

7. Pre-Injection/Operational Testing Plan

The testing activities at the CCS#3 Well described in this Section are restricted to the pre-injection phase. Testing and monitoring activities during the injection and post-injection phases are described in the Testing and Monitoring Plan, along with other non-well related pre-injection baseline activities such as geochemical monitoring.

The pre-injection operational testing plan presented herein addresses the requirements of 40 CFR Section 146.87 (a-f):

- Deviation checks during drilling (a)(1)
- Logging required before installation of surface casing and long string casing (a)(2)(3)
- Tests to demonstrate internal and external mechanical integrity (a)(4)(5)
- Proposed coring program (b)
- Proposed fluid sampling program, including those to assess the chemical characteristics of the injection and confining zones (c)(d)
- Tests to verify hydrogeologic conditions in the injection and confining zone and determine fracture pressure(d)(e)

7.1 Tests during well drilling/construction

ADM will perform logging, surveys and tests to determine or verify the depth, thickness, porosity, permeability, lithology, and formation fluid salinity in all relevant geologic formations. These tests shall include:

- Deviation checks that meet the requirements of 40 CFR 146.87(a)(1);
- Logs and tests before and upon installation of the surface casing that meet the requirements of 40 CFR 146.87(a)(2);
- Logs and tests before and upon installation of the long-string casing that meet the requirements of 40 CFR 146.87(a)(3);
- Tests to demonstrate internal and external mechanical integrity that meet the requirements of 40 CFR 146.87(a)(4); and
- Any alternative methods that are required by and/or approved by the Director pursuant to 40 CFR 146.87(a)(5).

7.1.1 Deviation Checks

The subsurface and surface design (casing, cement, and wellhead designs) meets the requirements to appropriately manage CO₂, the preserve mechanical integrity during injection operations and to sustain the integrity of the caprock to ensure CO₂ remains in the Mt. Simon. For reasons such as equipment or

supply availability, or changes to the supplemental monitoring program, the final well design may vary but will meet or exceed requirements in terms of strength and CO₂ compatibility.

The injection well is planned to be drilled with an inclination of 5° degrees or less. During drilling, the wellbore trajectory will be tracked and surveyed every 1,000 feet to reduce the risk of interception with adjacent wellbores.

[7.1.2 Mechanical Integrity Testing and Logging During and after Casing Installation](#)

Wireline logging is an important tool that will be used to identify many characteristics of the formations encountered during drilling and for demonstrating mechanical integrity of the well. The logs discussed in this section are summarized in Table 7.1.2-1, and will apply to proposed injection wells CCS#3.

Mechanical integrity testing and logging are described below. ADM will provide a schedule for all testing and logging to the permitting agency at least 30 days in advance of conducting the first such tests and/or logs.

[7.1.2.1 Historic Logs](#)

Table 7.1.2-1 presents a summary of the previous geophysical logs collected in the CCS and VW wells. The logging programs for the two CCS wells were similar. CCS#1 and 2 both had, at a minimum, triple combo logs (gamma ray, spontaneous potential, caliper, resistivity, bulk density, and neutron porosity) performed on all sections of each well. All casing strings had either a cement bond log (CBL) or ultrasonic CBL performed to confirm the quality of cement behind each string of casing. The intermediate and long string sections of the wells had logging programs conducted that included triple combo logs as well as dipole sonic, formation micro-imaging (fracture finder), spectral gamma ray, and nuclear magnetic resonance as part of the suite of open hole logs. Logs from CCS#1 added the modular dynamics tester and the versatile seismic imager for the long string section. Logs from CCS#2 added the Litho-Scanner (Lithology Scanner) performed on the long string section. Triple combo logs were performed in wells VW#1 and 2. The logging suite performed on the CCS wells presents a comprehensive geophysical analysis of the injection zone, confining zone, and overlying formations. A summary of the geologic characterization is provided in Section [3. Site Geologic Characterization](#) of this application document.

