UIC CLASS VI GEOLOGIC STORAGE OF CO_2 PERMIT APPLICATION

Midland CCS Hub

South Midland Facility

Upton County, Texas

Section 12: Environmental Justice

Prepared for:

EPA Region 6

Underground Injection Control Section

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Updated 18 October 2024

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12.0 ENVIRONMENTAL JUSTICE

The EPA Class VI requirements have been developed to protect underground sources of drinking water (USDW). These requirements aim to minimize potential health risks, especially risks to populations in or near the delineated area of review (AoR) for the injection well or in the anticipated direction of the carbon dioxide plume and pressure front. The Regional EPA UIC Directors have a role in protecting public health and should consider the risks of a proposed Class VI injection well within their jurisdiction to identify and address any environmental impacts on minority and low-income populations (i.e., Environmental Justice (EJ) screening)[1].

Milestone has prepared this EJ Screening Report (the Report) to review any potential impacts to EJ within the carbon dioxide plume area/project AoR. Based on the current modeling efforts associated with this application, the plume area is anticipated to be less than 3-miles in diameter. Milestone, with guidance from EPA, Region 6 UIC department, selected a 5-mile radius around the proposed Well for EJ screening. Data supporting Milestone's EJ review was developed using the EPA's EJScreen tool (https://ejscreen.epa.gov/mapper/).

Consideration and guidance, as per EPA memo dated 17 August 2023[1], was used to develop this permit application. Milestone and EPA Regions will work collaboratively and proactively with State of Texas, tribal, and local partners to facilitate consideration and application of this guidance in our UIC permitting actions.

12.1 2020 Census Population and Race Data

Upton County, Texas is the 222nd most populous county in Texas with a total population of 3,308 people (Source: US 2020 Census) and 1,363 total households. It is a rural county of Texas with 91 businesses and an employment rate of 55.2%. The County Seat of Upton County is Rankin, Tx with a total population of 780. The Median Household Income of Upton County is $55,284 which is lower than the national median household income of $74,580 (Source: 2022 CPS ASEC Report, US Census Bureau).

Table **12-1** shows the racial profile of Upton County and the 5-mile radius around the proposed Injection well location. Upton County is 56% white, a majority of which are of Hispanic descent. The next largest racial group is "two or more races" at approximately 30%, followed by "some other race alone" at approximately 12%, which means the person identifies as a race not listed on the census.

Table 12-1: 2020 Census P1 Race Data for Upton County, Texas and 5-Mile Radius of Injection Well

Population by Race	Upton County		5 Mile Radius	
Total Population	3,308	100%	82	100.0%
White	1,849	55.9%	58	70.7%
Two or More Races	987	29.8%	8	9.8%
Some Other Race Alone	380	11.5%	14	17.1%
African American	74	2.2%	0	0.0%
American Indian or Alaskan Native	13	0.4%	1	1.2%
Asian	5	0.2%	1	1.2%
Hispanic and Latino				
Hispanic	1,849	55.9%	36	43.9%
Non-Hispanic	1,435	43.4%	46	56.1%

[1] https://www.epa.gov/system/files/documents/2023-08/Memo%20and%20EJ%20Guidance%20for%20UIC%20Class%20VI_August%202023.pdf

