Application Number: 45054
Plan Revision: December 2025

ATTACHMENT I

EMERGENCY AND REMEDIAL RESPONSE PLAN [LAC 43:XVII.3623.A.1, and 40 CFR 146.94(a)]

1. FACILITY INFORMATION

Facility name: River Parish Sequestration – RPN 1

Facility contact: Andrew Chartrand, VP, Regulatory and Environmental
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832-696-0052, andrew.chartrand@blueskyinfrastructure.com

Well name/location:

Well	Parish/State	Latitude (NAD27)	Longitude (NAD27)
RPN-1-INJ	Ascension, LA	30° 6' 09.04" N	91° 3' 45.37" W

The Emergency and Remedial Response Plan (ERRP) describes actions that River Parish Sequestration, LLC (RPS) will take to address the movement of injection fluid or formation fluid in a manner that may endanger an underground source of drinking water (USDW) during the construction, operation, or post-injection site care periods for the proposed RPN-1-INJ injection well. The ERRP is provided to meet the requirements of LAC 43:XVII.3623, and 40 Code of Federal Regulations (CFR) 146.94 Emergency and Remedial Response. RPS has submitted a Testing and Monitoring Plan (**Attachment F**) that describes, in detail, the methods and type of data that RPS will collect to track the movement of carbon dioxide (CO_2)/brine and pressure front in the storage complex.

If RPS obtains evidence that the injected CO_2 stream and/or associated pressure front may cause an endangerment to a USDW, human health and safety, and/or the environment, RPS will perform the following actions:

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

Where the phrase “initiate shutdown plan” is used, the following protocol will be employed: RPS would most likely immediately cease injection or, after consultation with the UIC Director, RPS could determine that a gradual cessation of injection rather than an immediate shutdown (using the parameters set forth in the Summary of Requirements of the Class VI permit) is appropriate.

2. LOCAL RESOURCES AND INFRASTRUCTURE

The RPS facility is located in an area of agricultural land, mainly sugarcane fields, approximately 2.2 miles west of the Mississippi River. Resources in the vicinity of RPN-1-INJ or within its

associated Area of Review (AoR) that may be affected because of an emergency event at the project site include the following:

1. Towns near RPN-1-INJ (distances measured from well to the town center):
    - Bruly St Martin, located approximately 4.4 miles southwest;
    - Belle Rose located approximately 3.5 miles south;
    - Magnolia located approximately 6.5 miles south;
    - Paincourtville located approximately 6.5 miles south;
    - Donaldsonville located approximately 4.3 miles east;
    - Darrow located approximately 5.0 miles northeast; and
    - White Castle located approximately 6.8 miles northeast.
2. USDWs within AoR.

USDWs within the AoR are recent alluvium and Pleistocene formations. The Mississippi River Alluvial Aquifer, the shallowest primary source of freshwater within the region, exists in eastern Iberville Parish, western Ascension Parish, and most of Assumption Parish. Methods of recharge for the aquifer include surface rain and the Mississippi River.

The Pleistocene Norco Aquifer is the shallowest USDW of the Chicot aquifer system of the Ascension Parish region and is predominantly freshwater except in the southwestern portion of the Parish, west of the Mississippi River.

The Gonzales-New Orleans aquifer and the Pleistocene 1,200-Foot Sand are interpreted to be saline within the AoR. A detailed discussion on the hydrogeology of the Storage Site is described in **Section 2.7** of the **Application Narrative**.

RPS identified and interpreted the lowermost USDW on 40 wells with shallow spontaneous potential and resistivity logs following the C&E interpretation criteria, which relates resistivity log response to the EPA-defined formation water salinity threshold of 10,000 milligrams per liter of total dissolved solids.

Infrastructure in the vicinity of the RPS Project that may be affected because of an emergency at the project site include RPS's injection wellhead(s) and surface facilities. Resources and infrastructure addressed in this plan are shown in **Figure 1**.

