EMERGENCY AND REMEDIAL RESPONSE PLAN
40 CFR 146.94(a) AND CARB CCS PROTOCOL C.6

RUSSELL CO_2 CAPTURE AND SEQUESTRATION

Facility Information

Facility name: Russell CO_2 Storage Complex
CSS #1

Facility contact: Aaron Buettner, Chief Executive Officer
13632 W 95th St
Lenexa, KS 66215
Phone: (785) 261-0355
Email: Aaron.Buettner@PureField.com

Well location: Un-incorporated, Russell County, Kansas
Lat: 38.8855219472 Long: -98.7504253861 NAD 83 (2011)
Sec 27 T 13 S R 13 W 0' FSL – 2005' FEL

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List of Acronyms and Abbreviations

AFP = Alternative Fuels Portal CARB = California Air Resources Board CCS = Carbon Capture and Sequestration CO_2 = carbon dioxide ERRP = Emergency and Remedial Response Plan GSDT = Geologic Sequestration Data Tool M_L = local magnitude MMA = maximum monitoring area	PCC = PureField Carbon Capture, LLC PISC = Post-Injection Site Care SAS = Seismic Action Score UIC = Underground Injection Control US EPA = United States Environmental Protection Agency USDW = Underground Source of Drinking Water

H.1. Summary

PureField Carbon Capture, LLC (PCC) provides a single Emergency and Remedial Response Plan that meets the requirements of both the United States Environmental Protection Agency (US EPA) Underground Injection Control (UIC) Program (i.e., 40 CFR 146.94(a)) and the California Air Resources Board (CARB) Carbon Capture and Sequestration (CCS) Protocol under the Low Carbon Fuel Standard (i.e., CARB CCS Protocol C.6). PCC shall: a) take actions to address movement of the injection fluid or formation fluid in a manner that may endanger an Underground Source of Drinking Water (USDW) during the Construction, Injection, or Post-Injection Site Care (PISC) periods per 40 CFR 146.94(a), and b) take actions in the event of an emergency at the site that has the potential to endanger public health or the environment during construction, operation, and PISC periods per CARB CCS Protocol C.6. If PCC obtains evidence for either a) or b) then PCC must perform the following actions:

1. Initiate shutdown plan for the injection well – See Appendix H.1.
2. Take all steps reasonably necessary to identify and characterize any release.
3. Notify the following of the event within 24 hours:
    a. United States Environmental Protection Agency (US EPA) Underground Injection Control (UIC) Program Director– See Appendix H.2
    b. CARB Executive Officer – See Appendix H.3
4. Implement applicable portions of the approved Emergency and Remedial Response Plan (ERRP).

