

Application No. 45079, 45080, 46169, 46170, and 46171

POST-INJECTION SITE CARE AND SITE CLOSURE PLAN

Pelican Sequestration Project

Application No. 45079, 45080, 46169, 46170, and 46171

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1.0 Facility Information

Facility name: Pelican Sequestration Project
Pelican CCS 1, Pelican CCS 2, Pelican CCS 3, Pelican CCS 4, and Pelican CCS 5 wells

Facility contact: Tyler Spoede, Project Manager
5 Greenway Plaza Houston, TX 77046
713-985-6954 william_spoede@oxy.com

Well location: Livingston Parish, Louisiana

Well Name	Longitude (NAD 27)	Latitude (NAD 27)	Longitude (NAD 83)	Latitude (NAD 83)
Pelican CCS 1	-90° 40' 55.76"	30° 35' 19.16"	-90° 40' 56.10"	30° 35' 19.83"
Pelican CCS 2	-90° 40' 58.83"	30° 34' 53.98"	-90° 40' 59.17"	30° 34' 54.66"
Pelican CCS 3	-90° 43' 50.13"	30° 36' 10.56"	-90° 43' 50.48"	30° 36' 11.24"
Pelican CCS 4	-90° 44' 29.72"	30° 36' 41.03"	-90° 44' 30.06"	30° 36' 41.70"
Pelican CCS 5	-90° 46' 30.21"	30° 37' 35.26"	-90° 46' 30.56"	30° 37' 35.93°

This Post-Injection Site Care and Site Closure (PISC) plan describes the activities that Pelican Sequestration Hub, LLC, will perform during the Post Injection Site Care and Site Closure of Pelican Sequestration Project (the Project) to meet the requirements of LAC 43:XVII.3633(A) Pelican Sequestration Hub, LLC, will monitor ground water quality, soil gas and track the position of the carbon dioxide plume and pressure front for 50 years. Pelican Sequestration Hub, LLC, may not cease post-injection monitoring until a demonstration of non-endangerment of USDWs has been approved by the Louisiana Department of Conservation and Energy (C&E) pursuant to LAC 43:XVII.3633(A)(2)(c). Following approval for site closure, Pelican Sequestration Hub, LLC, will plug all monitoring wells, restore the site to its original condition, and submit a site closure report and associated documentation.

2.0 Pre- and Post-Injection Pressure Differential [LAC 43:XVII.3633(A)(1)(b)(i)]

Table PIS-1 contains the pressure differentials between pre- and post-injection conditions at the injection wells: Pelican CCS 1, Pelican CCS 2, Pelican CCS 3, Pelican CCS 4, and Pelican CCS 5. Based on the modeling of the pressure front as part of the AoR delineation, the maximum pressure differential from initial pressure is 326 psi at the Pelican CCS 1 well.

Table PIS-2 shows the pressure differential versus time at the gauge depth for the monitoring well locations in the Area of Review (AoR). The highest pressures are in the immediate vicinity of each injector well. Once injection ceases, the pressure re-distributes, and magnitude and area of elevated pressure gradually decreases over time. The pressure is expected to be below the threshold pressure of 105 psi in all areas of the site by the end of the PISC timeframe.

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Table PIS-1—Pressure Differential to Pre-Injection Conditions at CO2 Injection Well Locations

Years	Max of Pelican CCS 1 Delta Pressure (psi)	Max of Pelican CCS 2 Delta Pressure (psi)	Max of Pelican CCS 3 Delta Pressure (psi)	Max of Pelican CCS 4 Delta Pressure (psi)	Max of Pelican CCS 5 Delta Pressure (psi)
Injection Y1	286	256	117	313	40
Injection Y2	294	263	132	313	50
Injection Y3	299	265	139	307	54
Injection Y4	304	268	144	301	57
Injection Y5	311	275	148	297	60
Injection Y6	316	281	151	295	62
Injection Y7	321	287	154	293	64
Injection Y8	326	293	156	292	65
Injection Y9	212	203	155	293	67
Injection Y10	211	191	155	291	68
Injection Y11	193	168	83	53	63
Injection Y12	187	156	78	50	62
Injection Y13	185	151	78	50	62
Injection Y14	185	149	78	50	63
Injection Y15	212	180	285	64	64
Injection Y16	223	192	288	70	68
Injection Y17	117	129	278	107	263
Injection Y18	110	115	272	108	257
Injection Y19	109	111	270	110	254
Injection Y20	108	112	270	111	252
Injection Y21	113	114	273	118	260
Injection Y22	116	117	276	121	261
Injection Y23	117	120	277	123	260
Injection Y24	117	122	278	125	259
Injection Y25	118	124	279	126	258
Post Injection Y5	32	31	29	21	25
Post Injection Y10	24	23	22	17	19
Post Injection Y20	19	20	19	14	15
Post Injection Y30	17	20	18	14	14
Post Injection Y40	16	20	17	15	15
Post Injection Y50	15	20	16	17	20

Figure PIS-1 shows the simulated pressure versus time for the Pelican CCS 1, Pelican CCS 2, Pelican CCS 3, Pelican CCS 4, Pelican CCS 5, and Pelican MLR 4 locations at the gauge depth. The step change in differential pressures at the injection wells is due to the change in the injection and completion strategy and not due to a sudden change in the formation pressure.

