



Underground Injection Control – Class VI Permit Application for Rose CCS Project Injection  
Wells No. 01, No. 02, and No. 03

## SECTION 8 – EMERGENCY AND REMEDIAL RESPONSE PLAN

Rose Carbon Capture and Storage Project

**Claimed as PBI**

ExxonMobil Low Carbon Solutions Onshore Storage LLC

February 2024

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Class VI Permit Application for Rose CCS Project Injection Wells No. 01, No. 02, and No. 03

## SECTION 8 – EMERGENCY AND REMEDIAL RESPONSE PLAN

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Appendix G-1: FEMA Flood Zone Hazards Map for Rose Project CCS Injection Wells No. 01 and 02

Appendix G-2: FEMA Flood Zone Hazards Map for Rose Project CCS Injection Well No. 03

## 8.0 Emergency and Remedial Response Plan

This Emergency and Remedial Response Plan (ERRP) was developed in compliance with the requirements of Title 40 Code of Federal Regulations (CFR) 146.94 to develop and maintain an EERP that describes actions to be taken to address events that may cause endangerment to an underground sources of drinking water (USDWs) during the construction, operation, and post-injection site care periods of the Rose Carbon Capture and Storage (CCS) Project (Project). Under 40 CFR 146.90(g), the actions described in the EERP are to be implemented immediately to address a rare event where the movement of the injection fluid or formation fluid endangers USDW. ExxonMobil prepared this EERP to provide both the scope of actions to be taken and the schedule under which the actions would be implemented.

ExxonMobil Low Carbon Solutions Onshore Storage LLC (ExxonMobil) is undertaking the Project in **Claimed as PBI**, to sequester between **Claimed as PBI** **Claimed as PBI**. The EERP was developed for injection of CO<sub>2</sub> into Rose CCS Project Injection Wells No. 01, No. 02, and No. 03, which will sequester a total of approximately **Claimed as PBI**.

ExxonMobil has already created a number of engineering design and planning safeguards to reduce the potential for a rare emergency and remedial response event from occurring in the first place. These steps are based on ExxonMobil's global experience and expertise with risk management for rare events in site selection, well drilling and completion, and reservoir operations. The risk management approach is evident in the preparation of sections of this Underground Injection Control Class VI Permit Application (Application). Section 2 – Site Characterization describes how the geologic setting is favorable to safe CO<sub>2</sub> sequestration because of the favorable injection zone and confining zone characteristics that exist at the site. Section 3 – Area of Review and Corrective Action describes how the CO<sub>2</sub> plume and pressure front are predicted to be confined to the injection zone and how pressure will be managed to reduce the potential for leakage to USDWs. The few artificial penetrations through the confining zones will be re-abandoned to safeguard USDWs within the Area of Review (AoR). Section 4 – Well Construction Plan and Operating Conditions describes how the well design process and operating controls for mechanical integrity and pressure control to maintain a high level of risk reduction for the Project. Lastly, Section 5 – Testing and Monitoring Plan, provides the data acquisition plan for tracking the CO<sub>2</sub> plume and brine pressure front to assess compliance with control and containment requirements.

The purpose of this section is to provide the elements of the risk management process undertaken for the Project so that the underground injection control (UIC) Program Director can ultimately approve the remedial and response actions in advance. Once approved, ExxonMobil will be prepared to implement the actions necessary to facilitate and expedite response efforts for the rare occurrence of a leak from the injection zone. The EERP will apply over the life of the Project, including throughout the post-injection site care period [40 CFR 146.94(a)].

