

**APPENDIX 7.A QUALITY ASSURANCE AND SURVEILLANCE PLAN
40 CFR 146.90 (k)**

CASS SEQUESTRATION

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Well name:

[REDACTED]

Well location:

CASS COUNTY, IN

[REDACTED]

This Quality Assurance and Surveillance Plan (QASP) is approved for use and implementation at the Cass Sequestration project. The signatures below denote the approval of this document and intent to abide by the procedures outlined within it.

Signature

Date

Maureen Bennett
Senior Environmental Engineer at Cass Sequestration

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Distribution List

The following project participants (**Table 1**) will receive the completed Quality Assurance and Surveillance Plan (QASP) and all future updates for the duration of the project. The Operations Director at Cass Sequestration will be responsible for ensuring that all of those on the distribution list receive the most current copy of the approved QASP.

Name	Organization	Project Role (s)	Contact Information (email / telephone)
Maureen Bennett	Cass Sequestration	Senior Environmental Engineer	Maureen.bennett@dteenergy.com 313-548-8154 One Energy Plaza, 400 WCB, Detroit, MI 48226
Gregg Russell	Cass Sequestration	Vice President	Gregg.russell@dteenergy.com 313-235-7577 One Energy Plaza, 400 WCB, Detroit, MI 48226

Table 1: Distribution list.

A Project Management

A.1. Project/Task Organization

A.1.1 Key Individuals and Responsibilities

The project will be led by Cass Sequestration, LLC (“Cass Sequestration”) which will retain the services of qualified contractors and subcontractors. The performance of the Testing and Monitoring Plan will be shared between Cass Sequestration and the designated contractors. This QASP describes the methods used to perform the activities listed in the Testing and Monitoring Plan.

The key roles and responsibilities of the personnel involved in the implementation of the Testing and Monitoring Plan are listed in **Table 2**.

Role	Responsibility
Project Manager	The Project Manager (PM) plays a central role in the implementation of all data gathering and analysis for the project and provides overall coordination and responsibility for all organizational and administrative aspects. The PM is responsible for the planning, funding, schedules, and controls needed to implement project plans and ensure that project participants adhere to the plan.
Quality Representative	The role of the Quality Representative (QR) is to identify quality-affecting processes and to monitor compliance with project requirements. The QR is responsible for establishing and maintaining the project quality assurance plans and monitoring project staff compliance with them. The QR is responsible for ensuring that this QASP meets the project’s quality assurance requirements.
Monitoring, Verification, and Accounting Task Lead	Well testing and monitoring activities are the responsibility of the Monitoring, Verification, and Accounting (MVA) Task Lead. The MVA Task Lead is responsible for developing, maintaining, and updating all well testing and monitoring plans, including this QASP.
Subject Matter Experts (SMEs)/Subtask Task Leads	The role of the SMEs is to develop testing and monitoring plans, to collect environmental data specified in those plans using best practices, and to maintain and update those plans as needed. The SMEs, assisted by the MVA Task Lead, are responsible for planning, collecting, and ensuring the quality of testing and monitoring data and managing all necessary metadata and provenance for these data. The SMEs are also often responsible for data analysis, data products and acquisition of independent data quality/peer reviews. The SMEs will be involved in the project as needed.

Table 2: Key roles and responsibilities.

A.1.2 Independence from Project QA Manager and Data Gathering

To ensure quality assurance (QA), the sample collection process, data analysis and processing will be performed or witnessed by independent third parties outside the management structure in most cases.

A.1.3 QA Project Plan Responsibility

Cass Sequestration will be responsible for maintaining and distributing the official, approved QASP and will periodically review this QASP and consult with EPA or its delegated primacy agency when changes to the plan are desired or required.

A.1.4 Organizational Chart for Key Project Personnel

Figure 1 shows the organizational structure of the Cass Sequestration project. They will provide a contact list of individuals fulfilling these roles to the Underground Injection Control (UIC) Program Director, if required.

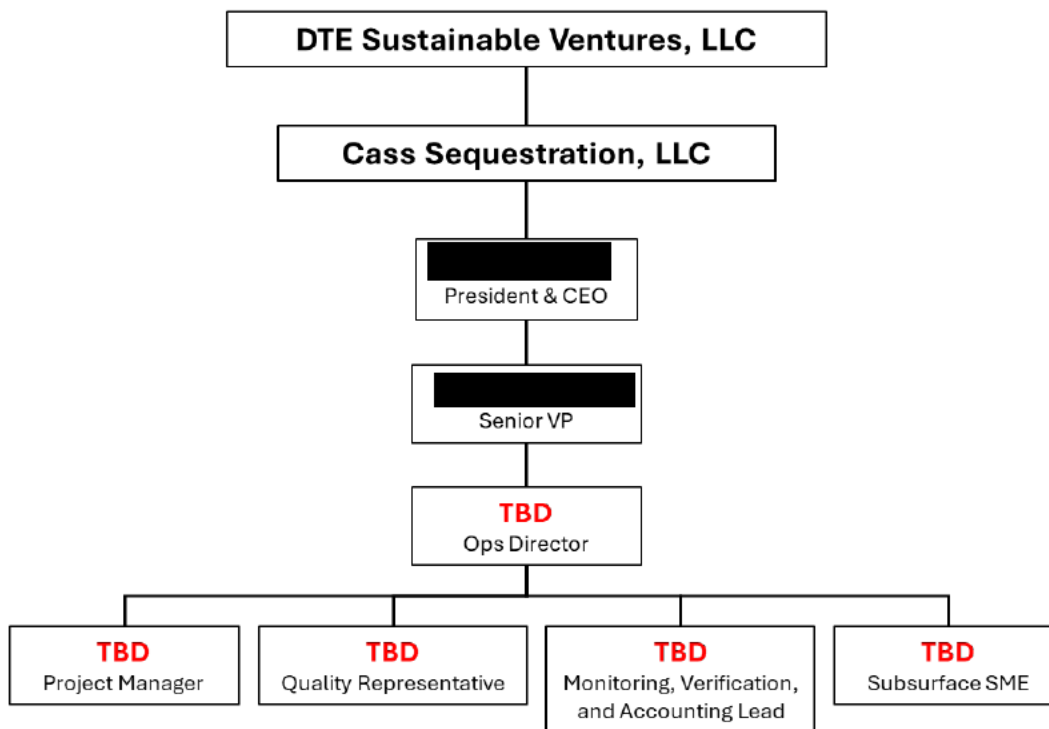


Figure 1: Cass Sequestration organization structure.

A.2. Problem Definition/Background

A.2.1 Reasoning

The goals of Permit Section 7.0 - Testing and Monitoring Plan include:

- Protecting underground sources of drinking water (USDWs)
- Meeting the regulatory requirements of 40 CFR 146.90
- Ensuring that the injection well is operating as planned
- Providing data to validate and calibrate the geological and dynamic models used to predict the distribution of carbon dioxide (CO₂) within the storage formation
- Supporting Area of Review (AoR) re-evaluations over the course of the project

These objectives will be met through the collection of pressure/temperature data within and above the storage formation, the collection of groundwater and fluid samples from monitoring wells, wireline logging, pressure/temperature measurements in the tubing and tubing-casing annular space of the injection well and monitoring wells, sample collection/analysis of the injection stream, and geophysical monitoring.

This QASP was developed to ensure the quality standards of the Testing and Monitoring Plan to meet the requirements of the EPA UIC Program for Class VI wells.

A.2.2 Reasons for Initiating the Project

The objective of the Cass Sequestration project is to sequester and inject CO₂ safely and permanently in the storage formation. The Testing and Monitoring Plan for this project has been designed to confirm the safe and permanent storage of the CO₂ within the intended storage formation.

A.2.3 Regulatory Information, Applicable Criteria, Action Limits

US EPA regulation 40 CFR 146 Subpart H requires owners or operators of Class VI wells to monitor several parameters over the life of the project to ensure that:

- Mechanical integrity of the injection well is maintained
- Fluid movement and the extent of associated pressure elevation are within the limits described in the permit application
- USDWs are not endangered

Monitoring activities include mechanical integrity tests (MITs), pressure fall-off (PFO) tests during the injection phase of the project, monitoring of shallow and deep groundwater quality, and tracking the development of the CO₂ plume and associated pressure front. This document details the measurements that will be required as well as the steps used to ensure that the quality of all data is such that it can be used in the decision-making process over the life of the project.

A.3. Project/Task Description

A.3.1 Summary of Work to be Performed and Work Schedule, see Table 7.1 in 7.0 Testing and Monitoring Plan document.

Table 3 and **Table 4** describe testing and monitoring tasks, reasoning, responsible parties, and locations.

Activity	Location(s)	Method	Analytical Technique	Lab/ Custody	Purpose
CO ₂ stream analysis	CO ₂ Delivery Pipeline	Direct sampling	Laboratory analysis	TBD	Monitor injectant
Injection mass rate and volume	Injection Wellhead	Flow meter	Direct measurement	N/A	Monitor injection rate and volume
Injection pressure	Injection Wellhead and downhole	Pressure sensor	Direct measurement	N/A	Monitor injection pressure
Annular pressure	Injection Wellhead and downhole	Pressure sensor	Direct measurement	N/A	Wellbore integrity
Storage formation pressure	IZM Well and injection well	Downhole sensor	Direct measurement	N/A	Monitor storage formations
Corrosion monitoring	Pipeline	Coupon	Laboratory analysis	TBD	Wellbore integrity
Temperature Log	Injection well		Direct measurement	N/A	CO ₂ plume development, well Integrity
Temperature Log	AZM well and IZM well	Wireline	Indirect measurement	N/A	CO ₂ plume development, well Integrity
Pressure fall-off testing	Injection Well	Pressure sensor	Direct measurement	N/A	Reservoir evaluation
Seismicity monitoring	Surface monitoring stations	Seismometer stations	Indirect measurement	N/A	Pressure plume development, confining formation integrity
	Surface		Indirect measurement	N/A	CO ₂ plume development, verify containment

Table 3: Summary of testing and monitoring schedule.

