

**ATTACHMENT B: AREA OF REVIEW AND CORRECTIVE ACTION PLAN
40 CFR 146.84(b)**

Facility Information

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Location: [REDACTED]
[REDACTED]

3.0 AoR and Corrective Action Plan

3.1 Computational Modeling Approach

The computational modeling workflow begins with the development of a three-dimensional representation of subsurface geology. It leverages well data (bottom and surface hole location, wellbore trajectory, well logs, etc.) and 3-D seismic data for rendering structural surfaces into a geo-cellular grid. Attributes of the grid include porosity and permeability distributions of reservoir lithologies. This geologic model is often referred to as a static model, as it reflects the reservoir at a single moment. CTV licenses Schlumberger Petrel, industry-standard geo-cellular modeling software, for building and maintaining static models. The static model becomes dynamic in the computational modeler with the addition of:

- Fluid properties such as density and viscosity for CO₂ and water phases
- Liquid and gas relative permeability
- Capillary pressure data
- Proposed injection well completions and injection rates over the life of the project

Results from the computational model are used to establish the area of review (AoR), the ‘region surrounding the geologic sequestration project where underground sources of drinking water (USDWs) may be endangered by the injection activity’ (EPA 75 FR 77230). In the case of the CTV III storage project, the AoR encompasses the maximum aerial extent of the critical pressure front that was calculated as being necessary to move brine from the injection zone to the USDW via an open conduit.

3.1.1 Model Background

Computational modeling was completed using Computer Modeling Group's (CMG) Equation of State Compositional Simulator (GEM). GEM is capable of modeling enhanced oil recovery, chemical EOR, geomechanics, unconventional reservoir, geochemical EOR and carbon capture and storage. GEM can model flow of three components (gas, oil and aqueous) and multi-phase fluids as well as predict phase equilibrium compositions, densities, and viscosities of each phase. This simulator incorporates all the physics associated with handling of relative permeability as a function of interfacial tension (IFT), velocity, composition, and hysteresis. Computational modeling for the CO₂ plume utilized the Peng-Robinson Equation of State and the solubility of CO₂ in water is modeled by Henry's Law. The Peng-Robinson Equation of State establishes the properties of CO₂ over the Pressures and temperatures of the model. Solubility of CO₂ in aqueous phase was modeled by Henry's Law as a function of pressure, temperature, and salinity.

The plume model defines the potential quantity of CO₂ stored and simulates lateral and vertical movement of the CO₂ to define the extent of the CO₂ plume and the pressure changes in the reservoir during and after injection which are used to define the AoR.

The simulator predicts the evolution of the CO₂ plume by:

1. Incorporating complex reservoir geometry and wells and utilizing a full field static geological three-dimensional characterization of the reservoir incorporating lithology, saturation, porosity, and permeability.
2. Forecasting the CO₂ plume movement and growth by inputting the operating parameters into simulation (injection pressure and rates).
3. Assessing the movement of CO₂ after injection ceases and allowing the plume to reach equilibrium, including pressure equilibrium and compositions in each phase.

CMG's GEM software has been used in numerous CO₂ sequestration peer reviewed papers, including:

1. Simulation of CO₂ EOR and Sequestration Processes with a Geochemical EOS Compositional Simulator. L. Nghiem et al
2. Model Predictions Via History Matching of CO₂ Plume Migration at the Sleipner Project, Norwegian North Sea. Zhang, Guanru et al
3. Geomechanical Risk Mitigation for CO₂ Sequestration in Saline Aquifers. Tran, Davis et al.

3.1.2 Site Geology and Hydrology

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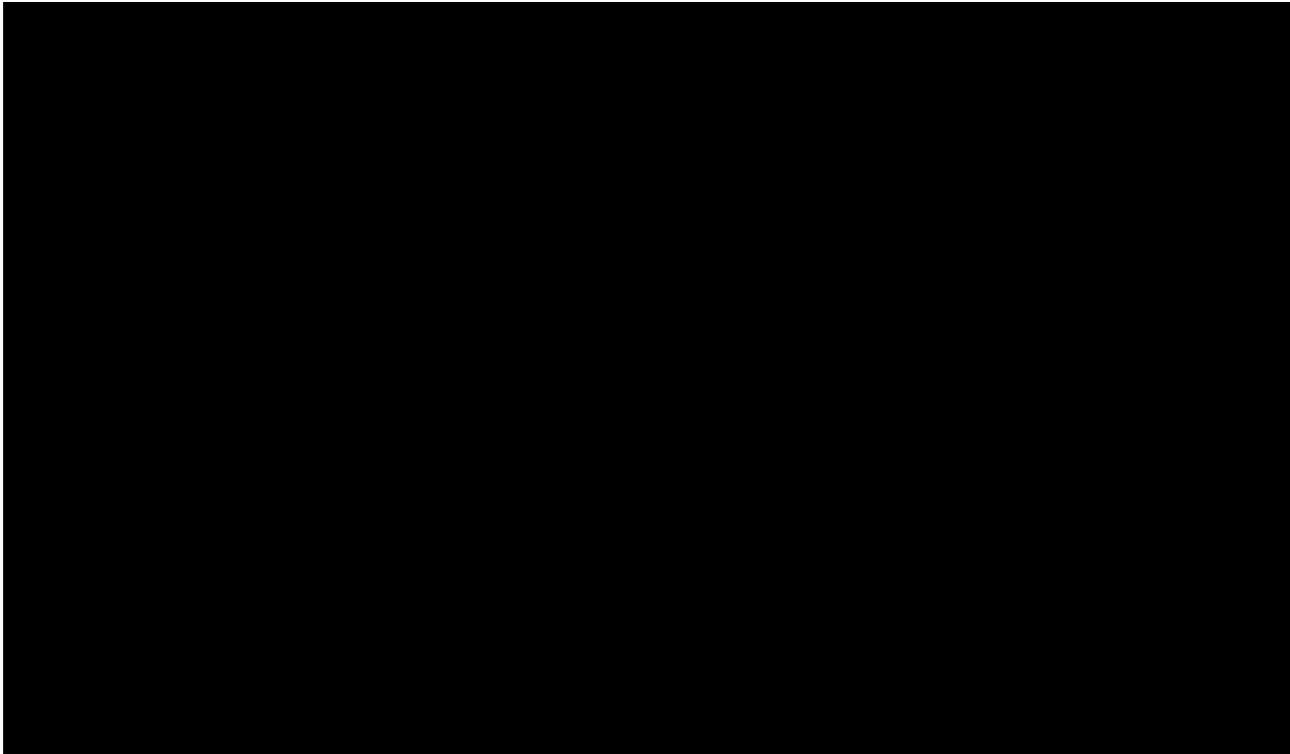


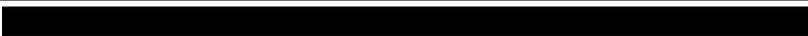
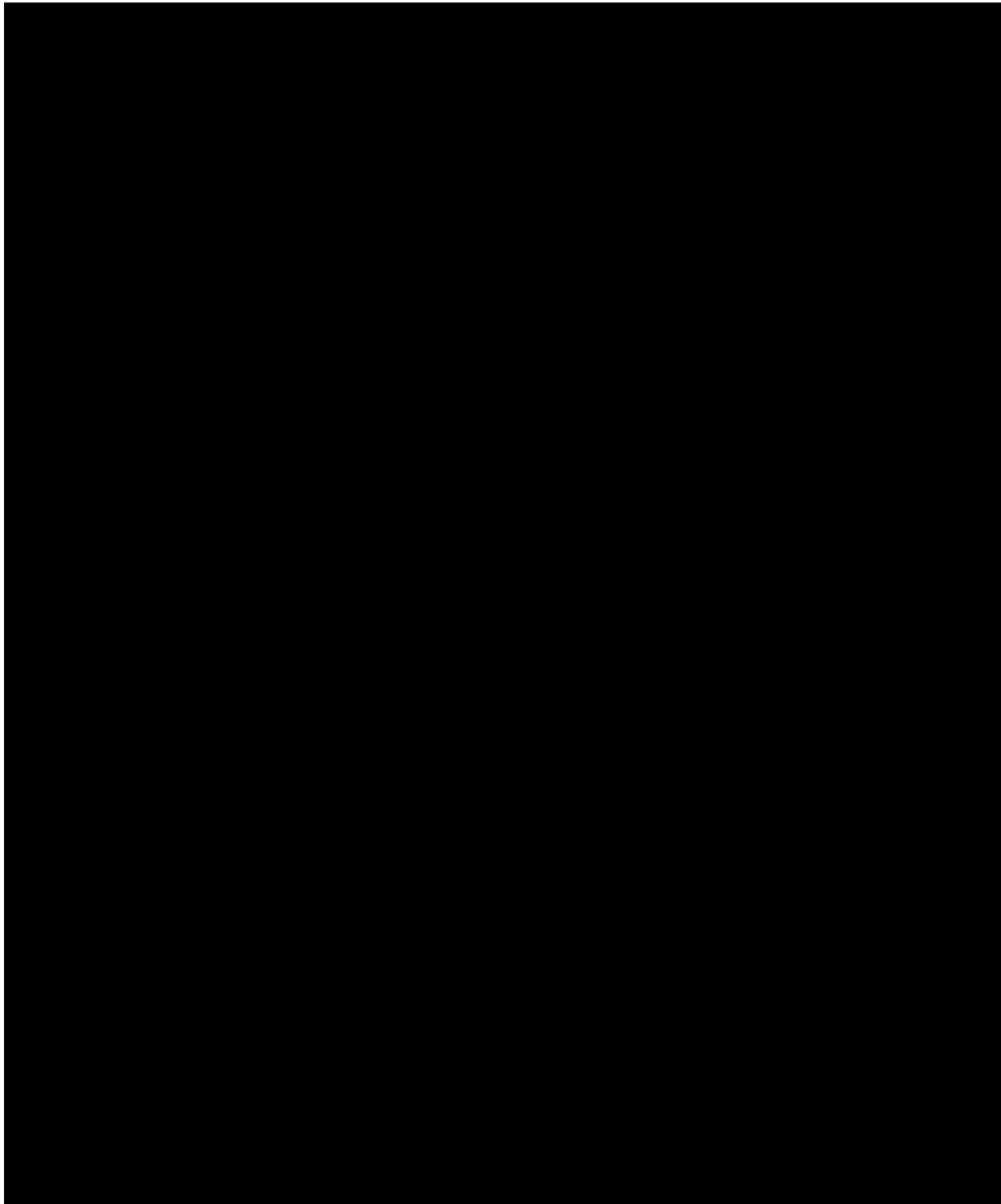
Figure 3.1: Cross section showing stratigraphy and lateral continuity of major formations across the AoR.

The Class VI injection wells will target injection in the [redacted] sands. [redacted]

[redacted]

[redacted]

[redacted] Well data, open-hole well logs and core (Figure 3.2), define the subsurface geological characteristics of stratigraphy, lithology and rock properties.



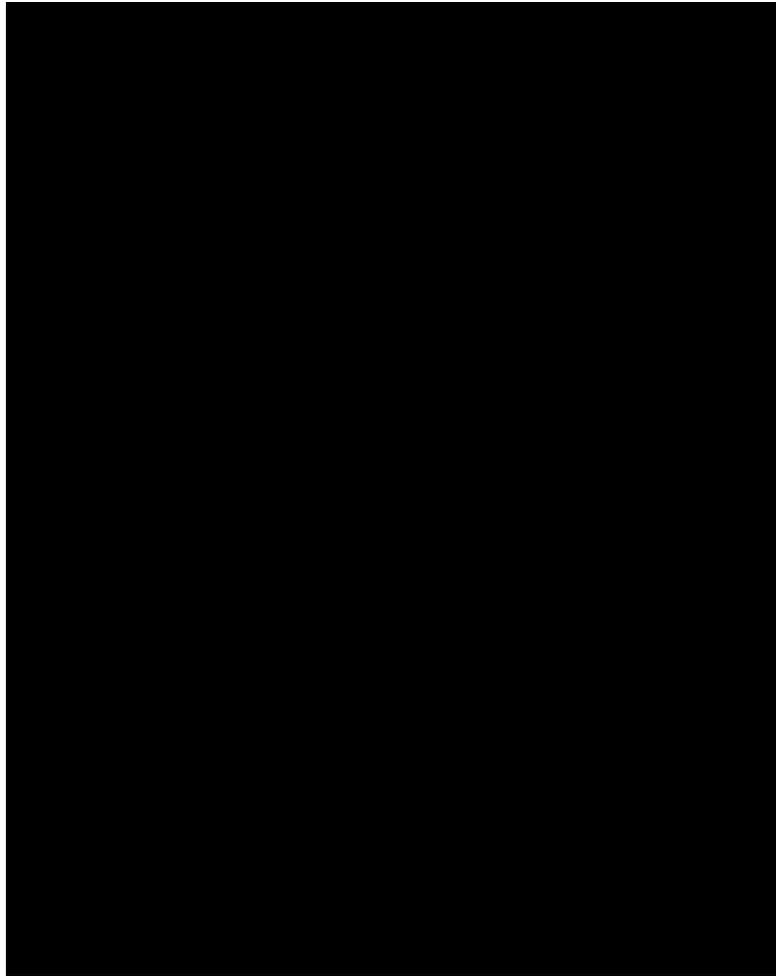
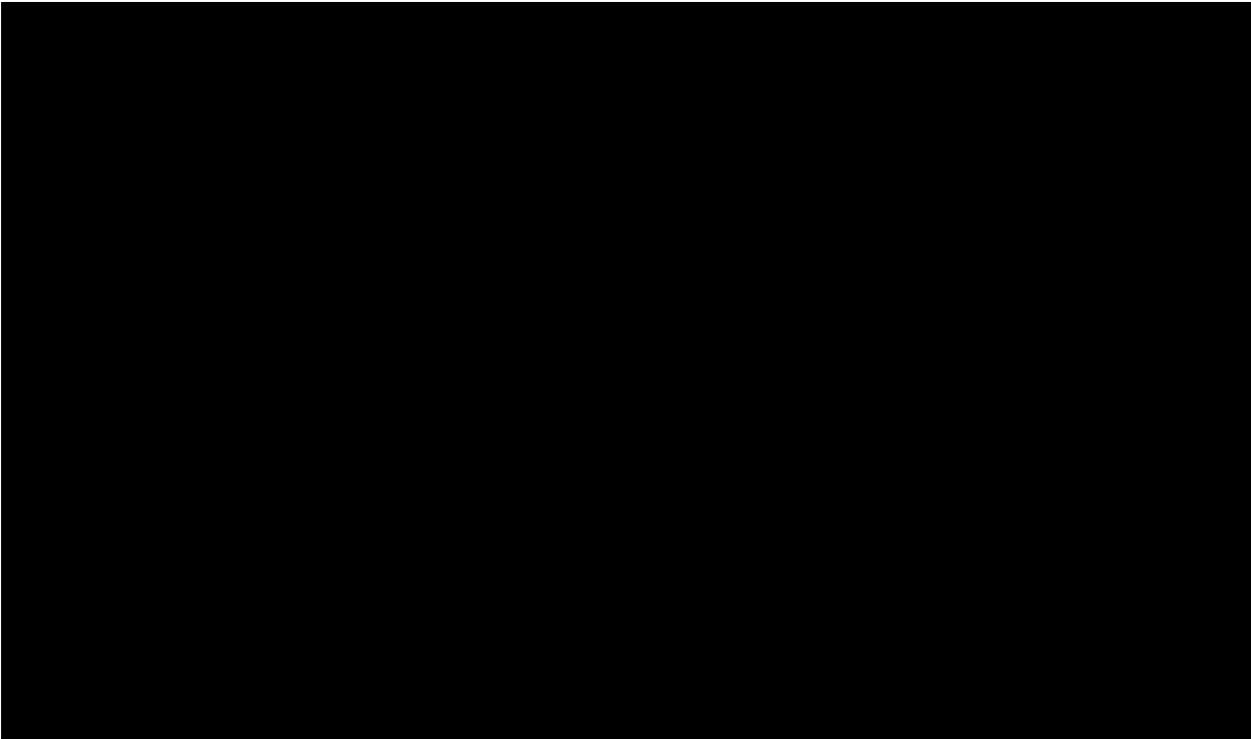
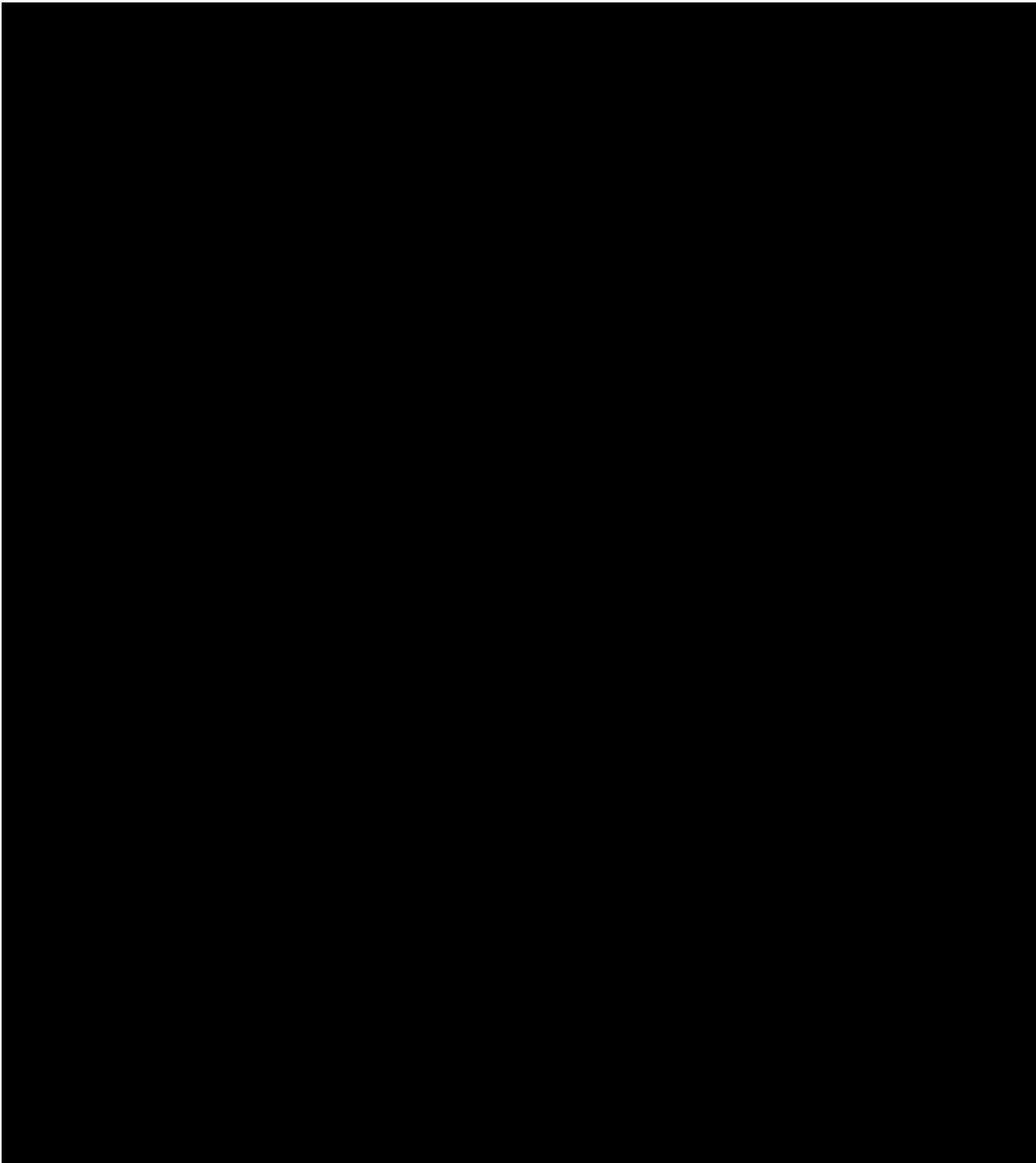