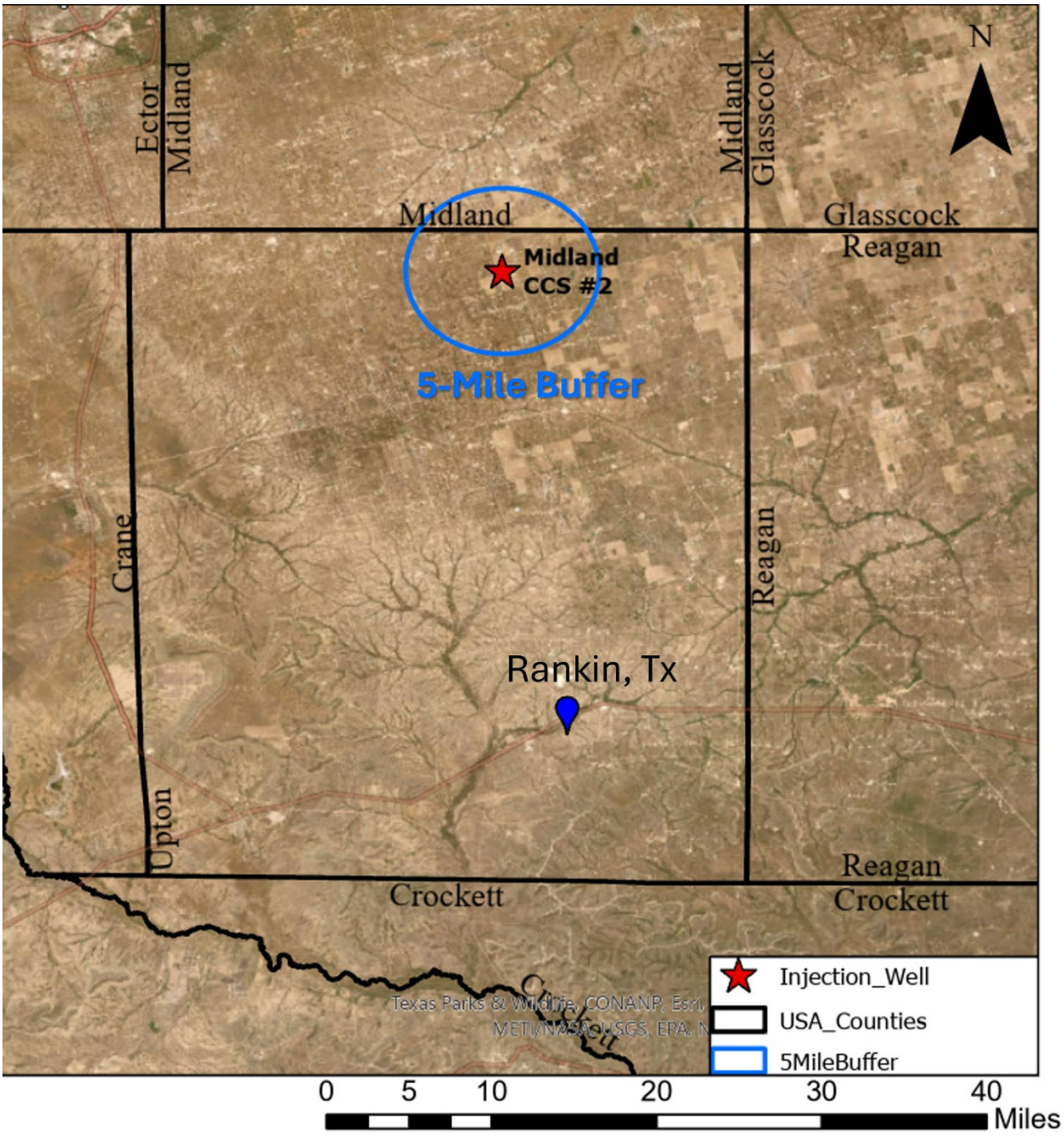

Figure 12-1: Map of Area with 5-mile Radius Buffer Shown in Relation to Rankin, Tx

12.2 Environmental Justice Screen Results

12.2.1 EJ Screen Census (2020) Summary and American Community Survey Report(s) (2018 – 2022)

The EJ Screen (2018-2022) Summary Report indicated the population within the 5-mile radius of the proposed Well was 82. Of this total number, 38 people (46%) identified as persons of color. The Census Report identified that 83% of the area was over the age of 18 years old and 74% of the households were owned versus 26% of households rented. A copy of this Census Report may be viewed in **Figure 12-2**. The ACS Report indicated that less than 0.04 sq. mi. of the AoR was considered water area (accounting for 0%) and the land area was 77.96 sq. mi. (100%).

The ACS Report indicated a majority of the population (roughly 72%) had an education background between high school (non-diploma) and some college, no degree). 19% had a 9-12th grade education and 8% had an education level below this. Additionally, roughly 91% of the population was noted to be able to speak English. Of these, 63% speak only English and 28% speak English "very well." Lastly, the household income within the AoR was identified 70% of households as earning $50,000 +. A copy of the ACS Report can be found in **Figure 12-2** to **Figure 12-4.**

12.2.2 EJScreen Report

The EJScreen Report includes an evaluation of twelve (12) EJ Indexes that combine environmental and socioeconomic information. The results of the screening report is a comparison of the individuals within the screening area to both State (Texas) and U.S. percentiles. A listing of the EJ Indexes is as follows:

1) Particulate Matter 2.5,
2) Ozone,
3) Nitrogen Dioxide,
4) Diesel Particulate Matter,
5) Toxic Releases to Air,
6) Traffic Proximity,
7) Lead Paint,
8) Superfund Proximity,
9) RMP Facility Proximity,
10) Hazardous Waste Proximity,
11) Underground Storage Tanks (UST) Proximity,
12) Wastewater Discharge, and
13) Drink Water Non-Compliance.

The results indicate residents within the 5-mile radius were exposed to a greater risk of Ozone (in parts-per-billion, ppb), Diesel Particulate Matter (in micro-grams per meters cubed, µg/m^3), and Air Toxics Cancer Risk (lifetime risk per million). The remaining risks included Lead Paint (% of pre-1960 housing) and Superfund Proximity (site count/kilometer distance). There were no Superfunds or Hazardous Waste TSDFs within the 5-mile radius. The remaining indexes were shown to be lower than the State and U.S. percentiles. A copy of the EJScreen Community Report is included in **Figures 12-5** to **Figure 12-8**.

12.3 Interpretation of Results

In reviewing the pollution risk sources from the EJScreen Report, the development and operation of the proposed Well will benefit the immediate population by sequestering carbon dioxide that would otherwise be emitted. This could improve the index results for Particulate Matter 2.5, Ozone, Diesel Particulate Matter, Air Toxics Cancer Risk, and Air Toxics Respiratory HI. The remaining comparative indexes would not be impacted as a Class VI well operation would not increase any of those indexes.

