

BEFORE THE INDUSTRIAL COMMISSION
OF THE STATE OF NORTH DAKOTA

CASE NO. 29032
ORDER NO. 31586

CORRECTED ORDER
October 14, 2022

IN THE MATTER OF A HEARING CALLED ON A MOTION OF THE COMMISSION TO CONSIDER THE APPLICATION OF MINNKOTA POWER COOPERATIVE, INC. REQUESTING CONSIDERATION FOR THE GEOLOGIC STORAGE OF CARBON DIOXIDE IN THE DEADWOOD FORMATION FROM THE MILTON R. YOUNG STATION LOCATED IN SECTIONS 35 AND 36, T.142N., R.84W., SECTIONS 19, 20, 21, 22, 26, 27, 28, 29, 30, 31, 32, 33, 34 AND 35, T.142N., R.83W., SECTIONS 1, 2, 12 AND 13, T.141N., R.84W., SECTIONS 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 17, 18, 19, 20 AND 21, T.141N., R.83W., OLIVER COUNTY, ND PURSUANT TO NDAC SECTION 43-05-01.

ORDER OF THE COMMISSION

THE COMMISSION FINDS:

- (1) This cause came on for hearing at 9:00 a.m. on the 2nd day of November, 2021.
- (2) Minnkota Power Cooperative, Inc. (Minnkota) made application to the Commission for an order authorizing geologic storage of carbon dioxide from the Milton R. Young Station in the amalgamated storage reservoir pore space of the Deadwood Formation, in portions of Sections 35 and 36, Township 142 North, Range 84 West, Sections 19, 20, 21, 22, 26, 27, 28, 29, 30, 31, 32, 33, 34, and 35, Township 142 North, Range 83 West, Sections 1, 2, 12, and 13, Township 141 North, Range 84 West, Sections 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 17, 18, 19, 20, and 21, Township 141 North, Range 83 West, Oliver County, North Dakota, pursuant to North Dakota Administrative Code (NDAC) 43-05-01, and such other relief as is appropriate.
- (3) Minnkota submitted an application for a Storage Facility Permit and necessary attachments pursuant to NDAC Section 43-05-01-05 and all other provisions of NDAC Chapter 43-05-01 as necessary.

(4) Case Nos. 29029, 29030, 29031, 29032, 29033, and 29034 were combined for the purposes of hearing.

(5) Case No. 29029, also on today's docket, is an application by Minnkota for an order authorizing geologic storage of carbon dioxide from the Milton R. Young Station in the amalgamated pore space of the Broom Creek Formation in portions of Sections 35 and 36, Township 142 North, Range 84 West, Sections 19, 20, 21, 22, 26, 27, 28, 29, 30, 31, 32, 33, 34, and 35, Township 142 North, Range 83 West, Sections 1, 2, 12, and 13, Township 141 North, Range 84 West, Sections 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 17, 18, 19, 20, and 21, Township 141 North, Range 83 West, Oliver County, North Dakota, pursuant to NDAC Chapter 43-05-01.

(6) Case No. 29030, also on today's docket, is an application filed with the Commission by Minnkota for an order of the Commission determining the amalgamation of storage reservoir pore space, pursuant to a Geologic Storage Agreement for use of pore space falling within portions of Sections 35 and 36, Township 142 North, Range 84 West, Sections 19, 20, 21, 22, 26, 27, 28, 29, 30, 31, 32, 33, 34, and 35, Township 142 North, Range 83 West, Sections 1, 2, 12, and 13, Township 141 North, Range 84 West, Sections 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 17, 18, 19, 20, and 21, Township 141 North, Range 83 West, Oliver County, North Dakota in the Broom Creek Formation, has been signed, ratified, or approved by owners of interest owning at least sixty percent of the pore space interest within said lands pursuant to North Dakota Century Code (NDCC) Section 38-22-10.

(7) Case No. 29031, also on today's docket, is a motion of the Commission to determine the amount of financial responsibility for the geologic storage of carbon dioxide from the Milton R. Young Station located in portions of Sections 35 and 36, Township 142 North, Range 84 West, Sections 19, 20, 21, 22, 26, 27, 28, 29, 30, 31, 32, 33, 34, and 35, Township 142 North, Range 83 West, Sections 1, 2, 12, and 13, Township 141 North, Range 84 West, Sections 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 17, 18, 19, 20, and 21, Township 141 North, Range 83 West, Oliver County, North Dakota in the Broom Creek Formation, pursuant to NDAC Section 43-05-01-09.1.

(8) Case No. 29033, also on today's docket, is an application filed with the Commission by Minnkota for an order of the Commission determining the amalgamation of storage reservoir pore space, pursuant to a Geologic Storage Agreement for use of pore space falling within portions of Sections 35 and 36, Township 142 North, Range 84 West, Sections 19, 20, 21, 22, 26, 27, 28, 29, 30, 31, 32, 33, 34, and 35, Township 142 North, Range 83 West, Sections 1, 2, 12, and 13, Township 141 North, Range 84 West, Sections 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 17, 18, 19, 20, and 21, Township 141 North, Range 83 West, Oliver County, North Dakota in the Deadwood Formation, has been signed, ratified, or approved by owners of interest owning at least sixty percent of the pore space interest within said lands pursuant to NDCC Section 38-22-10.

(9) Case No. 29034, also on today's docket, is a motion of the Commission to determine the amount of financial responsibility for the geologic storage of carbon dioxide from the Milton R. Young Station located in portions Sections 35 and 36, Township 142 North, Range 84 West, Sections 19, 20, 21, 22, 26, 27, 28, 29, 30, 31, 32, 33, 34, and 35, Township 142 North, Range 83

West, Sections 1, 2, 12, and 13, Township 141 North, Range 84 West, Sections 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 17, 18, 19, 20, and 21, Township 141 North, Range 83 West, Oliver County, North Dakota in the Deadwood Formation, pursuant to NDAC Section 43-05-01-09.1

(10) Commission staff requested to take administrative notice of the well files and geophysical logs of all wells within or nearby the area of review, to which Minnkota had no objection.

(11) The record in these matters was left open to receive additional information from Minnkota. Such information was received on November 16, December 8, and December 10, 2021, and the record was closed.

(12) Pursuant to NDCC Section 38-22-06 and NDAC Section 43-05-01-08: The notice of filing of the application and petition and the time and place of hearing thereof was given, and that at least 45 days prior to the hearing, Minnkota, as the applicant, did give notice of the time and place of said hearing and the Commission has accepted the notice as adequate, and that the applicant did, at least 45 days prior to the hearing, file with the Commission engineering, geological and other technical exhibits to be used and which were used at said hearing, and that the notice so given did specify that such material was filed with the Commission; that due public notice having been given, as required by law, the Commission has jurisdiction of this cause and the subject matter.

(13) The Commission gave at least a thirty-day public notice and comment period for the draft storage facility permit and issued all notices using methods required to all entities under NDCC Section 38-22-06 and NDAC Section 43-05-01-08. Publication was made September 29, 2021, and the comment period for written comments ended at 5:00 PM CDT November 1, 2021. The hearing was open to the public to appear and provide comments.

(14) The Commission received a letter from the State Historical Society of North Dakota on October 22, 2021 indicating it reviewed the application of Minnkota and recommends a Class III (pedestrian survey) in the project area for the proposed monitoring well. Minnkota agrees to take the activity of performing a Class III pedestrian survey and State Historic Preservation Office issuance of a determination of effect, prior to commencing construction on the well pad, as a condition precedent of the drilling permit for the NRDT-1 monitoring well.

(15) The Commission received a letter from the Dakota Resource Council (DRC) on November 1, 2021 indicating concern with the safety of this project. DRC states there should be more robust regulation around carbon storage that will ensure that blow outs and leakage cannot occur. DRC is concerned with Appendix E of the filed application indicating loss of mechanical integrity injection wells-tubing/packer leak being classified as serious and likely to occur. DRC states if this were to occur, it could greatly affect both the natural and human environment and if this were a chronic problem, it could potentially derail the entire project and waste millions in taxpayer dollars. DRC is concerned that if the leakage were large enough, it could poison the surrounding air and ecosystem and greatly harm the health of people within the area.

DRC states research shows the injection of carbon dioxide has the potential for causing small scale earthquakes that can rupture the seal of carbon storage. DRC notes that two Stanford scientists recently concluded that while injection from CCS is unlikely to trigger large

earthquakes, even small earthquakes from the injection process can break the seal of a carbon dioxide repository. DRC states the injection process of carbon dioxide storage is incredibly risky and the geologic report for this permit and top scientists agree with these findings. DRC states this is likely why there are no internationally recognized standards for monitoring and verifying that carbon dioxide sinks will remain underground.

DRC recommends that there is an internationally recognized system of monitoring and steps that are taken to ensure every risk in the geologic report is classified as unlikely before this permit is approved.

(16) Minnkota testified the tubing could leak based on experience, and such an event would be serious and impact the project economically because they would have to stop injection to replace the tubing or patch the casing. Minnkota testified that with this risk scenario, there is no loss of containment. Minnkota testified that there are controls in place listed along with the risk assessment, and that the risk likelihood is without the controls in place. The radius of influence from a large carbon dioxide release from the wellhead was analyzed by Minnkota. The release would be limited to approximately 2,153 feet at a concentration of 5,000 ppm with conservative wind factors, and occupied dwellings would not fall within this radius.

Minnkota testified for an earthquake to occur, there would need to be a fault present and have indicated there are no faults present within the storage reservoir or upper or lower confining zones. Minnkota testified that the reservoirs and their associated injection pressures do not pose a risk for inducing movement in the identified Precambrian basement fault to create a small or large earthquake. Minnkota testified microseismic events caused by injection created fractures will not be created due to the regulatory bottom hole pressure constraint of 90% of fracture pressure. Minnkota testified it uses the fracture pressure gradient of the injection formation. Minnkota included data showing it was unable to get the upper confining zone to break down to get a fracture pressure at 10,985 and 10,867 psi, but the injection reservoir broke down at 8,231 psi.

(17) The Commission has rules and regulations in place to safeguard against tubing leaks or blowouts. NDAC Section 43-05-01-11(10) requires all tubing strings must meet the standards contained in subsection 6. All tubing must be new tubing or reconditioned tubing of a quality equivalent to new tubing and that has been pressure-tested. For new tubing, the pressure test conducted at the manufacturing mill or fabrication plant may be used to fulfill this requirement.

NDAC Section 43-05-01-11(11) requires all wellhead components, including the casinghead and tubing head, valves, and fittings, must be made of steel having operating pressure ratings sufficient to exceed the maximum injection pressures computed at the wellhead and to withstand the corrosive nature of carbon dioxide. Each flow line connected to the wellhead must be equipped with a manually operated positive shutoff valve located on or near the wellhead.

NDAC Section 43-05-01-11(12) requires all packers, packer elements, or similar equipment critical to the containment of carbon dioxide must be of a quality to withstand exposure to carbon dioxide.

NDAC Section 43-05-01-11(14) requires all newly drilled wells must establish internal and external mechanical integrity as specified by the Commission and demonstrate continued

mechanical integrity through periodic testing as determined by the Commission. All other wells to be used as injection wells must demonstrate mechanical integrity as specified by the Commission prior to use for injection and be tested on an ongoing basis as determined by the Commission.

NDAC Section 43-05-01-11(17) requires all injection wells must be equipped with shutoff systems designed to alert the operator and shut-in wells when necessary.

(18) The Commission has rules and regulations in place requiring the operator to demonstrate seismicity will not interfere with containment and prohibiting fracturing of the injection zone. NDAC Section 43-05-01-05(1)(b)(2)(m) requires the applicant must provide information on the seismic history, including the presence and depth of seismic sources and a determination that the seismicity would not interfere with containment.

NDAC Section 43-05-01-11.3(1) requires, except during stimulation, the storage operator shall ensure that injection pressure does not exceed ninety percent of the fracture pressure of the injection zone so as to ensure that the injection does not initiate new fractures or propagate existing fractures in the injection zone. Injection pressure must never initiate fractures in the confining zone or cause the movement of injection or formation fluids that endanger an underground source of drinking water. All stimulation programs are subject to the Commission's approval as part of the storage facility permit application and incorporated into the permit.

(19) The Commission received a letter from CCUS Consultant Geoscientist, Daniel R. Zebrowski (Zebrowski) on October 29, 2021 stating Minnkota's permit application does not comply with NDCC Chapter 38-22 and NDAC Chapter 43-05-01 and that there is potential for leakage of the carbon dioxide from the injection formation. Zebrowski states that failure of the carbon dioxide storage facility could allow for contamination of the near surface freshwater aquifers and surface water features. Additionally, that technical data presented by Minnkota to the North Dakota Industrial Commission reveal incomplete evaluation of geologic data, engineering data, and 2D and 3D geophysical data to properly assess and characterize the confinement formation and injection formations and lower confinement formations as described in their permit application.

Zebrowski references the seismic data collected by Minnkota and states they have failed to display any geophysical maps constructed and calibrated with existing well data for subsurface formations. Zebrowski states it is imperative the Commission reviews such geophysical data, interpretations, and maps to fully understand the geological setting across the storage facility area and the proposed injection site location to ensure the cap-rock and containment formations do not have faults which breach both and would allow for carbon dioxide to escape and contaminate freshwater aquifers.

Zebrowski states Minnkota failed to display any 2D or 3D seismic data from the surface to the basement within the storage facility and area of review in support of their carbon dioxide storage permit application. Zebrowski questions why Minnkota completed required work and then did not display final products in support of the storage facility permit application, and why no 3D seismic lines which directly tie the proposed injection well were depicted to the Commission in support of the carbon dioxide storage application. Zebrowski states four 2D seismic lines were

acquired and processed which directly tie the proposed injection well yet none of this data is utilized in support of the carbon dioxide storage facility permit application and depicted for the Commission. Zebrowski states that additional 2D seismic legacy data is available within the storage facility area.

Zebrowski states Minnkota has displayed partial lines (250'-400' of data out of over 9,000' of data) from two different 3D seismic impedance volumes which only depict the Icebox Formation and the Black Island and Deadwood Formations. Zebrowski states utilizing the limited amount of impedance 3D seismic data presented in support of the carbon dioxide storage facility permit application allows for one to interpret several faults within the Icebox, Black Island, and Deadwood Formations. Zebrowski states the applicant states an evaluation has been completed from the Deadwood Formation to freshwater aquifers, and that 3D seismic data and interpretations displayed to the Commission are incomplete and lack technical merit for the Commission to make a reasonable evaluation of the carbon dioxide storage container integrity. Zebrowski states one can clearly depict near vertical faults within the Icebox, Black Island, and Deadwood Formations utilizing the applicant's 3D seismic data.

Zebrowski states the applicant directly accepts a much higher degree of risk for carbon dioxide storage facility failure of the cap-rock and injection formations by withholding critical scientific data and the Commission should not allow the State of North Dakota to accept additional risk of a carbon dioxide storage facility containment failure.

Zebrowski includes images of Figure 2-7 from Minnkota's application. Zebrowski provided edited images from Minnkota's application, captioned Figure 2-7, Figure 2-7(a), and Figure 2-7(b). On Figure 2-7 Zebrowski asks where are formation tie in points? On Figure 2-7(a) Zebrowski states Icebox, Black Island, and Deadwood 3D seismic structure and isopach maps are not presented, and that they should have been included in support of the carbon dioxide storage permit application. Zebrowski claims this data is required to effectively evaluate the storage facility area and integrity. Zebrowski states that without this data, the North Dakota Industrial Commission will be making a carbon dioxide storage facility permit decision based solely on subsurface well control data, and thus why acquire 2D and 3D seismic data? On Figure 2-7(b) Zebrowski states that data is missing above the Icebox Formation and below the Precambrian. Zebrowski states that interpretation of the limited 3D impedance lines depicts several near vertical faults within the Deadwood Formation, and such faults are typical for the Williston Basin. Zebrowski states the faults interpreted may also breach the cap-rock formation. Zebrowski asks why 3D seismic data above and the Icebox Formation below the Deadwood Formation have been removed? Zebrowski states that deliberately covering up 3D seismic data from a permit application leads to suspicion of the applicant's interpretations of the data.

Zebrowski states the applicant projects a direct well tie via synthetic seismogram on Figure 2-7 (west 3D seismic survey), and that no formation tops are displayed on the synthetic trace from the well log data for the J-LOC #1. Zebrowski asks where is the top and base of the Icebox, Black Island, and Deadwood Formations displayed on the synthetic seismogram? Zebrowski states that it could be asked from the amount of data displayed, if this is the Icebox and Deadwood Formations? Zebrowski states that the applicant has not proven the seismic data displayed is the top and base of the Icebox, Black Island and Deadwood Formations. Zebrowski states that seismic frequencies of the synthetic trace are much higher than the actual 3D seismic

data displayed and are not an exact seismic tie and can lead to mis-ties of both 2D and 3D seismic data.

Zebrowski states no 3D seismic data and synthetic seismogram ties from the J-ROC1 #1 wellbore are depicted in the permit application. Zebrowski states data quality at the J-ROC1 #1 is probably poor which does not allow for a direct synthetic seismogram tie of the 3D seismic data and well log data from the J-ROC1 #1 and J-LOC #1 depict different stratigraphy at the top of the Deadwood Formation and asks if the Black Island and Deadwood Formations are displayed in Figure 2-7.

Zebrowski states the permit application indicates additional seismic surveys within the area of review to monitor the carbon dioxide plume for this potential carbon dioxide storage facility site. Zebrowski asks why budget money if there is no intention to display data, interpretation, and results.

Zebrowski references a report, "North Dakota Integrated Carbon Storage Complex Feasibility Study" and states there are no geophysical maps or 3D seismic lines in it. Zebrowski includes Figure A-5 from the report and states they are displayed to inform the Commission of how some data can be interpreted differently and what is stated may not necessarily be correct. Zebrowski states the figure is captioned "Map view of seismic amplitude time slice through the Broom Creek Formation with interpreted geobodies. High amplitude values (blue) caused by thin bed tuning indicate the blue amplitude are interdunal carbonates." Zebrowski states the caption is incorrect and does not indicate the blue amplitude are interdunal carbonates. Zebrowski states thin bed tuning relates to the ability of seismic data to resolve the top and base of a seismic event. Zebrowski states as the thickness between the top and base decrease the seismic character will not be able to resolve top and base thickness. Zebrowski states one must have an existing well (none depicted in figure) with a sonic log and porosity logs directly tied to each seismic event to justify that statement. Zebrowski states a more reasonable interpretation is the positive amplitude events (blue) depicted are a shale/siltstone within the Deadwood [sic] Formation and the amplitude scale varies within the formation which makes it appear there are three separate geologic features, when it is one formation or geologic feature. Zebrowski states the fourth blue amplitude created in Figure A-5 is not defined as an interdunal carbonate.

Zebrowski includes Figure B-10 and B-10(a) from the same report. Zebrowski references Figure B-10(a) and states a partial interpretation of the same time slice clearly depicts a fault with a NE to SW orientation adjacent to the Flemmer-1 wellbore. Zebrowski states the features within the orange boundaries appear to be additional faults and are not a channel feature as stated. Zebrowski states channel features can usually be distinguished by a contrast from the outer edges (overbank-channel area) of a channel, not from the middle as has been suggested while viewing time slice data. Zebrowski asks, "How can the middle of a channel contrast (same rock-stratigraphy)?" Zebrowski states one can see stripping effects (acquisition footprint) within this 3D seismic data set.

Zebrowski includes Figure B-11, from an uncited source, stating it depicts a combination of 3D vertical seismic line with an associated time slice. Zebrowski states the figure was included to demonstrate to the Commission one can identify both faults and channels utilizing existing 3D seismic data. Zebrowski notes the channel displayed on the time slice is recognized by the overbank-channel contrast, and that both positive and negative amplitudes are demonstrated in

this example. Zebrowski states, “The faults have zero amplitudes (white) depicted, are in the middle of a fault.”

Zebrowski states the Department of Energy (DOE) has utilized time slice data for past carbon dioxide projects. Zebrowski references an article published by DOE in 2013 “Time-lapse surface seismic inversion with thin bed resolution for monitoring carbon dioxide sequestration: A case study from Cranfield, Mississippi” depicting several time slices. Zebrowski includes Figure #3 from the article and states it depicts four time slices of the Tuscaloosa injection zone across the entire 3D seismic survey. Zebrowski states the first time slice is pre-injection of carbon dioxide, the second post injection of carbon dioxide. Zebrowski states one can easily recognize the difference in the seismic data from carbon dioxide as stated in the article. Zebrowski adds one can easily recognize at least one major fault within the area of review, trending in a NW to SE orientation. Zebrowski includes Figure #4(a) from the article and states it depicts a portion of the inline from the 3D seismic survey. Zebrowski states the inline extends the entire length of the 3D seismic survey and notes the fault can clearly be recognized on inline 1102. Zebrowski includes Figure #5 as a comparison of the amount of 3D seismic data the applicant has given the Commission to evaluate this carbon dioxide storage facility permit. Zebrowski states only the Tuscaloosa (injection zone) Formation is depicted in Figure #5.

Zebrowski states one can assume the 3D seismic data quality around the injection well is probably poor as there is a lake adjacent to the proposed carbon dioxide injection well and within the storage facility area. Zebrowski states without proper undershooting (acquisition) of the lake a large data gap at the surface will be observed on the 3D seismic data volume. Zebrowski includes Figure #8 and states it depicts similar large surface data gaps on the seismic line displayed.

Zebrowski includes Figure #6 and states it depicts one of the 3D impedance lines (Figure 2-7 (B-B')) taken from the applicant's storage facility permit application with a similar scale for appearance and comparison to Figure #5. Zebrowski states it is impossible for the Commission to evaluate the cap-rock and injection formation integrity of the storage facility area from this limited amount of data. Zebrowski states the applicant depicts less than 3.1% of the actual data of one strike line from the 3D seismic survey, and that 96.9% of the seismic line depicted in Figure 2-7 is missing.

Zebrowski references Figure #8 and includes Figure #8a, and states it depicts a Gulf Oil Company seismic line over Little Knife Field located in the Williston Basin which has been published several times. Zebrowski references Figure #8 and states it depicts the entire 2D seismic line. Zebrowski references Figure #8a and states it demonstrates the same amount of seismic data Minnkota depicts in the storage facility permit application. Zebrowski states the applicant has denied the Commission the opportunity to review and evaluate 2D and 3D seismic data acquired and processed specifically for this carbon dioxide storage facility permit application.

Zebrowski states the applicant should display several strike lines, dip lines and arbitrary lines from the 3D seismic volumes which display normal migrated (black and white wiggle trace filled) seismic data from surface to well below the Precambrian in support of this carbon dioxide storage facility permit application. Zebrowski states several lines should directly tie the proposed injection and monitor wells, and that the applicant could also display several time

slices of the 3D volume from 1.00 seconds to 1.40 seconds “(20 msec intervals)” wherein the Commission can have confidence the cap rock and injection formations are free of any faults which might breach the formations and allow carbon dioxide to escape and contaminate freshwater aquifers.

Zebrowski states all 2D seismic data could also be displayed from surface to below the Precambrian with the carbon dioxide storage facility permit application. Zebrowski believes by including critical geophysical data requested above the Commission and public would have a higher degree of confidence of carbon dioxide containment in the proposed carbon dioxide storage facility area.

Zebrowski states the applicant has utilized DOE funds to characterize the proposed Tundra (CarbonSAFE III) carbon dioxide storage facility. Zebrowski states all data (including all geologic well data, 2D and 3D geophysical data, reports, simulations, etc.) are public record and can be obtained by any United States citizen. Zebrowski states the eastern 3D seismic survey and all 2D seismic lines are not proprietary (funded by DOE), and that the western 3D seismic survey appears to be licensed, but can be released to North Dakota government officials per the 3D seismic license agreement. Zebrowski states, “The applicant has yet to deposit any G&G data (well log, maps, seismic data, reports, simulations, etc.) from this research project to the EDX (Energy Data Exchange) repository operated by DOE/NETL for peer review and exchange of ideas.”

Zebrowski supplies Figure #9 and states the applicant has failed to address the linear geologic surface feature which is within the 3D seismic survey outline, proposed carbon dioxide storage facility area and the area of review, approximately 1.2 miles from the proposed carbon dioxide injection well. Zebrowski states linear geologic surface features are usually associated with subsurface faults. Zebrowski states several linear geologic surface features are depicted on the North Dakota State Government website (nd.gov/gis/apps/HubExplorerV2/) within the area of review. Zebrowski states the applicant has stated no faults are present within the storage facility area and area of review. Zebrowski states a linear geologic surface feature could have a large subsurface fault(s) which potentially fault freshwater aquifers and extend several thousand feet below the surface.

Zebrowski supplies Figure #10 and states it depicts existing 2D seismic data over the proposed storage facility area which has not been depicted in this carbon dioxide storage facility permit application. Zebrowski states several long regional 2D seismic lines were probably licensed for the evaluation of this storage facility permit at the inception of this carbon dioxide sequestration project. Zebrowski states Figure #9 [sic] also depicts the approximate location of the storage facility area and 3D seismic survey locations along with the location of the linear geologic surface feature. Zebrowski states the existing 2D seismic data would be extremely important to assist the Commission in determining the vertical and horizontal extent of the Deadwood storage facility area. Zebrowski states the applicant could also depict the full migrated 2D seismic lines previously licensed to the Commission for review.

Zebrowski states the applicant may have licensed an existing regional 2D seismic line (81087-3983) which is an east-west line located approximately 2,200’ south of the J-ROC1 #1 wellbore and within the storage facility area and the area of review. Zebrowski states this line extends over five miles east and five miles west of the proposed carbon dioxide injection well.

Zebrowski states the applicant has not mentioned or displayed this line in the carbon dioxide storage facility permit application. Zebrowski states this line is required to assist in characterization of the carbon dioxide storage facility area and the area of review in an east-west direction. Zebrowski states additional existing 2D seismic data may have also been licensed by the applicant within the storage facility area and area of review and are not depicted for this carbon dioxide storage facility permit application. Zebrowski states that if available from applicant, this data could be useful to fully evaluate the storage facility area and area of review for potential regional and localized faults.

Zebrowski includes Figure 2-14(a) and states it is the same lithofacies distribution model from the applicant's permit with an interpretation of several faults within the carbon dioxide storage facility area. Zebrowski states the interpreted faults appear to be associated with 2D and 3D seismic interpretations not depicted in the permit application. Zebrowski states the faults could easily extend much higher in the section as Precambrian is below the Deadwood and Icebox Formations, and that such faults could be associated linear basement features.

Zebrowski states pursuant to NDCC Chapter 38-22 (Carbon Dioxide Underground Storage) and NDAC Chapter 43-05-01 (Geologic Storage of Carbon Dioxide) the applicant has not presented all technical work required for the North Dakota Industrial Commission to make a comprehensive decision on the storage facility area and integrity from the carbon dioxide storage facility permit application. Zebrowski states applicant has withheld vital geologic and geophysical data, incorrectly displayed geologic and geophysical data, or did not acquire geological and geophysical data required in the permit application which could reduce the risk of a carbon dioxide storage facility failure.

Zebrowski claims the applicant has failed to comply with NDCC Section 38-22-08(1):

- 1.) Applicant has failed to provide and depict all characterization interpretations and correct detailed seismic data and interpretations, geologic/geophysical maps, and cross sections for a comprehensive evaluation of the carbon dioxide storage facility permit application as required by the State of North Dakota and the Commission.
- 2.) Applicant has failed to acquire MDT, FMI, or QuantaGeo logs at the proposed injection wellbore (J-ROC1 #1) location or within the carbon dioxide storage facility area as required by the State of North Dakota.
- 3.) Applicant has failed to address a linear geologic surface feature within the proposed storage facility area which usually indicate the presence of subsurface faults as required by the State of North Dakota.

Zebrowski claims the applicant has failed to comply with NDCC Section 38-22-08(2):

- 1.) Applicant has not demonstrated the storage facility is suitable and feasible for carbon dioxide injection and storage by withholding critical geological/geophysical maps and both 2D and 3D seismic data (strike lines, dip lines, arbitrary lines, time slices, etc.) for interpretation and inspection by the State of North Dakota and the Commission. Strike lines, dip lines, arbitrary lines, and time slices of 3D seismic volumes can easily verify the presence of faults (storage containment failure) within the storage facility area. Figure

#2-7(b) depicts several interpreted faults within the Icebox Formation and Black Island and Deadwood Formations from the existing 3D seismic data set.

2.) Applicant has failed to run MDT logs over the confinement formation and injection b or any other formation at the proposed injection well location (J-ROC1 #1) or within the storage facility area. Applicant does not have any microfracture in situ stress tests from the J-ROC1 #1 wellbore and cannot determine formation pressures, high quality fluid samples, and permeability anisotropy within the storage facility area as required by the State of North Dakota and the Commission. Applicant projects incomplete MDT data from a wellbore located over 4.5 miles (outside the proposed storage facility area) from the proposed carbon dioxide injection wellbore (J-ROC1 #1) wherein geologic conditions (depth, stratigraphy, structure, dip rates, pressure, etc.) have changed above the cap rock formations, within the cap rock formations, within the injection formation, and below the injection formation. Applicant has failed to demonstrate the storage facility is suitable and feasible for carbon dioxide injection and storage. Applicant failed to run an FMI or QuantaGeo log in the proposed injection wellbore (J-ROC1 #1) which can demonstrate faults and fractures above the cap rock formations, within the cap rock formations, within the injection formation and below the injection formations.

3.) Applicant has failed to demonstrate the storage facility is suitable and feasible for carbon dioxide injection and storage.

Zebrowski claims the applicant has failed to comply with NDCC Section 38-22-08(8):

1.) Applicant has withheld detailed structure and isopach maps of the confining and injection formations constructed from existing 2D and 3D seismic data from the carbon dioxide storage facility permit application. This data can be directly calibrated to geological well data from the proposed injection well. Applicant has withheld 2D and 3D seismic data (lines, time slices, etc.) from the Commission and public. Applicant states no faults are present in the area of review area but do not provide any evidence to the Commission to support such statement. Figure 2-7(b) clearly depicts several interpreted faults within the storage facility area and contrast with the applicant's statement. Applicant could easily provide such evidence to support their statement by making several inlines, cross lines, and arbitrary lines from the migrated 3D seismic volume (surface to below Precambrian) to the Commission. Applicant could also display time-slices from above the cap-rock formation through the injection formations at "20 msec." intervals utilizing the entire 3D seismic volumes. This data is required to confirm that carbon dioxide will not escape from the storage reservoir within the storage facility area. Applicant has failed to confirm from all geologic, geophysical, and engineering data that carbon dioxide will not escape from the storage reservoir.

2.) Zebrowski reiterates that the applicant has failed to run MDT logs and an FMI or QuantaGeo log in the proposed injection wellbore (J-ROC1 #1).

Zebrowski claims the applicant has failed to comply with NDCC Section 38-22-06(10):

1.) Applicant's permit clearly has a higher degree of containment failure risk which will clearly endanger human health and endanger the environment (permanent contamination of

freshwater aquifers and surface water ponds, lakes, and streams). Faults are present within confinement and injection zones.

2.) Applicant has not addressed linear geologic surface features (which are usually associated with faults) within the carbon dioxide storage facility area and the area of review. Surface/near-surface fault(s) could extend downward through freshwater aquifers into deeper formations. Carbon dioxide could escape confinement and travel through a series of faults to freshwater aquifers and surface water (lakes, streams, etc.) If carbon dioxide escapes and makes its way to the surface it will collect in surface sink areas and could potentially kill all human and wildlife within surface sink areas.

Zebrowski claims the applicant has failed to comply with NDCC Section 38-22-08(11):

1.) At the present, the applicant's carbon dioxide storage permit application is not in the public interest as the risk of carbon dioxide storage facility containment failure clearly outweighs the removal of carbon dioxide from the atmosphere. Applicant has failed to provide and depict all characterization data, interpretations, and maps for a comprehensive evaluation by the State of North Dakota and the Commission of the carbon dioxide storage facility area and area of review.

Zebrowski claims the applicant has failed to comply with NDCC Section 38-22-08(12):

1.) Applicant has not demonstrated the storage reservoir has been defined. The vertical boundaries have not been determined directly over the proposed injection wellsite, storage facility area, and a substantial portion of the area of review (storage reservoir). Applicant has withheld critical geological/geophysical maps and both 2D and 3D seismic data for interpretation and inspection by the State of North Dakota and the Commission. Applicant has not provided accurate detailed structure maps and isopach maps of the cap rock formations and injection formation which define the vertical and horizontal extent of the potential carbon dioxide reservoir. Applicant has not depicted any seismic data (2D or 3D) which depicts both the cap rock formation and the injection formation in this application. Applicant has only depicted maps constructed from existing well control for the horizontal and vertical boundaries of the storage reservoir. Applicant has not addressed interpreted faults depicted in Figure 2-7(b). Applicant has not defined the horizontal and vertical boundaries of the storage reservoir utilizing all existing and required scientific data. Zebrowski reiterates that the applicant has failed to run MDT logs on the proposed injection wellbore (JROC-1) and without formation pressure data the applicant cannot define the horizontal and vertical boundaries of the storage reservoir as required by the State of North Dakota.

Zebrowski claims, "The applicant has failed to comply with NDAC Section 43-05-01(C-4) Geologic Exhibits i."

1.) Applicant has failed to depict accurate well log cross sections which depict the structural configuration of the storage reservoir. Zebrowski references Figure 2-12b and states it depicts two cartoon structure cross sections which are not accurate. The cross sections are not displayed relative to sea level and do not indicate true formation dips of the geologic conditions at the storage reservoir in a cross-section view. Regional well log structure maps (Figure 2-13) are depicted in subsea depths while both cross sections depicted in Figure

2-12b are in measured depth or true vertical depth, not subsea depth. Accurate structural cross sections could assist in identification of existing faults within the carbon dioxide storage facility area and area of review. Zebrowski states the applicant has failed to comply with accurate structural cross sections as required by the State of North Dakota.

Zebrowski claims, “The applicant has failed to comply with NDAC Section 43-05-01(C-4) Geologic Exhibits j.”

1.) Zebrowski references Figure 2-7(b) and states it depicts several interpreted faults within the injection zone that appear to transect the confining zone. Zebrowski states additional 2D and 3D seismic data must be displayed to confirm the extent and orientation of faults within the carbon dioxide storage facility area and area of review. Zebrowski reiterates the applicant has failed to address a linear geologic surface feature approximately 1.2 miles from the proposed injection well. Zebrowski states this linear geologic surface feature is probably related to a large subsurface fault within the storage facility area and area of review. Zebrowski states the near surface freshwater aquifers could be faulted and that the faults could also extend several thousand feet below surface. Zebrowski reiterates the applicant has failed to run MDT logs at the proposed injection well location (J-ROC1 #1) or within the storage facility area. Zebrowski states the applicant projects incomplete MDT data from a wellbore located over 4.5 miles from the proposed carbon dioxide injection wellbore (J-ROC1 #1). Zebrowski reiterates the applicant has failed to run an FMI or QuantaGeo log in the proposed injection wellbore (J-ROC1 #1) which can demonstrate faults and fractures within the cap rock formations, injection formation, below the injection formation, and within the storage facility area. Zebrowski states the applicant has no log data within the storage facility area to determine if fractures or faults exist. Zebrowski states the applicant cannot definitively state no fractures or faults are present in the storage facility area without this data.

Zebrowski claims, “The applicant has failed to comply with NDAC Section 43-05-01(C-4) Geologic Exhibits k.” Zebrowski reiterates the applicant has not provided seismic data, addressed faults depicted in Figure 2-7(b), and addressed linear geologic surface features. Zebrowski reiterates the applicant has failed to run MDT logs over formations at the J-ROC1 #1.

Zebrowski states, “The applicant has failed to comply with NDAC Section 43-05-01(C-4) Geologic Exhibits L.” Zebrowski reiterates the applicant has not run MDT logs and an FMI or QuantaGeo log in the J-ROC1 #1.

Zebrowski states he does not object to carbon dioxide sequestration and that his goal is to assist in evaluations from a public perspective and help reduce risk of potential carbon dioxide containment failures. Zebrowski states the applicant could easily remedy most of the deficiencies with additional time and completed work products suggested and required by the State of North Dakota. Zebrowski states the applicant could not receive a Class VI (UIC) injection well permit from the EPA with incomplete data (No MDT, FMI or QuantaGeo log) as demonstrated in this carbon dioxide storage facility permit application.

Zebrowski, considering the evidence depicted within his letter, urges (on behalf of several surface owners within the carbon dioxide storage facility area) the North Dakota Industrial Commission to reject Minnkota Power Cooperative, Inc’s storage facility permit (Case No.

29032) until such time the applicant fulfills all requirements set forth by the State of North Dakota in NDCC Chapter 38-22 and NDAC Chapter 43-05-01. Zebrowski states the applicant has burdened the State of North Dakota with additional containment failure risks with an incomplete application that does not comply with North Dakota State Law. Zebrowski states it would be extremely unfortunate if carbon dioxide injection begins and immediately escapes the Black Island and Deadwood Formations.

(20) Minnkota testified it believes it is in complete compliance with the statutes and regulations, and that comments made by Zebrowski stating the application does not comply with NDCC Chapter 38-22 and NDAC Chapter 43-05-01, are an opinion.

Minnkota testified that the seismic interpretation was completed from the Precambrian basement up through the Pierre Formation and that this interpretation included structural surfaces, including the reservoirs of interest and confining layers. Minnkota testified this was included in the model which was provided to the Commission as part of the application. Minnkota testified in the Deadwood permit application, time structure maps were included that were constructed and calibrated using existing well data, particularly Figure 2-55 and Figure 2-59.

Minnkota testified having seismic data and displaying seismic data is not a requirement of the regulations, and that no data was withheld. Minnkota testified in the Deadwood application that Figure 2-57 shows a 3D seismic line tied to the J-ROC1 #1 well. Minnkota testified that 2D seismic lines were collected as part of the project and permit application and did not display them within the application since the four 2D lines are within the 3D seismic survey outline. Minnkota testified 2D information was not included in the model, only the 3D data was. Minnkota testified that 2D legacy seismic data was typically collected with lesser parameters than modern standards and that it purchased 28 miles of 2D legacy seismic data in this area. Minnkota testified such legacy data was purchased as part of the CarbonSAFE phase 2 feasibility study, conducted by the Energy and Environmental Research Center (EERC) in 2016. The datasets were deemed to have insufficient data quality in review, leading to performing additional 2D and 3D data acquisitions.

Minnkota testified impedance volumes displayed are using smooth seismic horizons as a framework, but that the initial model uses square grid blocks which are not able to capture the smoothness of the structure. Minnkota testified the square grid blocks arranged in a vertical orientation leave remaining artifacts in the final inversion results which present themselves as vertical features, but that those features are only artifacts. Minnkota testified that acoustic impedance volumes are not useful in interpreting structure and attempting to draw conclusions or interpreting a fault from this dataset is not a sound method for geophysical interpretation.

Minnkota testified that the data necessary has been provided to address various rules related to presence of any leakage pathways, lateral continuity of the formation, upper confining zones, thickness, structure, and structural features that have the potential to serve as fluid communication pathways, and structural or stratigraphic pinch outs in the region with figures in the application. Minnkota testified it can supply additional data if the Commission finds additional information relevant. Minnkota testified the inversion was focused on the reservoir which was displayed to show data used for the geologic model and that there was not a good inversion match above and below the reservoir.

Minnkota testified that well logs from the J-LOC #1 and J-ROC1 #1 were used to calibrate well log data to seismic data for both 3D seismic data sets, and BNI #1 log data was used for the western seismic data set. Minnkota testified data quality from the J-ROC1 #1 well was sufficient to tie the well to the seismic data and used the east-west 2D seismic line acquired to tie the western 3D seismic data set to the eastern data set. Minnkota testified this confirmed the well tie for the western 3D survey to the J-LOC #1 well and is in agreement with the independent well tie of the eastern 3D survey to the J-ROC1 #1 well.

Minnkota testified data sets referenced in paragraph 5 of page 4 and pages 5-7 of Zebrowski's comments were not used in this application as they were not connected to this application or the location under consideration. Minnkota testified the data sets referenced in Zebrowski's comments are related to a different location in Mercer County and some data is from a different state. Minnkota testified several figures are from different formations, depositional environments, and structural regimes and are not relevant to the application.

Minnkota testified surface infrastructure and obstacles such as Nelson Lake were considered in the design of the 3D survey and appropriately addressed through source and receiver line placement, and that the 3D seismic data was sufficient for interpreting and tying well log data to the seismic data for interpretation of the formations of interest.

Minnkota testified the linear geologic surface features are glacial features and not relevant to the deep subsurface geology. Minnkota testified freshwater sample data indicating faulting is unsubstantiated and that no supporting information was provided by Zebrowski. Minnkota testified that it and EERC reviewed available baseline freshwater sample data in the region and collected samples.

Minnkota testified vertical features in Figure 2-14 from their application are modeling artifacts at the edges of the seismic horizons put into the model as well as gentle structure from the seismic data, and that the artifacts and structure were amplified in appearance by vertical exaggeration.

Minnkota testified the implied failure to comply with statutory and regulatory requirements are an opinion by Zebrowski, and that he does not have the authority to make those conclusions. Minnkota testified an FMI log was run in the J-ROC1 #1 well, and that MDT was unable to be acquired. Minnkota testified an MDT log is not a requirement for the storage facility permit application, but is required prior to injection and will be performed and submitted.

(21) Pursuant to NDAC Section 43-05-01-05 (1)(b)(2)(j) the application is required to provide the location, orientation, and properties of known or suspected faults and fractures that may transect the confining zone in the area of review, and a determination that they would not interfere with containment.

Pursuant to NDAC Section 43-05-01-05 (1)(b)(2)(k) the application must include data on the depth, areal extent, thickness, mineralogy, porosity, permeability, and capillary pressure of the injection and confining zone, including facies changes based on field data, which may include geologic cores, outcrop data, seismic surveys, well logs, and names and lithologic descriptions.

Pursuant to NDAC Section 43-05-01-05 (1)(b)(2)(l) the application is required to provide geomechanical information on fractures, stress, ductility, rock strength, and in situ fluid pressures within the confining zone. The confining zone must be free of transmissive faults or fractures and of sufficient areal extent and integrity to contain the injected carbon dioxide stream.

Pursuant to NDAC Section 43-05-01-05 (1)(b)(2)(o) the application is required to identify and characterize additional strata overlying the storage reservoir that will prevent vertical fluid movement, are free of transmissive faults or fractures, allow for pressure dissipation, and provide additional opportunities for monitoring, mitigation, and remediation. There are no requirements to include the 2D or 3D seismic lines in the application.

(22) The Commission believes Minnkota's testimony sufficiently addresses the appearance of vertical features in acoustic impedance volumes and in the geologic model cross section.

(23) The Commission notes "Linear Geologic Surface Features" on nd.gov/gis/apps/HubExplorerV2 are river channels and a glacial ice margin.

(24) Minnkota's application provides adequate data to show suitability of the Black Island and Deadwood Formations for geologic storage of carbon dioxide in the facility area.

(25) Minnkota's application provides adequate modeling of the storage reservoir for delineation of the facility area, and adequate monitoring to detect if carbon dioxide is migrating into properties outside of the facility area pursuant to NDAC Section 43-05-01-11.4. Vertical release of carbon dioxide is addressed by the application pursuant to NDAC Section 43-05-01-13, and lateral release of carbon dioxide from the facility area is addressed by the application pursuant to NDAC Section 43-05-01-05.

(26) The amalgamated storage reservoir pore space to be utilized is not hydrocarbon bearing as determined from test data included with the application. There has been no historic hydrocarbon exploration or production from formations below the Black Island and Deadwood Formations within the proposed facility area. Lignite coal is mined from the Sentinel Butte Formation above the proposed facility area. Coal seams exist in the Bullion Creek Formation. All coal seams present in the Fort Union Group above the facility area will not be impacted by this project as there are no current or future planned mining activities at the location of the wells. The lateral extent of the stabilized plume is large enough to prevent drilling for hydrocarbon exploration in interior sections within the facility area, under the Black Island and Deadwood Formations, without penetrating the stored carbon dioxide. While Minnkota does not foresee an operator drilling through the carbon dioxide plume, they acknowledge controls would need to be in place to consider it for any potential future exploration that would penetrate the storage reservoir.

(27) Minnkota's Milton R. Young Station is a two-unit mine-mouth lignite coal-fired power plant located in Oliver County, North Dakota, near the city of Center. The lignite used as fuel for electrical generation is the source of the carbon dioxide.

(28) Up to 4,300,000* metric tons of carbon dioxide will be captured annually from the Milton R. Young Station. The captured carbon dioxide will be dehydrated, compressed, transported to a Class VI well by a flow line, and then injected. Up to 1,170,000 metric tons of carbon dioxide will be injected into the Black Island and Deadwood Formations annually.

(29) The entire length of flow line to be utilized for carbon dioxide transportation from the capture facility to the wellhead falls within the facility area delineation and is under the jurisdiction of the Commission.

(30) Minnkota submitted supplemental information regarding the flow line. The information contained in the supplement is from a FEED study performed by Burns & McDonnell and materials and contractors have not been selected. When a final construction plan is issued, Minnkota will submit notice of intent a minimum of seven days prior to commencing construction on a form containing all required and requested information in accordance with NDAC Section 43-02-03-29.1. Maximum operating pressure is expected to be 1,690 psi.

(31) The flow line will be equipped with a DAS/DSS/DTS fiber optic cable to detect leaks.

(32) The projected composition of the carbon dioxide stream is greater than 99.9% carbon dioxide with trace quantities of water, nitrogen, argon, oxygen, sulfur dioxide, nitrogen dioxide, and nitric dioxide.

(33) The proposed McCall #1 well will be tested, logged, and constructed to Class VI requirements, to be located 1,978 feet from the north line and 257 feet from the west line of Section 4, Township 141 North, Range 83 West, Oliver County, North Dakota.

(35) The proposed NRDT #1 well is to be located 2,148 feet from the south line and 691 feet from the east line of Section 34, Township 142 North, Range 83 West, Oliver County, North Dakota. This well is to be utilized as a direct method of monitoring the injection zone pursuant to NDAC Section 43-05-01-11.4.

(36) Minnkota created a geologic model based on site characterization as required by NDAC Section 43-05-01-05.1 to delineate the area of review. Data utilized included well log, seismic, and core data. Well log data was used to pick formation tops, interpret lithology, estimate petrophysical properties, and determine a time-depth shift for seismic data in the Deadwood B Member, the lower confining zone, the Icebox Formation, the upper confining zone, and the Black Island and Deadwood Formations, the injection formations. Geostatistics were used to distribute petrophysical properties throughout the confining zones. Seismic data was used to reinforce interpolation of the formation tops to create structural surfaces, and to distribute lithologies and geologic properties in the model. Based on the reservoir pressure obtained from the J-LOC #1 (Well No. 37380), critical threshold pressure for this storage facility will be reached in the Black Island and Deadwood Formations during injection. Critical threshold pressure has the same meaning as pressure front, defined in NDAC Section 43-05-01-01, for area of review delineation purposes. The predicted extent of the pressure front from beginning to end of life of the project, at the time that injection ceases, was used to define the area of review in this case.

*Originally stated 4,000,000

(37) The area proposed to be included within the storage facility is as follows:

TOWNSHIP 142 NORTH, RANGE 84 WEST

THE S/2 SE/4 OF SECTION 35, AND THE S/2 OF SECTION 36,

TOWNSHIP 142 NORTH, RANGE 83 WEST

ALL OF SECTIONS 28, 29, 31, 32, 33 AND 34, THE SE/4 SE/4 OF SECTION 19, THE SE/4 AND S/2 SW/4 OF SECTION 20, THE S/2 AND S/2 N/2 OF SECTION 21, THE SW/4 NW/4, W/2 SW/4, AND SE/4 SW/4 OF SECTION 22, THE SW/4 AND SW/4 SE/4 OF SECTION 26, THE W/2, SE/4, AND W/2 NE/4 OF SECTION 27, THE E/2, E/2 SW/4, AND SE/4 NW/4 OF SECTION 30, AND THE W/2, NE/4, AND W/2 SE/4 OF SECTION 35,

TOWNSHIP 141 NORTH, RANGE 84 WEST

ALL OF SECTIONS 1 AND 12, THE E/2, E/2 SW/4, AND E/2 E/2 NW/4 OF SECTION 2, AND THE NE/4, E/2 NW/4, AND NE/4 SE/4 OF SECTION 13,

TOWNSHIP 141 NORTH, RANGE 83 WEST

ALL OF SECTIONS 2, 3, 4, 5, 6, 7, 8, 9, 10, 16, 17 AND 18, THE W/2 SW/4 OF SECTION 1, THE W/2, NE/4, W/2 SE/4, AND NE/4 SE/4 OF SECTION 11, THE W/2 NW/4, NE/4 NW/4, AND NW/4 SW/4 OF SECTION 12, THE N/2 NW/4, SE/4 NW/4, NW/4 NE/4, W/2 SW/4 NW/4, AND NE/4 SW/4 NW/4 OF SECTION 14, THE N/2 N/2, SE/4 NE/4, AND SW/4 NW/4 OF SECTION 15, THE N/2 N/2, SE/4 NW/4, AND SE/4 NE/4 OF SECTION 19, THE N/2 OF SECTION 20, AND THE W/2, W/2 NE/4, AND NW/4 SE/4 OF SECTION 21.

(38) The Black Island and Deadwood Formations, the upper confining Icebox Formation, and the lower confining Deadwood B Member are laterally extensive through the area of review.

(39) The Black Island Formation directly overlies the Deadwood Formation. Core analysis of the Black Island and Deadwood Formations shows sufficient permeability to be suitable for the desired injection rates and pressures without risk of creating fractures in the injection zone. Thin-section investigation shows the Deadwood Formation is comprised of fine to medium grained sandstone and several interbeds of dolostone and limestone. Thin-section analysis of the sandstone intervals shows quartz is dominant, with minor occurrences of feldspar, dolomite, and calcite as cements. Distinct carbonate intervals were noted. The first is a fine to medium grained dolostone with quartz and calcite present. The second consists of fine-grained limestone with dolomite and quartz present. Microfracture testing in the J-LOC #1 (Well No. 37380) well, near, but outside of the delineated facility area, at a depth of 9,885 feet determined the breakdown pressure of the formation to be 8,231 psi, with a fracture propagation pressure of 7,450 psi, and a fracture closure pressure of 7,393 psi. Microfracture in situ tests were attempted in the J-ROC1 #1 (File No. 37672) well, but because of unstable wellbore conditions, the MDT stress tool run was not performed after a near-loss of the tool in the wellbore. Microfracture testing is proposed for the Deadwood Formation within the facility area, to be submitted to the Commission for review prior to injection of carbon dioxide.

Core analysis of the overlying Icebox Formation shows sufficiently low permeability to stratigraphically trap carbon dioxide and displaced fluids. Thin-section investigation shows the

Icebox Formation is comprised primarily of shale. Microfracture testing in the J-LOC #1 (Well No. 37380) well, near, but outside of the delineated facility area, at depths of 9,749 and 9,751 feet observed no formation breakdown with a maximum of 10,985 psi and 10,867 psi applied, respectively. Microfracture tests were attempted in the J-ROC1 #1 (File No. 37672) well, but because of unstable wellbore conditions, the MDT stress tool run was not performed after a near-loss of the tool in the wellbore. Microfracture testing is proposed for the Icebox Formation within the facility area, to be submitted to the Commission for review prior to injection of carbon dioxide.

Core analysis of the underlying Deadwood B Member shows sufficiently low permeability to stratigraphically contain carbon dioxide and displaced fluids. Thin-section investigation shows the Deadwood B Member is comprised of carbonates and shale facies. The carbonates were comprised of calcite minerals, fossils, feldspar, and quartz.

(40) The in situ fluid of the Black Island and Deadwood Formations in this area is in excess of 10,000 parts per million of total dissolved solids.

(41) Investigation of wells within the area of review found no vertical penetrations of the confining or injection zones requiring corrective action. The area of review will be reevaluated at a period not to exceed five years from beginning of injection operations.

(42) The Fox Hills Formation is the deepest underground source of drinking water (USDW) within the area of review. Its base is situated at a depth of 1,225 feet at the location of the proposed injection well, leaving approximately 8,053 feet between the base of the Fox Hills Formation and the top of the Black Island Formation.

(43) Fluid sampling of shallow USDWs has been performed to establish a geochemical baseline, with additional baseline sampling proposed for the Fox Hills Formation and other shallow wells under investigation. Future sampling is proposed in Minnkota's application pursuant to NDAC Section 43-05-01-11.4.

(44) Soil sampling is proposed pursuant to NDAC Section 43-05-01-11.4. A baseline of soil gas concentrations will be established and submitted to the Commission for review prior to injection operations. Soil gas profile stations will be located off of the well pads near the J-ROC1 #1 (Well No. 37672), near the Herbert Dresser #1-34 (Well No. 4937), and near the proposed NRDT-1 monitoring well.

(45) The top of the Red River Formation is at 8,455 feet, approximately 7,230 feet below the base of the Fox Hills Formation and it provides an additional zone of monitoring between the Fox Hills Formation and the Black Island and Deadwood Formations to detect vertical carbon dioxide or fluid movement.

(46) Fluid samples from the Inyan Kara Formation and Broom Creek Formation suggest that they are hydraulically isolated from each other, supporting that the confining formations above the Broom Creek Formation are not compromised by migration pathways. The Broom Creek and Inyan Kara Formations provide additional zones of monitoring between the Fox Hills Formation and the Black Island and Deadwood Formations to detect vertical carbon dioxide or fluid movement.

(47) No known or suspected regional faults or fractures with transmissibility have been identified during the site-specific characterization. Features within the Icebox Formation are primarily related to compaction, with no presence of natural fractures. Closed-tension fractures were observed in the Deadwood B Member and commonly coincident with compaction features. Compaction features are parallel to bedding and commonly filled with clay minerals, reducing porosity. One high angle thrust fault in the Precambrian was identified within the area of review that vertically terminates well below the injection and confining zones. The Deadwood A Member sands overly the Precambrian, and will not be injected into, preventing pressure exposure that could create failure on the fault.

(48) Geochemical simulation performed with the injection stream and data obtained from the injection zone determined approximately an 8% increase in cumulative injection potential. Conservatively high carbon dioxide exposure simulations to the cap rock determined that geochemical changes will be minor and will not cause substantive deterioration compromising confinement.

(49) Risk of induced seismicity is not a concern based on existing studies of major faults within the area of review, tectonic boundaries, and relatively stable geologic conditions surrounding the proposed injection site.

(50) Both the injection and monitoring wells are equipped with DTS fiber optic cables enabling continuously monitored external mechanical integrity. The proposed McCall #1 injector will have an annual temperature log run on the casing string that is not equipped with DTS fiber optic cable to meet the external mechanical integrity requirements of NDAC Section 43-05-01-11.1.

(51) The approval of this application is in the public interest by promoting the policy stated in NDCC Section 38-22-01.

IT IS THEREFORE ORDERED:

(1) The creation of the Minnkota Center MRYS Deadwood Storage Facility #1 in Oliver County, North Dakota, is hereby authorized and approved.

(2) Minnkota Power Cooperative, Inc., its assigns and successors, is hereby authorized to store carbon dioxide in the Black Island and Deadwood Formations in the Minnkota Center MRYS Deadwood Storage Facility #1.

(3) The Minnkota Center MRYS Deadwood Storage Facility #1 shall extend to and include the following lands in Oliver County, North Dakota:

TOWNSHIP 142 NORTH, RANGE 84 WEST
THE S/2 SE/4 OF SECTION 35, AND THE S/2 OF SECTION 36,

TOWNSHIP 142 NORTH, RANGE 83 WEST
ALL OF SECTIONS 28, 29, 31, 32, 33 AND 34, THE SE/4 SE/4 OF SECTION 19, THE SE/4 AND S/2 SW/4 OF SECTION 20, THE S/2 AND S/2 N/2 OF SECTION 21, THE

SW/4 NW/4, W/2 SW/4, AND SE/4 SW/4 OF SECTION 22, THE SW/4 AND SW/4 SE/4 OF SECTION 26, THE W/2, SE/4, AND W/2 NE/4 OF SECTION 27, THE E/2, E/2 SW/4, AND SE/4 NW/4 OF SECTION 30, AND THE W/2, NE/4, AND W/2 SE/4 OF SECTION 35,

TOWNSHIP 141 NORTH, RANGE 84 WEST

ALL OF SECTIONS 1 AND 12, THE E/2, E/2 SW/4, AND E/2 E/2 NW/4 OF SECTION 2, AND THE NE/4, E/2 NW/4, AND NE/4 SE/4 OF SECTION 13,

TOWNSHIP 141 NORTH, RANGE 83 WEST

ALL OF SECTIONS 2, 3, 4, 5, 6, 7, 8, 9, 10, 16, 17 AND 18, THE W/2 SW/4 OF SECTION 1, THE W/2, NE/4, W/2 SE/4, AND NE/4 SE/4 OF SECTION 11, THE W/2 NW/4, NE/4 NW/4, AND NW/4 SW/4 OF SECTION 12, THE N/2 NW/4, SE/4 NW/4, NW/4 NE/4, W/2 SW/4 NW/4, AND NE/4 SW/4 NW/4 OF SECTION 14, THE N/2 N/2, SE/4 NE/4, AND SW/4 NW/4 OF SECTION 15, THE N/2 N/2, SE/4 NW/4, AND SE/4 NE/4 OF SECTION 19, THE N/2 OF SECTION 20, AND THE W/2, W/2 NE/4, AND NW/4 SE/4 OF SECTION 21.

(4) Injection into the Minnkota Center MRYS Deadwood Storage Facility #1 shall not occur until Minnkota Power Cooperative, Inc. has met the financial responsibility demonstration pursuant to Order No. 31588, Case No. 29034.

(5) This authorization does not convey authority to inject carbon dioxide into the Minnkota Center MRYS Deadwood Storage Facility #1; an approved permit to inject for the proposed McCall #1 shall be issued by the Commission prior to injection operations commencing.

(6) The authorization granted herein is conditioned on the operator receiving and complying with all provisions of the injection permit issued by the Oil and Gas Division of the Industrial Commission, and complying with all provisions of NDAC Chapter 43-05-01 where applicable, and this order.

(7) Definitions.

“Area of review” in this case means the delineated extent of the reservoir where injection activities through the life of the project will create sufficient pressure increase to drive formation fluids into a USDW through a potential conduit.

“Cell” in this case means individual cell blocks of the geologic model; each cell is approximately 500 feet by 500 feet.

“Facility area” means the areal extent of the storage reservoir as defined in paragraph (3) above, that includes lands within the lateral boundary of the carbon dioxide plume from beginning of injection to the time the carbon dioxide plume ceases to migrate into adjacent geologic model cells.

“Storage facility” means the reservoir, underground equipment, and surface facilities and equipment used or proposed to be used in the geologic storage operation. It does not include pipelines used to transport carbon dioxide to the storage facility under NDCC Section 38-22-02.

(8) The storage facility operator shall comply with all conditions of this order, the permit to inject, and NDAC Chapter 43-05-01, where applicable. Any noncompliance constitutes a violation and is grounds for enforcement action, including but not limited to termination, revocation, or modification of this order pursuant to NDAC Section 43-05-01-12.

(9) In an administrative action, it shall not be a defense that it would have been necessary for the storage facility operator to halt or reduce the permitted activity in order to maintain compliance with this order, the permit to inject, and NDAC Chapter 43-05-01, where applicable.

(10) The storage facility operator shall take all reasonable steps to minimize or correct any adverse impact on the environment resulting from noncompliance with this order, the permit to inject, and NDAC Chapter 43-05-01, where applicable.

(11) The storage facility operator shall implement and maintain the provided emergency and remedial response plan pursuant to NDAC Section 43-05-01-13.

(12) The storage facility operator shall cease injection immediately, take all steps reasonably necessary to identify and characterize any release, implement the emergency and remedial response plan approved by the Commission, and notify the Commission within 24 hours of carbon dioxide detected above the confining zone.

(13) The storage facility operator shall at all times properly operate and maintain all storage facilities which are installed or used by the storage facility operator to achieve compliance with the conditions of this order, the permit to inject, and NDAC Chapter 43-05-01, where applicable. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of backup or auxiliary facilities or similar systems only when necessary to achieve compliance.

(14) This order may be modified, revoked and reissued, or terminated pursuant to NDAC Section 43-05-01-12. The filing of a request by the storage facility operator for and order modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance, does not stay any condition contained therein.

(15) The injection well permit or the permit to operate an injection well does not convey any property rights of any sort of any exclusive privilege.

(16) The storage facility operator shall furnish to the Director, within a time specified, any information which the Director may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this order, or to determine compliance thereof. The storage facility operator shall also furnish to the Director, upon request, copies of records required to be kept by this order, the permit to inject, and NDAC Chapter 43-05-01, where applicable.

(17) The storage facility operator shall allow the Director, or an authorized representative, upon presentation of credentials and other documents as may be required by law, to:

- (a) Enter upon the storage facility premises where records must be kept pursuant to this order and NDAC Chapter 43-05-01.

- (b) At reasonable times, have access to and copy any records that must be kept pursuant to this order and NDAC Chapter 43-05-01.
- (c) At reasonable times, inspect any facilities, equipment, including monitoring and control equipment, practices, or operations regulated or required pursuant to this order, the permit to inject, and NDAC Chapter 43-05-01.
- (d) At reasonable times, sample or monitor for the purposes of assuring compliance, any substances or parameters at any location.

(18) The storage facility operator shall maintain and comply with the proposed testing and monitoring plan pursuant to NDAC Section 43-05-01-11.4

(19) The storage facility operator shall comply with the reporting requirements provided in NDAC Section 43-05-01-18. The volume of carbon dioxide injected, the average injection rate, surface injection pressure, and down-hole temperature and pressure data shall be reported monthly to the Director on or before the fifth day of the second succeeding month once injection commences regardless of the status of operations, until the injection well is properly plugged and abandoned.

(20) The storage facility operator must obtain an injection well permit under NDAC Section 43-05-01-10 and injection wells must meet the construction and completion requirements in NDAC Section 43-05-01-11.

(21) The storage facility operator shall notify the Director at least 48 hours in advance to witness a mechanical integrity test of the tubing-casing annulus in the injection well. The packer must be set within 100 feet of the upper most perforation and in the 13CR-80 casing, as an exception to NDAC Section 43-05-01-11. However, the packer must also be set within confining zone lithology, within carbon dioxide resistant cement, and not interfere down-hole monitoring equipment.

(22) The storage facility operator shall maintain and comply with the prepared plugging plan pursuant to NDAC Section 43-05-01-11.5.

(23) The storage facility operator shall establish mechanical integrity prior to commencing injection and maintain mechanical integrity pursuant to NDAC Section 43-05-01-11.1.

(24) The storage facility operator shall implement the worker safety plan pursuant to NDAC Section 43-05-01-13.

(25) The storage facility operator shall comply with leak detection and reporting requirements pursuant to NDAC Section 43-05-01-14.

(26) The storage facility operator shall implement the proposed corrosion monitoring and prevention program pursuant to NDAC Section 43-05-01-05.1.

(27) The storage facility operator shall maintain financial responsibility pursuant to NDAC Section 43-05-01-09.1.

(28) The storage facility operator shall maintain and comply with the proposed post-injection site care and facility closure plan pursuant to NDAC Section 43-05-01-19.

(29) The storage facility operator shall notify the Director within 24 hours of failure or malfunction of surface or bottom hole gauges in the proposed McCall #1 injector.

(30) The storage facility operator shall implement surface air and soil gas monitoring as proposed.

(31) This storage facility authorization and permit shall be reviewed at least once every five years from commencement of injection to determine whether it should be modified, revoked, or minor modification made, pursuant to NDAC Section 43-05-01-05.1(4).

(32) The storage facility operator shall pay fees pursuant to NDAC Section 43-05-01-17 annually, no more than thirty days after the receipt of 26 U.S. Code § 45Q tax credits, unless otherwise approved by the Director.

(33) This order shall remain in full force and effect until further order of the Commission.

Dated this 21st day of January, 2022.

INDUSTRIAL COMMISSION
STATE OF NORTH DAKOTA

/s/ Doug Burgum, Governor

/s/ Wayne Stenehjem, Attorney General

/s/ Doug Goehring, Agriculture Commissioner

BEFORE THE INDUSTRIAL COMMISSION
OF THE STATE OF NORTH DAKOTA

CASE NO. 29032
ORDER NO. 31586

IN THE MATTER OF A HEARING CALLED ON A MOTION OF THE COMMISSION TO CONSIDER THE APPLICATION OF MINNKOTA POWER COOPERATIVE, INC. REQUESTING CONSIDERATION FOR THE GEOLOGIC STORAGE OF CARBON DIOXIDE IN THE DEADWOOD FORMATION FROM THE MILTON R. YOUNG STATION LOCATED IN SECTIONS 35 AND 36, T.142N., R.84W., SECTIONS 19, 20, 21, 22, 26, 27, 28, 29, 30, 31, 32, 33, 34 AND 35, T.142N., R.83W., SECTIONS 1, 2, 12 AND 13, T.141N., R.84W., SECTIONS 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 17, 18, 19, 20 AND 21, T.141N., R.83W., OLIVER COUNTY, ND PURSUANT TO NDAC SECTION 43-05-01.

ORDER OF THE COMMISSION

THE COMMISSION FINDS:

- (1) This cause came on for hearing at 9:00 a.m. on the 2nd day of November, 2021.
- (2) Minnkota Power Cooperative, Inc. (Minnkota) made application to the Commission for an order authorizing geologic storage of carbon dioxide from the Milton R. Young Station in the amalgamated storage reservoir pore space of the Deadwood Formation, in portions of Sections 35 and 36, Township 142 North, Range 84 West, Sections 19, 20, 21, 22, 26, 27, 28, 29, 30, 31, 32, 33, 34, and 35, Township 142 North, Range 83 West, Sections 1, 2, 12, and 13, Township 141 North, Range 84 West, Sections 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 17, 18, 19, 20, and 21, Township 141 North, Range 83 West, Oliver County, North Dakota, pursuant to North Dakota Administrative Code (NDAC) 43-05-01, and such other relief as is appropriate.
- (3) Minnkota submitted an application for a Storage Facility Permit and necessary attachments pursuant to NDAC Section 43-05-01-05 and all other provisions of NDAC Chapter 43-05-01 as necessary.
- (4) Case Nos. 29029, 29030, 29031, 29032, 29033, and 29034 were combined for the purposes of hearing.

(5) Case No. 29029, also on today's docket, is an application by Minnkota for an order authorizing geologic storage of carbon dioxide from the Milton R. Young Station in the amalgamated pore space of the Broom Creek Formation in portions of Sections 35 and 36, Township 142 North, Range 84 West, Sections 19, 20, 21, 22, 26, 27, 28, 29, 30, 31, 32, 33, 34, and 35, Township 142 North, Range 83 West, Sections 1, 2, 12, and 13, Township 141 North, Range 84 West, Sections 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 17, 18, 19, 20, and 21, Township 141 North, Range 83 West, Oliver County, North Dakota, pursuant to NDAC Chapter 43-05-01.

(6) Case No. 29030, also on today's docket, is an application filed with the Commission by Minnkota for an order of the Commission determining the amalgamation of storage reservoir pore space, pursuant to a Geologic Storage Agreement for use of pore space falling within portions of Sections 35 and 36, Township 142 North, Range 84 West, Sections 19, 20, 21, 22, 26, 27, 28, 29, 30, 31, 32, 33, 34, and 35, Township 142 North, Range 83 West, Sections 1, 2, 12, and 13, Township 141 North, Range 84 West, Sections 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 17, 18, 19, 20, and 21, Township 141 North, Range 83 West, Oliver County, North Dakota in the Broom Creek Formation, has been signed, ratified, or approved by owners of interest owning at least sixty percent of the pore space interest within said lands pursuant to North Dakota Century Code (NDCC) Section 38-22-10.

(7) Case No. 29031, also on today's docket, is a motion of the Commission to determine the amount of financial responsibility for the geologic storage of carbon dioxide from the Milton R. Young Station located in portions of Sections 35 and 36, Township 142 North, Range 84 West, Sections 19, 20, 21, 22, 26, 27, 28, 29, 30, 31, 32, 33, 34, and 35, Township 142 North, Range 83 West, Sections 1, 2, 12, and 13, Township 141 North, Range 84 West, Sections 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 17, 18, 19, 20, and 21, Township 141 North, Range 83 West, Oliver County, North Dakota in the Broom Creek Formation, pursuant to NDAC Section 43-05-01-09.1.

(8) Case No. 29033, also on today's docket, is an application filed with the Commission by Minnkota for an order of the Commission determining the amalgamation of storage reservoir pore space, pursuant to a Geologic Storage Agreement for use of pore space falling within portions of Sections 35 and 36, Township 142 North, Range 84 West, Sections 19, 20, 21, 22, 26, 27, 28, 29, 30, 31, 32, 33, 34, and 35, Township 142 North, Range 83 West, Sections 1, 2, 12, and 13, Township 141 North, Range 84 West, Sections 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 17, 18, 19, 20, and 21, Township 141 North, Range 83 West, Oliver County, North Dakota in the Deadwood Formation, has been signed, ratified, or approved by owners of interest owning at least sixty percent of the pore space interest within said lands pursuant to NDCC Section 38-22-10.

(9) Case No. 29034, also on today's docket, is a motion of the Commission to determine the amount of financial responsibility for the geologic storage of carbon dioxide from the Milton R. Young Station located in portions Sections 35 and 36, Township 142 North, Range 84 West, Sections 19, 20, 21, 22, 26, 27, 28, 29, 30, 31, 32, 33, 34, and 35, Township 142 North, Range 83 West, Sections 1, 2, 12, and 13, Township 141 North, Range 84 West, Sections 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 17, 18, 19, 20, and 21, Township 141 North, Range 83 West, Oliver County, North Dakota in the Deadwood Formation, pursuant to NDAC Section 43-05-01-09.1

(10) Commission staff requested to take administrative notice of the well files and geophysical logs of all wells within or nearby the area of review, to which Minnkota had no objection.

(11) The record in these matters was left open to receive additional information from Minnkota. Such information was received on November 16, December 8, and December 10, 2021, and the record was closed.

(12) Pursuant to NDCC Section 38-22-06 and NDAC Section 43-05-01-08: The notice of filing of the application and petition and the time and place of hearing thereof was given, and that at least 45 days prior to the hearing, Minnkota, as the applicant, did give notice of the time and place of said hearing and the Commission has accepted the notice as adequate, and that the applicant did, at least 45 days prior to the hearing, file with the Commission engineering, geological and other technical exhibits to be used and which were used at said hearing, and that the notice so given did specify that such material was filed with the Commission; that due public notice having been given, as required by law, the Commission has jurisdiction of this cause and the subject matter.

(13) The Commission gave at least a thirty-day public notice and comment period for the draft storage facility permit and issued all notices using methods required to all entities under NDCC Section 38-22-06 and NDAC Section 43-05-01-08. Publication was made September 29, 2021, and the comment period for written comments ended at 5:00 PM CDT November 1, 2021. The hearing was open to the public to appear and provide comments.

(14) The Commission received a letter from the State Historical Society of North Dakota on October 22, 2021 indicating it reviewed the application of Minnkota and recommends a Class III (pedestrian survey) in the project area for the proposed monitoring well. Minnkota agrees to take the activity of performing a Class III pedestrian survey and State Historic Preservation Office issuance of a determination of effect, prior to commencing construction on the well pad, as a condition precedent of the drilling permit for the NRDT-1 monitoring well.

(15) The Commission received a letter from the Dakota Resource Council (DRC) on November 1, 2021 indicating concern with the safety of this project. DRC states there should be more robust regulation around carbon storage that will ensure that blow outs and leakage cannot occur. DRC is concerned with Appendix E of the filed application indicating loss of mechanical integrity injection wells-tubing/packer leak being classified as serious and likely to occur. DRC states if this were to occur, it could greatly affect both the natural and human environment and if this were a chronic problem, it could potentially derail the entire project and waste millions in taxpayer dollars. DRC is concerned that if the leakage were large enough, it could poison the surrounding air and ecosystem and greatly harm the health of people within the area.

DRC states research shows the injection of carbon dioxide has the potential for causing small scale earthquakes that can rupture the seal of carbon storage. DRC notes that two Stanford scientists recently concluded that while injection from CCS is unlikely to trigger large earthquakes, even small earthquakes from the injection process can break the seal of a carbon dioxide repository. DRC states the injection process of carbon dioxide storage is incredibly risky and the geologic report for this permit and top scientists agree with these findings. DRC states

this is likely why there are no internationally recognized standards for monitoring and verifying that carbon dioxide sinks will remain underground.

DRC recommends that there is an internationally recognized system of monitoring and steps that are taken to ensure every risk in the geologic report is classified as unlikely before this permit is approved.

(16) Minnkota testified the tubing could leak based on experience, and such an event would be serious and impact the project economically because they would have to stop injection to replace the tubing or patch the casing. Minnkota testified that with this risk scenario, there is no loss of containment. Minnkota testified that there are controls in place listed along with the risk assessment, and that the risk likelihood is without the controls in place. The radius of influence from a large carbon dioxide release from the wellhead was analyzed by Minnkota. The release would be limited to approximately 2,153 feet at a concentration of 5,000 ppm with conservative wind factors, and occupied dwellings would not fall within this radius.

Minnkota testified for an earthquake to occur, there would need to be a fault present and have indicated there are no faults present within the storage reservoir or upper or lower confining zones. Minnkota testified that the reservoirs and their associated injection pressures do not pose a risk for inducing movement in the identified Precambrian basement fault to create a small or large earthquake. Minnkota testified microseismic events caused by injection created fractures will not be created due to the regulatory bottom hole pressure constraint of 90% of fracture pressure. Minnkota testified it uses the fracture pressure gradient of the injection formation. Minnkota included data showing it was unable to get the upper confining zone to break down to get a fracture pressure at 10,985 and 10,867 psi, but the injection reservoir broke down at 8,231 psi.

(17) The Commission has rules and regulations in place to safeguard against tubing leaks or blowouts. NDAC Section 43-05-01-11(10) requires all tubing strings must meet the standards contained in subsection 6. All tubing must be new tubing or reconditioned tubing of a quality equivalent to new tubing and that has been pressure-tested. For new tubing, the pressure test conducted at the manufacturing mill or fabrication plant may be used to fulfill this requirement.

NDAC Section 43-05-01-11(11) requires all wellhead components, including the casinghead and tubing head, valves, and fittings, must be made of steel having operating pressure ratings sufficient to exceed the maximum injection pressures computed at the wellhead and to withstand the corrosive nature of carbon dioxide. Each flow line connected to the wellhead must be equipped with a manually operated positive shutoff valve located on or near the wellhead.

NDAC Section 43-05-01-11(12) requires all packers, packer elements, or similar equipment critical to the containment of carbon dioxide must be of a quality to withstand exposure to carbon dioxide.

NDAC Section 43-05-01-11(14) requires all newly drilled wells must establish internal and external mechanical integrity as specified by the Commission and demonstrate continued mechanical integrity through periodic testing as determined by the Commission. All other wells to be used as injection wells must demonstrate mechanical integrity as specified by the

Commission prior to use for injection and be tested on an ongoing basis as determined by the Commission.

NDAC Section 43-05-01-11(17) requires all injection wells must be equipped with shutoff systems designed to alert the operator and shut-in wells when necessary.

(18) The Commission has rules and regulations in place requiring the operator to demonstrate seismicity will not interfere with containment and prohibiting fracturing of the injection zone. NDAC Section 43-05-01-05(1)(b)(2)(m) requires the applicant must provide information on the seismic history, including the presence and depth of seismic sources and a determination that the seismicity would not interfere with containment.

NDAC Section 43-05-01-11.3(1) requires, except during stimulation, the storage operator shall ensure that injection pressure does not exceed ninety percent of the fracture pressure of the injection zone so as to ensure that the injection does not initiate new fractures or propagate existing fractures in the injection zone. Injection pressure must never initiate fractures in the confining zone or cause the movement of injection or formation fluids that endanger an underground source of drinking water. All stimulation programs are subject to the Commission's approval as part of the storage facility permit application and incorporated into the permit.

(19) The Commission received a letter from CCUS Consultant Geoscientist, Daniel R. Zebrowski (Zebrowski) on October 29, 2021 stating Minnkota's permit application does not comply with NDCC Chapter 38-22 and NDAC Chapter 43-05-01 and that there is potential for leakage of the carbon dioxide from the injection formation. Zebrowski states that failure of the carbon dioxide storage facility could allow for contamination of the near surface freshwater aquifers and surface water features. Additionally, that technical data presented by Minnkota to the North Dakota Industrial Commission reveal incomplete evaluation of geologic data, engineering data, and 2D and 3D geophysical data to properly assess and characterize the confinement formation and injection formations and lower confinement formations as described in their permit application.

Zebrowski references the seismic data collected by Minnkota and states they have failed to display any geophysical maps constructed and calibrated with existing well data for subsurface formations. Zebrowski states it is imperative the Commission reviews such geophysical data, interpretations, and maps to fully understand the geological setting across the storage facility area and the proposed injection site location to ensure the cap-rock and containment formations do not have faults which breach both and would allow for carbon dioxide to escape and contaminate freshwater aquifers.

Zebrowski states Minnkota failed to display any 2D or 3D seismic data from the surface to the basement within the storage facility and area of review in support of their carbon dioxide storage permit application. Zebrowski questions why Minnkota completed required work and then did not display final products in support of the storage facility permit application, and why no 3D seismic lines which directly tie the proposed injection well were depicted to the Commission in support of the carbon dioxide storage application. Zebrowski states four 2D seismic lines were acquired and processed which directly tie the proposed injection well yet none of this data is utilized in support of the carbon dioxide storage facility permit application and depicted for the

Commission. Zebrowski states that additional 2D seismic legacy data is available within the storage facility area.

Zebrowski states Minnkota has displayed partial lines (250'-400' of data out of over 9,000' of data) from two different 3D seismic impedance volumes which only depict the Icebox Formation and the Black Island and Deadwood Formations. Zebrowski states utilizing the limited amount of impedance 3D seismic data presented in support of the carbon dioxide storage facility permit application allows for one to interpret several faults within the Icebox, Black Island, and Deadwood Formations. Zebrowski states the applicant states an evaluation has been completed from the Deadwood Formation to freshwater aquifers, and that 3D seismic data and interpretations displayed to the Commission are incomplete and lack technical merit for the Commission to make a reasonable evaluation of the carbon dioxide storage container integrity. Zebrowski states one can clearly depict near vertical faults within the Icebox, Black Island, and Deadwood Formations utilizing the applicant's 3D seismic data.

Zebrowski states the applicant directly accepts a much higher degree of risk for carbon dioxide storage facility failure of the cap-rock and injection formations by withholding critical scientific data and the Commission should not allow the State of North Dakota to accept additional risk of a carbon dioxide storage facility containment failure.

Zebrowski includes images of Figure 2-7 from Minnkota's application. Zebrowski provided edited images from Minnkota's application, captioned Figure 2-7, Figure 2-7(a), and Figure 2-7(b). On Figure 2-7 Zebrowski asks where are formation tie in points? On Figure 2-7(a) Zebrowski states Icebox, Black Island, and Deadwood 3D seismic structure and isopach maps are not presented, and that they should have been included in support of the carbon dioxide storage permit application. Zebrowski claims this data is required to effectively evaluate the storage facility area and integrity. Zebrowski states that without this data, the North Dakota Industrial Commission will be making a carbon dioxide storage facility permit decision based solely on subsurface well control data, and thus why acquire 2D and 3D seismic data? On Figure 2-7(b) Zebrowski states that data is missing above the Icebox Formation and below the Precambrian. Zebrowski states that interpretation of the limited 3D impedance lines depicts several near vertical faults within the Deadwood Formation, and such faults are typical for the Williston Basin. Zebrowski states the faults interpreted may also breach the cap-rock formation. Zebrowski asks why 3D seismic data above and the Icebox Formation below the Deadwood Formation have been removed? Zebrowski states that deliberately covering up 3D seismic data from a permit application leads to suspicion of the applicant's interpretations of the data.

Zebrowski states the applicant projects a direct well tie via synthetic seismogram on Figure 2-7 (west 3D seismic survey), and that no formation tops are displayed on the synthetic trace from the well log data for the J-LOC #1. Zebrowski asks where is the top and base of the Icebox, Black Island, and Deadwood Formations displayed on the synthetic seismogram? Zebrowski states that it could be asked from the amount of data displayed, if this is the Icebox and Deadwood Formations? Zebrowski states that the applicant has not proven the seismic data displayed is the top and base of the Icebox, Black Island and Deadwood Formations. Zebrowski states that seismic frequencies of the synthetic trace are much higher than the actual 3D seismic data displayed and are not an exact seismic tie and can lead to mis-ties of both 2D and 3D seismic data.

Zebrowski states no 3D seismic data and synthetic seismogram ties from the J-ROC1 #1 wellbore are depicted in the permit application. Zebrowski states data quality at the J-ROC1 #1 is probably poor which does not allow for a direct synthetic seismogram tie of the 3D seismic data and well log data from the J-ROC1 #1 and J-LOC #1 depict different stratigraphy at the top of the Deadwood Formation and asks if the Black Island and Deadwood Formations are displayed in Figure 2-7.

Zebrowski states the permit application indicates additional seismic surveys within the area of review to monitor the carbon dioxide plume for this potential carbon dioxide storage facility site. Zebrowski asks why budget money if there is no intention to display data, interpretation, and results.

Zebrowski references a report, “North Dakota Integrated Carbon Storage Complex Feasibility Study” and states there are no geophysical maps or 3D seismic lines in it. Zebrowski includes Figure A-5 from the report and states they are displayed to inform the Commission of how some data can be interpreted differently and what is stated may not necessarily be correct. Zebrowski states the figure is captioned “Map view of seismic amplitude time slice through the Broom Creek Formation with interpreted geobodies. High amplitude values (blue) caused by thin bed tuning indicate the blue amplitude are interdunal carbonates.” Zebrowski states the caption is incorrect and does not indicate the blue amplitude are interdunal carbonates. Zebrowski states thin bed tuning relates to the ability of seismic data to resolve the top and base of a seismic event. Zebrowski states as the thickness between the top and base decrease the seismic character will not be able to resolve top and base thickness. Zebrowski states one must have an existing well (none depicted in figure) with a sonic log and porosity logs directly tied to each seismic event to justify that statement. Zebrowski states a more reasonable interpretation is the positive amplitude events (blue) depicted are a shale/siltstone within the Deadwood [sic] Formation and the amplitude scale varies within the formation which makes it appear there are three separate geologic features, when it is one formation or geologic feature. Zebrowski states the fourth blue amplitude created in Figure A-5 is not defined as an interdunal carbonate.

Zebrowski includes Figure B-10 and B-10(a) from the same report. Zebrowski references Figure B-10(a) and states a partial interpretation of the same time slice clearly depicts a fault with a NE to SW orientation adjacent to the Flemmer-1 wellbore. Zebrowski states the features within the orange boundaries appear to be additional faults and are not a channel feature as stated. Zebrowski states channel features can usually be distinguished by a contrast from the outer edges (overbank-channel area) of a channel, not from the middle as has been suggested while viewing time slice data. Zebrowski asks, “How can the middle of a channel contrast (same rock-stratigraphy)?” Zebrowski states one can see stripping effects (acquisition footprint) within this 3D seismic data set.

Zebrowski includes Figure B-11, from an uncited source, stating it depicts a combination of 3D vertical seismic line with an associated time slice. Zebrowski states the figure was included to demonstrate to the Commission one can identify both faults and channels utilizing existing 3D seismic data. Zebrowski notes the channel displayed on the time slice is recognized by the overbank-channel contrast, and that both positive and negative amplitudes are demonstrated in this example. Zebrowski states, “The faults have zero amplitudes (white) depicted, are in the middle of a fault.”

Zebrowski states the Department of Energy (DOE) has utilized time slice data for past carbon dioxide projects. Zebrowski references an article published by DOE in 2013 “Time-lapse surface seismic inversion with thin bed resolution for monitoring carbon dioxide sequestration: A case study from Cranfield, Mississippi” depicting several time slices. Zebrowski includes Figure #3 from the article and states it depicts four time slices of the Tuscaloosa injection zone across the entire 3D seismic survey. Zebrowski states the first time slice is pre-injection of carbon dioxide, the second post injection of carbon dioxide. Zebrowski states one can easily recognize the difference in the seismic data from carbon dioxide as stated in the article. Zebrowski adds one can easily recognize at least one major fault within the area of review, trending in a NW to SE orientation. Zebrowski includes Figure #4(a) from the article and states it depicts a portion of the inline from the 3D seismic survey. Zebrowski states the inline extends the entire length of the 3D seismic survey and notes the fault can clearly be recognized on inline 1102. Zebrowski includes Figure #5 as a comparison of the amount of 3D seismic data the applicant has given the Commission to evaluate this carbon dioxide storage facility permit. Zebrowski states only the Tuscaloosa (injection zone) Formation is depicted in Figure #5.

Zebrowski states one can assume the 3D seismic data quality around the injection well is probably poor as there is a lake adjacent to the proposed carbon dioxide injection well and within the storage facility area. Zebrowski states without proper undershooting (acquisition) of the lake a large data gap at the surface will be observed on the 3D seismic data volume. Zebrowski includes Figure #8 and states it depicts similar large surface data gaps on the seismic line displayed.

Zebrowski includes Figure #6 and states it depicts one of the 3D impedance lines (Figure 2-7 (B-B')) taken from the applicant's storage facility permit application with a similar scale for appearance and comparison to Figure #5. Zebrowski states it is impossible for the Commission to evaluate the cap-rock and injection formation integrity of the storage facility area from this limited amount of data. Zebrowski states the applicant depicts less than 3.1% of the actual data of one strike line from the 3D seismic survey, and that 96.9% of the seismic line depicted in Figure 2-7 is missing.

Zebrowski references Figure #8 and includes Figure #8a, and states it depicts a Gulf Oil Company seismic line over Little Knife Field located in the Williston Basin which has been published several times. Zebrowski references Figure #8 and states it depicts the entire 2D seismic line. Zebrowski references Figure #8a and states it demonstrates the same amount of seismic data Minnkota depicts in the storage facility permit application. Zebrowski states the applicant has denied the Commission the opportunity to review and evaluate 2D and 3D seismic data acquired and processed specifically for this carbon dioxide storage facility permit application.

Zebrowski states the applicant should display several strike lines, dip lines and arbitrary lines from the 3D seismic volumes which display normal migrated (black and white wiggle trace filled) seismic data from surface to well below the Precambrian in support of this carbon dioxide storage facility permit application. Zebrowski states several lines should directly tie the proposed injection and monitor wells, and that the applicant could also display several time slices of the 3D volume from 1.00 seconds to 1.40 seconds “(20 msec intervals)” wherein the Commission can have confidence the cap rock and injection formations are free of any faults

which might breach the formations and allow carbon dioxide to escape and contaminate freshwater aquifers.

Zebrowski states all 2D seismic data could also be displayed from surface to below the Precambrian with the carbon dioxide storage facility permit application. Zebrowski believes by including critical geophysical data requested above the Commission and public would have a higher degree of confidence of carbon dioxide containment in the proposed carbon dioxide storage facility area.

Zebrowski states the applicant has utilized DOE funds to characterize the proposed Tundra (CarbonSAFE III) carbon dioxide storage facility. Zebrowski states all data (including all geologic well data, 2D and 3D geophysical data, reports, simulations, etc.) are public record and can be obtained by any United States citizen. Zebrowski states the eastern 3D seismic survey and all 2D seismic lines are not proprietary (funded by DOE), and that the western 3D seismic survey appears to be licensed, but can be released to North Dakota government officials per the 3D seismic license agreement. Zebrowski states, "The applicant has yet to deposit any G&G data (well log, maps, seismic data, reports, simulations, etc.) from this research project to the EDX (Energy Data Exchange) repository operated by DOE/NETL for peer review and exchange of ideas."

Zebrowski supplies Figure #9 and states the applicant has failed to address the linear geologic surface feature which is within the 3D seismic survey outline, proposed carbon dioxide storage facility area and the area of review, approximately 1.2 miles from the proposed carbon dioxide injection well. Zebrowski states linear geologic surface features are usually associated with subsurface faults. Zebrowski states several linear geologic surface features are depicted on the North Dakota State Government website (nd.gov/gis/apps/HubExplorerV2/) within the area of review. Zebrowski states the applicant has stated no faults are present within the storage facility area and area of review. Zebrowski states a linear geologic surface feature could have a large subsurface fault(s) which potentially fault freshwater aquifers and extend several thousand feet below the surface.

Zebrowski supplies Figure #10 and states it depicts existing 2D seismic data over the proposed storage facility area which has not been depicted in this carbon dioxide storage facility permit application. Zebrowski states several long regional 2D seismic lines were probably licensed for the evaluation of this storage facility permit at the inception of this carbon dioxide sequestration project. Zebrowski states Figure #9 [sic] also depicts the approximate location of the storage facility area and 3D seismic survey locations along with the location of the linear geologic surface feature. Zebrowski states the existing 2D seismic data would be extremely important to assist the Commission in determining the vertical and horizontal extent of the Deadwood storage facility area. Zebrowski states the applicant could also depict the full migrated 2D seismic lines previously licensed to the Commission for review.

Zebrowski states the applicant may have licensed an existing regional 2D seismic line (81087-3983) which is an east-west line located approximately 2,200' south of the J-ROC1 #1 wellbore and within the storage facility area and the area of review. Zebrowski states this line extends over five miles east and five miles west of the proposed carbon dioxide injection well. Zebrowski states the applicant has not mentioned or displayed this line in the carbon dioxide storage facility permit application. Zebrowski states this line is required to assist in

characterization of the carbon dioxide storage facility area and the area of review in an east-west direction. Zebrowski states additional existing 2D seismic data may have also been licensed by the applicant within the storage facility area and area of review and are not depicted for this carbon dioxide storage facility permit application. Zebrowski states that if available from applicant, this data could be useful to fully evaluate the storage facility area and area of review for potential regional and localized faults.

Zebrowski includes Figure 2-14(a) and states it is the same lithofacies distribution model from the applicant's permit with an interpretation of several faults within the carbon dioxide storage facility area. Zebrowski states the interpreted faults appear to be associated with 2D and 3D seismic interpretations not depicted in the permit application. Zebrowski states the faults could easily extend much higher in the section as Precambrian is below the Deadwood and Icebox Formations, and that such faults could be associated linear basement features.

Zebrowski states pursuant to NDCC Chapter 38-22 (Carbon Dioxide Underground Storage) and NDAC Chapter 43-05-01 (Geologic Storage of Carbon Dioxide) the applicant has not presented all technical work required for the North Dakota Industrial Commission to make a comprehensive decision on the storage facility area and integrity from the carbon dioxide storage facility permit application. Zebrowski states applicant has withheld vital geologic and geophysical data, incorrectly displayed geologic and geophysical data, or did not acquire geological and geophysical data required in the permit application which could reduce the risk of a carbon dioxide storage facility failure.

Zebrowski claims the applicant has failed to comply with NDCC Section 38-22-08(1):

- 1.) Applicant has failed to provide and depict all characterization interpretations and correct detailed seismic data and interpretations, geologic/geophysical maps, and cross sections for a comprehensive evaluation of the carbon dioxide storage facility permit application as required by the State of North Dakota and the Commission.
- 2.) Applicant has failed to acquire MDT, FMI, or QuantaGeo logs at the proposed injection wellbore (J-ROC1 #1) location or within the carbon dioxide storage facility area as required by the State of North Dakota.
- 3.) Applicant has failed to address a linear geologic surface feature within the proposed storage facility area which usually indicate the presence of subsurface faults as required by the State of North Dakota.

Zebrowski claims the applicant has failed to comply with NDCC Section 38-22-08(2):

- 1.) Applicant has not demonstrated the storage facility is suitable and feasible for carbon dioxide injection and storage by withholding critical geological/geophysical maps and both 2D and 3D seismic data (strike lines, dip lines, arbitrary lines, time slices, etc.) for interpretation and inspection by the State of North Dakota and the Commission. Strike lines, dip lines, arbitrary lines, and time slices of 3D seismic volumes can easily verify the presence of faults (storage containment failure) within the storage facility area. Figure #2-7(b) depicts several interpreted faults within the Icebox Formation and Black Island and Deadwood Formations from the existing 3D seismic data set.

2.) Applicant has failed to run MDT logs over the confinement formation and injection b or any other formation at the proposed injection well location (J-ROC1 #1) or within the storage facility area. Applicant does not have any microfracture in situ stress tests from the J-ROC1 #1 wellbore and cannot determine formation pressures, high quality fluid samples, and permeability anisotropy within the storage facility area as required by the State of North Dakota and the Commission. Applicant projects incomplete MDT data from a wellbore located over 4.5 miles (outside the proposed storage facility area) from the proposed carbon dioxide injection wellbore (J-ROC1 #1) wherein geologic conditions (depth, stratigraphy, structure, dip rates, pressure, etc.) have changed above the cap rock formations, within the cap rock formations, within the injection formation, and below the injection formation. Applicant has failed to demonstrate the storage facility is suitable and feasible for carbon dioxide injection and storage. Applicant failed to run an FMI or QuantaGeo log in the proposed injection wellbore (J-ROC1 #1) which can demonstrate faults and fractures above the cap rock formations, within the cap rock formations, within the injection formation and below the injection formations.

3.) Applicant has failed to demonstrate the storage facility is suitable and feasible for carbon dioxide injection and storage.

Zebrowski claims the applicant has failed to comply with NDCC Section 38-22-08(8):

1.) Applicant has withheld detailed structure and isopach maps of the confining and injection formations constructed from existing 2D and 3D seismic data from the carbon dioxide storage facility permit application. This data can be directly calibrated to geological well data from the proposed injection well. Applicant has withheld 2D and 3D seismic data (lines, time slices, etc.) from the Commission and public. Applicant states no faults are present in the area of review area but do not provide any evidence to the Commission to support such statement. Figure 2-7(b) clearly depicts several interpreted faults within the storage facility area and contrast with the applicant's statement. Applicant could easily provide such evidence to support their statement by making several inlines, cross lines, and arbitrary lines from the migrated 3D seismic volume (surface to below Precambrian) to the Commission. Applicant could also display time-slices from above the cap-rock formation through the injection formations at "20 msec." intervals utilizing the entire 3D seismic volumes. This data is required to confirm that carbon dioxide will not escape from the storage reservoir within the storage facility area. Applicant has failed to confirm from all geologic, geophysical, and engineering data that carbon dioxide will not escape from the storage reservoir.

2.) Zebrowski reiterates that the applicant has failed to run MDT logs and an FMI or QuantaGeo log in the proposed injection wellbore (J-ROC1 #1).

Zebrowski claims the applicant has failed to comply with NDCC Section 38-22-06(10):

1.) Applicant's permit clearly has a higher degree of containment failure risk which will clearly endanger human health and endanger the environment (permanent contamination of freshwater aquifers and surface water ponds, lakes, and streams). Faults are present within confinement and injection zones.

2.) Applicant has not addressed linear geologic surface features (which are usually associated with faults) within the carbon dioxide storage facility area and the area of review. Surface/near-surface fault(s) could extend downward through freshwater aquifers into deeper formations. Carbon dioxide could escape confinement and travel through a series of faults to freshwater aquifers and surface water (lakes, streams, etc.) If carbon dioxide escapes and makes its way to the surface it will collect in surface sink areas and could potentially kill all human and wildlife within surface sink areas.

Zebrowski claims the applicant has failed to comply with NDCC Section 38-22-08(11):

1.) At the present, the applicant's carbon dioxide storage permit application is not in the public interest as the risk of carbon dioxide storage facility containment failure clearly outweighs the removal of carbon dioxide from the atmosphere. Applicant has failed to provide and depict all characterization data, interpretations, and maps for a comprehensive evaluation by the State of North Dakota and the Commission of the carbon dioxide storage facility area and area of review.

Zebrowski claims the applicant has failed to comply with NDCC Section 38-22-08(12):

1.) Applicant has not demonstrated the storage reservoir has been defined. The vertical boundaries have not been determined directly over the proposed injection wellsite, storage facility area, and a substantial portion of the area of review (storage reservoir). Applicant has withheld critical geological/geophysical maps and both 2D and 3D seismic data for interpretation and inspection by the State of North Dakota and the Commission. Applicant has not provided accurate detailed structure maps and isopach maps of the cap rock formations and injection formation which define the vertical and horizontal extent of the potential carbon dioxide reservoir. Applicant has not depicted any seismic data (2D or 3D) which depicts both the cap rock formation and the injection formation in this application. Applicant has only depicted maps constructed from existing well control for the horizontal and vertical boundaries of the storage reservoir. Applicant has not addressed interpreted faults depicted in Figure 2-7(b). Applicant has not defined the horizontal and vertical boundaries of the storage reservoir utilizing all existing and required scientific data. Zebrowski reiterates that the applicant has failed to run MDT logs on the proposed injection wellbore (JROC-1) and without formation pressure data the applicant cannot define the horizontal and vertical boundaries of the storage reservoir as required by the State of North Dakota.

Zebrowski claims, "The applicant has failed to comply with NDAC Section 43-05-01(C-4) Geologic Exhibits i."

1.) Applicant has failed to depict accurate well log cross sections which depict the structural configuration of the storage reservoir. Zebrowski references Figure 2-12b and states it depicts two cartoon structure cross sections which are not accurate. The cross sections are not displayed relative to sea level and do not indicate true formation dips of the geologic conditions at the storage reservoir in a cross-section view. Regional well log structure maps (Figure 2-13) are depicted in subsea depths while both cross sections depicted in Figure 2-12b are in measured depth or true vertical depth, not subsea depth. Accurate structural cross sections could assist in identification of existing faults within the carbon dioxide

storage facility area and area of review. Zebrowski states the applicant has failed to comply with accurate structural cross sections as required by the State of North Dakota.

Zebrowski claims, “The applicant has failed to comply with NDAC Section 43-05-01(C-4) Geologic Exhibits j.”

1.) Zebrowski references Figure 2-7(b) and states it depicts several interpreted faults within the injection zone that appear to transect the confining zone. Zebrowski states additional 2D and 3D seismic data must be displayed to confirm the extent and orientation of faults within the carbon dioxide storage facility area and area of review. Zebrowski reiterates the applicant has failed to address a linear geologic surface feature approximately 1.2 miles from the proposed injection well. Zebrowski states this linear geologic surface feature is probably related to a large subsurface fault within the storage facility area and area of review. Zebrowski states the near surface freshwater aquifers could be faulted and that the faults could also extend several thousand feet below surface. Zebrowski reiterates the applicant has failed to run MDT logs at the proposed injection well location (J-ROC1 #1) or within the storage facility area. Zebrowski states the applicant projects incomplete MDT data from a wellbore located over 4.5 miles from the proposed carbon dioxide injection wellbore (J-ROC1 #1). Zebrowski reiterates the applicant has failed to run an FMI or QuantaGeo log in the proposed injection wellbore (J-ROC1 #1) which can demonstrate faults and fractures within the cap rock formations, injection formation, below the injection formation, and within the storage facility area. Zebrowski states the applicant has no log data within the storage facility area to determine if fractures or faults exist. Zebrowski states the applicant cannot definitively state no fractures or faults are present in the storage facility area without this data.

Zebrowski claims, “The applicant has failed to comply with NDAC Section 43-05-01(C-4) Geologic Exhibits k.” Zebrowski reiterates the applicant has not provided seismic data, addressed faults depicted in Figure 2-7(b), and addressed linear geologic surface features. Zebrowski reiterates the applicant has failed to run MDT logs over formations at the J-ROC1 #1.

Zebrowski states, “The applicant has failed to comply with NDAC Section 43-05-01(C-4) Geologic Exhibits L.” Zebrowski reiterates the applicant has not run MDT logs and an FMI or QuantaGeo log in the J-ROC1 #1.

Zebrowski states he does not object to carbon dioxide sequestration and that his goal is to assist in evaluations from a public perspective and help reduce risk of potential carbon dioxide containment failures. Zebrowski states the applicant could easily remedy most of the deficiencies with additional time and completed work products suggested and required by the State of North Dakota. Zebrowski states the applicant could not receive a Class VI (UIC) injection well permit from the EPA with incomplete data (No MDT, FMI or QuantaGeo log) as demonstrated in this carbon dioxide storage facility permit application.

Zebrowski, considering the evidence depicted within his letter, urges (on behalf of several surface owners within the carbon dioxide storage facility area) the North Dakota Industrial Commission to reject Minnkota Power Cooperative, Inc’s storage facility permit (Case No. 29032) until such time the applicant fulfills all requirements set forth by the State of North Dakota in NDCC Chapter 38-22 and NDAC Chapter 43-05-01. Zebrowski states the applicant

has burdened the State of North Dakota with additional containment failure risks with an incomplete application that does not comply with North Dakota State Law. Zebrowski states it would be extremely unfortunate if carbon dioxide injection begins and immediately escapes the Black Island and Deadwood Formations.

(20) Minnkota testified it believes it is in complete compliance with the statutes and regulations, and that comments made by Zebrowski stating the application does not comply with NDCC Chapter 38-22 and NDAC Chapter 43-05-01, are an opinion.

Minnkota testified that the seismic interpretation was completed from the Precambrian basement up through the Pierre Formation and that this interpretation included structural surfaces, including the reservoirs of interest and confining layers. Minnkota testified this was included in the model which was provided to the Commission as part of the application. Minnkota testified in the Deadwood permit application, time structure maps were included that were constructed and calibrated using existing well data, particularly Figure 2-55 and Figure 2-59.

Minnkota testified having seismic data and displaying seismic data is not a requirement of the regulations, and that no data was withheld. Minnkota testified in the Deadwood application that Figure 2-57 shows a 3D seismic line tied to the J-ROC1 #1 well. Minnkota testified that 2D seismic lines were collected as part of the project and permit application and did not display them within the application since the four 2D lines are within the 3D seismic survey outline. Minnkota testified 2D information was not included in the model, only the 3D data was. Minnkota testified that 2D legacy seismic data was typically collected with lesser parameters than modern standards and that it purchased 28 miles of 2D legacy seismic data in this area. Minnkota testified such legacy data was purchased as part of the CarbonSAFE phase 2 feasibility study, conducted by the Energy and Environmental Research Center (EERC) in 2016. The datasets were deemed to have insufficient data quality in review, leading to performing additional 2D and 3D data acquisitions.

Minnkota testified impedance volumes displayed are using smooth seismic horizons as a framework, but that the initial model uses square grid blocks which are not able to capture the smoothness of the structure. Minnkota testified the square grid blocks arranged in a vertical orientation leave remaining artifacts in the final inversion results which present themselves as vertical features, but that those features are only artifacts. Minnkota testified that acoustic impedance volumes are not useful in interpreting structure and attempting to draw conclusions or interpreting a fault from this dataset is not a sound method for geophysical interpretation.

Minnkota testified that the data necessary has been provided to address various rules related to presence of any leakage pathways, lateral continuity of the formation, upper confining zones, thickness, structure, and structural features that have the potential to serve as fluid communication pathways, and structural or stratigraphic pinch outs in the region with figures in the application. Minnkota testified it can supply additional data if the Commission finds additional information relevant. Minnkota testified the inversion was focused on the reservoir which was displayed to show data used for the geologic model and that there was not a good inversion match above and below the reservoir.

Minnkota testified that well logs from the J-LOC #1 and J-ROC1 #1 were used to calibrate well log data to seismic data for both 3D seismic data sets, and BNI #1 log data was used for the western seismic data set. Minnkota testified data quality from the J-ROC1 #1 well was sufficient to tie the well to the seismic data and used the east-west 2D seismic line acquired to tie the western 3D seismic data set to the eastern data set. Minnkota testified this confirmed the well tie for the western 3D survey to the J-LOC #1 well and is in agreement with the independent well tie of the eastern 3D survey to the J-ROC1 #1 well.

Minnkota testified data sets referenced in paragraph 5 of page 4 and pages 5-7 of Zebrowski's comments were not used in this application as they were not connected to this application or the location under consideration. Minnkota testified the data sets referenced in Zebrowski's comments are related to a different location in Mercer County and some data is from a different state. Minnkota testified several figures are from different formations, depositional environments, and structural regimes and are not relevant to the application.

Minnkota testified surface infrastructure and obstacles such as Nelson Lake were considered in the design of the 3D survey and appropriately addressed through source and receiver line placement, and that the 3D seismic data was sufficient for interpreting and tying well log data to the seismic data for interpretation of the formations of interest.

Minnkota testified the linear geologic surface features are glacial features and not relevant to the deep subsurface geology. Minnkota testified freshwater sample data indicating faulting is unsubstantiated and that no supporting information was provided by Zebrowski. Minnkota testified that it and EERC reviewed available baseline freshwater sample data in the region and collected samples.

Minnkota testified vertical features in Figure 2-14 from their application are modeling artifacts at the edges of the seismic horizons put into the model as well as gentle structure from the seismic data, and that the artifacts and structure were amplified in appearance by vertical exaggeration.

Minnkota testified the implied failure to comply with statutory and regulatory requirements are an opinion by Zebrowski, and that he does not have the authority to make those conclusions. Minnkota testified an FMI log was run in the J-ROC1 #1 well, and that MDT was unable to be acquired. Minnkota testified an MDT log is not a requirement for the storage facility permit application, but is required prior to injection and will be performed and submitted.

(21) Pursuant to NDAC Section 43-05-01-05 (1)(b)(2)(j) the application is required to provide the location, orientation, and properties of known or suspected faults and fractures that may transect the confining zone in the area of review, and a determination that they would not interfere with containment.

Pursuant to NDAC Section 43-05-01-05 (1)(b)(2)(k) the application must include data on the depth, areal extent, thickness, mineralogy, porosity, permeability, and capillary pressure of the injection and confining zone, including facies changes based on field data, which may include geologic cores, outcrop data, seismic surveys, well logs, and names and lithologic descriptions.

Pursuant to NDAC Section 43-05-01-05 (1)(b)(2)(l) the application is required to provide geomechanical information on fractures, stress, ductility, rock strength, and in situ fluid pressures within the confining zone. The confining zone must be free of transmissive faults or fractures and of sufficient areal extent and integrity to contain the injected carbon dioxide stream.

Pursuant to NDAC Section 43-05-01-05 (1)(b)(2)(o) the application is required to identify and characterize additional strata overlying the storage reservoir that will prevent vertical fluid movement, are free of transmissive faults or fractures, allow for pressure dissipation, and provide additional opportunities for monitoring, mitigation, and remediation. There are no requirements to include the 2D or 3D seismic lines in the application.

(22) The Commission believes Minnkota's testimony sufficiently addresses the appearance of vertical features in acoustic impedance volumes and in the geologic model cross section.

(23) The Commission notes "Linear Geologic Surface Features" on nd.gov/gis/apps/HubExplorerV2 are river channels and a glacial ice margin.

(24) Minnkota's application provides adequate data to show suitability of the Black Island and Deadwood Formations for geologic storage of carbon dioxide in the facility area.

(25) Minnkota's application provides adequate modeling of the storage reservoir for delineation of the facility area, and adequate monitoring to detect if carbon dioxide is migrating into properties outside of the facility area pursuant to NDAC Section 43-05-01-11.4. Vertical release of carbon dioxide is addressed by the application pursuant to NDAC Section 43-05-01-13, and lateral release of carbon dioxide from the facility area is addressed by the application pursuant to NDAC Section 43-05-01-05.

(26) The amalgamated storage reservoir pore space to be utilized is not hydrocarbon bearing as determined from test data included with the application. There has been no historic hydrocarbon exploration or production from formations below the Black Island and Deadwood Formations within the proposed facility area. Lignite coal is mined from the Sentinel Butte Formation above the proposed facility area. Coal seams exist in the Bullion Creek Formation. All coal seams present in the Fort Union Group above the facility area will not be impacted by this project as there are no current or future planned mining activities at the location of the wells. The lateral extent of the stabilized plume is large enough to prevent drilling for hydrocarbon exploration in interior sections within the facility area, under the Black Island and Deadwood Formations, without penetrating the stored carbon dioxide. While Minnkota does not foresee an operator drilling through the carbon dioxide plume, they acknowledge controls would need to be in place to consider it for any potential future exploration that would penetrate the storage reservoir.

(27) Minnkota's Milton R. Young Station is a two-unit mine-mouth lignite coal-fired power plant located in Oliver County, North Dakota, near the city of Center. The lignite used as fuel for electrical generation is the source of the carbon dioxide.

(28) Up to 4,000,000 metric tons of carbon dioxide will be captured annually from the Milton R. Young Station. The captured carbon dioxide will be dehydrated, compressed, transported to a Class VI well by a flow line, and then injected. Up to 1,170,000 metric tons of carbon dioxide will be injected into the Black Island and Deadwood Formations annually.

(29) The entire length of flow line to be utilized for carbon dioxide transportation from the capture facility to the wellhead falls within the facility area delineation and is under the jurisdiction of the Commission.

(30) Minnkota submitted supplemental information regarding the flow line. The information contained in the supplement is from a FEED study performed by Burns & McDonnell and materials and contractors have not been selected. When a final construction plan is issued, Minnkota will submit notice of intent a minimum of seven days prior to commencing construction on a form containing all required and requested information in accordance with NDAC Section 43-02-03-29.1. Maximum operating pressure is expected to be 1,690 psi.

(31) The flow line will be equipped with a DAS/DSS/DTS fiber optic cable to detect leaks.

(32) The projected composition of the carbon dioxide stream is greater than 99.9% carbon dioxide with trace quantities of water, nitrogen, argon, oxygen, sulfur dioxide, nitrogen dioxide, and nitric dioxide.

(33) The proposed McCall #1 well will be tested, logged, and constructed to Class VI requirements, to be located 1,978 feet from the north line and 257 feet from the west line of Section 4, Township 141 North, Range 83 West, Oliver County, North Dakota.

(35) The proposed NRDT #1 well is to be located 2,148 feet from the south line and 691 feet from the east line of Section 34, Township 142 North, Range 83 West, Oliver County, North Dakota. This well is to be utilized as a direct method of monitoring the injection zone pursuant to NDAC Section 43-05-01-11.4.

(36) Minnkota created a geologic model based on site characterization as required by NDAC Section 43-05-01-05.1 to delineate the area of review. Data utilized included well log, seismic, and core data. Well log data was used to pick formation tops, interpret lithology, estimate petrophysical properties, and determine a time-depth shift for seismic data in the Deadwood B Member, the lower confining zone, the Icebox Formation, the upper confining zone, and the Black Island and Deadwood Formations, the injection formations. Geostatistics were used to distribute petrophysical properties throughout the confining zones. Seismic data was used to reinforce interpolation of the formation tops to create structural surfaces, and to distribute lithologies and geologic properties in the model. Based on the reservoir pressure obtained from the J-LOC #1 (Well No. 37380), critical threshold pressure for this storage facility will be reached in the Black Island and Deadwood Formations during injection. Critical threshold pressure has the same meaning as pressure front, defined in NDAC Section 43-05-01-01, for area of review delineation purposes. The predicted extent of the pressure front from beginning to end of life of the project, at the time that injection ceases, was used to define the area of review in this case.

(37) The area proposed to be included within the storage facility is as follows:

TOWNSHIP 142 NORTH, RANGE 84 WEST

THE S/2 SE/4 OF SECTION 35, AND THE S/2 OF SECTION 36,

TOWNSHIP 142 NORTH, RANGE 83 WEST

ALL OF SECTIONS 28, 29, 31, 32, 33 AND 34, THE SE/4 SE/4 OF SECTION 19, THE SE/4 AND S/2 SW/4 OF SECTION 20, THE S/2 AND S/2 N/2 OF SECTION 21, THE SW/4 NW/4, W/2 SW/4, AND SE/4 SW/4 OF SECTION 22, THE SW/4 AND SW/4 SE/4 OF SECTION 26, THE W/2, SE/4, AND W/2 NE/4 OF SECTION 27, THE E/2, E/2 SW/4, AND SE/4 NW/4 OF SECTION 30, AND THE W/2, NE/4, AND W/2 SE/4 OF SECTION 35,

TOWNSHIP 141 NORTH, RANGE 84 WEST

ALL OF SECTIONS 1 AND 12, THE E/2, E/2 SW/4, AND E/2 E/2 NW/4 OF SECTION 2, AND THE NE/4, E/2 NW/4, AND NE/4 SE/4 OF SECTION 13,

TOWNSHIP 141 NORTH, RANGE 83 WEST

ALL OF SECTIONS 2, 3, 4, 5, 6, 7, 8, 9, 10, 16, 17 AND 18, THE W/2 SW/4 OF SECTION 1, THE W/2, NE/4, W/2 SE/4, AND NE/4 SE/4 OF SECTION 11, THE W/2 NW/4, NE/4 NW/4, AND NW/4 SW/4 OF SECTION 12, THE N/2 NW/4, SE/4 NW/4, NW/4 NE/4, W/2 SW/4 NW/4, AND NE/4 SW/4 NW/4 OF SECTION 14, THE N/2 N/2, SE/4 NE/4, AND SW/4 NW/4 OF SECTION 15, THE N/2 N/2, SE/4 NW/4, AND SE/4 NE/4 OF SECTION 19, THE N/2 OF SECTION 20, AND THE W/2, W/2 NE/4, AND NW/4 SE/4 OF SECTION 21.

(38) The Black Island and Deadwood Formations, the upper confining Icebox Formation, and the lower confining Deadwood B Member are laterally extensive through the area of review.

(39) The Black Island Formation directly overlies the Deadwood Formation. Core analysis of the Black Island and Deadwood Formations shows sufficient permeability to be suitable for the desired injection rates and pressures without risk of creating fractures in the injection zone. Thin-section investigation shows the Deadwood Formation is comprised of fine to medium grained sandstone and several interbeds of dolostone and limestone. Thin-section analysis of the sandstone intervals shows quartz is dominant, with minor occurrences of feldspar, dolomite, and calcite as cements. Distinct carbonate intervals were noted. The first is a fine to medium grained dolostone with quartz and calcite present. The second consists of fine-grained limestone with dolomite and quartz present. Microfracture testing in the J-LOC #1 (Well No. 37380) well, near, but outside of the delineated facility area, at a depth of 9,885 feet determined the breakdown pressure of the formation to be 8,231 psi, with a fracture propagation pressure of 7,450 psi, and a fracture closure pressure of 7,393 psi. Microfracture in situ tests were attempted in the J-ROC1 #1 (File No. 37672) well, but because of unstable wellbore conditions, the MDT stress tool run was not performed after a near-loss of the tool in the wellbore. Microfracture testing is proposed for the Deadwood Formation within the facility area, to be submitted to the Commission for review prior to injection of carbon dioxide.

Core analysis of the overlying Icebox Formation shows sufficiently low permeability to stratigraphically trap carbon dioxide and displaced fluids. Thin-section investigation shows the

Icebox Formation is comprised primarily of shale. Microfracture testing in the J-LOC #1 (Well No. 37380) well, near, but outside of the delineated facility area, at depths of 9,749 and 9,751 feet observed no formation breakdown with a maximum of 10,985 psi and 10,867 psi applied, respectively. Microfracture tests were attempted in the J-ROC1 #1 (File No. 37672) well, but because of unstable wellbore conditions, the MDT stress tool run was not performed after a near-loss of the tool in the wellbore. Microfracture testing is proposed for the Icebox Formation within the facility area, to be submitted to the Commission for review prior to injection of carbon dioxide.

Core analysis of the underlying Deadwood B Member shows sufficiently low permeability to stratigraphically contain carbon dioxide and displaced fluids. Thin-section investigation shows the Deadwood B Member is comprised of carbonates and shale facies. The carbonates were comprised of calcite minerals, fossils, feldspar, and quartz.

(40) The in situ fluid of the Black Island and Deadwood Formations in this area is in excess of 10,000 parts per million of total dissolved solids.

(41) Investigation of wells within the area of review found no vertical penetrations of the confining or injection zones requiring corrective action. The area of review will be reevaluated at a period not to exceed five years from beginning of injection operations.

(42) The Fox Hills Formation is the deepest underground source of drinking water (USDW) within the area of review. Its base is situated at a depth of 1,225 feet at the location of the proposed injection well, leaving approximately 8,053 feet between the base of the Fox Hills Formation and the top of the Black Island Formation.

(43) Fluid sampling of shallow USDWs has been performed to establish a geochemical baseline, with additional baseline sampling proposed for the Fox Hills Formation and other shallow wells under investigation. Future sampling is proposed in Minnkota's application pursuant to NDAC Section 43-05-01-11.4.

(44) Soil sampling is proposed pursuant to NDAC Section 43-05-01-11.4. A baseline of soil gas concentrations will be established and submitted to the Commission for review prior to injection operations. Soil gas profile stations will be located off of the well pads near the J-ROC1 #1 (Well No. 37672), near the Herbert Dresser #1-34 (Well No. 4937), and near the proposed NRDT-1 monitoring well.

(45) The top of the Red River Formation is at 8,455 feet, approximately 7,230 feet below the base of the Fox Hills Formation and it provides an additional zone of monitoring between the Fox Hills Formation and the Black Island and Deadwood Formations to detect vertical carbon dioxide or fluid movement.

(46) Fluid samples from the Inyan Kara Formation and Broom Creek Formation suggest that they are hydraulically isolated from each other, supporting that the confining formations above the Broom Creek Formation are not compromised by migration pathways. The Broom Creek and Inyan Kara Formations provide additional zones of monitoring between the Fox Hills Formation and the Black Island and Deadwood Formations to detect vertical carbon dioxide or fluid movement.

(47) No known or suspected regional faults or fractures with transmissibility have been identified during the site-specific characterization. Features within the Icebox Formation are primarily related to compaction, with no presence of natural fractures. Closed-tension fractures were observed in the Deadwood B Member and commonly coincident with compaction features. Compaction features are parallel to bedding and commonly filled with clay minerals, reducing porosity. One high angle thrust fault in the Precambrian was identified within the area of review that vertically terminates well below the injection and confining zones. The Deadwood A Member sands overly the Precambrian, and will not be injected into, preventing pressure exposure that could create failure on the fault.

(48) Geochemical simulation performed with the injection stream and data obtained from the injection zone determined approximately an 8% increase in cumulative injection potential. Conservatively high carbon dioxide exposure simulations to the cap rock determined that geochemical changes will be minor and will not cause substantive deterioration compromising confinement.

(49) Risk of induced seismicity is not a concern based on existing studies of major faults within the area of review, tectonic boundaries, and relatively stable geologic conditions surrounding the proposed injection site.