Figure 3.3: Plan view of the model boundary and geo-cellular grid used to define the CO₂ plume extent and associated AoR.

The open-hole logs have a half-foot resolution and a constant vertical cell height of 20 feet was utilized over the model domain to generate grid layers as shown in **Figure 3.4**. The 20-foot cell height provides the vertical resolution necessary to capture significant lithologic heterogeneity (sand versus shale) which helps to ensure accurate upscaling of log data and distribution of reservoir properties in the static model. **Figure 3.5** shows a comparison of open-hole log data and the associated upscaled logs for a well within the AoR.





3.1.4 Porosity and Permeability

Wireline log data was acquired with measurements that include but are not limited to spontaneous potential, natural gamma ray, borehole caliper, compressional sonic, resistivity as well as neutron porosity and bulk density.

Formation porosity is determined one of two ways: from bulk density using 2.65 g/cc matrix density as calibrated from core grain density and core porosity data, or from compressional sonic using 55.5 $\mu\text{sec}/\text{ft}$ matrix slowness and the Raymer-Hunt equation.

Volume of clay is determined by spontaneous potential and is calibrated to core data.

Log-derived permeability is determined by applying a core-based transform that utilizes capillary pressure porosity and permeability along with clay values from XRD or FTIR. Core data from two wells with 13 data points was used to develop a permeability transform (**Figure 3.6**). The transform from core data is illustrated in **Figure 3.7**.

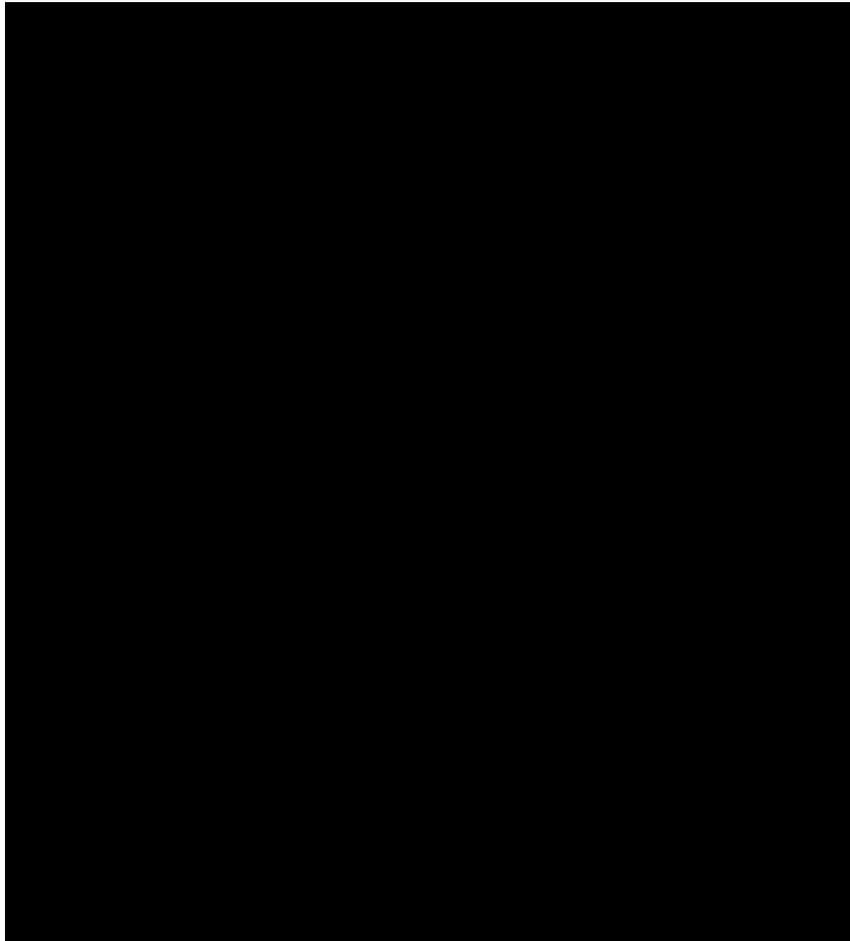


Figure 3.6. Location of wells with core data used for permeability transform.

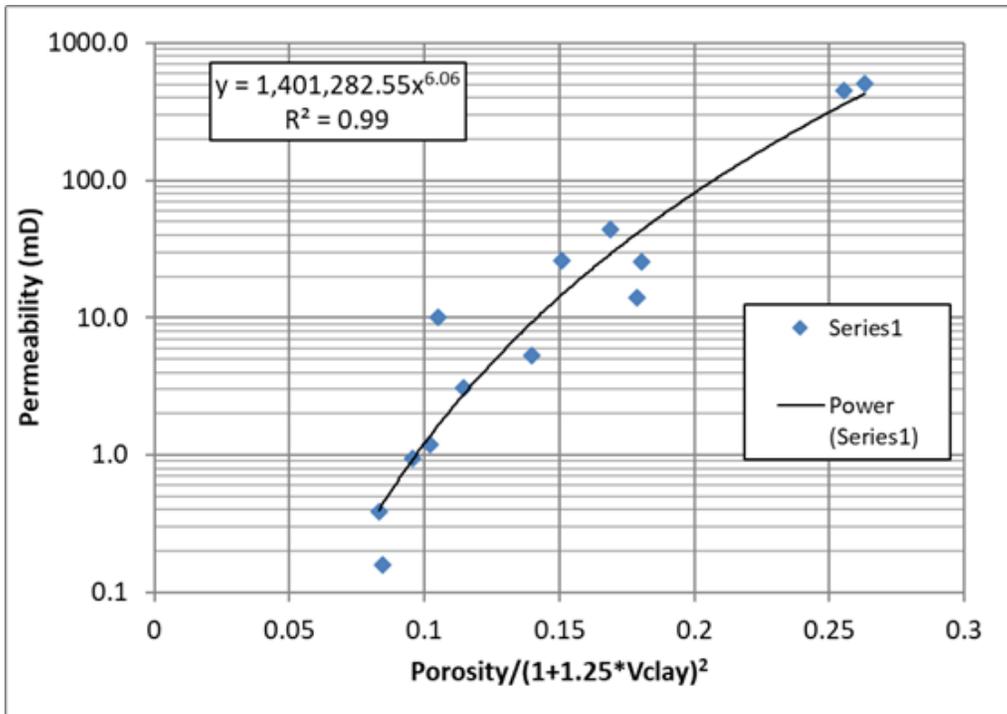


Figure 3.7. Permeability transform for Sacramento Basin zones

Figure 3.8 shows porosity and permeability histograms for [REDACTED]. Porosity is derived from open-hole well log analysis and permeability is a function of porosity and clay volume. **Figure 3.8** shows the distribution of permeability and porosity using Sequential Gaussian simulation (kriging) within the static model.

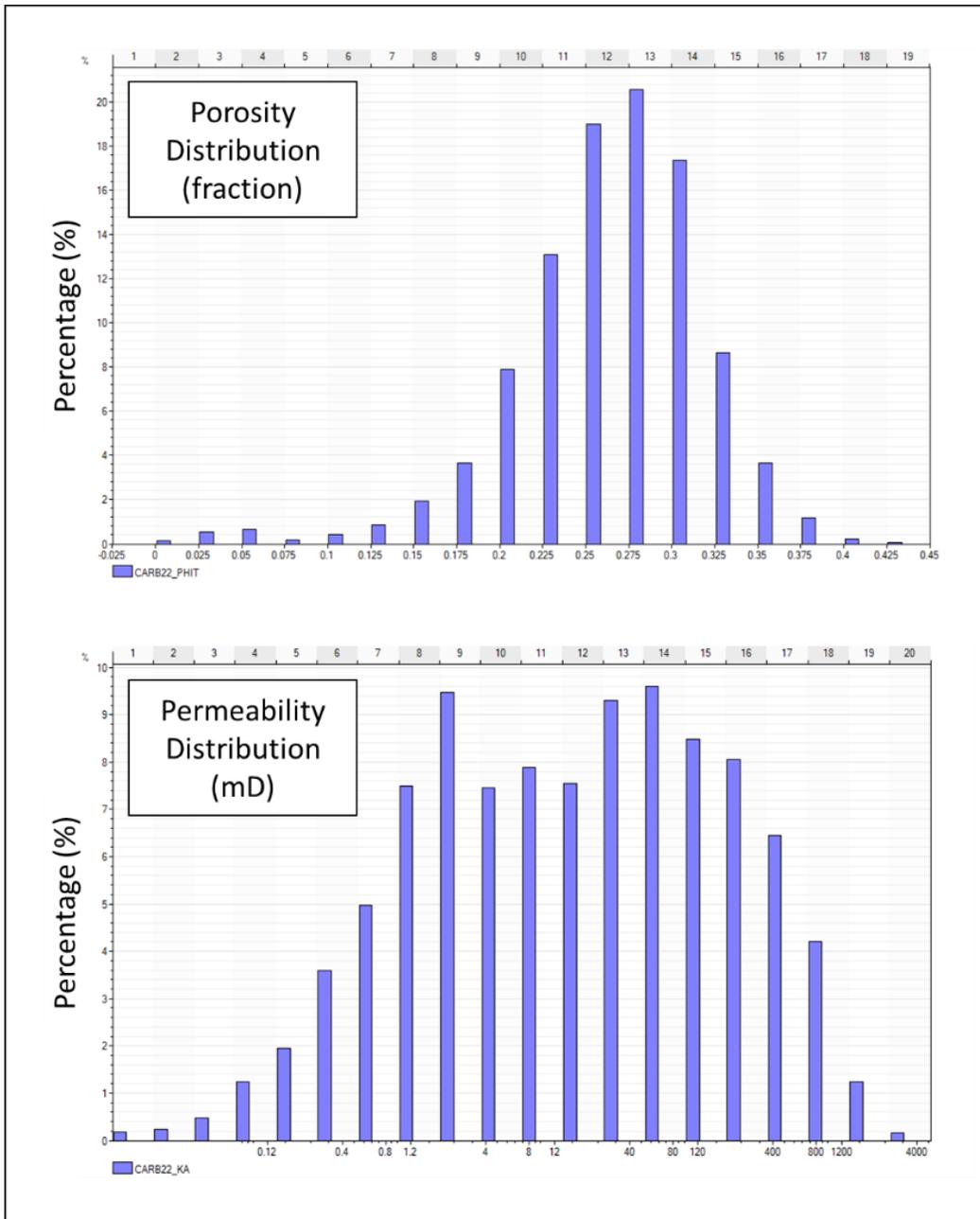


Figure 3.8. [redacted] porosity and permeability distribution in the static model.

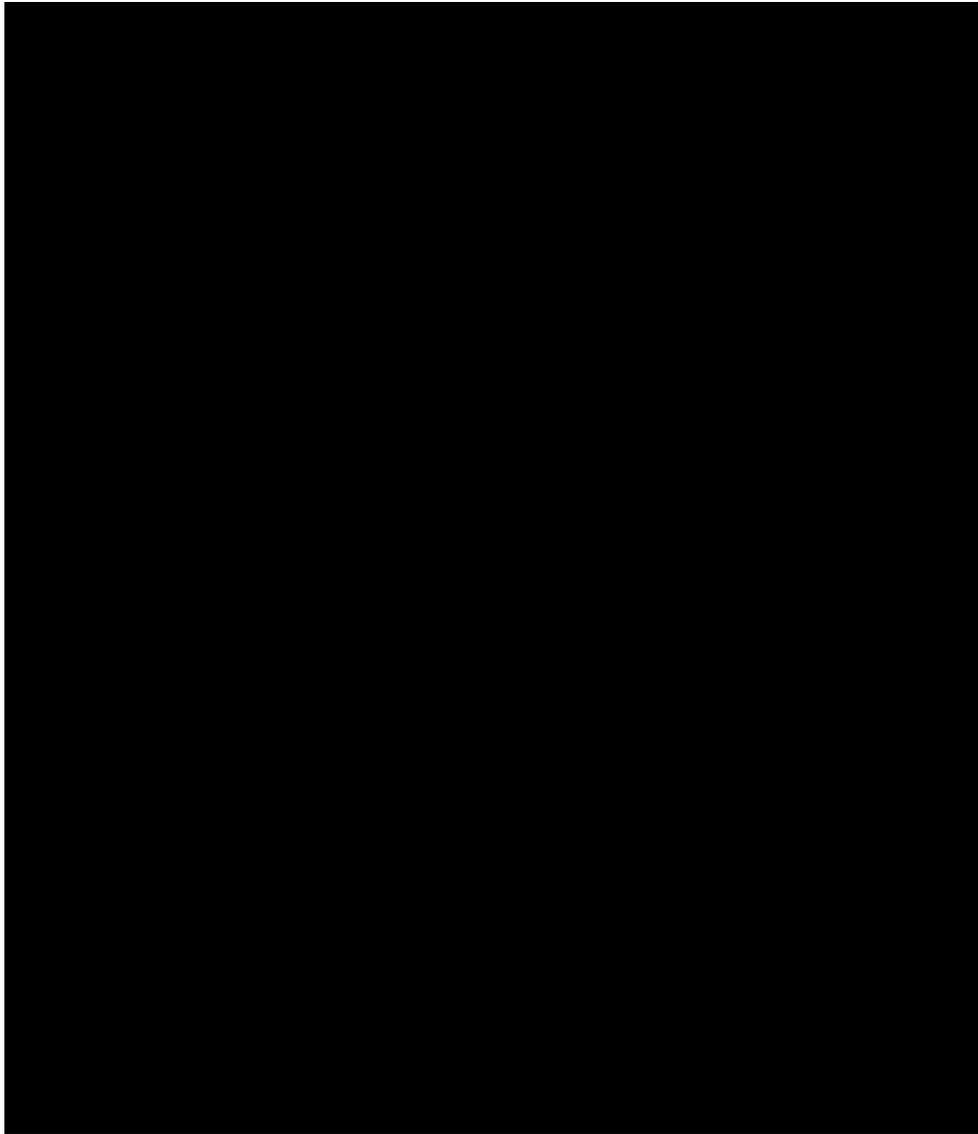


Figure 3.9. Sections through the static grid showing the distribution of porosity and permeability in the reservoir.

