

UIC CLASS VI GEOLOGIC STORAGE OF CO₂ PERMIT APPLICATION

Loving CCS Hub

Loving County, Texas

Section 12: Environmental Justice

Prepared for:

EPA Region 6
Underground Injection Control Section

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12.0 ENVIRONMENTAL JUSTICE

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

Milestone has prepared this EJ Screening Report (the Report), using EPA EJSCREEN, EPA's Environmental Justice Screening and Mapping Tool (<https://eiscreen.epa.gov/mapper/>), to review any potential impacts to EJ within the carbon dioxide plume area/project AoR. [REDACTED]

Milestone, with guidance from EPA, [REDACTED] UIC department, selected a 5-mile radius around the proposed Well for EJ screening.

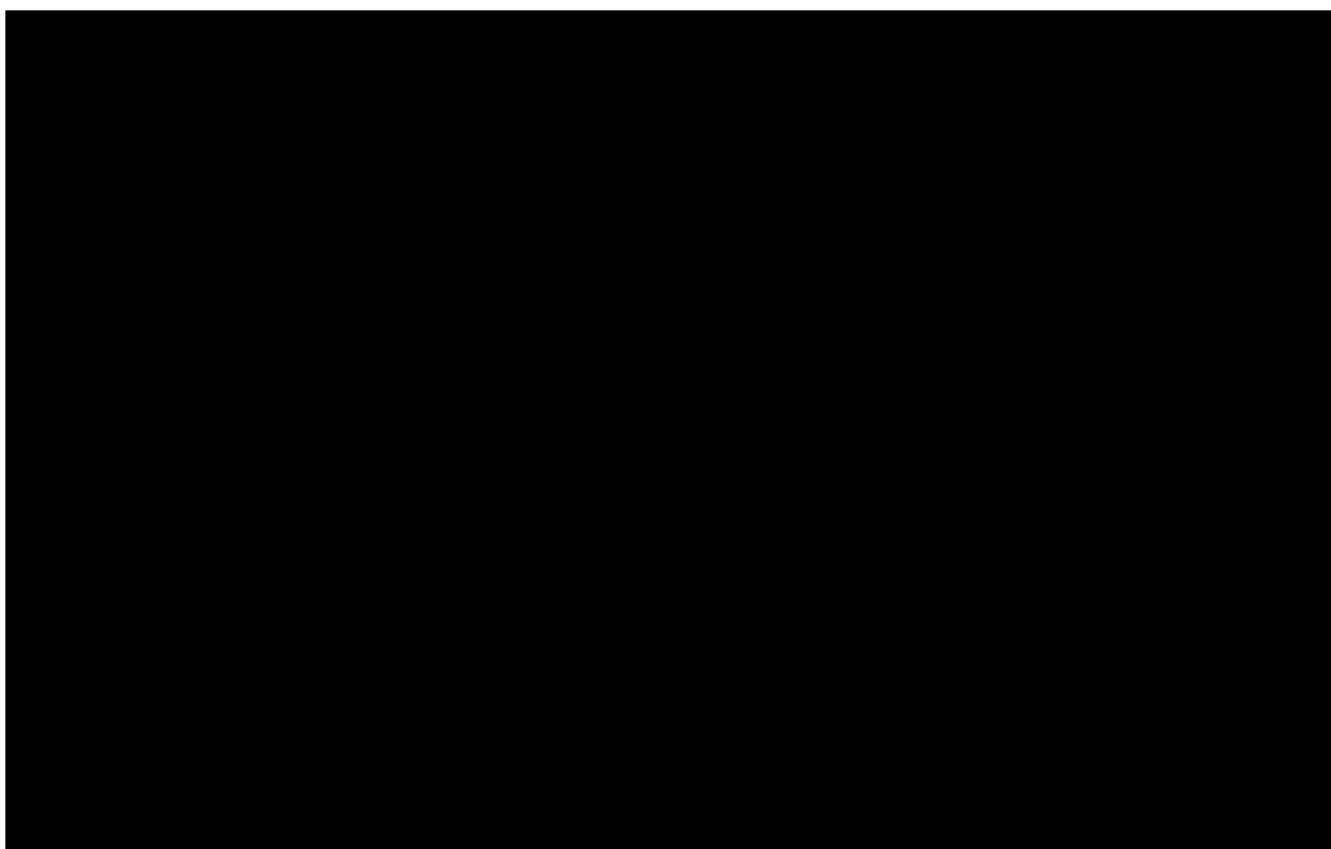
Consideration and guidance, as per the EPA memorandum on Environmental Justice Guidance for UIC Class VI Permitting and Primacy, dated 17 August 2023, was used to develop this permit application. Milestone will work collaboratively and proactively with the EPA, the State of Texas, and any local partners to facilitate consideration and application of this guidance in our UIC permitting actions.