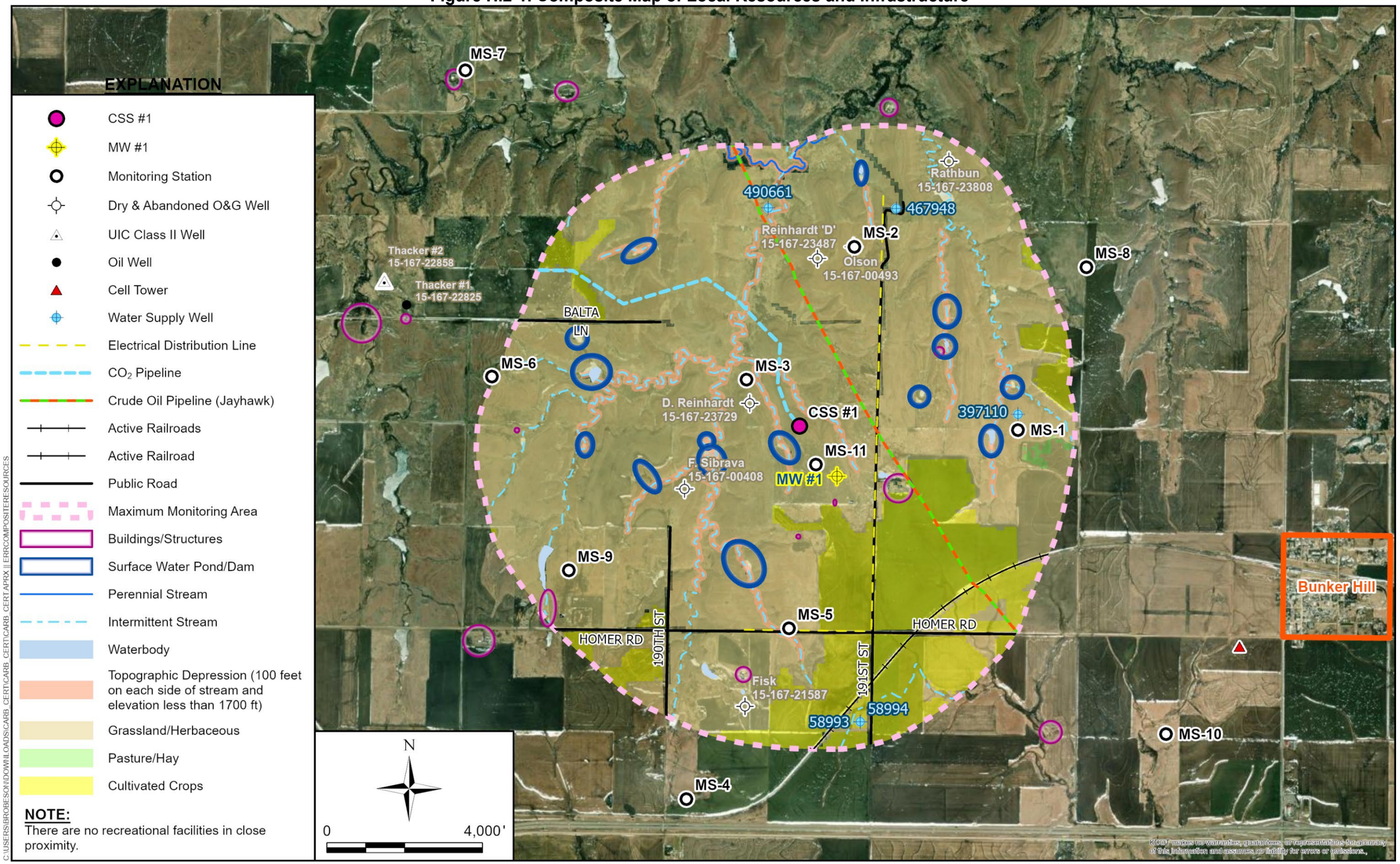
H.2. Local Resources and Infrastructure

Local resources and infrastructure are summarized by type:

Project Infrastructure: Figure H.2-1 displays locations for the injection well CSS #1, the monitoring well MW #1, monitoring stations MS-1 through MS-10, and the carbon dioxide (CO_2) pipeline for the project. Also included are locations of legacy oil and gas wellbores and the maximum monitoring area (MMA).

Water Resources: Figure H.2-1 displays locations for water wells and surface waters that include: three water supply wells within the MMA, multiple surface ponds within the MMA, plus Cedar Creek and un-named southern tributaries of Cedar Creek within the MMA. The entire geologic sequestration (GS) site and vicinity is underlain by surficial fresh groundwater (top depths 50’ – 102’ bgs) and fresh water in the Dakota Aquifer (top depths 153’ – 214’ bgs). Surface waters from the GS site drain north into Cedar Creek, which in turn drains into the Saline River and Wilson Lake located ~8 miles north-east of the GS site.

Figure H.2-1. Composite Map of Local Resources and Infrastructure



Land Resources: Figure H.2-1 displays locations for grasslands/herbaceous lands, pasture/hay lands, and cultivated crop lands per the U.S. National Land Cover Database for 2021[1]. There are no public lands or nature preserves within the GS site or close proximity.

Building Infrastructure: Figure H.2-1 displays locations for building infrastructure. The GS site and general vicinity are in a sparsely populated rural area. Within the MMA there are four residences with associated outbuildings (e.g., garage, workshop, barn) and three standalone grain storage bins, plus several additional residences with associated outbuildings in proximity to the MMA. There are no recreational facilities within the GS site or close proximity. The nearest high concentration of human occupancy is the City of Bunker Hill, KS (Population: 103, per 2020 census) located 2-½ miles east of CSS #1. There is a cell phone tower ¼-mi west of Bunker Hill along Homer Road, and Russell County operates a fire fighter station (Bunker Hill Rural Fire District #5) located within the city limits of Bunker Hill.

Topographical Depressions and Basements: Figure H.2-2 displays locations for topographical depressions and basements within the MMA. These low spots are locations where CO_2 releases could potentially accumulate since CO_2 is heavier than air. The valley floors can be 100' or more below the surface tops across the GS site. Property records indicate there are no basements in the buildings located within the MMA.