## **8.1 Objectives**

The ERRP is a risk-based document that identifies a set of hypothetical potential risk scenarios that could create an endangerment to USDWs and the actions to be taken to mitigate such risk. The objectives of the ERRP are aligned with the requirements of 40 CFR 146.94, which include:

- Identify potential risk scenarios and adverse events that could impact USDW in the AoR. The assessment focuses on those events that were found to have a combined probability and consequence that makes them more likely to have an impact than other factors.
- Provide a description of the response actions necessary to reduce the potential consequences to USDWs. For each scenario considered to be of material concern, describe the anticipated severity of the event, the phase during which the event could occur (i.e., construction, injection and/or post-injection phases), the proposed avoidance measures, what methods will detect the loss of containment or control, the response actions, notification requirements, and personnel and equipment that would be employed to mitigate the risk; and
- Provide contact information for response personnel, a communications plan, and a description of staff training and exercise procedures.

## **8.2 Overview of Risk Management Process**

ExxonMobil took the findings from the site characterization, AoR, and corrective action sections of the Application and identified hypothetical risk scenarios that could pose a threat to USDWs in the rare event of occurrence. ExxonMobil's risk assessment process was used to estimate the probability and consequence of each risk scenario based on the experience and judgment of the risk subject matter experts for the Project. The list was sorted from the most probable and consequential risk scenario to the least probable and consequential scenarios so that the critical scenarios could be identified and the response actions to be undertaken.

As shown in Figure 8-1 below, the maximum anticipated risk level for the Project, including the combination of the selected risk scenarios for the ERRP, is within the medium risk category. As mentioned above, a number of risk management steps were already taken to address the potential for CO<sub>2</sub> or brine migration to occur.

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The potential for these features in the upper composite confining zone (UCCZ) to become a migration pathway for a release of CO2 were mitigated by planning for the following actions described in the Application:

- Artificial penetrations through the UCCZ will be re-abandoned to restore containment integrity at each artificial penetration location where the potential for elevated crossflow risk was identified;
- The maximum injection pressure will be maintained below the potential hydraulic fracturing or activation pressure of a natural fault to mitigate the potential for CO2/brine leaks through seal(s) due to mechanical fracturing or migration of CO2/brine along faults;
- State-of-the-art injection well and monitoring well construction methods and mechanical integrity testing (MIT) will be employed to reduce the potential for the loss of internal or external mechanical integrity, which could potentially release CO2 to USDWs or the atmosphere;
- The composition of the injectate stream will be managed and monitored such that unexpected reactions with the potential to impact containment are mitigated;
- CO2 plume and pressure front tracking will be undertaken using a combination of direct and indirect measurements and reported semiannual for review and consideration in AoR reevaluations, at a minimum frequency of every five years; and

- The predictive reservoir modeling will be calibrated and verified using monitoring data to identify the potential for the CO2 plume and pressure front to encounter artificial penetrations that have the potential for CO2 or brine crossflow from the injection intervals to the lowermost USDW and take preventive measures before such an event could occur.

### **8.3 Identification of Resources/Infrastructure in Area of Review**

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The infrastructure development is primarily in the form of county roads and power transmission lines to service the few developed areas.

The water resources in the vicinity of the Project that may be affected by a rare CO2 or brine leakage event that endangers USDW include water wells completed in the Chicot and Evangeline Aquifers above a depth of approximately **Claimed as PBI** which is the lowermost USDW within the AoR.

A total of three water wells were reported to be present within the AoR. A plugged/destroyed water well **Claimed as PBI** was reportedly located **Claimed as PBI** of Injection Well No. 01. Other water wells reported as plugged/destroyed include **Claimed as PBI**, and an unused water well **Claimed as PBI**. One active water well (State **Claimed as PBI**) was reported near the AoR.

Two water conveyance features were identified as the Gallier Canal and Green Pond Gully.

A total of nine oil and gas wells were identified within the AoR, and all were reported as plugged and abandoned in the available records from the Railroad Commission of Texas. Beyond the AoR, the City of Beaumont, Texas, is located more than 5 miles northeast of the AoR boundary and the Town of China, Texas, is located approximately 1 mile northwest of the AoR boundary.