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Table PIS-2—Pressure Differential to Pre-Injection Conditions at the Gauge Depth in Monitoring Well Locations

Item	Well Information
Well Name	Pelican MLR 4
Gauge Depth (TVDSS)	4,620
Year	Pressure Differential (psi)
Injection Y1	236
Injection Y2	249
Injection Y3	252
Injection Y4	254
Injection Y5	258
Injection Y6	262
Injection Y7	266
Injection Y8	270
Injection Y9	196
Injection Y10	185
Injection Y11	163
Injection Y12	151
Injection Y13	146
Injection Y14	145
Injection Y15	175
Injection Y16	188
Injection Y17	124
Injection Y18	109
Injection Y19	105
Injection Y20	105
Injection Y21	107
Injection Y22	110
Injection Y23	112
Injection Y24	115
Injection Y25	117
Post Injection Y5	26
Post Injection Y10	18
Post Injection Y20	17
Post Injection Y30	17
Post Injection Y40	18
Post Injection Y50	19

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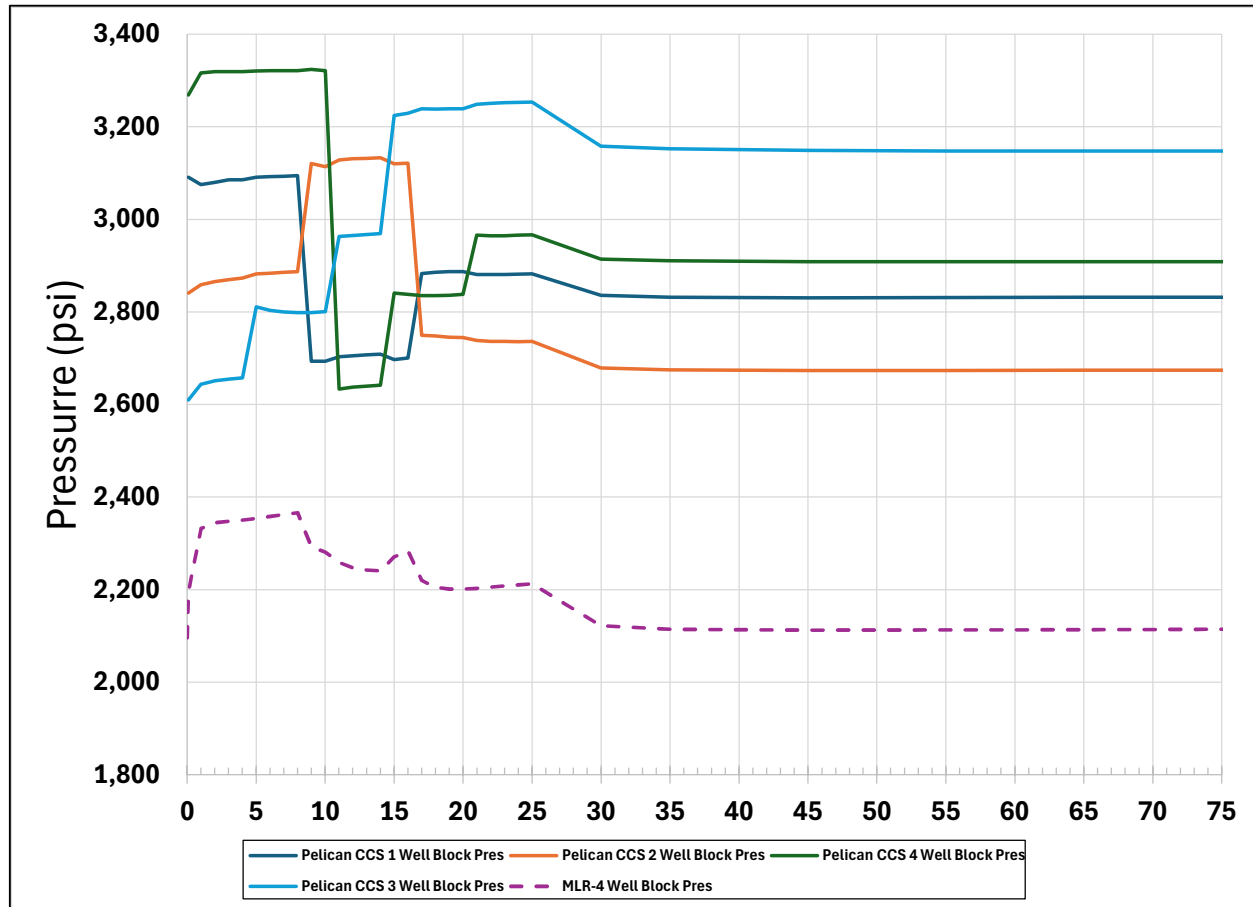


Figure PIS-1—Simulated pressure vs. time for Pelican CCS 1, Pelican CCS 2, Pelican CCS 3, Pelican CCS 4, Pelican CCS 5 and Pelican MLR 4 well locations at the gauge depth

Figure PIS-2 and Figure PIS-3 show the simulated maximum pressure differential in the reservoir (from initial reservoir pressure) at 25 years after the start of injection and 50 years of post-injection period, respectively. The pressure has dissipated below the threshold pressure in all areas of the site by year 50 of the post injection period.