3. POTENTIAL RISK SCENARIOS

The following events related to the RPS Project could potentially result in an emergency response:

- Injection well integrity failure
- Injection well monitoring equipment failure (e.g., shut-off valve or pressure gauge)
- Fluid (e.g., brine) or CO_2 leakage to a USDW or the land surface
- A natural disaster (e.g., tornado, flooding, lightning strike) impacting injection or monitoring equipment

- Induced or natural seismic event

Response actions will depend on the severity of the event(s) triggering an emergency response. Emergency conditions were ranked by comparing the risk categories of people, assets, environment, and governance with severity of event and likelihood of occurrence (**Table 1**).

Table 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 little to no immediate risk to human health, resources, or infrastructure.

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. Actionable limits located in the **Quality Assurance and Surveillance Plan** will be used to assist in ranking the severity of an event. The potential risk scenarios are detailed below.

4.1. Well Integrity Failure

Integrity loss of the injection well may endanger USDWs. Integrity loss may have occurred if the following events happen:

- Automatic shutdown devices are activated.
    - Wellhead pressure exceeds the specified shutdown pressure specified in the permit.
    - Annulus pressure indicates a loss of external or internal well containment.
- Mechanical integrity test (MIT) results identify a loss of mechanical integrity.

4.1.1. Severity:

- Minor emergency (e.g., if a shutoff is triggered by mechanical or electrical malfunctions)
- Serious or Major emergency (e.g., triggered alarms from automatic shut-in of CO_2 into or from injection well or a failed MIT)

4.1.2. Timing of event:

Injection phase.

4.1.3. Avoidance measures:

- Well Construction: RPS's well design and construction will consist of several barriers above the primary upper confining layer to separate USDWs from CO_2 in the injection tubing. The barriers include compatible steel conductor pipe, surface casing, production casing from surface through the injection intervals and tubing with packer and polish bore

receptacle isolating the injection interval. All casing strings are cemented to surface with acid resistant cement across and above both the injection and upper confining interval. This design provides a minimum of four physical barriers between the CO_2 injection stream and any USDW interval.

- Well Recompletion: The wellbore design allows for the progressive recompletion of each zone to the next to be performed with minimal potential for damage to the wellbore during recompletion operations. The packer and tubing will not need to be pulled out of the hole and the plugging of the lower zone and re-completion of the next zone can be done with a wireline unit. The design will also allow for the continuous monitoring of the casing and tubing annulus to ensure wellbore mechanical integrity is maintained.
- Operations: RPS will operate within the permit limits through automated surface monitoring and visual equipment inspections to avoid or identify early signs of integrity issues. RPS will install aboveground automatic shutoff valves, a subsurface safety valve, and alarms that will be triggered by pressures or flow beyond permitted operating limits that occur either upstream or downstream of the valves, as well as check valves to prevent flow in a direction opposite to the intended design. RPS will maintain wellbore integrity and isolation of CO_2 to the permitted injection zone by means of appropriate material selection, continuous pressure and temperature monitoring, and routine operational surveillance and logging.

4.1.4. Detection methods:

Pressure and flow rate monitoring, MITs, and/or groundwater analyses.

4.1.5. Potential response actions:

If a well integrity failure occurs, perform the following:

- Notify the UIC Director and EPA within 24 hours of the emergency event, per LAC 43:XVII.3629.A.3, and 40 CFR 146.91(c). Notify appropriate state and local agencies as required.
- Identify the location, nature, and extent of damage (if any) to the well or wellhead.
- Determine the severity of the event, based on the information available, within 24 hours of notification.

If the situation is a Minor emergency, perform necessary repairs. If the situation is a Major or Serious emergency, perform the following:

- Initiate shutdown plan, in consultation with the UIC Director.
- Initiate the Incident Command System and begin staffing an Incident Management Team.
- Use handheld equipment to measure CO_2 levels in ambient air, then isolate and restrict access as appropriate.
- Continuously monitor the well site, well pressure, temperature, and annulus fluid level and annulus pressure to assess integrity loss and determine the root cause of failure.

- Perform appropriate repairs and confirm internal and external mechanical integrity prior to restarting injection upon approval from the UIC Director. Notify UIC Director and EPA when injection can be expected to resume.
- Monitor CO_2 and indicator parameter levels, as appropriate, in groundwater monitoring wells.
- Based on analytical results and observations, a case-specific work plan may be developed in consultation with the UIC Director and may include, but not be limited to, additional groundwater monitoring and evaluation of further actions.