### **8.4 Identification of Risk Scenarios of Interest**

Through the risk assessment process, the following list of scenarios were considered of material probability and consequence as to warrant development of response action plans. Other scenarios were considered but were found to have relatively low probability and consequence factors and do not warrant further consideration at this time. As shown below, a total of nine risk scenarios were considered of material probability and consequence for the ERRP.

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## **8.5 Use of Severity to Define Scope of Response Action**

Response actions were developed for each of the nine hypothetical risk scenarios identified for the ERRP. As listed in Table 8-2, the severity of the risk scenario was fit to a three-tiered categorization of emergency conditions. In addition, the response actions envision a stage-gate process where the information regarding the degree of severity for the emergency condition is evaluated to align the appropriate level of response to bring about mitigation of the emergency event.

Table 8-2: Degrees of Risk for Emergency Events

Emergency Condition	Definition
Major emergency	Events pose immediate substantial risk to USDWs and indirectly from USDW endangerment to resources or infrastructure. Emergency actions involving local authorities (evacuation or isolation of areas) must be initiated.
Serious emergency	Event poses potential serious (or significant) near term risk to USDW and indirectly from USDW endangerment to resource or infrastructure if conditions worsen or no response actions taken.
Minor emergency	Event poses no immediate risk to USDW, resources, or infrastructure.

In accordance with 40 CFR 146.94(b), for the events below, if the injected CO<sub>2</sub> stream and associated brine pressure front may cause an endangerment to a USDW, each set of response actions start with immediately ceasing injection and notifying the UIC Program Director within 24 hours of the confirmation of a release event and the intention to implement the appropriate response action in the ERRP.

## **8.6 Response Plans for Risk Scenarios**

The following response action details are provided to have a pre-approved set of actions in place should measurements collected pursuant to the Section 5 – Testing and Monitoring Plan indicate a malfunction or deviation from permitted limits.

### **8.6.1 Integrity of Injection Well Casing or Cement Seal**

Two hypothetical release mechanisms were identified for injection wells that could possibly result in a release of CO<sub>2</sub> and/or brine to USDWs. CO<sub>2</sub> could be detected at an injection well, implying that internal or external mechanical integrity of an injection well may have been compromised and released CO<sub>2</sub> to USDWs. CO<sub>2</sub> or brine could also be released to USDW at the injection well because of subsurface cement degradation or annular space defects in cement completion.

<b>Hypothetical Release Mechanism:</b> mechanical integrity failure at injection well resulting in release of CO <sub>2</sub> and/or CO <sub>2</sub> and/or brine to USDWs.
<b>Severity:</b>
<ul style="list-style-type: none"> <li>Minor: A malfunction in the monitoring equipment created a false positive indication of a release when in fact none occurred. Alternatively, detection monitoring equipment at the wellhead facility detects the release and the well was shut-in, representing a minor CO<sub>2</sub> release.</li> </ul>

<ul style="list-style-type: none"><li>• Serious: A failed MIT identified a release mechanism, but detection of brine or CO2 was not apparent in the detection monitoring system.</li><li>• Major: A detection of CO2 and/or brine to USDW within the AoR prior to confirming the source of the injection well release point.</li></ul>
<b>Timing of event:</b> Injection and/or post-injection phase.
<b>Avoidance measures:</b>
<ul style="list-style-type: none"><li>• Proper wellbore design, including the use of corrosion resistant cement and CO2 compatible metallurgy of the casing and tubing, will be used for construction of the injection well.</li><li>• Routine inspection of the well casing and cement integrity to identify potential corrosion or deficiencies.</li></ul>
<b>Detection methods:</b>
<ul style="list-style-type: none"><li>• Deficiency identified during continuous pressure and temperature monitoring, pressure falloff tests, and annulus pressure tests.</li><li>• Wellhead pressure exceeds the maximum pressure specified in the permit.</li><li>• Annulus pressure indicates a loss of external or internal integrity/containment.</li><li>• CO2 plume and pressure tracking above UCCZ indicates a change in conditions.</li><li>• Fluid samples from above the UCCZ and USDW indicate a statistically significant change in conditions.</li><li>• MIT identifies a potential issue in the integrity of the well.</li><li>• Well casing and cement bond logs conducted during shut-ins to assess loss decay or corrosion more than acceptable limits.</li></ul>
<b>Response actions:</b>
<ul style="list-style-type: none"><li>• Notify ExxonMobil Site Manager and site personnel.<ul style="list-style-type: none"><li>○ The Site Manager will respond to the event for an initial assessment to determine severity of event.</li></ul></li><li>• Minor Event:</li></ul>