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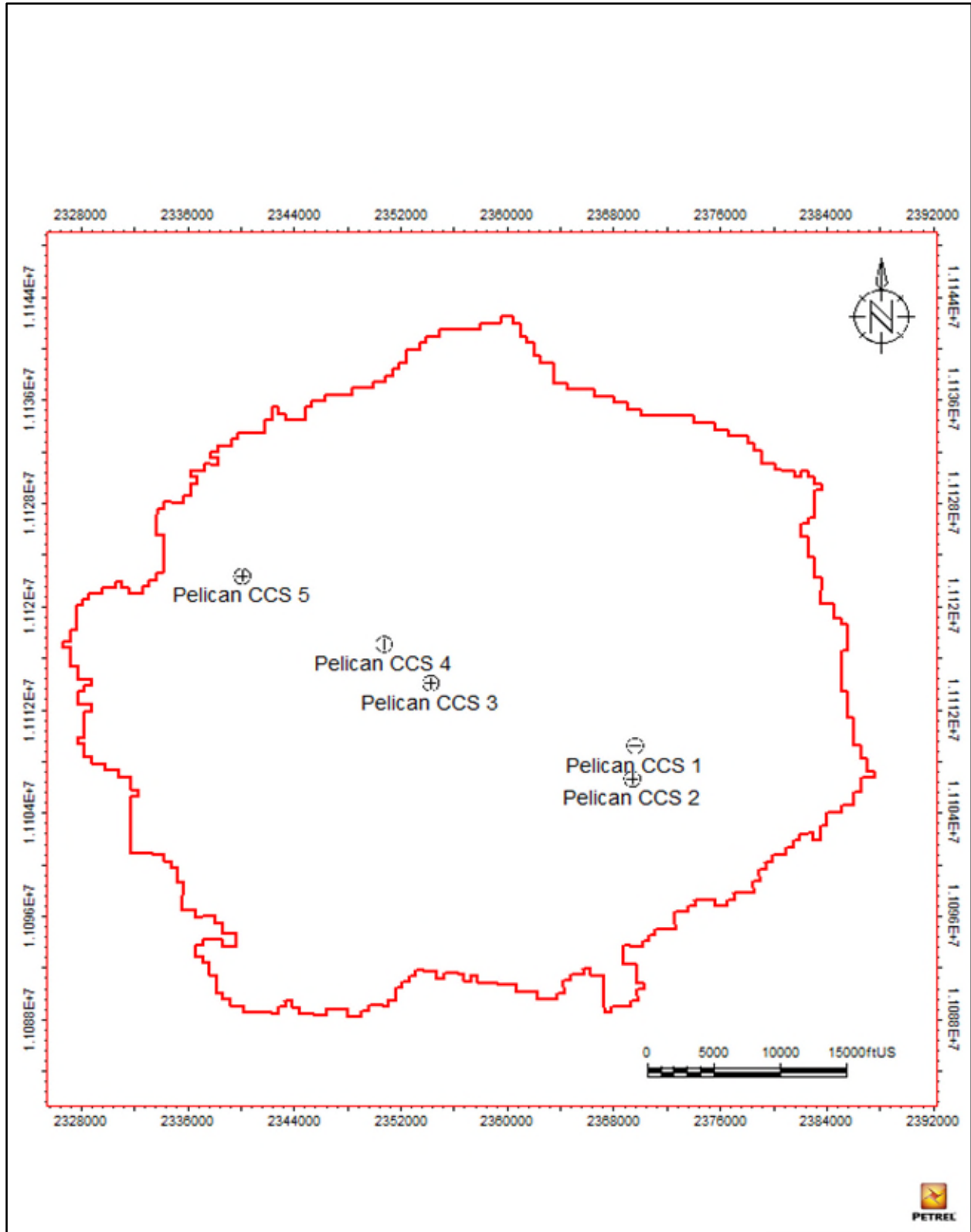


Figure PIS-2—Maximum aqueous pressure differential from the baseline condition at 25 years (end of injection). The threshold pressure of 105 psi is indicated by the red line.

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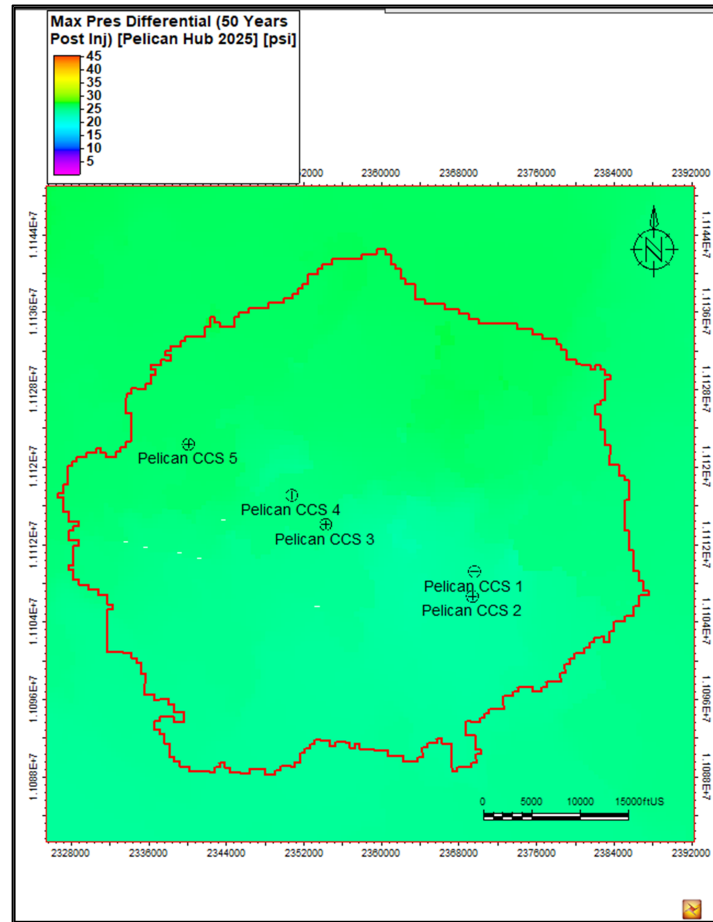


Figure PIS-3—Maximum aqueous pressure differentials from the baseline condition at 50 years post injection. The red outline is the maximum extent of the threshold pressure.

3.0 Predicted Position of the CO₂ Plume and Associated Pressure Front at Site Closure [LAC 43:XVII.3633(A)(1)(b)(ii)].

The reservoir simulation indicates that after injection ceases, the CO₂ plume remains within the Frio_Lower but continues to expand northward in the up-dip direction of the reservoir with time. To be conservative, the AOR is defined by the plume shape and size in year 125 (100 years after injection ceases). The colored area in Figure PIS-4 shows the CO₂ plume extent in year 75 (i.e., 50 years post-injection) as defined by the vertically integrated mass per unit area (VIMPA) containing 99% of the total mass injected. The simulated plume at 100 years post-injection is represented by the magenta outline. In addition, a N–S cross-section through well Pelican CCS 1 at both times is shown in Figure PIS-5. The differences between the areal and vertical extents of the 75- and 125-year plumes is small and accounts for <4% of the total mass of gas injection. In addition, as previously shown in Figure PIS-2 and Figure PIS-3, all pressures have been reduced to levels below the level of endangerment to USDWs. Therefore, year 75 (50 years post-injection) is considered as the site closure date.

