

**ATTACHMENT G1 - G7: INJECTOR CONSTRUCTION AND PLUGGING PLANS**

**40 CFR 146.86, 146.92**

**CTV VI**

**ATTACHMENT G1: INJECTOR CTVW-I-DO1  
CONSTRUCTION AND PLUGGING PLAN  
40 CFR 146.86, 146.92  
CTV VI**

**Document Version History**

Version	Revision Date	File Name	Description of Change
1	7/31/2024	CP_CTVW-I-DO1	Original Submission
2	11/21/2025	Att G2 - CP - Inj - CTVW-I-DO1_v2	Response to EPA comments received August 21, 2025

**1. Facility Information**

Facility Name: CTV VI

Facility Contact: Faisal Latif, Storage Development Manager  
(661) 763-6274, faisal.latif@crc.com

Well Location: 36.80749903, -120.5133076

**2. Introduction**

Carbon Terra Vault Holdings, LLC (CTV) intends to drill seven new carbon dioxide (CO<sub>2</sub>) injection wells for CO<sub>2</sub> injection for the CTV VI storage project. **Figure G-1** identifies the wells proposed for the project.

All planned new wells will be constructed with components that are compatible with the injectate and formation fluids encountered such that corrosion rates and cumulative corrosion over the duration of the project are acceptable. The proposed well materials will be confirmed based on actual CO<sub>2</sub> composition such that material strength is sufficient to withstand all loads encountered throughout the life of the well with an acceptable safety factor incorporated into the design. Casing points will be verified by trained geologists using real-time drilling data such as logging while drilling (LWD) and mud logs to ensure protection of shallow formations. Due to the depth of the base of lowermost underground source of drinking water (USDW), a dedicated casing string will be used to isolate and protect the USDW. Cementing design, additives, and placement procedures will be sufficient to ensure isolation of the Injection Zone and protection of shallow formations using cementing materials that are compatible with injectate, formation fluids, and subsurface pressure and temperature conditions.

**Appendix 5: Injection and Monitoring Well Schematics (Appendix 5)** provides casing diagram figures for all injection and monitoring wells with construction specifications and anticipated completion details in graphical and/or tabular format.

### 3. Construction Details

#### 3.1 *Injectate Migration Prevention and Protection of the USDW*

New well construction will occur during the pre-operational testing phase, and no abnormal drilling and completion challenges are anticipated. The drilling histories of nearby wells provide key information to drilling professionals and identify the expected conditions to be encountered. The wells will be constructed with objectives to achieve target CO<sub>2</sub> injection rates, to prevent migration of fluids out of the injection zones, to protect USDWs and the shallow formations, and to allow for monitoring, as described by the following:

- Well designs will be sufficient to withstand all anticipated load cases including safety factors.
- Multiple cemented casing strings will protect shallow USDW-bearing zones from contacting injection fluid within the production tubing.
- All casing strings will be cemented in place using industry-proven recommended practices for slurry design and placement. The surface casing will be cemented with cement returns to surface. The intermediate and long-string casing will be cemented with a theoretical volume to surface.
- Cement bond logging (CBL) will be used to verify presence of cement in the production casing annulus through and above the confining layer.
- Mechanical integrity testing (MIT) will be performed on the tubing and the tubing/casing annulus.
- Upper completion design (injection tubulars, packer, and wellhead) enables monitoring devices to be installed downhole, cased hole logs to be acquired, samples to be obtained, and MIT to be conducted.
- Standard annular pressure tests (SAPTs) demonstrate that the long string casing, tubing, packer and wellhead have mechanical integrity. Internal MIT will be performed before the start of injection and any time the packer is reset to demonstrate isolation and integrity of primary barriers (tubing, packer, wellhead) and secondary barriers (casing, wellhead) for the protection of potential USDW.
- Real-time surface monitoring equipment with remote connectivity to a centralized facility and alarms provides continual awareness to potential anomalous injection conditions.
- Annular fluid (packer fluid) density and additives to mitigate corrosion provide additional protection against mechanical or chemical failure of production casing and upper completion equipment.

The injection well will be constructed using industry standards and recommended practices. Existing and future well materials comply with the following specifications:

- API Spec 5CT / ISO 11960 – Specifications for Casing and Tubing
- API Spec 5CRA / ISO 13680 – Specification for Corrosion-Resistant Alloy Seamless Tubes for use as Casing, Tubing, and Coupling Stock

- API Spec 10A / ISO 10426-1 – Cements and Materials for Cementing
- API Spec 11D1 / ISO 14310 – Downhole Equipment – Packers and Bridge Plugs
- API Spec 6A / ISO 10423 – Specification for Wellhead and Tree Equipment

### 3.2 *Materials*

Well materials used will be compatible with the CO<sub>2</sub> injectate to prevent the loss of mechanical integrity in the well:

- Tubing: Corrosion-resistant alloy (CRA) consistent with accepted industry practices for corrosion mitigation based on a mixture of formation fluids and injectates.
- Wellhead: Stainless steel or other material consistent with accepted industry practices for corrosion mitigation based on injected CO<sub>2</sub> specification.
- Packer: CRA or coating and hardened rubber elastomer element material.
- Casing: Standard N-80 casing will be installed to be compatible with the CO<sub>2</sub> injectate and verified through corrosion coupon monitoring as discussed in **Attachment C: Testing and Monitoring Plan (Attachment C)**.
- Cement: Portland cement has been used extensively in enhanced oil recovery (EOR) producers for decades. Data acquired from existing wells supports that the cement is compatible with CO<sub>2</sub> where good cement bond between formation and casing exists.

### 3.3 *Casing*

The Injection Zone is neither significantly depleted nor over pressured, and formation temperature ranges from 135 to 192°F, from the shallowest (Domengine) to the deepest (Tracy) formations that make up the Injection Zone. These conditions are not extreme, and normal cementing and casing practices meet standards. Temperature differences between the CO<sub>2</sub> injectate and reservoir will not affect well integrity. Logging data to assess casing corrosion to be collected during pre-operational testing will be used to ensure the condition of the casing will withstand the operational load associated with maintaining annular fluid and pressure.

The casing specifications in **Table G1-1** are sufficient to meet the requirements of 40 CFR 146.86(b)(1)(iv) and to allow for the safe operation at expected bottom-hole monitoring conditions.

As shown in **Figure G-2**, recent subsidence data demonstrate no appreciable subsidence in the Area of Review (AoR). Therefore, subsidence does not pose a risk to well integrity within the storage project.

### 3.4 *Cement*

Class G Portland cement will be used to cement the well. This cement is widely used in CO<sub>2</sub>-EOR wells and has been demonstrated to have properties that are not deleterious with CO<sub>2</sub>. The cement returns will be to surface for the surface casing. The intermediate casing string will also

be cemented to surface. The long-string casing string will be cemented in place with Class G Portland cement to surface. Subsequently, a CBL will be run to confirm annular isolation throughout and above the injection and confining formations (Section 6).

Cement will be placed using practices standard to the oil and gas industry. A bottom plug will be released ahead of the cement to separate drilling fluid from the cement slurry. The cement will then be pumped down the casing, circulated around the casing shoe and up the annulus toward surface. A top plug will be dropped and displaced with water until the plug bumps at the shoe, confirming full displacement of the cement. This method ensures uniform cement placement and effective zonal isolation. Class G Portland cement will be used, with additives adjusted as needed to achieve the desired density and setting characteristics.

### **3.5     *Tubing and Packer***

The information in **Appendix 5** is representative of completion equipment that will be used and meets the requirements at 40 CFR 146.86(c). Tubing and packer selection and specifications may be modified during pre-operational testing.

**Table G1-2** provides injection tubing specifications as the well will be configured at the time of injection and supports the requirements of 40 CFR 146.86(c). A suitable CRA will be selected and installed once the CO<sub>2</sub> stream impurities and impurity concentrations have been determined. The packer setting depth refers to the center of the element.

### **3.6     *Annular Fluid***

A 4 percent potassium chloride (KCl) completion fluid treated with corrosion inhibitor and biocide will be circulated in the tubing/casing annulus at the time of tubing installation. The corrosion inhibitor and biocide additives will be compatible with the wellbore environment and bottom-hole temperatures to prevent internal corrosion of the long-string casing and external corrosion of the tubing.

### **3.7     *Injectate and Formation Fluid Properties***

Details about the proposed injectate composition and properties can be found in Section 7.2 of **Attachment A: Narrative Report (Attachment A)**. Similarly, the formation fluid composition and properties can be found in Section 2.8.2 of **Attachment A**.

The anticipated injection temperature at the wellhead is 90 to 130°F.

No corrosion is expected in the absence of free-phase water provided that the entrained water is kept in solution with the CO<sub>2</sub>. This is ensured by a <25 lb/mmscf injectate specification limit, and this specification will be a condition of custody transfer at the capture facility. For transport through pipelines, which typically use standard alloy pipeline materials, this specification is critical to the mechanical integrity of the pipeline network, and out of specification product will be immediately rejected. Therefore, all product transported through pipeline to the injection wellhead is expected to be dry-phase CO<sub>2</sub> with no free-phase water present.

Injectate water solubility will vary with depth and time as temperature and pressures change. The water specification is conservative to ensure water solubility across supercritical operating ranges. CRA tubing will be used in the injection wells to mitigate any potential corrosion impact should free-phase water from the reservoir become present in the wellbore, such as during shut-in events when formation liquids, if present, could backflow into the wellbore. CTV may further optimize the maximum water content specification prior to injection based on technical analysis.

Injectate and formation water analysis will be performed during pre-operational testing and reviewed to ensure compatibility with well construction materials.

### **3.8 Alarms and Shut-off Devices**

As described in **Attachment C**, injection wells will be configured with real-time injection rate, injection pressure, and annular pressure monitoring and alarms. **Appendix 4: Operating Procedures (Appendix 4)** details the maximum injection rate and pressure thresholds for alarms and shut-off devices.

A surface shut-off valve will be installed on the wellhead and configured with automation and communication to the Central Control Facility (CCF). The valve will be used by the CCF operator remotely to respond to an emergency by shutting in the well. The valve will be configured to automatically shut-in the well if tubing or annular alarm thresholds are exceeded.

The EPA Preamble to the Class VI Rule states (Federal Register Vol.75, No.237, p.77258): “EPA believes that requiring automatic surface shut-off devices instead of down-hole devices provides more flexibility to owners or operators when performing required mechanical integrity tests. Additionally, this requirement addresses concerns about risks associated with routine well workovers that may be complicated by the presence of down-hole devices while still maintaining USDW protection.” For these reasons, CTV will design the injection well with a surface shut-off valve at the wellhead and not a downhole device.

## **4. Pre-Operational Logging and Testing**

The tests and logs listed in **Table G1-3** will be conducted in accordance with the testing required under 40 CFR 146.87. The methods are described in **Attachment C**. **Table G1-3** summarizes the pre-injection logging data and tests that CTV will acquire during the pre-operational testing and construction phase.

CTV will notify EPA at least 30 days prior to conducting mechanical integrity and formation tests and provide a detailed description of the testing procedure. Notice and the opportunity to witness these tests/logs shall be provided to EPA at least 48 hours in advance of a given test/log.

## **5. Well Operations**

Injection operation conditions are detailed in **Appendix 4**.

## **6. Injection Well Plugging Plan**

CTV will conduct injection well plugging and abandonment according to the procedures below.

### **6.1 *Planned Tests or Measures to Determine Bottom-Hole Reservoir Pressure***

Before beginning the plugging and abandonment process, the pressure used to squeeze the cement will be determined from the bottom-hole pressure gauge. During plugging operations, the weighted cement slurry displacement fluids will be overbalanced to the reservoir pressure ensuring that no reservoir fluids will be able to enter the wellbore during cementing operations.

### **6.2 *Planned External Mechanical Integrity Test(s)***

CTV will conduct at least one external MIT prior to plugging the injection well as required by 40 CFR 146.92(a). A temperature log will be run over the entire depth of each sequestration well (**Table G1-4**). Data from the logging runs will be evaluated for anomalies in the temperature curve, which would be indicative of fluid migration out of the Injection Zone. Data will be compared to the data from temperature logs performed prior to injection of CO<sub>2</sub>. Deviations between the temperature log performed before, after, and during injection may indicate issues related to the integrity of the well casing or cement.

### **6.3 *Information on Plugs***

CTV will use the materials and methods noted in **Table G1-5** to plug the injection well. The cement formulation and required certification documents will be submitted to the agency with the well plugging plan. The owner or operator will report the wet density and will retain duplicate samples of the cement used for each plug.

A standard Portland cement blend with specifications consistent with API Spec 10A will be designed with a minimum 1,000 pounds per square inch (psi) compressive strength and a maximum liquid permeability of 0.1 millidarcies (mD). The properties of this cement blend will be at least equivalent to the properties of Class G Portland cement, and the cement plug will provide an effective, long-term barrier to prevent migration of CO<sub>2</sub> into and within the wellbore. This cement is widely used in CO<sub>2</sub>-EOR wells and has been demonstrated to have properties that are not deleterious with CO<sub>2</sub>.

The wells will have this cement placed as detailed in **Table G1-5**, and all portions of the wellbore that are not plugged with cement will be filled with sufficiently weighted abandonment mud. The cement will be set in plug segments per CTV's standard procedures.

### **6.4 *Notifications, Permits, and Inspections***

In compliance with 40 CFR 146.92(c), CTV will notify the regulatory agency at least 60 days before plugging the well and provide an updated Injection Well Plugging Plan, if applicable.

## 6.5 *Plugging Procedures*

The following plugging procedures are planned assuming a coiled tubing unit (CTU) is used for cement plug placement after all completion equipment is removed. The placement method may vary depending on the type of service equipment used. For instance, a maintenance rig may place the cement plug of same specification at same depths using jointed pipe and achieve the same result.

1. Bottom-hole pressure from downhole pressure gauge is recorded and kill fluid density is calculated.
2. Kill fluid of appropriate density is bullheaded into the wellbore to prevent reservoir fluid inflow and acts as a buffer fluid to flush the wellbore. After at least one wellbore volume of fluid is pumped, the well is observed to ensure static conditions, which is an indication that (1) the weighted fluid is preventing fluid migration into the wellbore and (2) there is no CO<sub>2</sub> in the wellbore. If CO<sub>2</sub> were present in the wellbore, it would migrate to surface due to density difference and expand in volume under decreasing hydrostatic pressure, resulting in non-static (flowing) conditions at surface.
3. Tubulars and downhole equipment are removed from the casing, and the well is cleaned out to total depth during rig operations. Subsequent operations are carried out using a CTU.
4. The CTU runs in the hole to total depth and begins placing cement in the casing. The coiled tubing is kept about 100 feet inside of the cement plug and is pulled uphole while cementing operations continue.
5. Once the full plug is placed, the coiled tubing is pulled above the plug and the well is circulated to ensure the depth of the top of the plug. The tubing is then pulled uphole while operations are paused to wait on cement.
6. Once the cement has set, the coiled tubing is run back in the hole to witness the depth and hardness of the plug before initiating the next cemented plug interval.
7. Abandonment mud is placed between cement plugs while pulling the coiled tubing uphole to the base of the next plug.
8. This process, beginning with step 4, is repeated for each cement plug until cement is placed to surface.

CRC follows the following standards for plugging operations:

- Bottom-hole plug: All perforations shall be plugged with cement, and the plug shall extend at least 100 feet above the top of a landed liner, the uppermost perforations, the casing cementing point, the water shut-off holes, or the oil or gas zone, whichever is highest.
- Base of USDW plug (USDW is defined as a non-exempt aquifer that has <10,000 milligrams per liter [mg/L] total dissolved solids [TDS]):
  - ◊ If there is cement behind the casing across the base of USDW, a 100-foot cement plug shall be placed inside the casing across the interface.



- ◇ If the top of the cement behind the casing is below the base of the USDW, squeeze-cementing shall be required through perforations to protect the freshwater deposits. In addition, a 100-foot cement plug shall be placed inside the casing across the fresh-saltwater interface.
- Surface plug: The casing and all annuli shall be plugged at the surface with at least a 25-foot cement plug.

**Table G1-1. Casing Details**

Name	Depth Interval (feet)	Outside Diameter (inches)	Inside Diameter (inches)	Weight (lb/ft)	Grade (API)	Design Coupling (Short or Long Threaded)	Thermal Conductivity @ 77°F (BTU/ft hr, °F)	Burst Strength (psi)	Collapse Strength (psi)	Tensile Strength (psi)
Conductor	14–54	20	19.124	94	—	—	2.62	—	—	—
Surface	14–800	13.375	12.615	54.5	K-55	Short	2.62	2,730	1,130	853,240
Intermediate	14–3,924	9.625	8.755	43.5	N-80	Long	2.62	6,330	3,810	1,065,350
Long-string	14–4,312 4,312–5,986	7	6.276	26	L-80 L-80 CRA	Long	2.62	7,240	5,410	603,930

Note: Burst pressure is the same as internal pressure, collapse pressure is the same as external pressure, and tensile strength is the same as axial loading.

**Table G1-2. Tubing and Packer Details**

Components	Setting Depth Interval (feet)	Tensile Strength/Rating (lb)	Burst Strength/Rating (psi)	Collapse Strength/Rating (psi)	Material (e.g., weight/grade/connection)
4-inch tubing	4,676	246,140	9,170	8,800	11 lb/ft, L-80 CRA, Premium
Permanent sealbore packer	4,646	200,000	7,500	7,500	26-32 lb/ft, CRA

**Table G1-3. Summary of Pre-Operational Logging and Testing**

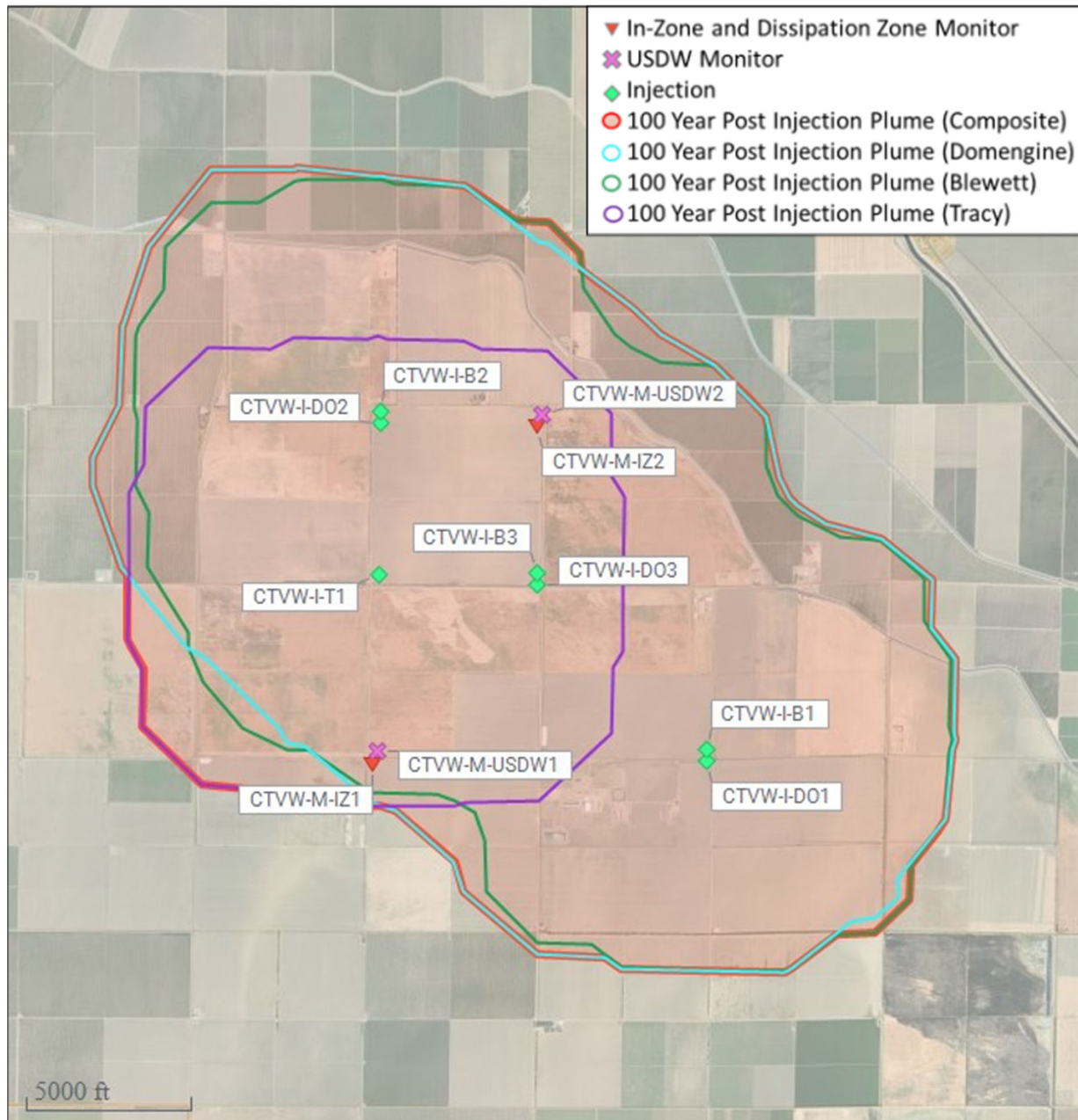
Data Collection Location(s)	Logging or Testing Activity	Spatial Coverage or Depth
CTVW-I-DO1	Deviation checks	Every 120 feet during drilling operations
	Dual Induction Laterolog	During drilling operations
	Spontaneous Potential	During drilling operations
	Gamma Ray	During drilling operations
	Caliper	During drilling operations
	Compensated Neutron	During drilling operations
	Formation Density	During drilling operations
	Mud Log	During drilling operations
	Cement Bond Log	Along all casing strings to surface
	Casing Inspection Log	Along the long-string casing to surface
	Internal MIT: SAPT	Casing/tubing annulus above packer
	External MIT (at least one of): Oxygen Activation Log Noise Log	Along the long-string casing to surface
	Injectivity Test	Injection Zone
	Pressure Fall-off Testing	Injection Zone