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# Claimed as PBI

- Serious or Major Event:

# Claimed as PBI

**Personnel:** Emergency response personnel, geotechnical professionals, and environmental or water-treatment professionals.

**Equipment:** Drill rig, logging equipment for cement or casing materials, MIT equipment, environmental media sampling equipment, well plugging equipment.

#### 8.6.2 Integrity of Injection Well Casing or Cement Seal for Legacy Wells

Consistent with the potential for CO2 or brine to migrate to USDW at an injection well, artificial penetrations of the UCCZ from legacy oil and gas activities may provide a similar risk scenario. Legacy wells were identified within the AoR that penetrate the UCCZ. The plugging of [REDACTED] legacy wells will be recompleted as a corrective action prior to operation. [REDACTED] remaining legacy wells are present, of which [REDACTED] are proposed for phased corrective action and [REDACTED] wells were found to have sufficient casing and cement plugs to protect USDW. The objective of this risk scenario is to provide the response actions in the event that legacy wells are suspected of CO2 and/or brine leakage to USDWs because of casing or cement integrity issues that are detected in the AoR.

**Hypothetical Release Mechanism:** CO2 and/or brine migrate to USDW at an artificial penetration as detected within the AoR.

##### **Severity:**

- Minor: direct and indirect CO2 plume and pressure front tracking indicate that the legacy well is in the path of migration with the potential to create elevated pressures and a potential for corrosive environment to be created at the well location.
- Serious: direct and indirect CO2 plume and pressure front tracking indicate that the legacy well has been impacted with minor increases of CO2 and/or brine pressures and corrosive fluids.
- Major: direct and indirect CO2 plume and pressure front tracking indicate that the legacy well has been impacted by significantly elevated pressures and a corrosive environment is present that could create a crossflow potential between the injection zone and USDW if a conduit were present.

**Timing of event:** Injection and/or post-injection phase.

##### **Avoidance measures:**

- Compliance with CO2 plume and brine tracking systems.
- Plume model updates to predict pressure front arrival times at legacy well locations and adjust timing of phased corrective action.

##### **Detection methods:**

- CO2 plume and pressure tracking indicates impact is likely.

- Fluid samples from above the UCCZ and USDW indicate a statistically significant change in conditions.
- Well re-entry to collect casing and cement bond logs to assess integrity and well completion materials.

**Response actions:**

For minor severity **Claimed as PBI**



For major and serious events:

# Claimed as PBI



**Personnel:** Emergency response personnel, geotechnical professionals, and environmental or water-treatment professionals.

**Equipment:** Drill rig, logging equipment for cement or casing materials, MIT equipment, environmental media sampling equipment, well plugging equipment.

### 8.6.3 Injection Well Monitoring Equipment Failure

Loss of mechanical integrity of well pressure equipment may occur during operation of the injection wells. A pressure gauge malfunction or other similar equipment could create a shut-off valve malfunction and result in an uncontrolled pressure situation and CO2/brine crossflow to USDW by fault or fracture activation or well casing and/or cement failure in the vicinity of the production casing perforations.