3.1.5 Constitutive Relationships and Other Rock Properties

[REDACTED]

[REDACTED] The simulation and AoR will be updated once site specific core data is obtained during the pre-operational testing phase.

Figure 3.10 and 3.11 shows the relative permeability curve and capillary pressure curve used in the computational modeling.

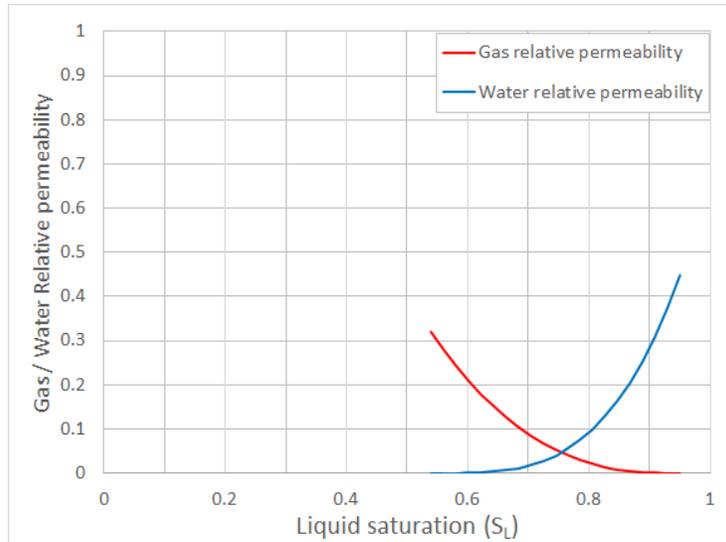


Figure 3.10. Relative permeability curves for Gas-Water system

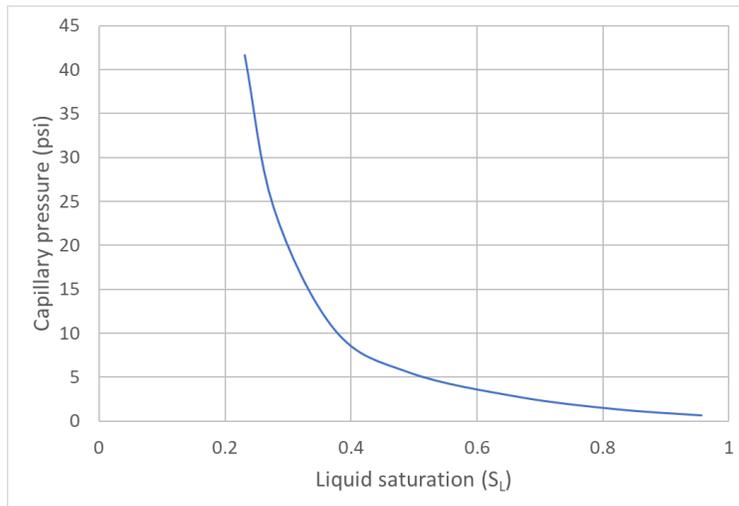


Figure 3.11. Capillary pressure curve

3.1.6 Mineralization

Previous studies into reactive transport modeling and geochemical reaction in CCS have shown that the amount of CO₂ trapped by mineralization reactions is extremely small over a 100-year post injection time frame (IPCC, 2005: IPCC Special Report on Carbon Dioxide Capture and Storage, prepared by Working Group III of the Intergovernmental Panel on Climate Change) for sandstone reservoirs.

Due to the low salinity expected for [REDACTED] the stable mineralogy of the formation, minor expected effect on the AoR and for computational efficiency, reactive transport was not included as a part of the compositional simulation modeling done for the project at this time.

Geochemical modeling was carried out separately using USGS software PHREEQC. Details of the methodology and results can be found in the attached Appendix: CTV III Geochemical Modeling.

3.1.7 Boundary Conditions

The following Boundary conditions were applied to the model domain:

The overlying Capay shale which is continuous and present at thickness >100' over the model domain has low permeability, has been shown to be a proven hydrocarbon seal over the model domain and was thus set as a no flow boundary.

The Western, Southern and part of the Eastern edge of the model domain, defined by the Midland, West Tracy and Stockton Arch faults were set as no-flow boundaries due to the known sealing nature of these faults, which is discussed in detail in Section 2.3 of Attachment A.

The remaining Northern and part of the Eastern edges of the model domain were modeled as open boundaries using large volume modifiers at the edge cells to model an infinite aquifer.

3.1.8 Initial Conditions

Initial model conditions (start of CO2 injection) of the [REDACTED] are given in Table 3.2.

Table 3.2. Initial conditions.

| Parameter | Value or Range | Units | Corresponding Elevation (ft MSL) | Data Source |
|--------------------|----------------|------------------------|----------------------------------|--|
| Temperature | 151 | Fahrenheit | 6,900 | Bottom hole temperature data from logs in the area |
| Formation pressure | 2860 | Pounds per square inch | 6,900 | [REDACTED] [REDACTED] [REDACTED] |
| Salinity | 15,500 | Parts per million | 6,900 | Water analysis and Log calculated salinity curves |

3.1.9 Operational Information

Details on the injection operation are presented in Table 3.3. Further details are provided in the Narrative document and in the Operational Procedures Appendix.

Table 3.3. Operating details.

| Operating Information | Injection Well C1 | Injection Well C2 | Injection Well E1 | Injection Well E2 | Injection Well W1 | Injection Well W2 |
|---|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|
| [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] |
| [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] |
| [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] |
| No. of perforated intervals | 11 | 5 | 14 | 6 | 7 | 8 |
| Perforated interval (ft TVD) Top Bottom | 6176 7016 | 7192 7790 | 6010 6950 | 6980 7720 | 6150 6930 | 7020 7840 |
| Casing diameter (in.) | 7 | 7 | 7 | 7 | 7 | 7 |
| [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] |
| [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] |
| [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] |
| [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] |

*If planned injection rates change year to year, add rows to reflect this difference, and include an average injection rate per year (or interval if applicable).

3.1.10 Fracture Pressure and Fracture Gradient

Calculated fracture gradient and target injection pressure values are given in Table 3.4.

A fracture pressure gradient of 0.76 psi/ft is assumed for the injection zone. T [REDACTED]

CTV will conduct a step rate test in the injection zone as part of the pre-operational testing plan to confirm this fracture pressure gradient.

At this time, no fracture gradient information has been found for the CTV will conduct a step rate test for the as part of the pre-operational testing.

CTV will ensure that the injection pressure is below 90% of the injection zone fracture gradient at the top of perforations in the injection wells (Table 3.4). CTV expects to operate the wells with a planned bottom hole injection pressure well below the maximum allowable injection pressure calculated using the fracture gradient and safety factor.

Table 3.4. Injection pressure details.

| Injection Pressure Details | Injection Well C1 | Injection Well C2 | Injection Well E1 | Injection Well E2 | Injection Well W1 | Injection Well W2 |
|---|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| Fracture gradient (psi/ft) | 0.76 | 0.76 | 0.76 | 0.76 | 0.76 | 0.76 |
| Maximum allowable injection pressure (90% of fracture pressure) (psi) | 4224 | 4919 | 4111 | 4774 | 4207 | 4802 |
| Elevation corresponding to maximum injection pressure (ft TVD) | 6178 | 7192 | 6011 | 6984 | 6155 | 7020 |
| Elevation at the top of the perforated interval (ft TVD) | 6178 | 7192 | 6011 | 6984 | 6155 | 7020 |
| Calculated maximum injection pressure at the top of the perforated interval (psi) | 4224 | 4919 | 4111 | 4774 | 4207 | 4802 |
| Planned injection pressure (psi) / gradient (psi/ft) at top of perforations | 3050 / 0.494 | 3566 / 0.496 | 2901 / 0.483 | 3363 / 0.482 | 2961 / 0.481 | 3504 / 0.499 |

3.2 Computational Modeling Results

3.2.1 Predictions of System Behavior

Figure 3.12 and **Figure 3.13** show the computational modeling results and development of the CO₂ plume at different time steps. The boundaries of the CO₂ plume have been defined with a 0.01 CO₂ global mole fraction cutoff.

As shown in **Figure 3.12**, the CO₂ extent is largely defined by [REDACTED] after the end of injection. The majority of the CO₂ injectate remains as super-critical CO₂ (83%) with the remaining portion of the CO₂ dissolving in the formation brine over the simulated 100 years post injection.

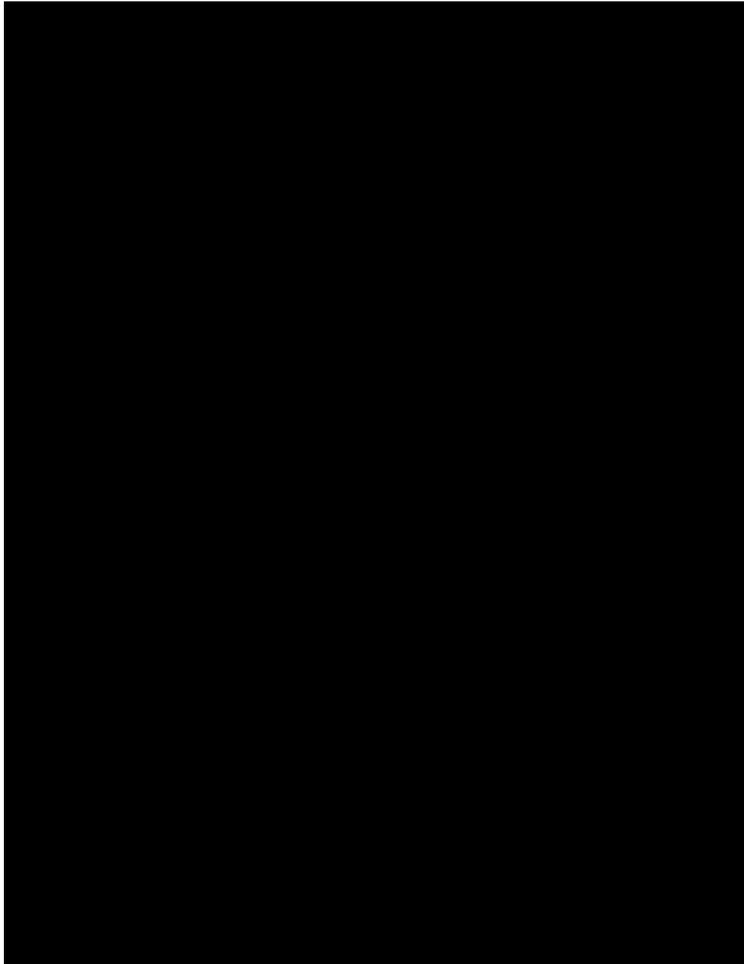


Figure 3.12: Plume development through time: [REDACTED]

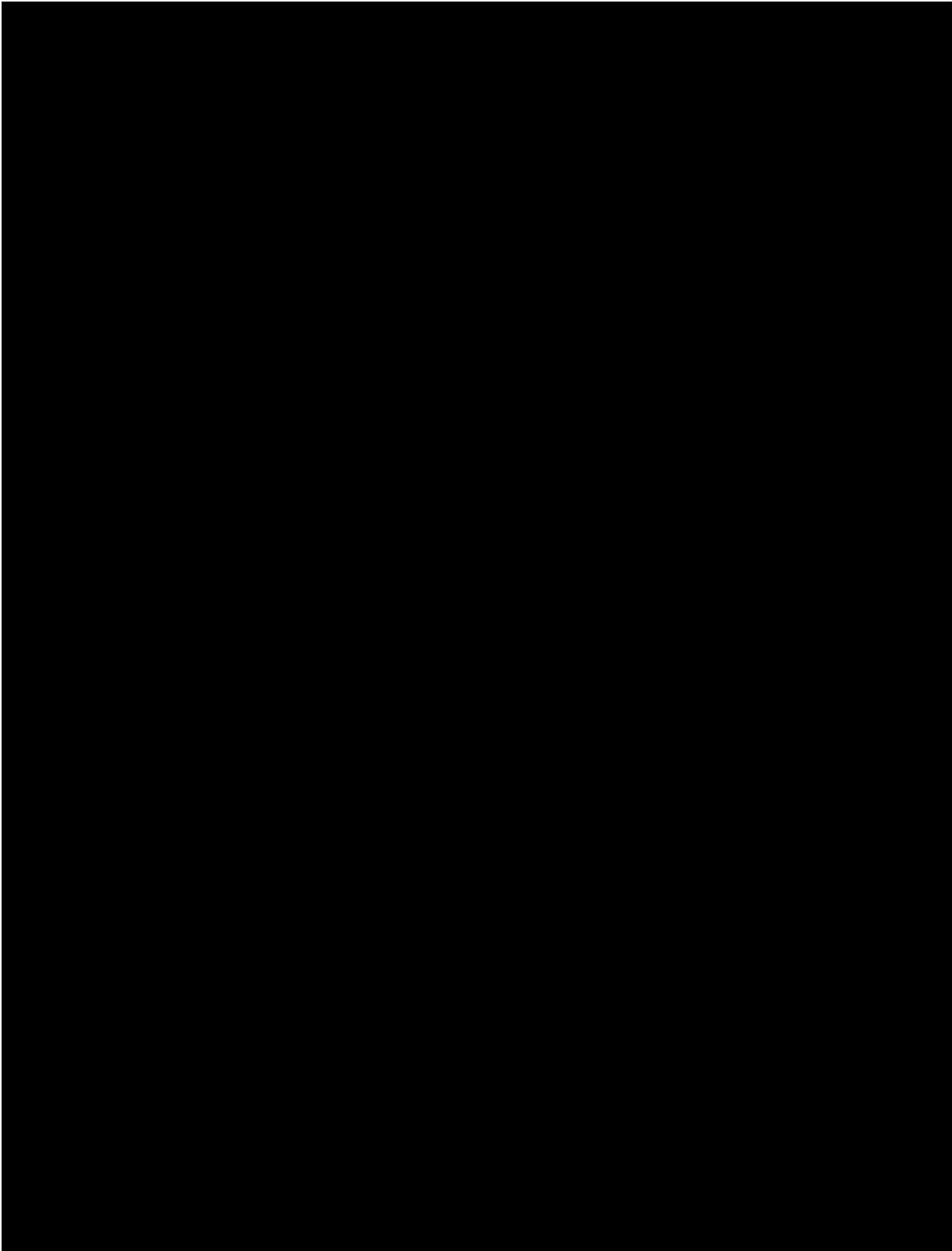


Figure 3.13. Cross-sections showing plume development at various time steps through the project.

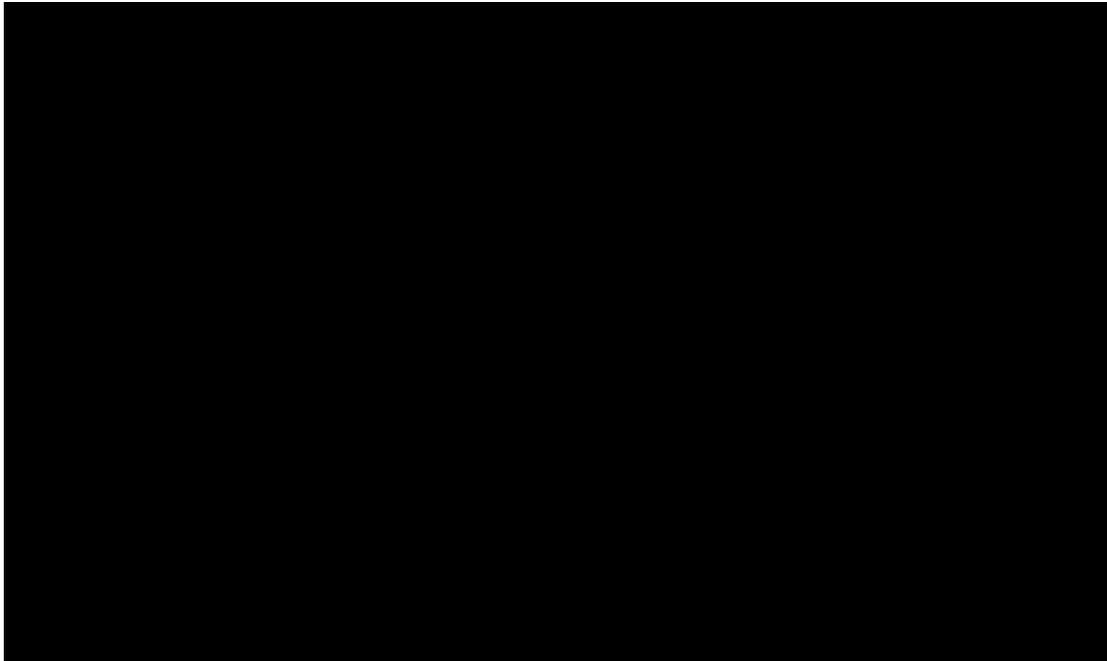


Figure 3.14. CO₂ storage mechanisms in the reservoir.