**Table G1-4. Planned MITs**

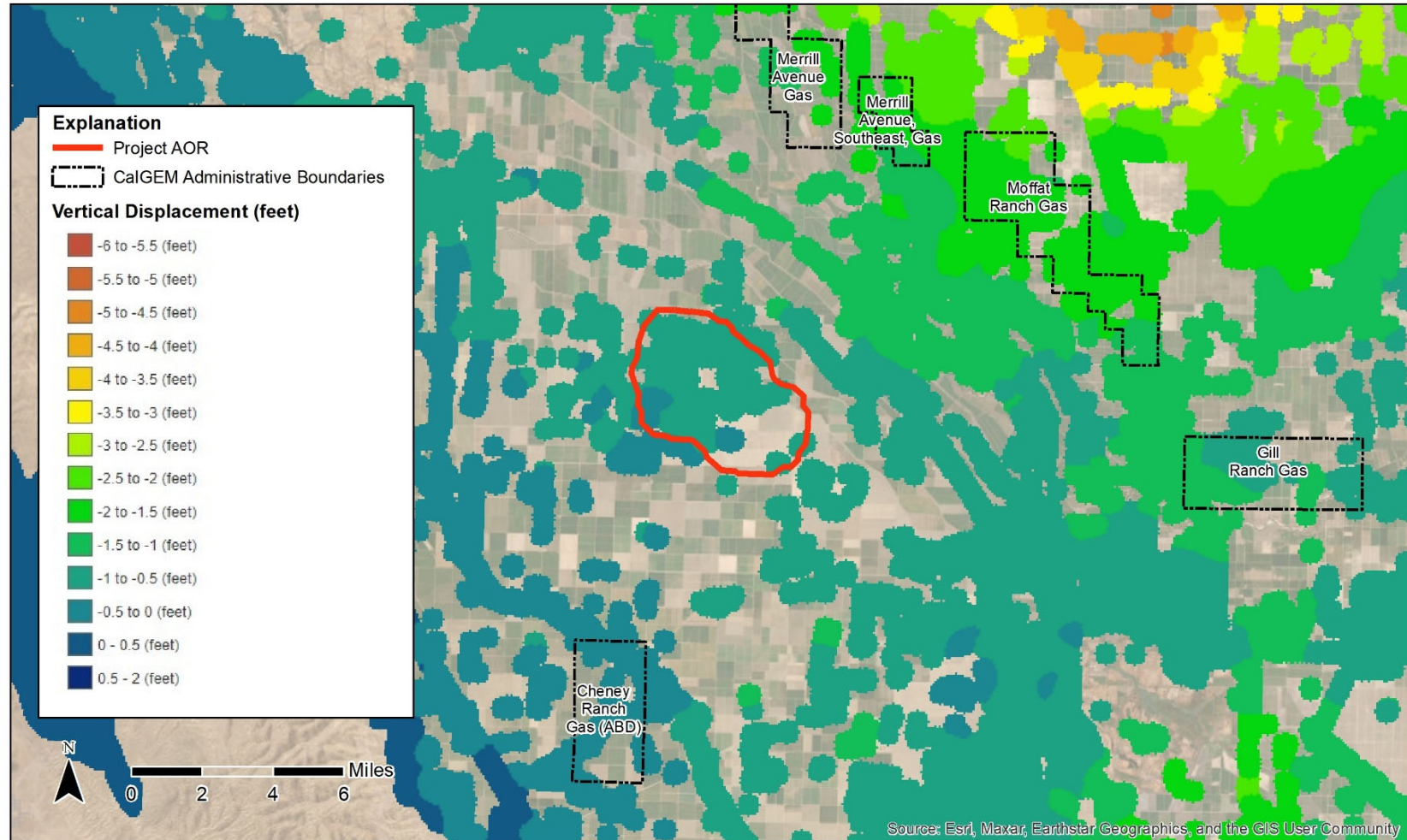
Test Description	Location
Temperature	Entire length of the sequestration well

**Table G1-5. Plugging Details**

Plug Information	Plug #1	Plug #2	Plug #3	Plug #4
Diameter of boring in which plug will be placed (inches)	6.276	6.276	6.276	6.276
Depth to bottom of tubing or drill pipe (feet)	5,892	3,975	3,850	39
Sacks of cement to be used (each plug)	239	23	23	10
Slurry volume to be pumped (bbl)	48.95	4.71	4.71	2.05
Slurry weight (lb/gal)	15.8	15.8	15.8	15.8
Calculated top of plug (feet)	4,612	3,850	3,725	14
Bottom of plug (feet)	5,892	3,975	3,850	39
Type of cement or other material	Class G	Class G	Class G	Class G
Method of emplacement (e.g., balance method, retainer method, or two-plug method)	Balanced Plug, Retainer, or CT Plug			



**Figure G-1. Locations of Injection Wells and Monitoring Wells.**



**Figure G-2. Subsidence in the Area of Review.** Subsidence is -1 to 0 feet for June 2015 to July 2022. Vertical displacement data for subsidence analysis are from the Sustainable Groundwater Management Act Data Viewer (<https://sgma.water.ca.gov/>).

**ATTACHMENT G2: INJECTOR CTVW-I-DO2  
CONSTRUCTION AND PLUGGING PLAN  
40 CFR 146.86, 146.92  
CTV VI**

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Version	Revision Date	File Name	Description of Change
1	7/31/2024	CP_CTVW-I-DO2	Original Submission
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- Real-time surface monitoring equipment with remote connectivity to a centralized facility and alarms provides continual awareness to potential anomalous injection conditions.
- Annular fluid (packer fluid) density and additives to mitigate corrosion provide additional protection against mechanical or chemical failure of production casing and upper completion equipment.

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- API Spec 5CRA / ISO 13680 – Specification for Corrosion-Resistant Alloy Seamless Tubes for use as Casing, Tubing, and Coupling Stock



- API Spec 10A / ISO 10426-1 – Cements and Materials for Cementing
- API Spec 11D1 / ISO 14310 – Downhole Equipment – Packers and Bridge Plugs
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The casing specifications in **Table G2-1** are sufficient to meet the requirements of 40 CFR 146.86(b)(1)(iv) and to allow for the safe operation at expected bottom-hole monitoring conditions.

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As described in **Attachment C**, injection wells will be configured with real-time injection rate, injection pressure, and annular pressure monitoring and alarms. **Appendix 4: Operating Procedures (Appendix 4)** details the maximum injection rate and pressure thresholds for alarms and shut-off devices.

A surface shut-off valve will be installed on the wellhead and configured with automation and communication to the Central Control Facility (CCF). The valve will be used by the CCF operator remotely to respond to an emergency by shutting in the well. The valve will be configured to automatically shut-in the well if tubing or annular alarm thresholds are exceeded.

The EPA Preamble to the Class VI Rule states (Federal Register Vol.75, No.237, p.77258): “EPA believes that requiring automatic surface shut-off devices instead of down-hole devices provides more flexibility to owners or operators when performing required mechanical integrity tests. Additionally, this requirement addresses concerns about risks associated with routine well workovers that may be complicated by the presence of down-hole devices while still maintaining USDW protection.” For these reasons, CTV will design the injection well with a surface shut-off valve at the wellhead and not a downhole device.

## **4. Pre-Operational Logging and Testing**

The tests and logs listed in **Table G2-3** will be conducted in accordance with the testing required under 40 CFR 146.87. The methods are described in **Attachment C**. **Table G2-3** summarizes the pre-injection logging data and tests that CTV will acquire during the pre-operational testing and construction phase.

CTV will notify EPA at least 30 days prior to conducting mechanical integrity and formation tests and provide a detailed description of the testing procedure. Notice and the opportunity to witness these tests/logs shall be provided to EPA at least 48 hours in advance of a given test/log.

## **5. Well Operations**

Injection operation conditions are detailed in **Appendix 4**.

## **6. Injection Well Plugging Plan**

CTV will conduct injection well plugging and abandonment according to the procedures below.

### **6.1 *Planned Tests or Measures to Determine Bottom-Hole Reservoir Pressure***

Before beginning the plugging and abandonment process, the pressure used to squeeze the cement will be determined from the bottom-hole pressure gauge. During plugging operations, the weighted cement slurry displacement fluids will be overbalanced to the reservoir pressure ensuring that no reservoir fluids will be able to enter the wellbore during cementing operations.

### **6.2 *Planned External Mechanical Integrity Test(s)***

CTV will conduct at least one external MIT prior to plugging the injection well as required by 40 CFR 146.92(a). A temperature log will be run over the entire depth of each sequestration well (**Table G2-4**). Data from the logging runs will be evaluated for anomalies in the temperature curve, which would be indicative of fluid migration out of the Injection Zone. Data will be compared to the data from temperature logs performed prior to injection of CO<sub>2</sub>. Deviations between the temperature log performed before, after, and during injection may indicate issues related to the integrity of the well casing or cement.

### **6.3 *Information on Plugs***

CTV will use the materials and methods noted in **Table G2-5** to plug the injection well. The cement formulation and required certification documents will be submitted to the agency with the well plugging plan. The owner or operator will report the wet density and will retain duplicate samples of the cement used for each plug.

A standard Portland cement blend with specifications consistent with API Spec 10A will be designed with a minimum 1,000 pounds per square inch (psi) compressive strength and a maximum liquid permeability of 0.1 millidarcies (mD). The properties of this cement blend will be at least equivalent to the properties of Class G Portland cement, and the cement plug will provide an effective, long-term barrier to prevent migration of CO<sub>2</sub> into and within the wellbore. This cement is widely used in CO<sub>2</sub>-EOR wells and has been demonstrated to have properties that are not deleterious with CO<sub>2</sub>.

The wells will have this cement placed as detailed in **Table G2-5**, and all portions of the wellbore that are not plugged with cement will be filled with sufficiently weighted abandonment mud. The cement will be set in plug segments per CTV's standard procedures.

### **6.4 *Notifications, Permits, and Inspections***

In compliance with 40 CFR 146.92(c), CTV will notify the regulatory agency at least 60 days before plugging the well and provide an updated Injection Well Plugging Plan, if applicable.

## 6.5 *Plugging Procedures*

The following plugging procedures are planned assuming a coiled tubing unit (CTU) is used for cement plug placement after all completion equipment is removed. The placement method may vary depending on the type of service equipment used. For instance, a maintenance rig may place the cement plug of same specification at same depths using jointed pipe and achieve the same result.

1. Bottom-hole pressure from downhole pressure gauge is recorded and kill fluid density is calculated.
2. Kill fluid of appropriate density is bullheaded into the wellbore to prevent reservoir fluid inflow and acts as a buffer fluid to flush the wellbore. After at least one wellbore volume of fluid is pumped, the well is observed to ensure static conditions, which is an indication that (1) the weighted fluid is preventing fluid migration into the wellbore and (2) there is no CO<sub>2</sub> in the wellbore. If CO<sub>2</sub> were present in the wellbore, it would migrate to surface due to density difference and expand in volume under decreasing hydrostatic pressure, resulting in non-static (flowing) conditions at surface.
3. Tubulars and downhole equipment are removed from the casing, and the well is cleaned out to total depth during rig operations. Subsequent operations are carried out using a CTU.
4. The CTU runs in the hole to total depth and begins placing cement in the casing. The coiled tubing is kept about 100 feet inside of the cement plug and is pulled uphole while cementing operations continue.
5. Once the full plug is placed, the coiled tubing is pulled above the plug and the well is circulated to ensure the depth of the top of the plug. The tubing is then pulled uphole while operations are paused to wait on cement.
6. Once the cement has set, the coiled tubing is run back in the hole to witness the depth and hardness of the plug before initiating the next cemented plug interval.
7. Abandonment mud is placed between cement plugs while pulling the coiled tubing uphole to the base of the next plug.
8. This process, beginning with step 4, is repeated for each cement plug until cement is placed to surface.

CRC follows the following standards for plugging operations:

- Bottom-hole plug: All perforations shall be plugged with cement, and the plug shall extend at least 100 feet above the top of a landed liner, the uppermost perforations, the casing cementing point, the water shut-off holes, or the oil or gas zone, whichever is highest.
- Base of USDW plug (USDW is defined as a non-exempt aquifer that has <10,000 milligrams per liter [mg/L] total dissolved solids [TDS]):
  - ◊ If there is cement behind the casing across the base of USDW, a 100-foot cement plug shall be placed inside the casing across the interface.

- ◇ If the top of the cement behind the casing is below the base of the USDW, squeeze-cementing shall be required through perforations to protect the freshwater deposits. In addition, a 100-foot cement plug shall be placed inside the casing across the fresh-saltwater interface.
- Surface plug: The casing and all annuli shall be plugged at the surface with at least a 25-foot cement plug.

**Table G2-1. Casing Details**

Name	Depth Interval (feet)	Outside Diameter (inches)	Inside Diameter (inches)	Weight (lb/ft)	Grade (API)	Design Coupling (Short or Long Threaded)	Thermal Conductivity @ 77°F (BTU/ft hr, °F)	Burst Strength (psi)	Collapse Strength (psi)	Tensile Strength (psi)
Conductor	14–54	20	19.124	94	—	—	2.62	—	—	—
Surface	14–800	13.375	12.615	54.5	K-55	Short	2.62	2,730	1,130	853,240
Intermediate	14–3,633	9.625	8.755	43.5	N-80	Long	2.62	6,330	3,810	1,065,350
Long-String	14–4,107 4,107–5,801	7	6.276	26	L-80 L-80 CRA	Long	2.62	7,240	5,410	603,930

Note: Burst pressure is the same as internal pressure, collapse pressure is the same as external pressure, and tensile strength is the same as axial loading.

**Table G2-2. Tubing and Packer Details**

Components	Setting Depth Interval (feet)	Tensile Strength/Rating (lb)	Burst Strength/Rating (psi)	Collapse Strength/Rating (psi)	Material (e.g., weight/grade/connection)
4-inch tubing	4,467	246,140	9,170	8,800	11 lb/ft, L-80 CRA, Premium
Permanent sealbore packer	4,437	200,000	7,500	7,500	26-32 lb/ft, CRA

**Table G2-3. Summary of Pre-Operational Logging and Testing**

Data Collection Location(s)	Logging or Testing Activity	Spatial Coverage or Depth
CTVW-I-DO2	Deviation checks	Every 120 feet during drilling operations
	Dual Induction Laterolog	During drilling operations
	Spontaneous Potential	During drilling operations
	Gamma Ray	During drilling operations
	Caliper	During drilling operations
	Compensated Neutron	During drilling operations
	Formation Density	During drilling operations
	Mud Log	During drilling operations
	Cement Bond Log	Along all casing strings to surface
	Casing Inspection Log	Along the long-string casing to surface
	Internal MIT: SAPT	Casing/tubing annulus above packer
	External MIT (at least one of): Oxygen Activation Log Noise Log	Along the long-string casing to surface
	Injectivity Test	Injection Zone
	Pressure Fall-off Testing	Injection Zone

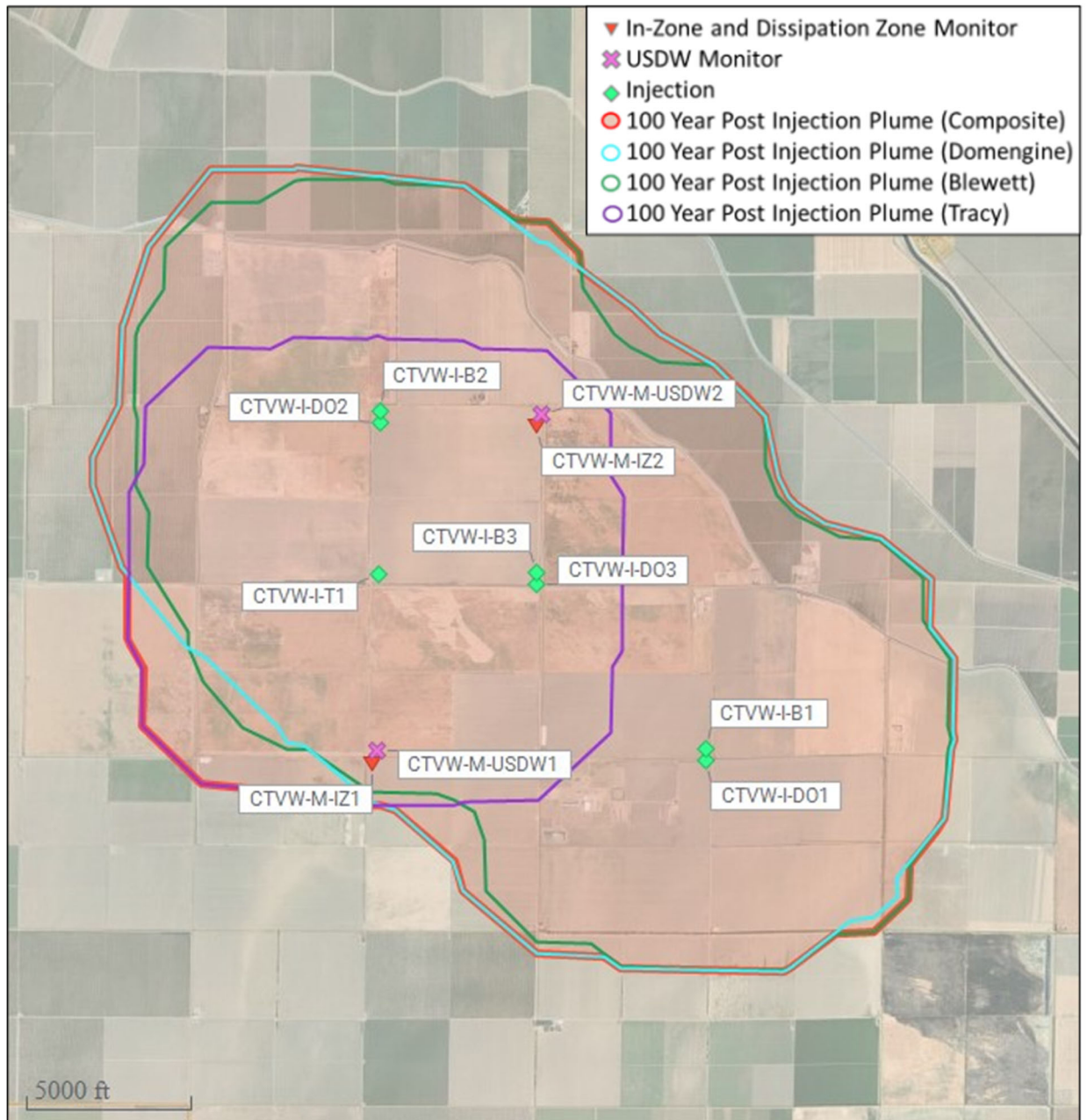
**Table G2-4. Planned MITs**

Test Description	Location
Temperature	Entire length of the sequestration well

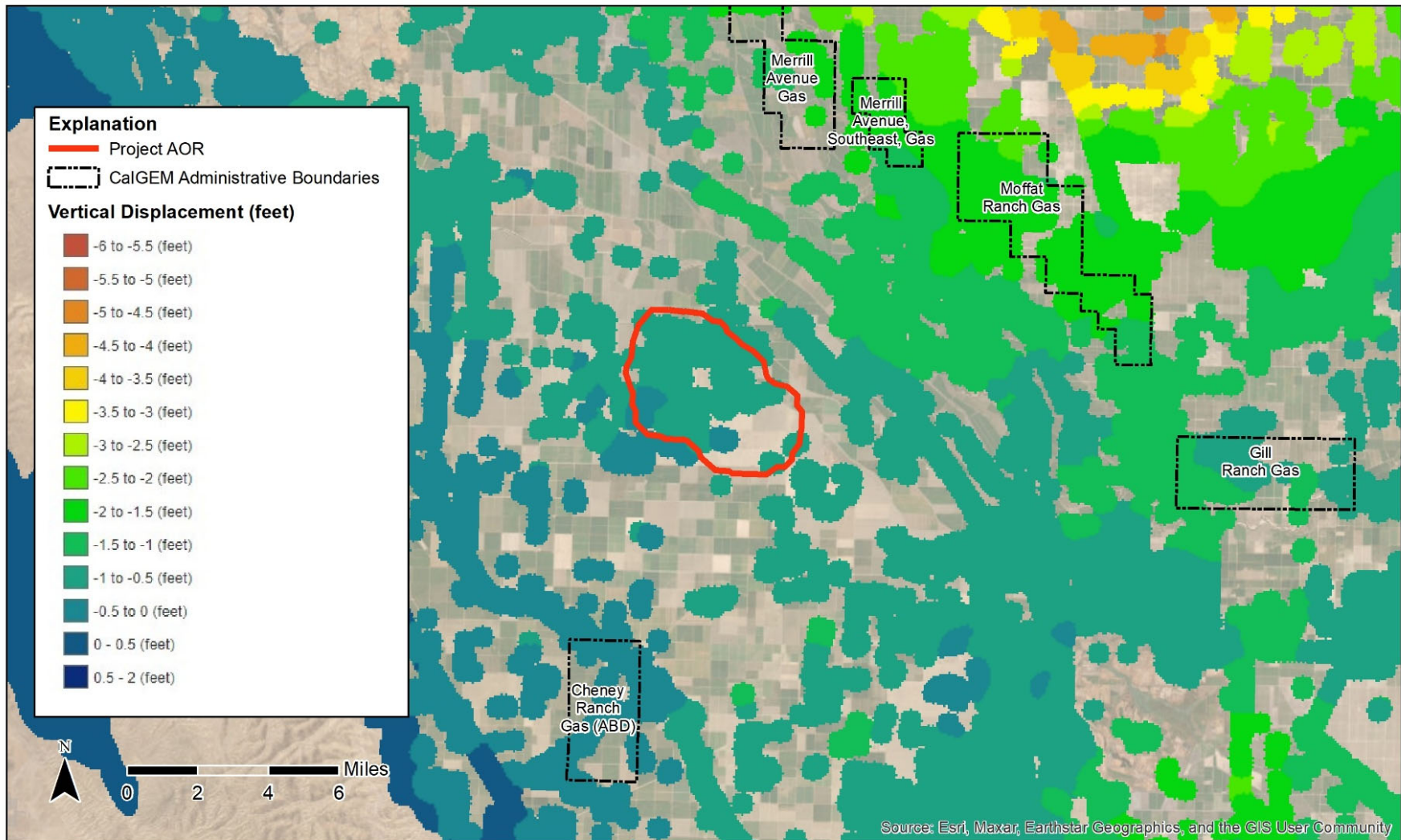


**Table G2-5. Plugging Details**

Plug Information	Plug #1	Plug #2	Plug #3	Plug #4
Diameter of boring in which plug will be placed (inches)	6.276	6.276	6.276	6.276
Depth to bottom of tubing or drill pipe (feet)	5,707	3,689	3,558	39
Sacks of cement to be used (each plug)	243	23	23	10
Slurry volume to be pumped (bbl)	49.77	4.71	4.71	2.05
Slurry weight (lb/gal)	15.8	15.8	15.8	15.8
Calculated top of plug (feet)	4,407	3,564	3,433	14
Bottom of plug (feet)	5,707	3,689	3,558	39
Type of cement or other material	Class G	Class G	Class G	Class G
Method of emplacement (e.g., balance method, retainer method, or two-plug method)	Balanced Plug, Retainer, or CT Plug			