4.1.6. Response personnel:

The following response personnel will be dispatched in case of a Major or Serious emergency:

RPS Project Engineer(s), Field Safety Manager(s), Health, Safety, and Environment (HSE) Manager(s), Field Superintendent, Incident Response Team, and Contractors.

4.1.7. Equipment:

Required equipment will be selected based on the event-specific evaluations performed and may include, but are not limited to, drilling rig, workover rig, or coiled tubing unit; wireline and logging equipment; slickline; and well control equipment.

4.2. Injection Well Monitoring Equipment Failure

The failure of monitoring equipment for wellhead pressure, temperature, and/or annulus pressure may indicate a potential issue with the injection well that could endanger USDWs. This loss of data may affect the ability to demonstrate injection well mechanical integrity.

4.2.1. Severity:

- Minor emergency (e.g., loss of sensor or monitoring data, but other data sources are sufficient to demonstrate injection well mechanical integrity)
- Serious emergency (e.g., loss of sensor or monitoring data, and other data sources are not sufficient to demonstrate injection well mechanical integrity)

4.2.2. Timing of event:

Injection and post-injection phases.

4.2.3. Avoidance measures:

Regular site and equipment inspections and prompt maintenance, manned-remote monitoring, equipment updates and calibration.

4.2.4. Detection methods:

Observed anomalies in monitoring data or visual inspections of monitoring and measuring equipment.

4.2.5. Potential Response actions:

If an injection well monitoring equipment failure occurs, perform the following:

- Notify the UIC Director and EPA within 24 hours of the emergency event, per LAC 43:XVII.3629.A.3, and 40 CFR 146.91(c). Notify appropriate state and local agencies as required.
- Identify the nature of the malfunction.
- Determine the severity of the event, based on the information available, within 24 hours of notification.

If the situation is a Minor emergency, perform necessary reset/repair or replacement of sensor/monitoring devices.

If the situation is a Serious emergency, perform the following:

- Initiate shutdown plan, in consultation with the UIC Director.
- Notify RPS Field Superintendent and HSE Manager(s)
- Identify the location, nature, and extent of the failure; reset/repair, or replace sensor/monitoring devices; and/or confirm internal and external well integrity prior to restarting injection (upon approval of the UIC Director).
- If a loss of mechanical integrity is determined, use response actions described in "Well Integrity Failure" Section.

4.2.6. Response personnel:

The following response personnel will be dispatched in case of a Serious emergency:

RPS Project Engineer(s), Field Safety Manager(s), HSE Manager(s), Field Superintendent, Incident Response Team, and Contractors.

4.2.7. Equipment:

Required equipment will be selected based on the event-specific evaluations performed.

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

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

4.3.1. Severity:

- Major emergency: evidence that fluid or CO_2 has potentially migrated from the injection zone into a potential USDW.

4.3.2. Timing of event:

Injection and post-injection phases.

4.3.3. Avoidance measures:

- The project site has been carefully evaluated and is suitable for the project activities, as described in Site Characterization **Section 2** of the **Application Narrative**.
- Detailed evaluations of artificial penetrations within the AoR have been performed (**Table 2**).

Table 2: Artificial penetrations within the AoR

Well Name	Location
None	No artificial penetrations through the confining layers were identified.

- Injection wells will operate within the established permit limits (**Section 7** of the **Application Narrative**).
- Rigorous monitoring will be performed during injection and post-injection phases (**Attachments F** and **H**).

4.3.4. Detection methods:

Comprehensive groundwater monitoring is detailed in the Testing and Monitoring Plan (**Attachments F**).

4.3.5. Potential Response actions:

If a potential brine or CO_2 leakage to USDW or the surface occurs, perform the following:

- Notify the UIC Director and EPA within 24 hours of the emergency event, per LAC 43:XVII.3629.A.3, and 40 CFR 146.91(c). Notify appropriate state and local agencies as required.
- Initiate shutdown plan, in consultation with the UIC Director.
- Notify RPS Field Superintendent and HSE Manager(s)
- Initiate the Incident Command System and activate the Incident Management Team (IMT). The IMT is composed of corporate decision makers composed of the following principal components: command, planning, finance, regulatory, legal, compliance, operations, and logistics. The IMT, once fully staffed, is designed to cover all aspects of a comprehensive and prolonged incident response. The number of positions/personnel required to staff the IMT will depend on the size and complexity of the incident. During a prolonged response, additional personnel may be cascaded in, and more than one level within the Team may be involved to sustain 24-hour operations.
- Evaluate the nature, extent, and cause(s) of the potential leak.
- Determine the severity of the event, based on the information available, within 24 hours of notification.

