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Plan revision date: June 2024

EMERGENCY AND REMEDIAL RESPONSE PLAN  
40 CFR 146.94(A)  
Bayou Bend East SL20220050 (BBE)

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**10 EMERGENCY AND REMEDIAL RESPONSE PLAN**  
**40 CFR 146.94(A)**

**Bayou Bend East SL20220050 (BBE)**

**10.1 Facility Information**

Facility Name: BAYOU BEND EAST SL 20220050 – PHASE 1 (BBE-P1)  
SL20220050 W1, SL20220050 W2, SL20220050 W3, SL20220050 W4,  
SL20220050 W5, SL20220050 W6

Facility Contact: Claimed as PBI  
1500 LOUISIANA STREET, 11TH FLOOR  
HOUSTON, TEXAS 77002

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Site Location: GULF OF MEXICO, TEXAS STATE WATERS  
HIGH ISLAND BLOCK  
JEFFERSON COUNTY, TEXAS

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This Emergency and Remedial Response Plan (ERRP) describes actions that Bayou Bend CCS LLC (Operator) shall take to address movement of the injection fluid or formation fluid in the event that there is an endangerment to a local resource (Section 10.2.1) during the construction, operation, or post-injection site care (PISC) periods. Claimed as PBI

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If the Operator obtains evidence that the injected CO<sub>2</sub> stream and/or associated pressure front may cause an endangerment to a local resource, the Operator must perform the following actions:

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

Where the phrase “initiate shutdown plan” is used, the following protocol will be employed: the Operator will immediately cease injection to applicable well. However, in some circumstances, the Operator will, in consultation with the UIC Program Director, determine whether gradual cessation of injection (using the parameters set forth in the Summary of Requirements of the Class VI permit) is appropriate.

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## 10.2 Local Resources and Infrastructure

The Bayou Bend East SL20220050 Phase 1 (BBE-P1) project site is located on the Jefferson County Lease, High Island Block, Jefferson County (SL20220050, General Land Office, April 1, 2022; 40,865 acres) in Texas State Waters, between approximately 4 and 10 nautical miles from shore. The location, resources and infrastructure are located within the 1973 Port Arthur and 1975 Houston United States Geological Survey (USGS) 7.5-minute Quadrangle Maps. Resource and infrastructure addressed in this plan are shown on Figures 10 1 through 10 4. Estimated water depth in the vicinity of the proposed well locations ranges between approximately 19 and 25 feet.

### 10.2.1 Local Resources

Local resources in the vicinity of the proposed injection wells that may be affected by an emergency event at the project site include:

- Cultural Artifacts.
- Threatened and Endangered Species

#### *Cultural Artifacts*

A cultural desktop investigation completed for the project by Environmental Resources Management (ERM) on behalf of the Operator in February 2023 reported approximate locations of nine shipwrecks.<sup>1</sup> According to the information collected during the cultural desktop investigation, it is unknown if these are of cultural significance. The Operator's practice is to clear each well location prior to drilling and avoid placing wells or facilities in these locations. No other artifacts of potential cultural significance were identified in the survey (**Figure 10-1**).

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<sup>1</sup> ERM, February 2023. *Cultural Resources Desktop Review, Bayou Bend Carbon Capture and Storage Project, Jefferson County, Texas.*

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## Threatened and Endangered Species

The project location is near the McFaddin National Wildlife Preserve and the Candy Cain Abshier Wildlife Refuge. A desktop biological survey was completed in 2023 that revealed the project location area does contain potential suitable habitat for seven federally listed species including seven state listed species (**Figure 10-2**).<sup>2</sup> These species are the West Indian manatee, shortfin mako shark, giant manta ray, green sea turtle, hawksbill sea turtle, loggerhead sea turtle, and Kemp's ridley sea turtle due to proximity to nearshore and coastal habitats and suitable depths to support these species. Additionally, the southern portion of the project area is located within loggerhead sea turtle critical habitat, containing both nearshore reproductive habitat and *Sargassum* habitat. *Sargassum* is a genus of brown macroalgae that is found in shallow coastal tropical and temperate marine waters that form free floating rafts that can stretch for miles. This floating habitat provides food, refuge, and breeding grounds for an array of animals such as fish, sea turtles, marine birds, crabs, shrimp, and more.