3.2.2 Model Calibration and Validation



3.2.2.1 CO₂ Injectate effect on Plume and AoR modeling results

The Plume model developed in the Computer Modeling Group (CMG) GEM software was run for the two simplified injectate compositions, and their results were also compared against a 100% CO₂ injectate case. The cumulative volume of injectate for all 3 cases was the same.

The CO₂ plume for Injectate 1 and Injectate 2 is consistent with the plume outline for 100% CO₂ injectate (Figure 1), which was defined by a 0.05 global CO₂ mole fraction for all 3 cases. The 100 year post end of injection plumes for the 3 cases are shown below in Figure 1. The wells that fall within the CO₂ plume are the same for all 3 cases.

Similarly, the AoR was delineated using Critical pressure for the 3 cases and was found to be consistent. Details on the Critical pressure calculation method are discussed in the “Attachment B – AoR and Corrective Action” document. Figure 3.15 shows the AoR boundary for the 3 cases. Additionally, the average Pore Volume pressure within the approximate AoR boundary was plotted for the 3 cases and was found to be very close with a maximum difference of ~3 psi seen between the cases, as shown in Figure 3.16. Multiple scenarios were also ran to test the effect of mixing Injectate 1 and Injectates 2 in different ratios on the AoR boundary and plume shapes. As expected, since the resulting mixed injectates were still high purity CO₂ streams with impurity concentrations in-between those of Injectates 1 and 2, the AoR boundaries and Plume shapes for

these scenarios were within the envelope represented by the end point compositions - Injectate 1 and 2.

In summary, there is minimal effect of the minor components on the CO2 plume shape and the AoR boundary, for the proposed injectate compositions. As such, CTV's Plume and AoR modeling for Corrective Action assessment is adequate. CTV will confirm that the properties of the injectate are consistent with the model inputs at pre-operational injectate sampling and will do so for any additional sources. In addition, the AoR will be reviewed as per section 3.4 Reevaluation Schedule and Criteria section.





3.2.2.2 Sensitivity cases

In addition, scenarios were run to test the effect of varying major model inputs on the CO₂ plume and AoR extent.

Table 3.5. Simulation sensitivity scenarios

| Scenario | CO₂ plume & AoR impact |
|--|--|
| Porosity: 10% reduction from base case | Minimal Impact |
| Porosity: 10% increase from base case | Minimal Impact |
| Permeability: 10% reduction from base case | Minimal Impact |
| Permeability: 10% increase from base case | Minimal Impact |

These scenarios and the comparison against previous work in the area provides us with confidence in the CO₂ plume extent and AoR, and that the corrective action well review and potential impact to the USDW has been appropriately evaluated.

3.2.3 AoR Delineation

The AoR delineation was based on the methods of Nicol et al. (2008), which is referenced in the US EPA AoR and Corrective Action Guidance. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

For the purpose of calculating the critical pressure and delineating the AoR for the project area, [REDACTED], and the following equations were used to calculate critical pressure across the model domain:

$$\Delta P_{C,norm} = g(Z_V - Z_I) \left[\frac{\lambda - \xi}{2} (Z_V - Z_I) + \rho_{I,\lambda} - \rho_I \right] \quad - \text{Eq (1)}$$

$$\Delta P_c = \Delta P_{C,norm} + \Delta P_u \quad - \text{Eq (2)}$$

Where,

- $\Delta P_{C,norm}$ - the admissible overpressure in a normally pressured aquifer before fluid in the injection zone would flow into the USDW through a hypothetical open conduit
- ΔP_c - the admissible overpressure in an under-pressured aquifer before fluid in the injection zone would flow into the USDW through a hypothetical open conduit
- ΔP_u - the difference of normal pressure to actual pressure in the under-pressured aquifer, assumed [REDACTED] across the model domain
- g - acceleration due to gravity, 9.81m/s²
- Z_V - Elevation of the injection zone
- Z_I - Elevation of the base of the USDW
- λ - density gradient in the conduit at constant injection zone brine TDS
- ξ - density gradient in the conduit at initial condition
- $\rho_{I,\lambda}$ - Density of the injection zone brine at USDW depth
- ρ_I - Density of the brine in the conduit at USDW depth at initial condition

An average TDS of 15,500ppm was assumed for the injection zone and an average TDS of 7,900ppm was assumed for the USDW based on Salinity calculations in the project area. Injection zone and USDW depths were based on the model grid and USDW mapping in the project area. Density and density gradients were calculated as a function of temperature and salinity using standard methods (McCutcheon et. al. 1993). Using these, the critical pressure was calculated at each grid point in the Petrel model using **Equations 1 & 2**, and combined with the pressure outputs from the plume simulation to delineate an AoR boundary at different timesteps. The final AoR boundary was based on the outermost threshold overpressure 14 years into the injection which is when the maximum extent was seen. **Figure 3.19** shows the AoR extent, CO₂ plume extent, injector locations and proposed monitoring well locations. Details on the monitoring wells are discussed in further detail in Attachment C – Testing and Monitoring Plan.

[REDACTED]



Figure 3.19: Map showing the location of injection wells and monitoring wells.

3.3 Corrective Action

3.3.1 Tabulation of Wells within the AoR

[REDACTED]
[REDACTED]
[REDACTED]. As such, there are excellent records for wells drilled in the study area. There have been no undocumented historical wells found in the AoR.

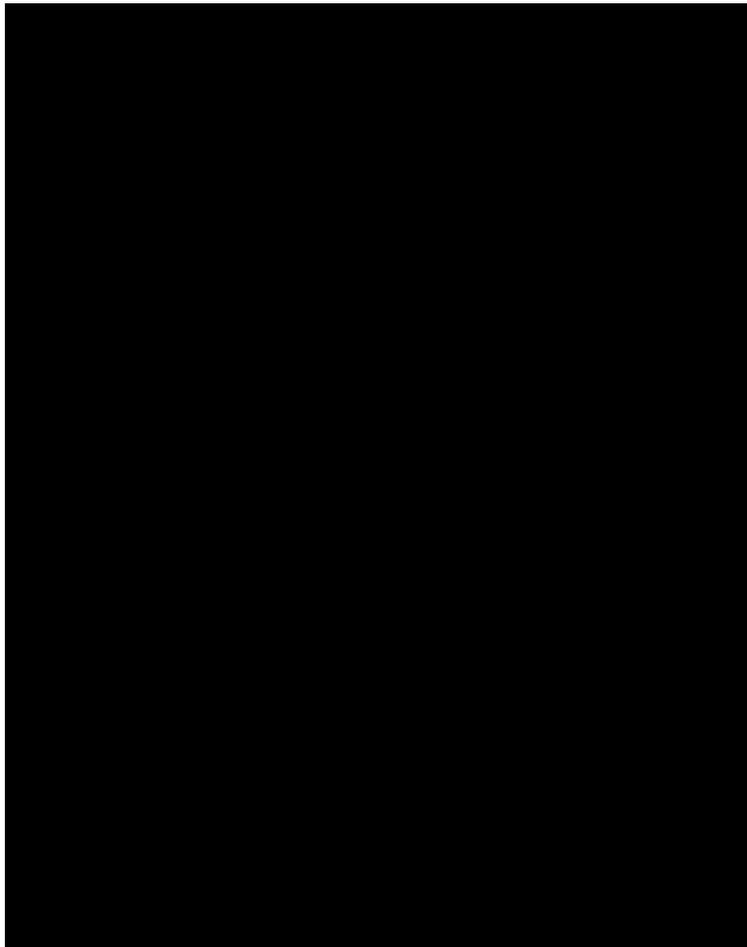
CTV accessed internal databases as well as California Geologic Energy Management Division (CalGEM) information to identify and confirm wells within the AoR.

Table 3.6 provides counts of the AoR wellbores by status and type, for each wellbore with a unique API-12 identifier. Appendix B-1 provides a complete list of all wellbores by API-12 within the AoR. As required by 40 CFR 146.84(c)(2), the well table in Appendix B-1 describes each well's type, construction, date drilled, location, measured depth, true vertical depth, completion record relative to [REDACTED] injection zone, record of plugging, requirement for

corrective action, if necessary. CTV also identifies well work to be completed during the pre-operational testing phase.

Table 3.6: Wellbores in the AoR by Status

| Status | Count |
|-----------------------|--------------|
| Active | 0 |
| Idle | 0 |
| Plugged and Abandoned | 46 |
| Total | 46 |



3.3.2 Protection of USDW

For the project area, CTV assessed USDW protection by evaluating all wellbores that penetrate the [REDACTED]. The corrective action assessment included the generation of detailed casing diagrams for each wellbore, review of all perforations, top of cement assessment for each casing string, and determination of cement plug depths. Non-endangerment of USDW will be ensured during all stages of the project.

3.3.3 Wells Penetrating the Confining Zone

The depth of the confining zone in each of the wells penetrating [REDACTED] was determined by interpretation of open-hole well logs and utilizing the deviation survey. All wells in the AoR penetrate the [REDACTED] confining zone. These wells also penetrate [REDACTED] storage reservoir.

3.3.4 [REDACTED] Isolation

All forty-six wells within the AOR penetrate [REDACTED], and none will be used for the project. If isolation of this formation is determined to be deficient in such a way that USDW may be impacted, corrective action plans will be communicated and implemented prior to injection to ensure non-endangerment of USDW.

3.3.5 Corrective Action Assessment of Wells in AoR

[REDACTED]

[REDACTED]

[REDACTED] A map with these wells is shown in Figure 3.20, and the table of wells in Appendix B-1 provides well information pursuant to 40 CFR §146.84(c)(2).

3.3.6 Plan for Site Access

CTV has obtained surface access rights for the duration of the project.

3.3.7 Corrective Action Schedule

[REDACTED] CTV will ensure that CO₂ is confined to the injection zone within the AoR, protecting the overlying USDW and ensuring confinement.

Through time, if the plume development is not consistent with the predicted results, computational modeling will be updated to reassess the AoR. In this event, all wells in the updated AoR will be subject to the Corrective Action Plan and be remediated if necessary.

3.4 Reevaluation Schedule and Criteria

3.4.1 AoR Reevaluation Cycle

CTV will reevaluate the above described AoR at a minimum every five years during the injection and post-injection phases, as required by 40 CFR 146.84 (e).

Simulation study results are reviewed when operating data is acquired. Preparation of necessary operational data for the review includes injection rates and pressures, CO₂ injectate concentrations, and monitoring well information (storage reservoir and overlying dissipation intervals).

Dynamic operating and monitoring data that will be incorporated into future reevaluation will include:

1. Pressure data from monitoring wells that constrain and define plume development.
2. CO₂ content/saturation from monitoring wells. This data may be acquired with direct aqueous measurements and cased hole log results that will constrain and define plume development.
3. Injection pressures and volumes. The injection pressures and volumes in the computational model are maximum values. If the actual rates are lower than expected, the plume will develop at a slower rate than expected and be reflected in the pressure and CO₂ concentration data in 1 and 2 above.
4. A review of the full suite of water quality data collected from monitoring wells in addition to CO₂ content/saturation (to evaluate the potential for unexpected reactions between the injected fluid and the rock formation).

5. Review and submission of any geologic data acquired since the last modeling effort, including any additional site characterization performed for future injection wells.
6. Reevaluation modeling results will be compared with the most recent modeling (i.e., from the most recent AoR reevaluation). A report describing the comparison of the modeling results will be provided to the EPA with a discussion on whether the results are consistent.
7. Description of the specific actions that will be taken if there are discrepancies between monitoring data and prior modeling results (e.g., remodel the AoR, update all project plans, perform additional corrective action if needed, and submit the results to EPA).

Re-evaluation results will be compared to the original results to understand dynamic inputs affecting plume development and static inputs that would impact injectivity and storage space. Static inputs that may potentially be considered to understand discrepancies between initial and re-evaluation computational models could include permeability, sand continuity and porosity. Although the AoR has been fully delineated, all inputs to the static and dynamic model will be reviewed.

As needed, CTV will review all of the plans that are impacted by a potential AoR increase such as Corrective Action and Emergency and Remedial Response. For corrective action, all wells potentially impacted by a changing AoR will be addressed immediately.

3.4.2 Triggers for AoR Reevaluations Prior to the Next Scheduled Reevaluation

An ad-hoc re-evaluation prior to the next scheduled re-evaluation will be triggered if any of the following occur:

1. Changes in pressure or injection rate that are unexpected and outside three (3) standard deviations from the average will trigger a new evaluation of the AoR.
2. Difference between the computation modeling and observed plume development:
 - a. Unexpected changes in fluid constituents or pressure outside [REDACTED] that are not related to well integrity.
 - b. Reservoir pressures increase versus injected volume is inconsistent with computational modeling results.
 - c. Any other activity prompting a model recalibration.
3. Seismic monitoring anomalies within two miles of the injection well that are indicative of:

- a. The presence of faults near the confining zone that indicates propagation into the confining zone.
 - b. Events reasonably associated with CO₂ injection that are greater than M3.5.
2. Exceeding 90% of the geologic formation fracture pressure in any injection or monitoring wells.
3. Detection of changes in shallow groundwater chemistry (e.g., a significant increase in the concentration of any analytical parameter that was not anticipated by the AoR delineation modeling).
4. Initiation of competing injection projects within the same injection formation within a 1-mile radius of the injection well (including when additional CTV injection wells come online);
5. A significant change in injection operations, as measured by wellhead monitoring;
6. Significant land-use changes that would impact site access; and
7. Any other activity prompting a model recalibration.

CTV will discuss any such events with the UIC Program Director within six months of an event to determine if an AoR re-evaluation is required. If an unscheduled re-evaluation is triggered, CTV will perform the steps described at the beginning of this section of the Plan.

AREA OF REVIEW AND CORRECTIVE ACTION - FIGURES

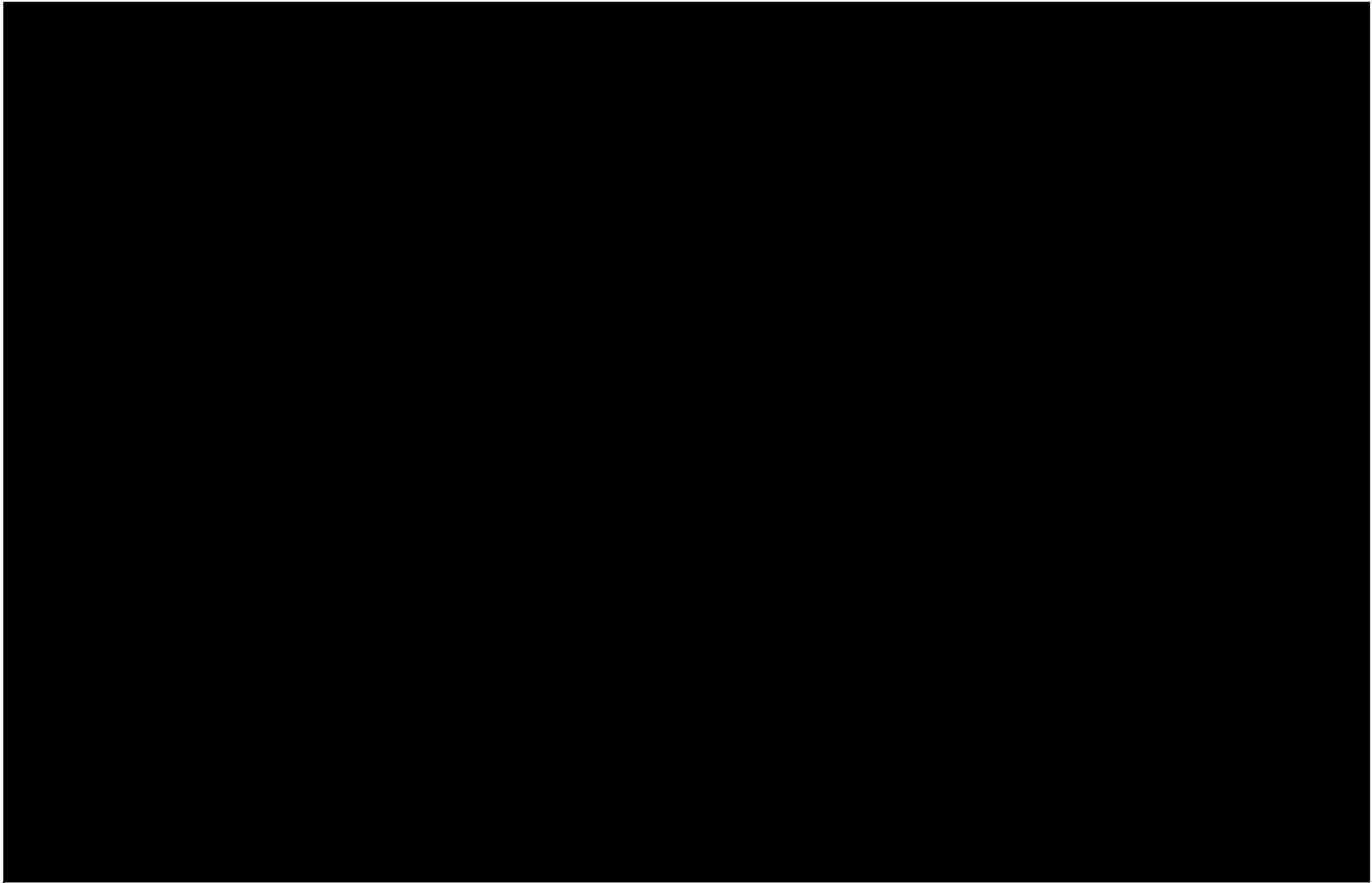


Figure 3.1. Cross section showing stratigraphy and lateral continuity of major formations across the AoR.