(50) Both the injection and monitoring wells are equipped with DTS fiber optic cables enabling continuously monitored external mechanical integrity. The proposed McCall #1 injector will have an annual temperature log run on the casing string that is not equipped with DTS fiber optic cable to meet the external mechanical integrity requirements of NDAC Section 43-05-01-11.1.

(51) The approval of this application is in the public interest by promoting the policy stated in NDCC Section 38-22-01.

IT IS THEREFORE ORDERED:

(1) The creation of the Minnkota Center MRYS Deadwood Storage Facility #1 in Oliver County, North Dakota, is hereby authorized and approved.

(2) Minnkota Power Cooperative, Inc., its assigns and successors, is hereby authorized to store carbon dioxide in the Black Island and Deadwood Formations in the Minnkota Center MRYS Deadwood Storage Facility #1.

(3) The Minnkota Center MRYS Deadwood Storage Facility #1 shall extend to and include the following lands in Oliver County, North Dakota:

TOWNSHIP 142 NORTH, RANGE 84 WEST
THE S/2 SE/4 OF SECTION 35, AND THE S/2 OF SECTION 36,

TOWNSHIP 142 NORTH, RANGE 83 WEST

ALL OF SECTIONS 28, 29, 31, 32, 33 AND 34, THE SE/4 SE/4 OF SECTION 19, THE SE/4 AND S/2 SW/4 OF SECTION 20, THE S/2 AND S/2 N/2 OF SECTION 21, THE SW/4 NW/4, W/2 SW/4, AND SE/4 SW/4 OF SECTION 22, THE SW/4 AND SW/4 SE/4 OF SECTION 26, THE W/2, SE/4, AND W/2 NE/4 OF SECTION 27, THE E/2, E/2 SW/4, AND SE/4 NW/4 OF SECTION 30, AND THE W/2, NE/4, AND W/2 SE/4 OF SECTION 35,

TOWNSHIP 141 NORTH, RANGE 84 WEST

ALL OF SECTIONS 1 AND 12, THE E/2, E/2 SW/4, AND E/2 E/2 NW/4 OF SECTION 2, AND THE NE/4, E/2 NW/4, AND NE/4 SE/4 OF SECTION 13,

TOWNSHIP 141 NORTH, RANGE 83 WEST

ALL OF SECTIONS 2, 3, 4, 5, 6, 7, 8, 9, 10, 16, 17 AND 18, THE W/2 SW/4 OF SECTION 1, THE W/2, NE/4, W/2 SE/4, AND NE/4 SE/4 OF SECTION 11, THE W/2 NW/4, NE/4 NW/4, AND NW/4 SW/4 OF SECTION 12, THE N/2 NW/4, SE/4 NW/4, NW/4 NE/4, W/2 SW/4 NW/4, AND NE/4 SW/4 NW/4 OF SECTION 14, THE N/2 N/2, SE/4 NE/4, AND SW/4 NW/4 OF SECTION 15, THE N/2 N/2, SE/4 NW/4, AND SE/4 NE/4 OF SECTION 19, THE N/2 OF SECTION 20, AND THE W/2, W/2 NE/4, AND NW/4 SE/4 OF SECTION 21.

(4) Injection into the Minnkota Center MRYS Deadwood Storage Facility #1 shall not occur until Minnkota Power Cooperative, Inc. has met the financial responsibility demonstration pursuant to Order No. 31588, Case No. 29034.

(5) This authorization does not convey authority to inject carbon dioxide into the Minnkota Center MRYS Deadwood Storage Facility #1; an approved permit to inject for the proposed McCall #1 shall be issued by the Commission prior to injection operations commencing.

(6) The authorization granted herein is conditioned on the operator receiving and complying with all provisions of the injection permit issued by the Oil and Gas Division of the Industrial Commission, and complying with all provisions of NDAC Chapter 43-05-01 where applicable, and this order.

(7) Definitions.

“Area of review” in this case means the delineated extent of the reservoir where injection activities through the life of the project will create sufficient pressure increase to drive formation fluids into a USDW through a potential conduit.

“Cell” in this case means individual cell blocks of the geologic model; each cell is approximately 500 feet by 500 feet.

“Facility area” means the areal extent of the storage reservoir as defined in paragraph (3) above, that includes lands within the lateral boundary of the carbon dioxide plume from beginning of injection to the time the carbon dioxide plume ceases to migrate into adjacent geologic model cells.

“Storage facility” means the reservoir, underground equipment, and surface facilities and equipment used or proposed to be used in the geologic storage operation. It does not include pipelines used to transport carbon dioxide to the storage facility under NDCC Section 38-22-02.

(8) The storage facility operator shall comply with all conditions of this order, the permit to inject, and NDAC Chapter 43-05-01, where applicable. Any noncompliance constitutes a violation and is grounds for enforcement action, including but not limited to termination, revocation, or modification of this order pursuant to NDAC Section 43-05-01-12.

(9) In an administrative action, it shall not be a defense that it would have been necessary for the storage facility operator to halt or reduce the permitted activity in order to maintain compliance with this order, the permit to inject, and NDAC Chapter 43-05-01, where applicable.

(10) The storage facility operator shall take all reasonable steps to minimize or correct any adverse impact on the environment resulting from noncompliance with this order, the permit to inject, and NDAC Chapter 43-05-01, where applicable.

(11) The storage facility operator shall implement and maintain the provided emergency and remedial response plan pursuant to NDAC Section 43-05-01-13.

(12) The storage facility operator shall cease injection immediately, take all steps reasonably necessary to identify and characterize any release, implement the emergency and remedial response plan approved by the Commission, and notify the Commission within 24 hours of carbon dioxide detected above the confining zone.

(13) The storage facility operator shall at all times properly operate and maintain all storage facilities which are installed or used by the storage facility operator to achieve compliance with the conditions of this order, the permit to inject, and NDAC Chapter 43-05-01, where applicable. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of backup or auxiliary facilities or similar systems only when necessary to achieve compliance.

(14) This order may be modified, revoked and reissued, or terminated pursuant to NDAC Section 43-05-01-12. The filing of a request by the storage facility operator for and order modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance, does not stay any condition contained therein.

(15) The injection well permit or the permit to operate an injection well does not convey any property rights of any sort of any exclusive privilege.

(16) The storage facility operator shall furnish to the Director, within a time specified, any information which the Director may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this order, or to determine compliance thereof. The storage facility operator shall also furnish to the Director, upon request, copies of records required to be kept by this order, the permit to inject, and NDAC Chapter 43-05-01, where applicable.

(17) The storage facility operator shall allow the Director, or an authorized representative, upon presentation of credentials and other documents as may be required by law, to:

- (a) Enter upon the storage facility premises where records must be kept pursuant to this order and NDAC Chapter 43-05-01.
- (b) At reasonable times, have access to and copy any records that must be kept pursuant to this order and NDAC Chapter 43-05-01.
- (c) At reasonable times, inspect any facilities, equipment, including monitoring and control equipment, practices, or operations regulated or required pursuant to this order, the permit to inject, and NDAC Chapter 43-05-01.
- (d) At reasonable times, sample or monitor for the purposes of assuring compliance, any substances or parameters at any location.

(18) The storage facility operator shall maintain and comply with the proposed testing and monitoring plan pursuant to NDAC Section 43-05-01-11.4

(19) The storage facility operator shall comply with the reporting requirements provided in NDAC Section 43-05-01-18. The volume of carbon dioxide injected, the average injection rate, surface injection pressure, and down-hole temperature and pressure data shall be reported monthly to the Director on or before the fifth day of the second succeeding month once injection commences regardless of the status of operations, until the injection well is properly plugged and abandoned.

(20) The storage facility operator must obtain an injection well permit under NDAC Section 43-05-01-10 and injection wells must meet the construction and completion requirements in NDAC Section 43-05-01-11.

(21) The storage facility operator shall notify the Director at least 48 hours in advance to witness a mechanical integrity test of the tubing-casing annulus in the injection well. The packer must be set within 100 feet of the upper most perforation and in the 13CR-80 casing, as an exception to NDAC Section 43-05-01-11. However, the packer must also be set within confining zone lithology, within carbon dioxide resistant cement, and not interfere down-hole monitoring equipment.

(22) The storage facility operator shall maintain and comply with the prepared plugging plan pursuant to NDAC Section 43-05-01-11.5.

(23) The storage facility operator shall establish mechanical integrity prior to commencing injection and maintain mechanical integrity pursuant to NDAC Section 43-05-01-11.1.

(24) The storage facility operator shall implement the worker safety plan pursuant to NDAC Section 43-05-01-13.

(25) The storage facility operator shall comply with leak detection and reporting requirements pursuant to NDAC Section 43-05-01-14.

(26) The storage facility operator shall implement the proposed corrosion monitoring and prevention program pursuant to NDAC Section 43-05-01-05.1.

(27) The storage facility operator shall maintain financial responsibility pursuant to NDAC Section 43-05-01-09.1.

(28) The storage facility operator shall maintain and comply with the proposed post-injection site care and facility closure plan pursuant to NDAC Section 43-05-01-19.

(29) The storage facility operator shall notify the Director within 24 hours of failure or malfunction of surface or bottom hole gauges in the proposed McCall #1 injector.

(30) The storage facility operator shall implement surface air and soil gas monitoring as proposed.

(31) This storage facility authorization and permit shall be reviewed at least once every five years from commencement of injection to determine whether it should be modified, revoked, or minor modification made, pursuant to NDAC Section 43-05-01-05.1(4).

(32) The storage facility operator shall pay fees pursuant to NDAC Section 43-05-01-17 annually, no more than thirty days after the receipt of 26 U.S. Code § 45Q tax credits, unless otherwise approved by the Director.

(33) This order shall remain in full force and effect until further order of the Commission.

Dated this 21st day of January, 2022.

INDUSTRIAL COMMISSION
STATE OF NORTH DAKOTA

/s/ Doug Burgum, Governor

/s/ Wayne Stenehjem, Attorney General

/s/ Doug Goehring, Agriculture Commissioner

SFN 5729

STATE OF NORTH DAKOTA
COUNTY OF BURLEIGH

AFFIDAVIT OF MAILING

I, Jeanette Bean, being duly sworn upon oath, depose and say: That on 1/28/2022 enclosed in separate envelopes true and correct copies of the attached Order No. 31586 of the North Dakota Industrial Commission, and deposited the same with the United States Postal Service in Bismarck, North Dakota, with postage thereon fully paid, directed to the following persons by the Industrial Commission in Case No. 29032:

Lawrence Bender
Fredrikson & Byron
PO BOX 1855
Bismarck, ND 58502-1855

Dave Berger
2531 37th Ave SW
Center, ND 58530



Jeanette Bean
Oil & Gas Division

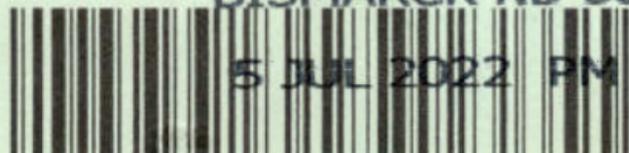
On this 1/28/2022 before me personally appeared Jeanette Bean to me known as the person described in and who executed the foregoing instrument and acknowledged that she executed the same as her free act and deed.

DAWN MARQUARDT
NOTARY PUBLIC
STATE OF NORTH DAKOTA
MY COMMISSION EXPIRES NOV. 09, 2025



Notary Public
State of North Dakota,
County of Burleigh

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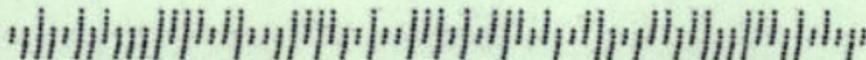
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- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

**MICKIE MCNULTY-EIDE
CLERK OF DISTRICT COURT/RECORDER
115 WEST MAIN STREET
CENTER ND 58530**



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2. Article Number (Transfer from service label)

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Linda Nelson Agent
 Addressee

B. Received by (Printed Name)

Linda Nelson

C. Date of Delivery

7/5/2022

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If YES, enter delivery address below: No

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Mickie McNulty-Eide

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Center, ND 58530**

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STATE OF NORTH DAKOTA
OFFICE OF ATTORNEY GENERAL
www.attorneygeneral.nd.gov
(701) 328-2210

Drew H. Wrigley
ATTORNEY GENERAL

**CIVIL LITIGATION
NATURAL RESOURCES
AND INDIAN AFFAIRS**
500 NORTH 9TH STREET
BISMARCK, ND 58501-4509
(701) 328-3640 FAX (701) 328-4300

June 29, 2022
via US Certified Mail

Mickie McNulty-Eide
Clerk of District Court/Recorder
PO Box 125
115 West Main
Center, ND 58530

Re: Filing of Minnkota Center MRYS Broom Creek Storage Facility #1 – Order No. 31583
Filing of Minnkota Center MRYS Deadwood Storage Facility #1 – Order No. 31586
Storage Facility Permit
Certificate of Issuance

Dear Ms. McNulty-Eide:

Enclosed for filing pursuant to North Dakota Century Code § 38-22-11 is the Certificate of Issuance and supporting Orders for the above referenced matters along with Check No. 54649784 to cover the recording fees.

The recorded documents can be returned to me at 500 North 9th Street, Bismarck, ND, 58501-4509. If you have any questions, you can reach me at 701 328-3640

Sincerely,

A handwritten signature in blue ink, appearing to read "SBN", written over a horizontal line.

Steven B. Nelson
Assistant Attorney General

SBN/mjh
Enclosures



INDUSTRIAL COMMISSION OF NORTH DAKOTA

Doug Burgum
Governor

Drew H. Wrigley
Attorney General

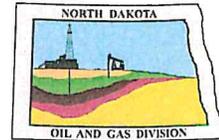
Doug Goehring
Agriculture Commissioner

I, Karlene Fine, Executive Director and Secretary to the Industrial Commission of North Dakota, do hereby certify that the attached copy of Order No. 31586 is a true and exact copy of Order No. 31586 on file in the Office of the Industrial Commission, State Capitol, Bismarck, North Dakota.



A handwritten signature in black ink, appearing to read "Karlene Fine".

Karlene Fine
Executive Director and Secretary to the Commission
June 17, 2022



June 13, 2022

**Minnkota Center MRYS Deadwood Storage Facility #1
Oliver, North Dakota
Order No. 31586
STORAGE FACILITY PERMIT
CERTIFICATE OF ISSUANCE**

Minnkota Power Cooperative, Inc. made application to the Commission, on May 28, 2021, for an order authorizing geologic storage of carbon dioxide from the Milton R. Young Station in the amalgamated storage reservoir pore space of the Deadwood Formation, in portions of Sections 35 and 36, Township 142 North, Range 84 West, Sections 19, 20, 21, 22, 26, 27, 28, 29, 30, 31, 32, 33, 34 and 35, Township 142 North, Range 83 West, Sections 1, 2, 12 and 13, Township 141 North, Range 84 West, Sections 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 17, 18, 19, 20 and 21, Township 141 North, Range 83 West, Oliver County, North Dakota, pursuant to North Dakota Administrative Code Section 43-05-01, and such other relief as is appropriate.

The Commission approved this application January 21, 2022:

Order No. 31586 is attached and establishes the Minnkota Center MRYS Deadwood Storage Facility #1 to include the following lands:

TOWNSHIP 142 NORTH, RANGE 84 WEST, 5TH PM
THE S/2 SE/4 OF SECTION 35, AND THE S/2 OF SECTION 36,

TOWNSHIP 142 NORTH, RANGE 83 WEST, 5TH PM
ALL OF SECTIONS 28, 29, 31, 32, 33 AND 34, THE SE/4 SE/4 OF SECTION 19, THE SE/4 AND S/2 SW/4 OF SECTION 20, THE S/2 AND S/2 N/2 OF SECTION 21, THE SW/4 NW/4, W/2 SW/4, AND SE/4 SW/4 OF SECTION 22, THE SW/4 AND SW/4 SE/4 OF SECTION 26, THE W/2, SE/4, AND W/2 NE/4 OF SECTION 27, THE E/2, E/2 SW/4, AND SE/4 NW/4 OF SECTION 30, AND THE W/2, NE/4, AND W/2 SE/4 OF SECTION 35,

TOWNSHIP 141 NORTH, RANGE 84 WEST, 5TH PM
ALL OF SECTIONS 1 AND 12, THE E/2, E/2 SW/4, AND E/2 E/2 NW/4 OF SECTION 2, AND THE NE/4, E/2 NW/4, AND NE/4 SE/4 OF SECTION 13,

TOWNSHIP 141 NORTH, RANGE 83 WEST, 5TH PM
ALL OF SECTIONS 2, 3, 4, 5, 6, 7, 8, 9, 10, 16, 17 AND 18, THE W/2 SW/4 OF SECTION 1, THE W/2, NE/4, W/2 SE/4, AND NE/4 SE/4 OF SECTION 11. THE W/2 NW/4, NE/4 NW/4, AND NW/4 SW/4 OF SECTION 12, THE N/2 NW/4, SE/4 NW/4, NW/4 NE/4, W/2 SW/4 NW/4, AND NE/4 SW/4 NW/4 OF SECTION 14, THE N/2 N/2, SE/4 NE/4, AND SW/4 NW/4 OF SECTION 15. THE N/2 N/2, SE/4 NW/4, AND SE/4 NE/4 OF SECTION 19. THE N/2 OF SECTION 20, AND THE W/2, W/2 NE/4, AND NW/4 SE/4 OF SECTION 21.

Order No. 31587 is attached and establishes amalgamation of the storage reservoir pore space.

Order No. 31588 is attached and establishes financial responsibility for the storage facility permit.

Pursuant to North Dakota Century Code Section 38-22-11, this certificate of issuance is to be filed with the county recorder in Oliver County.

Sincerely,



Lynn D. Helms

North Dakota Industrial Commission
Department of Mineral Resources
Oil and Gas Division



INDUSTRIAL COMMISSION OF NORTH DAKOTA

Doug Burgum
Governor

Drew H. Wrigley
Attorney General

Doug Goehring
Agriculture Commissioner

I, Karlene Fine, Executive Director and Secretary to the Industrial Commission of North Dakota, do hereby certify that the attached copy of Order No. 31586 issued in Case No. 29032 is a true and exact copy of Order No. 31586 on file in the Office of the Industrial Commission, State Capitol, Bismarck, North Dakota.



A handwritten signature in cursive script, appearing to read "Karlene Fine".

Karlene Fine
Executive Director and Secretary to the Commission
June 17, 2022

BEFORE THE INDUSTRIAL COMMISSION
OF THE STATE OF NORTH DAKOTA

CASE NO. 29032
ORDER NO. 31586

IN THE MATTER OF A HEARING CALLED ON
A MOTION OF THE COMMISSION TO
CONSIDER THE APPLICATION OF MINNKOTA
POWER COOPERATIVE, INC. REQUESTING
CONSIDERATION FOR THE GEOLOGIC
STORAGE OF CARBON DIOXIDE IN THE
DEADWOOD FORMATION FROM THE
MILTON R. YOUNG STATION LOCATED IN
SECTIONS 35 AND 36, T.142N., R.84W.,
SECTIONS 19, 20, 21, 22, 26, 27, 28, 29, 30, 31, 32,
33, 34 AND 35, T.142N., R.83W., SECTIONS 1, 2,
12 AND 13, T.141N., R.84W., SECTIONS 1, 2, 3, 4,
5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 17, 18, 19, 20
AND 21, T.141N., R.83W., OLIVER COUNTY,
ND PURSUANT TO NDAC SECTION 43-05-01.

ORDER OF THE COMMISSION

THE COMMISSION FINDS:

- (1) This cause came on for hearing at 9:00 a.m. on the 2nd day of November, 2021.
- (2) Minnkota Power Cooperative, Inc. (Minnkota) made application to the Commission for an order authorizing geologic storage of carbon dioxide from the Milton R. Young Station in the amalgamated storage reservoir pore space of the Deadwood Formation, in portions of Sections 35 and 36, Township 142 North, Range 84 West, Sections 19, 20, 21, 22, 26, 27, 28, 29, 30, 31, 32, 33, 34, and 35, Township 142 North, Range 83 West, Sections 1, 2, 12, and 13, Township 141 North, Range 84 West, Sections 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 17, 18, 19, 20, and 21, Township 141 North, Range 83 West, Oliver County, North Dakota, pursuant to North Dakota Administrative Code (NDAC) 43-05-01, and such other relief as is appropriate.
- (3) Minnkota submitted an application for a Storage Facility Permit and necessary attachments pursuant to NDAC Section 43-05-01-05 and all other provisions of NDAC Chapter 43-05-01 as necessary.
- (4) Case Nos. 29029, 29030, 29031, 29032, 29033, and 29034 were combined for the purposes of hearing.

(5) Case No. 29029, also on today's docket, is an application by Minnkota for an order authorizing geologic storage of carbon dioxide from the Milton R. Young Station in the amalgamated pore space of the Broom Creek Formation in portions of Sections 35 and 36, Township 142 North, Range 84 West, Sections 19, 20, 21, 22, 26, 27, 28, 29, 30, 31, 32, 33, 34, and 35, Township 142 North, Range 83 West, Sections 1, 2, 12, and 13, Township 141 North, Range 84 West, Sections 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 17, 18, 19, 20, and 21, Township 141 North, Range 83 West, Oliver County, North Dakota, pursuant to NDAC Chapter 43-05-01.

(6) Case No. 29030, also on today's docket, is an application filed with the Commission by Minnkota for an order of the Commission determining the amalgamation of storage reservoir pore space, pursuant to a Geologic Storage Agreement for use of pore space falling within portions of Sections 35 and 36, Township 142 North, Range 84 West, Sections 19, 20, 21, 22, 26, 27, 28, 29, 30, 31, 32, 33, 34, and 35, Township 142 North, Range 83 West, Sections 1, 2, 12, and 13, Township 141 North, Range 84 West, Sections 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 17, 18, 19, 20, and 21, Township 141 North, Range 83 West, Oliver County, North Dakota in the Broom Creek Formation, has been signed, ratified, or approved by owners of interest owning at least sixty percent of the pore space interest within said lands pursuant to North Dakota Century Code (NDCC) Section 38-22-10.

(7) Case No. 29031, also on today's docket, is a motion of the Commission to determine the amount of financial responsibility for the geologic storage of carbon dioxide from the Milton R. Young Station located in portions of Sections 35 and 36, Township 142 North, Range 84 West, Sections 19, 20, 21, 22, 26, 27, 28, 29, 30, 31, 32, 33, 34, and 35, Township 142 North, Range 83 West, Sections 1, 2, 12, and 13, Township 141 North, Range 84 West, Sections 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 17, 18, 19, 20, and 21, Township 141 North, Range 83 West, Oliver County, North Dakota in the Broom Creek Formation, pursuant to NDAC Section 43-05-01-09.1.

(8) Case No. 29033, also on today's docket, is an application filed with the Commission by Minnkota for an order of the Commission determining the amalgamation of storage reservoir pore space, pursuant to a Geologic Storage Agreement for use of pore space falling within portions of Sections 35 and 36, Township 142 North, Range 84 West, Sections 19, 20, 21, 22, 26, 27, 28, 29, 30, 31, 32, 33, 34, and 35, Township 142 North, Range 83 West, Sections 1, 2, 12, and 13, Township 141 North, Range 84 West, Sections 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 17, 18, 19, 20, and 21, Township 141 North, Range 83 West, Oliver County, North Dakota in the Deadwood Formation, has been signed, ratified, or approved by owners of interest owning at least sixty percent of the pore space interest within said lands pursuant to NDCC Section 38-22-10.

(9) Case No. 29034, also on today's docket, is a motion of the Commission to determine the amount of financial responsibility for the geologic storage of carbon dioxide from the Milton R. Young Station located in portions Sections 35 and 36, Township 142 North, Range 84 West, Sections 19, 20, 21, 22, 26, 27, 28, 29, 30, 31, 32, 33, 34, and 35, Township 142 North, Range 83 West, Sections 1, 2, 12, and 13, Township 141 North, Range 84 West, Sections 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 17, 18, 19, 20, and 21, Township 141 North, Range 83 West, Oliver County, North Dakota in the Deadwood Formation, pursuant to NDAC Section 43-05-01-09.1

(10) Commission staff requested to take administrative notice of the well files and geophysical logs of all wells within or nearby the area of review, to which Minnkota had no objection.

(11) The record in these matters was left open to receive additional information from Minnkota. Such information was received on November 16, December 8, and December 10, 2021, and the record was closed.

(12) Pursuant to NDCC Section 38-22-06 and NDAC Section 43-05-01-08: The notice of filing of the application and petition and the time and place of hearing thereof was given, and that at least 45 days prior to the hearing, Minnkota, as the applicant, did give notice of the time and place of said hearing and the Commission has accepted the notice as adequate, and that the applicant did, at least 45 days prior to the hearing, file with the Commission engineering, geological and other technical exhibits to be used and which were used at said hearing, and that the notice so given did specify that such material was filed with the Commission; that due public notice having been given, as required by law, the Commission has jurisdiction of this cause and the subject matter.

(13) The Commission gave at least a thirty-day public notice and comment period for the draft storage facility permit and issued all notices using methods required to all entities under NDCC Section 38-22-06 and NDAC Section 43-05-01-08. Publication was made September 29, 2021, and the comment period for written comments ended at 5:00 PM CDT November 1, 2021. The hearing was open to the public to appear and provide comments.

(14) The Commission received a letter from the State Historical Society of North Dakota on October 22, 2021 indicating it reviewed the application of Minnkota and recommends a Class III (pedestrian survey) in the project area for the proposed monitoring well. Minnkota agrees to take the activity of performing a Class III pedestrian survey and State Historic Preservation Office issuance of a determination of effect, prior to commencing construction on the well pad, as a condition precedent of the drilling permit for the NRDT-1 monitoring well.

(15) The Commission received a letter from the Dakota Resource Council (DRC) on November 1, 2021 indicating concern with the safety of this project. DRC states there should be more robust regulation around carbon storage that will ensure that blow outs and leakage cannot occur. DRC is concerned with Appendix E of the filed application indicating loss of mechanical integrity injection wells-tubing/packer leak being classified as serious and likely to occur. DRC states if this were to occur, it could greatly affect both the natural and human environment and if this were a chronic problem, it could potentially derail the entire project and waste millions in taxpayer dollars. DRC is concerned that if the leakage were large enough, it could poison the surrounding air and ecosystem and greatly harm the health of people within the area.

DRC states research shows the injection of carbon dioxide has the potential for causing small scale earthquakes that can rupture the seal of carbon storage. DRC notes that two Stanford scientists recently concluded that while injection from CCS is unlikely to trigger large earthquakes, even small earthquakes from the injection process can break the seal of a carbon dioxide repository. DRC states the injection process of carbon dioxide storage is incredibly risky and the geologic report for this permit and top scientists agree with these findings. DRC states

this is likely why there are no internationally recognized standards for monitoring and verifying that carbon dioxide sinks will remain underground.

DRC recommends that there is an internationally recognized system of monitoring and steps that are taken to ensure every risk in the geologic report is classified as unlikely before this permit is approved.

(16) Minnkota testified the tubing could leak based on experience, and such an event would be serious and impact the project economically because they would have to stop injection to replace the tubing or patch the casing. Minnkota testified that with this risk scenario, there is no loss of containment. Minnkota testified that there are controls in place listed along with the risk assessment, and that the risk likelihood is without the controls in place. The radius of influence from a large carbon dioxide release from the wellhead was analyzed by Minnkota. The release would be limited to approximately 2,153 feet at a concentration of 5,000 ppm with conservative wind factors, and occupied dwellings would not fall within this radius.

Minnkota testified for an earthquake to occur, there would need to be a fault present and have indicated there are no faults present within the storage reservoir or upper or lower confining zones. Minnkota testified that the reservoirs and their associated injection pressures do not pose a risk for inducing movement in the identified Precambrian basement fault to create a small or large earthquake. Minnkota testified microseismic events caused by injection created fractures will not be created due to the regulatory bottom hole pressure constraint of 90% of fracture pressure. Minnkota testified it uses the fracture pressure gradient of the injection formation. Minnkota included data showing it was unable to get the upper confining zone to break down to get a fracture pressure at 10,985 and 10,867 psi, but the injection reservoir broke down at 8,231 psi.

(17) The Commission has rules and regulations in place to safeguard against tubing leaks or blowouts. NDAC Section 43-05-01-11(10) requires all tubing strings must meet the standards contained in subsection 6. All tubing must be new tubing or reconditioned tubing of a quality equivalent to new tubing and that has been pressure-tested. For new tubing, the pressure test conducted at the manufacturing mill or fabrication plant may be used to fulfill this requirement.

NDAC Section 43-05-01-11(11) requires all wellhead components, including the casinghead and tubing head, valves, and fittings, must be made of steel having operating pressure ratings sufficient to exceed the maximum injection pressures computed at the wellhead and to withstand the corrosive nature of carbon dioxide. Each flow line connected to the wellhead must be equipped with a manually operated positive shutoff valve located on or near the wellhead.

NDAC Section 43-05-01-11(12) requires all packers, packer elements, or similar equipment critical to the containment of carbon dioxide must be of a quality to withstand exposure to carbon dioxide.

NDAC Section 43-05-01-11(14) requires all newly drilled wells must establish internal and external mechanical integrity as specified by the Commission and demonstrate continued mechanical integrity through periodic testing as determined by the Commission. All other wells to be used as injection wells must demonstrate mechanical integrity as specified by the

Commission prior to use for injection and be tested on an ongoing basis as determined by the Commission.

NDAC Section 43-05-01-11(17) requires all injection wells must be equipped with shutoff systems designed to alert the operator and shut-in wells when necessary.

(18) The Commission has rules and regulations in place requiring the operator to demonstrate seismicity will not interfere with containment and prohibiting fracturing of the injection zone. NDAC Section 43-05-01-05(1)(b)(2)(m) requires the applicant must provide information on the seismic history, including the presence and depth of seismic sources and a determination that the seismicity would not interfere with containment.

NDAC Section 43-05-01-11.3(1) requires, except during stimulation, the storage operator shall ensure that injection pressure does not exceed ninety percent of the fracture pressure of the injection zone so as to ensure that the injection does not initiate new fractures or propagate existing fractures in the injection zone. Injection pressure must never initiate fractures in the confining zone or cause the movement of injection or formation fluids that endanger an underground source of drinking water. All stimulation programs are subject to the Commission's approval as part of the storage facility permit application and incorporated into the permit.

(19) The Commission received a letter from CCUS Consultant Geoscientist, Daniel R. Zebrowski (Zebrowski) on October 29, 2021 stating Minnkota's permit application does not comply with NDCC Chapter 38-22 and NDAC Chapter 43-05-01 and that there is potential for leakage of the carbon dioxide from the injection formation. Zebrowski states that failure of the carbon dioxide storage facility could allow for contamination of the near surface freshwater aquifers and surface water features. Additionally, that technical data presented by Minnkota to the North Dakota Industrial Commission reveal incomplete evaluation of geologic data, engineering data, and 2D and 3D geophysical data to properly assess and characterize the confinement formation and injection formations and lower confinement formations as described in their permit application.

Zebrowski references the seismic data collected by Minnkota and states they have failed to display any geophysical maps constructed and calibrated with existing well data for subsurface formations. Zebrowski states it is imperative the Commission reviews such geophysical data, interpretations, and maps to fully understand the geological setting across the storage facility area and the proposed injection site location to ensure the cap-rock and containment formations do not have faults which breach both and would allow for carbon dioxide to escape and contaminate freshwater aquifers.

Zebrowski states Minnkota failed to display any 2D or 3D seismic data from the surface to the basement within the storage facility and area of review in support of their carbon dioxide storage permit application. Zebrowski questions why Minnkota completed required work and then did not display final products in support of the storage facility permit application, and why no 3D seismic lines which directly tie the proposed injection well were depicted to the Commission in support of the carbon dioxide storage application. Zebrowski states four 2D seismic lines were acquired and processed which directly tie the proposed injection well yet none of this data is utilized in support of the carbon dioxide storage facility permit application and depicted for the

Commission. Zebrowski states that additional 2D seismic legacy data is available within the storage facility area.

Zebrowski states Minnkota has displayed partial lines (250'-400' of data out of over 9,000' of data) from two different 3D seismic impedance volumes which only depict the Icebox Formation and the Black Island and Deadwood Formations. Zebrowski states utilizing the limited amount of impedance 3D seismic data presented in support of the carbon dioxide storage facility permit application allows for one to interpret several faults within the Icebox, Black Island, and Deadwood Formations. Zebrowski states the applicant states an evaluation has been completed from the Deadwood Formation to freshwater aquifers, and that 3D seismic data and interpretations displayed to the Commission are incomplete and lack technical merit for the Commission to make a reasonable evaluation of the carbon dioxide storage container integrity. Zebrowski states one can clearly depict near vertical faults within the Icebox, Black Island, and Deadwood Formations utilizing the applicant's 3D seismic data.

Zebrowski states the applicant directly accepts a much higher degree of risk for carbon dioxide storage facility failure of the cap-rock and injection formations by withholding critical scientific data and the Commission should not allow the State of North Dakota to accept additional risk of a carbon dioxide storage facility containment failure.

Zebrowski includes images of Figure 2-7 from Minnkota's application. Zebrowski provided edited images from Minnkota's application, captioned Figure 2-7, Figure 2-7(a), and Figure 2-7(b). On Figure 2-7 Zebrowski asks where are formation tie in points? On Figure 2-7(a) Zebrowski states Icebox, Black Island, and Deadwood 3D seismic structure and isopach maps are not presented, and that they should have been included in support of the carbon dioxide storage permit application. Zebrowski claims this data is required to effectively evaluate the storage facility area and integrity. Zebrowski states that without this data, the North Dakota Industrial Commission will be making a carbon dioxide storage facility permit decision based solely on subsurface well control data, and thus why acquire 2D and 3D seismic data? On Figure 2-7(b) Zebrowski states that data is missing above the Icebox Formation and below the Precambrian. Zebrowski states that interpretation of the limited 3D impedance lines depicts several near vertical faults within the Deadwood Formation, and such faults are typical for the Williston Basin. Zebrowski states the faults interpreted may also breach the cap-rock formation. Zebrowski asks why 3D seismic data above and the Icebox Formation below the Deadwood Formation have been removed? Zebrowski states that deliberately covering up 3D seismic data from a permit application leads to suspicion of the applicant's interpretations of the data.

Zebrowski states the applicant projects a direct well tie via synthetic seismogram on Figure 2-7 (west 3D seismic survey), and that no formation tops are displayed on the synthetic trace from the well log data for the J-LOC #1. Zebrowski asks where is the top and base of the Icebox, Black Island, and Deadwood Formations displayed on the synthetic seismogram? Zebrowski states that it could be asked from the amount of data displayed, if this is the Icebox and Deadwood Formations? Zebrowski states that the applicant has not proven the seismic data displayed is the top and base of the Icebox, Black Island and Deadwood Formations. Zebrowski states that seismic frequencies of the synthetic trace are much higher than the actual 3D seismic data displayed and are not an exact seismic tie and can lead to mis-ties of both 2D and 3D seismic data.

Zebrowski states no 3D seismic data and synthetic seismogram ties from the J-ROC1 #1 wellbore are depicted in the permit application. Zebrowski states data quality at the J-ROC1 #1 is probably poor which does not allow for a direct synthetic seismogram tie of the 3D seismic data and well log data from the J-ROC1 #1 and J-LOC #1 depict different stratigraphy at the top of the Deadwood Formation and asks if the Black Island and Deadwood Formations are displayed in Figure 2-7.

Zebrowski states the permit application indicates additional seismic surveys within the area of review to monitor the carbon dioxide plume for this potential carbon dioxide storage facility site. Zebrowski asks why budget money if there is no intention to display data, interpretation, and results.

Zebrowski references a report, "North Dakota Integrated Carbon Storage Complex Feasibility Study" and states there are no geophysical maps or 3D seismic lines in it. Zebrowski includes Figure A-5 from the report and states they are displayed to inform the Commission of how some data can be interpreted differently and what is stated may not necessarily be correct. Zebrowski states the figure is captioned "Map view of seismic amplitude time slice through the Broom Creek Formation with interpreted geobodies. High amplitude values (blue) caused by thin bed tuning indicate the blue amplitude are interdunal carbonates." Zebrowski states the caption is incorrect and does not indicate the blue amplitude are interdunal carbonates. Zebrowski states thin bed tuning relates to the ability of seismic data to resolve the top and base of a seismic event. Zebrowski states as the thickness between the top and base decrease the seismic character will not be able to resolve top and base thickness. Zebrowski states one must have an existing well (none depicted in figure) with a sonic log and porosity logs directly tied to each seismic event to justify that statement. Zebrowski states a more reasonable interpretation is the positive amplitude events (blue) depicted are a shale/siltstone within the Deadwood [sic] Formation and the amplitude scale varies within the formation which makes it appear there are three separate geologic features, when it is one formation or geologic feature. Zebrowski states the fourth blue amplitude created in Figure A-5 is not defined as an interdunal carbonate.

Zebrowski includes Figure B-10 and B-10(a) from the same report. Zebrowski references Figure B-10(a) and states a partial interpretation of the same time slice clearly depicts a fault with a NE to SW orientation adjacent to the Flemmer-1 wellbore. Zebrowski states the features within the orange boundaries appear to be additional faults and are not a channel feature as stated. Zebrowski states channel features can usually be distinguished by a contrast from the outer edges (overbank-channel area) of a channel, not from the middle as has been suggested while viewing time slice data. Zebrowski asks, "How can the middle of a channel contrast (same rock-stratigraphy)?" Zebrowski states one can see stripping effects (acquisition footprint) within this 3D seismic data set.

Zebrowski includes Figure B-11, from an uncited source, stating it depicts a combination of 3D vertical seismic line with an associated time slice. Zebrowski states the figure was included to demonstrate to the Commission one can identify both faults and channels utilizing existing 3D seismic data. Zebrowski notes the channel displayed on the time slice is recognized by the overbank-channel contrast, and that both positive and negative amplitudes are demonstrated in this example. Zebrowski states, "The faults have zero amplitudes (white) depicted, are in the middle of a fault."

Zebrowski states the Department of Energy (DOE) has utilized time slice data for past carbon dioxide projects. Zebrowski references an article published by DOE in 2013 "Time-lapse surface seismic inversion with thin bed resolution for monitoring carbon dioxide sequestration: A case study from Cranfield, Mississippi" depicting several time slices. Zebrowski includes Figure #3 from the article and states it depicts four time slices of the Tuscaloosa injection zone across the entire 3D seismic survey. Zebrowski states the first time slice is pre-injection of carbon dioxide, the second post injection of carbon dioxide. Zebrowski states one can easily recognize the difference in the seismic data from carbon dioxide as stated in the article. Zebrowski adds one can easily recognize at least one major fault within the area of review, trending in a NW to SE orientation. Zebrowski includes Figure #4(a) from the article and states it depicts a portion of the inline from the 3D seismic survey. Zebrowski states the inline extends the entire length of the 3D seismic survey and notes the fault can clearly be recognized on inline 1102. Zebrowski includes Figure #5 as a comparison of the amount of 3D seismic data the applicant has given the Commission to evaluate this carbon dioxide storage facility permit. Zebrowski states only the Tuscaloosa (injection zone) Formation is depicted in Figure #5.

Zebrowski states one can assume the 3D seismic data quality around the injection well is probably poor as there is a lake adjacent to the proposed carbon dioxide injection well and within the storage facility area. Zebrowski states without proper undershooting (acquisition) of the lake a large data gap at the surface will be observed on the 3D seismic data volume. Zebrowski includes Figure #8 and states it depicts similar large surface data gaps on the seismic line displayed.

Zebrowski includes Figure #6 and states it depicts one of the 3D impedance lines (Figure 2-7 (B-B')) taken from the applicant's storage facility permit application with a similar scale for appearance and comparison to Figure #5. Zebrowski states it is impossible for the Commission to evaluate the cap-rock and injection formation integrity of the storage facility area from this limited amount of data. Zebrowski states the applicant depicts less than 3.1% of the actual data of one strike line from the 3D seismic survey, and that 96.9% of the seismic line depicted in Figure 2-7 is missing.

Zebrowski references Figure #8 and includes Figure #8a, and states it depicts a Gulf Oil Company seismic line over Little Knife Field located in the Williston Basin which has been published several times. Zebrowski references Figure #8 and states it depicts the entire 2D seismic line. Zebrowski references Figure #8a and states it demonstrates the same amount of seismic data Minnkota depicts in the storage facility permit application. Zebrowski states the applicant has denied the Commission the opportunity to review and evaluate 2D and 3D seismic data acquired and processed specifically for this carbon dioxide storage facility permit application.

Zebrowski states the applicant should display several strike lines, dip lines and arbitrary lines from the 3D seismic volumes which display normal migrated (black and white wiggle trace filled) seismic data from surface to well below the Precambrian in support of this carbon dioxide storage facility permit application. Zebrowski states several lines should directly tie the proposed injection and monitor wells, and that the applicant could also display several time slices of the 3D volume from 1.00 seconds to 1.40 seconds "(20 msec intervals)" wherein the Commission can have confidence the cap rock and injection formations are free of any faults

which might breach the formations and allow carbon dioxide to escape and contaminate freshwater aquifers.

Zebrowski states all 2D seismic data could also be displayed from surface to below the Precambrian with the carbon dioxide storage facility permit application. Zebrowski believes by including critical geophysical data requested above the Commission and public would have a higher degree of confidence of carbon dioxide containment in the proposed carbon dioxide storage facility area.

Zebrowski states the applicant has utilized DOE funds to characterize the proposed Tundra (CarbonSAFE III) carbon dioxide storage facility. Zebrowski states all data (including all geologic well data, 2D and 3D geophysical data, reports, simulations, etc.) are public record and can be obtained by any United States citizen. Zebrowski states the eastern 3D seismic survey and all 2D seismic lines are not proprietary (funded by DOE), and that the western 3D seismic survey appears to be licensed, but can be released to North Dakota government officials per the 3D seismic license agreement. Zebrowski states, "The applicant has yet to deposit any G&G data (well log, maps, seismic data, reports, simulations, etc.) from this research project to the EDX (Energy Data Exchange) repository operated by DOE/NETL for peer review and exchange of ideas."

Zebrowski supplies Figure #9 and states the applicant has failed to address the linear geologic surface feature which is within the 3D seismic survey outline, proposed carbon dioxide storage facility area and the area of review, approximately 1.2 miles from the proposed carbon dioxide injection well. Zebrowski states linear geologic surface features are usually associated with subsurface faults. Zebrowski states several linear geologic surface features are depicted on the North Dakota State Government website (nd.gov/gis/apps/HubExplorerV2/) within the area of review. Zebrowski states the applicant has stated no faults are present within the storage facility area and area of review. Zebrowski states a linear geologic surface feature could have a large subsurface fault(s) which potentially fault freshwater aquifers and extend several thousand feet below the surface.

Zebrowski supplies Figure #10 and states it depicts existing 2D seismic data over the proposed storage facility area which has not been depicted in this carbon dioxide storage facility permit application. Zebrowski states several long regional 2D seismic lines were probably licensed for the evaluation of this storage facility permit at the inception of this carbon dioxide sequestration project. Zebrowski states Figure #9 [sic] also depicts the approximate location of the storage facility area and 3D seismic survey locations along with the location of the linear geologic surface feature. Zebrowski states the existing 2D seismic data would be extremely important to assist the Commission in determining the vertical and horizontal extent of the Deadwood storage facility area. Zebrowski states the applicant could also depict the full migrated 2D seismic lines previously licensed to the Commission for review.

Zebrowski states the applicant may have licensed an existing regional 2D seismic line (81087-3983) which is an east-west line located approximately 2,200' south of the J-ROC1 #1 wellbore and within the storage facility area and the area of review. Zebrowski states this line extends over five miles east and five miles west of the proposed carbon dioxide injection well. Zebrowski states the applicant has not mentioned or displayed this line in the carbon dioxide storage facility permit application. Zebrowski states this line is required to assist in

characterization of the carbon dioxide storage facility area and the area of review in an east-west direction. Zebrowski states additional existing 2D seismic data may have also been licensed by the applicant within the storage facility area and area of review and are not depicted for this carbon dioxide storage facility permit application. Zebrowski states that if available from applicant, this data could be useful to fully evaluate the storage facility area and area of review for potential regional and localized faults.

Zebrowski includes Figure 2-14(a) and states it is the same lithofacies distribution model from the applicant's permit with an interpretation of several faults within the carbon dioxide storage facility area. Zebrowski states the interpreted faults appear to be associated with 2D and 3D seismic interpretations not depicted in the permit application. Zebrowski states the faults could easily extend much higher in the section as Precambrian is below the Deadwood and Icebox Formations, and that such faults could be associated linear basement features.

Zebrowski states pursuant to NDCC Chapter 38-22 (Carbon Dioxide Underground Storage) and NDAC Chapter 43-05-01 (Geologic Storage of Carbon Dioxide) the applicant has not presented all technical work required for the North Dakota Industrial Commission to make a comprehensive decision on the storage facility area and integrity from the carbon dioxide storage facility permit application. Zebrowski states applicant has withheld vital geologic and geophysical data, incorrectly displayed geologic and geophysical data, or did not acquire geological and geophysical data required in the permit application which could reduce the risk of a carbon dioxide storage facility failure.

Zebrowski claims the applicant has failed to comply with NDCC Section 38-22-08(1):

- 1.) Applicant has failed to provide and depict all characterization interpretations and correct detailed seismic data and interpretations, geologic/geophysical maps, and cross sections for a comprehensive evaluation of the carbon dioxide storage facility permit application as required by the State of North Dakota and the Commission.
- 2.) Applicant has failed to acquire MDT, FMI, or QuantaGeo logs at the proposed injection wellbore (J-ROC1 #1) location or within the carbon dioxide storage facility area as required by the State of North Dakota.
- 3.) Applicant has failed to address a linear geologic surface feature within the proposed storage facility area which usually indicate the presence of subsurface faults as required by the State of North Dakota.

Zebrowski claims the applicant has failed to comply with NDCC Section 38-22-08(2):

- 1.) Applicant has not demonstrated the storage facility is suitable and feasible for carbon dioxide injection and storage by withholding critical geological/geophysical maps and both 2D and 3D seismic data (strike lines, dip lines, arbitrary lines, time slices, etc.) for interpretation and inspection by the State of North Dakota and the Commission. Strike lines, dip lines, arbitrary lines, and time slices of 3D seismic volumes can easily verify the presence of faults (storage containment failure) within the storage facility area. Figure #2-7(b) depicts several interpreted faults within the Icebox Formation and Black Island and Deadwood Formations from the existing 3D seismic data set.

2.) Applicant has failed to run MDT logs over the confinement formation and injection b or any other formation at the proposed injection well location (J-ROC1 #1) or within the storage facility area. Applicant does not have any microfracture in situ stress tests from the J-ROC1 #1 wellbore and cannot determine formation pressures, high quality fluid samples, and permeability anisotropy within the storage facility area as required by the State of North Dakota and the Commission. Applicant projects incomplete MDT data from a wellbore located over 4.5 miles (outside the proposed storage facility area) from the proposed carbon dioxide injection wellbore (J-ROC1 #1) wherein geologic conditions (depth, stratigraphy, structure, dip rates, pressure, etc.) have changed above the cap rock formations, within the cap rock formations, within the injection formation, and below the injection formation. Applicant has failed to demonstrate the storage facility is suitable and feasible for carbon dioxide injection and storage. Applicant failed to run an FMI or QuantaGeo log in the proposed injection wellbore (J-ROC1 #1) which can demonstrate faults and fractures above the cap rock formations, within the cap rock formations, within the injection formation and below the injection formations.

3.) Applicant has failed to demonstrate the storage facility is suitable and feasible for carbon dioxide injection and storage.

Zebrowski claims the applicant has failed to comply with NDCC Section 38-22-08(8):

1.) Applicant has withheld detailed structure and isopach maps of the confining and injection formations constructed from existing 2D and 3D seismic data from the carbon dioxide storage facility permit application. This data can be directly calibrated to geological well data from the proposed injection well. Applicant has withheld 2D and 3D seismic data (lines, time slices, etc.) from the Commission and public. Applicant states no faults are present in the area of review area but do not provide any evidence to the Commission to support such statement. Figure 2-7(b) clearly depicts several interpreted faults within the storage facility area and contrast with the applicant's statement. Applicant could easily provide such evidence to support their statement by making several inlines, cross lines, and arbitrary lines from the migrated 3D seismic volume (surface to below Precambrian) to the Commission. Applicant could also display time-slices from above the cap-rock formation through the injection formations at "20 msec." intervals utilizing the entire 3D seismic volumes. This data is required to confirm that carbon dioxide will not escape from the storage reservoir within the storage facility area. Applicant has failed to confirm from all geologic, geophysical, and engineering data that carbon dioxide will not escape from the storage reservoir.

2.) Zebrowski reiterates that the applicant has failed to run MDT logs and an FMI or QuantaGeo log in the proposed injection wellbore (J-ROC1 #1).

Zebrowski claims the applicant has failed to comply with NDCC Section 38-22-06(10):

1.) Applicant's permit clearly has a higher degree of containment failure risk which will clearly endanger human health and endanger the environment (permanent contamination of freshwater aquifers and surface water ponds, lakes, and streams). Faults are present within confinement and injection zones.

2.) Applicant has not addressed linear geologic surface features (which are usually associated with faults) within the carbon dioxide storage facility area and the area of review. Surface/near-surface fault(s) could extend downward through freshwater aquifers into deeper formations. Carbon dioxide could escape confinement and travel through a series of faults to freshwater aquifers and surface water (lakes, streams, etc.) If carbon dioxide escapes and makes its way to the surface it will collect in surface sink areas and could potentially kill all human and wildlife within surface sink areas.

Zebrowski claims the applicant has failed to comply with NDCC Section 38-22-08(11):

1.) At the present, the applicant's carbon dioxide storage permit application is not in the public interest as the risk of carbon dioxide storage facility containment failure clearly outweighs the removal of carbon dioxide from the atmosphere. Applicant has failed to provide and depict all characterization data, interpretations, and maps for a comprehensive evaluation by the State of North Dakota and the Commission of the carbon dioxide storage facility area and area of review.

Zebrowski claims the applicant has failed to comply with NDCC Section 38-22-08(12):

1.) Applicant has not demonstrated the storage reservoir has been defined. The vertical boundaries have not been determined directly over the proposed injection wellsite, storage facility area, and a substantial portion of the area of review (storage reservoir). Applicant has withheld critical geological/geophysical maps and both 2D and 3D seismic data for interpretation and inspection by the State of North Dakota and the Commission. Applicant has not provided accurate detailed structure maps and isopach maps of the cap rock formations and injection formation which define the vertical and horizontal extent of the potential carbon dioxide reservoir. Applicant has not depicted any seismic data (2D or 3D) which depicts both the cap rock formation and the injection formation in this application. Applicant has only depicted maps constructed from existing well control for the horizontal and vertical boundaries of the storage reservoir. Applicant has not addressed interpreted faults depicted in Figure 2-7(b). Applicant has not defined the horizontal and vertical boundaries of the storage reservoir utilizing all existing and required scientific data. Zebrowski reiterates that the applicant has failed to run MDT logs on the proposed injection wellbore (JROC-1) and without formation pressure data the applicant cannot define the horizontal and vertical boundaries of the storage reservoir as required by the State of North Dakota.

Zebrowski claims, "The applicant has failed to comply with NDAC Section 43-05-01(C-4) Geologic Exhibits i."

1.) Applicant has failed to depict accurate well log cross sections which depict the structural configuration of the storage reservoir. Zebrowski references Figure 2-12b and states it depicts two cartoon structure cross sections which are not accurate. The cross sections are not displayed relative to sea level and do not indicate true formation dips of the geologic conditions at the storage reservoir in a cross-section view. Regional well log structure maps (Figure 2-13) are depicted in subsea depths while both cross sections depicted in Figure 2-12b are in measured depth or true vertical depth, not subsea depth. Accurate structural cross sections could assist in identification of existing faults within the carbon dioxide

storage facility area and area of review. Zebrowski states the applicant has failed to comply with accurate structural cross sections as required by the State of North Dakota.

Zebrowski claims, "The applicant has failed to comply with NDAC Section 43-05-01(C-4) Geologic Exhibits j."

1.) Zebrowski references Figure 2-7(b) and states it depicts several interpreted faults within the injection zone that appear to transect the confining zone. Zebrowski states additional 2D and 3D seismic data must be displayed to confirm the extent and orientation of faults within the carbon dioxide storage facility area and area of review. Zebrowski reiterates the applicant has failed to address a linear geologic surface feature approximately 1.2 miles from the proposed injection well. Zebrowski states this linear geologic surface feature is probably related to a large subsurface fault within the storage facility area and area of review. Zebrowski states the near surface freshwater aquifers could be faulted and that the faults could also extend several thousand feet below surface. Zebrowski reiterates the applicant has failed to run MDT logs at the proposed injection well location (J-ROC1 #1) or within the storage facility area. Zebrowski states the applicant projects incomplete MDT data from a wellbore located over 4.5 miles from the proposed carbon dioxide injection wellbore (J-ROC1 #1). Zebrowski reiterates the applicant has failed to run an FMI or QuantaGeo log in the proposed injection wellbore (J-ROC1 #1) which can demonstrate faults and fractures within the cap rock formations, injection formation, below the injection formation, and within the storage facility area. Zebrowski states the applicant has no log data within the storage facility area to determine if fractures or faults exist. Zebrowski states the applicant cannot definitively state no fractures or faults are present in the storage facility area without this data.

Zebrowski claims, "The applicant has failed to comply with NDAC Section 43-05-01(C-4) Geologic Exhibits k." Zebrowski reiterates the applicant has not provided seismic data, addressed faults depicted in Figure 2-7(b), and addressed linear geologic surface features. Zebrowski reiterates the applicant has failed to run MDT logs over formations at the J-ROC1 #1.

Zebrowski states, "The applicant has failed to comply with NDAC Section 43-05-01(C-4) Geologic Exhibits L." Zebrowski reiterates the applicant has not run MDT logs and an FMI or QuantaGeo log in the J-ROC1 #1.

Zebrowski states he does not object to carbon dioxide sequestration and that his goal is to assist in evaluations from a public perspective and help reduce risk of potential carbon dioxide containment failures. Zebrowski states the applicant could easily remedy most of the deficiencies with additional time and completed work products suggested and required by the State of North Dakota. Zebrowski states the applicant could not receive a Class VI (UIC) injection well permit from the EPA with incomplete data (No MDT, FMI or QuantaGeo log) as demonstrated in this carbon dioxide storage facility permit application.

Zebrowski, considering the evidence depicted within his letter, urges (on behalf of several surface owners within the carbon dioxide storage facility area) the North Dakota Industrial Commission to reject Minnkota Power Cooperative, Inc's storage facility permit (Case No. 29032) until such time the applicant fulfills all requirements set forth by the State of North Dakota in NDCC Chapter 38-22 and NDAC Chapter 43-05-01. Zebrowski states the applicant

has burdened the State of North Dakota with additional containment failure risks with an incomplete application that does not comply with North Dakota State Law. Zebrowski states it would be extremely unfortunate if carbon dioxide injection begins and immediately escapes the Black Island and Deadwood Formations.

(20) Minnkota testified it believes it is in complete compliance with the statutes and regulations, and that comments made by Zebrowski stating the application does not comply with NDCC Chapter 38-22 and NDAC Chapter 43-05-01, are an opinion.

Minnkota testified that the seismic interpretation was completed from the Precambrian basement up through the Pierre Formation and that this interpretation included structural surfaces, including the reservoirs of interest and confining layers. Minnkota testified this was included in the model which was provided to the Commission as part of the application. Minnkota testified in the Deadwood permit application, time structure maps were included that were constructed and calibrated using existing well data, particularly Figure 2-55 and Figure 2-59.

Minnkota testified having seismic data and displaying seismic data is not a requirement of the regulations, and that no data was withheld. Minnkota testified in the Deadwood application that Figure 2-57 shows a 3D seismic line tied to the J-ROC1 #1 well. Minnkota testified that 2D seismic lines were collected as part of the project and permit application and did not display them within the application since the four 2D lines are within the 3D seismic survey outline. Minnkota testified 2D information was not included in the model, only the 3D data was. Minnkota testified that 2D legacy seismic data was typically collected with lesser parameters than modern standards and that it purchased 28 miles of 2D legacy seismic data in this area. Minnkota testified such legacy data was purchased as part of the CarbonSAFE phase 2 feasibility study, conducted by the Energy and Environmental Research Center (EERC) in 2016. The datasets were deemed to have insufficient data quality in review, leading to performing additional 2D and 3D data acquisitions.

Minnkota testified impedance volumes displayed are using smooth seismic horizons as a framework, but that the initial model uses square grid blocks which are not able to capture the smoothness of the structure. Minnkota testified the square grid blocks arranged in a vertical orientation leave remaining artifacts in the final inversion results which present themselves as vertical features, but that those features are only artifacts. Minnkota testified that acoustic impedance volumes are not useful in interpreting structure and attempting to draw conclusions or interpreting a fault from this dataset is not a sound method for geophysical interpretation.

Minnkota testified that the data necessary has been provided to address various rules related to presence of any leakage pathways, lateral continuity of the formation, upper confining zones, thickness, structure, and structural features that have the potential to serve as fluid communication pathways, and structural or stratigraphic pinch outs in the region with figures in the application. Minnkota testified it can supply additional data if the Commission finds additional information relevant. Minnkota testified the inversion was focused on the reservoir which was displayed to show data used for the geologic model and that there was not a good inversion match above and below the reservoir.

Minnkota testified that well logs from the J-LOC #1 and J-ROC1 #1 were used to calibrate well log data to seismic data for both 3D seismic data sets, and BNI #1 log data was used for the western seismic data set. Minnkota testified data quality from the J-ROC1 #1 well was sufficient to tie the well to the seismic data and used the east-west 2D seismic line acquired to tie the western 3D seismic data set to the eastern data set. Minnkota testified this confirmed the well tie for the western 3D survey to the J-LOC #1 well and is in agreement with the independent well tie of the eastern 3D survey to the J-ROC1 #1 well.

Minnkota testified data sets referenced in paragraph 5 of page 4 and pages 5-7 of Zebrowski's comments were not used in this application as they were not connected to this application or the location under consideration. Minnkota testified the data sets referenced in Zebrowski's comments are related to a different location in Mercer County and some data is from a different state. Minnkota testified several figures are from different formations, depositional environments, and structural regimes and are not relevant to the application.

Minnkota testified surface infrastructure and obstacles such as Nelson Lake were considered in the design of the 3D survey and appropriately addressed through source and receiver line placement, and that the 3D seismic data was sufficient for interpreting and tying well log data to the seismic data for interpretation of the formations of interest.

Minnkota testified the linear geologic surface features are glacial features and not relevant to the deep subsurface geology. Minnkota testified freshwater sample data indicating faulting is unsubstantiated and that no supporting information was provided by Zebrowski. Minnkota testified that it and EERC reviewed available baseline freshwater sample data in the region and collected samples.

Minnkota testified vertical features in Figure 2-14 from their application are modeling artifacts at the edges of the seismic horizons put into the model as well as gentle structure from the seismic data, and that the artifacts and structure were amplified in appearance by vertical exaggeration.

Minnkota testified the implied failure to comply with statutory and regulatory requirements are an opinion by Zebrowski, and that he does not have the authority to make those conclusions. Minnkota testified an FMI log was run in the J-ROC1 #1 well, and that MDT was unable to be acquired. Minnkota testified an MDT log is not a requirement for the storage facility permit application, but is required prior to injection and will be performed and submitted.

(21) Pursuant to NDAC Section 43-05-01-05 (1)(b)(2)(j) the application is required to provide the location, orientation, and properties of known or suspected faults and fractures that may transect the confining zone in the area of review, and a determination that they would not interfere with containment.

Pursuant to NDAC Section 43-05-01-05 (1)(b)(2)(k) the application must include data on the depth, areal extent, thickness, mineralogy, porosity, permeability, and capillary pressure of the injection and confining zone, including facies changes based on field data, which may include geologic cores, outcrop data, seismic surveys, well logs, and names and lithologic descriptions.

Pursuant to NDAC Section 43-05-01-05 (1)(b)(2)(l) the application is required to provide geomechanical information on fractures, stress, ductility, rock strength, and in situ fluid pressures within the confining zone. The confining zone must be free of transmissive faults or fractures and of sufficient areal extent and integrity to contain the injected carbon dioxide stream.

Pursuant to NDAC Section 43-05-01-05 (1)(b)(2)(o) the application is required to identify and characterize additional strata overlying the storage reservoir that will prevent vertical fluid movement, are free of transmissive faults or fractures, allow for pressure dissipation, and provide additional opportunities for monitoring, mitigation, and remediation. There are no requirements to include the 2D or 3D seismic lines in the application.

(22) The Commission believes Minnkota's testimony sufficiently addresses the appearance of vertical features in acoustic impedance volumes and in the geologic model cross section.

(23) The Commission notes "Linear Geologic Surface Features" on nd.gov/gis/apps/HubExplorerV2 are river channels and a glacial ice margin.

(24) Minnkota's application provides adequate data to show suitability of the Black Island and Deadwood Formations for geologic storage of carbon dioxide in the facility area.

(25) Minnkota's application provides adequate modeling of the storage reservoir for delineation of the facility area, and adequate monitoring to detect if carbon dioxide is migrating into properties outside of the facility area pursuant to NDAC Section 43-05-01-11.4. Vertical release of carbon dioxide is addressed by the application pursuant to NDAC Section 43-05-01-13, and lateral release of carbon dioxide from the facility area is addressed by the application pursuant to NDAC Section 43-05-01-05.

(26) The amalgamated storage reservoir pore space to be utilized is not hydrocarbon bearing as determined from test data included with the application. There has been no historic hydrocarbon exploration or production from formations below the Black Island and Deadwood Formations within the proposed facility area. Lignite coal is mined from the Sentinel Butte Formation above the proposed facility area. Coal seams exist in the Bullion Creek Formation. All coal seams present in the Fort Union Group above the facility area will not be impacted by this project as there are no current or future planned mining activities at the location of the wells. The lateral extent of the stabilized plume is large enough to prevent drilling for hydrocarbon exploration in interior sections within the facility area, under the Black Island and Deadwood Formations, without penetrating the stored carbon dioxide. While Minnkota does not foresee an operator drilling through the carbon dioxide plume, they acknowledge controls would need to be in place to consider it for any potential future exploration that would penetrate the storage reservoir.

(27) Minnkota's Milton R. Young Station is a two-unit mine-mouth lignite coal-fired power plant located in Oliver County, North Dakota, near the city of Center. The lignite used as fuel for electrical generation is the source of the carbon dioxide.

(28) Up to 4,000,000 metric tons of carbon dioxide will be captured annually from the Milton R. Young Station. The captured carbon dioxide will be dehydrated, compressed, transported to a Class VI well by a flow line, and then injected. Up to 1,170,000 metric tons of carbon dioxide will be injected into the Black Island and Deadwood Formations annually.

(29) The entire length of flow line to be utilized for carbon dioxide transportation from the capture facility to the wellhead falls within the facility area delineation and is under the jurisdiction of the Commission.

(30) Minnkota submitted supplemental information regarding the flow line. The information contained in the supplement is from a FEED study performed by Burns & McDonnell and materials and contractors have not been selected. When a final construction plan is issued, Minnkota will submit notice of intent a minimum of seven days prior to commencing construction on a form containing all required and requested information in accordance with NDAC Section 43-02-03-29.1. Maximum operating pressure is expected to be 1,690 psi.

(31) The flow line will be equipped with a DAS/DSS/DTS fiber optic cable to detect leaks.

(32) The projected composition of the carbon dioxide stream is greater than 99.9% carbon dioxide with trace quantities of water, nitrogen, argon, oxygen, sulfur dioxide, nitrogen dioxide, and nitric dioxide.

(33) The proposed McCall #1 well will be tested, logged, and constructed to Class VI requirements, to be located 1,978 feet from the north line and 257 feet from the west line of Section 4, Township 141 North, Range 83 West, Oliver County, North Dakota.

(35) The proposed NRDT #1 well is to be located 2,148 feet from the south line and 691 feet from the east line of Section 34, Township 142 North, Range 83 West, Oliver County, North Dakota. This well is to be utilized as a direct method of monitoring the injection zone pursuant to NDAC Section 43-05-01-11.4.

(36) Minnkota created a geologic model based on site characterization as required by NDAC Section 43-05-01-05.1 to delineate the area of review. Data utilized included well log, seismic, and core data. Well log data was used to pick formation tops, interpret lithology, estimate petrophysical properties, and determine a time-depth shift for seismic data in the Deadwood B Member, the lower confining zone, the Icebox Formation, the upper confining zone, and the Black Island and Deadwood Formations, the injection formations. Geostatistics were used to distribute petrophysical properties throughout the confining zones. Seismic data was used to reinforce interpolation of the formation tops to create structural surfaces, and to distribute lithologies and geologic properties in the model. Based on the reservoir pressure obtained from the J-LOC #1 (Well No. 37380), critical threshold pressure for this storage facility will be reached in the Black Island and Deadwood Formations during injection. Critical threshold pressure has the same meaning as pressure front, defined in NDAC Section 43-05-01-01, for area of review delineation purposes. The predicted extent of the pressure front from beginning to end of life of the project, at the time that injection ceases, was used to define the area of review in this case.

(37) The area proposed to be included within the storage facility is as follows:

TOWNSHIP 142 NORTH, RANGE 84 WEST

THE S/2 SE/4 OF SECTION 35, AND THE S/2 OF SECTION 36,

TOWNSHIP 142 NORTH, RANGE 83 WEST

ALL OF SECTIONS 28, 29, 31, 32, 33 AND 34, THE SE/4 SE/4 OF SECTION 19, THE SE/4 AND S/2 SW/4 OF SECTION 20, THE S/2 AND S/2 N/2 OF SECTION 21, THE SW/4 NW/4, W/2 SW/4, AND SE/4 SW/4 OF SECTION 22, THE SW/4 AND SW/4 SE/4 OF SECTION 26, THE W/2, SE/4, AND W/2 NE/4 OF SECTION 27, THE E/2, E/2 SW/4, AND SE/4 NW/4 OF SECTION 30, AND THE W/2, NE/4, AND W/2 SE/4 OF SECTION 35,

TOWNSHIP 141 NORTH, RANGE 84 WEST

ALL OF SECTIONS 1 AND 12, THE E/2, E/2 SW/4, AND E/2 E/2 NW/4 OF SECTION 2, AND THE NE/4, E/2 NW/4, AND NE/4 SE/4 OF SECTION 13,

TOWNSHIP 141 NORTH, RANGE 83 WEST

ALL OF SECTIONS 2, 3, 4, 5, 6, 7, 8, 9, 10, 16, 17 AND 18, THE W/2 SW/4 OF SECTION 1, THE W/2, NE/4, W/2 SE/4, AND NE/4 SE/4 OF SECTION 11, THE W/2 NW/4, NE/4 NW/4, AND NW/4 SW/4 OF SECTION 12, THE N/2 NW/4, SE/4 NW/4, NW/4 NE/4, W/2 SW/4 NW/4, AND NE/4 SW/4 NW/4 OF SECTION 14, THE N/2 N/2, SE/4 NE/4, AND SW/4 NW/4 OF SECTION 15, THE N/2 N/2, SE/4 NW/4, AND SE/4 NE/4 OF SECTION 19, THE N/2 OF SECTION 20, AND THE W/2, W/2 NE/4, AND NW/4 SE/4 OF SECTION 21.

(38) The Black Island and Deadwood Formations, the upper confining Icebox Formation, and the lower confining Deadwood B Member are laterally extensive through the area of review.

(39) The Black Island Formation directly overlies the Deadwood Formation. Core analysis of the Black Island and Deadwood Formations shows sufficient permeability to be suitable for the desired injection rates and pressures without risk of creating fractures in the injection zone. Thin-section investigation shows the Deadwood Formation is comprised of fine to medium grained sandstone and several interbeds of dolostone and limestone. Thin-section analysis of the sandstone intervals shows quartz is dominant, with minor occurrences of feldspar, dolomite, and calcite as cements. Distinct carbonate intervals were noted. The first is a fine to medium grained dolostone with quartz and calcite present. The second consists of fine-grained limestone with dolomite and quartz present. Microfracture testing in the J-LOC #1 (Well No. 37380) well, near, but outside of the delineated facility area, at a depth of 9,885 feet determined the breakdown pressure of the formation to be 8,231 psi, with a fracture propagation pressure of 7,450 psi, and a fracture closure pressure of 7,393 psi. Microfracture in situ tests were attempted in the J-ROC1 #1 (File No. 37672) well, but because of unstable wellbore conditions, the MDT stress tool run was not performed after a near-loss of the tool in the wellbore. Microfracture testing is proposed for the Deadwood Formation within the facility area, to be submitted to the Commission for review prior to injection of carbon dioxide.

Core analysis of the overlying Icebox Formation shows sufficiently low permeability to stratigraphically trap carbon dioxide and displaced fluids. Thin-section investigation shows the

Icebox Formation is comprised primarily of shale. Microfracture testing in the J-LOC #1 (Well No. 37380) well, near, but outside of the delineated facility area, at depths of 9,749 and 9,751 feet observed no formation breakdown with a maximum of 10,985 psi and 10,867 psi applied, respectively. Microfracture tests were attempted in the J-ROC1 #1 (File No. 37672) well, but because of unstable wellbore conditions, the MDT stress tool run was not performed after a near-loss of the tool in the wellbore. Microfracture testing is proposed for the Icebox Formation within the facility area, to be submitted to the Commission for review prior to injection of carbon dioxide.

Core analysis of the underlying Deadwood B Member shows sufficiently low permeability to stratigraphically contain carbon dioxide and displaced fluids. Thin-section investigation shows the Deadwood B Member is comprised of carbonates and shale facies. The carbonates were comprised of calcite minerals, fossils, feldspar, and quartz.

(40) The in situ fluid of the Black Island and Deadwood Formations in this area is in excess of 10,000 parts per million of total dissolved solids.

(41) Investigation of wells within the area of review found no vertical penetrations of the confining or injection zones requiring corrective action. The area of review will be reevaluated at a period not to exceed five years from beginning of injection operations.

(42) The Fox Hills Formation is the deepest underground source of drinking water (USDW) within the area of review. Its base is situated at a depth of 1,225 feet at the location of the proposed injection well, leaving approximately 8,053 feet between the base of the Fox Hills Formation and the top of the Black Island Formation.

(43) Fluid sampling of shallow USDWs has been performed to establish a geochemical baseline, with additional baseline sampling proposed for the Fox Hills Formation and other shallow wells under investigation. Future sampling is proposed in Minnkota's application pursuant to NDAC Section 43-05-01-11.4.

(44) Soil sampling is proposed pursuant to NDAC Section 43-05-01-11.4. A baseline of soil gas concentrations will be established and submitted to the Commission for review prior to injection operations. Soil gas profile stations will be located off of the well pads near the J-ROC1 #1 (Well No. 37672), near the Herbert Dresser #1-34 (Well No. 4937), and near the proposed NRDT-1 monitoring well.

(45) The top of the Red River Formation is at 8,455 feet, approximately 7,230 feet below the base of the Fox Hills Formation and it provides an additional zone of monitoring between the Fox Hills Formation and the Black Island and Deadwood Formations to detect vertical carbon dioxide or fluid movement.

(46) Fluid samples from the Inyan Kara Formation and Broom Creek Formation suggest that they are hydraulically isolated from each other, supporting that the confining formations above the Broom Creek Formation are not compromised by migration pathways. The Broom Creek and Inyan Kara Formations provide additional zones of monitoring between the Fox Hills Formation and the Black Island and Deadwood Formations to detect vertical carbon dioxide or fluid movement.

(47) No known or suspected regional faults or fractures with transmissibility have been identified during the site-specific characterization. Features within the Icebox Formation are primarily related to compaction, with no presence of natural fractures. Closed-tension fractures were observed in the Deadwood B Member and commonly coincident with compaction features. Compaction features are parallel to bedding and commonly filled with clay minerals, reducing porosity. One high angle thrust fault in the Precambrian was identified within the area of review that vertically terminates well below the injection and confining zones. The Deadwood A Member sands overly the Precambrian, and will not be injected into, preventing pressure exposure that could create failure on the fault.

(48) Geochemical simulation performed with the injection stream and data obtained from the injection zone determined approximately an 8% increase in cumulative injection potential. Conservatively high carbon dioxide exposure simulations to the cap rock determined that geochemical changes will be minor and will not cause substantive deterioration compromising confinement.

(49) Risk of induced seismicity is not a concern based on existing studies of major faults within the area of review, tectonic boundaries, and relatively stable geologic conditions surrounding the proposed injection site.

(50) Both the injection and monitoring wells are equipped with DTS fiber optic cables enabling continuously monitored external mechanical integrity. The proposed McCall #1 injector will have an annual temperature log run on the casing string that is not equipped with DTS fiber optic cable to meet the external mechanical integrity requirements of NDAC Section 43-05-01-11.1.

(51) The approval of this application is in the public interest by promoting the policy stated in NDCC Section 38-22-01.

IT IS THEREFORE ORDERED:

(1) The creation of the Minnkota Center MRYS Deadwood Storage Facility #1 in Oliver County, North Dakota, is hereby authorized and approved.

(2) Minnkota Power Cooperative, Inc., its assigns and successors, is hereby authorized to store carbon dioxide in the Black Island and Deadwood Formations in the Minnkota Center MRYS Deadwood Storage Facility #1.

(3) The Minnkota Center MRYS Deadwood Storage Facility #1 shall extend to and include the following lands in Oliver County, North Dakota:

TOWNSHIP 142 NORTH, RANGE 84 WEST
THE S/2 SE/4 OF SECTION 35, AND THE S/2 OF SECTION 36,

TOWNSHIP 142 NORTH, RANGE 83 WEST

ALL OF SECTIONS 28, 29, 31, 32, 33 AND 34, THE SE/4 SE/4 OF SECTION 19, THE SE/4 AND S/2 SW/4 OF SECTION 20, THE S/2 AND S/2 N/2 OF SECTION 21, THE SW/4 NW/4, W/2 SW/4, AND SE/4 SW/4 OF SECTION 22, THE SW/4 AND SW/4 SE/4 OF SECTION 26, THE W/2, SE/4, AND W/2 NE/4 OF SECTION 27, THE E/2, E/2 SW/4, AND SE/4 NW/4 OF SECTION 30, AND THE W/2, NE/4, AND W/2 SE/4 OF SECTION 35,

TOWNSHIP 141 NORTH, RANGE 84 WEST

ALL OF SECTIONS 1 AND 12, THE E/2, E/2 SW/4, AND E/2 E/2 NW/4 OF SECTION 2, AND THE NE/4, E/2 NW/4, AND NE/4 SE/4 OF SECTION 13,

TOWNSHIP 141 NORTH, RANGE 83 WEST

ALL OF SECTIONS 2, 3, 4, 5, 6, 7, 8, 9, 10, 16, 17 AND 18, THE W/2 SW/4 OF SECTION 1, THE W/2, NE/4, W/2 SE/4, AND NE/4 SE/4 OF SECTION 11, THE W/2 NW/4, NE/4 NW/4, AND NW/4 SW/4 OF SECTION 12, THE N/2 NW/4, SE/4 NW/4, NW/4 NE/4, W/2 SW/4 NW/4, AND NE/4 SW/4 NW/4 OF SECTION 14, THE N/2 N/2, SE/4 NE/4, AND SW/4 NW/4 OF SECTION 15, THE N/2 N/2, SE/4 NW/4, AND SE/4 NE/4 OF SECTION 19, THE N/2 OF SECTION 20, AND THE W/2, W/2 NE/4, AND NW/4 SE/4 OF SECTION 21.

(4) Injection into the Minnkota Center MRYS Deadwood Storage Facility #1 shall not occur until Minnkota Power Cooperative, Inc. has met the financial responsibility demonstration pursuant to Order No. 31588, Case No. 29034.

(5) This authorization does not convey authority to inject carbon dioxide into the Minnkota Center MRYS Deadwood Storage Facility #1; an approved permit to inject for the proposed McCall #1 shall be issued by the Commission prior to injection operations commencing.

(6) The authorization granted herein is conditioned on the operator receiving and complying with all provisions of the injection permit issued by the Oil and Gas Division of the Industrial Commission, and complying with all provisions of NDAC Chapter 43-05-01 where applicable, and this order.

(7) Definitions.

“Area of review” in this case means the delineated extent of the reservoir where injection activities through the life of the project will create sufficient pressure increase to drive formation fluids into a USDW through a potential conduit.

“Cell” in this case means individual cell blocks of the geologic model; each cell is approximately 500 feet by 500 feet.

“Facility area” means the areal extent of the storage reservoir as defined in paragraph (3) above, that includes lands within the lateral boundary of the carbon dioxide plume from beginning of injection to the time the carbon dioxide plume ceases to migrate into adjacent geologic model cells.

“Storage facility” means the reservoir, underground equipment, and surface facilities and equipment used or proposed to be used in the geologic storage operation. It does not include pipelines used to transport carbon dioxide to the storage facility under NDCC Section 38-22-02.

(8) The storage facility operator shall comply with all conditions of this order, the permit to inject, and NDAC Chapter 43-05-01, where applicable. Any noncompliance constitutes a violation and is grounds for enforcement action, including but not limited to termination, revocation, or modification of this order pursuant to NDAC Section 43-05-01-12.

(9) In an administrative action, it shall not be a defense that it would have been necessary for the storage facility operator to halt or reduce the permitted activity in order to maintain compliance with this order, the permit to inject, and NDAC Chapter 43-05-01, where applicable.

(10) The storage facility operator shall take all reasonable steps to minimize or correct any adverse impact on the environment resulting from noncompliance with this order, the permit to inject, and NDAC Chapter 43-05-01, where applicable.

(11) The storage facility operator shall implement and maintain the provided emergency and remedial response plan pursuant to NDAC Section 43-05-01-13.

(12) The storage facility operator shall cease injection immediately, take all steps reasonably necessary to identify and characterize any release, implement the emergency and remedial response plan approved by the Commission, and notify the Commission within 24 hours of carbon dioxide detected above the confining zone.

(13) The storage facility operator shall at all times properly operate and maintain all storage facilities which are installed or used by the storage facility operator to achieve compliance with the conditions of this order, the permit to inject, and NDAC Chapter 43-05-01, where applicable. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of backup or auxiliary facilities or similar systems only when necessary to achieve compliance.

(14) This order may be modified, revoked and reissued, or terminated pursuant to NDAC Section 43-05-01-12. The filing of a request by the storage facility operator for and order modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance, does not stay any condition contained therein.

(15) The injection well permit or the permit to operate an injection well does not convey any property rights of any sort of any exclusive privilege.

(16) The storage facility operator shall furnish to the Director, within a time specified, any information which the Director may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this order, or to determine compliance thereof. The storage facility operator shall also furnish to the Director, upon request, copies of records required to be kept by this order, the permit to inject, and NDAC Chapter 43-05-01, where applicable.

(17) The storage facility operator shall allow the Director, or an authorized representative, upon presentation of credentials and other documents as may be required by law, to:

- (a) Enter upon the storage facility premises where records must be kept pursuant to this order and NDAC Chapter 43-05-01.
- (b) At reasonable times, have access to and copy any records that must be kept pursuant to this order and NDAC Chapter 43-05-01.
- (c) At reasonable times, inspect any facilities, equipment, including monitoring and control equipment, practices, or operations regulated or required pursuant to this order, the permit to inject, and NDAC Chapter 43-05-01.
- (d) At reasonable times, sample or monitor for the purposes of assuring compliance, any substances or parameters at any location.

(18) The storage facility operator shall maintain and comply with the proposed testing and monitoring plan pursuant to NDAC Section 43-05-01-11.4

(19) The storage facility operator shall comply with the reporting requirements provided in NDAC Section 43-05-01-18. The volume of carbon dioxide injected, the average injection rate, surface injection pressure, and down-hole temperature and pressure data shall be reported monthly to the Director on or before the fifth day of the second succeeding month once injection commences regardless of the status of operations, until the injection well is properly plugged and abandoned.

(20) The storage facility operator must obtain an injection well permit under NDAC Section 43-05-01-10 and injection wells must meet the construction and completion requirements in NDAC Section 43-05-01-11.

(21) The storage facility operator shall notify the Director at least 48 hours in advance to witness a mechanical integrity test of the tubing-casing annulus in the injection well. The packer must be set within 100 feet of the upper most perforation and in the 13CR-80 casing, as an exception to NDAC Section 43-05-01-11. However, the packer must also be set within confining zone lithology, within carbon dioxide resistant cement, and not interfere down-hole monitoring equipment.

(22) The storage facility operator shall maintain and comply with the prepared plugging plan pursuant to NDAC Section 43-05-01-11.5.

(23) The storage facility operator shall establish mechanical integrity prior to commencing injection and maintain mechanical integrity pursuant to NDAC Section 43-05-01-11.1.

(24) The storage facility operator shall implement the worker safety plan pursuant to NDAC Section 43-05-01-13.

(25) The storage facility operator shall comply with leak detection and reporting requirements pursuant to NDAC Section 43-05-01-14.

(26) The storage facility operator shall implement the proposed corrosion monitoring and prevention program pursuant to NDAC Section 43-05-01-05.1.

(27) The storage facility operator shall maintain financial responsibility pursuant to NDAC Section 43-05-01-09.1.

(28) The storage facility operator shall maintain and comply with the proposed post-injection site care and facility closure plan pursuant to NDAC Section 43-05-01-19.

(29) The storage facility operator shall notify the Director within 24 hours of failure or malfunction of surface or bottom hole gauges in the proposed McCall #1 injector.

(30) The storage facility operator shall implement surface air and soil gas monitoring as proposed.

(31) This storage facility authorization and permit shall be reviewed at least once every five years from commencement of injection to determine whether it should be modified, revoked, or minor modification made, pursuant to NDAC Section 43-05-01-05.1(4).

(32) The storage facility operator shall pay fees pursuant to NDAC Section 43-05-01-17 annually, no more than thirty days after the receipt of 26 U.S. Code § 45Q tax credits, unless otherwise approved by the Director.

(33) This order shall remain in full force and effect until further order of the Commission.

Dated this 21st day of January, 2022.

INDUSTRIAL COMMISSION
STATE OF NORTH DAKOTA

/s/ Doug Burgum, Governor

/s/ Wayne Stenehjem, Attorney General

/s/ Doug Goehring, Agriculture Commissioner



INDUSTRIAL COMMISSION OF NORTH DAKOTA

Doug Burgum
Governor

Drew H. Wrigley
Attorney General

Doug Goehring
Agriculture Commissioner

I, Karlene Fine, Executive Director and Secretary to the Industrial Commission of North Dakota, do hereby certify that the attached copy of Order No. 31587 issued in Case No. 29033 is a true and exact copy of Order No. 31587 on file in the Office of the Industrial Commission, State Capitol, Bismarck, North Dakota.



A handwritten signature in cursive script, reading "Karlene Fine".

Karlene Fine
Executive Director and Secretary to the Commission
June 17, 2022

BEFORE THE INDUSTRIAL COMMISSION
OF THE STATE OF NORTH DAKOTA

CASE NO. 29033
ORDER NO. 31587

IN THE MATTER OF A HEARING CALLED ON
A MOTION OF THE COMMISSION TO
CONSIDER THE APPLICATION OF MINNKOTA
POWER COOPERATIVE, INC. TO CONSIDER
THE AMALGAMATION OF THE STORAGE
RESERVOIR PORE SPACE, IN WHICH THE
COMMISSION MAY REQUIRE THAT THE
PORE SPACE OWNED BY NONCONSENTING
OWNERS BE INCLUDED IN THE GEOLOGIC
STORAGE FACILITY AND SUBJECT TO
GEOLOGIC STORAGE, AS REQUIRED TO
OPERATE THE MINNKOTA POWER
COOPERATIVE, INC. STORAGE FACILITY
LOCATED IN SECTIONS 35 AND 36, T.142N.,
R.84W., SECTIONS 19, 20, 21, 22, 26, 27, 28, 29,
30, 31, 32, 33, 34 AND 35, T.142N., R.83W.,
SECTIONS 1, 2, 12 AND 13, T.141N., R.84W.,
SECTIONS 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15,
16, 17, 18, 19, 20 AND 21, T.141N., R.83W.,
OLIVER COUNTY, ND IN THE DEADWOOD
FORMATION, PURSUANT TO NDCC SECTION
38-22-10.

ORDER OF THE COMMISSION

THE COMMISSION FINDS:

- (1) This cause came on for hearing at 9:00 a.m. on the 2nd day of November, 2021.
- (2) Case No. 29033 is an application by Minnkota Power Cooperative, Inc. (Minnkota) for an order of the Commission determining the amalgamation of storage reservoir pore space, pursuant to a Geologic Storage Agreement for use of pore space falling within portions of Sections 35 and 36, Township 142 North, Range 84 West, Sections 19, 20, 21, 22, 26, 27, 28, 29, 30, 31, 32, 33, 34, and 35, Township 142 North, Range 83 West, Sections 1, 2, 12, and 13, Township 141 North, Range 84 West, Sections 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 17, 18, 19, 20, and 21, Township 141 North, Range 83 West, Oliver County, North Dakota in the Deadwood Formation, has been signed, ratified, or approved by owners of interest owning at least sixty percent of the pore space interest within said lands, pursuant to North Dakota Century Code (NDCC) 38-22-10.
- (3) Case Nos. 29029, 29030, 29031, 29032, 29033, and 29034 were combined for the purposes of hearing.

(4) Case No. 29029, also on today's docket, is an application by Minnkota for an order authorizing geologic storage of carbon dioxide from the Milton R. Young Station in the amalgamated pore space of the Broom Creek Formation in portions of Sections 35 and 36, Township 142 North, Range 84 West, Sections 19, 20, 21, 22, 26, 27, 28, 29, 30, 31, 32, 33, 34, and 35, Township 142 North, Range 83 West, Sections 1, 2, 12, and 13, Township 141 North, Range 84 West, Sections 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 17, 18, 19, 20, and 21, Township 141 North, Range 83 West, Oliver County, North Dakota, pursuant to North Dakota Administrative Code (NDAC) Chapter 43-05-01.

(5) Case No. 29030, also on today's docket, is an application filed with the Commission by Minnkota for an order of the Commission determining the amalgamation of storage reservoir pore space, pursuant to a Geologic Storage Agreement for use of pore space falling within portions of Sections 35 and 36, Township 142 North, Range 84 West, Sections 19, 20, 21, 22, 26, 27, 28, 29, 30, 31, 32, 33, 34, and 35, Township 142 North, Range 83 West, Sections 1, 2, 12, and 13, Township 141 North, Range 84 West, Sections 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 17, 18, 19, 20, and 21, Township 141 North, Range 83 West, Oliver County, North Dakota in the Broom Creek Formation, has been signed, ratified, or approved by owners of interest owning at least sixty percent of the pore space interest within said lands pursuant to NDCC 38-22-10.

(6) Case No. 29031, also on today's docket, is a motion of the Commission to determine the amount of financial responsibility for the geologic storage of carbon dioxide from the Milton R. Young Station located in portions of Sections 35 and 36, Township 142 North, Range 84 West, Sections 19, 20, 21, 22, 26, 27, 28, 29, 30, 31, 32, 33, 34, and 35, Township 142 North, Range 83 West, Sections 1, 2, 12, and 13, Township 141 North, Range 84 West, Sections 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 17, 18, 19, 20, and 21, Township 141 North, Range 83 West, Oliver County, North Dakota in the Broom Creek Formation, pursuant to NDAC Section 43-05-01-09.1.

(7) Case No. 29032, also on today's docket, is an application by Minnkota for an order authorizing geologic storage of carbon dioxide from the Milton R. Young Station in the amalgamated pore space of the Deadwood Formation in portions of Sections 35 and 36, Township 142 North, Range 84 West, Sections 19, 20, 21, 22, 26, 27, 28, 29, 30, 31, 32, 33, 34, and 35, Township 142 North, Range 83 West, Sections 1, 2, 12, and 13, Township 141 North, Range 84 West, Sections 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 17, 18, 19, 20, and 21, Township 141 North, Range 83 West, Oliver County, North Dakota, pursuant to NDAC Chapter 43-05-01.

(8) Case No. 29034, also on today's docket, is a motion of the Commission to determine the amount of financial responsibility for the geologic storage of carbon dioxide from the Milton R. Young Station located in portions of Sections 35 and 36, Township 142 North, Range 84 West, Sections 19, 20, 21, 22, 26, 27, 28, 29, 30, 31, 32, 33, 34, and 35, Township 142 North, Range 83 West, Sections 1, 2, 12, and 13, Township 141 North, Range 84 West, Sections 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 17, 18, 19, 20, and 21, Township 141 North, Range 83 West, Oliver County, North Dakota in the Deadwood Formation, pursuant to NDAC Section 43-05-01-09.1.

(9) The record in these matters was left open to receive additional information from Minnkota. Such information was received on November 16, December 8 and December 10, 2021, and the record was closed.

(10) Pursuant to NDCC Section 38-22-06 and NDAC Section 43-05-01-08: The notice of filing of the application and petition and the time and place of hearing thereof was given, and that at least 45 days prior to the hearing, Minnkota, as the applicant, did give notice of the time and place of said hearing and the Commission has accepted the notice as adequate, and that the applicant did, at least 45 days prior to the hearing, file with the Commission engineering, geological and other technical exhibits to be used and which were used at said hearing, and that the notice so given did specify that such material was filed with the Commission; that due public notice having been given, as required by law, the Commission has jurisdiction of this cause and the subject matter.

(11) The Commission gave at least a thirty-day public notice and comment period for the draft storage facility permit and issued all notices using methods required to all entities under NDCC Section 38-22-06 and NDAC Section 43-05-01-08. Publication was made September 29, 2021, and the comment period for written comments ended at 5:00 PM CDT November 1, 2021. The hearing was open to the public to appear and provide comments.

(12) Order No. 31586 entered in Case No. 29032 created the Minnkota Center MRYS Deadwood Storage Facility #1.

(13) The plan for amalgamation proposed by Minnkota includes a Geologic Storage Agreement for the Deadwood Formation for certain lands in Oliver County, North Dakota.

(14) The area proposed to be included within the amalgamation area of the storage facility is as follows:

TOWNSHIP 142 NORTH, RANGE 84 WEST

THE S/2 SE/4 OF SECTION 35, AND THE S/2 OF SECTION 36,

TOWNSHIP 142 NORTH, RANGE 83 WEST

ALL OF SECTIONS 28, 29, 31, 32, 33 AND 34, THE SE/4 SE/4 OF SECTION 19, THE SE/4 AND S/2 SW/4 OF SECTION 20, THE S/2 AND S/2 N/2 OF SECTION 21, THE SW/4 NW/4, W/2 SW/4, AND SE/4 SW/4 OF SECTION 22, THE SW/4 AND SW/4 SE/4 OF SECTION 26, THE W/2, SE/4, AND W/2 NE/4 OF SECTION 27, THE E/2, E/2 SW/4, AND SE/4 NW/4 OF SECTION 30, AND THE W/2, NE/4, AND W/2 SE/4 OF SECTION 35,

TOWNSHIP 141 NORTH, RANGE 84 WEST

ALL OF SECTIONS 1 AND 12, THE E/2, E/2 SW/4, AND E/2 E/2 NW/4 OF SECTION 2, AND THE NE/4, E/2 NW/4, AND NE/4 SE/4 OF SECTION 13,

TOWNSHIP 141 NORTH, RANGE 83 WEST

ALL OF SECTIONS 2, 3, 4, 5, 6, 7, 8, 9, 10, 16, 17 AND 18, THE W/2 SW/4 OF SECTION 1, THE W/2, NE/4, W/2 SE/4, AND NE/4 SE/4 OF SECTION 11, THE W/2 NW/4, NE/4 NW/4, AND NW/4 SW/4 OF SECTION 12, THE N/2 NW/4, SE/4 NW/4, NW/4 NE/4, W/2 SW/4 NW/4, AND NE/4 SW/4 NW/4 OF SECTION 14, THE N/2 N/2, SE/4 NE/4, AND SW/4 NW/4 OF SECTION 15, THE N/2 N/2, SE/4 NW/4, AND SE/4 NE/4 OF SECTION 19, THE N/2 OF SECTION 20, AND THE W/2, W/2 NE/4, AND NW/4 SE/4 OF SECTION 21.

(15) Minnkota is proposing a one-phase formula for the calculation of tract participation, allocating 100% to surface acres.

“Surface acres” means the number of acres within each respective tract.

(16) Pursuant to NDCC Section 47-31-03, title to pore space in all strata underlying surface lands and waters is vested in the owner of the overlying surface estate.

No pore space has been leased out by pore space owners prior to this agreement. Minnkota did not find instances of pore space being severed from the surface estate that was allowed prior to April 9, 2009.

(17) A one-phase formula based on surface acres will fairly compensate owners farther away from the injection well that will eventually have pore space occupied by carbon dioxide. Minnkota testified to a lack of history matched data for carbon dioxide saturation rates in the Deadwood Formation for a pore volume allocation methodology that would fairly apportion use of pore space. Minnkota owns the pore space where the injection wells are to be located. Minnkota indicates that the majority of carbon dioxide stored will remain in close proximity to the well bores for an extensive period of time, making Minnkota the primary beneficiary of a pore volume formula. Computational modeling performed by Minnkota and the Commission supports Minnkota’s assessment.

The Commission believes capillary trapping, relative permeability hysteresis, and a lack of local area history matching data from injection of carbon dioxide into the saline Deadwood Formation reservoir provides reasonable doubt for the utility of a pore volume formula. The Commission believes the 100% weighting on surface acreage is acceptable and that the one-phase formula is protective of correlative rights and should not be modified.

(18) Minnkota delineated the tracts to be utilized through computational modeling based on site characterization as required by NDAC Section 43-05-01-05.1. The data acquired during site characterization as well as the reservoir model and all inputs were provided to the Commission. The Commission evaluated the storage reservoir utilizing data acquired during site characterization and other publicly available data before performing computational simulation. The Commission concludes that Minnkota’s inclusion of pore space that will be affected by the project has been adequately delineated.

Minnkota proposes amalgamating the same reservoir pore space for the Deadwood reservoir as proposed in Case No. 29030 for the Broom Creek reservoir. A total of 4 million metric tons per year for 15 years, followed by 3.5 million metric tons per year for the final 5 years are planned to

be injected into the Deadwood and Broom Creek reservoirs. Simulation inputs considered a maximum injection of 4 million metric tons per year for 15 years and 3.5 million metric tons for the final 5 years into the Broom Creek, and 1.17 million metric tons per year into the Deadwood for the life of the storage facility. Simulation outputs for the Deadwood utilize less pore space than the Broom Creek and fall within the same defined storage facility boundary. There is significant overlap in surface ownership if the Deadwood were to be fully utilized. There is the potential that the Deadwood will be utilized to a lesser extent than proposed or not at all, making an alternate land proposal from the Broom Creek not feasible at this time. This finding is to be re-evaluated at the 5-year review.

(19) The Geologic Storage Agreement contains fair, reasonable, and equitable provisions for:

- (a) The amalgamation of pore space interests for the storage of carbon dioxide within said pore spaces of the storage reservoir.
- (b) The division of interest or formula for the apportionment and allocation of carbon dioxide to be stored.
- (c) The measurement of quantity of carbon dioxide injected into the pore spaces underlying the delineated storage facility.
- (d) The enlargement or reduction of the delineation of pore space utilized for geologic storage of carbon dioxide which may be warranted by review pursuant to NDAC Section 43-05-01-05.1(4).
- (e) The time when the Geologic Storage Agreement shall become effective.
- (f) The time when, conditions under, and the method by which the Geologic Storage Agreement shall be or may be terminated and its affairs wound up.

(20) Such amalgamation of the storage reservoir's pore space and the Geologic Storage Agreement are in the public interest, and require procedures that promote, in a manner fair to all interested, cooperative management, thereby ensuring the maximum use of natural resources, and that said Geologic Storage Agreement, as contained therein, appears to conform and comply with the provisions and requirements of NDCC Section 38-22-08.

(21) NDCC Section 38-22-10 provides that the Commission may require that the pore space owned by nonconsenting owners be included in a storage facility and subject to geological storage, if a storage operator does not obtain the consent of all persons who own the storage reservoir's pore space.

(22) Pursuant to NDAC Section 43-05-01-08(2)(e), the required notice given by Minnkota included a statement that amalgamation of the storage reservoir's pore space is required to operate the storage facility, that the Commission may require that the pore space owned by nonconsenting owners be included in the storage facility and subject to geologic storage, and that the amalgamation of pore space will be considered at the hearing.

(23) The approval of this application is in the public interest by promoting the policy stated in NDCC Section 38-22-01.

IT IS THEREFORE ORDERED:

(1) The amalgamation of pore space in the Minnkota Center MRYS Deadwood Storage Facility #1 in Oliver County, North Dakota, is hereby approved.

(2) The Geologic Storage Agreement for the Deadwood Formation is hereby incorporated in this order by reference, and shall apply to the same extent and with the same force and effect as if actually set forth herein; that said Geologic Storage Agreement for the amalgamated pore space therein is approved, all to the same extent and with the same force and effect as if set forth herein in its entirety; that if said Geologic Storage Agreement does not in all respects conform to and comply with the provisions and requirements under NDCC Chapter 38-22, the statute shall prevail.

(3) The amalgamated pore space is hereby defined as the following described tracts of land in Oliver County, North Dakota:

TOWNSHIP 142 NORTH, RANGE 84 WEST

THE S/2 SE/4 OF SECTION 35, AND THE S/2 OF SECTION 36,

TOWNSHIP 142 NORTH, RANGE 83 WEST

ALL OF SECTIONS 28, 29, 31, 32, 33 AND 34, THE SE/4 SE/4 OF SECTION 19, THE SE/4 AND S/2 SW/4 OF SECTION 20, THE S/2 AND S/2 N/2 OF SECTION 21, THE SW/4 NW/4, W/2 SW/4, AND SE/4 SW/4 OF SECTION 22, THE SW/4 AND SW/4 SE/4 OF SECTION 26, THE W/2, SE/4, AND W/2 NE/4 OF SECTION 27, THE E/2, E/2 SW/4, AND SE/4 NW/4 OF SECTION 30, AND THE W/2, NE/4, AND W/2 SE/4 OF SECTION 35,

TOWNSHIP 141 NORTH, RANGE 84 WEST

ALL OF SECTIONS 1 AND 12, THE E/2, E/2 SW/4, AND E/2 E/2 NW/4 OF SECTION 2, AND THE NE/4, E/2 NW/4, AND NE/4 SE/4 OF SECTION 13,

TOWNSHIP 141 NORTH, RANGE 83 WEST

ALL OF SECTIONS 2, 3, 4, 5, 6, 7, 8, 9, 10, 16, 17 AND 18, THE W/2 SW/4 OF SECTION 1, THE W/2, NE/4, W/2 SE/4, AND NE/4 SE/4 OF SECTION 11, THE W/2 NW/4, NE/4 NW/4, AND NW/4 SW/4 OF SECTION 12, THE N/2 NW/4, SE/4 NW/4, NW/4 NE/4, W/2 SW/4 NW/4, AND NE/4 SW/4 NW/4 OF SECTION 14, THE N/2 N/2, SE/4 NE/4, AND SW/4 NW/4 OF SECTION 15, THE N/2 N/2, SE/4 NW/4, AND SE/4 NE/4 OF SECTION 19, THE N/2 OF SECTION 20, AND THE W/2, W/2 NE/4, AND NW/4 SE/4 OF SECTION 21.

(4) The storage reservoir containing the amalgamated pore space is hereby defined as the stratigraphic interval from below the top of the Icebox Formation, found at a depth of 9,161 feet below the Kelly Bushing, to above the base of the Deadwood B Member, found at a depth of 9,655 feet below the Kelly Bushing, as identified by the Array Induction Gamma log run in the J-ROC1 #1 well (File No. 37672), located in the SW/4 NW/4 of Section 4, Township 141 North, Range 83 West, Oliver County, North Dakota.

(5) The injection of carbon dioxide into the amalgamated pore space by the operator for the purpose of storage of carbon dioxide is authorized through the proposed McCall #1 well, to be located 1,978 feet from the north line and 257 feet from the west line of Section 4, Township 141 North, Range 83 West, Oliver County, North Dakota; provided, however, that prior to the commencement of such injection the operator shall obtain such permits as are required under NDAC Chapter 43-05-01.

(6) The termination of the amalgamation of lands hereinbefore described in paragraph (3) above shall be as prescribed in the Geologic Storage Agreement or at project completion as provided by NDCC Section 38-22-17; and that notwithstanding any provisions to the contrary, in the event that the operator fails to commence or ceases storage operations, the Commission, upon its own motion, after notice and hearing, may consider rescinding this order, or any portion thereof, so that this order of amalgamation will terminate and cease to exist.

(7) The effective date of the amalgamation of pore space in the lands hereinbefore described in paragraph (3) above shall be at 7:00 a.m. on the first day of February, 2021.

(8) No well, other than those proposed in Order No. 31586, shall be hereafter drilled and completed in or injected into in the amalgamated pore space, as defined herein, without order of the Commission after due notice and hearing.

(9) This order shall be reviewed when a review of Order No. 31586 is conducted.

(10) This order shall cover all of the amalgamated pore space, as defined herein, and continues in full force and effect until further order of the Commission.

Dated this 21st day of January, 2022.

INDUSTRIAL COMMISSION
STATE OF NORTH DAKOTA

/s/ Doug Burgum, Governor

/s/ Wayne Stenehjem, Attorney General

/s/ Doug Goehring, Agriculture Commissioner



INDUSTRIAL COMMISSION OF NORTH DAKOTA

Doug Burgum
Governor

Drew H. Wrigley
Attorney General

Doug Goehring
Agriculture Commissioner

I, Karlene Fine, Executive Director and Secretary to the Industrial Commission of North Dakota, do hereby certify that the attached copy of Order No. 31588 issued in Case No. 29034 is a true and exact copy of Order No. 31588 on file in the Office of the Industrial Commission, State Capitol, Bismarck, North Dakota.



Handwritten signature of Karlene Fine in black ink.

Karlene Fine
Executive Director and Secretary to the Commission
June 17, 2022

BEFORE THE INDUSTRIAL COMMISSION
OF THE STATE OF NORTH DAKOTA

CASE NO. 29034
ORDER NO. 31588

IN THE MATTER OF A HEARING CALLED ON A MOTION OF THE COMMISSION TO CONSIDER THE APPLICATION OF MINNKOTA POWER COOPERATIVE, INC. FOR AN ORDER OF THE COMMISSION DETERMINING THE AMOUNT OF FINANCIAL RESPONSIBILITY FOR THE GEOLOGIC STORAGE OF CARBON DIOXIDE FROM THE MILTON R. YOUNG STATION LOCATED IN SECTIONS 35 AND 36, T.142 N., R.84W., SECTIONS 19, 20, 21, 22, 26, 27, 28, 29, 30, 31, 32, 33, 34 AND 35, T.142N., R.83W., SECTIONS 1, 2, 12 AND 13, T.141N., R.84W., SECTIONS 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 17, 18, 19, 20 AND 21, T.141N., R.83W., OLIVER COUNTY, ND PURSUANT TO NDAC SECTION 43-05-01-09.1.

ORDER OF THE COMMISSION

THE COMMISSION FINDS:

- (1) This cause came on for hearing at 9:00 a.m. on the 2nd day of November, 2021.
- (2) This case is a motion of the Commission to determine the amount of financial responsibility to be required of Minnkota Power Cooperative, Inc. (Minnkota) for geologic storage of carbon dioxide in the amalgamated storage reservoir pore space of the Deadwood Formation within Sections 35 and 36, Township 142 North, Range 84 West, Sections 19, 20, 21, 22, 26, 27, 28, 29, 30, 31, 32, 33, 34, and 35, Township 142 North, Range 83 West, Sections 1, 2, 12, and 13, Township 141 North, Range 84 West, Sections 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 17, 18, 19, 20, and 21, Township 141 North, Range 83 West, Oliver County, North Dakota, pursuant to North Dakota Administrative Code (NDAC) Section 43-05-01-09.1, and such relief as is appropriate.
- (3) Case Nos. 29029, 29030, 29031, 29032, 29033, and 29034 were combined for the purposes of hearing.
- (4) Case No. 29029, also on today's docket, is an application by Minnkota for an order authorizing geologic storage of carbon dioxide from the Milton R. Young Station in the amalgamated pore space of the Broom Creek Formation in portions of Sections 35 and 36, Township 142 North, Range 84 West, Sections 19, 20, 21, 22, 26, 27, 28, 29, 30, 31, 32, 33, 34, and 35, Township 142 North, Range 83 West, Sections 1, 2, 12, and 13, Township 141 North,

Range 84 West, Sections 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 17, 18, 19, 20, and 21, Township 141 North, Range 83 West, Oliver County, North Dakota, pursuant to NDAC Chapter 43-05-01.

(5) Case No. 29030, also on today's docket, is an application filed with the Commission by Minnkota for an order of the Commission determining the amalgamation of storage reservoir pore space, pursuant to a Geologic Storage Agreement for use of pore space falling within portions of Sections 35 and 36, Township 142 North, Range 84 West, Sections 19, 20, 21, 22, 26, 27, 28, 29, 30, 31, 32, 33, 34, and 35, Township 142 North, Range 83 West, Sections 1, 2, 12, and 13, Township 141 North, Range 84 West, Sections 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 17, 18, 19, 20, and 21, Township 141 North, Range 83 West, Oliver County, North Dakota in the Broom Creek Formation, has been signed, ratified, or approved by owners of interest owning at least sixty percent of the pore space interest within said lands pursuant to North Dakota Century Code (NDCC) 38-22-10.

(6) Case No. 29031, also on today's docket, is a motion of the Commission to determine the amount of financial responsibility for the geologic storage of carbon dioxide from the Milton R. Young Station located in portions of Sections 35 and 36, Township 142 North, Range 84 West, Sections 19, 20, 21, 22, 26, 27, 28, 29, 30, 31, 32, 33, 34, and 35, Township 142 North, Range 83 West, Sections 1, 2, 12, and 13, Township 141 North, Range 84 West, Sections 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 17, 18, 19, 20, and 21, Township 141 North, Range 83 West, Oliver County, North Dakota in the Broom Creek Formation, pursuant to NDAC Section 43-05-01-09.1.

(7) Case No. 29032, also on today's docket, is an application by Minnkota for an order authorizing geologic storage of carbon dioxide from the Milton R. Young Station in the amalgamated pore space of the Deadwood Formation in portions of Sections 35 and 36, Township 142 North, Range 84 West, Sections 19, 20, 21, 22, 26, 27, 28, 29, 30, 31, 32, 33, 34, and 35, Township 142 North, Range 83 West, Sections 1, 2, 12, and 13, Township 141 North, Range 84 West, Sections 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 17, 18, 19, 20, and 21, Township 141 North, Range 83 West, Oliver County, North Dakota, pursuant to NDAC Chapter 43-05-01.

(8) Case No. 29033, also on today's docket, is an application filed with the Commission by Minnkota for an order of the Commission determining the amalgamation of storage reservoir pore space, pursuant to a Geologic Storage Agreement for use of pore space falling within portions of Sections 35 and 36, Township 142 North, Range 84 West, Sections 19, 20, 21, 22, 26, 27, 28, 29, 30, 31, 32, 33, 34, and 35, Township 142 North, Range 83 West, Sections 1, 2, 12, and 13, Township 141 North, Range 84 West, Sections 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 17, 18, 19, 20, and 21, Township 141 North, Range 83 West, Oliver County, North Dakota in the Deadwood Formation, has been signed, ratified, or approved by owners of interest owning at least sixty percent of the pore space interest within said lands pursuant to NDCC 38-22-10.

(9) The record in these matters was left open to receive additional information from Minnkota. Such information was received on November 16, December 8, and December 10, 2021, and the record was closed.

(10) Order No. 31586 entered in Case No. 29032 created the Minnkota Center MRYS Deadwood Storage Facility #1; and Order No. 31587 entered in Case No. 29033 determined said storage facility will become effective February 1, 2022.

(11) Minnkota outlined its proposed qualifying financial responsibility instruments to be utilized to demonstrate financial responsibility pursuant to NDAC Section 43-05-01-09.1.

(12) Pursuant to NDAC Section 43-05-01-09.1 the qualifying financial responsibility instruments must cover the cost of:

- (a) Corrective action that meets the requirements of NDAC Section 43-05-01-05.1.
- (b) Injection well plugging that meets the requirements of NDAC Section 43-05-01-11.5.
- (c) Postinjection site care and facility closure that meets the requirements of NDAC Section 43-05-01-19.
- (d) Emergency and remedial response that meets the requirements of NDAC Section 43-05-01-13.

(13) Minnkota demonstrated that corrective action pursuant to NDAC Section 43-05-01-05.1 is not necessary within the delineated area of review. The Commission agrees with Minnkota's demonstration.

(14) Minnkota estimates the injection well plugging cost pursuant to NDAC Section 43-05-01-11.5 to be \$2,025,000 total for three wells. The Commission accepts this as a conservative estimate.

(15) The Minnkota Center MRYS Deadwood Storage Facility #1 will have one injection well, the proposed McCall #1 well, to be located 1,978 feet from the north line and 257 feet from the west line of Section 4, Township 141 North, Range 83 West; and one monitor well, the proposed NRDT #1 well, to be located 2,148 feet from the south line and 691 feet from the east line of Section 34, Township 142 North, Range 83 West, Oliver County, North Dakota. Minnkota proposes covering the plugging of injection and monitoring wells with a trust fund with initial funding of \$2,120,000, paid in prior to injection, and paying in an additional \$17,704,000 in seven equal installments at least seven days prior to successive anniversaries of injection permit issuance, totaling \$19,824,000. Trust funds are a qualifying financial responsibility instrument under NDAC Section 43-05-01-09.1

(16) Minnkota estimates the postinjection site care financial responsibility pursuant to NDAC Section 43-05-01-19 is \$10,285,000 and is proposed to be covered by the aforementioned \$19,824,000 trust fund, that is deemed a qualifying financial responsibility instrument under NDAC Section 43-05-01-09.1.

(17) Minnkota estimates the facility closure financial responsibility pursuant to NDAC Section 43-05-01-19 is \$1,554,000 and is proposed to be covered by the aforementioned \$19,824,000 trust fund, that is deemed a qualifying financial responsibility instrument under NDAC Section 43-05-01-09.1.

(18) Minnkota estimates the emergency and remedial response costs pursuant to NDAC Section 43-05-01-13 by considering a conservative scenario where a significant volume of briny water rises to the surface. Historic price data from projects managed by Oxy Low Carbon Ventures, cost quotes from third-party companies, regulatory guidance documents, and professional judgement about the level of effort required to complete the activity was considered. Minnkota's estimate for the emergency and remedial response actions is \$16,560,000 and is proposed to be covered by the aforementioned \$19,824,000 trust fund in part, in the amount of \$5,960,000, and is deemed a qualifying financial responsibility instrument under NDAC Section 43-05-01-09.1. The remaining \$10,600,000 is proposed to be covered by a \$10,600,000 commercial insurance policy, also deemed a qualifying financial responsibility instrument under NDAC Section 43-05-01-09.1. Pursuant to NDAC 43-05-01-09.1, utilizing more than one financial instrument for a specific geologic sequestration phase must be limited to instruments that are not based on financial strength or performance. A trust fund and commercial insurance policy qualify to be combined under this requirement.

(19) Minnkota estimates the risk to an underground source of drinking water by considering a subsurface leak scenario. Costs to be covered include delineation of groundwater, and a 10-year period of quarterly monitoring and reporting after remedial actions are taken. The estimated cost is \$2,240,000 and is proposed to be covered by the aforementioned \$10,600,000 commercial insurance policy, that is deemed a qualifying financial responsibility instrument under NDAC Section 43-05-01-09.1.

(20) The Commission should set minimum amounts of qualifying financial responsibility for injection well plugging, postinjection site care and facility closure, and emergency and remedial response.

(21) Financial responsibility is provided for the same wells and lands in the Minnkota Center MRYS Deadwood Storage Facility #1 and the Minnkota Center MRYS Broom Creek Storage Facility #1.

IT IS THEREFORE ORDERED:

(1) Minnkota Power Cooperative, Inc., its assigns and successors, is hereby required to maintain financial responsibility with qualifying instruments in the minimum amounts specified in paragraph (2) below, pursuant to NDAC Section 43-05-01-09.1, covering the Minnkota Center MRYS Deadwood Storage Facility #1 and the Minnkota Center MRYS Broom Creek Storage Facility #1 in Oliver County, North Dakota.

(2) The minimum amount for injection well plugging that meets the requirements of NDAC Section 43-05-01-11.5 is a \$2,025,000 for 3 injection wells.

The minimum amount for postinjection site care and facility closure that meets the requirements of NDAC Section 43-05-01-19 is \$11,839,000.

The minimum amount for emergency and remedial response that meets the requirements of NDAC Section 43-05-01-13 is \$16,560,000.

- (3) This order shall be reviewed when a review of Order No. 31586 is conducted.
- (4) This order shall remain in full force and effect until further order of the Commission.

Dated this 21st day of January, 2022.

INDUSTRIAL COMMISSION
STATE OF NORTH DAKOTA

/s/ Doug Burgum, Governor

/s/ Wayne Stenehjem, Attorney General

/s/ Doug Goehring, Agriculture Commissioner

Kadrmass, Bethany R.

From: Entzi-Odden, Lyn <lodden@fredlaw.com>
Sent: Friday, December 10, 2021 3:48 PM
To: Kadrmass, Bethany R.
Cc: Bender, Lawrence; Shannon Mikula
Subject: Minnkota additional materials for filing Cases 29029-34
Attachments: Supplementalinformation_BC_SFP_at2064-09Dec2021.pptx

***** **CAUTION:** This email originated from an outside source. Do not click links or open attachments unless you know they are safe. *****

Bethany,

In response to your December 8, 2021 email with regard to “Molar mass dissolution/distribution for anhydrite as previously submitted, at the end of simulation”, please see the attached.

Minnkota indicates as follows:

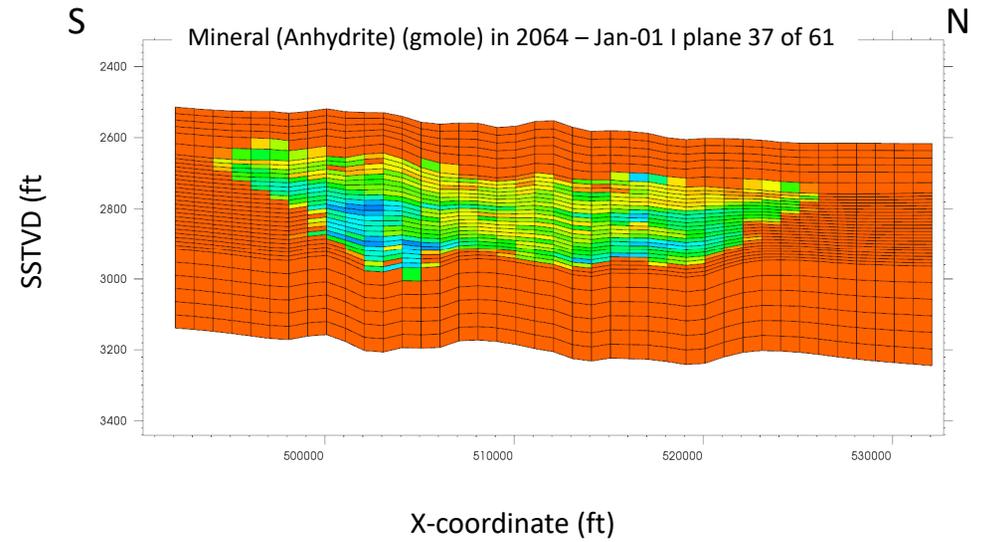
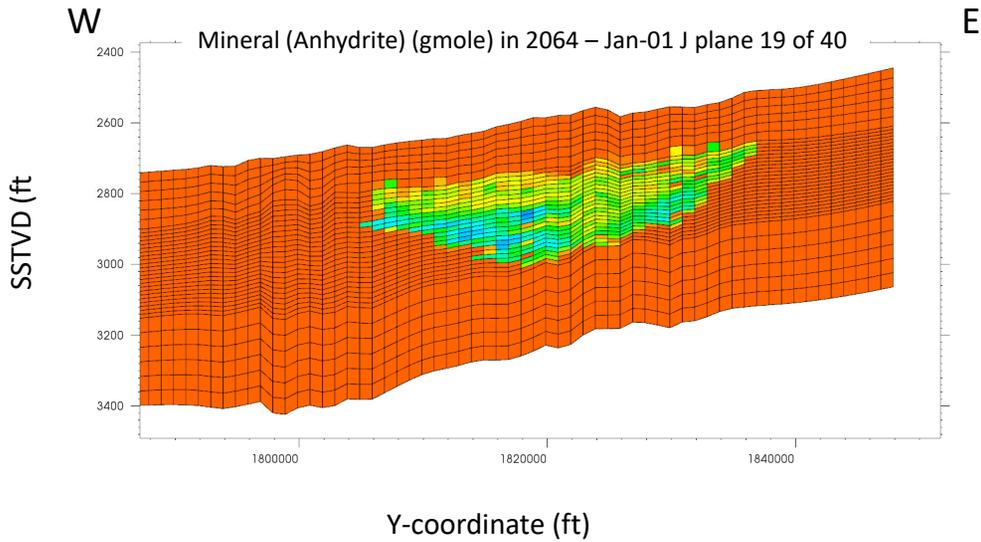
The simulation end date was 42 years after commencement of injection, not 45 years. The molarity model simulations was run for term of injection plus 20 years post injection, this can be found on page 2-32 of permits. The reference to page 2-54 an explanation on 2-52 indicating the 45 year overestimation done on the geochemistry model, which is a distinct simulation than that of the molar mass simulation.

Please advise if anything additional is required.