The National Marine Fisheries Service (NMFS) Essential Fish Habitat (EFH) Mapper identified 59 EFH species including shrimp, reef fish, coastal migratory pelagic species, and highly migratory species such as sharks with potential to occur within the Project area. In addition, on July 20, 2023, United States Fish and Wildlife Service (USFWS) identified the Project area as critical habitat for the Green Sea Turtle<sup>3</sup>. The NMFS<sup>4</sup> proposed the Project area as critical habitat for the Green Sea Turtle on July 19, 2023. The Project plans to avoid migrating, nesting, and breeding areas and will implement best available technologies (BAT), as needed, or required in ecologically sensitive areas that might be nesting, breeding, and/or migratory zones for threatened or endangered species.

Up to 26 marine mammal species including the six federally listed species are identified by federal and state databases to have the potential to occur within the Project area. The most likely cetacean species to occur within the area is the common bottlenose dolphin or Atlantic bottlenose dolphin (*Tursiops truncatus*) and Atlantic spotted dolphins (*Stenella frontalis*). The remaining identified species could occur in the area but are rare along the east Texas coast.

No artificial reefs, oyster reefs, or seagrass areas were identified in the studies. Field studies will be completed at injection and monitoring well locations, prior to drilling, to confirm absence of reefs or seagrass. Additionally, BAT will be implemented during drilling, construction, operation, and PISC phases of the project to minimize potential impacts.

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<sup>3</sup> [Green Sea Turtle Critical Habitat | U.S. Fish & Wildlife Service \(fws.gov\)](https://www.fws.gov/green-sea-turtle-critical-habitat)

<sup>4</sup> [Federal Register: Endangered and Threatened Wildlife and Plants: Proposed Rule To Designate Marine Critical Habitat for Six Distinct Population Segments of Green Sea Turtles](https://www.federalregister.gov/documents/2023/07/19/2023-14041/federal-register-endangered-and-threatened-wildlife-and-plants-proposed-rule-to-designate-marine-critical-habitat-for-six-distinct-population-segments-of-green-sea-turtles)

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10.2.1.1 Infrastructure

Infrastructure in the vicinity of the proposed injection wells that may be affected by an emergency at the project site (**Figure 10-3**) include:

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- Commercial Fishing
- Maritime Transportation
- Existing Wells/Well Platforms



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### 10.3 Potential Risk Scenarios

The following events related to BBE activities that could potentially result in an emergency response:

- Injection or monitoring well integrity failure
- Injection well monitoring equipment failure (e.g., shut-off valve or pressure gauge, etc.)
- Potential brine or CO<sub>2</sub> leakage to Texas State Waters
- Natural disaster
- Induced seismic event

The Emergency Response Organization (ERO) consists of the following teams.

- Facility Emergency Response Teams (FERTs): The FERT is responsible for organizing and managing at-the-site tactical response operations.
- Incident Management Team (IMT): The IMT is organized to carry out the following major functions: command, operations, planning, logistics, and finance.
- Crisis Management Team (CMT): The CMT is organized to provide support and guidance to the IMT for crisis communications, emergency response and business continuity operations.

These teams are supported by personnel and contractors based in the Houston Area. If needed, these teams can be supplemented by personnel and contractor resources located outside the region.

Resource personnel that are available and/or on call for emergency and response actions include but not limited to company employees and contractors from the following functional teams.

