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General Comment

Contractual Issues

I have serious concerns for many contractual items in this permit. In general, there is a lot of provisions wherein the operator makes a subjective judgement as to how much change in a measurement would trigger any action. An example is “Anomalous downhole pressure measurements would trigger the need for further investigation of the cause of the change (40 CFR 146.89 (b))” How much change would be needed to be considered anomalous? How long duration? How frequently? How frequently will the monitoring data be evaluated for these anomalies? EPA and Marquis are allowed to “negotiate” how to handle a situation. All negotiated solutions should err on the side of safety.

Chemicals for annulus fluids, well stimulation, well completion, should be public record. An example of this is for annulus fluid additives. It lists possible brand name products. Will the exact chemicals used be made public record? The public will have these chemicals underground in perpetuity. If ever something comes up and a stray chemical is discovered somewhere, the information needs to be available to find if it came from this injection. All of these chemicals (such as TEG) and quantities used, need to also be recorded in the document attached to all title for land that is within the CO2 plume.

This contract doesn't seem to expect well stimulation, but if it is needed, will that be made public and the exact chemicals used made public?

No data should be proprietary. This operation is dependent on the property and resources of the surrounding community and will affect the people and resources in perpetuity. It is an experimental operation. There cannot be secrets as they might hinder appropriate and timely response to any problems that occur.

The bottom line is that the public is intelligent. If a person is pumping a hazardous fluid under pressure into a container, and it is leaking out, the normal person would stop pumping immediately—as soon as they noticed something amiss-- and fix the problem. This is what the public expects from Marquis and EPA. Unfortunately, it is not what happened at ADM, and we expect better this time.

Sincerely,