EPA United States Environmental Protection Agency

EJSCREEN ACS Summary Report

Location: User-specified point center at 31.615788, -101.990005
Ring (buffer): 5-miles radius
Description: Midland CCS #2

Summary of ACS Estimates	2018 - 2022
Population	82
Population Density (per sq. mile)	1
People of Color Population	38
% People of Color Population	46%
Households	36
Housing Units	41
Housing Units Built Before 1950	1
Per Capita Income	32,017
Land Area (sq. miles) (Source: SF1)	79.61
% Land Area	100%
Water Area (sq. miles) (Source: SF1)	0.04
% Water Area	0%

	2018 - 2022 ACS Estimates	Percent	MOE (±)
Population by Race			
Total	82	100%	782
Population Reporting One Race	74	90%	1,185
White	58	71%	853
Black	0	0%	15
American Indian	1	1%	21
Asian	1	1%	56
Pacific Islander	0	0%	15
Some Other Race	14	17%	225
Population Reporting Two or More Races	8	10%	489
Total Hispanic Population	36	44%	773
Total Non-Hispanic Population	46		
White Alone	44	54%	579
Black Alone	0	0%	15
American Indian Alone	1	1%	21
Non-Hispanic Asian Alone	1	1%	56
Pacific Islander Alone	0	0%	15
Other Race Alone	0	0%	15
Two or More Races Alone	0	0%	15
Population by Sex			
Male	43	52%	417
Female	39	48%	468
Population by Age			
Age 0-4	4	5%	241
Age 0-17	23	28%	418
Age 18+	60	72%	484
Age 65+	9	11%	136

Data Note: Detail may not sum to totals due to rounding. Hispanic population can be of any race.
N/A meansnot available. **Source:** U.S. Census Bureau, American Community Survey (ACS) 2018 - 2022 .

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Figure 12-2: American Community Survey Report(s) (ACS) (2018 – 2022), Page 1

EJSCREEN ACS Summary Report

Location: User-specified point center at 31.615788, -101.990005
Ring (buffer): 5-miles radius
Description: Midland CCS #2

	2018 - 2022 ACS Estimates	Percent	MOE (±)
Population 25+ by Educational Attainment			
Total	53	100%	546
Less than 9th Grade	5	8%	150
9th - 12th Grade, No Diploma	10	19%	259
High School Graduate	16	29%	312
Some College, No Degree	11	21%	154
Associate Degree	5	9%	126
Bachelor's Degree or more	7	13%	157
Population Age 5+ Years by Ability to Speak English			
Total	78	100%	738
Speak only English	49	63%	543
Non-English at Home[1+2+3+4]	29	37%	704
[1]Speak English "very well"	22	28%	696
[2]Speak English "well"	3	4%	141
[3]Speak English "not well"	4	5%	153
[4]Speak English "not at all"	0	0%	52
[3+4]Speak English "less than well"	4	5%	162
[2+3+4]Speak English "less than very well"	7	9%	201
Limited English Speaking Households*			
Total	2	100%	124
Speak Spanish	2	100%	121
Speak Other Indo-European Languages	0	0%	15
Speak Asian-Pacific Island Languages	0	0%	15
Speak Other Languages	0	0%	15
Households by Household Income			
Household Income Base	36	100%	295
< $15,000	4	11%	97
$15,000 - $25,000	2	7%	153
$25,000 - $50,000	4	12%	123
$50,000 - $75,000	6	16%	136
$75,000 +	19	54%	280
Occupied Housing Units by Tenure			
Total	36	100%	295
Owner Occupied	26	74%	184
Renter Occupied	9	26%	234
Employed Population Age 16+ Years			
Total	63	100%	596
In Labor Force	40	64%	534
Civilian Unemployed in Labor Force	1	3%	33
Not In Labor Force	23	36%	226

Data Note: Detail may not sum to totals due to rounding. Hispanic population can be of any race.
N/A means not available. **Source:** U.S. Census Bureau, American Community Survey (ACS)
*Households in which no one 14 and over speaks English "very well" or speaks English only.

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Figure 12-3: ACS (2018-2022) Report Page 2

EPA United States Environmental Protection Agency

EJSCREEN ACS Summary Report

Location: User-specified point center at 31.615788, -101.990005
Ring (buffer): 5-miles radius
Description: Midland CCS #2

	2018 - 2022 ACS Estimates	Percent	MOE (±)
Population by Language Spoken at Home*			
Total (persons age 5 and above)	N/A	N/A	N/A
English	N/A	N/A	N/A
Spanish	N/A	N/A	N/A
French, Haitian, or Cajun	N/A	N/A	N/A
German or other West Germanic	N/A	N/A	N/A
Russian, Polish, or Other Slavic	N/A	N/A	N/A
Other Indo-European	N/A	N/A	N/A
Korean	N/A	N/A	N/A
Chinese (including Mandarin, Cantonese)	N/A	N/A	N/A
Vietnamese	N/A	N/A	N/A
Tagalog (including Filipino)	N/A	N/A	N/A
Other Asian and Pacific Island	N/A	N/A	N/A
Arabic	N/A	N/A	N/A
Other and Unspecified	N/A	N/A	N/A
Total Non-English	N/A	N/A	N/A

Data Note: Detail may not sum to totals due to rounding. Hispanic popultion can be of any race.
N/A meansnot available. **Source:** U.S. Census Bureau, American Community Survey (ACS) 2018 - 2022.
*Population by Language Spoken at Home is available at the census tract summary level and up.