- Facilities
- Health, Safety and Environmental
- Communications / Corporate Affairs / Legal
- Well Source Control
- Finance / Procurement

Equipment used to implement response actions associated with an emergency and remedial response will vary, depending on the severity of the event. Response actions (cessation of injection, well shut-in, and evacuation) will generally not require specialized equipment to implement. Where specialized equipment and materials (such as a drilling rig, logging equipment, etc.) is required, the Operator will be responsible for its procurement.

To aid in the phased commitment of response resources, incidents/emergency events are classified by severity into three levels. Response actions will depend on the severity of the event(s) triggering an emergency response. Emergency events are categorized as shown in **Table 10-1**.

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**Table 10-1: Degrees of risk for emergency events.**

Emergency Condition	Definition
Major emergency	Event poses immediate substantial risk to human health, resources, or infrastructure. Emergency actions involving local authorities (evacuation or isolation of areas) should be initiated.
Moderate emergency	Event poses potential serious (or significant) near term risk to human health, resources, or infrastructure if conditions worsen or no response actions taken.
Minor emergency	Event poses no immediate risk to human health, resources, or infrastructure.

A major emergency requires the activation of an IMT and may also trigger the activation of the CMT. The CMT will be activated based on the support needs of the IMT.

**Table 10-2** provides guidance on the relationship that exists between the severity of an incident and the elements of the ERO that are most likely to respond to the incident.

**Table 10-2: BBE Emergency Response Organization, Levels of Response**

Severity	Levels of Response		
	FERT	IMT	CMT
Level 1: Minor	X		
Level 2: Moderate	X	X	
Level 3: Major	X	X	X

#### 10.4 Emergency Identification and Response Actions

Steps to identify and characterize the event will be dependent on the specific issue identified, and the severity of the event. The following potential risk scenarios identified are:

- Well integrity failure
- Injection well monitoring equipment failure
- Potential brine or CO<sub>2</sub> leakage to Texas State Waters
- Natural disaster
- Induced seismic event

##### 10.4.1 Well Integrity Failure

Integrity loss of the injection or monitoring well may endanger local resources within Texas State Waters. Integrity loss may have occurred if the following events occur:

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- Automatic shutdown devices are activated:

- Wellhead pressure exceeds the specified shutdown pressure specified in the permit.
- Annulus pressure indicates a loss of external or internal well containment.
- Mechanical integrity test results identify a loss of mechanical integrity.

Response actions:

- Immediately notify the BBE facility supervisor or delegate.
- Notify the UIC Program Director within 24 hours of the emergency event, per 40 CFR 146.91(c).
- The facility supervisor will make an initial assessment of the incident and Level and activate the ERO (FERT, IMT, and/or CMT), as applicable.
- Determine the severity of the event, based on the information available, within 24 hours of notification.
- The ERO will work with subject matter experts (SMEs) to make a final decision on the Level of the incident, based on the information available, within 24 hours of notification.
- For a Level 1 Incident
  - Conduct assessment to determine whether there has been a loss of mechanical integrity.
  - If there has been a loss of mechanical integrity:
    - Shut in well (close flow valve), if applicable.
    - Vent CO<sub>2</sub> from surface facilities, if applicable.
    - Monitor well pressure, temperature, and annulus pressure to verify integrity loss and determine the cause and extent of failure; identify and, if necessary, implement appropriate remedial actions (in consultation with the UIC Program Director).
- For a Level 2 or 3 Incident:
  - Shut in well (close flow valve), if applicable.
  - Vent CO<sub>2</sub> from surface facilities, if applicable.
  - Limit access to authorized personnel only.
  - Communicate with BBE personnel and local authorities to initiate evacuation plans, as necessary.
  - Monitor well pressure, temperature, and annulus pressure to verify integrity loss and determine the cause and extent of failure; identify and implement appropriate remedial actions to repair damage to the well (in consultation with the UIC Program Director).
  - If contamination is detected, identify, and implement appropriate remedial actions (in consultation with the UIC Program Director).

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#### 10.4.2 Injection Well Monitoring Equipment Failure

The failure of monitoring equipment for wellhead pressure, temperature, and/or annulus pressure may indicate a problem with the injection well that could endanger local resources within Texas State Waters.