<b>Hypothetical Release Mechanism:</b> Loss of mechanical integrity of well pressure equipment could create a shut-off valve malfunction and result in an uncontrolled pressure situation and CO2/brine crossflow to USDW by fault or fracture activation or by well casing and/or cement failure in the vicinity of the production casing perforations.
<b>Severity:</b>
<ul style="list-style-type: none"><li>• Minor: Failure of monitoring equipment to document compliance with permit operating conditions, but subsequent evaluation of available information demonstrates that well integrity has not been impacted.</li><li>• Serious/Major: Failure of monitoring equipment to document permit operating conditions and subsequent evaluation of the data documents non-compliance with permitted operating conditions and potential for well integrity impacts.</li></ul>
<b>Timing of event:</b> Injection phase and/or post-injection phase.
<b>Avoidance measures:</b>
<ul style="list-style-type: none"><li>• Routine equipment inspection and maintenance to identify potential integrity issues that may be a result of equipment failure.</li><li>• Routine inspections and calibration of monitoring equipment in accordance with manufacturers recommended procedures.</li><li>• Consistent fluid sampling throughout the detection monitoring well network to detect a release above the UCCZ.</li><li>• Redundant pressure and temperature measurements in the injection zones to confirm compliance with permitted operating conditions.</li></ul>
<b>Detection methods:</b>
<ul style="list-style-type: none"><li>• Anomalies in pressure and rate monitoring, pressure falloff tests, and annulus pressure tests.</li></ul>
<b>Response actions:</b>
<ul style="list-style-type: none"><li>• Notify ExxonMobil Site Manager and site personnel.</li></ul>

- The Site Manager will respond to the event for an initial assessment to determine severity of event.
- Notify the UIC Director within 24 hours per 40 CFR 146.91(c).
- Determine the cause and severity of failure to determine if the CO2 stream or formation fluids may have been released into any unauthorized zone.
- For a Minor emergency **Claimed as PBI** [REDACTED]

**Claimed as PBI**

- For a Major or Serious emergency **Claimed as PBI** [REDACTED]

**Claimed as PBI**

# Claimed as PBI

**Personnel:** Emergency response personnel, geotechnical professionals, and environmental or water-treatment professionals.

**Equipment:** Drill rig, logging equipment, cement or casing materials, and air and water testing equipment.

## 8.6.4 Integrity of the UCCZ

Several potential risk scenarios were considered that involve a hypothetical release through naturally occurring faults and fractures or penetration of the UCCZ, creating a migration pathway toward USDW. For example, CO2 could hypothetically leak through natural faults or fractures in the UCCZ within or beyond the AoR and impact USDWs. CO2 or brine could hypothetically migrate horizontally to artificial penetrations within or beyond the AoR that are not sealed at the UCCZ and result in a release to USDWs. Response actions were developed to address such scenarios in the rare event that they occur.

The primary limiting factor for the magnitude of the release for these scenarios was based on the site characteristics described in Section 2 – Site Characterization. CO2 and brine leaks through shales due to mechanical fracturing were not considered a material concern for the Project because of the physical nature of the confining shale materials. Above the UCCZ is approximately <sup>Claimed as PBI</sup> feet of saturated shale and sand. Such a release would likely be detected by the detection monitoring program for groundwater prior to release to the surface. Therefore, ambient air monitoring in the AoR was contingent on the confirmed release of CO2 to USDW at sufficient concentrations to migrate to the surface at levels above health-based thresholds.

The following response actions were developed to mitigate the potential for releases through the UCCZ, which were assumed to occur during injection operations and/or post-injection site care.