12.1 2020 Census Population and Race Data

Figure 12-1 displays

Table 12-1 depicts

Table 12-1: 2020 Census P1 Race Data for Loving County, Texas



12.2 Environmental Justice Screen ACS Report Results

Milestone downloaded the EJ Screen Report using the EPA tool for each Injection Well with [REDACTED]. After reviewing the data for each well, [REDACTED]

The EJ Census (2020) Summary Report indicated the population within the [REDACTED]

[REDACTED] The first page of the ACS report may be viewed in **Figure 12-2**.

The ACS Report indicates seven (7) of the ten (10) people have an education attainment between [REDACTED]

[REDACTED] **Figure 12-3** shows the second page of the ACS summary report. The third page of the ACS Summary report is included in **Figure 12-4**; [REDACTED]

[REDACTED] 66 sq miles in a 5-mile radius, it is 78.5398 sq. miles to be precise. Milestone corrected the values using percentages.

12.3 EJScreen Report

The EJScreen Report includes [REDACTED] EJ Indexes that combine environmental and socioeconomic indicators. Reports were run for [REDACTED]

[REDACTED] The

EJ Indexes are as follows:

- 1) Particulate Matter 2.5
- 2) Ozone
- 3) Nitrogen Dioxide (NO₂)
- 4) Diesel Particulate Matter
- 5) Toxic Releases to Air
- 6) Traffic Proximity
- 7) Lead Paint
- 8) Superfund Proximity
- 9) RMP Facility Proximity
- 10) Hazardous Waste Proximity
- 11) Underground Storage Tank (UST) Proximity
- 12) Wastewater Discharge
- 13) Drinking Water Non-Compliance

[REDACTED]