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The maps are based on the final AOR delineation modeling results submitted pursuant to LAC 43:XVII.3615(B) and (C).

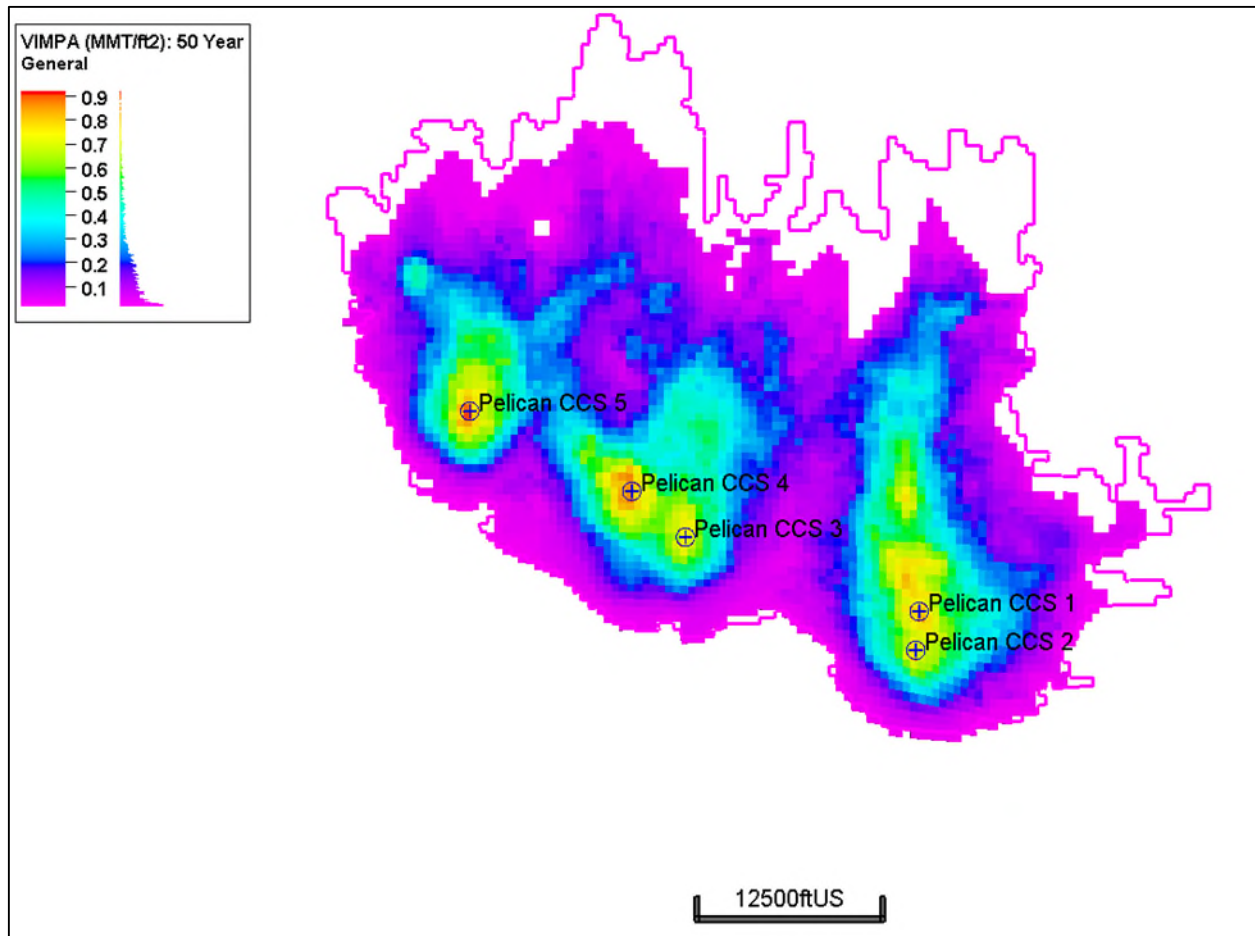


Figure PIS-4—Areal extent of the CO₂ plume at site closure in year 75 (50 years post-injection) defined by the vertical integration of mass per unit area accounting for 99% mass of CO₂ injected. The magenta outline represents the simulated CO₂ plume 100 years post-injection.

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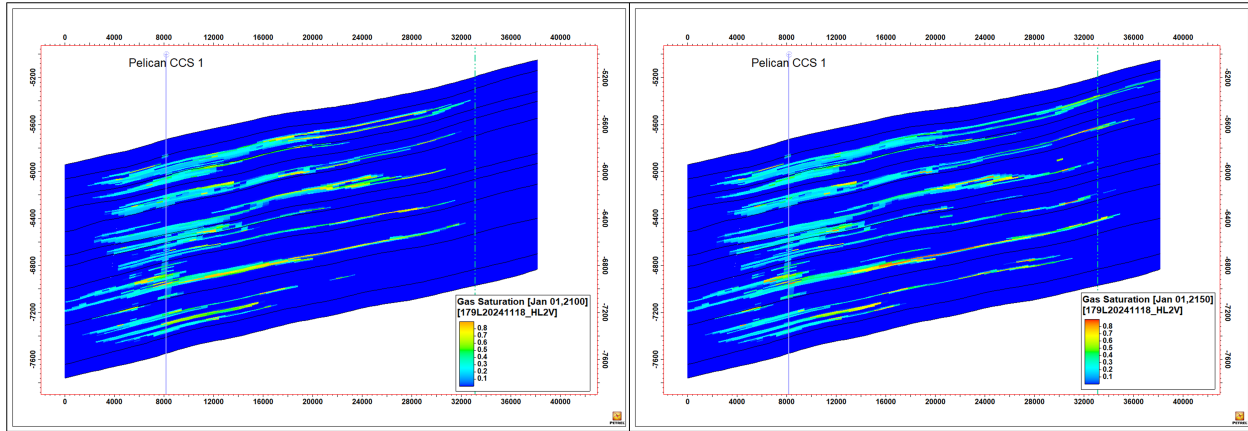


Figure PIS-5—North–South cross-section through well Pelican CCS 1 showing simulated gas saturation in year 75 (50 years post-injection) and in year 125 (100 years post-injection).