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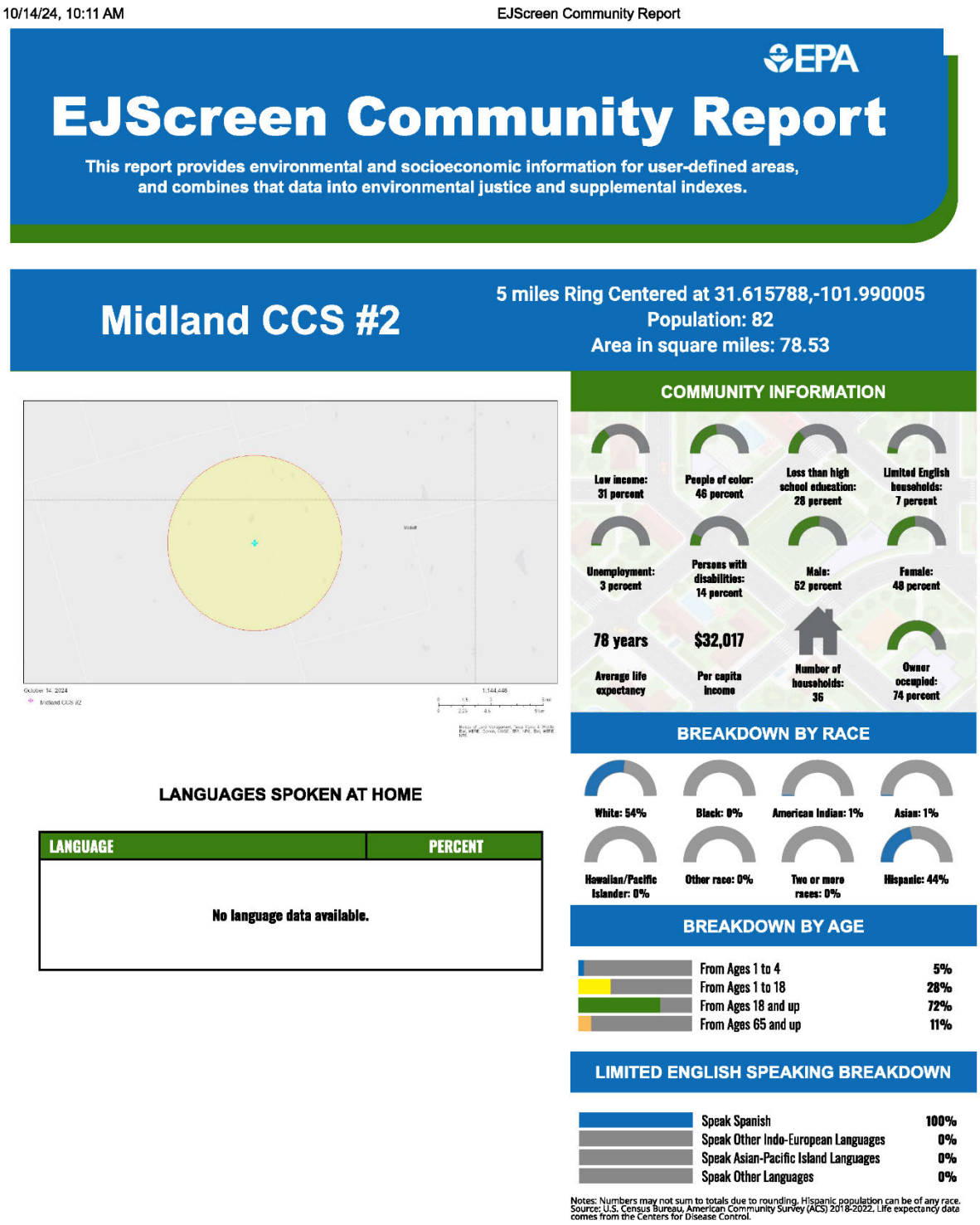
Figure 12-4: ACS (2018-2022) Report Page 3



10/14/24, 10:11 AM EJScreen Community Report

EPA

EJScreen Community Report

This report provides environmental and socioeconomic information for user-defined areas, and combines that data into environmental justice and supplemental indexes.

Midland CCS #2

5 miles Ring Centered at 31.615788,-101.990005
Population: 82
Area in square miles: 78.53

COMMUNITY INFORMATION

Low income: 31 percent
People of color: 46 percent
Less than high school education: 28 percent
Limited English households: 7 percent
Unemployment: 3 percent
Persons with disabilities: 14 percent
Male: 52 percent
Female: 48 percent
78 years
Average life expectancy
$32,017
Per capita income
Number of households: 36
Owner occupied: 74 percent

BREAKDOWN BY RACE

White: 54%
Black: 0%
American Indian: 1%
Asian: 1%
Hawaiian/Pacific Islander: 0%
Other race: 0%
Two or more races: 0%
Hispanic: 44%

BREAKDOWN BY AGE

From Ages 1 to 4	5%
From Ages 1 to 18	28%
From Ages 18 and up	72%
From Ages 65 and up	11%

LIMITED ENGLISH SPEAKING BREAKDOWN

Speak Spanish	100%
Speak Other Indo-European Languages	0%
Speak Asian-Pacific Island Languages	0%
Speak Other Languages	0%

Notes: Numbers may not sum to totals due to rounding. Hispanic population can be of any race.
Source: U.S. Census Bureau, American Community Survey (ACS) 2018-2022. Life expectancy data comes from the Centers for Disease Control.