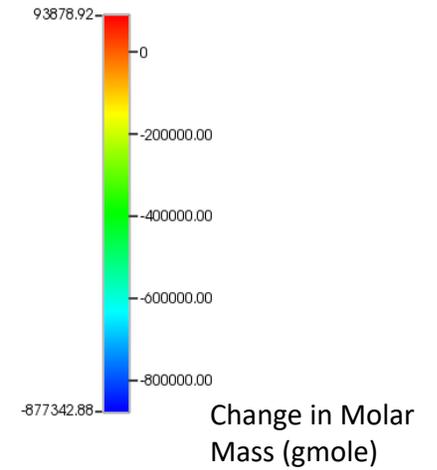
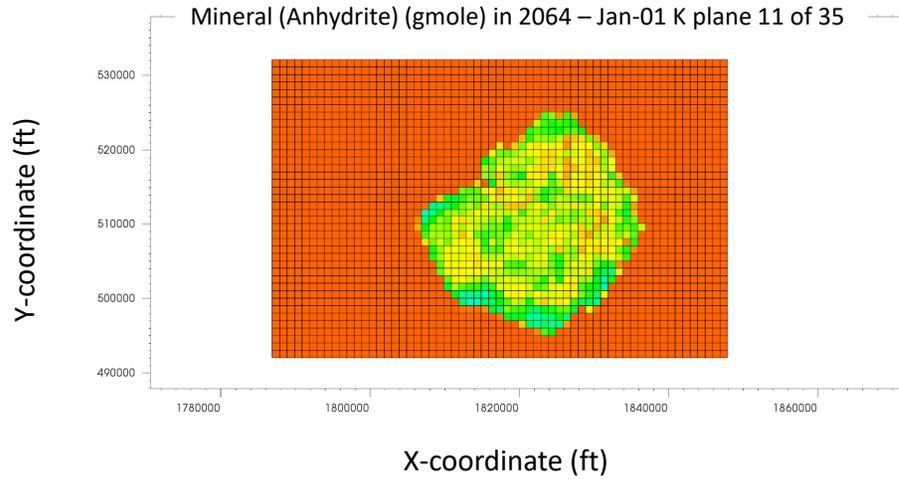
Thank you.

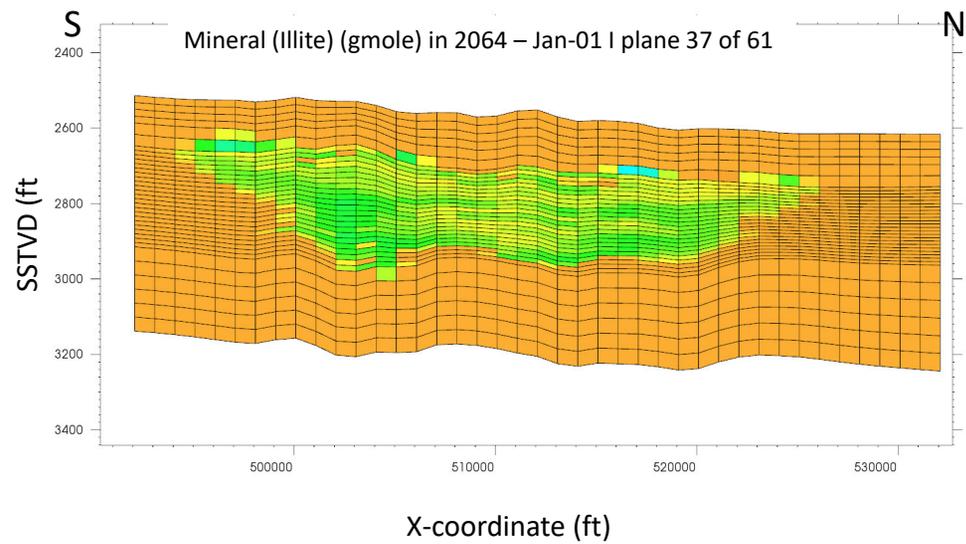
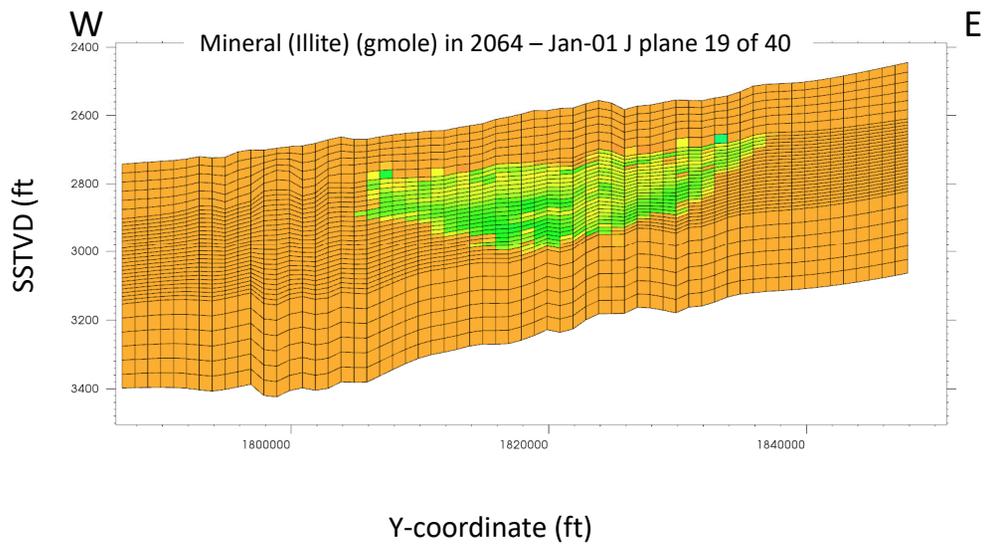


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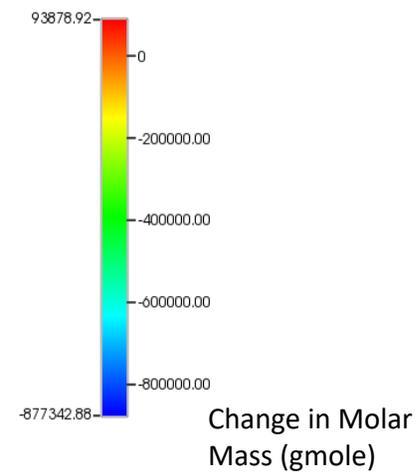
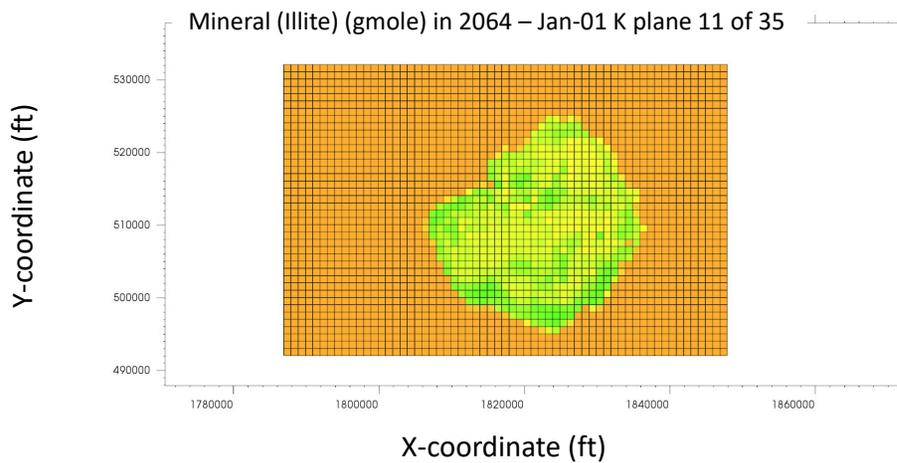


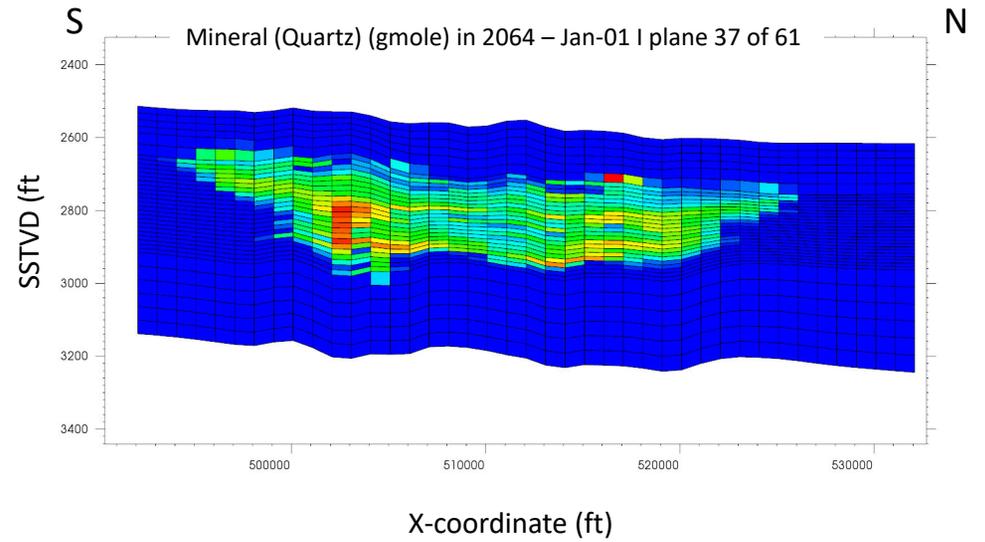
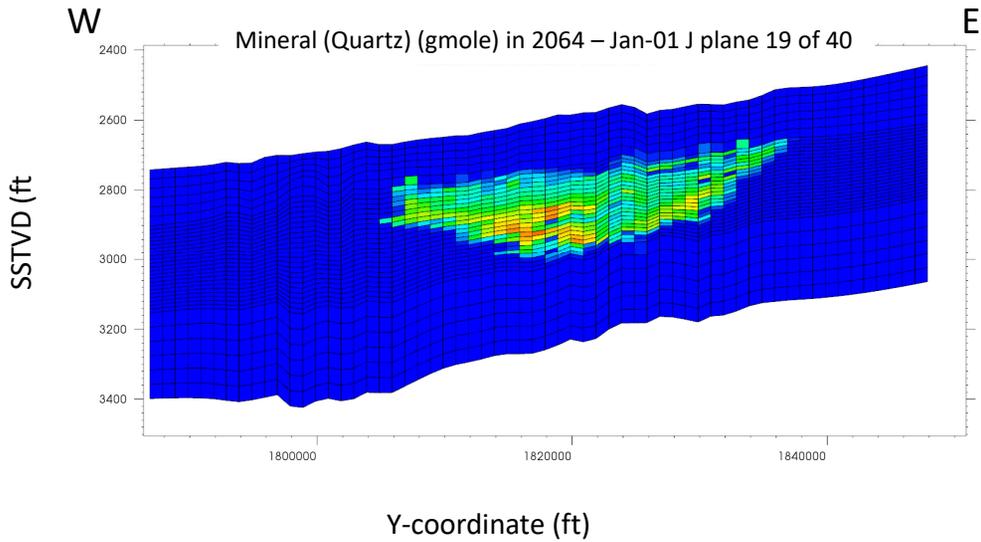
BC5 – molar mass
dissolution/distribution
for anhydrite



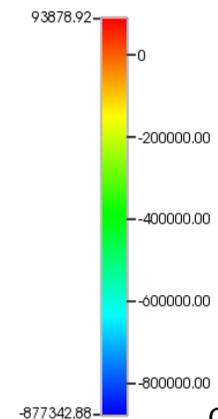
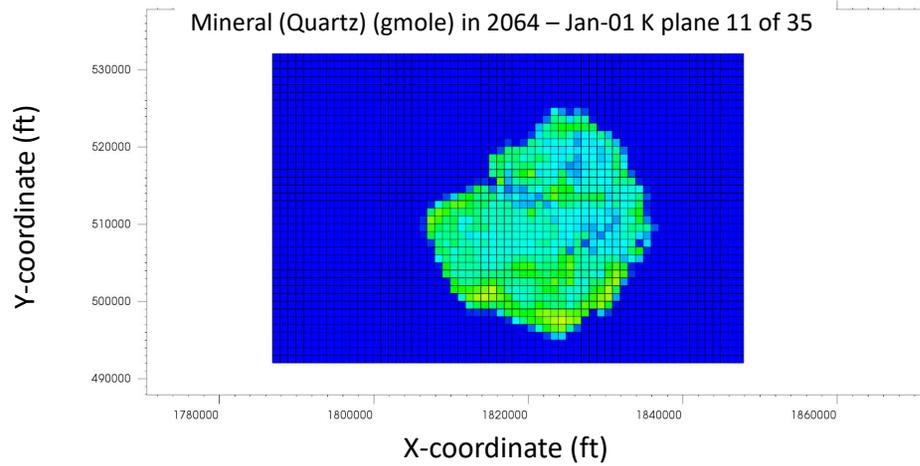


BC5 – molar mass
dissolution/distribution
for Illite





BC5 – molar mass
dissolution/distribution
for Quartz



Change in Molar
Mass (gmole)

Kadrmass, Bethany R.

From: Kadrmass, Bethany R.
Sent: Wednesday, December 8, 2021 1:22 PM
To: Bender, Lawrence
Cc: Entzi-Odden, Lyn
Subject: FW: Minnkota Corrections/Additions to Supplemental Filing CASES 29029-34
Attachments: BC4_a.tiff; BC4_b.tiff; BC7.tiff; DW4_a.tiff; DW4_b.tiff; DW11.tiff; Narrative Summary of Wellbore Instability_J-ROC1.docx; Supplementalinformation_BC_SFP-03Dec2021-BC5.pptx; Minnkota B Kadrmass letter.pdf

Lawrence,

Commission staff requested "Molar mass dissolution/distribution for anhydrite as previously submitted, at the end of simulation". It appears the supplement provided used year 2042. If this is end of simulation, please address the difference from the dissolution/precipitation timeframe given on page 2-54.

Thank you,

Bethany Kadrmass

Legal Assistant, Oil and Gas Division

701.328.8020 • brkadrmass@nd.gov • www.dmr.nd.gov



600 E Boulevard Ave, Dept. 405 • Bismarck, ND 58505

From: Entzi-Odden, Lyn <lodden@fredlaw.com>
Sent: Wednesday, December 8, 2021 9:38 AM
To: Kadrmass, Bethany R. <brkadrmass@nd.gov>
Cc: Bender, Lawrence <LBender@fredlaw.com>; Shannon Mikula <smikula@minnkota.com>
Subject: Minnkota Corrections/Additions to Supplemental Filing CASES 29029-34

***** **CAUTION:** This email originated from an outside source. Do not click links or open attachments unless you know they are safe. *****

Bethany,

As requested, please see the attached for filing and the link below with regard to Minnkota's corrections/additions to the supplemental information initially submitted. If you have any issues opening the link, please advise.

Thank you.

https://undeerc-my.sharepoint.com/:f/g/personal/hvettleson_undeerc_org/EjZO_8_-OLJPswYzFdRIEFYBrw-VXb1zFJjmubvFEpL6rA?e=ATNkt1



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Kadrmass, Bethany R.

From: Entzi-Odden, Lyn <lodden@fredlaw.com>
Sent: Wednesday, December 8, 2021 9:38 AM
To: Kadrmass, Bethany R.
Cc: Bender, Lawrence; Shannon Mikula
Subject: Minnkota Corrections/Additions to Supplemental Filing CASES 29029-34
Attachments: BC4_a.tiff; BC4_b.tiff; BC7.tiff; DW4_a.tiff; DW4_b.tiff; DW11.tiff; Narrative Summary of Wellbore Instability_J-ROC1.docx; Supplementalinformation_BC_SFP-03Dec2021-BC5.pptx; Minnkota B Kadrmass letter.pdf

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Bethany,

As requested, please see the attached for filing and the link below with regard to Minnkota's corrections/additions to the supplemental information initially submitted. If you have any issues opening the link, please advise.

Thank you.



This is a transmission from the law firm of Fredrikson & Byron, P.A. and may contain information which is privileged, confidential, and protected by the attorney-client or attorney work product privileges. If you are not the addressee, note that any disclosure, copying, distribution, or use of the contents of this message is prohibited. If you have received this transmission in error, please destroy it and notify us immediately at our telephone number (701) 221-8700. The name and biographical data provided above are for informational purposes only and are not intended to be a signature or other indication of an intent by the sender to authenticate the contents of this electronic message.

December 7, 2021

VIA EMAIL

Ms. Bethany Kadrmas
Oil and Gas Division
ND Dept of Mineral Resources
600 E Boulevard Ave, Dept. 405
Bismarck, ND 58505

**RE: Cases 29029, 29030, 29031, 29032,
29033, 29034
Supplements Requested at Hearing
on November 2, 2021
Minnkota Power Cooperative, Inc.**

Dear Ms. Kadrmas:

As requested in your email dated November 29, 2021, please find attached herewith corrections or additions to the supplements previously submitted by Minnkota Power Cooperative, Inc.

Should you have any questions, please advise.

Sincerely,

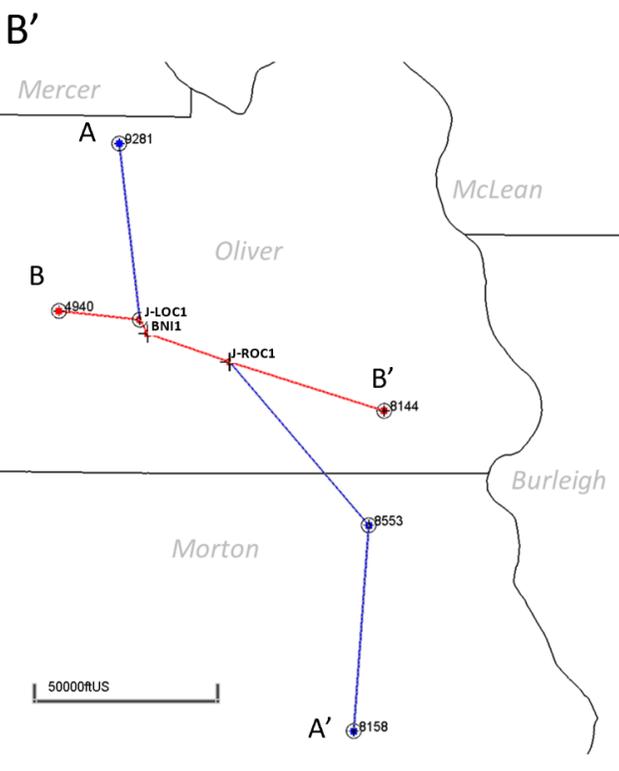
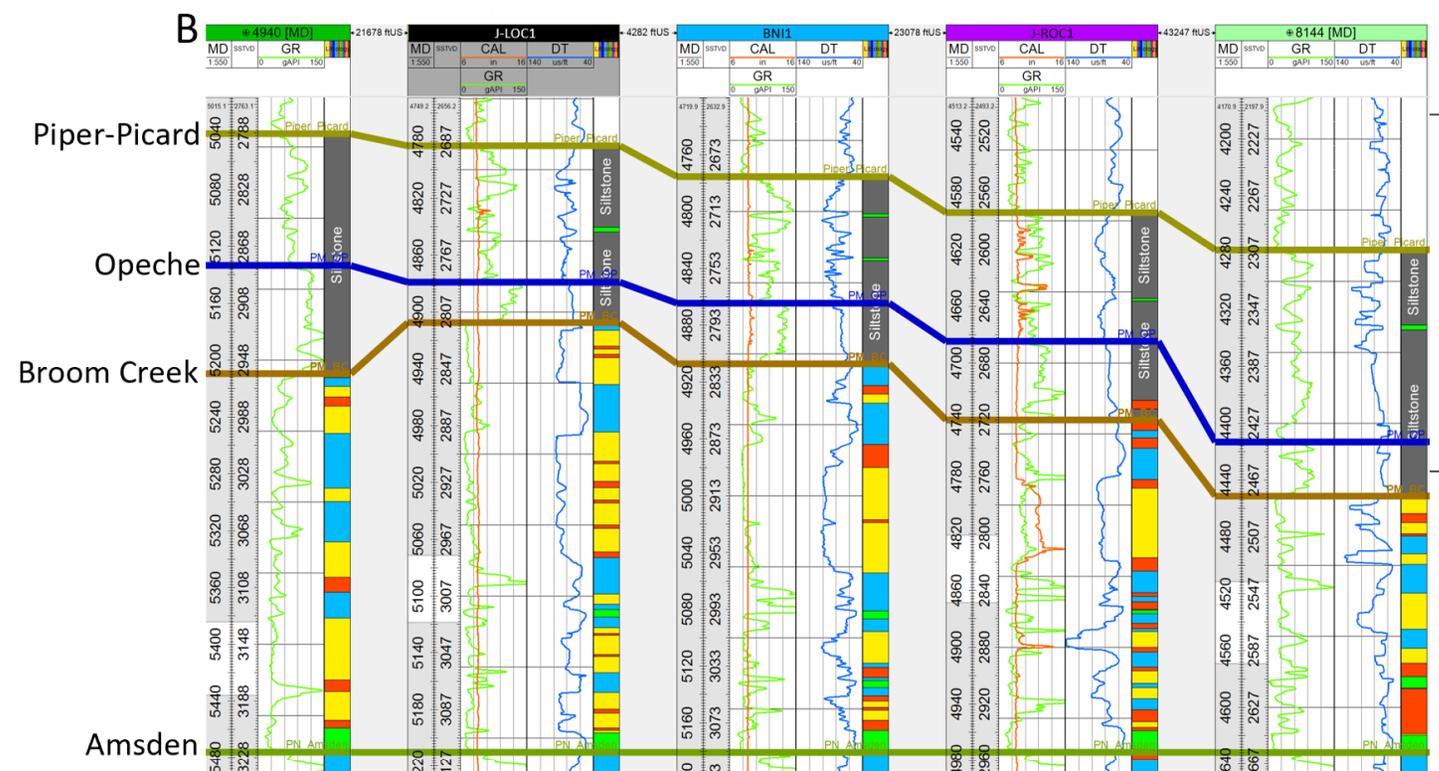
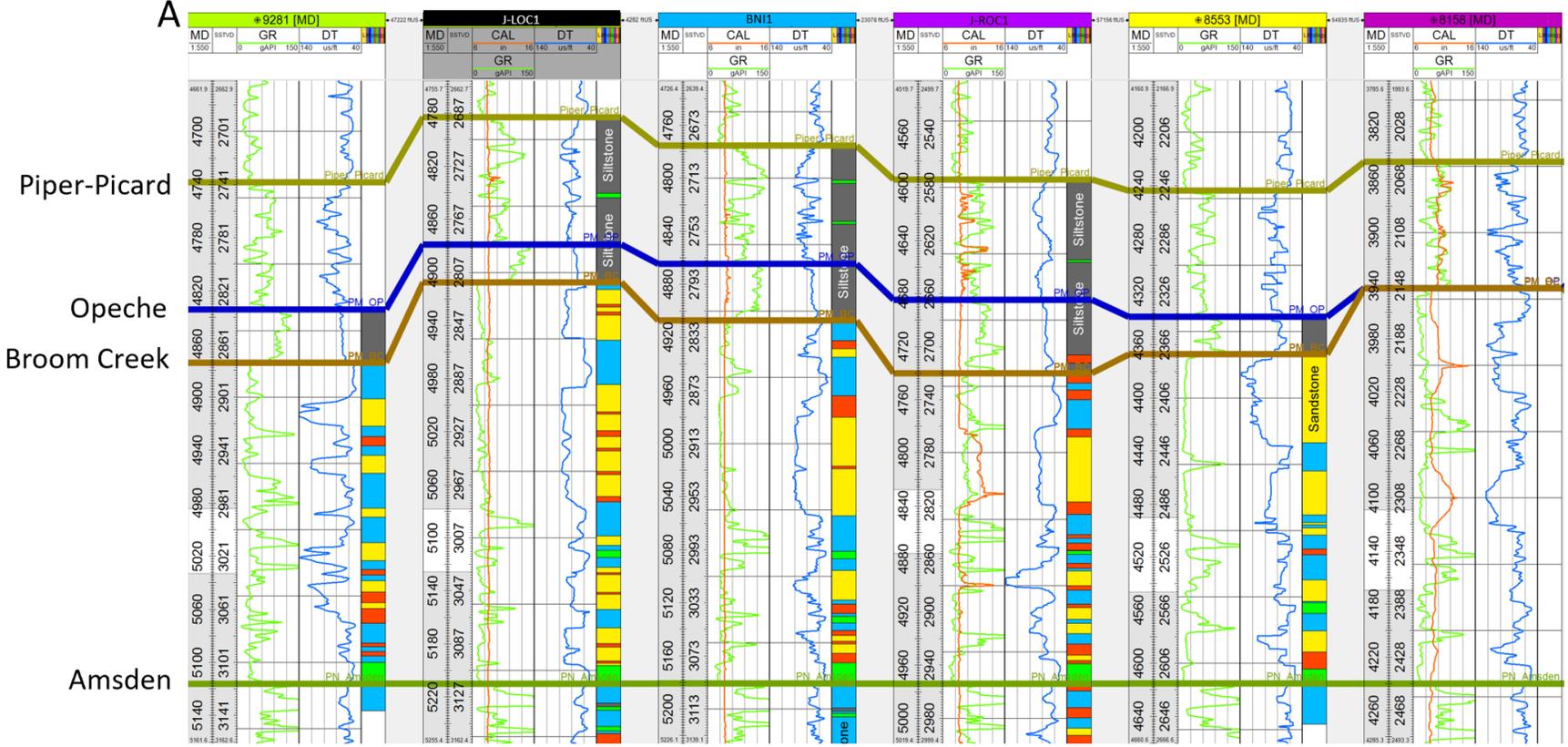

Lawrence Bender

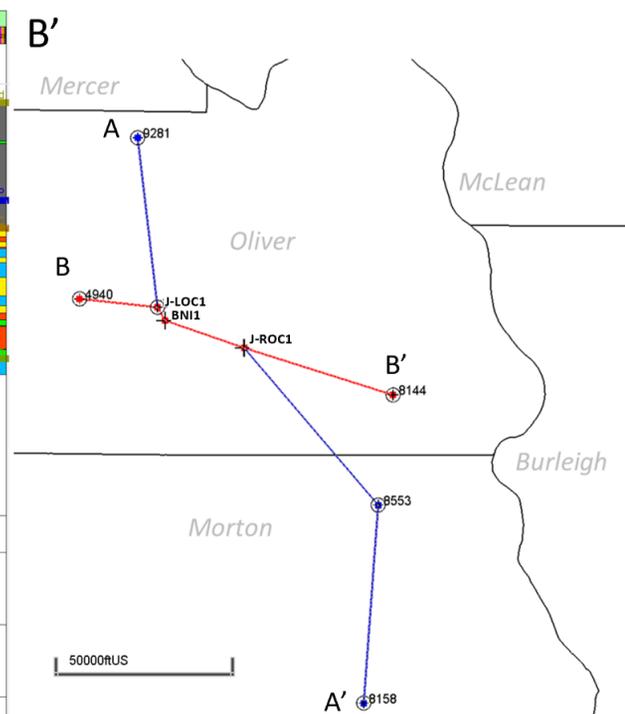
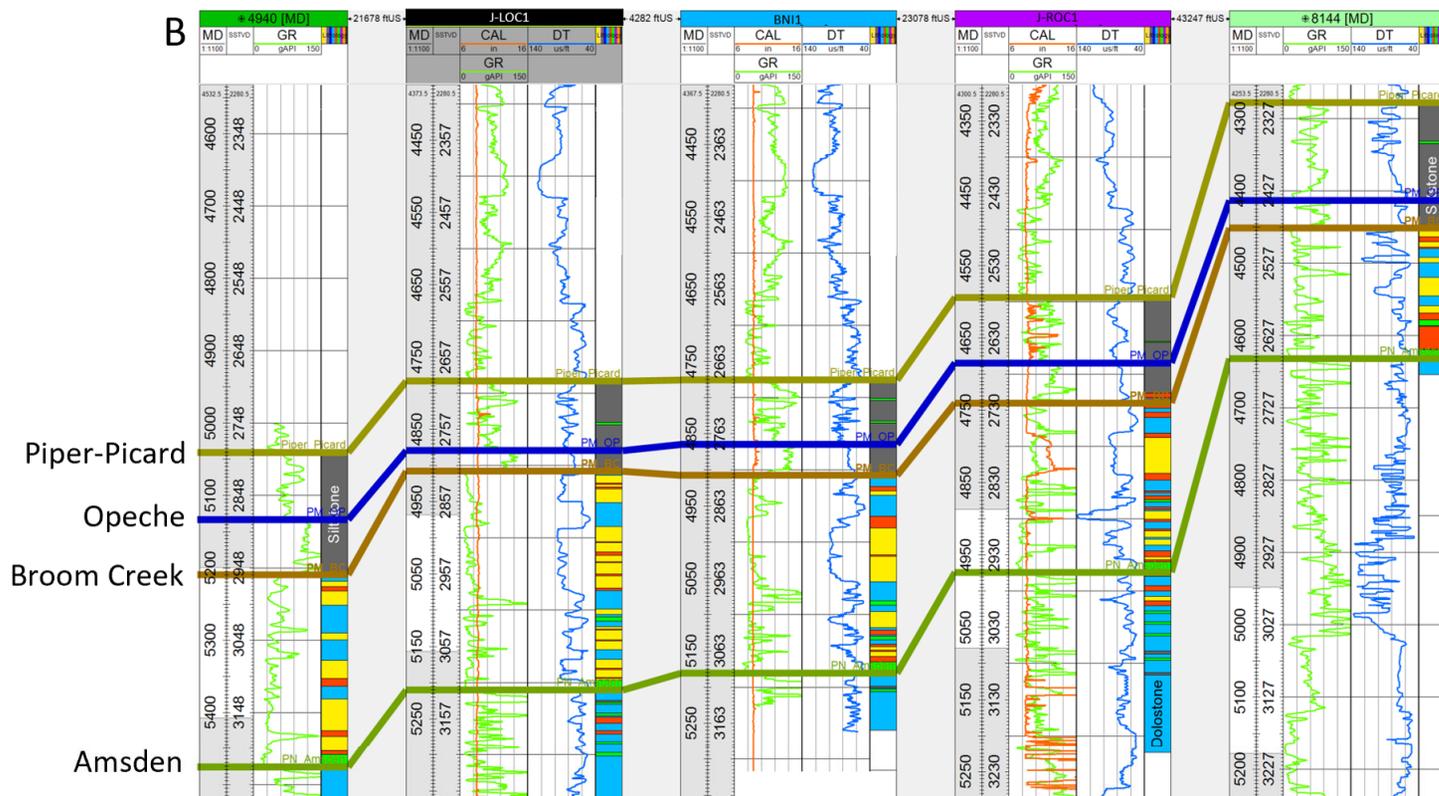
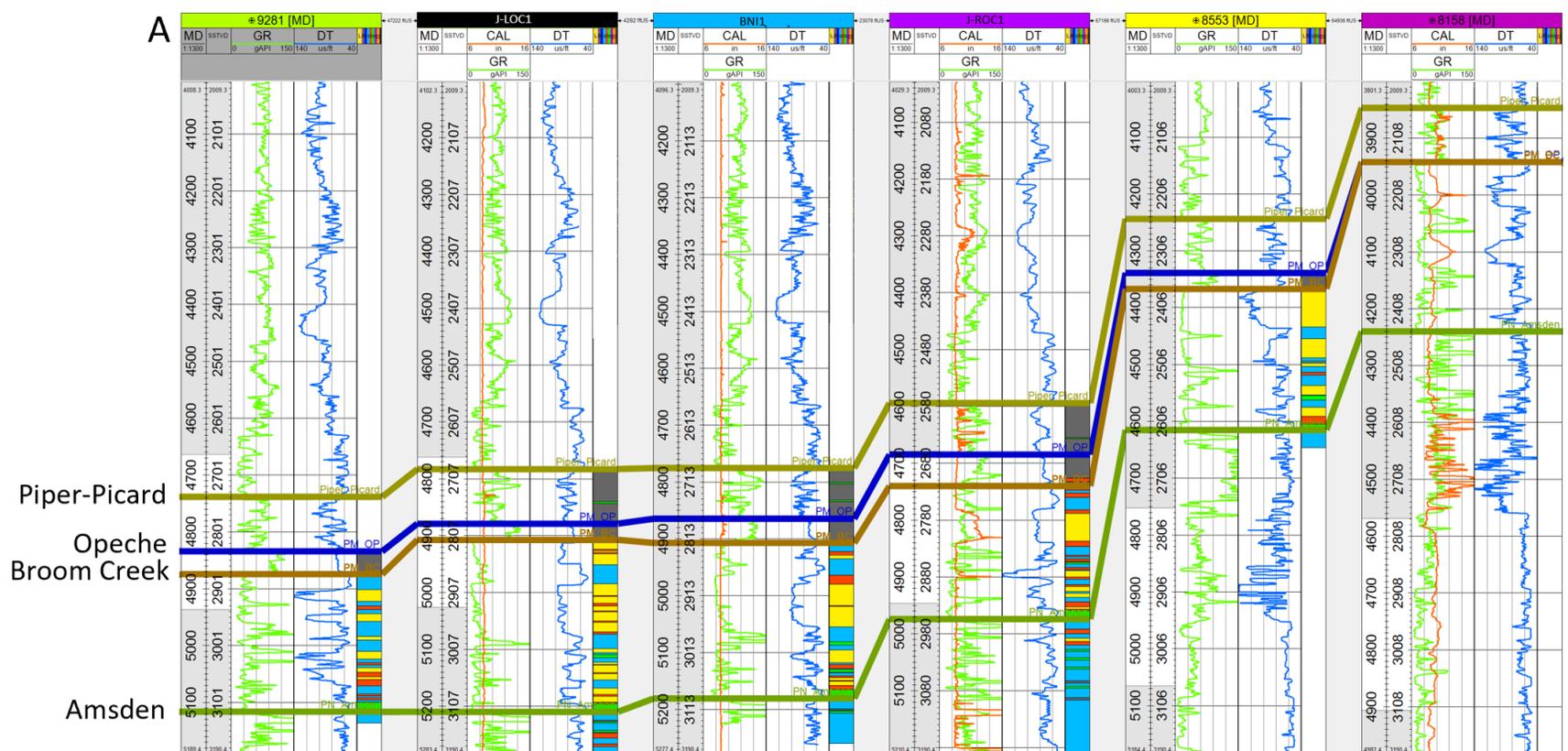
LB/leo

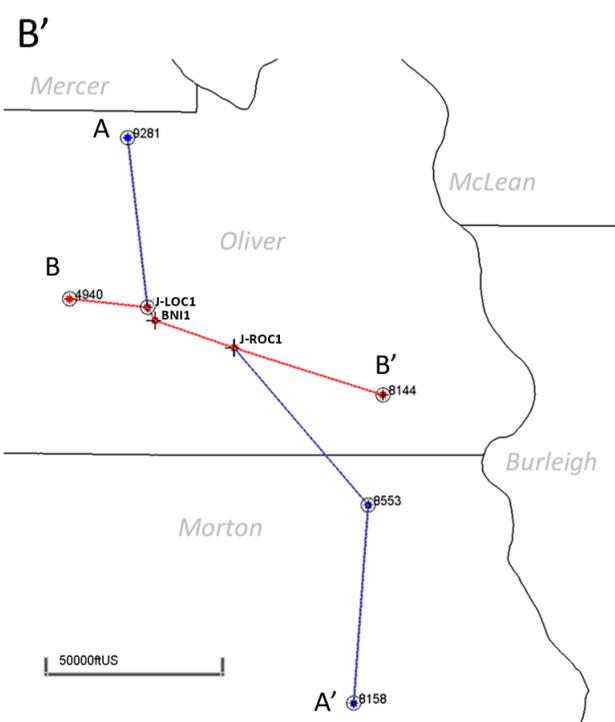
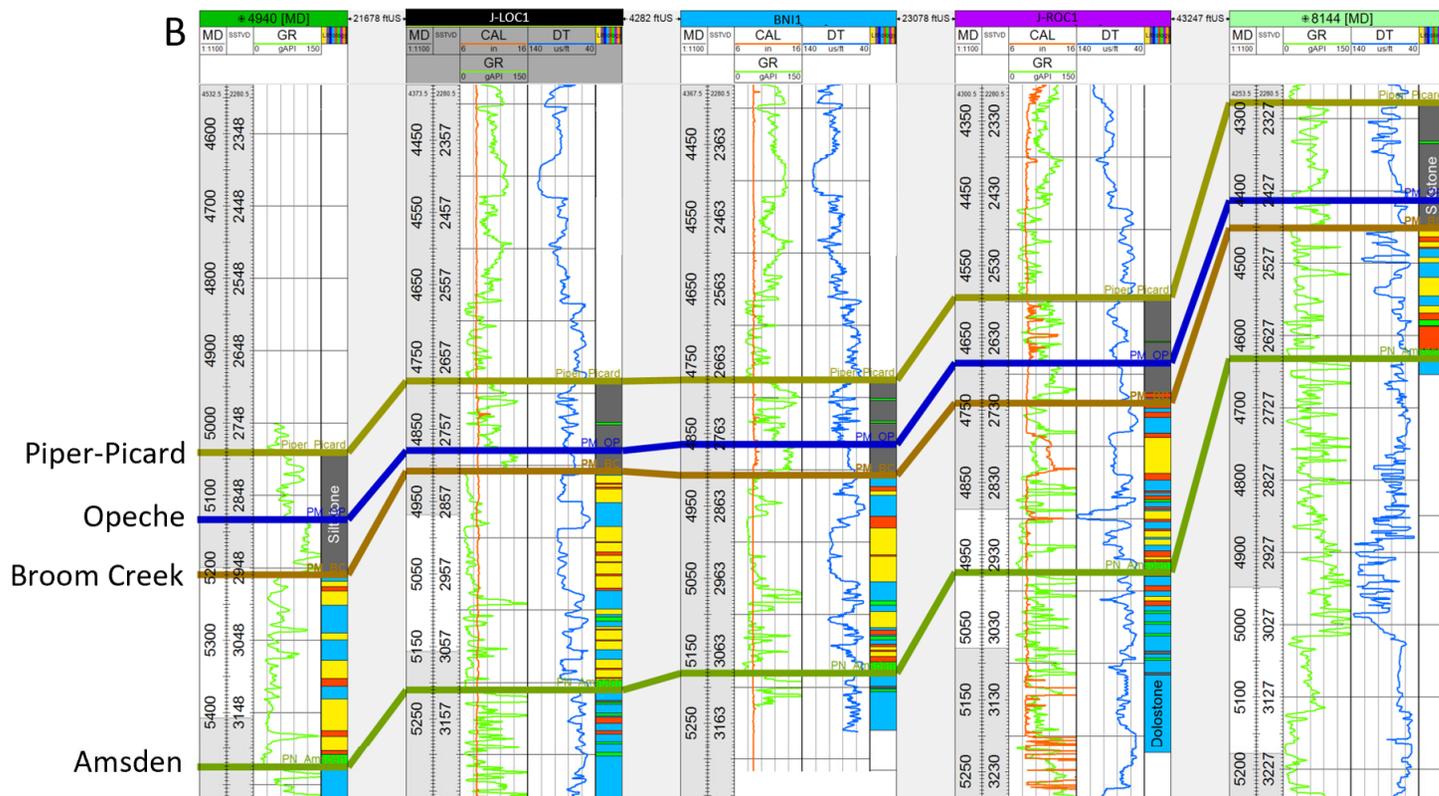
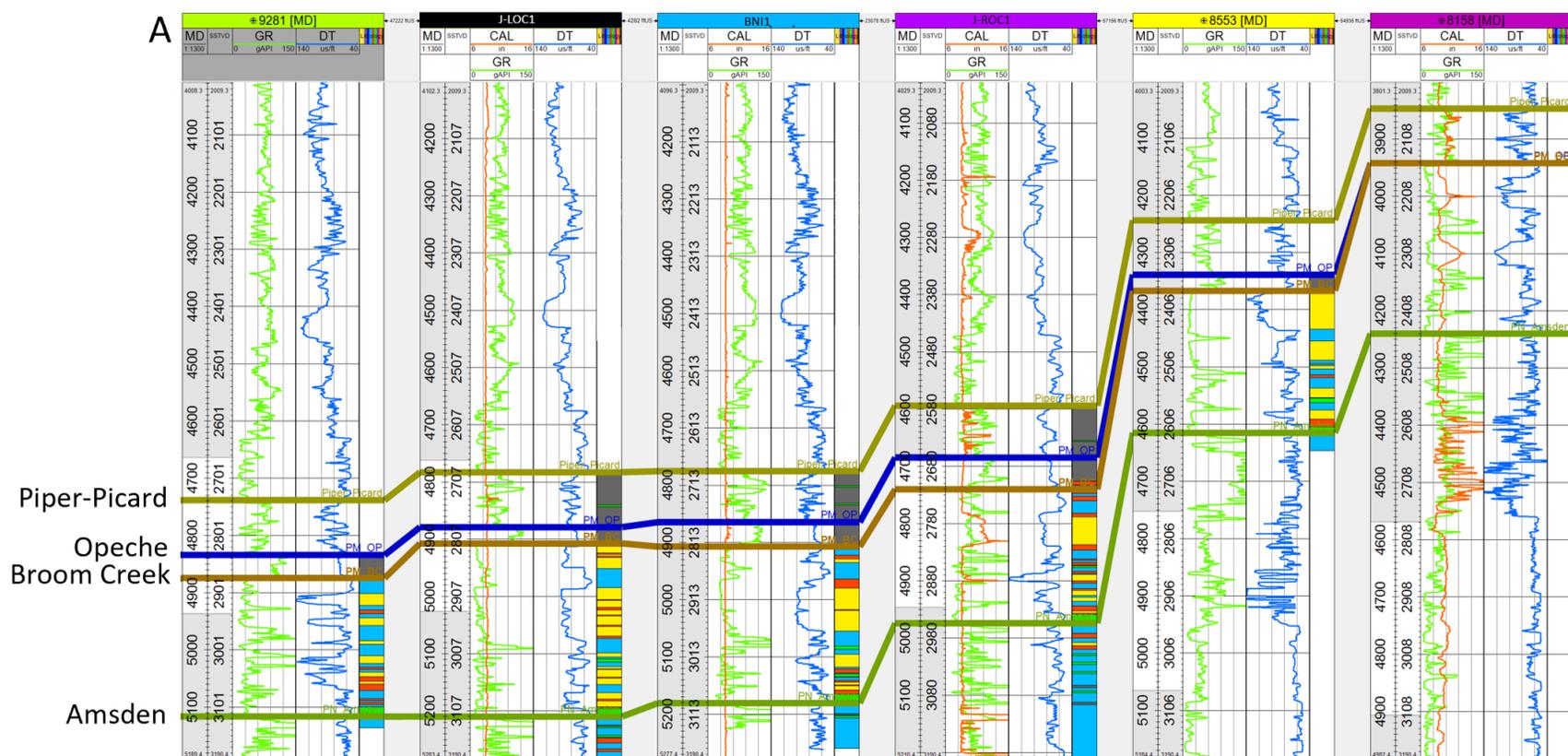
Enclosure

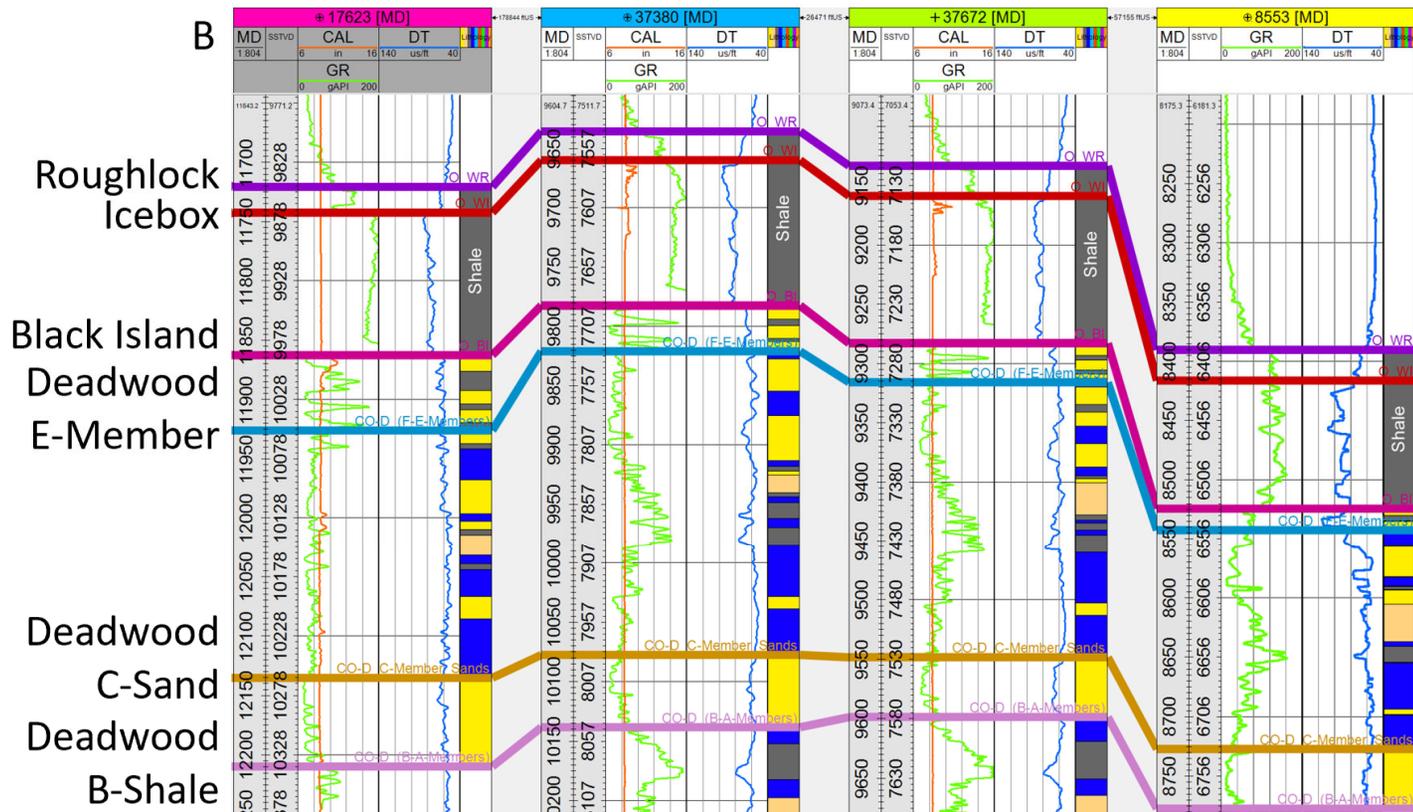
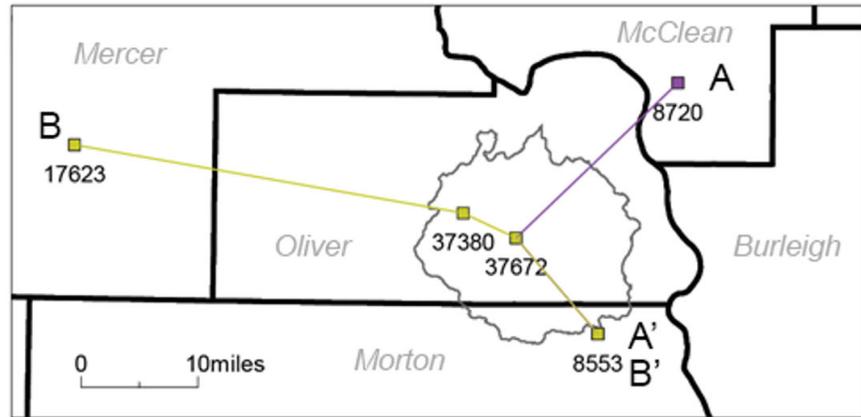
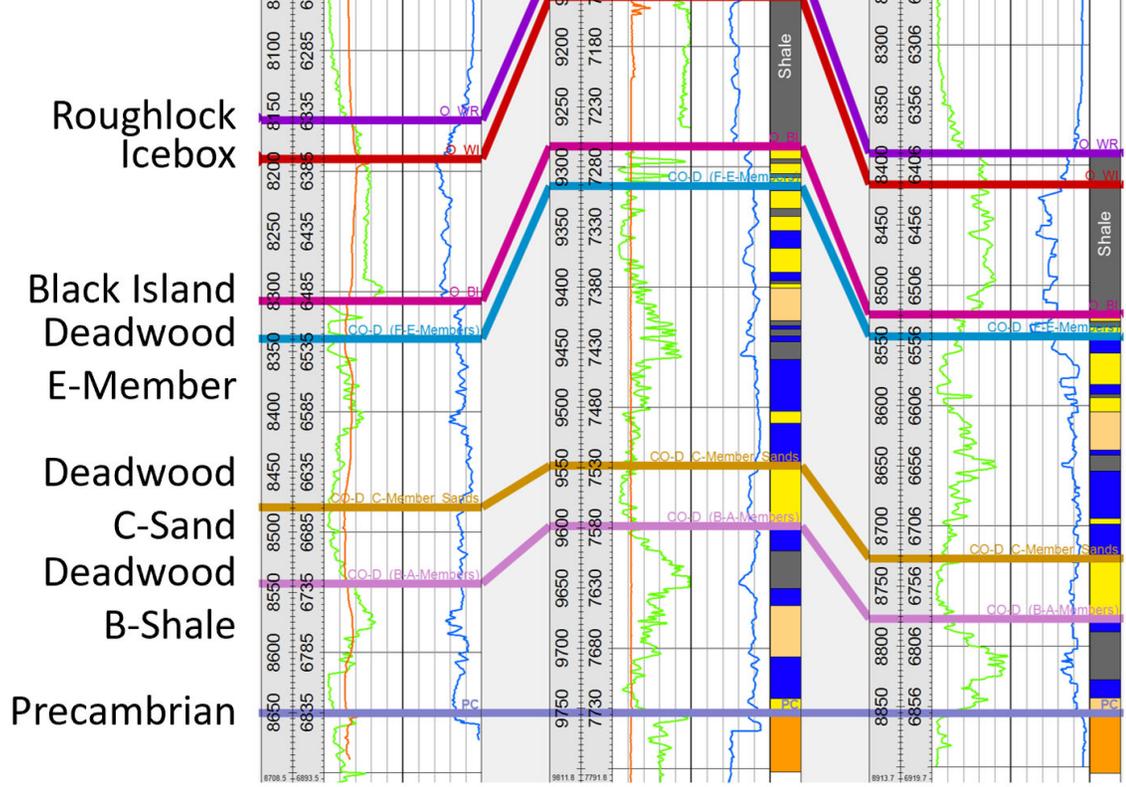
cc: Ms. Shannon Mikula – (w/enc.) *Via Email*

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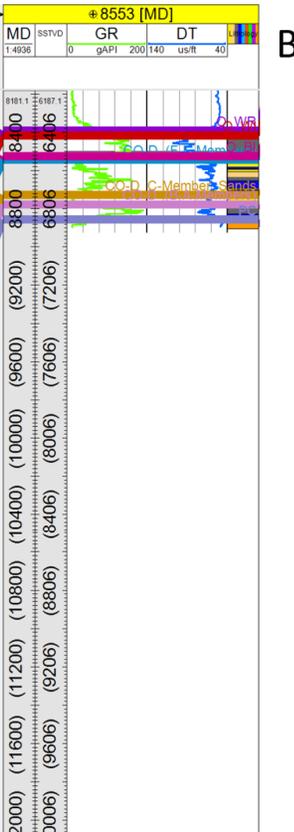
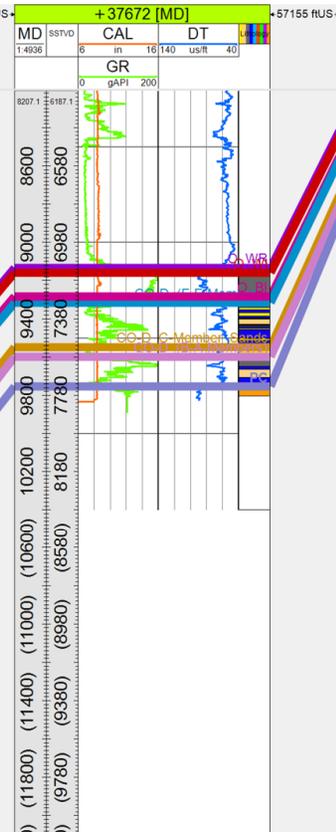
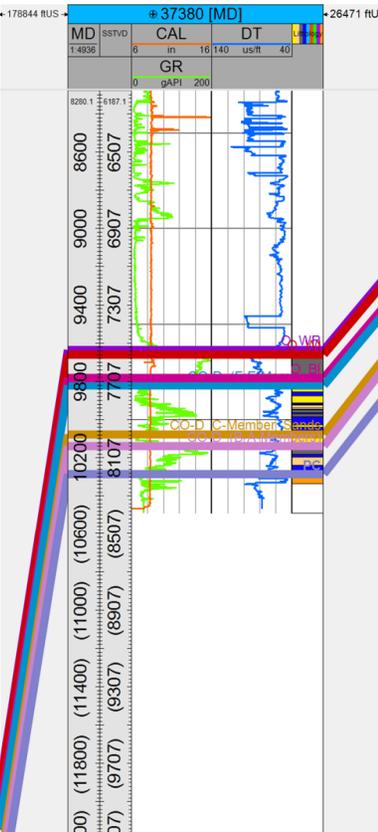
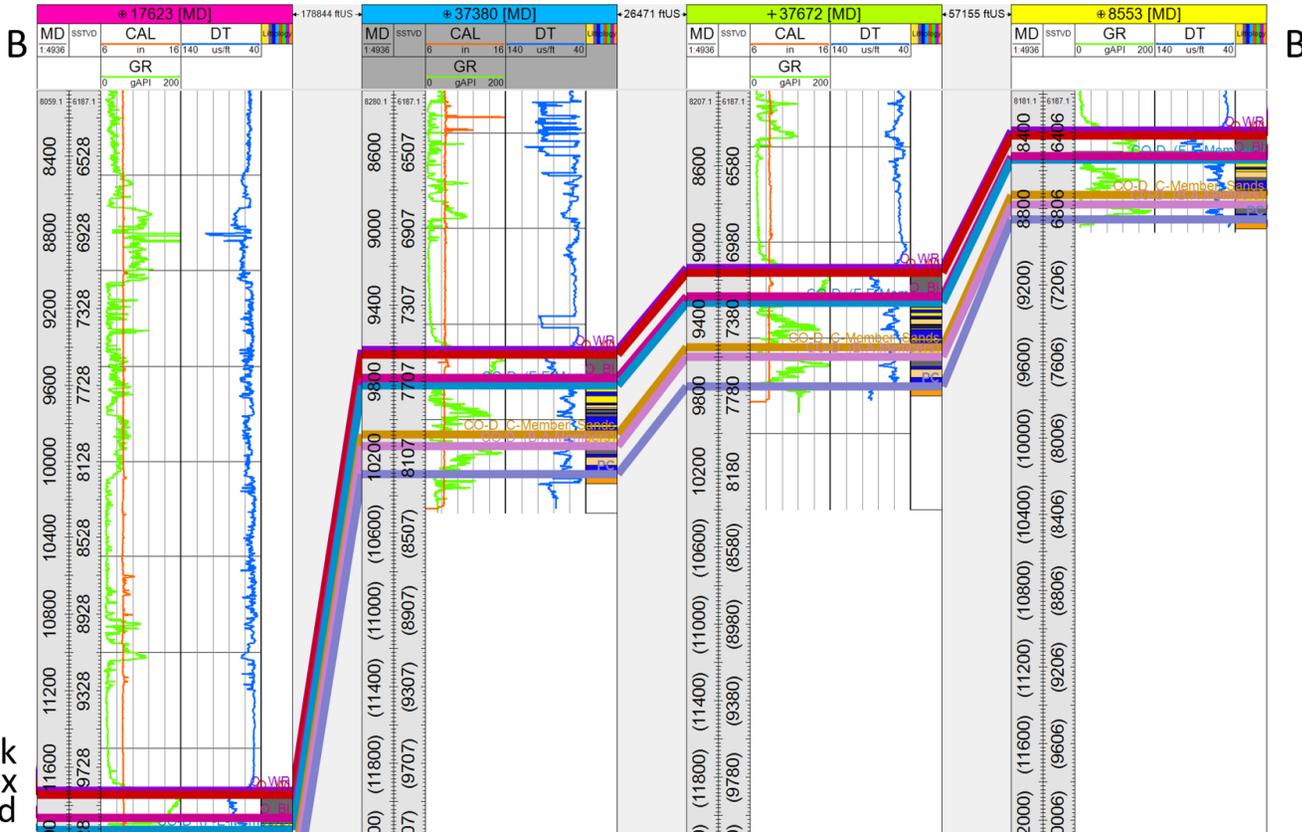
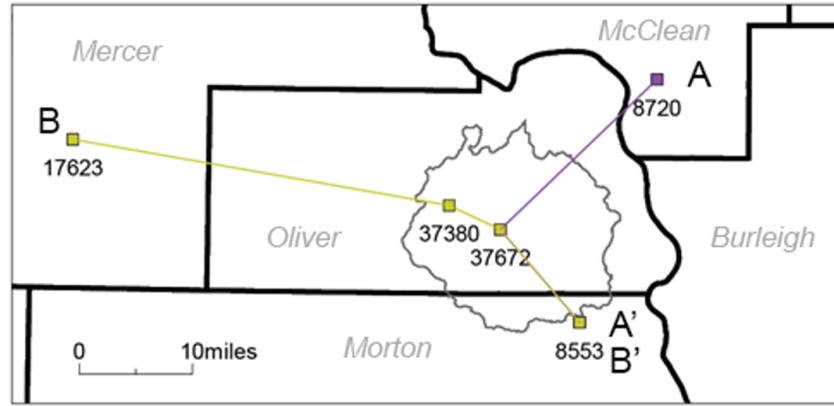
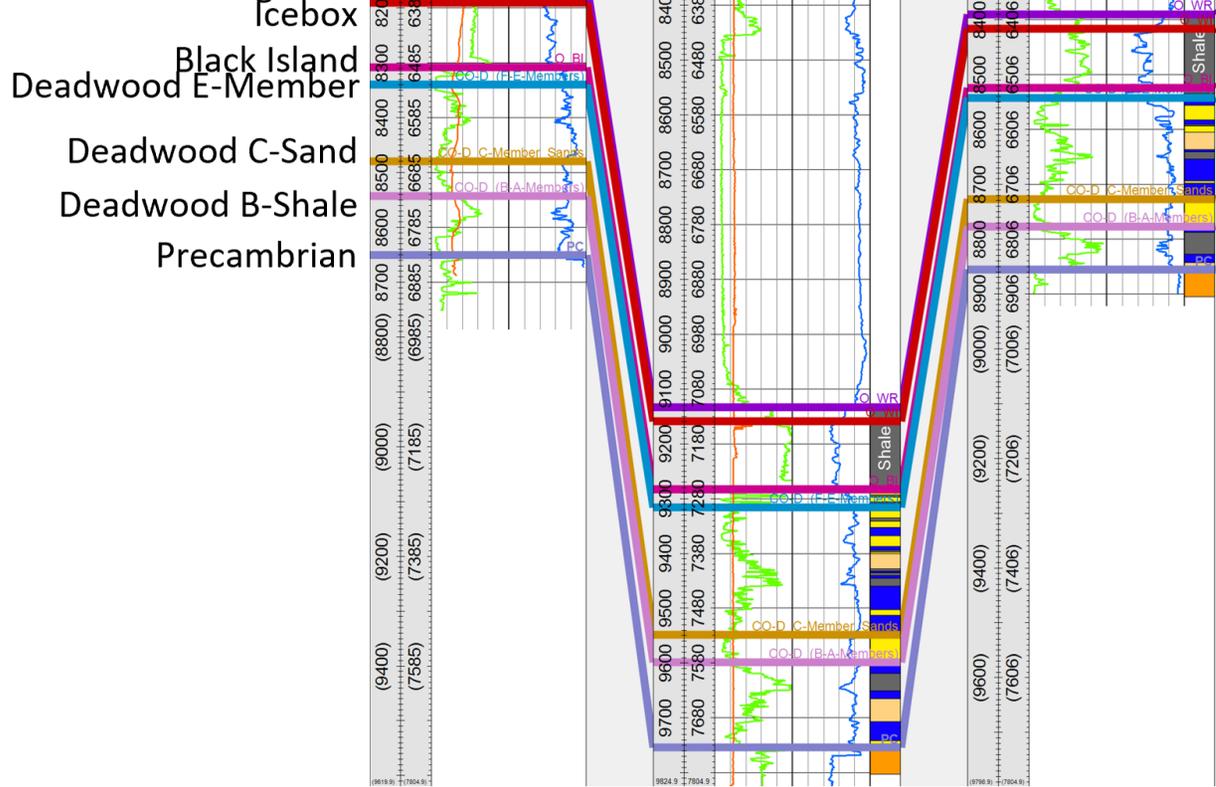


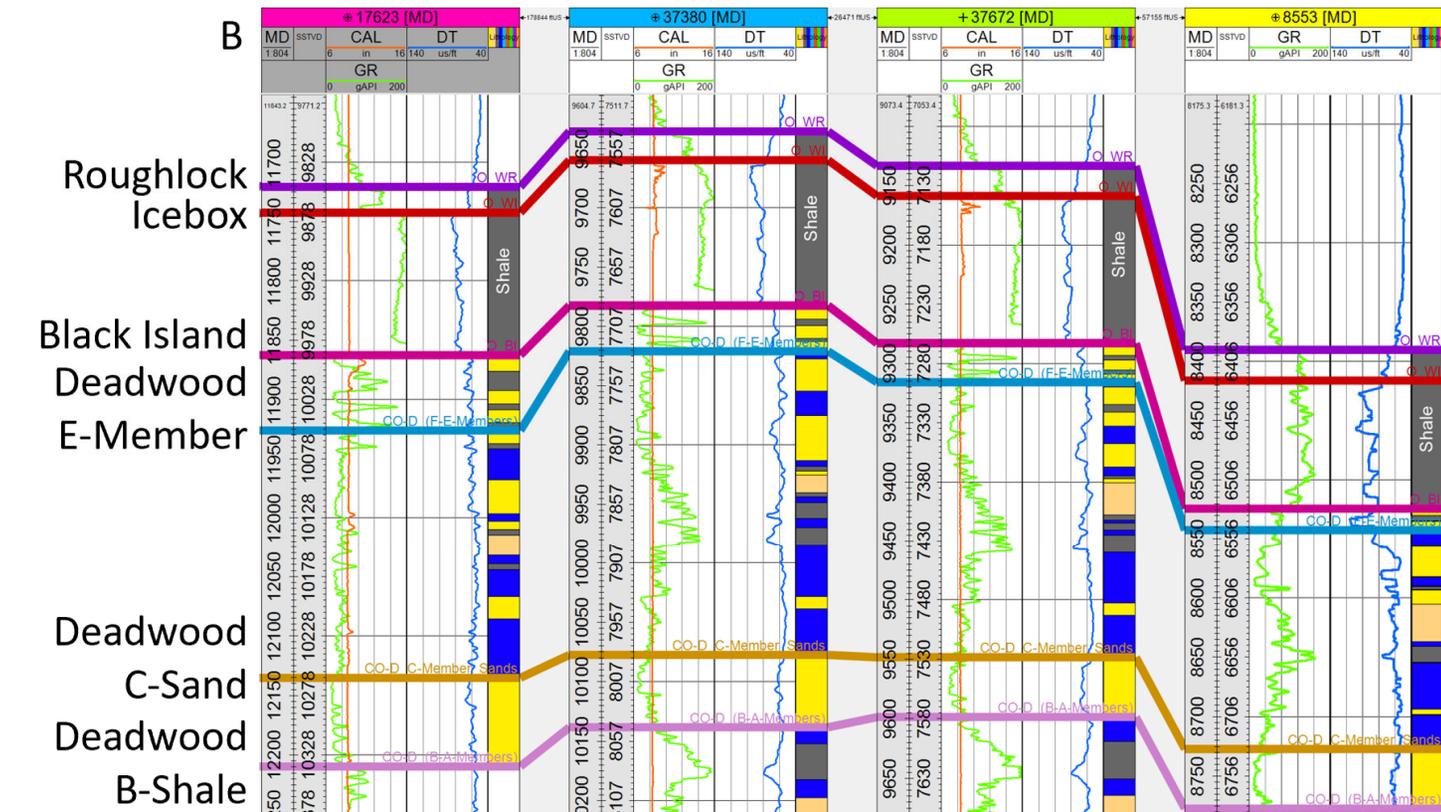
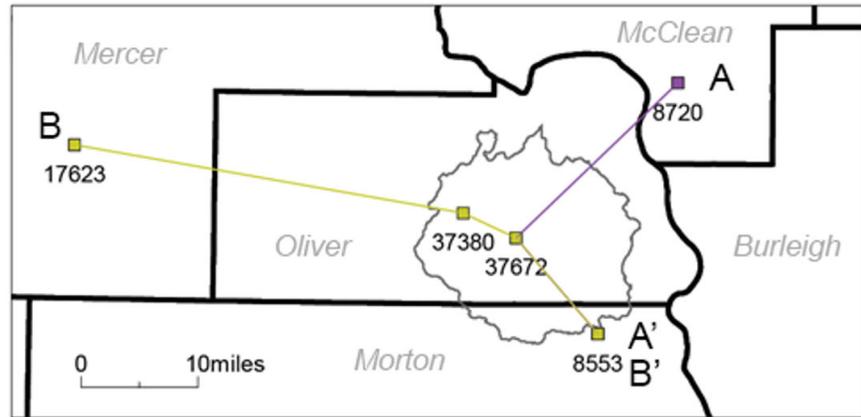
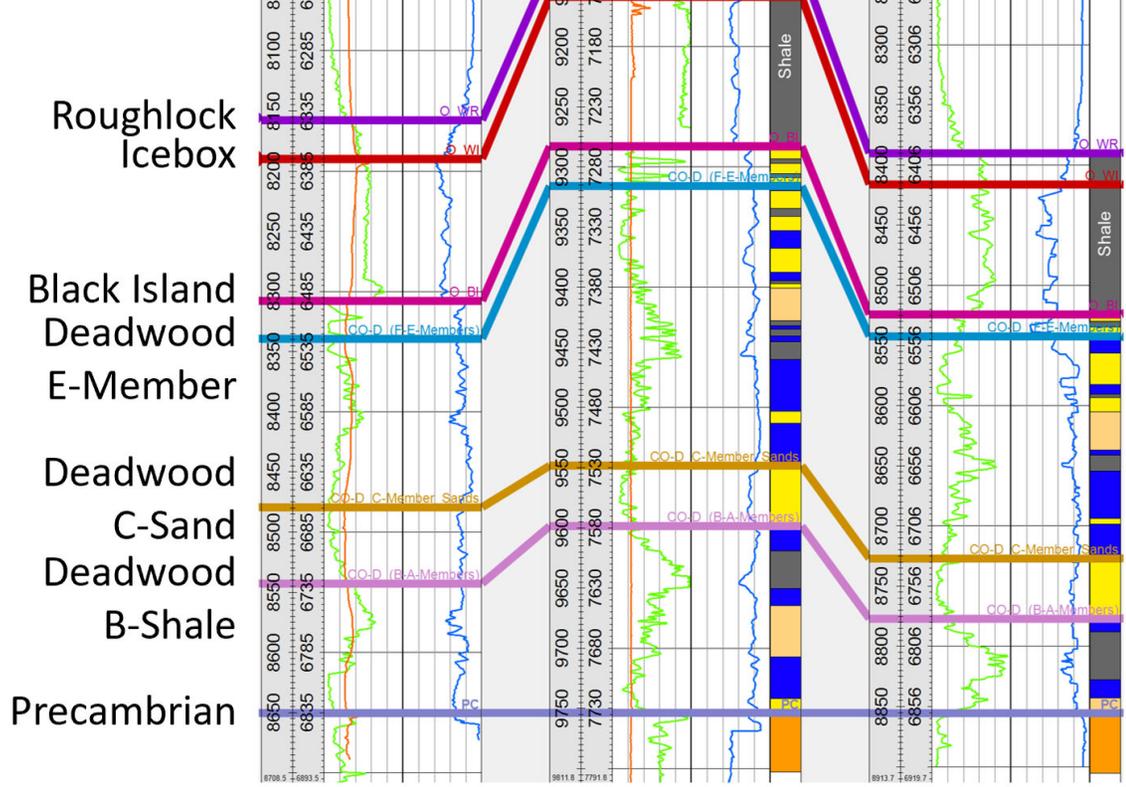






B'





B'

Narrative Summary of Wellbore Instability

It is noted that around 4:30pm on September 22 hook load increased to 27,000lbs, which is indicative of lost buoyancy in the well bore caused by a sudden and severe unintended flow of drilling fluids from the well bore. Additionally, noted is 170 barrels (bbl) flowed in the first 15 minutes following hook load increase and also noted is a reduction in pump rate with 110bbl flowing from the wellbore in the next 15 minutes. The next notation is the administration of the Loss Control Materials (LCM) with no returns noted and the further administrative step of drilling ahead to push the LCM with drill cuttings of 22feet during which an additional 300bbl flowed from the well. At this point pumps were shut down and a flow check was performed. Over the next 5 hours, following administration of LCM and flow check the pumps were shut down and it is reported that it took an additional 496bbbls of mud to replace the continuous, unintentional, and uncontrolled flow of drilling fluids from the well. The next record entry is 30 minutes later, where with no pumps on 110bbl flowed from the well. At this time the decision was made to pull the drilling string out of the hole because of the loss of control over the well and high risk of well collapse or possible kick due to loss of control over well bore pressure from the continuous and uncontrolled fluid flowing from the well.

As the drill string was being pulled from the hole, cement crews were requested to mobilize and Minnkota, along with well site superintendents, were discussing with specialized units at Schlumberger on the best course of activities to perform in an effort to regain well control. Additionally, by 6:00am on September 23, 13 hours following the start of the Well Control Event 1300bbbls had continuously flowed from the well, more than two full well bore volumes of drilling fluid. It is noted that there was a call for delivery of additional drilling fluids to the well site. The engineering reports lead to a singular conclusion: from 4:30 pm on September 22, 2020, the well was “out of control.”

From 4:30pm on September 22 to 4:36pm on September 23, roughly the first 24 hours of the Well Control Event, and reflect that approximately 4,200bbbls of drilling fluid flowed, uncontrolled, from the well. We went through 3 full wellbore volumes of drilling fluid in 24 hours. From 6:00am on September 23 through 8:00pm on September 23, the crew monitored with pumps off until attempting a Gunk Plug as advised by Schlumberger specialized well control. At the time of administering the Gunk Plug it is reported that in addition to the Gunk Plug fluids an additional 142 bbls were replaced. Over the next two hours fluid was recorded as flowing from the well at a rate of over 80bbbls per hour with pumps shut off. Unfortunately, the Gunk Plug had not resulted in regained control over the fluid flowing from the well. Continuing on September 24, it is reported that the cement crew arrived at

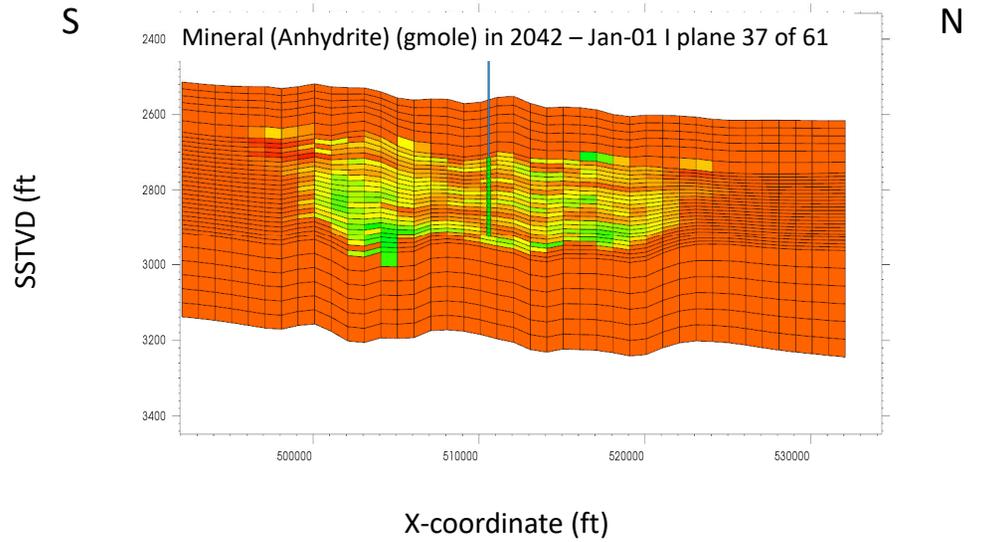
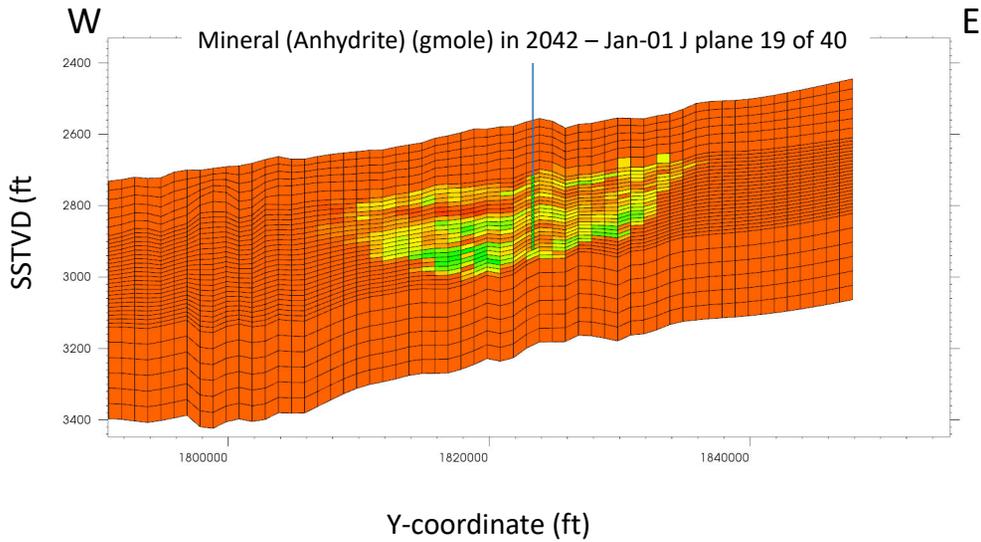
5:30pm and the first cement plug was set on or about 8:00pm. It is reported that at the time the plug is set another 150bbl had flowed from the well and every 5 minutes there after 7bbls flowed from the well, a rate of approximately 84bbl per hour. The well had not been brought under control by the first cement plug. It took three plugs totaling 1500 linear feet of cement to regain temporary control over fluid flowing from the well in order to safely drill ahead on October 5 at or about 1:00am, however, it is reported that the well still had an uncontrolled flow of fluids at a rate of 50bbl per hour.

Unfortunately, the temporary control only lasted until October 7, 2020 on or about 9:00pm when it is noted that 200bbls of drilling fluid flowed from the well. Ultimately it took 2500 linear feet of cement to regain sufficient control over fluid flowing from the wellbore to complete the testing, coring and logging necessary to support the intent and goals for the J-ROC 1 well. The J-ROC failed to entirely complete the program because Minnkota decided to abandon two thirds of the planned test program because of the well instability caused by the continuous and uncontrolled flow of fluids. Further, it was reported that the J-ROC 1 required approximately 13,900bbls of replacement fluids because of the flow of drilling fluid from the well in the subsurface.

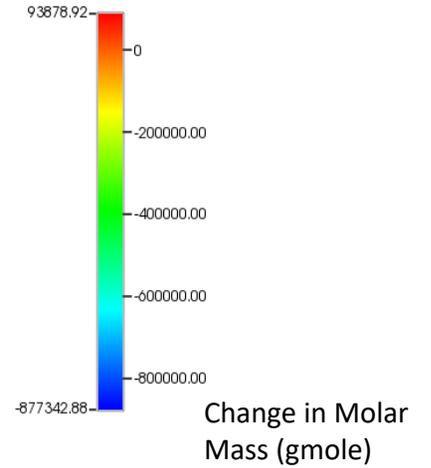
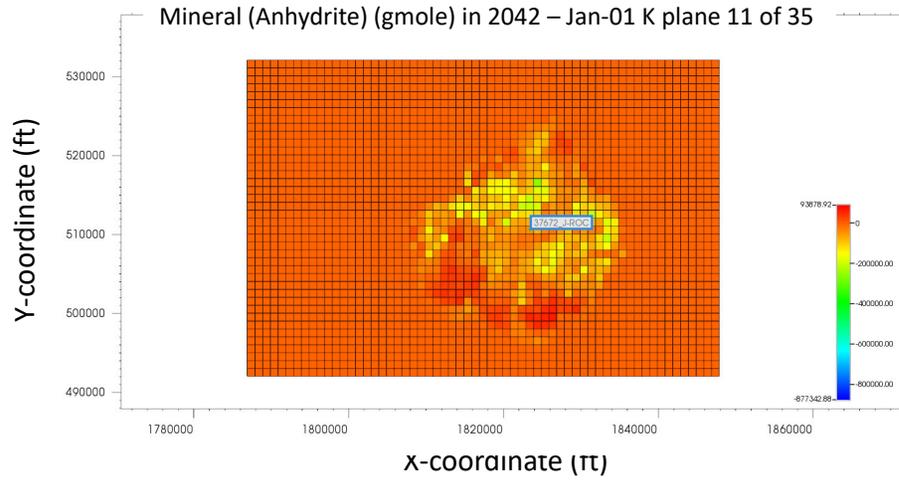
Proposed Logging Program J-ROC 1 (Liberty-1)

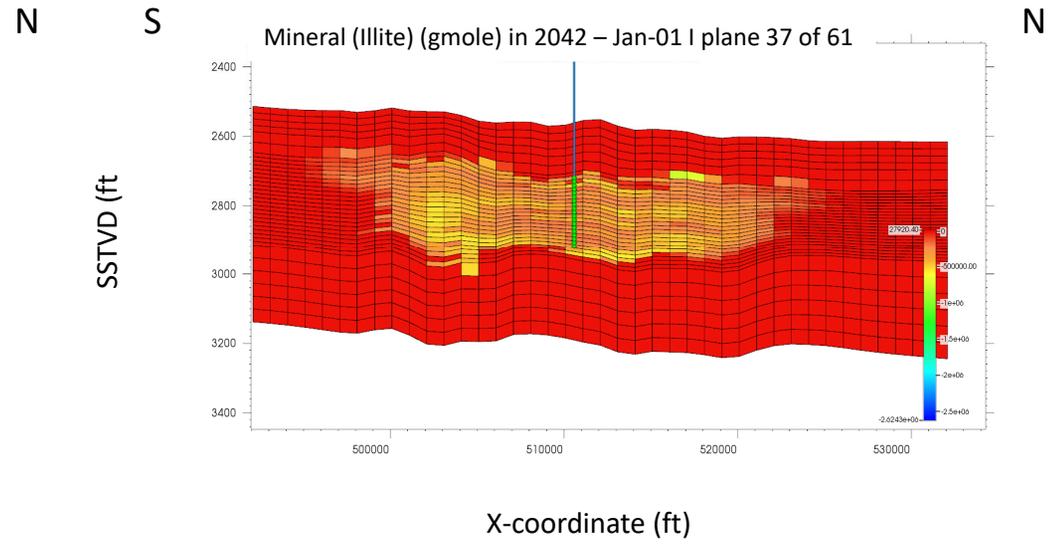
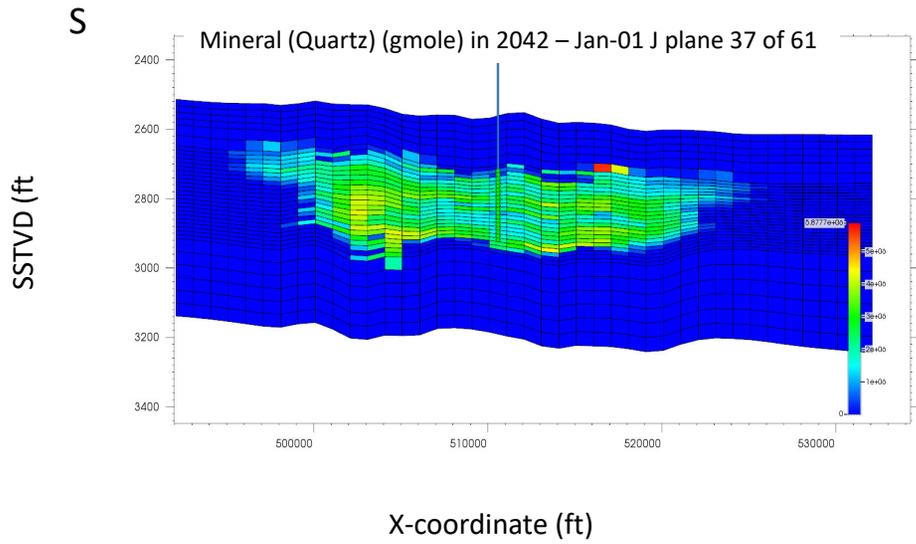
Logging Program

Section	Type	Depths (ft)
17 1/2 in Hole	N/A Cased Hole: CBL/VDL	0-2000
12 1/4 in Hole	Open Hole: Gamma Ray 5 Fluid Samples Cased Hole: CBL-VDL-Ultrasonic Casing Inspection log - Through Tubing Active Pulse Neutron - Through Tubing Temperature - Calibration DTS	0-5400 by Log 0-5400 0-5400 3400-5400 0-5400

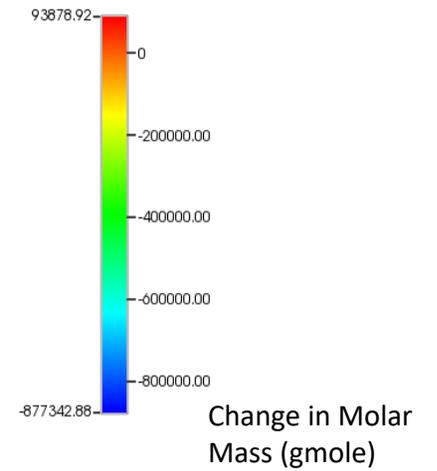


BC5 – molar mass
dissolution/distribution
for anhydrite





molar mass
dissolution/distribution
for Quartz and Illite (to correct the title in the report for 2042)



Kadrmass, Bethany R.

From: Kadrmass, Bethany R.
Sent: Monday, November 29, 2021 3:48 PM
To: Bender, Lawrence
Cc: Entzi-Odden, Lyn
Subject: Minnkota Power CO2

Lawrence,

After reviewing Minnkota's supplement filings, Commission staff requests the following corrections or additions, referenced by document number when available:

BC4: Correction of all figure 2-12a and 2-12b cross sections to SSTVD

BC5: Molar mass dissolution/distribution for anhydrite as previously submitted, at the end of simulation.

BC7: Correction of cross sections to SSTVD.

J-ROC 1 1 - FMI log has not been received.

J-ROC 1 1 - Clarification on which logs will be attempted on re-entry. Add information on hole stability and why MDT wasn't run.

DW4: Correction of figure 2-12a A-A' to SSTVD, figure 2-12b both cross sections to SSTVD and in a higher resolution.

DW11: Correction of figure 3-5 to SSTVD and in a higher resolution

Thank you,

Bethany Kadrmass

Legal Assistant, Oil and Gas Division

701.328.8020 • brkadrmass@nd.gov • www.dmr.nd.gov



600 E Boulevard Ave, Dept. 405 • Bismarck, ND 58505

Kadrmass, Bethany R.

From: Entzi-Odden, Lyn <lodden@fredlaw.com>
Sent: Tuesday, November 16, 2021 4:41 PM
To: Kadrmass, Bethany R.
Cc: Shannon Mikula; Bender, Lawrence; Meidinger, Lorna B.; wdpeterson@nd.gov; Clark, Andrew
Subject: Letter RE Minnkota and SHPO
Attachments: Minnkota B Kadrmass letter.pdf

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Bethany,

Please see the letter.

Thank you.



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November 16, 2021

Ms. Bethany Kadrmas
Oil and Gas Division
ND Dept of Mineral Resources
600 E Boulevard Ave, Dept. 405
Bismarck, ND 58505

**RE: Cases 29029, 29030, 29031, 29032,
29033, 29034
ND SHPO Ref.: 21-0571
Minnkota Power Cooperative, Inc.**

Dear Ms. Kadrmas:

Minnkota Power Cooperative, Inc. ("Minnkota") discussed with the State Historical Society of North Dakota ("SHSND") regarding the comment letter dated October 22, 2021 from the State Historic Preservation Officer ("SHPO"). Minnkota understands that SHSND has conducted a Class 1 background/records review and determined that additional information is required for their determination of effects, and that this forms the basis for the recommendation of performing a Class III pedestrian survey in the area planned to be disturbed for the purpose of installing the proposed monitoring well for the Project Tundra storage facility.

Minnkota provided to SHPO survey plats of the well pad and the access road which are located in the North Half Southeast Quarter (N/2SE/4) of Section 34, Township 142 North, Range 83 West, Oliver County, North Dakota. Minnkota and SHPO agree (see the attached letter from SHPO) that a Class III pedestrian survey will be completed on the Southeast Quarter (SE/4) of Section 34 and report will be shared with the SHPO for their evaluation of effects. Minnkota agrees to take the activity of performing a Class III pedestrian survey and SHPO issuance of a determination of effect, prior to commencing construction on the well pad, as a condition precedent of the drilling permit for the NRDT Monitoring well, which is currently pending before the Division of Mineral Resources and North Dakota Industrial Commission. The SHPO and Minnkota agree that the scope for the performance of the Class III pedestrian survey to be the greater of (1) the area to be disturbed plus a 100 ft buffer around the disturbance area (including well pad, stockpile, and access), or (2) 20 acres radially-centered from the wellhead and 175 ft

Ms. Bethany Kadrmas
November 16, 2021
Page 2

from center of the access road and stock pile location located within the North Half of the Southeast Quarter (N/2SE/4) of Section 34.

Thank you for the opportunity to provide response to the recommendation from the SHSND. If you have any questions please contact the undersigned or Lorna Meidinger, Historic Preservation Specialist, at (701)328-2089 or lbmeidinger@nd.gov.

Sincerely,

/s/ Lawrence Bender
LAWRENCE BENDER

LB/leo

Enclosure

cc: Lorna Meidinger – (w/enc.) *Via Email*
William D. Peterson – (w/enc.) *Via Email*
Andrew Clark – (w/enc.) *Via Email*
Shannon Mikula – (w/enc.) *Via Email*

74474568.1



November 15, 2021

Ms. Shannon R. Mikula
Special Projects Counsel and Geologic Storage Lead
Minnkota Power Cooperative
5301 32nd Ave. S.
Grand Forks, ND 58201

ND SHPO Ref.: 21-0571 Minnkota Power Cooperative, Inc Cases 29029, 29030, 29031, 29032, 29033, 29034 in portions of 30 Sections in Oliver County, North Dakota

Dear Ms. Mikula,

We recently met to clarify details under ND SHPO Ref.: 21- 0571 Minnkota Power Cooperative, Inc Cases 29029, 29030, 29031, 29032, 29033, 29034. We recommend a Class III (pedestrian survey) of archaeological resources in the project area to include the new access road, stockpile locations, and well pad area for the proposed monitoring well in the north half of the Southeast Quarter of T142N R83W Section 34. These proposed areas of disturbance plus a buffer area of 100 feet surrounding the disturbance or 20acres radially-centered from the wellhead and 175ft from center of the access road and stock pile, whichever is greater, is what should be surveyed.

We do not object to a conditional permit approval that includes the above survey requirement and consultation for any cultural resources occurs prior to construction beginning in the area.

Thank you for the opportunity to review this project. If you have any questions please contact Lorna Meidinger, Historic Preservation Specialist at (701) 328-2089 or lbmeidinger@nd.gov

Sincerely,


for William D. Peterson PhD

State Historic Preservation Officer
(North Dakota)

21-0571

Kadrmass, Bethany R.

From: Entzi-Odden, Lyn <lodden@fredlaw.com>
Sent: Tuesday, November 16, 2021 2:23 PM
To: Kadrmass, Bethany R.
Cc: Bender, Lawrence; Shannon Mikula
Subject: Minnkota Supplemental Filing
Attachments: Minnkota letter.pdf

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Bethany,

Please see the attached letter and the link below with regard to Minnkota’s supplemental information as requested in follow-up to the November 2, 2021 NDIC hearing.

Thank you.



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November 16, 2021

Ms. Bethany Kadrmas
Oil and Gas Division
ND Dept of Mineral Resources
600 E Boulevard Ave, Dept. 405
Bismarck, ND 58505

**RE: Cases 29029, 29030, 29031, 29032,
29033, 29034
Supplements Requested at Hearing
on November 2, 2021
Minnkota Power Cooperative, Inc.**

Dear Ms. Kadrmas:

On behalf of Minnkota Power Cooperative, Inc. (“Minnkota”) we respectfully submit the supplements requested by the North Dakota Industrial Commission (“Commission”) for the above-captioned matters. For the Commission’s convenience, Minnkota has developed a “Supplemental List” which identifies the supplement and cross-references to the pending applications.

In regard to appendix H 1.11., in my opinion, there should not be any need to revise any other terms or conditions in the storage agreement. There should not be any additional revision since revising the definition in the storage agreement simply enhances the already agreed upon Pore Space Lease. First, the geographic extent of the Deadwood and the Broom Creek storage facilities is identical as we have established the same boundary for both storage facilities, the stacked storage concept provide basis for this commonality in boundary and operation. Second, the Pore Space Lease is referenced and incorporated as material terms of the Storage Agreement by subsection 2.1.4. Within the Pore Space Lease, with Section 2 granting clause and Section 6 Amalgamation it is my opinion that the underlined portions of this Lease provide latitude and are express consent from the Lessors to create, modify and establish amalgamated units of any size and shape and depth upon Commission approval. Ratification would not be necessary in this instance because each lessor has provided latitude to the Lessee for purposes of amalgamation conditioned upon Commission order.

Those sections provide as follows:

2. LEASE RIGHTS. In consideration of the compensation, covenants, agreements, and conditions set forth in this Lease, Lessor grants, demises, leases and lets to Lessee the exclusive right to use all Pore Space, Reservoirs and their Formations in the Leased Premises for any purpose not previously granted or reserved by an instrument of record related to the capture, injection, storage, sequestration, sale, withdrawal or disposal of Carbon Dioxide, Non-Native Carbon Dioxide and incidental associated substances, fluids, and minerals, provided that Lessee shall have no right to use potable water from within the Leased Premises in Operations;

* * *

6. AMALGAMATION. (a) Lessee, in its sole discretion, shall have the right and power, at any time (including both before and after Commencement of Operations), to pool, unitize, or amalgamate any Reservoir or portion of a Reservoir with any other lands or interests into which that Reservoir extends and document such unit in accordance with applicable law or agency order. Amalgamated units shall be of such shape and dimensions as Lessee may elect and as are approved by the Commission. Amalgamated areas may include, but are not required to include, land upon which injection or extraction wells have been completed or upon which the injection and/or withdrawal of Carbon Dioxide and Non-Native Carbon Dioxide has commenced prior to the effective date of amalgamation. In exercising its amalgamation rights under this Lease and if required by law, Lessee shall record or cause to be recorded a copy of the Commission's amalgamation order or other notice thereof in the county in which the amalgamated unit. Amalgamating in one or more instances shall, if approved by the Commission, not exhaust the rights of Lessee to amalgamate Reservoirs or portions of Reservoirs into other amalgamation areas, and Lessee shall have the recurring right to revise any amalgamated area formed under this Lease by expansion or contraction or both. Lessee may dissolve any amalgamated area at any time and document such dissolution by recording an instrument in accordance with applicable law or agency order.

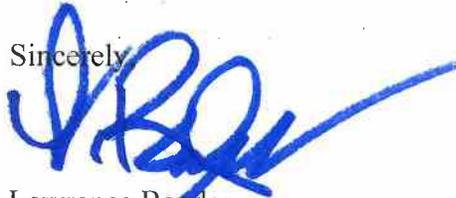
Lessee shall have the right to negotiate, on behalf of and as agent for Lessor, any unit agreements and operating agreements with respect to the operation of any amalgamated areas formed under this Lease. (b) The injection and/or withdrawal of Carbon Dioxide and Non-Native Carbon Dioxide into a Reservoir from any

Ms. Bethany Kadrmas
November 16, 2021
Page 3

property within a amalgamated area that includes the Leased Premises shall be treated as if Operations were occurring on the Leased Premises, except that the royalty payable to Lessor under Section 5(b) of this Lease shall be Lessor's per net acre proportionate share of the total Storage Fee for the preceding Operating year's injection of Carbon Dioxide into the amalgamated area.

Should you have any questions, please advise.

Sincerely,



Lawrence Bander

LB/leo

Enclosure

cc: Ms. Shannon Mikula – (w/enc.) *Via Email*
74464564.1

Doc#	Broom Creek Supplement	Location in Application
BC1	Surface facilities	p. 2-3 Figure 2-2
BC2	Update caption for Figure 2-65 to include the rock type tested (1:25 on hearing)	p. 2-85 Figure 2-65
BC3	Provide the index of additional well tops used to modify (add wells to map)	p. 2-16 Figure 2-9
BC4	Provide higher resolution of figures	p. 2-19 Figures 2-12a and 2-12b, Figures 2-19** and 2-20
BC5	Provide molar mass dissolution/distribution for anhydrite	p. 2-38 and 2-39 Figures 2-27 and 2-28
BC6	Make groundwater well symbols easier to distinguish from one another and add springs	p. 3-4 Figure 3-3
BC7	Provide higher resolution of figures	p. 3-6 Figures 3-5 and 3-6**
BC8	Correct table springs	p. 3-7 Table 3-1
BC9	Herbert Dresser well revise to include the Amsden tops	p. 3-14 Figure 3-8
BC10	Confirm what “regulatory monitoring wells” are	p. 4-8 Figure 4-1
BC11	Replace “formations” with “wells”	p. 4-78; in the paragraph related to Figure 4-19
BC12	Confirm the injection rate used and make a map from the right case if needed; resubmit with corrected caption indicating the right injection rate.	p. 4-79
BC13	Supplement with pressure plume response over time	Page 4-79
BC14	Confirm the cross-sections used and explain the uppermost cells showing CO2 saturation in Figure A-18 that do not seem to appear in Figure A-19.	p. A-20 Figures A-18 and A-19
BC15	Verify what the rate was used in the AOR risk based approach – 3.5M is identified, provide summary of what was used and why. Confirm the injection rate used for AOR delineation (last paragraph); if needed, update the AOR model with the correct injection rate (to match CMG simulation) and update text and Figures A-22 and A-23.	p. A-27
BC16	Square meters vs. millidarcies (express leaky wellbore perm as mD in addition to m ²)	p. A-28
BC17	Request for Carey 2017 and summary of the reason for the selection of 10 ⁻¹⁶ Add a paragraph and/or figure showing justification for the leaky wellbore permeability used	p. A-28

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BC18	Add a map that shows the hypothetical natural leakage potential over the course of the project (after 20 years injection)	p. A-31
BC19	Supplement requested	p. A-31 Table A-5
BC20	Add a map that shows leakage potential after 5 years of injection	p. A-33 Figure A-23
BC21	Request for written explanation of effect on cement if there is CO2 in contact with Class G cement	Section 3.0 AOR well evaluation
BC22	Timing of installation of soil-gas stations	
BC23	Timing of Fox Hills monitoring well	
BC24	Improve maps of groundwater wells	
BC25	Add pressure plume maps (like Figures 4-6 and 4-7)	
BC26	Correct milli siemens to micro siemens	Table 4-5
BC27	Update Burton-Kelly reference with paper published June 2021.	
BC28	Add directional plan table for Unity-1 well. Trajectory every 30 ft.	
BC29	Add top of the Amsden in Figure 3-8 (listed above), and Table 3-5 Herbert Dresser 1-34	Figure 3-8 Table 3-5 Herbert Dresser 1-34
BC30	Correct traffic light in ERRP in the section of induced seismicity and natural earthquake.	Appendix E
BC31	Anhydrite and siltstone for the rel perm	p. A-16 Figure A-13
BC32	Incorrect figure references	p. 2-84
BC33	Fig A-16	p. A-18 Figure A-16
BC34	Corrections on wellbore schematic	Broom Creek

** indicates that a higher resolution version is unavailable.

Doc#	Deadwood Supplement	Location in Application
DW1	Flowline construction plan	p. 2-3 Figure 2-2
DW2	Provide the index of additional well tops used to modify; add wells to map	p. 2-14 Figure 2-8
DW3	Provide better version of figure, hard to see the detail in the stratigraphic information	p. 2-15 Figure 2-9
DW4	Higher resolution of figures; clarify in caption of Figure 2-12b that structure is relative to sea level	p. 2-19 and 2-20 Figures 2-12a and 2-12b
DW5	Provide rates and bottom hole pressures for geochem simulations	p. 2-34
DW6	Supplement requested	p. 2-55
DW7	Include the structure on other figures	p. 2-81 Figure 2-59
DW8	Supplement the Mohr circle with the values and depict on how it was shifted for pore pressure, if it was? (6:18 on hearing audio)	p. 2-83 Figure 2-61
DW9	Initial 5 year pressure map, and incremental 5, 10 and 15 year during injection, already have 20 year included and 10 year post included	p. 2-84 Figure 2-62 p. 3-2 Figure 3-1
DW10	Add springs to well map	p. 3-21 Figure 3-3
DW11	Higher resolution image	p. 3-6 Figure 3-5
DW12	Correct error in table for the existing above ground facilities and describe what these are. Springs too	p. 3-7 Table 3-1
DW13	Request to separate the Black Island and Deadwood	p. 3-9 Tables 3-3 through 3-5
DW14	Request to clarify that we will run temperature logging annually on the 7800 to TD	p. 4-17 Table 4-7
DW15	Provide maps of pressure over time to match the saturation maps	p. 4-21 Figures 4-6 and 4-7
DW16	Fixes to well diagrams	p. 4-23 Figure 4-8 p. 4-54 Figure 4-12 p. 5-2 Figure 5-1
DW17	Add the top of Black Island in the diagram if the well in the AOR. JLOC-1, JROC-1, Little Boot.	Figures 3-6, 3-7**, 3-8
DW18	Consolidate the well type in less type of well (stock, domestic/stock example).	p. 3-21 Figure 3-13
DW19	Correct traffic light in ERRP in the section of induced seismicity and natural earthquake.	Appendix E
DW20	Correction to Section 1.11	Appendix H
DW21	Fracture propagation gradient	p. A-18

Doc#	Deadwood Supplement	Location in Application
DW22	Typo of DW Delta P	p. 4-68
DW23	DW Fig A-15	p. A-19 Figure A-15
DW24	Corrections to wellbore schematic	Deadwood
DW25	Correction to Figure 2-11	Figure 2-11

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Supplement on Flow Line

Minnkota Power Cooperative (MPC) plans to construct a Carbon Capture and Sequestration (CCS) system at their Milton R. Young Power Plant in Oliver County, North Dakota. This system will include one 16-inch OD pipeline that will ultimately supply CO₂ for subsequent injection and sequestration at one proposed well pad location. The flowline will be routed to the Southeast corner of the power plant property, approximately 0.25 miles, to the proposed location of Well Pad #1. An overview of the pipeline system is shown in Figure 1-1. The information contained in this supplement is from a FEED study performed by Burns & McDonnell establishing a design basis manual for use in the final detailed design phase and development of a CCS construction plan. At this time, materials and contractor have not been selected. However, when final construction plan is issued, Minnkota will submit notice of intent a minimum of seven (7) days prior to commencing construction in a form containing all required and requested information in accordance with NDAC § 43-02-03-29.1.

Figure. Proposed Tundra CO₂ Flow Line Overview



Pipeline Design Criteria

The pipeline system will include an inlet meter station near the exit of the CCS facility and a meter station at the well pad site. The CCS facility outlet piping will be designed and routed by others to the boundary of the proposed inlet meter station. An available tie-in point is proposed to be installed at the inlet meter station to supply potential future customers with CO₂ for enhanced oil recovery (EOR). No intermediate pump stations or mainline valves are expected to be required for the project. To monitor for mechanical integrity, direct inspection of the pipeline will be employed.

The pipeline system will have a nominal transportation capacity of 12,980 tons per day of CO₂ transported in dense phase. It is expected that the pipelines shall be operated via a remote control room

whose location will be identified in the future once an operator is determined. If the pipeline and associated facilities are to be operated locally by the CCS operator, MPC advised that additional space will be provisioned in the CCS facility control room to accommodate pipeline operations, if needed. The meter station shall be able to be controlled via a SCADA system from the aforementioned control room. The meter station shall have an RTU building with the capability of communicating with the control room. A mass flow comparison between metering sites will be the primary method of leak detection, however the project proposed to installed a fiber optic alongside the pipe with capability for distributed temperature sensing DTS, Distributed Acoustic and Strain Sensing (DAS/DSS)to proactively monitor the system. In the event that the CSS Facility and Injection Well Facilities are owned and/or operated by a different party than the pipeline, the RTU buildings will be able to house two RTUs and be capable of sharing metering data with the other parties, if applicable.

The design CO₂ stream composition is as follows:

COMPONENT NAME	COMPONENT ID	COMPOSITION	(Mole Fraction - %)
CARBON DIOXIDE	CO ₂	99.90%	99.9
WATER	H ₂ O	632 PPMV	0.0632
NITROGEN	N ₂	163 PPMV	0.0163
ARGON	Ar	4 PPMV	0.0004
OXYGEN	O ₂	6 PPMV	0.0006
SULFUR DIOXIDE	SO ₂	1 PPMV	0.0001
NITROGEN DIOXIDE	NO ₂	1 PPMV	0.0001
NITRIC OXIDE	NO	30 PPMV	0.003

The pipeline inlet conditions (from CCS facility) have been defined as 1,800 psig and 120°F. Using the Peng-Robinson equation of state and assuming isentropic expansion, the decompression pressure was determined to be 1059.68 psig. This value was used in the development of the ductile fracture mitigation.

Aspen HYSYS software was used to perform the hydraulic simulation and generate the phase diagrams.

The pipeline will be designed to comply with Title 49 CFR Part 195 and ASME B31.4 requirements. The pipeline design pressure will be the maximum operating pressure (MOP) of the system, in accordance with 49 CFR Part 195. The maximum operating pressure (MOP) is the maximum pressure at which the system may be operated. For this project, the Design Pressure and MOP are as follows:

- Design Pressure = 1,800 psig
- MOP = 1,690 psig

The ambient design temperatures for all above-grade pipe sections are as follows:

- Maximum Temperature: 120°F
- Minimum Temperature: -50°F

The ambient design temperatures for all below-grade pipe sections are as follows:

- Maximum Temperature: 120°F
- Minimum Temperature: -20°F

The maximum operating temperature shall be 120°F

- Temperature derating factor for pipe, $T = 1.0$

Fluid composition is non-corrosive to the material selected. There is no explicit corrosion allowance provided in the WT design.

Pipe Specification

All pipe shall be manufactured in accordance with API Specification 5L, with adherence to Annex G “PSL 2 Pipe with Resistance to Ductile Fracture Propagation”. The following shall be specified to the manufacturer and recorded for all pipe:

- Outside Diameter (OD)
- Wall Thickness (WT)
- Pipe Grade
- Longitudinal Seam Type
- Specified Minimum Yield Strength (SMYS)
- Joint Design – Bevel
- External Coating
- Minimum Joint Length
- Total Footage or Miles
- Charpy V-Notch Testing Requirements

The proposed pipeline specifications for open-cut, bore, road and station scenarios are as follows:

- Open cut:
 - Design pressure – 1,800 psig
 - Wall thickness - 0.500 inch
 - Nominal size - 16 inch
 - Grade API 5L X-65 PSL 2
 - 44.31% SMYS @ 1,800 psig
 - Seam type – HFW (ERW)

- 40' Double Random Length (DRL) joints
 - Length of pipe joints to be finalized prior to future development of Bill of Material
- Bore / Road / Station Pipe:
 - Design pressure – 1,800 psig
 - Wall thickness - 0.500 inch
 - Nominal size - 16 inch
 - Grade API 5L X-65 PSL 2
 - 44.31% SMYS @ 1,800 psig
 - Seam type – HFW (ERW)
 - 40' Double Random Length (DRL) joints
 - Length of pipe joints to be finalized prior to future development of Bill of Material
- Steel pipe shall be manufactured in accordance with API 5L PSL 2. Steel pipe to be buried shall have 14-16 mils of Fusion Bonded Epoxy (FBE) protective coating.
- Bores and HDD crossings shall be protected by an Abrasive Resistant Overcoat (ARO)

Mainline valves will be installed for the pipeline at the inlet meter station facility and at the well pad meter station.

Transition pieces at the bore locations will not be required for the pipeline, as all pipe and fittings will have a matching wall thickness of 0.500". Changes in wall thickness, if required, will be accomplished by beveling in accordance with ASME B31.4.

To prevent corrosion of the pipeline exterior, all buried pipe and fittings are to be coated with 14-16 mils of fusion bonded epoxy (FBE) coating. Bore pipe to be coated with 14-16 mils of FBE coating and an additional minimum 40 mils of Abrasion Resistant Overcoat (ARO). All girth welds shall be coated with a field applied coating with a minimum thickness equal or greater than the factory coating of the adjacent pipe. Above ground valve assemblies, valves, and piping shall be primed and painted in accordance with the installation specifications to meet operating and ambient temperature conditions to prevent atmospheric corrosion. Gaps between mating flanges shall be protected to prevent entry of foreign materials and moisture.

Ductile Fracture Mitigation

Fracture propagation control is achieved by ensuring that the toughness of the line pipe steel is sufficiently high to arrest propagating fractures. In order to comply with Title 49, Code of Federal Regulations, Part 195, §195.111, mitigation of propagating fractures is being achieved by controlling the minimum toughness of the produced pipe steel. The Battelle Two-Curve Method (TCM) was utilized to determine the minimum toughness for the pipe specification.

The minimum toughness (Charpy V-Notch Impact Energy) requirements for the pipe steel selected is as follows:

Outside Diameter (in)	Wall Thickness (in)	Grade (API 5L)	Minimum Toughness (ft-lb)
16.00	0.500	X65	32

Pipeline Depth, Trench/Fill and Markers

Pipeline minimum depth of cover is 4 ft., typical, to mitigate the likelihood of 3rd party damage, especially in agricultural fields.

Trench bottom shall be smooth and free from rocks, debris and protrusions. Pipe must be installed such that the pipe fits the curvature of the ditch to minimize stresses and protect the pipe coating from damage. Top 12" of topsoil shall be segregated for all excavated areas. All topsoil piles shall be stabilized with mulch or tackifier throughout construction to prevent wind and water erosion. Topsoil is not to be mixed with subsoils during any construction activity. After backfill is in place and suitable subsoil contours are reestablished, subsoil shall be properly de-compacted prior to redistributing topsoil. The final grade must not alter current drainage or allow ponding of water.

Pipe must be backfilled in a manner that provides firm support under the pipe. Pipe must be backfilled to 90% relative compaction with sand or rock-free native soil to a minimum 1 ft. above top of pipe in a manner that prevents damage to the pipe and coating from equipment or from the backfill material. Remainder of trench shall be backfilled with native soil to 90% relative compaction.

Pipeline markers shall be installed at minimum in accordance with the following requirements:

- Markers must be located at each public road crossing, at each railroad crossing, at each waterway crossing, at major pipeline changes in direction and in sufficient number along the remainder of each buried line so that its location is accurately known.
- The marker must state at least the following on a background of sharply contrasting color:

- The word “Warning,” “Caution,” or “Danger” followed by the words “Carbon Dioxide Pipeline,” all of which, except for markers in heavily developed urban areas, must be in letters at least 1 inch (25 millimeters) high with an approximate stroke of 1/4 inch (6.4 millimeters).
- The name of the operator and a telephone number (including area code) where the operator can be reached at all times.

Cathodic Protection and AC Mitigation

The pipeline will use an impressed current cathodic protection system. AC rectifiers and ground beds will be required for cathodic protection of all pipelines. Sacrificial anodes will be used to protect the buried station piping where isolated from the impressed current system. The cathodic protection will be designed to meet the requirements of 49 CFR, Part 195 and the recommended practices of NACE SP0169 and supplemented by ISO 15589-1. Isolation flange kits will be installed to isolate areas requiring electrical isolation, e.g. station piping.

It is recommended that during the detailed design phase, a soil resistivity survey be performed along the pipeline route to support the design of the cathodic protection system and the AC mitigation system, if applicable. From the desktop route review, AC Mitigation is not expected to be required, however, it is recommended that an AC risk analysis be performed during the detailed design phase of the project, followed by computer-based modeling and mitigation system design, if deemed necessary. If high risk areas are identified, appropriate AC mitigation measures will be incorporated in the design of the system in accordance with NACE RP 0177-2000.

During commissioning of the CP system, it is required that an ACVG or DCVG survey be performed on the line after backfill to verify the absence of coating holidays and that a close-interval survey be performed to confirm the performance of the CP system. All wiring at the rectifier and test stations shall be confirmed to have been properly installed and readings shall be collected at these locations to confirm system performance.

Strength Testing and Drying

In accordance with 49 CFR, Part 195, the pipelines shall be hydrostatically tested to a minimum of 1.25 times the design pressure of 1,800 psig (2,250 psig) for a minimum 8 hours. Test pressures shall not exceed 4,062 psig (100% of SMYS for 16”, 0.500, X-65 pipe)

- If CL 900 fittings are present, test pressures shall not exceed 3,330 psig (1.5 x 2,220 psig for CL 900).
- Water withdrawal/sourcing shall be permitted prior to construction. It is assumed surface water will be used for testing.
- All fill water if taken from surface sources shall be tested prior to withdrawal.

- All fill water shall be free of contaminants that may be removed by filtering.

Water shall be discharged into a dewatering structure in an upland area and shall be permitted prior to construction.

Hydrostatic calculations to be performed in detailed design and will include test section breaks (not anticipated), minimum and maximum test pressures, water volumes, intake and discharge locations (if required). After successful hydrotest, the pipeline shall be dewatered and dried to a minimum dew point of -40°F.

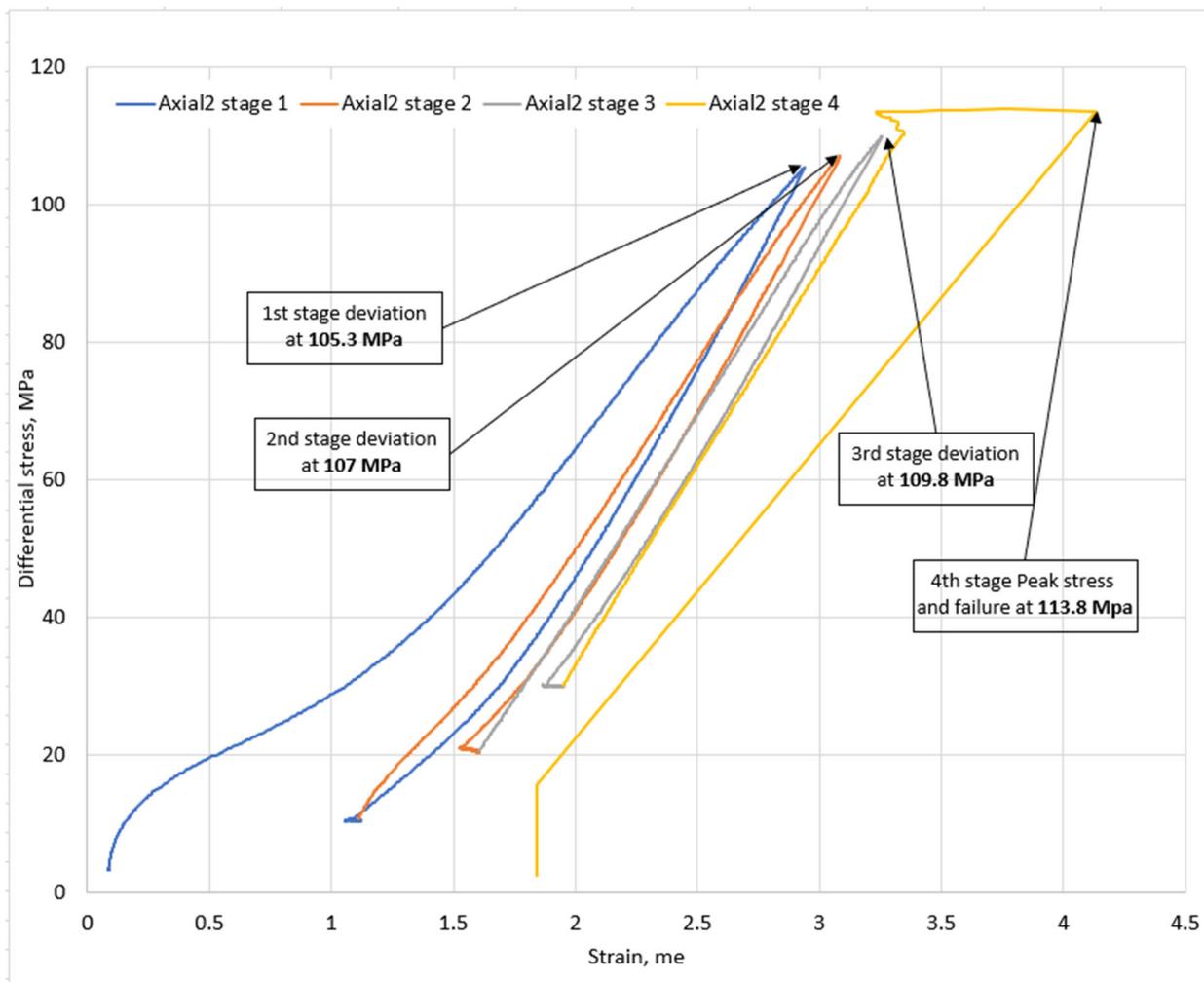


Figure 2-65. Results of multistage triaxial test performed at confining pressures exceeding 40 MPa (5,800 psi), providing information regarding the elastic parameters and peak strength of the **Anhydrite** rock sample. Failure occurred at the fourth-stage peak stress of 113.8 MPa (16,505 psi).

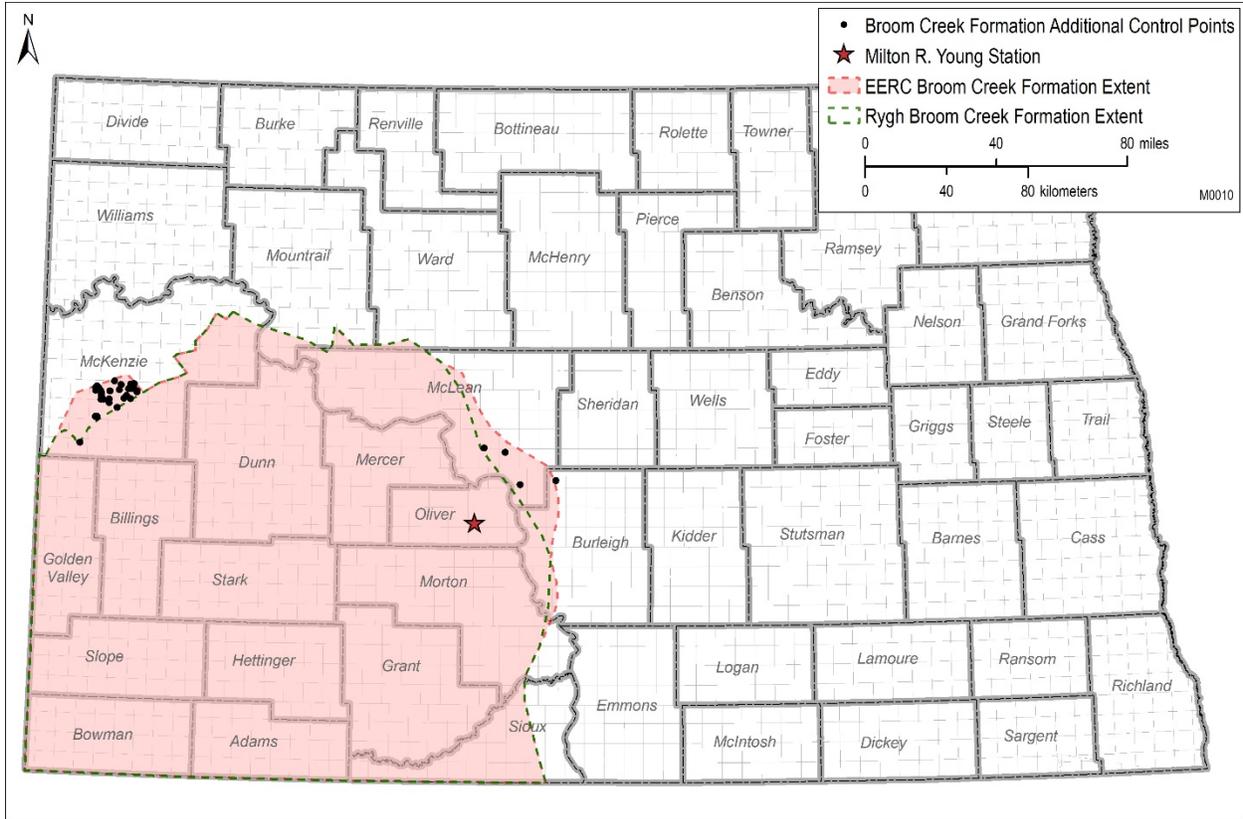


Figure 2-9. Broom Creek Formation in North Dakota. The area within the green dashed line shows the extent originally proposed by Rygh (1990) and the area outside the green line has been modified based on new well control in the State.