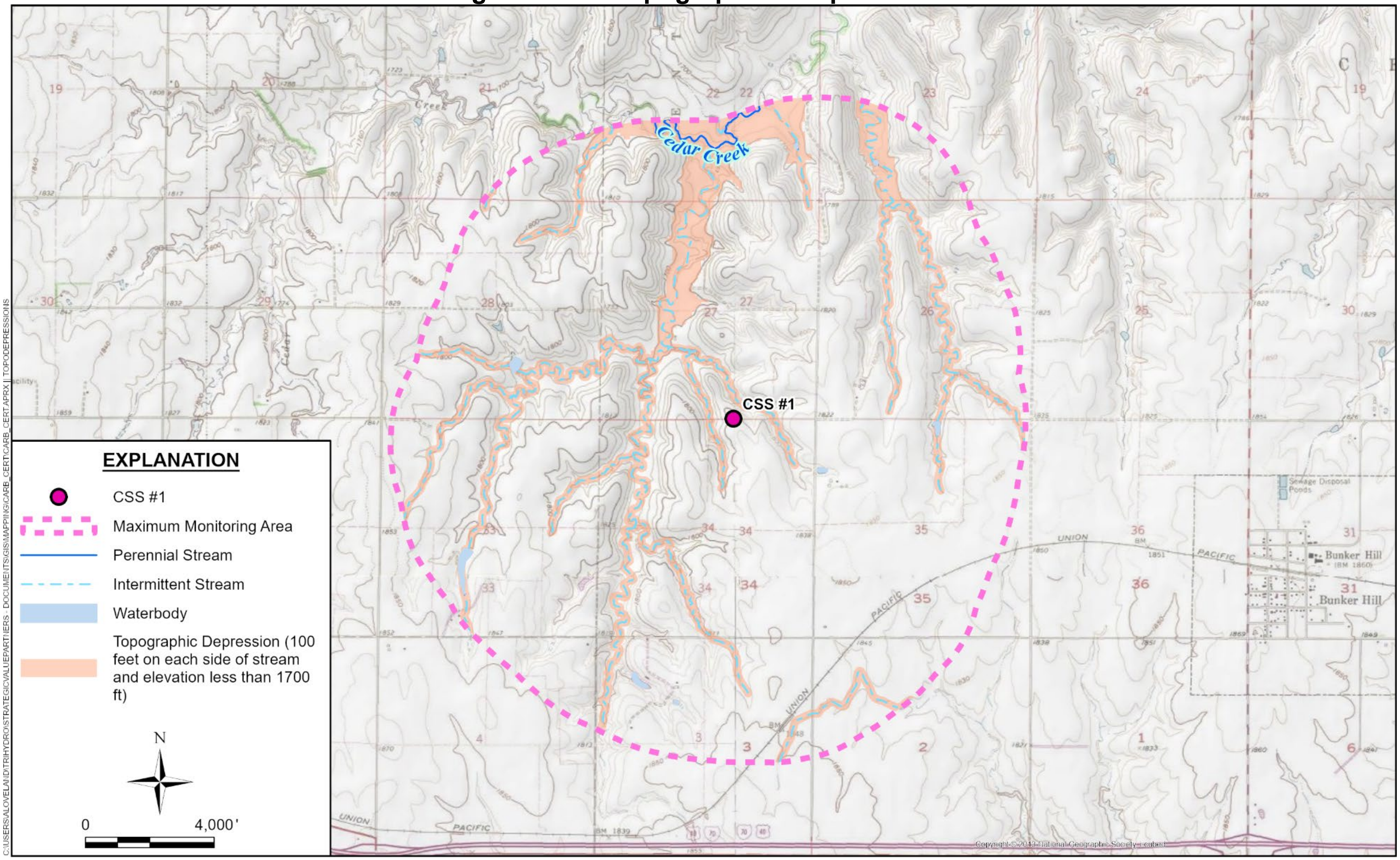
Road and Railroad Infrastructure: Figure H.2-1 and Appendix H.4 - Figure 6 display locations for public roads and railroad infrastructure within the MMA and vicinity. Portions of three public roads (Homer Road, 190th Road, 191st Road) cross the MMA; all three roads are un-paved (i.e., gravel) county roads. The Union Pacific Railroad crosses the SE corner of the MMA.

Pipeline Infrastructure: Figure H.2-1 and Appendix H.4 - Figure 7 display locations for pipelines within the MMA and vicinity. The pipeline providing CO_2 to the injection well is owned and operated by PCC. It is buried for most of its length across the MMA, but a small portion is above surface in proximity to the CSS #1 wellhead. The Jayhawk Pipeline is an operating 1,000-mile crude oil pipeline that is jointly owned by CHS Inc. and Southwest Pipeline Holding Company, LLC, and is operated by Jayhawk Pipeline LLC. The Jayhawk Pipeline transverses the eastern edge of the MMA; it is buried for its entire length across the GS site and vicinity.

Electric Power Infrastructure: The overall project spans the service territories of two electric utilities: the GS site itself lies within the service territory of Rolling Hills Electric Cooperative, Inc., while the upstream PureField ethanol plant and the CO_2 Compression and Dehydration unit for the project lie within the service territory of the City of Russell Electric Department. Figure H.2-1 displays locations for electrical power lines across the GS site. All power lines across the GS site are above ground distribution lines; there are no transmission lines across the GS site.

[1] See program overview at: https://www.usgs.gov/centers/eros/science/national-land-cover-database and the associated Multi-Resolution Land Characteristics Consortium map viewer at: https://www.mrlc.gov/viewer/

Figure H.2-2. Topographical Depressions



H.3. Potential Risk Scenarios

The following events related to the Russell CO_2 Storage Complex that could potentially result in an emergency response:

- Injection or monitoring (verification) well integrity failure;
- Injection well monitoring equipment failure (e.g., shut-off valve or pressure gauge, etc.);
- Fluid (e.g., brine) or CO_2 leakage to a USDW or the surface;
- A natural disaster (e.g., earthquake, tornado, lightning strike); or
- Induced or natural seismic event.

Response actions will depend on the severity of the event(s) triggering an emergency response. "Emergency events" are categorized as shown in Table H.3-1.

Table H.3-1. 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.
Serious 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.

H.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 identified potential risk scenarios are detailed in the subsections that follow.

H.4.1. Well Integrity Failure

Integrity loss of CSS #1 and/or MW #1 may endanger USDWs. Integrity loss may have occurred if one or more of the following events occur:

- CSS #1 Downhole Pressure (PT-0505) reading exceeds the shutdown pressure specified in the permit.
- CSS #1 annulus pressure differential (PT-0504 less PT-0503) falls below the minimum difference specified in the permit.
- Mechanical integrity test at CSS #1 or MW #1 identifies a loss of mechanical integrity.

Pursuant to 40 CFR 146.91(c)(3), PCC must notify the US EPA UIC Program Director within 24 hours of any triggering of a shut-off system (i.e., down-hole or at the surface).