**Figure G-1. Locations of Injection Wells and Monitoring Wells.**



**Figure G-2. Subsidence in the Area of Review.** Subsidence is -1 to 0 feet for June 2015 to July 2022. Vertical displacement data for subsidence analysis are from the Sustainable Groundwater Management Act Data Viewer (<https://sgma.water.ca.gov/>).

**ATTACHMENT G3: INJECTOR CTVW-I-DO3  
CONSTRUCTION AND PLUGGING PLAN  
40 CFR 146.86, 146.92  
CTV VI**

**Document Version History**

Version	Revision Date	File Name	Description of Change
1	7/31/2024	CP_CTVW-I-DO3	Original Submission
2	11/21/2025	Att G3 - CP - Inj - CTVW-I-DO3_v2	Response to EPA comments received August 21, 2025

**1. Facility Information**

Facility Name: CTV VI

Facility Contact: Faisal Latif, Storage Development Manager  
(661) 763-6274, faisal.latif@crc.com

Well Location: 36.82215533, -120.5308907

**2. Introduction**

Carbon Terra Vault Holdings, LLC (CTV) intends to drill seven new carbon dioxide (CO<sub>2</sub>) injection wells for CO<sub>2</sub> injection for the CTV VI storage project. **Figure G-1** identifies the wells proposed for the project.

All planned new wells will be constructed with components that are compatible with the injectate and formation fluids encountered such that corrosion rates and cumulative corrosion over the duration of the project are acceptable. The proposed well materials will be confirmed based on actual CO<sub>2</sub> composition such that material strength is sufficient to withstand all loads encountered throughout the life of the well with an acceptable safety factor incorporated into the design. Casing points will be verified by trained geologists using real-time drilling data such as logging while drilling (LWD) and mud logs to ensure protection of shallow formations. Due to the depth of the base of lowermost underground source of drinking water (USDW), a dedicated casing string will be used to isolate and protect the USDW. Cementing design, additives, and placement procedures will be sufficient to ensure isolation of the Injection Zone and protection of shallow formations using cementing materials that are compatible with injectate, formation fluids, and subsurface pressure and temperature conditions.

**Appendix 5: Injection and Monitoring Well Schematics (Appendix 5)** provides casing diagram figures for all injection and monitoring wells with construction specifications and anticipated completion details in graphical and/or tabular format.

### 3. Construction Details

#### 3.1 *Injectate Migration Prevention and Protection of the USDW*

New well construction will occur during the pre-operational testing phase, and no abnormal drilling and completion challenges are anticipated. The drilling histories of nearby wells provide key information to drilling professionals and identify the expected conditions to be encountered. The wells will be constructed with objectives to achieve target CO<sub>2</sub> injection rates, to prevent migration of fluids out of the injection zones, to protect USDWs and the shallow formations, and to allow for monitoring, as described by the following:

- Well designs will be sufficient to withstand all anticipated load cases including safety factors.
- Multiple cemented casing strings will protect shallow USDW-bearing zones from contacting injection fluid within the production tubing.
- All casing strings will be cemented in place using industry-proven recommended practices for slurry design and placement. The surface casing will be cemented with cement returns to surface. The intermediate and long-string casing will be cemented with a theoretical volume to surface.
- Cement bond logging (CBL) will be used to verify presence of cement in the production casing annulus through and above the confining layer.
- Mechanical integrity testing (MIT) will be performed on the tubing and the tubing/casing annulus.
- Upper completion design (injection tubulars, packer, and wellhead) enables monitoring devices to be installed downhole, cased hole logs to be acquired, samples to be obtained, and MIT to be conducted.
- Standard annular pressure tests (SAPTs) demonstrate that the long string casing, tubing, packer and wellhead have mechanical integrity. Internal MIT will be performed before the start of injection and any time the packer is reset to demonstrate isolation and integrity of primary barriers (tubing, packer, wellhead) and secondary barriers (casing, wellhead) for the protection of potential USDW.
- Real-time surface monitoring equipment with remote connectivity to a centralized facility and alarms provides continual awareness to potential anomalous injection conditions.
- Annular fluid (packer fluid) density and additives to mitigate corrosion provide additional protection against mechanical or chemical failure of production casing and upper completion equipment.

The injection well will be constructed using industry standards and recommended practices. Existing and future well materials comply with the following specifications:

- API Spec 5CT / ISO 11960 – Specifications for Casing and Tubing
- API Spec 5CRA / ISO 13680 – Specification for Corrosion-Resistant Alloy Seamless Tubes for use as Casing, Tubing, and Coupling Stock

- API Spec 10A / ISO 10426-1 – Cements and Materials for Cementing
- API Spec 11D1 / ISO 14310 – Downhole Equipment – Packers and Bridge Plugs
- API Spec 6A / ISO 10423 – Specification for Wellhead and Tree Equipment

### 3.2 *Materials*

Well materials used will be compatible with the CO<sub>2</sub> injectate to prevent the loss of mechanical integrity in the well:

- Tubing: Corrosion-resistant alloy (CRA) consistent with accepted industry practices for corrosion mitigation based on a mixture of formation fluids and injectates.
- Wellhead: Stainless steel or other material consistent with accepted industry practices for corrosion mitigation based on injected CO<sub>2</sub> specification.
- Packer: CRA or coating and hardened rubber elastomer element material.
- Casing: Standard N-80 casing will be installed to be compatible with the CO<sub>2</sub> injectate and verified through corrosion coupon monitoring as discussed in **Attachment C: Testing and Monitoring Plan (Attachment C)**.
- Cement: Portland cement has been used extensively in enhanced oil recovery (EOR) producers for decades. Data acquired from existing wells supports that the cement is compatible with CO<sub>2</sub> where good cement bond between formation and casing exists.

### 3.3 *Casing*

The Injection Zone is neither significantly depleted nor overpressured, and formation temperature ranges from 135 to 192°F, from the shallowest (Domengine) to the deepest (Tracy) formations that make up the Injection Zone. These conditions are not extreme, and normal cementing and casing practices meet standards. Temperature differences between the CO<sub>2</sub> injectate and reservoir will not affect well integrity. Logging data to assess casing corrosion to be collected during pre-operational testing will be used to ensure the condition of the casing will withstand the operational load associated with maintaining annular fluid and pressure.

The casing specifications in **Table G3-1** are sufficient to meet the requirements of 40 CFR 146.86(b)(1)(iv) and to allow for the safe operation at expected bottom-hole monitoring conditions.

As shown in **Figure G-2**, recent subsidence data demonstrate no appreciable subsidence in the Area of Review (AoR). Therefore, subsidence does not pose a risk to well integrity within the storage project.

### 3.4 *Cement*

Class G Portland cement will be used to cement the well. This cement is widely used in CO<sub>2</sub>-EOR wells and has been demonstrated to have properties that are not deleterious with CO<sub>2</sub>. The cement returns will be to surface for the surface casing. The intermediate casing string will also



be cemented to surface. The long-string casing string will be cemented in place with Class G Portland cement to surface. Subsequently, a CBL will be run to confirm annular isolation throughout and above the injection and confining formations (Section 6).

Cement will be placed using practices standard to the oil and gas industry. A bottom plug will be released ahead of the cement to separate drilling fluid from the cement slurry. The cement will then be pumped down the casing, circulated around the casing shoe and up the annulus toward surface. A top plug will be dropped and displaced with water until the plug bumps at the shoe, confirming full displacement of the cement. This method ensures uniform cement placement and effective zonal isolation. Class G Portland cement will be used, with additives adjusted as needed to achieve the desired density and setting characteristics.

### **3.5     *Tubing and Packer***

The information in **Appendix 5** is representative of completion equipment that will be used and meets the requirements at 40 CFR 146.86(c). Tubing and packer selection and specifications may be modified during pre-operational testing.

**Table G3-2** provides injection tubing specifications as the well will be configured at the time of injection and supports the requirements of 40 CFR 146.86(c). A suitable CRA will be selected and installed once the CO<sub>2</sub> stream impurities and impurity concentrations have been determined. The packer setting depth refers to the center of the element.

### **3.6     *Annular Fluid***

A 4 percent potassium chloride (KCl) completion fluid treated with corrosion inhibitor and biocide will be circulated in the tubing/casing annulus at the time of tubing installation. The corrosion inhibitor and biocide additives will be compatible with the wellbore environment and bottom-hole temperatures to prevent internal corrosion of the long-string casing and external corrosion of the tubing.

### **3.7     *Injectate and Formation Fluid Properties***

Details about the proposed injectate composition and properties can be found in Section 7.2 of **Attachment A: Narrative Report (Attachment A)**. Similarly, the formation fluid composition and properties can be found in Section 2.8.2 of **Attachment A**.

The anticipated injection temperature at the wellhead is 90 to 130°F.

No corrosion is expected in the absence of free-phase water provided that the entrained water is kept in solution with the CO<sub>2</sub>. This is ensured by a <25 lb/mmscf injectate specification limit, and this specification will be a condition of custody transfer at the capture facility. For transport through pipelines, which typically use standard alloy pipeline materials, this specification is critical to the mechanical integrity of the pipeline network, and out of specification product will be immediately rejected. Therefore, all product transported through pipeline to the injection wellhead is expected to be dry-phase CO<sub>2</sub> with no free-phase water present.

Injectate water solubility will vary with depth and time as temperature and pressures change. The water specification is conservative to ensure water solubility across supercritical operating ranges. CRA tubing will be used in the injection wells to mitigate any potential corrosion impact should free-phase water from the reservoir become present in the wellbore, such as during shut-in events when formation liquids, if present, could backflow into the wellbore. CTV may further optimize the maximum water content specification prior to injection based on technical analysis.

Injectate and formation water analysis will be performed during pre-operational testing and reviewed to ensure compatibility with well construction materials.

### **3.8 Alarms and Shut-off Devices**

As described in **Attachment C**, injection wells will be configured with real-time injection rate, injection pressure, and annular pressure monitoring and alarms. **Appendix 4: Operating Procedures (Appendix 4)** details the maximum injection rate and pressure thresholds for alarms and shut-off devices.

A surface shut-off valve will be installed on the wellhead and configured with automation and communication to the Central Control Facility (CCF). The valve will be used by the CCF operator remotely to respond to an emergency by shutting in the well. The valve will be configured to automatically shut-in the well if tubing or annular alarm thresholds are exceeded.

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## **4. Pre-Operational Logging and Testing**

The tests and logs listed in **Table G3-3** will be conducted in accordance with the testing required under 40 CFR 146.87. The methods are described in **Attachment C**. **Table G3-3** summarizes the pre-injection logging data and tests that CTV will acquire during the pre-operational testing and construction phase.

CTV will notify EPA at least 30 days prior to conducting mechanical integrity and formation tests and provide a detailed description of the testing procedure. Notice and the opportunity to witness these tests/logs shall be provided to EPA at least 48 hours in advance of a given test/log.

## **5. Well Operations**

Injection operation conditions are detailed in **Appendix 4**.



## **6. Injection Well Plugging Plan**

CTV will conduct injection well plugging and abandonment according to the procedures below.

### **6.1 *Planned Tests or Measures to Determine Bottom-Hole Reservoir Pressure***

Before beginning the plugging and abandonment process, the pressure used to squeeze the cement will be determined from the bottom-hole pressure gauge. During plugging operations, the weighted cement slurry displacement fluids will be overbalanced to the reservoir pressure ensuring that no reservoir fluids will be able to enter the wellbore during cementing operations.

### **6.2 *Planned External Mechanical Integrity Test(s)***

CTV will conduct at least one external MIT prior to plugging the injection well as required by 40 CFR 146.92(a). A temperature log will be run over the entire depth of each sequestration well (**Table G3-4**). Data from the logging runs will be evaluated for anomalies in the temperature curve, which would be indicative of fluid migration out of the Injection Zone. Data will be compared to the data from temperature logs performed prior to injection of CO<sub>2</sub>. Deviations between the temperature log performed before, after, and during injection may indicate issues related to the integrity of the well casing or cement.

### **6.3 *Information on Plugs***

CTV will use the materials and methods noted in **Table G3-5** to plug the injection well. The cement formulation and required certification documents will be submitted to the agency with the well plugging plan. The owner or operator will report the wet density and will retain duplicate samples of the cement used for each plug.

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The wells will have this cement placed as detailed in **Table G3-5**, and all portions of the wellbore that are not plugged with cement will be filled with sufficiently weighted abandonment mud. The cement will be set in plug segments per CTV's standard procedures.

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## 6.5 *Plugging Procedures*

The following plugging procedures are planned assuming a coiled tubing unit (CTU) is used for cement plug placement after all completion equipment is removed. The placement method may vary depending on the type of service equipment used. For instance, a maintenance rig may place the cement plug of same specification at same depths using jointed pipe and achieve the same result.

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3. Tubulars and downhole equipment are removed from the casing, and the well is cleaned out to total depth during rig operations. Subsequent operations are carried out using a CTU.
4. The CTU runs in the hole to total depth and begins placing cement in the casing. The coiled tubing is kept about 100 feet inside of the cement plug and is pulled uphole while cementing operations continue.
5. Once the full plug is placed, the coiled tubing is pulled above the plug and the well is circulated to ensure the depth of the top of the plug. The tubing is then pulled uphole while operations are paused to wait on cement.
6. Once the cement has set, the coiled tubing is run back in the hole to witness the depth and hardness of the plug before initiating the next cemented plug interval.
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Note: Burst pressure is the same as internal pressure, collapse pressure is the same as external pressure, and tensile strength is the same as axial loading.

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Permanent Sealbore packer	4,519	200,000	7,500	7,500	26-32 lb/ft, CRA

**Table G3-3. Summary of Pre-Operational Logging and Testing**

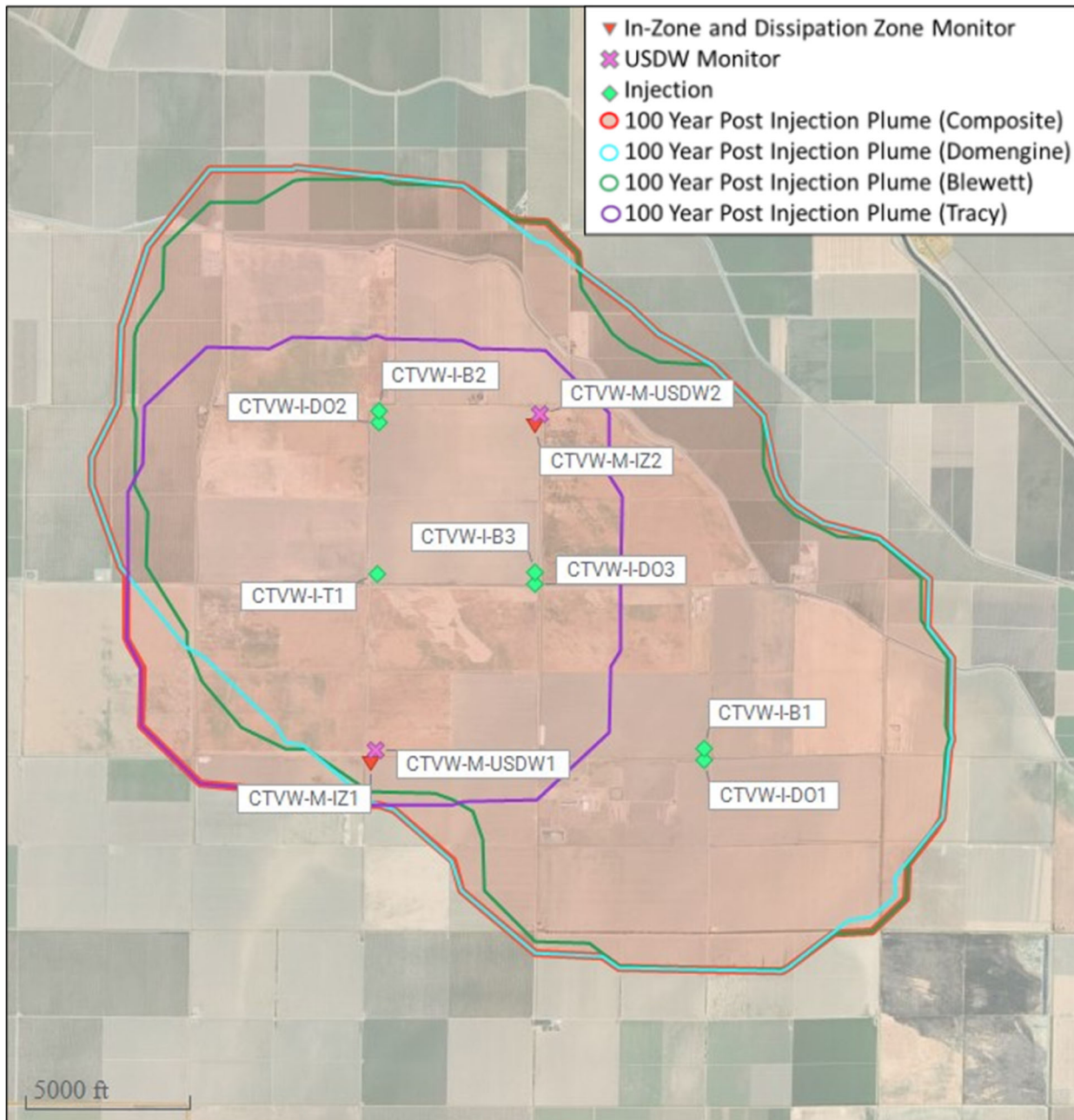
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	Compensated Neutron	During drilling operations
	Formation Density	During drilling operations
	Mud Log	During drilling operations
	Cement Bond Log	Along all casing strings to surface
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	Internal MIT: SAPT	Casing/tubing annulus above packer
	External MIT (at least one of): Oxygen Activation Log Noise Log	Along the long-string casing to surface
	Injectivity Test	Injection Zone
	Pressure Fall-off Testing	Injection Zone