<b>Hypothetical Release Mechanism:</b> release through naturally occurring faults and fractures or penetration of the UCCZ, creating a migration pathway toward USDWs.
<b>Severity:</b>
<ul style="list-style-type: none"><li>• Minor: direct and indirect CO<sub>2</sub> plume and pressure front tracking indicate that a fault or fracture is in the path of migration with the potential to create elevated pressures sufficient to cause crossflow above the UCCZ.</li><li>• Serious: direct and indirect CO<sub>2</sub> plume and pressure front tracking indicate that a fault or fracture has been impacted with minor increases of pressures.</li><li>• Major: direct and indirect CO<sub>2</sub> plume and pressure front tracking indicate that a fault or fracture has been impacted by significantly elevated pressures that will likely create a crossflow potential between the injection zone and USDW.</li></ul>
<b>Timing of event:</b> Injection and/or post-injection phase.
<b>Avoidance measures:</b>
<ul style="list-style-type: none"><li>• Compliance with CO<sub>2</sub> plume and brine tracking systems.</li><li>• Plume model updates to predict pressure front arrival times at fault and fracture locations and adjust timing of phased detection monitoring programs elements.</li></ul>
<b>Detection methods:</b>
<ul style="list-style-type: none"><li>• CO<sub>2</sub> plume and pressure tracking indicates impact is likely.</li><li>• Fluid samples from above the UCCZ and USDW indicate a statistically significant change in conditions.</li><li>• Third-party direct or indirect data confirm impact to fault, fracture, or artificial penetration outside of AoR.</li></ul>
<b>Response actions:</b>
<ul style="list-style-type: none"><li>• In the event that the detection monitoring program outline in the Section 5 – Testing and Monitoring Plan or similar third-party monitoring program detects a confirmed release of CO<sub>2</sub> or brine through the UCCZ to the first water-bearing zone above the UCCZ or USDW, notify the UIC Program Director within 24 hours of the emergency event, per 40 CFR 146.91(c).</li><li>• Determine the severity of the event, based on the information available, within 24 hours of notification.</li><li>• For all emergencies (Major, Serious, or Minor):</li></ul>

Claimed as PBI

# Claimed as PBI

**Personnel:** Emergency response personnel, geotechnical professionals, and environmental or water-treatment professionals.

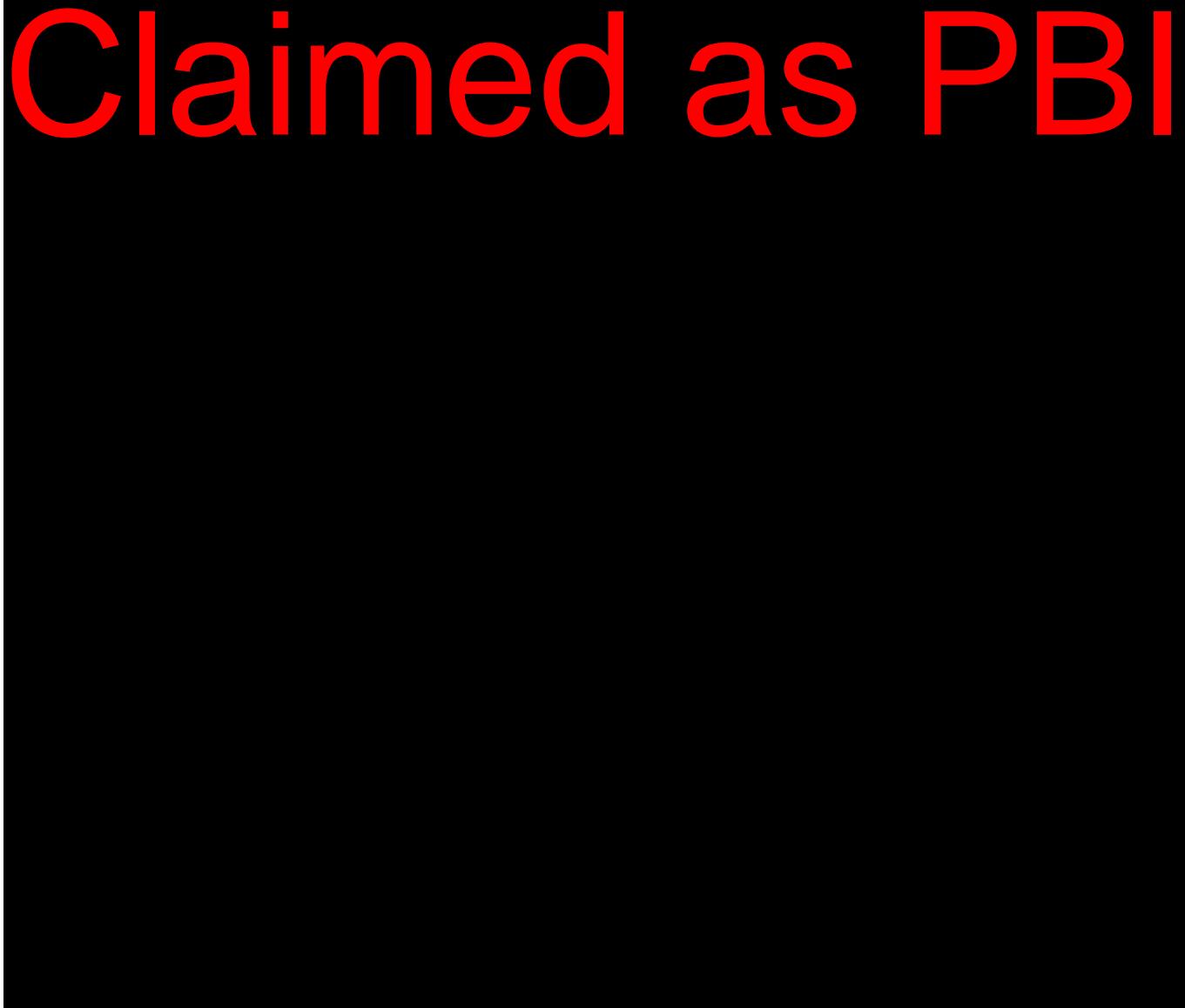
**Equipment:** Drill rig, logging equipment, cement or casing materials, and air and water testing equipment.

