

Plan revision number: Revision 2
Plan revision date: December 2024

APPENDIX A

SUMMARY OF REQUIREMENTS CLASS VI OPERATING AND REPORTING CONDITIONS

Jasper County Storage Facility

1 FACILITY INFORMATION

Facility Name: Jasper County Storage Facility

Facility Contact: Claimed as PBI
501 Westlake Park Blvd., Houston, Texas 77079
Claimed as PBI

Well Location: Jasper County, Texas

Claimed as PBI

2 INTRODUCTION

On October 27, 2023, BP Carbon Solutions LLC (BP) submitted this section of the Class VI application for the Jasper County Storage Facility (Site), and the application was deemed administratively complete on November 22, 2023. In this Revision 2, the Summary of Requirements Class VI Operating and Reporting Conditions has been updated to reflect changes to the proposed injection well operating conditions. Additionally, the AoR model has been updated to incorporate additional appraisal and offset well data, providing an enhanced understanding of the subsurface. These changes are expected to reduce project risk by moving away from known faults within the AoR, minimizing the AoR extent, optimizing injection well operations, and reducing interactions with legacy wells.

BP intends to sequester carbon dioxide (CO₂) Claimed as PBI

is estimated to be stored at the Site during the injection period. The calculations and supporting documentation for injection rates and volume are provided in **Appendix B** (Area of Review and Corrective Action Plan).

This Summary of Requirements Plan describes the operating conditions, shutdown procedures, and reporting that BP will perform to meet the requirements of 40 CFR Part 146 for the Site.

The Site will include Claimed as PBI

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Claimed as PBI and infrastructure related to construction, operations, and post-injection site care and closure.

3 INJECTION WELL OPERATING CONDITIONS

Table 1 (Proposed Operational Parameters and Conditions) provides the proposed operational parameters and conditions of the injection wells in accordance with 40 CFR 146.82(a)(7)(i)-(ii).



The maximum injection pressure was determined to prevent confining formation fracturing within the Site in accordance with 40 CFR 146.88(a) and is discussed in **Appendix B** (Area of Review and Corrective Action Plan), **Section 3.9** (Fracture Pressure and Fracture Gradient).

4 ROUTINE SHUTDOWN PROCEDURE

Routine shutdowns related to routine conditions (e.g., well workovers) are completed via reducing the CO₂ injection rate over a period of time to maintain safe isolation and integrity of the well and protect the environment, human health, and safety. A summary of the procedures to immediately shut in the well is described in **Appendix H** (Emergency and Remedial Response Plan).

5 REPORTING REQUIREMENTS

Specific testing and monitoring procedures are outlined in **Appendix E** (Testing and Monitoring Plan). **Table 2** (Class VI Injection Well Reporting Requirements) and **Table 3** (Class VI Project Reporting Requirements) show the injection well and project reporting requirements for the injection phase of the project, respectively.

Table 2. Class VI Injection Well Reporting Requirements

| Activity | Reporting Requirements |
|--|--------------------------------------|
| CO ₂ stream characterization | Semi-annually |
| Injection pressure, injection rate, injection volume, pressure on the annulus, and annulus fluid level | Semi-annually |
| Corrosion monitoring | Semi-annually |
| External MITs, well workover | Within 30 days of completion of test |
| Evidence of potential USDW endangerment, permit noncompliance, injection system malfunction, shut-off triggering, failure to maintain mechanical integrity | Within 24 hours of event |
| Planned well workover, stimulation activities, or other tests | 30 days in advance of event |
| Pressure fall-off testing | In the next semi-annual report |

Notes:

CO₂ – carbon dioxide; MIT – mechanical integrity test; USDW – underground sources of drinking water

Table 3. Class VI Project Reporting Requirements

| Activity | Reporting Requirements |
|-----------------------------------|--------------------------------------|
| Groundwater quality monitoring | Semi-annually |
| Plume and pressure front tracking | In the next semi-annual report |
| Monitoring well MITs | Within 30 days of completion of test |
| Financial responsibility updates | Within 60 days of update |

Notes:

MIT – mechanical integrity test