[REDACTED]

[REDACTED]

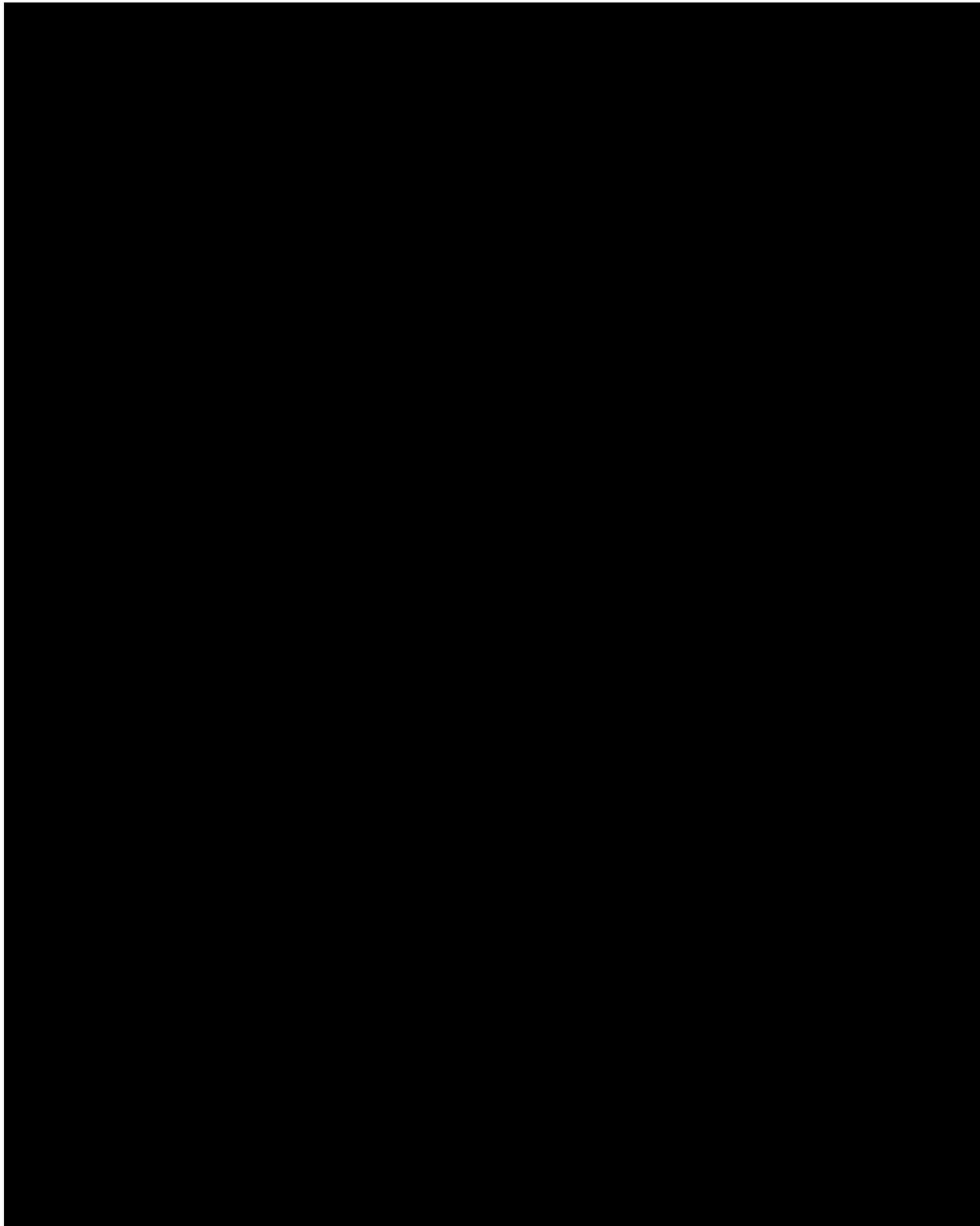
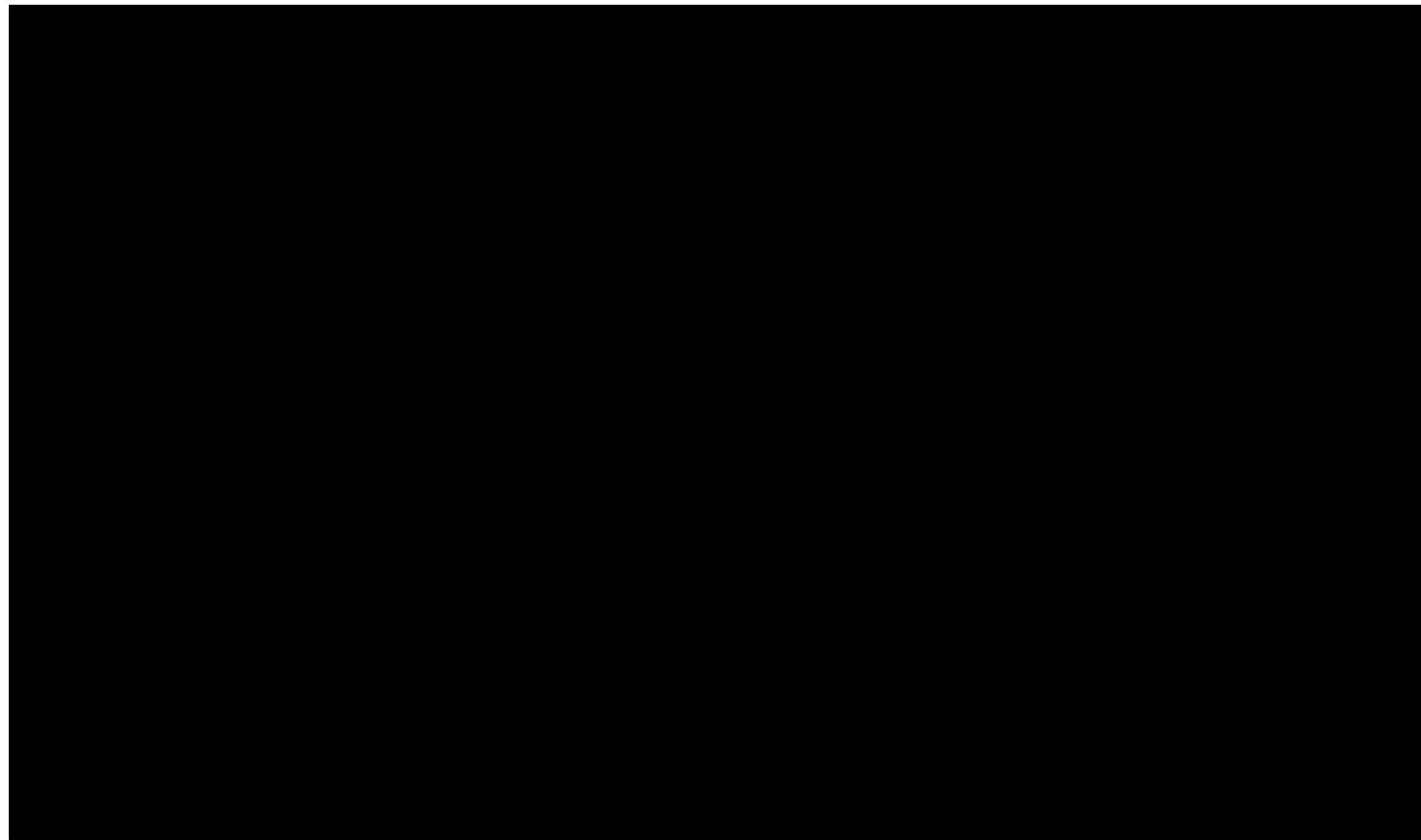
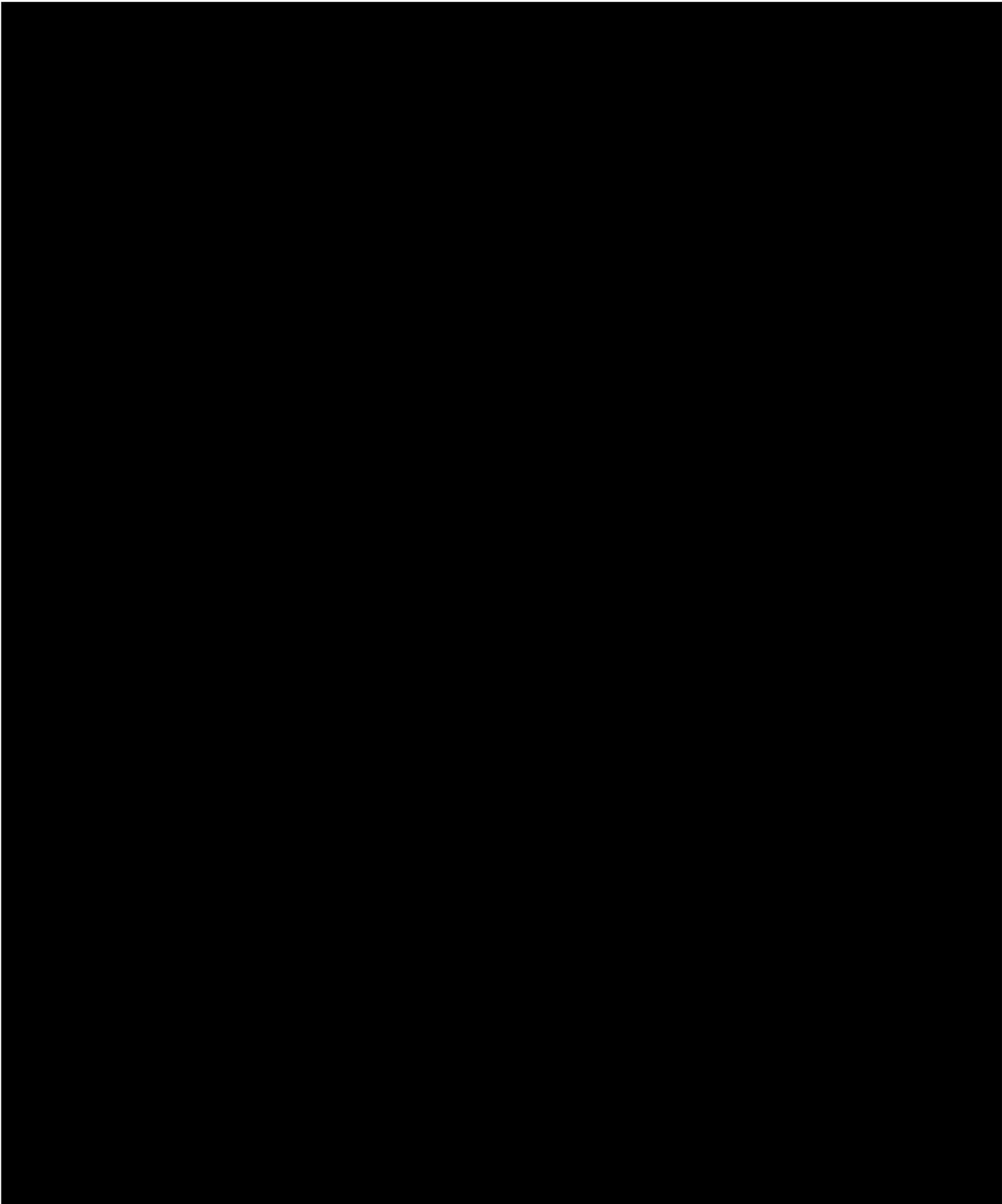


Figure 3.3. Plan view of the model boundary and geo-cellular grid used to define the CO2 plume extent and associated AoR.



[Redacted text]



[Redacted]

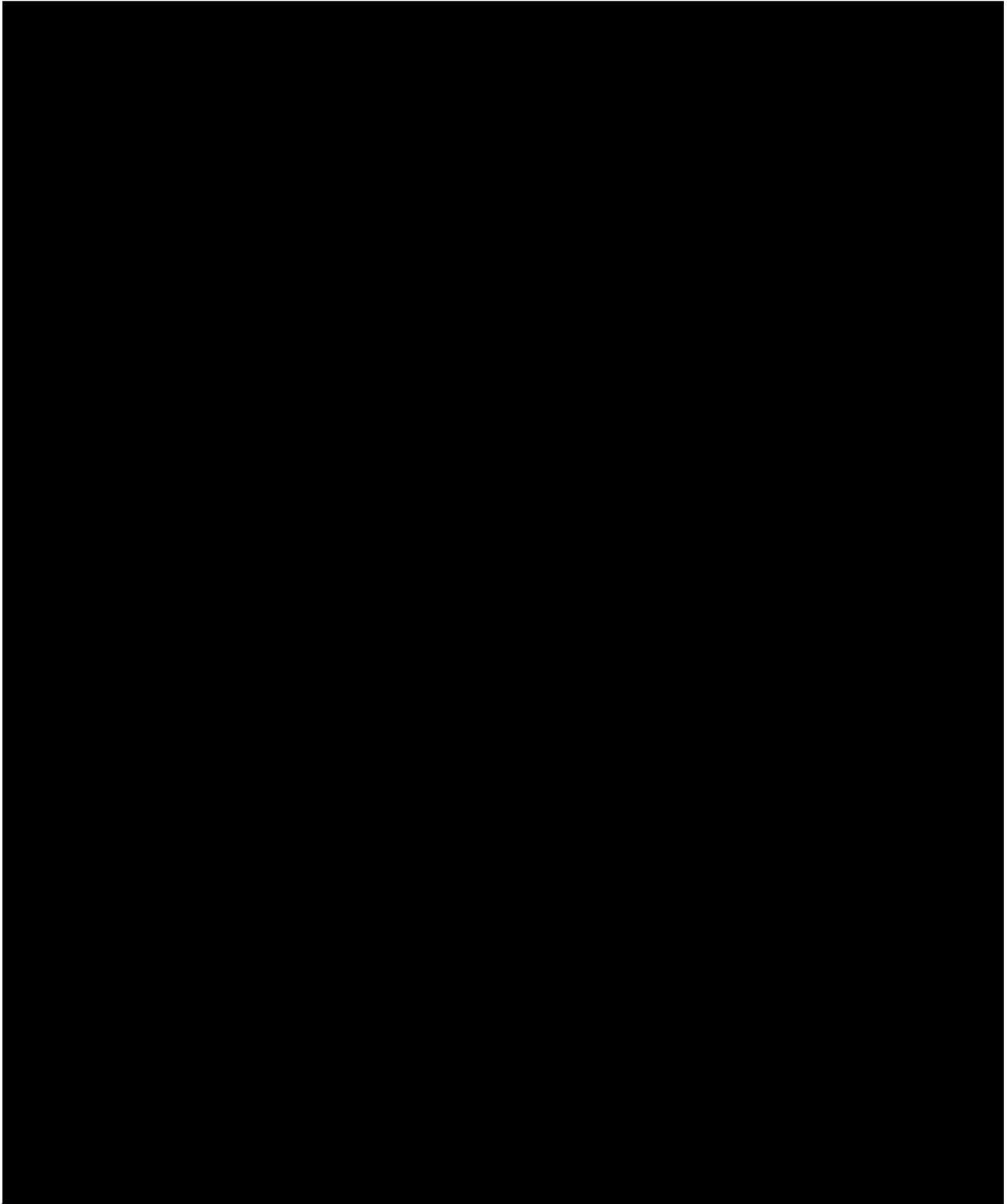


Figure 3.6. Location of wells with core data used for permeability transform.