Table 7.1.2-1. Log Summary: Existing Site Wells

Well Name	Log Vendor	Log Title	Date Run	Depth Interval (MD ft. KB)
CCS#1	Schlumberger	GR, CAL, SP, Resistivity, RHOB, NPHI	3/9/2009	Sensitive, Confidential, or Privileged Information
CCS#1		Variable Density CBL		
CCS#1	Schlumberger	GR, CAL, SP, Resistivity, RHOB, NPHI	4/5/2009	
CCS#1	Schlumberger	Sonic Scanner and FMI	4/5/2009	
CCS#1	Schlumberger	CMR, ECS, HNGS	4/5/2009	
CCS#1	Schlumberger	MSCT	4/5/2009	
CCS#1		Ultrasonic Cement Imaging		
CCS#1	Schlumberger	GR, CAL, SP, Resistivity, RHOB, NPHI	4/26/2009	
CCS#1	Schlumberger	Sonic Scanner and FMI	4/26/2009	
CCS#1	Schlumberger	CMR, ECS, HNGS	4/26/2009	
CCS#1	Schlumberger	MSCT	4/26/2009	
CCS#1	Schlumberger	MDT	4/26/2009	
CCS#1	Schlumberger	VSIT	4/26/2009	
CCS#1		Ultrasonic Cement Imaging		
CCS#1		Variable Density CBL		
CCS#1		Pressure/Temperature Log		
CCS#1		Thermal Neutron Decay (Formation Sigma) Log		
CCS#1		Multi-Finger Caliper Log		
CCS#1		CCL and Perforation Record		
CCS#1		Injection Fullbore Spinner Logs		
CCS#2	Schlumberger	GR, Resistivity, NPHI, SlimPulse	1/12/2015	Sensitive, Confidential, or Privileged Information
CCS#2	Schlumberger	CAL, DSLT, GPIT	1/12/2015	
CCS#2	Wayne County Well Surveys	CBL	1/16/2015	
CCS#2	Schlumberger	GR, CAL, SP, Resistivity, RHOB, NPHI	5/3/2015	
CCS#2	Schlumberger	Sonic Scanner, FMI, CAL, GPIT	5/3/2015	
CCS#2	Schlumberger	ECS, HNGS	5/3/2015	
CCS#2	Schlumberger	Variable Density CBL	5/31/2015	
CCS#2	Schlumberger	Isolation Scanner Cement Evaluation	5/31/2015	
CCS#2	Schlumberger	Isolation Scanner Casing Integrity	5/31/2015	
CCS#2	Schlumberger	GR, CAL, SP, Resistivity, RHOB, NPHI	5/29/2015	
CCS#2	Schlumberger	Sonic Scanner, FMI, CAL, GPIT	5/29/2015	
CCS#2	Schlumberger	CMR, Litho Scanner, HNGS	5/29/2015	
CCS#2	Schlumberger	MSCT	5/29/2015	

Well Name	Log Vendor	Log Title	Date Run	Depth Interval (MD ft. KB)
CCS#2	Schlumberger	Multi-finger Imaging Tool	6/10/2015	Sensitive, Confidential, or Privileged Information
CCS#2	Schlumberger	Variable Density CBL	6/10/2015	
CCS#2	Schlumberger	Isolation Scanner Cement Evaluation	6/10/2015	
CCS#2	Schlumberger	Isolation Scanner Third Interface Echo	6/10/2015	
VW#1		GR, SP, Resistivity, RHOB, NPHI, Sonic		Sensitive, Confidential, or Privileged Information
VW#1		CBL and/or Cement Imaging		
VW#1	Schlumberger	GR, CAL, Resistivity, RHOB, NPHI		
VW#1	Schlumberger	Sonic Scanner		
VW#1	Schlumberger	GR, CAL, Resistivity, RHOB, NPHI		
VW#1	Schlumberger	Sonic Scanner		
VW#1	Schlumberger	MDT	10/25/2010	
VW#1	Schlumberger	XPT (Pressure Express Tool)	11/17/2010	
VW#2	Schlumberger	GR, CAL, Resistivity, RHOB, NPHI	10/8/2012	Sensitive, Confidential, or Privileged Information
VW#2	Schlumberger	Sonic Scanner	10/8/2012	
VW#2	Schlumberger	GR, CAL, Resistivity, RHOB, NPHI	10/31/2012	
VW#2	Schlumberger	Sonic Scanner	10/31/2012	
VW#2	Schlumberger	XPT (Pressure Express Tool)	10/31/2012	
VW#2	Schlumberger	RST		

7.1.2.2 Proposed Surface Casing Logs

Table 7.1.2-2 presents the proposed log suite for CCS#3. Each open hole section (prior to setting each casing string) will be logged with multiple suites to fully characterize the geologic formations (reservoirs and seals). At a minimum, all wireline runs will have resistivity, spontaneous potential (SP), gamma ray (GR) and caliper logs.