LANGUAGES SPOKEN AT HOME

LANGUAGE	PERCENT
No language data available.	

Report for 5 miles Ring Centered at 31.615788,-101.990005
Report produced October 14, 2024 using EJScreen Version 2.3

https://ejscreen.epa.gov/mapper/ejscreen_SOE.aspx 1/4

Figure 12-5: EJ Screen Community Report, p1

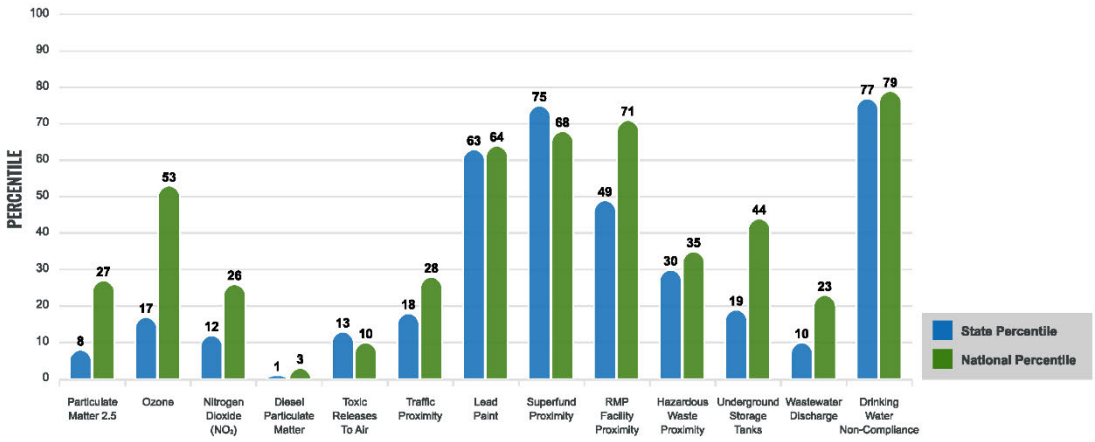
Environmental Justice & Supplemental Indexes

The environmental justice and supplemental indexes are a combination of environmental and socioeconomic information. There are thirteen EJ indexes and supplemental indexes in EJScreen reflecting the 13 environmental indicators. The indexes for a selected area are compared to those for all other locations in the state or nation. For more information and calculation details on the EJ and supplemental indexes, please visit the EJScreen website.

EJ INDEXES

The EJ indexes help users screen for potential EJ concerns. To do this, the EJ index combines data on low income and people of color populations with a single environmental indicator.

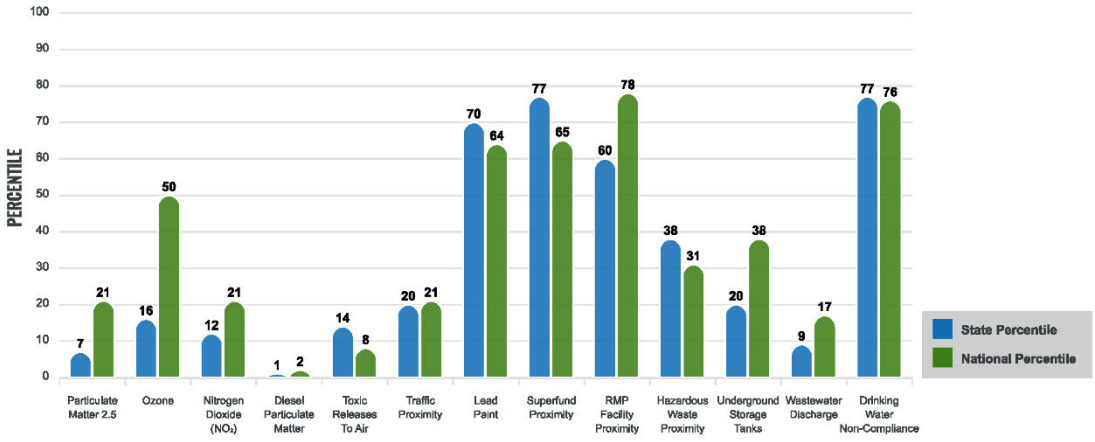
EJ INDEXES FOR THE SELECTED LOCATION



SUPPLEMENTAL INDEXES

The supplemental indexes offer a different perspective on community-level vulnerability. They combine data on percent low income, percent persons with disabilities, percent less than high school education, percent limited English speaking, and percent low life expectancy with a single environmental indicator.