**Table G3-4. Planned MITs**

Test Description	Location
Temperature	Entire length of the sequestration well

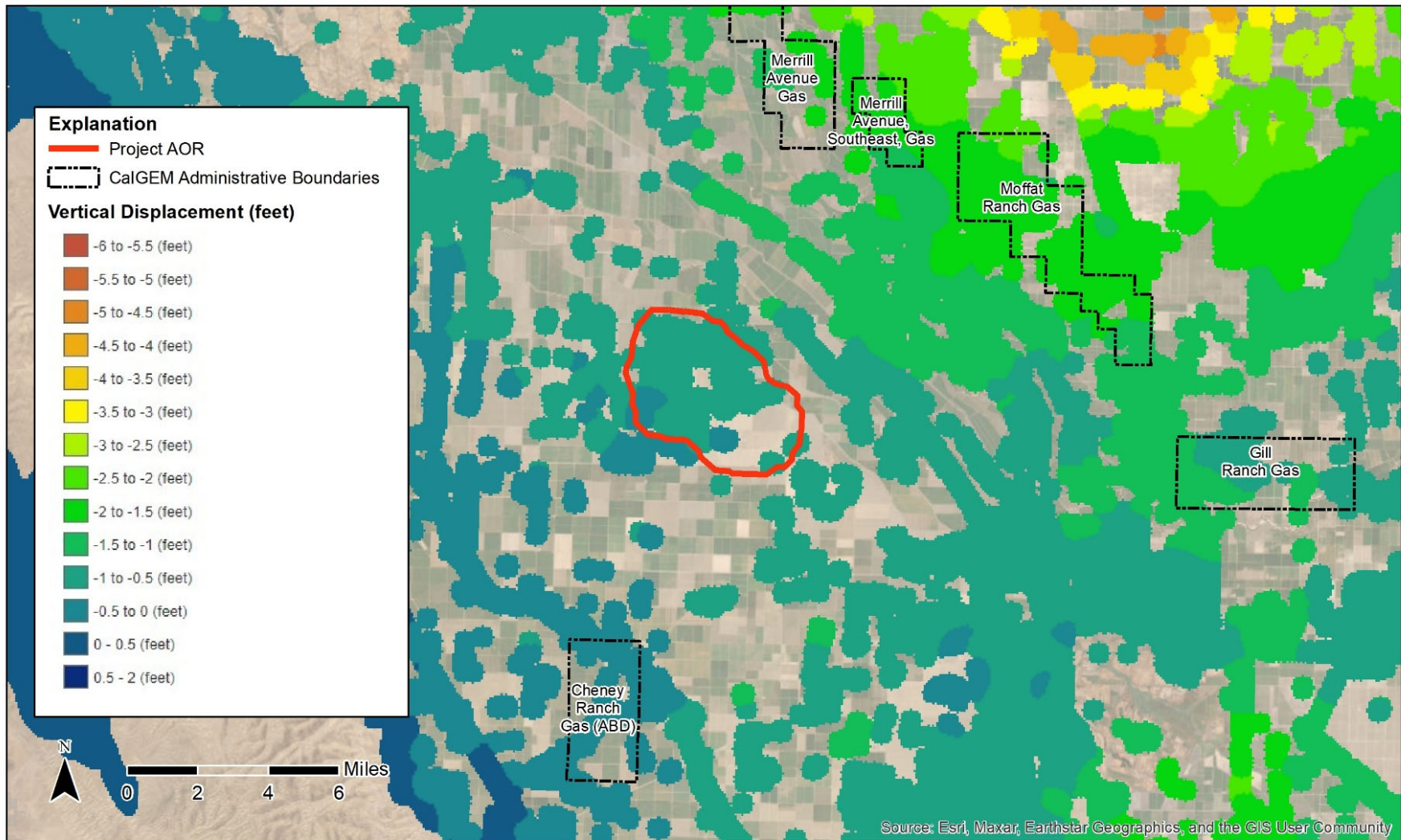
**Table G3-5. Plugging Details**

Plug Information	Plug #1	Plug #2	Plug #3	Plug #4
Diameter of boring in which plug will be placed (inches)	6.276	6.276	6.276	6.276
Depth to bottom of tubing or drill pipe (feet)	5,754	3,818	3,674	39
Sacks of cement to be used (each plug)	236	23	23	10
Slurry volume to be pumped (bbl)	48.33	4.71	4.71	2.05
Slurry weight (lb/gal)	15.8	15.8	15.8	15.8
Calculated top of plug (feet)	4,489	3,693	3,549	14
Bottom of plug (feet)	5,754	3,818	3,674	39
Type of cement or other material	Class G	Class G	Class G	Class G
Method of emplacement (e.g., balance method, retainer method, or two-plug method)	Balanced Plug, Retainer, or CT Plug			



**Figure G-1. Locations of Injection Wells and Monitoring Wells.**





**Figure G-2. Subsidence in the Area of Review.** Subsidence is -1 to 0 feet for June 2015 to July 2022. Vertical displacement data for subsidence analysis are from the Sustainable Groundwater Management Act Data Viewer (<https://sgma.water.ca.gov/>).



**ATTACHMENT G4: INJECTOR CTVW-I-B1  
CONSTRUCTION AND PLUGGING PLAN  
40 CFR 146.86, 146.92  
CTV VI**

**Document Version History**

Version	Revision Date	File Name	Description of Change
1	7/31/2024	CP_CTVW-I-B1	Original Submission
2	11/21/2025	Att G4 - CP - Inj - CTVW-I-B1_v2	Response to EPA comments received August 21, 2025.

**1. Facility Information**

Facility Name: CTV VI

Facility Contact: Faisal Latif, Storage Development Manager  
(661) 763-6274. faisal.latif@crc.com

Well Location: 36.80749903, -120.5133076

**2. Introduction**

Carbon Terra Vault Holdings, LLC (CTV) intends to drill seven new carbon dioxide (CO<sub>2</sub>) injection wells for CO<sub>2</sub> injection for the CTV VI storage project. **Figure G-1** identifies the wells proposed for the project.

All planned new wells will be constructed with components that are compatible with the injectate and formation fluids encountered such that corrosion rates and cumulative corrosion over the duration of the project are acceptable. The proposed well materials will be confirmed based on actual CO<sub>2</sub> composition such that material strength is sufficient to withstand all loads encountered throughout the life of the well with an acceptable safety factor incorporated into the design. Casing points will be verified by trained geologists using real-time drilling data such as logging while drilling (LWD) and mud logs to ensure protection of shallow formations. Due to the depth of the base of lowermost underground source of drinking water (USDW), a dedicated casing string will be used to isolate and protect the USDW. Cementing design, additives, and placement procedures will be sufficient to ensure isolation of the Injection Zone and protection of shallow formations using cementing materials that are compatible with injectate, formation fluids, and subsurface pressure and temperature conditions.

**Appendix 5: Injection and Monitoring Well Schematics (Appendix 5)** provides casing diagram figures for all injection and monitoring wells with construction specifications and anticipated completion details in graphical and/or tabular format.

### 3. Construction Details

#### 3.1 *Injectate Migration Prevention and Protection of the USDW*

New well construction will occur during the pre-operational testing phase, and no abnormal drilling and completion challenges are anticipated. The drilling histories of nearby wells provide key information to drilling professionals and identify the expected conditions to be encountered. The wells will be constructed with objectives to achieve target CO<sub>2</sub> injection rates, to prevent migration of fluids out of the injection zones, to protect USDWs and the shallow formations, and to allow for monitoring, as described by the following:

- Well designs will be sufficient to withstand all anticipated load cases including safety factors.
- Multiple cemented casing strings will protect shallow USDW-bearing zones from contacting injection fluid within the production tubing.
- All casing strings will be cemented in place using industry-proven recommended practices for slurry design and placement. The surface casing will be cemented with cement returns to surface. The intermediate and long-string casing will be cemented with a theoretical volume to surface.
- Cement bond logging (CBL) will be used to verify presence of cement in the production casing annulus through and above the confining layer.
- Mechanical integrity testing (MIT) will be performed on the tubing and the tubing/casing annulus.
- Upper completion design (injection tubulars, packer, and wellhead) enables monitoring devices to be installed downhole, cased hole logs to be acquired, samples to be obtained, and MIT to be conducted.
- Standard annular pressure tests (SAPTs) demonstrate that the long string casing, tubing, packer and wellhead have mechanical integrity. Internal MIT will be performed before the start of injection and any time the packer is reset to demonstrate isolation and integrity of primary barriers (tubing, packer, wellhead) and secondary barriers (casing, wellhead) for the protection of potential USDW.
- Real-time surface monitoring equipment with remote connectivity to a centralized facility and alarms provides continual awareness to potential anomalous injection conditions.
- Annular fluid (packer fluid) density and additives to mitigate corrosion provide additional protection against mechanical or chemical failure of production casing and upper completion equipment.

The injection well will be constructed using industry standards and recommended practices. Existing and future well materials comply with the following specifications.:

- API Spec 5CT / ISO 11960 – Specifications for Casing and Tubing
- API Spec 5CRA / ISO 13680 – Specification for Corrosion-Resistant Alloy Seamless Tubes for use as Casing, Tubing, and Coupling Stock

- API Spec 10A / ISO 10426-1 – Cements and Materials for Cementing
- API Spec 11D1 / ISO 14310 – Downhole Equipment – Packers and Bridge Plugs
- API Spec 6A / ISO 10423 – Specification for Wellhead and Tree Equipment

### 3.2 *Materials*

Well materials used will be compatible with the CO<sub>2</sub> injectate to prevent the loss of mechanical integrity in the well:

- Tubing: Corrosion-resistant alloy (CRA) consistent with accepted industry practices for corrosion mitigation based on a mixture of formation fluids and injectates.
- Wellhead: Stainless steel or other material consistent with accepted industry practices for corrosion mitigation based on injected CO<sub>2</sub> specification.
- Packer: CRA or coating and hardened rubber elastomer element material.
- Casing: Standard N-80 casing will be installed to be compatible with the CO<sub>2</sub> injectate and verified through corrosion coupon monitoring as discussed in **Attachment C: Testing and Monitoring Plan (Attachment C)**.
- Cement: Portland cement has been used extensively in enhanced oil recovery (EOR) producers for decades. Data acquired from existing wells supports that the cement is compatible with CO<sub>2</sub> where good cement bond between formation and casing exists.

### 3.3 *Casing*

The Injection Zone is neither significantly depleted nor overpressured, and formation temperature ranges from 135 to 192°F, from the shallowest (Domengine) to the deepest (Tracy) formations that make up the Injection Zone. These conditions are not extreme, and normal cementing and casing practices meet standards. Temperature differences between the CO<sub>2</sub> injectate and reservoir will not affect well integrity. Logging data to assess casing corrosion to be collected during pre-operational testing will be used to ensure the condition of the casing will withstand the operational load associated with maintaining annular fluid and pressure.

The casing specifications in **Table G4-1** are sufficient to meet the requirements of 40 CFR 146.86(b)(1)(iv) and to allow for the safe operation at expected bottom-hole monitoring conditions.

As shown in **Figure G-2**, recent subsidence data demonstrate no appreciable subsidence in the Area of Review (AoR). Therefore, subsidence does not pose a risk to well integrity within the storage project.

### 3.4 *Cement*

Class G Portland cement will be used to cement the well. This cement is widely used in CO<sub>2</sub>-EOR wells and has been demonstrated to have properties that are not deleterious with CO<sub>2</sub>. The cement returns will be to surface for the surface casing. The intermediate casing string will also

be cemented to surface. The long-string casing string will be cemented in place with Class G Portland cement to surface. Subsequently, a CBL will be run to confirm annular isolation throughout and above the injection and confining formations (Section 6).

Cement will be placed using practices standard to the oil and gas industry. A bottom plug will be released ahead of the cement to separate drilling fluid from the cement slurry. The cement will then be pumped down the casing, circulated around the casing shoe and up the annulus toward surface. A top plug will be dropped and displaced with water until the plug bumps at the shoe, confirming full displacement of the cement. This method ensures uniform cement placement and effective zonal isolation. Class G Portland cement will be used, with additives adjusted as needed to achieve the desired density and setting characteristics.

### **3.5     *Tubing and Packer***

The information in **Appendix 5** is representative of completion equipment that will be used and meets the requirements at 40 CFR 146.86(c). Tubing and packer selection and specifications may be modified during pre-operational testing.

**Table G4-2** provides injection tubing specifications as the well will be configured at the time of injection and supports the requirements of 40 CFR 146.86(c). A suitable CRA will be selected and installed once the CO<sub>2</sub> stream impurities and impurity concentrations have been determined. The packer setting depth refers to the center of the element.

### **3.6     *Annular Fluid***

A 4 percent potassium chloride (KCl) completion fluid treated with corrosion inhibitor and biocide will be circulated in the tubing/casing annulus at the time of tubing installation. The corrosion inhibitor and biocide additives will be compatible with the wellbore environment and bottom-hole temperatures to prevent internal corrosion of the long-string casing and external corrosion of the tubing.

### **3.7     *Injectate and Formation Fluid Properties***

Details about the proposed injectate composition and properties can be found in Section 7.2 of **Attachment A: Narrative Report (Attachment A)**. Similarly, the formation fluid composition and properties can be found in Section 2.8.2 of **Attachment A**.

The anticipated injection temperature at the wellhead is 90 to 130°F.

No corrosion is expected in the absence of free-phase water provided that the entrained water is kept in solution with the CO<sub>2</sub>. This is ensured by a <25 lb/mmscf injectate specification limit, and this specification will be a condition of custody transfer at the capture facility. For transport through pipelines, which typically use standard alloy pipeline materials, this specification is critical to the mechanical integrity of the pipeline network, and out of specification product will be immediately rejected. Therefore, all product transported through pipeline to the injection wellhead is expected to be dry-phase CO<sub>2</sub> with no free-phase water present.

Injectate water solubility will vary with depth and time as temperature and pressures change. The water specification is conservative to ensure water solubility across supercritical operating ranges. CRA tubing will be used in the injection wells to mitigate any potential corrosion impact should free-phase water from the reservoir become present in the wellbore, such as during shut-in events when formation liquids, if present, could backflow into the wellbore. CTV may further optimize the maximum water content specification prior to injection based on technical analysis.

Injectate and formation water analysis will be performed during pre-operational testing and reviewed to ensure compatibility with well construction materials.

### **3.8 Alarms and Shut-off Devices**

As described in **Attachment C**, injection wells will be configured with real-time injection rate, injection pressure, and annular pressure monitoring and alarms. **Appendix 4: Operating Procedures (Appendix 4)** details the maximum injection rate and pressure thresholds for alarms and shut-off devices.

A surface shut-off valve will be installed on the wellhead and configured with automation and communication to the Central Control Facility (CCF). The valve will be used by the CCF operator remotely to respond to an emergency by shutting in the well. The valve will be configured to automatically shut-in the well if tubing or annular alarm thresholds are exceeded.

The EPA Preamble to the Class VI Rule states (Federal Register Vol.75, No.237, p.77258): “EPA believes that requiring automatic surface shut-off devices instead of down-hole devices provides more flexibility to owners or operators when performing required mechanical integrity tests. Additionally, this requirement addresses concerns about risks associated with routine well workovers that may be complicated by the presence of down-hole devices while still maintaining USDW protection.” For these reasons, CTV will design the injection well with a surface shut-off valve at the wellhead and not a downhole device.

## **4. Pre-Operational Logging and Testing**

The tests and logs listed in **Table G4-3** will be conducted in accordance with the testing required under 40 CFR 146.87. The methods are described in **Attachment C**. **Table G4-3** summarizes the pre-injection logging data and tests that CTV will acquire during the pre-operational testing and construction phase.

CTV will notify EPA at least 30 days prior to conducting mechanical integrity and formation tests and provide a detailed description of the testing procedure. Notice and the opportunity to witness these tests/logs shall be provided to EPA at least 48 hours in advance of a given test/log.

## **5. Well Operations**

Injection operation conditions are detailed in **Appendix 4**.

## **6. Injection Well Plugging Plan**

CTV will conduct injection well plugging and abandonment according to the procedures below.

### **6.1 *Planned Tests or Measures to Determine Bottom-Hole Reservoir Pressure***

Before beginning the plugging and abandonment process, the pressure used to squeeze the cement will be determined from the bottom-hole pressure gauge. During plugging operations, the weighted cement slurry displacement fluids will be overbalanced to the reservoir pressure ensuring that no reservoir fluids will be able to enter the wellbore during cementing operations.

### **6.2 *Planned External Mechanical Integrity Test(s)***

CTV will conduct at least one external MIT prior to plugging the injection well as required by 40 CFR 146.92(a). A temperature log will be run over the entire depth of each sequestration well (**Table G4-4**). Data from the logging runs will be evaluated for anomalies in the temperature curve, which would be indicative of fluid migration out of the Injection Zone. Data will be compared to the data from temperature logs performed prior to injection of CO<sub>2</sub>. Deviations between the temperature log performed before, after, and during injection may indicate issues related to the integrity of the well casing or cement.

### **6.3 *Information on Plugs***

CTV will use the materials and methods noted in **Table G4-5** to plug the injection well. The cement formulation and required certification documents will be submitted to the agency with the well plugging plan. The owner or operator will report the wet density and will retain duplicate samples of the cement used for each plug.

A standard Portland cement blend with specifications consistent with API Spec 10A will be designed with a minimum 1,000 pounds per square inch (psi) compressive strength and a maximum liquid permeability of 0.1 millidarcies (mD). The properties of this cement blend will be at least equivalent to the properties of Class G Portland cement, and the cement plug will provide an effective, long-term barrier to prevent migration of CO<sub>2</sub> into and within the wellbore. This cement is widely used in CO<sub>2</sub>-EOR wells and has been demonstrated to have properties that are not deleterious with CO<sub>2</sub>.

The wells will have this cement placed as detailed in **Table G4-5**, and all portions of the wellbore that are not plugged with cement will be filled with sufficiently weighted abandonment mud. The cement will be set in plug segments per CTV's standard procedures.

### **6.4 *Notifications, Permits, and Inspections***

In compliance with 40 CFR 146.92(c), CTV will notify the regulatory agency at least 60 days before plugging the well and provide an updated Injection Well Plugging Plan, if applicable.

## 6.5 *Plugging Procedures*

The following plugging procedures are planned assuming a coiled tubing unit (CTU) is used for cement plug placement after all completion equipment is removed. The placement method may vary depending on the type of service equipment used. For instance, a maintenance rig may place the cement plug of same specification at same depths using jointed pipe and achieve the same result.

1. Bottom-hole pressure from downhole pressure gauge is recorded and kill fluid density is calculated.
2. Kill fluid of appropriate density is bullheaded into the wellbore to prevent reservoir fluid inflow and acts as a buffer fluid to flush the wellbore. After at least one wellbore volume of fluid is pumped, the well is observed to ensure static conditions, which is an indication that (1) the weighted fluid is preventing fluid migration into the wellbore and (2) there is no CO<sub>2</sub> in the wellbore. If CO<sub>2</sub> were present in the wellbore, it would migrate to surface due to density difference and expand in volume under decreasing hydrostatic pressure, resulting in non-static (flowing) conditions at surface.
3. Tubulars and downhole equipment are removed from the casing, and the well is cleaned out to total depth during rig operations. Subsequent operations are carried out using a CTU.
4. The CTU runs in the hole to total depth and begins placing cement in the casing. The coiled tubing is kept about 100 feet inside of the cement plug and is pulled uphole while cementing operations continue.
5. Once the full plug is placed, the coiled tubing is pulled above the plug and the well is circulated to ensure the depth of the top of the plug. The tubing is then pulled uphole while operations are paused to wait on cement.
6. Once the cement has set, the coiled tubing is run back in the hole to witness the depth and hardness of the plug before initiating the next cemented plug interval.
7. Abandonment mud is placed between cement plugs while pulling the coiled tubing uphole to the base of the next plug.
8. This process, beginning with step 4, is repeated for each cement plug until cement is placed to surface.

CRC follows the following standards for plugging operations:

- Bottom-hole plug: All perforations shall be plugged with cement, and the plug shall extend at least 100 feet above the top of a landed liner, the uppermost perforations, the casing cementing point, the water shut-off holes, or the oil or gas zone, whichever is highest.
- Base of USDW plug (USDW is defined as a non-exempt aquifer that has <10,000 milligrams per liter [mg/L] total dissolved solids [TDS]):
  - ◊ If there is cement behind the casing across the base of USDW, a 100-foot cement plug shall be placed inside the casing across the interface.

- ◇ If the top of the cement behind the casing is below the base of the USDW, squeeze-cementing shall be required through perforations to protect the freshwater deposits. In addition, a 100-foot cement plug shall be placed inside the casing across the fresh-saltwater interface.
- Surface plug: The casing and all annuli shall be plugged at the surface with at least a 25-foot cement plug.



**Table G4-1. Casing Details**

Name	Depth Interval (feet)	Outside Diameter (inches)	Inside Diameter (inches)	Weight (lb/ft)	Grade (API)	Design Coupling (Short or Long Threaded)	Thermal Conductivity @ 77°F (BTU/ft hr, °F)	Burst Strength (psi)	Collapse Strength (psi)	Tensile Strength (psi)
Conductor	14–54	20	19.124	94	—	—	2.62	—	—	—
Surface	14–800	13.375	12.615	54.5	K-55	Short	2.62	2,730	1,130	853,240
Intermediate	14–3,924	9.625	8.755	43.5	N-80	Long	2.62	6,330	3,810	1,065,350
Long-String	14–4,316 4,316–9,735	7	6.276	26	L-80 L-80 CRA	Long	2.62	7,240	5,410	603,930

Note: Burst pressure is the same as internal pressure, collapse pressure is the same as external pressure, and tensile strength is the same as axial loading.