- If the presence of indicator parameters are confirmed, develop (in consultation with the UIC Director, and other state and local agencies as required) a case-specific work plan that may include, but may not be limited to, the following:
    - Performing a CO_2 isotope test to verify whether the CO_2 is from the RPS Storage Site.
    - Performing additional groundwater monitoring to evaluate the extent of impacts.
    - Evaluating further actions, which may include infrastructure repairs/modifications.
- If the source of the release is suspected to be an active or abandoned well, corrective action will be performed.
- If faults or confining zone failure are the suspected leakage pathways, geophysical surveys will be conducted to locate the source of the leak. Next steps will be proposed and developed in coordination with the UIC Director and EPA.
    - If a loss of mechanical integrity is determined, use response actions described in the "Well Integrity Failure" Section.
- Evaluating whether groundwater remediation is required:
    - If required, evaluate and perform groundwater remediation and conduct monitoring on a frequency to be determined by RPS in consultation with the UIC Director, until impacts have been mitigated.

4.3.6. Response personnel:

The following response personnel will be dispatched in case of a Major or Serious emergency:

RPS Project Engineer(s), Field Safety Manager(s), HSE Manager(s), Field Superintendent, Incident Response Team, and Contractors

4.3.7. Equipment:

Required equipment will be selected based on the event-specific evaluations performed**.**

4.4. Natural Disaster

Well problems (integrity loss, leakage, or malfunction) may arise as a result of a natural disaster affecting the normal operation of the injection well. Weather-related disasters (e.g., flooding, tornado, or lightning strike) may affect surface facilities.

4.4.1. Severity:

- Minor emergency (e.g., lightning strike or minor flooding with little to no risk or interruption in operations)
- Serious or Major emergency (e.g., tornado, flooding, or lightening requiring operational shut down and/or causing significant damage to equipment)

4.4.2. Timing of event:

Injection and post-injection phases.

4.4.3. Avoidance measures:

- Lightning: install adequate lightning protection system, as appropriate.
- Hurricanes/tropical storms and tornados: monitor weather systems and secure facility and equipment as appropriate.
- Flooding: monitor river levels and weather systems and secure facility and equipment as appropriate.

4.4.4. Detection methods:

Visual and automatic shutoff valves and alarms.

4.4.5. Potential response actions:

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

- Notify the UIC Director and EPA within 24 hours of the emergency event, per LAC 43:XVII.3629.A.3, and 40 CFR 146.91(c).
- Determine the severity of the event, based on the information available, within 24 hours of notification.
- Coordinate with emergency responders and other state and local agencies on emergency response actions.

For a Minor emergency, perform the following:

- Coordinate with RPS Field Manager
- Follow appropriate instructions from management team and continue operations.

For a Major or Serious emergency, perform the following:

- Initiate shutdown plan.
- Notify RPS Field Superintendent and HSE Manager(s)
- When the Incident Management Team has communicated it is safe to do so, perform the following:
    - If a loss of mechanical integrity is known or suspected, follow response actions described in the “Well Integrity Failure” Section.
    - If sensor/monitoring equipment failures are known or suspected, follow response actions described in the “Injection Well Monitoring Equipment Failure” Section.
    - If a potential brine or CO_2 release to a USDW is known or suspected, follow response actions described in the “Potential Brine or CO_2 Leakage to USDW or the Surface” Section.

4.4.6. Response personnel:

The following response personnel will be dispatched in case of a Major or Serious emergency:

RPS Project Engineer(s), Field Safety Manager(s), HSE Manager(s), Field Superintendent, Incident Response Team, and Contractors.