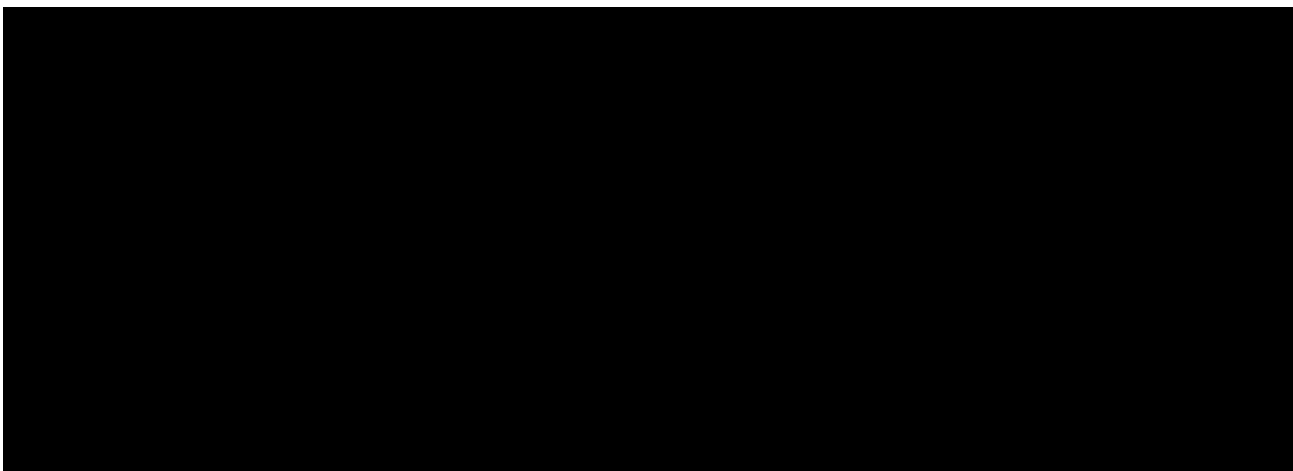
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Table 4: Summary of direct geochemical measurements.

A.3.2 Geographic Locations

Figure 2 shows the Cass Sequestration project site.

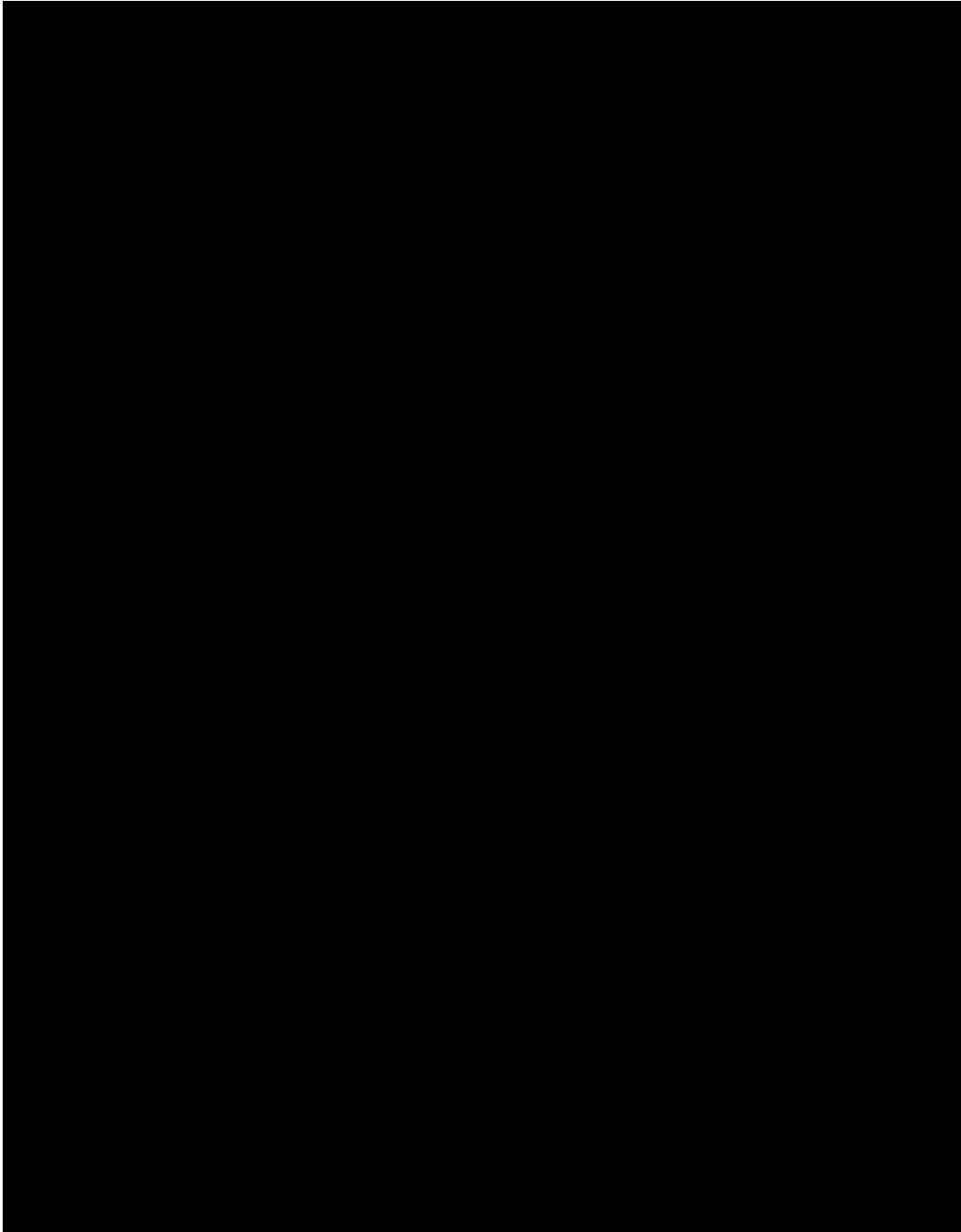


Figure 2: Map of Cass Sequestration project showing injection well [REDACTED], In Zone (IZM-1) and Above Zone (AZM-1) monitor wells, conceptual location of seismicity stations and AoR. The satellite base image is unaltered and includes all required components of 40 CFR 146.82(a)(2).

A.3.3 Resource and Time Constraints

Cass Sequestration proposes an alternative post injection site care (PISC) phase of 5 years (see Section 9.0 PISC and Site Closure Plan). Computer Modelling Group (CMG-GEM) simulations will be run throughout the project life and matched with actual field data collected under the Testing and Monitoring Plan. The simulations and field testing during the active injection period of the project will confirm that plume stability modeling will be accurate throughout the 5-year PISC period.

A.4. Quality Objectives and Criteria

A.4.1 Performance/Measurement Criteria

The overall QA objective for the Testing and Monitoring Plan is to develop and implement procedures to monitor the CO₂ injection system, development of the CO₂ plume and associated pressure front, and to confirm that CO₂ or other fluids have not migrated beyond the storage formation. This objective will be accomplished through the implementation of the methods provided in **Table 3** and **Table 4**. The tables below (**Table 5** to **Table 13**) detail the specific performance and measurement criteria for each testing and monitoring output.