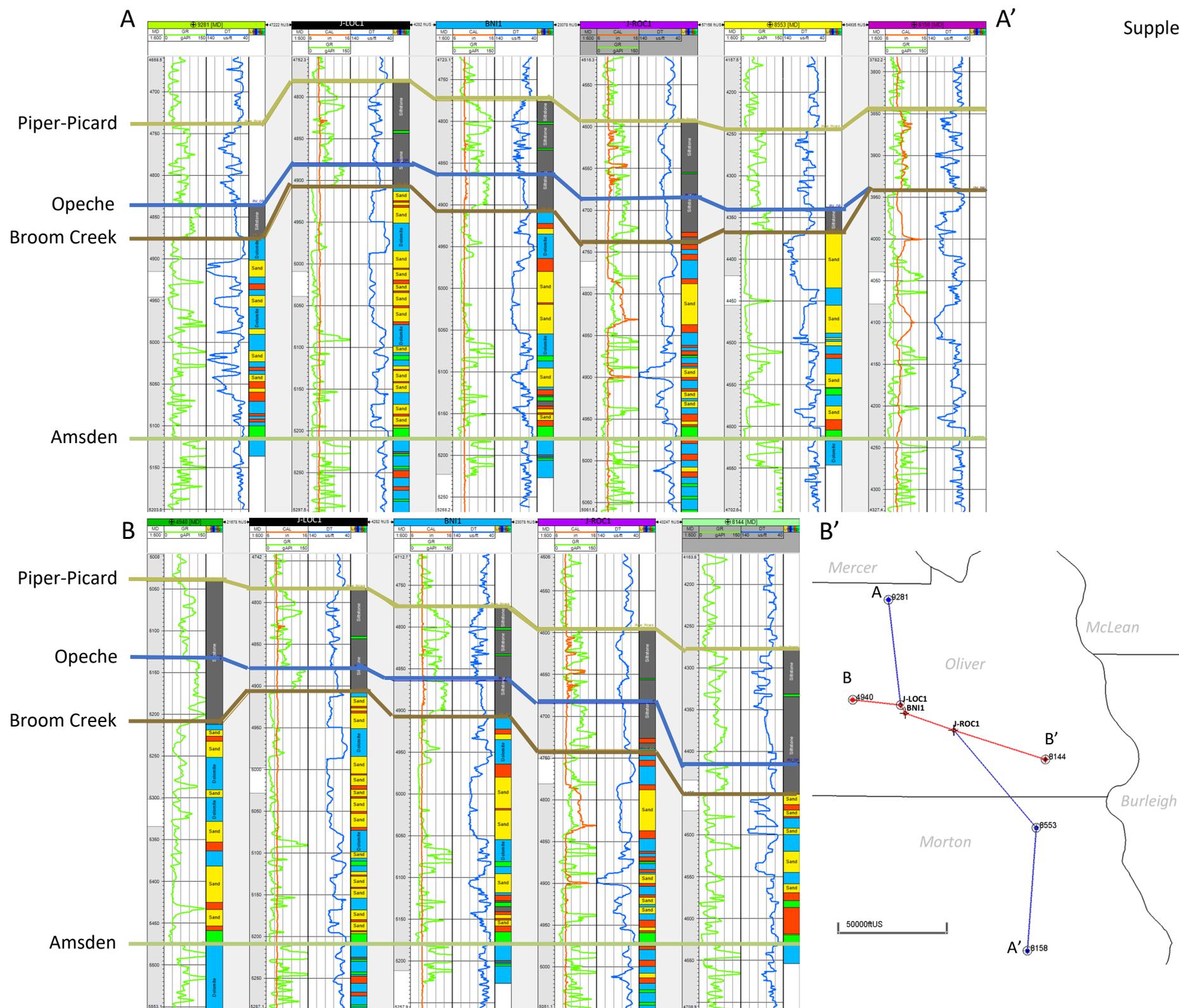


Figure 2-12a. Regional well log stratigraphic cross sections showing the structure of the Opeche–Picard and Broom Creek Formations flattened on the top of the Amsden Formation. The logs displayed on the tracks from left to right are 1) GR (green) and caliper (red), 2) delta time (blue), and 3) interpreted lithology log.

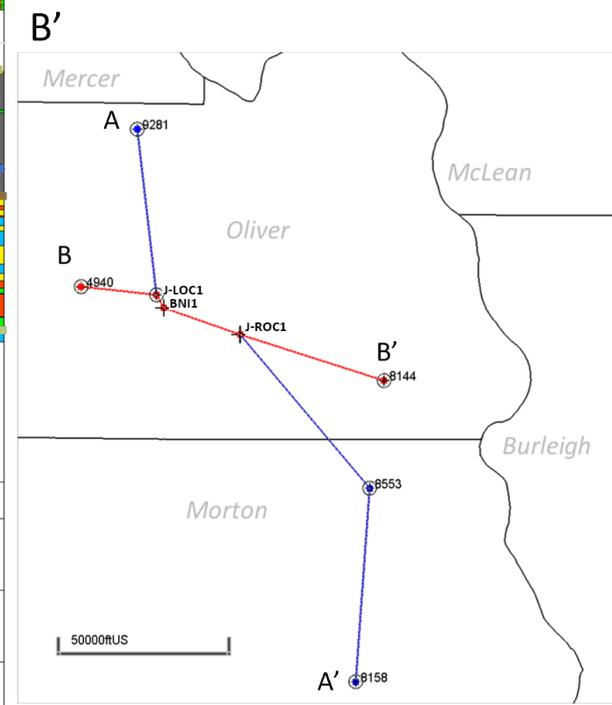
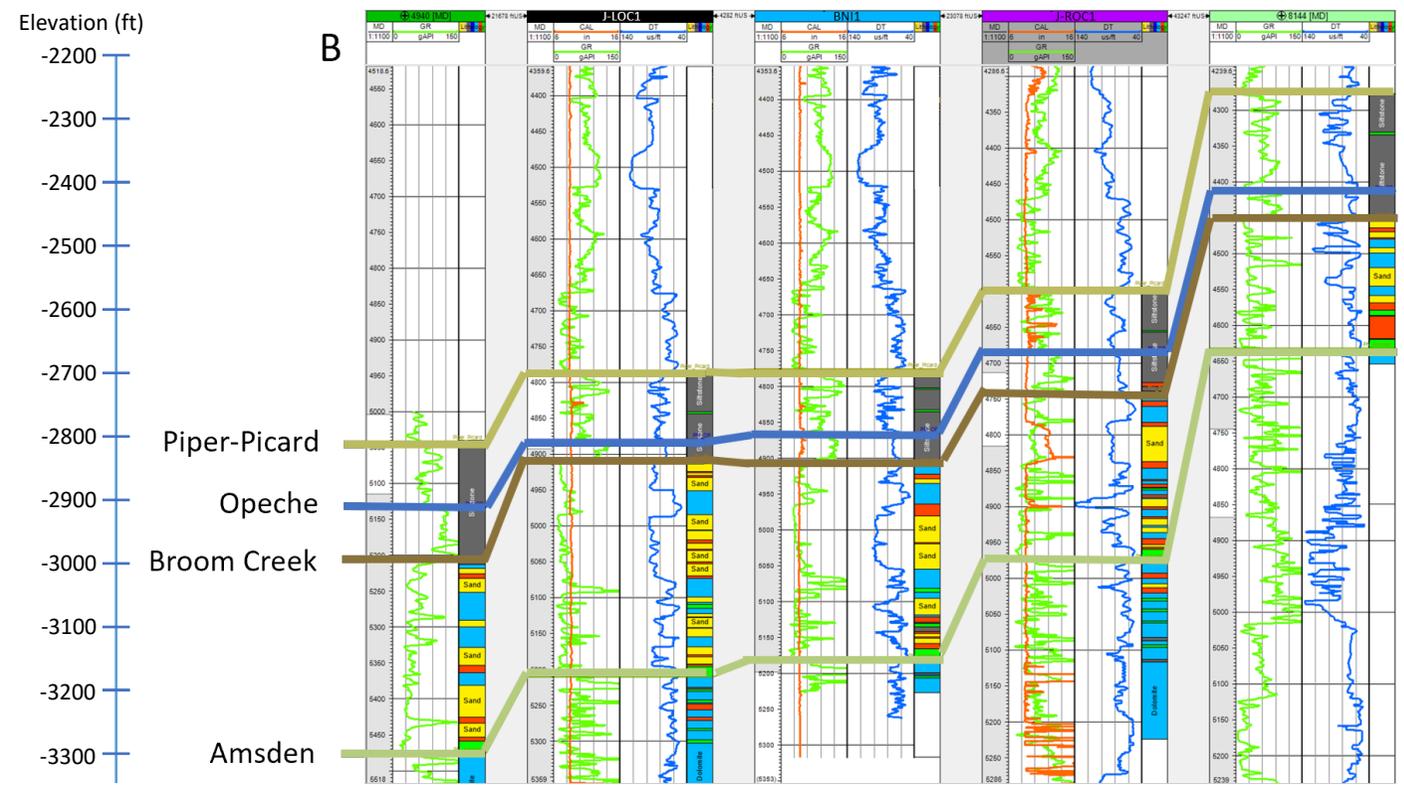
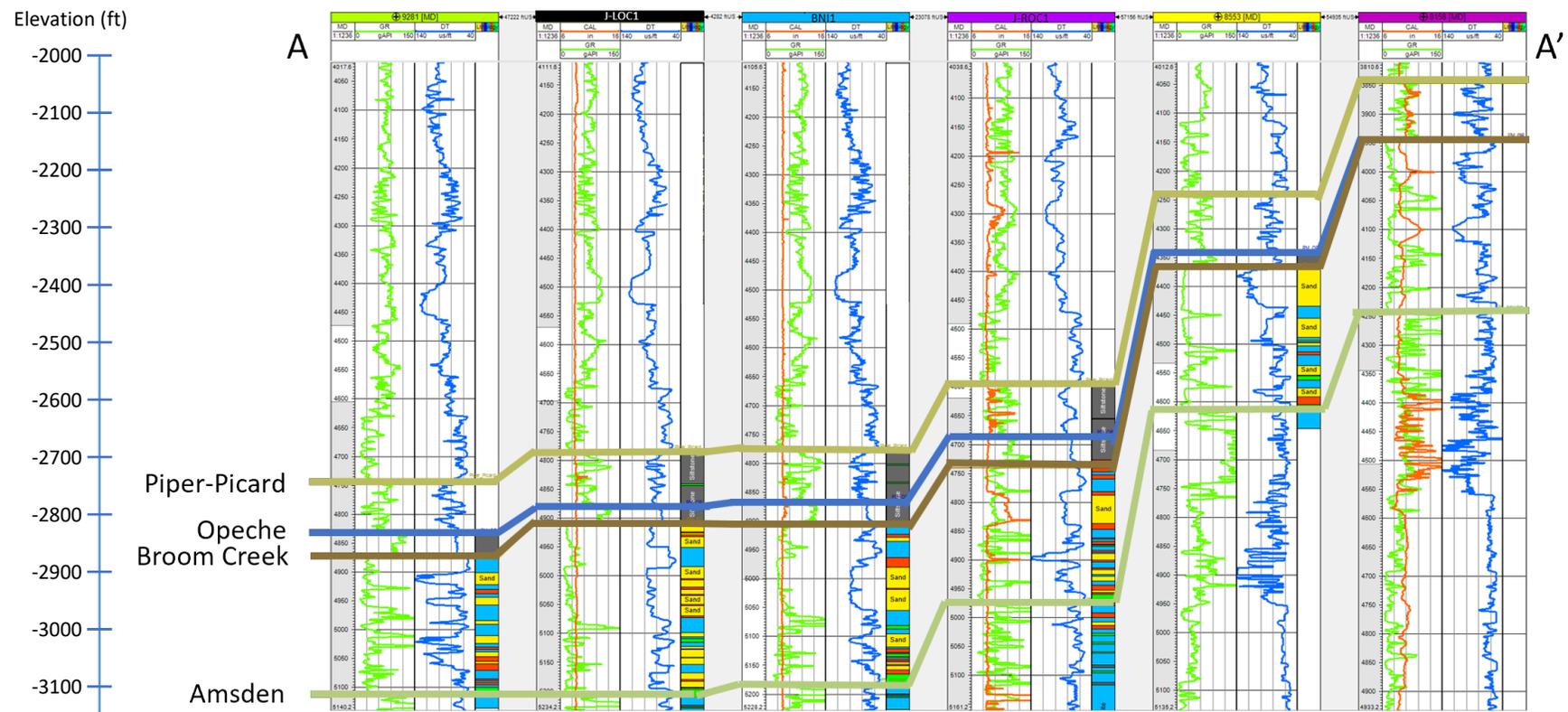


Figure 2-12b. Regional well log cross sections showing the structure of the Opech-Picard, Broom Creek, and Amsden Formations. The logs displayed on the tracks from left to right are 1) GR (green) and caliper (red), 2) delta time (blue), and 3) interpreted lithology log.

Formation	Broom Creek
Perforation Interval (ft)	4,912 to 4,922
Estimated Formation Thickness (ft)	38
Tested Interval Thickness (ft)	38
Formation Transmissibility (mD.ft)	170,458
Formation Permeability (mD)	4,485
Skin Factor	89.6
Investigation Radius (ft)	24,804
Boundary Condition	Infinite Acting
Comments	Quality FPO test, good confidence in formation parameters assessed with numerical model. Noted skin damage changing between the step rate and constant rate test.

Figure 2-19. Broom Creek well test summary of J-LOC1 well (modified from Schlumberger presentation).

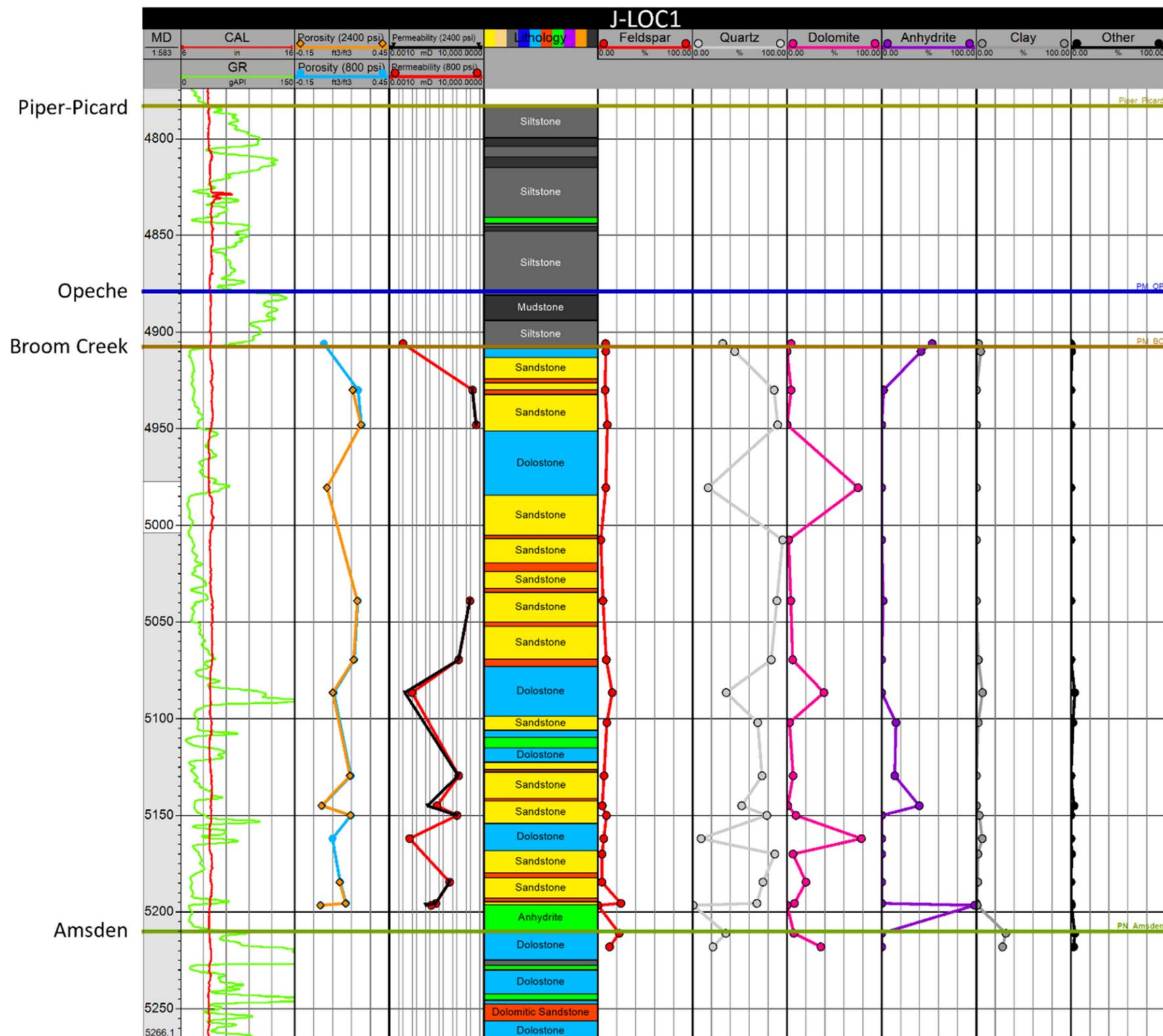


Figure 2-20. Laboratory-derived mineralogical characteristics of the Broom Creek Formation.

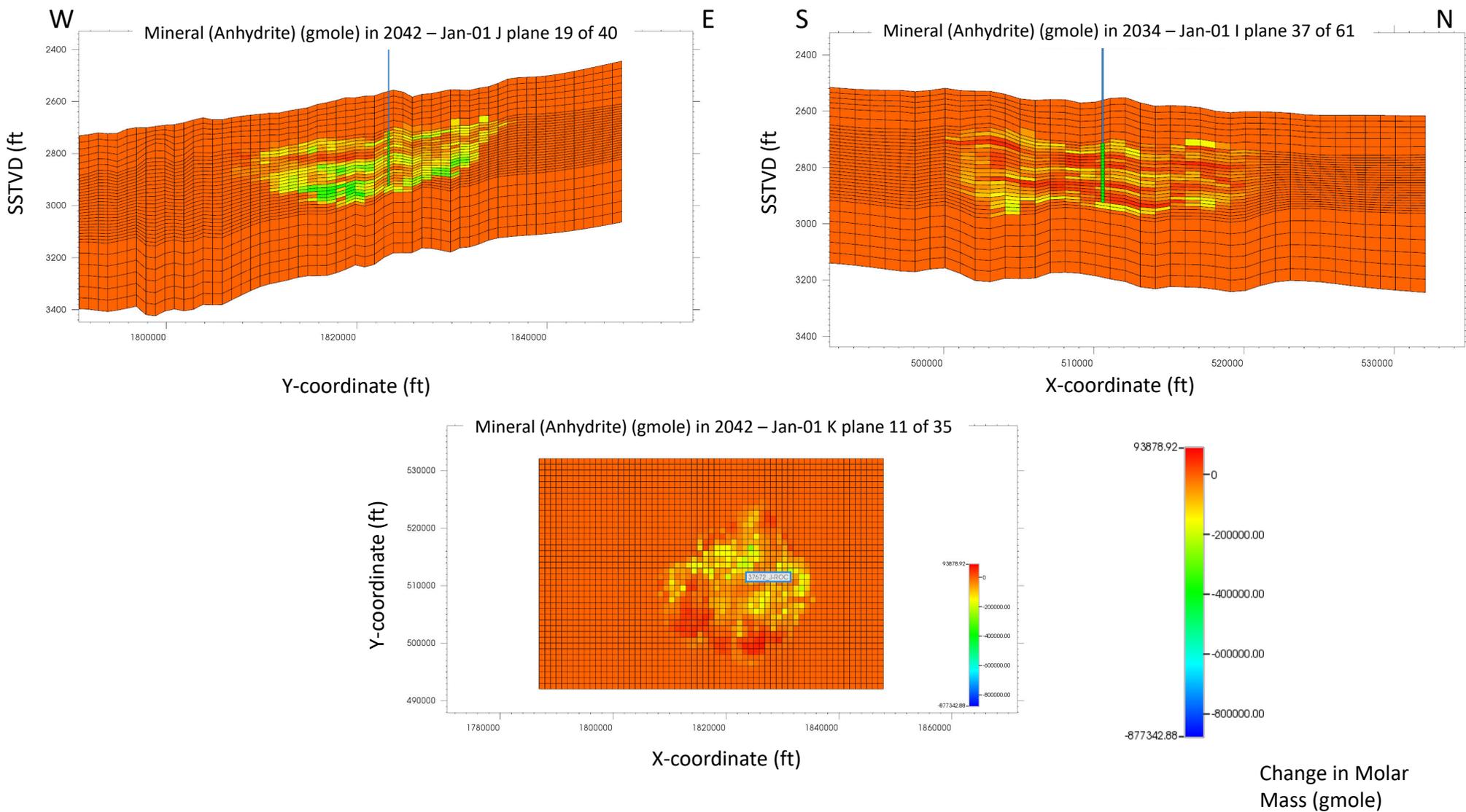


Figure. Molar mass dissolution/distribution for anhydrite.

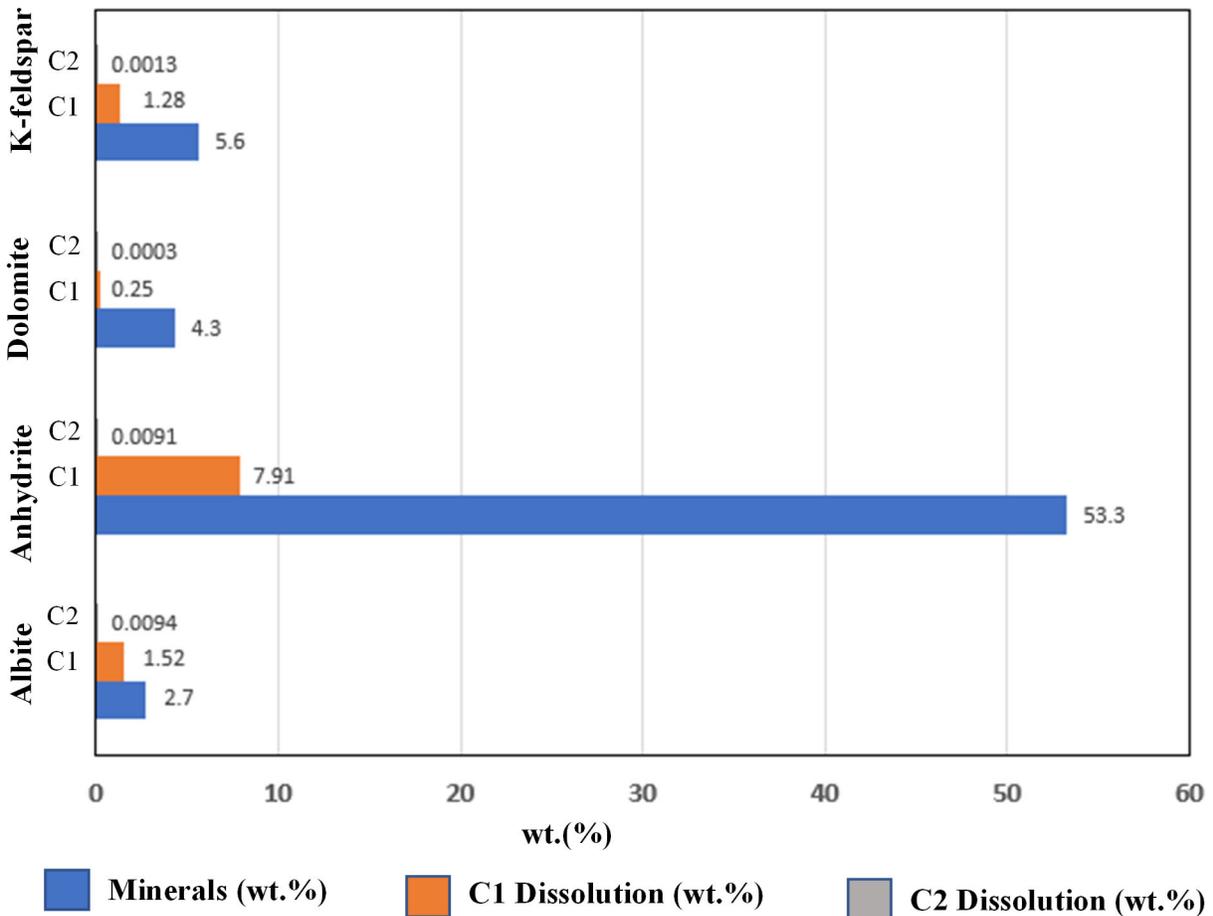


Figure. Weight percentage (wt. %) of potentially reactive minerals present in the Opeche/Spearfish Formation geochemistry model before simulation (blue) and expected dissolution of minerals in Cell 1 (C1) (orange) and Cell 2 (C2) (gray) after 20 years of injection plus 25 years of post-injection. (gray).

Simulations showed no leakage of CO₂ into the overlying confining zone, the Opeche/Spearfish Formation, due to the impermeable nature of the formation. To demonstrate any potential geochemical reactions if CO₂ did interact with the overlying confining zone, PHREEQC geochemical software was used. PHREEQC does not account for permeability and therefore allows for modeling geochemical interactions of the CO₂ with the impermeable Opeche/Spearfish Formation. The figure above represents initial potentially reactive mineral composition of the Opeche/Spearfish Formation based on XRD data shown in Table 2-16 and expected mineral dissolution in weight percentage in Cell 1 and Cell 2 of the model. Dissolution (wt%) in Cell 2 is minimal (<0.01 wt%). Dissolution of albite and K-feldspar enhances the precipitation of illite and quartz (Figure 2-41). Dissolution of anhydrite is likely influencing precipitation of calcite.

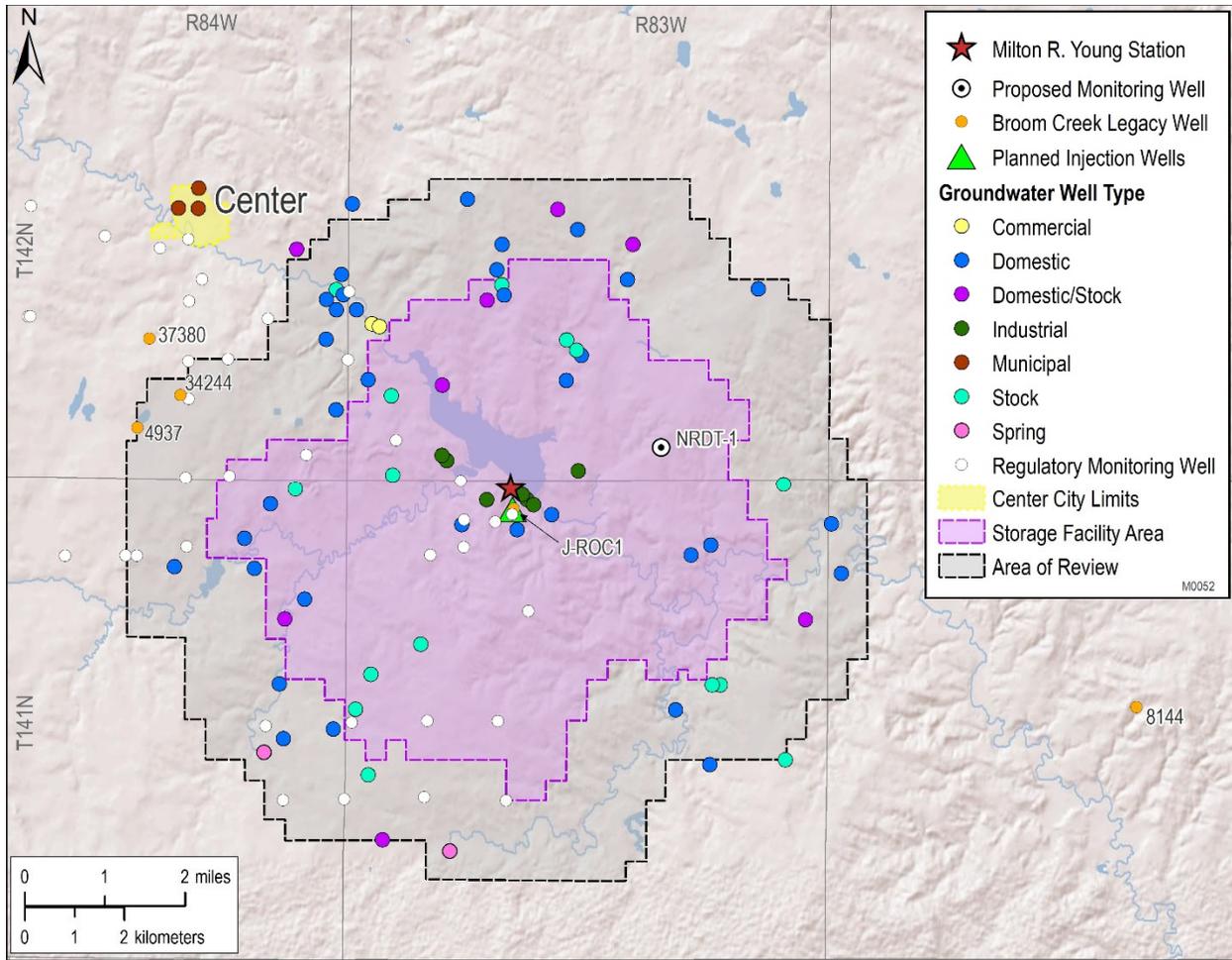


Figure 3-3. AOR map in relation to nearby legacy wells and groundwater wells. Shown are the storage facility area and AOR boundaries.

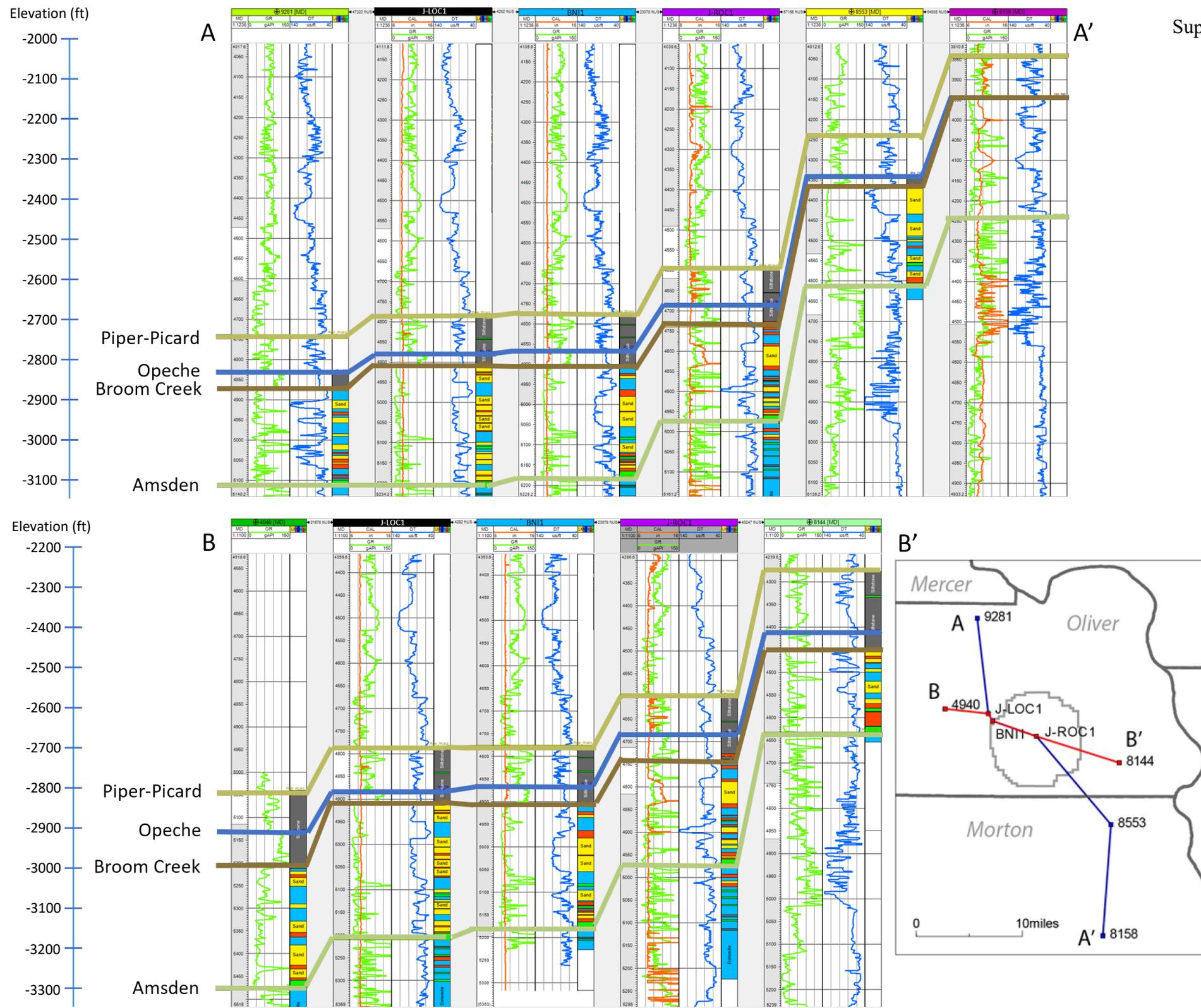


Figure 3-5. Regional well log stratigraphic cross sections of the Opeche, Piper-Picard, and Broom Creek Formations flattened on the top of the Amsden Formation, with inset map demonstrating the location of the J-ROC1 and J-LOC1 wells within the AOR boundary. The logs displayed in tracks from left to right are 1) gamma ray (GR, green) and caliper (red), 2) delta time (blue), and 3) interpreted lithology log.

Table 3-1. Investigated and Identified Surface and Subsurface Features (Figures 3-1 through 3-5)

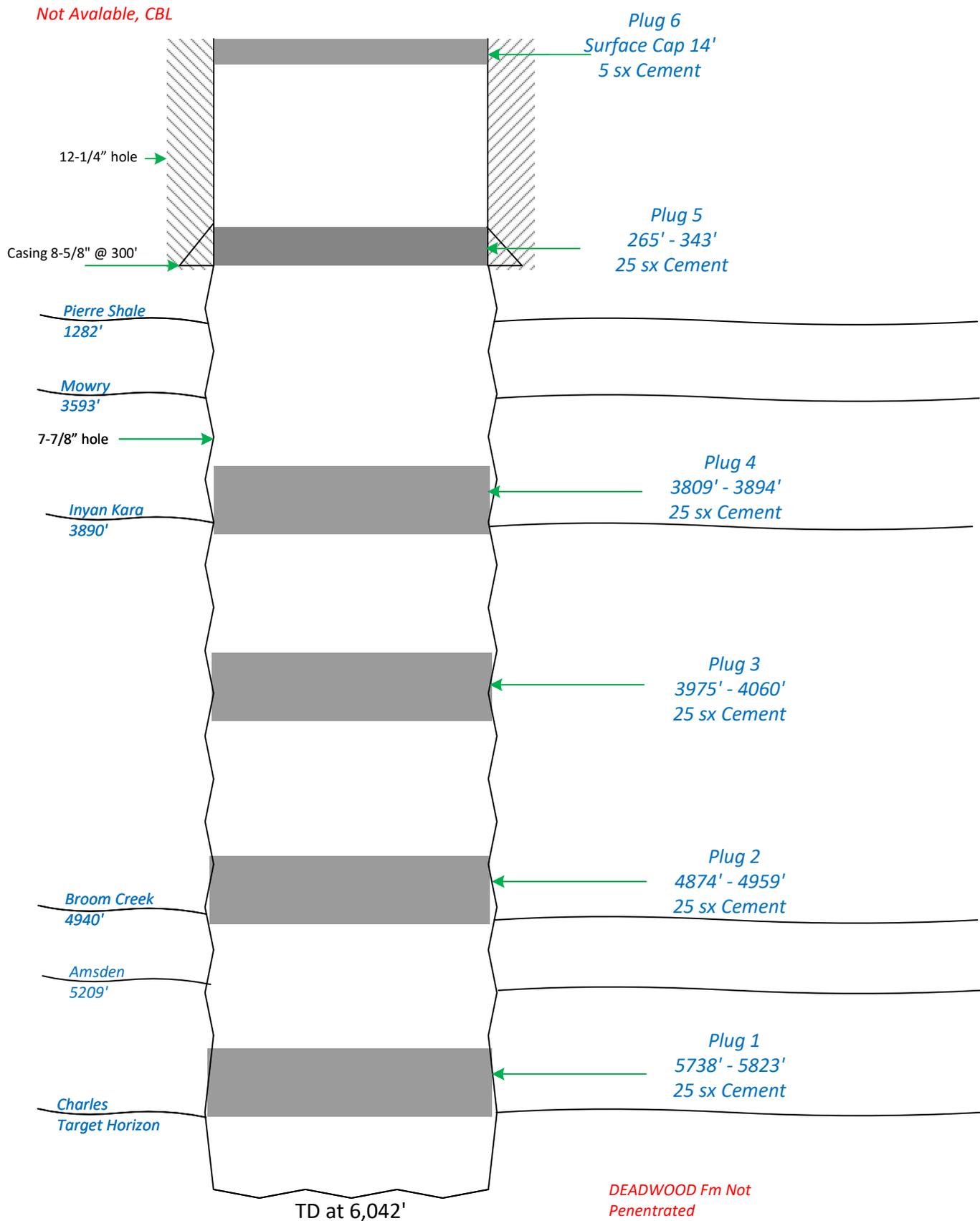
Surface and Subsurface Features	Investigated and Identified (Figures 3-1 through 3-5)	Investigated But Not Found in AOR
Producing (active) Wells		X
Abandoned Wells	X	
Plugged Wells or Dry Holes	X	
Deep Stratigraphic Boreholes	X	
Subsurface Cleanup Sites		X
Surface Bodies of Water	X	
Springs	X	
Water Wells	X	
Mines (surface and subsurface)	X	
Quarries		X
Subsurface Structures (e.g., coal mines)	X	
Location of Proposed Wells	X	
Location of Proposed Cathodic Protection Boreholes*		X
Any Existing Aboveground Facilities	X	
Roads	X	
State Boundary Lines		X
County Boundary Lines	X	
Indian Boundary Lines		X
Other Pertinent Surface Features**	X	

* Cathodic protection planned with location TBD.

** Center, North Dakota, city limit boundary.

HERBERT DRESSER 1-34

NDIC Well File No. 4937



Note:
* Assumed class G cement was used for the cement plug
* Cement yield is 1.15 cuft/sack, all plugs has the same yield value

Not to scale

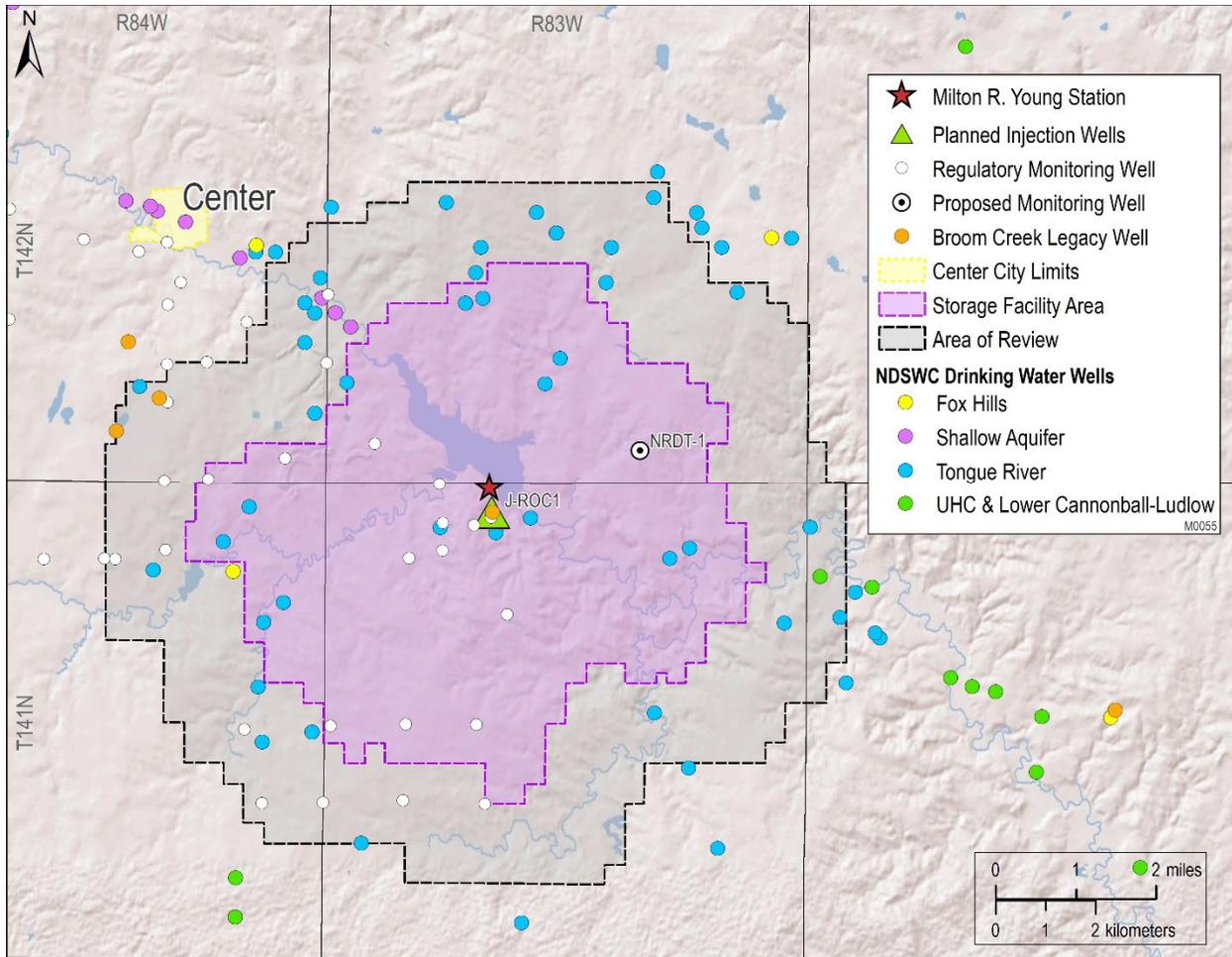


Figure 4-1. Minnkota will carry out an initial sampling program for the near-surface groundwater wells. Shown are existing monitoring wells to be used for the baseline; all wells listed for drinking water in the NDSWC database by aquifer; location of all plugged and abandoned legacy oil and gas exploratory wells; city of Center, North Dakota; Milton R. Young Station (MRYS); and Liberty-1 (J-ROC1 File No. 37672) and Unity-1 proposed injectors, and NRDT-1 (proposed monitoring well) in relation to the storage facility area and AOR. The well drilled for baseline characterization and monitoring of the Fox Hills Formation will be located at the injection wellsite.

will be extended beyond 10 years if it is determined that additional data are required to demonstrate a stable CO₂ plume and safety of USDWs. The nature and duration of that extension will be determined based upon an update of this plan and NDIC approval.

In addition to executing the postinjection monitoring program, the Class VI injection and monitoring wells will be plugged as described in the plugging plan of this permit application (Section 4.6), all surface equipment not associated with long-term monitoring will be removed, and surface land of the site will be reclaimed to as close as practical to its original condition. Lastly, following the plume stability demonstration, a final assessment will be prepared to document the status of the site and be submitted to NDIC as part of a site closure report.

4.7.1 Predicted Postinjection Subsurface Conditions

4.7.1.1 Pre- and Postinjection Pressure Differential

Model simulations were performed to estimate the change in pressure in the Broom Creek Formation during and after the cessation of CO₂ injection. The simulations were conducted for 20 years of CO₂ injection in both wells at a rate of 2 MMt per year, followed by a postinjection period of 10 years.

Figure 4-19 shows the predicted pressure differentials in the Broom Creek Formation at the conclusion of 20 years of CO₂ injection. As shown, at the time that CO₂ injection is stopped in both formations, the models predict an increase in the pressure of the reservoir, with a maximum pressure differential of 336 to 434 psi at the location of the injection well. It is important to note that this maximum pressure increase is not sufficient to move formation fluids from the storage reservoir to the deepest USDW. The details of these pressure evaluations are provided as part of the AOR delineation of this permit application (see Appendix A).

A description of the predicted decrease in the pressure profile of the Broom Creek Formation over the 10-year postinjection period is provided in Figure 4-20. As expected, the pressure in the reservoir gradually decreases over time following the cessation of CO₂ injection, with the pressure at the injection well after 10 years of postinjection predicted to decrease 186 to 284 psi as compared to the pressure at the time CO₂ injection was terminated. This trend of decreasing pressure in the storage reservoirs is anticipated to continue over time until the pressure of the storage reservoir approaches the original storage reservoir pressure conditions prior to any CO₂ injection activities.

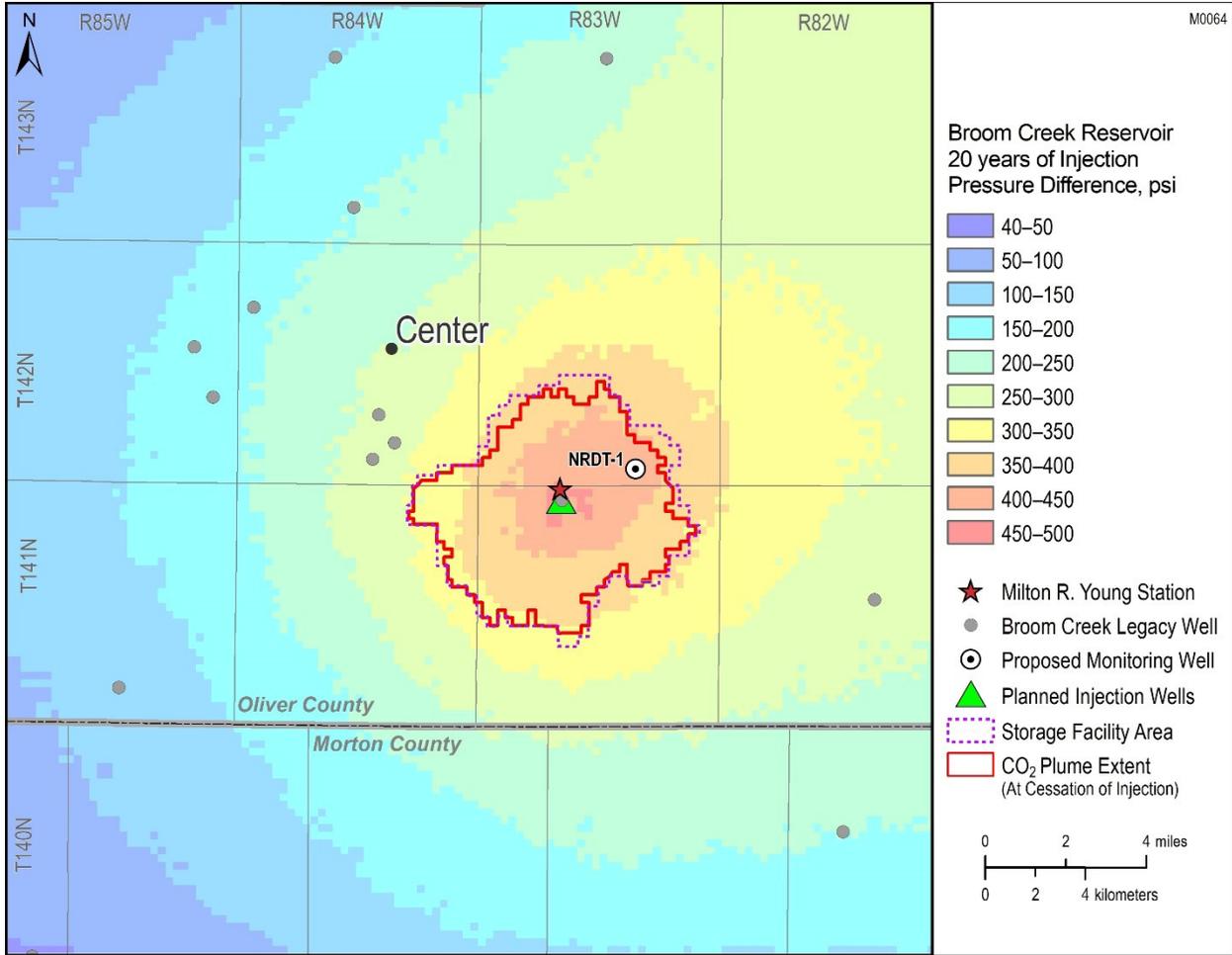
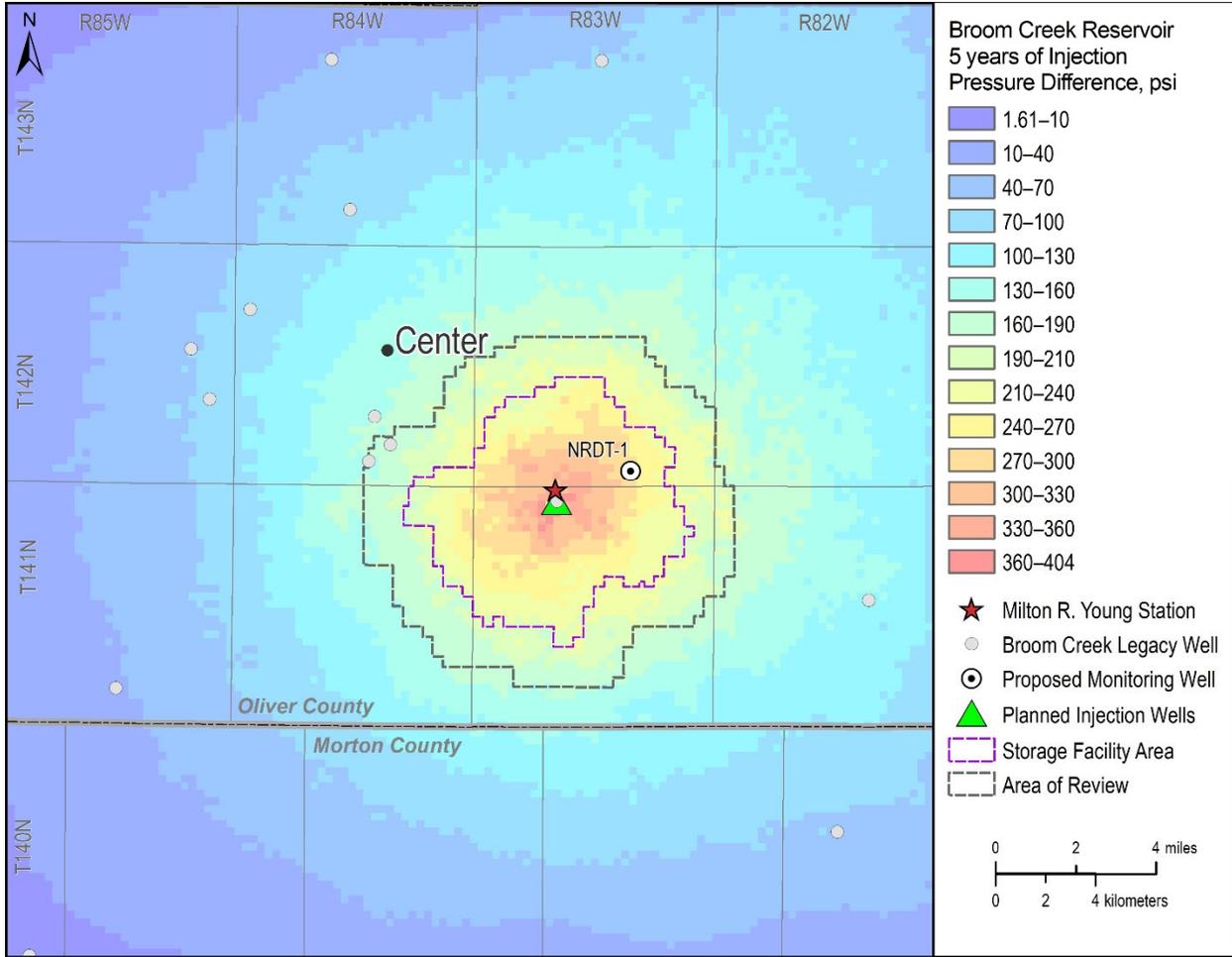
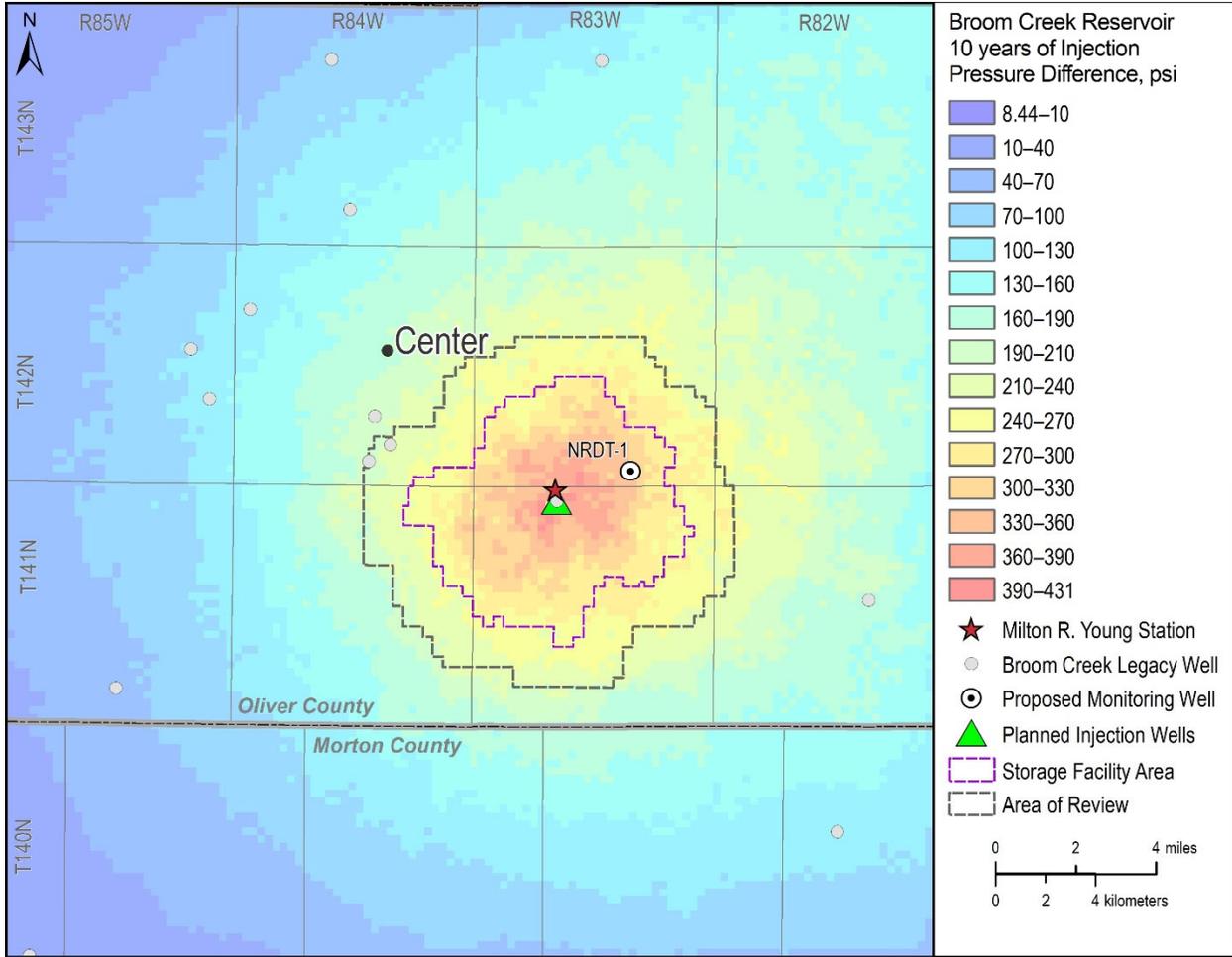
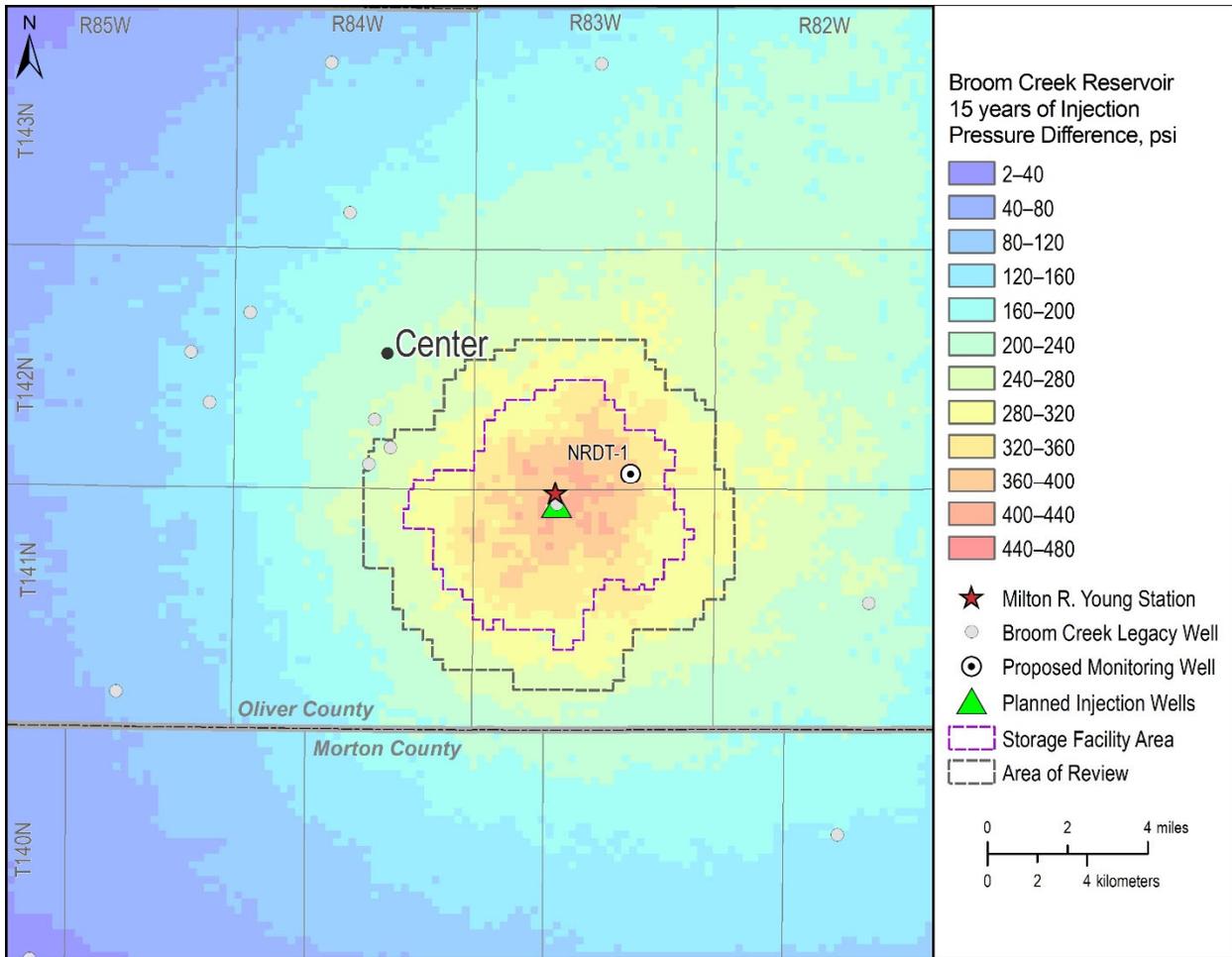


Figure 4-19. Predicted pressure increase in storage reservoir following 20 years of injection of 4 MMt per year for 15 years, and 3.5 MMt per year for 5 years of CO₂.







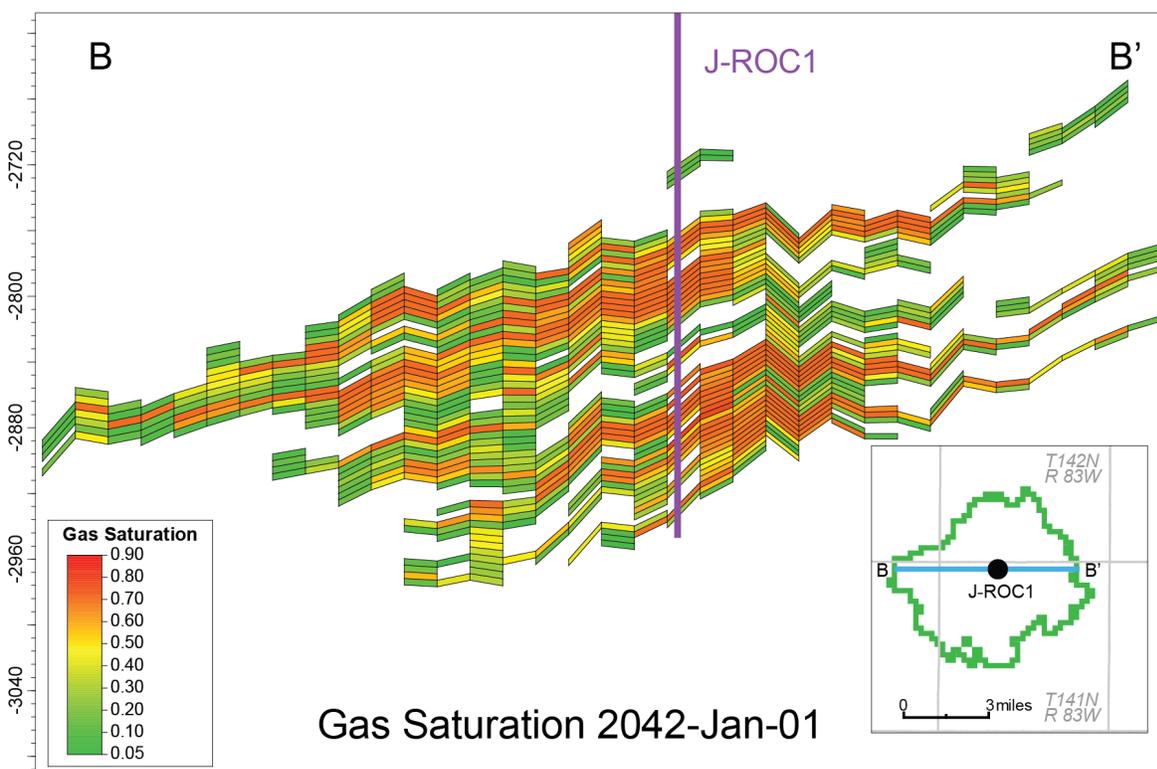


Figure A-19. CO₂ plume boundary and cross section at the end of injection displayed east to west through the J-ROC1 well.

Maximum Injection Pressures and Rates

An additional case was run to determine if the wells would ultimately be limited by the maximum WHP of 1,700 psi or maximum calculated downhole pressures of 3,035.1 and 3,018.3 psi for the J-ROC1 and Unity-1 wells, respectively. Results of a step rate test performed within the Broom Creek Formation, over an interval from 4,912 to 4,922 ft, indicated a fracture propagation pressure of 3,593 psi, resulting in an estimated fracture propagation pressure gradient of 0.71 psi/ft. The propagation pressure gradient was used to calculate maximum BHP constraints, based upon 90% of the fracture propagation pressure. In this scenario, the group injection limit of 4.0 MMt per year for the first 15 years and 3.5 MMt per year for the last 5 years was removed. Other parameters were kept the same for the additional tests.

The maximum BHPs were reached in the simulation before the maximum WHPs were encountered. At the maximum BHP of 3,035.1 and 3,018.3 psi, the corresponding predicted maximum wellhead injection pressure responses were 1,443 and 1,487 psi, respectively, for the J-ROC1 and Unity-1 wells, respectively. In addition, the average surface injection pressures were 1,432 and 1,467 psi, respectively (Figure A-20). In this scenario, the J-ROC and Unity-1 wells were able to inject at daily average rates of 5,225 and 5,873 tonnes/day of CO₂, respectively, with the planned 7-in.-diameter tubing, thereby achieving a total injection volume of 81.3 MMt of CO₂.

CO₂ Injection Parameters

The ASLMA Model for Tundra SGS used a Broom Creek CO₂ injection rate that matched the simulation scenario. A single injector is placed at the center of the ASLMA model grid at an x,y-location of (0,0) in the coordinate reference system. The ASLMA Model requires the CO₂ injection rate to be converted into an equivalent-volume injection of formation fluid in units of cubic meters per day. Microsoft Excel VBA functions were used to estimate the CO₂ density from the storage reservoir pressure and temperature, which resulted in an estimated density of 677 kg/m³. The CO₂ mass injection rate and CO₂ density are then used to derive the daily equivalent-volume injection rate of approximately 16,186 m³ per day for 15 years followed by 14,163 m³ per day for 5 years.

The maximum vertically averaged storage reservoir change in pressure at the end of the simulated injection period was 590 psi in the raster cell intersected by the injection well, which corresponds to less than 0.028 m³ of flow over 20 years.

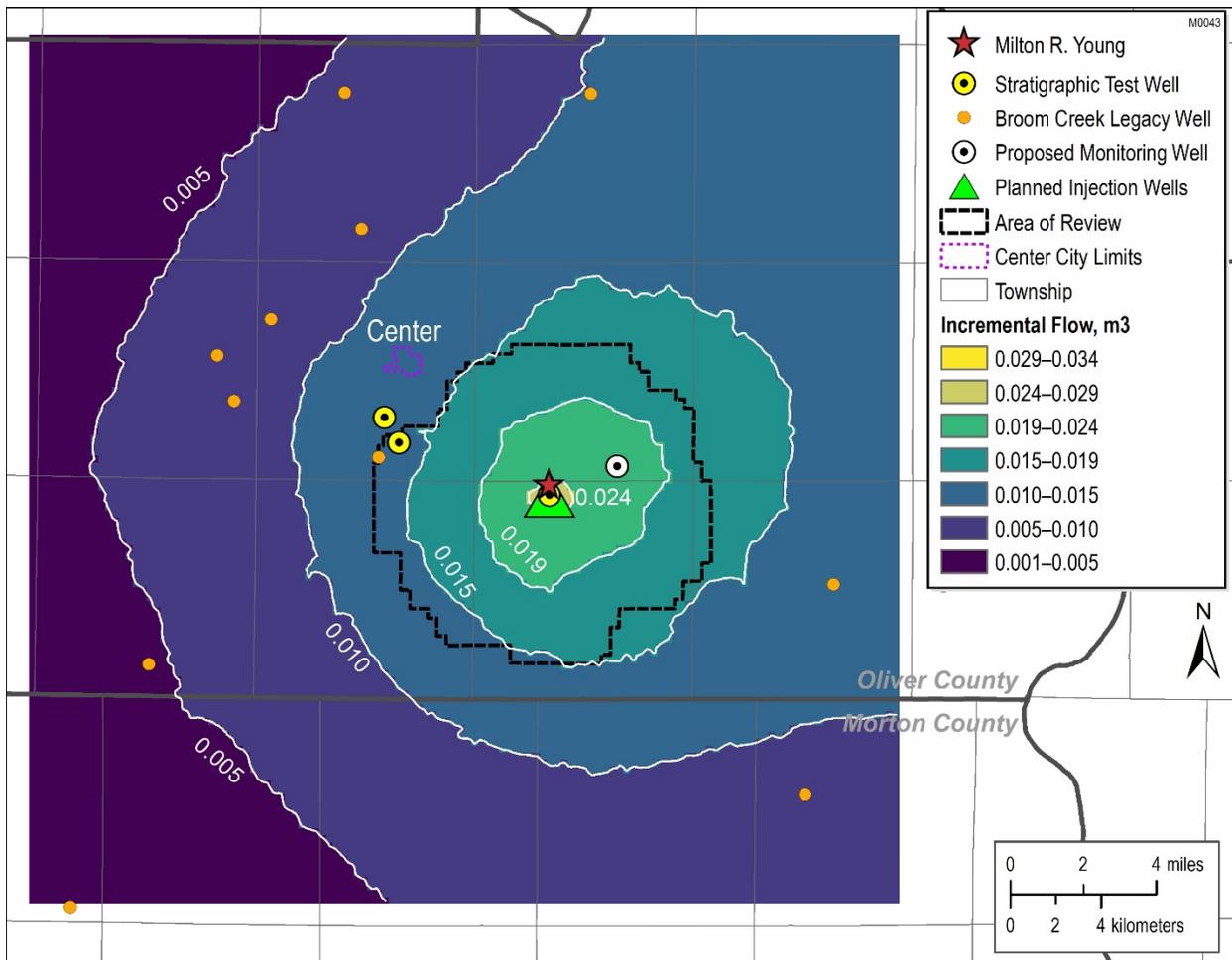


Figure A-23. Incremental leakage maps at the end of 20 years of CO₂ injection for the scenario where the leaky wellbore is closed to Aquifer 2 (thief zone). The dotted black polygon denotes the areal extent of the CO₂ plume in the storage reservoir plus 1-mile buffer at the end of 20 years of CO₂ injection as determined using a compositional simulator and the site-specific geologic model.

cubic meters per day. Microsoft Excel VBA functions were used to estimate the CO₂ density from the storage reservoir pressure and temperature, which resulted in an estimated density of 677 kg/m³. The CO₂ mass injection rate and CO₂ density are then used to derive the daily equivalent-volume injection rate of approximately 14,163 m³ per day.

Hypothetical Leaky Wellbore

In the Tundra SGS area, few wellbores are known to exist that penetrate the primary seal of the Broom Creek storage reservoir. However, for heuristic, what-if scenario modeling, which is needed to generate the data for delineating a risk-based AOR, a single hypothetical leaky wellbore is inserted into the ASLMA Model at 1, 2, ..., 100 km from the CO₂ injection well. The pressure buildup in the storage reservoir at each distance, along with the recorded cumulative volume of formation fluid vertically migrating through the leaky wellbore from the storage reservoir to the USDW (i.e., from Aquifer 1 to Aquifer 3) throughout the 20-year injection period, provide the data set needed to derive the risk-based AOR.

Published ranges for the effective permeability of a leaky wellbore have included an “open wellbore” with an effective permeability as high as 10⁻⁵ m² (1010 mD) to values more representative of leakage through a wellbore annulus of 10⁻¹⁰ to 10⁻¹² m² (10⁵ to 10³ mD) (Watson and Bachu, 2008, 2009; Celia and others, 2011). Carey (2017) provides probability distributions for the effective permeability of potentially leaking wells at CO₂ storage sites and estimated a wide range from 10⁻¹⁰ to 10⁻²⁰ m² (10⁵ to 10⁻⁵ mD). For the Tundra SGS Broom Creek ASLMA Model, the effective permeability of the leaky wellbore is set to 10⁻¹⁶ m² (0.1 mD), which is a relatively conservative (highly permeable) value near the top of the published range for the effective permeability of potentially leaking wells at CO₂ storage sites.

The current work uses the ASLMA Model Type 1 feature (focused leakage only) for the nominal model response, which makes the conservative assumption that the aquitards are impermeable. This assumption prevents the pressure from diffusing into the overlying aquitards, resulting in a greater pressure buildup in the storage reservoir and commensurately greater amount of formation fluid vertically migrating from the storage reservoir through the leaky wellbore. The conservative assumption of Model Type 1 rather than Model Type 3 (coupled focused and diffuse leakage) provides an added level of protection to the delineation of a risk-based AOR by projecting a larger pressure buildup in the storage reservoir and, therefore, a greater leakage of formation fluid up the leaky wellbore.

Saline Aquifer Thief Zone

As shown in Table A-5, a saline aquifer (Aquifer 2, Inyan Kara Formation) exists between the primary seal above the storage reservoir and USDW (Aquifer 3, Fox Hills Formation). Formation fluid migrating up a leaky wellbore that is open to Aquifer 2 will preferentially flow into Aquifer 2, and the continued flow up the wellbore and into the USDW will be reduced. Therefore, the presence of Aquifer 2 may act as a thief zone and reduces the potential for formation fluid impacts to the groundwater.

The thief zone phenomenon was described by Nordbotten and others (2004) as an “elevator model,” by analogy with an elevator full of people on the main floor, who then get off at various floors as the elevator moves up, such that only very few people ride all the way to the top floor. The term “thief zone” is also used in the oil and gas industry to describe a formation encountered during drilling into which circulating fluids can be lost. Models with and without opening the leaky

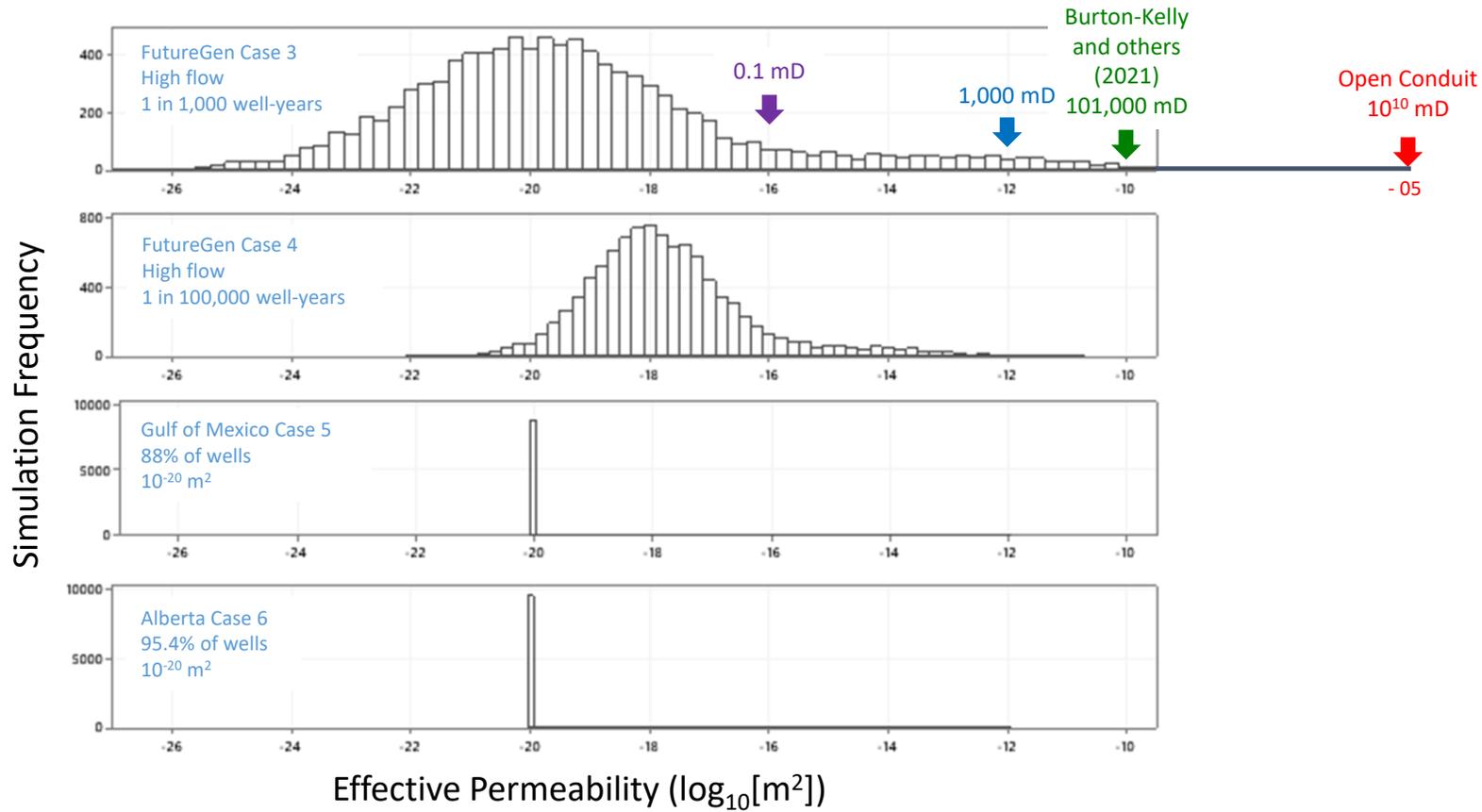


Figure. Histograms describing the expected frequency of leaky wellbore effective permeabilities under different scenarios. The ASLMA model used for AOR delineation used a value of approximately 0.1 mD. Constructed from data presented by Carey (2017).

Risk-Based AOR Results

Relating Pressure Buildup to Incremental Leakage with ASLMA Model and Compositional Simulation

Figure A-22 shows the relationship between the maximum pressure buildup in the storage reservoir and incremental leakage to Aquifer 3 (USDW) for the case without the leaky wellbore open to Aquifer 2 (thief zone). In the case where the leaky wellbore is closed to Aquifer 2, there is no incremental leakage to Aquifer 2. The curvilinear relationship between pressure buildup in the storage reservoir and incremental leakage to Aquifer 3 is used to predict the incremental leakage from the pressure buildup map produced by the compositional simulation of the geocellular model. The average simulated pressure buildup in the reservoir is represented by a raster (grid) map of pressure buildup values. For each raster value (grid cell map location), the relationship between pressure buildup and incremental leakage (Figure A-22) is used to predict incremental leakage using a linear interpolation between the points making up the curve. The cumulative leakage potential along a hypothetical leaky wellbore without injection occurring (i.e., leakage due to natural overpressure) is estimated to be 0.011 m³ over 20 years.

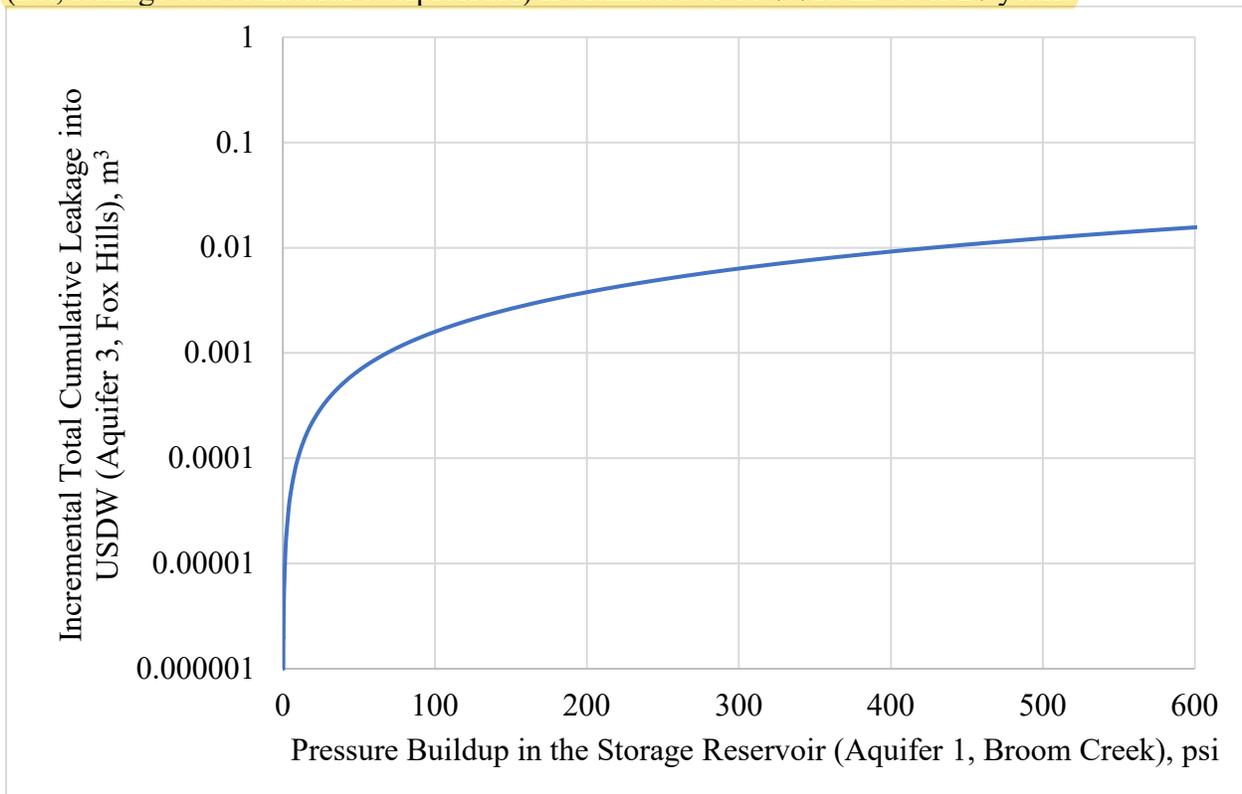


Figure A-22. Relationship between pressure buildup (x-axis, psi) in the storage reservoir (Aquifer 1, Broom Creek) and incremental total cumulative leakage (y-axis, m³) for Aquifer 3 (USDW, Fox Hills). In this scenario, the leaky wellbore is closed to Aquifer 2 (Inyan Kara).

Incremental Leakage Maps and AOR Delineation

The pressure buildup-incremental leakage relationship, shown in Figure A-22, results in the incremental leakage maps shown in Figure A-23, which show the estimated total cumulative incremental leakage potential from a hypothetical leaky well into Aquifer 3 (USDW) over the entire 20-year period.

The final step of the risk-based AOR workflow is to apply a threshold criterion to the incremental leakage maps to delineate a risk-based AOR. For the Broom Creek Formation injection at the Tundra SGS site, a threshold of 1 m³ of potential incremental flow into the Fox Hills Formation USDW along a hypothetical leaky wellbore over the 20-year injection period is established. A value of 1 m³ is the lowest meaningful value that can be produced by the ASLMA Model; although the model can return smaller values, they likely represent statistical noise. This potential incremental flow threshold is greater than all calculated potential incremental flow values described by the curve in Figure A-22. The maximum vertically averaged storage reservoir change in pressure at the end of the simulated injection period was 569 psi in the raster cell intersected by the injection well, which corresponds to less than 0.015 m³ of flow over 20 years. This pressure is below the potential incremental flow threshold of 1 m³. Therefore, the storage reservoir pressure buildup is not a deciding factor in determining the AOR extent.

The assumptions and calculations used to determine the risk-based AOR at Tundra SGS site incorporate at least four safety factors for the protection of groundwater resources. If the ASLMA model has resulted in an underestimation of the amount of potential leakage over the injection period, such underestimation is likely to be mitigated by:

- The statistical overestimation of hypothetical leaky wellbore permeability compared to known and estimated values in the literature—A more statistically likely hypothetical leaky wellbore permeability would be lower and allow less flow into the USDW.
- The lack of communication between the hypothetical leaky wellbore and Inyan Kara Formation, which would act as a thief zone—A real leaky wellbore would likely communicate with the Inyan Kara Formation, which would receive much, if not all, of the brine leaked from the storage reservoir.
- The low density of known legacy wellbores in the Tundra SGS area—CO₂ injection is proposed to occur in an area with few available leakage pathways.
- The continued overpressurized nature of the Broom Creek Formation with respect to overlying saline aquifers—over relatively short (e.g., 50-year) timescales, overpressurized aquifers with leakage pathways would demonstrate a change in upward flow rate and corresponding pressure (Oldenburg and others, 2016).

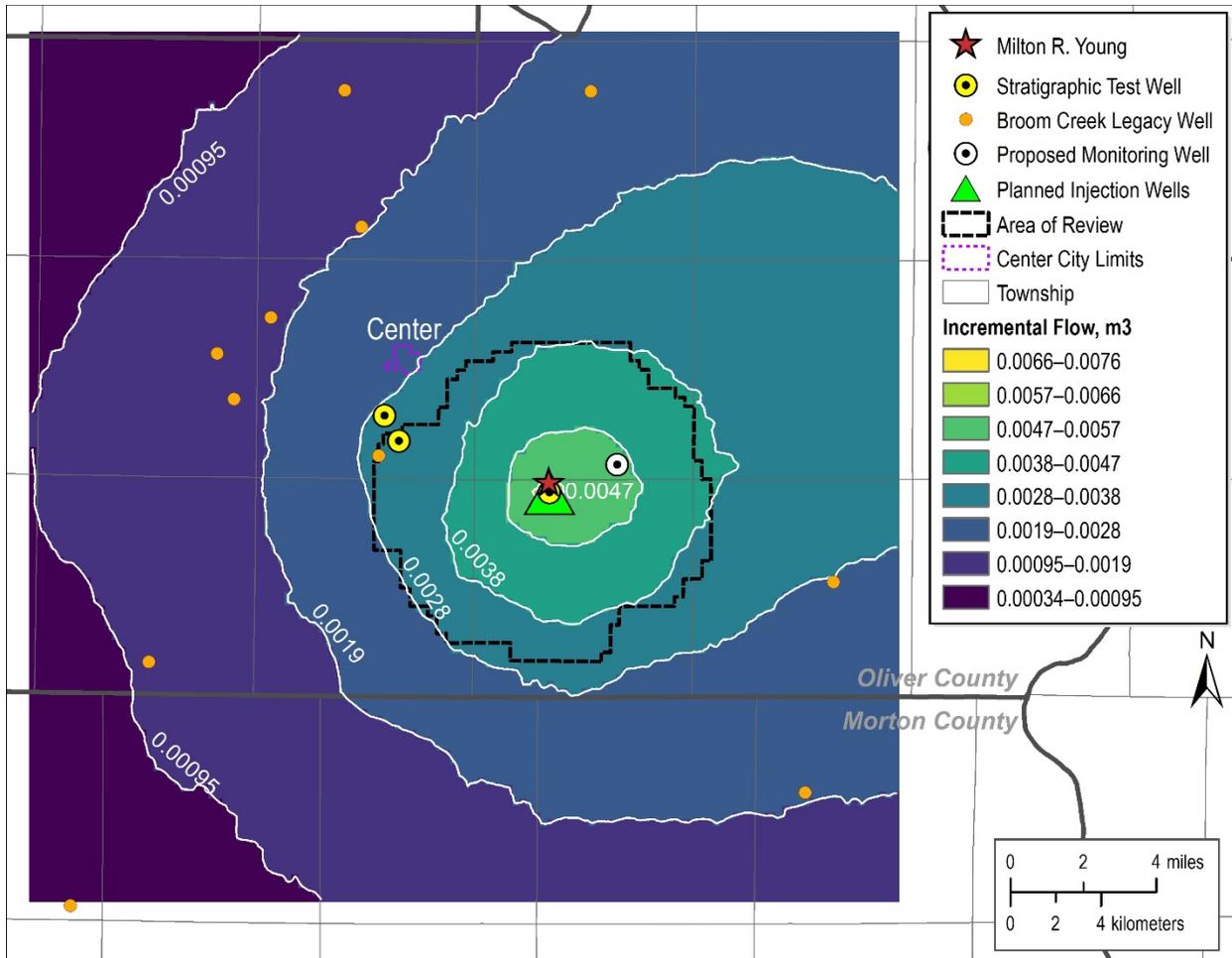
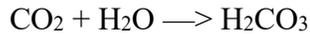


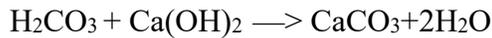
Figure. Incremental leakage potential map at the end of five years of CO₂ injection for the scenario where the leaky wellbore is closed to Aquifer 2 (thief zone). The dotted black polygon denotes the areal extent of the CO₂ plume in the storage reservoir plus 1-mile buffer at the end of 20 years of CO₂ injection as determined using a compositional simulator and the site-specific geologic model.

EFFECTS OF CO₂ ON PORTLAND CEMENT FORMULATIONS

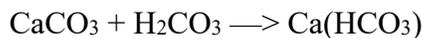
Portland cement (without modifying additive) can suffer corrosion damage by acidic fluids, including carbonic acid solutions formed by the combination of water and CO₂. When carbon dioxide dissolves in water, carbonic acid is formed.



Carbonic acid can then attack calcium hydroxide that is a major component present in cement compositions to form calcium carbonate through the following reaction:



This process of converting lime in the Portland cement is commonly referred to as 'carbonation of cement'. Carbonation of the cement reduces permeability and increases compressive strength. However, reactions continue between carbonic acid, free lime, and calcium carbonate. Continuous exposure of the cement to water and CO₂ or carbonic acid continues, and calcium carbonate can react with carbonic acid to produce water-soluble calcium bicarbonate through the following reaction:



These reactions and process opens channels for further carbonic acid propagation into cement mass and further corrosion of the cement. Over time, materials soluble in the flow stream are dissolved leaving a friable, porous, permeable framework of insoluble silica, alumina, silicates and aluminosilicates.

4.1.7 Near-Surface (groundwater and soil gas)-Monitoring Plan

Prior to injection operations, Minnkota will drill and construct a dedicated groundwater-monitoring well in the Fox Hills Formation (i.e., deepest USDW) at the Liberty-1 (J-ROC1 File No. 37672) CO₂ injection wellsite (Figure 4-4). Baseline Fox Hills Formation water samples will be collected from this monitoring well over a 1-year period prior to CO₂ injection, with the goal of securing these samples during each of the four seasons (spring, summer, fall, and winter). Minnkota plans to monitor the vadose zone by installing three soil gas profile stations: one each near the wellsites of the Liberty-1 (J-ROC1 File No. 37672) CO₂ injection, NRDT-1 deep monitoring well pads (Figure 4-4), and the Herbert Dresser (File No. 4937) wellsite. The soil-gas profile stations will be installed 1 year prior to injection to secure samples during the four seasons. Minnkota will select a subset of existing groundwater wells, as outlined above, within the AOR boundary for periodic monitoring during CO₂ injection operations and postinjection monitoring (see Figure 4-4).

During the first 3 years of CO₂ injection activities, the Fox Hills Formation monitoring well, soil gas profile stations (near the Liberty-1 [J-ROC1 File No. 37672] CO₂ injection, NRDT-1 deep monitoring wellsites, and Herbert Dresser [File No. 4937] wellsite), and select groundwater wells within the AOR will be sampled on an annual basis. All laboratory results will be filed with NDIC and state water commission. If the results show no significant changes to water chemistry, the well-sampling frequency will be reduced to one sample every 5 years starting at Year 5 of the injection operations for all previously monitored wells.

As the areal extent of the CO₂ plume increases, monitoring of additional groundwater wells within the AOR will be phased in over time based on monitoring of the CO₂ plume in the injection zone. Each additional well will be sampled annually for 3 years. If the results show no significant changes to the water chemistry, the sampling frequency will be reduced to one sample at a 2-year interval and then at 5-year intervals thereafter. A detailed near-surface monitoring plan is presented in Table 4-6, including the frequency and duration of the sampling during each phase (i.e., preinjection, operational, and postoperational) of the geologic CO₂ storage project.

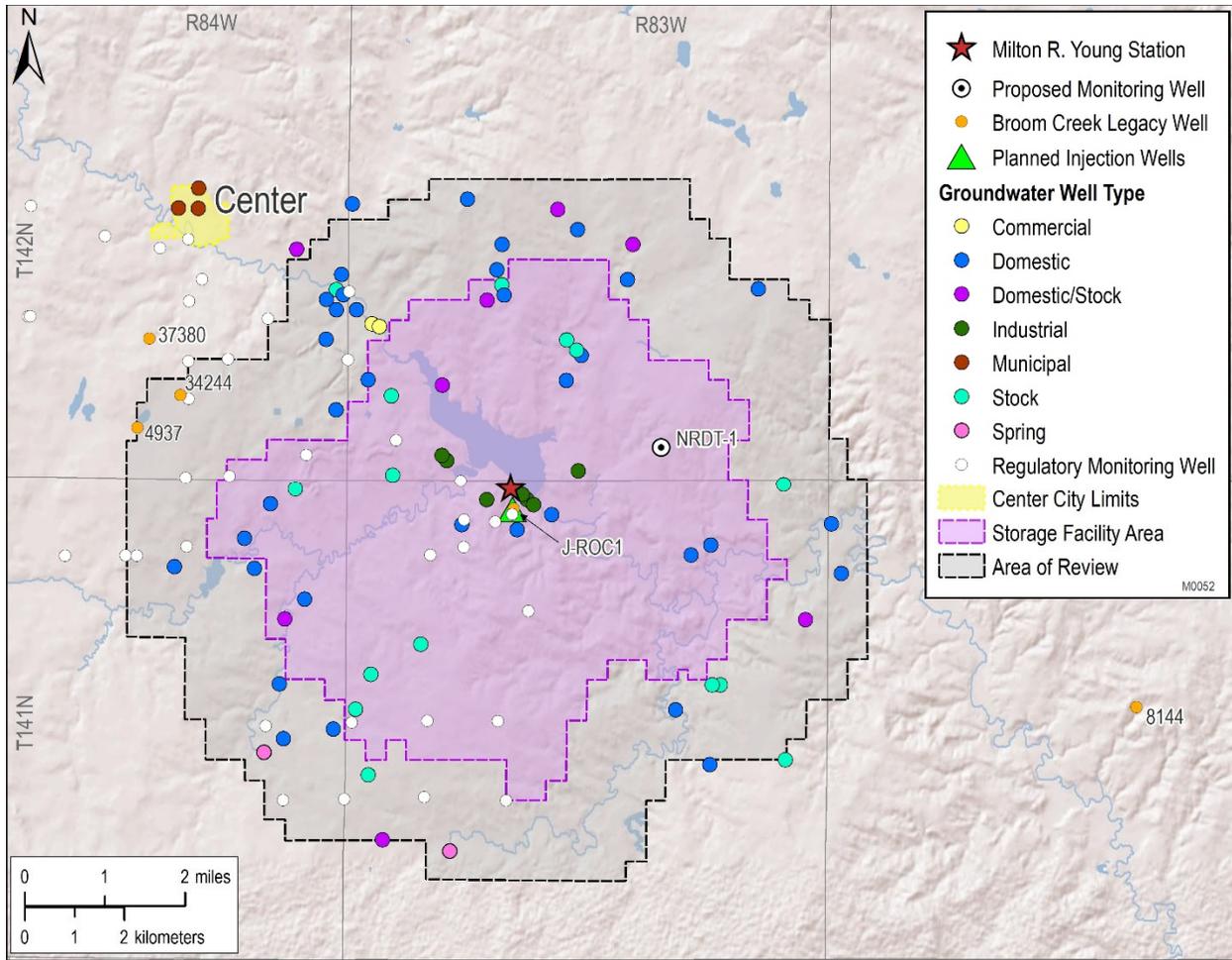


Figure 3-3. AOR map in relation to nearby legacy wells and groundwater wells. Shown are the storage facility area and AOR boundaries.

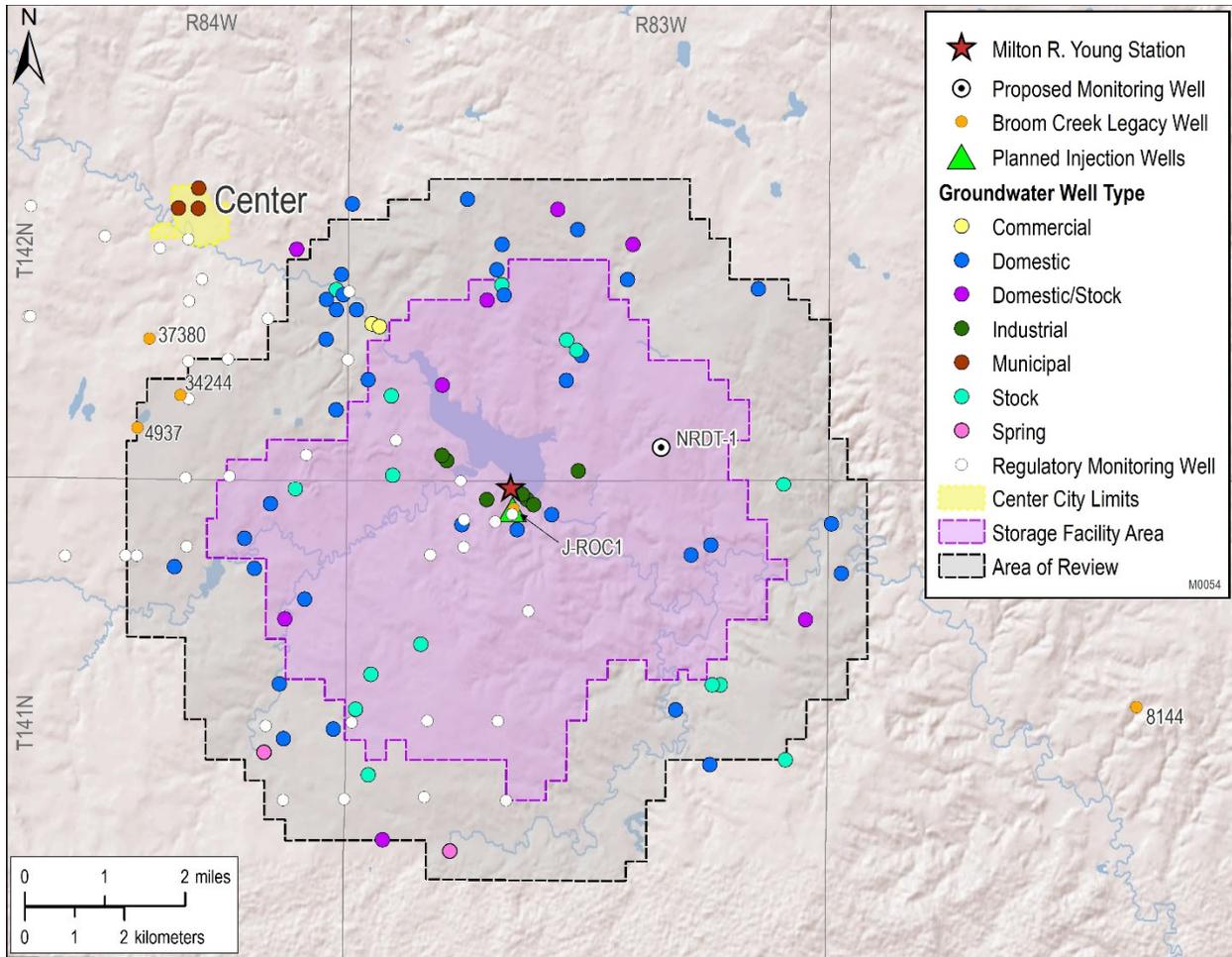


Figure 3-13. Map of water wells in the AOR in relation to the project facility, Liberty-1 (JROC1 NDIC File No. 37672) and Unity-1 planned injection wells, the NRDT-1 proposed monitoring well, facility area, AOR, and legacy oil and gas wells.

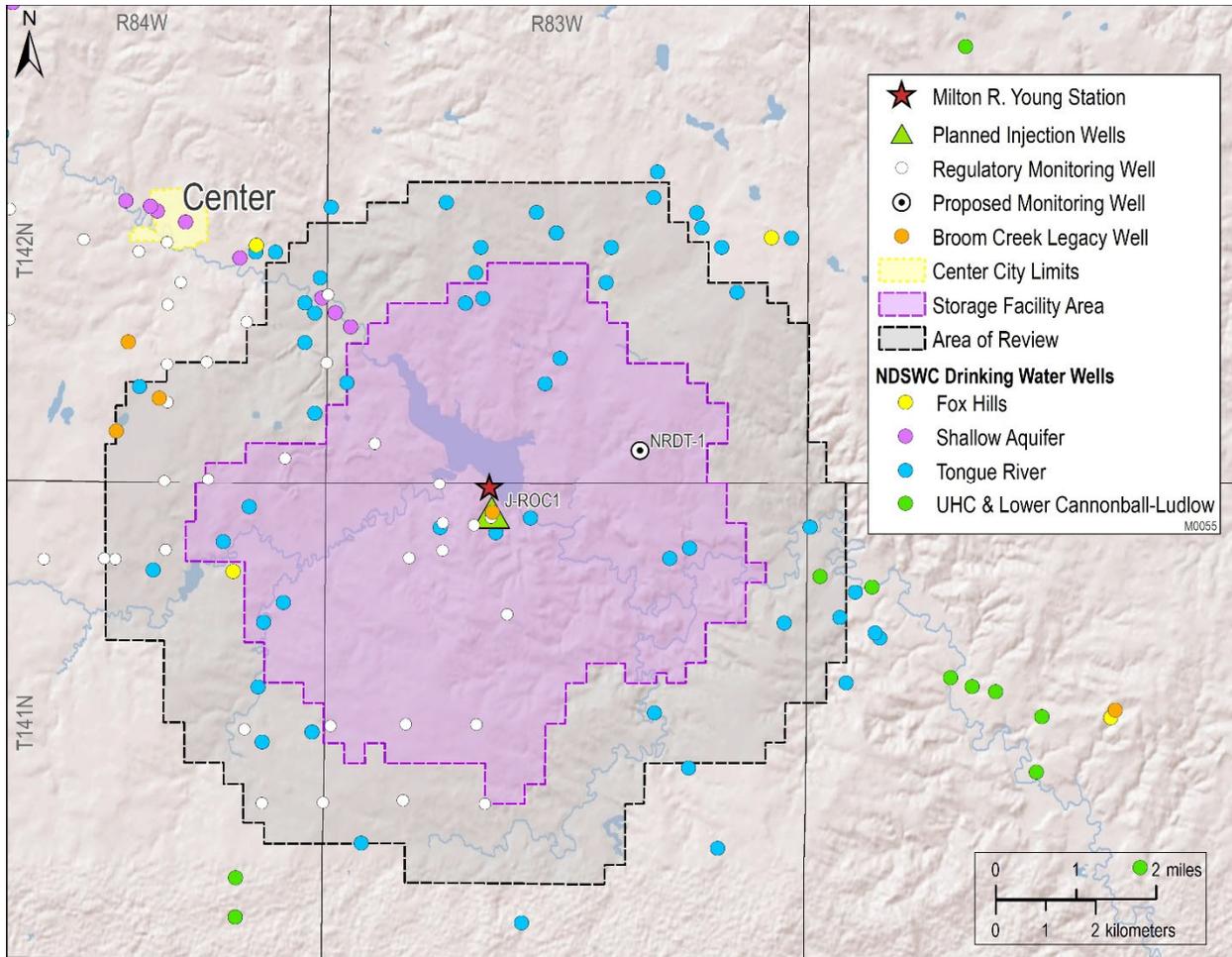
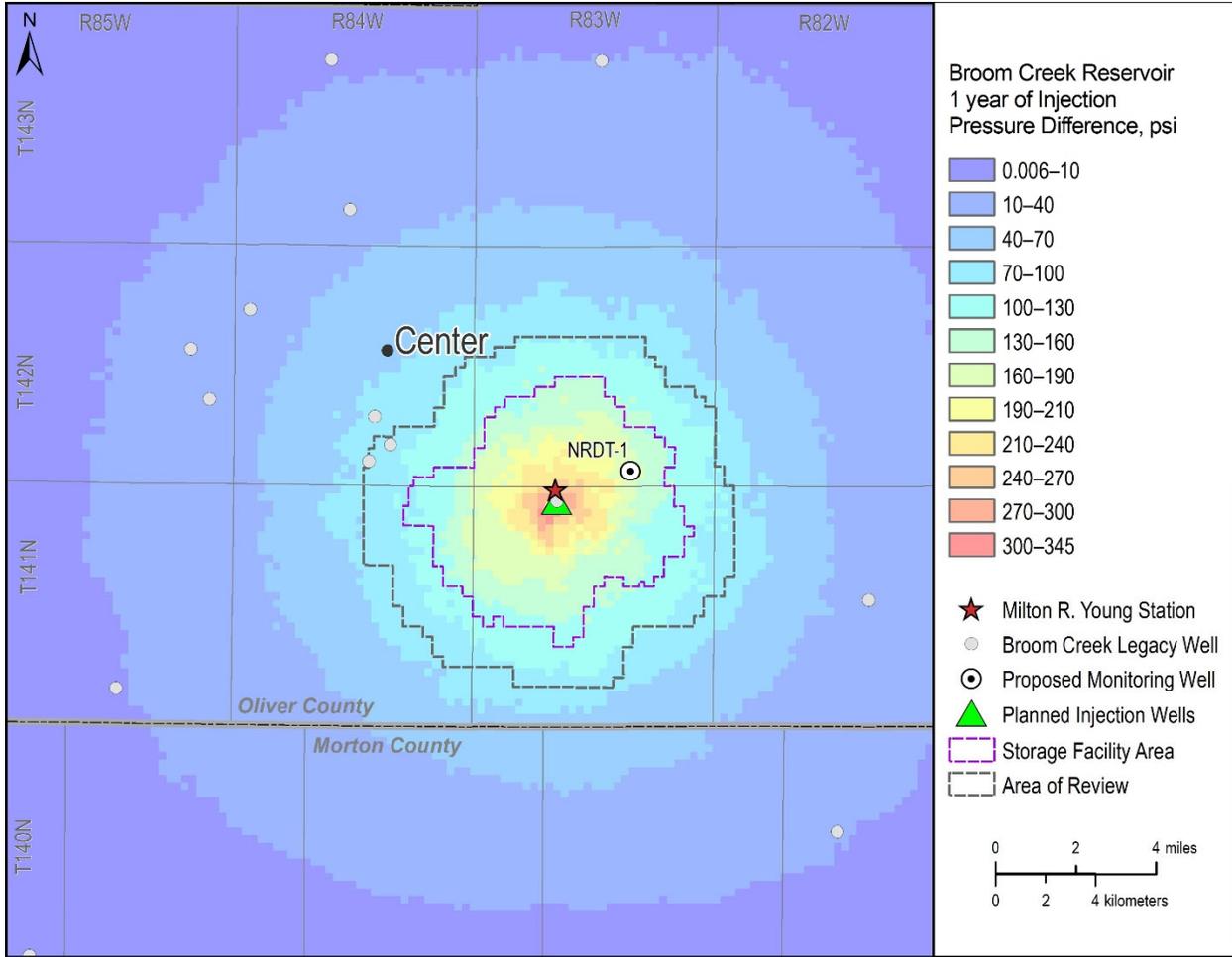
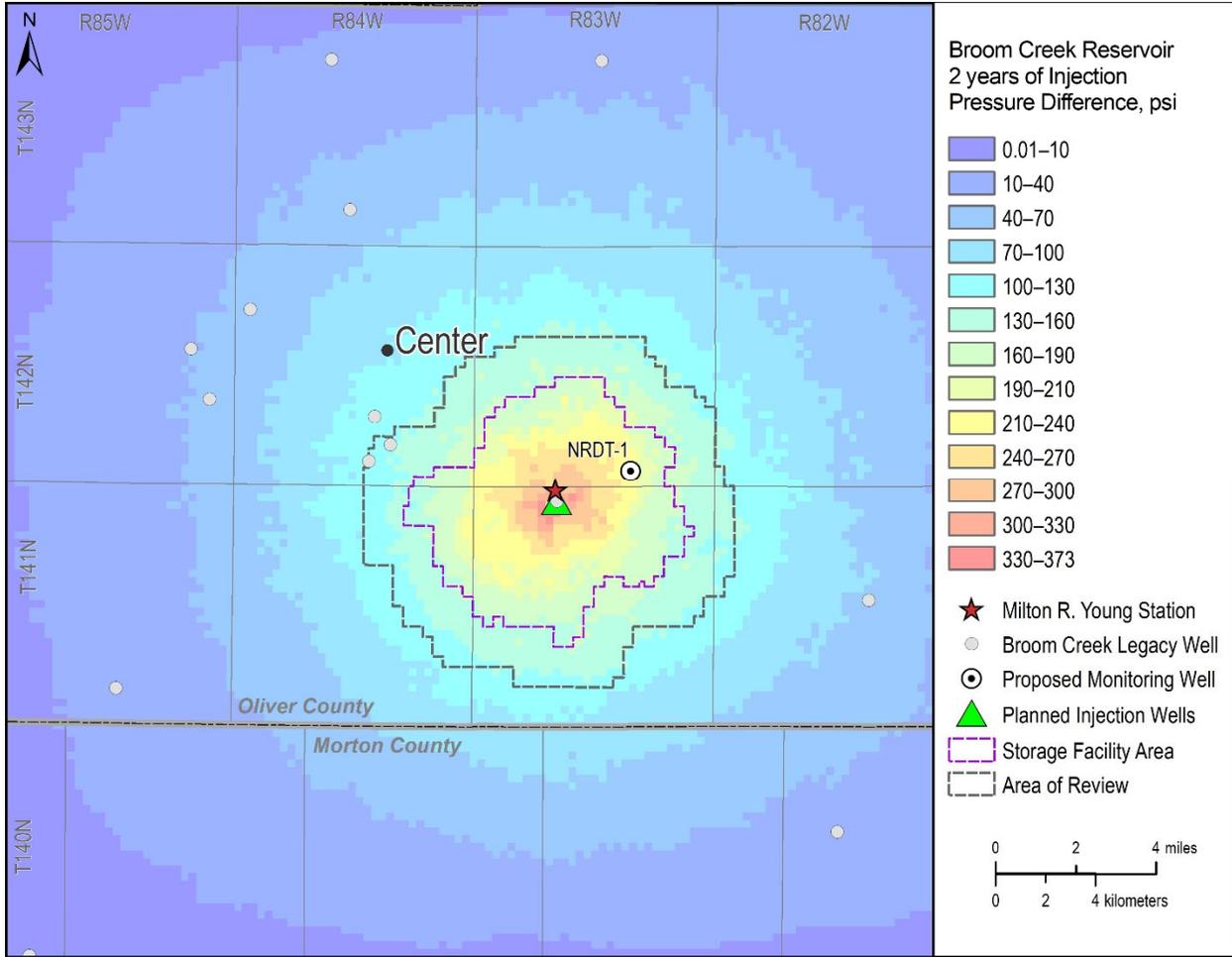
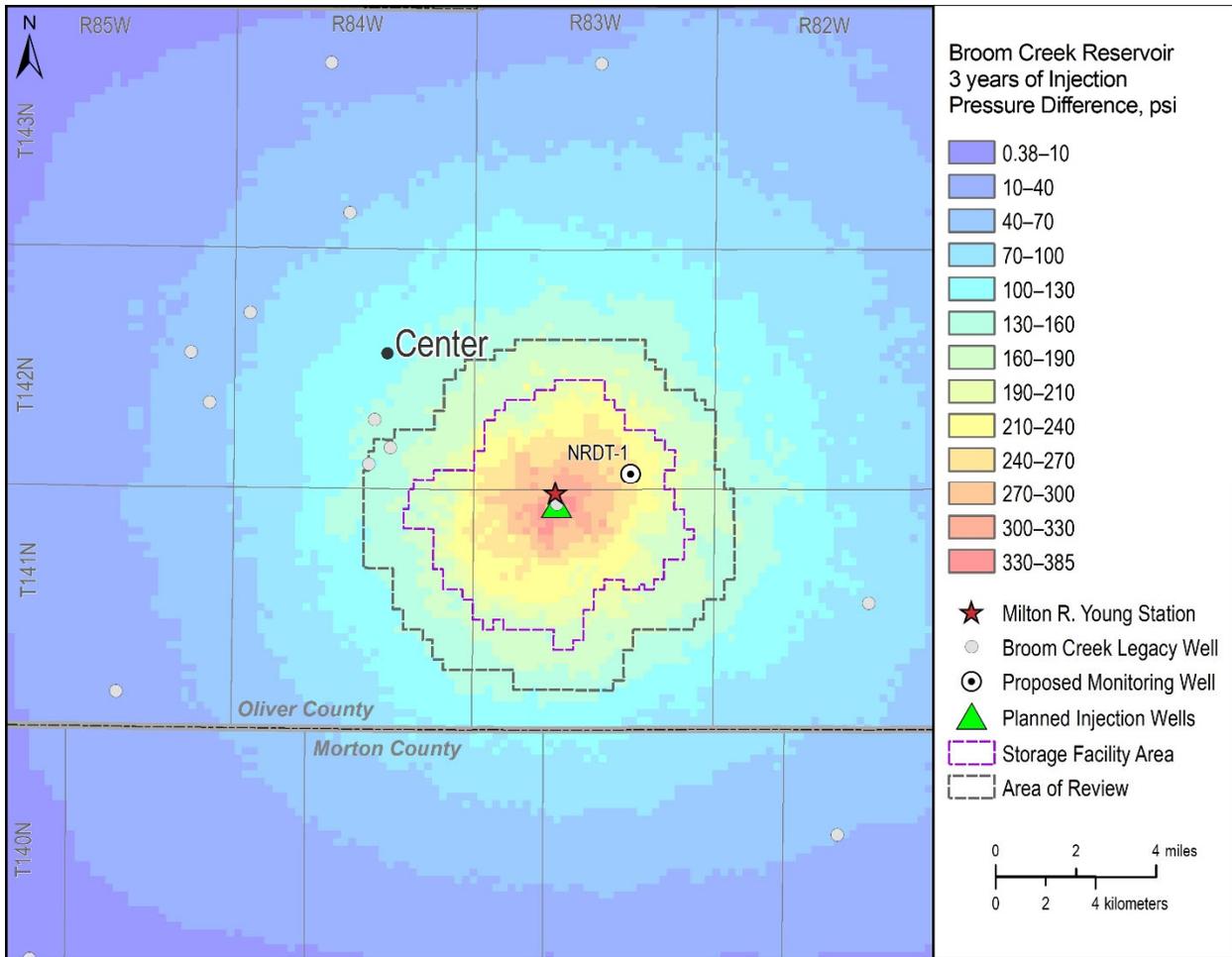
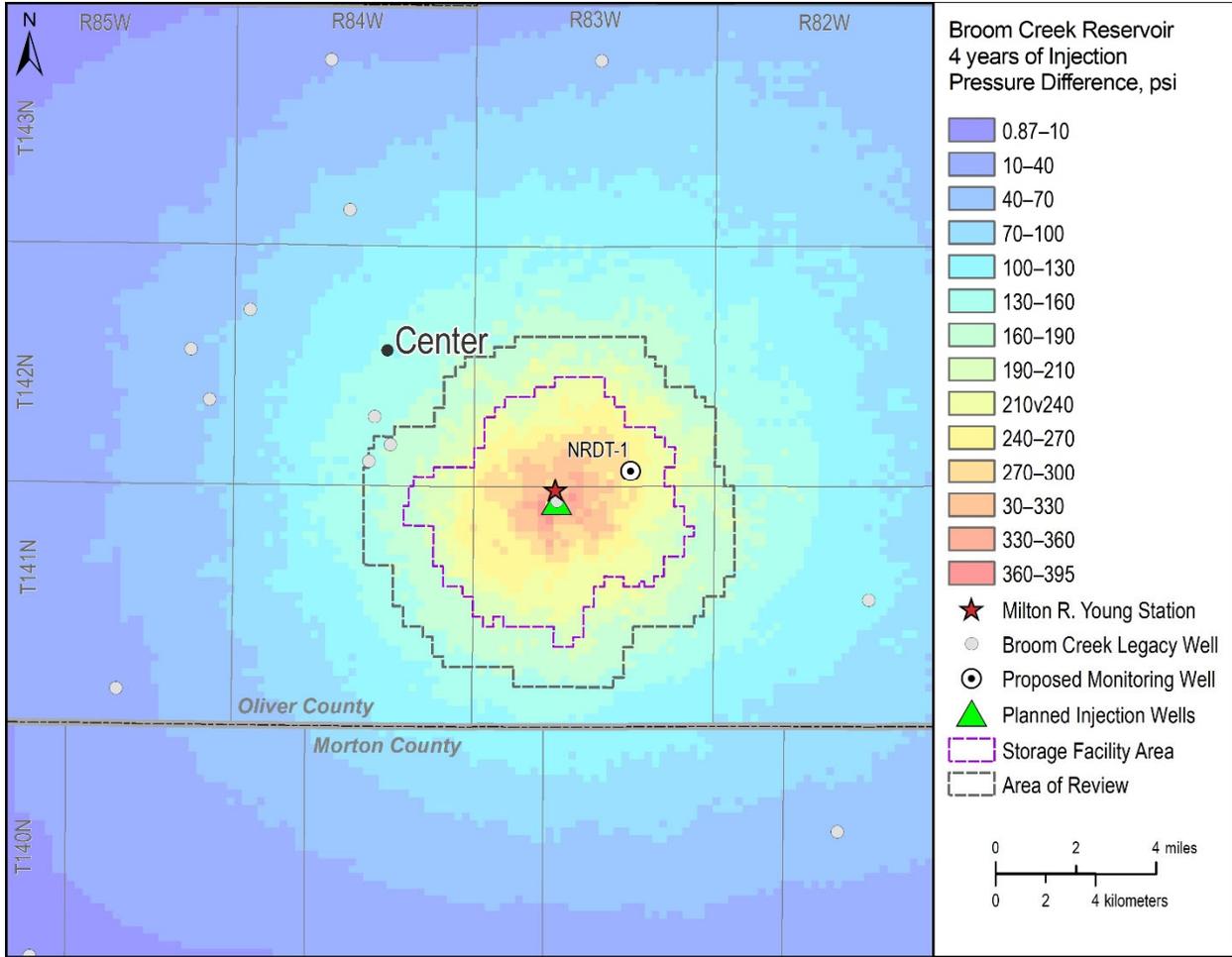


Figure 4-1. Minnkota will carry out an initial sampling program for the near-surface groundwater wells. Shown are existing monitoring wells to be used for the baseline; all wells listed for drinking water in the NDSWC database by aquifer; location of all plugged and abandoned legacy oil and gas exploratory wells; city of Center, North Dakota; Milton R. Young Station (MRYS); and Liberty-1 (J-ROC1 File No. 37672) and Unity-1 proposed injectors, and NRD-1 (proposed monitoring well) in relation to the storage facility area and AOR. The well drilled for baseline characterization and monitoring of the Fox Hills Formation will be located at the injection wellsite.