Pursuant to CARB CCS Protocol under the Low Carbon Fuel Standard C.6.(b)(3), PCC must notify the CARB Executive Officer in writing within 24 hours of obtaining evidence any CCS project operations have the potential to endanger public health or the environment.

Severity:

Major, Serious	= Visual or other direct evidence of CO_2 surface leak
Minor	= Potential well integrity failure indicated only by instruments

Timing of event: Injection period, Post-Injection period

Avoidance measures: Planned practices to avoid the scenario include, but are not limited to: injection operations within permitted limits, well maintenance, and implementation of the Testing and Monitoring Plan.

Detection methods: Detection methods described in the Testing and Monitoring Plan include, but are not limited to: Internal Mechanical Integrity Tests, External Mechanical Integrity Tests, Monitoring of Operational Parameters, and Surface CO_2 Monitoring.

Potential response actions:

- Determine the severity of the event based on the information available.
- Notify the US EPA UIC Program within 24 hours – See Appendix H.2.
- Notify CARB within 24 hours – See Appendix H.3.
- For a Major or Serious emergency:
  - Initiate shutdown plan – See Appendix H.1.
  - If contamination is detected, identify and implement appropriate remedial actions (in consultation with the US EPA UIC Program Director and CARB Executive Officer).

- For a Minor emergency:
  - Conduct assessment to determine whether there has been a loss of mechanical integrity.
  - If there has been a loss of mechanical integrity, initiate shutdown plan – See Appendix H.1.

Response personnel: Initial response by site personnel listed in this plan, remediation by PCC and its subcontractors.

Equipment: The exact types of equipment needed for response is to be determined by PCC and its subcontractors and will depend upon the exact nature of the emergency. Equipment may include but is not limited to: a wireline truck, logging instruments for cement and casing, and testing equipment for air and water samples.

H.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 USDWs, public health, or the environment.

Severity:

Major, Serious	= Visual or other direct evidence of a mechanical integrity failure
Minor	= Monitoring equipment fails with no evidence of a mechanical integrity failure

Timing of event: Injection period

Avoidance measures: Planned practices to avoid the scenarios include, but are not limited to: preventative maintenance of monitoring equipment, redundancy within monitoring systems, field inspections of monitoring equipment.

Detection methods: Triggering of alarms within the monitoring system.

Potential Response actions:

- Determine the severity of the event based on the information available.
- Notify the US EPA UIC Program within 24 hours – See Appendix H.2.
- Notify CARB within 24 hours – See Appendix H.3.
- For a Major or Serious emergency:
  - Initiate shutdown plan – See Appendix H.1.
  - Identify and, if necessary, implement appropriate remedial actions (in consultation with the US EPA UIC Program Director and CARB Executive Officer).
- For a Minor emergency:
  - Conduct assessment to determine whether there has been a loss of mechanical integrity.
  - If there has been a loss of mechanical integrity, initiate shutdown plan – See Appendix H.1.

Response personnel: Initial response by site personnel listed in this plan, remediation by PCC and its subcontractors.

Equipment: The exact types of equipment needed for response is to be determined by PCC and its subcontractors and will depend upon the exact nature of the emergency. Equipment may include but is not limited to: a wireline truck, logging instruments for cement and casing, and testing equipment for air and water samples.

H.4.3. Potential Brine or CO_2 Leakage to USDW or the Surface

Elevated concentrations of indicator parameter(s) in groundwater sample(s) or other evidence of fluid (brine) or CO_2 leakage into a USDW.

Severity:

Major, Serious	= Visual or other direct evidence of brine or CO_2 leakage into a USDW or the surface
Minor	= Potential leak of brine or CO_2 only indicated by instruments

Timing of event: Injection period, Post-Injection period

Avoidance measures: Planned practices to avoid the scenario include, but are not limited to: injection operations within permitted limits, well maintenance, and implementation of the Testing and Monitoring Plan.

Detection methods: Detection methods described in the Testing and Monitoring Plan include, but are not limited to: Groundwater Quality and Geochemical Monitoring, Soil Gas Monitoring, Ecosystem Stress Monitoring, and Surface CO_2 Monitoring.

Potential Response actions:

- Determine the severity of the event based on the information available.
- Notify the US EPA UIC Program within 24 hours – See Appendix H.2.
- Notify CARB within 24 hours – See Appendix H.3.
- For a Major or Serious emergency:
  - Initiate shutdown plan – See Appendix H.1.
  - If the presence of indicator parameters are confirmed, develop (in consultation with the US EPA UIC Program Director and CARB Executive Officer) a case-specific work plan to:
    1. Install additional groundwater monitoring points near the affected groundwater well(s) to delineate the extent of impact; and
    2. Remediate unacceptable impacts to the affected USDW.
  - Proceed with efforts to remediate USDW to mitigate any unsafe conditions (e.g., install system to intercept/extract brine or CO_2, or "pump and treat" to aerate CO_2-laden water).
  - Continue groundwater remediation and monitoring on a frequent basis (frequency to be determined by PCC, the US EPA UIC Program Director, and CARB Executive Officer) until unacceptable adverse USDW impact has been fully addressed.

- For a Minor Emergency
  - Conduct assessment to determine whether there has been brine or CO_2 leakage to USDW or the surface.
  - If there has been leakage, initiate shutdown plan – See Appendix H.1.