Table 7.1.2-2. Proposed Logging for CCS#3

Log Type (Open Hole or Cased Hole)	Log Run Title	Hole Section
Open Hole	GR, SP, Resistivity, Caliper	Sensitive, Confidential, or Privileged Information
Cased Hole	Radial Cement Bond Log	
Cased Hole	Temperature Log	
Open Hole	GR, SP, Resistivity, Caliper	
Open Hole	Bulk Density, Neutron Porosity	
Open Hole	Sonic	
Cased Hole	Radial Cement Bond Log or Ultrasonic Cement Bond Log	
Cased Hole	Temperature Log	
Open Hole	Spectral GR, SP, Resistivity, Caliper	
Open Hole	Bulk Density, Neutron Porosity	
Open Hole	Sonic	
Open Hole	Nuclear Magnetic Resonance	
Open Hole	Fracture Finder	
Cased Hole	Radial Cement Bond Log or Ultrasonic Cement Bond Log	
Cased Hole	Temperature Log	

With the exception of the 20" surface casing, a cement bond log (CBL) with radial capability and/or ultrasonic cement imaging logs will be run on all casing strings. In addition to cement evaluation data, ultrasonic imaging logs will provide baseline casing thickness and internal radius measurements. The long string casing internal diameter will be baselined by running a multi-finger caliper (MFC) log. Follow-up MFC logs will be performed in the event the injection tubing is removed during a well recompletion.

Regarding the surface casing, due to the large casing size, a cement bond log with radial imaging is not practical and when performed typically yield ambiguous results. To achieve good cement mechanical integrity, the best practice indicators are returning excess clean cement to the surface during cement displacement, having minimal cement fallback after completing cement displacement, and successfully passing a casing shoe test.

Based on previous experience with CCS#1 and CCS#2, hydraulic stimulation of the injection zone is not expected but an acid matrix stimulation to reduce perforation skin damage may be necessary. To reduce the risk of formation damage during well perforation, the operator will employ a static or dynamic underbalanced techniques.

After the well is cased, pre-injection testing will be performed to provide well specific data for the reservoir model. During these tests, P/T gauges will be deployed near the perforated interval while the pressure fall-off and step rate tests are performed. The final perforating scheme will be based on interpretation of the test results.

After installation of the 5-1/2" injection tubing, a baseline temperature and pulse neutron (PN) type logs will be run. These logs will be compared to subsequent timelapse logs to inform the operator about the accumulation and movement of CO₂ behind the wellbore and the state of the well's mechanical integrity. The PN logs will provide information about the location and vertical movement of CO₂ near the wellbore. This allows the operator to monitor the movement of CO₂ within the injection zone and above the seal formation. Both logging techniques will be used to demonstrate the mechanical integrity of the well.

7.1.2.3 Proposed Mechanical Integrity Testing

After setting and cementing the casing, a radially capable cement imaging log will be run to evaluate the cement bonding between the casing and the reservoir. Next, the casing string will undergo a one-hour pressure test at 750 psig and will pass if the pressure loss is less than 3%. After passing these tests, the well will be perforated and completed with 5.5-inch tubing and packer assembly. After well completion, the tubing/casing annulus will undergo a one-hour pressure test. As mentioned above, a baseline pulse neutron log will be run. Repeat PN logs can be run if anomalous temperature data indicates a need for further analysis. Monitoring the distributed temperature system (DTS) data across the top of the Mt. Simon Sandstone formation, as well as the porous zones above the seal, will be used to validate the integrity of the completion. Table 7.1.2-3 below is a summary of MITs and pressure fall-off tests to be performed prior to injection.

Table 7.1.2-3 Summary of MITs and Pressure Fall-Off Test to be Performed Prior to Injection

Class VI Rule Citation	Rule Description	Test Description	Program Period
[40 CFR 146.89(a)(1)]	MIT – Internal	Annulus Pressure Test	Prior to Operation
[40 CFR 146.87(a)(4)]	MIT – External	Temperature Log	Prior to Operation
[40 CFR 146.87(e)(1)]	Testing prior to operating	Pressure Fall-off Test	Prior to Operation

7.2 Injection zone characterization and core sampling

ADM will provide a schedule for all testing and logging, including coring events, to the permitting agency at least 30 days in advance of conducting the first such tests and/or logs. Logging is described in Section 7.1, above.