Response actions:

- Immediately notify the BBE facility supervisor or delegate.
- Notify the UIC Program Director within 24 hours of the emergency event, per 40 CFR 146.91(c).
- The facility supervisor will make an initial assessment of the incident and Level and activate the ERO (FERT, IMT, and/or CMT), as applicable.
- The ERO will work with SMEs to make a final decision on the Level of the incident, based on the information available, within 24 hours of notification.
- For a Level 1 Incident
  - Conduct assessment to determine whether there has been a loss of mechanical integrity.
  - If there has been a loss of mechanical integrity:
    - Shut in well (close flow valve), if applicable.
    - Vent CO<sub>2</sub> from surface facilities, if applicable.
    - Monitor well pressure, temperature, and annulus pressure to verify integrity loss and determine the cause and extent of failure; identify and, if necessary, implement appropriate remedial actions (in consultation with the UIC Program Director).
- For a Level 2 or 3 Incident:
  - Shut in well (close flow valve), if applicable.
  - Vent CO<sub>2</sub> from surface facilities, if applicable.
  - Limit access to authorized personnel only.
  - Communicate with BBE personnel and local authorities to initiate evacuation plans, as necessary.
  - Monitor well pressure, temperature, and annulus pressure to verify integrity loss and determine the cause and extent of failure; identify and implement appropriate actions to repair damage to the well (in consultation with the UIC Program Director).
  - If contamination is detected, identify, and implement appropriate remedial actions (in consultation with the UIC Program Director).

#### 10.4.3 Potential Brine or CO<sub>2</sub> Leakage to Texas State Waters

Elevated concentrations of indicator parameter(s) in groundwater sample(s) or other evidence of fluid (brine) or CO<sub>2</sub> leakage to Texas State Waters.

Response actions:

- Immediately notify the BBE facility supervisor or delegate.
- Notify the UIC Program Director within 24 hours of the emergency event, per 40 CFR 146.91(c).

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- The facility supervisor will make an initial assessment of the incident and Level and activate the ERO (FERT, IMT, and/or CMT), as applicable.
- The ERO will work with SMEs to make a final decision on the Level of the incident, based on the information available, within 24 hours of notification.
- For all incidents (Levels 1, 2, or 3):
  - Shut in well (close flow valve), if applicable.
  - Vent CO<sub>2</sub> from surface facilities, if applicable.
  - Collect confirmation sample(s) of groundwater and analyze indicator parameters.
  - If the presence of indicator parameters is confirmed, develop (in consultation with the UIC Program Director) a case-specific work plan to:
    - Install additional monitoring points, if needed, near the impacted area to delineate the extent of impact, and
    - Evaluate impacts to the Texas State Waters.
    - Proceed with efforts to mitigate and remediate unsafe conditions.
    - Continue monitoring and remediation on a frequent basis (frequency to be determined by the Operator and the UIC Program Director) until unacceptable adverse impact has been fully addressed.

#### 10.4.4 Natural Disaster

Well problems (integrity loss, leakage, or malfunction) may arise because of a natural disaster impacting normal operations at the site. An earthquake may disturb surface and/or subsurface facilities; and weather-related disasters (e.g., tornado, hurricane, or lightning strike) may impact surface facilities that initiate the response actions below.

Response actions:

- Immediately notify the BBE facility supervisor or delegate.
- Notify the UIC Program Director within 24 hours of the emergency event, per 40 CFR 146.91(c).
- The facility supervisor will make an initial assessment of the incident and Level and activate the FERT, IMT, and/or CMT, as applicable.
- The ERO will work with SMEs to make a final decision on the Level of the incident, based on the information available, within 24 hours of notification.
- For a Level 1 incident:
  - Conduct assessment to determine whether there has been a loss of mechanical integrity.
  - If there has been a loss of mechanical integrity:
    - Shut in well (close flow valve), if applicable.
    - Vent CO<sub>2</sub> from surface facilities, if applicable.
    - Limit access to authorized personnel only.
    - Monitor well pressure, temperature, and annulus pressure to verify integrity loss and determine the cause and extent of any failure.
    - Identify and, if necessary, implement appropriate remedial actions (in consultation with the UIC Program Director).