Figure PIS-6 shows the CO₂ plume size as a function of time, with year 0 being the initiation of injection. The simulation model predicts that the CO₂ plume (defined as the area containing 99% of the total mass of injected CO₂) increases rapidly during injection and continues to increase after the cessation of injection in year 25. This continued migration of the plume is due to buoyancy of the mobile supercritical phase CO₂, which moves along the strata in the up-dip direction. The increase in plume size diminishes at year 75, which is the proposed site closure time. Over a 50-year period, from year 75 to year 125, the plume increases in size by about 24% compared to an approximate 98% increase from end of injection to year 75.

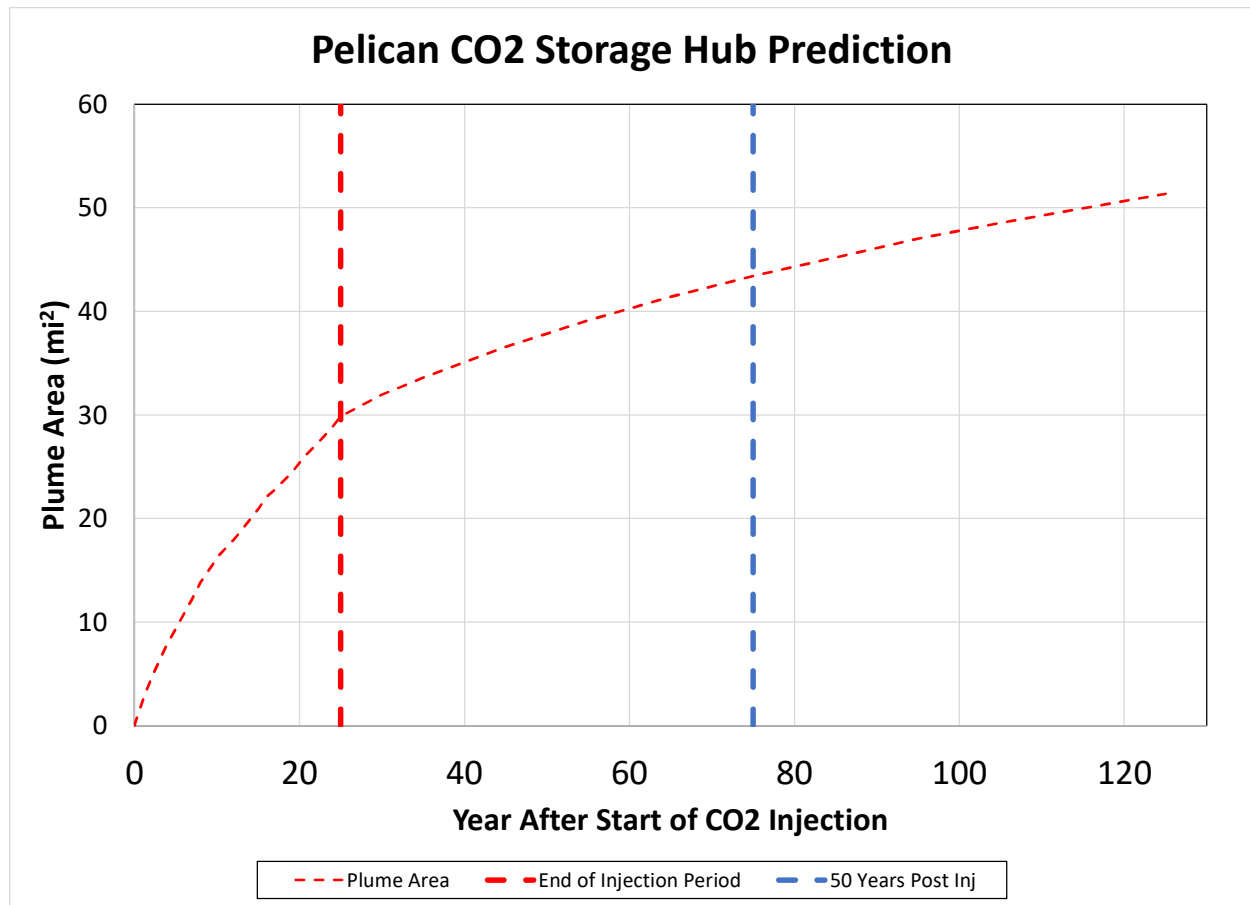


Figure PIS-6—Simulated CO₂ plume area containing 99% of the total mass of CO₂ over time. The blue dashed line denotes the time of site closure.

4.0 Post-Injection Monitoring Plan [LAC 43:XVII.3633(A)(2)(a)]

Performing groundwater quality monitoring, soil gas and plume and pressure front tracking as described in the following sections during the post-injection phase will meet the requirements of LAC 43:XVII.3633(A)(2). The results of all post-injection phase testing and monitoring will be submitted annually.

A quality assurance and surveillance plan (QASP) for all testing and monitoring activities during the injection and post injection phases is provided as a separate document.

After the injection ceases, the project will plug and abandon the injector wells according to the plugging procedure proposed in the Injection Well Plugging Plan.