## 8.6.5 Induced or Natural Seismic Event

Natural or induced seismic events of sufficient magnitude to create damage were found to be highly improbable for the site location and under permitted operating conditions that are below the critical fracture pressure. In the very rare chance that such seismic conditions occurred, the consequences could be of significance regarding the integrity of the artificial penetrations of the UCCZ and the natural faults and fractures. Therefore, the following response actions were developed to gather information regarding the potential for CO<sub>2</sub> and brine confinement issues to arise under such events.

ExxonMobil will rely upon U.S. Geologic Survey seismic monitoring data for the site and surrounding area to provide information on a seismic event, should one occur. If a review of the data indicates that the event was more likely than not associated with the injection zone in or near the AoR, ExxonMobil will notify the UIC Program Director of the intent to install a site-specific network of seismic stations to provide additional information with the regional seismic data. The details of the site-specific seismic monitoring system will be provided to the UIC Program Director as a modification of Section 5 – Testing and Monitoring Plan. Table 8-3 provides the response actions depending on severity of the seismic event.

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<sup>1</sup> Specified magnitudes determined by local or U.S. Geological Survey (USGS) seismic monitoring stations or reported by the USGS National Earthquake Information Center (NEIC) using the national seismic network.

# Claimed as PBI

## 8.7 Response Personnel and Equipment

Site personnel, Project personnel, and local authorities will be relied upon to implement this ERRP and will be dispatched in the case of an emergency. In the event of an emergency, appropriate city, county, and state emergency responders and agencies may be notified based on severity of the risk. Contact information for ExxonMobil Emergency Authorities and state and local emergency services are outlined in Table 8-4 and Table 8-5, respectively.

A site-specific emergency contact list will be developed and maintained during the life of the Project. ExxonMobil will provide the current site-specific emergency contact list to the UIC Program Director.

