

August 28, 2024

Maura Bradshaw
Bureau of Land Management
Rock Springs Field Office
Submitted via eplanning.blm.gov and electronic mail

Re: Comment on Draft Environmental Assessment, SW Wyoming Carbon Dioxide Sequestration project, DOI-BLM-WY-D090-2023-0010-EA

Dear Ms. Bradshaw:

On behalf of our millions of members and online activists, the Natural Resources Defense Council (NRDC) respectfully submits the following letter that supplements our initial comments—submitted July 30, 2024—on the Draft Environmental Assessment (Draft EA) for Moxa Carbon Storage, LLC’s proposed SW Wyoming Carbon Dioxide Sequestration project (Moxa CO₂ Project) in Lincoln, Sweetwater, and Uinta counties in Southwestern Wyoming, DOI-BLM-WY-D090-2023-0010-EA.

In our July 30 comment letter, we raised concerns related to existing surface and subsurface activities taking place within the proposed project area, noting that:

Of particular concern is the BLM’s disclosure that there are “existing land use activities” that include “oil and gas production [and] mining.”¹ Despite mentioning these current activities within the project area, the Draft EA is silent as to the location, timeframe, and extensiveness of these activities. [T]he existence of operating oil and gas wells and mines as well as the possible existence of abandoned and/or orphaned oil and gas wells or mines could pose significant risks to the geologic integrity of the planned injection formation. More information and analysis of this risk is required.²

With the time afforded by the comment period extension, we were able to conduct a further inquiry into these concerns and wish to raise them once again here.

In particular, we are especially concerned with the lack of detail and consideration of the potential environmental effects of permitting the Moxa CO₂ Project beneath an area with such significant oil and gas extraction activity. According to records maintained by the Wyoming State Geological Survey, there are 1,442 oil and gas wells located within the proposed boundary of the Moxa CO₂ Project.³ Characterization of these wells, their operating status, depth, and potential for interaction with the target storage formation is crucial information to present and analyze in any right-of-way permitting exercise for permanent pore space storage of injected CO₂. Further, such information appears to be required by the BLM’s governing guidance, which states that:

¹ Draft EA at 15.

² See “NRDC Comment – SW WY CO₂ Sequestration Project,” at 8 (July 30, 2024), submitted electronically at <https://eplanning.blm.gov/eplanning-ui/project/2023000/510>.

³ Wyoming State Geological Survey, “Interactive Oil and Gas Map of Wyoming,” 2016 (revised 2023), available at <https://portal.wsgs.wyo.gov/arcgis/apps/webappviewer/index.html?id=d42f571b87fa4234b03d66ca7ae311a4>.

The BLM should complete appropriate exploration and site characterization studies . . . and review any applicant-prepared characterization studies to determine surface and pore space ownership, geologic boundary limits, and formation impermeability before authorizing CO₂ sequestration. *This initial work ensures that no physical connections exist between different formations identified for CO₂ sequestration.*⁴

Given the importance of this analysis and the complexity of carrying it out, we reiterate our July 30 ask that the agency pause consideration of permitting for this project, request that the proponent provide its own analysis of the risks created by existing activities and infrastructure, and present the BLM's views on that analysis in a robust environmental impact statement (EIS). That EIS should, at the same time, address the numerous other environmental concerns raised in comments received about this proposed project.

In addition to the risks of CO₂ injection so close to so many existing oil and gas operations, we also wish to point to additional information about existing mining operations taking place within the proposed project area. According to records maintained by the Wyoming Department of Environmental Quality, there are at least ten active mining operations within the proposed project area.⁵ Given resources being mined—sand and gravel and Trona—it is not immediately clear whether this activity could affect the geologic integrity of the proposed project. Nonetheless, consideration of this risk should have been part of the Draft EA and should be part of a more robust analysis contained in a complete EIS.

Thank you for taking these additional points into consideration. If you have any questions regarding our comments or would like any additional information, please contact Joshua Axelrod by email at jaxelrod@nrdc.org.

Sincerely,

Josh Axelrod
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cc:

Kelly Lamborn
Wendy Huber

⁴ BLM, Instruction Memorandum 2022-41, National Policy for the Right-of-Way Authorizations necessary for Site Characterization, Capture, Transportation, Injection, and Permanent Geologic Sequestration of Carbon Dioxide in Connection with Carbon Sequestration Projects (June 8, 2022), available at <https://www.blm.gov/policy/im-2022-041> (emphasis added).

⁵ Wyoming Department of Environmental Quality, “Land Quality Division Web Viewer,” available at https://gis.deq.wyo.gov/Html5Viewer/index.html?viewer=LQD_View.LQD_View (last accessed August 27, 2024).