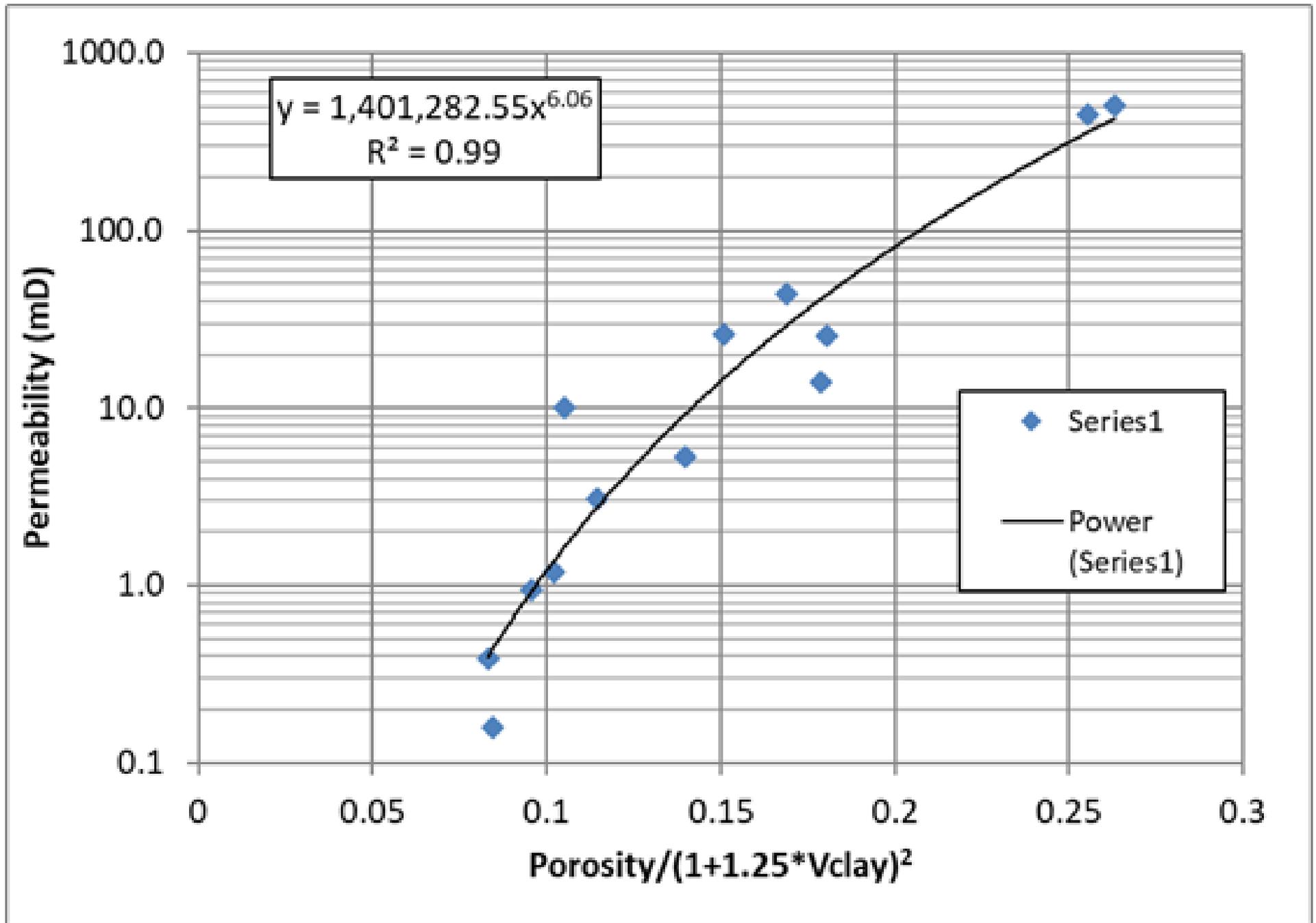


Figure 3.7. Permeability transform for Sacramento Basin zones.

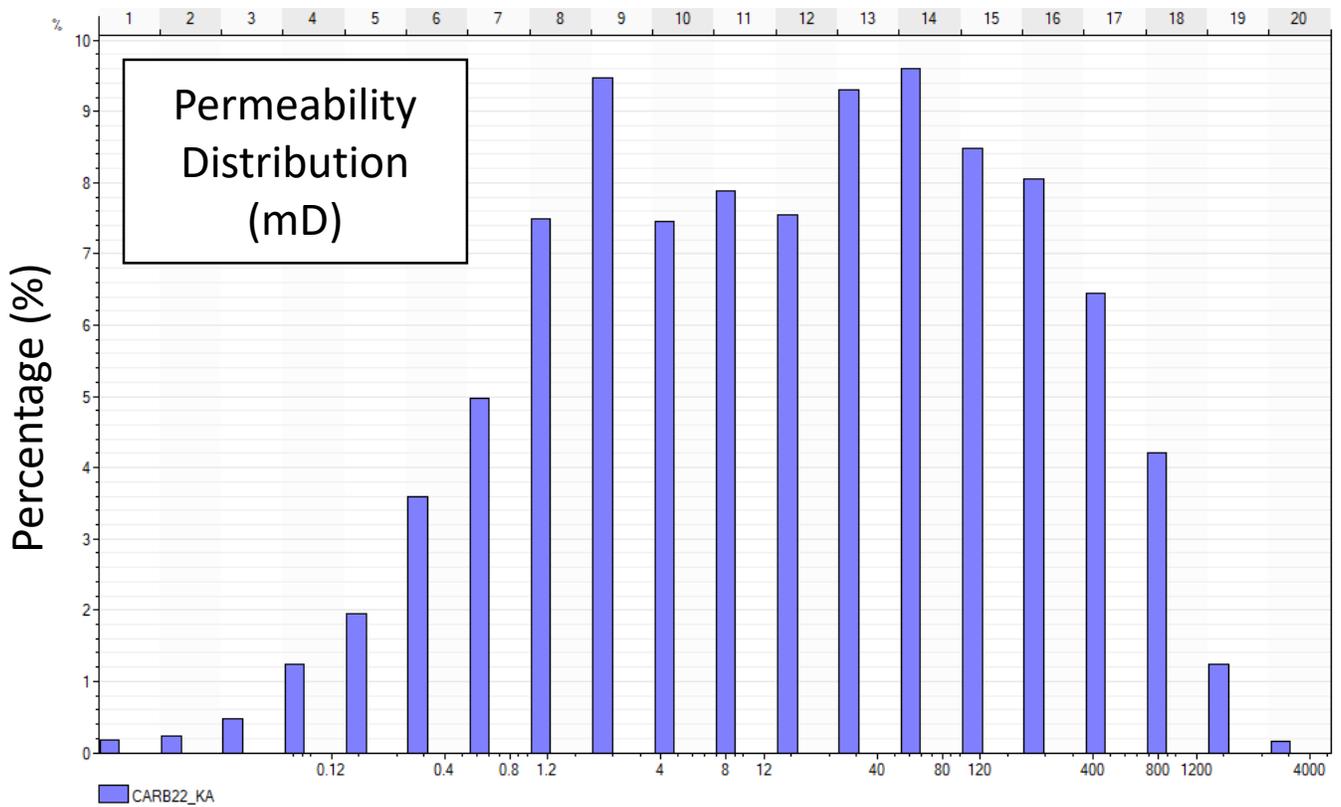
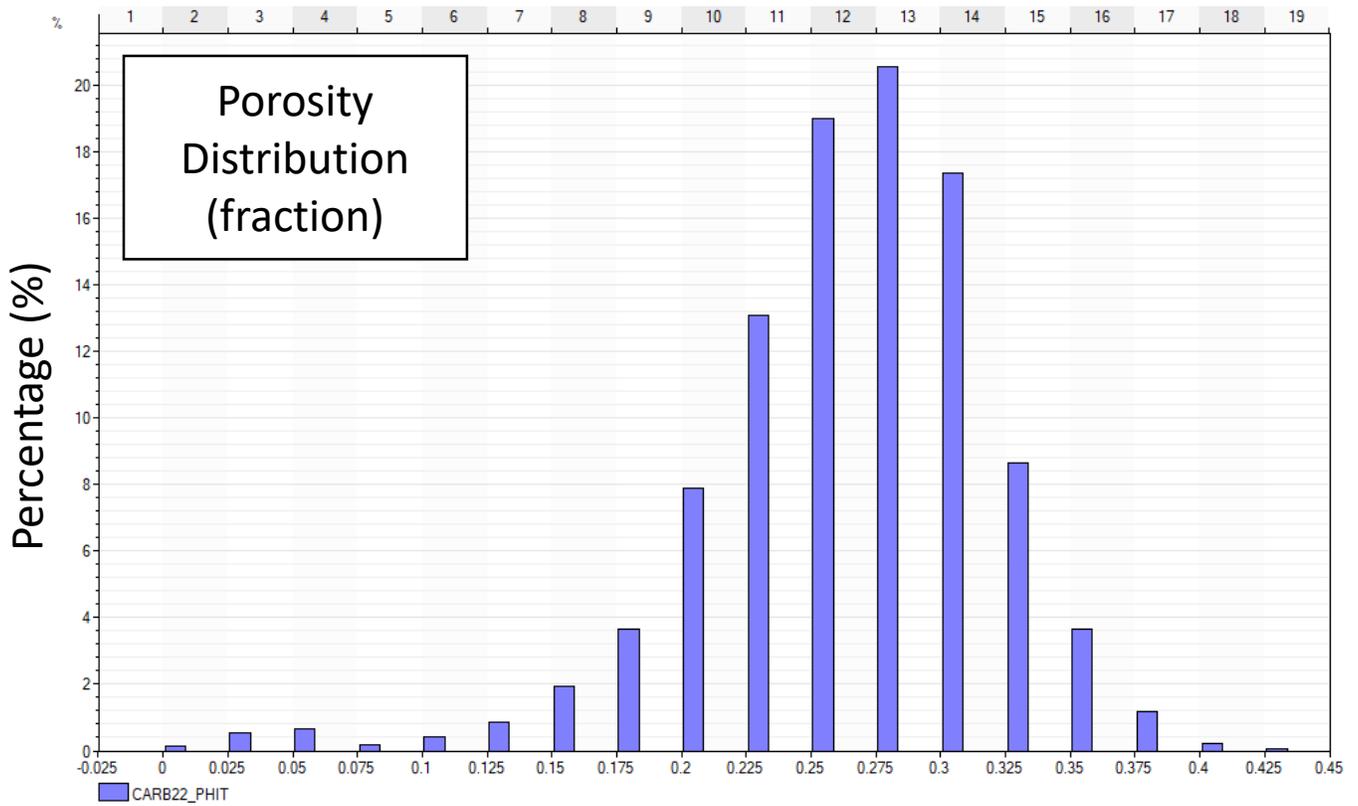


Figure 3.8. [redacted] porosity and permeability distribution in the static model.

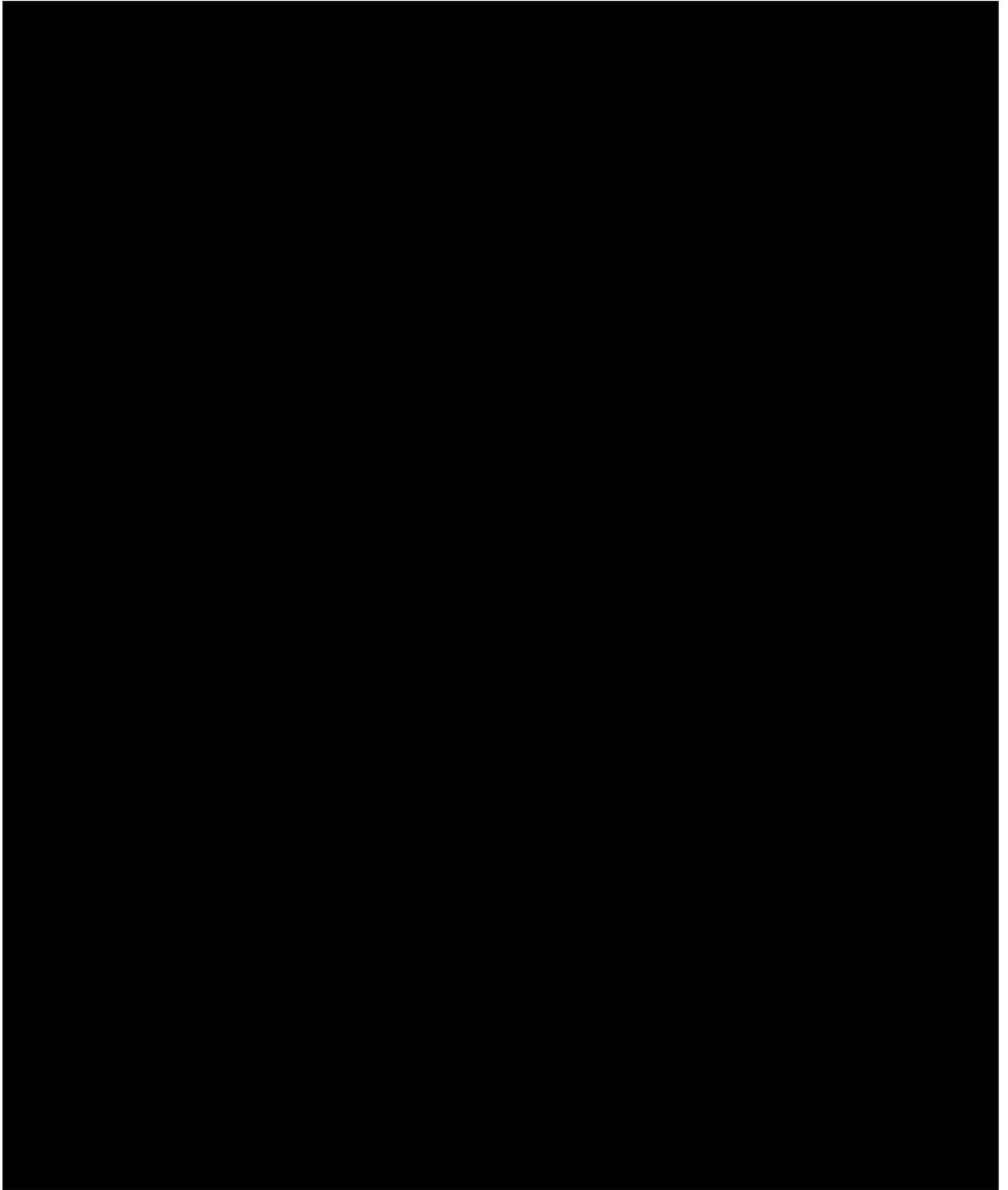


Figure 3.9. Sections through the static grid showing the distribution of porosity and permeability in the reservoir.