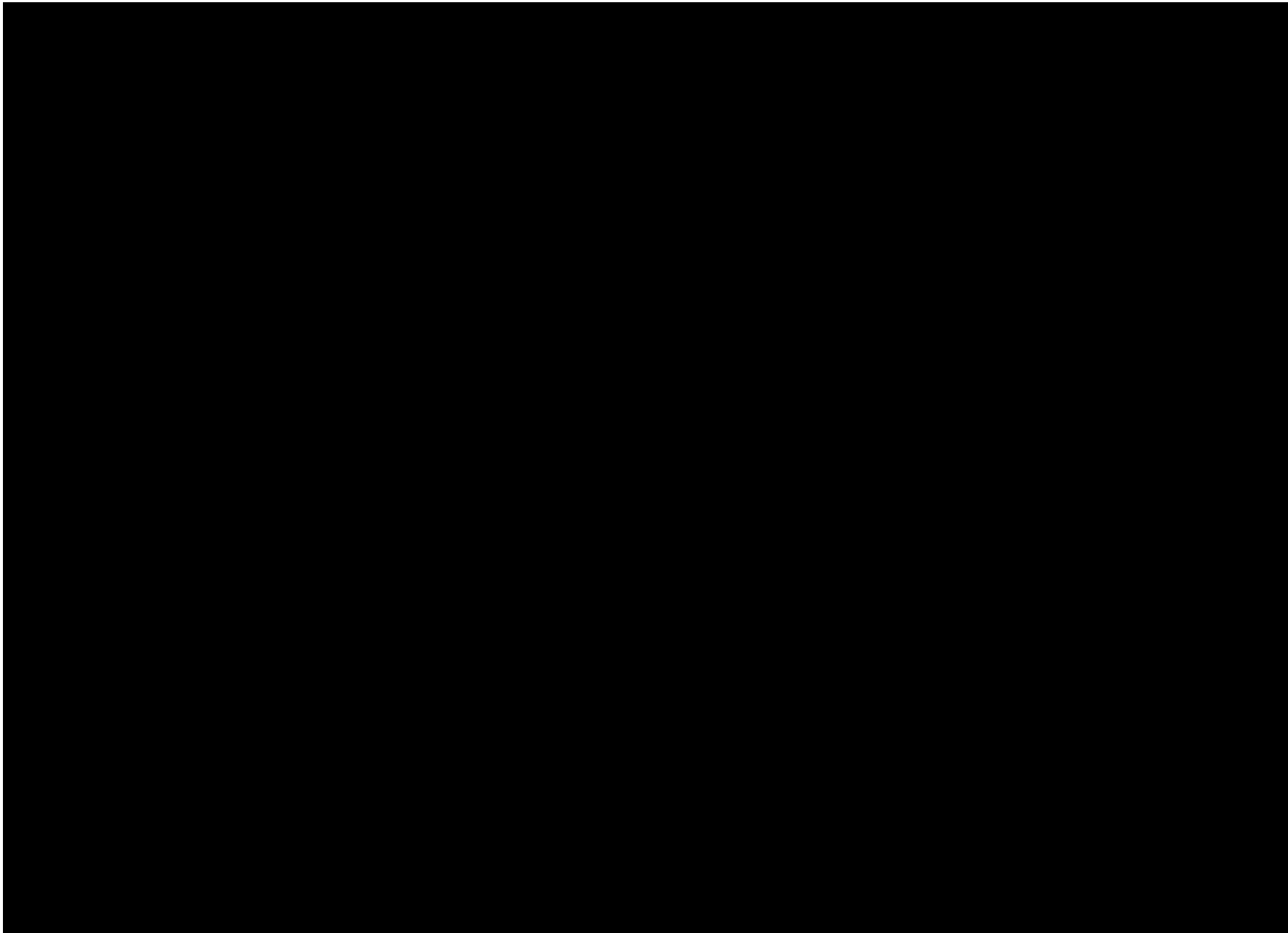


Table 5: Summary of analytical and field parameters for groundwater samples.

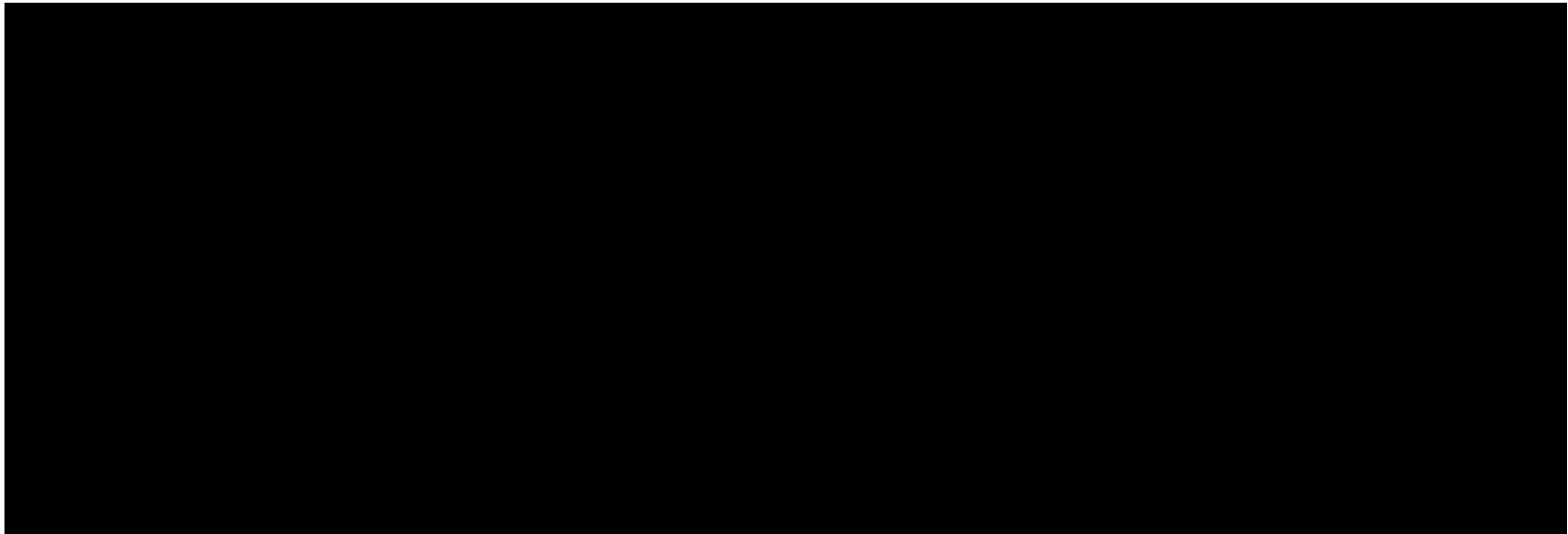
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Table 6: Summary of analytical parameters for CO₂ gas stream. All analysis will be performed by a certified third-party laboratory.

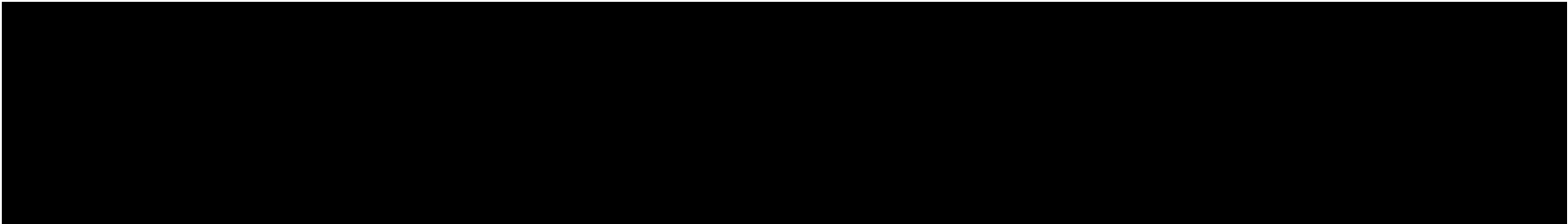
A large rectangular area of the document is completely blacked out, indicating that the content has been redacted. This area likely contained the data for Table 7.

Table 7: Summary of analytical parameters for corrosion coupons.

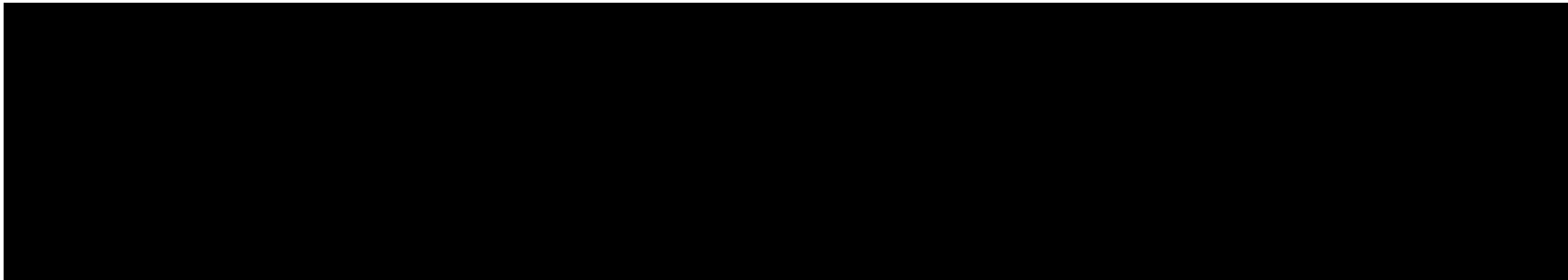
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Table 8: Mass Flow Rate Field Gauge - CO₂ Mass Flow Rate Measurement Criteria.

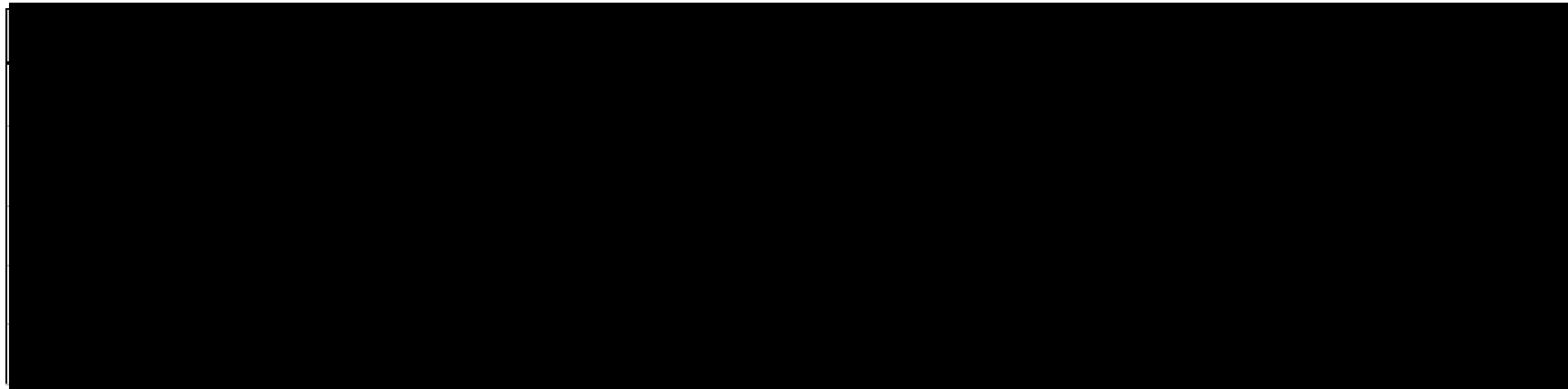
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Table 9: Mass Flow Rate Field Gauge - CO₂ Mass Flow Rate Performance Criteria