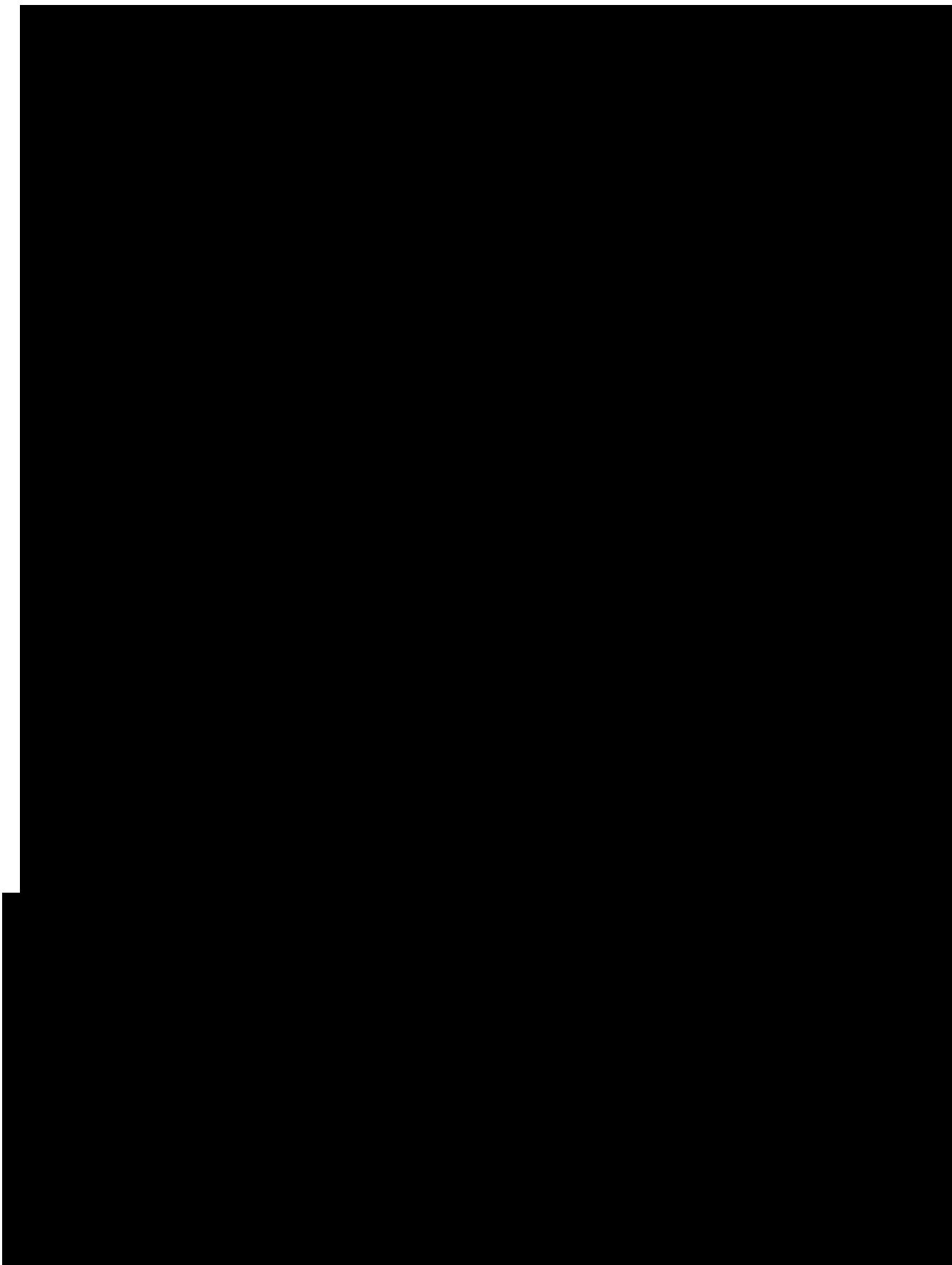
[REDACTED]