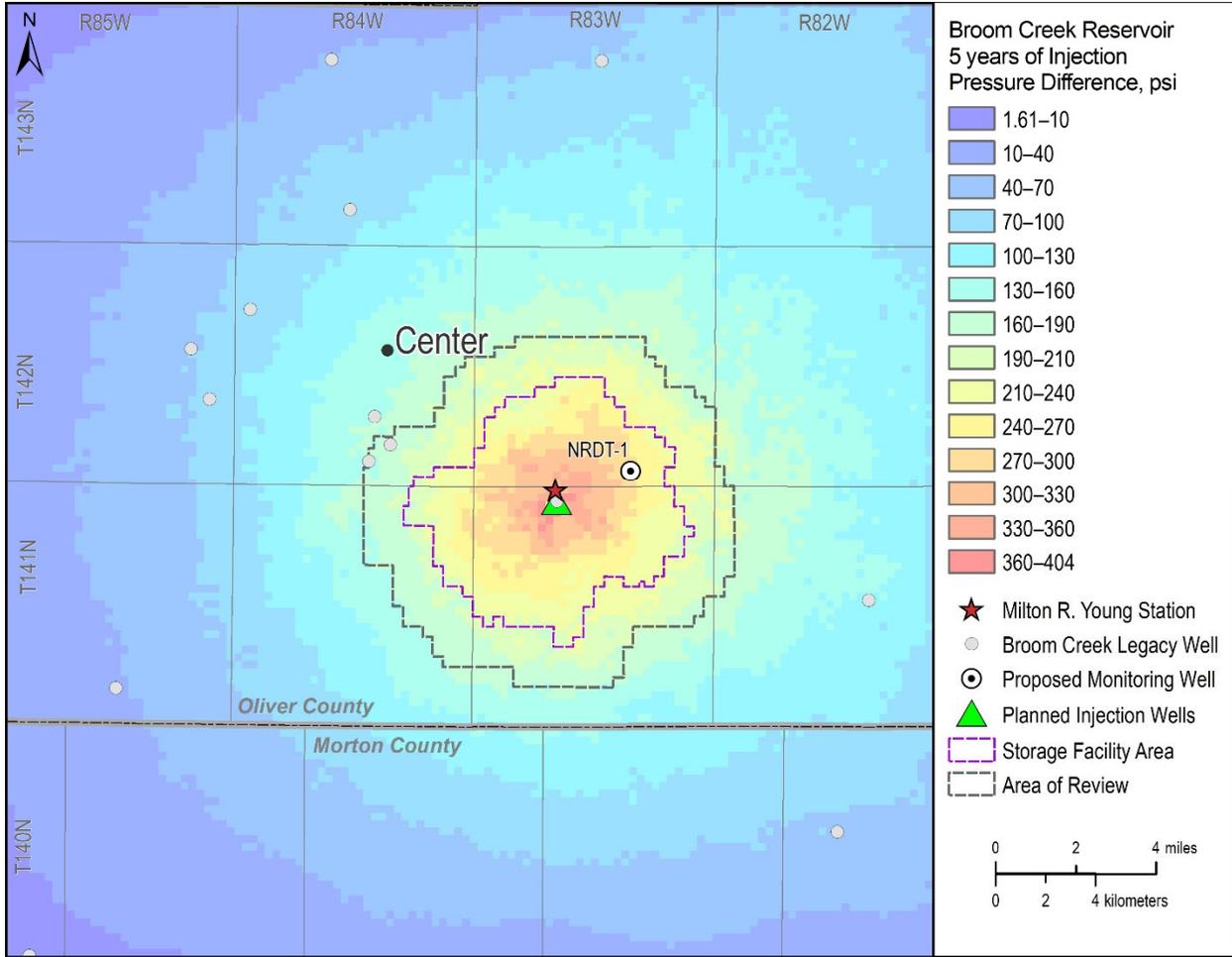


Table 4-5. Baseline Groundwater Data

Parameter		Total Dissolved Solids, mg/L*			pH			Specific Conductance, μ S/cm			Alkalinity as CaCO ₃ , mg/L		
BNI Well No.	Depth, ft	July 2018	July 2019	July 2020	July 2018	July 2019	July 2020	July 2018	July 2019	July 2020	July 2018	July 2019	July 2020
322A	21	525	726	532	6.19	6.6	6.6	801	980	832	118	124	165
324	88	360	817	745	7.8	7.8	7.8	649	1,193	1,182	188	345	369
363	82	1,440	1,500	1,550	8.3	8.3	8.2	2,446	2,460	2,454	1,090	1,110	1,200
C1-1	129	706	699	698	8.4	8.4	8.4	1,151	1,123	1,168	454	480	526
C7-1	184	1,410	1,480	1,490	8.5	8.4	8.2	2,105	2,098	2,096	985	1,050	1,120
C9-1	163	1,520	1,610	1,430	8.2	8.3	8.3	2,029	2,032	2,012	968	1,030	1,080
MRYS Well No.	Depth, ft	May 2019	Sept. 2019	April 2020	May 2019	Sept. 2019	April 2020	May 2019	Sept. 2019	April 2020	May 2019	Sept. 2019	April 2020
92-5A	185	800	790	780	8.75	8.9	8.94	1,131	1,184	1,129	488	520	499
92-6A	150	1,180	1,180	1,150	8.43	8.87	8.67	1,697	1,744	1,642	641	690	632
92-3	155	1,270	1,280	1,280	8.32	8.65	8.66	1,812	1,887	1,841	823	910	837
95-4	145	1,260	1,260	1,260	8.31	8.55	8.53	1,797	1,862	1,815	829	880	836
97-1	67	2,740	2,900	2,410	6.3	6.26	6.33	3,736	3,485	3,597	284	310	327
USGS Well No.	Depth, ft	January 2021			January 2021			January 2021			January 2021		
10	1,290	1,520			8.42			2,641			938		

* Calculation. For MRYS wells, calculated on reported field electrical conductivity.

1) hydrostatic conditions, 2) initially linearly densities in the borehole, and 3) constant density once the injection zone fluid is lifted to the top of the borehole (i.e., uniform density approach):

$$\Delta P_c = \frac{1}{2} g \xi (Z_u - Z_i)^2 \quad [\text{Eq. 2}]$$

Where ξ is a linear coefficient determined by:

$$\xi = \frac{\rho_i - \rho_u}{Z_u - Z_i} \quad [\text{Eq. 3}]$$

Where:

ΔP_c is the critical threshold pressure increase (Pa).

g is the acceleration of gravity (m/s^2).

z_u is the elevation of the base of the lowermost USDW (m amsl).

z_i is the elevation of the top of the injections zone (m amsl).

ρ_i is the fluid density in the injection zone (kg/m^3).

ρ_u is the fluid density in the USDW (kg/m^3).

Risk-Based AOR Delineation

The methods described by EPA (2013) for estimating the AOR under the Class VI Rule were developed assuming that the storage reservoirs would be in hydrostatic equilibrium with overlying aquifers. However, in the state of North Dakota, and potentially elsewhere around the United States, candidate storage reservoirs are already overpressurized relative to overlying aquifers and thus subject to potential vertical formation fluid migration from the storage reservoir to the lowermost USDW even prior to the planned storage project. Consequently, applying EPA (2013) methods to these geological situations essentially results in an infinite AOR, which makes regulatory compliance infeasible.

Several researchers have recognized the need for alternative methods for estimating the AOR for locations that are already overpressurized relative to overlying aquifers. For example, Birkholzer and others (2014) described the unnecessary conservatism in EPA's definition of critical pressure, which could lead to a heavy burden on storage facility permit applicants. As an alternative, [Burton-Kelly and others \(2021\)](#) proposed a risk-based reinterpretation of this framework that would allow for a reduction in the AOR while ensuring protection of drinking water resources.

A computational framework for estimating a risk-based AOR was proposed by Oldenburg and others. (2014, 2016), who compared formation fluid leakage through a hypothetical open flow path in the baseline scenario (no CO₂ injection) to the incrementally larger leakage that would occur in the CO₂ injection case. The modeling for the risk-based AOR used semianalytical solutions to single-phase flow equations to model reservoir pressurization and vertical migration through leaky wells. These semianalytical solutions were extensions of earlier work for formation fluid leakage through abandoned wellbores by Raven and others (1990) and Avcı (1994), which were creatively solved, coded, and compiled in FORTRAN under the name, ASLMA (Analytical Solution for Leakage in Multilayered Aquifers) and extensively described in Cihan and others. (2011, 2012) (hereafter "ASLMA Model").

Recently, White and others (2020) outlined a similar risk-based approach for evaluating the AOR using the National Risk Assessment Partnership (NRAP) Integrated Assessment Model for Carbon Storage (NRAP-IAM-CS). However, the NRAP-IAM-CS and subsequent open-sourced version (NRAP-Open-IAM) are constrained to the assumption that the storage reservoir is in hydrostatic equilibrium with overlying aquifers and, therefore, may not accurately estimate the AOR for storage projects located in regions where the storage reservoir is overpressurized relative to overlying aquifers.

Building a geologic model in a commercial-grade software platform (like Schlumberger Petrel) and running fluid flow simulations using numerical reservoir simulation in a commercial-grade software platform (like CMG's compositional simulator, GEM), provide the "gold standard" for estimating pressure buildup in response to CO₂ injection (e.g., Bosshart and others, 2018). However, these numerical reservoir simulations are typically limited to the storage reservoir and primary seal formation (cap rock) and do not include the geologic units overlying the cap rock because of the computational burden of conducting such a complex simulation. In addition, geologic modeling of the overlying units may add a substantial amount of time and effort during prefeasibility-phase projects that is unwarranted given the amount of uncertainty that may be present if only few nearby wells can be used for characterization activities. Earlier studies (e.g., Nicot and others, 2008; Birkholzer and others, 2009; Bandilla and others, 2012; Cihan and others, 2011, 2012) have shown that far-field fluid pressure changes outside of the CO₂ plume domain can be reasonably well described by a single-phase flow calculation by representing CO₂ injection as an equivalent-volume injection of brine (Oldenburg and others, 2014).

The semianalytical solutions embedded within the ASLMA Model have been shown to compare with the numerical model, TOUGH2-ECO2-N, and provided accurate results for pressures beyond the CO₂ plume zone (Birkholzer and others, 2009; Cihan and others, 2011, 2012). Therefore, the proposed workflow for delineating a risk-based AOR uses the ASLMA Model to examine pressure buildup in the storage reservoir and resultant effects of this buildup on the vertical migration of formation fluid via (single) hypothetical leaky wellbores located at progressively greater distances from the injection well (Figure A-21).

An important distinction between EPA Methods 1 and 2, which both calculate a critical pressure threshold (either ΔP_{if} for Method 1 or ΔP_c for Method 2) and the risk-based AOR approach is that the risk-based approach 1) calculates and maps the potential incremental flow of formation fluids from the storage reservoir to the USDW that could occur and then 2) delineates the areal extent beyond which no significant leakage would occur. Therefore, the region beyond which no significant leakage would occur does not present an endangerment to the USDW; hence, the region inside of this areal extent is the risk-based AOR.

Complete details of the risk-based AOR model are found in [Burton-Kelly and others \(2021\)](#). Inputs, assumptions, and results are discussed in the current document.

Table A-4. EPA Method 1 Critical Threshold Pressure Increase Calculated at the J-ROC1 Wellbore Location

Depth*		P _i Injection Zone Pressure MPa	P _u USDW Pressure MPa	ρ _i Injection Zone Density kg/m ³	Z _u USDW Base Elevation m amsl	Z _i Reservoir Elevation m amsl	ΔP _{i,f} Threshold Pressure Increase MPa psi	
4,740	1,445	15.919	3.535	1,024	266	-828	-1.391	-201
4,857	1,480	16.312	3.535	1,024	266	-864	-1.430	-207
4,974	1,516	16.705	3.535	1,023	266	-900	-1.470	-213

* Chosen depths represent the top, middle, and base of the Broom Creek Formation at J-ROC1. Ground surface elevation is 609 m above mean sea level.

In accordance with EPA (2013) guidance, the combination of a) Method 1 negative ΔP_{i,f} value across the Tundra SGS area and b) lack of evidence for hydrostatic equilibrium between the reservoir and the USDW (i.e., Method 2 does not apply) indicates that a risk-based approach to AOR delineation may be pursued.

Risk-Based AOR Calculations

Complete details of the risk-based AOR model are found in [Burton-Kelly and others \(2021\)](#). The inputs, assumptions, and results discussed here provide the necessary details for reproducing and verifying the results. A macro-enabled Microsoft Excel file was used to define the inputs and calculations that were employed used in the method (hereafter “ASLMA Workbook”).

Initial Hydraulic Heads

The original ASLMA Model (Cihan and others, 2011) initially assumed hydrostatic pressure distributions in the entire system. The current work uses a modified version of the ASLMA Model to simulate pressure perturbations and leakage rates when there are initial head differences in the aquifers (Oldenburg and others, 2014). The initial hydraulic heads are calculated assuming an equivalent freshwater head based on the unit-specific elevations and pressures. The equivalent freshwater heads are entered into the ASLMA Model and establish the initial pressure conditions for the storage complex prior to CO₂ injection.

For example, the initial reference case equivalent freshwater heads for the storage reservoir (Aquifer 1), thief zone (Aquifer 2), and USDW (Aquifer 3) are 802, 557, and 619 m, respectively, which illustrate the state of overpressure in the storage complex, as Aquifer 1 has a greater initial hydraulic head than Aquifers 2 and 3. Therefore, the storage complex requires different treatment than the default AOR calculations described by EPA (2013). Details on the calculations of initial hydraulic head are provided in [Burton-Kelly and others \(2021\)](#).

CO₂ Injection Parameters

Tundra SGS has a Broom Creek CO₂ injection rate target of 3.5 million metric tons per year (MMtpa) for 20 years. A single injector is placed at the center of the ASLMA model grid at an x,y-location of (0,0) in the coordinate reference system. The ASLMA Model requires the CO₂ injection rate to be converted into an equivalent-volume injection of formation fluid

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Directional Trajectory Unity-1 (CO₂ Injector Well)

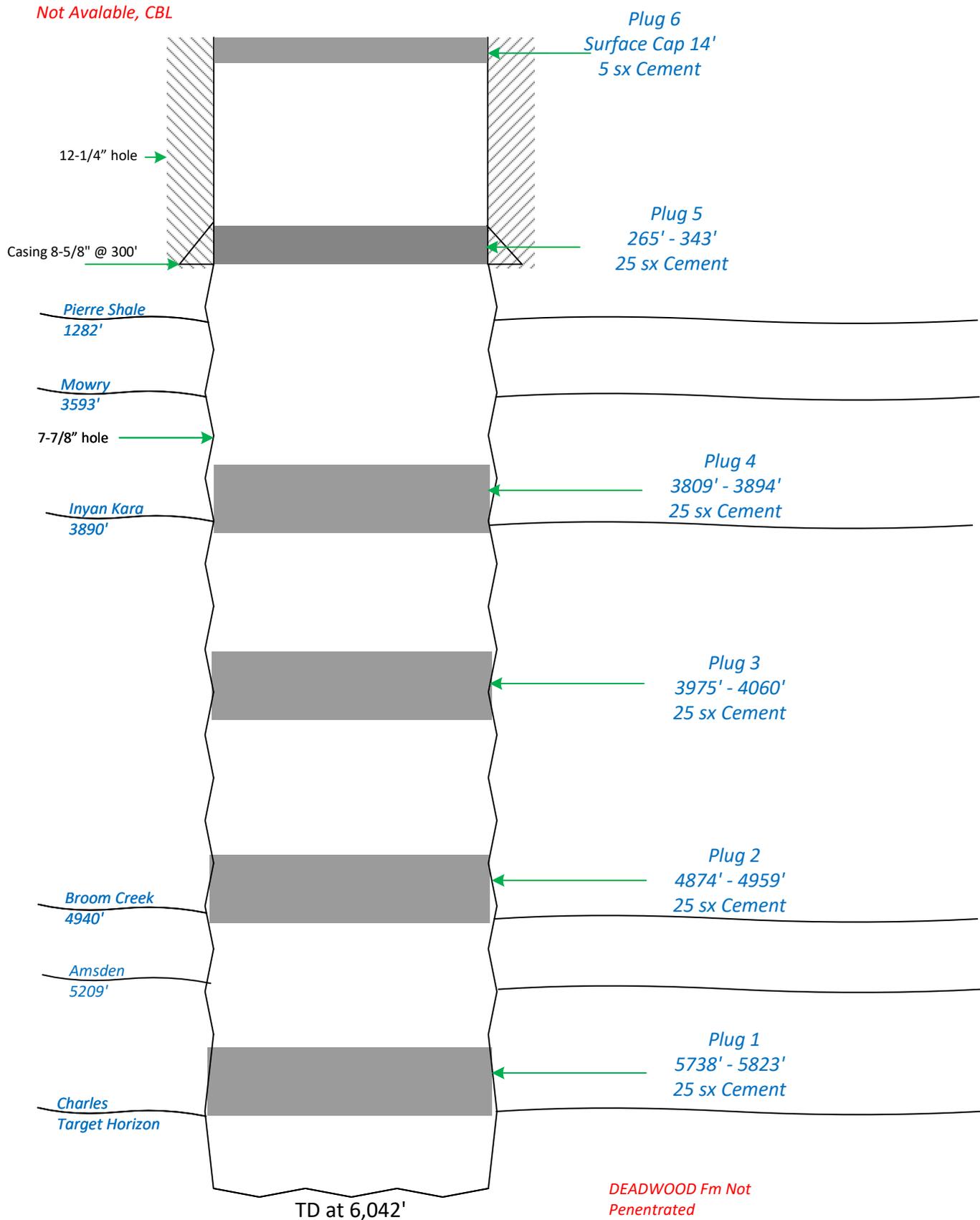
MD (ft)	CL (ft)	Inc (°)	Azi (°)	TVD (ft)	NS (ft)	EW (ft)	V.Sec (ft)	Dogleg (°/100ft)	T.Face (°)	Build (°/100ft)	Turn (°/100ft)
0.00		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2000.00	2000.00	0.00	0.00	2000.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3997.88	1997.88	27.97	180.00	3919.47	-478.05	0.00	478.05	1.40	180.00	1.40	0.00
5447.77	1449.90	27.97	180.00	5200.00	-1158.07	0.00	1158.07	0.00	0.00	0.00	0.00
5617.61	169.84	27.97	180.00	5350.00	-1237.73	0.00	1237.73	0.00	0.00	0.00	0.00

MD (ft)	Incl (deg)	Azimuth (deg)	TVD (ft)	N/S	E/W
0	0.0	0	0.00	-0.01	0
100	0.0	0	100.00	-0.01	0
200	0.0	0	200.00	-0.01	0
300	0.0	0	300.00	-0.01	0
400	0.0	0	400.00	-0.01	0
500	0.0	0	500.00	-0.01	0
600	0.0	0	600.00	-0.01	0
700	0.0	0	700.00	-0.01	0
800	0.0	0	800.00	-0.01	0
900	0.0	0	900.00	-0.01	0
1000	0.0	0	1000.00	-0.01	0
1100	0.0	0	1100.00	-0.01	0
1200	0.0	0	1200.00	-0.01	0
1300	0.0	0	1300.00	-0.01	0
1400	0.0	0	1400.00	-0.01	0
1500	0.0	0	1500.00	-0.01	0
1600	0.0	0	1600.00	-0.01	0
1700	0.0	0	1700.00	-0.01	0
1800	0.0	0	1800.00	-0.01	0
1900	0.0	0	1900.00	-0.01	0
2000	0.0	0	2000.00	-0.01	0
2100	1.4	180	2099.99	-1.23	0
2200	2.8	180	2199.92	-4.89	0
2300	4.2	180	2299.73	-11.00	0
2400	5.6	180	2399.36	-19.54	0
2500	7.0	180	2498.76	-30.51	0
2600	8.4	180	2597.85	-43.91	0
2700	9.8	180	2696.59	-59.73	0
2800	11.2	180	2794.91	-77.95	0
2900	12.6	180	2892.76	-98.57	0
3000	14.0	180	2990.08	-121.57	0
3100	15.4	180	3086.80	-146.95	0
3200	16.8	180	3182.88	-174.68	0
3300	18.2	180	3278.25	-204.75	0
3400	19.6	180	3372.85	-237.14	0
3500	21.0	180	3466.64	-271.83	0
3600	22.4	180	3559.55	-308.81	0
3700	23.8	180	3651.53	-348.04	0
3800	25.2	180	3742.53	-389.51	0
3900	26.6	180	3832.48	-433.19	0
3998	28.0	180	3919.47	-478.05	0
4000	28.0	180	3921.34	-479.05	0
4100	28.0	180	4009.66	-525.95	0

MD (ft)	Incl (deg)	Azimuth (deg)	TVD (ft)	N/S	E/W
4200	28.0	180	4097.98	-572.85	0
4300	28.0	180	4186.30	-619.75	0
4400	28.0	180	4274.62	-666.65	0
4500	28.0	180	4362.93	-713.56	0
4600	28.0	180	4451.25	-760.46	0
4700	28.0	180	4539.57	-807.36	0
4800	28.0	180	4627.89	-854.26	0
4900	28.0	180	4716.21	-901.16	0
5000	28.0	180	4804.53	-948.06	0
5100	28.0	180	4892.85	-994.96	0
5200	28.0	180	4981.17	-1041.87	0
5300	28.0	180	5069.49	-1088.77	0
5400	28.0	180	5157.81	-1135.67	0
5448	28.0	180	5200.00	-1158.08	0
5500	28.0	180	5246.12	-1182.57	0
5600	28.0	180	5334.44	-1229.47	0
5618	28.0	180	5350.00	-1237.73	0

HERBERT DRESSER 1-34

NDIC Well File No. 4937



Note:
* Assumed class G cement was used for the cement plug
* Cement yield is 1.15 cuft/sack, all plugs has the same yield value

Not to scale

Well Name: Herbert Dresser 1-34 (NDIC File No. 4937)

Cement Plugs				
Number	Interval (ft)		Thickness (ft)	Volume (sacks)
1	5,823	5,738	85	25
2	4,959	4,874	85	25
3	4,060	3,975	85	25
4	3,894	3,809	85	25
5	343	265	78	25
6	14	4	10	5

Formation		Cement Plug Remarks
Name	Estimated Top (ft)	
8 7/8" Casing Shoe	300	Cement plug 5 isolates the 8 7/8" casing shoe with 43' and 35' cement below and above the casing shoe, respectively
Pierre	1,282	
Greenhorn	3,223	
Mowry	3,593	Cement plug 4 isolates the Inyan Kara Formation with 4' within the Inyan Kara and 81' within the Mowry
Inyan Kara	3,890	
Swift	4,105	Cement plug 2 isolates the Broom Creek Formation with 19' within the Broom Creek and 65' within the Opeche
Broom Creek	4,940	
Amsden	5,209	

Spud Date: 8/25/1970
Total Depth: 6042 (Charles Formation)

Surface Casing:
8 7/8" 36# K-55 casing set at 300', cement to surface with 225 sacks Class G cement.

Openhole plugging

Corrective Action: No corrective action is necessary. (Placeholders add explanation based on modeling and simulations result)

Stage	Risk	Description	Severity	Likelihood	Monitoring	Control in Place	Potential Response Actions	Response Personnel
Construction Period	Well control event while drilling or completing the well with loss of containment.	This event could occur during drilling and completion operations if the hydrostatic column controlling the well decreases below the formation pressure, allowing fluids to enter the well suddenly.	Serious	Unlikely	<ul style="list-style-type: none"> * Flow sensor. * Pressure sensor. * Tank level indicator. * Tripping displacement practices. * Mud weight control. 	<ul style="list-style-type: none"> * Blowout prevention (BOP) equipment. * Kill fluid. * Well control training. * BOP testing protocol. * Kick drill. * Lubricators for wireline operations. 	<p>Drilling:</p> <ul style="list-style-type: none"> * Stop operation. * Close BOP. * Clear floor and secure area. * Execute well control procedure. * Evaluate drilling parameters to identify root cause. * Continue operations. <p>Completion:</p> <ul style="list-style-type: none"> * Stop operations. * Close BOP. * Clear floor and secure area. * Execute well control procedure. * Continue operations. 	<ul style="list-style-type: none"> * Rig crew * Rig manager * Field superintendent * Project manager
Construction Period	Movement of brine between formations during drilling.	This event could occur if, while drilling the injection target, there is cross flow, with losses into the USDW.	Minor	Unlikely	<ul style="list-style-type: none"> * Tank level sensor. * Mud lab test. * Pressure sensors. * Flow sensors. * Tripping sheets. 	<ul style="list-style-type: none"> * USDW will be covered with the surface casing and set in Pierre Formation. * Casing test after cementing surface casing to check integrity. * FIT test to verify shoe integrity. * Mud used in surface casing are based on fresh water and clays. * CBL to check cement bonding. 	<ul style="list-style-type: none"> * Stop drilling. * Check well level to detect a lost circulation or influx. * In case of losses, treat the well with lost circulation material, and evaluate mud weight and drilling parameters. * In case of influx, control the well, without compromising the shoe integrity. * In case shoe is identified as leaking, squeeze to regain integrity. * In case surface casing shows a leak, squeeze or install a casing patch. 	<ul style="list-style-type: none"> * Rig crew * Rig manager * Field superintendent
Injection Period	Loss of mechanical integrity injection wells – tubing/packer leak	This event could occur because of corrosion, damage in the tubulars during installation, fatigue, higher load profiles, and others and could cause communication of formation fluids with the annular casing tubing as well as sustained casing pressure. There is no LOC in this scenario.	Serious	Likely	<ul style="list-style-type: none"> * Pressure and temperature gauges on surface and downhole real time. * Electromagnetic casing inspection log. * Annular pressure test * CO₂ leak sensors on the wellhead 	<ul style="list-style-type: none"> * Coated tubing. * Inhibited packer fluid in annular. * Corrosion monitoring plan. * Dry CO₂ injected. * Nickel-plated packers. * FF trim tubing hanger and tree. * CR tubing tailpipes below packers. * CR or Inconel carrier for the sensors. * New tubing. 	<ul style="list-style-type: none"> * Trigger alarm by the system, monitoring personnel, or operations engineer. * Follow protocol to stop operation, vent, or deviate CO₂. * Troubleshoot the well. * If tubing leak is detected, discuss with regulator the action plan based on the finding. * Schedule well service to repair tubing. 	<ul style="list-style-type: none"> * Operation engineer * Field superintendent * Project manager
Injection Period Postinjection	Loss of mechanical integrity monitoring wells – tubing/packer leak.	This event could occur because of corrosion, damage in the tubulars during installation, fatigue, higher load profiles, and others and could cause a communication of the formation fluids with the annular casing tubing as well as sustained casing pressure. There is no LOC in this scenario. Monitoring wells are designed to be outside of the projected plume for the majority of the project which reduces the risk of contact with CO ₂ .	Minor	Unlikely	<ul style="list-style-type: none"> * Pressure and temperature gauges on surface and downhole real time. * Electromagnetic casing inspection log. * Annular pressure test. * CO₂ leak sensors on the wellhead. 	<ul style="list-style-type: none"> * Coated tubing. * Inhibited packer fluid in annular. * Corrosion monitoring plan. * Nickel-plated packers * CR tubing below/between packers. * CR or Inconel carrier for the sensors. * New tubing. 	<ul style="list-style-type: none"> * Trigger alarm by the system, monitoring personnel, or operations engineer. * Troubleshoot the well. * If tubing leak is detected, discuss with regulator the action plan for well service. * Schedule well service to repair tubing or abandon the well. 	<ul style="list-style-type: none"> * Operation engineer * Field superintendent * Project manager * Rig crew and DH contractors

Stage	Risk	Description	Severity	Likelihood	Monitoring	Control in Place	Potential Response Actions	Response Personnel
Injection Period	Loss of mechanical integrity injection wells – casing leak.	This event could occur because of corrosion, damage in the tubulars during installation, fatigue, higher load profiles, or others. This event could cause a migration of CO ₂ and brines through the casing, the cement sheet, and into different formations of the injection target or into USDW.	Serious	Unlikely	<ul style="list-style-type: none"> * Pressure and temperature gauges on surface and downhole real time. * Electromagnetic casing inspection log. * CO₂ leak sensors on the wellhead. * DTS fiber real time alongside the casing. * Flow rate monitoring. * Soil gas probes. * Neutron activated logs. * USDW water monitoring. 	<ul style="list-style-type: none"> * CO₂-resistant cement and metallurgic across injection zone. * Injection through tubing and packer. * Nickel-plated packers. * CR or Inconel carrier sensors. * Inhibited packer fluid in the annular. * Cement to surface. * Corrosion monitoring plan. * CBL/USIT after installation. * New casing and tubing installed. 	<ul style="list-style-type: none"> * Trigger alarm by the system, monitoring personnel, or operations engineer. * Follow protocol to stop operation, vent, or deviate CO₂. * Troubleshoot the well. * Evaluate if there is a movement of CO₂ or brines to USDW. In the remote event that USDW gets affected, discuss remediation options with the regulatory agency. * If casing leak is detected, discuss with regulator the action plan based on the finding and location of the leak. * Schedule well service to repair the casing. 	<ul style="list-style-type: none"> * Operation engineer * Field superintendent * Project manager * Rig crew and DH contractors * Remediation contractors
Injection Period Postinjection	Loss of mechanical integrity monitoring wells – casing leak.	This event could occur because of corrosion, damage in the tubulars during installation, fatigue, higher load profiles, and others. This event could cause a migration of CO ₂ and brines through the casing, the cement sheet, and into different formations of the injection target or into USDW. Monitoring wells are designed to be outside of the projected plume for the majority of the project which minimizes the risk of contact with CO ₂ .	Serious	Unlikely	<ul style="list-style-type: none"> * Pressure and temperature gauges on surface and downhole real time. * Electromagnetic casing inspection log. * CO₂ leak sensors on the wellhead. * Soil gas probes. * Neutron activated logs. * USDW water monitoring. 	<ul style="list-style-type: none"> * CO₂-resistant cement across injection zone. * Nickel-plated packers. * CR or Inconel carrier sensors. * Inhibited packer fluid in the annular. * Cement to surface. * Corrosion monitoring plan. * Soil gas probes. * Neutron activated logs. * New casing and tubing installed. 	<ul style="list-style-type: none"> * Trigger alarm by the system, monitoring personnel, or operations engineer. * Troubleshoot the well. * Evaluate if there is a movement of CO₂ or brines to USDW. In the remote event that USDW gets affected, discuss remediation options with the regulatory agency. * If casing leak is detected, discuss with regulator the action plan based on the findings and the location of the leak. * Schedule well service to repair the casing. 	<ul style="list-style-type: none"> * Operation engineer * Field superintendent * Project manager * Rig crew and DH contractors * Remediation contractors
Injection Period	LOC: vertical migration via injection wells.	<p>During the life of the injector wells, there are induced stresses and chemical reactions on the tubulars and cement exposed to the CO₂ pressure and plume.</p> <p>Changes in temperature and injection pressure create stresses in the tubulars trying to expand or contract, and it can lead to microannulus effects.</p> <p>The combination of the dry CO₂ injected and the formation brines creates carbonic acid that reacts with the components of the cement to degrade properties such as permeability, strength, porosity, etc., weakening the matrix.</p> <p>These mechanics could lead to cracks, channels, or simply permeable paths inside the cement that could connect the injection zone with those above the storage complex, causing migration of brines/CO₂.</p>	Serious	Unlikely	<ul style="list-style-type: none"> * CO₂ leak sensors on the wellhead. * DTS fiber real time alongside the casing. * Soil gas probes. * USDW water monitoring. * Neutron activated logs to be run for external MI. * Pressure gauges at surface. * Flow rate monitoring. 	<ul style="list-style-type: none"> * CO₂-resistant cement and metallurgic across injection zone. * Injection through tubing and packer. * Cement to surface. * CBL/USIT after installation. * USDW covered as second barrier with surface casing and surface cement sheet. * New casing installed. 	<ul style="list-style-type: none"> * Trigger alarm by the system, monitoring personnel, or operations engineer. * Follow protocol to stop operation, vent, or deviate CO₂. * Troubleshoot the well. * Evaluate if there is a movement of CO₂ or brines to USDW. In the remote event that USDW gets affected, discuss with regulatory agency remediation options, action plan, and monitoring program. * Discuss with regulator the action plan to repair the well or P&A based on the findings of the assessment. 	<ul style="list-style-type: none"> * Operation engineer * Field superintendent * Project manager * Rig crew and DH contractors * Remediation contractors

Stage	Risk	Description	Severity	Likelihood	Monitoring	Control in Place	Potential Response Actions	Response Personnel
Injection Period Postinjection	LOC: vertical migration via monitoring wells.	<p>During the life of the monitoring wells, there are induced stresses and chemical reactions on the tubulars and cement-exposed brines, pressure plume and, eventually, CO₂.</p> <p>These mechanics could lead to cracks, cement deterioration, channels, or simply permeable paths inside the cement that could connect the injection zone with those above the storage complex, causing migration of brines/CO₂.</p> <p>Monitoring wells are designed to be outside of the plume for the majority of the injection period.</p>	Serious	Unlikely	<ul style="list-style-type: none"> * CO₂ leak sensors on the wellhead. * Soil gas probes. * USDW water monitoring. * Neutron activated logs to be run for external MI. * Pressure gauges at surface. 	<ul style="list-style-type: none"> * CO₂-resistant cement across injection zone. * Cement to surface. * CBL/USIT after installation. * USDW covered as second barrier with surface casing and surface cement sheet. * New casing installed. 	<ul style="list-style-type: none"> * Trigger alarm by the system, monitoring personnel, or operations engineer. * Troubleshoot the well. * Evaluate if there is a movement of CO₂ or brines to USDW. In the remote event that USDW gets affected, discuss with regulatory agency remediation options, action plan, and monitoring program. * Discuss with regulator action plan to repair the well or P&A based on the findings of the assessment. 	<ul style="list-style-type: none"> * Operation engineer * Field superintendent * Project manager * Rig crew and DH contractors * Remediation contractors
Injection Period Postinjection	LOC: vertical migration via water disposal well in Inyan Kara.	This scenario could occur if there is a LOC in the CO ₂ injector well through poor cement or cracks that could allow movement of carbonic acid into the Inyan Kara Formation. Inyan Kara is the main target for water disposal in the area. If carbonic acid gets in contact with the cement and casing for the water disposal well, corrosion and cement degradation could happen, with a potential path to USDW.	Serious	Unlikely	<ul style="list-style-type: none"> * CO₂ leak sensors on the wellhead. * Soil gas probes. * USDW water monitoring. * Neutron activated logs to be run for external MI or tracers. * Pressure gauges at surface. 	<ul style="list-style-type: none"> * Evaluate CO₂-resistant cement through Inyan Kara in the water disposal well. * Validate Class I well will cover USDW to Pierre as well. * Recommended to include water disposal well in corrosion monitoring plan. 	<ul style="list-style-type: none"> * Trigger alarm by the system, monitoring personnel, or operations engineer. * Follow protocol to stop injection. * Troubleshoot the well. * Evaluate if there is a movement of CO₂ or brines to USDW and the source of the leak. * If the injector is the source of the leak, follow protocol for LOC in injectors. * In the remote event that USDW gets affected, discuss with regulatory agency remediation options, action plan, and monitoring program. * Discuss with regulator action plan to repair the well or P&A based on the findings of the assessment. 	<ul style="list-style-type: none"> * Operation engineer * Field superintendent * Project manager * Rig crew and DH contractors * Remediation contractors
Injection Period Postinjection	LOC: vertical migration via legacy wells and P&A wells.	Brines and CO ₂ could migrate through poor cement bonding, cement degradation, or cracking in the cement in P&A wells.	Serious	Unlikely	<ul style="list-style-type: none"> * Soil gas probes. * CO₂ leak sensors. * 4D seismic survey (AOR review periods). 	<ul style="list-style-type: none"> * Legacy wells are properly abandoned for brine movement because of pressurization of injection zone. * Injectors will be abandoned as soon as CO₂ injection in the HUB ends, except if they are left as monitoring wells. 	<ul style="list-style-type: none"> * Trigger alarm by the system, monitoring personnel, or operations engineer. * Evaluate if it's a positive CO₂ release because of a leak in the legacy/P&A well. * Discuss plan with regulator to repair the well, delineate the area, and identify potential resources affected. * Discuss specific remediation actions and monitoring plans. * Execute program, monitor, and evaluate efficacy. 	<ul style="list-style-type: none"> * Operation engineer * Field superintendent * Project manager * Rig crew and DH contractors * Remediation contractors
Injection Period	LOC: vertical migration due to failure of confining rock, faults, or fractures.	This event can occur if, during injection, the pressurization of the injection zone exceeds the sealing capacity of the cap rock/seal above or if there are features such as fault or fractures that are reactivated. CO ₂ and brine could find a leak path to a shallower formation, including USDW.	Serious	Unlikely	<ul style="list-style-type: none"> * USDW water sampling. * 4D seismic survey. * Neutron activated log in injector and monitoring wells. * Gas soil monitoring. 	<ul style="list-style-type: none"> * Seismic survey in the area shows no faults crossing the storage formation or the seal. * Injection is limited to 90% of frac gradient. * Extensive characterization of the rocks show good sealing capacity. * In case cap rock above Broom Creek fails, Inyan Karan underpressure zone will act as a buffer formation before CO₂ or brines reaching USDW. 	<ul style="list-style-type: none"> * Trigger alarm by the system, monitoring personnel, or operations engineer. * Follow protocol to stop injection. * Assess root cause by reviewing monitoring data. * If required, conduct geophysical survey to delineate potential leak path. * Evaluate if there is a movement of CO₂ or brines to USDW. In the event that USDW gets affected, discuss with regulatory agency remediation options, action plan, and monitoring program. * Actions to restore injection will depend on the nature of the leak path and the extent. Operator needs to reevaluate model and discuss action plan with regulator. 	<ul style="list-style-type: none"> * Monitoring staff * Geologist * Reservoir engineer * Project manager * Remediation contractors

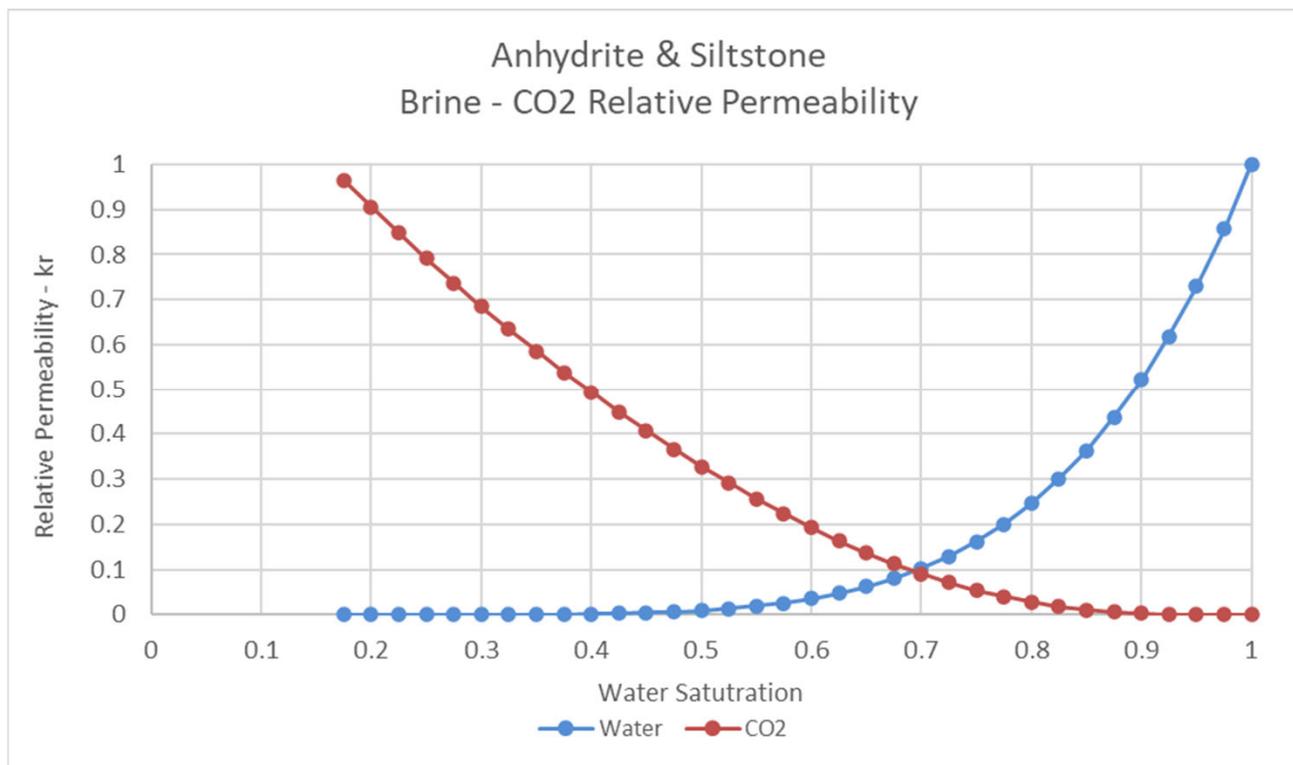
Stage	Risk	Description	Severity	Likelihood	Monitoring	Control in Place	Potential Response Actions	Response Personnel
Injection Period Postinjection	LOC: lateral migration of CO ₂ outside defined AoR.	This event could occur if the CO ₂ plume moves faster or in an unexpected pattern and expands beyond the secured pore space for the project and the AoR.	Serious	Unlikely	<ul style="list-style-type: none"> * 4D seismic. * Neutron activated logs in monitoring wells. * Pressure and temperature gauges real time in monitoring wells. 	<ul style="list-style-type: none"> * Detailed geologic model with stratigraphic wells as calibration. * Seismic survey integrated in the model. * Extensive characterization of the rocks and formation. * AoR review and calibration at least every 5 years. * Monitor the plume until stabilization (min 10 years). 	<p>Injection period:</p> <ul style="list-style-type: none"> * Trigger alarm by monitoring staff. * Review monitoring data and trends, and compare with the simulation. * Discuss with regulatory agency the findings, and request to keep injection process while AoR is reviewed, if the data show that CO₂ will stay in the secured pore space. * Perform logging in monitoring wells. * Conduct geophysical survey as required to evaluate AoR. * Recalibrate model, and simulate new AoR. * Assess if additional corrective actions are needed and if it's required to secure additional pore space. * Assess if any remediation is needed, and discuss action plan with regulatory agency. * Present AoR review to regulatory agency for approval and adjust monitoring plan. <p>Postinjection period:</p> <ul style="list-style-type: none"> * Trigger alarm by monitoring staff. * Review monitoring data and trends, compare with the simulation. * Discuss findings with regulatory agency. * Conduct geophysical survey as required to evaluate AoR. * Recalibrate model, and simulate new AoR. * Assess if additional corrective actions are needed and if it's required to secure additional pore space. * Assess if any remediation is needed, and discuss action plan 	<ul style="list-style-type: none"> * Monitoring staff * Geologist * Reservoir engineers * Project manager
Injection Period	External impact – injector well.	This event could occur if, during injection, the wellhead is hit by a massive object that causes major damages to the equipment. The well gets disconnected from the pipeline and from the shutoff system and leads to a loss of containment of CO ₂ and brine.	Major	Unlikely	<ul style="list-style-type: none"> * Pressure, temperature, and flow sensors in real time. * Field inspections. * OGI cameras. 	<ul style="list-style-type: none"> * Fence location and block direct access to the wellhead. * No populated area. * Doubled lined pads. * Location is able to contain 70.000 bbl, and additional transfer pump and lines are designed to move fluid to the settling ponds southwest of the location. 	<ul style="list-style-type: none"> * Trigger alarm by the system or operations staff. * Follow protocol to shut down CO₂ delivery if the automatic shutoff device is not functional. * If there is injured personnel, call emergency team, and execute evacuation protocol. * Contact the field superintendent to activate emergency plan. * Clear the location, and secure the perimeter. If possible, install containment devices around the location. * Contact well control special team to execute blowout emergency plan that may include but is not limited to capping the well, secure location, drill relief well to kill injector, properly repair or abandon injection well. This plan would be discussed with the regulatory agency. * Evaluate environmental impact (soil, water, fauna, vegetation), and present remediation plan to the Commission for approval. * Execute remediation, and install monitoring system as needed. 	<ul style="list-style-type: none"> * Operation engineer * Field superintendent * Project manager * Rig crew and DH contractors * Remediation contractors * Well control specialist

Stage	Risk	Description	Severity	Likelihood	Monitoring	Control in Place	Potential Response Actions	Response Personnel
Injection Period Postinjection	External impact – monitoring well.	This event could occur if the wellhead of the deep monitoring well is hit by a massive object that causes major damages leading to a LOC. Since the well is open to the formation pressure at the injection zone, formation fluids have the potential to flow and spill on the location.	Major	Unlikely	<ul style="list-style-type: none"> * Pressure, temperature, and flow sensors in real time. * Field inspections. * OGI cameras. 	<ul style="list-style-type: none"> * Fence location, and block direct access to the wellhead. * No populated area. * Lined pads. * Reduced pressure in the monitoring well compared with the injector well on bottom. 	<ul style="list-style-type: none"> * Trigger alarm by the system or operations staff. * If there is injured personnel, call emergency team and execute evacuation protocol. * Contact the field superintendent to activate emergency plan. * Clear the location, and secure the perimeter. If possible, install containment devices around the location. * Contact well control special team to execute blowout emergency plan that may include, but is not limited to, capping the well, securing the location, drilling relief well to kill the injector, properly repairing, or abandoning the injection well. This plan would be discussed with the regulatory agency. * Evaluate environmental impact (soil, water, fauna, vegetation), and present remediation plan to the Commission for approval. * Execute remediation, and install monitoring system as needed. 	<ul style="list-style-type: none"> * Operation engineer * Field superintendent * Project manager * Rig crew and DH contractors * Remediation contractors * Well control specialist
Injection Period	External impact – pipeline.	This event could occur if, during injection, the CO ₂ pipeline is hit, causing major damages and LOC of the CO ₂ .	Major	Unlikely	<ul style="list-style-type: none"> * Pressure, temperature, and flowmeter sensors in real time. * Field inspections. * OGI cameras? 	<ul style="list-style-type: none"> * Buried pipe. * Bollards and/or concrete barriers installed to protect aboveground piping at valve stations. * Painting for visibility in varied weather conditions. * Signage along right of way as needed. * One-call 811 program. 	<ul style="list-style-type: none"> * Trigger alarm by the system or operations staff. * If there is injured personnel, call emergency team, and execute evacuation protocol. * Verify CO₂ flow was shut off by the system, or start protocol to stop flow. * Contact the field superintendent to activate emergency plan. * Clear the location, and secure the perimeter. If possible, install containment devices around the location. * Evaluate environmental impact (soil, water, fauna, vegetation), and present remediation plan to the Commission for approval. * Execute remediation, and install monitoring system as needed. 	<ul style="list-style-type: none"> * Operation engineer * Field superintendent * Remediation contractors * Emergency teams * Plant manager/contact
Injection Period	Monitoring equipment failure or malfunction.	If there is a failure on the monitoring system/ alarm devices, it could lead to overpressurization of the system or reservoir beyond the design limits, causing potential fracturing of the reservoir, leaks or failure on equipment and tubulars, and damage of the facilities.	Serious	Unlikely	<ul style="list-style-type: none"> * Real-time monitoring system and redundancy. * Field inspections. 	<ul style="list-style-type: none"> * Preventive maintenance. * Periodic inspections. 	<ul style="list-style-type: none"> * Trigger alarm by the system or operations staff. * If there is injured personnel or property damage, contact the field superintendent to activate emergency evacuation and secure location. * Assess mechanical integrity of the system, and propose repair actions if needed. * Assess any potential environmental impact, and discuss remedial action with the Commission if needed. * If the assessment allows resuming injection safely, discuss plan with the Commission, and get approval. * Repair or replace instrumentation. Calibrate equipment. * Review monitoring records, and if needed, perform an injectivity test or falloff test to evaluate reservoir. 	<ul style="list-style-type: none"> * Operation engineer * Field superintendent * Project manager * Remediation contractors * Emergency teams * Geologist * Reservoir engineers * Monitoring staff

Stage	Risk	Description	Severity	Likelihood	Monitoring	Control in Place	Potential Response Actions	Response Personnel
Injection Period	Induced seismicity.	This event could occur if pressurization of the reservoir, during injection of CO ₂ , activates preexisting fault planes and creates a displacement that causes a seismic event. If it's a major event, it could compromise the integrity of the wells, facilities, or pipeline.	Major	Unlikely	* Geophones array in surface to monitor induced seismicity. * Geophones/DAS fiber.	* Seismic survey of the storage complex shows no faults that could be reactivated. * A detailed geomechanical model was created to evaluate the storage complex. * The region is seismically stable.	* Trigger alarm by the system or operation staff. * Follow the traffic lighth system described in appendix D, section 2.17.2 * If there is injured personnel or property damages, contact the Field Superintendent to activate emergency evacuation and secure location. * Assess any potential enviromental impact and discussed remedial action with the commission if needed.	* Operation engineer * Field superintendent * Project manager * Remediation contractors * Emergency teams * Geologist * Reservoir engineers * Monitoring staff
Injection Period Postinjection	Major seismic event.	Major natural seismic event.	Major	Unlikely	* Geophones array in surface to monitor induced seismicity. * Geophones/DAS fiber.	* The region is seismically stable.	* Trigger alarm by the system or operation staff. * Follow the traffic lighth system described in appendix D, section 2.17.2 * If there is injured personnel or property damages, contact the Field Superintendent to activate emergency evacuation and secure location. * Assess any potential enviromental impact and discussed remedial action with the commission if needed.	* Operation engineer * Field superintendent * Project manager * Remediation contractors * Emergency teams * Geologist * Reservoir engineers * Monitoring staff

Stage	Risk	Description	Severity	Likelihood	Monitoring	Control in Place	Potential Response Actions	Response Personnel
Injection Period Postinjection	Other major natural disaster.	This scenario could occur in the event of a natural disaster that limits or endangers the normal operation of the Hub.			n/a	n/a	<ul style="list-style-type: none"> * Trigger alarm by the system or operations staff. * If there is injured personnel or property damage, contact the field superintendent to activate emergency evacuation and secure location. * Follow protocol to stop injection. * Assess mechanical integrity of the system, and propose repair actions based on the findings. * Assess any potential environmental impact, and discuss remedial action with the Commission if needed. * If the assessment allows resuming injection safely, increase surveillance to validate effectiveness of the actions. 	<ul style="list-style-type: none"> * Operation engineer * Field superintendent * Project manager * Remediation contractors * Emergency teams * Geologist * Reservoir engineers * Monitoring staff

BC page A-16, figure A-13



2.4.4.5 Ductility and Rock Strength

Ductility and rock strength have been determined through laboratory testing of rock samples acquired from the Opeche/Spearfish Formation core in the J-LOC1 well. To determine these parameters, a multistage triaxial test was performed at confining pressures exceeding 40 MPa (5,800 psi). This commonly used test provides information regarding the elastic parameters and peak strength of a material. Because of the low porosity and anhydrite mineralogy, samples were not saturated for testing. Table 2-24 shows the sample parameters, and Table 2-25 shows the elastic parameters obtained.

Rock strength was determined at the final stage of confinement and axial loading. As shown in Figure 2-65, the sample failed at a maximum stress of 113.8 MPa (16,505.295 psi). Based on the plot below, the final stage (Radial Stage 4) of testing, shown in yellow, has significant residual strength postfailure, indicating a high degree of ductility.

Table 2-24. Sample Parameters

Sample and Experiment Information			
Depth:	4,905.8 ft	Rock Type:	Anhydrite
Formation:	Opeche/Spearfish	Porosity:	3.5%
Dry Bulk Density:	2.660 g/cm ³	Pore Fluids:	None
Diameter:	25.40 mm	Entered Length:	62.99 mm

Table 2-25. Elastic Properties Obtained Through Experimentation: E = Young's Modulus, n = Poisson's Ratio, K = Bulk Modulus, G = Shear Modulus, P = Uniaxial Strain Modulus

Elastic Properties Measured at Different Confining Pressures							
Event	Conf., MPa	Diff., MPa	E, GPa	n	K, GPa	G, GPa	P, GPa
1	10.2	10.0	55.14	0.140	25.51	24.19	57.76
2	20.3	20.2	58.07	0.150	27.65	25.25	61.32
3	30.2	30.1	60.84	0.161	29.93	26.20	64.86
4	40.3	40.0	60.94	0.195	33.35	25.49	67.34

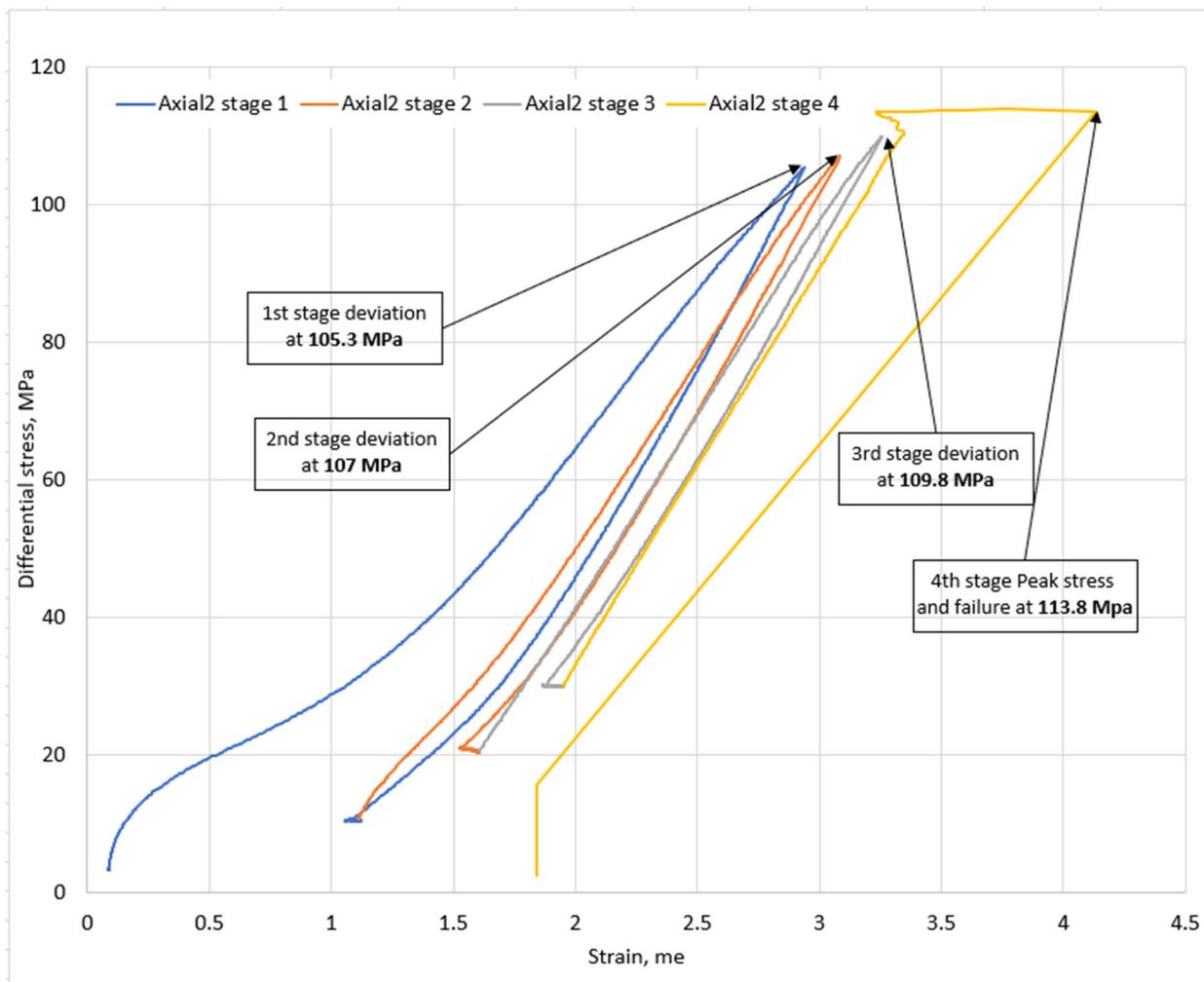


Figure 2-65. Results of multistage triaxial test performed at confining pressures exceeding 40 MPa (5,800 psi), providing information regarding the elastic parameters and peak strength of the rock sample. Failure occurred at the fourth-stage peak stress of 113.8 MPa.

2.5 Faults, Fractures, and Seismic Activity

2.5.1 Faults and Fractures

In the Tundra SGS area, no known or suspected regional faults or fractures with sufficient permeability and vertical extent to allow fluid movement between formations have been identified through site-specific characterization activities, previous studies, or oil and gas exploration activities. The following section discusses the seismic history of North Dakota and low probability that seismic activity will interfere with containment.

2.5.2 Seismic Activity

The Williston Basin is a tectonically stable region of the North American Craton. Zhou and others (2008) summarize that “the Williston Basin as a whole is in an overburden compressive stress regime,” which could be attributed to the general stability of the North American Craton. Interpreted structural features associated with tectonic activity in the Williston Basin in North Dakota include anticlinal and synclinal structures in the western half of the state, lineaments associated with Precambrian basement block boundaries, and faults (North Dakota Industrial Commission, 2019).

Between 1870 and 2015, 13 seismic events have been detected within the North Dakota portion of the Williston Basin (Table 2-26) (Anderson, 2016). Of these 13 seismic events, only three have occurred along one of the eight interpreted Precambrian basement faults in the North Dakota portion of the Williston Basin (Figure 2-66). The seismic event recorded closest to the Tundra SGS storage facility area occurred 39.6 mi from the J-ROC1 well near Huff, North Dakota (Table 2-26). The magnitude of this seismic event is estimated to have been 4.4.

Table 2-26. Summary of Seismic Events Reported to Have Occurred in North Dakota (from Anderson, 2016)

Date	Magnitude	Depth, mi	Longitude	Latitude	City or Vicinity of Seismic Event	Map Label	Distance to Tundra SGS J-ROC1 Well, mi
Sept. 28, 2012	3.3	0.4*	-103.48	48.01	Southeast of Williston	A	124.6
June 14, 2010	1.4	3.1	-103.96	46.03	Boxelder Creek	B	149.1
March 21, 2010	2.5	3.1	-103.98	47.98	Buford	C	144.1
Aug. 30, 2009	1.9	3.1	-102.38	47.63	Ft. Berthold southwest	D	67.4
Jan. 3, 2009	1.5	8.3	-103.95	48.36	Grenora	E	156.0
Nov. 15, 2008	2.6	11.2	-100.04	47.46	Goodrich	F	61.6
Nov. 11, 1998	3.5	3.1	-104.03	48.55	Grenora	G	166.5
March 9, 1982	3.3	11.2	-104.03	48.51	Grenora	H	164.9
July 8, 1968	4.4	20.5	-100.74	46.59	Huff	I	39.6
May 13, 1947	3.7**	U	-100.90	46.00	Selfridge	J	74.9
Oct. 26, 1946	3.7**	U	-103.70	48.20	Williston	K	140.2
April 29, 1927	0.2**	U	-102.10	46.90	Hebron	L	43.4
Aug. 8, 1915	3.7**	U	-103.60	48.20	Williston	M	136.4

* Estimated depth.

** Magnitude estimated from reported modified Mercalli intensity (MMI) value.

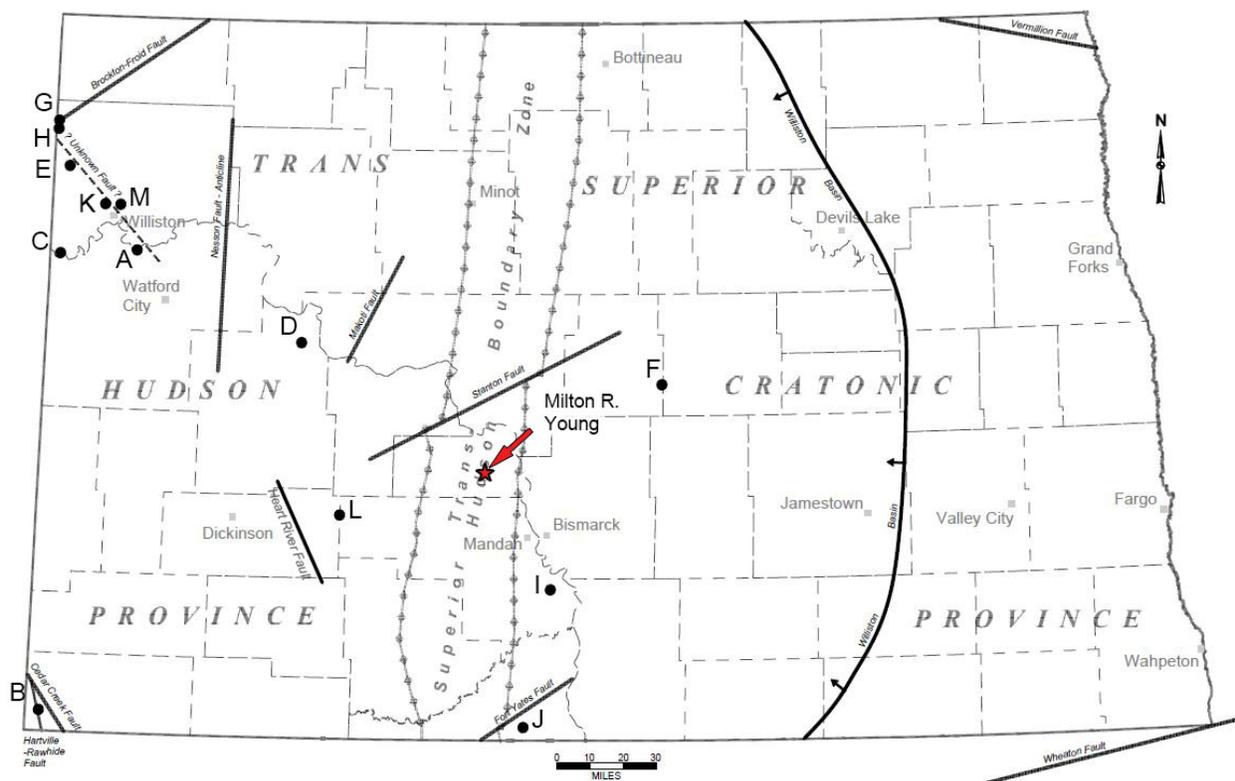


Figure 2-66. Location of major faults, tectonic boundaries, and seismic events in North Dakota (modified from Anderson, 2016). The black dots indicate seismic event locations listed in Table 2-26.

Studies completed by the U.S. Geological Survey (USGS) indicate there is a low probability of damaging seismic events occurring in North Dakota, with less than two damaging seismic events predicted to occur over a 10,000-year time period (Figure 2-67) (U.S. Geological Survey, 2019). A 1-year seismic forecast (including both induced and natural seismic events) released by USGS in 2016 determined North Dakota has very low risk (less than 1% chance) of experiencing any seismic events resulting in damage (U.S. Geological Survey, 2016). Frohlich and others (2015) state there is very little seismic activity near injection wells in the Williston Basin. They noted only two historic seismic events in North Dakota that could be associated with nearby oil and gas activities. These results indicate relatively stable geologic conditions in the region surrounding the potential injection site. Based upon the review and assessment of 1) the USGS studies, 2) the characteristics of the Broom Creek injection zone and upper and lower confining zones, 3) the low risk of induced seismicity due to the basin stress regime, and 4) history of recorded seismic events, seismic activity will not interfere with containment of the maximum volume of CO₂ proposed to be injected annually over the life of this project.

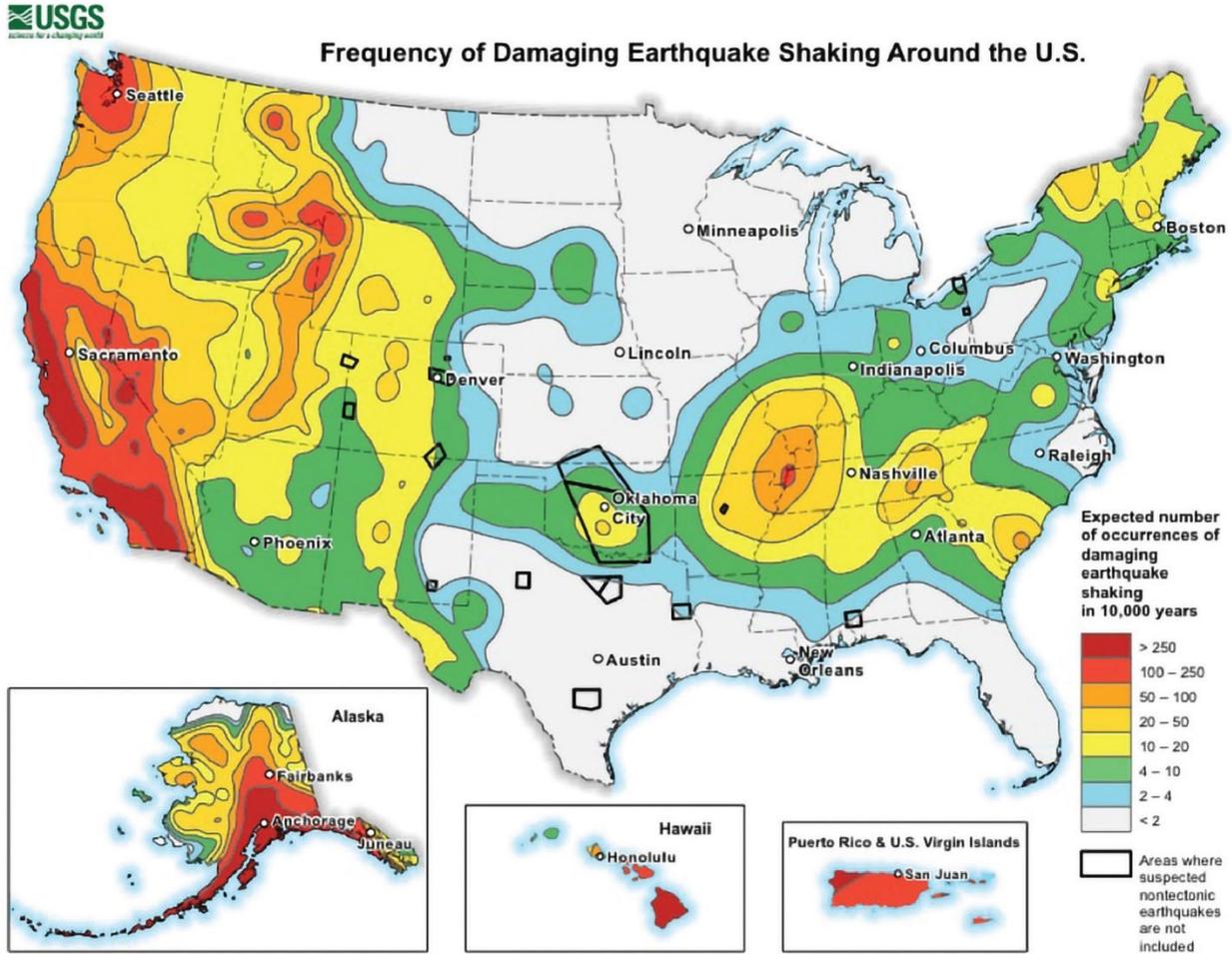


Figure 2-67. Probabilistic map showing how often scientists expect damaging seismic event shaking around the United States (U.S. Geological Survey, 2019). The map shows there is a low probability of damaging seismic events occurring in North Dakota.

2.6 Potential Mineral Zones

The North Dakota Geological Survey recognizes the Spearfish Formation as the only potential oil-bearing formation above the Broom Creek Formation. However, production from the Spearfish Formation is limited to the northern tier of counties in western North Dakota (Figure 2-68). There has been no exploration for, nor development of, hydrocarbon resource from the Spearfish Formation in the Tundra SGS area.

There has been no historic hydrocarbon exploration in, or production from, formations below the Broom Creek Formation in the storage facility area. The only hydrocarbon exploration well near the storage facility area, the Herbert Dresser 1-34 (NDIC File No. 4937) was drilled in 1970 to explore potential hydrocarbons in the Charles Formation. The well was dry and did not suggest the presence of hydrocarbons. There are no known producible accumulations of hydrocarbons in the storage facility area.



SPEARFISH DRILL STEM TEST RESULTS

Prepared by
Travis Stolldorf

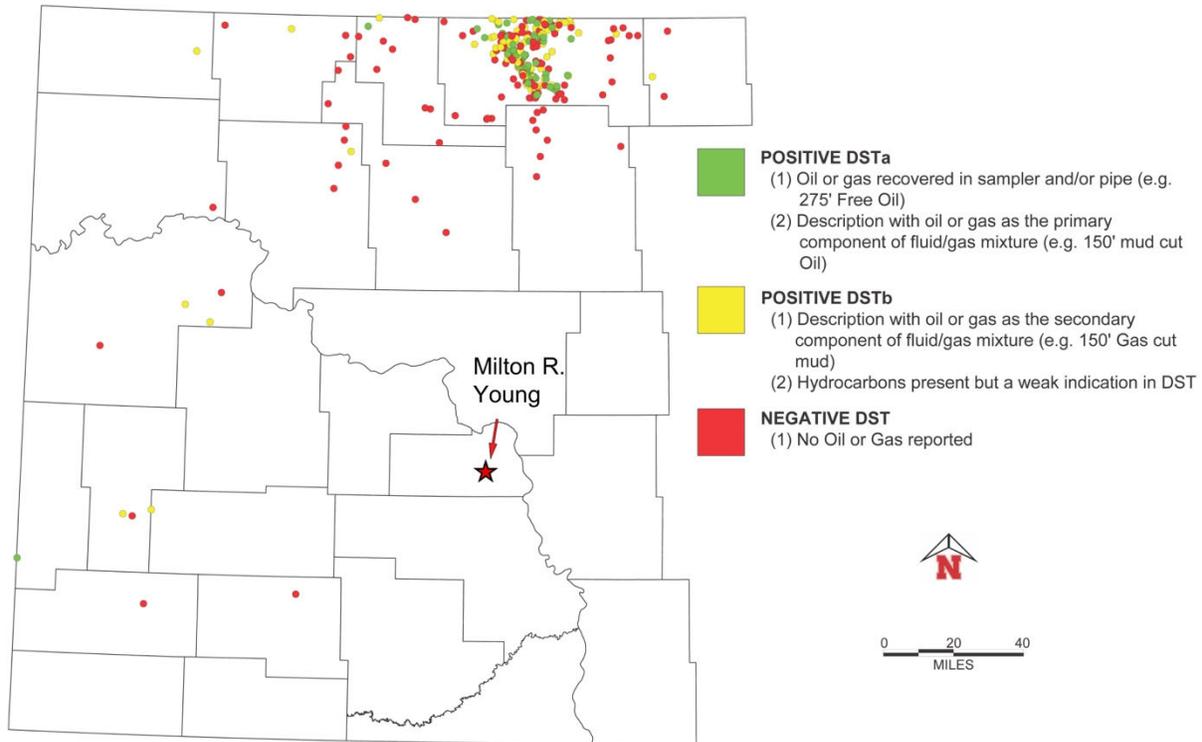


Figure 2-68. Drillstem test results indicating the presence of oil in the Spearfish Formation samples (modified from Stolldorf, 2020).

Shallow gas resources can be found in many areas of North Dakota. North Dakota regulations (NDCC 57-51-01) define shallow gas resources as “gas produced from a zone that consists of strata or formation, including lignite or coal strata or seam, located above the depth of five thousand feet (1,524 meters) below the surface, or located more than five thousand feet (1,524 meters) below the surface but above the top of the Rierdon Formation (Jurassic), from which gas may be produced.”

Lignite coal currently is mined in the area of the Center Coal Mine, operated by BNI Coal. The Center Mine currently mines the Hagel coal seam for use as fuel at Minnkota Power Cooperative’s MRYS. The Hagel coal seam is the lowermost major lignite present in this area of the Sentinel Butte Formation.

Thickness of the Hagel coal seam averages 7.8 ft in the area permitted to be mined but varies, with some areas exceeding 10 ft in thickness (Figure 2-69) (Zygarlicke and others, 2019). Coal seams in the Bullion Creek Formation exist in the area below the Hagel seam, but currently the Hagel is the only economically minable seam with its thickness and overburden of 100 ft or less (Figures 2-69 and 2-70). The Hagel and other coal seams in the Fort Union Group thicken and deepen to the west. The overlying Beulah-Zap coal seam has pinched out farther to the west but is economically minable in the central part of Mercer County at North American Coal’s Coteau Mine. The Hagel seam pinches out to the east, and no other coal seams are mined farther east than the Hagel.

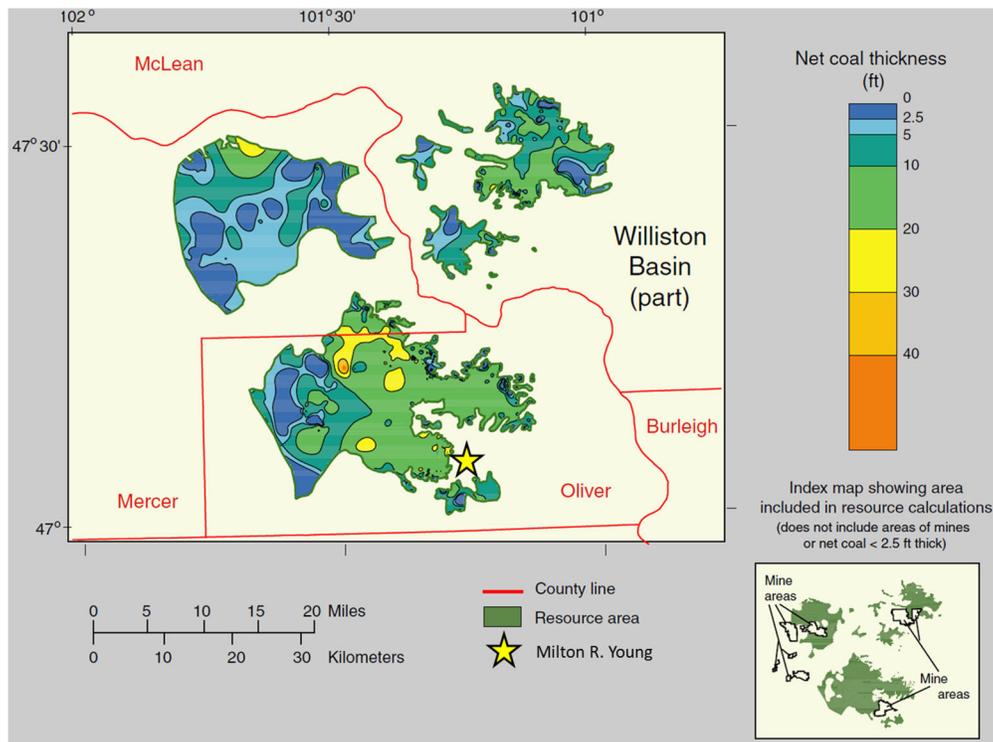


Figure 2-69. Hagel net coal isopach map (modified from Ellis and others, 1999).

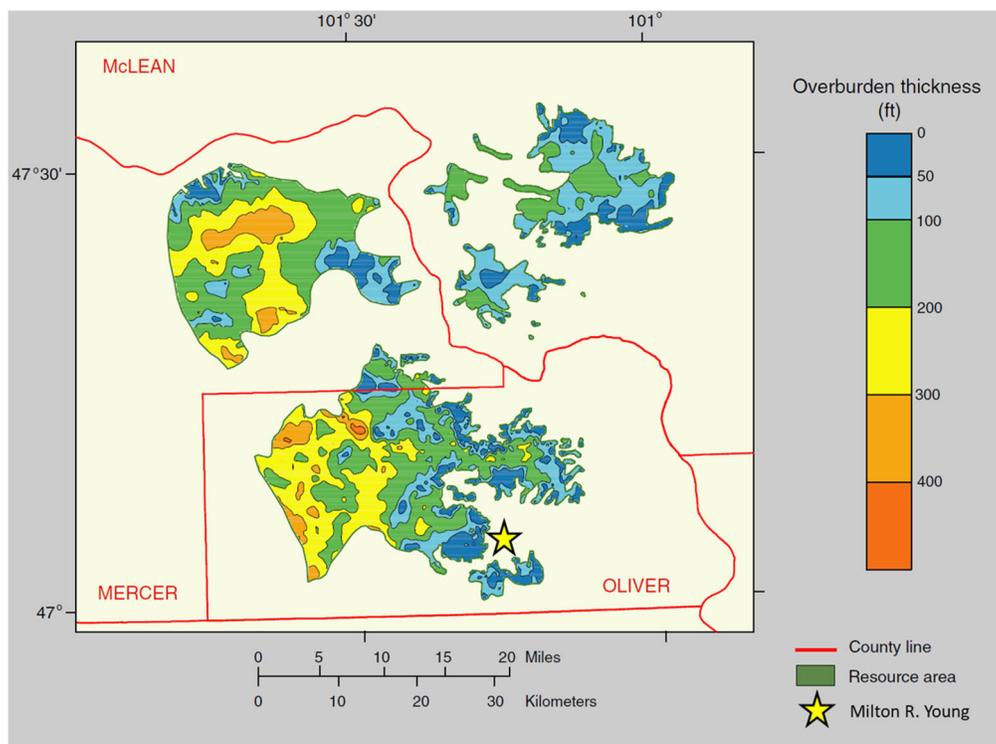
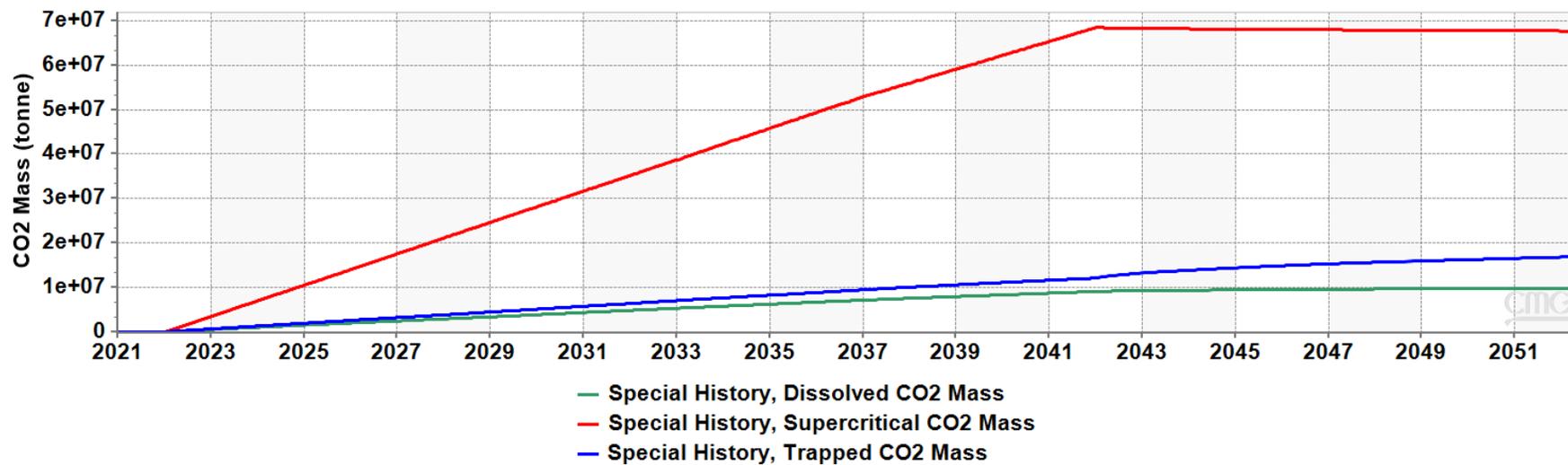


Figure 2-70. Hagel overburden isopach map (modified from Ellis and others, 1999).

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Cumulative CO2 Mass



5.2 Proposed Completion Procedure for Broom Creek CO₂ Injectate Well

1. Nipple up BOP (blowout preventer).
2. Test BOP.
3. Pick up work string and bit to clean out cement.
4. Run in the hole and tag the stage tool.
5. Circulate with brine, 10 ppg.
6. Drill out the stage tool and clean the casing until the top of the float collar.
7. Circulate with brine, 10 ppg.
8. Test casing for 30 minutes with 1,500 psi. If the pressure decreases more than 10% in 30 minutes, bleed pressure, check surface lines and surface connections, and repeat test. If the failure persists, the Operator may require assessing the root cause and correcting it.
9. Pull BHA (bottomhole assembly) out of the hole.
10. Perform safety meeting to discuss logging and perforating operations.
11. Rig up logging truck.
12. Run cased-hole logs by program. Note: run CBL/VDL (cement bond log/variable density log) and USIT (ultrasonic imaging tool) logs without pressure as a first pass and run them with 1000 psi pressure as a second pass.
Note: In case cementing logs show poor bonding in the cementing job, the results will be communicated to the North Dakota Industrial Commission (NDIC), and an action plan will be prepared.
13. Run oriented perforating guns to the injection target. An oriented gun should be used to avoid any damage to the external fiber optic.
14. Perforate the Broom Creek Formation, minimum 4 spf (shots per foot). The depth will be defined with the final log. Gas gun technology or high-performance guns should be evaluated to provide deeper penetration into the formation.
15. Pull guns out of the hole.
16. Rig down logging truck.
17. Pick up straddle packer and run in the hole with work string.
18. Circulate with brine, 10 ppg.
19. Set packer to isolate the perforations.
20. Rig up acid trucks and equipment.
21. Perform cleaning of the perforations with acid. Adjust acid formulation and volumes with water samples and compatibility test.
22. Rig down acid trucks and equipment.
23. Perform an injectivity test/step rate test.
24. Unset packer and circulate hole.
25. Pull packer and work string out of the hole.
26. Rig up spooler and prepare rig floor to run upper completion.
27. Run completion assembly per program.
28. Circulate well with inhibited packer fluid.
29. Set packer 100 ft above the top perforations.
30. Install tubing sections, cable connector, and tubing hanger.
31. Rig up logging truck.



Liberty-1

KB: 2022 ft / GL:1997 ft

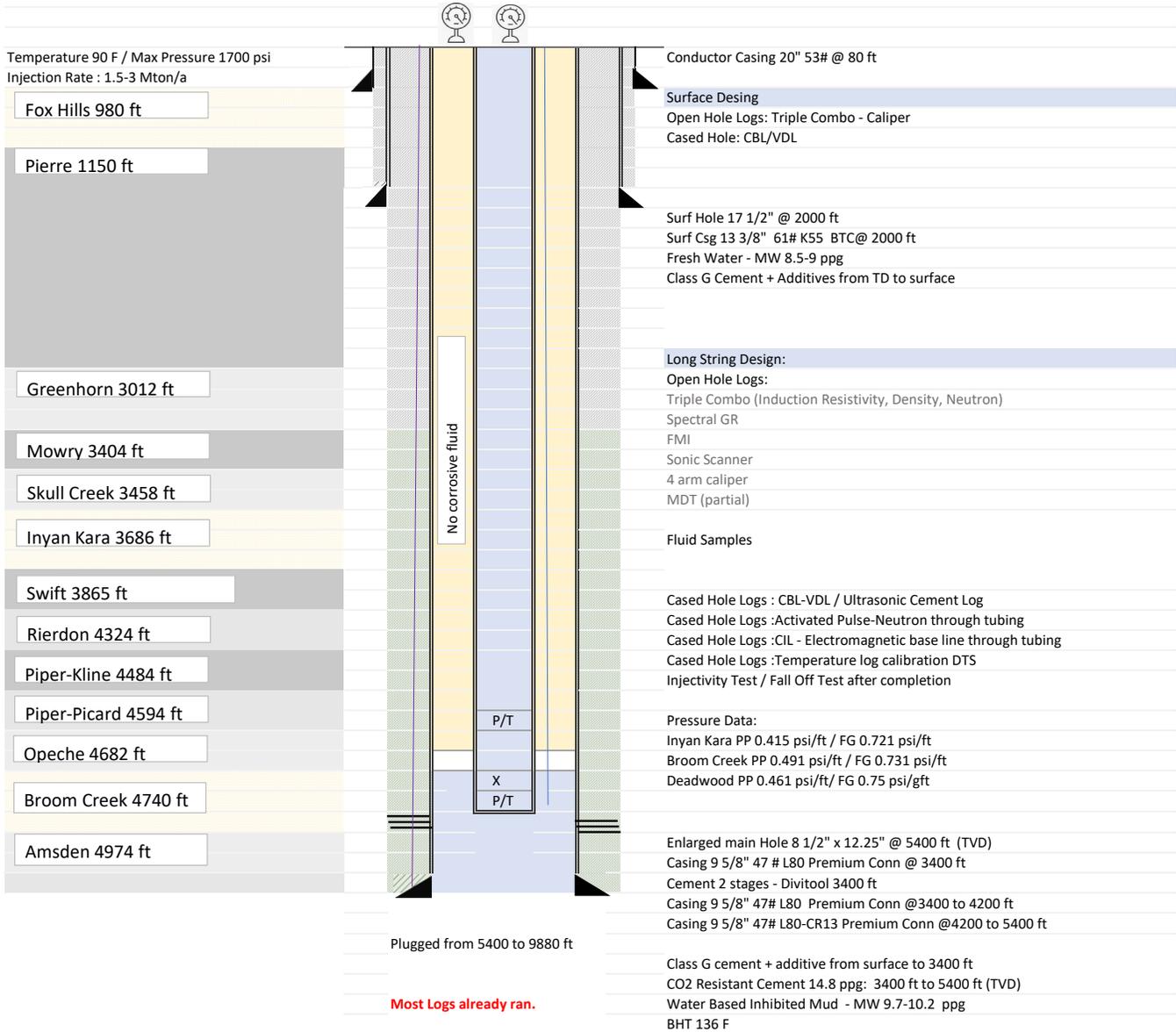


Figure 5-2. Liberty-1 (JROC-1 File No. 37672) Broom Creek injection proposed well completion wellbore schematic.

Unity-1 Injector BC Twin

KB: 2022 ft / GL:1997 ft

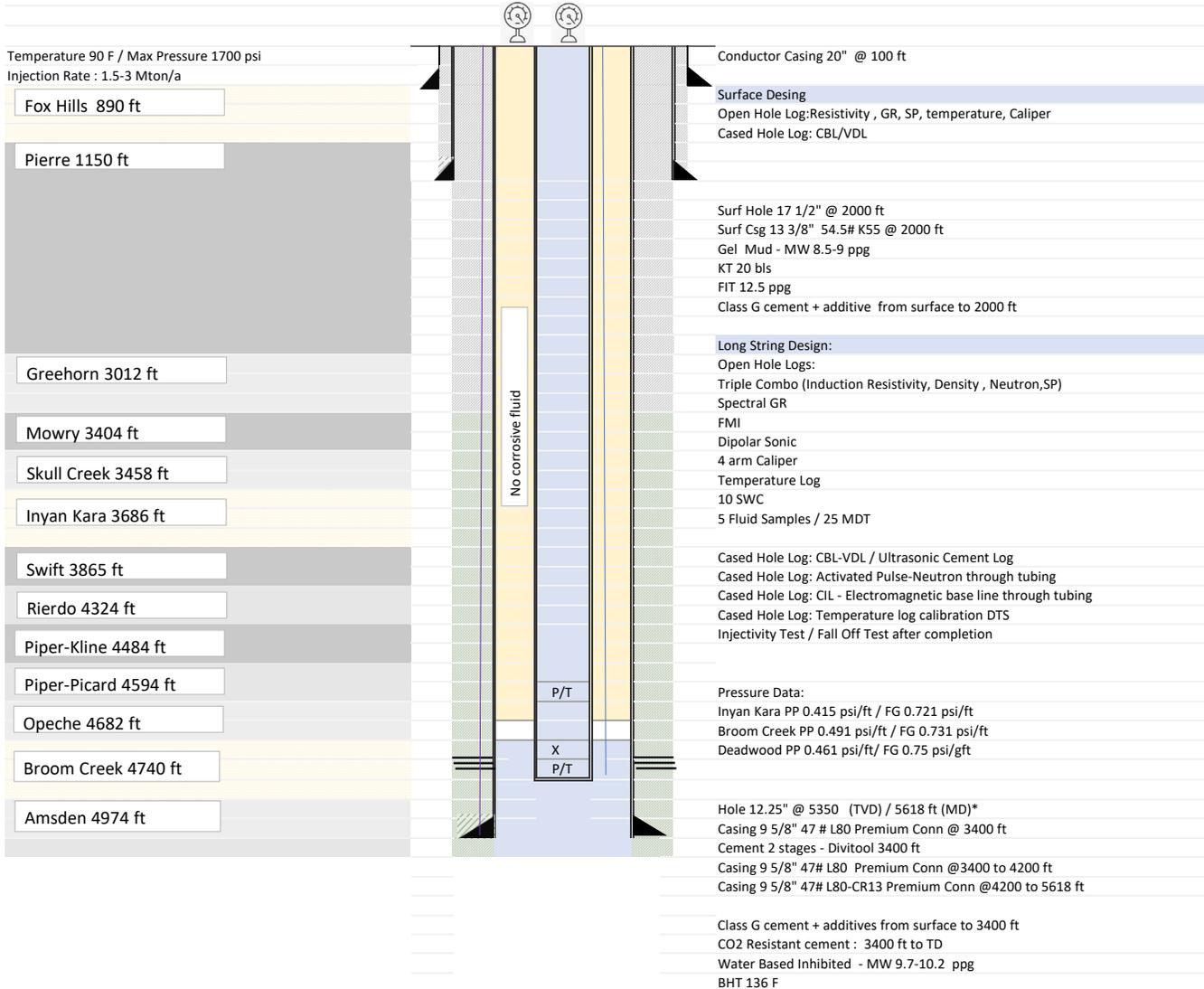


Figure 5-3. Unity-1 Broom Creek injection well proposed completion wellbore schematic.

Doc#	Deadwood Supplement	Location in Application
DW1	Flowline construction plan	p. 2-3 Figure 2-2
DW2	Provide the index of additional well tops used to modify; add wells to map	p. 2-14 Figure 2-8
DW3	Provide better version of figure, hard to see the detail in the stratigraphic information	p. 2-15 Figure 2-9
DW4	Higher resolution of figures; clarify in caption of Figure 2-12b that structure is relative to sea level	p. 2-19 and 2-20 Figures 2-12a and 2-12b
DW5	Provide rates and bottom hole pressures for geochem simulations	p. 2-34
DW6	Supplement requested	p. 2-55
DW7	Include the structure on other figures	p. 2-81 Figure 2-59
DW8	Supplement the Mohr circle with the values and depict on how it was shifted for pore pressure, if it was? (6:18 on hearing audio)	p. 2-83 Figure 2-61
DW9	Initial 5 year pressure map, and incremental 5, 10 and 15 year during injection, already have 20 year included and 10 year post included	p. 2-84 Figure 2-62 p. 3-2 Figure 3-1
DW10	Add springs to well map	p. 3-21 Figure 3-3
DW11	Higher resolution image	p. 3-6 Figure 3-5
DW12	Correct error in table for the existing above ground facilities and describe what these are. Springs too	p. 3-7 Table 3-1
DW13	Request to separate the Black Island and Deadwood	p. 3-9 Tables 3-3 through 3-5
DW14	Request to clarify that we will run temperature logging annually on the 7800 to TD	p. 4-17 Table 4-7
DW15	Provide maps of pressure over time to match the saturation maps	p. 4-21 Figures 4-6 and 4-7
DW16	Fixes to well diagrams	p. 4-23 Figure 4-8 p. 4-54 Figure 4-12 p. 5-2 Figure 5-1
DW17	Add the top of Black Island in the diagram if the well in the AOR. JLOC-1, JROC-1, Little Boot.	Figures 3-6, 3-7**, 3-8
DW18	Consolidate the well type in less type of well (stock, domestic/stock example).	p. 3-21 Figure 3-13
DW19	Correct traffic light in ERRP in the section of induced seismicity and natural earthquake.	Appendix E
DW20	Correction to Section 1.11	Appendix H
DW21	Fracture propagation gradient	p. A-18

Doc#	Deadwood Supplement	Location in Application
DW22	Typo of DW Delta P	p. 4-68
DW23	DW Fig A-15	p. A-19 Figure A-15
DW24	Corrections to wellbore schematic	Deadwood
DW25	Correction to Figure 2-11	Figure 2-11

** indicates that a higher resolution version is unavailable.

Supplement on Flow Line

Minnkota Power Cooperative (MPC) plans to construct a Carbon Capture and Sequestration (CCS) system at their Milton R. Young Power Plant in Oliver County, North Dakota. This system will include one 16-inch OD pipeline that will ultimately supply CO₂ for subsequent injection and sequestration at one proposed well pad location. The flowline will be routed to the Southeast corner of the power plant property, approximately 0.25 miles, to the proposed location of Well Pad #1. An overview of the pipeline system is shown in Figure 1-1. The information contained in this supplement is from a FEED study performed by Burns & McDonnell establishing a design basis manual for use in the final detailed design phase and development of a CCS construction plan. At this time, materials and contractor have not been selected. However, when final construction plan is issued, Minnkota will submit notice of intent a minimum of seven (7) days prior to commencing construction in a form containing all required and requested information in accordance with NDAC § 43-02-03-29.1.

Figure. Proposed Tundra CO₂ Flow Line Overview



Pipeline Design Criteria

The pipeline system will include an inlet meter station near the exit of the CCS facility and a meter station at the well pad site. The CCS facility outlet piping will be designed and routed by others to the boundary of the proposed inlet meter station. An available tie-in point is proposed to be installed at the inlet meter station to supply potential future customers with CO₂ for enhanced oil recovery (EOR). No intermediate pump stations or mainline valves are expected to be required for the project. To monitor for mechanical integrity, direct inspection of the pipeline will be employed.

The pipeline system will have a nominal transportation capacity of 12,980 tons per day of CO₂ transported in dense phase. It is expected that the pipelines shall be operated via a remote control room

whose location will be identified in the future once an operator is determined. If the pipeline and associated facilities are to be operated locally by the CCS operator, MPC advised that additional space will be provisioned in the CCS facility control room to accommodate pipeline operations, if needed. The meter station shall be able to be controlled via a SCADA system from the aforementioned control room. The meter station shall have an RTU building with the capability of communicating with the control room. A mass flow comparison between metering sites will be the primary method of leak detection, however the project proposed to installed a fiber optic alongside the pipe with capability for distributed temperature sensing DTS, Distributed Acoustic and Strain Sensing (DAS/DSS)to proactively monitor the system. In the event that the CSS Facility and Injection Well Facilities are owned and/or operated by a different party than the pipeline, the RTU buildings will be able to house two RTUs and be capable of sharing metering data with the other parties, if applicable.

The design CO₂ stream composition is as follows:

COMPONENT NAME	COMPONENT ID	COMPOSITION	(Mole Fraction - %)
CARBON DIOXIDE	CO ₂	99.90%	99.9
WATER	H ₂ O	632 PPMV	0.0632
NITROGEN	N ₂	163 PPMV	0.0163
ARGON	Ar	4 PPMV	0.0004
OXYGEN	O ₂	6 PPMV	0.0006
SULFUR DIOXIDE	SO ₂	1 PPMV	0.0001
NITROGEN DIOXIDE	NO ₂	1 PPMV	0.0001
NITRIC OXIDE	NO	30 PPMV	0.003

The pipeline inlet conditions (from CCS facility) have been defined as 1,800 psig and 120°F. Using the Peng-Robinson equation of state and assuming isentropic expansion, the decompression pressure was determined to be 1059.68 psig. This value was used in the development of the ductile fracture mitigation.

Aspen HYSYS software was used to perform the hydraulic simulation and generate the phase diagrams.

The pipeline will be designed to comply with Title 49 CFR Part 195 and ASME B31.4 requirements. The pipeline design pressure will be the maximum operating pressure (MOP) of the system, in accordance with 49 CFR Part 195. The maximum operating pressure (MOP) is the maximum pressure at which the system may be operated. For this project, the Design Pressure and MOP are as follows:

- Design Pressure = 1,800 psig
- MOP = 1,690 psig

The ambient design temperatures for all above-grade pipe sections are as follows:

- Maximum Temperature: 120°F
- Minimum Temperature: -50°F

The ambient design temperatures for all below-grade pipe sections are as follows:

- Maximum Temperature: 120°F
- Minimum Temperature: -20°F

The maximum operating temperature shall be 120°F

- Temperature derating factor for pipe, $T = 1.0$

Fluid composition is non-corrosive to the material selected. There is no explicit corrosion allowance provided in the WT design.

Pipe Specification

All pipe shall be manufactured in accordance with API Specification 5L, with adherence to Annex G “PSL 2 Pipe with Resistance to Ductile Fracture Propagation”. The following shall be specified to the manufacturer and recorded for all pipe:

- Outside Diameter (OD)
- Wall Thickness (WT)
- Pipe Grade
- Longitudinal Seam Type
- Specified Minimum Yield Strength (SMYS)
- Joint Design – Bevel
- External Coating
- Minimum Joint Length
- Total Footage or Miles
- Charpy V-Notch Testing Requirements

The proposed pipeline specifications for open-cut, bore, road and station scenarios are as follows:

- Open cut:
 - Design pressure – 1,800 psig
 - Wall thickness - 0.500 inch
 - Nominal size - 16 inch
 - Grade API 5L X-65 PSL 2
 - 44.31% SMYS @ 1,800 psig
 - Seam type – HFW (ERW)

- 40' Double Random Length (DRL) joints
 - Length of pipe joints to be finalized prior to future development of Bill of Material
- Bore / Road / Station Pipe:
 - Design pressure – 1,800 psig
 - Wall thickness - 0.500 inch
 - Nominal size - 16 inch
 - Grade API 5L X-65 PSL 2
 - 44.31% SMYS @ 1,800 psig
 - Seam type – HFW (ERW)
 - 40' Double Random Length (DRL) joints
 - Length of pipe joints to be finalized prior to future development of Bill of Material
- Steel pipe shall be manufactured in accordance with API 5L PSL 2. Steel pipe to be buried shall have 14-16 mils of Fusion Bonded Epoxy (FBE) protective coating.
- Bores and HDD crossings shall be protected by an Abrasive Resistant Overcoat (ARO)

Mainline valves will be installed for the pipeline at the inlet meter station facility and at the well pad meter station.

Transition pieces at the bore locations will not be required for the pipeline, as all pipe and fittings will have a matching wall thickness of 0.500". Changes in wall thickness, if required, will be accomplished by beveling in accordance with ASME B31.4.

To prevent corrosion of the pipeline exterior, all buried pipe and fittings are to be coated with 14-16 mils of fusion bonded epoxy (FBE) coating. Bore pipe to be coated with 14-16 mils of FBE coating and an additional minimum 40 mils of Abrasion Resistant Overcoat (ARO). All girth welds shall be coated with a field applied coating with a minimum thickness equal or greater than the factory coating of the adjacent pipe. Above ground valve assemblies, valves, and piping shall be primed and painted in accordance with the installation specifications to meet operating and ambient temperature conditions to prevent atmospheric corrosion. Gaps between mating flanges shall be protected to prevent entry of foreign materials and moisture.

Ductile Fracture Mitigation

Fracture propagation control is achieved by ensuring that the toughness of the line pipe steel is sufficiently high to arrest propagating fractures. In order to comply with Title 49, Code of Federal Regulations, Part 195, §195.111, mitigation of propagating fractures is being achieved by controlling the minimum toughness of the produced pipe steel. The Battelle Two-Curve Method (TCM) was utilized to determine the minimum toughness for the pipe specification.

The minimum toughness (Charpy V-Notch Impact Energy) requirements for the pipe steel selected is as follows:

Outside Diameter (in)	Wall Thickness (in)	Grade (API 5L)	Minimum Toughness (ft-lb)
16.00	0.500	X65	32

Pipeline Depth, Trench/Fill and Markers

Pipeline minimum depth of cover is 4 ft., typical, to mitigate the likelihood of 3rd party damage, especially in agricultural fields.

Trench bottom shall be smooth and free from rocks, debris and protrusions. Pipe must be installed such that the pipe fits the curvature of the ditch to minimize stresses and protect the pipe coating from damage. Top 12" of topsoil shall be segregated for all excavated areas. All topsoil piles shall be stabilized with mulch or tackifier throughout construction to prevent wind and water erosion. Topsoil is not to be mixed with subsoils during any construction activity. After backfill is in place and suitable subsoil contours are reestablished, subsoil shall be properly de-compacted prior to redistributing topsoil. The final grade must not alter current drainage or allow ponding of water.

Pipe must be backfilled in a manner that provides firm support under the pipe. Pipe must be backfilled to 90% relative compaction with sand or rock-free native soil to a minimum 1 ft. above top of pipe in a manner that prevents damage to the pipe and coating from equipment or from the backfill material. Remainder of trench shall be backfilled with native soil to 90% relative compaction.

Pipeline markers shall be installed at minimum in accordance with the following requirements:

- Markers must be located at each public road crossing, at each railroad crossing, at each waterway crossing, at major pipeline changes in direction and in sufficient number along the remainder of each buried line so that its location is accurately known.
- The marker must state at least the following on a background of sharply contrasting color:

- The word “Warning,” “Caution,” or “Danger” followed by the words “Carbon Dioxide Pipeline,” all of which, except for markers in heavily developed urban areas, must be in letters at least 1 inch (25 millimeters) high with an approximate stroke of 1/4 inch (6.4 millimeters).
- The name of the operator and a telephone number (including area code) where the operator can be reached at all times.

Cathodic Protection and AC Mitigation

The pipeline will use an impressed current cathodic protection system. AC rectifiers and ground beds will be required for cathodic protection of all pipelines. Sacrificial anodes will be used to protect the buried station piping where isolated from the impressed current system. The cathodic protection will be designed to meet the requirements of 49 CFR, Part 195 and the recommended practices of NACE SP0169 and supplemented by ISO 15589-1. Isolation flange kits will be installed to isolate areas requiring electrical isolation, e.g. station piping.

It is recommended that during the detailed design phase, a soil resistivity survey be performed along the pipeline route to support the design of the cathodic protection system and the AC mitigation system, if applicable. From the desktop route review, AC Mitigation is not expected to be required, however, it is recommended that an AC risk analysis be performed during the detailed design phase of the project, followed by computer-based modeling and mitigation system design, if deemed necessary. If high risk areas are identified, appropriate AC mitigation measures will be incorporated in the design of the system in accordance with NACE RP 0177-2000.

During commissioning of the CP system, it is required that an ACVG or DCVG survey be performed on the line after backfill to verify the absence of coating holidays and that a close-interval survey be performed to confirm the performance of the CP system. All wiring at the rectifier and test stations shall be confirmed to have been properly installed and readings shall be collected at these locations to confirm system performance.

Strength Testing and Drying

In accordance with 49 CFR, Part 195, the pipelines shall be hydrostatically tested to a minimum of 1.25 times the design pressure of 1,800 psig (2,250 psig) for a minimum 8 hours. Test pressures shall not exceed 4,062 psig (100% of SMYS for 16”, 0.500, X-65 pipe)

- If CL 900 fittings are present, test pressures shall not exceed 3,330 psig (1.5 x 2,220 psig for CL 900).
- Water withdrawal/sourcing shall be permitted prior to construction. It is assumed surface water will be used for testing.
- All fill water if taken from surface sources shall be tested prior to withdrawal.

- All fill water shall be free of contaminants that may be removed by filtering.

Water shall be discharged into a dewatering structure in an upland area and shall be permitted prior to construction.

Hydrostatic calculations to be performed in detailed design and will include test section breaks (not anticipated), minimum and maximum test pressures, water volumes, intake and discharge locations (if required). After successful hydrotest, the pipeline shall be dewatered and dried to a minimum dew point of -40°F.

2.3 Storage Reservoir (injection zone)

Regionally, the Black Island and Deadwood Formations are laterally extensive (Figure 2-8). The Black Island comprises high-energy shallow marine sandstone (permeable storage intervals) and shale (impermeable layers). The sandy members (C-sand and E member) of the Deadwood Formation comprise reworked quartz arenites of marginal marine environment (Figure 2-9). The Deadwood Formation unconformably overlies the Precambrian basement and is unconformably overlain by the sands of the Black Island Formation followed by the conformable Icebox Formation (Figure 2-3).

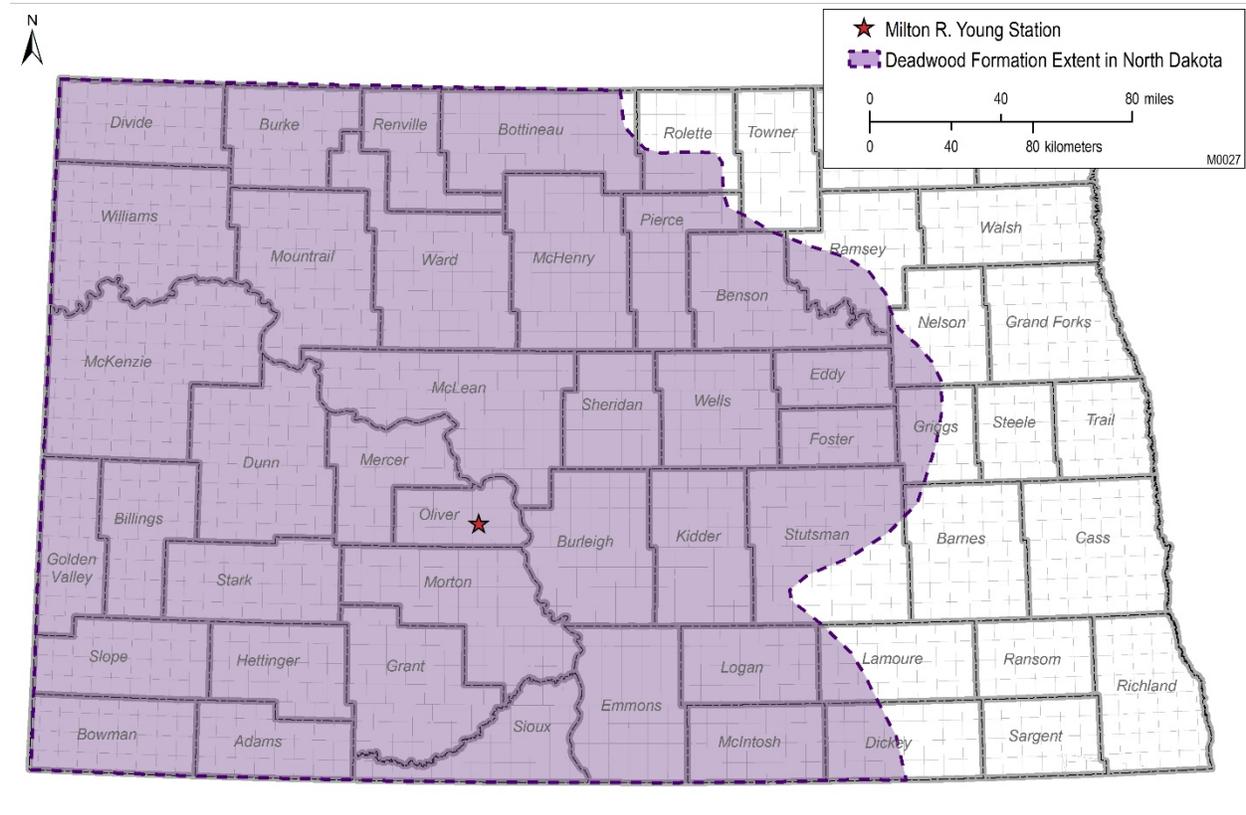


Figure 2-8. Areal extent of the Deadwood Formation in North Dakota (from Nesheim, 2012b). This extent is the same proposed by Nesheim, but the figure was simplified for this application.

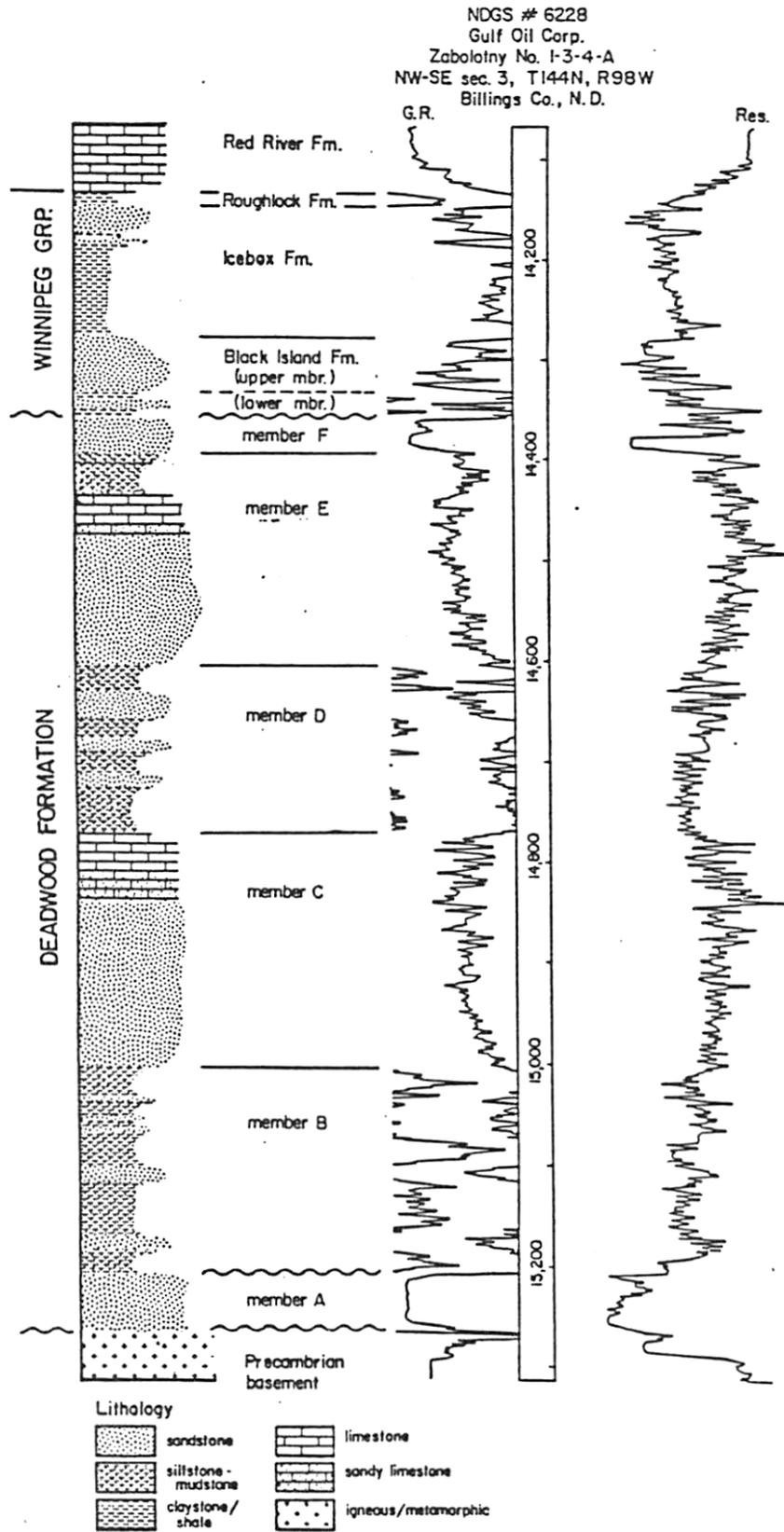


Figure 2-9. Type log showing the interpreted Deadwood members within the Williston Basin (Lefever and others, 1987).

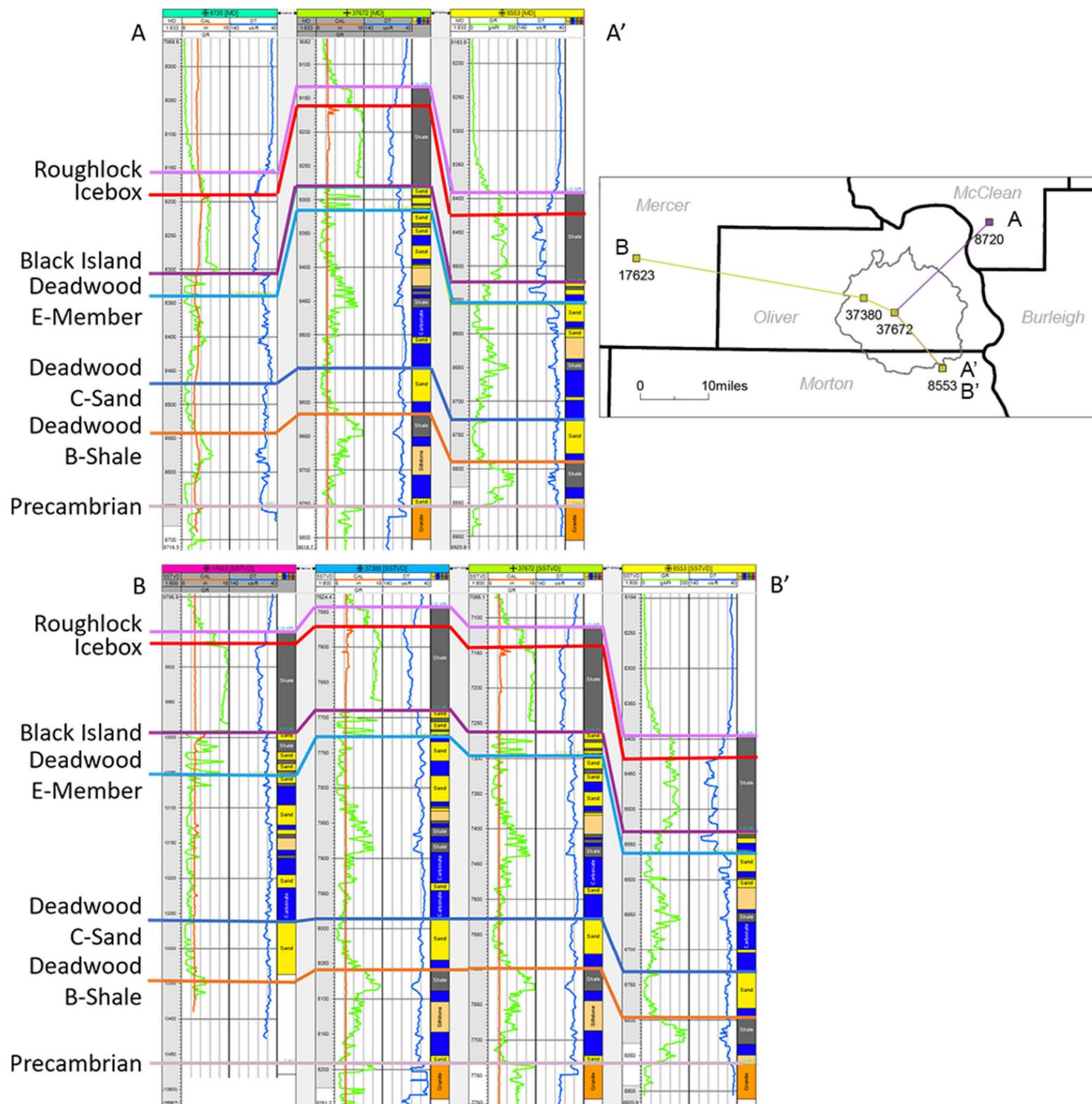


Figure 2-12a. Regional well log stratigraphic cross sections of the Roughlock, Icebox, Black Island, and Deadwood Formations and the Precambrian basement flattened on the top of the Precambrian basement. Logs displayed in tracks from left to right are 1) GR (green) and caliper (red), 2) delta time (blue), and 3) interpreted lithology log.

Note: Wells in these cross sections are spaced evenly. These figures do not portray the relative distance between wells. Because of the spacing, structure may appear more drastic than it actually is.

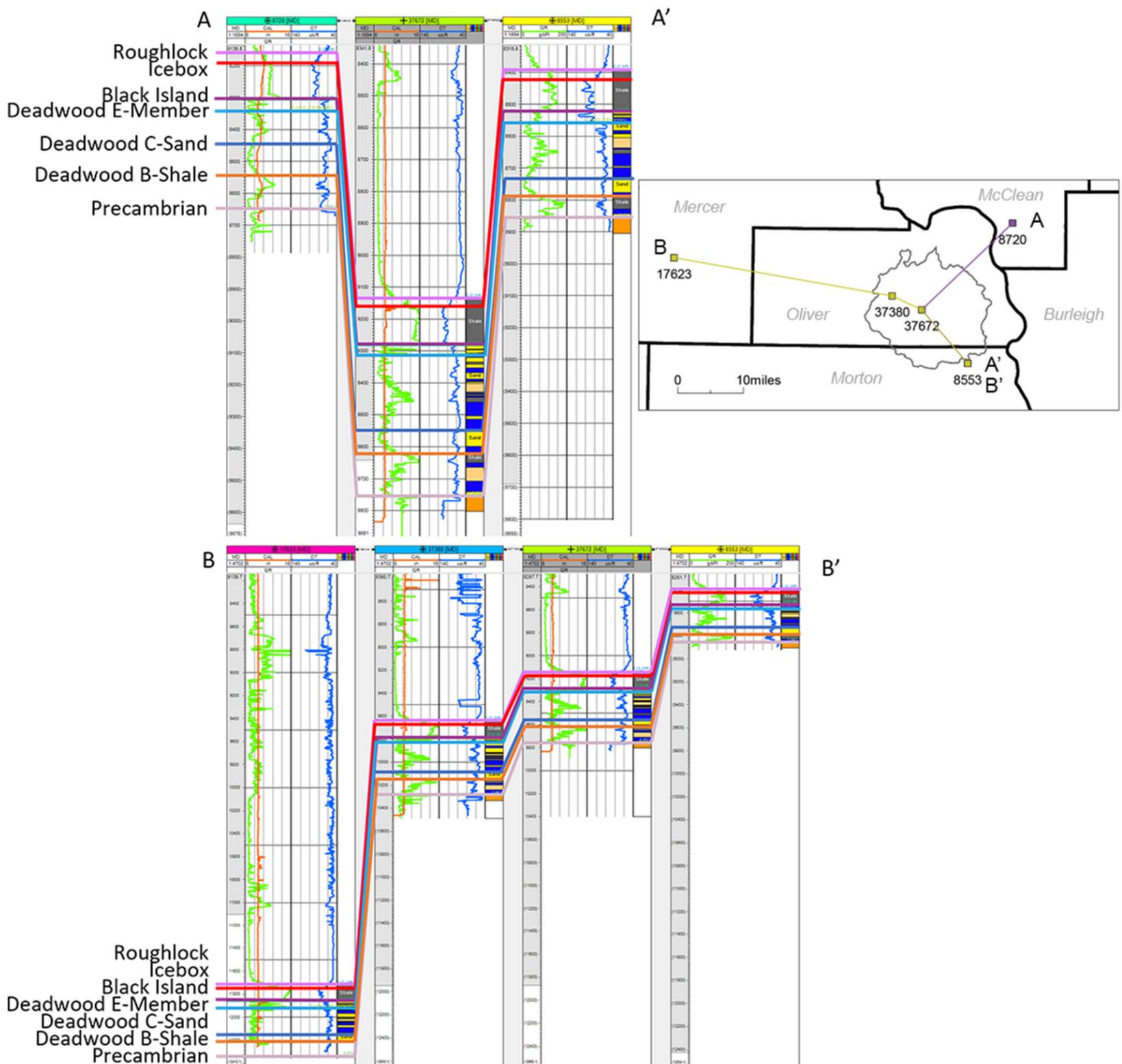


Figure 2-12b. Regional well log cross sections showing the structure of the Roughlock, Icebox, Black Island, and Deadwood Formations and the Precambrian basement **relative to sea level**. Logs displayed in tracks from left to right are 1) GR (green) and caliper (red) and 2) delta time (blue).

Note: Wells in these cross sections are spaced evenly. These figures do not portray the relative distance between wells. Because of the spacing, structure may appear more drastic than it actually is.

The simulations for geochemical evaluation were constrained with a WHP of 2800 psi and a BHP of 6193 psi. However, the BHP is the controlling pressure. The differences in WHP and rate responses were observed from simulations with and without geochemical reactions, shown in Figure 2-22.

The exposure level, expressed in moles per year, of the CO₂ stream to the cap rock used was 4.5 moles/yr. This value is considerably higher than the expected actual exposure level of 2.3 moles/yr (Espinoza and Santamarina, 2017).

Reference

Espinoza, D.N. and Santamarina, J.C., 2017, CO₂ breakthrough—Caprock sealing efficiency and integrity for carbon geological storage. *International Journal of Greenhouse Gas Control*, 66, p. 218–229.