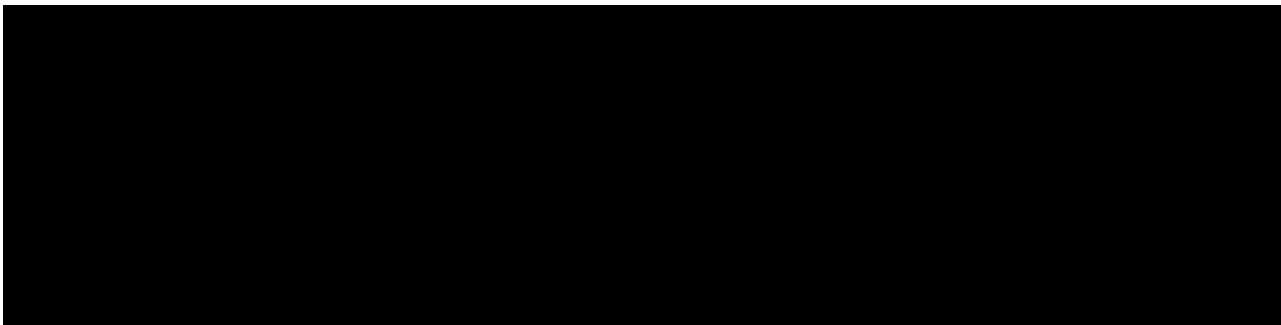
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Table 10: Pressure Field Gauge - Injection tubing, annulus, pipeline.

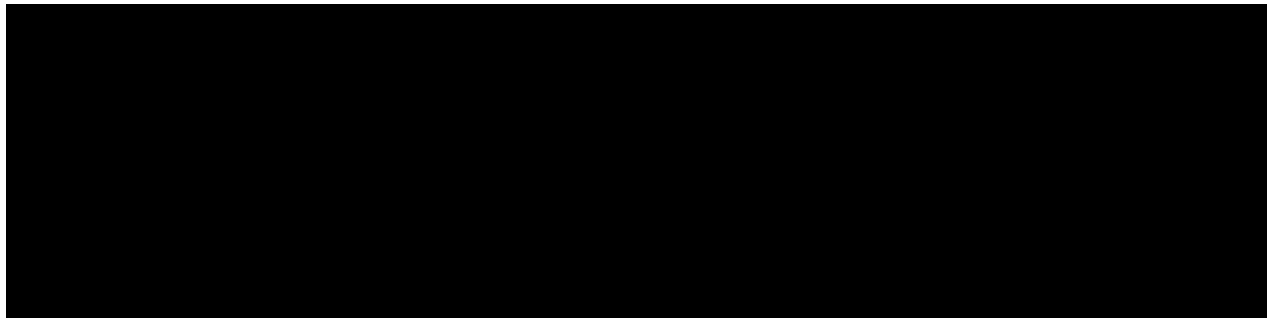
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Table 11: Temperature Field Gauge - Injection tubing, annulus, pipeline.

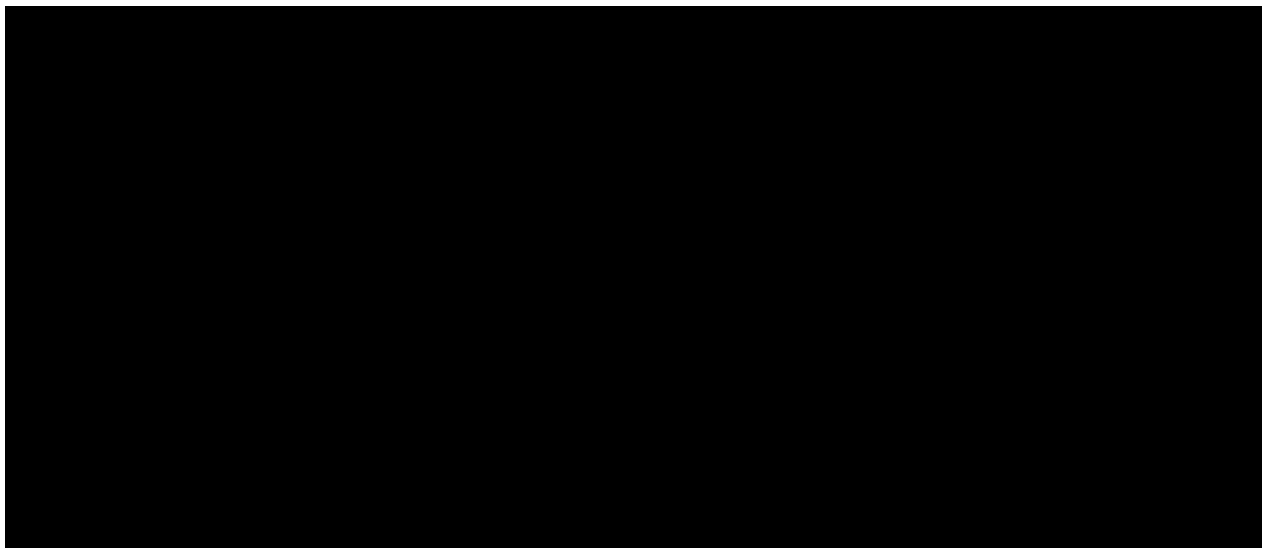
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Table 12: Pressure and temperature - bottomhole gauge specifications (PPS25).

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Table 13: Representative logging tool specifications. Actual tools used will be comparable. (CBL – Cement Bond Log, USI – Ultrasonic Imager for cement bond log)

Table 14 presents the monitoring methods that will require additional testing or monitoring if exceedances or variances are observed. In the table, the routine measurement method is followed by the additional monitoring that would occur if an exceedance was measured.

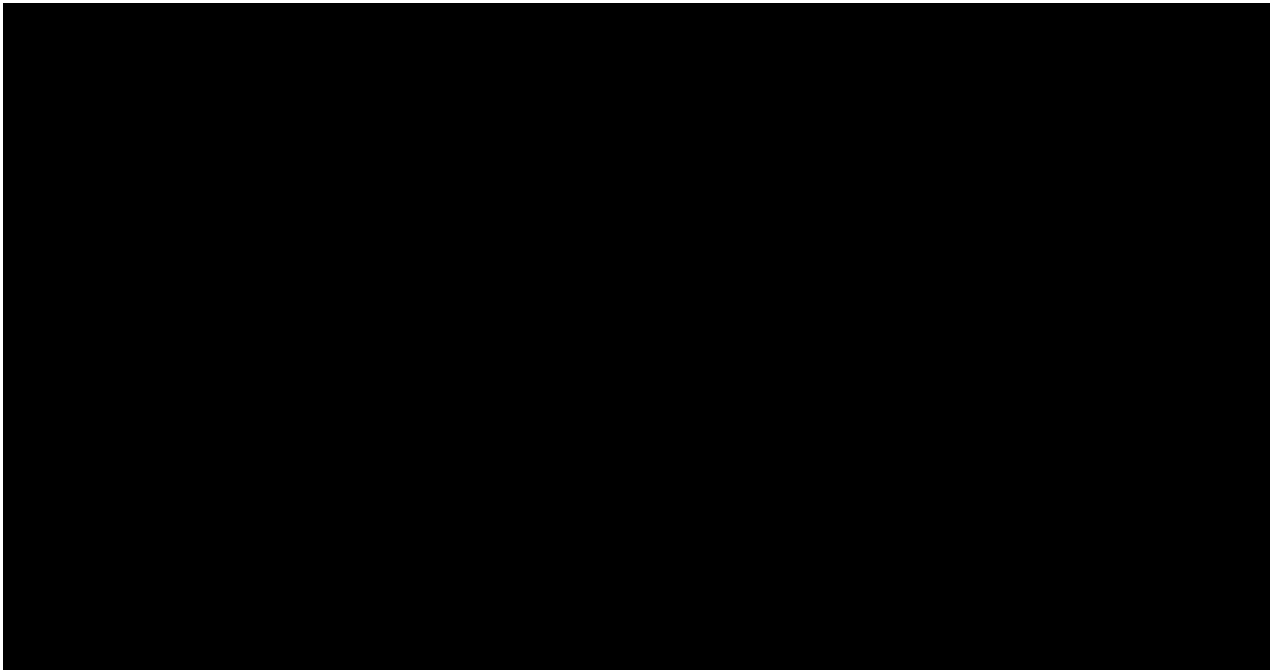
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Table 14: Actionable testing and monitoring outputs.

A.4.2 Precision

The specification and precision of each monitoring method are detailed in the tables above. For groundwater sampling, the accuracy of the data will be assessed by the collection and analysis of

field blanks to test sampling procedures and matrix spikes to test lab procedures. Field blanks will be taken no less than once per sampling event to determine if the sample bottle is contaminated. Laboratory assessment of analytical precision will be the responsibility of the individual laboratories per their standard operating procedures (SOPs).

A.4.3 Bias

Laboratory assessment of analytical bias will be the responsibility of the individual laboratories per their SOPs and analytical methodologies. For direct pressure or logging measurements, there is no bias.