Table 8-4: Contact Information of ExxonMobil Emergency Authorities

Name	Title	Telephone Number
Claimed as PBI	LCS USGC Venture Executive	Claimed as PBI
Claimed as PBI	Emergency Response & Preparedness Manager	Claimed as PBI
Claimed as PBI	Public & Government Affairs Advisor	Claimed as PBI

Table 8-5: Emergency Services

Agency	Telephone Number
Claimed as PBI	Claimed as PBI
Claimed as PBI	
Texas Division of Emergency Management	(512) 424-2208
Texas Department of Public Safety	(512) 424-2000
State of Texas Spill-Reporting Hotline	1-800-832-8224
Texas Parks and Wildlife Department	(512) 389-4800
EPA Region 6	800-887-6063 or 214-665-2760
EPA Class VI Contact – Brandon Maples	214-665-7252
Texas Department of Natural Resources	(512) 389-4800
Claimed as PBI	
National Response Center	1-800-424-8802
State of Texas Spill-Reporting Hotline	1-800-832-8224
EPA National Response Center (24 hours)	(800) 424-8802

Necessary equipment for emergency and remedial response may vary depending on the event. Generally, no specialized equipment will be required for response actions (such as cessation of injection, well shut-in, and evacuation). If specialized equipment (such as a drilling rig or logging equipment) is required, ExxonMobil will be responsible for its procurement.

### **8.8 Communications Plan and Emergency Notification Procedures**

As appropriate, ExxonMobil will communicate to the relevant public authorities about an event that may require emergency response so that the public understands the emergency event and if there are any environmental, health, or safety concerns. Based on the emergency event, ExxonMobil will determine the appropriate information, timing, and communication method for the event. This information may include potential impact of the event on drinking water or the severity of the event, actions taken or planned to address the event, and other information needed to protect the public during the event.

If required, ExxonMobil will also communicate with other entities who may need to be informed about or act in response to the event. These may include local water purveyors or operators, CO<sub>2</sub> suppliers, pipeline operators, oil and gas operators, landowners, and other departments or authorities as guided by the UIC Program Director.

### **8.9 Flood Hazard Risk**

Injection Wells No. 01, No. 02, and No. 03 and the surrounding area are designated as Federal Emergency Management Agency flood hazard zone X (unshaded). Flood hazard zone "X" (unshaded) corresponds to areas determined to be outside of the 500-year floodplain. This zone is an area of minimal flood hazard, which is higher than the elevation of the 0.2-percent-annual-chance flood. The well locations and Federal Emergency Management Agency flood zones are shown in Appendix E.

### **8.10 Plan Review**

The UIC Program Director will evaluate this proposed EERP to verify that EERP meets the requirements of 40 CFR 146.94(a) and that the plan accounts for all site-specific conditions. The approved EERP is enforceable, whether or not it is a condition of the permit, because the plan itself and UIC Program Director's approval are required by the Class VI Rule [40 CFR 146.93(a)].

This EERP shall be reviewed:

- At least once every five years following its approval by the permitting agency [40 CFR 146.94(d)].
- Within one year of any AoR reevaluation [40 CFR 146.94(d)(1)].
- Following any significant changes to the facility, such as addition of injection or monitoring wells, on a schedule determined by the Director [40 CFR 146.94(d)(2)]; or
- When required by the Director [40 CFR 146.94(d)(3)].

If the review indicates that no amendments to the EERP are necessary, ExxonMobil will provide the permitting agency with the documentation supporting the "no amendment necessary" determination. If the review indicates that amendments to the EERP are necessary,

amendments shall be made and submitted to the permitting agency within 30 days following an event that initiates the EERP review procedure.

The amended plan must be approved by the UIC Program Director and would then be incorporated into the Class VI Permit. If significant changes to the plan are needed, the UIC Program Director may need to modify the permit. A permit modification under 40 CFR 144.39 would require notification of the public and an opportunity for comment. Minor changes to the plan, as defined under 40 CFR 144.41, do not require a permit modification or a public process under 40 CFR Part 124.

#### **8.11 Staff Training and Exercise Procedures**

Personnel will be trained in their duties and responsibilities related to these facilities. Emergency Response Drills will be conducted annually via simulated onsite or table top scenarios. All plant personnel, visitors, and contractors must complete a plant overview orientation before entering the facilities. ExxonMobil will coordinate with local mutual aid emergency responders over the potential hazards and response scenarios of the site.