses to each comment/question below, then upload the completed responses to Field #3 in the "Information Requests" reporting module of the GSDT. If necessary, upload attachments or references in Field #4 of the module and/or update information within other GSDT modules. ***To allow reviewers to quickly locate and review changes/updates, clearly identify the location within the application where edits for each response were made (e.g., Site Characterization, Section 2.7.4, p. 53, updated paragraph 2).***

Item #	Associated Regulation(s)	Comment/Question	Response
General			
1	40 CFR 146.82(a)(21)	**Comment:** Please provide a digital copy of all references cited throughout the application. One folder/zip file containing references for all application sections/modules is acceptable. For books or similar hardcopy references, a scanned copy of the data or referenced section (e.g., a specific table, a single chapter) along with a copy of the cover and title page is sufficient.	
Project Information/Site Characterization			
2	40 CFR 146.82(a)(2)	**Background:** Figures 3-16 to 3-18 of Section 3-Area of Review file appear to have the most complete maps of the project area, including the AOR, injection wells, artificial penetrations (APs; includes both water and oil/gas wells), roads, surface water bodies, etc. However, the different AOR maps appear to be missing the location(s) of any subsurface cleanup sites (e.g., Superfund/CERCLA, hazardous waste/RCRA, brownfields, leaking underground storage tanks), mines, springs, etc., and no narrative discussion is included indicating that searches for such sites/features have been conducted and no sites/features located. **Comment:** Please update the narrative and map (if necessary) to include details of searches for subsurface cleanup sites, mines, springs, etc. and the results of those searches, including if no such sites/features were identified.	

3	40 CFR 146.82(a)(4), 40 CFR 146.84(c)(2), 40 CFR 146.82(a)(21)	**Background:** Table 3-7 of Section 3- Area of Review file contains information about water wells within the AOR, including total depth (TD), status, etc. However, no hardcopy (pdf) records were provided for any of the water wells. To properly evaluate the AOR and Corrective Action plans, EPA must independently assess each AP, including whether it penetrates the injection and/or confining zone(s). To do so, the application must contain hardcopy (pdf) records for all APs located within the AOR regardless of AP type. **Comment:** Please provide hardcopy (pdf) records for all APs within the AOR regardless of TD or status, including all water wells. Additionally, please provide well records for each AP in an individual pdf file (i.e., one AP's records per pdf) rather than combining records for multiple or all APs into one pdf file.	
Injection Well Construction			
4	40 CFR 146.82(a)(11), 40 CFR 146.88(e)	**Background:** Figure 4-1 of Section 4 Construction file contains a well schematic for the injection well, and the Testing and Monitoring plan (p. 13/41) states that "Continuous monitoring of the injected carbon dioxide stream pressure and temperature will be performed using digital pressure gauges installed in the CO2 flowline near the flowline-wellhead interface. An on-site SCADA system will be connected to the flowline, and a flowmeter will be installed on the injection well to measure the injected CO2 flow rate." **Comment:** While not required, EPA recommends that continuous recording and automatic shutoff devices also be illustrated on any well construction schematics.	