After injection ceases, the Project will keep operative Pelican MLR 4, Pelican ACZ 1, and the two USDW monitoring wells during the post-injection period.

After injection ceases the Project will repeat a 2D surface seismic or gravity survey to map the extension of the CO₂ plume. This survey will be repeated at year 5 and 10 post injection and before the site closure as a proof of non-endangerment to USDW.

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During the post-injection period, the model predicts that within 2 years after injection ceases, the pressure front will reduce below the threshold pressure across the AoR and will not represent a risk of endangerment to the USDW, Figure PIS-7. The CO₂ plume will continue to slightly migrate but at a stable rate.

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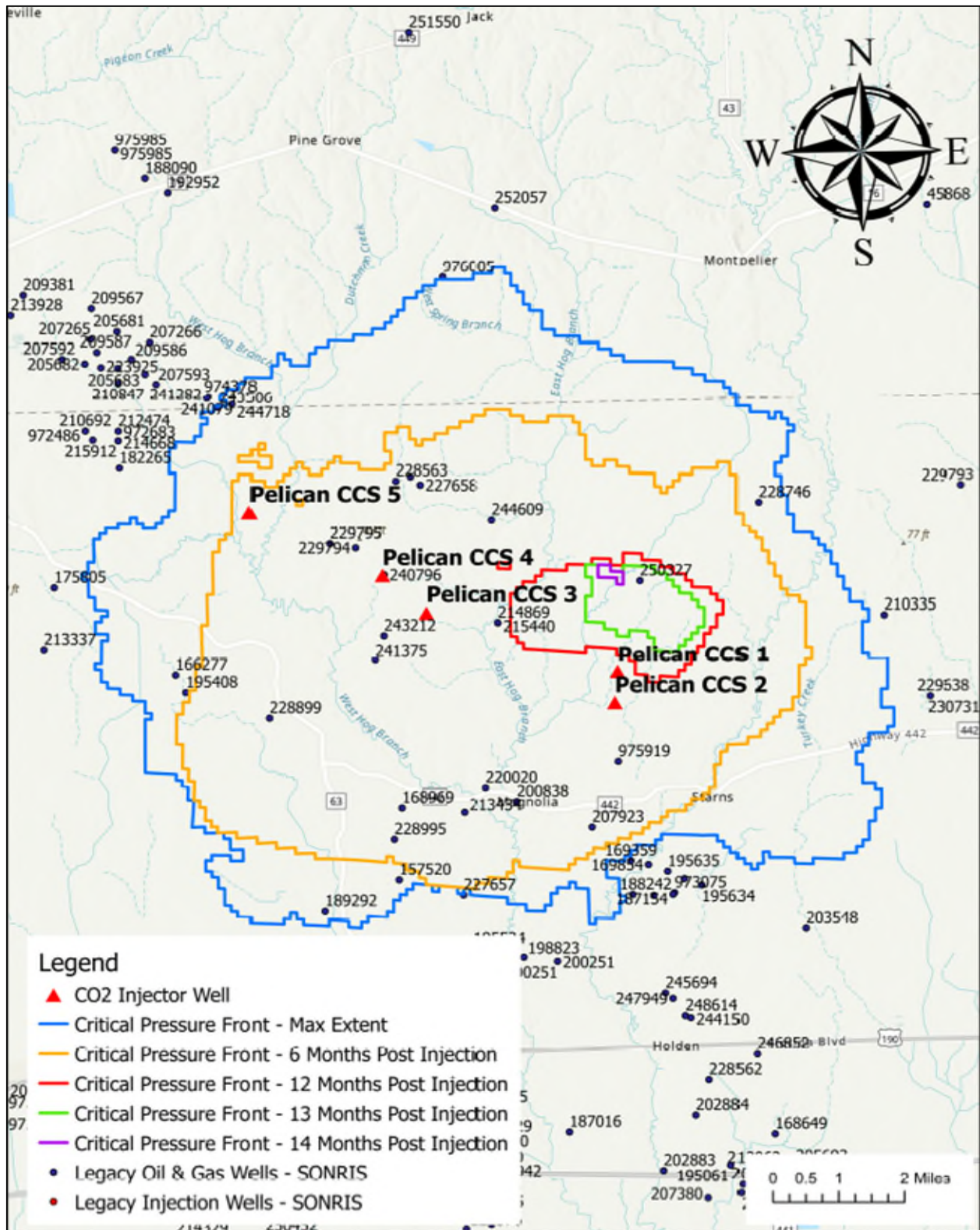


Figure PIS-7—Simulated areal extent of the threshold pressure front after 25 years of injection.

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For the first 10 years of the post-injection period, the monitoring program will focus on demonstrating stabilization of the pressure and CO₂ plume migration and demonstration of non-endangerment to USDW.

After 10 years of the post-injection period, the Project will plug Pelican MLR 4 and Pelican ACZ 1 and will continue monitoring USDW groundwater with Pelican USDW 1 and Pelican USDW 2, in combination with visual inspections and soil gas monitoring, until the closure of the site.

Table PIS-3 describes the methods and techniques to be used while monitoring the site during the post-injection period. Locations and frequency for each method or technique are also presented in Table PIS-3.