SUPPLEMENTAL INDEXES FOR THE SELECTED LOCATION



Report for 5 miles Ring Centered at 31.615788,-101.990005
Report produced October 14, 2024 using EJScreen Version 2.3

Figure 12-6: EJ Screen Community Report, p2

10/14/24, 10:11 AM EJScreen Community Report

EJScreen Environmental and Socioeconomic Indicators Data

SELECTED VARIABLES	VALUE	STATE AVERAGE	PERCENTILE IN STATE	USA AVERAGE	PERCENTILE IN USA
ENVIRONMENTAL BURDEN INDICATORS					
Particulate Matter 2.5 ($\mu g/m^3$)	6.77	8.86	5	8.45	14
Ozone (ppb)	57.3	63	12	61.8	34
Nitrogen Dioxide (NO_2) (ppbv)	3.8	9.5	7	7.8	12
Diesel Particulate Matter ($\mu g/m^3$)	0.0243	0.151	0	0.191	1
Toxic Releases to Air (toxicity-weighted concentration)	4.3	12,000	10	4,600	6
Traffic Proximity (daily traffic count/distance to road)	110,000	1,000,000	16	1,700,000	18
Lead Paint (% Pre-1960 Housing)	0.3	0.16	79	0.3	59
Superfund Proximity (site count/km distance)	0.15	0.11	81	0.39	66
RMP Facility Proximity (facility count/km distance)	0.61	0.95	47	0.57	68
Hazardous Waste Proximity (facility count/km distance)	0.38	1.5	34	3.5	30
Underground Storage Tanks (count/km^2)	0.019	2.3	14	3.6	28
Wastewater Discharge (toxicity-weighted concentration/m distance)	0.085	3800	8	700000	14
Drinking Water Non-Compliance (points)	1.6	2.3	89	2.2	84
SOCIOECONOMIC INDICATORS					
Demographic Index USA	1.45	N/A	N/A	1.34	61
Supplemental Demographic Index USA	1.95	N/A	N/A	1.64	71
Demographic Index State	1.45	1.72	42	N/A	N/A
Supplemental Demographic Index State	1.61	1.49	60	N/A	N/A
People of Color	46%	58%	37	40%	63
Low Income	31%	34%	49	30%	57
Unemployment Rate	3%	5%	49	6%	47
Limited English Speaking Households	5%	8%	62	5%	76
Less Than High School Education	28%	16%	79	11%	90
Under Age 5	5%	6%	50	5%	57
Over Age 64	11%	15%	41	18%	27

*Diesel particulate matter index is from the EPA's Air Toxics Data Update, which is the Agency's ongoing, comprehensive evaluation of air toxics in the United States. This effort aims to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that the air toxics data presented here provide broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the Air Toxics Data Update can be found at: https://www.epa.gov/haps/air-toxics-data-update.

Sites reporting to EPA within defined area:

Superfund	0
Hazardous Waste, Treatment, Storage, and Disposal Facilities	0
Water Dischargers	5
Air Pollution	3
Brownfields	0
Toxic Release Inventory	1

Other community features within defined area:

Schools	0
Hospitals	0
Places of Worship	0

Other environmental data:

Air Non-attainment	No
Impaired Waters	No

Selected location contains American Indian Reservation Lands*	No
Selected location contains a "Justice40 (CEJST)" disadvantaged community	No
Selected location contains an EPA IRA disadvantaged community	Yes

Report for 5 miles Ring Centered at 31.615788,-101.990005
Report produced October 14, 2024 using EJScreen Version 2.3

https://ejscreen.epa.gov/mapper/ejscreen_SOE.aspx 3/4

Figure 12-7: EJ Screen Community Report, p3

10/14/24, 10:11 AM EJScreen Community Report

EJScreen Environmental and Socioeconomic Indicators Data

HEALTH INDICATORS					
INDICATOR	VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Low Life Expectancy	20%	20%	50	20%	55
Heart Disease	5.9	5.4	61	5.8	56
Asthma	9.5	9.8	38	10.3	27
Cancer	6	5.5	63	6.4	40
Persons with Disabilities	13.8%	12.6%	63	13.7%	56

CLIMATE INDICATORS					
INDICATOR	VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Flood Risk	11%	10%	77	12%	69
Wildfire Risk	35%	30%	65	14%	84

CRITICAL SERVICE GAPS					
INDICATOR	VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Broadband Internet	17%	13%	68	13%	72
Lack of Health Insurance	12%	18%	30	9%	74
Housing Burden	No	N/A	N/A	N/A	N/A
Transportation Access Burden	Yes	N/A	N/A	N/A	N/A
Food Desert	No	N/A	N/A	N/A	N/A

Report for 5 miles Ring Centered at 31.615788,-101.990005
Report produced October 14, 2024 using EJScreen Version 2.3

www.epa.gov/ejscreen

https://ejscreen.epa.gov/mapper/ejscreen_SOE.aspx 4/4

Figure 12-8: EJ Screen Community Report, p4

12.4 EJ Memo Responses

Pursuant to the EPA Memorandum on Environmental Justice Guidance for UIC Class VI Permitting and Primacy dated August 17th, 2023, Milestone has prepared the following responses to the items therein.