7.2.1 Historic injection zone fluid characterization and core sampling

The following historic information is provided to provide background data pertinent to establishing the proposed core and injection zone sampling and analysis at CCS#3.

7.2.1.1 Historic Fluid Sampling

This section discusses the historic fluid sampling that has been conducted in CCS#1 and CCS#2 to characterize the Eau Claire (confining zone) and Mt. Simon (injection zone). The previous sampling and analysis of the fluid of the injection zone included fluid temperature, pH, conductivity, reservoir pressure, and static fluid level. In addition, total dissolved solids (TDS), fluid chemistry, density, and viscosity of the fluid in the injection zone were performed. The fluid samples were collected using Schlumberger's Modular Formation Dynamics Tester (MDT). Sampling of CCS 1 and CCS 2 were completed using the MDT tool at several depths within the Mt. Simon. Average fluid parameters of the injection zone are included in Table 7.2.1-1. These were collected using the MDT at multiple points in the injection zone. Using the fluid parameters from Table 7.2.1-1, an estimated static fluid level for the injection reservoir was calculated to be 249.5 feet above mean sea level (AMSL). Explanation of the historical analyses and results are discussed in more detail in previous permit applications and completion reports.

Table 7.2.1-1. Average Injection Zone Fluid Parameters

Constituent	Value
Conductivity (mS/cm)	Sensitive, Confidential, or Privileged Information
TDS (mg/L)	
Cl ⁻ (mg/L)	
Br ⁻ (mg/L)	
Alkalinity (mg/L)	
Na ⁺ (mg/L)	
Ca ²⁺ (mg/L)	
K ⁺ (mg/L)	
Mg ²⁺ (mg/L)	
pH (units)	
Pressure (psi)	
Temperature (deg. F)	
Density (g/L)	

Viscosity (Pa sec)

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Historic information pertaining to physical characteristics of the injection and confining zone can be derived from log and core data and are discussed below.

7.2.1.2 Historic Well Coring Programs

Thorough coring programs, utilizing both conventional whole core and rotary sidewall core and including wide-ranging analytical suites, were performed at CCS#1, CCS#2, VW#1, VW#2, and GM#2. While the focus on coring and analysis was the confining and injection zones in VW#2 and CCS#2, core-related information on overlying formations was also gathered in VW#1, CCS#1, and GM#2. A total of approximately 1,268 feet of whole core was recovered between the five wells, the bulk of which was captured in VW#1 (700 feet) and VW#2 (392 feet). Recovered sidewall core samples from the two injection wells and two verification wells totaled 400 samples. Of these 400 samples, 174 sidewalls were from VW#1, 62 sidewalls were from CCS#1, 69 sidewalls were from VW#2, and 95 sidewalls were from CCS#2. A summary of the core collected in these wells is presented in Appendix D and is discussed in more detail below.

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routine core analysis, MICP, and pulse decay permeability.

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7.2.2 Proposed Coring and Fluid Sampling Program

This section addresses the pre-operational sampling proposed by ADM to ensure that sufficient characterization of the subsurface at CCS#3 is performed in addition to satisfying Class VI regulations. These requirements include injection and confining zone physical and chemical characteristics including coring and formation fluid sampling. Subpart (f) of §146.87 requires 30 day notice of any logging or testing of the Class VI well to the Director so that the Director has the opportunity to witness well activities.

7.2.2.1 Proposed Coring Program

The coring program and analysis that ADM performed at CCS#1, CCS#2, VW#1, and VW#2 provides extensive characterization of various formations, particularly the confining zone and injection zone, as described in

Section 7.2.1. Appendix D provides more detail on the core data collected in these wells. The data provided from the site wells included both whole core and sidewall core focusing on the confining zone and injection zone. The testing in the existing core included routine core analysis (porosity, permeability, grain density, fluid saturations, and lithology descriptions), mercury injection capillary pressure, geomechanics, x-ray diffraction, quantitative evaluation of minerals by scanning electron microscopy, focused ion beam electron microscopy, tight rock analysis, total organic carbon content, nuclear magnetic resonance, pulse decay permeability, laser grain size analysis, CT scanning, and thin sections.