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Table PIS-3—Monitoring Plan for Post-Injection Site Care

Description	Method	Location	Post-Injection period
Operations	Surface pressure and temperature measurements in tubing - gauges	Pelican MLR 4 Pelican ACZ 1	Monthly until the wells are plugged.
	Visual inspections and handheld monitors (LEL, H ₂ S, CO ₂)	General facilities	Quarterly until facilities are closed.
Mechanical Integrity	Pulse neutron, Temperature log, or Electromagnetic log	Pelican MLR 4	As required for plume monitoring, no minimum than every 5 years.
	Annular pressure test	Pelican MLR 4	Every 5 years until the wells are plugged.
Groundwater quality and geochemical monitoring	Water sampling and testing of USDW well.	Pelican USDW 1 Pelican USDW 2 Pelican ACZ 1	Annually first 10 years of post-injection period, every two years from year 10 to site closure or until wells are plugged
CO ₂ plume and pressure front tracking	Pulse Neutron Log	Pelican MLR 4	Every two years until the wells are plugged.
	In-reservoir pressure and temperature measurement - downhole gauges	Pelican MLR 4	Monthly until the wells are plugged.
	2D time lapsed surface seismic or gravity survey	AoR	At 5 years post injection, at 10 years post injection, and at site closure.
Near-Surface Monitoring	Process-based soil gas approach	AoR	Annually until site closure.

Specifics of the methods, techniques, and analytics to be tested as part of the proposed monitoring plan are described in detail in the Testing and Monitoring Plan (TM) and the QASP document.

5.0 Schedule for Submitting Post-Injection Monitoring Results [LAC 43:XVII.3633(A)(1)(b)(iv)]

During the PISC period, the monitoring reports will be prepared annually and submitted to the Louisiana Department of Conservation and Energy (C&E). These reports will summarize methods and results of the monitoring techniques including ground water quality monitoring, soil gas analysis, CO₂ storage zone pressure tracking, and indirect geophysical monitoring for CO₂ plume tracking.

The PISC and Site Closure Plan will be reviewed every 5 years during the PISC period. Results of the plan review will be included in the PISC monitoring reports. The operational and monitoring results will be reviewed for adequacy in relation to the objectives of the PISC. The monitoring locations, methods, and schedule will be analyzed in relation to the size of the CO₂ storage zone, pressure front, and protection of USDWs. In case of changes to the PISC plan, a modified plan will be submitted to C&E and required to be approved by the commissioner 30 days prior to the change implementation.

6.0 Non-Endangerment Demonstration Criteria

Prior to approval of the end of the post-injection phase, Pelican Sequestration Hub LLC, will submit a demonstration of non-endangerment of USDWs to C&E, per LAC 43:XVII.3633(A)(2)(b) and (c).

Pelican Sequestration Hub LLC, will issue a report to C&E. This report will make a demonstration of USDW non-endangerment based on the evaluation of the site monitoring data used in conjunction with the project's computational model. The report will detail how the non-endangerment demonstration evaluation uses site-specific conditions to confirm and demonstrate non-endangerment. The report will include all relevant monitoring data and interpretations upon which the non-endangerment demonstration is based, model documentation and all supporting data, and any other information necessary for C&E to review the analysis. The report will include the following sections:

6.1 Introduction and Overview

A summary of relevant background information will be provided, including the operational history of the injection project, the date of the non-endangerment demonstration relative to the post-injection period outlined in this PISC and Site Closure Plan, and a general overview of how monitoring and modeling results will be used together to support a demonstration of USDW non-endangerment.

6.2 Summary of Existing Monitoring Data

A summary of all previous monitoring data collected at the site, pursuant to the Testing and Monitoring Plan document and this PISC and Site Closure Plan, including data collected during the injection and post-injection phases of the project, will be submitted to help demonstrate non-endangerment. Data submittals will be in a format acceptable to C&E and will include a narrative explanation of monitoring activities, including the dates of all monitoring events, changes to the

monitoring program over time, and an explanation of all monitoring infrastructure that has existed at the site. Data will be compared with baseline data collected during site characterization (LAC 43:XVII.3607(C)(2)(e) and LAC 43:XVII.3617(B)(4)(c)).

6.3 Summary of Computational Modeling History

The computational modeling results used for the AoR delineation will be compared to monitoring data collected during the operational and PISC periods (LAC 43:XVII.3607(C)(2)(e) and LAC 43:XVII.3617(B)(4)(c)). The data will be used to update the computational model and monitor the site, and will include both direct (e.g., measurements of pressure, temperature, groundwater quality, and injection zone fluid composition) and indirect (e.g., passive seismic or gravity and integrated deformation monitoring, PNC logging) geophysical methods.

Data generated during the PISC period will be used to show that the computational model accurately represents the storage site and can be used as a proxy to determine the plume's properties and size. Pelican Sequestration Hub, LLC, will demonstrate this degree of accuracy by comparing the monitoring data obtained during the PISC period with the model's predicted properties (i.e., plume location, rate of movement, and pressure decay). Statistical methods will be employed to correlate the data and confirm the model's ability to represent the storage site accurately. The validation of the computational model with the large quantity of measured data will be a significant element to support the non-endangerment demonstration. Further, the validation of the complete model over the entire area, and at the points where direct data collection has taken place, will ensure confidence in the model for those areas with no direct observation wells where the surface infrastructure precludes geophysical data collection.

6.4 Evaluation of Reservoir Pressure

Pelican Sequestration Hub, LLC, will demonstrate non-endangerment to USDWs by showing that during the PISC period, the pressure within the Frio and Anahuac reservoirs will rapidly decrease to levels near its pre-injection static reservoir pressure. Because increased pressure is the primary driving force for fluid movement, the decay in the pressure differential provides strong justification that the injectant will no longer pose a risk to any USDWs.

Pelican Sequestration Hub, LLC, will monitor the downhole reservoir pressure using a combination of surface and downhole pressure gauges. The measured pressure will be compared with the pressure predicted by the computational model, which was previously shown in Figure PIS-1, Figure PIS-2 and Figure PIS-3. Agreement between the actual and predicted values will validate the accuracy of the model and further demonstrate non-endangerment.

6.5 Evaluation of Carbon Dioxide Plume

Pelican Sequestration Hub, LLC, will use a combination of monitoring data, logs, geophysical surveys, and seismic or gravity methods to locate and track the movement of the CO₂ plume. The data produced by these activities will be compared with the modeled predictions using statistical methods to validate the model's ability to represent the storage site accurately. Regarding the separate-phase carbon dioxide plume, the PISC monitoring data will show the stabilization of the CO₂ plume as the reservoir pressure returns to its near pre-injection state.