A.4.4 Representativeness

For groundwater sampling, data representativeness expresses the degree to which data accurately and precisely represent a characteristic of a population, parameter variations at a sampling point, a process condition, or an environmental condition. The sampling network has been designed to provide data representative of site conditions including potentiometric surfaces, potential contamination locations from industry/population centers, etc. or the analytical results of individual groundwater samples, representativeness will be estimated by ion charge and mass balances. Ion balances with $\pm 10\%$ error or less will be considered valid. Mass balance assessment will be used in cases where the ion balance is greater than $\pm 10\%$ to help determine the source of error. For a sample and its duplicate, if the relative percent difference (RPD) is greater than 10%, the sample may be considered non-representative.

A.4.5 Completeness

For groundwater sampling, data completeness is a measure of the amount of valid data obtained from a measurement system compared to the amount that was expected to be obtained under normal conditions. It is anticipated that data completeness of 90% for groundwater sampling will be acceptable to meet monitoring goals. For direct pressure, temperature, and flow measurements, it is expected that data will be recorded no less than 90% of the injection time.

A.4.6 Comparability

Data comparability expresses the confidence with which one data set can be compared to another. The data sets to be generated by this project will be consistent because of the use of standard methods and the level of quality assurance/quality control (QA/QC) effort. Direct pressure, temperature, and logging measurements will be directly comparable to previously obtained baseline or project data.

A.5. Special Training/Certifications

A.5.1 Specialized Training and Certifications

The geophysical survey equipment and wireline logging tools will be operated by qualified personnel, according to the service company which provides the equipment. The subsequent data

will be processed and analyzed according to industry standards.

No specialized certifications are required for personnel conducting groundwater sampling, but field sampling will be conducted by trained personnel. Groundwater sampling will be conducted by personnel trained to understand and follow the project-specific sampling procedures.

Upon request, the agency will be provided with all laboratory SOPs developed for the specific parameter using the appropriate standard method. Each laboratory technician conducting the analysis on the samples will be trained on the SOP developed for each standard method. The technician's training certification will be included with the biannual report.

A.5.2 Training Provider and Responsibility

Cass Sequestration will only engage service companies and contractors with suitably qualified personnel who will be responsible for operating equipment or conducting testing as required.

A.6. Documentation and Records

A.6.1 Report Format and Package Information

A semi-annual report to the EPA will contain all required project data, including the testing and monitoring information as specified by the UIC Class VI permit. Data will be provided in electronic or other formats as required by the UIC Program Director.

A.6.2 Other Project Documents, Records, and Electronic Files

Other documents, records, and electronic files such as well logs, test results, or other data will be provided as required by the UIC Program Director.

A.6.3 Data Storage and Duration

Cass Sequestration or a designated contractor will maintain the required project data as provided elsewhere in the permit.

A.6.4 QASP Distribution Responsibility

The Operations Director at Cass Sequestration, LLC will be responsible for ensuring that all those on the distribution will receive the most current copy of the approved QASP.

B. Data Generation and Acquisition

B.1. Sampling Process Design (Experimental Design)

During the pre-injection phase, fluid samples will be collected and analyzed for parameters listed in **Table 5** to establish baseline conditions of the fluids within the formations of interest. Regular

sampling will be performed during the injection and post-injection phases of the project to track the migration of CO₂ through the storage formation and to confirm that CO₂ and other fluids of interest have not migrated out of the storage formation. Analytes will include selected constituents that are:

- Primary and secondary EPA drinking water contaminants
- Those most responsive in the interaction of CO₂ with the formation fluids and minerals
- Those needed for QC

The full set of selected parameters for each sampling interval is given in **Table 5**. A majority of the samples will be analyzed using a laboratory that meets the requirements under the EPA Environmental Laboratory Accreditation Program. Some collected samples may be analyzed in the ethanol plant QA laboratory using approved methods. Isotopic analysis will be conducted using established methods. The pressure, temperature, and flowrate of the CO₂ injection stream will be monitored on a continuous basis using instrumentation located in the pipeline between the final compression stage and the wellhead. In addition, samples of the injection stream will be collected on a quarterly basis for analysis. The sampling and analysis will be completed to ensure compliance with the approved Class VI permit.

B.1.1 Design Strategy

CO₂ Stream Monitoring Strategy

Regular sampling of the CO₂ stream provides an evaluation of the potential interactions of the CO₂ and other constituents of the injection stream with mineral components and fluids within the storage formation (**Table 6**). It can also identify increases in trace components, such as water content, that could accelerate well corrosion and negatively impact well integrity. Minor variation (<5%) is expected in the composition of the injected CO₂ stream. As a result, quarterly sampling of the CO₂ injection stream will be sufficient to accurately track the composition of the stream. An initial calibration and validation of the instruments will be performed by the manufacturers and will be verified by the project on a regular basis.

Corrosion Monitoring Strategy

Corrosion coupon analyses will be conducted quarterly to assess the mechanical integrity of the well components that are in contact with the CO₂ (**Table 7**). The coupons will be assessed for any loss of mass thickness, cracking, pitting, and other signs of corrosion that could be indicative of future well integrity issues. The analysis will be in accordance with National Association of Corrosion Engineers (NACE) Standard RP-0775 (or similar) to determine and document corrosion wear rates.

USDW Monitoring Strategy

There is an existing, extensive, groundwater monitoring program in place at the facility. A subset of this network will be selected, and supplemented with additional wells, to provide the required sampling coverage across the AoR.

Baseline groundwater samples will be acquired from these wells to characterize the seasonal variations in water quality within the AoR prior to the start of CO₂ injection. These groundwater samples will also have their geochemistry. Throughout the injection and PISC phases of the project, the results of the aqueous geochemistry and isotope analyses will be compared to the baseline conditions for any indication of CO₂ or brine migration into the shallow groundwater aquifer.

Above Zone Monitoring Strategy

An above zone monitoring wells (AZM) will be drilled for the project (40 CFR 146.90 (d)) near the injection well to monitor the aquifers above the confining layer. If there is CO₂ or brine migration out of the storage formation along the injection wellbore into a deep permeable water zone, this well will provide opportunity to identify its presence. This well will allow for pressure and temperature monitoring as well as annual fluid sampling in the aquifers above the confining layer (**Table 5**). Pressure/temperature sensors will be placed on the outside of the tubing in the AZM well to allow continuous measurements within the first permeable layer above the confining layer. The sensors will be real-time surface readout sensors connected and recorded through the SCADA system. A bailer system will be used to collect the fluid samples to evaluate geochemical changes in groundwater fluids. Samples will be analyzed for field constituents using a calibrated water quality meter (Horiba U-53, or similar outlined in **Table 5**). The geochemical analyses will be performed by Intertek Laboratories, or a similar laboratory.

CO₂ or brine migration into the USDW will most likely be first identified through pressure changes. The presence of CO₂ or brine in the overlying aquifers can be further confirmed through aqueous geochemistry data and analysis of isotopes. If deep early-detection monitoring data in the AZM well indicate that CO₂ has migrated out of the storage formation, it will trigger external well integrity testing of the injection and deep monitoring wells. It may also trigger a time-lapse borehole seismic VSP survey earlier than initially planned.

Storage Formation Monitoring Strategy

The storage formation will be monitored through pressure and temperature sensors, fluid sampling and analysis, time-lapse 2D seismic data, and microseismic monitoring to characterize the development of the CO₂ and pressure plumes over the injection and PISC phases of the project. Wellhead gas samples will be collected annually to monitor CO₂ breakthrough. Brine samples will be collected from the deep monitoring well on a as needed basis until the well becomes saturated

with CO₂, while the pressure gauges will provide real-time surface readout.

In Zone Monitoring Well Sampling

The in zone monitoring well will be used to monitor the pressure and CO₂ plume development in the storage formation through the injection phase of the project. Pressure sensors will also be placed in the in zone monitoring well to track the pressure response due to CO₂ injection. The sensors will be real-time surface readout sensors connected and recorded through the SCADA system.

Fluid samples will be collected on an annual basis from the storage formation to monitor CO₂ plume migration within the formation. The well will be swabbed to produce representative formation fluid in the well. During the swabbing process, the swab water will be analyzed in the field using a calibrated water quality meter (Horiba U-53, or similar). After swabbing the well, fluid samples will be collected using a bailer-style system. Samples will be analyzed for constituents that can be used to measure changes in chemistry that would be caused by interaction with the injected CO₂ (**Table 4**).

B.1.2 Type and Number of Samples/Test Runs

The types and additional details of the sampling and monitoring methods are provided in **Table 4** of this document.

B.1.3 Site/Sampling Locations

A network of shallow groundwater wells will be used, and an AZM well will be drilled. The geochemistry of the storage formation will be monitored using the deep monitoring well.

The chemical composition, pressure and temperature, and mass flowrates of the CO₂ injection stream will be monitored downstream of the capture plant tailgate and upstream of the injection well. At the injection skid near the wellbore, the wellhead pressure and temperature will be measured along with the annular pressure and volume. The pressure in the storage formation will also be collected from downhole gauges. In addition, corrosion monitoring will be completed in the pipeline between the capture plant and the injection well.

B.1.4 Sampling Site Contingency

Access to the wells is not anticipated to be a problem over the course of the project. The surface location of wells are all located on relatively flat land not currently near any residential or commercial buildings or any rough terrain. If inclement weather makes site access difficult, sampling schedules will be reviewed, and alternative dates may be selected that would still meet permit-related conditions.

B.1.5 Activity Schedule

Table 3 provides the schedules for the sampling and monitoring activities along with other pertinent details regarding the techniques.

B.1.6 Critical/Informational Data

During data acquisition for the testing and monitoring activities, field and laboratory information will be documented in detail. Information will be recorded in field and laboratory forms and notebooks. Critical information will include the time and date of activity, person(s) performing activity, location of the activity or instrument, field or laboratory instrument calibration data, and field parameter values. For laboratory analyses, much of the critical data will be generated during the analysis and provided to the project in digital and printed formats. Noncritical data may include notations of the appearance and problems with the wells or sampling/monitoring equipment, and weather conditions.