**Table G4-2. Tubing and Packer Details**

Components	Setting Depth Interval (feet)	Tensile Strength/Rating (lb)	Burst Strength/Rating (psi)	Collapse Strength/Rating (psi)	Material (e.g., weight/grade/connection)
4½-inch tubing	8,234	267,040	7,780	6,350	11.6 lb/ft, L-80 CRA, Premium
Permanent Sealbore Packer	8,204	200,000	7,500	7,500	26-32 lb/ft, CRA

**Table G4-3. Summary of Pre-Operational Logging and Testing**

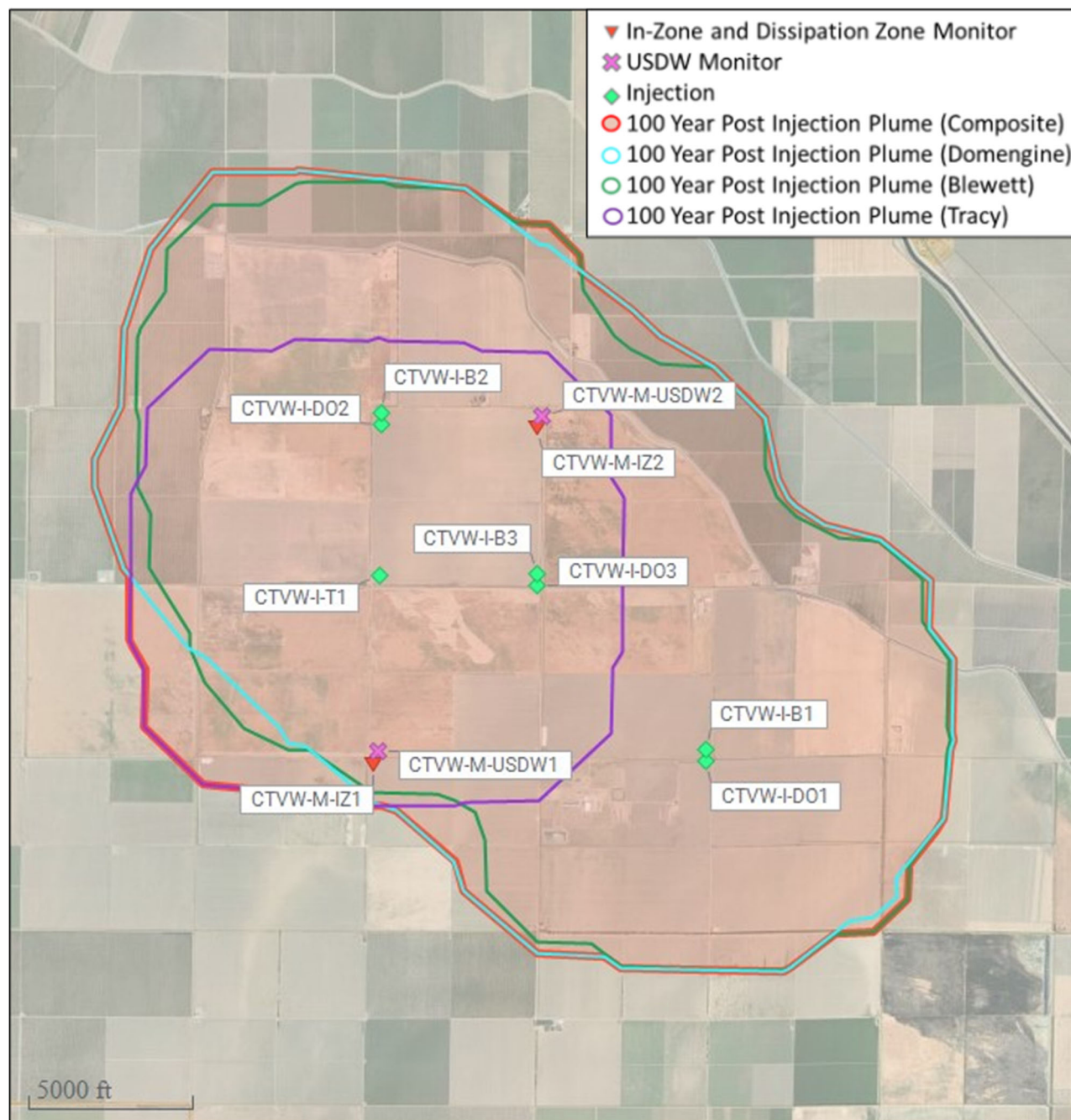
Data Collection Location(s)	Logging or Testing Activity	Spatial Coverage or Depth
CTVW-I-B1	Deviation checks	Every 120 feet during drilling operations
	Dual Induction Laterolog	During drilling operations
	Spontaneous Potential	During drilling operations
	Gamma Ray	During drilling operations
	Caliper	During drilling operations
	Compensated Neutron	During drilling operations
	Formation Density	During drilling operations
	Mud Log	During drilling operations
	Cement Bond Log	Along all casing strings to surface
	Casing Inspection Log	Along the long-string casing to surface
	Internal MIT: SAPT	Casing/tubing annulus above packer
	External MIT (at least one of): Oxygen Activation Log Noise Log	Along the long-string casing to surface
	Injectivity Test	Injection Zone
	Pressure Fall-off Testing	Injection Zone

**Table G4-4. Planned MITs**

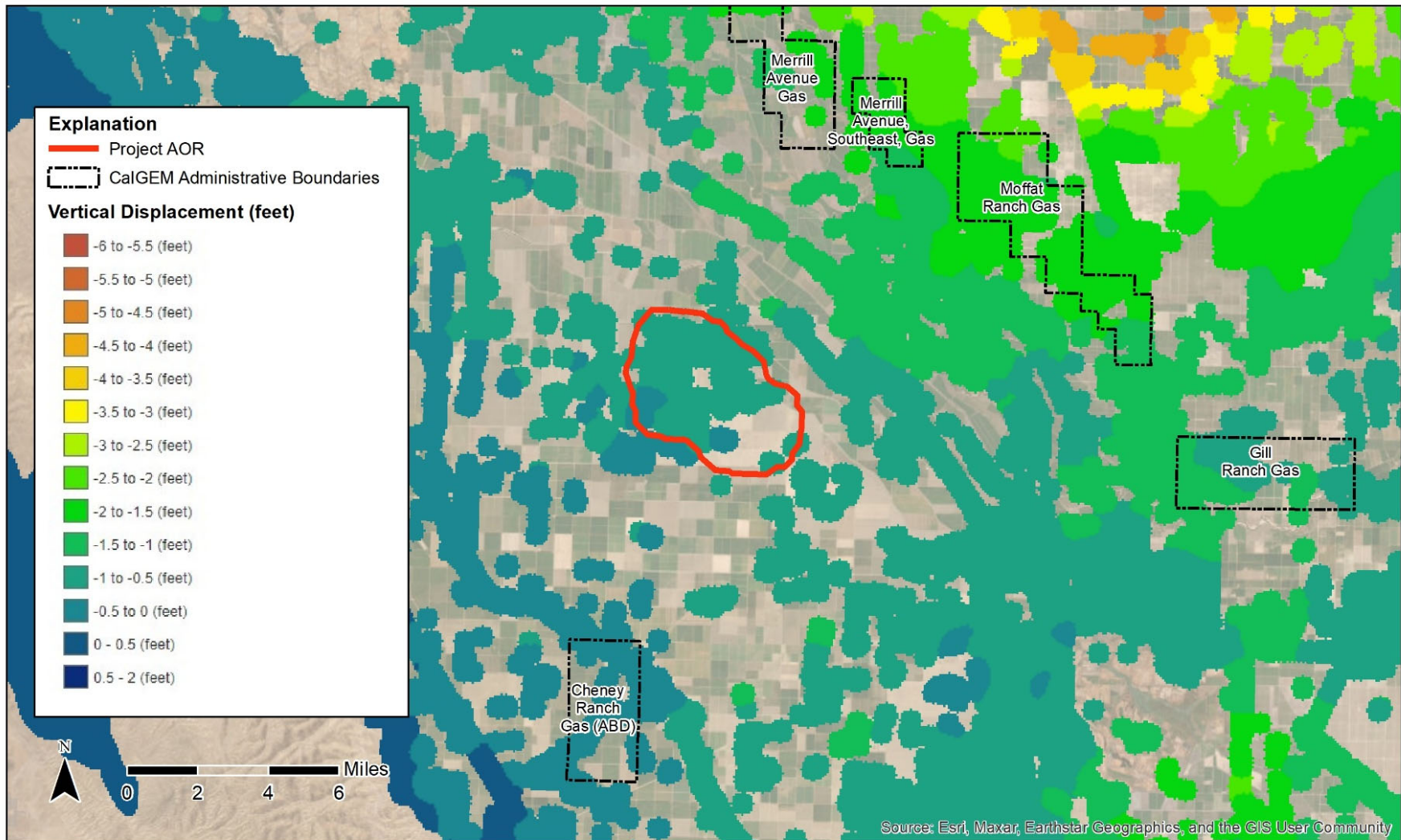
Test Description	Location
Temperature	Entire length of the sequestration well

**Table G4-5. Plugging Details**

Plug Information	Plug #1	Plug #2	Plug #3	Plug #4	Plug #5	Plug #6
Diameter of boring in which plug will be placed (inches)	6.276	6.276	6.276	6.276	6.276	6.276
Depth to bottom of tubing or drill pipe (feet)	9,641	8,963	5,892	3,975	3,850	39
Sacks of cement to be used (each plug)	53	147	238	23	23	10
Slurry volume to be pumped (bbl)	10.85	30.11	48.74	4.71	4.71	2.05
Slurry weight (lb/gal)	15.8	15.8	15.8	15.8	15.8	15.8
Calculated top of plug (feet)	9,355	8,174	4,616	3,850	3,725	14
Bottom of plug (feet)	9,641	8,963	5,892	3,975	3,850	39
Type of cement or other material	Class G	Class G	Class G	Class G	Class G	Class G
Method of emplacement (e.g., balance method, retainer method, or two-plug method)	Balanced Plug, Retainer, or CT Plug					



**Figure G-1. Locations of Injection Wells and Monitoring Wells.**



**Figure G-2. Subsidence in the Area of Review.** Subsidence is -1 to 0 feet for June 2015 to July 2022. Vertical displacement data for subsidence analysis are from the Sustainable Groundwater Management Act Data Viewer (<https://sgma.water.ca.gov/>).

**ATTACHMENT G5: INJECTOR CTVW-I-B2  
CONSTRUCTION AND PLUGGING PLAN  
40 CFR 146.86, 146.92  
CTV VI**

**Document Version History**

Version	Revision Date	File Name	Description of Change
1	7/31/2024	CP_CTVW-I-B2	Original Submission
2	11/21/2025	Att G5 - CP - Inj - CTVW-I-B2_v2	Response to EPA comments received August 21, 2025

**1. Facility Information**

Facility Name: CTV VI

Facility Contact: Faisal Latif, Storage Development Manager  
(661) 763-6274, faisal.latif@crc.com

Well Location: 36.83568421, -120.5473443

**2. Introduction**

Carbon Terra Vault Holdings, LLC (CTV) intends to drill seven new carbon dioxide (CO<sub>2</sub>) injection wells for CO<sub>2</sub> injection for the CTV VI storage project. **Figure G-1** identifies the wells proposed for the project.

All planned new wells will be constructed with components that are compatible with the injectate and formation fluids encountered such that corrosion rates and cumulative corrosion over the duration of the project are acceptable. The proposed well materials will be confirmed based on actual CO<sub>2</sub> composition such that material strength is sufficient to withstand all loads encountered throughout the life of the well with an acceptable safety factor incorporated into the design. Casing points will be verified by trained geologists using real-time drilling data such as logging while drilling (LWD) and mud logs to ensure protection of shallow formations. Due to the depth of the base of lowermost underground source of drinking water (USDW), a dedicated casing string will be used to isolate and protect the USDW. Cementing design, additives, and placement procedures will be sufficient to ensure isolation of the Injection Zone and protection of shallow formations using cementing materials that are compatible with injectate, formation fluids, and subsurface pressure and temperature conditions.

**Appendix 5: Injection and Monitoring Well Schematics (Appendix 5)** provides casing diagram figures for all injection and monitoring wells with construction specifications and anticipated completion details in graphical and/or tabular format.

### 3. Construction Details

#### 3.1 *Injectate Migration Prevention and Protection of the USDW*

New well construction will occur during the pre-operational testing phase, and no abnormal drilling and completion challenges are anticipated. The drilling histories of nearby wells provide key information to drilling professionals and identify the expected conditions to be encountered. The wells will be constructed with objectives to achieve target CO<sub>2</sub> injection rates, to prevent migration of fluids out of the injection zones, to protect USDWs and the shallow formations, and to allow for monitoring, as described by the following:

- Well designs will be sufficient to withstand all anticipated load cases including safety factors.
- Multiple cemented casing strings will protect shallow USDW-bearing zones from contacting injection fluid within the production tubing.
- All casing strings will be cemented in place using industry-proven recommended practices for slurry design and placement. The surface casing will be cemented with cement returns to surface. The intermediate and long-string casing will be cemented with a theoretical volume to surface.
- Cement bond logging (CBL) will be used to verify presence of cement in the production casing annulus through and above the confining layer.
- Mechanical integrity testing (MIT) will be performed on the tubing and the tubing/casing annulus.
- Upper completion design (injection tubulars, packer, and wellhead) enables monitoring devices to be installed downhole, cased hole logs to be acquired, samples to be obtained, and MIT to be conducted.
- Standard annular pressure tests (SAPTs) demonstrate that the long string casing, tubing, packer and wellhead have mechanical integrity. Internal MIT will be performed before the start of injection and any time the packer is reset to demonstrate isolation and integrity of primary barriers (tubing, packer, wellhead) and secondary barriers (casing, wellhead) for the protection of potential USDW.
- Real-time surface monitoring equipment with remote connectivity to a centralized facility and alarms provides continual awareness to potential anomalous injection conditions.
- Annular fluid (packer fluid) density and additives to mitigate corrosion provide additional protection against mechanical or chemical failure of production casing and upper completion equipment.

The injection well will be constructed using industry standards and recommended practices. Existing and future well materials comply with the following specifications:

- API Spec 5CT / ISO 11960 – Specifications for Casing and Tubing
- API Spec 5CRA / ISO 13680 – Specification for Corrosion-Resistant Alloy Seamless Tubes for use as Casing, Tubing, and Coupling Stock



- API Spec 10A / ISO 10426-1 – Cements and Materials for Cementing
- API Spec 11D1 / ISO 14310 – Downhole Equipment – Packers and Bridge Plugs
- API Spec 6A / ISO 10423 – Specification for Wellhead and Tree Equipment

### 3.2 *Materials*

Well materials used will be compatible with the CO<sub>2</sub> injectate to prevent the loss of mechanical integrity in the well:

- Tubing: Corrosion-resistant alloy (CRA) consistent with accepted industry practices for corrosion mitigation based on a mixture of formation fluids and injectates.
- Wellhead: Stainless steel or other material consistent with accepted industry practices for corrosion mitigation based on injected CO<sub>2</sub> specification.
- Packer: CRA or coating and hardened rubber elastomer element material.
- Casing: Standard N-80 casing will be installed to be compatible with the CO<sub>2</sub> injectate and verified through corrosion coupon monitoring as discussed in **Attachment C: Testing and Monitoring Plan (Attachment C)**.
- Cement: Portland cement has been used extensively in enhanced oil recovery (EOR) producers for decades. Data acquired from existing wells supports that the cement is compatible with CO<sub>2</sub> where good cement bond between formation and casing exists.

### 3.3 *Casing*

The Injection Zone is neither significantly depleted nor overpressured, and formation temperature ranges from 135 to 192°F, from the shallowest (Domengine) to the deepest (Tracy) formations that make up the Injection Zone. These conditions are not extreme, and normal cementing and casing practices meet standards. Temperature differences between the CO<sub>2</sub> injectate and reservoir will not affect well integrity. Logging data to assess casing corrosion to be collected during pre-operational testing will be used to ensure the condition of the casing will withstand the operational load associated with maintaining annular fluid and pressure.

The casing specifications in **Table G5-1** are sufficient to meet the requirements of 40 CFR 146.86(b)(1)(iv) and to allow for the safe operation at expected bottom-hole monitoring conditions.

As shown in **Figure G-2**, recent subsidence data demonstrate no appreciable subsidence in the Area of Review (AoR). Therefore, subsidence does not pose a risk to well integrity within the storage project.

### 3.4 *Cement*

Class G Portland cement will be used to cement the well. This cement is widely used in CO<sub>2</sub>-EOR wells and has been demonstrated to have properties that are not deleterious with CO<sub>2</sub>. The cement returns will be to surface for the surface casing. The intermediate casing string will also



be cemented to surface. The long-string casing string will be cemented in place with Class G Portland cement to surface. Subsequently, a CBL will be run to confirm annular isolation throughout and above the injection and confining formations (Section 6).

Cement will be placed using practices standard to the oil and gas industry. A bottom plug will be released ahead of the cement to separate drilling fluid from the cement slurry. The cement will then be pumped down the casing, circulated around the casing shoe and up the annulus toward surface. A top plug will be dropped and displaced with water until the plug bumps at the shoe, confirming full displacement of the cement. This method ensures uniform cement placement and effective zonal isolation. Class G Portland cement will be used, with additives adjusted as needed to achieve the desired density and setting characteristics.

### **3.5     *Tubing and Packer***

The information in **Appendix 5** is representative of completion equipment that will be used and meets the requirements at 40 CFR 146.86(c). Tubing and packer selection and specifications may be modified during pre-operational testing.

**Table G5-2** provides injection tubing specifications as the well will be configured at the time of injection and supports the requirements of 40 CFR 146.86(c). A suitable CRA will be selected and installed once the CO<sub>2</sub> stream impurities and impurity concentrations have been determined. The packer setting depth refers to the center of the element.

### **3.6     *Annular Fluid***

A 4 percent potassium chloride (KCl) completion fluid treated with corrosion inhibitor and biocide will be circulated in the tubing/casing annulus at the time of tubing installation. The corrosion inhibitor and biocide additives will be compatible with the wellbore environment and bottom-hole temperatures to prevent internal corrosion of the long-string casing and external corrosion of the tubing.

### **3.7     *Injectate and Formation Fluid Properties***

Details about the proposed injectate composition and properties can be found in Section 7.2 of **Attachment A: Narrative Report (Attachment A)**. Similarly, the formation fluid composition and properties can be found in Section 2.8.2 of **Attachment A**.

The anticipated injection temperature at the wellhead is 90 to 130°F.

No corrosion is expected in the absence of free-phase water provided that the entrained water is kept in solution with the CO<sub>2</sub>. This is ensured by a <25 lb/mmscf injectate specification limit, and this specification will be a condition of custody transfer at the capture facility. For transport through pipelines, which typically use standard alloy pipeline materials, this specification is critical to the mechanical integrity of the pipeline network, and out of specification product will be immediately rejected. Therefore, all product transported through pipeline to the injection wellhead is expected to be dry-phase CO<sub>2</sub> with no free-phase water present.

Injectate water solubility will vary with depth and time as temperature and pressures change. The water specification is conservative to ensure water solubility across supercritical operating ranges. CRA tubing will be used in the injection wells to mitigate any potential corrosion impact should free-phase water from the reservoir become present in the wellbore, such as during shut-in events when formation liquids, if present, could backflow into the wellbore. CTV may further optimize the maximum water content specification prior to injection based on technical analysis.

Injectate and formation water analysis will be performed during pre-operational testing and reviewed to ensure compatibility with well construction materials.

### **3.8 Alarms and Shut-off Devices**

As described in **Attachment C**, injection wells will be configured with real-time injection rate, injection pressure, and annular pressure monitoring and alarms. **Appendix 4: Operating Procedures (Appendix 4)** details the maximum injection rate and pressure thresholds for alarms and shut-off devices.

A surface shut-off valve will be installed on the wellhead and configured with automation and communication to the Central Control Facility (CCF). The valve will be used by the CCF operator remotely to respond to an emergency by shutting in the well. The valve will be configured to automatically shut-in the well if tubing or annular alarm thresholds are exceeded.

The EPA Preamble to the Class VI Rule states (Federal Register Vol.75, No.237, p.77258): “EPA believes that requiring automatic surface shut-off devices instead of down-hole devices provides more flexibility to owners or operators when performing required mechanical integrity tests. Additionally, this requirement addresses concerns about risks associated with routine well workovers that may be complicated by the presence of down-hole devices while still maintaining USDW protection.” For these reasons, CTV will design the injection well with a surface shut-off valve at the wellhead and not a downhole device.

## **4. Pre-Operational Logging and Testing**

The tests and logs listed in **Table G5-3** will be conducted in accordance with the testing required under 40 CFR 146.87. The methods are described in **Attachment C**. **Table G5-3** summarizes the pre-injection logging data and tests that CTV will acquire during the pre-operational testing and construction phase.

CTV will notify EPA at least 30 days prior to conducting mechanical integrity and formation tests and provide a detailed description of the testing procedure. Notice and the opportunity to witness these tests/logs shall be provided to EPA at least 48 hours in advance of a given test/log.

## **5. Well Operations**

Injection operation conditions are detailed in **Appendix 4**.

## **6. Injection Well Plugging Plan**

CTV will conduct injection well plugging and abandonment according to the procedures below.