Project monitoring wells located above the confining layer may be used to determine aqueous-phase CO₂ concentrations and mobilized constituents to assess USDW endangerment. If a demonstration can be made, in conjunction with monitoring data, that a vast majority of the CO₂ has been immobilized via trapping mechanisms, then there is strong evidence that the risk to USDWs posed by the CO₂ plume has decreased. Modeling results, including sensitivity analyses, may also be used to demonstrate that plume migration rates are negligible based on available site characterization, monitoring, and operational data.

6.6 Evaluation of Emergencies or Other Events

In addition to the CO₂ plume, mobilized fluids may also pose an ongoing risk to USDWs, as the reservoir fluids include brines high in TDS and other drinking water contaminants. The geochemical data collected from monitoring wells will be used to demonstrate that no mobilized fluids have moved above the confining formation, and therefore, would not pose a risk to USDWs after the PISC period.

To demonstrate non-endangerment, the Pelican Sequestration Hub, LLC, will compare the operational and PISC period samples of the lowermost USDW/above confining zone with the pre-injection characterization of the aquifers. This evaluation will demonstrate that no mobilized formation fluids have moved through the confining formation. In addition, this validation of confining zone integrity will demonstrate that the injectant and/or mobilized fluids will not represent an endangerment to any USDWs.

Other than the project and monitoring wells, other potential conduits for fluid movement or leakage pathways within the AOR will be adequately plugged and abandoned. Based on this information, the potential for fluid movement through artificial penetrations of the confining formation does not present a risk of endangerment to any USDWs.

7.0 Site Closure Plan

Pelican Sequestration Hub, LLC, will conduct site closure activities to meet the requirements of (LAC 43:XVII.3607(C)(2)(e) and LAC 43:XVII.3617(B)(4)(c)). as described below. Pelican Sequestration Hub, LLC, will submit a final Site Closure Plan and notify the permitting agency at least 120 days prior of its intent to close the site. Once the permitting agency has approved closure of the site, Pelican Sequestration Hub, LLC, will plug the monitoring wells remaining in the AOR and submit a site closure report to C&E. The activities, as described below, represent the planned activities based on information provided to C&E. The actual site closure plan may employ different methods and procedures. A final Site Closure Plan will be submitted to C&E for approval with the notification of the intent to close the site.

The Louisiana Department of Wildlife and Fisheries, and Livingston Parish agencies will be notified prior to the scheduled site closure. Currently, there are no federally recognized Native American Tribes located within the AOR; however, if a federally recognized Native American Tribe becomes known within the AOR at the time of site closure, that tribe(s) will be notified of the site closure.

7.1 Plugging Monitoring Wells

Upon conclusion of the 50-year post-injection site care period, any remaining monitoring well will be plugged and capped below grade in accordance with the approved plugging and abandonment plans (Injection Well Plugging Plan, PLG).

After the completion of the plugging activities, a plugging report will be submitted to C&E describing the methods used and tests performed on the well during plugging. This report will be submitted to C&E within 60 days of completing the plugging activities.

7.2 Planned Remedial and Site Restoration Activities

At the end of the PISC phase, Pelican Sequestration Hub, LLC, will ensure the site is reclaimed and returned to predevelopment condition to meet the requirements of LAC 43:XVII.3633(A)(5).

Surface equipment decommissioning will occur in two phases: the first phase will occur after the active injection phase, and the second phase will occur at the end of the PISC phase.

At the end of the active injection period, plume monitoring will continue, but there will be no further need for flow control and monitoring equipment. The process control building at the surface facility will remain. This building serves as a hub for control and monitoring of the well network, so it will remain operational until all monitoring wells are abandoned. The pumping system and aboveground pipe, valves, and fittings at the surface pumping facility will be removed.

The injection wells will be plugged and capped below grade as per the Injection Well Plugging Plan document of this permit. The process control building at the facility site will act as the collection node for data from the plume monitoring equipment. This building will contain the equipment required to receive real-time data from the monitoring wells and other monitoring stations and send the data via an internet connection to be analyzed offsite during the 50-year post-injection monitoring period.

All surface facilities will be removed at the end of the PISC phase. That includes the process control building at the surface pumping facility site. The site will be reclaimed and returned to predevelopment condition. Buried pipelines are expected to be idled and abandoned in place.

The soil will be backfilled around the monitoring and geophysical wells to bring the area around the wells back to the pre-installation grade. Any remaining surface facilities associated with the monitoring wells will be reclaimed, and the area will be returned to predevelopment condition. All gravel pads and surface facilities will be removed, and the land will be reclaimed for preconstruction uses.

7.3 Site Closure Report

A site closure report will be prepared and submitted within 90 days following site closure, documenting the following:

- Plugging of all injection and monitoring wells,
- Details of site restoration activities,
- Location of the sealed injection well on a plat survey submitted to the local zoning authority,
- Notifications to state and local authorities,
- Records regarding the nature, composition, and volume of CO₂ injected,
- Pre-injection, injection, and post-injection monitoring records, and
- Certifications that all injection and storage activities have been completed.

Pelican Sequestration Hub, LLC, will record a notation to the property's deed on which the injection well was located that will indicate the following:

- That the property was used for carbon dioxide sequestration,
- The name of the local agency to which a plat of survey with injection well location was submitted,
- The volume of fluid injected,
- The formation into which the fluid was injected, and
- The period over which the injection occurred.

The site closure report will be submitted to the permitting agency and maintained by the owner or operator for a period of 10 years following site closure. Additionally, the owner or operator will maintain the records collected during the post-injection period for a period of 10 years after which these records will be delivered to C&E.