B.1.7 Sources of Variability

Potential sources of variability related to monitoring activities include:

- Natural variations in fluid geochemistry, formation pressure and temperature, and natural seismic activity
- Variation in fluid geochemistry, formation pressure and temperature, and induced seismic activity due to project operations
- Changes in USDW recharge due to rainfall, drought, and snowfall
- Changes in instrument calibration during sampling or analytical activity
- Variations in the staff collecting or analyzing samples
- Differences in environmental conditions during field activities
- Changes in analytical data quality during life of project
- Loss of access to an original data acquisition point
- Data entry errors related to maintaining project database
- Variation in available analytic equipment

Activities to eliminate, reduce, or reconcile variability related to monitoring activities include:

- Collection of long-term baseline data to observe and document natural variation in monitoring parameters
- Evaluation of data in timely manner after collection to observe anomalies in data that can be addressed through resampling
- Conducting statistical analysis of monitoring data to determine whether variability in a data set is the result of project activities or natural variation
- Checking instrument calibration before, during and after sampling or sample analysis
- Staff training
- The use of standard operating procedures to describe testing and monitoring activities

- Conducting laboratory QA checks using third party reference materials, and/or blind and/or replicate sample checks
- Defining potential backup sites for sample acquisition should an original sample point become inaccessible/lost

B.2. Sampling Methods

Well logging, geophysical monitoring, and pressure/temperature monitoring do not apply to this section.

B.2.1 Sampling SOPs

Groundwater samples will be collected from the shallow wells using a low-flow sampling method consistent with ASTM D6452-99 (2005b) or Puls and Barcelona (1996). If a flow-through cell is not used, field parameters will be measured in grab samples. Groundwater wells will be purged to ensure samples are representative of formation water quality. Static water levels in each well will be determined before any purging or sampling activities begin. The pH, temperature, specific conductance, and dissolved oxygen of the purge water will be monitored in the field using portable probes and a flow-through cell consistent with standard methods given sufficient flow rates and volumes. Field chemistry probes will be calibrated at the beginning of each sampling day according to equipment manufacturer procedures using standard reference solutions. When a flow-through cell is used, field parameters will be continuously monitored and will be considered stable when three successive measurements made three minutes apart meet the criteria listed in **Table 15**.

After field parameters have stabilized, samples will be collected. Samples requiring filtration will be filtered through 0.45 micrometer (μm) flow-through filter cartridges as appropriate and consistent with ASTM D6564-00 (2005a). Prior to sample collection, filters will be purged with a minimum of 100 milliliters (mL) of well water (or more if required by the filter manufacturer). For alkalinity and total CO_2 samples, efforts will be made to minimize exposure to the atmosphere during filtration.

Specific sampling methods used may vary depending on the type of well (irrigation or residential) under test. The appropriate SOP will be followed in all cases.

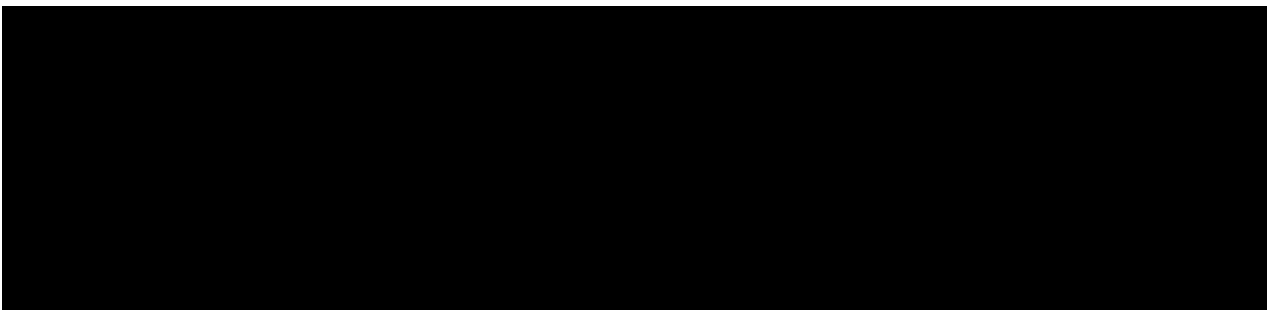


Table 15: Stabilization criteria of water quality parameters during shallow well purging.

Fluid gas samples will be collected from the wellhead of the IZW. A gas sampling container will be attached to the top of the swab valve and to the casing valve to capture wellhead gas from the tubing and annulus which will be tested for CO₂.

Samples will also be collected from the AZM well using a bailer system lowered into the well via slickline, or other applicable means. Prior to sample collection, the well will be purged by swabbing the well to remove stagnant fluids and to ensure representative formation fluids are present in the well. The pH, temperature, specific conductance, and dissolved oxygen of the swabbed water will be monitored every swab run in the field using portable probes until the parameters stabilize (**Table 15**) for three successive runs, grab samples will be used to collect the samples. Field chemistry probes will be calibrated at the beginning of each sampling day according to equipment manufacturer procedures using standard reference solutions.

After the well has been swabbed, the bailer system will be lowered into the well to collect sufficient volume of the fluid to complete the analyses. The samples will be transferred to the appropriate bottles for each analytical method. Samples that require filtering will be filtered through a 0.45 µm cartridge filter per the procedure.

For the CO₂ stream, samples will be collected from a sampling port located on the flowline between the capture plant discharge and the wellhead where the injectant is most representative of the stream being injected into the well. The samples will be collected in Department of Transportation (DOT)-rated pressure cylinders that can be sent to an analytical laboratory for analysis or analyzed in the ethanol plant QA laboratory. A pressure regulator will reduce the pressure of the CO₂ to approximately 250 pounds per square inch (psi) so that the CO₂ is in the gaseous state when collected rather than a super-critical liquid. Cylinders will be purged with sample gas (i.e., CO₂) at least five times prior to sample collection to remove laboratory-added helium gas and ensure a representative sample. During purging, the outlet of the sample cylinder will be connected to a ventilation line and vented to the atmosphere. The appropriate sampling technique is critical for any gas analysis program. Therefore, great care will be taken to ensure that the cylinder is not contaminated by atmospheric gas, and the sample is representative of the CO₂ in the pipeline.

B.2.2 In-situ Monitoring

In-situ monitoring of groundwater chemistry is not currently planned.

B.2.3 Continuous Monitoring

The pressure and temperature in the deep and AZM monitoring wells will be continuously monitored using permanent pressure and temperature sensors. These data will be used to calibrate the computational modeling over the life of the project.

B.2.4 Sample Containers and Volumes

For CO₂ stream monitoring, samples will be collected in a clean sample cylinder rated for the appropriate collection pressure provided by an accredited analytical laboratory.

CO₂ quarterly gas analysis will include:

- CO₂ Purity (% volume [v]/v, gas chromatograph [GC])
- Oxygen (O₂, parts per million [ppm] v/v)
- Nitrogen (N₂, ppm v/v)
- Hydrogen Sulfide (H₂S ppm v/v)

For shallow and deep fluid samples, all sample bottles will be new. Sample bottles for analytes will be used as received from the vendor or contract analytical laboratory for the analyte of interest.

B.2.5 Sample Preservation

For groundwater and other aqueous samples, the preservation methods provided in **Table 16** will be used.

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Table 16: Preservation, containers, and hold times for aqueous samples.

No preservation will be required for the CO₂ injection stream samples; additional details for the gas sampling are provided in **Table 17**. Corrosion coupon sampling only requires that the coupons be physically separated (e.g., sleeves, baggies) during transportation to prevent physical abrasion.

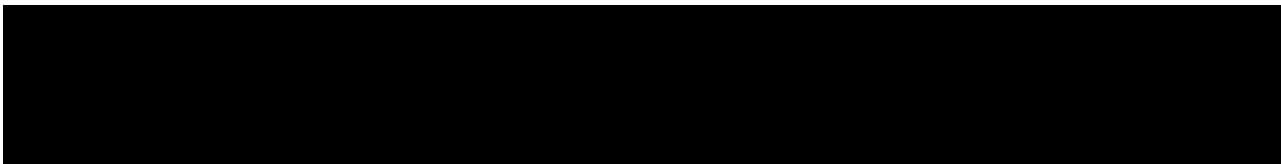
A large black rectangular box redacting the content of Table 17.

Table 17: Preservation, containers, and hold times for gas samples.

B.2.6 Cleaning/Decontamination of Sampling Equipment

The cleaning and decontamination sampling equipment is site specific and will depend on whether preexisting pumps are in place. All non-dedicated equipment should be decontaminated after each use to avoid cross contamination between wells. It is especially important to ensure that equipment that is in direct contact with well water should be cleaned between wells.

All field glassware (pipets, beakers, filter holders, etc.) will be cleaned with tap water to remove any loose dirt and rinsed three times with deionized water before use. CO₂ gas stream sampling cylinders will be decontaminated by the analytical lab, and no sampling equipment will be utilized with the corrosion coupons or annual field gauge calibrations.

B.2.7 Support Facilities

Field activities are usually completed in mobile laboratory vehicles or trailers located on site. Fluid sampling may require the use of an air compressor, vacuum pump, generator, filters, and analytical meters (pH, specific conductance, etc.). Sample tubing, connectors and valves required to sample the CO₂ gas stream will be supplied by the analytical lab providing the sampling containers. CO₂ gas sampling will occur in the pipeline between the capture plant outlet and the wellhead. Similarly, corrosion coupons will be installed between the outlet of the CO₂ Capture facility and the wellhead in the CO₂ injection pipeline.

