ENCLOSURE
Request for Additional Information

General Application Information

- A listing of the activities conducted by the applicant which require RCRA, UIC, NPDES, or PSD permits. [40 CFR §144.31(e)(1)]
- A listing of all permits or construction approvals received or applied for under the following programs: [40 CFR §144.31(e)(6)]
  (i) Hazardous Waste Management program under RCRA.
  (ii) UIC program under SDWA.
  (iii) NPDES program under CWA.
  (iv) PSD program under CAA.
  (v) Nonattainment program under CAA.
  (vi) NESHAPS preconstruction approval under CAA.
  (vii) Ocean dumping permits under MPRSA.
  (viii) Dredge and fill permits under 404 of CWA.
  (ix) Other relevant environmental permits, including State permits.
- A list of contacts for the Tribes within the area of review. [40 CFR §146.82(a)(20)]

Site Characterization Information

- Data on the capillary pressure of the injection zone(s). [40 CFR §146.82(a)(3)(iii)]

Proposed Well Operational Information

- Proposed average and maximum daily volume of the CO_2 stream for each injector. [40 CFR §146.82(a)(7)(i)]
- Proposed average injection pressures (both surface and bottomhole) for each injector; and proposed maximum surface injection pressure for each injector. [40 CFR §146.82(a)(7)(ii)]

Corrective Action Information

- A description of how corrective action will be conducted for the wells shown in Figure 3.18 of the application's Attachment B. [40 CFR §146.84(b)(2)(iv)]

Injection Well Construction Information

- External pressure, internal pressure, and axial loading associated with the casing and cementing of each injection well. [40 CFR §146.86(b)(1)(ii)]
- Corrosiveness of the formation fluids. [40 CFR §146.86(b)(1)(v)]
- Grade of cement and cement additives. [40 CFR §146.86(b)(1)(viii)]
- Quantity, chemical composition, and temperature of the CO_2 stream. [40 CFR §146.86(b)(1)(ix)]
- Characteristics of the formation fluids. [40 CFR §146.86(c)(3)(ii)]
- Tubing tensile, and collapse strengths. [40 CFR §146.86(c)(3)(vii)]
- Depiction of the alarms and automatic surface shut-off systems required by 40 CFR §146.88(e) on well schematics.

Financial Assurance Information

CTV's cost estimates for corrective action, injection well plugging, post injection site care and site closure, and emergency and remedial response were generated using the EPA FR Cost Estimation Tool; however, the cost estimates should represent costs for independent third-party providers to perform each activity.

- Cost estimates for corrective action, injection well plugging, post injection site care and site closure, and emergency and remedial response by independent third-party providers. [40 CFR §146.85(a)(2)]
- Proposed financial instrument(s) for corrective action. [40 CFR §146.85(a)(1)]

Consideration of Well Stimulation Program

40 CFR §146.88(a) requires that all stimulation programs be approved by the EPA Director as part of the permit application and incorporated into the permit. If the initial permit does not include a stimulation program and the operator identifies a need for well stimulation later on in the life of the project, a major permit modification would be necessary. EPA suggests that CTV consider preparing and including a proposed well stimulation program in the permit application. A generic stimulation program may be used for the pre-construction phase of the project.

Consideration of Endangered Species Act

EPA suggests that CTV consider having your qualified third-party environmental consultant to conduct biological pre-activity surveys, biological assessment/evaluation, and biological and mitigation compliance monitoring during the pre-construction phase of the project.

Consideration of National Historic Preservation Act

EPA suggests that CTV consider having your qualified archaeologist to conduct an archival records search, as well as pedestrian surveys, and to initiate Native American tribal consultation during the pre-construction phase of the project.