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- For a Level 2 or 3 incident:

- Shut in well (close flow valve), if applicable.
- Vent CO<sub>2</sub> from surface facilities, if applicable.
- Limit access to authorized personnel only.
- Communicate with BBE personnel and local authorities to initiate evacuation plans, as necessary.
- Monitor well pressure, temperature, and annulus pressure to verify well status and determine the cause and extent of any failure.
- Determine if any leaks to Texas State Waters occurred.
- If impact or endangerment is detected, identify, and implement appropriate remedial actions (in consultation with the UIC Program Director).

#### 10.4.5 Induced Seismic Event

Based on the project subsurface and operating conditions, it is highly unlikely that injection operations would induce a seismic event outside a 4-mile radius from the wellhead. Therefore, this portion of the response plan is developed for any seismic event with an epicenter within a 4-mile radius of the injection well.

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**Table 10-3** provides a summary of operating states, probable incident level, threshold conditions, and response actions. The operating state corresponds to threshold criteria that in turn corresponds to the site's potential risk and level of seismic activity and corresponding response actions. The actual incident Level will be evaluated and determined at the time of the event.

Based on the periodic analysis of the monitoring data, observed level of seismic activity, and local reporting of felt events, the site will be assigned an operating state. The operating state is determined using threshold criteria which correspond to the site's potential risk and level of seismic activity. The operating state provides operating personnel information about the potential risk of further seismic activity and guides them through a series of response actions.

The seismic monitoring system structure is presented in **Table 10-3**. The table corresponds to each level of operating state with the threshold conditions and operational response actions.



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**Table 10-3:** Bayou Bend Induced Seismicity Response Actions<sup>5</sup>

Operating State	Probable Incident Level <sup>6</sup>	Threshold Condition	Response Action
<b>Green</b>	Not applicable	Seismic events <sup>7</sup> less than or equal to M 1.5	<ul style="list-style-type: none"> <li>Continue normal operation.</li> <li>Monitor and record seismic activity at regular intervals until baseline conditions are restored.</li> </ul>
<b>Yellow</b>	Level 1	Five or more seismic events within a 30-day period having a magnitude greater than M 1.5 but less than or equal to M 2.0	<ul style="list-style-type: none"> <li>Continue site activities per permit conditions.</li> <li>Activate FERT to monitor operational performance and identify issues of potential concern.</li> <li>Within 24 hours of the incident, notify the UIC Program Director.</li> <li>Monitor and record seismic activity at regular intervals until baseline conditions are restored.</li> </ul>
<b>Orange</b>	Level 1 or 2	<p>Seismic event greater than M 1.5, but less than M 2.0 AND local observation or “felt” report;<sup>8</sup> OR</p> <p>Seismic event greater than or equal to M 2.0 with no local observation or “felt” report.</p>	<ul style="list-style-type: none"> <li>Continue site activities per permit conditions.</li> <li>Activate FERT to monitor operational performance and identify issues of potential concern.</li> <li>Within 24 hours of the incident, notify the UIC Program Director.</li> <li>Initiate corrective actions and, if applicable, implement Level 2 protocols by activating the IMT.</li> <li>Monitor and record seismic activity at regular intervals until baseline conditions are restored or through the period of corrective action (as applicable), until baseline conditions are restored.</li> <li>Report findings to UIC Program Director within 25 business days of initial notification.</li> </ul>

<sup>5</sup> Assumed operating baseline is less than or equal to an M 1.0 seismic event.

<sup>6</sup> The actual incident level will be evaluated and determined at the time of the event.