The coring program for CCS#3 will include at least 90 feet of whole core within the confining zone (Eau Claire) and injection zone (Mt. Simon), as well as potential sidewall coring within select formations, as necessary based on open hole logging results. Routine core and geomechanical analysis will be performed on recovered core, as applicable. Data will be correlated with openhole geophysical well logs from the wells, and compared to core sample results obtained from previous wells.

7.2.2.2 Proposed Fluid Sampling Program

Although sufficient data has been acquired from the reservoir from the two injectors already installed and tested at the site, prior to any well testing in a newly drilled well a sample of the formation fluid from the injection zone will be collected to measure the pH, conductivity, physical, chemical, static fluid level and other characteristics to satisfy §146.87 (c) and (d)(3), and to determine whether the CO₂ plume has reached any newly drilled injector (CCS#3) during the time of completion. These data are also important in the analysis of the initial pressure falloff test. Collection of these data, and previous reservoir sampling in combination with temperature and pressure logs noted in Section [7.4 Injection and confining zone formation testing](#), will satisfy §146.87 (c).

Well sampling will be conducted to satisfy regulations stated in Section 7.2. While a similar method of sample collection via wireline used to sample CCS#1 and CCS#2 is expected, the detailed procedure will depend on borehole conditions encountered during operations, as well as equipment and personnel availability experienced near the time of completion of the well. Detailed procedures outlining the expected sampling and subsequent analysis will be submitted in accordance with federal regulations and guidance prior to implementing a specific sampling procedure in the field.

7.3 Fracture pressure and downhole hydrogeologic testing of conditions

Specific regulatory requirements exist as permitting standards for testing and data collection associated with new wells. As presented at §146.82 (c), (d) and (e), the following are among the data that must be acquired for any new Class VI Injection well:

- (c) The owner or operator must record the fluid temperature, pH, conductivity, reservoir pressure, and static fluid level of the injection zone(s).

(d) At a minimum, the owner or operator must determine or calculate the following information concerning the injection and confining zone(s):

(1) Fracture pressure;...

(e) Upon completion, but prior to operation, the owner or operator must conduct the following tests to verify hydrogeologic characteristics of the injection zone(s):

(1) A pressure fall-off test; and

(2) A pump test; or

(3) Injectivity tests.

CCS#3 is a new well that may be installed at the site in the future and hence must comply with requirements at §146.87 (c), (d) and (e) (see Section 7.2 for the proposed fluid sampling and coring program). Data obtained as part of previous injection and monitoring requirements at the site are relevant to data acquisition to be collected from any new site wells. Historic activities are summarized in Section 7.3.1, which supports the proposed CCS#3 data collection activities presented in Section 7.3.2

7.3.1 Historic testing

This section discusses the historic testing that has been conducted in CCS#1 and CCS#2 to characterize the Eau Claire (confining zone) and Mt. Simon (injection zone).

The well testing performed in both injection wells at the ADM site consisted of a pressure build-up falloff test (FOT) and a step rate test (SRT). The well testing performed in CCS#1 and 2 are presented in Table 7-6. As presented in previous and forthcoming sections, historical sampling and testing activities conducted to characterize the subsurface at the site were comprehensive. No pressure transient testing was conducted in the VM wells.

7.3.1.2 **Historic Reservoir Testing**

Well testing in the two injection wells CCS#1 and CCS#2 included an initial FOT and an SRT. A description of tests performed at each injection well is discussed in greater detail below and summarized in Table 7-6.

Table 7-6. Testing Summary: Existing Site Wells

Activity	Well	Formation	Depth (feet KB)	Comment
Pressure of Reservoir	CCS#1	Sensitive, Confidential, or Privileged Information		From Pressure Falloff
	CCS#2			From Pressure Falloff
Pressure Step Rate	CCS#1			Permit Perforations
	CCS#2			Permit Perforations (Gross Interval)
Pressure Falloff	CCS#1			Permit Perforations
	CCS#2			Permit Perforations (Gross Interval)

CCS 1 Test History

Three FOTs of varying duration were conducted in September and October 2009 as part of the initial completion of CCS#1. FOT involve two parts. During the first portion of the falloff tests, the reservoir was stressed by injecting fluid at a (traditionally) relatively stabilized rate, causing an increase in reservoir pressure. During the second portion of the test, injection was stopped and the well shut-in while the reservoir pressure monitored as it decayed and approached near-static condition.