Response personnel: Initial response by site personnel listed in this plan, remediation by PCC and its subcontractors.

Equipment: The exact types of equipment needed for response is to be determined by PCC and its subcontractors and will depend upon the exact nature of the emergency. Equipment may include but is not limited to: a wireline truck, logging instruments for cement and casing, testing equipment for air and water samples, and groundwater remediation equipment.

H.4.4. Natural Disaster (Except Earthquakes)

Issues may arise as a result of a natural disaster (e.g., tornado, lightning strike, other emergency weather event) affecting the normal operation of the injection well.

Severity:

Major, Serious	= Visual or other direct evidence for loss of CO_2 containment
Minor	= Natural disaster occurred with no direct evidence for loss of CO_2 containment found in the event aftermath

Timing of event: Injection period, Post-Injection period

Avoidance measures: Not applicable

Detection methods: Observations by staff

Potential Response actions: If a natural disaster occurs that affects normal operation of the injection well, perform the following:

- Determine the severity of the event based on the information available.
- Notify the US EPA UIC Program within 24 hours – See Appendix H.2.
- Notify CARB within 24 hours – See Appendix H.3.
- For a Major or Serious emergency:
  - Initiate shutdown plan – See Appendix H.1.
  - If contamination or endangerment is detected, identify and implement appropriate remedial actions (in consultation with the US EPA UIC Program Director and CARB Executive Officer).
- For a Minor emergency:
  - Conduct assessment to determine whether there has been a loss of mechanical integrity.
  - If there has been a loss of mechanical integrity, initiate shutdown plan – See Appendix H.1.

Response personnel: Initial response by site personnel listed in this plan, remediation by PCC and its subcontractors.

Equipment: The exact types of equipment needed for response is to be determined by PCC and its subcontractors and will depend upon the exact nature of the emergency. Equipment may include but is not limited to: a wireline truck, logging instruments for cement and casing, and testing equipment for air and water samples.

H.4.5. Earthquake: Induced or Natural Seismic Event

The plan is aligned with the Kansas Seismic Action Plan used by state-level agencies that regulate Class I through V wells in Kansas. A triggering event is defined as a seismic event of 2.0 M_L or greater (as reported by the PCC dedicated passive seismic network) with an epicenter within a 6-mile radius of CSS #1. A Seismic Action Score (SAS) will be computed for each triggering event; see the Testing and Monitoring Plan for more detail.

Severity: See Table H.4-1.

Timing of event: Injection period, Post-Injection period.

Avoidance measures: Not applicable

Detection methods: Continuous monitoring of regional and dedicated passive seismic networks.

Potential Response actions: See Table H.4-1

Response personnel: Initial response by site personnel listed in this plan, remediation by PCC and its subcontractors.

Equipment: The exact types of equipment needed for response is to be determined by PCC and its subcontractors and will depend upon the exact nature of the emergency. Equipment may include but is not limited to: a wireline truck, logging instruments for cement and casing, and testing equipment for air and water samples.

Table H.4-1. Response to Seismic Events

Seismic Event State	Threshold Condition	Response Action
Green	No triggering events have occurred within past 24 hours	1. Continue with normal operation within permitted levels.
Yellow	One or more triggering events have occurred within the past 24 hours, but no verified triggering event justify a Red seismic event state	1. Continue with normal operation within permitted levels. 2. Notify one or more response personnel within 1 hour of the triggering event the seismic event state of the geologic sequestration project has changed to Yellow.
Red	One or more verified triggering events have occurred within the past 24 hours that are either ≥ 3.5 M_L or SAS ≥ 17	1. Initiate shutdown plan – See Appendix H.1. 2. Notify one or more response personnel within 1 hour of the triggering event the seismic event state of the geologic sequestration project has changed to Red. 3. Notify the US EPA UIC Program Director the shutdown plan was implemented due to a triggering seismic event – See Appendix H.2. 4. Notify the CARB Executive Officer the shutdown plan was implemented due to a triggering seismic event – See Appendix H.3. 5. Limit access to CSS #1 and MW #1 to authorized personnel only. 6. Identify and implement appropriate corrective actions in consultation with the US EPA UIC Program Director and CARB Executive Officer. 7. Re-start operations upon approval of the US EPA UIC Program Director and CARB Executive Officer.
Note: A triggering event is defined as a seismic event of 2.0 M_L or greater (as reported by the PCC dedicated passive seismic network) with an epicenter located within a 6-mile radius of CSS #1. A verified triggering event is a triggering event that has be validated by a qualified human seismologist in order to eliminate false-positive indications generated by the automated monitoring systems.		

H.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. Chief Executive Officer
2. Vice President of Operations
3. Plant Manager
4. Operations Manager
5. Maintenance Manager
6. Environmental Health and Safety Manager

A contact list containing names, phone numbers, and email addresses for site personnel to be notified in case of emergency is provided as a supporting document in the Geologic Sequestration Data Tool (GSDT) Project Plan Submissions module for the plan submitted to US EPA and within the Section I:11 Attachments for the plan submitted to CARB. The site personnel contact list will be reviewed annually, and an updated contact list will be provided to the US EPA UIC Program Director and the CARB Executive Officer when changes are made.