### **6.1 *Planned Tests or Measures to Determine Bottom-Hole Reservoir Pressure***

Before beginning the plugging and abandonment process, the pressure used to squeeze the cement will be determined from the bottom-hole pressure gauge. During plugging operations, the weighted cement slurry displacement fluids will be overbalanced to the reservoir pressure ensuring that no reservoir fluids will be able to enter the wellbore during cementing operations.

### **6.2 *Planned External Mechanical Integrity Test(s)***

CTV will conduct at least one external MIT prior to plugging the injection well as required by 40 CFR 146.92(a). A temperature log will be run over the entire depth of each sequestration well (**Table G5-4**). Data from the logging runs will be evaluated for anomalies in the temperature curve, which would be indicative of fluid migration out of the Injection Zone. Data will be compared to the data from temperature logs performed prior to injection of CO<sub>2</sub>. Deviations between the temperature log performed before, after, and during injection may indicate issues related to the integrity of the well casing or cement.

### **6.3 *Information on Plugs***

CTV will use the materials and methods noted in **Table G5-5** to plug the injection well. The cement formulation and required certification documents will be submitted to the agency with the well plugging plan. The owner or operator will report the wet density and will retain duplicate samples of the cement used for each plug.

A standard Portland cement blend with specifications consistent with API Spec 10A will be designed with a minimum 1,000 pounds per square inch (psi) compressive strength and a maximum liquid permeability of 0.1 millidarcies (mD). The properties of this cement blend will be at least equivalent to the properties of Class G Portland cement, and the cement plug will provide an effective, long-term barrier to prevent migration of CO<sub>2</sub> into and within the wellbore. This cement is widely used in CO<sub>2</sub>-EOR wells and has been demonstrated to have properties that are not deleterious with CO<sub>2</sub>.

The wells will have this cement placed as detailed in **Table G5-5**, and all portions of the wellbore that are not plugged with cement will be filled with sufficiently weighted abandonment mud. The cement will be set in plug segments per CTV's standard procedures.

### **6.4 *Notifications, Permits, and Inspections***

In compliance with 40 CFR 146.92(c), CTV will notify the regulatory agency at least 60 days before plugging the well and provide an updated Injection Well Plugging Plan, if applicable.

## 6.5 *Plugging Procedures*

The following plugging procedures are planned assuming a coiled tubing unit (CTU) is used for cement plug placement after all completion equipment is removed. The placement method may vary depending on the type of service equipment used. For instance, a maintenance rig may place the cement plug of same specification at same depths using jointed pipe and achieve the same result.

1. Bottom-hole pressure from downhole pressure gauge is recorded and kill fluid density is calculated.
2. Kill fluid of appropriate density is bullheaded into the wellbore to prevent reservoir fluid inflow and acts as a buffer fluid to flush the wellbore. After at least one wellbore volume of fluid is pumped, the well is observed to ensure static conditions, which is an indication that (1) the weighted fluid is preventing fluid migration into the wellbore and (2) there is no CO<sub>2</sub> in the wellbore. If CO<sub>2</sub> were present in the wellbore, it would migrate to surface due to density difference and expand in volume under decreasing hydrostatic pressure, resulting in non-static (flowing) conditions at surface.
3. Tubulars and downhole equipment are removed from the casing, and the well is cleaned out to total depth during rig operations. Subsequent operations are carried out using a CTU.
4. The CTU runs in the hole to total depth and begins placing cement in the casing. The coiled tubing is kept about 100 feet inside of the cement plug and is pulled uphole while cementing operations continue.
5. Once the full plug is placed, the coiled tubing is pulled above the plug and the well is circulated to ensure the depth of the top of the plug. The tubing is then pulled uphole while operations are paused to wait on cement.
6. Once the cement has set, the coiled tubing is run back in the hole to witness the depth and hardness of the plug before initiating the next cemented plug interval.
7. Abandonment mud is placed between cement plugs while pulling the coiled tubing uphole to the base of the next plug.
8. This process, beginning with step 4, is repeated for each cement plug until cement is placed to surface.

CRC follows the following standards for plugging operations:

- Bottom-hole plug: All perforations shall be plugged with cement, and the plug shall extend at least 100 feet above the top of a landed liner, the uppermost perforations, the casing cementing point, the water shut-off holes, or the oil or gas zone, whichever is highest.
- Base of USDW plug (USDW is defined as a non-exempt aquifer that has <10,000 milligrams per liter [mg/L] total dissolved solids [TDS]):
  - ◊ If there is cement behind the casing across the base of USDW, a 100-foot cement plug shall be placed inside the casing across the interface.

- ◇ If the top of the cement behind the casing is below the base of the USDW, squeeze-cementing shall be required through perforations to protect the freshwater deposits. In addition, a 100-foot cement plug shall be placed inside the casing across the fresh-saltwater interface.
- Surface plug: The casing and all annuli shall be plugged at the surface with at least a 25-foot cement plug.

**Table G5-1. Casing Details**

Name	Depth Interval (feet)	Outside Diameter (inches)	Inside Diameter (inches)	Weight (lb/ft)	Grade (API)	Design Coupling (Short or Long Threaded)	Thermal Conductivity @ 77°F (BTU/ft hr, °F)	Burst Strength (psi)	Collapse Strength (psi)	Tensile Strength (psi)
Conductor	14–54	20	19.124	94	—	—	2.62	—	—	—
Surface	14–800	13.375	12.615	54.5	K-55	Short	2.62	2,730	1,130	853,240
Intermediate	14–3,633	9.625	8.755	43.5	N-80	Long	2.62	6,330	3,810	1,065,350
Long-String	14–4,112 4,112–9,735	7	6.276	26	L-80 L-80 CRA	Long	2.62	7,240	5,410	603,930

Note: Burst pressure is the same as internal pressure, collapse pressure is the same as external pressure, and tensile strength is the same as axial loading.

**Table G5-2. Tubing and Packer Details**

Components	Setting Depth Interval (feet)	Tensile Strength/Rating (lb)	Burst Strength/Rating (psi)	Collapse Strength/Rating (psi)	Material (e.g., weight/grade/connection)
4½-inch tubing	7,873	267,040	7,780	6,350	11.6 lb/ft, L-80 CRA, Premium
Permanent Sealbore Packer	7,843	200,000	7,500	7,500	26-32 lb/ft, CRA

**Table G5-3. Summary of Pre-Operational Logging and Testing**

Data Collection Location(s)	Logging or Testing Activity	Spatial Coverage or Depth
CTVW-1-B2	Deviation checks	Every 120 feet during drilling operations
	Dual Induction Laterolog	During drilling operations
	Spontaneous Potential	During drilling operations
	Gamma Ray	During drilling operations
	Caliper	During drilling operations
	Compensated Neutron	During drilling operations
	Formation Density	During drilling operations
	Mud Log	During drilling operations
	Cement Bond Log	Along all casing strings to surface
	Casing Inspection Log	Along the long-string casing to surface
	Internal MIT: SAPT	Casing/tubing annulus above packer
	External MIT (at least one of): Oxygen Activation Log Noise Log	Along the long-string casing to surface
	Injectivity Test	Injection Zone
	Pressure Fall-off Testing	Injection Zone

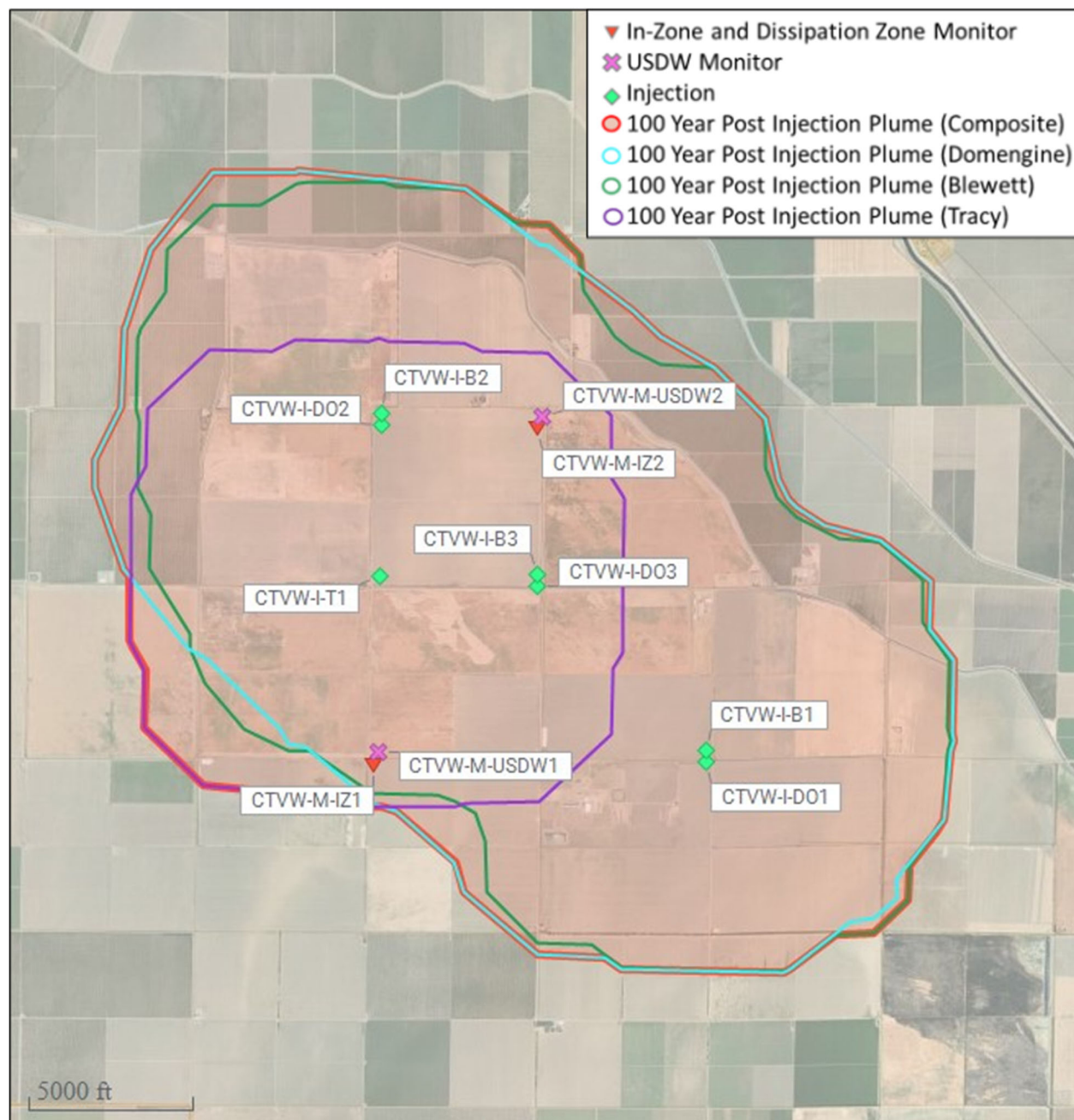
**Table G5-4. Planned MITs**

Test Description	Location
Temperature	Entire length of the sequestration well

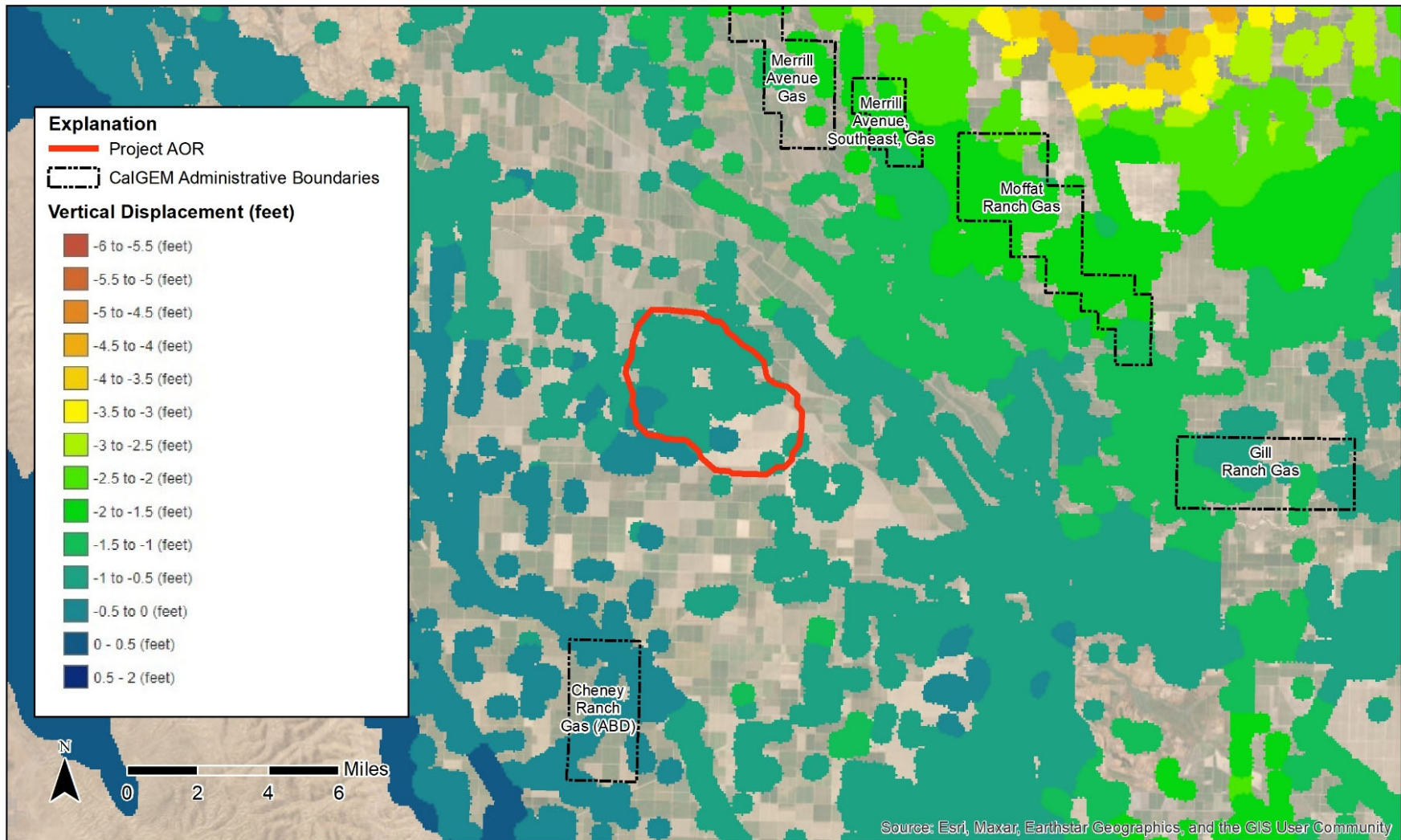
**Table G5-5. Plugging Details**

Plug Information	Plug #1	Plug #2	Plug #3	Plug #4	Plug #5	Plug #6
Diameter of boring in which plug will be placed (inches)	6.276	6.276	6.276	6.276	6.276	6.276
Depth to bottom of tubing or drill pipe (feet)	9,641	8,852	5,707	3,689	3,558	39
Sacks of cement to be used (each plug)	88	194	242	23	23	10
Slurry volume to be pumped (bbl)	18.02	39.73	49.56	4.71	4.71	2.05
Slurry weight (lb/gal)	15.8	15.8	15.8	15.8	15.8	15.8
Calculated top of plug (feet)	9,169	7,813	4,412	3,564	3,433	14
Bottom of plug (feet)	9,641	8,852	5,707	3,689	3,558	39
Type of cement or other material	Class G	Class G	Class G	Class G	Class G	Class G
Method of emplacement (e.g., balance method, retainer method, or two-plug method)	Balanced Plug, Retainer, or CT Plug					





**Figure G-1. Locations of Injection Wells and Monitoring Wells.**



**Figure G-2. Subsidence in the Area of Review.** Subsidence is -1 to 0 feet for June 2015 to July 2022. Vertical displacement data for subsidence analysis are from the Sustainable Groundwater Management Act Data Viewer (<https://sgma.water.ca.gov/>).

**ATTACHMENT G6: INJECTOR CTVW-I-B3  
CONSTRUCTION AND PLUGGING PLAN  
40 CFR 146.86, 146.92  
CTV VI**

**Document Version History**

Version	Revision Date	File Name	Description of Change
1	7/31/2024	CP_CTVW-I-B3	Original Submission
2	11/21/2025	Att G6 - CP - Inj - CTVW-I-B3_v2	Response to EPA comments received August 21, 2025

**1. Facility Information**

Facility Name: CTV VI

Facility Contact: Faisal Latif, Storage Development Manager  
(661) 763-6274, faisal.latif@crc.com

Well Location: 36.82215533, -120.5308907

**2. Introduction**

Carbon Terra Vault Holdings, LLC (CTV) intends to drill seven new carbon dioxide (CO<sub>2</sub>) injection wells for CO<sub>2</sub> injection for the CTV VI storage project. **Figure G-1** identifies the wells proposed for the project.

All planned new wells will be constructed with components that are compatible with the injectate and formation fluids encountered such that corrosion rates and cumulative corrosion over the duration of the project are acceptable. The proposed well materials will be confirmed based on actual CO<sub>2</sub> composition such that material strength is sufficient to withstand all loads encountered throughout the life of the well with an acceptable safety factor incorporated into the design. Casing points will be verified by trained geologists using real-time drilling data such as logging while drilling (LWD) and mud logs to ensure protection of shallow formations. Due to the depth of the base of lowermost underground source of drinking water (USDW), a dedicated casing string will be used to isolate and protect the USDW. Cementing design, additives, and placement procedures will be sufficient to ensure isolation of the Injection Zone and protection of shallow formations using cementing materials that are compatible with injectate, formation fluids, and subsurface pressure and temperature conditions.

**Appendix 5: Injection and Monitoring Well Schematics (Appendix 5)** provides casing diagram figures for all injection and monitoring wells with construction specifications and anticipated completion details in graphical and/or tabular format.

### 3. Construction Details

#### 3.1 *Injectate Migration Prevention and Protection of the USDW*

New well construction will occur during the pre-operational testing phase, and no abnormal drilling and completion challenges are anticipated. The drilling histories of nearby wells provide key information to drilling professionals and identify the expected conditions to be encountered. The wells will be constructed with objectives to achieve target CO<sub>2</sub> injection rates, to prevent migration of fluids out of the injection zones, to protect USDWs and the shallow formations, and to allow for monitoring, as described by the following:

- Well designs will be sufficient to withstand all anticipated load cases including safety factors.
- Multiple cemented casing strings will protect shallow USDW-bearing zones from contacting injection fluid within the production tubing.
- All casing strings will be cemented in place using industry-proven recommended practices for slurry design and placement. The surface casing will be cemented with cement returns to surface. The intermediate and long-string casing will be cemented with a theoretical volume to surface.
- Cement bond logging (CBL) will be used to verify presence of cement in the production casing annulus through and above the confining layer.
- Mechanical integrity testing (MIT) will be performed on the tubing and the tubing/casing annulus.
- Upper completion design (injection tubulars, packer, and wellhead) enables monitoring devices to be installed downhole, cased hole logs to be acquired, samples to be obtained, and MIT to be conducted.
- Standard annular pressure tests (SAPTs) demonstrate that the long string casing, tubing, packer and wellhead have mechanical integrity. Internal MIT will be performed before the start of injection and any time the packer is reset to demonstrate isolation and integrity of primary barriers (tubing, packer, wellhead) and secondary barriers (casing, wellhead) for the protection of potential USDW.
- Real-time surface monitoring equipment with remote connectivity to a centralized facility and alarms provides continual awareness to potential anomalous injection conditions.
- Annular fluid (packer fluid) density and additives to mitigate corrosion provide additional protection against mechanical or chemical failure of production casing and upper completion equipment.

The injection well will be constructed using industry standards and recommended practices. Existing and future well materials comply with the following specifications:

- API Spec 5CT / ISO 11960 – Specifications for Casing and Tubing
- API Spec 5CRA / ISO 13680 – Specification for Corrosion-Resistant Alloy Seamless Tubes for use as Casing, Tubing, and Coupling Stock

- API Spec 10A / ISO 10426-1 – Cements and Materials for Cementing
- API Spec 11D1 / ISO 14310 – Downhole Equipment – Packers and Bridge Plugs
- API Spec 6A / ISO 10423 – Specification for Wellhead and Tree Equipment

### 3.2 *Materials*

Well materials used will be compatible with the CO<sub>2</sub> injectate to prevent the loss of mechanical integrity in the well:

- Tubing: Corrosion-resistant alloy (CRA) consistent with accepted industry practices for corrosion mitigation based on a mixture of formation fluids and injectates.
- Wellhead: Stainless steel or other material consistent with accepted industry practices for corrosion mitigation based on injected CO<sub>2</sub> specification.
- Packer: CRA or coating and hardened rubber elastomer element material.
- Casing: Standard N-80 casing will be installed to be compatible with the CO<sub>2</sub> injectate and verified through corrosion coupon monitoring as discussed in **Attachment C: Testing and Monitoring Plan (Attachment C)**.
- Cement: Portland cement has been used extensively in enhanced oil recovery (EOR) producers for decades. Data acquired from existing wells supports that the cement is compatible with CO<sub>2</sub> where good cement bond between formation and casing exists.

