EMERGENCY AND REMEDIAL RESPONSE PLAN SUMMARY
40 CFR 146.94(a)

Brown Pelican CO_2 Sequestration Project

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1.0 Facility Information

Facility name: Brown Pelican CO_2 Sequestration Project
BRP CCS 1 Well

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Well location: [redacted]

The Emergency and Remedial Response Plan (ERRP) describes actions Oxy Low Carbon Ventures, LLC (OLCV), shall take to address movement of the injection fluid or formation fluid in a manner that may endanger an underground source of drinking water (USDW) during the construction, operation, or post-injection site care periods.

If OLCV obtains evidence that the injected CO_2 stream and/or associated pressure front may cause an endangerment to a USDW, OLCV must perform the following actions:

1. Initiate shutdown plan for the injection well.
2. Take all steps reasonably necessary to identify and characterize any release.
3. Notify the permitting agency (UIC Program Director) of the emergency event within 24 hours.
4. Implement applicable portions of the approved ERRP.

2.0 Overall Strategy and Approach for Emergency and Remedial Response

Resources in the vicinity of the Brown Pelican CO_2 Sequestration Project that may be affected as a result of an emergency event at the project site include USDWs, surface rivers and riverines, and nontidal, emergent wetlands. The Area of Review and Corrective Action Plan document addresses the USDWs within the project area.

Infrastructure in the vicinity of the Brown Pelican CO_2 Sequestration Project that that may be affected as a result of an emergency at the project site include local solar power generation operations on the surface projection of the Area of Review (AoR) and the direct air capture (DAC) facility adjacent to the AoR.

The events related to the Brown Pelican CO_2 Sequestrations Project that could potentially result in an emergency response are include over-pressured gas flow, movement of brine or CO2 outside the defined AoR, loss of mechanical integrity, monitoring equipment failure, seismic event, or natural disaster. OCLV will undertake emergency or remedial actions in response to these incidents. Response actions will depend on the severity of the event(s) triggering an emergency response and are described in detail in the project Emergency and Remedial Response Plan document of the permit.

Monitoring, control, and routine maintenance of the injection operations will be the responsibility of the Injection Operations Staff. Site personnel, project personnel, and local authorities will be relied upon to implement the ERRP. A site-specific emergency contact list will be developed and maintained during the life of the project.

Equipment needed in the event of an emergency and remedial response will vary, depending on the triggering emergency event. Response actions (cessation of injection, well shut-in, and evacuation) will generally not require specialized equipment to implement. Where specialized equipment (such as a drilling rig or logging equipment) is required, OLCV shall be responsible for its procurement.

OLCV will communicate to the public about any event that requires an emergency response to ensure that the public understands what happened and whether there are any environmental or safety implications.