Milestone has publicly disclosed its sustainability efforts and related performance since 2020. All information provided below is available on our website. https://www.milestone-es.com/Sustainability/

Milestones' 2023 sustainability report can be found on link: Sustainability Report

Milestone's sustainability program has components to ensure the company identifies and comprehensively manages potential environmental and social risks and concerns.

12.4.1 Environmental and Social Risk Management

Milestone's approach to risk management was evaluated in 2022 to ensure it is disciplined, systematic, comprehensive, and aligned with international sustainability reporting frameworks. We conducted a sustainability materiality and risk assessment exercise to identify the most material issues to our industry, and to clearly evaluate and rank the risks these issues pose to our value-creation efforts. We also align all issues and risks to applicable stakeholders. As part of this exercise, we identify relevant business opportunities to further mitigate risks posed to the company. Identifying and prioritizing our risks and opportunities enables Milestone to drive informed business decisions about resource allocation, align our organizational priorities, and monitor emerging issues that may shape our future risk exposure. It also facilitates the selection of the most impactful sustainability metrics to measure and manage our performance. This process will allow us to continue analyzing and identifying any emerging risks regarding Environmental Justice in our future projects (**Fig. 12-9**).

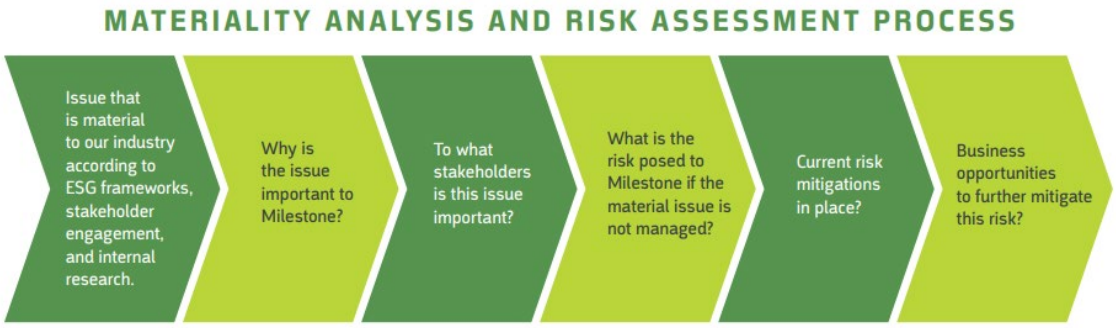


Figure 12-9: Environmental and Social Risk Management Process

12.4.2 Stakeholder Engagement

We recognize the influence our operations can have on the environment and communities, and we understand the importance of actively considering issues important to our stakeholders in our decision-making processes. Milestone defined an engagement process to guide it in its dialogue with stakeholders on important issues. This process centers our engagement efforts on a series of principles while following six steps to foster action-oriented and mutually beneficial outcomes. This commitment to stakeholder engagement complements Milestone's dedication to sustainable practices and minimizing its environmental footprint. This process proactively considers the needs of our stakeholders to foster connection, trust, confidence, and alignment with our organization's operations. As our business grows, continuing to meet the needs of our stakeholder groups will be an essential part of our strategic planning.

Figure 12-10 illustrates Milestone's Stakeholder Engagement Process and the 6 Principles that guide it. 1) Prepare, 2) Plan, 3) Design, 4) Engage, 5) Evaluate, 6) Apply.