### 3.3 *Casing*

The Injection Zone is neither significantly depleted nor overpressured, and formation temperature ranges from 135 to 192°F, from the shallowest (Domengine) to the deepest (Tracy) formations that make up the Injection Zone. These conditions are not extreme, and normal cementing and casing practices meet standards. Temperature differences between the CO<sub>2</sub> injectate and reservoir will not affect well integrity. Logging data to assess casing corrosion to be collected during pre-operational testing will be used to ensure the condition of the casing will withstand the operational load associated with maintaining annular fluid and pressure.

The casing specifications in **Table G6-1** are sufficient to meet the requirements of 40 CFR 146.86(b)(1)(iv) and to allow for the safe operation at expected bottom-hole monitoring conditions.

As shown in **Figure G-2**, recent subsidence data demonstrate no appreciable subsidence in the Area of Review (AoR). Therefore, subsidence does not pose a risk to well integrity within the storage project.

### 3.4 *Cement*

Class G Portland cement will be used to cement the well. This cement is widely used in CO<sub>2</sub>-EOR wells and has been demonstrated to have properties that are not deleterious with CO<sub>2</sub>. The cement returns will be to surface for the surface casing. The intermediate casing string will also

be cemented to surface. The long-string casing string will be cemented in place with Class G Portland cement to surface. Subsequently, a CBL will be run to confirm annular isolation throughout and above the injection and confining formations (Section 6).

Cement will be placed using practices standard to the oil and gas industry. A bottom plug will be released ahead of the cement to separate drilling fluid from the cement slurry. The cement will then be pumped down the casing, circulated around the casing shoe and up the annulus toward surface. A top plug will be dropped and displaced with water until the plug bumps at the shoe, confirming full displacement of the cement. This method ensures uniform cement placement and effective zonal isolation. Class G Portland cement will be used, with additives adjusted as needed to achieve the desired density and setting characteristics.

### **3.5     *Tubing and Packer***

The information in **Appendix 5** is representative of completion equipment that will be used and meets the requirements at 40 CFR 146.86(c). Tubing and packer selection and specifications may be modified during pre-operational testing.

**Table G6-2** provides injection tubing specifications as the well will be configured at the time of injection and supports the requirements of 40 CFR 146.86(c). A suitable CRA will be selected and installed once the CO<sub>2</sub> stream impurities and impurity concentrations have been determined. The packer setting depth refers to the center of the element.

### **3.6     *Annular Fluid***

A 4 percent potassium chloride (KCl) completion fluid treated with corrosion inhibitor and biocide will be circulated in the tubing/casing annulus at the time of tubing installation. The corrosion inhibitor and biocide additives will be compatible with the wellbore environment and bottom-hole temperatures to prevent internal corrosion of the long-string casing and external corrosion of the tubing.

### **3.7     *Injectate and Formation Fluid Properties***

Details about the proposed injectate composition and properties can be found in Section 7.2 of **Attachment A: Narrative Report (Attachment A)**. Similarly, the formation fluid composition and properties can be found in Section 2.8.2 of **Attachment A**.

The anticipated injection temperature at the wellhead is 90 to 130°F.

No corrosion is expected in the absence of free-phase water provided that the entrained water is kept in solution with the CO<sub>2</sub>. This is ensured by a <25 lb/mmscf injectate specification limit, and this specification will be a condition of custody transfer at the capture facility. For transport through pipelines, which typically use standard alloy pipeline materials, this specification is critical to the mechanical integrity of the pipeline network, and out of specification product will be immediately rejected. Therefore, all product transported through pipeline to the injection wellhead is expected to be dry-phase CO<sub>2</sub> with no free-phase water present.



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As described in **Attachment C**, injection wells will be configured with real-time injection rate, injection pressure, and annular pressure monitoring and alarms. **Appendix 4: Operating Procedures (Appendix 4)** details the maximum injection rate and pressure thresholds for alarms and shut-off devices.

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Injection operation conditions are detailed in **Appendix 4**.

## **6. Injection Well Plugging Plan**

CTV will conduct injection well plugging and abandonment according to the procedures below.

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Before beginning the plugging and abandonment process, the pressure used to squeeze the cement will be determined from the bottom-hole pressure gauge. During plugging operations, the weighted cement slurry displacement fluids will be overbalanced to the reservoir pressure ensuring that no reservoir fluids will be able to enter the wellbore during cementing operations.

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CTV will use the materials and methods noted in **Table G6-5** to plug the injection well. The cement formulation and required certification documents will be submitted to the agency with the well plugging plan. The owner or operator will report the wet density and will retain duplicate samples of the cement used for each plug.

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The wells will have this cement placed as detailed in **Table G6-5**, and all portions of the wellbore that are not plugged with cement will be filled with sufficiently weighted abandonment mud. The cement will be set in plug segments per CTV's standard procedures.

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In compliance with 40 CFR 146.92(c), CTV will notify the regulatory agency at least 60 days before plugging the well and provide an updated Injection Well Plugging Plan, if applicable.



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3. Tubulars and downhole equipment are removed from the casing, and the well is cleaned out to total depth during rig operations. Subsequent operations are carried out using a CTU.
4. The CTU runs in the hole to total depth and begins placing cement in the casing. The coiled tubing is kept about 100 feet inside of the cement plug and is pulled uphole while cementing operations continue.
5. Once the full plug is placed, the coiled tubing is pulled above the plug and the well is circulated to ensure the depth of the top of the plug. The tubing is then pulled uphole while operations are paused to wait on cement.
6. Once the cement has set, the coiled tubing is run back in the hole to witness the depth and hardness of the plug before initiating the next cemented plug interval.
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Name	Depth Interval (feet)	Outside Diameter (inches)	Inside Diameter (inches)	Weight (lb/ft)	Grade (API)	Design Coupling (Short or Long Threaded)	Thermal Conductivity @ 77°F (BTU/ft hr, °F)	Burst Strength (psi)	Collapse Strength (psi)	Tensile Strength (psi)
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Note: Burst pressure is the same as internal pressure, collapse pressure is the same as external pressure, and tensile strength is the same as axial loading.

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Components	Setting Depth Interval (feet)	Tensile Strength/Rating (lb)	Burst Strength/Rating (psi)	Collapse Strength/Rating (psi)	Material (e.g., weight/grade/connection)
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Permanent Sealbore Pakcer	8,032	200,000	7,500	7,500	26-32 lb/ft, CRA

**Table G6-3. Summary of Pre-Operational Logging and Testing**

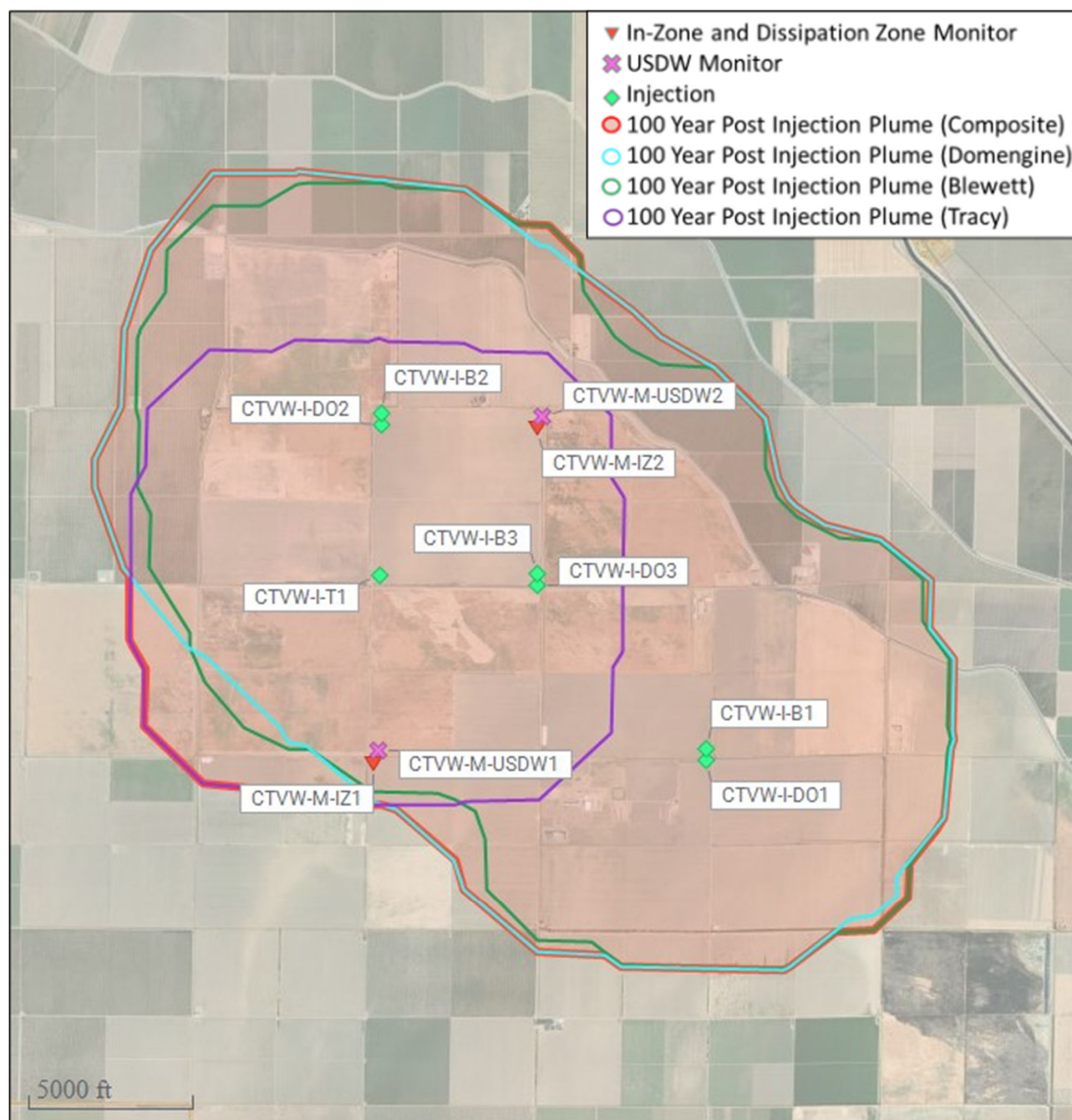
Data Collection Location(s)	Logging or Testing Activity	Spatial Coverage or Depth
CTVW-I-B3	Deviation checks	Every 120 feet during drilling operations
	Dual Induction Laterolog	During drilling operations
	Spontaneous Potential	During drilling operations
	Gamma Ray	During drilling operations
	Caliper	During drilling operations
	Compensated Neutron	During drilling operations
	Formation Density	During drilling operations
	Mud Log	During drilling operations
	Cement Bond Log	Along all casing strings to surface
	Casing Inspection Log	Along the long-string casing to surface
	Internal MIT: SAPT	Casing/tubing annulus above packer
	External MIT (at least one of): Oxygen Activation Log Noise Log	Along the long-string casing to surface
	Injectivity Test	Injection Zone
	Pressure Fall-off Testing	Injection Zone

**Table G6-4. Planned MITs**

Test Description	Location
Temperature	Entire length of the sequestration well

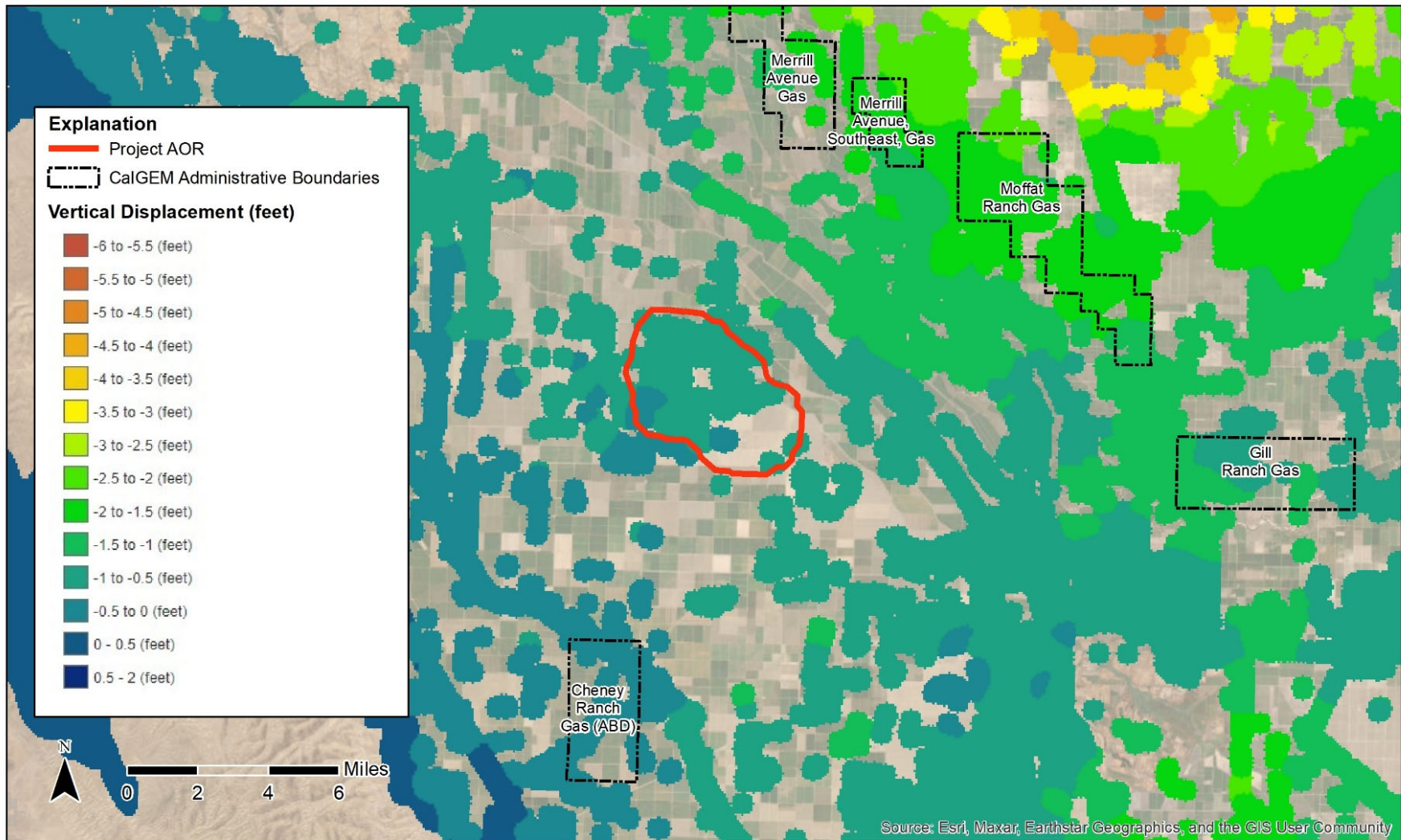
**Table G6-5. Plugging Details**

Plug Information	Plug #1	Plug #2	Plug #3	Plug #4	Plug #5	Plug #6
Diameter of boring in which plug will be placed (inches)	6.276	6.276	6.276	6.276	6.276	6.276
Depth to bottom of tubing or drill pipe (feet)	9,663	8,905	5,754	3,818	3,674	39
Sacks of cement to be used (each plug)	65	169	235	23	23	10
Slurry volume to be pumped (bbl)	13.31	34.61	48.13	4.71	4.71	2.05
Slurry weight (lb/gal)	15.8	15.8	15.8	15.8	15.8	15.8
Calculated top of plug (feet)	9,315	8,002	4,494	3,693	3,549	14
Bottom of plug (feet)	9,663	8,905	5,754	3,818	3,674	39
Type of cement or other material	Class G	Class G	Class G	Class G	Class G	Class G
Method of emplacement (e.g., balance method, retainer method, or two-plug method)	Balanced Plug, Retainer, or CT Plug					



**Figure G-1. Locations of Injection Wells and Monitoring Wells.**





**Figure G-2. Subsidence in the Area of Review.** Subsidence is -1 to 0 feet for June 2015 to July 2022. Vertical displacement data for subsidence analysis are from the Sustainable Groundwater Management Act Data Viewer (<https://sgma.water.ca.gov/>).

**ATTACHMENT G7: INJECTOR CTVW-I-T1  
CONSTRUCTION AND PLUGGING PLAN  
40 CFR 146.86, 146.92  
CTV VI**

**Document Version History**

Version	Revision Date	File Name	Description of Change
1	7/31/2024	CP_CTVW-I-T1	Original Submission
2	11/21/2025	Att G7 - CP - Inj - CTVW-I-T1_v2	Response to EPA comments received August 21, 2025

**1. Facility Information**

Facility Name: CTV VI

Facility Contact: Faisal Latif, Storage Development Manager  
(661) 763-6274, faisal.latif@crc.com

Well Location: 36.82251043, -120.547504253

**2. Introduction**

Carbon Terra Vault Holdings, LLC (CTV) intends to drill seven new carbon dioxide (CO<sub>2</sub>) injection wells for CO<sub>2</sub> injection for the CTV VI storage project. **Figure G-1** identifies the wells proposed for the project.

All planned new wells will be constructed with components that are compatible with the injectate and formation fluids encountered such that corrosion rates and cumulative corrosion over the duration of the project are acceptable. The proposed well materials will be confirmed based on actual CO<sub>2</sub> composition such that material strength is sufficient to withstand all loads encountered throughout the life of the well with an acceptable safety factor incorporated into the design. Casing points will be verified by trained geologists using real-time drilling data such as logging while drilling (LWD) and mud logs to ensure protection of shallow formations. Due to the depth of the base of lowermost underground source of drinking water (USDW), a dedicated casing string will be used to isolate and protect the USDW. Cementing design, additives, and placement procedures will be sufficient to ensure isolation of the Injection Zone and protection of shallow formations using cementing materials that are compatible with injectate, formation fluids, and subsurface pressure and temperature conditions.

**Appendix 5: Injection and Monitoring Well Schematics (Appendix 5)** provides casing diagram figures for all injection and monitoring wells with construction specifications and anticipated completion details in graphical and/or tabular format.



### 3. Construction Details

#### 3.1 *Injectate Migration Prevention and Protection of the USDW*

New well construction will occur during the pre-operational testing phase, and no abnormal drilling and completion challenges are anticipated. The drilling histories of nearby wells provide key information to drilling professionals and identify the expected conditions to be encountered. The wells will be constructed with objectives to achieve target CO<sub>2</sub> injection rates, to prevent migration of fluids out of the injection zones, to protect USDWs and the shallow formations, and to allow for monitoring, as described by the following:

- Well designs will be sufficient to withstand all anticipated load cases including safety factors.
- Multiple cemented casing strings will protect shallow USDW-bearing zones from contacting injection fluid within the production tubing.
- All casing strings will be cemented in place using industry-proven recommended practices for slurry design and placement. The surface casing will be cemented with cement returns to surface. The intermediate and long-string casing will be cemented with a theoretical volume to surface.
- Cement bond logging (CBL) will be used to verify presence of cement in the production casing annulus through and above the confining layer.
- Mechanical integrity testing (MIT) will be performed on the tubing and the tubing/casing annulus.
- Upper completion design (injection tubulars, packer, and wellhead) enables monitoring devices to be installed downhole, cased hole logs to be acquired, samples to be obtained, and MIT to be conducted.
- Standard annular pressure tests (SAPTs) demonstrate that the long string casing, tubing, packer and wellhead have mechanical integrity. Internal MIT will be performed before the start of injection and any time the packer is reset to demonstrate isolation and integrity of primary barriers (tubing, packer, wellhead) and secondary barriers (casing, wellhead) for the protection of potential USDW.
- Real-time surface monitoring equipment with remote connectivity to a centralized facility and alarms provides continual awareness to potential anomalous injection conditions.
- Annular fluid (packer fluid) density and additives to mitigate corrosion provide additional protection against mechanical or chemical failure of production casing and upper completion equipment.

The injection well will be constructed using industry standards and recommended practices. Existing and future well materials comply with the following specifications:

- API Spec 5CT / ISO 11960 – Specifications for Casing and Tubing
- API Spec 5CRA / ISO 13680 – Specification for Corrosion-Resistant Alloy Seamless Tubes for use as Casing, Tubing, and Coupling Stock

- API Spec 10A / ISO 10426-1 – Cements and Materials for Cementing
- API Spec 11D1 / ISO 14310 – Downhole Equipment – Packers and Bridge Plugs
- API Spec 6A / ISO 10423 – Specification for Wellhead and Tree Equipment

### 3.2 *Materials*

Well materials used will be compatible with the CO<sub>2</sub> injectate to prevent the loss of mechanical integrity in the well:

- Tubing: Corrosion-resistant alloy (CRA) consistent with accepted industry practices for corrosion mitigation based on a mixture of formation fluids and injectates.
- Wellhead: Stainless steel or other material consistent with accepted industry practices for corrosion mitigation based on injected CO<sub>2</sub> specification.
- Packer: CRA or coating and hardened rubber elastomer element material.
- Casing: Standard N-80 casing will be installed to be compatible with the CO<sub>2</sub> injectate and verified through corrosion coupon monitoring as discussed in **Attachment C: Testing and Monitoring Plan (Attachment C)**.
- Cement: Portland cement has been used extensively in enhanced oil recovery (EOR) producers for decades. Data acquired from existing wells supports that the cement is compatible with CO<sub>2</sub> where good cement bond between formation and casing exists.