Downhole gauges will be removed from the injection, deep monitoring and AZM wells utilizing existing standard industry tools and equipment (slickline). Deployment and retrieval of the well gauges will be done using procedures and equipment recommended by the vendor, subcontractor, or as is standard per oil and gas industry practice.

B.2.8 Corrective Action, Personnel, and Documentation

Field technicians will be responsible for interrogating testing equipment and performing corrective actions on broken or malfunctioning field equipment. If corrective action cannot be taken in the field, then equipment will be returned to the manufacturer for repair or replacement. Significant corrective actions that occur during the sampling and data collection activities that affect analytical results will be documented in field notes.

B.3. Sample Handling and Custody

Well logging, geophysical monitoring, and pressure and temperature monitoring do not apply to this section and are omitted.

Sample holding times will be consistent with standard methods (**Table 16**). After collection and any necessary preservation, samples will be placed in ice chests in the field and maintained thereafter at approximately 4 degrees Celsius (°C) until analysis. The samples will be maintained at their preservation temperature and sent to the designated laboratory within 24 hours. Analysis of the samples will be completed within the holding time listed in **Table 16**. As appropriate, alternative sample containers and preservation techniques approved by the UIC Program Director will be used to meet analytical requirements.

B.3.1 Maximum Hold Time/Time Before Retrieval

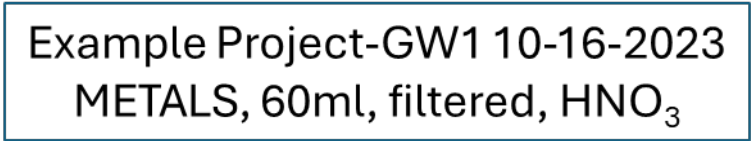
See **Table 17**.

B.3.2 Sample Transportation

See description in Section B.2.

B.3.4 Sample Identification

All sample bottles will have waterproof labels with information denoting project, sampling date, sampling location, sample identification number, fluid sample, sample type, analyte, volume, filtration used (if any), and preservative used (if any). See **Figure 3** for an example of a label.

A rectangular label with a blue border containing two lines of text. The first line reads "Example Project-GW1 10-16-2023" and the second line reads "METALS, 60ml, filtered, HNO₃".

Example Project-GW1 10-16-2023
METALS, 60ml, filtered, HNO₃

Figure 3: Example label for groundwater sample bottles.

B.3.3 Sampling Documentation

Field notes will be taken for all groundwater samples collected. These forms will be retained and archived as reference. The sample documentation is the responsibility of water sampling personnel. A chain-of-custody form will be provided with each CO₂ gas stream sample or fluid sample provided for analysis as shown in **Figure 4** and **Figure 5**.

B.3.5 Sample Chain-of-Custody

For CO₂ stream analysis, a chain-of-custody form will accompany the sample to the laboratory (**Figure 4**). The chain-of-custody form will include sample identification (ID), sample collection date/time, sample pressure, and analytical requirements. A chain-of-custody form will accompany the sample through the analytical process. Copies of the chain-of-custody forms will be retained for reference.

For groundwater samples, the chain-of-custody will be documented using a standardized form. A typical form is shown in **Figure 5**. Copies of the chain-of-custody forms will be provided to the person or lab receiving the samples as well as the person or lab transferring the samples. These forms will be retained and archived to allow simplified tracking of sample status. The chain-of -custody form and record keeping is the responsibility of groundwater sampling personnel.

B.4. Analytical Methods

Well logging, geophysical monitoring, and pressure and temperature monitoring do not apply to this section and are omitted.

B.4.1 Analytical SOPs

Analytical methods are referenced in **Table 5** and **Table 6**. Upon request, Cass Sequestration will provide the EPA, or it's delegated primacy agency, with all laboratory SOPs developed for the specific parameter using the appropriate standard method.

B.4.2 Equipment/Instrumentation Needed

Equipment and instrumentation are specified in the individual analytical methods referenced in **Table 5** and **Table 6**.

B.4.3 Method Performance Criteria

Nonstandard method performance criteria are not anticipated for this project.

B.4.4 Analytical Failure

Each laboratory conducting the analyses in **Table 5** through **Table 8** will be responsible for appropriately addressing analytical failure according to their individual SOPs.

B.4.5 Sample Disposal

Each laboratory conducting the analyses in **Table 5** and **Table 6** will be responsible for appropriate sample disposal according to their individual SOPs.

B.4.6 Laboratory Turnaround

Laboratory turnaround will vary by laboratory, but generally turnaround of verified analytical results within one month will be suitable for project needs.

B.4.7 Method Validation for Nonstandard Methods

Nonstandard methods are not anticipated for this project.

		Office: _____						
		• Job Order Number: _____						
NON COMMERCIAL BILL OF LADING								
CHAIN OF CUSTODY ☐ SAMPLE TRANSPORTATION RECORD ☐ SAMPLE DISTRIBUTION RECORD ☐ SAMPLE RECEIPT ☐								
<u>Point of Origin</u>	<u>Intermediary</u>	<u>Destination</u>						
Full Name And Address:								
Relinquished By:	Received By:	Received By:						
Print:	Print:	Print:						
Date:	Date:	Date:						
Time:	Time:	Time:						
* I hereby declare that the contents of this consignment are fully and accurately described below by the correct technical name(s) (Proper Shipping Name(s)), and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national government regulations.								
Delivered By: Intertek / Commercial carrier (circle one)		<u>Customer Product Description</u>						
Inspector/ Driver: _____		Product 1 : _____						
Carrier: _____		Product 2 : _____						
Air Bill Number: _____		Product 3 : _____						
Date Shipped: _____		Product 4 : _____						
Note: All volumes must be in Metric units								
UN NUMBER	PROPER SHIPPING NAME	HAZARDOUS CLASS NUMBER	PACKING GROUP	PRODUCT NUMBER	NUMBER OF SAMPLES	CONTAINER SIZE	SAMPLE SOURCE	SEAL NUMBER(S)

Figure 5: Example chain-of-custody form for the fluid sample analyses.

B.5. Quality Control

Geophysical monitoring and pressure/temperature monitoring do not apply to this section and are omitted.

B.5.1 QC Activities

Blanks

For shallow and deep groundwater/brine sampling, a field blank will be collected and analyzed for the inorganic analytes in **Table 5** at a frequency of no less than one blank per field event. Field blanks will be exposed to the same field and transport conditions as the groundwater samples. Field blanks will be used to detect contamination resulting from the collection and transportation process.

No field blanks will be collected for the injection stream sampling. Contamination and representative sampling will be determined through the concentrations of nitrogen and helium (that have been spiked into the cylinder) in the sample.

Duplicates

For each fluid sampling round, at least one duplicate sample will be collected from a well. Duplicate

samples will be collected from the same source immediately after the original sample in different sample containers and processed as all other samples. Duplicate samples will be used to assess sample heterogeneity and analytical precision.

B.5.2 Exceeding Control Limits

If the sample analytical results exceed control limits (i.e., ion balances $> \pm 10\%$), further examination of the analytical results will be done by evaluating the ratio of the measured total dissolved solids (TDS) to calculated TDS (i.e., mass balance) per method. The method indicates which ion analyses should be considered suspect based on the mass balance ratio. Suspect ion analyses are then reviewed in the context of historical data and interlaboratory results. If available, suspect ion analyses will then be brought to the attention of the analytical laboratory for confirmation and/or reanalysis. The ion balance will be recalculated, and if the error is still not resolved, the suspect data will be identified and may be given less importance in data interpretations. Additional samples may be collected for repeat analyses to confirm the analytical results.

B.5.3 Calculating Applicable QC Statistics

Charge Balance

The analytical results will be evaluated to determine correctness of analyses based on the anion-cation charge balance calculation. Since fluid samples should be electrically neutral, the chemical analyses should yield equally negative and positive ionic activity. The anion-cation charge balance will be calculated using the formula:

$$\% \text{ difference} = 100 \times \left(\frac{\sum \text{cations} - \sum \text{anions}}{\sum \text{cations} + \sum \text{anions}} \right) \quad (\text{Equation 1})$$

where the sums of the ions are represented in milliequivalents per liter and the criteria for acceptable charge balance is $\pm 10\%$.

Mass Balance

The ratio of the measured TDS to the calculated TDS will be calculated in instances where the charge balance acceptance criteria are exceeded using the formula:

$$1.0 < \frac{\text{measured TDS}}{\text{calculated TDS}} < 1.2 \quad (\text{Equation 2})$$

where the anticipated values are between 1.0 and 1.2.

Outliers

The determination of one or more statistical outliers is essential prior to the statistical evaluation

of groundwater. This project will use the EPA's Unified Guidance (March 2009) as a basis for selection of recommended statistical methods to identify outliers in water/brine chemistry data sets as appropriate. These techniques include probability plots, box plots, Dixon's test, and Rosner's test. The EPA-1989 outlier test may also be used as another screening tool to identify potential outliers.

B.6. Instrument/Equipment Testing, Inspection, and Maintenance

Logging tool equipment will be maintained as per wireline industry best practices.

All pressure, temperature, and mass flow measurement equipment will be maintained per the manufacturer's specifications. Any necessary calibrations or repairs will also be performed per the manufacturer's specification or by the manufacturer of the equipment.