Table H.5-1. Contact information for Key Local, State, and Other Authorities

Entity	Phone Number
Police	
Emergency	911
Main – City of Russell (non-emergency)	(785) 483-2121
Main – Russell County Sheriff (non-emergency)	(785) 483-2151
Main – Kansas Highway Patrol (non-emergency)	(785) 296-6800
Fire	
Emergency	911
Main – City of Russell (non-emergency)	(785) 483-7111
Ambulance	
Emergency	911
Russell County EMS & Ambulance (non-emergency)	(785) 445-3720
Kansas Division of Emergency Management	
Spill and All Hazards (24-hour)	(785) 291-3333
US EPA National Response Center (24-hour)	(800) 424-8802

Entity	Phone Number
Union Pacific Railroad Emergency Main (non-emergency)	 (888) 877-7267 (888) 870-8777
USDI (Operator for Project CO2 Pipeline) Emergency Main (non-emergency)	 (618) 392-5502 (316) 305-6464
Jayhawk Pipeline, LLC Emergency Main (non-emergency)	 (888) 542-9575 (855) 424-7747
Rolling Hills Electric Cooperative, Inc. Emergency Main (non-emergency)	 (785) 534-1601 (785) 534-1601
City of Russell Electric Department	(785) 483-6311
US EPA Region 7 UIC Program Ben Meissner 11201 Renner Blvd. Lenexa, KS 66219 Email: Meissner.Benjamin@epa.gov Nicholas Laskares (Alternate Contact) 11201 Renner Blvd. Lenexa, KS 66219 Email: Laskares.Nicholas@epa.gov	 (913) 551-7992 (913) 551-7166
CARB Executive Officer Hon. Steven S. Cliff, Ph.D. 1001 I Street Sacramento, CA 95814 Email: CCS@arb.ca.gov Gavin Hoch (Alternate Contact) 1001 I Street Sacramento, CA 95814 Email: Gavin.Hoch@arb.ca.gov	 (800) 242-4450 (279) 208-7524

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, PCC shall be responsible for its procurement.

H.6. Emergency Communications Plan

PCC will communicate to the public about any event that requires an emergency response to ensure that the public understands what happened and whether or not there are any environmental or safety implications. The amount of information, timing, and communications method(s) will be appropriate to the event, its severity, whether any impacts to drinking water or other environmental resources occurred, any impacts to the surrounding community, and their awareness of the event.

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

PCC will also communicate with entities who may need to be informed about or take action in response to the event, including local water systems, CO_2 source(s) and pipeline operators, land owners, and Regional Response Teams (as part of the National Response Team).

H.7. Plan Review

This ERRP shall be reviewed:

- At least once every five years following its approval by the US EPA UIC Program and the CARB Permanence Certification program;
- Within one year of an area of review reevaluation;
- Within a prescribed period (to be determined by the permitting agencies) following any significant changes to the injection process or the injection facility, or an emergency event; or
- As required by the permitting agencies.

If the review indicates that no amendments to the ERRP are necessary, PCC will provide the permitting agencies with the documentation supporting the "no amendment necessary" determination.

If the review indicates that amendments to the ERRP are necessary, amendments shall be made and submitted to the permitting agencies within six months following an event that initiates the ERRP review procedure.

H.8. Staff Training and Exercise Procedures

All PCC employees and subcontractors that are covered by contractual agreements with PCC performing tasks outlined in this ERRP need to meet the initial training requirements outlined in the Occupational Safety and Health Administration regulations 29 CFR 1910.120(e)(3). The best solution is for employees and subcontractors to have certification in the 40-hour HAZWOPER course and, if staff will be performing supervisory duties, the 8-hour supervisor's course.

PCC employees/subcontractors involved with operations, maintenance, and supervision of CO_2 equipment (e.g., transport pipeline) will undergo detailed Hazardous Liquid training in compliance with requirements of the U.S. Department of Transportation Pipeline and Hazardous Materials Safety Administration under 49 CFR Part 195. Such training will occur on an annual basis (or at intervals not exceeding 15 months).

First responders and PCC employees/subcontractors subject to training under 49 CFR Part 195 will undergo Emergency Response training, table top drills, or other equivalent events. Such training will occur on an annual basis (or at intervals not exceeding 15 months).

Appendix H.1. Shutdown Plan

Appendix H.1. Shutdown Plan

The phrase "initiate shutdown plan" in most instances means to execute an emergency shutdown of the injection well using the procedures outlined in this appendix. However, in some circumstances and in consultation with the US EPA UIC Program Director and the CARB Executive Officer, PCC will determine whether a gradual cessation of injection is appropriate and execute such a gradual cessation following the routine shutdown procedure provided in Section A.III.2 of Summary of Requirements.

The following steps will be taken to execute an emergency shutdown of the injection well and upstream equipment:

1. Shut-in injection well CSS #1:
    a. Close automatic shut-in valve SDV-0502.
    b. Place pipeline pressure control into manual mode and close PCV-0501.
2. Initiate shutdown sequence for compression and pipeline facilities:
    a. Place compression facility into recycle mode. Note: This should happen automatically if the compression facility is operating with all control loops in auto mode; operator actions are needed if control system is in manual mode.
    b. Follow normal procedures for full shutdown of compression and pipeline facilities if CSS #1 is expected to be shut-in for an extended period.
3. Communicate emergency situation to PCC site personnel; Limit access to CSS #1 to authorized personnel only.
4. Determine the extent of the emergency by monitoring operating parameters for CSS #1 (e.g., pressures, temperatures) and other relevant systems as dictated by the nature of the emergency.
5. If the incident is sufficiently severe, contact local authorities to initiate evacuation plans.