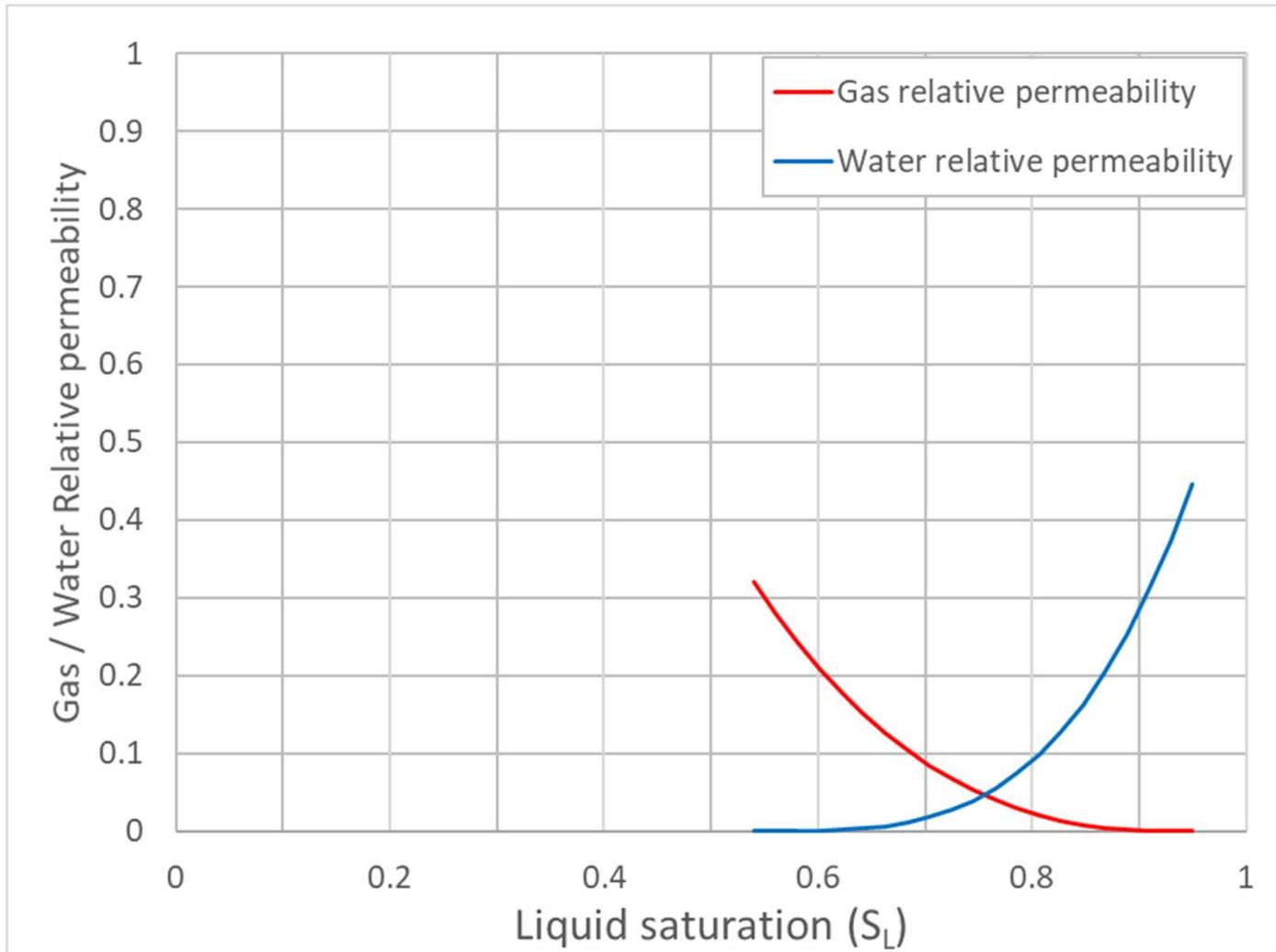


Figure 3.10: Relative permeability curves for Gas-Water system

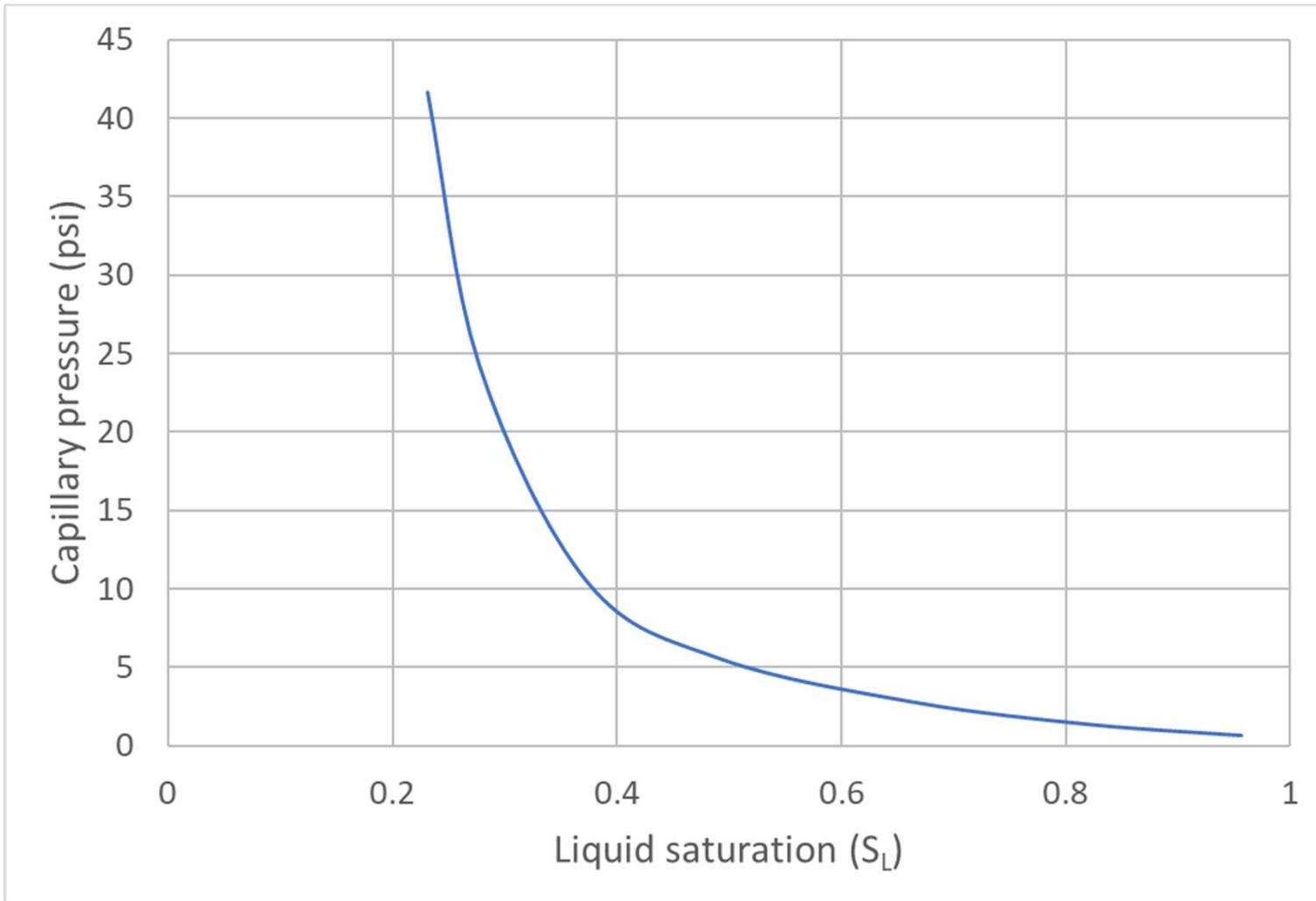
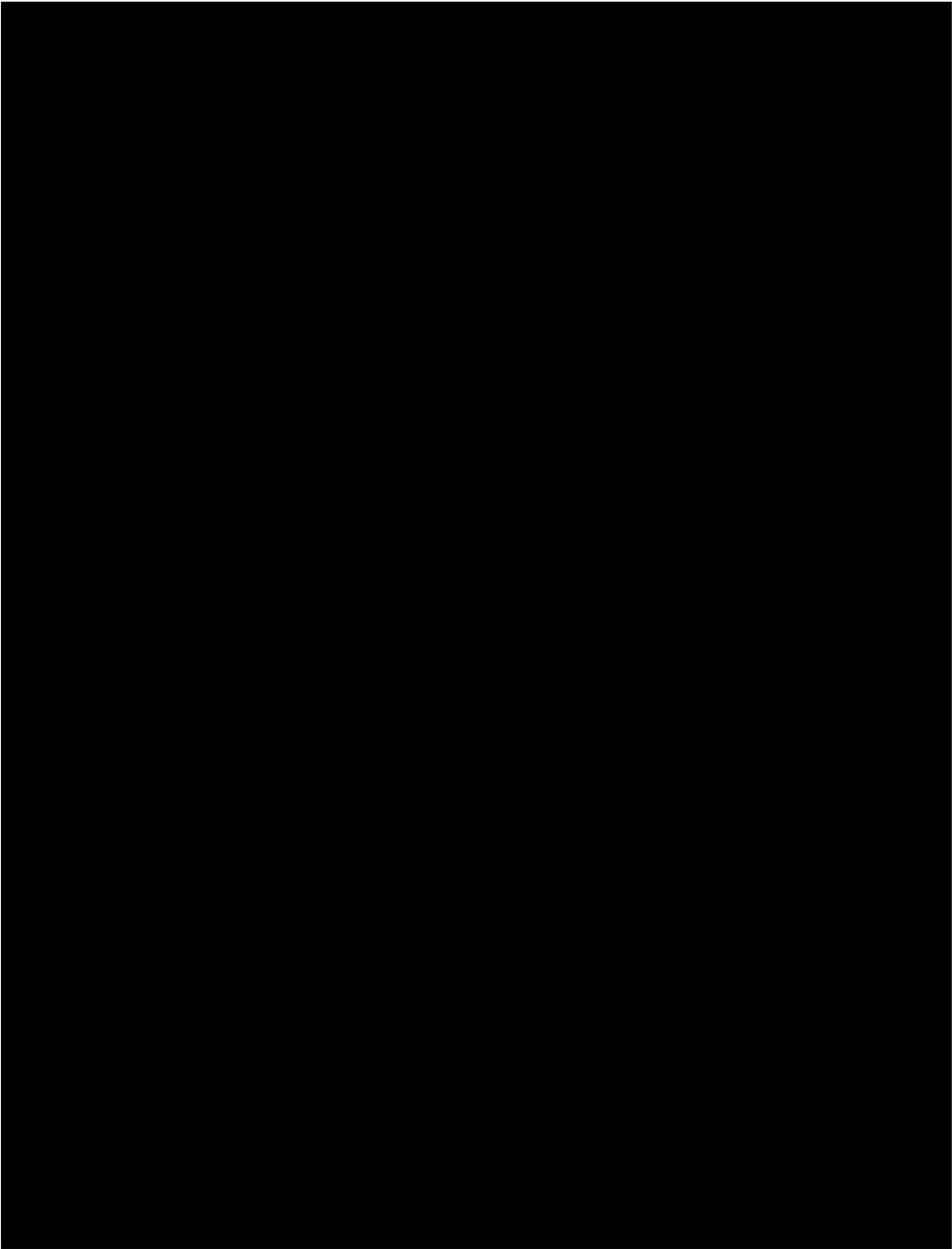


Figure 3.11: Capillary pressure curve



[Redacted text]

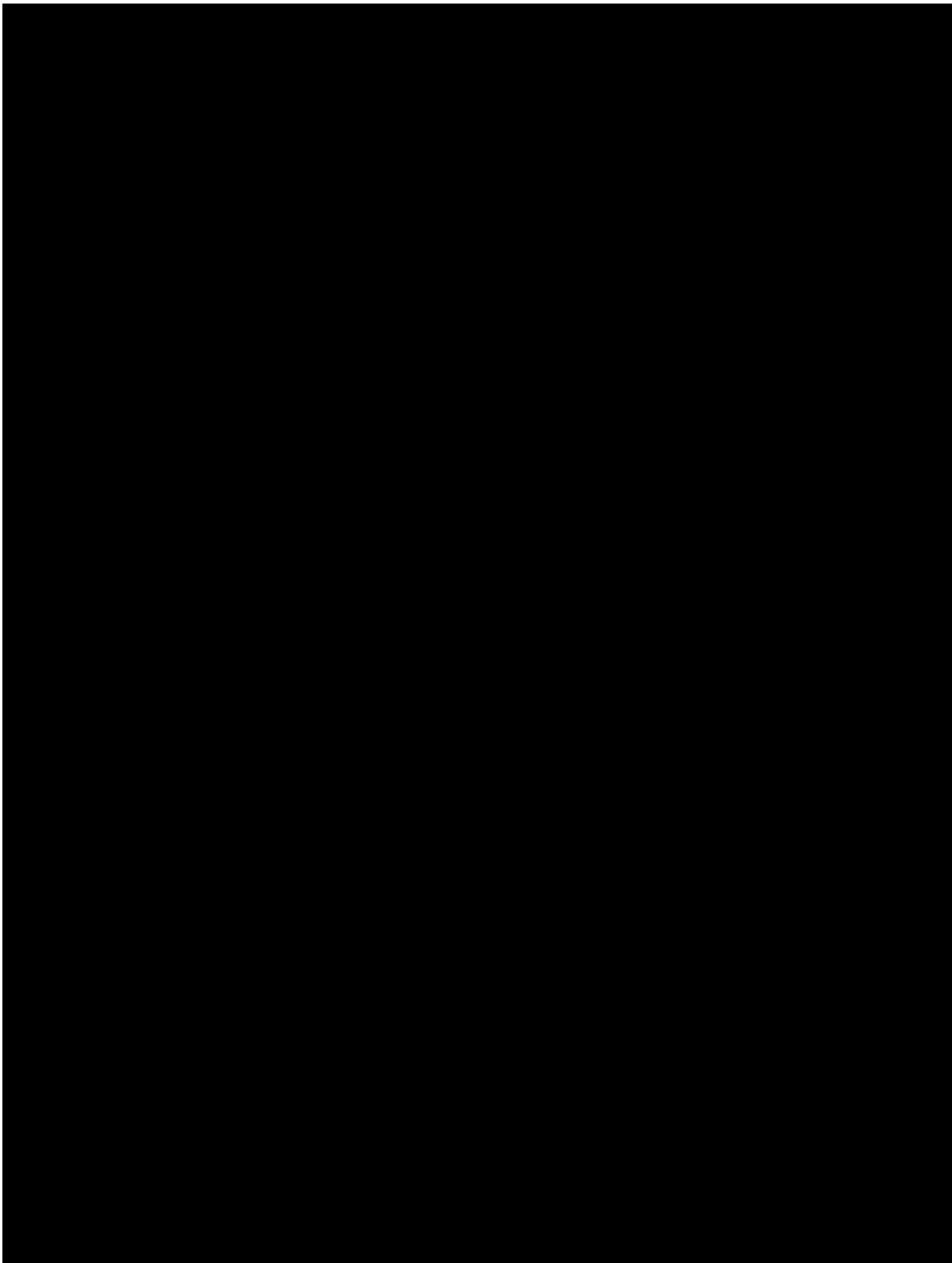
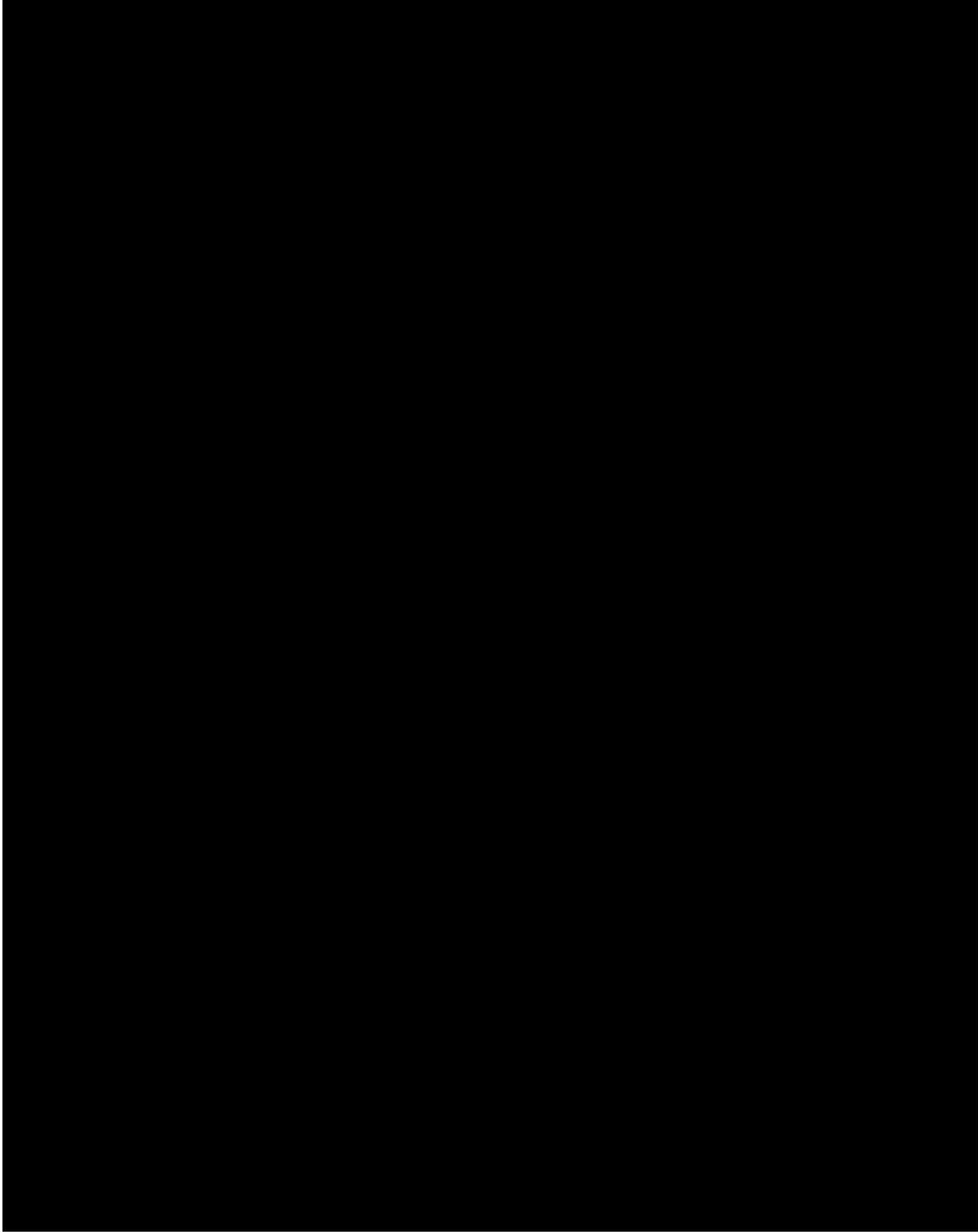