For fluid sampling, the field equipment will be maintained, factory serviced, and factory calibrated per manufacturer's recommendations. Common spare parts that may be needed during sampling will be included in supplies on hand during field sampling.

For all laboratory equipment, testing, inspection, and maintenance will be the responsibility of the analytical laboratory per standard practice, method-specific protocol, or NELAP requirement.

B.7. Instrument/Equipment Calibration and Frequency

Geophysical monitoring does not apply to this section and is omitted.

B.7.1 Calibration and Frequency of Calibration

Pressure and temperature sensor calibration will be performed annually, or at manufacturer recommendation, and will be the responsibility of the equipment subcontractor. Logging tool calibration will be at the discretion of the service company providing the equipment and following standard industry practices.

For water sampling, the portable field meters or multiprobe sondes used to determine field parameters (e.g., pH, temperature, specific conductance, dissolved oxygen) will be calibrated according to manufacturer recommendations and equipment manuals (i.e., each day before sample collection begins). Recalibration will be performed if any components yield atypical values or fail to stabilize during sampling.

B.7.2 Calibration Methodology

Logging tool calibration methodology will follow standard industry practices.

The surface pressure, temperature, and mass flow meters will be calibrated annually, or at manufacturer recommendation.

For water sampling, standards used for calibration are typically 7 and 10 for pH, a potassium

chloride solution yielding a value of 1413 microsiemens per centimeter ($\mu\text{S}/\text{cm}$) at 25°C for specific conductance, and a 100% dissolved O_2 solution for dissolved oxygen. Calibration is performed for the pH meters per manufacturer's specifications using a 2-point calibration bounding the range of the sample. For coulometry, sodium carbonate standards (typically yielding a concentration of 4,000 milligrams $[\text{mg}] \text{CO}_2/\text{L}$) are routinely analyzed to evaluate the instrument.

B.7.3 Calibration Resolution and Documentation

Logging tool calibration resolution and documentation will follow standard industry practices.

Manufacturers of the pressure, temperature, and mass flow equipment will provide calibration certifications for their equipment. If calibration cannot be achieved with the equipment, this piece of equipment will be repaired, or replaced with a new piece of equipment.

For water sampling, calibration values are recorded in daily sampling records and any errors in calibration are noted. For parameters where calibration is not acceptable, redundant equipment may be used so loss of data is minimized.

B.8. Inspection/Acceptance for Supplies and Consumables

B.8.1 Supplies, Consumables, and Responsibilities

Supplies and consumables for field and laboratory operations will be procured, inspected, and accepted as required from vendors approved by the project manager, or designee in **Table 2**, or the respective subcontractor responsible for the data collection activity. Acquisition of supplies and consumables related to groundwater analyses will be the responsibility of the laboratory per established standard methodology or SOPs.

B.9. Non-direct Measurements

B.9.1 Seismic Monitoring Methods

Data Sources

2D surface seismic surveys will be conducted at regular intervals during and after CO_2 injection. Each of these surveys will be compared to the baseline survey which will be acquired before the start of CO_2 injection. It is important that the only difference between the surveys is the change in acoustic properties of the storage formation caused by the presence of CO_2 . Consequently, repeatability of source and receiver types and spacing/location, source size and type, weather/soil conditions, and other acquisition parameters between surveys is paramount for an accurate comparison.

Relevance to Project

Time-lapse 2D seismic surveys will be used to track changes in the CO₂ plume in the subsurface. A modeling exercise has been completed to confirm that the planned injected volumes of CO₂ will result in sufficient change in the fluid properties of the storage formation to be detected using time-lapse 2D seismic.

Processing datasets and comparing subsequent surveys to a baseline survey will allow the project to monitor plume growth as well as to ensure that the plume does not migrate beyond the confining layer. Computational modeling will be used to predict the CO₂ plume growth and migration over time by combining the processed seismic data with the existing geologic model.

Acceptance Criteria

To ensure survey repeatability, consistent acquisition geometry is required. The seismic sources (vibroseis trucks) should be of the same capability for each survey, including the number of trucks, their specifications, and the characteristics (sweep parameters) of the seismic energy they generate.

Data processing for each survey should be the same; the baseline seismic survey should be reprocessed alongside each additional repeat seismic survey to ensure consistency.

Resources/Facilities Needed

Cass Sequestration will contract third-party resources and facilities for seismic monitoring, in-zone pressure monitoring, and groundwater sampling, as necessary.

Validity Limits and Operating Conditions

For seismic surveys and computational modeling, intraorganizational peer review between trained and experienced personnel will ensure that all surveys and computational modeling are conducted so as to conform to standard industry practices.

B.10. Data Management

B.10.1 Data Management Scheme

Cass Sequestration or a designated (sub)contractors will maintain the project data required in the permit. Data will be backed up in electronic format and/or held on secure servers. A separate Data Management Plan will be developed to track and store project data.

B.10.2 Record-keeping and Tracking Practices

All records of gathered data will be securely held and properly labeled for auditing purposes.

B.10.3 Data Handling Equipment/Procedures

All equipment used to store data will be properly maintained and operated according to proper industry techniques and/or manufacturer's requirements.

B.10.4 Responsibility

The primary project manager or designee in **Table 2** will be responsible for ensuring proper data management is maintained.

B.10.5 Data Archival and Retrieval

All data will be held by Cass Sequestration. These data will be maintained and stored for auditing purposes as described in Section B.10.1.

B.10.6 Hardware and Software Configurations

All Cass Sequestration and vendor hardware and software configurations will be appropriately interfaced.

B.10.7 Checklists and Forms

Checklists and forms will be procured and generated as necessary.

C. **Assessment and Oversight**

C.1. **Assessments and Response Actions**

C.1.1 Activities to be Conducted

Water quality data will be collected at the frequency outlined in **Table 4**. After completion of sample analysis, results will be reviewed for QC criteria, as noted in Section B.5. If the data quality fails to meet criteria set in Section B.5, samples will be reanalyzed, if still within holding time criteria. If outside of holding time criteria or at the operator manager's choosing, additional samples may be collected, or sample results may be excluded from data evaluations and interpretations. Evaluation for data consistency will be performed according to procedures described in the EPA 2009 Unified Guidance (EPA, 2009).

C.1.2 Responsibility for Conducting Assessments

Organizations gathering data will be responsible for conducting their internal assessments. All stop-work orders will be handled internally within individual organizations.

C.1.3 Assessment Reporting

All assessment information should be reported to the individual organizations' project manager outlined in Section A.1.1.

C.1.4 Corrective Action

All corrective action affecting only an individual organization's data collection responsibility should be addressed, verified, and documented by the individual project managers and communicated to the other project managers as necessary. Corrective actions affecting multiple organizations should be addressed by all members of the project leadership and communicated to other members on the distribution list for the QASP. Assessments may require integration of information from multiple monitoring sources across organizations (operational, in-zone monitoring, above-zone monitoring) to determine whether correction actions are required and/or the most cost-efficient and effective action to implement. Cass Sequestration will coordinate multiorganization assessments and corrective actions as warranted based on the severity of the event as described in Permit Section 10.0 - Emergency and Remedial Response Plan.

C.2. Reports to Management

C.2.1 QA Status Reports

QA status reports should not be needed. If any testing or monitoring techniques are changed, the QASP will be reviewed and updated as appropriate in consultation with EPA. Revised QASPs will be distributed by Cass Sequestration to the full distribution list given in **Table 1**.

D. Data Validation and Usability

D.1. Data Review, Verification, and Validation

D.1.1 Criteria for Accepting, Rejecting, or Qualifying Data

The groundwater/brine and injection stream analytical data validation will include the review of the concentration units, sample holding times, and the review of duplicate, blank and other appropriate QA/QC results. All analytical results will be entered into a database or spreadsheet with periodic data review and analysis. Cass Sequestration will retain copies of the laboratory analytical test results and/or reports. Analytical results will be reported on a frequency based on the approved UIC permit conditions. In the periodic reports, data will be presented in graphical and tabular formats as appropriate to characterize general system operations and variability with time.

D.2. Verification and Validation Methods

D.2.1 Data Verification and Validation Processes

See Sections D.1.1. and B.5 for data verification and validation processes.

Appropriate statistical analysis will be used to determine data consistency.

D.2.2 Data Verification and Validation Responsibility

Cass Sequestration or its designated (sub)contractors will verify and validate the injection stream

and water analytical data.

D.2.3 Issue Resolution Process and Responsibility

Cass Sequestration or its designated coordinator will provide an overview of the injection stream and water data handling, management, and assessment process. Staff involved in these processes will consult with the coordinator to determine actions that are required to resolve issues.

D.2.4 Checklist, Forms, and Calculations

Checklists and forms will be developed specifically to meet permit requirements.

D.3. Reconciliation with User Requirements

D.3.1 Evaluation of Data Uncertainty

Statistical methodologies will be used to determine water data consistency.

D.3.2 Data Limitations Reporting

The organization-level project managers will be responsible for ensuring that data developed by their respective organizations is presented with the appropriate data-use limitations.

Cass Sequestration will use their current operating procedure for the use, sharing, and presentation of results and/or data for the Cass Sequestration project. This procedure has been developed to ensure quality, internal consistency and facilitate tracking and record keeping of data end-users and associated publications.

References

ASTM, 2005a, Method D6564-00 (reapproved 2005), Standard guide for field filtration of ground-water samples, ASTM International, 100 Barr Harbor Drive, West Conshohocken, PA.

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U.S. Environmental Protection Agency (US EPA), 2009, Statistical analysis of groundwater monitoring data at RCRA facilities—Unified Guidance, US EPA, Office of Solid Waste, Washington, DC.