Appendix H.2. Notification of US EPA UIC Program

Appendix H.2. Notification of US EPA UIC Program

1. Within 24-hr of discovery:
   a. Call US EPA Region 7 UIC Program Director (see Table H.5-1), leave message if no answer.
   b. If US EPA Region 7 UIC Program Director did not answer call, then call Alternate Contact (see Table H.5-1), leave message if no answer.
   c. Create incident letter from template (see Appendix H.2 - Figure 1)
      i. Complete the Word template to describe the incident.
      ii. Convert to Adobe Acrobat file (.pdf) for electronic submissions.
   d. Email electronic copy of incident letter to US EPA Region 7 UIC Program Director and cc: to Alternate Contact.
2. Within one (1) business day of discovery, submit an electronic copy of the incident letter into the project US EPA GSDT account as follows:
   a. Authorized Individual to sign into project GSDT account.
   b. Open Injection and Post-Injection Reporting Tool, click the checkbox on the Welcome tab if asserting a PBI claim.
   c. Navigate to the Emergency and Remedial Response Tab.
   d. Click “Create New Notification Tab” (see Appendix H.2 - Figure 2)
   e. Select appropriate checkbox for Type of Emergency Event. Click the PBI checkbox if asserting a PBI claim.
   f. Upload electronic copy of incident letter in box below Emergency Notification Letter. Click the checkbox if asserting a PBI claim.
   g. Complete box with the Notification Letter Date. Click the checkbox if asserting a PBI claim.
   h. Check appropriate radio button for Are You Providing Any Follow-up Materials at this Time? If “Yes” then upload files and provide a brief description of file contents. Click the checkbox if asserting a PBI claim.
   i. Click “Save Changes and Exit” the bottom of the reporting tool window.
   j. Close GSDT window

Appendix H.2 - Figure 1. Incident Letter Template for US EPA Notification

PureField CARBON CAPTURE
1224 E 15th St. | Russell, KS 67665 | 785-261-0355 | PureField.com

<insert CONFIDENTIAL BUSINESS INFORMATION if asserting a PBI claim>

<insert date>

Mr. Neftali Hernandez-Santiago – Section Supervisor
US EPA Region 7 UIC Program
11201 Renner Blvd.
Lenexa, KS 66219

Sent by Email: Neftali-Santiago.neftali@epa.gov
Submitted via GSDT Injection and Post-Injection module

SUBJECT: Notification of Emergency Event at PureField's Russell CO_2 Storage Complex

Dear Mr. Hernandez-Santiago:

This letter provides notification that the emergency event listed below occurred on <insert incident date> at the PureField Carbon Capture, LLC Russell CO_2 Storage Complex (Project ID: R07-KS-005; UIC Facility No.: KSS167570001):

Type of Emergency Event (Mark "X" by all that apply):

_____ Evidence of USDW endangerment
_____ Noncompliance with a permit condition
_____ Triggering of a shut-off system
_____ Failure to maintain mechanical integrity
_____ Release of CO_2 to the atmosphere or biosphere
_____ Other

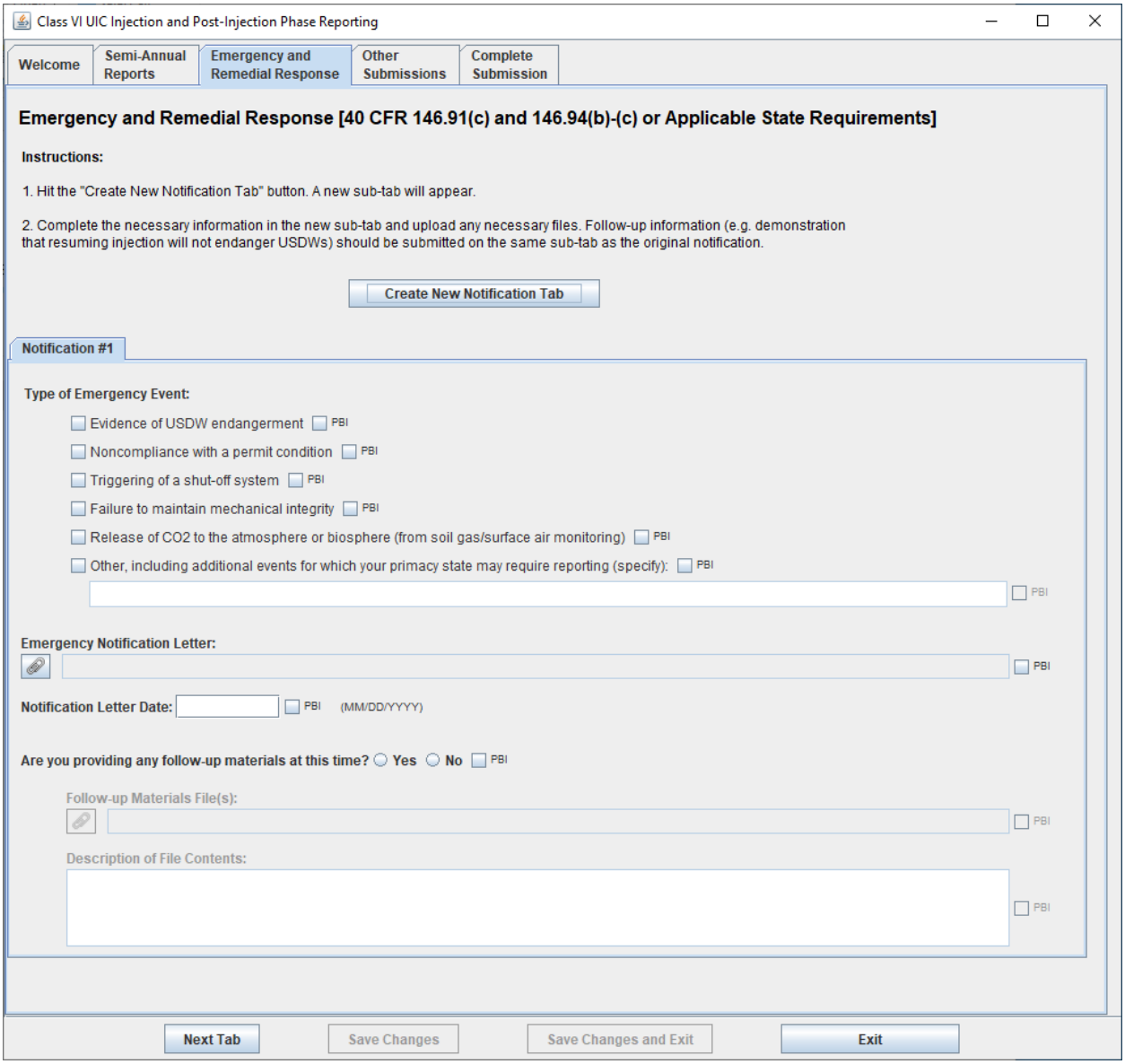
<Insert brief description of incident and emergency response actions>