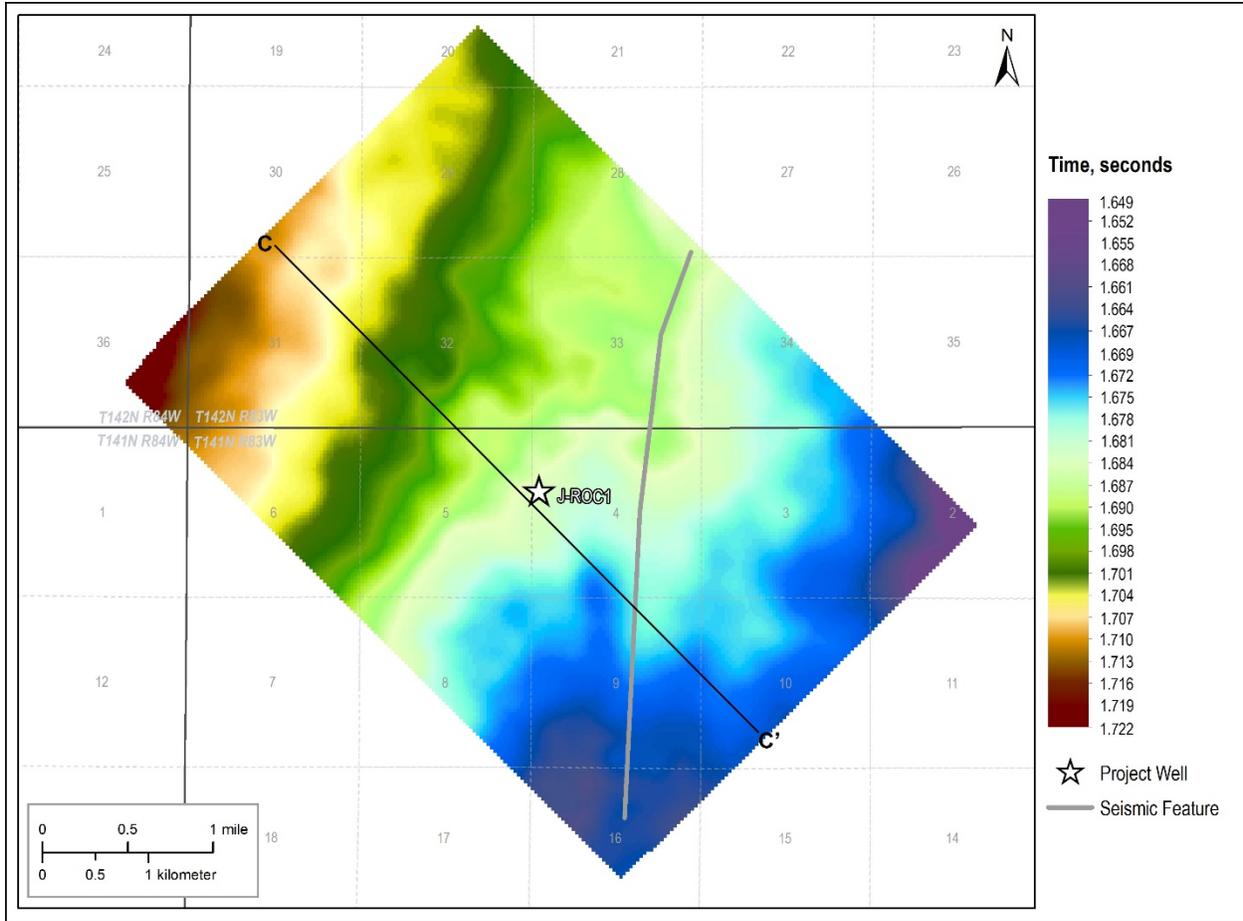


Figure 2-59. Map showing the time structure of the seismic reflection event interpreted to be the top of the Red River Formation. The line shows the location of the interpreted paleochannel that underlies the flexure.

2.5.5.1 Precambrian Fault Geomechanics Study

Geomechanical modeling was done to determine the potential risk of induced seismicity associated with the interpreted Precambrian fault and planned injection activities. The 3D seismic data were used to estimate the dip and strike of the interpreted fault, including uncertainty ranges on both for input into this modeling. A 1D stress model was built from the J-LOC1 well data using the density, compressional sonic, and shear sonic well logs. The pore pressure is assumed equivalent to hydrostatic pressure, with a slight overpressure in the Broom Creek Formation. Overburden stress was estimated by integrating the density data and projecting the density trend to surface. The principal horizontal stresses SH_{min} and SH_{max} were estimated using the modified Eaton poroelastic model from Theircelin and Plumb (1994) and calibrated to closure pressure measurements in the Deadwood, Broom Creek, and Inyan Kara Formations. Static elastic rock property inputs were calibrated to core measurements. The most conservative approach was taken by choosing the largest differential stress model to conduct the analysis, as it represented the highest risk scenario. A stress trend was developed to represent a consistent stress trend through the Deadwood Formation that was an equivalent trend through the highest-magnitude stresses. For the purposes of failure analysis on the existing feature in the seismic interpretation, that stress trend was projected down into the Precambrian basement.

To understand the highest possible risk scenario, the scenario where the interpreted Precambrian fault extends into the Deadwood Formation was considered even though the seismic data do not suggest that it does. Conservative estimates for friction coefficient (30) and cohesion (0) were used in this analysis. Given those conditions and the state of stress modeled in the Deadwood, the failure analysis indicated that a pressure increase of 3,400–4,500 psi would be required to induce shear failure on that feature (Figure 2-61).

The maximum expected pressure change in the Deadwood due to planned injection activities does not exceed 1,800 psi, which is well below the 3,400–4,500-psi pressure threshold for failure (Figure 2-62). Additionally, the injection interval is approximately 120 ft above the Precambrian–Deadwood boundary and the expected pressure change due to planned injection activities at the Precambrian–Deadwood boundary does not exceed 60 psi. Analysis of the geomechanics study results as applied to the characteristics of the interpreted Precambrian fault and site-specific geomechanical data suggests planned injection activities will not cause induced seismicity.

Additionally, sensitivity analysis was run using the publicly available Fault Slip Potential tool using the inputs of friction coefficient, SH_{max} azimuth, fault dip, fault strike, pore pressure, SH_{max} magnitude, SH_{min} magnitude, and overburden magnitude. The results proved insensitive to all inputs except the dip of the fault. At the low-angle dip of the fault, there is very low risk of failure given the interpretation of the state of stress.

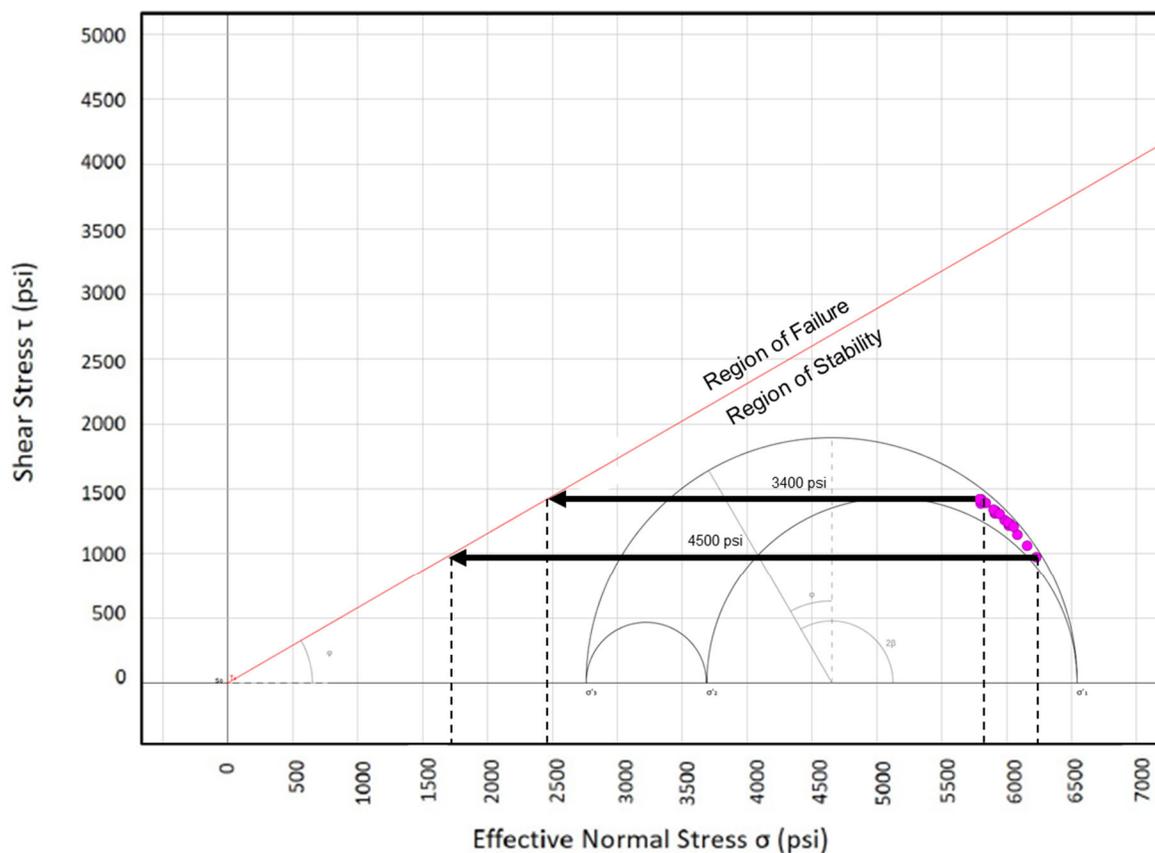
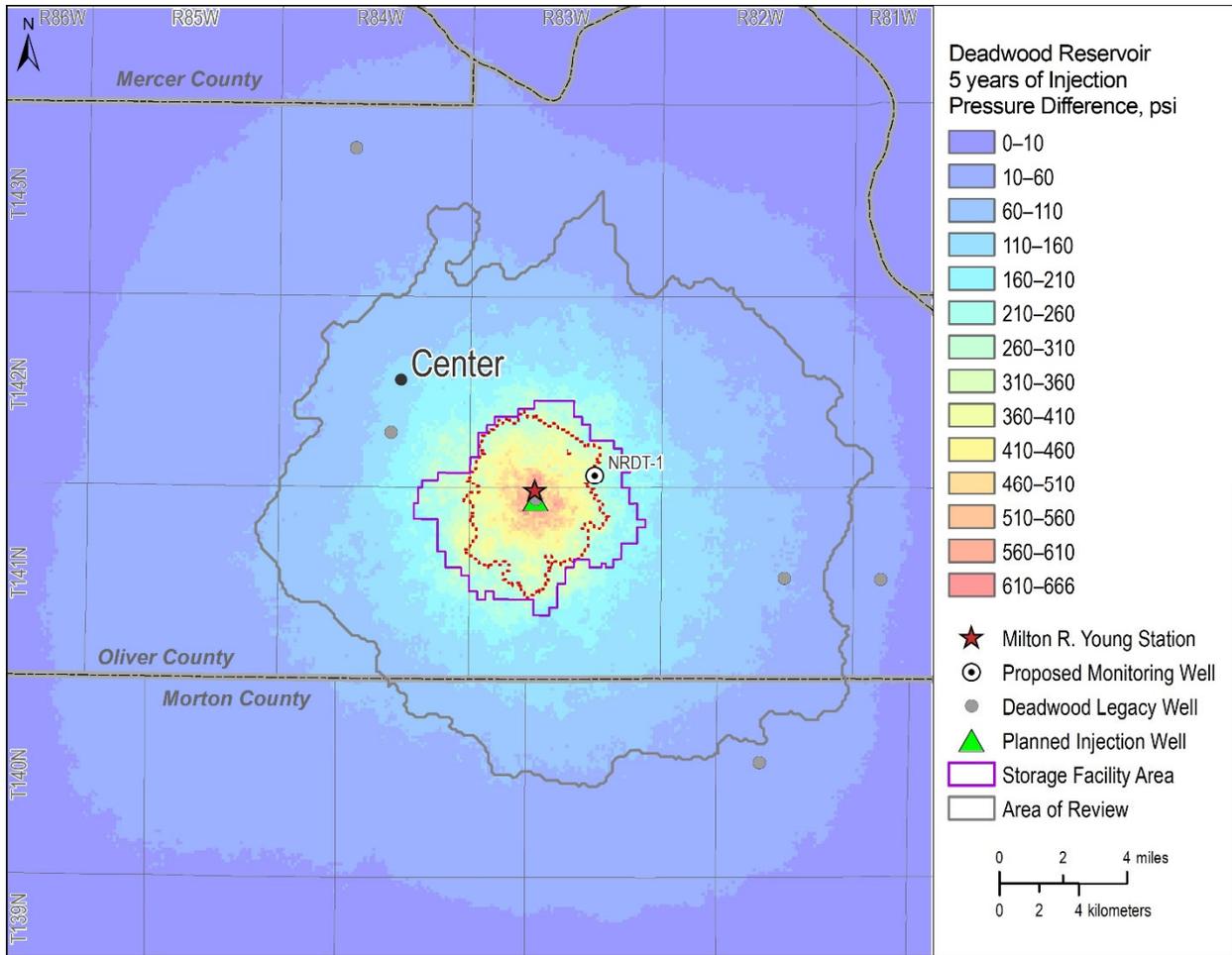
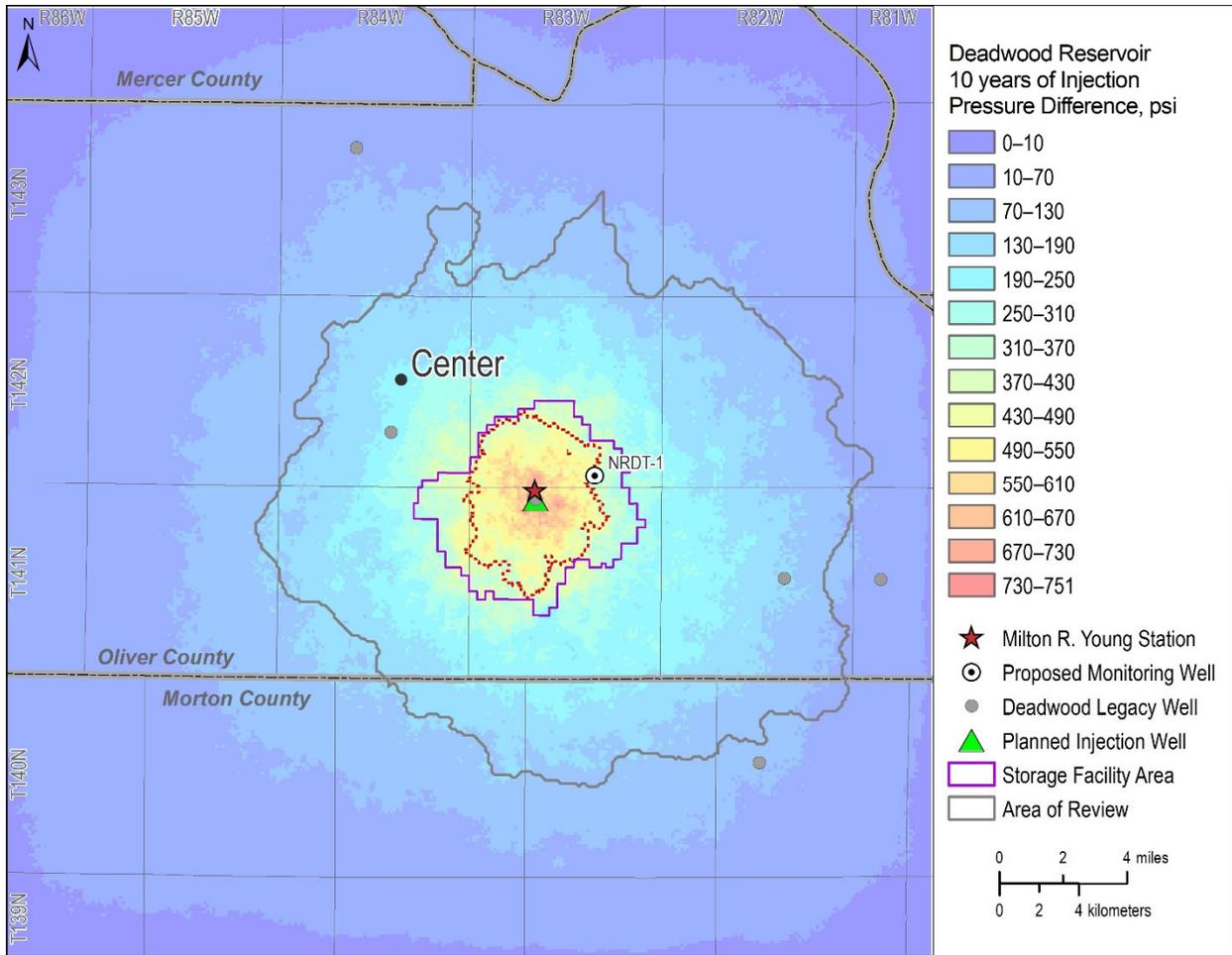
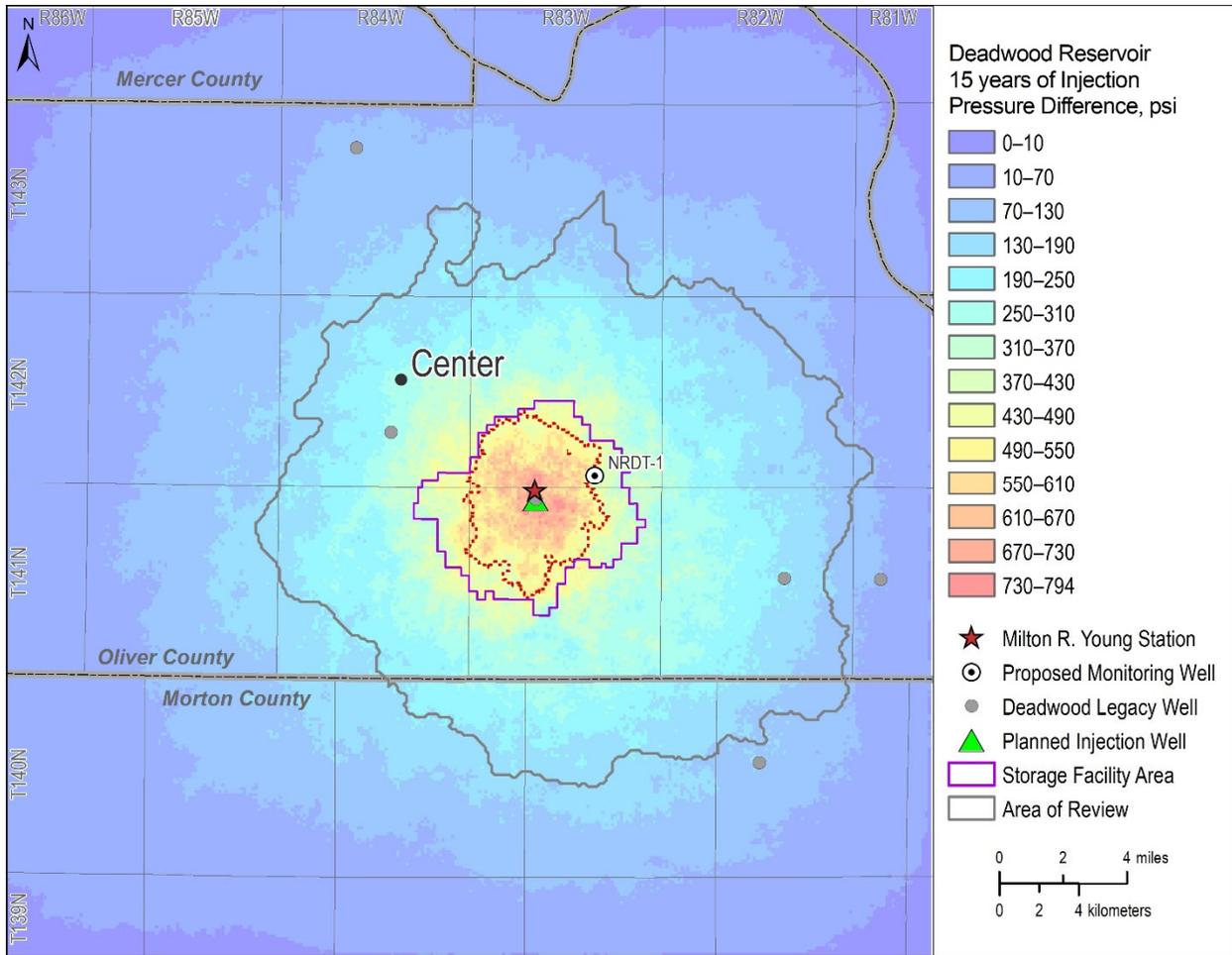


Figure 2-61. Mohr circle depiction of the stress state at the depth of the Deadwood Formation indicates a pressure window of 3400 psi to 4500 psi (pore pressure increase) needed to create failure on faults represented by the pink dots. Pink dots represent the orientation of faults interpreted from reprocessed seismic data relative to in situ stress orientations.







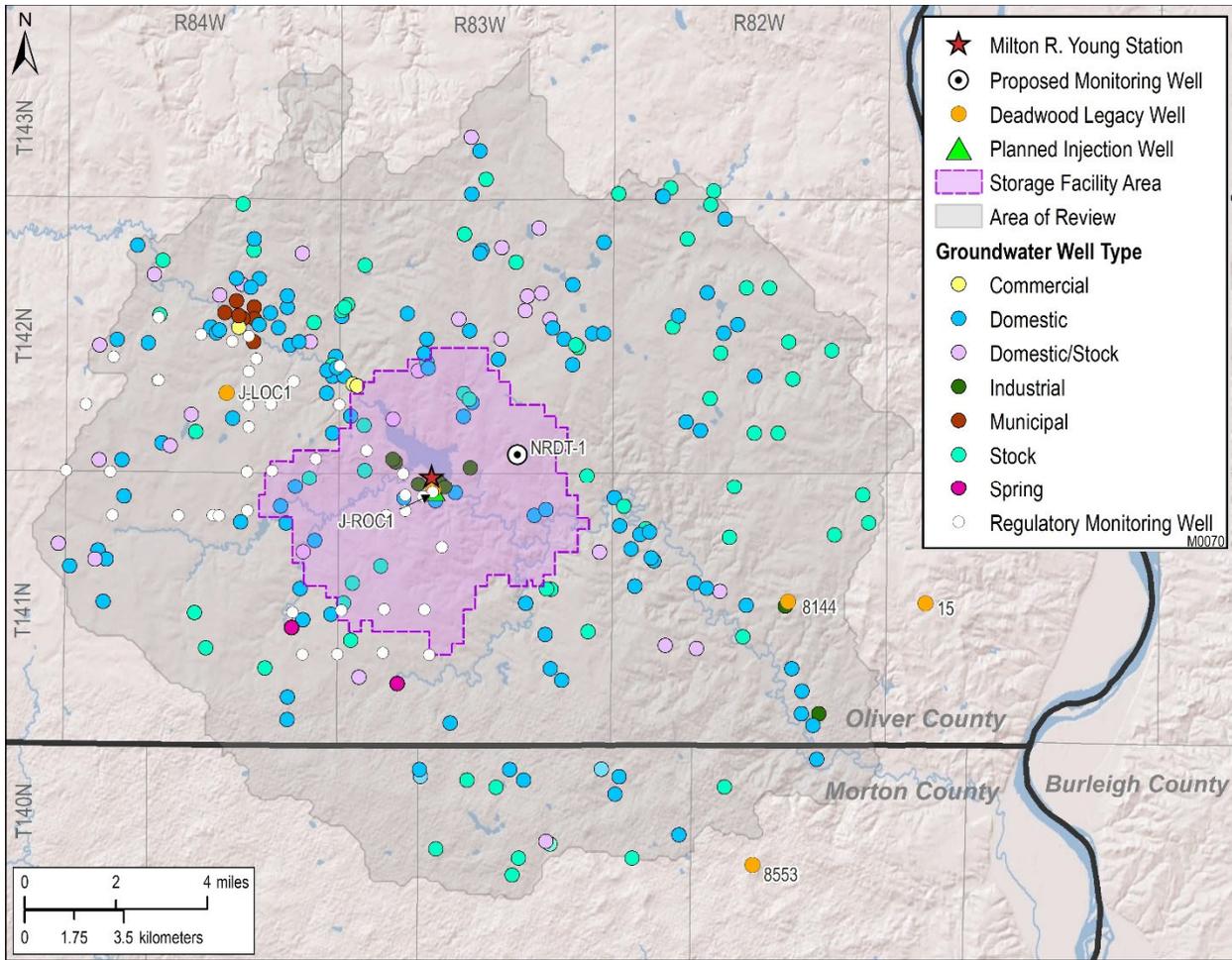


Figure 3-3. AOR map in relation to nearby legacy wells and groundwater wells. Shown are the storage facility area and AOR boundaries.

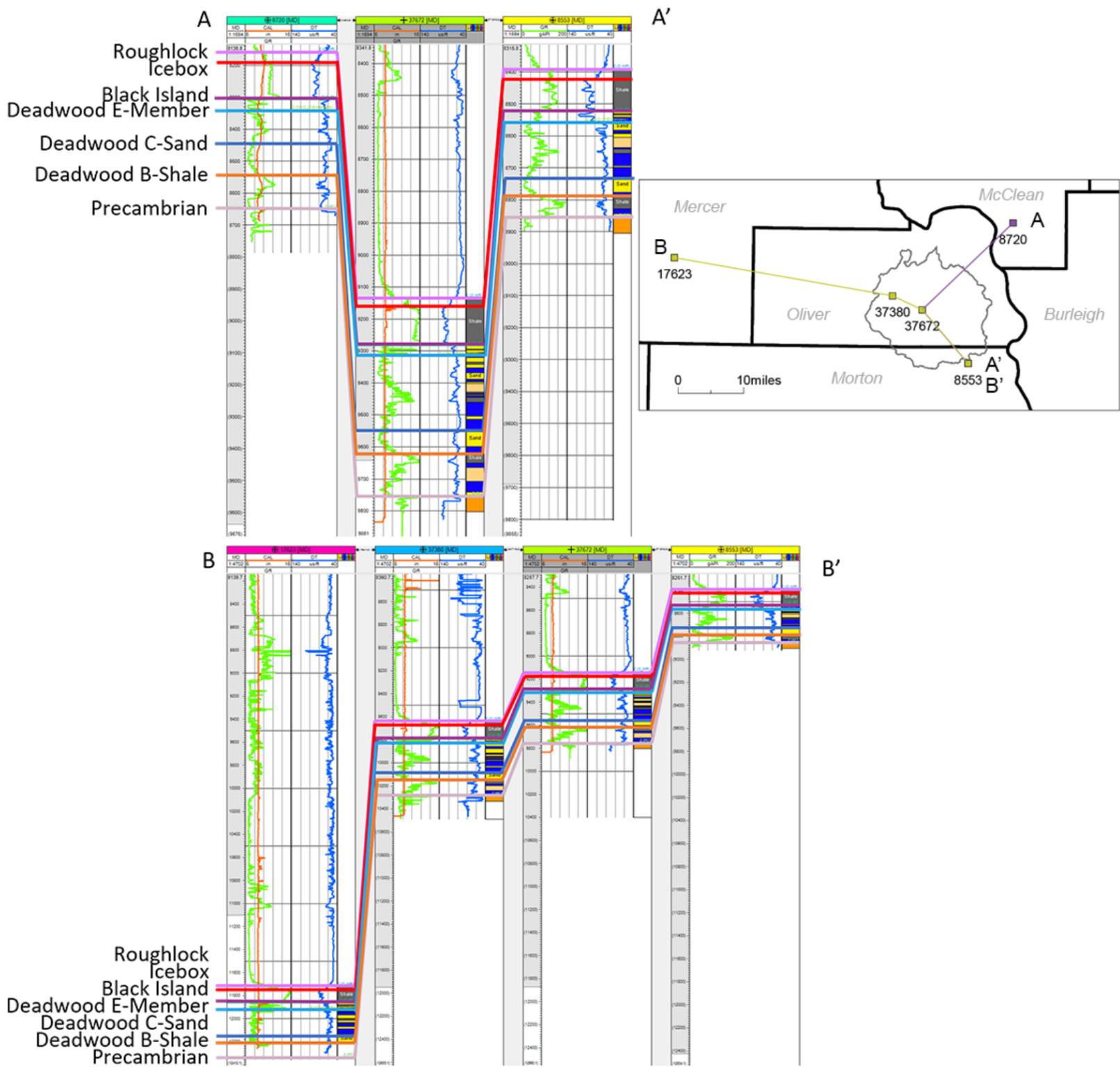


Figure 3-5. Regional well log cross sections showing the structure of the Roughlock, Icebox, Black Island, and Deadwood Formations and the Precambrian basement with an inset map demonstrating the location of the J-LOC1 and J-ROC1 wells. Logs displayed in tracks from left to right are 1) gamma ray (GR, green) and caliper (orange) and 2) delta time (blue), and 3) interpreted lithology log.

Table 3-1. Investigated and Identified Surface and Subsurface Features (Figures 3-1 through 3-5)

Surface and Subsurface Features	Investigated and Identified (Figures 3-1 through 3-5)	Investigated But Not Found in AOR
Producing (active) Wells		X
Abandoned Wells	X	
Plugged Wells or Dry Holes	X	
Deep Stratigraphic Boreholes	X	
Subsurface Cleanup Sites		X
Surface Bodies of Water	X	
Springs	X	
Water Wells	X	
Mines (surface and subsurface)	X	
Quarries		X
Subsurface Structures (e.g., coal mines)	X	
Location of Proposed Wells	X	
Location of Proposed Cathodic Protection Boreholes*		X
Any Existing Aboveground Facilities	X	
Roads	X	
State Boundary Lines		X
County Boundary Lines	X	
Indian Boundary Lines		X
Other Pertinent Surface Features**	X	

* Cathodic protection planned with location TBD.

** Center, North Dakota, city limit boundary.

The type of existing facilities included are:

- Residential - homes.
- Commercial - Milton R. Young, business, storage yard, gun range, golf course.

Well Name: Little Boot 15-44 (NDIC File No. 8144)

Cement Plugs				
Number	Interval (ft)	Thickness (ft)	Volume (sacks)	
1	8,500	8,600	100	35
2	7,720	7,820	100	35
3	7,200	7,300	100	35
4	6,500	6,600	100	35
5	5,450	5,550	100	35
6	5,050	5,150	100	35
7	4,300	4,500	200	100
8	1,587	2,800	1,213	424
9	2	12	10	10

Formation		Cement Plug Remarks
Name	Estimated Top (ft)	
Pierre	1,375	Cement plug 8 isolates the cased hole to the open hole but it does not isolate the 8 3/4" casing shoe or the Fox Hills.
8 3/4" Casing Shoe	2,014	
Greenhorn	2,803	
Mowry	3,177	
Inyan Kara	3,434	No plug within the Inyan Kara Formation
Swift	3,651	
Rierdon	4,038	Cement plug 7 isolates the Broom Creek Formation with 100' within the Broom Creek and 100' within the Opeche
Broom Creek	4,400	
Kibby Lime	5,015	
Icebox	8,440	Cement Plug 2 isolates above the Icebox, Black Island, and Deadwood Formations
Black Island	8,568	Cement Plug 1 isolates above the Black Island and Deadwood Formations.
Deadwood	8,587	

Spud Date: 2/14/1981
Total Depth: 8655 (Deadwood Formation)

Surface Casing:
8 3/4" 36# K-55 casing set at 2014', cement to surface with 935 sacks
Class G cement.

Openhole P&A

Corrective Action: No corrective action is necessary. The Deadwood Formation is isolated mechanically by a series of balanced cement plugs and is located near the outside edge of the AOR. Monitoring at this location may be necessary depending on actual plume growth.

Well Name: J-LOC1 (NDIC File No. 37380)

Casing Program				
Section	Casing Outside Diameter (OD), in.	Weight, lb/ft	Casing Seat, ft	Grade
Surface	9%	40	1,654	K-55
Production	5½	23	10,450	L-80
				13Cr-95

Cementing Program				
Casing, in.	Cement Type	TOC, ft	Excess, %	Volume, sacks
9%	Class C	Surface	100	728
5½	Class G	2,920	100	1,160
	CO ₂ - resistant	4,952		

Completion/Plugging Program			
Item	Description	Length (ft)	Top Depth (ft)
1	Wireline bailed cement	50	3,929
2	2AA CICR	1.73	3,979
3	Perforation	10	4,015
4	2AA CIBP	1.5	4,069
5	Wireline bailed cement	50	4,846
6	2AA CICR	1.73	4,896
7	Perforation	10	4,912
8	Wireline bailed cement	50	9,782
9	2AA CICR	1.73	9,832
10	Perforation	10	9,880

Formation		Remarks
Name	Estimated Top (ft)	
Pierre	1,244	Dual casing and cement isolate the surface section.
9½" Casing Shoe	1,654	
Mowry	3,585	Production casing, cement, CIBP, CICR, and cement above isolate the Inyan Kara Formation.
Inyan Kara	3,881	
Swift	4,057	
Opeche	4,879	Production casing, CO ₂ -resistant cement, CICR and cement above isolate the Broom Creek Formation.
Broom Creek	4,906	
Amsden	5,210	
Icebox	9,665	Production casing, CO ₂ -resistant cement, CICR and cement above isolate the Deadwood and Black Island Formations.
Black Island	9,783	
Deadwood	9,821	
Precambrian	10,297	

Corrective Action: No corrective action is necessary. The Deadwood Formation is isolated mechanically by conventional and CO₂-resistant casing and cement. Perforations in the Deadwood, Broom Creek, and Inyan Kara are isolated by CICRs and cement on top. A mechanical integrity test (MIT) was witnessed and approved by North Dakota State Inspector, Jared Thune, on December 21, 2020.

Spud Date: 5/14/2020
Total Depth: 10,471 ft (Precambrian Basement)

Cased hole TA

Well Name: J-ROC1 (NDIC File No. 37672)

Cement Plugs				
Number	Interval (ft)		Thickness (ft)	Volume (sacks)
1	9,030	9,375	345	241
2	8,150	8,550	400	212
3	7,361	7,830	469	272
4	6,516	7,200	684	241
5	5,215	5,600	385	147
6	4,430	4,770	340	160
7	3,400	3,715	315	145
8	1,715	2,050	335	221
9	28	90	62	46

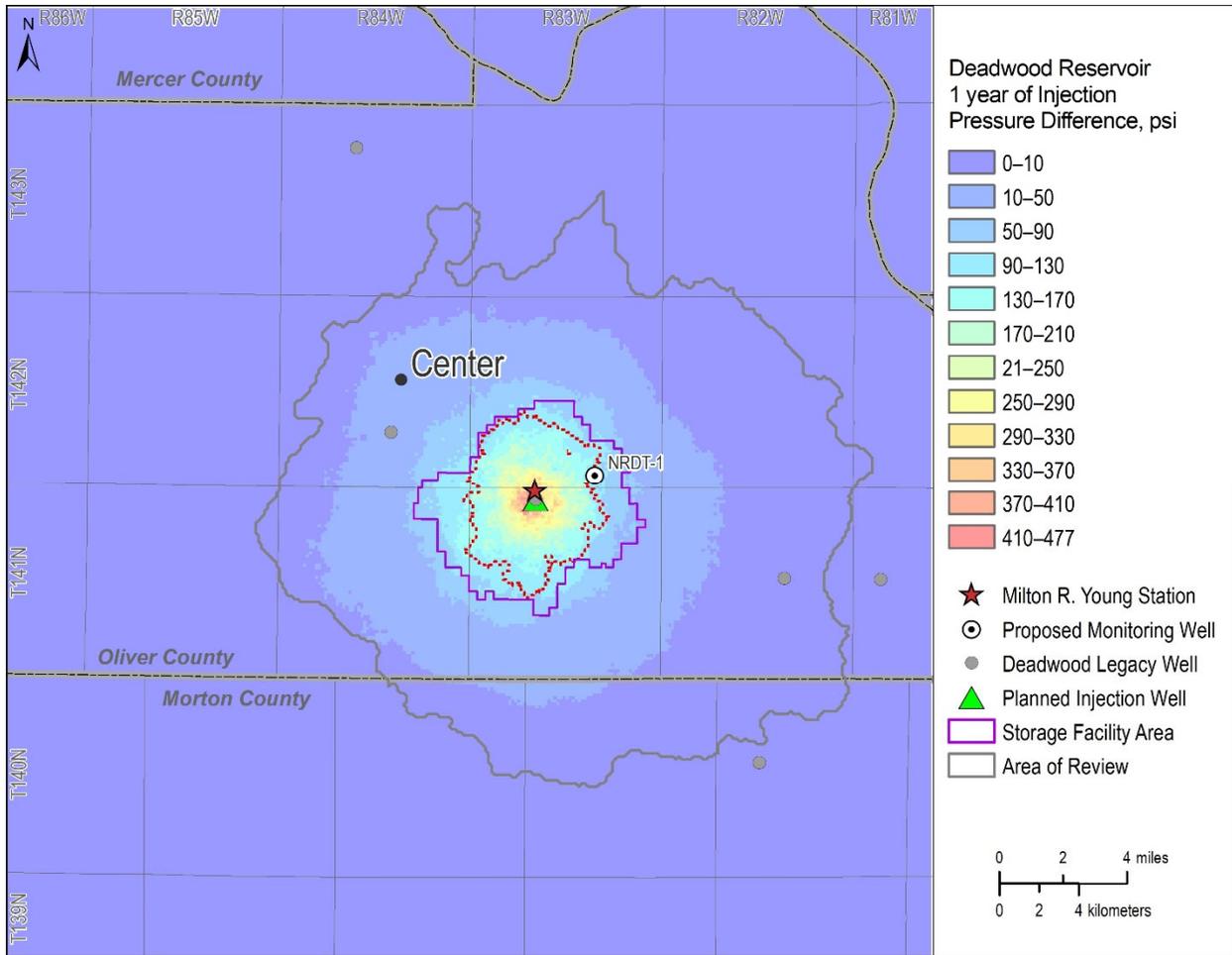
Formation		Cement Plug Remarks
Name	Estimated Top (ft)	
Pierre	1,150	Cement plug 9 isolates the surface.
13 ³ / ₈ " Casing Shoe	2,000	Cement plug 8 isolates the surface casing shoe.
Mowry	3,404	Cement plug 7 isolates above the Inyan Kara Formation and is CO ₂ - resistant.
Inyan Kara	3,686	
Swift	3,865	
Spearfish/Opeche	4,688	Cement plug 6 isolates above the Broom Creek and Spearfish/Opeche Formations.
Broom Creek	4,740	
Amsden	4,974	
Icebox	9,170	Cement plug 1 isolates above the Deadwood, Black Island, and Icebox Formations and is CO ₂ - resistant.
Black Island	9,282	
Deadwood	9,316	
Precambrian	9,762	

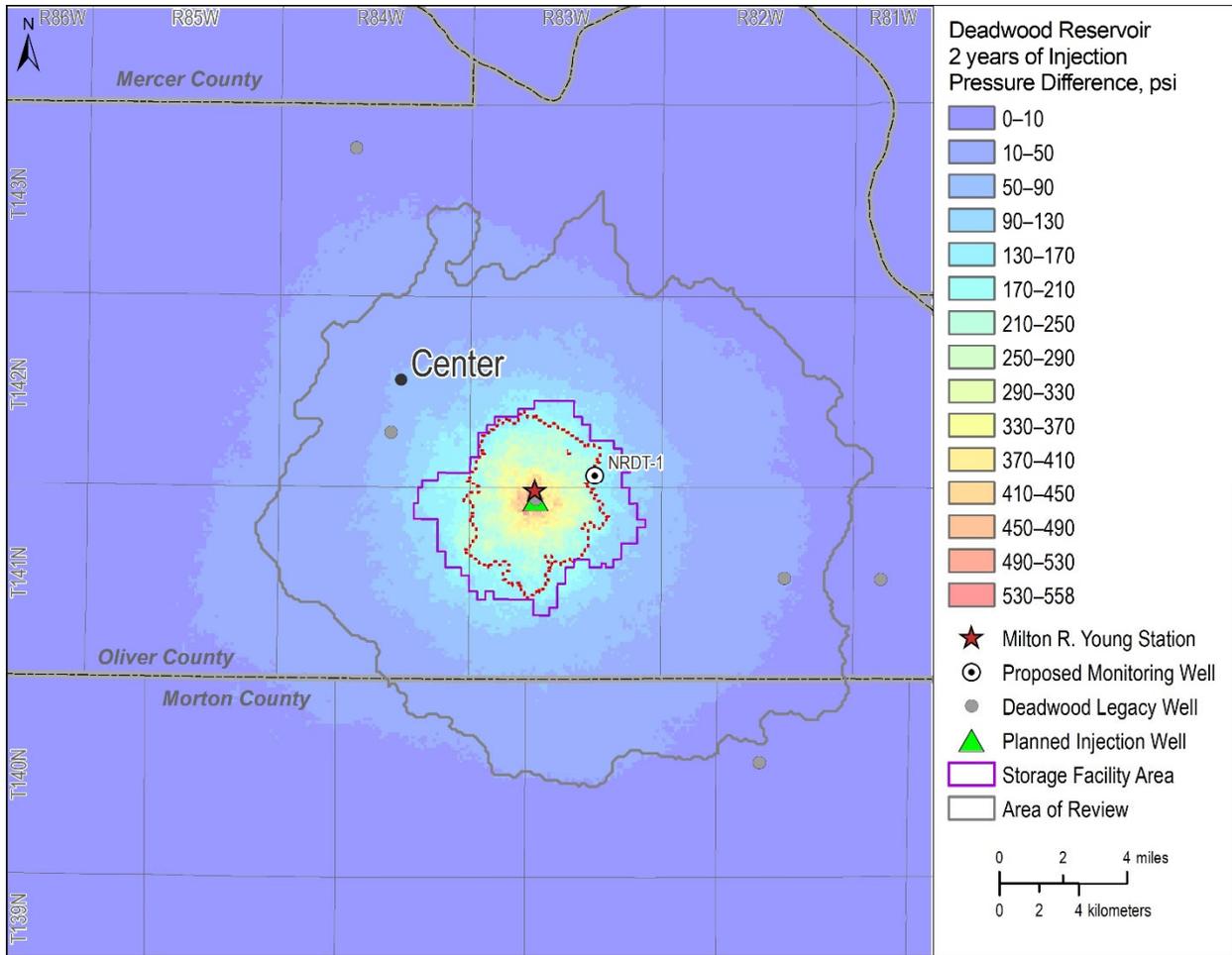
Spud Date: 9/8/2020
Total Depth: 9,871 ft (Precambrian Basement)

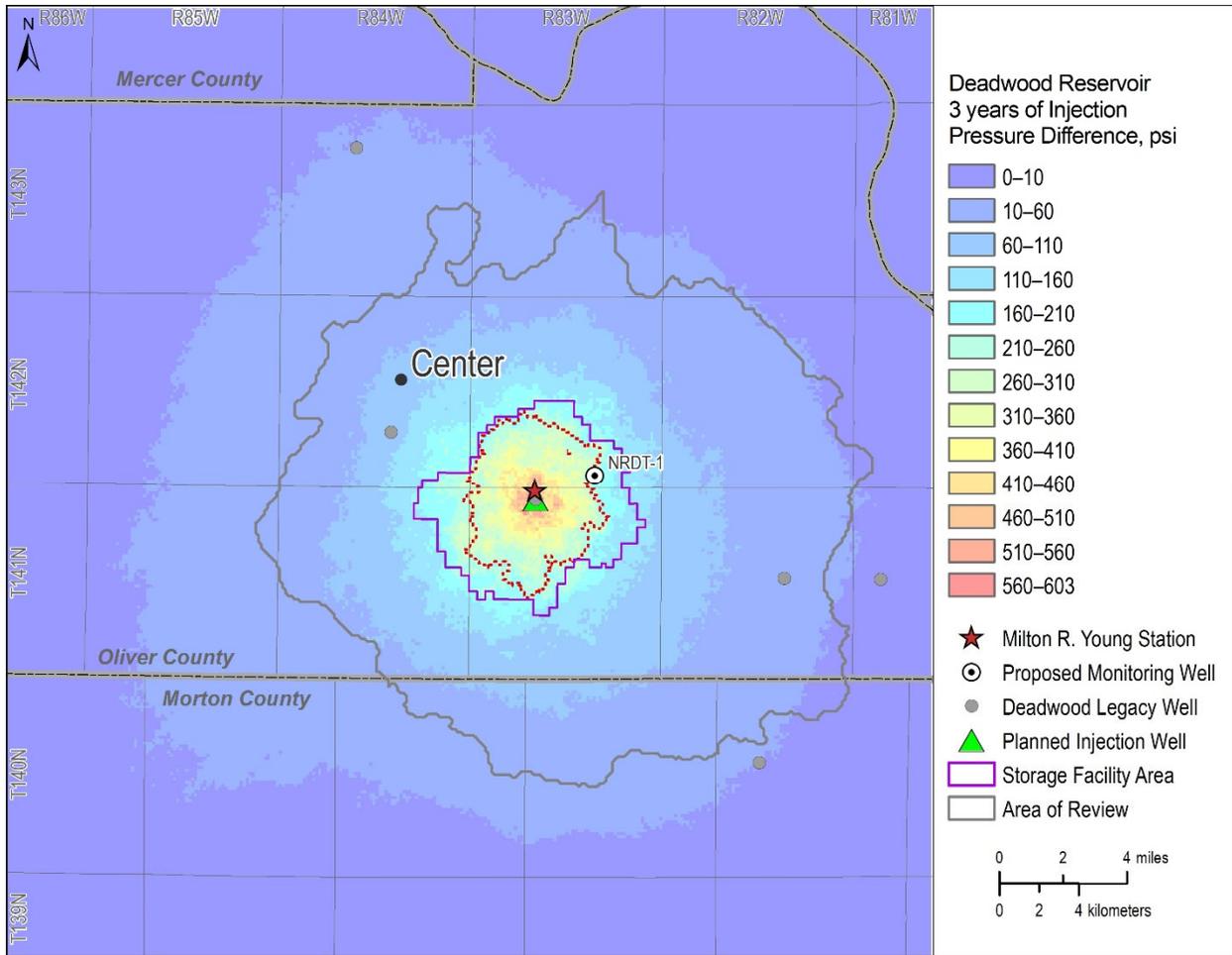
Surface Casing:
13³/₈" 61# K-55 casing set at 2,000 ft, cement to surface with 1,207 sacks Class C cement.

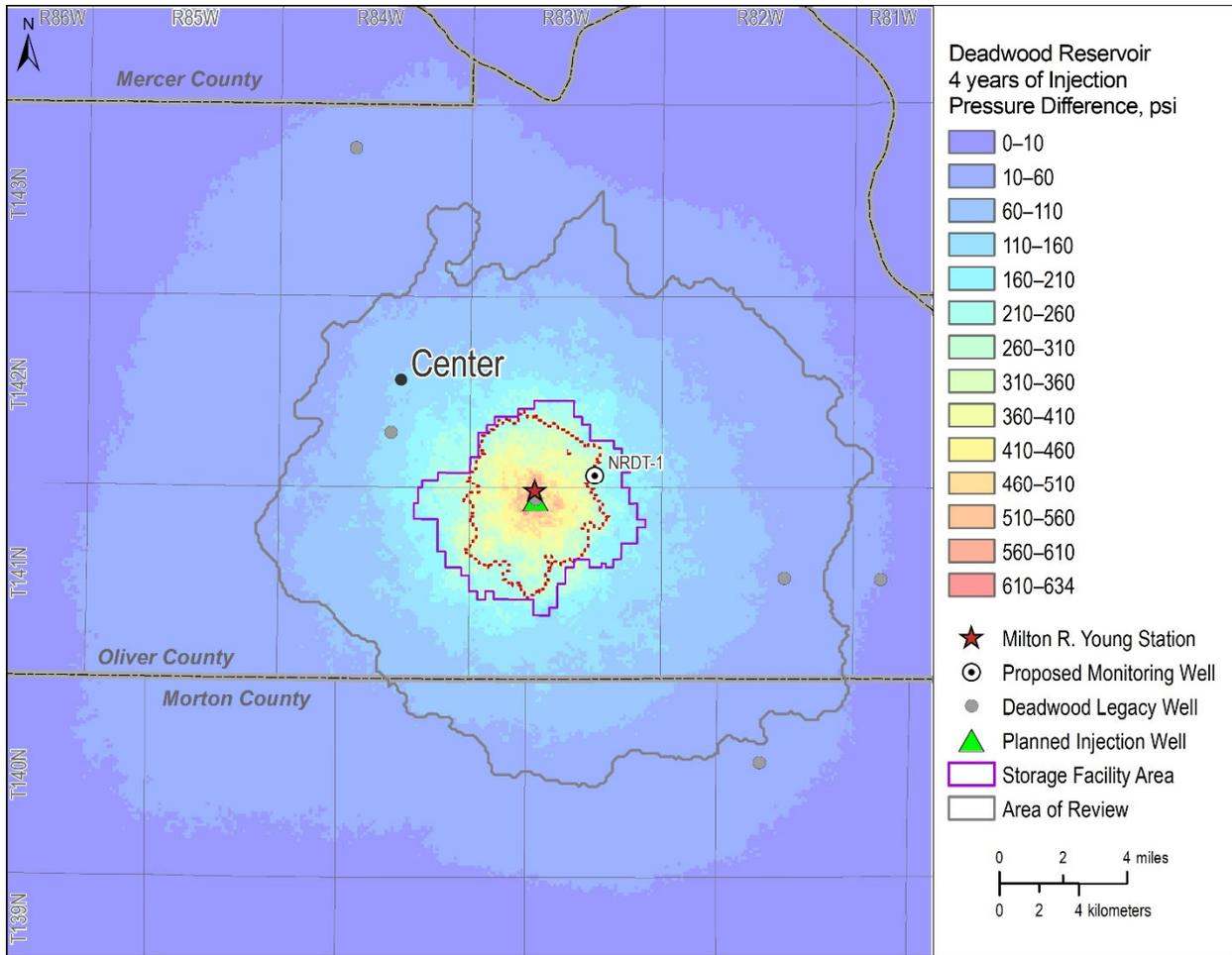
Onenhole TA

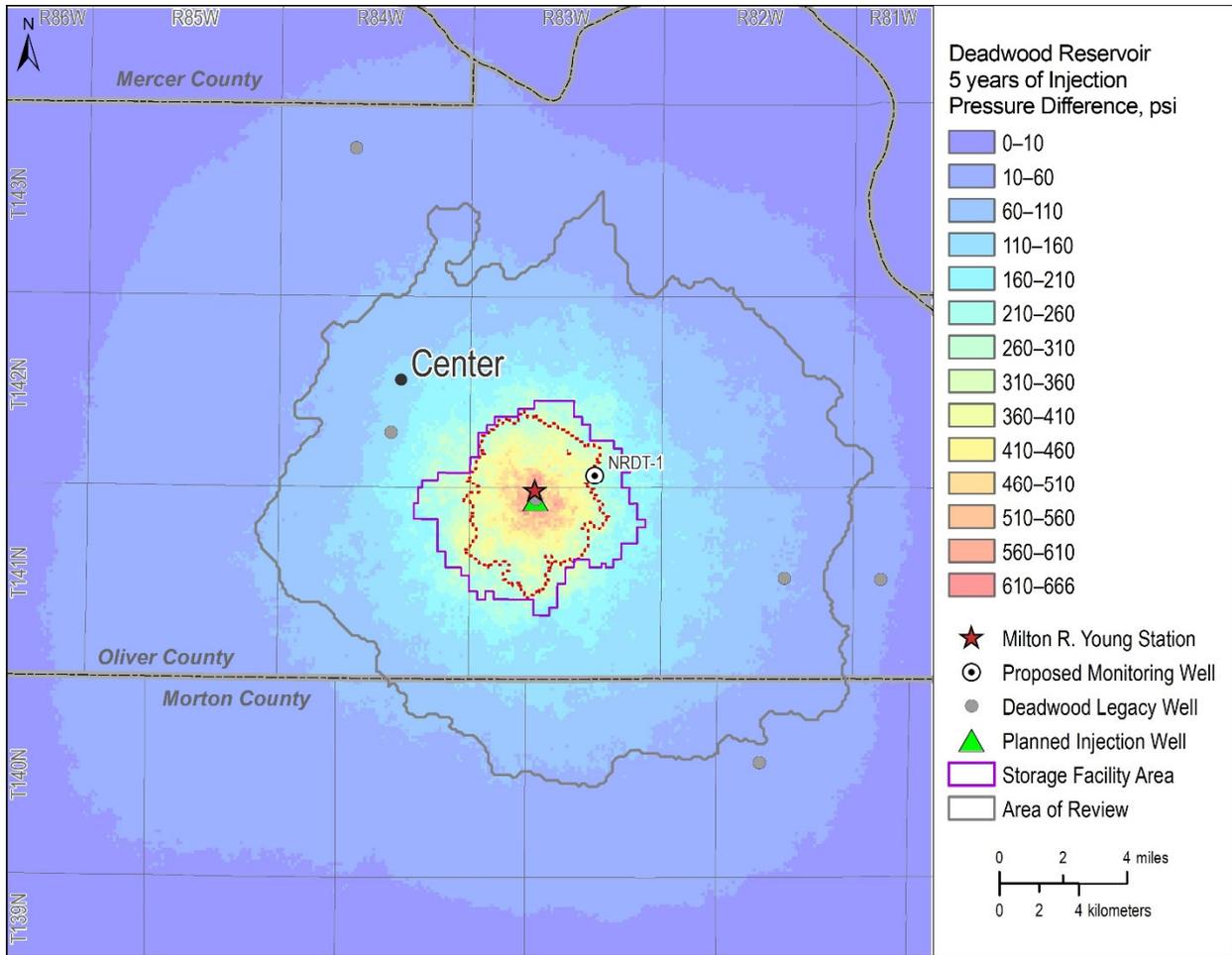
Corrective Action: No corrective action is necessary. The Deadwood Formation is isolated mechanically by a series of conventional and CO₂-resistant balanced cement plugs. Minnkota plans to convert this well into an injection well named Liberty-1 (J-ROC1 NDIC File No. 37672).









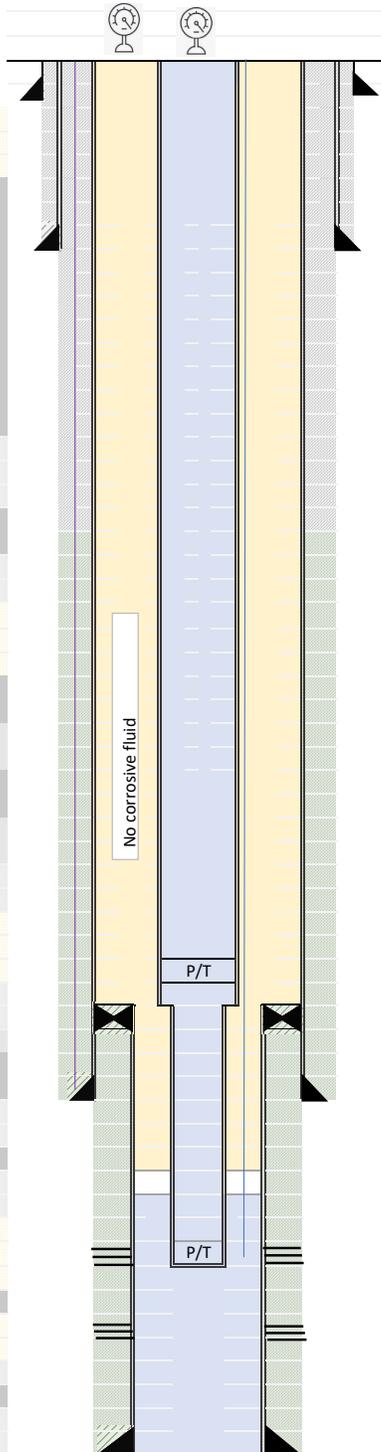


McCall-1 (Deadwood Injector)

KB: 2022 ft / GL:1997 ft

Temp 90 F / Max Pressure 2800psi
Injection Rate 0.7-1.5 Mton/a

Fox Hills	980 ft
Pierre	1150 ft
Greenhorn	3012 ft
Mowry	3404 ft
Skull Creek	3458 ft
Inyan Kara	3686 ft
Swift	3865 ft
Rierdon	4324 ft
Piper-Kline	4484 ft
Piper-Picard	4594 ft
Opeche	4682 ft
Broom Creek	4740 ft
Amsden	4974 ft
Lodgepole	6265 ft
Dawson Bay	7596 ft
Interlake	7933 ft
Icebox	9170 ft
Black Island	9282 ft
Deadwood	9316 ft
Precambrian	9762 ft



Completion:

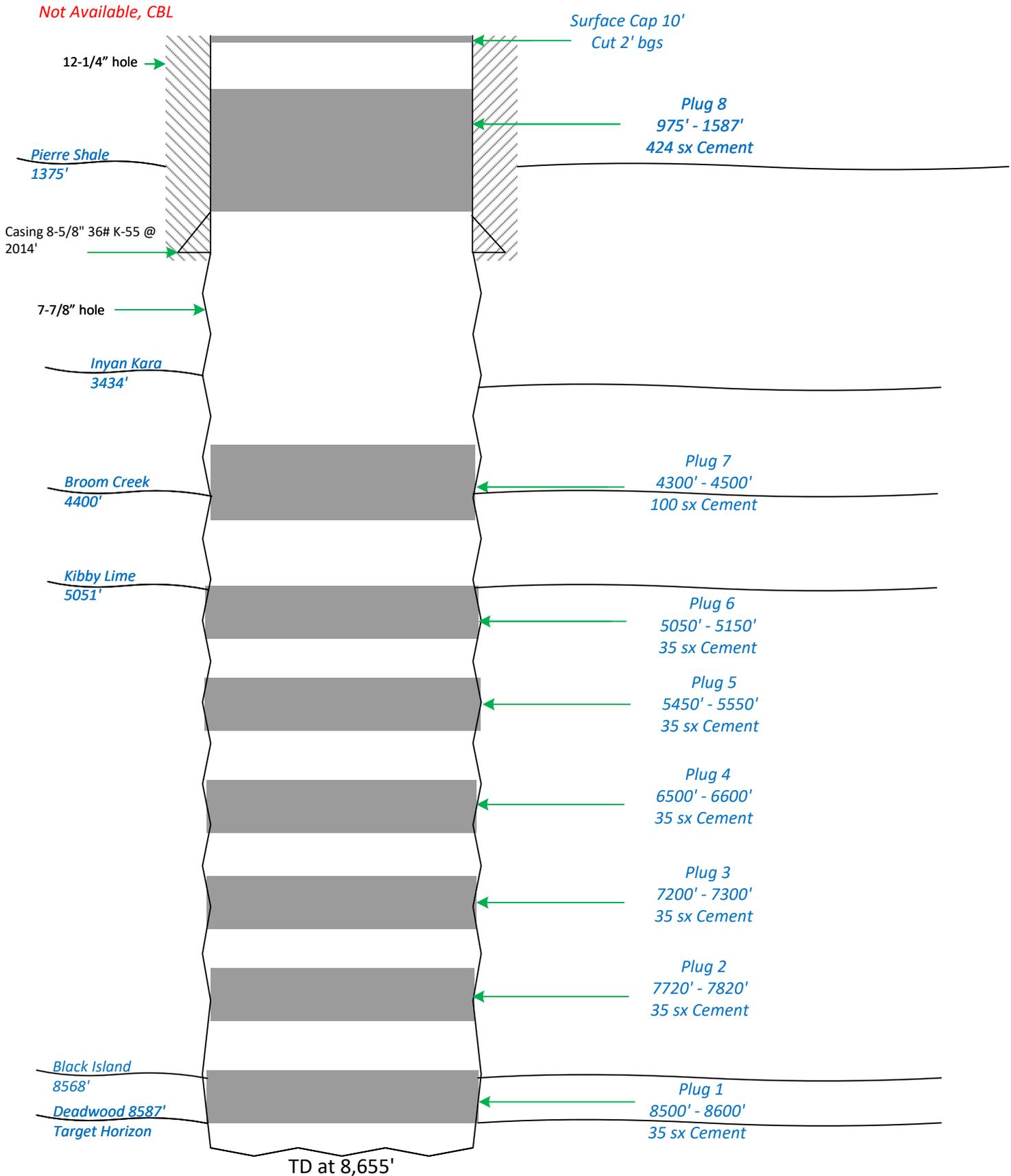
Tubing 5 1/2" 17# L80 coated , Premium Conn @ 7250 ft
X/O
Tubing 4 1/2" 12.6# L80 coated, Premium Conn @9230 ft
Packer 4 1/2" x 7" @ 9230 ft, Nickel Plated, HBNR elastomers
Tail Pipe 4 1/2" 12.6# L80 13 CR Premium Conn

(Packer will be set 100 ft from top perf based on log)
Inhibited Packer Fluid 10 ppg

Casing-deployed Fiber Optic Sensing System DTS-DAS Capable
Tubing-deployed Pressure&Temperature Gauges (2)

LITTLE BOOT 15-44

NDIC Well File No. 8144



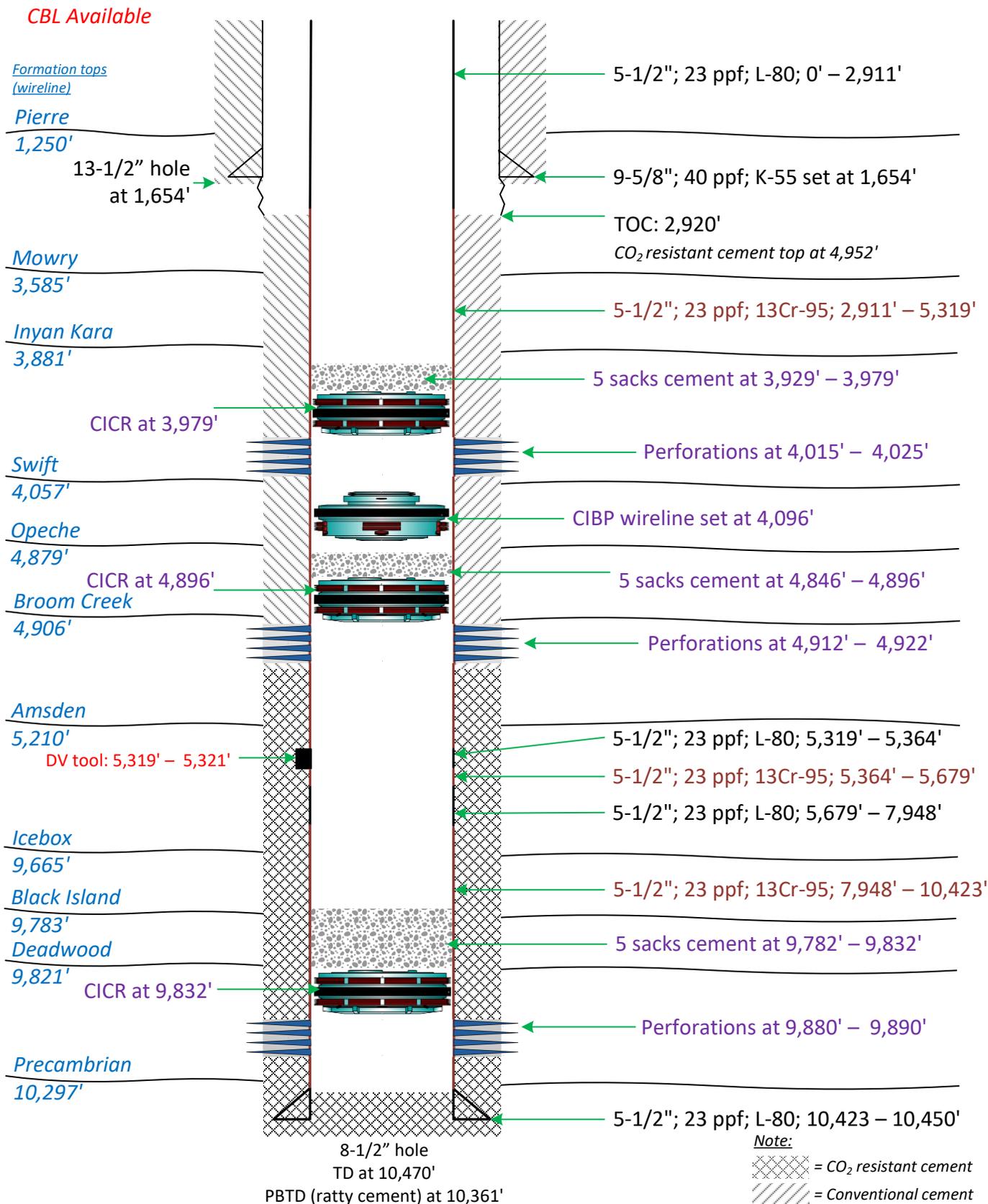
Note:
* Class G cement was used for the cement plug
* Cement yield is 1.15 cuft/sack, all plugs has the same yield value

Not to scale



J-LOC1

NDIC Well File No. 37380



Note:
Updated after injection test concluded on 12/19/2020.
Marker joint at 7,928' - 7,948'

Not to scale

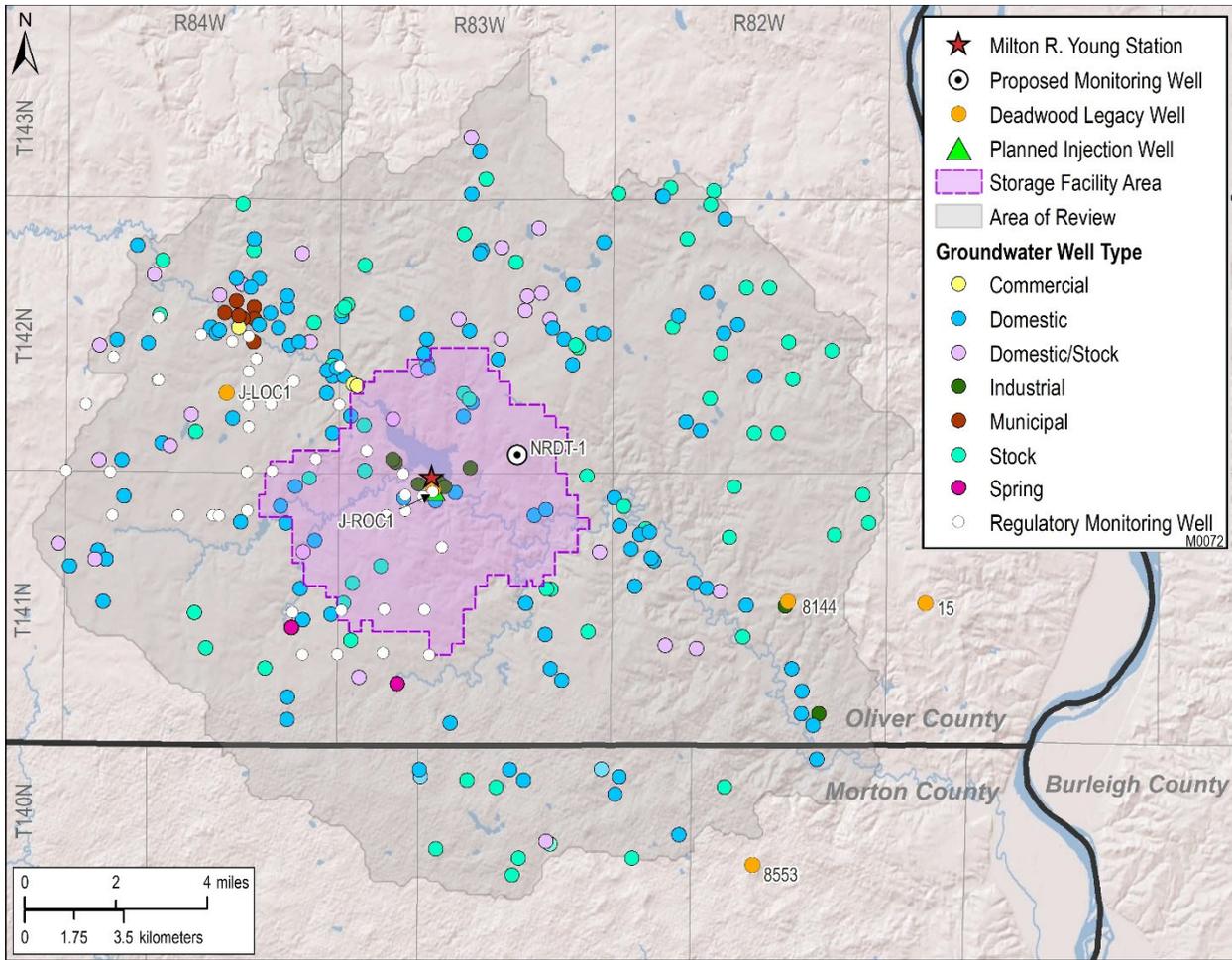


Figure 3-13. Map of water wells in the AOR in relation to the McCall-1 planned injection well, the NRDT-1 proposed monitoring well, storage facility area, AOR, and legacy oil and gas wells.

Stage	Risk	Description	Severity	Likelihood	Monitoring	Control in Place	Potential Response Actions	Response Personnel
Construction Period	Well control event while drilling or completing the well with loss of containment.	This event could occur during drilling and completion operations if the hydrostatic column controlling the well decreases below the formation pressure, allowing fluids to enter the well suddenly.	Serious	Unlikely	<ul style="list-style-type: none"> * Flow sensor. * Pressure sensor. * Tank level indicator. * Tripping displacement practices. * Mud weight control. 	<ul style="list-style-type: none"> * Blowout prevention (BOP) equipment. * Kill fluid. * Well control training. * BOP testing protocol. * Kick drill. * Lubricators for wireline operations. 	<p>Drilling:</p> <ul style="list-style-type: none"> * Stop operation. * Close BOP. * Clear floor and secure area. * Execute well control procedure. * Evaluate drilling parameters to identify root cause. * Continue operations. <p>Completion:</p> <ul style="list-style-type: none"> * Stop operations. * Close BOP. * Clear floor and secure area. * Execute well control procedure. * Continue operations. 	<ul style="list-style-type: none"> * Rig crew * Rig manager * Field superintendent * Project manager
Construction Period	Movement of brine between formations during drilling.	This event could occur if, while drilling the injection target, there is cross flow, with losses into the USDW.	Minor	Unlikely	<ul style="list-style-type: none"> * Tank level sensor. * Mud lab test. * Pressure sensors. * Flow sensors. * Tripping sheets. 	<ul style="list-style-type: none"> * USDW will be covered with the surface casing and set in Pierre Formation. * Casing test after cementing surface casing to check integrity. * FIT test to verify shoe integrity. * Mud used in surface casing are based on fresh water and clays. * CBL to check cement bonding. 	<ul style="list-style-type: none"> * Stop drilling. * Check well level to detect a lost circulation or influx. * In case of losses, treat the well with lost circulation material, and evaluate mud weight and drilling parameters. * In case of influx, control the well, without compromising the shoe integrity. * In case shoe is identified as leaking, squeeze to regain integrity. * In case surface casing shows a leak, squeeze or install a casing patch. 	<ul style="list-style-type: none"> * Rig crew * Rig manager * Field superintendent
Injection Period	Loss of mechanical integrity injection wells – tubing/packer leak	This event could occur because of corrosion, damage in the tubulars during installation, fatigue, higher load profiles, and others and could cause communication of formation fluids with the annular casing tubing as well as sustained casing pressure. There is no LOC in this scenario.	Serious	Likely	<ul style="list-style-type: none"> * Pressure and temperature gauges on surface and downhole real time. * Electromagnetic casing inspection log. * Annular pressure test * CO₂ leak sensors on the wellhead 	<ul style="list-style-type: none"> * Coated tubing. * Inhibited packer fluid in annular. * Corrosion monitoring plan. * Dry CO₂ injected. * Nickel-plated packers. * FF trim tubing hanger and tree. * CR tubing tailpipes below packers. * CR or Inconel carrier for the sensors. * New tubing. 	<ul style="list-style-type: none"> * Trigger alarm by the system, monitoring personnel, or operations engineer. * Follow protocol to stop operation, vent, or deviate CO₂. * Troubleshoot the well. * If tubing leak is detected, discuss with regulator the action plan based on the finding. * Schedule well service to repair tubing. 	<ul style="list-style-type: none"> * Operation engineer * Field superintendent * Project manager
Injection Period Postinjection	Loss of mechanical integrity monitoring wells – tubing/packer leak.	This event could occur because of corrosion, damage in the tubulars during installation, fatigue, higher load profiles, and others and could cause a communication of the formation fluids with the annular casing tubing as well as sustained casing pressure. There is no LOC in this scenario. Monitoring wells are designed to be outside of the projected plume for the majority of the project which reduces the risk of contact with CO ₂ .	Minor	Unlikely	<ul style="list-style-type: none"> * Pressure and temperature gauges on surface and downhole real time. * Electromagnetic casing inspection log. * Annular pressure test. * CO₂ leak sensors on the wellhead. 	<ul style="list-style-type: none"> * Coated tubing. * Inhibited packer fluid in annular. * Corrosion monitoring plan. * Nickel-plated packers * CR tubing below/between packers. * CR or Inconel carrier for the sensors. * New tubing. 	<ul style="list-style-type: none"> * Trigger alarm by the system, monitoring personnel, or operations engineer. * Troubleshoot the well. * If tubing leak is detected, discuss with regulator the action plan for well service. * Schedule well service to repair tubing or abandon the well. 	<ul style="list-style-type: none"> * Operation engineer * Field superintendent * Project manager * Rig crew and DH contractors

Stage	Risk	Description	Severity	Likelihood	Monitoring	Control in Place	Potential Response Actions	Response Personnel
Injection Period	Loss of mechanical integrity injection wells – casing leak.	This event could occur because of corrosion, damage in the tubulars during installation, fatigue, higher load profiles, or others. This event could cause a migration of CO ₂ and brines through the casing, the cement sheet, and into different formations of the injection target or into USDW.	Serious	Unlikely	<ul style="list-style-type: none"> * Pressure and temperature gauges on surface and downhole real time. * Electromagnetic casing inspection log. * CO₂ leak sensors on the wellhead. * DTS fiber real time alongside the casing. * Flow rate monitoring. * Soil gas probes. * Neutron activated logs. * USDW water monitoring. 	<ul style="list-style-type: none"> * CO₂-resistant cement and metallurgic across injection zone. * Injection through tubing and packer. * Nickel-plated packers. * CR or Inconel carrier sensors. * Inhibited packer fluid in the annular. * Cement to surface. * Corrosion monitoring plan. * CBL/USIT after installation. * New casing and tubing installed. 	<ul style="list-style-type: none"> * Trigger alarm by the system, monitoring personnel, or operations engineer. * Follow protocol to stop operation, vent, or deviate CO₂. * Troubleshoot the well. * Evaluate if there is a movement of CO₂ or brines to USDW. In the remote event that USDW gets affected, discuss remediation options with the regulatory agency. * If casing leak is detected, discuss with regulator the action plan based on the finding and location of the leak. * Schedule well service to repair the casing. 	<ul style="list-style-type: none"> * Operation engineer * Field superintendent * Project manager * Rig crew and DH contractors * Remediation contractors
Injection Period Postinjection	Loss of mechanical integrity monitoring wells – casing leak.	This event could occur because of corrosion, damage in the tubulars during installation, fatigue, higher load profiles, and others. This event could cause a migration of CO ₂ and brines through the casing, the cement sheet, and into different formations of the injection target or into USDW. Monitoring wells are designed to be outside of the projected plume for the majority of the project which minimizes the risk of contact with CO ₂ .	Serious	Unlikely	<ul style="list-style-type: none"> * Pressure and temperature gauges on surface and downhole real time. * Electromagnetic casing inspection log. * CO₂ leak sensors on the wellhead. * Soil gas probes. * Neutron activated logs. * USDW water monitoring. 	<ul style="list-style-type: none"> * CO₂-resistant cement across injection zone. * Nickel-plated packers. * CR or Inconel carrier sensors. * Inhibited packer fluid in the annular. * Cement to surface. * Corrosion monitoring plan. * Soil gas probes. * Neutron activated logs. * New casing and tubing installed. 	<ul style="list-style-type: none"> * Trigger alarm by the system, monitoring personnel, or operations engineer. * Troubleshoot the well. * Evaluate if there is a movement of CO₂ or brines to USDW. In the remote event that USDW gets affected, discuss remediation options with the regulatory agency. * If casing leak is detected, discuss with regulator the action plan based on the findings and the location of the leak. * Schedule well service to repair the casing. 	<ul style="list-style-type: none"> * Operation engineer * Field superintendent * Project manager * Rig crew and DH contractors * Remediation contractors
Injection Period	LOC: vertical migration via injection wells.	<p>During the life of the injector wells, there are induced stresses and chemical reactions on the tubulars and cement exposed to the CO₂ pressure and plume.</p> <p>Changes in temperature and injection pressure create stresses in the tubulars trying to expand or contract, and it can lead to microannulus effects.</p> <p>The combination of the dry CO₂ injected and the formation brines creates carbonic acid that reacts with the components of the cement to degrade properties such as permeability, strength, porosity, etc., weakening the matrix.</p> <p>These mechanics could lead to cracks, channels, or simply permeable paths inside the cement that could connect the injection zone with those above the storage complex, causing migration of brines/CO₂.</p>	Serious	Unlikely	<ul style="list-style-type: none"> * CO₂ leak sensors on the wellhead. * DTS fiber real time alongside the casing. * Soil gas probes. * USDW water monitoring. * Neutron activated logs to be run for external MI. * Pressure gauges at surface. * Flow rate monitoring. 	<ul style="list-style-type: none"> * CO₂-resistant cement and metallurgic across injection zone. * Injection through tubing and packer. * Cement to surface. * CBL/USIT after installation. * USDW covered as second barrier with surface casing and surface cement sheet. * New casing installed. 	<ul style="list-style-type: none"> * Trigger alarm by the system, monitoring personnel, or operations engineer. * Follow protocol to stop operation, vent, or deviate CO₂. * Troubleshoot the well. * Evaluate if there is a movement of CO₂ or brines to USDW. In the remote event that USDW gets affected, discuss with regulatory agency remediation options, action plan, and monitoring program. * Discuss with regulator the action plan to repair the well or P&A based on the findings of the assessment. 	<ul style="list-style-type: none"> * Operation engineer * Field superintendent * Project manager * Rig crew and DH contractors * Remediation contractors

Stage	Risk	Description	Severity	Likelihood	Monitoring	Control in Place	Potential Response Actions	Response Personnel
Injection Period Postinjection	LOC: vertical migration via monitoring wells.	<p>During the life of the monitoring wells, there are induced stresses and chemical reactions on the tubulars and cement-exposed brines, pressure plume and, eventually, CO₂.</p> <p>These mechanics could lead to cracks, cement deterioration, channels, or simply permeable paths inside the cement that could connect the injection zone with those above the storage complex, causing migration of brines/CO₂.</p> <p>Monitoring wells are designed to be outside of the plume for the majority of the injection period.</p>	Serious	Unlikely	<ul style="list-style-type: none"> * CO₂ leak sensors on the wellhead. * Soil gas probes. * USDW water monitoring. * Neutron activated logs to be run for external MI. * Pressure gauges at surface. 	<ul style="list-style-type: none"> * CO₂-resistant cement across injection zone. * Cement to surface. * CBL/USIT after installation. * USDW covered as second barrier with surface casing and surface cement sheet. * New casing installed. 	<ul style="list-style-type: none"> * Trigger alarm by the system, monitoring personnel, or operations engineer. * Troubleshoot the well. * Evaluate if there is a movement of CO₂ or brines to USDW. In the remote event that USDW gets affected, discuss with regulatory agency remediation options, action plan, and monitoring program. * Discuss with regulator action plan to repair the well or P&A based on the findings of the assessment. 	<ul style="list-style-type: none"> * Operation engineer * Field superintendent * Project manager * Rig crew and DH contractors * Remediation contractors
Injection Period Postinjection	LOC: vertical migration via water disposal well in Inyan Kara.	This scenario could occur if there is a LOC in the CO ₂ injector well through poor cement or cracks that could allow movement of carbonic acid into the Inyan Kara Formation. Inyan Kara is the main target for water disposal in the area. If carbonic acid gets in contact with the cement and casing for the water disposal well, corrosion and cement degradation could happen, with a potential path to USDW.	Serious	Unlikely	<ul style="list-style-type: none"> * CO₂ leak sensors on the wellhead. * Soil gas probes. * USDW water monitoring. * Neutron activated logs to be run for external MI or tracers. * Pressure gauges at surface. 	<ul style="list-style-type: none"> * Evaluate CO₂-resistant cement through Inyan Kara in the water disposal well. * Validate Class I well will cover USDW to Pierre as well. * Recommended to include water disposal well in corrosion monitoring plan. 	<ul style="list-style-type: none"> * Trigger alarm by the system, monitoring personnel, or operations engineer. * Follow protocol to stop injection. * Troubleshoot the well. * Evaluate if there is a movement of CO₂ or brines to USDW and the source of the leak. * If the injector is the source of the leak, follow protocol for LOC in injectors. * In the remote event that USDW gets affected, discuss with regulatory agency remediation options, action plan, and monitoring program. * Discuss with regulator action plan to repair the well or P&A based on the findings of the assessment. 	<ul style="list-style-type: none"> * Operation engineer * Field superintendent * Project manager * Rig crew and DH contractors * Remediation contractors
Injection Period Postinjection	LOC: vertical migration via legacy wells and P&A wells.	Brines and CO ₂ could migrate through poor cement bonding, cement degradation, or cracking in the cement in P&A wells.	Serious	Unlikely	<ul style="list-style-type: none"> * Soil gas probes. * CO₂ leak sensors. * 4D seismic survey (AOR review periods). 	<ul style="list-style-type: none"> * Legacy wells are properly abandoned for brine movement because of pressurization of injection zone. * Injectors will be abandoned as soon as CO₂ injection in the HUB ends, except if they are left as monitoring wells. 	<ul style="list-style-type: none"> * Trigger alarm by the system, monitoring personnel, or operations engineer. * Evaluate if it's a positive CO₂ release because of a leak in the legacy/P&A well. * Discuss plan with regulator to repair the well, delineate the area, and identify potential resources affected. * Discuss specific remediation actions and monitoring plans. * Execute program, monitor, and evaluate efficacy. 	<ul style="list-style-type: none"> * Operation engineer * Field superintendent * Project manager * Rig crew and DH contractors * Remediation contractors
Injection Period	LOC: vertical migration due to failure of confining rock, faults, or fractures.	This event can occur if, during injection, the pressurization of the injection zone exceeds the sealing capacity of the cap rock/seal above or if there are features such as fault or fractures that are reactivated. CO ₂ and brine could find a leak path to a shallower formation, including USDW.	Serious	Unlikely	<ul style="list-style-type: none"> * USDW water sampling. * 4D seismic survey. * Neutron activated log in injector and monitoring wells. * Gas soil monitoring. 	<ul style="list-style-type: none"> * Seismic survey in the area shows no faults crossing the storage formation or the seal. * Injection is limited to 90% of frac gradient. * Extensive characterization of the rocks show good sealing capacity. * In case cap rock above Broom Creek fails, Inyan Karan underpressure zone will act as a buffer formation before CO₂ or brines reaching USDW. 	<ul style="list-style-type: none"> * Trigger alarm by the system, monitoring personnel, or operations engineer. * Follow protocol to stop injection. * Assess root cause by reviewing monitoring data. * If required, conduct geophysical survey to delineate potential leak path. * Evaluate if there is a movement of CO₂ or brines to USDW. In the event that USDW gets affected, discuss with regulatory agency remediation options, action plan, and monitoring program. * Actions to restore injection will depend on the nature of the leak path and the extent. Operator needs to reevaluate model and discuss action plan with regulator. 	<ul style="list-style-type: none"> * Monitoring staff * Geologist * Reservoir engineer * Project manager * Remediation contractors

Stage	Risk	Description	Severity	Likelihood	Monitoring	Control in Place	Potential Response Actions	Response Personnel
Injection Period Postinjection	LOC: lateral migration of CO ₂ outside defined AoR.	This event could occur if the CO ₂ plume moves faster or in an unexpected pattern and expands beyond the secured pore space for the project and the AoR.	Serious	Unlikely	<ul style="list-style-type: none"> * 4D seismic. * Neutron activated logs in monitoring wells. * Pressure and temperature gauges real time in monitoring wells. 	<ul style="list-style-type: none"> * Detailed geologic model with stratigraphic wells as calibration. * Seismic survey integrated in the model. * Extensive characterization of the rocks and formation. * AoR review and calibration at least every 5 years. * Monitor the plume until stabilization (min 10 years). 	<p>Injection period:</p> <ul style="list-style-type: none"> * Trigger alarm by monitoring staff. * Review monitoring data and trends, and compare with the simulation. * Discuss with regulatory agency the findings, and request to keep injection process while AoR is reviewed, if the data show that CO₂ will stay in the secured pore space. * Perform logging in monitoring wells. * Conduct geophysical survey as required to evaluate AoR. * Recalibrate model, and simulate new AoR. * Assess if additional corrective actions are needed and if it's required to secure additional pore space. * Assess if any remediation is needed, and discuss action plan with regulatory agency. * Present AoR review to regulatory agency for approval and adjust monitoring plan. <p>Postinjection period:</p> <ul style="list-style-type: none"> * Trigger alarm by monitoring staff. * Review monitoring data and trends, compare with the simulation. * Discuss findings with regulatory agency. * Conduct geophysical survey as required to evaluate AoR. * Recalibrate model, and simulate new AoR. * Assess if additional corrective actions are needed and if it's required to secure additional pore space. * Assess if any remediation is needed, and discuss action plan 	<ul style="list-style-type: none"> * Monitoring staff * Geologist * Reservoir engineers * Project manager
Injection Period	External impact – injector well.	This event could occur if, during injection, the wellhead is hit by a massive object that causes major damages to the equipment. The well gets disconnected from the pipeline and from the shutoff system and leads to a loss of containment of CO ₂ and brine.	Major	Unlikely	<ul style="list-style-type: none"> * Pressure, temperature, and flow sensors in real time. * Field inspections. * OGI cameras. 	<ul style="list-style-type: none"> * Fence location and block direct access to the wellhead. * No populated area. * Doubled lined pads. * Location is able to contain 70.000 bbl, and additional transfer pump and lines are designed to move fluid to the settling ponds southwest of the location. 	<ul style="list-style-type: none"> * Trigger alarm by the system or operations staff. * Follow protocol to shut down CO₂ delivery if the automatic shutoff device is not functional. * If there is injured personnel, call emergency team, and execute evacuation protocol. * Contact the field superintendent to activate emergency plan. * Clear the location, and secure the perimeter. If possible, install containment devices around the location. * Contact well control special team to execute blowout emergency plan that may include but is not limited to capping the well, secure location, drill relief well to kill injector, properly repair or abandon injection well. This plan would be discussed with the regulatory agency. * Evaluate environmental impact (soil, water, fauna, vegetation), and present remediation plan to the Commission for approval. * Execute remediation, and install monitoring system as needed. 	<ul style="list-style-type: none"> * Operation engineer * Field superintendent * Project manager * Rig crew and DH contractors * Remediation contractors * Well control specialist

Stage	Risk	Description	Severity	Likelihood	Monitoring	Control in Place	Potential Response Actions	Response Personnel
Injection Period Postinjection	External impact – monitoring well.	This event could occur if the wellhead of the deep monitoring well is hit by a massive object that causes major damages leading to a LOC. Since the well is open to the formation pressure at the injection zone, formation fluids have the potential to flow and spill on the location.	Major	Unlikely	* Pressure, temperature, and flow sensors in real time. * Field inspections. * OGI cameras.	* Fence location, and block direct access to the wellhead. * No populated area. * Lined pads. * Reduced pressure in the monitoring well compared with the injector well on bottom.	* Trigger alarm by the system or operations staff. * If there is injured personnel, call emergency team and execute evacuation protocol. * Contact the field superintendent to activate emergency plan. * Clear the location, and secure the perimeter. If possible, install containment devices around the location. * Contact well control special team to execute blowout emergency plan that may include, but is not limited to, capping the well, securing the location, drilling relief well to kill the injector, properly repairing, or abandoning the injection well. This plan would be discussed with the regulatory agency. * Evaluate environmental impact (soil, water, fauna, vegetation), and present remediation plan to the Commission for approval. * Execute remediation, and install monitoring system as needed.	* Operation engineer * Field superintendent * Project manager * Rig crew and DH contractors * Remediation contractors * Well control specialist
Injection Period	External impact – pipeline.	This event could occur if, during injection, the CO ₂ pipeline is hit, causing major damages and LOC of the CO ₂ .	Major	Unlikely	* Pressure, temperature, and flowmeter sensors in real time. * Field inspections. * OGI cameras?	* Buried pipe. * Bollards and/or concrete barriers installed to protect aboveground piping at valve stations. * Painting for visibility in varied weather conditions. * Signage along right of way as needed. * One-call 811 program.	* Trigger alarm by the system or operations staff. * If there is injured personnel, call emergency team, and execute evacuation protocol. * Verify CO ₂ flow was shut off by the system, or start protocol to stop flow. * Contact the field superintendent to activate emergency plan. * Clear the location, and secure the perimeter. If possible, install containment devices around the location. * Evaluate environmental impact (soil, water, fauna, vegetation), and present remediation plan to the Commission for approval. * Execute remediation, and install monitoring system as needed.	* Operation engineer * Field superintendent * Remediation contractors * Emergency teams * Plant manager/contact
Injection Period	Monitoring equipment failure or malfunction.	If there is a failure on the monitoring system/ alarm devices, it could lead to overpressurization of the system or reservoir beyond the design limits, causing potential fracturing of the reservoir, leaks or failure on equipment and tubulars, and damage of the facilities.	Serious	Unlikely	* Real-time monitoring system and redundancy. * Field inspections.	* Preventive maintenance. * Periodic inspections.	* Trigger alarm by the system or operations staff. * If there is injured personnel or property damage, contact the field superintendent to activate emergency evacuation and secure location. * Assess mechanical integrity of the system, and propose repair actions if needed. * Assess any potential environmental impact, and discuss remedial action with the Commission if needed. * If the assessment allows resuming injection safely, discuss plan with the Commission, and get approval. * Repair or replace instrumentation. Calibrate equipment. * Review monitoring records, and if needed, perform an injectivity test or falloff test to evaluate reservoir.	* Operation engineer * Field superintendent * Project manager * Remediation contractors * Emergency teams * Geologist * Reservoir engineers * Monitoring staff

Stage	Risk	Description	Severity	Likelihood	Monitoring	Control in Place	Potential Response Actions	Response Personnel
Injection Period	Induced seismicity.	This event could occur if pressurization of the reservoir, during injection of CO ₂ , activates preexisting fault planes and creates a displacement that causes a seismic event. If it's a major event, it could compromise the integrity of the wells, facilities, or pipeline.	Major	Unlikely	* Geophones array in surface to monitor induced seismicity. * Geophones/DAS fiber.	* Seismic survey of the storage complex shows no faults that could be reactivated. * A detailed geomechanical model was created to evaluate the storage complex. * The region is seismically stable.	* Trigger alarm by the system or operation staff. * Follow the traffic lighth system described in appendix D, section 2.17.2 * If there is injured personnel or property damages, contact the Field Superintendent to activate emergency evacuation and secure location. * Assess any potential enviromental impact and discussed remedial action with the commission if needed.	* Operation engineer * Field superintendent * Project manager * Remediation contractors * Emergency teams * Geologist * Reservoir engineers * Monitoring staff
Injection Period Postinjection	Major seismic event.	Major natural seismic event.	Major	Unlikely	* Geophones array in surface to monitor induced seismicity. * Geophones/DAS fiber.	* The region is seismically stable.	* Trigger alarm by the system or operation staff. * Follow the traffic lighth system described in appendix D, section 2.17.2 * If there is injured personnel or property damages, contact the Field Superintendent to activate emergency evacuation and secure location. * Assess any potential enviromental impact and discussed remedial action with the commission if needed.	* Operation engineer * Field superintendent * Project manager * Remediation contractors * Emergency teams * Geologist * Reservoir engineers * Monitoring staff

Stage	Risk	Description	Severity	Likelihood	Monitoring	Control in Place	Potential Response Actions	Response Personnel
Injection Period Postinjection	Other major natural disaster.	This scenario could occur in the event of a natural disaster that limits or endangers the normal operation of the Hub.			n/a	n/a	<ul style="list-style-type: none"> * Trigger alarm by the system or operations staff. * If there is injured personnel or property damage, contact the field superintendent to activate emergency evacuation and secure location. * Follow protocol to stop injection. * Assess mechanical integrity of the system, and propose repair actions based on the findings. * Assess any potential environmental impact, and discuss remedial action with the Commission if needed. * If the assessment allows resuming injection safely, increase surveillance to validate effectiveness of the actions. 	<ul style="list-style-type: none"> * Operation engineer * Field superintendent * Project manager * Remediation contractors * Emergency teams * Geologist * Reservoir engineers * Monitoring staff

SUPPLEMENT-DW20

**STORAGE AGREEMENT
TUNDRA DEADWOOD – SECURE GEOLOGIC STORAGE
OLIVER COUNTY, NORTH DAKOTA**

**STORAGE AGREEMENT
TUNDRA DEADWOOD – SECURE GEOLOGIC STORAGE
OLIVER COUNTY, NORTH DAKOTA**

THIS AGREEMENT (“Agreement”) is entered into as of the 1st day of November 1, 2021, by the parties who have signed the original of this instrument, a counterpart thereof, ratification and joinder or other instrument agreeing to become a Party hereto.

RECITALS:

A. It is in the public interest to promote the geologic storage of carbon dioxide in a manner which will benefit the state and the global environment by reducing greenhouse gas emissions and in a manner which will help ensure the viability of the state's coal and power industries, to the economic benefit of North Dakota and its citizens;

B. To further geologic storage of carbon dioxide, a potentially valuable commodity, may allow for its ready availability if needed for commercial, industrial, or other uses, including enhanced recovery of oil, gas, and other minerals; and

C. For geologic storage, however, to be practical and effective requires cooperative use of surface and subsurface property interests and the collaboration of property owners, which may require procedures that promote, in a manner fair to all interests, cooperative management, thereby ensuring the maximum use of natural resources.

AGREEMENT:

It is agreed as follows:

**ARTICLE 1
DEFINITIONS**

As used in this Agreement:

1.1 **Carbon Dioxide** means carbon dioxide in gaseous, liquid, or supercritical fluid state together with incidental associated substances derived from the source materials, capture process and any substances added or used to enable or improve the injection process.

1.2 **Commission** means the North Dakota Industrial Commission.

1.3 **Effective Date** is the time and date this Agreement becomes effective as provided in Article 14.

1.4 **Facility Area** is the land described by Tracts in Exhibit “B” and shown on Exhibit “A” containing 18903.211 acres, more or less.

1.5 **Party** is any individual, corporation, limited liability company, partnership, association, receiver, trustee, curator, executor, administrator, guardian, tutor, fiduciary, or other representative of any kind, any department, agency, or instrumentality of the state, or any governmental subdivision thereof, or any other entity capable of holding an interest in the Storage Reservoir.

1.6 **Pore Space** means a cavity or void, whether natural or artificially created, in any subsurface stratum.

1.7 **Pore Space Interest** is a right to or interest in the Pore Space in any Tract within the boundaries of the Facility Area.

1.8 **Pore Space Owner** is a Party hereto who owns Pore Space Interest.

1.9 **Storage Equipment** is any personal property, lease and well equipment, plants and other facilities and equipment for use in Storage Operations.

1.10 **Storage Expense** is all costs, expense or indebtedness incurred by the Storage Operator pursuant to this Agreement for or on account of Storage Operations.

1.11 **Storage Reservoir** consists of the Pore Space and confining subsurface strata underlying the Facility Area described as the Icebox (Upper Confining Zone), Black Island-Deadwood E Member and Deadwood C member sand (Storage Reservoir/Injection Zone), and Deadwood B member shale (Lower Confining Zone) Formation(s) and which is defined as identified by the well logging suite performed at two stratigraphic wells, J-LOC 1 (File No.37380 and J-ROC1 37672). The log suites included caliper, gamma ray (GR), density, porosity (neutron, density), dipole sonic, resistivity, spectral GR, a combinable magnetic resonance (CMR), and fracture finder log. Further, the logs were used to pick formation top depths and interpret lithology, petrophysical properties, and time-to-depth shifting of seismic data obtained from two 3D seismic surveys covering an area totaling 18.5mi² in and around the J-ROC1(S4 T141 North R83W) and J-LOC 1(S27T142 R84W) stratigraphic wells located in Oliver County, North Dakota. Formation top depths were picked from the top of the Pierre Formation to the top of the Precambrian. These logs and data encompass the stratigraphic interval from an average depth of 9,308 feet to an average depth of 9,850 feet within the limits of the Facility Area.

1.12 **Storage Facility** is the unitized or amalgamated Storage Reservoir created pursuant to an order of the Commission.

1.13 **Storage Facility Participation** is the percentage shown on Exhibit “C” for allocating payments for use of the Pore Space under each Tract identified in Exhibit “B”.

1.14 **Storage Operations** are all operations conducted by the Storage Operator pursuant to this Agreement or otherwise authorized by any lease covering any Pore Space Interest.

1.15 **Storage Operator** is the person or entity named in Section 4.1 of this Agreement.

1.16 **Storage Rights** are the rights to explore, develop, and operate lands within the Facility Area for the storage of Storage Substances.#

1.17 **Storage Substances** are Carbon Dioxide and incidental associated substances, fluids, and minerals.

1.18 **Tract** is the land described as such and given a Tract number in Exhibit “B.”

ARTICLE 2 EXHIBITS

2.1 **Exhibits.** The following exhibits, which are attached hereto, are incorporated herein by reference:

2.1.1 Exhibit “A” is a map that shows the boundary lines of the Tundra Deadwood Facility Area and the tracts therein;

2.1.2 Exhibit “B” is a schedule that describes the acres of each Tract in the Tundra Deadwood Facility Area;

2.1.3 Exhibit “C” is a schedule that shows the Storage Facility Participation of each Tract; and

2.1.4 Exhibit “D” is a form of Surface Use and Pore Space Lease.

2.2 **Reference to Exhibits.** When reference is made to an exhibit, it is to the exhibit as originally attached or, if revised, to the last revision.

2.3 **Exhibits Considered Correct.** Exhibits “A,” “B,” “C” and “D” shall be considered to be correct until revised as herein provided.

2.4 **Correcting Errors.** The shapes and descriptions of the respective Tracts have been established by using the best information available. If it subsequently appears that any Tract, mechanical miscalculation or clerical error has been made, Storage Operator, with the approval of Pore Space Owners whose interest is affected, shall correct the mistake by revising the exhibits to conform to the facts. The revision shall not include any re-evaluation of engineering or geological interpretations used in determining Storage Facility Participation. Each such revision of an exhibit made prior to thirty (30) days after the Effective Date shall be effective as of the Effective Date. Each such revision thereafter made shall be effective at 7:00 a.m. on the first day of the calendar month next following the filing for record of the revised exhibit or on such other date as may be determined by Storage Operator and set forth in the revised exhibit.

2.5 **Filing Revised Exhibits.** If an exhibit is revised, Storage Operator shall execute an appropriate instrument with the revised exhibit attached and file the same for record in the county or counties in which this Agreement or memorandum of the same is recorded and shall also file the amended changes with the Commission.

ARTICLE 3 CREATION AND EFFECT OF STORAGE FACILITY

3.1 **Unleased Pore Space Interests.** Any Pore Space Owner in the Storage Facility who owns a Pore Space Interest in the Storage Reservoir that is not leased for the purposes of this Agreement and during the term hereof, shall be treated as if it were subject to the Surface Use and Pore Space Lease attached hereto as Exhibit “D”.

3.2 **Amalgamation of Pore Space.** All Pore Space Interests in and to the Tracts are hereby amalgamated and combined insofar as the respective Pore Space Interests pertain to the Storage Reservoir, so that Storage Operations may be conducted with respect to said Storage Reservoir as if all of the Pore Space Interests in the Facility Area had been included in a single lease executed by all Pore Space Owners, as lessors, in favor of Storage Operator, as lessee and as if the lease contained all of the provisions of this Agreement.

3.3 **Amendment of Leases and Other Agreements.** The provisions of the various leases, agreements, or other instruments pertaining to the respective Tracts or the storage of the Storage Substances therein, including the Surface Use and Pore Space Lease attached hereto as Exhibit “D”, are amended to the extent necessary to make them conform to the provisions of this Agreement, but otherwise shall remain in effect.

3.4 **Continuation of Leases and Term Interests.** Injection in to any part of the Storage Reservoir, or other Storage Operations, shall be considered as injection in to or upon each Tract within said Storage Reservoir, and such injection or operations shall continue in effect as to each lease as to all lands and formations covered thereby just as if such operations were conducted on and as if a well were injecting in each Tract within said Storage Reservoir.

3.5 **Titles Unaffected by Storage.** Nothing herein shall be construed to result in the transfer of title of the Pore Space Interest of any Party hereto to any other Party or to Storage Operator.

3.6 **Injection Rights.** Storage Operator is hereby granted the right to inject into the Storage Reservoir any Storage Substances in whatever amounts Storage Operator may deem expedient for Storage Operations, together with the right to drill, use, and maintain injection wells in the Facility Area, and to use for injection purposes.

3.7 **Transfer of Storage Substances from Storage Facility.** Storage Operator may transfer from the Storage Facility any Storage Substances, in whatever amounts Storage Operator may deem expedient for Storage Operations, to any other reservoir, subsurface stratum or formation permitted by the Commission for the storage of carbon dioxide under Chapter 38-22 of the North Dakota Century Code. The transfer of such Storage Substances out of the Storage Facility shall be disregarded for the purposes of calculating the royalty under any lease covering a Pore Space Interest (including Exhibit “D”) and shall not affect the allocation of Storage Substances injected into the Storage Facility through the surface of the Facility Area in accordance with Article 6 of this Agreement.

3.8 **Receipt of Storage Substances.** Storage Operator may accept and receive into the Storage Facility any Storage Substances, in whatever amounts Storage Operator may deem expedient for Storage Operations, being stored in any other reservoir, subsurface stratum or formation permitted by the Commission for the storage of carbon dioxide under Chapter 38-22 of the North Dakota Century Code. The receipt of such Storage Substances into the Storage Facility shall be disregarded for the purposes of calculating the royalty under any lease covering a Pore Space Interest (including Exhibit “D”) and shall not affect the allocation of Storage Substances injected into the Storage Facility through the surface of the Facility Area in accordance with Article 6 of this Agreement.

3.9 **Cooperative Agreements.** Storage Operator may enter into cooperative agreements with respect to lands adjacent to the Facility Area for the purpose of coordinating Storage Operations. Such cooperative agreements may include, but shall not be limited to, agreements regarding the transfer and receipt of Storage Substances pursuant to Sections 3.7 and 3.8 of this Agreement.

3.10 **Border Agreements.** Storage Operator may enter into an agreement or agreements with owners of adjacent lands with respect to operations which may enhance the injection of the Storage Substances in the Storage Reservoir in the Facility Area or which may otherwise be necessary for the conduct of Storage Operations.

ARTICLE 4 STORAGE OPERATIONS

4.1 **Storage Operator.** Minnkota Power Cooperative, Inc. is hereby designated as the initial Storage Operator. Storage Operator shall have the exclusive right to conduct Storage Operations, which shall conform to the provisions of this Agreement and any lease covering a Pore Space Interest. If there is any conflict between such agreements, this Agreement shall govern.

4.2 **Successor Operators.** The initial Storage Operator and any subsequent operator may, at any time, transfer operatorship of the Storage Facility with and upon the approval of the Commission.

4.3 **Method of Operation.** Storage Operator shall engage in Storage Operations with diligence and in accordance with good engineering and injection practices.

4.4 **Change of Method of Operation.** As permitted by the Commission nothing herein shall prevent Storage Operator from discontinuing or changing in whole or in part any method of operation which, in its opinion, is no longer in accord with good engineering or injection practices. Other methods of operation may be conducted or changes may be made by Storage Operator from time to time if determined by it to be feasible, necessary or desirable to increase the injection or storage of Storage Substances.

ARTICLE 5 TRACT PARTICIPATIONS

5.1 **Tract Participations.** The Storage Facility Participation of each Tract is shown in Exhibit “C.” The Storage Facility Participation of each Tract shall be based 100% upon the ratio of surface acres in each Tract to the total surface acres for all Tracts within the Facility Area.

5.2 **Relative Storage Facility Participations.** If the Facility Area is enlarged or reduced, the revised Storage Facility Participation of the Tracts remaining in the Facility Area and which were within the Facility Area prior to the enlargement or reduction shall remain in the same ratio to one another.

ARTICLE 6 ALLOCATION OF STORAGE SUBSTANCES

6.1 **Allocation of Tracts.** All Storage Substances injected shall be allocated to the several Tracts in accordance with the respective Storage Facility Participation effective during the period that the Storage Substances are injected. The amount of Storage Substances allocated to each tract, regardless of whether the amount is more or less than the actual injection of Storage Substances from the well or wells, if any, on such Tract, shall be deemed for all purposes to have been injected into such Tract. Storage Substances transferred or received pursuant to Sections 3.7 and 3.8 of this Agreement shall be disregarded for the purposes of this Section 6.1.

6.2 **Distribution within Tracts.** The Storage Substances injected and allocated to each Tract shall be distributed among, or accounted for to, the Pore Space Owners who own a Pore Space Interest in such Tract in accordance with the Pore Space Owners’ Storage Facility Participation effective during the period that the Storage Substances were injected. If any Pore Space Interest in a Tract hereafter becomes divided and owned in severalty as to different parts of the Tract, the owners of the divided interests, in the absence of an agreement providing for a different division, shall be compensated for the storage of the Storage Substances in proportion to the surface acreage of their respective parts of the Tract. Storage Substances transferred or received pursuant to Sections 3.7 and 3.8 of this Agreement shall be disregarded for the purposes of this Section 6.2.

ARTICLE 7 TITLES

7.1 **Warranty and Indemnity.** Each Pore Space Owner who, by acceptance of revenue for the injection of Storage Substances into the Storage Reservoir, shall be deemed to have warranted title to its Pore Space Interest, and, upon receipt of the proceeds thereof to the credit of such interest, shall indemnify and hold harmless the Storage Operator and other Parties from any loss due to failure, in whole or in part, of its title to any such interest.

7.2 **Injection When Title Is in Dispute.** If the title or right of any Pore Space Owner claiming the right to receive all or any portion of the proceeds for the storage of any Storage Substances allocated to a Tract is in dispute, Storage Operator shall require that the Pore Space Owner to whom the proceeds thereof are paid furnish security for the proper accounting thereof to the rightful Pore Space Owner if the title or right of such Pore Space Owner fails in whole or in part.

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7.3 **Payments of Taxes to Protect Title.** The owner of surface rights to lands within the Facility Area is responsible for the payment of any *ad valorem* taxes on all such rights, interests or property, unless such owner and the Storage Operator otherwise agree. If any *ad valorem* taxes are not paid by or for such owner when due, Storage Operator may at any time prior to tax sale or expiration of period of redemption after tax sale, pay the tax, redeem such rights, interests or property, and discharge the tax lien. Storage Operator shall, if possible, withhold from any proceeds derived from the storage of Storage Substances otherwise due any Pore Space Owner who is a delinquent taxpayer an amount sufficient to defray the costs of such payment or redemption, such withholding to be credited to the Storage Operator. Such withholding shall be without prejudice to any other remedy available to Storage Operator.

7.4 **Pore Space Interest Titles.** If title to a Pore Space Interest fails, but the tract to which it relates is not removed from the Facility Area, the Party whose title failed shall not be entitled to share under this Agreement with respect to that interest.

ARTICLE 8 EASEMENTS OR USE OF SURFACE

8.1 **Grant of Easement.** Storage Operator shall have the right to use as much of the surface of the land within the Facility Area as may be reasonably necessary for Storage Operations and the injection of Storage Substances.

8.2 **Use of Water.** Storage Operator shall have and is hereby granted free use of water from the Facility Area for Storage Operations, except water from any well, lake, pond or irrigation ditch of a Pore Space Owner; notwithstanding the foregoing, Storage Operator may access any well, lake, or pond as provided in Exhibit “D”.

8.3 **Surface Damages.** Storage Owner shall pay surface owners for damage to growing crops, timber, fences, improvements and structures located on the Facility Area that result from Storage Operations.

8.4 **Surface and Sub-Surface Operating Rights.** Except to the extent modified in this Agreement, Storage Operator shall have the same rights to use the surface and sub-surface and use of water and any other rights granted to Storage Operator in any lease covering Pore Space Interests. Except to the extent expanded by this Agreement or the extent that such rights are common to the effected leases, the rights granted by a lease may be exercised only on the land covered by that lease. Storage Operator will to the extent possible minimize surface impacts.

ARTICLE 9 ENLARGEMENT OF STORAGE FACILITY

9.1 **Enlargement of Storage Facility.** The Storage Facility may be enlarged from time to time to include acreage and formations reasonably proven to be geologically capable of storing Storage Substances. Any expansion must be approved in accordance with the rules and regulations of the Commission.

9.2 **Determination of Tract Participation.** Storage Operator, subject to Section 5.2, shall determine the Storage Facility Participation of each Tract within the Storage Facility as enlarged, and shall revise Exhibits “A”, “B” and “C” accordingly and in accordance with the rules, regulations and orders of the Commission.

9.3 **Effective Date.** The effective date of any enlargement of the Storage Facility shall be effective as determined by the Commission.

ARTICLE 10 TRANSFER OF TITLE PARTITION

10.1 **Transfer of Title.** Any conveyance of all or part of any interest owned by any Party hereto with respect to any Tract shall be made expressly subject to this Agreement. No change of title shall be binding upon Storage Operator, or any Party hereto other than the Party so transferring, until 7:00 a.m. on the first day of the calendar month following thirty (30) days from the date of receipt by Storage Operator of a photocopy, or a certified copy, of the recorded or filed instrument evidencing such a change in ownership.

10.2 **Waiver of Rights to Partition.** Each Party hereto agrees that, during the existence of this Agreement, it will not resort to any action to partition any Tract or parcel within the Facility Area or the facilities used in the development or operation thereof, and to that extent waives the benefits or laws authorizing such partition.

ARTICLE 11 RELATIONSHIP OF PARTIES

11.1 **No Partnership.** The duties, obligations and liabilities arising hereunder shall be several and not joint or collective. This Agreement is not intended to create, and shall not be construed to create, an association or trust, or to impose a partnership duty, obligation or liability with regard to any one or more of the Parties hereto. Each Party hereto shall be individually responsible for its own obligations as herein provided.

11.2 **No Joint Marketing.** This Agreement is not intended to provide, and shall not be construed to provide, directly or indirectly, for any joint marketing of Storage Substances.

11.3 **Pore Space Owners Free of Costs.** This Agreement is not intended to impose, and shall not be construed to impose, upon any Pore Space Owner any obligation to pay any Storage Expense unless such Pore Space Owner is otherwise so obligated.

11.4 **Information to Pore Space Owners.** Each Pore Space Owner shall be entitled to all information in possession of Storage Operator to which such Pore Space Owner is entitled by an existing lease or a lease imposed by this Agreement.

ARTICLE 12 LAWS AND REGULATIONS

12.1 **Laws and Regulations.** This Agreement shall be subject to all applicable federal, state and municipal laws, rules, regulations and orders.

ARTICLE 13 FORCE MAJEURE

13.1 **Force Majeure.** All obligations imposed by this Agreement on each Party, except for the payment of money, shall be suspended while compliance is prevented, in whole or in part, by a labor dispute, fire, war, civil disturbance, or act of God; by federal, state or municipal laws; by any rule, regulation or order of a governmental agency; by inability to secure materials; or by any other cause or causes, whether similar or dissimilar, beyond reasonable control of the Party. No Party shall be required against his will to adjust or settle any labor dispute. Neither this Agreement nor any lease or other instrument subject hereto shall be terminated by reason of suspension of Storage Operations due to any one or more of the causes set forth in this Article.

ARTICLE 14 EFFECTIVE DATE

14.1 **Effective Date.** This Agreement shall become effective as determined by the Commission.

14.2 **Ipsa Facto Termination.** If the requirements of Section 14.1 are not accomplished on or before April 1, 2022 this Agreement shall *ipso facto* terminate on that date (hereinafter called “termination date”) and thereafter be of no further effect, unless prior thereto Pore Space Owners owning a combined Storage Facility Participation of at least thirty percent (30%) of the Facility Area have become Parties to this Agreement and have decided to extend the termination date for a period not to exceed six (6) months. If the termination date is so extended and the requirements of Section 14.1 are not accomplished on or before the extended termination date this Agreement shall *ipso facto* terminate on the extended termination date and thereafter be of no further effect.

14.3 **Certificate of Effectiveness.** Storage Operator shall file for record in the county or counties in which the land affected is located a certificate stating the Effective Date of this Agreement.

ARTICLE 15 TERM

15.1 **Term.** Unless sooner terminated in the manner hereinafter provided or by order of the Commission, this Agreement shall remain in full force and effect until the Commission has issued a certificate of project completion with respect to the Storage Facility in accordance with § 38-22-17 of the North Dakota Century Code.

15.2 **Termination by Storage Operator.** This Agreement may be terminated at any time by the Storage Operator with the approval of the Commission.

15.3 **Effect of Termination.** Upon termination of this Agreement all Storage Operations shall cease. Each lease and other agreement covering Pore Space within the Facility Area shall remain in force for ninety (90) days after the date on which this Agreement terminates, and for such further period as is provided by Exhibit “C” or other agreement.

15.4 **Salvaging Equipment Upon Termination.** If not otherwise granted by Exhibit “C” or other instruments affecting each Tract, Pore Space Owners hereby grant Storage Operator a period of six (6) months after the date of termination of this Agreement within which to salvage and remove Storage Equipment.

15.5 **Certificate of Termination.** Upon termination of this Agreement, Storage Operator shall file for record in the county or counties in which the land affected is located a certificate that this Agreement has terminated, stating its termination date.

ARTICLE 16 APPROVAL

16.1 **Original, Counterpart or Other Instrument.** A Pore Space Owner may approve this Agreement by signing the original of this instrument, a counterpart thereof, ratification or joinder or other instrument approving this instrument hereto. The signing of any such instrument shall have the same effect as if all Parties had signed the same instrument.

16.2 **Joinder in Dual Capacity.** Execution as herein provided by any Party as either a Pore Space Owner or the Storage Operator shall commit all interests owned or controlled by such Party and any additional interest thereafter acquired in the Facility Area.

16.3 **Approval by the North Dakota Industrial Commission.** Notwithstanding anything in this Article to the contrary, all Tracts within the Facility Area shall be deemed to be qualified for participation if this Agreement is duly approved by order of the Commission.

ARTICLE 17 GENERAL

17.1 **Amendments Affecting Pore Space Owners.** Amendments hereto relating wholly to Pore Space Owners may be made with approval by the Commission.

17.4 **Construction.** This agreement shall be construed according to the laws of the State of North Dakota.

ARTICLE 18
SUCCESSORS AND ASSIGNS

18.1 **Successors and Assigns.** This Agreement shall extend to, be binding upon, and inure to the benefit of the Parties hereto and their respective heirs, devisees, legal representatives, successors and assigns and shall constitute a covenant running with the lands, leases and interests covered hereby.

[Remainder of page intentionally left blank. Signature page follows.]

Executed the date set opposite each name below but effective for all purposes as provided by Article 14.

Dated: November 1, 2021

STORAGE OPERATOR

MINNKOTA POWER COOPERATIVE, INC.

By: _____

Mac McLennan

Its: President and Chief Executive Officer

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71751370.1

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Exhibit A

Tract Map

Attached to and made part of the Storage Agreement
Tundra Deadwood – Secure Geological Storage
Oliver County, North Dakota

Exhibit B

Tract Summary

Attached to and made part of the Storage Agreement
Tundra Deadwood – Secure Geological Storage
Oliver County, North Dakota

Exhibit C

Tract Participation Factors

Attached to and made part of the Storage Agreement
Tundra Deadwood – Secure Geological Storage
Oliver County, North Dakota

Exhibit D

Form of Surface Use and Pore Space Lease

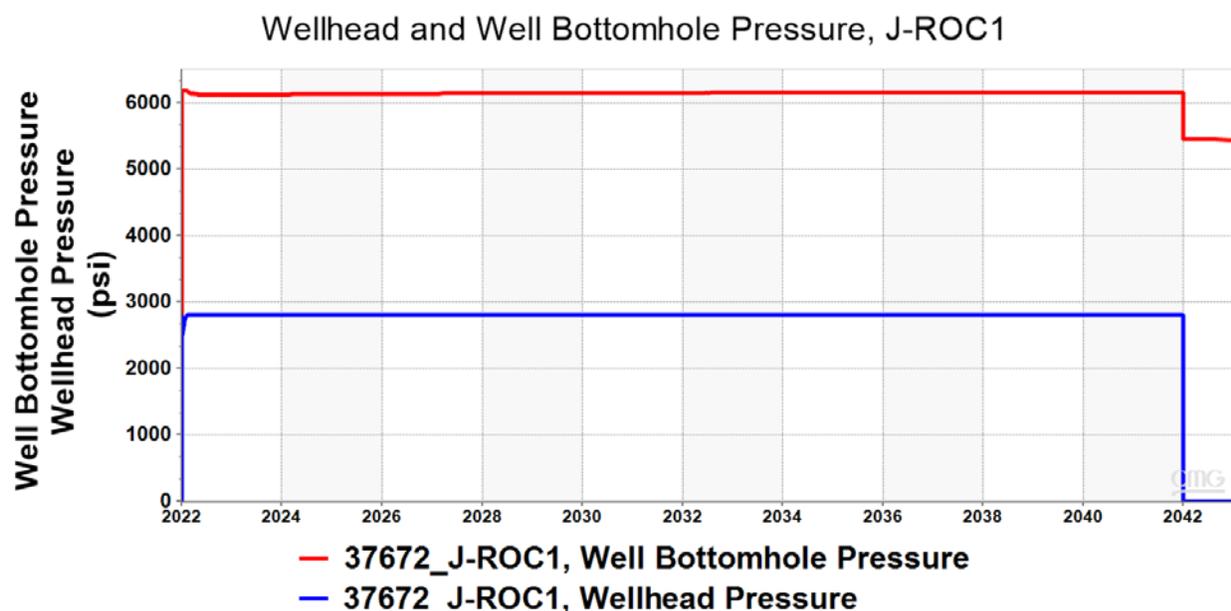
Attached to and made part of the Storage Agreement
Tundra Deadwood – Secure Geological Storage
Oliver County, North Dakota

Simulation Results

Simulations of CO₂ injection with the given well constraints, listed in Table A-4, predicted that the injection bottomhole pressure (BHP) will not exceed 6,179 psi during injection operations, assuming a wellhead pressure (WHP) limit of 2,800 psi (Figure A-13). Results of a stress test performed by an MDT tool in the J-LOC1 wellbore, conducted at a depth of 9,885.1 ft MD, estimated a fracture closure pressure of 7,417 psi, resulting in a fracture propagation gradient of 0.75 psi/ft. The closure pressure gradient was used to calculate maximum BHP constraints, based upon 90% of the fracture closure pressure. Cumulative CO₂ injection at the above-described pressure conditions was approximately 23.4 million metric tons (MMt) over the 20 years of injection. The resulting average injection rate of CO₂ injected into the Black Island and Deadwood Formations over the 20 years of simulated injection was 1.17 MMt per year (Figure A-14).