### 3.3 *Casing*

The Injection Zone is neither significantly depleted nor overpressured, and formation temperature ranges from 135 to 192°F, from the shallowest (Domengine) to the deepest (Tracy) formations that make up the Injection Zone. These conditions are not extreme, and normal cementing and casing practices meet standards. Temperature differences between the CO<sub>2</sub> injectate and reservoir will not affect well integrity. Logging data to assess casing corrosion to be collected during pre-operational testing will be used to ensure the condition of the casing will withstand the operational load associated with maintaining annular fluid and pressure.

The casing specifications in **Table G7-1** are sufficient to meet the requirements of 40 CFR 146.86(b)(1)(iv) and to allow for the safe operation at expected bottom-hole monitoring conditions.

As shown in **Figure G-2**, recent subsidence data demonstrate no appreciable subsidence in the Area of Review (AoR). Therefore, subsidence does not pose a risk to well integrity within the storage project.

### 3.4 *Cement*

Class G Portland cement will be used to cement the well. This cement is widely used in CO<sub>2</sub>-EOR wells and has been demonstrated to have properties that are not deleterious with CO<sub>2</sub>. The cement returns will be to surface for the surface casing. The intermediate casing string will also

be cemented to surface. The long-string casing string will be cemented in place with Class G Portland cement to surface. Subsequently, a CBL will be run to confirm annular isolation throughout and above the injection and confining formations (Section 6).

Cement will be placed using practices standard to the oil and gas industry. A bottom plug will be released ahead of the cement to separate drilling fluid from the cement slurry. The cement will then be pumped down the casing, circulated around the casing shoe and up the annulus toward surface. A top plug will be dropped and displaced with water until the plug bumps at the shoe, confirming full displacement of the cement. This method ensures uniform cement placement and effective zonal isolation. Class G Portland cement will be used, with additives adjusted as needed to achieve the desired density and setting characteristics.

### **3.5     *Tubing and Packer***

The information in **Appendix 5** is representative of completion equipment that will be used and meets the requirements at 40 CFR 146.86(c). Tubing and packer selection and specifications may be modified during pre-operational testing.

**Table G7-2** provides injection tubing specifications as the well will be configured at the time of injection and supports the requirements of 40 CFR 146.86(c). A suitable CRA will be selected and installed once the CO<sub>2</sub> stream impurities and impurity concentrations have been determined. The packer setting depth refers to the center of the element.

### **3.6     *Annular Fluid***

A 4 percent potassium chloride (KCl) completion fluid treated with corrosion inhibitor and biocide will be circulated in the tubing/casing annulus at the time of tubing installation. The corrosion inhibitor and biocide additives will be compatible with the wellbore environment and bottom-hole temperatures to prevent internal corrosion of the long-string casing and external corrosion of the tubing.

### **3.7     *Injectate and Formation Fluid Properties***

Details about the proposed injectate composition and properties can be found in Section 7.2 of **Attachment A: Narrative Report (Attachment A)**. Similarly, the formation fluid composition and properties can be found in Section 2.8.2 of **Attachment A**.

The anticipated injection temperature at the wellhead is 90 to 130°F.

No corrosion is expected in the absence of free-phase water provided that the entrained water is kept in solution with the CO<sub>2</sub>. This is ensured by a <25 lb/mmscf injectate specification limit, and this specification will be a condition of custody transfer at the capture facility. For transport through pipelines, which typically use standard alloy pipeline materials, this specification is critical to the mechanical integrity of the pipeline network, and out of specification product will be immediately rejected. Therefore, all product transported through pipeline to the injection wellhead is expected to be dry-phase CO<sub>2</sub> with no free-phase water present.

Injectate water solubility will vary with depth and time as temperature and pressures change. The water specification is conservative to ensure water solubility across supercritical operating ranges. CRA tubing will be used in the injection wells to mitigate any potential corrosion impact should free-phase water from the reservoir become present in the wellbore, such as during shut-in events when formation liquids, if present, could backflow into the wellbore. CTV may further optimize the maximum water content specification prior to injection based on technical analysis.

Injectate and formation water analysis will be performed during pre-operational testing and reviewed to ensure compatibility with well construction materials.

### **3.8 Alarms and Shut-off Devices**

As described in **Attachment C**, injection wells will be configured with real-time injection rate, injection pressure, and annular pressure monitoring and alarms. **Appendix 4: Operating Procedures (Appendix 4)** details the maximum injection rate and pressure thresholds for alarms and shut-off devices.

A surface shut-off valve will be installed on the wellhead and configured with automation and communication to the Central Control Facility (CCF). The valve will be used by the CCF operator remotely to respond to an emergency by shutting in the well. The valve will be configured to automatically shut-in the well if tubing or annular alarm thresholds are exceeded.

The EPA Preamble to the Class VI Rule states (Federal Register Vol.75, No.237, p.77258): “EPA believes that requiring automatic surface shut-off devices instead of down-hole devices provides more flexibility to owners or operators when performing required mechanical integrity tests. Additionally, this requirement addresses concerns about risks associated with routine well workovers that may be complicated by the presence of down-hole devices while still maintaining USDW protection.” For these reasons, CTV will design the injection well with a surface shut-off valve at the wellhead and not a downhole device.

## **4. Pre-Operational Logging and Testing**

The tests and logs listed in **Table G7-3** will be conducted in accordance with the testing required under 40 CFR 146.87. The methods are described in **Attachment C**. **Table G7-3** summarizes the pre-injection logging data and tests that CTV will acquire during the pre-operational testing and construction phase.

CTV will notify EPA at least 30 days prior to conducting mechanical integrity and formation tests and provide a detailed description of the testing procedure. Notice and the opportunity to witness these tests/logs shall be provided to EPA at least 48 hours in advance of a given test/log.

## **5. Well Operations**

Injection operation conditions are detailed in **Appendix 4**.

## **6. Injection Well Plugging Plan**

CTV will conduct injection well plugging and abandonment according to the procedures below.

### **6.1 *Planned Tests or Measures to Determine Bottom-Hole Reservoir Pressure***

Before beginning the plugging and abandonment process, the pressure used to squeeze the cement will be determined from the bottom-hole pressure gauge. During plugging operations, the weighted cement slurry displacement fluids will be overbalanced to the reservoir pressure ensuring that no reservoir fluids will be able to enter the wellbore during cementing operations.

### **6.2 *Planned External Mechanical Integrity Test(s)***

CTV will conduct at least one external MIT prior to plugging the injection well as required by 40 CFR 146.92(a). A temperature log will be run over the entire depth of each sequestration well (**Table G7-4**). Data from the logging runs will be evaluated for anomalies in the temperature curve, which would be indicative of fluid migration out of the Injection Zone. Data will be compared to the data from temperature logs performed prior to injection of CO<sub>2</sub>. Deviations between the temperature log performed before, after, and during injection may indicate issues related to the integrity of the well casing or cement.

### **6.3 *Information on Plugs***

CTV will use the materials and methods noted in **Table G7-5** to plug the injection well. The cement formulation and required certification documents will be submitted to the agency with the well plugging plan. The owner or operator will report the wet density and will retain duplicate samples of the cement used for each plug.

A standard Portland cement blend with specifications consistent with API Spec 10A will be designed with a minimum 1,000 pounds per square inch (psi) compressive strength and a maximum liquid permeability of 0.1 millidarcies (mD). The properties of this cement blend will be at least equivalent to the properties of Class G Portland cement, and the cement plug will provide an effective, long-term barrier to prevent migration of CO<sub>2</sub> into and within the wellbore. This cement is widely used in CO<sub>2</sub>-EOR wells and has been demonstrated to have properties that are not deleterious with CO<sub>2</sub>.

The wells will have this cement placed as detailed in **Table G7-5**, and all portions of the wellbore that are not plugged with cement will be filled with sufficiently weighted abandonment mud. The cement will be set in plug segments per CTV's standard procedures.

### **6.4 *Notifications, Permits, and Inspections***

In compliance with 40 CFR 146.92(c), CTV will notify the regulatory agency at least 60 days before plugging the well and provide an updated Injection Well Plugging Plan, if applicable.

## 6.5 *Plugging Procedures*

The following plugging procedures are planned assuming a coiled tubing unit (CTU) is used for cement plug placement after all completion equipment is removed. The placement method may vary depending on the type of service equipment used. For instance, a maintenance rig may place the cement plug of same specification at same depths using jointed pipe and achieve the same result.

1. Bottom-hole pressure from downhole pressure gauge is recorded and kill fluid density is calculated.
2. Kill fluid of appropriate density is bullheaded into the wellbore to prevent reservoir fluid inflow and acts as a buffer fluid to flush the wellbore. After at least one wellbore volume of fluid is pumped, the well is observed to ensure static conditions, which is an indication that (1) the weighted fluid is preventing fluid migration into the wellbore and (2) there is no CO<sub>2</sub> in the wellbore. If CO<sub>2</sub> were present in the wellbore, it would migrate to surface due to density difference and expand in volume under decreasing hydrostatic pressure, resulting in non-static (flowing) conditions at surface.
3. Tubulars and downhole equipment are removed from the casing, and the well is cleaned out to total depth during rig operations. Subsequent operations are carried out using a CTU.
4. The CTU runs in the hole to total depth and begins placing cement in the casing. The coiled tubing is kept about 100 feet inside of the cement plug and is pulled uphole while cementing operations continue.
5. Once the full plug is placed, the coiled tubing is pulled above the plug and the well is circulated to ensure the depth of the top of the plug. The tubing is then pulled uphole while operations are paused to wait on cement.
6. Once the cement has set, the coiled tubing is run back in the hole to witness the depth and hardness of the plug before initiating the next cemented plug interval.
7. Abandonment mud is placed between cement plugs while pulling the coiled tubing uphole to the base of the next plug.
8. This process, beginning with step 4, is repeated for each cement plug until cement is placed to surface.

CRC follows the following standards for plugging operations:

- Bottom-hole plug: All perforations shall be plugged with cement, and the plug shall extend at least 100 feet above the top of a landed liner, the uppermost perforations, the casing cementing point, the water shut-off holes, or the oil or gas zone, whichever is highest.
- Base of USDW plug (USDW is defined as a non-exempt aquifer that has <10,000 milligrams per liter [mg/L] total dissolved solids [TDS]):
  - ◊ If there is cement behind the casing across the base of USDW, a 100-foot cement plug shall be placed inside the casing across the interface.

- ◇ If the top of the cement behind the casing is below the base of the USDW, squeeze-cementing shall be required through perforations to protect the freshwater deposits. In addition, a 100-foot cement plug shall be placed inside the casing across the fresh-saltwater interface.
- Surface plug: The casing and all annuli shall be plugged at the surface with at least a 25-foot cement plug.

**Table G7-1. Casing Details**

Name	Depth Interval (feet)	Outside Diameter (inches)	Inside Diameter (inches)	Weight (lb/ft)	Grade (API)	Design Coupling (Short or Long Threaded)	Thermal Conductivity @ 77°F (BTU/ft hr, °F)	Burst Strength (psi)	Collapse Strength (psi)	Tensile Strength (psi)
Conductor	14–54	20	19.124	94	—	—	2.62	—	—	—
Surface	14–800	13.375	12.615	54.5	K-55	Short	2.62	2,730	1,130	853,240
Intermediate	14–3,612	9.625	8.755	43.5	N-80	Long	2.62	6,330	3,810	1,065,350
Long-string	14–4,116 4,116–9,698	7	6.276	26	L-80 L-80 CRA	Long	2.62	7,240	5,410	603,930

Note: Burst pressure is the same as internal pressure, collapse pressure is the same as external pressure, and tensile strength is the same as axial loading.

**Table G7-2. Tubing and Packer Details**

Components	Setting Depth Interval (feet)	Tensile Strength/Rating (lb)	Burst Strength/Rating (psi)	Collapse Strength/Rating (psi)	Material (e.g., weight/grade/connection)
4½-inch tubing	9,229	267,040	7,780	6,350	11.6 lb/ft, L80 CRA, Premium
Permanent sealbore packer	9,199	200,000	7,500	7,500	26-32 lb/ft, CRA



**Table G7-3. Summary of Pre-Operational Logging and Testing**

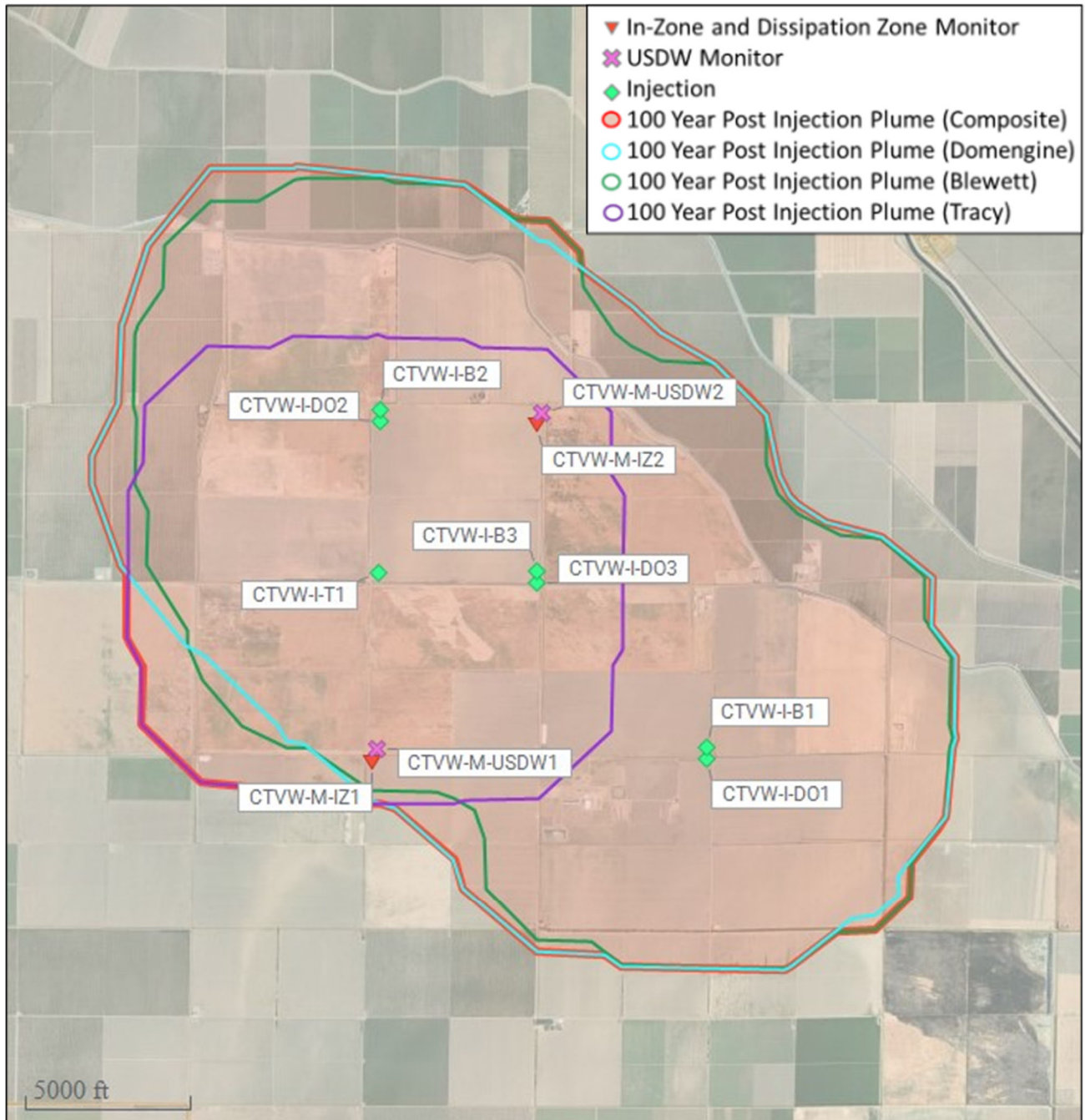
Data Collection Location(s)	Logging or Testing Activity	Spatial Coverage or Depth
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	Injectivity Test	Injection Zone
	Pressure Fall-off Testing	Injection Zone

**Table G7-4. Planned MITs**

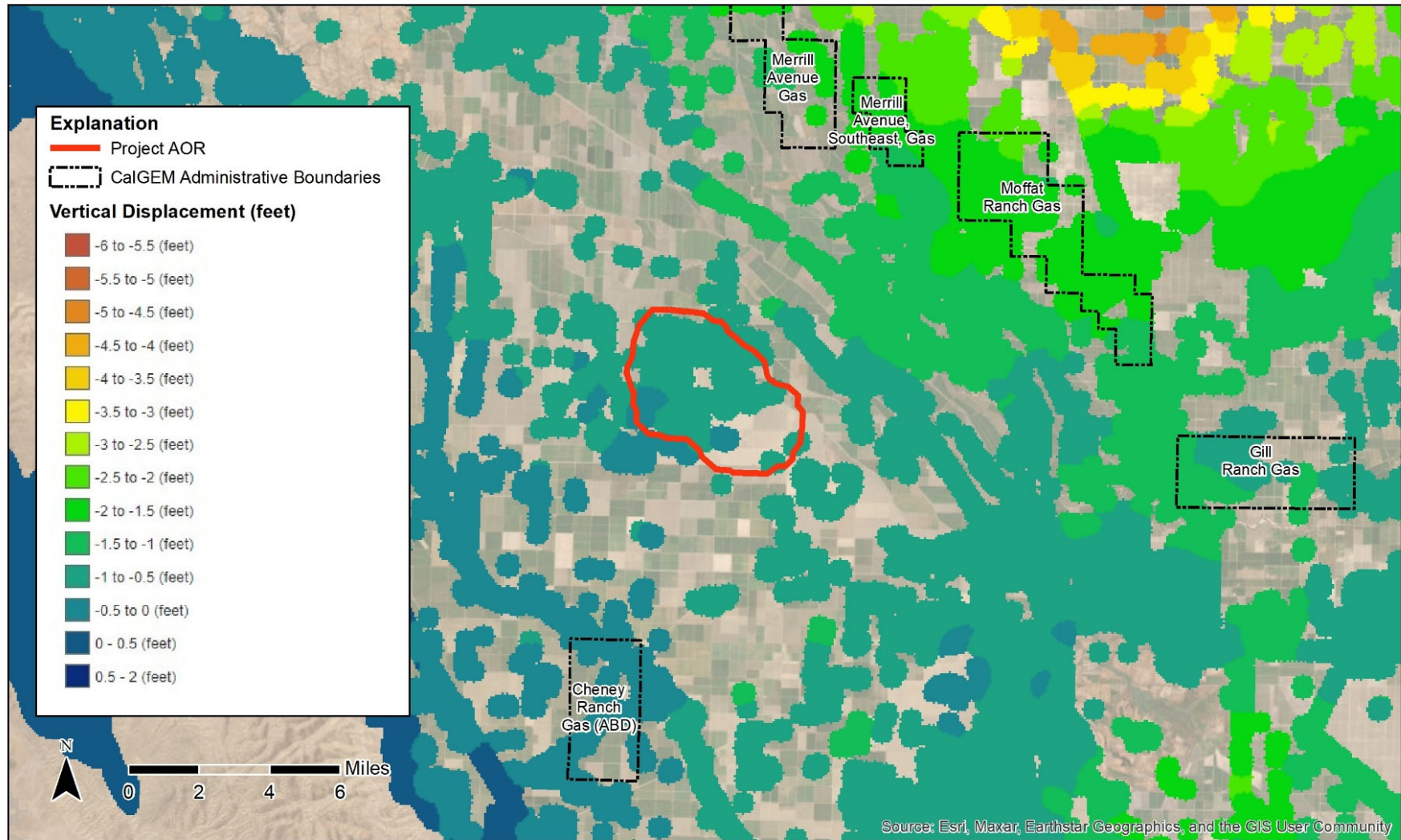
Test Description	Location
Temperature	Entire length of the sequestration well

**Table G7-5. Plugging Details**

Plug Information	Plug #1	Plug #2	Plug #3	Plug #4	Plug #5	Plug #6
Diameter of boring in which plug will be placed (inches)	6.276	6.276	6.276	6.276	6.276	6.276
Depth to bottom of tubing or drill pipe (feet)	9,604	7,632	5,131	3,933	2,138	39
Sacks of cement to be used (each plug)	81	245	23	23	23	10
Slurry volume to be pumped (bbl)	16.59	50.18	4.71	4.71	4.71	2.05
Slurry weight (lb/gal)	15.8	15.8	15.8	15.8	15.8	15.8
Calculated top of plug (feet)	9,169	6,321	5,006	3,808	2,013	14
Bottom of plug (feet)	9,604	7,632	5,131	3,933	2,138	39
Type of cement or other material	Class G	Class G	Class G	Class G	Class G	Class G
Method of emplacement (e.g., balance method, retainer method, or two-plug method)	Balanced Plug, Retainer, or CT Plug					



**Figure G-1. Locations of Injection Wells and Monitoring Wells.**



**Figure G-2. Subsidence in the Area of Review.** Subsidence is -1 to 0 feet for June 2015 to July 2022. Vertical displacement data for subsidence analysis are from the Sustainable Groundwater Management Act Data Viewer (<https://sgma.water.ca.gov/>).