4.4.7. Equipment:

Required equipment will be selected based on the event-specific evaluations performed**.**

4.5. Induced or Natural Seismic Event

Natural and induced seismic events have the potential to affect injection and monitoring wells and equipment. However, based on the regional geology and project operating conditions, it is considered unlikely that a natural event would affect this part of the Gulf Coast and unlikely that an induced event associated with injection operations would ever induce a seismic event outside of the AoR. This portion of the response plan is developed for a seismic event with an epicenter within the AoR that meets the severity parameters of a major operating state. The operating state will be determined from the observed thresholds for Magenta and Red Operating States.

4.5.1. Severity:

- Major: Operating state RED/MAGENTA
- Serious: Operating state ORANGE/YELLOW
- Minor: Operating state GREEN

4.5.2. Timing of event:

Injection and post-injection phases.

4.5.3. Avoidance measures:

Fault stability analysis and appropriate operating conditions as described in **Sections 2.3** and **7.1** of the **Application Narrative** and seismic monitoring as described in the Testing and Monitoring Plan (**Attachment F**).

4.5.4. Detection methods:

RPS will conduct induced seismicity monitoring to detect seismic events smaller than +1.0 moment magnitude across the RPS North fairway to depths exceeding 30,000 ft, as described in the QASP. RPS will also follow USGS Earthquake Hazards Program for any reported earthquakes >2.5 moment magnitude within 10 miles of the injection well.

4.5.5. Potential response actions:

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

Table 3: Seismic monitoring system, for seismic events > M1.5 with an epicenter within AoR of the injection well

Operating State	Threshold Condition[1, 2]	Response Action[3]
Green	Seismic events less than or equal to M1.5	1. Continue normal operation within permitted levels.
Yellow	5 or more seismic events within a 30-day period having a magnitude greater than M1.5 but less than or equal to M2.5	1. Continue normal operation within permitted levels. 2. Within 24 hours of the incident, notify the UIC Director and EPA of the operating status of the well.
Orange	Seismic event greater than M1.5 and local observation or felt report Seismic event greater than M2.5 and no felt report	1. Continue normal operation within permitted levels. 2. Within 24 hours of the incident, notify the UIC Director and EPA of the operating status of the well. 3. Review seismic and operational data. 4. Report findings to the UIC Director and EPA and issue corrective actions.
Magenta	Seismic event greater than M2.5 and local observation or report	1. Inspect injection well, monitoring equipment, and associated infrastructure. 2. If inspection reveals facility damage such that injection rates should be reduced or ceased, initiate rate reduction or shutdown plan. 3. Vent CO_2 from surface facilities. 4. Within 24 hours of the incident, notify the UIC Director and EPA of the operating status of the well. 5. Limit access to wellhead to authorized personnel only. 6. Communicate with facility personnel and local authorities to initiate evacuation plans, as necessary. 7. Monitor well pressure, temperature, and annulus pressure to verify well status and determine the cause and extent of any failure; identify and implement appropriate remedial actions (in consultation with the UIC Director). 8. Determine if leaks to ground water or surface water occurred. 9. If USDW contamination is detected, notify the UIC Director and EPA within 24 hours of the determination. 10. Review seismic and operational data. 11. Report findings to the UIC Director and EPA and issue corrective actions.
Red	Seismic event greater than M2.5, and local observation or report, and local report and confirmation of damage[4]	1. Inspect injection well, monitoring equipment, and associated infrastructure. 2. If inspection reveals facility damage such that injection rates should be reduced or ceased, initiate rate reduction or shutdown plan.

Operating State	Threshold Condition[1, 2]	Response Action[3]
	Seismic event >M3.5	3. Vent CO_2 from surface facilities. 4. Within 24 hours of the incident, notify the UIC Director and EPA of the operating status of the well. 5. Limit access to wellhead to authorized personnel only. 6. Communicate with facility personnel and local authorities to initiate evacuation plans, as necessary. 7. Monitor well pressure, temperature, and annulus pressure to verify well status and determine the cause and extent of any failure; identify and implement appropriate remedial actions (in consultation with the UIC Director). 8. Determine if leaks to ground water or surface water occurred. 9. If USDW contamination is detected, notify the UIC Director within 24 hours of the determination. 10. Review seismic and operational data. 11. Report findings to the UIC Director and issue corrective actions.