During and after injection, free-phase (supercritical) CO₂ accounts for the majority of CO₂ observed in the model's pore space, but the mass of free-phase CO₂ declines during the postinjection period. Throughout the injection operation, a portion of the free-phase CO₂ is trapped in the formation's pores through a process known as residual trapping. Residual trapping can occur as a function of low CO₂ saturation and inability to flow under the effects of relative permeability. CO₂ also dissolves into the formation brine throughout injection operations (and continues afterward), although the rate of dissolution slows over time. The relative portions of free-phase, trapped, and dissolved CO₂ can be tracked throughout the duration of the simulation (Figure A-15).

The pressure plume shown in Figure A-16 shows the distribution of pressure increase in the Deadwood Formation during the 20-year injection period. Figure A-16 shows the average increase in pressure after 20 years of injection. The largest increase will appear in the near-wellbore area, where the maximum increase of 1,620 psi is estimated.



will be extended beyond 10 years if it is determined that additional data are required to demonstrate a stable CO₂ plume and safety of USDWs. The nature and duration of that extension will be determined based upon an update of this plan and NDIC approval.

In addition to executing the postinjection monitoring program, the Class VI injection and monitoring wells will be plugged, as described in the plugging plan of this permit application (Section 4.6). All surface equipment not associated with long-term monitoring will be removed, and the surface land of the site will be reclaimed to as close as practical to its original condition. Lastly, following the plume stability demonstration, a final assessment will be prepared to document the status of the site and submitted as part of a site closure report.

4.7.1 Predicted Postinjection Subsurface Conditions

4.7.1.1 Pre- and Postinjection Pressure Differential

Model simulations were performed to estimate the change in pressure in the Deadwood Formation during and after the cessation of CO₂ injection. The simulations were conducted for 20 years of CO₂ injection at a rate of 1.17 MMt per year, followed by a postinjection period of 10 years.

Figure 4-16 shows the predicted pressure differential at the conclusion of 20 years of CO₂ injection. As shown, at the time that CO₂ injection operations have stopped, the model predicts an increase in the pressure of the reservoir, with a maximum pressure differential of 0 to 1640 psi at the location of the injection well. It is important to note that this maximum pressure increase is not sufficient to move formation fluids from the storage reservoir to the deepest USDW. The details of this pressure evaluation are provided as part of the AOR delineation of this permit application (see Appendix A).

A description of the predicted decrease in this pressure profile of the Deadwood Formation over the 10-year postinjection period is provided in Figure 4-17. As expected, the pressure in the reservoir gradually decreases over time following the cessation of CO₂ injection, with the pressure at the injection well after 10 years of postinjection predicted to decrease 414.3 to 1,318.18 psi compared to the pressure at the time CO₂ injection was terminated. This trend of decreasing pressure in the storage reservoir is anticipated to continue over time until the pressure of the storage reservoir approaches the original storage reservoir pressure conditions prior to any CO₂ injection activities.

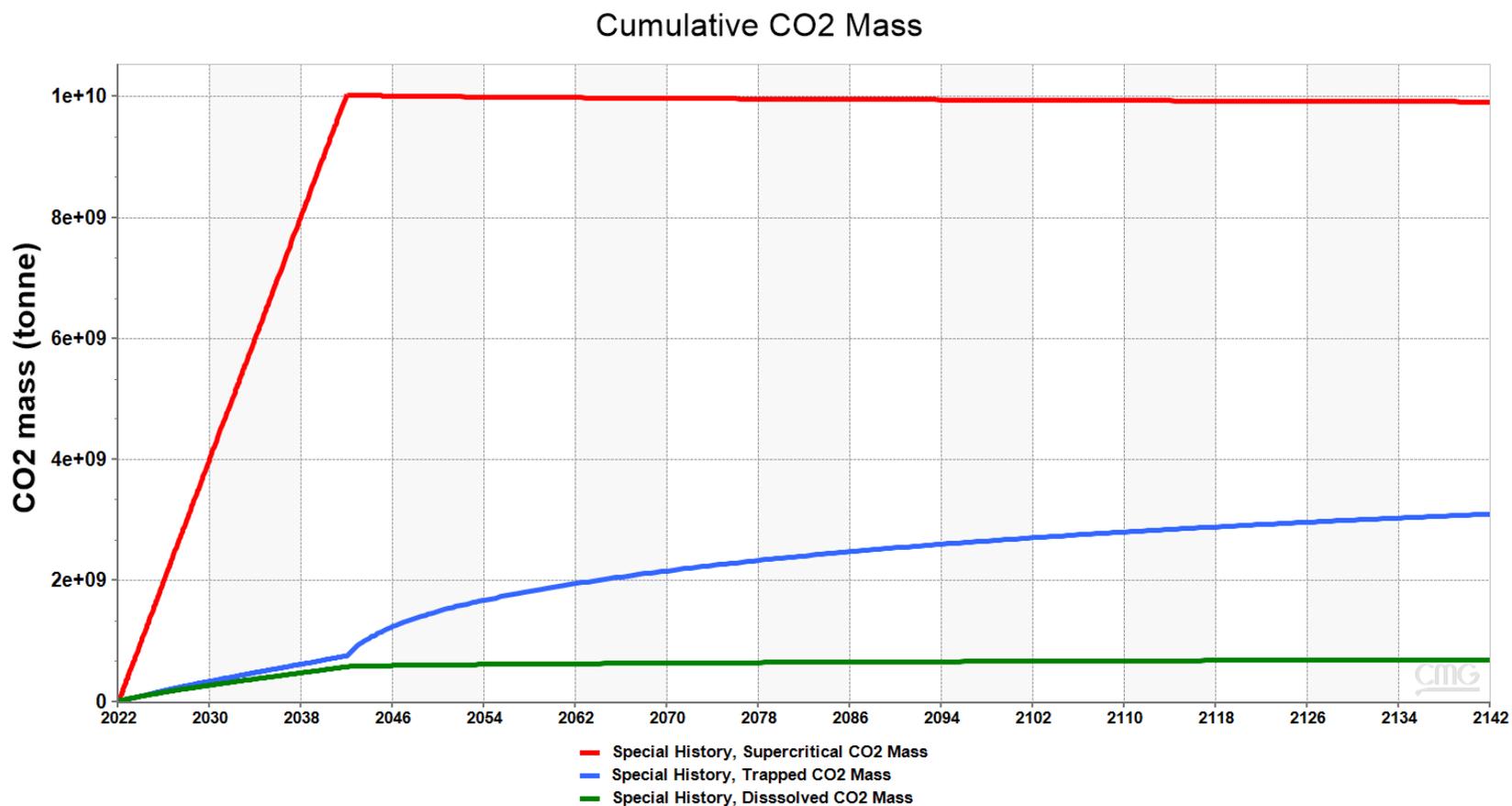


Figure A-15. Simulated total dissolved CO₂ in brine, supercritical-phase CO₂, and residually trapped CO₂.

19. Perform an injectivity test/step rate test.
20. Unset packer and circulate hole.
21. Set packer in the Black Island Formation to isolate the perforations.
22. Rig up acid trucks and equipment.
23. Perform cleaning of the perforations with acid (design volumes and pressures will be evaluated based on the well conditions once drilled). Adjust acid formulation and volumes with water samples and compatibility test.
24. Rig down acid trucks and equipment.
25. Perform an injectivity test/step rate test.
26. Unset packer and circulate hole.
27. Pull packer and work string out of the hole.
28. Rig up spooler and prepare rig floor to run upper completion.
29. Run completion assembly per program.
30. Circulate well with inhibited packer fluid.
31. Set packer 100 ft above the top perforations.
32. Install tubing sections, cable connector, and tubing hanger.
33. Rig up logging truck.
34. Run cased hole logs through tubing by program.
35. Rig down logging truck.
36. Nipple down BOP (blowout preventer).
37. Install injection tree.
Note: Figure 5-2 illustrates the proposed wellhead schematic
38. Rig down equipment.

Note: DTS/DAS (distributed temperature sensing/distributed acoustic sensing) fiber optic will be run and attached to the exterior of the intermediate casing. Special clamps, bands, and centralizers will be installed to protect the fiber and provide a marker for wireline operations.

Note: Tapered long string hanger should include top packer seal.

The McCall-1_Deadwood CO₂ Injection Well Proposed Tubing Design is detailed in the following section (Table 5-3).

Table 5-3. McCall-1_Deadwood CO₂ Injection Well Proposed Tubing Design

Description	Type, in.	Depths, ft	ID, in.	Burst, psi	Collapse, psi	Tension, Klb	OD Thread, in.
5.5" 20# L80 Coated Premium Conn	Tubing	0–7,250	4.778	9,190	8,830	466	6.05
4.5" 12.6# L80 Coated Premium Conn	Tubing	7,250–9,230	3.958	8,430	7,500	288	5.2
Packer 4.5" × 7"	50 ft above Perf.		Nickel-Plated, HNBR*				
4.5" 12.6# L80 13Cr Premium Conn	Tubing	9,230–9,400	3.958	8,430	7,500	288	5.2

* Hydrogenated nitrile butadiene rubber.

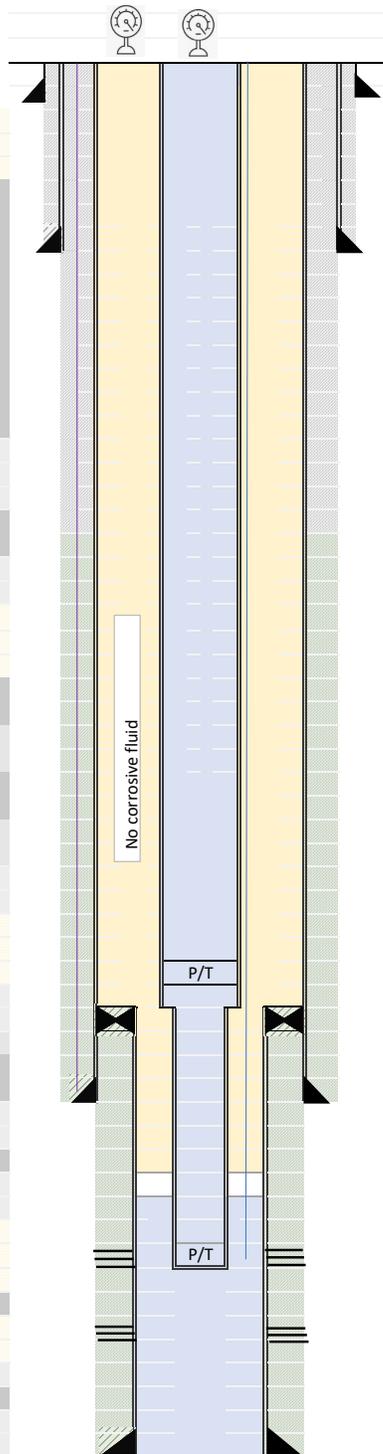
1. Packer depth will be adjusted with the final perforation depth interval.
2. Packer will be set 50 ft above top perforations.
3. Packer is required to be nickel-plated with HNBR elastomers.

McCall-1 (Deadwood Injector)

KB: 2022 ft / GL:1997 ft

Temp 90 F / Max Pressure 2800psi
Injection Rate 0.7-1.5 Mton/a

Fox Hills	980 ft
Pierre	1150 ft
Greenhorn	3012 ft
Mowry	3404 ft
Skull Creek	3458 ft
Inyan Kara	3686 ft
Swift	3865 ft
Rierdon	4324 ft
Piper-Kline	4484 ft
Piper-Picard	4594 ft
Opeche	4682 ft
Broom Creek	4740 ft
Amsden	4974 ft
Lodgepole	6265 ft
Dawson Bay	7596 ft
Interlake	7933 ft
Icebox	9170 ft
Black Island	9282 ft
Deadwood	9316 ft
Precambrian	9762 ft



Completion:

Tubing 5 1/2" 17# L80 coated , Premium Conn @ 7250 ft
X/O
Tubing 4 1/2" 12.6# L80 coated, Premium Conn @9230 ft
Packer 4 1/2" x 7" @ 9230 ft, Nickel Plated, HBNR elastomers
Tail Pipe 4 1/2" 12.6# L80 13 CR Premium Conn

(Packer will be set 100 ft from top perf based on log)
Inhibited Packer Fluid 10 ppg

Casing-deployed Fiber Optic Sensing System DTS-DAS Capable
Tubing-deployed Pressure&Temperature Gauges (2)

Figure 5-1. McCall-1 Deadwood injection well proposed completion wellbore schematic.

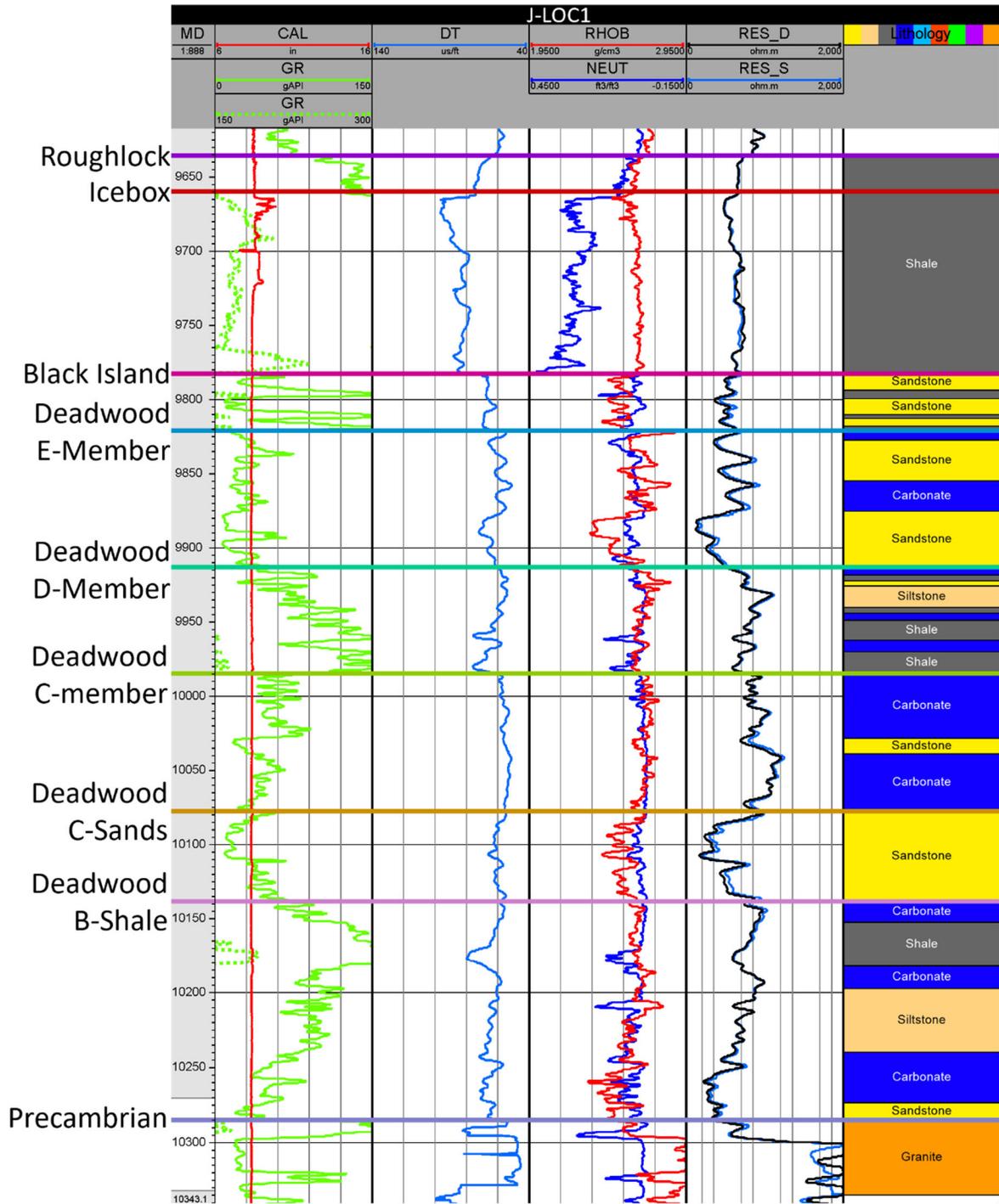


Figure 2-11. Well log display of the interpreted lithologies of the Roughlock, Icebox, Black Island, Deadwood, and Precambrian in **JLOC-1**.

Kadrmas, Bethany R.

From: Kadrmas, Bethany R.
Sent: Friday, November 12, 2021 4:04 PM
To: Bender, Lawrence
Cc: Entzi-Odden, Lyn
Subject: FW: Minnkota Power CO2

Lawrence,

Commission staff requests the following supplement materials. To the left, staff included the time stamp within the audio file for each request.

Broom Creek:

1:25:00 – Steve Fried/Richard Suggs – pg. 2-85, Identify lithology that triaxial test was done on in caption, and short explanation of why that lithology was used.
1:37:40 & 1:59:00 & 2:02:50 – Steve Fried – pgs. 2-19 and 2-20 – high resolution pdf – correct depths to subsea
1:56:20 – Richard Suggs – supplement regarding dissolution of anhydrite mass
2:07:00 – Richard Suggs – pg. 2-16 revised exhibit showing wells that moved the boundary
3:13:40 – 5 years of injection version of figure 3-1
3:15:20 Steve Fried/Richard Suggs – Supplement cathodic protection information – can note it is in review currently as testified, and will be supplemented when review is complete
3:17:00 – Steve Fried/Richard Suggs – pgs. 3-11/3-14 Revise with formations below the Broom Creek and discussion of the formations exposed with any impact they may see by injection activities
3:23:20 – Steve Fried – Supplement flowline material information, or note that it is in study as testified and will be supplemented when the study is complete
3:40:00 – Steve Fried - Submit FMI log to digitallogs@nd.gov – supplemental clarifying which logs were not able to be obtained and will be attempted on re-entry
3:49:40 – Steve Fried – pg. 4-78 - correct 4.7.1.1 to reflect that 2 million tons per year will be per well into the Broom Creek
4:01:40 – Steve Fried – Directional plan for unity 1
4:02:30 – Steve Fried – A-20 & A-21 - Address separate uppermost accumulation shown in A-A prime vs B-B prime. Different simulations, or other explanation?
4:07:09 – Steve Fried – Update risk-based leakage and pressure maps if necessary to address 4 million ton injection rate, per A-27 CO2 injection parameters
4:10:09 – Steve Fried – Supplement with current hypothetical rate of flow of Broom Creek into USDW pre injection
4:10:20 – Steve Fried – 5-year from start of injection incremental leakage map A-33
4:11:46 – Richard Suggs - Figure 3-5 – High resolution pdf with subsea correction
4:18:20 – Richard Suggs – Supplement explaining values of why specific values were selected for leaky wellbore parameters
4:30:00 – Richard Suggs – Supplement pressure over time as in figure 4-6 and figure 4-7, typo of 2 million tons per year on pg. 4-79
4:31:00 – Richard Suggs – Supplement discussing impact of co2 on Portland cement
4:36:50 – Bruce Hicks – pg. 3-4 – revised map with more easily identifiable legend and identifying what commercial wells are
4:56:59 – Steve Fried – Timing of drilling on site fox hills monitoring well

Deadwood:

5:05:30 – Steve Fried – pg. 4-11 Broom Creek and Deadwood - specific conductance, millisiemens used, should this be microsiemens?

5:30:00 – Steve Fried – Supplement information on hole stability and why MDT wasn't run
6:09:40 – Steve Fried – pg. 2-14 – Modify to show wells used to change areal extent
6:10:22 – Steve Fried – pg. 2-15 – Legible pdf
6:12:09 – Steve Fried – pg. 2-19 & 2-20 – High-res pdfs and correct to subsea
6:13:00 – Steve Fried – pg. 2-34 Provide rates and bottomhole pressure used for geochemical simulation
6:18:20 – Steve Fried – pg. 2-83 Values and show shift for pore pressure if any
6:20:00 – Steve Fried – pg. 3-6 – High-res pdf and corrected to subsea
6:20:30 – Steve Fried – pg. 3-7 – Correct to reflect Broom Creek application
6:20:50 – Steve Fried – pg. 3-4 – Include spring in legend and identify
6:21:15 – Steve Fried – pg. 3-9 through 3-14 – Show Black Island in tables and schematics
6:33:25 – Steve Fried – pg. 4-69 – Submit final reservoir formation pressure figure
6:42:32 – Richard Suggs – pg. 2-81 – Supplement showing where C-C prime is
6:43:45 – Richard Suggs – pg. 4-21 – Supplement depicting pressure front through time

Additionally, Commission staff requests Appendix H – Page 3 – 1.11 – Storage Reservoir definition be addressed. The Definition for the Deadwood has the definition from the Broom Creek. Please correct and address whether additional actions are or aren't required by the operator and/or the commission as a result of correcting the stratigraphic definition. Note any provisions in the geologic storage agreement allowing the change, or why such provisions aren't necessary.

Please let me know if you have questions.

Bethany Kadrmas

Legal Assistant, Oil and Gas Division

701.328.8020 • brkadrmas@nd.gov • www.dmr.nd.gov



600 E Boulevard Ave, Dept. 405 • Bismarck, ND 58505

From: Phillips, David R. <drphillips@nd.gov>
Sent: Thursday, November 4, 2021 3:43 PM
To: Bender, Lawrence <LBender@fredlaw.com>
Cc: Kadrmas, Bethany R. <brkadrmas@nd.gov>
Subject: RE: Minnkota Power CO2

Lawrence,

Thank you for checking on this issue before contacting Commission staff directly. In order to avoid ex parte communications, impropriety, or the appearance of impropriety, Bethany Kadrmas (copied on this email) has been designated as the sole point of contact in these cases. Bethany has no decision-making role in these cases and will not have a role in drafting the orders in these cases.

You, Shannon, and Wes have permission to communicate directly with Bethany. Any communications about the supplemental materials should be made only to Bethany in writing via email, and we will be including those emails in the case file. In the next few days, Bethany will be emailing you a list of supplemental materials that the Commission requests. Additionally, the audio of the hearing where supplemental materials were requested may be found at this link: [Retrieve NDIC Hearing Audio File](#)

David R. Phillips

Assistant Attorney General
500 North 9th Street
Bismarck, ND 58501-4509
Direct: (701) 328-4944
drphillips@nd.gov

From: Bender, Lawrence <LBender@fredlaw.com>
Sent: Thursday, November 4, 2021 1:02 PM
To: Phillips, David R. <drphillips@nd.gov>
Cc: Bender, Lawrence <LBender@fredlaw.com>
Subject: Minnkota Power CO2

******* CAUTION:** This email originated from an outside source. Do not click links or open attachments unless you know they are safe. *****

David:

Shannon has inquired about contacting Steven concerning some of the additional information that was requested by the NDIC staff at yesterday's hearing. I do not want to do anything that might cause a problem for you, the Commission staff or the Commission so I am emailing to get some guidance. Shannon was asking if she and Wes (an EERC employee) could contact Steven. Besides the exparte contact issue, I want to remind you that Shannon is a lawyer, and works as a lawyer for Minnkota Power, in addition to heading up this project.

Could you please give some thought on how Minnkota might proceed to discuss some issues concerning all the supplemental information the NDIC would like.

Please understand that with a November 16th deadline this is somewhat urgent.

STAFF BIOGRAPHIES | PRACTICE AREAS | CONTACT US



Lawrence Bender
Attorney

lbender@fredlaw.com

Main - 701-221-8700
Fax - 701-221-8750

Fredrikson & Byron, P.A.
1133 College Drive, Suite 1000
Bismarck, ND 58501

[Biography](#) | [Download My Contact Info as V-Card](#)
WWW.FREDLAW.COM

****This is a transmission from the law firm of Fredrikson & Byron, P.A. and may contain information which is privileged, confidential, and protected by the attorney-client or attorney work product privileges. If you are not the addressee, note that any disclosure, copying, distribution, or use of the contents of this message is prohibited. If you have received this transmission in error, please destroy it and notify us immediately at our telephone number (701) 221-8700.****

Minnkota Power Cooperative, Inc.

Case No. 29032

Application of Minnkota Power Cooperative, Inc. requesting consideration for the geologic storage of carbon dioxide from the Milton R. Young Station located in Sections 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 17, 18, 19, 20, 21, Township 141 North, Range 83 West, Sections 1, 2, 12, 13, Township 141 North, Range 84 West, Sections 19, 20, 21, 22, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, Township 142 North, Range 83 West, Sections 35, 36, Township 142 North, Range 84 West, Oliver County, North Dakota pursuant to North Dakota Administrative Code Section 43-05-01. View the draft storage facility permit, fact sheet, and storage facility permit application at www.dmr.nd.gov/oilgas/. Minnkota intends to capture carbon dioxide from the Milton R. Young Station and sequester it in the Deadwood Formation. The Commission will accept and consider written comments on the merits of the application and draft permit if received no later than 5:00 pm CDT November 1, 2021. Submit written comments to the Oil and Gas Division, 1016 East Calgary Avenue, Bismarck, North Dakota 58503-5512 or brkadrmas@nd.gov. Further draft permit information may be obtained from Steve Fried, and further hearing information may be obtained from Bethany Kadrmas, both at the North Dakota Oil and Gas Division, 1016 East Calgary Avenue, Bismarck, North Dakota 58503-5512, 701-328-8020. Minnkota Power Cooperative, Inc., 5301 32nd Avenue South, Grand Forks, ND 58201.

Case No. 29033

Application of Minnkota Power Cooperative, Inc. to consider the amalgamation of the storage reservoir pore space, in which the Commission may require that the pore space owned by nonconsenting owners be included in the geologic storage facility and subject to geologic storage, as required to operate the Minnkota Power Cooperative, Inc. storage facility located in Sections 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 17, 18, 19, 20, 21, Township 141 North, Range 83 West, Sections 1, 2, 12, 13, Township 141 North, Range 84 West, Sections 19, 20, 21, 22, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, Township 142 North, Range 83 West, Sections 35, 36, Township 142 North, Range 84 West, Oliver County, North Dakota, in the Deadwood Formation, pursuant to North Dakota Century Code Section 38-22-10.

Case No. 29034

Application of Minnkota Power Cooperative, Inc. for an order of the Commission determining the amount of financial responsibility for the geologic storage of carbon dioxide from the Milton R. Young Station in the storage facility located in Sections 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 17, 18, 19, 20, 21, Township 141 North, Range 83 West, Sections 1, 2, 12, 13, Township 141 North, Range 84 West, Sections 19, 20, 21, 22, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, Township 142 North, Range 83 West, Sections 35, 36, Township 142 North, Range 84 West, Oliver County, North Dakota, in the Deadwood Formation, pursuant to North Dakota Administrative Code Section 43-05-01-09.1.

November 2, 2021

INDUSTRIAL COMMISSION
STATE OF NORTH DAKOTA

Minnkota Power Cooperative, Inc.
Tundra – Deadwood Formation
Exhibit 1

DATE 11/2/21 ID 29032-34
Introduced by Minnkota
Exhibit 1
Identified By Minnkota

Minnkota Power Cooperative, Inc.

Deadwood Formation

November 2, 2021

DRAFT STORAGE FACILITY PERMIT

STORAGE FACILITY FOR CARBON SEQUESTRATION UNDER THE NORTH DAKOTA UNDERGROUND INJECTION CONTROL PROGRAM

In compliance with North Dakota Century Code Chapter (NDCC) 38-22 (Carbon Dioxide Underground Storage) and North Dakota Administrative Code (NDAC) Chapter 43-05-01 (Geologic Storage of Carbon Dioxide), Minnkota Power Cooperative, Inc. (Minnkota) has applied for a carbon dioxide storage facility permit. A draft permit does not grant the authorization to inject. This is a document prepared under NDAC 43-05-01-07.2 indicating the Commission's tentative decision to issue a storage facility permit. Before preparing the draft permit, the Commission has consulted with the Department of Environmental Quality and determined the storage facility permit application to be complete. The draft permit contains permit conditions required under NDAC 43-05-01-07.3 and 43-05-01-07.4. A fact sheet is included and contains the following information:

1. A brief description of the type of facility or activity which is the subject of the draft permit.
2. The quantity and quality of the carbon dioxide which is proposed to be injected and stored.
3. A brief summary of the basis for the draft permit conditions, including references to applicable statutory or regulatory provisions.
4. The reasons why any requested variances or alternatives to required standards do or do not appear justified.
5. A description of the procedures for reaching a final decision of the draft permit, including:
 - a. The beginning and ending dates of the comment period.
 - b. The address where comments will be received.
 - c. The date, time, and location of the storage facility permit hearing.
 - d. Any other procedures by which the public may participate in the final decision.
6. The name and telephone number of a person to contact for additional information.

This draft permit has been established on September 23, 2021 and shall remain in effect until a storage facility permit is granted under NDAC 43-05-01-05, unless amended or terminated by the Department of Mineral Resources (commission).

Stephen Fried, CCUS Supervisor
Department of Mineral Resources
Date: September 23, 2021

I. APPLICANT

Minnkota Power Cooperative, Inc.
5301 32nd Avenue South
Grand Forks, ND 58201

II. PERMIT CONDITIONS (NDAC 43-05-01-07.3)

1. The storage operator shall comply with all conditions of the permit. Any noncompliance with the permit constitutes a violation and is grounds for enforcement action, including permit termination, revocation, or modification pursuant to NDAC 43-05-01-12.
2. In an administrative action, it shall not be a defense that it would have been necessary for the storage operator to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit.
3. The storage operator shall take all reasonable steps to minimize or correct any adverse impact on the environment resulting from noncompliance with the storage facility permit.
4. The storage operator shall develop and implement an emergency and remedial response plan pursuant to section 43-05-01-13.
5. The storage operator shall at all times properly operate and maintain all storage facilities which are installed or used by the storage operator to achieve compliance with the conditions of the storage facility permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of backup or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of the storage facility permit.
6. The permit may be modified, revoked and reissued, or terminated pursuant to section 43-05-01-12. The filing of a request by the storage operator for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
7. The injection well permit or the permit to operate an injection well does not convey any property rights of any sort or any exclusive privilege.
8. The storage operator shall furnish to the commission, within a time specified by the commission, any information which the commission may request to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. The storage operator shall also

furnish to the commission, upon request, copies of records required to be kept by the storage facility permit.

9. The storage operator shall allow the commission, or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to:
 - a. Enter upon the storage facility premises where records must be kept under the conditions of the permit;
 - b. At reasonable times, have access to and copy any records that must be kept under the conditions of the permit;
 - c. At reasonable times, inspect any facilities, equipment, including monitoring and control equipment, practices, or operations regulated or required under the permit; and
 - d. At reasonable times, sample or monitor for the purposes of assuring permit compliance, any substances, or parameters at any location.
10. The storage operator shall prepare, maintain, and comply with a testing and monitoring plan pursuant to section 43-05-01-11.4.
11. The storage operator shall comply with the reporting requirements provided in section 43-05-01-18.
12. The storage operator must obtain an injection well permit under section 43-05-01-10 and injection wells must meet the construction and completion requirements in section 43-05-01-11.
13. The storage operator shall prepare, maintain, and comply with a plugging plan pursuant to section 43-05-01-11.5.
14. The storage operator shall establish mechanical integrity prior to commencing injection and maintain mechanical integrity pursuant to section 43-05-01-11.1.
15. The storage operator shall implement the worker safety plan pursuant to section 43-05-01-13.
16. The storage operator shall comply with leak detection and reporting requirements pursuant to section 43-05-01-14.
17. The storage operator shall conduct a corrosion monitoring and prevention program pursuant to section 43-05-01-15.
18. The storage operator shall prepare, maintain, and comply with the area of review and corrective action plan pursuant to section 43-05-01-05.1.

19. The storage operator shall maintain financial responsibility pursuant to section 43-05-01-09.1
20. The storage operator shall maintain and comply with post-injection site care and facility closure plan pursuant to section 43-05-01-19.

III. CASE SPECIFIC PERMIT CONDITIONS

1. NDAC 43-05-01-11.4, subsection 1, subdivision b; The operator shall notify the commission within 24 hours of failure or malfunction of surface or bottom hole gauge in the proposed McCall-1 injector, and the proposed NRDT-1 monitor well.
2. NDAC 43-05-01-11.4, subsection 1, subdivision c and NDAC 43-05-01-11, subsection 14; The operator shall run an ultrasonic or other log capable of evaluating internal and external pipe condition to establish a baseline for corrosion monitoring for the proposed McCall-1, and NRDT-1 wells. The operator shall run logs with the same capabilities for the McCall-1 on a 5 year schedule, unless analysis of corrosion coupons or subsequent logging necessitates a more frequent schedule.
3. NDAC 43-05-01-11.4; subsection 1, subdivision d and NDAC 43-05-01-13, subsection 2, The operator shall cease injection immediately, take all steps reasonably necessary to identify and characterize any release, implement the emergency and remedial response plan approved by the commission, and notify the commission within 24 hours of carbon dioxide detected above the confining zone.
4. NDAC 43-05-01-11.4, subsection 1, subdivision e and NDAC 43-05-01-11.1 subsections 3 and 5; External mechanical integrity shall be continuously monitored with the proposed fiber optic lines for the McCall-1 and NRDT-1. Due to the fiber optic line terminating above the Interlake Formation in the McCall-1 injector, an annual demonstration of external mechanical integrity is required. The commission must be notified within 24 hours should a fiber optic line fail. The commission must be notified prior to severing the line if such an action becomes necessary for remedial work or monitoring activities.
5. NDAC 43-05-01-11.4, subsection 1, subdivision h, paragraph 1; Surface air and soil gas monitoring is required to be implemented as planned by the operator in Section 4.1.4 (Surface Leak Detection and Monitoring Plan) of its permit.
6. NDAC 43-05-01-10, subsection 9, subdivision c, NDAC 43-05-01-11, subsection 15, and NDAC 43-05-01-11.1, subsection 2; The operator shall notify the commission at least 48 hours in advance to witness a mechanical integrity test of the tubing-casing annulus for the injection and monitoring wells. The packer must

be set within 100' of the upper most perforation and in the 13CR-80 casing. Dependent on evaluation, the operator shall run the same test on a 5 year schedule McCall-1 well.

7. NDAC 43-05-01-11, subsections 3 and 5; The operator shall continuously monitor the surface casing-production casing annulus with proposed fiber optic lines, and a gauge not to exceed 300 psi. The commission must be notified in advance if there is pressure that needs to be bled off.

Fact Sheet

1. Description of Facility

Minnkota's two-unit Milton R. Young Station is a mine-mouth lignite coal-fired power plant. Unit 1 and 2 have been in operation since November 1970 and May 1977, respectively. The lignite used as fuel for electrical generation is the source of carbon dioxide.

2. Quantity and Quality of Carbon Dioxide Stream

The Milton R. Young Station will capture 90% of its carbon dioxide emissions, amounting to an annual average of 4 million metric tons. The carbon dioxide is expected to be captured, dehydrated, compressed, and then injected. The projected composition of the carbon dioxide stream to be injected is at least 99% carbon dioxide with trace quantities of water (632 ppmv), nitrogen (163 ppmv), argon (4 ppmv), oxygen (6ppmv), sulfur dioxide (<1 ppmv), nitrogen dioxide (<1 ppmv), and nitric oxide (30 ppmv).

3. Summary of Basis of Draft Permit Conditions

The case specific permit conditions are unique to this storage facility, and not indicative of conditions for other storage facility permits. The conditions take into consideration the equipment proposed for this storage facility. Regulatory provisions for these conditions are all cited from NDAC Chapter 43-05-01 (Geologic Storage of Carbon Dioxide).

4. Reasons for Variances or Alternatives

No variances or alternatives.

5. Procedures Required for Final Decision

The beginning and ending dates of the comment period:
September 27, 2021 to 5:00 P.M. CDT November 1, 2021

The address where comments will be received:

Oil and Gas Division, 1016 East Calgary Avenue, Bismarck, North Dakota 58503-5512
or brkadrmas@nd.gov

Date, time, and location of the storage facility permit hearing:

November 2, 2021 9:00 A.M. CDT at 1000 East Calgary Avenue, Bismarck, North
Dakota 58503

Any other procedures by which the public may participate in the final decision:

At the hearing, the Commission will receive testimony and exhibits of interested parties.

6. Contact for Additional Information

Draft Permit Information: Stephen Fried – sfried@nd.gov – 701-328-8020

Hearing Information: Bethany Kadrmas – brkadrmas@nd.gov – 701-328-8020

TUNDRA SGS – CARBON DIOXIDE GEOLOGIC STORAGE FACILITY PERMIT

North Dakota CO₂ Storage Facility Permit Application – Corrected

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NOMENCLATURE

AES	atomic emission spectrometry
AMS	accelerator mass spectrometry
ANSI	American National Standards Institute
AOR	area of review
API	American Petroleum Institute
ASME	American Society of Mechanical Engineers
ASTM	ASTM (American Society for Testing and Materials) International
AVO	amplitude variation with offset
AZMI	above-zone monitoring interval
bbf	barrel
BHA	bottomhole assembly
BHP	bottomhole pressure
BHT	borehole temperature
BNI	BNI Coal, Inc.
BOP	blowout preventer
BOPE	blowout preventer equipment
bpm	barrels per minute
BTC	buttress-thread and coupled
CBL	cement bond log
CCP	corrosion control program
CCS	carbon capture and storage
CF	continuous flow
CFR	Code of Federal Regulations
cm	centimeter
CMG	Computer Modelling Group Ltd.
CMP	corrosion management program
CMR	combinable magnetic resonance
CO ₂	carbon dioxide
C-ODTR	coherent optical time domain reflectometry
COW	control of well
CRDS	cavity ring down spectrometry
CSE	confined space entry
CVAA	cold-vapor atomic absorption
DAS	distributed acoustic sensing
dB	decibel
DIC	dissolved inorganic carbon
DMR	Department of Mineral Resources
DO	dissolved oxygen
DOC	dissolved organic carbon
DOT	U.S. Department of Transportation

Continued . . .

NOMENCLATURE (continued)

DSS	distributed strain sensing
DTS	distributed temperature sensing
EERC	Energy & Environmental Research Center
EM	electromagnetic
EOR	enhanced oil recovery
EOS	equation of state
EPA	U.S. Environmental Protection Agency
ERR	emergency or remedial response
ERRP	emergency and remedial response plan
°F	degree Fahrenheit
FADP	financial assurance demonstration plan
FID	flame ionization detector
FMI	formation microimaging
FOSV	full opening safety valve
FPD	flame photometric detector
FS	field superintendent
ft	foot
GC	gas chromatography
g/cm ³	gram per cubic centimeter
GEM	Generalized Equation-of-State Model
GFCI	ground fault circuit interrupter
GPa	gigapascal
GPS	global positioning system
GR	gamma ray
h	hour
HCR	high closing ratio
HID	helium ionization detector
HNBR	hydrogenated nitrile butadiene rubber
HPMI	high-pressure mercury injection
HSE	health and safety and the environment
Hz	hertz
IARF	infinite-acting radial flow
HSE	health and safety and the environment
Hz	hertz
IARF	infinite-acting radial flow
HSE	health and safety and the environment
Hz	hertz
IARF	infinite-acting radial flow
IBOPSV	inside BOP safety valve
ICEA	Insulated Cable Engineers Association
ICP	inductively coupled plasma
ID	inside diameter

Continued ...

NOMENCLATURE (continued)

IEPA	Illinois Environmental Protection Agency
in.	inch
InSAR	interferometric synthetic aperture radar
IRMS	isotope-ratio mass spectrometry
JSA	job safety analysis
kg/m ³	kilogram per cubic meter
kHz	kilohertz
Klb	thousand pound
km	kilometer
L	liter
lb	pound
LCS	laboratory control sample
LEL	lower explosive limit
LOC	loss of containment
m	meter
mA	milliampere
m amsl	meter above mean sea level
MASP	maximum anticipated surface pressure
mD	millidarcy
MD	measured depth
MDT	modular dynamics testing
MEM	mechanical earth model
mg	milligram
mg/L	milligram per liter
mi	mile
mi ²	square mile
MI	move in
MICP	mercury injection capillary pressure
Minnkota	Minnkota Power Cooperative, Inc.
ML	local magnitude
mm	millimeter
MMI	modified Mercalli intensity
MMscf/d	million standard cubic foot per day
MMt	million tonne
MMt/yr	million tonne per year
MOC	management of change
mol%	mole percent
MPa	megapascal
MRV	monitoring, reporting, and verification
MRYS	Milton R. Young Station
m/s	meter per second
m/s ²	meter per square second

Continued . . .

NOMENCLATURE (continued)

ms	millisecond
MS	mass spectrometry
MVA	monitoring, verification, and accounting
MVTL	Minnesota Valley Testing Laboratories
NACE	National Institute of Corrosion Engineers
NAICS	North American Industry Classification System
NDAC	North Dakota Administrative Code
NDCC	North Dakota Century Code
NDDH	North Dakota Department of Health
NDIC	North Dakota Industrial Commission
NDSWC	North Dakota State Water Commission
NEC	National Electrical Code
NFPA	National Fire Protection Association
NIOSH	National Institute for Occupational Safety and Health
nm	nanometer
NMPA	Northern Municipal Power Agency
NU	nipple up
O ₂	oxygen
OD	outside diameter
OEM	original equipment manufacturer
O&G	oil and gas
OLCV	Oxy Low Carbon Ventures
ORP	oxidation reduction potential
OSHA	Occupational Safety and Health Administration
P&A	plug and abandon
PCOR	Plains CO ₂ Reduction (Partnership)
PISC	postinjection site care
PLT	production logging tool
PM	project manager
PNC	pulsed-neutron capture
PNL	pulsed-neutron log
PPE	personal protective equipment
ppf	pound per foot
ppg	pound per gallon
ppm	part per million
ppmv	part per million volume
psi	pound per square inch
P/T	pressure/temperature
QA	quality assurance
QASP	quality assurance and surveillance plan
QC	quality control
QCSP	quality control and surveillance plan
RTD	resistance temperature detector

Continued . . .

NOMENCLATURE (continued)

RTU	remote terminal unit
RU	rig up
RWP	rated working pressure
§	section
s	second
SCADA	supervisory control and data acquisition
SDS	safety data sheet
SFP	storage facility permit
SGS	secure geologic storage
SIMOPS	simultaneous operations
SLRA	screening-level risk assessment
SMEs	subject matter experts
SP	spontaneous potential
Spf	shots per foot
ST	surveillance technician
SWC	sidewall coring
T&A	temporarily plugged and abandoned
TCD	thermal conductivity detector
TD	total depth
TDS	total dissolved solids
TF	task force
TIC	total inorganic carbon
TIH	trip in hole
TOC	total organic carbon
Tundra SGS	Tundra Secure Geologic Storage Site
TVD	true vertical depth
UCS	uniaxial compressive strength
UIC	underground injection control
µL	microliter
USDW	underground source of drinking water
USGS	U.S. Geological Survey
USIT	ultrasonic imaging tool
VDL	variable density log
VFD	variable-frequency drive
VOA	volatile organic analysis
VSP	vertical seismic profile
WHP	wellhead pressure
WSP	worker safety plan
wt%	weight percent
XRD	x-ray diffraction
XRF	x-ray fluorescence

TUNDRA SGS – CARBON DIOXIDE GEOLOGIC STORAGE FACILITY PERMIT APPLICATION

PERMIT APPLICATION SUMMARY

General Applicant and Project Information. Minnkota Power Cooperative, Inc. (Minnkota) and its partners prepared this supporting documentation for its storage facility and underground injection control (UIC) Class VI permit applications to establish two storage reservoirs and phased construction and operation of up to three injection wells located in Oliver County, North Dakota. The project for secure geologic storage (SGS) of carbon dioxide (CO₂) will be operated over a 20-year injection period and be named Tundra SGS. Minnkota is the project sponsor of Tundra SGS. Minnkota anticipates contributing a portion of the total equity of the proposed storage project, but the other equity participants have not yet been identified. As such, the application names Minnkota as the sole storage facility operator and applicant. However, at a time prior to construction of the Tundra SGS site infrastructure, Minnkota anticipates contributing these permits to the Tundra SGS project entity. Minnkota intends such a contribution to effect a transfer of owner and operatorship to the Tundra SGS project entity. Further, a transfer of ownership is treated as a minor modification upon filing of an application to amend for change in ownership in accordance with North Dakota Administrative Code (NDAC) §§ 43-05-01-06 and 12.1. The current mailing address for the Tundra SGS facility and Minnkota, as the storage facility operator, is the following:

Minnkota Power Cooperative, Inc.
c/o Tundra SGS
5301 32nd Avenue South
Grand Forks, ND 58201

Minnkota is a regional generation and transmission cooperative headquartered in Grand Forks, North Dakota, providing wholesale power to 11 member-owner rural electric distribution cooperatives in eastern North Dakota and northwestern Minnesota. Minnkota is also affiliated with the Northern Municipal Power Agency (NMPA), which serves the electric needs of 12 municipalities in the same geographic region as the Minnkota member-owners. Minnkota serves as the operating agent of the NMPA. Figure PS-1 provides a map showing the Minnkota and NMPA service territory.

Minnkota's primary generating resource is the two-unit Milton R. Young Station (MRYS), a mine-mouth lignite coal-fired power plant. The mine which provides the lignite coal for MRYS is owned and operated by BNI Coal, Inc. (BNI) and is adjacent to the MRYS facility. The lignite used as the fuel for electrical generation also serves as the primary source of the captured CO₂ that will be securely stored by Tundra SGS. The operation of Tundra SGS together with the carbon capture project are commonly referred to as Project Tundra. The standard industrial classification code for the principal products and services provided Minnkota is best reflected as North American Industry Classification System (NAICS) 221112, Fossil Fuel Electric Power Generation.

An organizational chart showing the relationships between Minnkota and its affiliated organizations is provided in Figure PS-2.

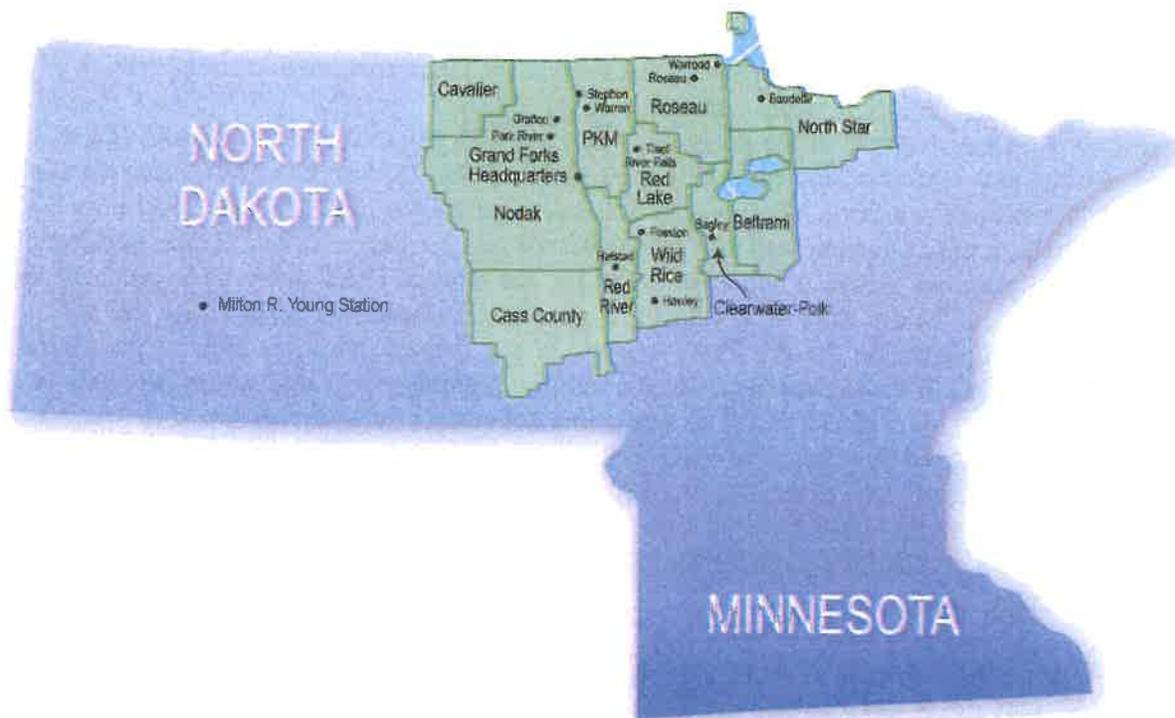


Figure PS-1. Map of the Minnkota and NMPA service territory.

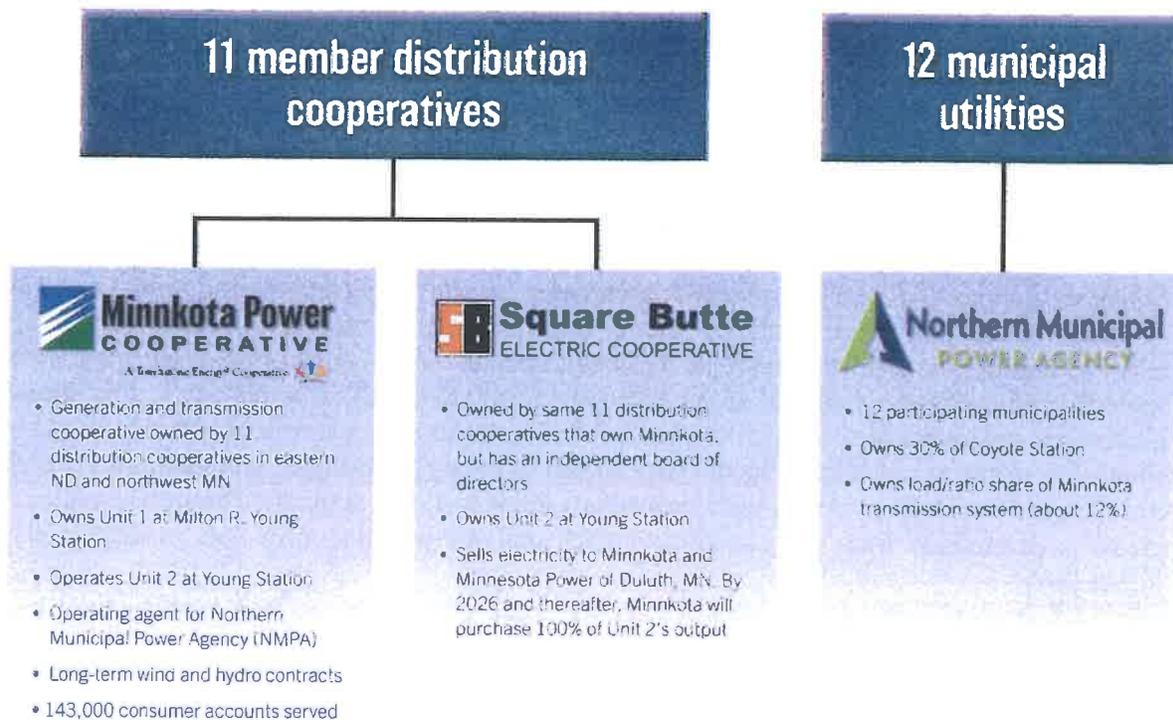


Figure PS-2. Chart showing the relationships between Minnkota and its affiliated organizations.

Minnkota proposes to initially conduct CO₂ storage operations in the Broom Creek Formation as Phase 1 of construction and operation of Tundra SGS. Two wells are proposed for Phase 1 injection of CO₂ into the Broom Creek Formation. Upon construction and operation of the two Broom Creek injection wells, validation of the Phase 1 operation and need for additional capacity will be considered in the decision to proceed with Phase 2 of development. Phase 2 of construction and operation may consist of one additional well for injection of CO₂ into the Black Island–Deadwood Formation. Alternatively, depending on the outcome of Phase 1 operation in the Broom Creek, a third injection well may be considered into the Broom Creek. Permit applications for the two proposed Phase 1 injection wells for the Broom Creek have been prepared and submitted. Since Tundra SGS is proposing a phased development approach for the site, the supporting documentation for the Phase 1 wells in the Broom Creek, as well as the Phase 2 injection well (one in the Black Island–Deadwood) is collectively provided within the application and attachments. This application and its supporting documents have been prepared in accordance with the North Dakota Century Code, and NDAC. The applications and supporting documentation are based on currently available data, including regional and site-specific data derived from two stratigraphic test wells drilled by Minnkota in 2020 and one stratigraphic test well drilled by the Energy & Environmental Research Center (EERC) in 2015, all located within 5 mi of the proposed injection wells.

The proposed Tundra SGS injection site is approximately 3.4 mi southwest of the town of Center (Figure PS-3) and will include up to three injection wells, one dedicated monitoring well for the lowest underground source of drinking water (USDW), and associated surface facility infrastructure that will accept CO₂ transported via a CO₂ flowline. In addition, one deep subsurface monitoring well is proposed to be installed approximately 2 mi northeast of the Tundra SGS injection site. All the aforementioned surface facilities and underground equipment will be contained on Minnkota-owned property, and the injection site is within the MRYS fence line (Figure PS-3).

Storage Reservoir Boundary/Area of Review. In establishing the definite boundaries of the storage facility area, Minnkota considered the characteristics and external factors influencing the operating life of the project, the opportunity for phased development of stacked storage facilities, and the coordinated operation of Broom Creek and Black Island–Deadwood storage facilities. Minnkota defines the storage reservoir boundaries as the projected vertical and horizontal migration of the CO₂ plume from the start of injection until the end of injection. The storage reservoir boundary is identified based on the computational model output of the areal extent of the subsurface CO₂ volume at the end of the injection period (20 years), in which a CO₂ saturation is predicted to be greater than or equal to 5%. To identify the storage reservoir boundaries, reservoir simulation software was used to model the coupled hydrologic, chemical, and thermal processes and chemical interactions of CO₂ with the aqueous fluids and rock minerals. The storage reservoir extent is determined from the numerical model, and the resulting map area is displayed in Figure PS-3.

The primary objective of the area of review (AOR) is to delineate the region encompassing the Tundra SGS site where USDWs may be endangered by the injection activity (NDAC § 43-05-01-01[4]). The AOR is generally defined as the horizontal extent of the combination of the CO₂ plume and the pressure front threshold caused by injection.

As shown in Figure PS-3, an AOR has been defined for each of the two targeted CO₂ storage horizons. These areas are used to identify the existence of any confining zone penetrations (i.e., existing wells that may penetrate the cap rock). There are five existing wellbores in the Black Island–Deadwood Formation AOR region. Three of those wellbores are the stratigraphic test holes drilled in the past 5 years as part of Tundra SGS geologic characterization efforts. Of these five existing wellbores, only three penetrated the cap rock of the Black Island–Deadwood Formation. Two of the wellbores that penetrate the Deadwood are two of the three stratigraphic test holes drilled for Tundra SGS characterization.

Of these existing wellbores, the remaining two do not penetrate the Black Island–Deadwood Formation. Within the Broom Creek Formation AOR, there are two existing wellbores, one of which is the same stratigraphic test well within the Black Island–Deadwood Formation AOR. This existing wellbore penetrates the Broom Creek Formation, and as discussed in Section 5.0, is proposed to be reentered and completed as one of the two Broom Creek Formation injectors, Liberty-1. Surface bodies of water and other pertinent surface features (including structures intended for human occupancy), administrative boundaries, and roads within the AOR are shown in Figure PS-3.

Minnkota also incorporated the AOR assessments into the proposed corrective action and monitoring plans. The deep subsurface-monitoring plan is tailored to each individual proposed AOR, while the near-surface-monitoring plan for the Broom Creek Formation extends to the boundary of the proposed Deadwood Formation AOR. The AOR assessments of these penetrating wells indicate that none could serve as conduits for the movement of fluids from the injection zone into USDWs. Therefore, no corrective actions on existing wells will need to be taken. Additionally, there are no subsurface cleanup sites, quarries, or Tribal lands within this area.

Construction and Operations Plan. The Tundra SGS project is designed to securely store the injected CO₂ within the storage reservoirs. At MRYS, the captured CO₂ stream will be at least 99% purity, dehydrated, and compressed to 1,800 psi before entering the CO₂ flowline. At these conditions, the CO₂ will be in a dense fluid phase, noncorrosive, and nonflammable. The approximately 0.25-mi (0.40-km) flowline will be 16 in. (40.64 cm) in outside diameter (OD) and have a maximum design flow rate of 4.3 MMT/yr (224 MMscf/d). Because of the short distance between the compressor and wellsite (0.25 mi), the CO₂ pressure is not anticipated to decrease significantly as the CO₂ travels the length of the flowline to the Tundra SGS site. The Broom Creek Formation injector wellhead pressure does not exceed 1,600 psi. Surface injection pressure into the Black Island–Deadwood storage zone will be increased to 2,800 psi using a booster pump downstream of the custody transfer metering station.

The Tundra SGS site design was optimized to receive CO₂ at an average operating rate of 4 MMT/yr, which represents an average annual capacity factor of 90% for the carbon capture plant. The operational design considers the need for redundancy for planned or unplanned outage of any

of the wells for maintenance or repair. Two wells are proposed for Phase 1 in the Broom Creek storage reservoir (to be named Liberty-1 and Unity-1) in a twin-well design. Liberty-1 will be a reentry into one of Minnkota's former stratigraphic test wells (J-ROC1, NDIC File No. 37672, now plugged and abandoned) and will be completed as a vertical injector. Unity-1, the twin well to Liberty-1, will be completed as a deviated injector with bottomhole location offset 1000 ft from Liberty-1. These two wells will be operated together to receive CO₂ at an annual average of 4.0 MMt/yr, with a maximum rate of 4.3 MMt/yr.

The optional Phase 2 of construction and operation contemplates a third injector as a vertical injector for the Black Island–Deadwood Formation and will be operated to receive CO₂ at a maximum rate of 1.3 MMT/yr. The phased approach to construction and the maximum rates of the three injector wells and associated equipment are based on operational flexibility, which includes consideration of the planned maintenance, outage, and operating capacity of MRYS and carbon capture equipment, along with the planned maintenance and testing requirements of the Tundra SGS site equipment.

The injection wells will be built with a protection system that will control the injection of the CO₂ and provide a means to safely stop CO₂ injection in the event of an injection well or equipment failure. The injection process will be monitored by an integrated system of equipment and instrumentation that will be capable of detecting whether injection conditions are out of permitted limits and responding by either adjusting conditions or ceasing injection. The system is designed to operate automatically with manual overrides. Additionally, Minnkota has prepared a detailed worker safety plan, which provides the minimum safety programs, permit activities, and training requirements to implement during the construction, operation, and postinjection site care activities of the Tundra SGS site.

Testing and Monitoring Plan. An extensive monitoring, verification, and accounting (MVA) system will be implemented to verify that injected CO₂ is effectively contained within the injection zone. The objectives of the MVA program are to proactively account for corrosion and leakage in the well equipment and surface facilities, track the lateral extent of CO₂ within the injection zones, characterize any geochemical or geomechanical changes that occur within the injection and confining zones that may affect containment, and track the areal extent of the injected CO₂ through indirect monitoring techniques such as geophysical and surveillance methods. The monitoring network, shown in Figure PS-3 and described in Section 4.0, will be designed to account for and verify the location of CO₂ injected.

Emergency and Remedial Response Plan (ERRP). Minnkota developed a comprehensive ERRP for the Tundra SGS site, delineating what actions would be necessary in the unlikely event of an emergency at the Tundra SGS site or within the AOR. The ERRP describes the potential affected resources and provides that site operators know which entities and individuals are to be notified and what actions need to be taken to expeditiously mitigate any emergency and protect human health and safety and the environment, including USDWs. An attachment to the ERRP identifies and categorizes potential adverse event scenarios, and if an adverse event occurred, a variety of emergency or remedial responses are outlined, to be deployed depending on the circumstances (e.g., the location, type, and volume of a release) to protect USDWs.

Postinjection Site Care and Site Closure Plan (PISC). Postinjection monitoring will include a combination of groundwater monitoring, storage zone pressure monitoring, and geophysical monitoring of the Tundra SGS site. The monitoring locations, methods, and schedule are designed to show the position of the CO₂ plume and demonstrate that the CO₂ injected is within the storage reservoir and there is no endangerment to the USDWs.

The proposed monitoring program includes one monitoring well, which covers each of the injection and above confining zones to verify that CO₂ has not migrated into that interval. In addition, a groundwater well will be completed at the Tundra SGS site in the Fox Hills Formation to monitor this lowermost federal USDW. Monitoring of the site will continue for a minimum of 10 years after injection has ceased.

Financial Responsibility Plan. Minnkota has developed a plan to maintain financial responsibility for the construction, operation, closure, and monitoring of the proposed injection wells and undertake any emergency or remedial actions that may be necessary. To ensure that sufficient funds will be available, Minnkota has obtained an estimate for the cost of hiring a third party to undertake any necessary actions to protect USDWs within the AOR. Funding for performing any needed corrective actions will be deposited in a Tundra SGS trust fund that will be available during all phases of the project. Minnkota will also obtain a third-party insurance policy that would be available for conducting any emergency or remedial response actions.

Summary. Minnkota prepared its storage facility and Class VI UIC permit applications and supporting documentation to demonstrate that 1) the proposed Tundra SGS site comprises injection zones of sufficient areal extent, thickness, porosity, and permeability to safely receive the planned injection volume and rates of CO₂ over 20 years and 2) the confining and secondary confining zones are free of transmissive faults and fractures and of sufficient areal extent and integrity to vertically contain the injected CO₂ at the proposed pressures and volumes without initiating or propagating fractures in the reservoir or confining zones. These findings are supported by the data and information gathered from coring, logging, sampling, and testing the subsurface characteristics in the three stratigraphic wells that provided site-specific geologic data as well as available regional data.

Minnkota has developed comprehensive construction and operations, testing and monitoring, injection well-plugging, and postinjection site care and site closure plans as well as an emergency and remedial response plan to protect USDWs. To ensure that sufficient funds are available to undertake these actions, Minnkota has also developed a financial responsibility plan.

Minnkota is confident that its permit applications and supporting documentation demonstrate compliance with the North Dakota Industrial Commission (NDIC) Underground Storage of Carbon Dioxide Rules and North Dakota Legislature's authorizing statute. Table PS-1 provides a crosswalk between the regulatory requirements in that rule and organization of Minnkota's supporting documentation.

Table PS-1. Crosswalk Between Applicable Regulatory Provisions in NDIC Rule and Tundra SGS Permit Application and Supporting Documents

NDIC Rule – Regulatory Requirements	Tundra SGS Permit Application
43-05-01-05. Storage Facility Permit Information	Sections 1.0, 2.0, 4.0, 5.0, and Appendixes A–C
43-05-01-05.1 Area of Review and Corrective Action	Sections 3.0, 4.2–4.3, and Appendixes A–B
43-05-01-13 Emergency Remedial Response	Section 4.2 and Appendix E
43-05-01-09 Well Permit Application Requirements	Sections 4.0, 5.0, and Form 25 (Northstar)
43-05-01-09.1 Financial Responsibility	Section 4.3 and Appendix G
43-05-01-11 Injection Well Construction and Completion Standards	Section 5.0
43-05-01-11.1 Mechanical Integrity	Sections 4.1 and 5.0
43-05-01-11.2 Logging, Sampling and Testing Prior to Injection Well Operation	Sections 2.1, 2.2, 5.0, and Appendix B
43-05-01-11.3 Injection Well Operating Requirements	Section 5.0
43-05-01-11.4 Testing and Monitoring Requirements	Section 4.1
43-05-01-11.5 Injection Well Plugging	Section 4.6
43-05-01-11.6 Injection Depth Waiver Requirements	<i>Not Applicable</i>
43-05-01-15 Storage Facility Corrosion Monitoring and Prevention Requirements	Section 4.1 and Appendix F
43-05-01-19 Post-Injection Site Care and Facility Closure Requirements	Section 4.7

1.0 PORE SPACE ACCESS

North Dakota law explicitly grants title of the pore space in all strata underlying the surface of lands and waters to the overlying surface estate, i.e., the surface owner owns the pore space (North Dakota Century Code [NDCC] Chapter 47-31 Subsurface Pore Space Policy). Prior to issuance of the storage facility permit (SFP), the storage operator is required by North Dakota statute for geologic storage of carbon dioxide (CO₂) to make a good faith attempt to obtain the consent of all persons who own pore space within the storage reservoir. The North Dakota Industrial Commission (NDIC) can amalgamate the nonconsenting owners' pore space into the storage reservoir if the operator can show that 1) after making a good faith attempt, it was able to obtain consent of persons who own at least 60% of the pore space in the storage reservoir and 2) NDIC finds that the nonconsenting owners will be equitably compensated for the use of the pore space. Amalgamation of pore space will be considered at an administrative hearing as part of the regulatory process required for consideration of the SFP application (NDCC §§ 38-22-06(3) and -06(4) and North Dakota Administrative Code [NDAC] §§ 43-05-01-08[1] and -08[2]). In connection herewith, Minnkota submits the form of storage agreement attached hereto as Appendix H which, upon final approval by NDIC, shall govern certain rights and obligations of the storage operator and the persons owning pore space within the amalgamated storage reservoir.

1.1 Storage Reservoir Pore Space

Minnkota Power Cooperative, Inc. (Minnkota) defines the proposed storage reservoir boundaries as the projected vertical and horizontal migration of the CO₂ plume from the start until the end of injection. The storage reservoir vertical and horizontal boundaries are identified based on the computational model output of the areal extent of the CO₂ plume volume at the end of the injection period (20 years), in which a CO₂ saturation is predicted to be greater than or equal to 5%. The model utilizes applicable geologic and reservoir engineering information and analysis as detailed in Section 2.0 and Appendix A.

The operation inputs for the simulation scenarios assumes storage at the average designed injection rates, approximately 4.0 MMT/year injected into the Broom Creek storage reservoir for the first 15 years of operation and 3.5MMt/year for year 15 through year 20 of operation. The operation input for the Black Island–Deadwood simulation scenario assumes storage at the maximum designed injection rate of approximately 1.17 MMT/year for 20 years. These maximum rates were based on Minnkota's consideration of the planned maintenance, outage, and operating capacity of the Milton R. Young Station (MRYS) and carbon capture equipment along with the planned maintenance requirements and testing requirements of the Tundra SGS (secure geologic storage) site equipment. During Phase 1 operation of the Broom Creek storage facility, Minnkota will conduct ongoing validation and assessment of need for construction and operation of the Black Island–Deadwood.

1.1.1 Horizontal Boundaries

The proposed horizontal boundaries of the storage reservoirs, including an adequate buffer area, are defined by the simulated migration of the CO₂ plume, using the actual rate of injection from the start until the end of injection. In establishing the definite boundaries of the storage facility area, Minnkota considered the characteristics and external factors influencing the operating life of the project, the opportunity for phased development of stacked storage facilities, and the coordinated operation of Broom Creek and Deadwood storage facilities if needed. The horizontal

storage reservoir boundary is proposed using a 20-year injection period and was benchmarked off the maximum design life of the carbon capture equipment. The reservoir models will be updated regularly with operating data and the operator will provide evidence of the CO₂ plume migration as part of the reevaluations required under NDAC §§ 43-05-01-05.1 and 43-05-01-11.4. These reevaluations are to occur no later than every 5 years, thus the simulation output at 5 years of operation is indicated in Figure 1-1 to exemplify the buffer existing within the proposed storage facility area, allowing safe operation as proposed and contemplated. The stacked storage operations scenario option allows for coordination of the capacity of the Black-Island Deadwood with the Broom Creek capacity and provides further assurance of the contemplated operation within the defined storage reservoir boundary.

The simulated horizontal storage reservoir boundary results proposed for the Deadwood Formation are depicted in Figure 1-1.

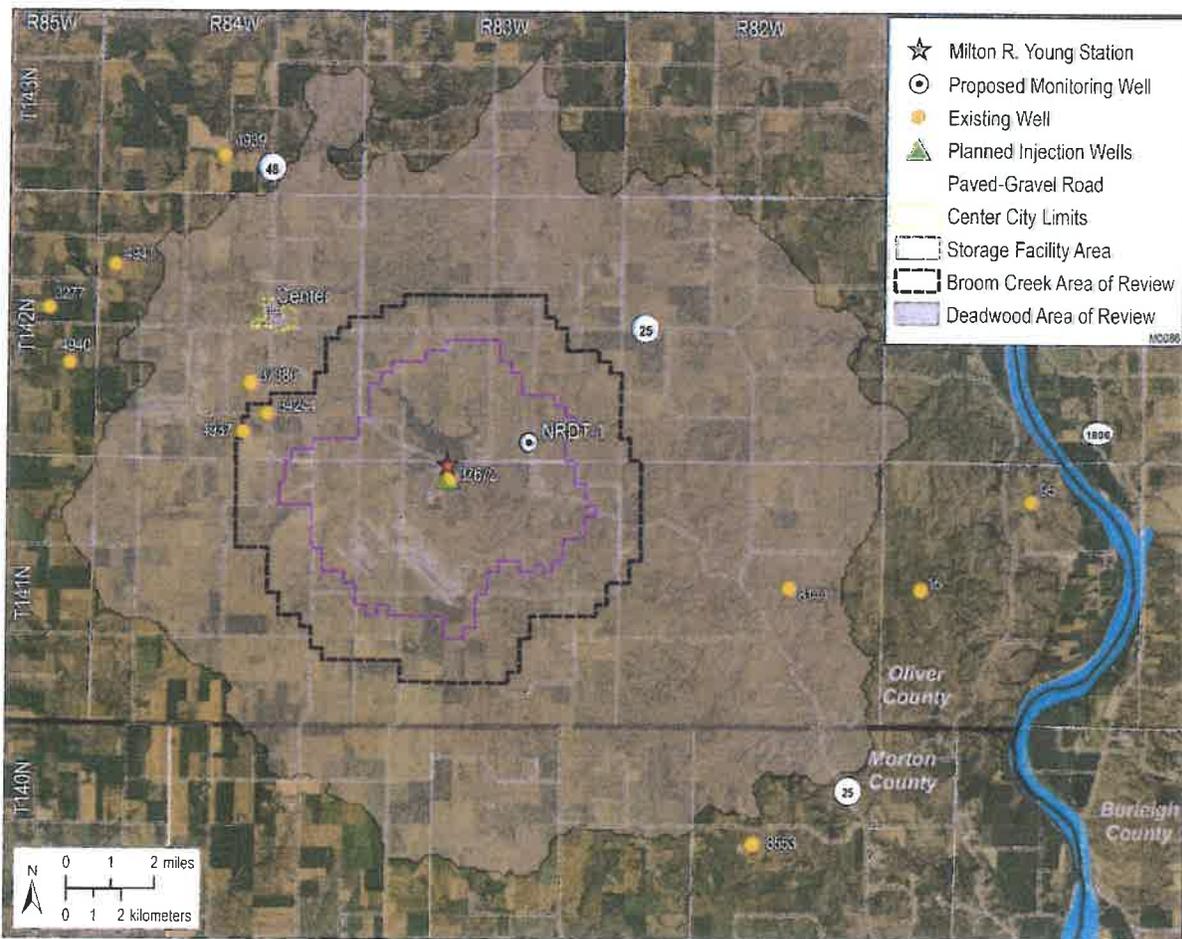


Figure 1-1. Deadwood storage facility area map.

1.1.2 Vertical Boundaries

The Tundra SGS site was designed using a stacked storage concept, where two storage reservoirs identified with varying vertical depths could be accessed by a common well site. A key benefit of this development approach is to minimize the surface land use impact by reducing the amount of surface facilities required for operation. Despite the significant overlap of pore space area between the Broom Creek and Deadwood reservoirs, two distinct SFPs are being requested, with the distinct vertical boundaries based upon geologic analysis and simulations which are further detailed and described in Section 2.0 of the respective SFP application supporting information.

The applicant requests amalgamation of the injection zone pore space within the Black Island, Deadwood E-member, and Deadwood C-member Sand intervals, as identified in Section 2.0, Figure 2-3. In addition to the injection zone, the applicant requests the permitted storage facility consist of the Icebox Formation as the upper confining zone and Deadwood B member shale as the lower confining zone (Section 2.0, Figure 2-3).

1.2 Persons Notified

Minnkota will identify the owners of record (surface and mineral), pore space and mineral lessees of record, and operators of mineral extraction activities within the facility area and within 0.5 mi of its outside boundary. Minnkota will notify in accordance with NDAC § 43-05-01-08 of the SFP hearing at least 45 days prior to the scheduled hearing. An affidavit of mailing will be provided to NDIC to certify that these notifications were made.

The identification of the owners, lessees, and operators that require notification was based on the following, recognizing that all surface owners also own the underlying pore space in accordance with North Dakota law (NDCC Chapter 47-31):

- A map showing the extent of the pore space that will be occupied by the CO₂ plume over the injection period, including the storage reservoir boundary and 0.5 mi (0.8 km) outside of the storage reservoir boundary with a description of the pore space ownership, surface owner, and pore space lessees of record (Figure 1-1).
- A table identifying all pore space (surface) owners, and lessees of pore space of record, their mailing addresses, and legal descriptions of their pore space landownership (Table 1-1).
- A table identifying each owner of record of minerals, mineral lessees and operators of record (Table 1-2).

Table 1-1. Surface Owners, Pore Space Owners and Lessees of Pore Space Requiring Hearing Notification

Surface Owners, Pore Space Owners and Lessees of Pore Space	Mailing Address	Legal Description
Minnkota Power Cooperative, Inc.	5301 32nd Avenue S., Grand Forks, ND 58201	Sec. 3-T141N-R83W Sec. 4-T141N-R83W Sec. 5-T141N-R83W Sec. 9-T141N-R83W Sec. 10-T141N-R83W Sec. 32-T142N-R83W Sec. 33-T142N-R83W Sec. 34-T142N-R83W
Square Butte Electric Cooperative	5301 32nd Avenue S., Grand Forks, ND 58201	Sec. 4-T141N-R83W Sec. 5-T141N-R83 Sec. 33-T142N-R83W
Oliver County Attn: County Auditor	Oliver County Courthouse, PO Box 188, Center, ND 58530	Sec. 5-T141N-R83W Sec. 34-T142N-R83W
BNI Coal, Ltd.	1637 Burnt Boat Drive, Bismarck, ND 58502-0897	Sec. 8-T141N-R83W Sec. 17-T141N-R83W Sec. 31-T142N-R83W Sec. 32-T142N-R83W
Five D's, LLP	3009 Bayside Drive, Mandan, ND 58554	Sec. 8-T141N-R83W
Janet K. Dohrmann and L. J. Dohrmann, Trustees of the Janet and L. J. Dohrmann Revocable Trust	9721 31st Street SW, Taylor, ND 58656	Sec. 7-T141N-R83W
Gary Leinius	204 Hager Avenue, Stanton ND 58571 AND 4958 Highway 200, Hazen ND 58545	Sec. 7-T141N-R83W Sec. 1-T141N-R84W
Delmar Hagerott	3170 27th Street, Center, ND 58530	Sec. 10-T141N-R83W Sec. 15-T141N-R83W Sec. 22-T141N-R83W
Delvin Bueligen	709A 3rd Ave. SE, Mandan, ND 58554	Sec. 10-T141N-R83W Sec. 15-T141N-R83W Sec. 22-T141N-R83W
Lowell Bueligen	13621 Homestead Lane, Riverton, UT 84065	Sec. 10-T141N-R83W Sec. 15-T141N-R83W Sec. 22-T141N-R83W
Rodella Hausauer	1611 Castillian Way, Mundelein, IL 60060	Sec. 10-T141N-R83W Sec. 15-T141N-R83W Sec. 22-T141N-R83W
James Orgaard	9589 Brentford Drive, Highlands Ranch, CO 80126	Sec. 10-T141N-R83W Sec. 15-T141N-R83W Sec. 22-T141N-R83W
Clifford Orgaard	11839 Forada Beach Road SE, Unit A, Alexandria, MN 56308	Sec. 10-T141N-R83W Sec. 15-T141N-R83W Sec. 22-T141N-R83W

Surface Owners, Pore Space Owners and Lessees of Pore Space	Mailing Address	Legal Description
Michael Orgaard	3010 27th Street, Center, ND 58530	Sec. 10-T141N-R83W Sec. 15-T141N-R83W Sec. 22-T141N-R83W
Steven Orgaard	2935 Manitoba Lane, Bismarck, ND 58501	Sec. 10-T141N-R83W Sec. 15-T141N-R83W Sec. 22-T141N-R83W
Arline Orgaard	2935 Manitoba Lane, Bismarck, ND 58501	Sec. 10-T141N-R83W Sec. 15-T141N-R83W Sec. 22-T141N-R83W
Larry F. & Virginia Schmidt, as joint tenants	2631 35th Avenue SW, Center, ND 58530	Sec. 16-T141N-R83W
Kasper J. Kraft & Donna M. Kraft	2845 35th Avenue SW, New Salem, ND 58563	Sec. 16-T141N-R83W
Kasper J. Kraft, Jr.	305 9th Street NW, Mandan, ND 58554	Sec. 16-T141N-R83W
Steve Kraft	2847 35th Avenue, New Salem, ND 58563	Sec. 16-T141N-R83W
Susan Henke	4235 20th Street SW, Stanton, ND 58571	Sec. 16-T141N-R83W
Allen Kraft	6155 12th Street SE, Bismarck, ND 58504	Sec. 16-T141N-R83W
Robin Schimke	9115 Paige Drive, Bismarck, ND 58503	Sec. 16-T141N-R83W
Oliver County	Oliver County Courthouse, 115 W Main, Center, ND 58530	Sec. 16-T141N-R83W
State of North Dakota - Dept. of Trust Lands Attn: Commissioner of University and School Lands	1707 N 9th Street, Bismarck, ND 58501	Sec. 16-T141N-R83W
Five D's LLP	4609 Borden Harbor Drive SE, Mandan, ND 58554	Sec. 17-T141N-R83W
Jerald O. Reuther	405 E Denver Avenue, Bismarck, ND 58503	Sec. 17-T141N-R83W
Wayne A. Reuther	4746 Glenwood Drive, Bismarck, ND 58504	Sec. 17-T141N-R83W Sec. 19-T141N-R83W
Karen L. Reuther	1411 Pocatello Drive, Bismarck, ND 58504	Sec. 17-T141N-R83W
Jeanette M. Reuther	P. O. Box 304, Center, ND 58530	Sec. 17-T141N-R83W
Larry F. Schmidt and Virginia Schmidt, as joint tenants	2631 35th Avenue SW, Center, ND 58530	Sec. 17-T141N-R83W
Brian Reinke	1106 East Highland Acres Road, Bismarck, ND 58501	Sec. 6-T141N-R83W
Benjamin Reinke	1215 Columbia Drive, Bismarck, ND 58504	Sec. 6-T141N-R83W
Elizabeth Wagendorf	948 Stryker Avenue, West St. Paul, MN 55118	Sec. 6-T141N-R83W
Jolene Berger	3004 Manchester Street, Bismarck, ND 58504	Sec. 6-T141N-R83W Sec. 1-T141N-R84W
Gary Leinius	204 Hager Avenue, Stanton ND 58571 AND 4958 Highway 200, Hazen ND 58545	Sec. 6-T141N-R83W
Heirs or Devisees of Alex Sorge, deceased	Center ND 58530	Sec. 32-T142N-R83W

Surface Owners, Pore Space Owners and Lessees of Pore Space	Mailing Address	Legal Description
Darlene Voegelé	P.O. Box 45, Stanton, ND 58571	Sec. 31-T142N-R83W Sec. 32-T142N-R83W
Oliver County Attn: Chairman	P.O. Box 188, Center, ND 58530	Sec. 4-T141N-R83W Sec. 32-T142N-R83W
ALLETE, INC.	30 W Superior St., Duluth, MN 55802-2030	Sec. 33-T142N-R83W
Bradley Ferderer, as trustee of the Thomas A. Ferderer Residuary Trust	Heil, ND 58546	Sec. 34-T142N-R83W
State of North Dakota	1707 N 9th St., Bismarck, ND 58501-5523	Sec. 34-T142N-R83W
Robert Reinke	1144 College Drive #201, Bismarck, ND 58501	Sec. 31-T142N-R83W
Loren Schwalbe	603 3rd Ave. NE, Mandan, ND 58554	Sec. 2-T141N-R83W
Carl Schwalbe	HC 2 Box 258, Center ND 58530	Sec. 2-T141N-R83W
Rolland Schwalbe	HC 2 Box 258, Center, ND 58530	Sec. 2-T141N-R83W
Loren Schwalbe	603 3rd Ave. NE, Mandan, ND 58554	Sec. 2-T141N-R83W
Alan Schwalbe	3175 27th Street, Center, ND 58530	Sec. 10-T141N-R83W Sec. 11-T141N-R83W
Julie Hatzenbihler	P.O. Box 325, Center, ND 58530	Sec. 11-T141N-R83W
Rodney J. Hatzenbihler	2660 30th Avenue, Center, ND 58530	Sec. 11-T141N-R83W
Nancy Henke	P.O. Box 90, Hazen, ND 58545	Sec. 11-T141N-R83W
Bonnie Schwab	3203 Mink Avenue, Gillette, WY 82716	Sec. 11-T141N-R83W
Peggy Gobar	504 Garden Avenue NW, West Fargo, ND 58078	Sec. 11-T141N-R83W
Annette Hatzenbihler	310 W Tonk, Gillette, WY 82718	Sec. 11-T141N-R83W
Brent Hatzenbihler	310 W Tonk, Gillette, WY 82718	Sec. 11-T141N-R83W
Randy Hatzenbihler	P. O. Box 325, Center, ND 58530	Sec. 11-T141N-R83W
Janet K. Dohrmann and L.J. Dohrmann, as Trustees of The Janet and L.J. Fast Revocable Trust	9721 31st Street SW, Taylor, ND 58656	Sec. 18-T141N-R83W
Wayne Reuther	4746 Glenwood Drive, Bismarck, ND 58504	Sec. 18-T141N-R83W
Kent Reutherfkuf	3610 27th St. SW, New Salem, ND 58563	Sec. 18-T141N-R83W Sec. 19-T141N-R83W
Keith Reuther	3594 27th St. SW, New Salem, ND 58563	Sec. 18-T141N-R83W Sec. 19-T141N-R83W
Karen Shulz	13720 Chamy Dr., Reno, NV 89521	Sec. 18-T141N-R83W Sec. 19-T141N-R83W
Jerald Reuther	405 E. Denver Avenue, Bismarck, ND 58503	Sec. 18-T141N-R83W Sec. 19-T141N-R83W
Martha Reuther	Martha Reuther Estate, c/o Jerald Reuther, 405 E Denver Avenue, Bismarck ND 58503 AND Martha Reuther Estate, c/o Jerald Reuther, New Salem ND 58563	Sec. 18-T141N-R83W
Larry F. Schmidt and Virginia Schmidt, as joint tenants	2631 35th Ave. SW, Center, ND, 58530	Sec. 18-T141N-R83W

Surface Owners, Pore Space Owners and Lessees of Pore Space	Mailing Address	Legal Description
Winfrid Keller	728 Custer Drive, Mandan, ND 58554	Sec. 19-T141N-R83W
Douglas A. Keller, Trustee of the Winfrid and Alice Keller Family Trust	913 Saint Thomas Trail, Mandan, ND 58554	Sec. 19-T141N-R83W
Charles H. Kuether	Route #1, Box 45, New Salem, ND 58563	Sec. 19-T141N-R83W
Charles H. Kuether	3555 28th Street, New Salem, ND 58563	Sec. 19-T141N-R83W
Erick G. Larson	50 Avalon Dr Unit 7323, Milford, CT 06460-8957	Sec. 19-T141N-R83W
Jack R. Hatzenbuhler and Helen Hatzenbuhler	3475 31st Street, Mandan, ND 58554	Sec. 22-T141N-R83W Sec. 27-T141N-R83W
Travis Klatt and Jessica Klatt, as joint tenants	2438 37th Ave. SW, Center, ND 58530	Sec. 1-T141N-R84W
Douglas D. Doll and Deberra K. Doll	3901 Faye Avenue N, Mandan, ND 58554	Sec. 20-T141N-R83W
Becky Jo Lemar	798 San Angelo Drive, Bismarck, ND 58503	Sec. 20-T141N-R83W
Wendy April Wittenberg	3032 Ontario Lane, Bismarck, ND 58503	Sec. 20-T141N-R83W
Danielle Kae Borseth	5025 Hitchcock Drive, Bismarck, ND 58503	Sec. 20-T141N-R83W
James D. Pazdernik and Bonita Pazdernik	3487 37th Avenue, New Salem, ND 58563	Sec. 20-T141N-R83W
Thomas Pazdernik	2582 Windsor Drive N, Mandan, ND 58554	Sec. 20-T141N-R83W
Matthew Pazdernik	2445 37th Street, Mandan, ND 58554	Sec. 20-T141N-R83W
Theresa Moravec	921 Mouton Avenue, Bismarck, ND 58505	Sec. 20-T141N-R83W
Michael Pazdernik	P. O. Box 194, New Salem, ND 58563	Sec. 20-T141N-R83W
Mark Pazdernik	22 3rd Street S, Carrington, ND 58421	Sec. 20-T141N-R83W
Dale P. Pfliger and Judy Pfliger	806 Tower Place, Mandan, ND 58554	Sec. 20-T141N-R83W
Mathias Pfliger	2508 10th Avenue SE, Mandan, ND 58554	Sec. 20-T141N-R83W
Aaron Pfliger	708 17th Street NW, Mandan, ND 58554	Sec. 20-T141N-R83W
Thomas Pfliger	806 Tower Place, Mandan, ND 58554	Sec. 20-T141N-R83W
Robert J. Mosbrucker	P. O. Box 745, Bothell, WA 98041	Sec. 20-T141N-R83W
Anton Pflieger and Helen Pflieger	105 Division Street NW, Mandan, ND 58554	Sec. 20-T141N-R83W
LouAnn Nider	824 Lohstreter Road, Mandan, ND 58554	Sec. 20-T141N-R83W
Carol Pflieger Anderson	734 Aspen Place, Bismarck, ND 58503	Sec. 20-T141N-R83W
Sandra Olhauser	1829 San Diego Drive, Bismarck, ND 5850	Sec. 20-T141N-R83W
Sherry Marentette	7417 Marble Ridge, Austin, TX 78747	Sec. 20-T141N-R83W
Kari Ann Pflieger Warner	411 6th Avenue NW, Mandan, ND 58554	Sec. 20-T141N-R83W
Doll Farm Enterprises	3997 36th Street, New Salem, ND 58563	Sec. 28-T141N-R83W
Dale P. Pfliger and Judy Pfliger	806 Tower Place, Mandan, ND 58554	Sec. 28-T141N-R83W
Mathias Pfliger	2508 10th Avenue SE, Mandan, ND 58554	Sec. 28-T141N-R83W
Aaron Pfliger	708 17th Street NW, Mandan, ND 58554	Sec. 28-T141N-R83W
Thomas Pfliger	806 Tower Place, Mandan, ND 58554	Sec. 28-T141N-R83W
Clementine Freisz	710 Pine Avenue, New Salem, ND 58563	Sec. 28-T141N-R83W
Sandra K. Orgaard	2810 26th Street, Center, ND 58530	Sec. 28-T141N-R83W
Roger A. Friesz	797 7th Street, Idaho Falls, ID 83401	Sec. 28-T141N-R83W

Surface Owners, Pore Space Owners and Lessees of Pore Space	Mailing Address	Legal Description
Duane M. Friesz	4465 34th Street, New Salem, ND 58563	Sec. 28-T141N-R83W
Karen M. Porsborg	2720 37th Avenue SW, New Salem, ND 58563	Sec. 28-T141N-R83W
Michael J. Friesz	3463 County Road 87, New Salem ND, 58563	Sec. 28-T141N-R83W
Audrey A. Peterson	12719 Doris Drive, Black Hawk, SD 57718	Sec. 28-T141N-R83W
Douglas D. Doll and Deberra K. Doll	3901 Faye Avenue N, Mandan, ND 58554	Sec. 21-T141N-R83W
Becky Jo Lemar	798 San Angelo Drive, Bismarck, ND 58503	Sec. 21-T141N-R83W
Wendy April Wittenberg	3032 Ontario Lane, Bismarck, ND 58503	Sec. 21-T141N-R83W
Danielle Kae Borseth	5025 Hitchcock Drive, Bismarck, ND 58503	Sec. 21-T141N-R83W
James D. Pazdernik and Bonita Pazdernik	3487 37th Avenue, New Salem, ND 58563	Sec. 21-T141N-R83W
Thomas Pazdernik	2582 Windsor Drive N, Mandan, ND 58554	Sec. 21-T141N-R83W
Matthew Pazdernik	2445 37th Street, Mandan, ND 58554	Sec. 21-T141N-R83W
Theresa Moravec	921 Mouton Avenue, Bismarck, ND 58505	Sec. 21-T141N-R83W
Michael Pazdernik	P.O. Box 194, New Salem, ND 58563	Sec. 21-T141N-R83W
Mark Pazdernik	22 3rd Street S, Carrington, ND 58421	Sec. 21-T141N-R83W
Anton Pflieger and Helen Pflieger	105 Division Street NW, Mandan, ND 58554	Sec. 21-T141N-R83W
LouAnn Nider	824 Lohstreter Road, Mandan, ND 58554	Sec. 21-T141N-R83W
Carol Pflieger Anderson	734 Aspen Place, Bismarck, ND 58503	Sec. 21-T141N-R83W
Sandra Olhauser	1829 San Diego Drive, Bismarck, ND 58504	Sec. 21-T141N-R83W
Sherry Marentette	7417 Marble Ridge, Austin, TX 78747	Sec. 21-T141N-R83W
Kari Ann Pflieger Warner	411 6th Avenue NW, Mandan, ND 58554	Sec. 21-T141N-R83W
Delmar Hagerott	3170 27th Street, Center, ND 58530	Sec. 21-T141N-R83W
Delvin Bueligen	709A 3rd Ave. SE, Mandan, ND 58554	Sec. 21-T141N-R83W
Lowell Bueligen	13621 Homestead Lane, Riverton, UT 84065	Sec. 21-T141N-R83W
Rodella Hausauer	1611 Castillian Way, Mundelein, IL 60060	Sec. 21-T141N-R83W
James Orgaard	9589 Brentford Drive, Highlands Ranch, CO 80126	Sec. 21-T141N-R83W
Clifford Orgaard	11839 Forada Beach Road SE; Unit A, Alexandria, MN 56308	Sec. 21-T141N-R83W
Michael Orgaard	3010 27th Street, Center, ND 58530	Sec. 21-T141N-R83W
Steven Orgaard	2935 Manitoba Lane, Bismarck, ND 58501	Sec. 21-T141N-R83W
Arline Orgaard	2935 Manitoba Lane, Bismarck, ND 58501	Sec. 21-T141N-R83W
City of Center Park District	Center, ND 58530	Sec. 2-T141N-R84W
Barry A. Berger and Carrie Berger, as joint tenants	809 Main Street E, Center, ND 58530	Sec. 2-T141N-R84W
Dwight Wrangham and Linda Wrangham, as joint tenants	301 52nd St. SE, Bismarck, ND 58501	Sec. 2-T141N-R84W
BNI Coal, Ltd.	1637 Burnt Boat Drive, P.O. Box 897, Bismarck, ND 58502-0897	Sec. 2-T141N-R84W

Surface Owners, Pore Space Owners and Lessees of Pore Space	Mailing Address	Legal Description
Eugene Yantzer and Betty Yantzer, as joint tenants	2745 18th St. SW, Center, ND 58530	Sec. 2-T141N-R84W
Delmar Hagerott Robert Edward Hagerott and Margaret Ruth Hagerott, Trustees, or their successors in trust under the Robert Edward Hagerott Revocable Trust, dated February 14, 1997	86 Warren Street, Needham, MA 2492	Sec. 29-T141N-R83W
Steven P. Kraft and Julie F. Kraft, as joint tenants	2847 35th Avenue, New Salem, ND 58563	Sec. 29-T141N-R83W
Delmar Hagerott	3170 27th Street, Center, ND 58530	Sec. 13-T141N-R83W
Annette Hatzenbihler	310 W Tonk, Gillette, WY 82718	Sec. 13-T141N-R83W
Nancy Henke and Dwight Henke	P.O. Box 90, Hazen, ND 58545	Sec. 13-T141N-R83W
Brent Hatzenbihler	310 W Tonk, Gillette, WY 82718	Sec. 13-T141N-R83W
Melissa Hatlestad	2372 Harmon Lane, Mandan, ND 58554	Sec. 13-T141N-R83W
Travis Henke	965 Gregory Lane, Mountain Home, ID 83647	Sec. 13-T141N-R83W
Rodney Hatzenbihler	2660 30th Avenue, Center, ND 58530	Sec. 13-T141N-R83W
Delvin Bueligen	709A 3rd Avenue SE, Mandan, ND 58554	Sec. 13-T141N-R83W
Lowell Bueligen	13621 Homestead Lane, Riverton, UT 84065	Sec. 13-T141N-R83W
Rodella Hausauer	1611 Castillian Way, Mundelein, IL 60060	Sec. 13-T141N-R83W
James Orgaard	9589 Brentford Drive, Highlands Ranch, CO 80126	Sec. 13-T141N-R83W
Clifford Orgaard	11839 Forada Beach Road SE, Unit A, Alexandria, MN 56308	Sec. 13-T141N-R83W
Michael Orgaard	3010 27th Street, Center, ND 58530	Sec. 13-T141N-R83W
Steven Orgaard	2935 Manitoba Lane, Bismarck, ND 58501	Sec. 13-T141N-R83W
Arline Orgaardz	2935 Manitoba Lane, Bismarck, ND 58501	Sec. 13-T141N-R83W
Mark Leischner and Susan Leischner	2866 Woodland Place, Bismarck, ND 58504-8922	Sec. 13-T141N-R83W
Mark Erhardt	P.O. Box 132, Center, ND 58530	Sec. 13-T141N-R83W
Burton & Etheleen Enterprises, LLC	3655 County Road 139, New Salem, ND 58563	Sec. 14-T141N-R84W
Lee Dresser	P.O. Box 683, Riverdale, ND 58565	Sec. 14-T141N-R84W
Jesse L. Lackman and Darcy J. Lackman Revocable Living Trust	2647 37th Avenue SW, Center, ND 58530	Sec. 14-T141N-R84W
David Porsborg and Karen Porsborg	2720 37th Avenue, New Salem, ND 58563	Sec. 24-T141N-R84W
Beverly Faul	1420 9th Avenue NE, McClusky, ND 58463	Sec. 24-T141N-R84W
Brad Bonnet	3444 110th Avenue NE, Bismarck, ND 58504	Sec. 24-T141N-R84W
Justin Kessler	6045 Lyndale Avenue S, #255, Minneapolis, MN 55419	Sec. 24-T141N-R84W

Surface Owners, Pore Space Owners and Lessees of Pore Space	Mailing Address	Legal Description
Adam Porsborg	2722 37th Avenue SW, New Salem, ND 58563	Sec. 24-T141N-R84W
Andrew Porsborg	2722 37th Avenue SW, New Salem, ND 58563	Sec. 24-T141N-R84W
Chad Porsborg	3206 Stonewall Drive, Bismarck, ND 58501	Sec. 24-T141N-R84W
Heather Bullinger	2602 10th Avenue SE, Mandan, ND 58554	Sec. 24-T141N-R84W
Christie Sorge	4412 E Mulberry, #312, Ft. Collins, CO 80524	Sec. 24-T141N-R84W
Tina Sorge	4412 E Mulberry, #312, Ft. Collins, CO, 80524	Sec. 24-T141N-R84W
Jerald Reuther	405 E Denver Avenue, Bismarck, ND 58503	Sec. 24-T141N-R84W
Wayne Reuther	476 Glenwood Drive, Bismarck, ND 58504	Sec. 24-T141N-R84W
Keith Reuther	3594 27th Street SW, New Salem, ND 58563	Sec. 24-T141N-R84W
Karen Shulz	13720 Chamy Drive, Reno, NV 89521	Sec. 24-T141N-R84W
Kent Reuther and Pam Reuther	3610 27th Street SW, New Salem, ND 58563	Sec. 24-T141N-R84W
Kenneth W. Reinke and Darlene Reinke	3841 25th Street SW, Center, ND 58530	Sec. 10-T141N-R84W
Minnkota Power Cooperative, Inc.	P.O. Box 13200, Grand Forks, ND 58208-3200	Sec. 3-T141N-R84W
Minnkota Power Cooperative, Inc.	1822 Mill Road, P.O. Box 3200, Grand Forks, ND 58208-3200	Sec. 3-T141N-R84W
Agnes Dockter	2424 South 121st Street, Seattle, WA 98101	Sec. 15-T142N-R83W
Steve Schmidt and Julie Schmidt, as joint tenants	P.O. Box 1936, Center, ND 58530	Sec. 15-T142N-R83W
Mike Saba a/k/a Michael P. Saba	26560 N. Shore Pl., Hartford, SD 57033	Sec. 15-T142N-R83W
State of North Dakota, for the use and benefit of the State Highway Department	608 East Boulevard Avenue, Bismarck, ND 58505-0700	Sec. 15-T142N-R83W
Larry Doll	3155 49th Avenue, New Salem, ND 58563	Sec. 23-T142N-R83W
Ann Doll	4601 McKenzie Drive SE, Mandan, ND 58554	Sec. 23-T142N-R83W
Larry Doll	3155 49th Avenue, New Salem, ND 58563	Sec. 23-T142N-R83W
State of North Dakota Board of University and School Lands	1707 N 9th Street, Bismarck, ND 58501	Sec. 36-T142N-R84W
Oliver County Attn: County Auditor	P.O. Box 188, Center, ND 58530-0188	Sec. 36-T142N-R84W
Minnkota Power Cooperative, Inc.	1822 State Mill Road, P. O. Box 13200", Grand Forks, ND 58208-3200	Sec. 36-T142N-R84W
BNI Coal, Ltd.	2360 35th Avenue SW, Center, ND 58530-9499	Sec. 36-T142N-R84W
BNI Coal, Ltd.	P.O. Box 897, Bismarck, ND 58502	Sec. 36-T142N-R84W
Larry J. Doll and Faye Doll	3155 49th Avenue, New Salem, ND 58563	Sec. 25-T142N-R83W

Surface Owners, Pore Space Owners and Lessees of Pore Space	Mailing Address	Legal Description
Haag Brothers, a partnership consisting of Thomas Haag, Donald Haag, and Conrad Haag	3051 Highway 25, Center, ND 58530	Sec. 24-T142N-R84W
Wayne Haag and Jennifer Haag, as joint tenants	P.O. Box 184, Center, ND 58530	Sec. 24-T142N-R84W
Kenneth J. Schmidt, Trustee of the Monica Schmidt Trust U/W DTD 1/18/2002	2205 36th Avenue SW, Center, ND 58530	Sec. 25-T142N-R84W
Kenneth Schmidt	2205 36th Avenue SW, Center, ND 58530	Sec. 25-T142N-R84W
Joseph Schmidt	3581 22 Street SW, Center, ND 58530	Sec. 19-T142N-R83W
Kenneth J. Schmidt, Trustee of the Monica Schmidt Trust U/W DTD 1/18/2002	2205 36th Avenue SW, Center, ND 58530	Sec. 19-T142N-R83W
Matthias A. Erhardt, trustee, or successor trustee(s), of the Matthias A. Erhardt Trust dated December 27, 1994	2121 35th Avenue SW, Center, ND 58530	Sec. 19-T142N-R83W
Josephine Erhardt, trustee, or successor trustee(s), of the Josephine Erhardt Trust dated December 27, 1994	2121 35th Avenue SW, Center, ND 58530	Sec. 19-T142N-R83W
Joey Nagel	RR1, Box 256, Center, ND 58530	Sec. 1-T141N-R83W
Jerry Nagel	RR1, Box 256, Center, ND 58530	Sec. 1-T141N-R83W
Richard A. Schwalbe and Lila M. Schwalbe, as joint tenants	HC 2, Box 254, Center, ND 58530	Sec. 1-T141N-R83W
Carl Schwalbe	HC 2 Box 258, Center, ND 58530	Sec. 1-T141N-R83W
Rolland Schwalbe	HC 2 Box 258, Center, ND 58530	Sec. 1-T141N-R83W
Loren Schwalbe	603 3rd Ave. NE, Mandan, ND 58554	Sec. 1-T141N-R83W
Richard A. Schwalbe and Lila M. Schwalbe, as joint tenants	HC 2, Box 254, Center, ND 58530	Sec. 12-T141N-R83W
Albert Schwalbe	502 3rd Ave. NW, Mandan, ND 58554	Sec. 12-T141N-R83W
Fred Schwalbe	Center, ND 58530	Sec. 12-T141N-R83W
Raynold Schwalbe	Center, ND 58530	Sec. 12-T141N-R83W
Walter Schwalbe	Center, ND 58530	Sec. 12-T141N-R83W
Julie Hatzenbihler	P.O. Box 325, Center, ND 58530	Sec. 12-T141N-R83W
Rodney J. Hatzenbihler	2660 30th Avenue, Center, ND 58530	Sec. 12-T141N-R83W
Nancy Henke and Dwight Henke, as joint life tenants	P.O. Box 90, Hazen, ND 58545	Sec. 12-T141N-R83W
Melissa Hatlestad	2372 Harmon Lane N, Mandan, ND 58554	Sec. 12-T141N-R83W

Surface Owners, Pore Space Owners and Lessees of Pore Space	Mailing Address	Legal Description
Travis Henke	965 Gregory Lane, Mountain Home, ID 83647	Sec. 12-T141N-R83W
Bonnie Schwab	3203 Mink Avenue, Gillette, WY 82716	Sec. 12-T141N-R83W
Peggy Gobar	504 Garden Ave. NW, West Fargo, ND 58078	Sec. 12-T141N-R83W
Annette Hatzenbihler	310 W. Tonk, Gillette, WY 82718	Sec. 12-T141N-R83W
Brent Hatzenbihler	310 W. Tonk, Gillette, WY 82718	Sec. 12-T141N-R83W
Randy Hatzenbihler	P.O. Box 325, Center, ND 58530	Sec. 12-T141N-R83W
Reda Renee Clinton and Stephanie A. Clarys, as joint tenants	3135 27th St. SW, Center, ND 58530	Sec. 14-T141N-R83W
Michael P. Hilton	3135 27th St. SW, Center, ND 58530	Sec. 14-T141N-R83W
Oliver County	Oliver County Courthouse, P.O. Box 188, Center, ND 58530	Sec. 14-T141N-R83W
John Barnhardt	1511 North 21st Street, Bismarck, ND 58501	Sec. 14-T141N-R83W
Gail M. Hilton	3195 27th St., Center, ND 58530	Sec. 14-T141N-R83W
Delmar Hagerott	3170 27th Street, Center, ND 58530	Sec. 14-T141N-R83W
Arline Orgaard	2935 Manitoba Lane, Bismarck, ND 58501	Sec. 14-T141N-R83W
Delvin Bueligen	709A 3rd Ave. SE, Mandan, ND 58554	Sec. 14-T141N-R83W
Lowell Bueligen	13621 Homestead Lane Riverton, UT 84065	Sec. 14-T141N-R83W
Rodella Hausauer	1611 Castillian Way, Mundelein, IL 60060	Sec. 14-T141N-R83W
James Orgaard	9589 Brentford Drive, Highlands Ranch, CO 80126	Sec. 14-T141N-R83W
Clifford Orgaard	11839 Forada Beach Road SE, Unit A, Alexandria, MN 56308	Sec. 14-T141N-R83W
Steven Orgaard	2935 Manitoba Lane, Bismarck, ND 58501	Sec. 14-T141N-R83W
Michael Orgaard	3010 27th Street, Center, ND 58530	Sec. 14-T141N-R83W
Dale Barnhardt	3199 27th Street, Center, ND 58530	Sec. 14-T141N-R83W
Alan Schwalbe	3175 27th St., Center, ND 58530	Sec. 14-T141N-R83W
Jeff Erhardt ad Mary Erhardt, as joint tenants	2161 34th Ave. SW, Center, ND 58530	Sec. 20-T142N-R83W
Yolanda Bittner	3428 Highway 25, Center, ND 58530	Sec. 20-T142N-R83W
Matthias A. Erhardt, as trustee of the Matthias A. Erhardt Trust dated December 27, 1994	2121 35th Ave. SW, Center, ND 58530	Sec. 20-T142N-R83W
Josephine Erhardt, as trustee of the Josephine Erhardt Trust dated December 27, 1994	2121 35th Ave. SW, Center, ND 58530	Sec. 20-T142N-R83W
State of North Dakota, N.D. Dept. of Trust Lands	1707 N 9th St, Bismarck, ND 58501-5523	Sec. 20-T142N-R83W
Raymond Friedig, as personal representative of the Estate of Magdalen F. Friedig, deceased	523 South Anderson Street, Bismarck, ND 58504	Sec. 26-T142N-R83W
Carl Schwalbe	Center, ND 58530	Sec. 26-T142N-R83W

Surface Owners, Pore Space Owners and Lessees of Pore Space	Mailing Address	Legal Description
Heirs or devisees of the Estate of Loren Schwalbe, deceased	3520 81st Ave. SE, Unit 15, Jamestown, ND 58401	Sec. 26-T142N-R83W
Rolland Schwalbe	Center, ND 58530	Sec. 26-T142N-R83W
Randolph Middleton and Mary Middleton, as joint tenants	2298 32nd Ave SW, Center, ND 58530	Sec. 26-T142N-R83W
Dale Barth	2255 33rd Ave. SW, Center, ND 58530	Sec. 27-T142N-R83W
Minnkota Power Cooperative, Inc.	5301 32nd Avenue S, Grand Forks, ND 58201-3312	Sec. 28-T142N-R83W
Minnkota Power Cooperative, Inc.	1822 Mill Road, P.O. Box 13200, Grand Forks, ND 58208-3200	Sec. 28-T142N-R83W
Bradley Ferderer, as trustee of the Thomas A. Ferderer Residuary Trust	Heil, ND 58546	Sec. 28-T142N-R83W
Dale Barth	2255 33rd Ave SW, Center, ND 58530	Sec. 28-T142N-R83W
Dusty Backer	PO Box 411, Underwood, ND 58576	Sec. 28-T142N-R83W
Minnkota Power Cooperative, Inc.	5301 32nd Avenue S, Grand Forks, ND 58201-3312	Sec. 29-T142N-R83W
Minnkota Power Cooperative, Inc.	1822 Mill Road, P.O. Box 13200, Grand Forks, ND 58208-3200	Sec. 29-T142N-R83W
Darlene Voegele	P.O. Box 45, Stanton, ND 58571	Sec. 29-T142N-R83W
Charles Kuether	3555 28th St., New Salem, ND 58563	Sec. 29-T142N-R83W
Doris Kuether	3555 28th St., New Salem, ND 58563	Sec. 29-T142N-R83W
Terrie Nehring	2234 35th Ave. SW, Center, ND, 58530	Sec. 29-T142N-R83W
Minnkota Power Cooperative, Inc.	5301 32nd Avenue S, Grand Forks, ND 58201-3312	Sec. 30-T142N-R83W
Minnkota Power Cooperative, Inc.	1822 Mill Road, P.O. Box 13200, Grand Forks, ND 58208-3200	Sec. 30-T142N-R83W
Ryan J. Weber	2241 29th Ave. SW, Center, ND 58530	Sec. 30-T142N-R83W
Darlene Voegele	P.O. Box 45, Stanton, ND 58571	Sec. 30-T142N-R83W
Bradley Dahl	602 Lehmkuhl St., PO Box 276, Center, ND 58530	Sec. 30-T142N-R83W
Brennan Price	3074 Highway 25, Center, ND 58530-1015	Sec. 35-T142N-R83W
State of North Dakota, N.D. Dept. of Trust Lands	1707 N 9th St, Bismarck, ND 58501-5523	Sec. 36-T142N-R83W
Michelle Marie Ternes	3721 W Regent Drive, Bismarck, ND 58504	Sec. 35-T142N-R84W
Michael P. Dresser	3731 24th Street SW, Center, ND 58530	Sec. 35-T142N-R84W
BNI Coal, Ltd.	P.O. Box 897, Bismarck, ND 58502	Sec. 35-T142N-R84W
Oliver County, Attn: County Auditor & Hwy Dept.	P.O. Box 188, Center, ND 58530-0188	Sec. 34-T142N-R84W
BNI Coal, Ltd	P.O. Box 879, Minot, ND 58702	Sec. 34-T142N-R84W
Dale Barth	2255 33rd Ave. SW, Center, ND 58530	Sec. 16-T142N-R83W
State of North Dakota	1707 N 9th Street, Bismarck, ND 58501	Sec. 16-T142N-R83W
Luella C. Isaak	3347 Hwy 25, Center, ND 58530	Sec. 16-T142N-R83W

Surface Owners, Pore Space Owners and Lessees of Pore Space	Mailing Address	Legal Description
Burton Isaak	3345 Hwy 25, Center, ND 58530	Sec. 16-T142N-R83W
Burton Lee Isaak, individually	3345 Hwy 25, Center, ND 58530	Sec. 16-T142N-R83W
Brenda Kitzan	3313 Hwy 25, Center, ND 58530	Sec. 16-T142N-R83W
Brent J. Isaak	2065 33rd Avenue SW, Center, ND 58530	Sec. 16-T142N-R83W
Luella C. Isaak	3345 Hwy 25, Center, ND 58530	Sec. 16-T142N-R83W
Brent Isaak	2065 33rd Avenue SW, Center, ND 58530	Sec. 16-T142N-R83W
Yolanda Bittner	3428 Highway 25, Center, ND 58530	Sec. 17-T142N-R83W
The State of North Dakota	1707 N 9th Street, Bismarck, ND 58501	Sec. 17-T142N-R83W
Jolene Berger	3004 Manchester Street, Bismarck, ND 58504	Sec. 12-T141N-R84W
Brian Dresser	2574 37th Avenue SW, Center, ND 58530	Sec. 12-T141N-R84W
Frances Fuchs	2475 37th Avenue NW, Center, ND 58530	Sec. 12-T141N-R84W
Rosalie A. Dingus	400 Augsburg Avenue, Bismarck, ND 58504	Sec. 12-T141N-R84W
Mark R. Fuchs	18671 Fairweather, Canyon Country, CA 91351	Sec. 12-T141N-R84W
Jack B. Fuchs	15409 Rhododendron Drive, Canyon Country, CA 91351	Sec. 12-T141N-R84W
Jeff Erhardt and Mary Erhardt, as joint tenants	2161 34th Ave. SW, Center, ND 58530	Sec. 21-T142N-R83W
Keith Erhardt	P.O. Box 1846, Center, ND 58530	Sec. 21-T142N-R83W
Keith Erhardt and Kelly Jo Erhardt, as joint tenants	P.O. Box 1846, Center, ND 58530	Sec. 21-T142N-R83W
Melvin Schoepp and Caroline Schoepp, as joint tenants	2023 Northridge Drive, Bismarck, ND 58503	Sec. 21-T142N-R83W
Larry Doll and Fay Doll, as joint tenants	3155 49th Ave., New Salem, ND 58563	Sec. 21-T142N-R83W
State of North Dakota	1707 N 9th St, Bismarck, ND, 58501-5523	Sec. 21-T142N-R83W
Lee Dresser	P. O. Box 683, Riverdale, ND 58565	Sec. 11-T141N-R84W
David O. Berger and Debra A. Berger, as joint tenants	2531 37th Avenue SW, Center, ND 58530	Sec. 11-T141N-R84W
Melvin Schoepp	3020 Daytona Drive, Bismarck, ND 58503	Sec. 22-T142N-R83W
Caroline K. Schoepp	3020 Daytona Drive, Bismarck, ND 58503	Sec. 22-T142N-R83W
Larry Doll and Fay Doll, as joint tenants	3155 49th Ave., New Salem, ND 58563	Sec. 22-T142N-R83W
Larry Doll	3155 49th Ave., New Salem, ND 58563	Sec. 22-T142N-R83W
Grealing Starck and Deborah Stark, as joint tenants	3244 Highway 25, Center, ND 58530	Sec. 22-T142N-R83W
Marie Mosbrucker	127 Klein Avenue, Center, ND 58530	Sec. 22-T142N-R83W
Raymond Friedig	523 South Anderson Street, Bismarck, ND 58504	Sec. 22-T142N-R83W
Duane Friedig	1706 East Bowman Avenue, Bismarck, ND 58504	Sec. 22-T142N-R83W
Shirley Hilzendeger	110 Klein Avenue, Center, ND 58530	Sec. 22-T142N-R83W

Surface Owners, Pore Space Owners and Lessees of Pore Space	Mailing Address	Legal Description
Ann Doll	4601 McKenzie Drive SE, Mandan, ND 58554	Sec. 22-T142N-R83W
State of North Dakota	1707 N 9th St, Bismarck, ND 58501-5523	Sec. 22-T142N-R83W

Table 1-2. Mineral Owners, Mineral Lessees and Operators Requiring Hearing Notification