<sup>7</sup> Seismic event to be measured and detected within a 4-mile radius of the injection well.

<sup>8</sup> Confirmed by local reports of felt ground motion or reported on the USGS “Did You Feel it?” reporting system at: <https://www.usgs.gov/data/did-you-feel-it>



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Red	Level 2 or 3	Seismic event greater than M 2.0, AND Local observation or “felt” report and/or reports of damage.	<ul style="list-style-type: none"> <li>• Assess situation and implement either Level 2 or Level 3 protocols based on available information (i.e., activate FERT, IMT, and notify or activate CMT).</li> <li>• Restrict site access to authorized personnel.</li> <li>• Within 24 hours of the incident, notify UIC Program Director.</li> <li>• Monitor operational performance and identify issues of potential concern.</li> <li>• Initiate corrective actions as follows:               <ul style="list-style-type: none"> <li>— Monitor well pressure, temperature, and annulus pressure to verify well status and determine the cause and extent of any failure; identify and implement appropriate remedial actions (in consultation with the UIC Program Director).</li> <li>— Determine if leaks to Texas State Waters occurred.</li> <li>— Monitor and record seismic activity at regular intervals until baseline conditions are restored or through the period of corrective action (as applicable), until baseline conditions are restored.</li> <li>— Report findings to UIC Program Director within 25 business days of initial notification.</li> </ul> </li> </ul>
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## 10.5 Response Personnel and Equipment

Site personnel, project personnel, and local authorities will be relied upon to implement this ERRP.

Site personnel to be notified (not listed in order of notification):

1. BBE Operations Manager
2. BBE Facility Supervisor
3. BBE Health, Safety and Environmental Manager
4. BBE Project Engineer(s)
5. BBE Corporate Communications
6. BBE Operating Committee Members

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

**Table 10-4: Contact Information for Key Local, State, and Other Authorities**

Agency	Phone Number
Beaumont Police Department	911 or 409-832-1234
Taylor Landing Police Department	911 or 512-352-5551
Texas State Police	911 or 855-492-3244
Texas State Emergency Response Commission	211 or 877-541-7905
Environmental Services Contractor (ERM)	713-775-4505
Emergency Response Contractor (E3 Environmental)	844-333-0939
UIC Program Director, Region 6 EPA	214-665-7252
EPA National Response Center (24 hours)	800-424-8802
Texas Geological Survey	512-471-0140
U.S. Army Corps of Engineers, Galveston Division	409-766-3800
U.S. Coast Guard	361-749-5217
Texas General Land Office	512-784-2640
U.S. Fish and Wildlife Service, Humble, Texas	281-230-7225
U.S. Fish and Wildlife Service, Liberty, Texas	936-336-9786
U.S. Fish and Wildlife Service (Austin Field Office)	512-937-7371
Texas Parks and Wildlife, Coastal Fisheries Field Office, Sabine Lake Ecosystem	409-983-1104
Texas Parks and Wildlife, Coastal Fisheries Field Office, Galveston Bay Ecosystem	281-534-0110
National Marine Fisheries Service, Galveston, Texas	409-766-3500
University of Texas Medical Branch, Galveston, Texas	409-772-9505
Memorial Hermann Texas Medical Center, Houston, Texas	713 704-4000
Christus Southeast Texas, Beaumont, Texas	409-892-7171

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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, BBE shall be responsible for its procurement.

## 10.6 Emergency Communications Plan

BBE has developed a Stakeholder Engagement and Communication Plan and will be responsible for issuing public communications regarding emergency response events. Communications will be bilingual dependent on local community population, if needed, and phrased in understandable (“plain language”) terms. The objective is to clearly communicate what happened and if there are any environmental or safety implications. The amount of information, timing, and communications method(s) will be appropriate to the event, its severity, including but not limited to potential or actual impacts to drinking water or other environmental resources, including impacts to the surrounding community.