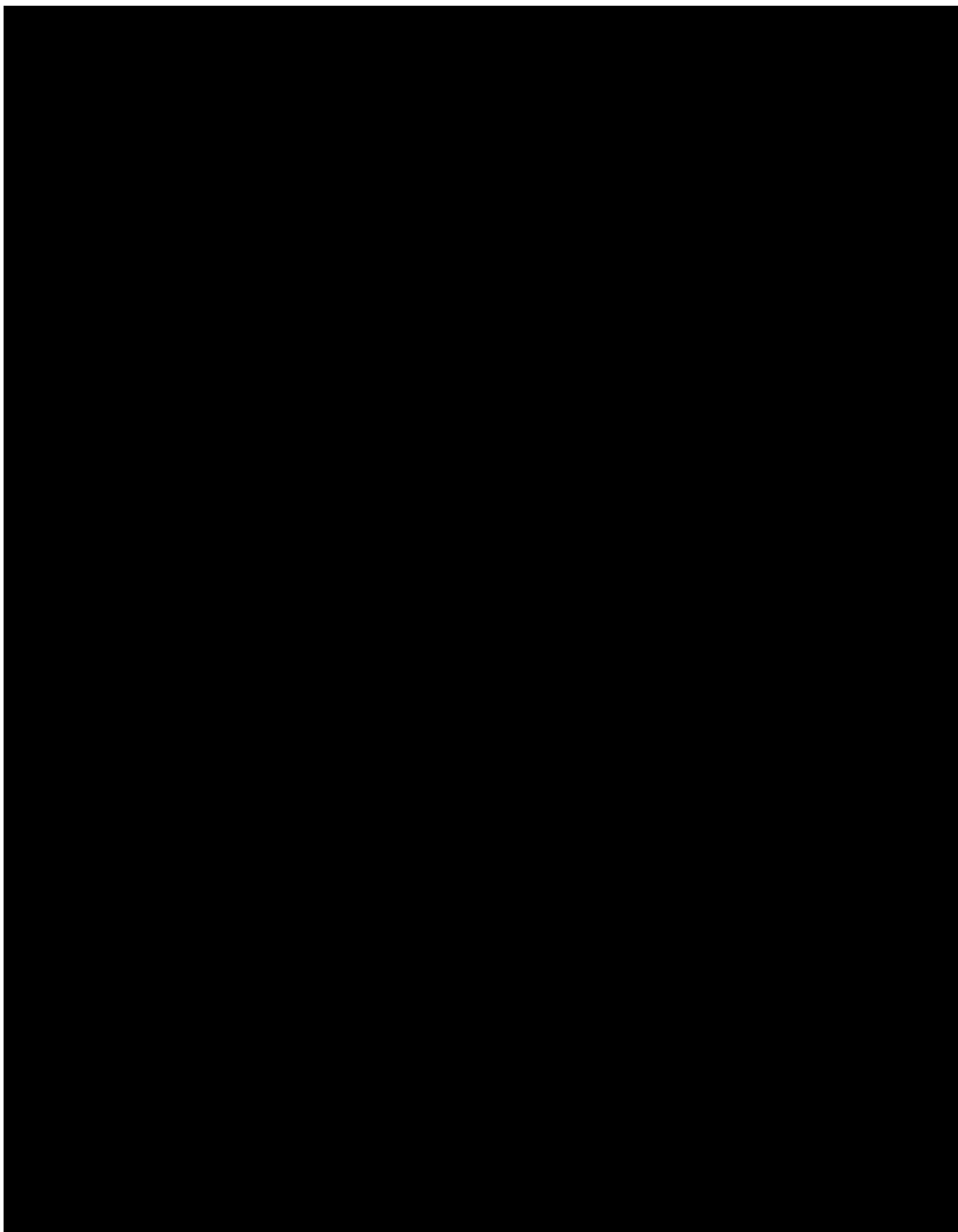
[REDACTED]

[REDACTED] A copy of the
EJScreen Report is included in Figures 12-5 to Figure 12-8.

In reviewing the pollution risk sources from the EJScreen Report, the development and operation of the proposed well will benefit the immediate population by sequestering carbon dioxide, and other gasses from natural gas processing facilities/oil and gas activities, which would otherwise be emitted into the atmosphere.

[REDACTED]





12.4 EJ Memo Responses

Pursuant to the EPA Memorandum on Environmental Justice Guidance for UIC Class VI Permitting and [REDACTED]

12.4.1 Environmental and Social Risk Management

Milestone's approach to risk management

This process will allow us to continue analyzing and identifying any emerging risks regarding Environmental Justice in our future projects (Fig. 12-9).

12.4.2 Stakeholder Engagement

We recognize the influence our operations can have on the environment and communities, and we understand the importance of actively considering issues important to our stakeholders in our decision-making processes.

Figure 12-10



12.4.3 Identify Communities with Potential EJ Concerns

Milestone has reviewed census data, EJSCREEN data, interviewed residents/landowners and contacted local community leaders regarding the proposed project. Milestone has met with [REDACTED]

[REDACTED] with potential EJ concerns – to help ensure proactive community engagement and promote the just treatment and meaningful involvement of the affected community in UIC permitting actions.

12.4.4 Enhance Public Involvement

Milestone is committed to implementing an inclusive public participation process to enhance community engagement. [REDACTED]

12.4.5 Enhance Transparency Throughout the Permitting Process

Milestone is committed to a transparent permitting process with the EPA and Texas State Regulators such as the Railroad Commission of Texas (RRC) and Texas Commission on Environmental Quality (TCEQ).

Milestone will make data and reports available to the general public to promote awareness and show that permanent CO₂ sequestration is safe, effective and does not harm USDWs, the environment, or human health.

12.4.6 Minimize Adverse Effects to USDWs and Communities We Serve

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

12.5 Conclusions

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

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

Furthermore, the development of an MRV Plan (Subpart RR Monitoring, Reporting, and Verification Plan – Greenhouse Gas Reporting Program, 40 CFR Part 98), will help ensure the safety and continuous review of activities within the Project.