Figure 3.14: CO₂ storage mechanisms in the reservoir

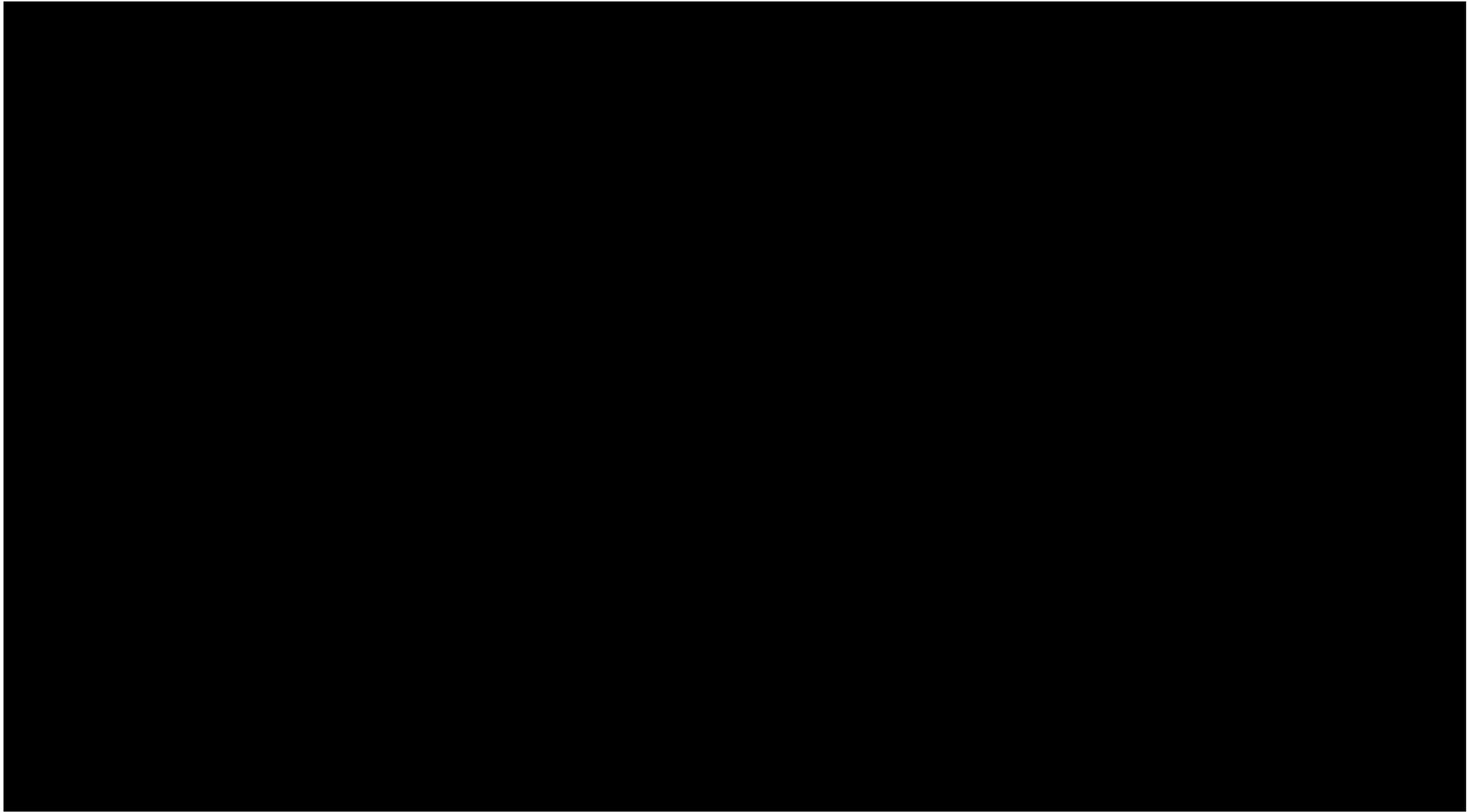




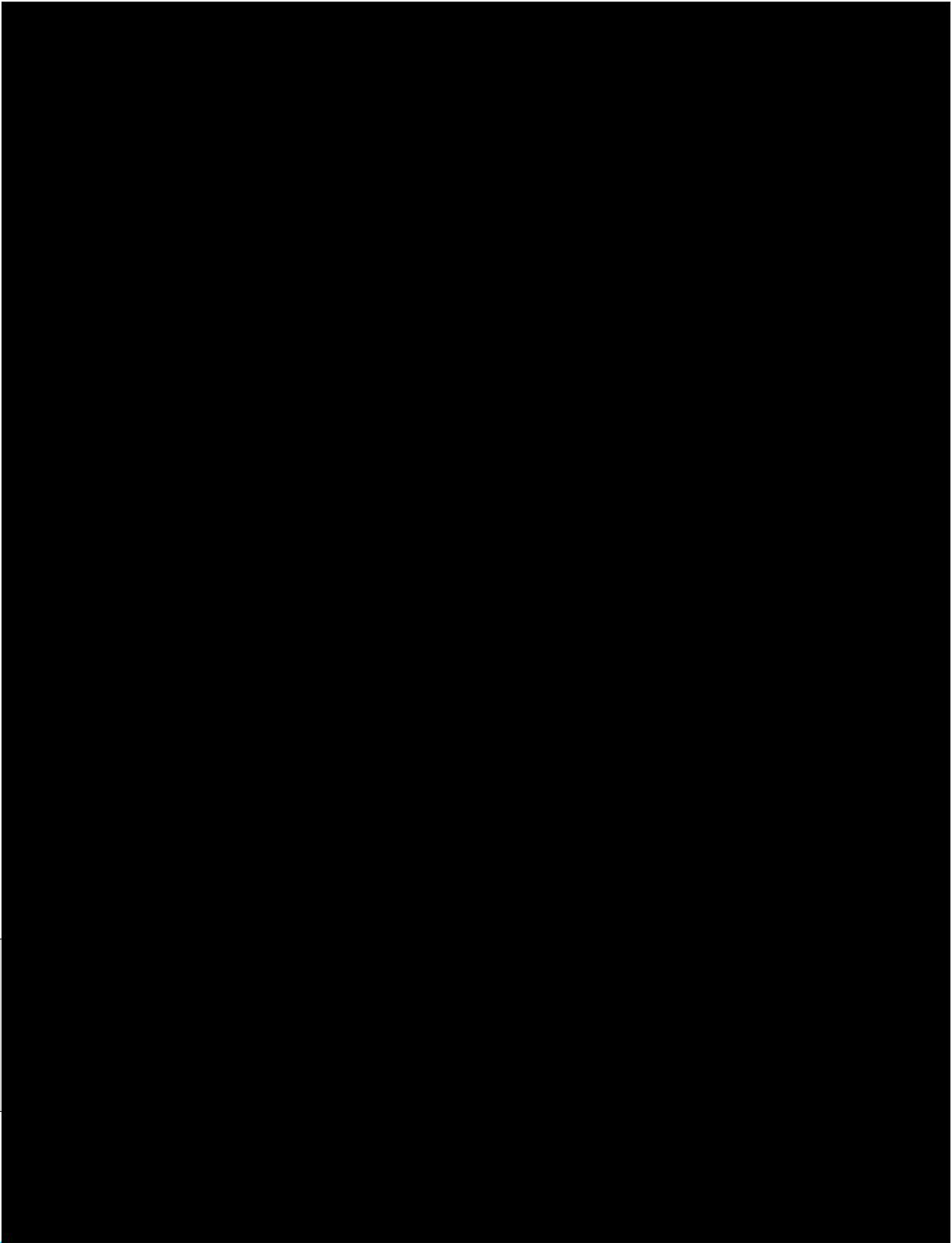
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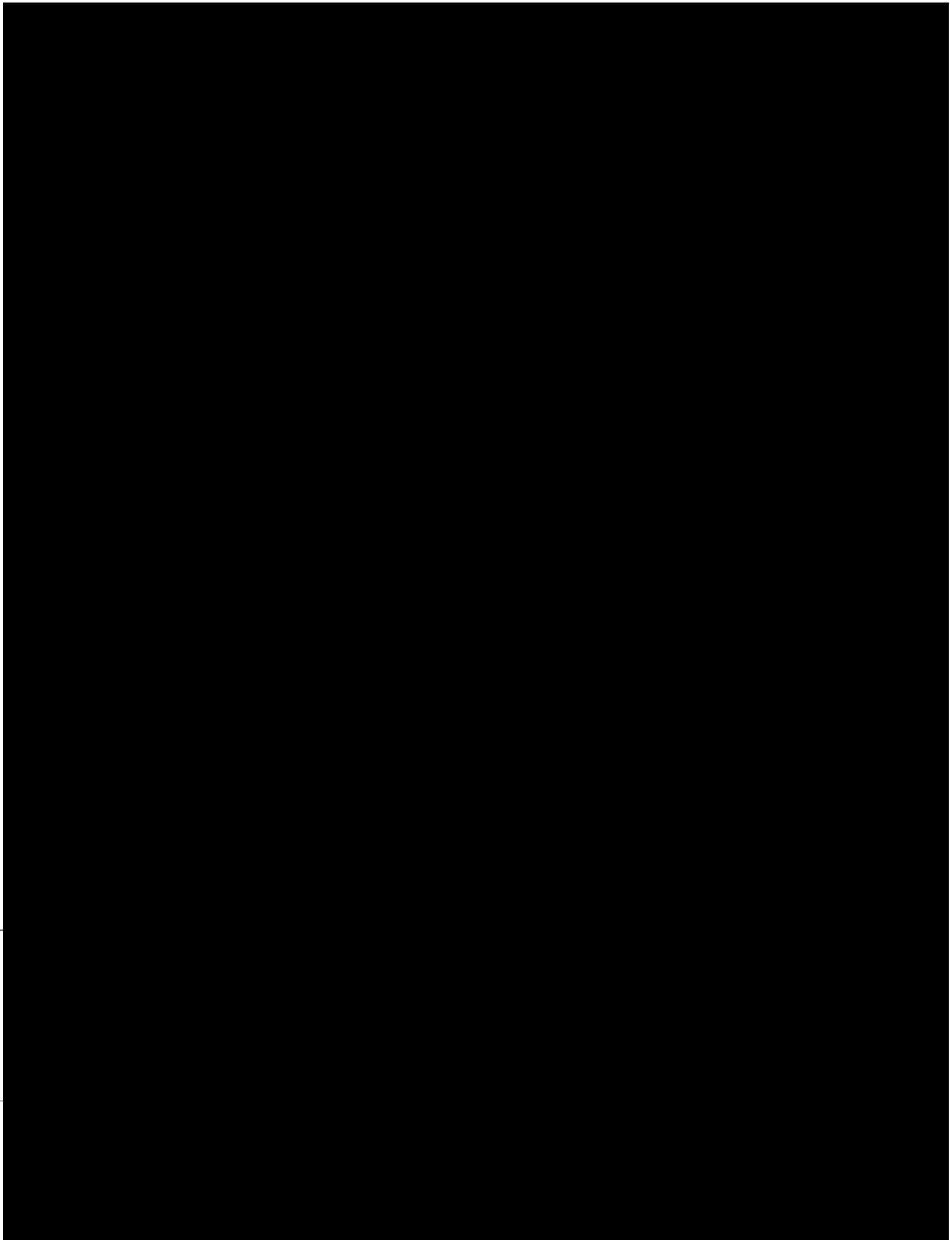
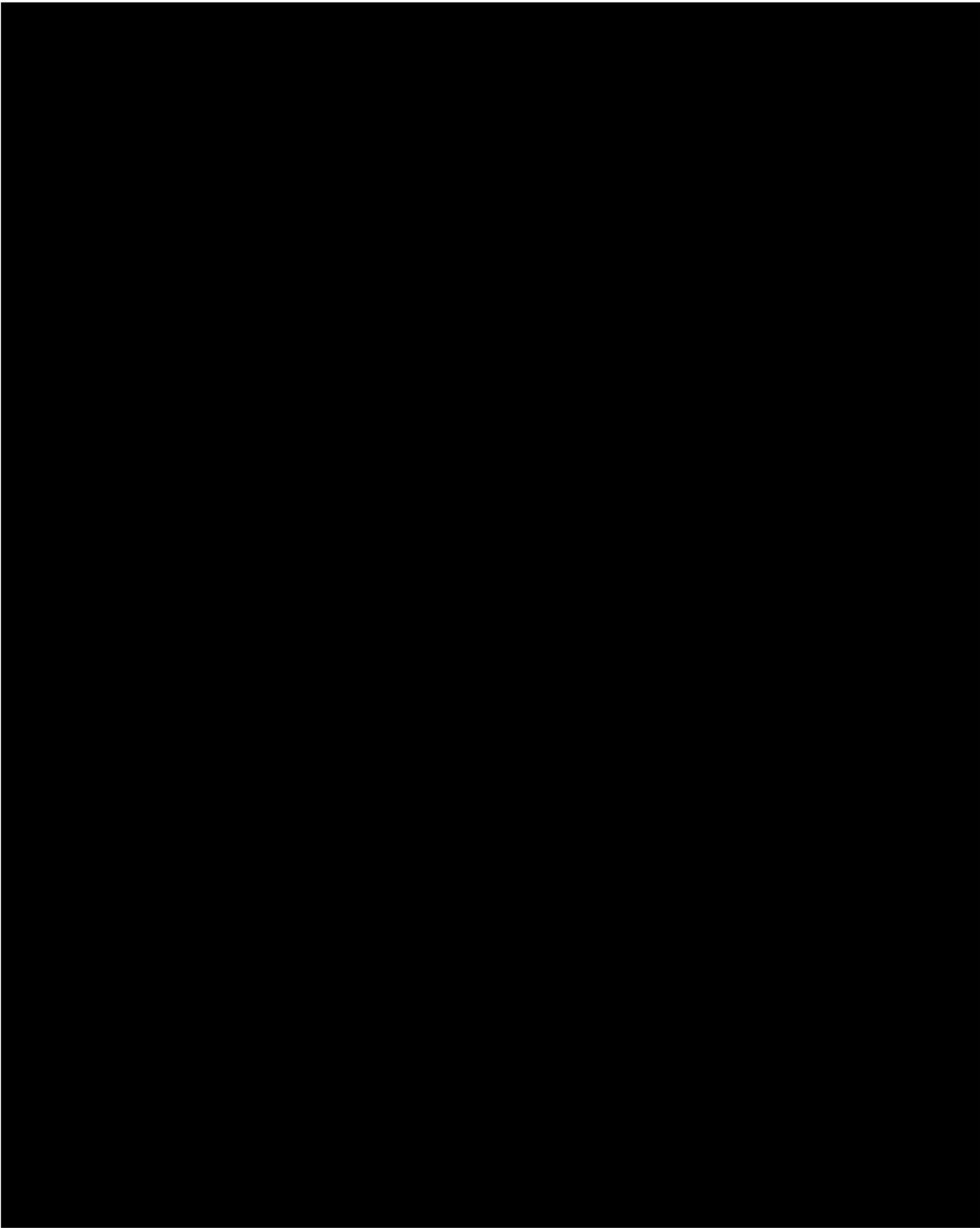


Figure 3.19. Map showing the location of injection wells and monitoring wells.



[Redacted text]

AREA OF REVIEW AND CORRECTIVE ACTION PLAN - TABLES

Table 3.1. Model domain information.

| | | | |
|--------------------------------------|-------------------------------|-----------------------------------|----------|
| Coordinate System | State Plane | | |
| HorizontalDatum | North American Datum (NAD) 27 | | |
| Coordinate System Units | Feet | | |
| Zone | Zone 2 | | |
| FIPZONE | 0402 | ADSZONE | 3301 |
| Coordinate of X min | ████████ | Coordinate of X max | ████████ |
| Coordinate of Y min | ████████ | Coordinate of Y max | ████████ |
| Elevation of bottom of domain | ████████ | Elevation of top of domain | ████████ |

Table 3.2. Initial conditions.

| Parameter | Value or Range | Units | Corresponding Elevation (ft MSL) | Data Source |
|--------------------|-----------------------|------------------------|---|--|
| Temperature | 151 | Fahrenheit | 6900 | Bottom hole temperature data from logs in the area |
| Formation pressure | 2860 | Pounds per square inch | 6900 | [REDACTED] |
| Salinity | 15,500 | Parts per million | 6900 | Water analysis and Log calculated salinity curves |

Table 3.4. Injection pressure details.

| Injection Pressure Details | Injection Well C1 | Injection Well C2 | Injection Well E1 | Injection Well E2 | Injection Well W1 | Injection Well W2 |
|---|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| Fracture gradient (psi/ft) | 0.76 | 0.76 | 0.76 | 0.76 | 0.76 | 0.76 |
| Maximum allowable injection pressure (90% of fracture pressure) (psi) | 4224 | 4919 | 4111 | 4774 | 4207 | 4802 |
| Elevation corresponding to maximum injection pressure (ft TVD) | 6178 | 7192 | 6011 | 6984 | 6155 | 7020 |
| Elevation at the top of the perforated interval (ft TVD) | 6178 | 7192 | 6011 | 6984 | 6155 | 7020 |
| Calculated maximum injection pressure at the top of the perforated interval (psi) | 4224 | 4919 | 4111 | 4774 | 4207 | 4802 |
| Planned injection pressure (psi) / gradient (psi/ft) at top of perforations | 3050 / 0.494 | 3566 / 0.496 | 2901 / 0.483 | 3363 / 0.482 | 2961 / 0.481 | 3504 / 0.499 |

Table 3.5. Simulation sensitivity scenarios

| Scenario | CO2 plume & AoR impact |
|--|-----------------------------------|
| Porosity: 10% reduction from base case | Minimal Impact |
| Porosity: 10% increase from base case | Minimal Impact |
| Permeability: 10% reduction from base case | Minimal Impact |
| Permeability: 10% increase from base case | Minimal Impact |

Table 3.6: Wellbores in the AoR by Status

| Status | Count |
|-----------------------|--------------|
| Active | 0 |
| Idle | 0 |
| Plugged and Abandoned | 46 |
| Total | 46 |