Sincerely,

<insert name & title>

cc: Ben Meissner (US EPA Region 7 UIC Program) Meissner.Benjamin@epa.gov
Nickolas Laskares (US EPA Region 7 Alternate Contact) Laskares.Nicholas@epa.gov
GSDT account for PureField Carbon Capture (Project ID: R07-KS-005)

Appendix H.2 - Figure 2. GSDT Reporting Tool for US EPA Notification



Appendix H.3 Notification of CARB

Appendix H.3 Notification of CARB

1. Within 24-hr of discovery:
   a. Call CARB Executive Officer (see Table H.5-1), leave message if no answer.
   b. If CARB Executive Officer did not answer call, then call Alternate Contact (see Table H.5-1), leave message if no answer.
   c. Create incident letter from template (see Appendix H.3 - Figure 1).
      i. Complete the Word template to describe the incident.
      ii. Convert to Adobe Acrobat file (.pdf) for electronic submissions.
   d. Email electronic copy of incident letter to CARB Executive Officer and cc: to Alternate Contact.
2. Within one (1) business day of discovery, submit an electronic copy of the incident letter into the project Alternative Fuels Portal (AFP) account as follows:
   a. Authorized Individual to sign into project AFP account
   b. Navigate to the Correspondence Tab (see upper panel of Appendix H.3 - Figure 2) and select the appropriate Facility Name from the drop down
   c. Click “New Post” button and a new window similar to the one shown in lower panel of Appendix H.3 Figure 2 should appear
   d. Leave drop downs for Legacy Tier 1 App. #, Legacy Tier 2 App. #, and Application Number at their default values
   e. Complete Subject/Topic box with “Incident Letter”
   f. Complete Comments box with “See attached letter”
   g. Click “Choose File” button to upload electronic copy of incident letter
   h. Click “Save” button
   i. Click “Submit” button
   j. Close AFP window

Appendix H.3 - Figure 1. Incident Letter Template for CARB Notification

PureField CARBON CAPTURE
1224 E 15th St. | Russell, KS 67665 | 785-261-0355 | PureField.com

<insert CONFIDENTIAL BUSINESS INFORMATION if asserting a confidentiality claim>

<insert date>

Hon. Steven S. Cliff, Ph.D. – Executive Officer
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Sent by Email: CCS@arb.ca.gov
Submitted via Alternative Fuels Portal

SUBJECT: Notification of Emergency Event at PureField's Russell CO_2 Storage Complex

Dear Dr. Cliff:

This letter provides notification that the emergency event listed below occurred on <insert incident date> at the PureField Carbon Capture, LLC Russell CO_2 Storage Complex:

Type of Emergency Event (Mark "X" by all that apply):

_____ Evidence of USDW endangerment
_____ Noncompliance with a permit condition
_____ Triggering of a shut-off system
_____ Failure to maintain mechanical integrity
_____ Release of CO_2 to the atmosphere or biosphere
_____ Other

<Insert brief description of incident and emergency response actions>

Sincerely,

<insert name & title>

cc: Gavin Hoch (CARB Alternate Contact) Gavin.Hoch@arb.ca.gov
AFP account for PureField Carbon Capture (Company ID: C1219, Facility ID: F00555)

Appendix H.3 - Figure 2. AFP Reporting Tool for CARB Notification

Upper Panel: Correspondence Tab; Lower Panel: New Post Form