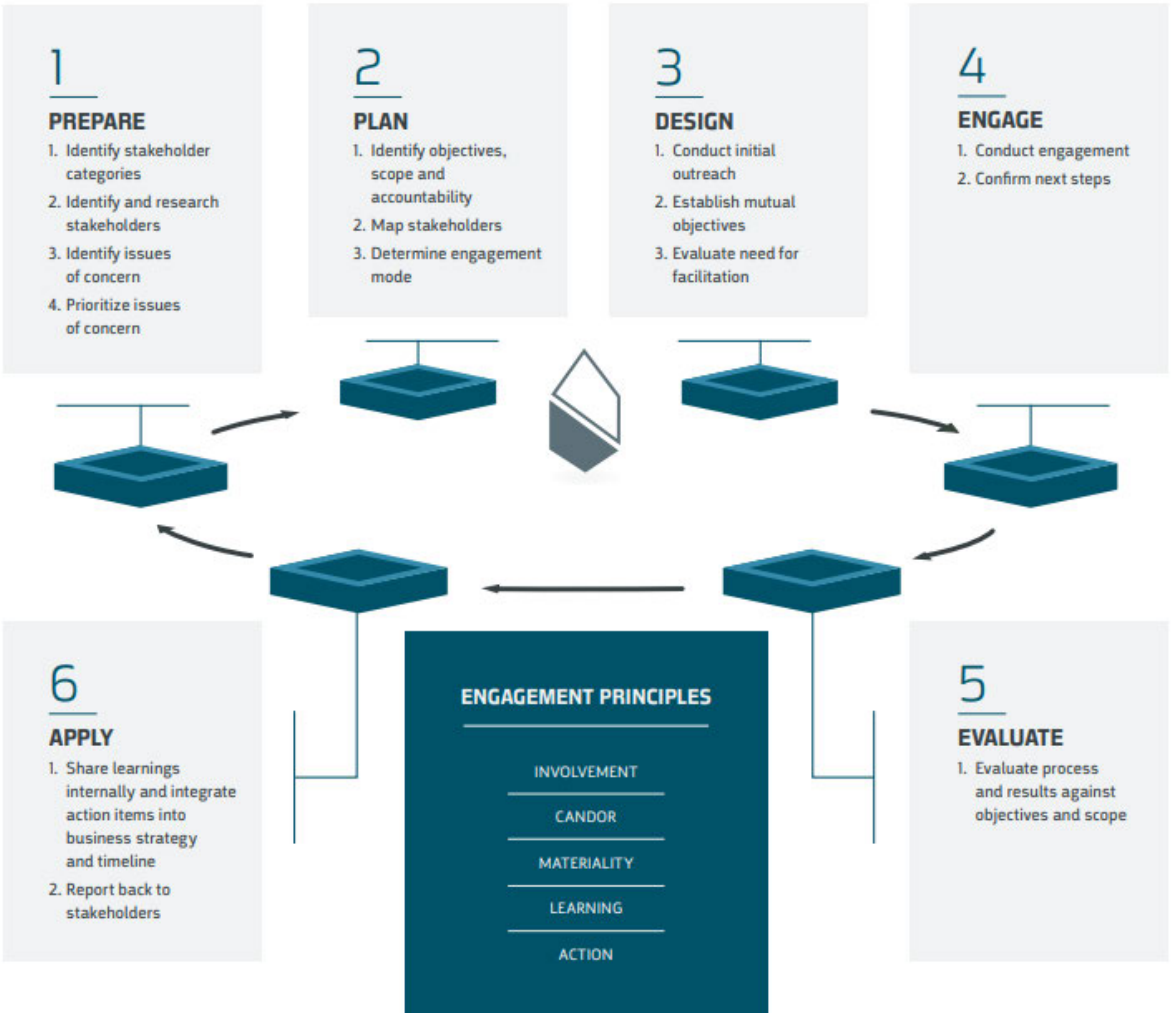


Figure 12-10: Stakeholder Engagement Process

12.4.3 Identify Communities with Potential EJ Concerns

Milestone has reviewed census data, EJSCREEN data, interviewed residents/landowners and contacted local community leaders regarding the proposed project. Milestone has met with community leaders such as the Mayor of Midland, State Senators, and adjacent County Commissioners to describe the project. The EJScreen data indicates the AoR, and 5 miles around it, is sparsely populated and the local population is predominantly White. Milestone's process described above to identify and manage environmental and social risk will allow the company to proactively identify communities potentially adversely, and disproportionately affected by human health, environmental, climate-related, and/or other cumulative harms or risks – that is, affected communities with potential EJ concerns – to help ensure proactive community engagement and promote the just treatment and meaningful involvement of the affected community in UIC permitting actions.

12.4.4 Enhance Public Involvement

Milestone is committed to implementing an inclusive public participation process to enhance community engagement. Milestone's efforts to engage with key stakeholders in the AoR began in 2022 and will continue to involve local leaders, residents, landowners, mineral owners, community and industry organizations, state/local government and offset oil and gas operators as the project continues to develop.

12.4.5 Enhance Transparency Throughout the Permitting Process

Milestone is committed to a transparent permitting process with the EPA and Texas State Regulators such as the Railroad Commission of Texas (RRC) and Texas Commission on Environmental Quality (TCEQ). Milestone will be proactive in posting compliance, monitoring test results, records, and reports required by the permit in a publicly available, understandable, and readily accessible format for the community. [redacted]

12.4.6 Minimize Adverse Effects to USDWs and Communities We Serve

Milestone will partner with EPA and RRC regulators as well as community leaders, emergency first responders, hospitals, emergency management districts and other local entities to proactively work to prevent any adverse impacts to USDWs from all activities throughout the life of the project.

12.5 Conclusions

Milestone utilized the data from the EPA's EJScreen tool, Census Bureau, interviews with local landowners and residents plus other methods to develop this Report.

The EJScreen and Census Bureau report are consistent, data-based screening tools. The tools don't raise any EJ-related issues of concern given the sparsely populated region surrounding the AoR.

Though the Interpretation of Results indicate the development and operation of a Class VI well would have benefits to the immediate population by sequestering carbon dioxide that would otherwise be emitted and improving air quality. Milestone understands that additional efforts may be undertaken to ensure the surrounding community is not adversely affected.

In addition, the development of this Project may provide socio-economic benefits to the surrounding area(s) such as employment and apprenticeship programs during the construction phase, procurement of local goods and/or services, and improving infrastructure and workforce skills.

Milestone is committed to ensuring and supporting an ongoing dialogue between the community and Milestone. Furthermore, the development of an MRV Plan (Subpart RR Monitoring, Reporting, and Verification Plan – Greenhouse Gas Reporting Program, 40 CFR Part 98), will help ensure the safety and continuous review of activities within the Project.