BBE will describe what happened, any impacts to the environment or other local resources, what responses were taken, and the status of the response. For responses that occur over the long-term (e.g., ongoing cleanups), BBE will provide periodic updates on the progress of the response action(s).

BBE will communicate with entities who may need to be informed about or respond to the event, including local water systems, CO<sub>2</sub> source(s) and pipeline operators, landowners, and regional or other response teams.

### 10.6.1.1 Communication Protocols

The Communications Plan includes communication protocols to enable effective and organized communication and timely action. Communication over the networks is regulated through these protocols. A protocol not only defines who will talk to whom over a network, but also specifies what they will talk about and when.

The Communications Plan provides for communication of information on the nature and status of FERT response operations and the IMT and CMT members. All media inquiries will be directed to BBE external and media communications at: [info@bayoubend.com](mailto:info@bayoubend.com).

The timing and content of routine updates will vary depending on the nature and status of the emergency and could include any or all of the following topics:

- Status of personnel (i.e., people on-site, unaccounted for, accounted for, injured, etc.)
- Status of source
- Incident weather
- Changes in organization / assignments
- Location(s) of muster and/or shelter areas
- Location(s) of staging area(s), if established
- Available resources by staging area, if established
- Location of the isolated areas
- Results of site characterizations, particularly from air sampling

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- 1       •       Location of decontamination area(s)
- 2       •       Protective personnel equipment (PPE) requirements
- 3       •       Progress/problems being addressed by response teams
- 4       •       Specific needs

## 5   **10.7 Plan Review**

6   The ERRP shall be reviewed:

- 7       •   At least once every five (5) years following its approval by the permitting agency;
- 8       •   Within one (1) year of an area of review (AOR) re-evaluation;
- 9       •   Within 90 business days following any significant changes to the injection process or the injection
- 10       facility, or an emergency event; or
- 11       •   As required by the permitting agency.

12   If the review indicates that no amendments to the ERRP are necessary, BBE will provide the permitting

13   agency with the documentation supporting the “no amendment necessary” determination.

14   If one of the reviews listed above indicates that amendments to the ERRP are necessary, amendments shall

15   be made and submitted to the permitting agency within 90 business days following an event that initiates

16   the ERRP review procedure.

## 17   **10.8 Staff Training and Exercise Procedures**

18   BBE will include ERRP training into all onboarding training for employees fit-for purpose. Visitors and

19   occasional workers will receive site-specific training as warranted. Facility response personnel will receive

20   more in-depth training, including detailed emergency response procedures. Desktop or actual drills using

21   different and most probable emergency scenarios shall be conducted at least once per calendar year.

22   Periodic refresher training will be provided, not less than annually, to well operators, facility safety and

23   environmental personnel, the facility manager, facility supervisor, and corporate communications. The

24   training plan will document that the above listed personnel have been trained and possess the required skills

25   to perform their relevant emergency response activities described in the ERRP.

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**10.9 Additional Information**

**10.9.1 Underground Sources of Drinking Water**



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1    **10.9.2 Acronyms**

2	AOR	Area of Review
3	BAT	best available technologies
4	BBE	Bayou Bend East SL20220050
5	BBE-P1	Bayou Bend East SL20220050 – Phase 1
6	BGS	below ground surface
7	CCS	carbon transport and sequestration
8	CMT	crisis management team
9	CO <sub>2</sub>	carbon dioxide
10	DAS	Distributed acoustic sensing
11	EFH	Essential fish habitat
12	ERM	Environmental resources management
13	ERO	Emergency response organization
14	ERRP	Emergency Response Plan
15	FERT	facility emergency response teams
16	IMT	incident management team
17	NMFS	National Marine Fisheries Service
18	PISC	Post-injection Site Care
19	PPE	Protective Personnel Equipment
20	SME	Subject Matter Expert
21	TDS	total dissolved solids
22	UIC	Underground Injection Control
23	USDW	underground sources of drinking water
24	USFWS	United States fish and wildlife service
25	USGS	United States Geological Survey