1. Specified magnitudes refer to magnitudes determined by United States Geological Survey (USGS) seismic monitoring stations or reported by the USGS National Earthquake Information Center using the national seismic network.
2. "Felt report" and "local observation and report" refer to events confirmed by local reports of felt ground motion or reported on the USGS "Did You Feel It?" reporting system.
3. Reporting findings to the UIC Program Director and issuing corrective action will occur within 25 business days (five weeks) of change in operating state.
4. Onset of damage is defined as cosmetic damage to structures, such as bricks dislodged from chimneys and parapet walls, broken windows, and fallen objects from walls, shelves, and cabinets.
M: magnitude

4.5.6. Response personnel:

The following response personnel will be dispatched in case of a Major or Serious emergency:

RPS Project Engineer(s), Field Safety Manager(s), HSE Manager(s), Field Superintendent, Incident Response Team, and Contractors.

4.5.7. Equipment:

Required equipment will be selected based on the event-specific evaluations performed**.**

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 is as follows (not listed in order of notification):

- Project Engineer(s)
- Field Safety Manager(s)
- HSE Manager(s)
- Field Superintendent

A site-specific emergency contact list will be developed and maintained during the life of the project. RPS will provide the current site-specific emergency contact list to C&E's UIC Director (**Table 4**).

Table 4: Contact information for key local, state, and other authorities

Agency	Phone Number
Ascension Parish President	(225) 450-1200
Ascension Parish Sheriff: Donaldsonville	(225) 473-8671
Louisiana State Police	(225) 754-8500
LDEQ (Baton Rouge) 24-Hour Hotline	(225) 342-1234
Environmental services contractor	TBD
EPA UIC Region 6 Program Director/Manager of GW & UIC, Ken Johnson	(214) 665-7252
C&E UIC Director	(225) 342, 5569
EPA National Response Center (24 hours)	800-424-8802
USEPA, Region VI Emergency Response Hotline	(913) 551-7003 / (800) 223-0425
LDEQ: Louisiana Department of Environmental Quality, Single Point of Contact	(225) 342-1234

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, RPS shall be responsible for its procurement.

Prior to the commencement of carbon dioxide injection, the RPS shall provide a copy of the approved ERRP to the parish president, police jury president, or mayor-president, depending on the form of perish government, for each parish within the area of review for dissemination to the office of homeland security, local emergency preparedness committee, or other emergency preparedness or response agencies.

6. EMERGENCY COMMUNICATIONS PLAN

RPS will communicate to the public, including elected officials, about any event that requires an emergency response to ensure that the public understands what happened and whether there are environmental or safety implications. The amount of information, timing, and communication method(s) will be appropriate to the event, its severity, and whether drinking water or other environmental resources were impacted; the response will also consider any impacts to the surrounding community and their awareness of the event.

RPS 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), RPS will provide periodic updates on the progress of the response action(s).

RPS 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, landowners, and Regional Response Teams (as part of the National Response Team).

7. PLAN REVIEW

This ERRP shall be reviewed as follows:

- At least once every 5 years following its approval by the permitting agency
- Within 1 year of an AoR reevaluation
- Within 30-days following any significant changes to the injection process, the injection facility, or an emergency event
- As required by the permitting agency

If the review indicates that no amendments to the ERRP are necessary, RPS will provide the permitting agency 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 agency within 120 days following an event that initiates the ERRP review procedure.

8. STAFF TRAINING AND EXERCISE PROCEDURES

RPS will provide continuing training programs for operating and maintenance personnel regarding potential hazards, risk scenarios, and response activities. This will include facility staff and contractors working at the RPS Storage Site or within the AoR . This may include, but is not limited to, the following:

- Incident Command System Training
- CO_2 Facilities Training
- CO_2 Safety Training
- CO_2 Hazards Training
- Emergency Response Training

At least once prior to the commencement of injection and on a reoccurring basis, RPS will conduct emergency preparedness field drills and/or tabletop exercises, including interaction with state and local emergency response entities and participation by the appropriate RPS personnel. The training program will document each employee's successful completion of training, drills, and exercises.

Figures

Figure is provided separately as an individual file