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After this test, the perforations were acidized and an SRT was conducted by pumping at increasing rate steps to observe a change of the well injectivity. Following the SRT, treated water was injected at a rate of 3.1 bpm (130 gpm) for five hours. After this period of relatively stable injection, the well was shut in and pressure was monitored for approximately 45 hours as a second FOT.

A third FOT was conducted after additional perforations were made in the well and subsequently stimulated with acid. **Sensitive, Confidential, or Privileged Information**

[REDACTED] For the third FOT, treated water was injected at an increasing rate of 3.1 to 4.2 bpm (130 to 176 gpm) over 6.5 hours and then at 4.2 bpm (176 gpm) for an additional 6.5 hours. After this 13-hour period of injection, the well was shut in and pressure was monitored for 105 hours.

Analysis of the pressure transient data using analytical simulations was performed by Schlumberger. [REDACTED]

[REDACTED] Based on an average effective injection zone thickness of 75 feet, a permeability of 185 millidarcies (md) was calculated.

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[REDACTED] This analysis was performed graphically by plotting the pressure at the end of each step versus rate. The intersection of lines before and after a pressure sensitive threshold was used to estimate the fracture pressure. This approach is an industry standard method for estimating conservative values.

Copies of the pressure transient data and analyses were presented to EPA in previous reports and are available upon request.

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[REDACTED]

CCS#2 Test History

An SRT and two FOTs were performed in July 2015 as part of the initial completion of CCS#2.

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[REDACTED]

This data was analyzed by Schlumberger and was reported in an Injection-Falloff Analysis dated August 24, 2015. Schlumberger's Report Summary stated:

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[REDACTED]

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Copies of the pressure transient data and analyses were presented to EPA in previous reports and are available upon request.

7.3.2 Proposed CCS#3 testing program

This section addresses the pre-operational testing proposed by ADM to ensure that sufficient characterization of the subsurface at CCS#3 is performed and to satisfy Class VI regulations. These requirements include those addressed in Section 7.2 (e.g. injection and confining zone physical, chemical, and fluid characteristics) as well as fracture pressure determination and well testing located in §146.87(d)(1) and (e). ADM will provide 30 day notice of any logging or testing of the Class VI well to the Director so that the Director has the opportunity to witness well activities.

7.3.2.1 Well Testing - Injection Zone

After CCS#3 has been cased and perforated and fluid sampling has been complete, an SRT will be performed to obtain a confirmatory estimate of the fracture pressure of the injection zone. Subsequent wells will not be subjected to an SRT upon completion unless irregular data is obtained from the third injection well. It is noted that the existing Class VI program offers the following discussion regarding the use of additional site SRT data, and similar practices are proposed for new injectors:

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7.3.2.2 Well Testing - Confining Zone

As discussed in Section 7.3.2.2, a “mini-frac” using the MDT tool was used to estimate the fracture gradient of the confining zone in CCS 1 and CCS 2. In addition, dipole sonic data are available through the confining zone to estimate the geomechanics. If the results of CCS#3 geophysical well logging conducted through the

confining zone indicate that conditions are similar to the results found using previous logging conducted at CCS 1 and 2, then no additional testing of the confining zone is proposed for CCS#3. Dipole sonic logs will be correlated to existing well logs with similar results and can also be used to infer the representativeness of the CCS 1 and 2 MDT “mini-frac” results.

7.4 Injection and confining zone formation testing

CCS#3 is a new well that may be installed at the site in the future and hence must comply with requirements at §146.87 (a), (b) and (e). Data obtained as part of previous injection and monitoring requirements at the site are relevant to data acquisition to be collected from any new site wells and are summarized in Tables 7.1.2-1, 7.1.2-2, and 7.1.2-3. Historic activities are summarized in Section 7.3.1, which supports the proposed CCS#3 data collection activities presented in Section 7.3.2 because a significant quantity of data has already been obtained to characterize the site during previous testing that supports the proposed CCS#3 program.

7.5 Quality Assurance Surveillance Plan (QASP)

The QASP is provided in [APPENDIX C: Quality Assurance and Surveillance Plan](#) which meets relevant requirements under 40 CFR 146.90