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Minnkota Power Cooperative, Inc.	5301 32nd Avenue S, Grand Forks, ND 58201	Sec. 5-T141N-R83W
Square Butte Electric Cooperative	5301 32nd Avenue S, Grand Forks, ND 58201	Sec. 5-T141N-R83W
Great Northern Properties L.P.	1415 Louisiana Street, Suite 2400, Houston, TX 77002-7361	Sec. 5-T141N-R83W
Great Northern Properties L.P.	1658 Cole Boulevard, Building #6; Suite 2, Golden, CO 80401	Sec. 5-T141N-R83W
Great Northern Properties L.P.	1101 N 27th Street, Suite 201, Billings, MT, 59101	Sec. 5-T141N-R83W
Susanna Skubinna	Egeland ND 58331	Sec. 5-T141N-R83W
Mildred Meili Miran	21500 Miran Farm Lane, Aldie, VA 20105	Sec. 5-T141N-R83W
Marilyn Meili	7681 East Vista Drive, Scottsdale, AZ 85250-6824	Sec. 5-T141N-R83W
Douglas L. Franklin	4409 S 292nd Street, Auburn, WA 98002	Sec. 5-T141N-R83W
R. C. Newkirk	4208 Lone Oak Drive, Fort Worth, TX 76107	Sec. 5-T141N-R83W
Vernon R. Young	2954 Chevy Chase Drive, Houston, TX 77019Z	Sec. 5-T141N-R83W
Charles W. LaGrave and Louis G. Kravits, as joint tenants	118 Weiss Court, Hercules, CA 94547	Sec. 5-T141N-R83W
Richard Haddaway	109 Estates Drive, Santa Fe, NM 87506	Sec. 5-T141N-R83W
Percy Lee Henderson	3032 Willing Avenue, Fort Worth, TX 76110	Sec. 5-T141N-R83W
W. H. Henderson	1016 S Main Street, Fort Worth, TX 76104	Sec. 5-T141N-R83W
K. C. Kyle, Jr.	P. O. Box 253, Carthage, TX 75633	Sec. 5-T141N-R83W
Catherine Westbrook	12 North Park, Randolph AFB, TX 78148	Sec. 5-T141N-R83W
Joseph Harrison Shelton, Jr.	18629 Reamer Road, Castro Valley, CA 94546	Sec. 5-T141N-R83W
Katherine S. Fulcher	1120 N Golder, Odessa, TX 79761	Sec. 5-T141N-R83W
C. H. Kopp and Blanche Kopp, as joint tenants	1609 E Cypress, Enid, OK 73701	Sec. 5-T141N-R83W
Stanley T. Staggs and Cora Staggs, as joint tenants	2233 NW 31 St., Oklahoma City, OK 73112	Sec. 5-T141N-R83W
Wyman Orlin Meigs	2408 Zion Park, Yukon, OK 73099-5939	Sec. 5-T141N-R83W
Robert Michael Westfall	No address of record	Sec. 5-T141N-R83W
Don Walter Westfall	No address of record	Sec. 5-T141N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
First National Bank and Trust Company of Oklahoma City, Trustee under Agreement with Othel D. Westfall	c/o Boatmen's National Bank of Oklahoma, Bank of America, National Association (3510), Charlotte, NC, 100 North Tryon Street, Suite 170, Charlotte, NC 28202	Sec. 5-T141N-R83W
Charyl W. Loveridge and Margaret A. Loveridge, as joint tenants	701 Vandehei Avenue, Cheyenne, WY 82009-2553	Sec. 5-T141N-R83W
Dierdre A. (Reynolds) Shipman	6501 Deerview Trail, Durham, NC 27712	Sec. 5-T141N-R83W
John T. Reynolds	2835 Pond Apple, Schertz, TX 78154	Sec. 5-T141N-R83W
Mary L. (Reynolds) Hamlin	#9 Hickory Ridge, Texarkana, TX 75503	Sec. 5-T141N-R83W
Shauna I. (Reynolds) Lee	1127 Felicity Street, New Orleans, LA 70130	Sec. 5-T141N-R83W
Red Crown Royalties, LLC	1490 W Canal Court, Suite 3000, Littleton, CO 80120	Sec. 5-T141N-R83W
Red Crown Royalties, LLC	P. O. Box 888, Littleton, CO 80160-0888	Sec. 5-T141N-R83W
Tenneco Oil Company	P. O. Box 2511, Houston, TX 77252	Sec. 5-T141N-R83W
Tenneco Oil Company	1001 Louisiana, P. O. Box 2511, Houston, TX 77252-2511	Sec. 5-T141N-R83W
Frase-Tucker Resources, LLC	P. O. Box 994486, Redding, CA 96099	Sec. 5-T141N-R83W
Meridian Minerals Company	5613 DTC Parkway, Suite 1100, Englewood, CO 80111	Sec. 5-T141N-R83W
United States of America	Unknown address	Sec. 8-T141N-R83W
State of North Dakota - Dept. of Trust Lands	1707 N 9th Street, Bismarck, ND 58501	Sec. 8-T141N-R83W
Great River Energy Attn: Eric J. Olsen	12300 Elm Creek Boulevard N, Maple Grove, MN 55369-4718	Sec. 8-T141N-R83W
Minnkota Power Cooperative, Inc.	5301 32nd Avenue S, Grand Forks, ND 58201	Sec. 8-T141N-R83W
David Erhardt	13906 Round Oak Court. Houston, TX 77059	Sec. 8-T141N-R83W
Delphine Vetter	2317 79th Street SE, Linton, ND 58552	Sec. 8-T141N-R83W
Doretta Bornemann	511 County 27, Hazen, ND 58545	Sec. 8-T141N-R83W
Danita Deichert	3009 Bayside Drive, Mandan, ND 58554	Sec. 8-T141N-R83W
Dean P. Erhardt	120 Tennessee Walker Way, St. Peters, MO 63376	Sec. 8-T141N-R83W
Larry F. Schmidt and Virginia Schmidt, as joint tenants	2631 35th Avenue SW, Center, ND 58530	Sec. 8-T141N-R83W
Donna Barnhardt	8050 17th Avenue NE, Bismarck, ND 58501	Sec. 8-T141N-R83W
Linda Kilber	2928 Avenue B East, Bismarck, ND 58501	Sec. 8-T141N-R83W
Loretta Tabor	7100 Country Hills Drive, Bismarck, ND 58503	Sec. 8-T141N-R83W
John L. Kautzman	1314 22nd Street W, Williston, ND 58801-2139	Sec. 8-T141N-R83W
W. T. Brown	No street address of record, Newton, KS 67114	Sec. 8-T141N-R83W
Alexander Hamilton	2nd and Francis Streets, St. Joseph MO 64501	Sec. 8-T141N-R83W
Nick N. Kouloures	No address of record	Sec. 8-T141N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Clay E. Kedrick	306 Morningside Lane, Newton, KS, 67114	Sec. 8-T141N-R83W
Clay E. Kedrick	P. O. Box 205, Newton, KS, 67114	Sec. 8-T141N-R83W
Florence L. Hedrick	324 E 3rd Street, Newton, KS 67114	Sec. 8-T141N-R83W
O. Sutorius	No address of record	Sec. 8-T141N-R83W
Albert A. Goering	P. O. Box 366, Newton, KS, 67114	Sec. 8-T141N-R83W
Dean E. Stucky and O. Jean Stucky, as joint tenants	901 North Walnut, Medicine Lodge, KS 67104	Sec. 8-T141N-R83W
PEC Minerals LP	14860 Montfort Drive Suite 209, Dallas, TX, 75254	Sec. 8-T141N-R83W
Black Stone Minerals Company, L. P.	1001 Fannin, Suite 2020, Houston, TX, 77002-6709	Sec. 8-T141N-R83W
Walter Duncan, Inc.	100 Park Avenue, Suite 1200, Oklahoma City, OK 73102-8006	Sec. 8-T141N-R83W
J. C. Fore	303 S Okfuskee Avenue, Wewoka, OK 74884	Sec. 8-T141N-R83W
J. L. McMullen	127 N 4th St., Okemah, OK 74859-2456 AND 215 S 5th St., Okemah, OK 74859-3808	Sec. 8-T141N-R83W
Lily Stamper	No street address of record, Okemah, OK 74859	Sec. 8-T141N-R83W
George R. McKown	No street address of record, Okemah, OK 74859	Sec. 8-T141N-R83W
Mabel M. Johnson	P. O. Box 114, Wewoka, OK 74884	Sec. 8-T141N-R83W
Gerthel B. Fore	303 S Okfuskee Avenue, Wewoka, OK 74884	Sec. 8-T141N-R83W
O. C. Fore	303 S Okfuskee Avenue, Wewoka, ND 74884	Sec. 8-T141N-R83W
Carl Files	No street address of record, Okemah, OK 74859	Sec. 8-T141N-R83W
Ralph P. Kautzman	Center, ND 58530 AND 1408 Central Avenue, Mandan ND 58554	Sec. 8-T141N-R83W
Irene Kautzman	Center, ND 58530	Sec. 8-T141N-R83W
Breene Associates	P. O. Box 1773, Bismarck, ND 58501	Sec. 8-T141N-R83W
Breene Associates	1005 Ash Coulee Place, Bismarck, ND 58503	Sec. 8-T141N-R83W
Dallas Engineering, Inc.	P. O. Box 80707, Fairbanks, AK 99708	Sec. 8-T141N-R83W
Penelope Files	3387 W Silver Springs Boulevard, Lot 13, Ocala, FL 34475	Sec. 8-T141N-R83W
Carolyn K. Files	P. O. Box 154, Bunn, NC 27508	Sec. 8-T141N-R83W
Kurt Von Files	143 Lake Royale, Louisburg, NC 27549	Sec. 8-T141N-R83W
Erika Lee Files	HC5, Box 103-1, Gainesville, MO 65655	Sec. 8-T141N-R83W
Robert Carl Files	1720 1/2 Reed Avenue, San Diego, CA, 92109	Sec. 8-T141N-R83W
Richard Irwin Files	1720 1/2 Reed Avenue, San Diego, CA, 92109	Sec. 8-T141N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Janet K. Dohrmann and L. J. Dohrmann, Trustees of the Janet and L. J. Dohrmann Revocable Trust	9721 31st Street SW, Taylor, ND 58656	Sec. 7-T141N-R83W
Janet K. Dohrmann and Jamie A. Fast, Co-Trustees of the Opp Family Mineral Trust	9721 31st Street SW, Taylor, ND 58656	Sec. 7-T141N-R83W
Great Northern Properties LP	601 Jefferson Street; Suite 3600, Houston, TX 77002	Sec. 7-T141N-R83W
BNI Coal, Ltd.	1637 Burnt Boat Drive, Bismarck, ND 58502-0897	Sec. 7-T141N-R83W
State of North Dakota - Dept. of Trust Lands	1707 N 9th Street, Bismarck, ND 58501	Sec. 7-T141N-R83W
Meridian Minerals Company	5613 DTC Parkway, Suite 1100, Englewood, CO, 80111	Sec. 7-T141N-R83W
Meridian Minerals Company	2919 Allen Parkway, Houston, TX, 77019-2142	Sec. 7-T141N-R83W
Gary Leinius	204 Hager Avenue, Stanton ND 58571 AND 4958 Highway 200, Hazen ND 58545	Sec. 7-T141N-R83W
James Schneider	RR #1 Box 56, Center, ND 58530	Sec. 7-T141N-R83W
Gail Schneider	RR #1 Box 56, Center, ND 58530	Sec. 7-T141N-R83W
Ida Schwalbe Estate c/o Rolland Schwalbe	3160 25th Street, Center, ND 58530	Sec. 7-T141N-R83W
Wilma Lueneburg Estate c/o Linda Lueneburg	3730 Lockport St., Bismarck, ND 58503	Sec. 7-T141N-R83W
Alvin Hagerott	3190 27th Ave., Center, ND 58530	Sec. 7-T141N-R83W
Delmar Hagerott	3170 27th Street, Center, ND 58530	Sec. 15-T141N-R83W
Delvin Bueligen/Delvin Bueligen and Jill Bueligen, as joint tenant	709A 3rd Ave. SE, Mandan, ND 58554	Sec. 15-T141N-R83W
Lowell Bueligen/Lowell Bueligen and Tammy Bueligen, as joint tenants	13621 Homestead Lane, Riverton, UT 84065	Sec. 15-T141N-R83W
Rodella Hausauer/Rodella Hausauer and Barry Hausauer, as joint tenants	1611 Castillian Way, Mundelein, IL 60060	Sec. 15-T141N-R83W
James Orgaard	9589 Brentford Drive, Highlands Ranch, CO, 80126	Sec. 15-T141N-R83W
Clifford Orgaard	11839 Forada Beach Road SE; Unit A, Alexandria, MN 56308	Sec. 15-T141N-R83W
Michael Orgaard	3010 27th Street, Center, ND 58530	Sec. 15-T141N-R83W
Steven Orgaard	2935 Manitoba Lane, Bismarck, ND 58501	Sec. 15-T141N-R83W
Arline Orgaard	2935 Manitoba Lane, Bismarck, ND 58501	Sec. 15-T141N-R83W
Norlan Hagerott	744 Lake Avenue, Ortonville, MN 56278	Sec. 15-T141N-R83W
Albert Hagerott	3190 27th St, Center, ND 58530-9559	Sec. 15-T141N-R83W
Mary Hagerott	1719 N Bell St, Bismarck, ND 58501-1531	Sec. 15-T141N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Robert Edward Hagerott and Margaret Ruth Hagerott, Trustees, or their successors in trust, of the Robert Edward Hagerott Revocable Trust, dated February 14, 1997	86 Warren Street, Needham, MA 02492	Sec. 15-T141N-R83W
Edward C. Hagerott and Rosemary T. Hagerott, Trustees, or their successors in trust, under the Edward C. Hagerott and Rosemary T. Hagerott Living Trust dated April 29, 1999	136 West Bonita Avenue, Sierra Madre, CA 91024	Sec. 15-T141N-R83W
James Richard Keddy and Margaret R. Keddy, and successors, as Trustees of the Keddy Family Trust, dated January 14, 1994	16331 Serenade Lane, Huntington Beach, CA 82647	Sec. 15-T141N-R83W
Thomas Price	1211 Imperial Dr, Bismarck, ND 58504-7570 AND 115 Lakeview Dr, Watford City, ND 58854-7810 AND PO Box 96, Wolverton, MN 56594-0096 AND PO Box 631, Spencer, IN 47460-0631	Sec. 15-T141N-R83W
Dorothy L. Keck, Trustee of the Albert E. and Dorothy L. Keck Family Trust, dated July 21, 1989	1256 Cain Lane, Escondido, CA 92027	Sec. 15-T141N-R83W
Grace Ellen Janssen	Center, ND 58530	Sec. 15-T141N-R83W
State of North Dakota - Dept. of Trust Lands - Board of University & School Lands Attn: Commissioner of University and School Lands	1707 N 9th Street, Bismarck, ND 58501	Sec. 16-T141N-R83W
State of North Dakota - Board of University & School Lands Attn: Commissioner of University and School Lands	1707 N 9th Street, Bismarck, ND 58501	Sec. 17-T141N-R83W
BNI Coal, Ltd.	2360 35th Avenue SW, Center, ND 58530-9499	Sec. 17-T141N-R83W
Central Dakota Humane Society	2104 37th St., Mandan, ND 58554	Sec. 17-T141N-R83W
David Erhardt	13906 Round Oak Court, Houston, TX 77059	Sec. 17-T141N-R83W
Delphine Vetter	2317 79th Street SE, Linton, ND 58552	Sec. 17-T141N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Doretta Bornemann	511 County 27, Hazen, ND 58545	Sec. 17-T141N-R83W
Danita Deichert	3009 Bayside Drive, Mandan, ND 58554	Sec. 17-T141N-R83W
Dean P. Erhardt	120 Tennessee Walker Way, St. Peters, MO 63376	Sec. 17-T141N-R83W
Larry F. Schmidt and Virginia Schmidt, as joint tenants	2631 35th Avenue SW, Center, ND 58530	Sec. 17-T141N-R83W
Jerald O. Reuther	405 E Denver Avenue, Bismarck, ND 58503	Sec. 17-T141N-R83W
Wayne A. Reuther	4746 Glenwood Drive, Bismarck, ND 58504	Sec. 17-T141N-R83W
Karen L. Reuther	1411 Pocatello Drive, Bismarck, ND 58504	Sec. 17-T141N-R83W
Jeanette M. Reuther	P. O. Box 304, Center, ND 58530	Sec. 17-T141N-R83W
Donna Barnhardt	8050 17th Avenue NE, Bismarck, ND 58501	Sec. 17-T141N-R83W
Linda Kilber	2928 Avenue B East, Bismarck, ND 58501	Sec. 17-T141N-R83W
Loretta Tabor	7100 Country Hills Drive, Bismarck, ND 58503	Sec. 17-T141N-R83W
John L. Kautzman	1314 22nd Street W, Williston, ND 58801-2139	Sec. 17-T141N-R83W
W. T. Brown	No street address of record, Newton, KS 67114	Sec. 17-T141N-R83W
Alexander Hamilton	2nd and Francis Streets, St. Joseph MO 64501	Sec. 17-T141N-R83W
Nick N. Kouloures	No address of record	Sec. 17-T141N-R83W
Florence L. Hedrick	324 E 3rd Street, Newton, KS 67114	Sec. 17-T141N-R83W
O. Sutorius	No address of record	Sec. 17-T141N-R83W
Albert A. Goering	P. O. Box 366, Newton, KS 67114	Sec. 17-T141N-R83W
Dean E. Stucky and O. Jean Stucky, as joint tenants	901 North Walnut, Medicine Lodge, KS 67104	Sec. 17-T141N-R83W
PEC Minerals LP	14860 Montfort Drive, Suite 209, Dallas, TX 75254	Sec. 17-T141N-R83W
Black Stone Minerals Company, L. P.	1001 Fannin, Suite 2020, Houston, TX 77002-6709	Sec. 17-T141N-R83W
Walter Duncan, Inc.	100 Park Avenue, Suite 1200, Oklahoma City, OK 73102-6709	Sec. 17-T141N-R83W
J. C. Fore	303 S Okfuskee Avenue, Wewoka, OK 74884	Sec. 17-T141N-R83W
J. L. McMullen	127 N 4TH ST, Okemah OK 74859-2456 AND 215 S 5TH ST Okemah OK 74859-3808	Sec. 17-T141N-R83W
Lily Stamper	No street address of record, Okemah OK 74859	Sec. 17-T141N-R83W
George R. McKown	No street address of record, Okemah OK 74859	Sec. 17-T141N-R83W
Mabel M. Johnson	P. O. Box 114, Wewoka, OK 74884	Sec. 17-T141N-R83W
Gerthel B. Fore	303 S Okfuskee Avenue, Wewoka, OK 74884	Sec. 17-T141N-R83W
O. C. Fore	303 S Okfuskee Avenue, Wewoka, OK 74884	Sec. 17-T141N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Carl Files	No street address of record, Okemah, OK 74859	Sec. 17-T141N-R83W
Ralph P. Kautzman	Center, ND 58530 AND 1408 Central Avenue, Mandan ND 58554	Sec. 17-T141N-R83W
Irene Kautzman	Center, ND 58530	Sec. 17-T141N-R83W
Breene Associates	P. O. Box 1773, Bismarck, ND 58501	Sec. 17-T141N-R83W
Breene Associates	1005 Ash Coulee Place, Bismarck, ND 58503	Sec. 17-T141N-R83W
Dallas Engineering, Inc.	P. O. Box 80707, Fairbanks, AK 99708	Sec. 17-T141N-R83W
Penelope Files	3387 W Silver Springs Boulevard, Lot 13, Ocala, FL 34475	Sec. 17-T141N-R83W
Carolyn K. Files	P. O. Box 154, Bunn, NC 27508	Sec. 17-T141N-R83W
Kurt Von Files	143 Lake Royale, Louisburg, NC 27549	Sec. 17-T141N-R83W
Erika Lee Files	HC5, Box 103-1, Gainesville, MO 65655	Sec. 17-T141N-R83W
Robert Carl Files	1720 1/2 Reed Avenue, San Diego, CA 92109	Sec. 17-T141N-R83W
Richard Irwin Files	1720 1/2 Reed Avenue, San Diego, CA 92109	Sec. 17-T141N-R83W
James Schneider	RR #1, Box 56, Center, ND 58530	Sec. 6-T141N-R83W
Gail Schneider	RR #1, Box 56, Center, ND 58530	Sec. 6-T141N-R83W
Ida Schwalbe Estate c/o Rolland Schwalbe	3160 25th Street, Center, ND 58530	Sec. 6-T141N-R83W
Wilma Lueneburg Estate c/o Linda Lueneburg	3730 Lockport St., Bismarck, ND 58503	Sec. 6-T141N-R83W
Alvin Hagerott	3190 27th Ave., Center, ND 58530	Sec. 6-T141N-R83W
Gary Leinius	204 Hager Avenue, Stanton ND 58571 AND 4958 Highway 200, Hazen ND 58545	Sec. 6-T141N-R83W
State of North Dakota - Dept. of Trust Lands	1707 N 9th Street, Bismarck, ND 58501	Sec. 6-T141N-R83W
Brian Reinke	1106 East Highland Acres Road, Bismarck, ND 58501	Sec. 6-T141N-R83W
Benjamin Reinke	1215 Columbia Drive, Bismarck, ND 58504	Sec. 6-T141N-R83W
Elizabeth Wagendorf	948 Stryker Avenue, West St. Paul, MN 55118	Sec. 6-T141N-R83W
United States of America	Unknown address	Sec. 6-T141N-R83W
Red Crown Royalties, LLC	1490 W Canal Court, Suite 3000, Littleton, CO 80120	Sec. 6-T141N-R83W
Tenneco Oil Company	P. O. Box 2511, Houston, TX 77252	Sec. 6-T141N-R83W
Frase-Tucker Resources, LLC	P. O. Box 994486, Redding, CA 96099	Sec. 6-T141N-R83W
Minnkota Power Cooperative, Inc.	5301 32nd Avenue S, Grand Forks, ND 58201-3312	Sec. 6-T141N-R83W
Duane C. Anderson	1321 Whispering Hill, Ada, OK 74820	Sec. 9-T141N-R83W
Corrine L. Dockter	507 S 8th Street, Lot #10, Bismarck, ND 58504	Sec. 9-T141N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Vi Ann Olson	2130 27th Avenue S, Grand Forks, ND 58201	Sec. 9-T141N-R83W
Gary A. Anderson	110 Lakota Avenue, Center, ND 58530	Sec. 9-T141N-R83W
Willard C. Anderson	No address of record (Check with Duane, Corrine, Vi or Gary)	Sec. 9-T141N-R83W
Wallace R. Anderson	No address of record (Check with Duane, Corrine, Vi or Gary), Star Prairie, WI 54026	Sec. 9-T141N-R83W
Minnkota Power Cooperative, Inc.	5301 32nd Avenue S, Grand Forks, ND 58201-3312	Sec. 32-T142N-R83W
Heirs or devisees of Alex Sorge, deceased	Center ND 58530	Sec. 32-T142N-R83W
Darlene Voegele	P. O. Box 45, Stanton, ND 58571	Sec. 32-T142N-R83W
BNI Coal, Ltd. (f/k/a Baukol-Noonan, Inc.)	1637 Burnt Boat Drive, Bismarck, ND 58502	Sec. 32-T142N-R83W
Wayne Windhorst	P. O. Box 45, Stanton, ND 58571	Sec. 32-T142N-R83W
Spindletop Exploraton Company, Inc.	P. O. Box 50787, Midland, TX 79710-0787	Sec. 32-T142N-R83W
Estate of Elizabeth Meader, deceased	116 Dix Ave., Kingsbury, NY 12809	Sec. 32-T142N-R83W
Estate of Mildred Doyle, deceased	6 Tower Street, Red Hook, NY 12571	Sec. 32-T142N-R83W
Shirley A. Kilgour	6 Tower Street, Red Hook, NY 12571	Sec. 32-T142N-R83W
Denis A. Doyle	9 Spencer Drive, Red Hook, NY 12571	Sec. 32-T142N-R83W
United States of America	Unknown address	Sec. 32-T142N-R83W
Square Butte Electric Cooperative	5301 32nd Avenue S, Grand Forks, ND 58201-3312	Sec.4-T141N-R83W
Minnkota Power Cooperative, Inc.	5301 32nd Avenue S, Grand Forks, ND 58201-3312	Sec.4-T141N-R83W
Anna Manny	Center, ND 58530	Sec.4-T141N-R83W
United States of America	Unknown address	Sec.4-T141N-R83W
Square Butte Electric Cooperative	5301 32nd Avenue S, Grand Forks, ND 58201-3312	Sec. 33-T142N-R83W
Minnkota Power Cooperative, Inc.	5301 32nd Avenue S, Grand Forks, ND 58201-3312	Sec. 33-T142N-R83W
ALLETE, INC.	30 W Superior St., Duluth, MN 55802-2030	Sec. 33-T142N-R83W
Anna Manny	Center, ND 58530	Sec. 33-T142N-R83W
Pat Nassif	429 Sunset Place, Bismarck, ND 58504	Sec. 33-T142N-R83W
Fran Glasser	4735 Pintail Loop SE, Mandan, ND 58554	Sec. 33-T142N-R83W
Real S. A. K.	2207 East Main, Suite #2, Bismarck, ND 58501	Sec. 33-T142N-R83W
AgriBank, FCB (f/k/a The Federal Land Bank and Farm Credit Bank of Saint Paul)	375 Jackson Street, P.O. Box 64949, St. Paul, MN 55164-0949	Sec. 33-T142N-R83W
Floyd B. Sperry	No street address of record, Bismarck, ND 58501	Sec. 33-T142N-R83W
State of North Dakota N.D. Dept. of Trust Lands	1707 N 9th St, Bismarck, ND 58501-5523	Sec. 33-T142N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Great Northern Properties Limited Partnership Attn: Steven K. Shirley	1101 N. 27th Street, Suite 201, Billings, MT 59101	Sec. 33-T142N-R83W
Meridian Minerals Company	5613 DTC Parkway, Suite 1100, Englewood, CO 80111	Sec. 33-T142N-R83W
Minnkota Power Cooperative, Inc.	5301 32nd Avenue S, Grand Forks, ND 58201-3312	Sec. 34-T142N-R83W
Bradley Ferderer, as trustee of the Thomas A. Ferderer Residuary Trust	Heil, ND 58546	Sec. 34-T142N-R83W
Nick Ferderer	Flasher, ND 58535 AND 912 Summit Blvd, Bismarck ND 58504-5277	Sec. 34-T142N-R83W
Harry H. Ferderer	907 Cowl Street, Milton Freewater OR 97862-1682	Sec. 34-T142N-R83W
John R. Ferderer	115 C Street North, Richardton ND 58652	Sec. 34-T142N-R83W
Eleanor Falstad	Eleanor Falstad Estate, c/o Valerie Fast, 2495 15th St. NW, Coleharbor ND 58531-9449	Sec. 34-T142N-R83W
Joyce Ervin, as personal representative of the Estate of Marie M. McGirl, deceased	2073 Rayshire Street, Thousand Oaks CA 91362-2460	Sec. 34-T142N-R83W
Esther Ferderer, as personal representative of the Estate of Jake H. Ferderer, deceased	No address of record	Sec. 34-T142N-R83W
Dorene Rambur	500 North 17th Street, Bismarck ND 58501	Sec. 34-T142N-R83W
Norman D. Bunch	6900 Wedgewood Ct., Black Hawk, SD 57718-9680	Sec. 34-T142N-R83W
Kaspar Barth	Center ND 58530	Sec. 34-T142N-R83W
United States of America	Unknown address	Sec. 34-T142N-R83W
County of Oliver	Oliver County Courthouse, 115 W Main, Center, ND 58530	Sec. 34-T142N-R83W
Pat Nassif	429 Sunset Place, Bismarck, ND 58504	Sec. 34-T142N-R83W
Fran Glasser	4735 Pintail Loop SE, Mandan, ND 58554	Sec. 34-T142N-R83W
Real S. A. K.	2207 East Main, Suite #2, Bismarck, ND 58501	Sec. 34-T142N-R83W
Floyd B. Sperry	No street address of record, Bismarck, ND 58501	Sec. 34-T142N-R83W
AgriBank, FCB (f/k/a The Federal Land Bank and Farm Credit Bank of Saint Paul)	375 Jackson Street, P.O. Box 64949, St. Paul, MN 55164-0949	Sec. 34-T142N-R83W
Minnkota Power Cooperative, Inc.	5301 32nd Avenue S, Grand Forks, ND 58201-3312	Sec. 3-T141N-R83W
Alan Schwalbe	3175 27th St., Center, ND 58530	Sec. 3-T141N-R83W
Pat Nassif	429 Sunset Place, Bismarck, ND 58504	Sec. 3-T141N-R83W
Fran Glasser	4735 Pintail Loop SE, Mandan, ND 58554	Sec. 3-T141N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Real S. A. K.	2207 East Main, Suite #2, Bismarck, ND 58501	Sec. 3-T141N-R83W
Florian Emineth	No street address of record, Mandan, ND 58554	Sec. 3-T141N-R83W
Wm. M. Mutz	No street address of record, Mandan, ND 58554	Sec. 3-T141N-R83W
William K. Engelter	202 15th Street NW, Apt. 6, Mandan ND 58554-2075	Sec. 3-T141N-R83W
Great Northern Properties Limited Partnership Attn: Steven K. Shirley	1101 N. 27th Street, Suite 201, Billings, MT 59101	Sec. 3-T141N-R83W
Meridian Minerals Company	5613 DTC Parkway, Suite 1100, Englewood, CO 80111	Sec. 3-T141N-R83W
Duane C. Anderson	740 N. 23rd Street, Bismarck, ND 58501	Sec. 3-T141N-R83W
Corrine L. Dockter	740 N. 23rd Street, Bismarck, ND 58501	Sec. 3-T141N-R83W
Vi Ann Olson	740 N. 23rd Street, Bismarck, ND 58501	Sec. 3-T141N-R83W
Gary A. Anderson	740 N. 23rd Street, Bismarck, ND 58501	Sec. 3-T141N-R83W
Robert Reinke	1144 College Drive #201, Bismarck, ND 58501	Sec. 31-T142N-R83W
Darlene Voegele	P. O. Box 45, Stanton, ND 58571	Sec. 31-T142N-R83W
BNI Coal, Ltd. (f/k/a Baukol-Noonan, Inc.)	1637 Burnt Boat Drive, Bismarck, ND 58502	Sec. 31-T142N-R83W
Nellie Dietz	New Salem ND 58563	Sec. 31-T142N-R83W
Eldon Reinke	Eldon Reinke Estate, c/o Colleen Reinke, 13239 71st Street SE, Lisbon ND 58054	Sec. 31-T142N-R83W
Lyle Reinke	c/o Colleen Reinke, 13239 71st Street SE, Lisbon ND 58054	Sec. 31-T142N-R83W
Wayne Windhorst	P. O. Box 45, Stanton, ND 58571	Sec. 31-T142N-R83W
Spindletop Exploration Company, Inc.	P. O. Box 50787, Midland, TX 79710-0787	Sec. 31-T142N-R83W
Estate of Elizabeth Meader, deceased	116 Dix Ave., Kingsbury, NY 12809	Sec. 31-T142N-R83W
Estate of Mildred Doyle, deceased	6 Tower Street, Red Hook, NY 12571	Sec. 31-T142N-R83W
Shirley A. Kilgour	6 Tower Street, Red Hook, NY 12571	Sec. 31-T142N-R83W
Denis A. Doyle	9 Spencer Drive, Red Hook, NY 12571	Sec. 31-T142N-R83W
C. D. Griggs	230 Park Avenue, New York, NY 10169	Sec. 31-T142N-R83W
Lebert Lesch	Rt. 1, Box 134, Sheridan, WY 82801	Sec. 31-T142N-R83W
Lavern Heid	New Salem, ND 58563	Sec. 31-T142N-R83W
Carl Schwalbe	HC 2 Box 258, Center, ND 58530	Sec. 2-T141N-R83W
Rolland Schwalbe	HC 2 Box 258, Center, ND 58530	Sec. 2-T141N-R83W
Loren Schwalbe	603 3rd Ave. NE, Mandan, ND 58554	Sec. 2-T141N-R83W
State of North Dakota N.D. Dept. of Trust Lands	1707 N 9th St, Bismarck, ND 58501-5523	Sec. 2-T141N-R83W
United States of America	Unknown address	Sec. 2-T141N-R83W
Alan Schwalbe	3175 27th Street, Center, ND 58530	Sec. 10-T141N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Gertrude Schwalbe Estate c/o Susan Bohn, PR	16710 NE 41st Street, Redmond, WA 98052	Sec. 10-T141N-R83W
United States of America	Unknown address	Sec. 10-T141N-R83W
Duane C. Anderson	1321 Whispering Hill, Ada, OK 74820	Sec. 10-T141N-R83W
Corrine L. Dockter	624 S Hannifin Street; Apt. 3, Bismarck, ND 58504	Sec. 10-T141N-R83W
Vi Ann Olson	2130 27th Avenue S, Grand Forks, ND 58201	Sec. 10-T141N-R83W
Gary A. Anderson	315 Olier Avenue N, Center, ND 58530	Sec. 10-T141N-R83W
Delmar Hagerott	3170 27th Street, Center, ND 58530	Sec. 10-T141N-R83W
Delvin Bueligen/Delvin Bueligen and Jill Bueligen, as joint tenant	709A 3rd Ave. SE, Mandan, ND 58554	Sec. 10-T141N-R83W
Lowell Bueligen/Lowell Bueligen and Tammy Bueligen, as joint tenants	13621 Homestead Lane, Riverton, UT 84065	Sec. 10-T141N-R83W
Rodella Hausauer/Rodella Hausauer and Barry Hausauer, as joint tenants	1611 Castillian Way, Mundelein, IL 60060	Sec. 10-T141N-R83W
James Orgaard	9589 Brentford Drive, Highlands Ranch, CO 80126	Sec. 10-T141N-R83W
Clifford Orgaard	11839 Forada Beach Road SE, Unit A, Alexandria, MN 56308	Sec. 10-T141N-R83W
Michael Orgaard	3010 27th Street, Center, ND 58530	Sec. 10-T141N-R83W
Steven Orgaard	2935 Manitoba Lane, Bismarck, ND 58501	Sec. 10-T141N-R83W
Arline Orgaard	2935 Manitoba Lane, Bismarck, ND 58501	Sec. 10-T141N-R83W
Lynn C. Orgaard	2935 Manitoba Lane, Bismarck, ND 58501	Sec. 10-T141N-R83W
Norlan Hagerott	744 Lake Avenue, Ortonville, MN 56278	Sec. 10-T141N-R83W
Dollie Hagerot	744 Lake Avenue, Ortonville, MN 56278	Sec. 10-T141N-R83W
Albert Hagerott	3190 27th St, Center, ND 58530-9559	Sec. 10-T141N-R83W
Mary Hagerott	Mary Hagerott Estate, c/o Justin Hagerott, 3192 27th Street SW, Center ND 58530	Sec. 10-T141N-R83W
Robert Edward Hagerott and Margaret Ruth Hagerott, Trustees, or their successors in trust, of the Robert Edward Hagerott Revocable Trust, dated February 14, 1997	86 Warren Street, Needham, MA 02492	Sec. 10-T141N-R83W
Edward C. Hagerott and Rosemary T. Hagerott, Trustees, or their successors in trust, under the Edward C. Hagerott and Rosemary T. Hagerott Living Trust dated April 29, 1999	136 West Bonita Avenue, Sierra Madre, CA 91024	Sec. 10-T141N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
James Richard Keddy and Margaret R. Keddy, and successors, as Trustees of the Keddy Family Trust, dated January 14, 1994	16331 Serenade Lane, Huntington Beach, CA 92674	Sec. 10-T141N-R83W
Alvin Hagerott	HC2 Box 244, Center ND 58530	Sec. 10-T141N-R83W
Thomas Price	1211 Imperial Dr, Bismarck, ND 58504-7570 AND 115 Lakeview Dr, Watford City, ND 58854-7810 AND PO Box 96, Wolverton, MN 56594-0096 AND PO Box 631, Spencer, IN 47460-0631	Sec. 10-T141N-R83W
Dorothy L. Keck, Trustee of the Albert E. and Dorothy L. Keck Family Trust, dated July 21, 1989	1256 Cain Lane, Escondido, CA 92027	Sec. 10-T141N-R83W
Grace Ellen Janssen	Center, ND 58530	Sec. 10-T141N-R83W
AgriBank, FCB f/k/a The Federal Land Bank and Farm Credit Bank of Saint Paul	375 Jackson Street, P.O. Box 64949, St. Paul, MN 55164-0949	Sec. 10-T141N-R83W
Alan Schwalbe	3175 27th Street, Center, ND 58530	Sec. 11-T141N-R83W
Great Northern Properties L.P.	1415 Louisiana Street, Suite 2400, Houston, TX 77002-7361	Sec. 11-T141N-R83W
Meridian Minerals Company	5613 DTC Parkway, Suite 1100, Englewood, CO 80111	Sec. 11-T141N-R83W
State of North Dakota - Board of University and School Lands	1707 N 9th Street, Bismarck, ND 58501-5523	Sec. 11-T141N-R83W
Julie Hatzenbihler	P. O. Box 325, Center, ND 58530	Sec. 11-T141N-R83W
Rodney J. Hatzenbihler	2660 30th Avenue, Center, ND 58530	Sec. 11-T141N-R83W
Nancy Henke	P. O. Box 90, Hazen, ND 58545	Sec. 11-T141N-R83W
Bonnie Schwab	3203 Mink Avenue, Gillette, WY 82716	Sec. 11-T141N-R83W
Peggy Gobar	504 Garden Avenue NW, West Fargo, ND 58078	Sec. 11-T141N-R83W
Annette Hatzenbihler	310 W Tonk, Gillette, WY 82718	Sec. 11-T141N-R83W
Brent Hatzenbihler	310 W Tonk, Gillette, WY 82718	Sec. 11-T141N-R83W
Randy Hatzenbihler	P. O. Box 325, Center, ND 58530	Sec. 11-T141N-R83W
Janet K. Dohrmann and Jamie A. Fast, as Co-Trustees of The Opp Family Mineral Trust	9721 31st Street SW, Taylor, ND 58656	Sec. 18-T141N-R83W
State of North Dakota - Dept. of Trust Lands	1707 N 9th Street, Bismarck, ND 58501	Sec. 18-T141N-R83W
Wayne Reuther	4746 Glenwood Drive, Bismarck, ND 58504	Sec. 18-T141N-R83W
Kent Reuther	3610 27th St. SW, New Salem, ND 58563	Sec. 18-T141N-R83W
Keith Reuther	3594 27th St. SW, New Salem, ND 58563	Sec. 18-T141N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Karen Shulz	13720 Chamy Dr., Reno, NV 89521	Sec. 18-T141N-R83W
Jerald Reuther	405 E. Denver Avenue, Bismarck, ND 58503	Sec. 18-T141N-R83W
Martha Reuther	Martha Reuther Estate, c/o Jerald Reuther, 405 E Denver Avenue, Bismarck ND 58503 AND Martha Reuther Estate, c/o Jerald Reuther, New Salem ND 58563	Sec. 18-T141N-R83W
Larry F. Schmidt and Virginia Schmidt, as joint tenants	2631 35th Ave. SW Center ND 58530	Sec. 18-T141N-R83W
Peter Pflieger Jr.	No address of record	Sec. 18-T141N-R83W
Anton Pflieger and Helen Pflieger	105 Division Street NW, Mandan, ND 58554	Sec. 18-T141N-R83W
LouAnn Nider	824 Lohstreter Road, Mandan, ND 58554	Sec. 18-T141N-R83W
Carol Pflieger Anderson	734 Aspen Place, Bismarck, ND 58503	Sec. 18-T141N-R83W
Sandra Ohlhauser	1829 San Diego Drive, Bismarck, ND 58504	Sec. 18-T141N-R83W
Sherry Marentette	7417 Marble Ridge, Austin, TX 78747	Sec. 18-T141N-R83W
Kari Ann Pflieger Warner	411 6th Avenue NW, Mandan, ND 58554	Sec. 18-T141N-R83W
Marla Brown	28925 North Red Bloom Court, Wittmann, AZ 85361	Sec. 18-T141N-R83W
Holli K. Taylor	28827 N. 254th Lane, Wittmann, AZ 85361	Sec. 18-T141N-R83W
Myra Buntin	19425 Lower Territory Road, Prescott, AZ 86305	Sec. 18-T141N-R83W
Darrell Ray Buntin III	P.O. Box 167, Chino Valley, AZ 86323	Sec. 18-T141N-R83W
Amanda Marie Minick	4332 S. Fireside Trail, Gilbert, AZ 85297	Sec. 18-T141N-R83W
Lisa F. Pulse, as a purported heir to Angeline Bonogofsky, deceased	405 William Street, Miles City MT 59301- 2336	Sec. 18-T141N-R83W
Donald Perry Bonogofsky, as a purported heir to Angeline Bonogofsky, deceased	1117 Palmer Street, Miles City, MT 59301	Sec. 18-T141N-R83W
Gary Blase Bonogofsky, as a purported heir to Angeline Bonogofsky, deceased	1117 Palmer Street, Miles City, MT 59301	Sec. 18-T141N-R83W
Brittany E. Bonogofsky	1820 N. Merriam Street, Miles City, MT 59301	Sec. 18-T141N-R83W
Duane J. Siegel	C65 100 3rd Street SW, Mandan, ND 58554	Sec. 18-T141N-R83W
Susan Jones	33800 NE Kern Court, Scappoose, OR 97056	Sec. 18-T141N-R83W
Larry F. Schmidt and Virginia Schmidt, as joint tenants	2631 35th Avenue SW, Center, ND 58530	Sec. 18-T141N-R83W
Dallas Engineering, Inc.	P. O. Box 80707, Fairbanks, AK 99708	Sec. 18-T141N-R83W
Breene Associates	P. O. Box 1773, Bismarck, ND 58501	Sec. 18-T141N-R83W
Carolyn Files	P.O. Box 154, Bunn, NC 27508	Sec. 18-T141N-R83W
Robert Files	1720-1/2 Reed Avenue, San Diego, CA 92109	Sec. 18-T141N-R83W
Richard Files	1720-1/2 Reed Avenue, San Diego, CA 92109	Sec. 18-T141N-R83W
Kurt Files	143 Lake Royale, Louisburg, NC 27549	Sec. 18-T141N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Penney Files	3387 West Silver Springs Boulevard, Lot 13, Ocala, FL 34475	Sec. 18-T141N-R83W
Erika Files Hilliard	HC 5, Box 103-1, Gainesville, MO 65655	Sec. 18-T141N-R83W
J.C. Fore	303 S Okfuskee Avenue, Wewoka, OK 74884	Sec. 18-T141N-R83W
J.L. McMullen	127 N 4TH ST, Okemah OK 74859-2456 AND 215 S 5TH ST Okemah OK 74859-3808	Sec. 18-T141N-R83W
Lily Stamper	No street address of record, Okemah, OK 74859	Sec. 18-T141N-R83W
George R. McKown	No street address of record, Okemah, OK 74859	Sec. 18-T141N-R83W
Mabel M. Johnson	P. O. Box 114, Wewoka, OK 74884	Sec. 18-T141N-R83W
Gerthel B. Fore	303 S Okfuskee Avenue, Wewoka, OK 74884	Sec. 18-T141N-R83W
Mrs. O.C. Fore	303 S Okfuskee Avenue, Wewoka, OK 74884	Sec. 18-T141N-R83W
Alexander Hamilton	2nd and Francis Streets, St. Joseph, MO 64501	Sec. 18-T141N-R83W
Nick N. Kouloures	No address of record	Sec. 18-T141N-R83W
Florence L. Hedrick	324 E 3rd Street, Newton, KS 67114	Sec. 18-T141N-R83W
Albert A. Goering	P. O. Box 366, Newton, KS 67114	Sec. 18-T141N-R83W
W.T. Brown	No street address of record, Newton, KS 67114	Sec. 18-T141N-R83W
Dean E. Stucky and O. Jean Stucky, as joint tenants	901 North Walnut, Medicine Lodge, KS 67104	Sec. 18-T141N-R83W
PEC Minerals LP	14860 Montfort Drive, Suite 209, Dallas, TX 75254	Sec. 18-T141N-R83W
Walter Duncan, Inc.	100 Park Avenue, Suite 1200, Oklahoma City, OK 73102-8006	Sec. 18-T141N-R83W
Black Stone Minerals Company, L.P.	1001 Fannin, Suite 2020, Houston, TX 77002-6709	Sec. 18-T141N-R83W
Barbara Endres	11449 SW 68th Court, Ocala, FL 34476	Sec. 18-T141N-R83W
Ellen Emley	6871 South Spotswood Street, Littleton, CO 80120	Sec. 18-T141N-R83W
Robert J. Mosbrucker	P. O. Box 745, Bothell, WA 98041	Sec. 19-T141N-R83W
Winfred Keller	728 Custer Drive, Mandan, ND 58554	Sec. 19-T141N-R83W
Douglas A. Keller, Trustee of the Winfrid and Alice Keller Family Trust	913 Saint Thomas Trail, Mandan, ND 58554	Sec. 19-T141N-R83W
Jerald Reuther	405 E. Denver Avenue, Bismarck, ND 58503	Sec. 19-T141N-R83W
Wayne Reuther	4746 Glenwood Drive, Bismarck, ND 58504	Sec. 19-T141N-R83W
Kent Reuther	3610 27th Street SW, New Salem, ND 58563	Sec. 19-T141N-R83W
Keith Reuther	3594 27th Street SW, New Salem, ND 58563	Sec. 19-T141N-R83W
Karen Shulz	13720 Chamy Drive, Reno, NV 89521	Sec. 19-T141N-R83W
Charles H. Kuether	Route #1, Box 45, New Salem, ND 58563	Sec. 19-T141N-R83W
Charles H. Kuether	3555 28th Street, New Salem, ND 58563	Sec. 19-T141N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Robert A Fryhling and Janice F. Fryhling, Trustees of the Fryhling Family Trust, dated August 15, 2002	2595 Calle Tres Lomas, San Diego, CA 92139	Sec. 19-T141N-R83W
Lila Wilson	Route #1, Box 45, New Salem, ND 58563	Sec. 19-T141N-R83W
Lois Hohimer	Route #1, Box 45, New Salem, ND 58563	Sec. 19-T141N-R83W
Madalyn Kraft	Route #1, Box 45, New Salem, ND 58563	Sec. 19-T141N-R83W
Central Dakota Humane Society	2104 37th Street, Mandan, ND 58554	Sec. 19-T141N-R83W
BNI Coal, Ltd.	2360 35th Avenue SW, Center, ND 58530-9499	Sec. 19-T141N-R83W
Earl Bodner	No address of record	Sec. 19-T141N-R83W
Erick G. Larson	50 Avalon Drive – Unit 7323, Milford CT 06460-8957	Sec. 19-T141N-R83W
Jack R. Hatzenbuhler and Helen Hatzenbuhler	3475 31st Street, Mandan, ND 58554	Sec. 27-T141N-R83W
Edward J. Koch	3359 Campstool Road, Cheyenne, WY 82007	Sec. 27-T141N-R83W
Randy L. Messer	3000 14th Avenue SE, Mandan, ND 58554	Sec. 27-T141N-R83W
Jacey Lee Messer	3000 14th Avenue SE, Mandan, ND 58554	Sec. 27-T141N-R83W
Gregory M. Messer	116 Pheasant Street, Bismarck, ND 58504	Sec. 27-T141N-R83W
Jennifer M. Messer	3000 14th Avenue SE, Mandan, ND 58554	Sec. 27-T141N-R83W
Jamie N. Messer	3000 14th Avenue SE, Mandan, ND 58554	Sec. 27-T141N-R83W
Jesse C. Messer	3000 14th Avenue SE, Mandan, ND 58554	Sec. 27-T141N-R83W
Ronald F. Messer	36 Santee Road, Lincoln, ND 58504	Sec. 27-T141N-R83W
Heather A. Messer	36 Santee Road, Lincoln, ND 58504	Sec. 27-T141N-R83W
Ashley M. Messer	36 Santee Road, Lincoln, ND 58504	Sec. 27-T141N-R83W
Debra L. Haugen	4010 Morning Star Drive S, P. O. Box 235, Mandan, ND 58554	Sec. 27-T141N-R83W
Dominic J. Haugen	4010 Morning Star Drive S, P. O. Box 235, Mandan, ND 58554	Sec. 27-T141N-R83W
Dayton L. Haugen	4010 Morning Star Drive S, P. O. Box 235, Mandan, ND 58554	Sec. 27-T141N-R83W
Magdalena Koch	1205 Sunset Drive, Mandan, ND 58554	Sec. 27-T141N-R83W
John R. Hatzenbuhler and Ida Hatzenbuhler, as joint tenants	Route 1, Mandan, ND 58554	Sec. 27-T141N-R83W
Roberts' Royalty LLC	12239 Treeview Lane, Farmers Branch, TX 75234-7809	Sec. 27-T141N-R83W
James H. Luther Royalty, LLC	717 S View Terrace, Alexandria, VA 22314	Sec. 27-T141N-R83W
BM Marcus Royalty LLC	3948 SW Greencastle Avenue, Oxford, IA 52322	Sec. 27-T141N-R83W
Mary Langdon	11707 Monica Lane, Houston, TX 77024	Sec. 27-T141N-R83W
Martha Bauman	1513 Gaston, Austin, TX 78703	Sec. 27-T141N-R83W
El Campo Energy Partners, LLC	8815 Chalk Knoll Drive, Austin, TX 78735	Sec. 27-T141N-R83W
Graham Shinnick	No street address or zip code of record, Detroit, MI	Sec. 27-T141N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Robert Moody, Trustee of the Alice H. Cordes Revocable Trust, dated January 11, 2007	2343 E Sierra Street, Phoenix, AZ 85028	Sec. 27-T141N-R83W
Jane Z. Hooker	4743 N 54th Street, Phoenix, AZ 85018-1905	Sec. 27-T141N-R83W
V. G. Perry	No street address, Detroit, MI 48127	Sec. 27-T141N-R83W
United States of America	No address of record	Sec. 22-T141N-R83W
Delmar Hagerott	3170 27th Street, Center, ND 58530	Sec. 22-T141N-R83W
Delvin Bueligen and Jill Bueligen	709A 3rd Ave. SE, Mandan, ND 58554	Sec. 22-T141N-R83W
Rodella Hausauer and Barry Hausauer	1611 Castillian Way, Mundelein, IL 60060	Sec. 22-T141N-R83W
Lowell Bueligen and Tammy Bueligen	13621 Homestead Lane, Riverton, UT 84065	Sec. 22-T141N-R83W
James Orgaard	9589 Brentford Drive, Highlands Ranch, CO 80126	Sec. 22-T141N-R83W
Clifford Orgaard	11839 Forada Beach Road SE; Unit A, Alexandria, MN 56308	Sec. 22-T141N-R83W
Michael Orgaard	3010 27th Street, Center, ND 58530	Sec. 22-T141N-R83W
Steven Orgaard	2935 Manitoba Lane, Bismarck, ND 58501	Sec. 22-T141N-R83W
Arline Orgaard	2935 Manitoba Lane, Bismarck, ND 58501	Sec. 22-T141N-R83W
Norlan Hagerott	744 Lake Avenue, Ortonville, MN 56278	Sec. 22-T141N-R83W
Albert Hagerott	3190 27th Street, Center ND 58530-9559	Sec. 22-T141N-R83W
Mary Hagerott	Mary Hagerott Estate, c/o Justin Hagerott, 3192 27th Street SW, Center ND 58530	Sec. 22-T141N-R83W
Robert Edward Hagerott and Margaret Ruth Hagerott, Trustees, or their successors in trust, of the Robert Edward Hagerott Revocable Trust, dated February 14, 1997	86 Warren Street, Needham, MA 02492	Sec. 22-T141N-R83W
Edward C. Hagerott and Rosemary T. Hagerott, Trustees, or their successors in trust, under the Edward C. Hagerott and Rosemary T. Hagerott Living Trust dated April 29, 1999	136 West Bonita Avenue, Sierra Madre, CA 91024	Sec. 22-T141N-R83W
James Richard Keddy and Margaret R. Keddy, and successors, as Trustees of the Keddy Family Trust, dated January 14, 1994	16331 Serenade Lane, Huntington Beach, CA 92647	Sec. 22-T141N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Thomas Price	1211 Imperial Dr, Bismarck, ND 58504-7570 AND 115 Lakeview Dr, Watford City, ND 58854-7810 AND PO Box 96, Wolverton, MN 56594-0096 AND PO Box 631, Spencer, IN 47460-0631	Sec. 22-T141N-R83W
Dorothy L. Keck, Trustee of the Albert E. and Dorothy L. Keck Family Trust, dated July 21, 1989	1256 Cain Lane, Escondido, CA 92027	Sec. 22-T141N-R83W
Grace Ellen Janssen	Center, ND 58530	Sec. 22-T141N-R83W
Jack R. Hatzenbuhler and Helen Hatzenbuhler	3475 31st Street, Mandan, ND 58554	Sec. 22-T141N-R83W
Edward J. Koch	3359 Campstool Road, Cheyenne, WY 82007	Sec. 22-T141N-R83W
Randy L. Messer	3000 14th Avenue SE, Mandan, ND 58554	Sec. 22-T141N-R83W
Jacey Lee Messer	3000 14th Avenue SE, Mandan, ND 58554	Sec. 22-T141N-R83W
Gregory M. Messer	116 Pheasant Street, Bismarck, ND 58504	Sec. 22-T141N-R83W
Jennifer M. Messer	3000 14th Avenue SE, Mandan, ND 58554	Sec. 22-T141N-R83W
Jamie N. Messer	3000 14th Avenue SE, Mandan, ND 58554	Sec. 22-T141N-R83W
Jesse C. Messer	3000 14th Avenue SE, Mandan, ND 58554	Sec. 22-T141N-R83W
Ronald F. Messer	36 Santee Road Lincoln, ND, 58504	Sec. 22-T141N-R83W
Heather A. Messer	36 Santee Road Lincoln, ND, 58504	Sec. 22-T141N-R83W
Ashley M. Messer	36 Santee Road Lincoln, ND, 58504	Sec. 22-T141N-R83W
Debra L. Haugen	4010 Morning Star Drive S, P. O. Box 235, Mandan, ND 58554	Sec. 22-T141N-R83W
Dominic J. Haugen	4010 Morning Star Drive S, P. O. Box 235, Mandan, ND 58554	Sec. 22-T141N-R83W
Dayton L. Haugen	4010 Morning Star Drive S, P. O. Box 235, Mandan, ND 58554	Sec. 22-T141N-R83W
Magdalena Koch	1205 Sunset Drive, Mandan, ND 58554	Sec. 22-T141N-R83W
John R. Hatzenbuhler and Ida Hatzenbuhler, as joint tenants	Route 1, Mandan, ND 58554	Sec. 22-T141N-R83W
Roberts' Royalty LLC	12239 Treeview Lane, Farmers Branch, TX 75234-7809	Sec. 22-T141N-R83W
James H. Luther Royalty, LLC	717 S View Terrace, Alexandria, VA 22314	Sec. 22-T141N-R83W
BM Marcus Royalty LLC	3948 SW Greencastle Avenue, Oxford, IA 52322	Sec. 22-T141N-R83W
Mary Langdon	11707 Monica Lane, Houston, TX 77024	Sec. 22-T141N-R83W
Martha Bauman	1513 Gaston, Austin, TX 78703	Sec. 22-T141N-R83W
El Campo Energy Partners, LLC	8815 Chalk Knoll Drive, Austin, TX 78735	Sec. 22-T141N-R83W
Graham Shinnick	No street address, Detroit, MI 48127	Sec. 22-T141N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Robert Moody, Trustee of the Alice H. Cordes Revocable Trust, dated January 11, 2007	2343 E Sierra Street, Phoenix, AZ 85028	Sec. 22-T141N-R83W
Jane Z. Hooker	4743 N 54th Street, Phoenix, AZ 85018-1905	Sec. 22-T141N-R83W
V. G. Perry	No street address, Detroit, MI 48127	Sec. 22-T141N-R83W
Jolene Berger	3004 Manchester Street, Bismarck, ND 58504	Sec. 1-T141N-R84W
Travis Klatt and Jessica Klatt, as joint tenants	2438 37th Ave. SW, Center, ND 58530	Sec. 1-T141N-R84W
Gary Leinius	204 Hager Avenue, Stanton ND 58571 AND 4958 Highway 200, Hazen ND 58545	Sec. 1-T141N-R84W
State of North Dakota - Dept. of Trust Lands	1707 N 9th Street, Bismarck, ND 58501	Sec. 1-T141N-R84W
Red Crown Royalties, LLC	1490 W. Canal Court, Suite 3000, Littleton, CO 80120	Sec. 1-T141N-R84W
Ida Schwable	HC02 Box 258, Center, ND 58530	Sec. 1-T141N-R84W
Alvin Hagerott	HC2 Box 244, Center, ND 58530	Sec. 1-T141N-R84W
Ernst R. Lueneburg	2903 Manitoba Lane, Bismarck, ND 58501	Sec. 1-T141N-R84W
Glacier Park Company	801 Cherry Street, Fort Worth, TX 76102	Sec. 1-T141N-R84W
Frase-Tucker Resources, LLC	P.O. Box 994486, Redding, CA 96099	Sec. 1-T141N-R84W
Tenneco Oil Company	P.O. Box 2511, Houston, TX 77252	Sec. 1-T141N-R84W
Douglas D. Doll and Deberra K. Doll	3901 Faye Avenue N, Mandan, ND 58554	Sec. 20-T141N-R83W
Becky Jo Lemar	798 San Angelo Drive, Bismarck, ND 58503	Sec. 20-T141N-R83W
Wendy April Wittenberg	3032 Ontario Lane, Bismarck, ND 58503	Sec. 20-T141N-R83W
Danielle Kae Borseth	5025 Hitchcock Drive, Bismarck, ND 58503	Sec. 20-T141N-R83W
James D. Pazdernik and Bonita Pazdernik	3487 37th Avenue, New Salem, ND 58563	Sec. 20-T141N-R83W
Thomas Pazdernik	2582 Windsor Drive N, Mandan, ND 58554	Sec. 20-T141N-R83W
Matthew Pazdernik	2445 37th Street, Mandan, ND 58554	Sec. 20-T141N-R83W
Theresa Moravec	921 Mouton Avenue, Bismarck, ND 58505	Sec. 20-T141N-R83W
Michael Pazdernik	P. O. Box 194, New Salem, ND 58563	Sec. 20-T141N-R83W
Mark Pazdernik	22 3rd Street S, Carrington, ND 58421	Sec. 20-T141N-R83W
Joseph Edwin Marcy	2133 SE 57th Avenue, Portland, OR 97214	Sec. 20-T141N-R83W
Nancy L. Carr	219 Mariners Way, Savannah, GA 31419-9308	Sec. 20-T141N-R83W
Charles L. Marsters	3903 Gershwin Avenue N, St. Paul, MN 55128-3010	Sec. 20-T141N-R83W
Beverly R. Buttram	5176 N Blackbird Way, Boise, ID 83714-1780	Sec. 20-T141N-R83W
Sandra Kaye Gish	1654 SW Sagebrush Court, Dallas, TX 97338-1262	Sec. 20-T141N-R83W
Michael Charles Marsters	3920 Miranda Drive, Paris, TX 75462-6648	Sec. 20-T141N-R83W
David S. Marsters	4205 Saint Andrews Place, New Albany, IN 47150-9691	Sec. 20-T141N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Ronald P. Tuning	13300 NE Whitlow Lane, Newberg, OR 97132-6723	Sec. 20-T141N-R83W
Daniel R. Cottrell, Surviving Trustee of The Cottrell Trust, a revocable living trust, dated September 26, 1996, as restated on August 25, 2014	8330 Cason Road, Unit 219, Gladstone, OR 97027	Sec. 20-T141N-R83W
L. D. Jenkins c/o Gentry, LLC	4216 North Portland, Suite 104, Oklahoma City, OK 73112	Sec. 20-T141N-R83W
Willow Point Corporation c/o Gentry, LLC	4216 North Portland, Suite 104, Oklahoma City, OK 73112	Sec. 20-T141N-R83W
Gentry, LLC	4216 North Portland, Suite 104, Oklahoma City, OK 73112	Sec. 20-T141N-R83W
Daniel Landeis and Carol Landeis	2735 Boundary Road, Bismarck, ND 58503	Sec. 20-T141N-R83W
Jessica Oakland	2218 LaForrest, Bismarck, ND 58501	Sec. 20-T141N-R83W
Jonica Norick	615 East Wachter Avenue, Bismarck, ND 58504	Sec. 20-T141N-R83W
Judy Dick and Brian T. Dick	8948 Carr Circle, Broomfield, CO 80021	Sec. 20-T141N-R83W
Jodi Gragg	4487 South Ireland Lane, Aurora, Co 80015	Sec. 20-T141N-R83W
Jeremiah Bigelow	8948 Carr Circle, Broomfield, CO 80021	Sec. 20-T141N-R83W
Benjamin Bigelow	8948 Carr Circle, Broomfield, CO 80021	Sec. 20-T141N-R83W
Garrett Dick	598 East Dry Creek Place, Littleton, CO 80122	Sec. 20-T141N-R83W
Mandy Davis	8394 South Everett Way, #F, Littleton, CO 80128	Sec. 20-T141N-R83W
Roger Landeis and Diane Landeis	7752 South Columbine Street, Centennial, CO 80122	Sec. 20-T141N-R83W
Tamara Landeis	2836 Mount Carmel Road, Newnan, GA 30263	Sec. 20-T141N-R83W
Randy Landeis and Susan Corine	11096 W 104th Drive, Westminster, CO 80021	Sec. 20-T141N-R83W
Cory Lee Landeis	11625 Community Center Drive, Apt. 1311, Northglenn, CO 80233	Sec. 20-T141N-R83W
Carisa Nicole Landeis	436 North 5th Avenue, Brighton, CO 80601	Sec. 20-T141N-R83W
Donald Roerich and Justine Roerich	1131 Cannon Lane, Washburn, ND 58577	Sec. 20-T141N-R83W
Mason Roerich	1131 Cannon Lane, Washburn, ND 58577	Sec. 20-T141N-R83W
Memphis Roerich	1131 Cannon Lane, Washburn, ND 58577	Sec. 20-T141N-R83W
Katherine Mosbrucker	404 NW 13th Street, Mandan, ND 58554	Sec. 20-T141N-R83W
Ralph P. Kautzman	Center, ND 58530 AND 1408 Central Avenue, Mandan ND 58554	Sec. 20-T141N-R83W
Irene Kautzman	1408 Central Avenue, Mandan, ND 58554	Sec. 20-T141N-R83W
Robert J. Mosbrucker	P. O. Box 745, Bothell, WA 98041	Sec. 20-T141N-R83W
Winfrid Keller	728 Custer Drive, Mandan, ND 58554	Sec. 20-T141N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Douglas A. Keller, Trustee of the Winfrid and Alice Keller Family Trust	913 Saint Thomas Trail, Mandan, ND 58554	Sec. 20-T141N-R83W
Dale P. Pfliger and Judy Pfliger	806 Tower Place, Mandan, ND 58554	Sec. 20-T141N-R83W
Mathias Pfliger	2508 10th Avenue SE, Mandan, ND 58554	Sec. 20-T141N-R83W
Aaron Pfliger	708 17th Street NW, Mandan, ND 58554	Sec. 20-T141N-R83W
Thomas Pfliger	806 Tower Place, Mandan, ND 58554	Sec. 20-T141N-R83W
Anton Pfliger and Helen Pfliger	105 Division Street NW, Mandan, ND 58554	Sec. 20-T141N-R83W
LouAnn Nider	824 Lohstreter Road, Mandan, ND 58554	Sec. 20-T141N-R83W
Carol Pfliger Anderson	734 Aspen Place, Bismarck, ND 58503	Sec. 20-T141N-R83W
Sandra Olhauser	1829 San Diego Drive, Bismarck, ND 58504	Sec. 20-T141N-R83W
Sherry Marentette	7417 Marble Ridge, Austin, TX 78747	Sec. 20-T141N-R83W
Kari Ann Pfliger Warner	411 6th Avenue NW, Mandan, ND 58554	Sec. 20-T141N-R83W
Anton Pfliger and Helen Pfliger	105 Division Street NW, Mandan, ND 58554	Sec. 28-T141N-R83W
LouAnn Nider	824 Lohstreter Road, Mandan, ND 58554	Sec. 28-T141N-R83W
Carol Pfliger Anderson	734 Aspen Place, Bismarck, ND 58503	Sec. 28-T141N-R83W
Sandra Olhauser	1829 San Diego Drive, Bismarck, ND 58504	Sec. 28-T141N-R83W
Sherry Marentette	7417 Marble Ridge, Austin, TX 78747	Sec. 28-T141N-R83W
Kari Ann Pfliger Warner	411 6th Avenue NW, Mandan, ND 58554	Sec. 28-T141N-R83W
Marla Brown	28925 North Red Bloom Court, Whitman, AZ 85361	Sec. 28-T141N-R83W
Holli K. Taylor	28827 N 254th Lane, Whitman, AZ 85361	Sec. 28-T141N-R83W
Myra Buntin	19425 Lower Territory Road, Prescott, AZ 86305	Sec. 28-T141N-R83W
Darrell Ray Buntin III	P. O. Box 167, Chino Valley, AZ 86323	Sec. 28-T141N-R83W
Marie Pfliger	717 Solano Drive, Prescott, AZ 86301	Sec. 28-T141N-R83W
Dale P. Pfliger and Judy Pfliger	806 Tower Place, Mandan, ND 58554	Sec. 28-T141N-R83W
Mathias Pfliger	2508 10th Avenue SE, Mandan, ND 58554	Sec. 28-T141N-R83W
Aaron Pfliger	708 17th Street NW, Mandan, ND 58554	Sec. 28-T141N-R83W
Thomas Pfliger	806 Tower Place, Mandan, ND 58554	Sec. 28-T141N-R83W
Clementine Freisz	710 Pine Avenue, New Salem, ND 58563	Sec. 28-T141N-R83W
Sandra K. Orgaard	2810 26th Street, Center, ND 58530	Sec. 28-T141N-R83W
Roger A. Friesz	797 7th Street, Idaho Falls, ID 83401	Sec. 28-T141N-R83W
Duane M. Friesz	4465 34th Street, New Salem, ND 58563	Sec. 28-T141N-R83W
Karen M. Porsborg	2720 37th Avenue SW, New Salem, ND 58563	Sec. 28-T141N-R83W
Michael J. Friesz	3463 County Road 87, New Salem, ND 58563	Sec. 28-T141N-R83W
Audrey A. Peterson	12719 Doris Drive, Black Hawk, SD 57718	Sec. 28-T141N-R83W
Marshall & Winston, Inc.	P. O. Box 50880, Midland, TX 79710-0880	Sec. 28-T141N-R83W
Hancock Enterprises	P. O. Box 2527, Billings, MT 59103	Sec. 28-T141N-R83W
Fortin Enterprises, Inc.	P.O. Box 3129, Palm Beach, FL 33480	Sec. 28-T141N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
DeKalb Energy Company	1625 Broadway Suite 1300, Denver, CO 80202-4713	Sec. 28-T141N-R83W
Anton Pflieger and Helen Pflieger	105 Division Street NW, Mandan, ND 58554	Sec. 21-T141N-R83W
LouAnn Nider	824 Lohstreter Road, Mandan, ND 58554	Sec. 21-T141N-R83W
Carol Pflieger Anderson	734 Aspen Place, Bismarck, ND 58503	Sec. 21-T141N-R83W
Sandra Olhauser	1829 San Diego Drive, Bismarck, ND 58504	Sec. 21-T141N-R83W
Sherry Marentette	7417 Marble Ridge, Austin, TX 78747	Sec. 21-T141N-R83W
Kari Ann Pflieger Warner	411 6th Avenue NW, Mandan, ND 58554	Sec. 21-T141N-R83W
Marla Brown	28925 North Red Bloom Court, Whitman, AZ 85361	Sec. 21-T141N-R83W
Holli K. Taylor	28827 N 254th Lane, Whitman, AZ 85361	Sec. 21-T141N-R83W
Myra Buntin	19425 Lower Territory Road, Prescott, AZ 86305	Sec. 21-T141N-R83W
Darrell Ray Buntin III	P. O. Box 167, Chino Valley, AZ 86323	Sec. 21-T141N-R83W
Amanda Marie Minick	4332 S Fireside Trail, Gilbert, AZ 85297	Sec. 21-T141N-R83W
Marie Pflieger	717 Solano Drive, Prescott, AZ 86301 AND 1487 Horseshoe Bend Drive, #37, Camp Verde, AZ 86322	Sec. 21-T141N-R83W
Delmar Hagerott	3170 27th Street, Center, ND 58530	Sec. 21-T141N-R83W
Delvin Bueligen and Jill Bueligen	709A 3rd Ave. SE, Mandan, ND 58554	Sec. 21-T141N-R83W
Lowell Bueligen and Tammy Bueligen	13621 Homestead Lane, Riverton, UT 84065	Sec. 21-T141N-R83W
Rodella Hausauer and Barry Hausauer	1611 Castillian Way, Mundelein, IL 60060	Sec. 21-T141N-R83W
James Orgaard	9589 Brentford Drive, Highlands Ranch, CO 80126	Sec. 21-T141N-R83W
Clifford Orgaard	11839 Forada Beach Road SE; Unit A, Alexandria, MN 56308	Sec. 21-T141N-R83W
Michael Orgaard	3010 27th Street, Center, ND 58530	Sec. 21-T141N-R83W
Steven Orgaard	2935 Manitoba Lane, Bismarck, ND 58501	Sec. 21-T141N-R83W
Arline Orgaard	2935 Manitoba Lane, Bismarck, ND 58501	Sec. 21-T141N-R83W
Norlan Hagerott	744 Lake Avenue, Ortonville, MN 56278	Sec. 21-T141N-R83W
Albert Hagerott	3190 27th Street, Center ND 58530-9559	Sec. 21-T141N-R83W
Mary Hagerott	Mary Hagerott Estate, c/o Justin Hagerott, 3192 27th Street SW, Center, ND 58530	Sec. 21-T141N-R83W
Robert Edward Hagerott and Margaret Ruth Hagerott, Trustees, or their successors in trust, of the Robert Edward Hagerott Revocable Trust, dated February 14, 1997	86 Warren Street, Needham, MA 02492	Sec. 21-T141N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Edward C. Hagerott and Rosemary T. Hagerott, Trustees, or their successors in trust, under the Edward C. Hagerott and Rosemary T. Hagerott Living Trust dated April 29, 1999	136 West Bonita Avenue, Sierra Madre, CA 91024	Sec. 21-T141N-R83W
James Richard Keddy and Margaret R. Keddy, and successors, as Trustees of the Keddy Family Trust, dated January 14, 1994	16331 Serenade Lane, Huntington Beach, CA 92647	Sec. 21-T141N-R83W
Thomas Price	1211 Imperial Dr, Bismarck, ND 58504-7570 AND 115 Lakeview Dr, Watford City, ND 58854-7810 AND PO Box 96, Wolverton, MN 56594-0096 AND PO Box 631, Spencer, IN 47460-0631	Sec. 21-T141N-R83W
Dorothy L. Keck, Trustee of the Albert E. and Dorothy L. Keck Family Trust, dated July 21, 1989	1256 Cain Lane, Escondido, CA 92027	Sec. 21-T141N-R83W
Grace Ellen Janssen	204 Juniper Dr., Bismarck, ND 58503-0292	Sec. 21-T141N-R83W
Douglas D. Doll and Deberra K. Doll	3901 Faye Avenue N, Mandan, ND 58554	Sec. 21-T141N-R83W
Becky Jo Lemar	798 San Angelo Drive, Bismarck, ND 58503	Sec. 21-T141N-R83W
Wendy April Wittenberg	3032 Ontario Lane, Bismarck, ND 58503	Sec. 21-T141N-R83W
Danielle Kae Borseth	5025 Hitchcock Drive, Bismarck, ND 58503	Sec. 21-T141N-R83W
James D. Pazdernik and Bonita Pazdernik	3487 37th Avenue, New Salem, ND 58563	Sec. 21-T141N-R83W
Thomas Pazdernik	2582 Windsor Drive N, Mandan, ND 58554	Sec. 21-T141N-R83W
Matthew Pazdernik	2445 37th Street, Mandan, ND 58554	Sec. 21-T141N-R83W
Theresa Moravec	921 Mouton Avenue, Bismarck, ND 58505	Sec. 21-T141N-R83W
Michael Pazdernik	P. O. Box 194, New Salem, ND 58563	Sec. 21-T141N-R83W
Mark Pazdernik	22 3rd Street S, Carrington, ND 58421	Sec. 21-T141N-R83W
Daniel Landeis and Carol Landeis	2735 Boundary Road, Bismarck, ND 58503	Sec. 21-T141N-R83W
Jessica Oakland	2218 LaForrest, Bismarck, ND 58501	Sec. 21-T141N-R83W
Jonica Norick	615 East Wachter Avenue, Bismarck, ND 58504	Sec. 21-T141N-R83W
Judy Dick and Brian T. Dick	8948 Carr Circle, Broomfield, CO 80021	Sec. 21-T141N-R83W
Jodi Gragg	4487 South Ireland Lane, Aurora, CO 80015	Sec. 21-T141N-R83W
Jeremiah Bigelow	8948 Carr Circle, Broomfield, CO 80021	Sec. 21-T141N-R83W
Benjamin Bigelow	8948 Carr Circle, Broomfield, CO 80021	Sec. 21-T141N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Garrett Dick	598 East Dry Creek Place, Littleton, CO 80122	Sec. 21-T141N-R83W
Mandy Davis	8394 South Everett Way, #F, Littleton, CO 80128	Sec. 21-T141N-R83W
Roger Landeis and Diane Landeis	7752 South Columbine Street, Centennial, CO 80122	Sec. 21-T141N-R83W
Tamara Landeis	2836 Mount Carmel Road, Newnan, GA 30263	Sec. 21-T141N-R83W
Randy Landeis and Susan Corine	11096 W 104th Drive, Westminster, CO 80021	Sec. 21-T141N-R83W
Cory Lee Landeis	11625 Community Center Drive, Apt. 1311, Northglenn, CO 80233	Sec. 21-T141N-R83W
Carisa Nicole Landeis	436 North 5th Avenue, Brighton, CO 80601	Sec. 21-T141N-R83W
Donald Roerich and Justine Roerich	1131 Cannon Lane, Washburn, ND 58577	Sec. 21-T141N-R83W
Mason Roerich	1131 Cannon Lane, Washburn, ND 58577	Sec. 21-T141N-R83W
Memphis Roerich	1131 Cannon Lane, Washburn, ND 58577	Sec. 21-T141N-R83W
Katherine Mosbrucker	404 NW 13th Street, Mandan, ND 58554	Sec. 21-T141N-R83W
Ralph P. Kautzman	1408 Central Avenue, Mandan, ND 58554	Sec. 21-T141N-R83W
Irene Kautzman	1408 Central Avenue, Mandan, ND 58554	Sec. 21-T141N-R83W
Mrs. Emanuel Kautzman	No address of record, Yakima WA 98901	Sec. 21-T141N-R83W
Estate of George Hagel, deceased	P.O. Box 223, Center, ND 58530	Sec. 2-T141N-R84W
City of Center Park District	No street address and zip code of record, Center ND	Sec. 2-T141N-R84W
James Hagel	746 E. 4th Ave., Kennewick, WA 99336	Sec. 2-T141N-R84W
Gene Hagel	9131 Prairie Vista Dr. NE, Albuquerque, NM 87113	Sec. 2-T141N-R84W
Kathy Lipp	4744 Thornburg Dr., Bismarck, ND 58504	Sec. 2-T141N-R84W
Loretta Rath	2606 Village Drive, Bismarck, ND 58505	Sec. 2-T141N-R84W
Julie Zahn	404 1st St. SW, Beulah, ND 58523	Sec. 2-T141N-R84W
Betty Yantzer	2745 18th St. SW, Center, ND 58530	Sec. 2-T141N-R84W
Jackie Schwab	938 Elbowoods Dr., Hazen, ND 58545	Sec. 2-T141N-R84W
Janice Matthews	P.O. Box 626, Washburn, ND 58577	Sec. 2-T141N-R84W
United States of America	No address of record	Sec. 2-T141N-R84W
Estate of Nick M. Berger, deceased	2529 37th Avenue SW, Center, ND 58530	Sec. 2-T141N-R84W
State Treasurer, as Trustee of the State of North Dakota	1707 N 9th Street, Bismarck, ND 58501	Sec. 2-T141N-R84W
Karmen Boehm	907 Nishu Place, Hazen, ND 58545	Sec. 2-T141N-R84W
Karle Boehm	1017 Fayette Drive, Hazen, ND 58545	Sec. 2-T141N-R84W
Dwight Wrangham and Linda Wrangham, as joint tenants	301 52nd St. SE, Bismarck, ND 58501	Sec. 2-T141N-R84W
Eileen Rooney Hewgley, L.L.C.	427 South Boston Avenue, Suite 304, Tulsa, OK 74103	Sec. 2-T141N-R84W
RLand, L.L.C.	401 South Boston Avenue, Suite 2400, Tulsa, OK 74103	Sec. 2-T141N-R84W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Patrick T. Rooney, Timothy P. Rooney, James Harris Rooney, and L.F. Rooney III, as Co-Trustees of The L.F. Rooney III Trust, created by the Lucy T. Rooney 1992 GST Exempt Family Trusts under Trust Agreement dated August 18, 1992	7 Spring Creek Road, Muskogee OK 74401	Sec. 2-T141N-R84W
Patrick T. Rooney, Timothy P. Rooney, James Harris Rooney, and L.F. Rooney III, as Co-Trustees of The Patrick T. Rooney Trust, created by the Lucy T. Rooney 1992 GST Exempt Family Trusts under Trust Agreement dated August 18, 1992	No address of record	Sec. 2-T141N-R84W
Patrick T. Rooney, Timothy P. Rooney, James Harris Rooney, and L.F. Rooney III, as Co-Trustees of The Timothy P. Rooney Trust, created by the Lucy T. Rooney 1992 GST Exempt Family Trusts under Trust Agreement dated August 18, 1992	7 Spring Creek Road, Muskogee OK 74401	Sec. 2-T141N-R84W
Patrick T. Rooney, Timothy P. Rooney, James Harris Rooney, and L.F. Rooney III, as Co-Trustees of The James Harris Rooney Trust, created by the Lucy T. Rooney 1992 GST Exempt Family Trusts under Trust Agreement dated August 18, 1992	7 Spring Creek Road, Muskogee OK 74401	Sec. 2-T141N-R84W
Patrick T. Rooney, Timothy P. Rooney, James Harris Rooney, and L.F. Rooney III, as Co-Trustees The Lucy Rooney Kapples Trust, created by the Lucy T. Rooney 1992 GST Exempt Family Trusts under Trust Agreement dated August 18, 1992	7 Spring Creek Road, Muskogee, OK 74401	Sec. 2-T141N-R84W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Patrick T. Rooney, Timothy P. Rooney, James Harris Rooney, and L.F. Rooney III, as Co-Trustees of The Rebecca Finch Rooney Trust, created by the Lucy T. Rooney 1992 GST Exempt Family Trusts under Trust Agreement dated August 18, 1992	7 Spring Creek Road, Muskogee, OK 74401	Sec. 2-T141N-R84W
Osprey Resources, Inc.	P.O. Box 56449, Houston, TX 77256-6449	Sec. 2-T141N-R84W
Mary Michael Genung	885 Live Oak Ridge Road, West Lake Hills, TX 78746	Sec. 2-T141N-R84W
Gonzaga University Law Dept. Scholarship	22H E. Euclid, Spokane, WA 99207	Sec. 2-T141N-R84W
J.C. Miller	508 Beacon Building, Tulsa, OK 74103	Sec. 2-T141N-R84W
Ralph M. Fahrenwald and Edna M. Fahrenwald, as joint tenants	3737 E. 45th Street, Tulsa, OK 74135	Sec. 2-T141N-R84W
Noah W. Millsap and Nell Rose Millsap, as joint tenants	1927 E. 33rd Place, Tulsa, OK 74105	Sec. 2-T141N-R84W
W.A. Dean and Fonda G. Dean, as joint tenants	1316 East 35th Place, Tulsa, OK 74105	Sec. 2-T141N-R84W
Delmar Hagerott	3170 27th Street, Center, ND 58530	Sec. 29-T141N-R83W
Delvin Bueligen and Jill Bueligen	709A 3rd Ave. SE, Mandan, ND 58554	Sec. 29-T141N-R83W
Rodella Hausauer and Barry Hausauer	1611 Castillian Way, Mundelein, IL 60060	Sec. 29-T141N-R83W
Lowell Bueligen and Tammy Bueligen	13621 Homestead Lane, Riverton, UT 84065	Sec. 29-T141N-R83W
James Orgaard	9589 Brentford Drive, Highlands Ranch, CO 80126	Sec. 29-T141N-R83W
Clifford Orgaard	11839 Forada Beach Road SE; Unit A, Alexandria, MN 56308	Sec. 29-T141N-R83W
Michael Orgaard	3010 27th Street, Center, ND 58530	Sec. 29-T141N-R83W
Steven Orgaard	2935 Manitoba Lane, Bismarck, ND 58501	Sec. 29-T141N-R83W
Arline Orgaard	2935 Manitoba Lane, Bismarck, ND 58501	Sec. 29-T141N-R83W
Norlan Hagerott	744 Lake Avenue, Ortonville, MN 56278	Sec. 29-T141N-R83W
Albert Hagerott	3190 27th Street, Center ND 58530-9559	Sec. 29-T141N-R83W
Mary Hagerott	Mary Hagerott Estate, c/o Justin Hagerott, 3192 27th Street SW, Center ND 58530	Sec. 29-T141N-R83W
Robert Edward Hagerott and Margaret Ruth Hagerott, Trustees, or their successors in trust, of the Robert Edward Hagerott Revocable Trust, dated February 14, 1997	86 Warren Street, Needham, MA 02492	Sec. 29-T141N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Edward C. Hagerott and Rosemary T. Hagerott, Trustees, or their successors in trust, under the Edward C. Hagerott and Rosemary T. Hagerott Living Trust dated April 29, 1999	136 West Bonita Avenue, Sierra Madre, CA 91024	Sec. 29-T141N-R83W
James Richard Keddy and Margaret R. Keddy, and successors, as Trustees of the Keddy Family Trust, dated January 14, 1994	16331 Serenade Lane, Huntington Beach, CA 92647	Sec. 29-T141N-R83W
Thomas Price	1211 Imperial Dr, Bismarck, ND 58504-7570 AND 115 Lakeview Dr, Watford City, ND 58854-7810 AND PO Box 96, Wolverton, MN 56594-0096 AND PO Box 631, Spencer, IN 47460-0631	
Dorothy L. Keck, Trustee of the Albert E. and Dorothy L. Keck Family Trust, dated July 21, 1989	1256 Cain Lane, Escondido, CA 92027	Sec. 29-T141N-R83W
Grace Ellen Janssen	Center, ND 58530	Sec. 29-T141N-R83W
Alvin Hagerott	HC2, Box 244, Center, ND 58530	Sec. 29-T141N-R83W
Dora Porsborg	Mandan Villa, Mandan, ND 58554	Sec. 29-T141N-R83W
Nels Porsborg	Mandan Villa, Mandan, ND 58554	Sec. 29-T141N-R83W
Dora Porsborg and Nels Porsborg c/o Kenneth Porsborg and Myron Porsborg	Route 1, Box 47A, Mandan, ND 58554	Sec. 29-T141N-R83W
Great Northern Properties LP	601 Jefferson Street; Suite 3600, Houston, TX 77002	Sec. 29-T141N-R83W
Meridian Minerals Company	5613 DTC Parkway, Suite 1100, Englewood, CO 80111	Sec. 29-T141N-R83W
Meridian Minerals Company	2919 Allen Parkway, Houston, TX 77019-2142	Sec. 29-T141N-R83W
Fern Bueligen	3022 Withers Drive, Mandan, ND 58554	Sec. 29-T141N-R83W
Steven P. Kraft and Julie F. Kraft, as joint tenants	2847 35th Avenue, New Salem, ND 58563	Sec. 29-T141N-R83W
Robert Mosbrucker	P. O. Box 745, Bothell, WA 98041	Sec. 29-T141N-R83W
Sandra Smith, Co-Trustee of the Kautzman Family Irrevocable Trust under agreement dated June 30, 2008	1320 County Road 80, Mandan, ND 58558	Sec. 29-T141N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Collette Friedt, Co-Trustee of the Kautzman Family Irrevocable Trust under agreement dated June 30, 2008	802 Wagon Trail Street, Gillette, WY 82718	Sec. 29-T141N-R83W
Stacy Kautzman, Co-Trustee of the Kautzman Family Irrevocable Trust under agreement dated June 30, 2008	9301 Wentworth Drive, Bismarck, ND 58503	Sec. 29-T141N-R83W
Jean L. Kautzman	2130 41st Avenue SW, Center, ND 58530	Sec. 29-T141N-R83W
Jay Kautzman	2024 N 5th Street, Bismarck, ND 58501	Sec. 29-T141N-R83W
Julie Frye	1853 N 23rd Street, Bismarck, ND 58501	Sec. 29-T141N-R83W
Janet Anderson	15537 East Radcliffe Place, Aurora, CO 80015	Sec. 29-T141N-R83W
Jeanine Marcolina	3938 East San Pedro, Gilbert, AZ 85234	Sec. 29-T141N-R83W
Douglas H. Kautzman	3450 County Road 138, Mandan, ND 58554	Sec. 29-T141N-R83W
Delmar Hagerott	3170 27th Street, Center, ND 58530	Sec. 13-T141N-R84W
Delvin Bueligen	709A 3rd Ave. SE, Mandan, ND 58554	Sec. 13-T141N-R84W
Rodella Hausauer	1611 Castillian Way, Mundelein, IL 60060	Sec. 13-T141N-R84W
Lowell Bueligen	13621 Homestead Lane, Riverton, UT 84065	Sec. 13-T141N-R84W
James Orgaard	9589 Brentford Drive, Highlands Ranch, CO 80126	Sec. 13-T141N-R84W
Clifford Orgaard	11839 Forada Beach Road SE; Unit A, Alexandria, MN 56308	Sec. 13-T141N-R84W
Michael Orgaard	3010 27th Street, Center, ND 58530	Sec. 13-T141N-R84W
Steven Orgaard	2935 Manitoba Lane, Bismarck, ND 58501	Sec. 13-T141N-R84W
Arline Orgaard	2935 Manitoba Lane, Bismarck, ND 58501	Sec. 13-T141N-R84W
Lynn C. Orgaard	2935 Manitoba Lane, Bismarck, ND 58501	Sec. 13-T141N-R84W
Fern Bueligen	3022 Withers Drive, Mandan, ND 58554	Sec. 13-T141N-R84W
Richard Bueligen	3022 Withers Drive, Mandan, ND 58554	Sec. 13-T141N-R84W
Norlan Hagerott	744 Lake Avenue, Ortonville, MN 56278	Sec. 13-T141N-R84W
Dollie Hagerott	744 Lake Avenue, Ortonville, MN 56278	Sec. 13-T141N-R84W
Annette Hatzenbihler	310 W Tonk, Gillette, WY 82718	Sec. 13-T141N-R84W
Nancy Henke and Dwight Henke	P. O. Box 90, Hazen, ND 58545	Sec. 13-T141N-R84W
Brent Hatzenbihler	310 W Tonk, Gillette, WY 82718	Sec. 13-T141N-R84W
Melissa Hatlestad	2372 Harmon Lane, Mandan, ND 58554	Sec. 13-T141N-R84W
Travis Henke	965 Gregory Lane, Mountain Home, ID 83647	Sec. 13-T141N-R84W
Rodney Hatzenbihler	2660 30th Avenue, Center, ND 58530	Sec. 13-T141N-R84W
State of North Dakota Dept. of Trust Lands	1707 N 9th Street, Bismarck, ND 58501	Sec. 13-T141N-R84W
Mark Erhardt	P. O. Box 132, Center, ND 58530	Sec. 13-T141N-R84W
Margaret Erhardt	3685 27th Street, New Salem, ND 58563-9617	Sec. 13-T141N-R84W
Kathryn Erhardt	P. O. Box 132, Center, ND 58530	Sec. 13-T141N-R84W
Agnes Phagan	419 Mathias Street, Taft, TX 78390	Sec. 13-T141N-R84W
Isabelle Forster	851 4th Avenue E, Dickinson, ND 58601	Sec. 13-T141N-R84W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Evangeline Bolton	1951 Carbon Ridge Street, Enumclaw, WA 98022	Sec. 13-T141N-R84W
Lorraine Bosch	851 4th Avenue E, Dickinson, ND 58601	Sec. 13-T141N-R84W
Ann Pasley	13838 162nd Avenue NE, Woodinville, WA 98072	Sec. 13-T141N-R84W
Scott Erhardt	3101 85M Avenue SW, Richardton, ND 58657	Sec. 13-T141N-R84W
Laura Kordonowy	2329 Main Street, Dickinson, ND 58601	Sec. 13-T141N-R84W
Alice Christianson	2585 Dakota Boulevard, Apt. 323, Dickinson, ND 58601	Sec. 13-T141N-R84W
Alice Frederick	Route 2 24C, Dickinson, ND 58601	Sec. 13-T141N-R84W
Marcus C. Erhardt	332 Wehrle Drive, Richardton, ND 58652	Sec. 13-T141N-R84W
Perry Erhardt	597 Twin Oaks Lane, Dallas, GA 30157	Sec. 13-T141N-R84W
Edward Erhardt	3105 85M Avenue SW, Richardton, ND 58652	Sec. 13-T141N-R84W
Wallace Erhardt	119 East Calgary Avenue, Bismarck, ND 58503	Sec. 13-T141N-R84W
Gloria Ciavarella	119 East Calgary Avenue, Bismarck, ND 58503	Sec. 13-T141N-R84W
Rose Erhardt	No street address of record, Dickinson, ND 58601	Sec. 13-T141N-R84W
Ronald P. Erhardt	No street address of record, Williston, ND 58801/58802/58803	Sec. 13-T141N-R84W
Rhoda P. Erhardt	2379 Snowshoe Court E, St. Paul, MN 55119	Sec. 13-T141N-R84W
Dorothy Mae Erhardt	Dickinson, ND 58601	Sec. 13-T141N-R84W
United States of America	No address of record	Sec. 14-T141N-R84W
Donald C. Erhard and Kathleen Erhardt	2955 37th Avenue SW, New Salem, ND 58563	Sec. 14-T141N-R84W
Lee Dresser	P. O. Box 683, Riverdale, ND 58565	Sec. 14-T141N-R84W
Yvonne Schmidt	3611 42nd Street NW, Mandan, ND 58554	Sec. 14-T141N-R84W
Raymond Schmidt, Sr. Estate	3611 42nd Street NW, Mandan, ND 58554	Sec. 14-T141N-R84W
Terrence Schmidt	515 Nottingham Drive, Bismarck, ND 58504	Sec. 14-T141N-R84W
Randall Schmidt	4817 Roughrider Circle, Mandan, ND 58554	Sec. 14-T141N-R84W
Raymond Schmidt, Jr.	5735 Highland Road, Mandan, ND 58554	Sec. 14-T141N-R84W
Marsha Strecker	P. O. Box 105, South Heart, ND 58655	Sec. 14-T141N-R84W
JoAnne Snow	329 Bedford Blvd., Bismarck, ND 58504	Sec. 14-T141N-R84W
Jeffrey Schmidt	3611 42nd Street NW, Mandan, ND 58554	Sec. 14-T141N-R84W
Margaret Schmidt	1305 2nd Street NW, Mandan, ND 58554	Sec. 14-T141N-R84W
Rose Royalty, LLC	6730 N Scottsdale Road; Ste. 270, Scottsdale, AZ 85253	Sec. 14-T141N-R84W
Cooper Land Family, LLC	460 Oak Hill Road, Chaska, MN 55318	Sec. 14-T141N-R84W
Kristoffer J. Land	12275 Berea Court, Poway, CA 92064	Sec. 14-T141N-R84W
Solveig K. Land, Trustee of the Solveig K. Land Revocable Trust Agreement, dated August 2, 2008	310 Parkway Court, Minneapolis, MN 55419	Sec. 14-T141N-R84W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Mike Golden	P. O. Box 2734, Bismarck, ND 58502	Sec. 14-T141N-R84W
A. G. Golden	P. O. Box 1853, Bismarck, ND 58502	Sec. 14-T141N-R84W
Peter Mosbrucker	No street address of record, New Salem, ND 58563	Sec. 14-T141N-R84W
Jesse L. Lackman and Darcy J. Lackman Revocable Living Trust	2647 37th Avenue SW, Center, ND 58530	Sec. 14-T141N-R84W
Raymond Mizak and Phyllis F. Mizak	794 E Gemini Place, Chandler, AZ 85249	Sec. 14-T141N-R84W
Armstrong Minerals, LLC	P. O. Box 1999, Dickinson, ND 58602	Sec. 14-T141N-R84W
Julie M. Fadden and Gordon W. Schnell, Co-Trustees of the Patrick Fadden Residuary Trust	1007 Highland Place, Bismarck, ND 58501	Sec. 14-T141N-R84W
Richard E. Haug	668 W 27th, Dickinson, ND 58601	Sec. 14-T141N-R84W
W. R. Everett	668 W 27th, Dickinson, ND 58601	Sec. 14-T141N-R84W
Michelle M. Miller	668 W 27th, Dickinson, ND 58601	Sec. 14-T141N-R84W
Dennis W. Yockim	P. O. Box 477, Williston, ND 58801	Sec. 14-T141N-R84W
Douglas C. McLeod	518 17th Street, Ste. 1525, Denver, CO 80202	Sec. 14-T141N-R84W
O. W. E. Oil Company	P. O. Box 422, Pauma Valley, CA 92061	Sec. 14-T141N-R84W
Crescent Energy, Inc.	Box 1413, Scottsdale, AZ 85252-1413	Sec. 14-T141N-R84W
TurmOil, Inc.	P. O. Box 5, Bismarck, ND 58502	Sec. 14-T141N-R84W
The Carter Investment Company	333 Clay Street, Ste. 3439, Houston, TX 77002	Sec. 14-T141N-R84W
Black Stone Minerals Company, L.P.	1001 Fannin, Ste. 2020, Houston, TX 77002	Sec. 14-T141N-R84W
William G. Seal and Marcellyn J. Seal	4662 S Troost, Tulsa, OK 74170	Sec. 14-T141N-R84W
Robert C. Simpson, Trustee of the Robert C. Simpson Living Trust created by declaration of trust dated April 5, 1999	P. O. Box 700216 Tulsa, OK, 74170-0216	Sec. 14-T141N-R84W
John Williard Forsyth c/o Benjamin Forsyth	3301 9th Street E Great Falls, MT, 59404	Sec. 14-T141N-R84W
Martha Ann Forsyth Thomas	34 Creekside Close, Nellysford, VA 22958	Sec. 14-T141N-R84W
Benjamin Ripley Forsyth	3301 9th Street E, Great Falls, MT 59404	Sec. 14-T141N-R84W
L. R. Forsyth	L. R. Boughton (f.k.a. L. R. Forsyth), 1566 Texakoma Park Road, Kingston OK 73439-9324	Sec. 14-T141N-R84W
Thomas D. Selby	P. O. Box 2344, Williston, ND 58801	Sec. 14-T141N-R84W
M. Sue Bruce and Clifford R. Bruce, Sr., as Co-Trustees of the M. Sue Bruce Declaration of Trust dated January 30, 2015	36 Greenridge Drive, Decatur, IL 62526-1404	Sec. 14-T141N-R84W
Charles F. Smith c/o Mary Sue Bruce	36 Greenridge Drive, Decatur, IL 62526-1404	Sec. 14-T141N-R84W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Al Nick	111 Church Street, Ferguson, MO 63135	Sec. 14-T141N-R84W
Al E. Nick, Trustee of the Modak Trust A	111 Church Street, Ferguson, MO 63135	Sec. 14-T141N-R84W
Michael J. Wetzel	7880 Shelbyville Road, Indianapolis, IN 45259	Sec. 14-T141N-R84W
Aqua Purple Reef, LLC	7582 Mulholland Drive, Los Angeles, CA 9004	Sec. 14-T141N-R84W
Mary Catherine Watson	8136 Bishops Lane, Indianapolis, IN 46217	Sec. 14-T141N-R84W
Arkoma Bakken, LLC	203 E Interstate 30, Rockwall, TX 75087-5402	Sec. 14-T141N-R84W
Jean M. Voltz	9006 River Ridge Drive, Texarkana TX, 75503	Sec. 14-T141N-R84W
Rial Genre and Lynnette Genre	367 5th Street SW, Dickinson, ND 58601	Sec. 14-T141N-R84W
Margaret Leone Sutton Revocable Trust Agreement dated April 10, 1993	201 W Gibson Street, West Liberty, IA 52776	Sec. 14-T141N-R84W
Lynn C. Wright c/o Marjorie E. McKim	911 East Madison, Mt. Pleasant, IA 52641	Sec. 14-T141N-R84W
Pledge Resources, LLC	P. O. Box 1032, Bismarck, ND 58502	Sec. 14-T141N-R84W
Herbert Weder	Highland, IL 62249	Sec. 14-T141N-R84W
Jay W. Boulanger	9th and Lemon Streets, Highland, IL 62249	Sec. 14-T141N-R84W
Wray Boulanger	9th and Lemon Streets, Highland, IL 62249	Sec. 14-T141N-R84W
Orville A. Winet and Nelda E. Winet, as joint tenants	R. R. 3, Highland, IL 62249	Sec. 14-T141N-R84W
Susan Kim Ballinger, Successor Trustee of the Sutton Family Revocable Trust dated January 10, 1985/Jane Sutton	P. O. Box 1271, Catoosa, OK 74015	Sec. 14-T141N-R84W
Susan Kim Ballinger, Trustee of The Deborah Lynn Sutton Trust dated August 7, 2017	P. O. Box 1271, Catoosa, OK 74015	Sec. 14-T141N-R84W
Susan Kim Ballinger, Trustee of The David Keith Sutton Trust dated August 7, 2017	P. O. Box 1271, Catoosa, OK 74015	Sec. 14-T141N-R84W
Susan Kim Ballinger, Trustee of, The Ashley and Steven Ballinger Trust dated August 7, 2017	P. O. Box 1271, Catoosa, OK 74015	Sec. 14-T141N-R84W
Susan Kim Ballinger	P. O. Box 1271, Catoosa, OK 74015	Sec. 14-T141N-R84W
Steven Ballinger	P. O. Box 1271, Catoosa, OK 74015	Sec. 14-T141N-R84W
Missouri River Royalty Corporation	919 S 7th Street, Ste. 405, Bismarck, ND 58504	Sec. 14-T141N-R84W
Northern Pacific Royalties, LLC	P. O. Box 572, Bismarck, ND 58502	Sec. 14-T141N-R84W
Northern Energy Corporation	P. O. Box 2283, Bismarck, ND 58502	Sec. 14-T141N-R84W
Jane Ogilvie	23 Geneva Drive, Muscatine, IA 52761	Sec. 14-T141N-R84W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Mason W. Potter Estate, c/o Jane Ogilvie	23 Geneva Drive, Muscatine, IA 52761	Sec. 14-T141N-R84W
LARCO Resources, LLC	P. O. Box 821, Bismarck, ND 58502-0821	Sec. 14-T141N-R84W
Clark James Crawford	1930 Riverwood Drive, Bismarck, ND 58504	Sec. 14-T141N-R84W
Eliza A. Burkholder	111 Bellemont Road, Bloomington, IL 61701	Sec. 14-T141N-R84W
Chester C. Alexander and Ralph E. Alexander	1590 Martha Drive, Elgin, IL 60123	Sec. 14-T141N-R84W
Yank Litzelman	Olney, IL 62450	Sec. 14-T141N-R84W
Mabel Litzelman	Olney, IL 62450	Sec. 14-T141N-R84W
Bavendick Minerals & Royalty, LLC	P. O. Box 313, Bismarck, ND 58502-0313	Sec. 14-T141N-R84W
C. R. Hippard and Chas F. Hippard	108 Locust Street, Maroa, IL 61756	Sec. 14-T141N-R84W
Valerian L. Roberts	2921 Cronin Drive, Springfield, I, 62711	Sec. 14-T141N-R84W
Michael D. Glaspey and Joyce A. Glaspey	P. O. Box 77, Lignite, ND 58752	Sec. 14-T141N-R84W
Joe E. Harrison, Jr.	778 W Decatur Street, Decatur, I, 62522	Sec. 14-T141N-R84W
William C. Clements	Highland, IL 62249	Sec. 14-T141N-R84W
Sherry D. Wilkin and Paul W. Wilken	285 Falcon Drive E, Highland, IL, 62249	Sec. 14-T141N-R84W
Amelia R. Clements	No street address of record, Highland, IL 62249	Sec. 14-T141N-R84W
Shari R. Weber, Trustee of the Shari R. Weber Trust dated August 10, 2008	75-6100 Alii Drive, Kona Isle E 22, Kailua-Kona, HI 96740	Sec. 14-T141N-R84W
Betty Eileen Ferrel	3740 Pinebrook Circle, #107, Bradenton, FL 34209	Sec. 14-T141N-R84W
Rikki P. Doyle	3740 Pinebrook Circle, #207, Bradenton, FL 34209	Sec. 14-T141N-R84W
Marcy P. Stacy	5619 Open Gate Court, Cincinnati, OH 45247	Sec. 14-T141N-R84W
Bobby Gene Story	8749 N 600th Street, Newton, IL 62448	Sec. 14-T141N-R84W
Lee Eugene Story	7711 N 500th Street, Newton, IL 62448	Sec. 14-T141N-R84W
Paul D. Johnson, Trustee of the Declaration of Trust of Paul D. Johnson, dated April 5, 1996	105 N Lafayette, Newton, IL 62448	Sec. 14-T141N-R84W
Sandra K. Hartrich	13 Carriage Lane, Newton, IL 62448	Sec. 14-T141N-R84W
Lana Dhom	107 N Maple Street, Newton, IL 62448	Sec. 14-T141N-R84W
Bruce Hartrich	1209 Seasons Drive, Godfrey, IL 62035	Sec. 14-T141N-R84W
Eric Hartrich	1137 Drewsbury Court, Smyrna, GA 30080	Sec. 14-T141N-R84W
Judith Ann Hartrich and Dennis Hartrich	212 Cherry Lane, White House, TN 37188	Sec. 14-T141N-R84W
Julie Burns	212 Cherry Lane, White House, TN 37188	Sec. 14-T141N-R84W
Bradley Hartrich	212 Cherry Lane, White House, TN 37188	Sec. 14-T141N-R84W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Jill Han	212 Cherry Lane, White House, TN 37188	Sec. 14-T141N-R84W
Edward Kocher	16295 E 700th Avenue, Newton, IL 62448	Sec. 14-T141N-R84W
Scott A. Kocher	832 W 90th Avenue N, Conway Springs, KS 67031	Sec. 14-T141N-R84W
Matthew E. Kocher	4214 E State Hwy 234, Greenfield, IN 46140	Sec. 14-T141N-R84W
Gary Henry	257 Addison Way, Titusville, FL 32780	Sec. 14-T141N-R84W
Monica Snook	3406 Antietam Court, Edwardsville, IL 62025	Sec. 14-T141N-R84W
Melissa Cruz	13008 Pingry Place, Town & Country, MO 63131	Sec. 14-T141N-R84W
Melanie Byrkit	204 Magnolia Trace Drive, Ballwin, MO 63021	Sec. 14-T141N-R84W
Georgia Ann Upton	1783 Avenida Alta Mira, Oceanside, CA 92056	Sec. 14-T141N-R84W
John C. McElhiney	1720 Landisburg Road, Landisburg, PA 17040	Sec. 14-T141N-R84W
SHARK VENTURES, LLC	P. O. Box 2714, Bentonville, AR 72712	Sec. 14-T141N-R84W
Kent Littlejohn and Brenda Littlejohn	10777 N Friendship Road, Casey, IL 62420	Sec. 14-T141N-R84W
Jack L. Pitcher	6653 E 1800 Avenue, Montrose, IL 62445	Sec. 14-T141N-R84W
Melvin E. Pitcher	1065 Co. Rd. 000 N, Jewett IL 62436	Sec. 14-T141N-R84W
Marilyn J. James	24 Co. Rd. 1125 E, Jewett IL 62436	Sec. 14-T141N-R84W
Joyce Etnire	18931 Westfield Road, Charleston, IL, 61920	Sec. 14-T141N-R84W
Wayne Pitcher	11777 Destination Lane, Carthege, MO 64836	Sec. 14-T141N-R84W
Richard Pitcher	9000 U. S. Highway, Lot 575, Clermont, FL 34711	Sec. 14-T141N-R84W
Pam Goess	20 Lido Boulevard, Lake Grove, NY 11755	Sec. 14-T141N-R84W
Beverly Rosalee Shupe	206 N Marietta Street, Greenup, IL 62428	Sec. 14-T141N-R84W
Norma Elaine Edwards	262 Oak Avenue, Neoga, IL 62447	Sec. 14-T141N-R84W
Terry Eugene Warner	2537 Georgetown Road, Danville, IL 61832	Sec. 14-T141N-R84W
Stewart J. Schutte	6592 N 1075th Street, Robinson, IL 62454	Sec. 14-T141N-R84W
Tyler R. Tedford	10250 Wicklow Court, Fishers, IN 46040	Sec. 14-T141N-R84W
Kent A. Tedford	3823 N Ashland Avenue, #203, Chicago IL 60613	Sec. 14-T141N-R84W
David Porsborg and Karen Porsborg	2720 37th Avenue, New Salem, ND 58563	Sec. 24-T141N-R84W
Beverly Faul	1420 9th Avenue NE, McClusky, ND 58463	Sec. 24-T141N-R84W
Brad Bonnet	3444 110th Avenue NE, Bismarck, ND 58504	Sec. 24-T141N-R84W
Justin Kessler	6045 Lyndale Avenue S, #255, Minneapolis, MN 55419	Sec. 24-T141N-R84W
Adam Porsborg	2722 37th Avenue SW, New Salem, ND 58563	Sec. 24-T141N-R84W
Andrew Porsborg	2722 37th Avenue SW, New Salem, ND 58563	Sec. 24-T141N-R84W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Chad Porsborg	3206 Stonewall Drive, Bismarck, ND 58501	Sec. 24-T141N-R84W
Heather Bullinger	2602 10th Avenue SE, Mandan, ND 58554	Sec. 24-T141N-R84W
Christie Sorge	4412 E Mulberry, #312, Ft. Collins, CO 80524	Sec. 24-T141N-R84W
Tina Sorge	4412 E Mulberry, #312, Ft. Collins, CO 80524	Sec. 24-T141N-R84W
Jerald Reuther	405 E Denver Avenue, Bismarck, ND 58503	Sec. 24-T141N-R84W
Wayne Reuther	476 Glenwood Drive, Bismarck, ND 58504	Sec. 24-T141N-R84W
Keith Reuther	3594 27th Street SW, New Salem, ND 58563	Sec. 24-T141N-R84W
Karen Shulz	13720 Chamy Drive, Reno, NV 89521	Sec. 24-T141N-R84W
Kent Reuther and Pam Reuther	3610 27th Street SW, New Salem, ND 58563	Sec. 24-T141N-R84W
Dorothy Kessler	800 N Sewell Avenue, Miles City, MT 59301	Sec. 24-T141N-R84W
Dorothy Willem	1808 N Strevell, Miles City, MT 59301	Sec. 24-T141N-R84W
Jeannette Bonnet	1420 9th Avenue NW, McClusky, ND 58463	Sec. 24-T141N-R84W
Darlene Sorge	63 Lakeview Drive, Wheatland, WY 82201	Sec. 24-T141N-R84W
Robert Porsborg	415 1st Street E, Center, ND 58530	Sec. 24-T141N-R84W
Martha Reuther Estate, c/o Jerald Reuther	Martha Reuther Estate, c/o Jerald Reuther, 405 E Denver Avenue, Bismarck ND 58503 AND Martha Reuther Estate, c/o Jerald Reuther, New Salem ND 58563	Sec. 24-T141N-R84W
United States of America	No address of record	Sec. 10-T141N-R84W
Kenneth W. Reinke and Darlene Reinke	3841 25th Street SW, Center, ND 58530	Sec. 10-T141N-R84W
August W. Reinke Estate, c/o Kenneth W. Reinke	3841 25th Street SW, Center, ND 58530	Sec. 10-T141N-R84W
Lawrence Reinke, c/o Kenneth W. Reinke	3841 25th Street SW, Center, ND 58530	Sec. 10-T141N-R84W
Dora Reinke, c/o Kenneth W. Reinke	3841 25th Street SW, Center, ND 58530	Sec. 10-T141N-R84W
Walford Reinke, c/o Kenneth W. Reinke	3841 25th Street SW, Center, ND 58530	Sec. 10-T141N-R84W
Ervin Reinke, c/o Kenneth W. Reinke	3841 25th Street SW, Center, ND 58530	Sec. 10-T141N-R84W
Dora Schulte, c/o Kenneth W. Reinke	3841 25th Street SW, Center, ND 58530	Sec. 10-T141N-R84W
Grace Weiss, c/o Kenneth W. Reinke	3841 25th Street SW, Center, ND 58530	Sec. 10-T141N-R84W
B. W. Henderscheid and Alice Henderscheid	3635 Hwy 200A, Center, ND 58530	Sec. 3-T141N-R84W
Gloria R. Albers	852 Bermuda Drive, Hemet, CA, 92543	Sec. 3-T141N-R84W
Shannon Wade Henke	8921 Island Road, Bismarck, ND 58503	Sec. 3-T141N-R84W
Karla Rae Henke	1238 Hyacinth Lane, Peachtree City, GA 30269	Sec. 3-T141N-R84W
Verlaine Gullickson	701 33rd Avenue N, Unit 411, Fargo, ND 58102	Sec. 3-T141N-R84W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Agnes Dockter	2424 South 121st Street, Seattle, WA 98101	Sec. 15-T142N-R83W
Josephine McAdoo	No street address of record, Froid, MT 59226	Sec. 15-T142N-R83W
Anna Friesz	203 5th Avenue NE, Mandan, ND 58554	Sec. 15-T142N-R83W
Keith Vitek, as purported successor to the Estate of Clarence Vitek, deceased	P.O. Box 1214, Center, ND 58530	Sec. 15-T142N-R83W
Brenda Vitek, as purported successor to the Estate of Clarence Vitek, deceased	P.O. Box 1214, Center, ND 58530	Sec. 15-T142N-R83W
John Vitek	3002 South 208 Street, No. 8, Seattle WA, 98188	Sec. 15-T142N-R83W
Denisa Iwata f/k/a Denise Vitek	1458 Columbia Way 6, Seattle, WA 98178	Sec. 15-T142N-R83W
Sheila K. Naglich	11034 Crestwood Drive S, Seattle, WA 98178	Sec. 15-T142N-R83W
Gloria Iwata	1321 S. Puget Drive, E14, Renton, WA 98055	Sec. 15-T142N-R83W
Kathleen A. Rusich	4308 Lake Road, Apt. G, Killeen, WA 98146	Sec. 15-T142N-R83W
Sandra L. Vitek	10405 5th Avenue Southwest, Seattle, WA 98146	Sec. 15-T142N-R83W
Sacred Heart Hospice Donatory Corporation	1200 12th Street SW, Austin, MN 55912	Sec. 15-T142N-R83W
Karen O. Van Amburg, life tenant	2620 - 214th Avenue SE, Sammamish, WA 98075	Sec. 15-T142N-R83W
Jana Van Amburg, remainderman	2620 - 214th Avenue SE, Sammamish, WA 98075	Sec. 15-T142N-R83W
Matthew Van Amburg, remainderman	2620 - 214th Avenue SE, Sammamish, WA 98075	Sec. 15-T142N-R83W
Anne Cerulli, life tenant	13641 Alderwood Lane, 35B, Seal Beach, CA 90740	Sec. 15-T142N-R83W
Anthony James Cerulli, remainderman	2227 E. Everett Place, Orange, CA 92867	Sec. 15-T142N-R83W
Nathan Raymond Cerulli, remainderman	2227 E. Everett Place, Orange, CA 92867	Sec. 15-T142N-R83W
Black Stone Minerals Company, L.P.	1001 Fannin, Suite 2020, Houston, TX 77002	Sec. 15-T142N-R83W
Dorchester Minerals, L.P.	3838 Oak Lawn Avenue, Suite 300, Dallas, TX 75219	Sec. 15-T142N-R83W
Mike Saba a/k/a Michael P. Saba	26560 N. Shore Pl., Hartford, SD 57033	Sec. 15-T142N-R83W
State of North Dakota, for the use and benefit of the State Highway Department	608 East Boulevard Avenue, Bismarck, ND 58505-0700	Sec. 15-T142N-R83W
Larry Doll	3155 49th Avenue, New Salem, ND 58563	Sec. 23-T142N-R83W
Ann Doll	4601 McKenzie Drive SE, Mandan, ND 58554	Sec. 23-T142N-R83W
Larry Doll	3155 49th Avenue, New Salem, ND 58563	Sec. 23-T142N-R83W
Williston Projects, Inc.	3345 Highway 132, Rayville, LA 71269	Sec. 23-T142N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Nick Freidig	17220 Schuch Lane, Stanwood, WA 56201	Sec. 23-T142N-R83W
Leo Freidig	1106 W. 14th St., Willmar, MN no zip code of record56201	Sec. 23-T142N-R83W
Johanna Rambur Jackson	3420 11th Place N., Renton, WA 98056	Sec. 23-T142N-R83W
Murex Petroleum Corporation	515 N. Sam Houston Parkway East, Suite 485, Houston, TX 77060	Sec. 23-T142N-R83W
Alan G. Cypert	6467 Glennox St., Dallas, TX 75214	Sec. 23-T142N-R83W
Missiana L.L.C.	15311 Vantage Parkway West, Suite 201, Houston, TX 77032	Sec. 23-T142N-R83W
Matt Freidig Jr.	2202 E. Rosser, Bismarck, ND 58501	Sec. 23-T142N-R83W
Cynthia C. Fowler, as Trustee of The Cotton 4 Mineral Trust	1411 North Boulevard, Houston, TX 77006	Sec. 23-T142N-R83W
Michael H. Dunn	1128 South 7th Street, Bismarck, ND 58504	Sec. 23-T142N-R83W
James M. Dunn	116 Center Street, Bismarck, ND 58504	Sec. 23-T142N-R83W
Alice R. Dunn Thompson	116 Center Street, Bismarck, ND 58504	Sec. 23-T142N-R83W
Cynthia C. Fowler, as Trustee of The Cotton 6 Mineral Trust	1411 North Boulevard, Houston, TX 77006	Sec. 23-T142N-R83W
George E. Moss Jr. and John K. Moss, as joint tenants	4360 Worth Street, Los Angeles, CA 90063	Sec. 23-T142N-R83W
Alexander F. Rolle and Andrew Rolle, as Trustees of The Andrew Rolle O & G Trust	2105 Adair, San Marino, CA 91108	Sec. 23-T142N-R83W
Henry O. Bergloff	606 North Addison, Villa Park, IL 60181	Sec. 23-T142N-R83W
Raymond A. Bergloff	22712 Brenford Street, Woodland Hills, CA 91364	Sec. 23-T142N-R83W
Cleone I. Fredrickson	Box 9116, Brooks, OR 97305	Sec. 23-T142N-R83W
Laurence S. Bergloff	9900 Oakland Avenue South, Bloomington, MN 55420	Sec. 23-T142N-R83W
Beatrice L. Ottema	9901 Oakland Avenue South, Bloomington, MN 55420	Sec. 23-T142N-R83W
Alfred O. Bergloff	2528 Atlas Drive, Bismarck, ND 58501	Sec. 23-T142N-R83W
Mardi Albers, as purported successor to the Estate of Joyce Albers	P.O. Box 164, Grass Range, MT 59032	Sec. 23-T142N-R83W
Claudette Yantzer, as purported successor to the Estate of Joyce Albers	P.O. Box 180, Killdeer, ND 58640	Sec. 23-T142N-R83W
Daniel Bergloff	1232 W. 450 #46, Clearfield, UT 84015	Sec. 23-T142N-R83W
Norman Berglof	1232 W. 450 #46, Clearfield, UT 84015	Sec. 23-T142N-R83W
Vylo Raye Glasgow	2029 Canyon Drive, Billings, MT 59102	Sec. 23-T142N-R83W
Renee K. Hicks	16690 S.W. Vincent St., Aloha, OR 97007	Sec. 23-T142N-R83W
Constance M. Russell and Robert L. Russell, as Trustees of The Constance M. Russell Trust executed March 15, 1993	6000 NE Livingston Road, Camas, WA 98607	Sec. 23-T142N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Keith H. Albers	2333 Portola Drive #46, Santa Cruz, CA 95062	Sec. 23-T142N-R83W
Roberta L. Herman	20247 Homestead Drive, Oregon City, OR 97045	Sec. 23-T142N-R83W
State of North Dakota	1707 N 9th Street, Bismarck, ND 58501	Sec. 36-T142N-R84W
John M. Haag and Beata Haag	P. O. Box 353, Center ND 58530	Sec. 36-T142N-R84W
Larry J. Doll and Faye Doll	5801 Lake Shore Est., Lot 9, Beulah, ND 58523	Sec. 25-T142N-R83W
Monsadius J. Hatzenbihler Estate, c/o Denise Brorby and Jill Bosch	265 93rd Street SE, Strasburg, ND 58573	Sec. 25-T142N-R83W
Red Crown Royalties, LLC	1490 W Canal Court; Ste. 3000, Littleton, CO 80120	Sec. 25-T142N-R83W
Patrick T. Rooney, Timothy P. Rooney, James Harris Rooney, and L. F. Rooney, III, Co-Trustees of the L. F. Rooney III, Trust created by the Lucy T. Rooney 1992 GST Exempt Family Trusts under Trust Agreement dated August 18, 1992	7 Spring Creek Road, Muskogee, OK 74401	Sec. 25-T142N-R83W
Patrick T. Rooney, Timothy P. Rooney, James Harris Rooney, and L. F. Rooney, III, Co-Trustees of the Patrick T. Rooney Trust created by the Lucy T. Rooney 1992 GST Exempt Family Trusts under Trust Agreement dated August 18, 1992	7 Spring Creek Road, Muskogee, OK 74401	Sec. 25-T142N-R83W
Patrick T. Rooney, Timothy P. Rooney, James Harris Rooney, and L. F. Rooney, III, Co-Trustees of the Timothy P. Rooney Trust created by the Lucy T. Rooney 1992 GST Exempt Family Trusts under Trust Agreement dated August 18, 1992	7 Spring Creek Road, Muskogee, OK 74401	Sec. 25-T142N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Patrick T. Rooney, Timothy P. Rooney, James Harris Rooney, and L. F. Rooney, III, Co-Trustees of the James Harris Rooney Trust created by the Lucy T. Rooney 1992 GST Exempt Family Trusts under Trust Agreement dated August 18, 1992	7 Spring Creek Road, Muskogee, OK 74401	Sec. 25-T142N-R83W
Patrick T. Rooney, Timothy P. Rooney, James Harris Rooney, and L. F. Rooney, III, Co-Trustees of the Lucy Rooney Kapples Trust created by the Lucy T. Rooney 1992 GST Exempt Family Trusts under Trust Agreement dated August 18, 1992	7 Spring Creek Road, Muskogee, OK 74401	Sec. 25-T142N-R83W
Patrick T. Rooney, Timothy P. Rooney, James Harris Rooney, and L. F. Rooney, III, Co-Trustees of the Rebecca Finch Rooney Trust created by the Lucy T. Rooney 1992 GST Exempt Family Trusts under Trust Agreement dated August 18, 1992	7 Spring Creek Road, Muskogee, OK 74401	Sec. 25-T142N-R83W
Eileen Rooney Hewgley, L.L.C.	427 S Boston Avenue; Ste. 304, Tulsa, OK 74103	Sec. 25-T142N-R83W
RLand, L.L.C.	401 S Boston Avenue; Ste. 2400, Tulsa, OK 74103	Sec. 25-T142N-R83W
Osprey Resources, Inc.	P. O. Box 56449, Houston, TX 77256-6449	Sec. 25-T142N-R83W
Mary Michael Genung	885 Live Oak Ridge Road, Austin, TX 78746	Sec. 25-T142N-R83W
Gonzaga University Law Department	1224 E Euclid, Spokane, WA 99207	Sec. 25-T142N-R83W
Frase-Tucker Resources, LLC	P. O. Box 994486, Redding, CA 96099	Sec. 25-T142N-R83W
Tenneco Oil Company	P. O. Box 3119, Englewood, CO 80155 AND 1001 Louisiana, P. O. Box 2511, Houston, TX 77252-2511	Sec. 25-T142N-R83W
John M. Haag and Beata Haag	P. O. Box 353, Center, ND 58530	Sec. 24-T142N-R84W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Patrick T. Rooney, Timothy P. Rooney, James Harris Rooney, and L. F. Rooney, III, Co-Trustees of the L. F. Rooney III, Trust created by the Lucy T. Rooney 1992 GST Exempt Family Trusts under Trust Agreement dated August 18, 1992	7 Spring Creek Road, Muskogee, OK 74401	Sec. 24-T142N-R84W
Patrick T. Rooney, Timothy P. Rooney, James Harris Rooney, and L. F. Rooney, III, Co-Trustees of the Patrick T. Rooney Trust created by the Lucy T. Rooney 1992 GST Exempt Family Trusts under Trust Agreement dated August 18, 1992	7 Spring Creek Road, Muskogee, OK 74401	Sec. 24-T142N-R84W
Patrick T. Rooney, Timothy P. Rooney, James Harris Rooney, and L. F. Rooney, III, Co-Trustees of the Timothy P. Rooney Trust created by the Lucy T. Rooney 1992 GST Exempt Family Trusts under Trust Agreement dated August 18, 1992	7 Spring Creek Road, Muskogee, OK 74401	Sec. 24-T142N-R84W
Patrick T. Rooney, Timothy P. Rooney, James Harris Rooney, and L. F. Rooney, III, Co-Trustees of the James Harris Rooney Trust created by the Lucy T. Rooney 1992 GST Exempt Family Trusts under Trust Agreement dated August 18, 1992	7 Spring Creek Road, Muskogee, OK 74401	Sec. 24-T142N-R84W
Patrick T. Rooney, Timothy P. Rooney, James Harris Rooney, and L. F. Rooney, III, Co-Trustees of the Lucy Rooney Kapples Trust created by the Lucy T. Rooney 1992 GST Exempt Family Trusts under Trust Agreement dated August 18, 1992	7 Spring Creek Road, Muskogee, OK 74401	Sec. 24-T142N-R84W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Patrick T. Rooney, Timothy P. Rooney, James Harris Rooney, and L. F. Rooney, III, Co-Trustees of the Rebecca Finch Rooney Trust created by the Lucy T. Rooney 1992 GST Exempt Family Trusts under Trust Agreement dated August 18, 1992	7 Spring Creek Road, Muskogee, OK 74401	Sec. 24-T142N-R84W
Eileen Rooney Hewgley, L.L.C.	427 S Boston Avenue; Ste. 304, Tulsa, OK 74103	Sec. 24-T142N-R84W
Rland, L.L.C.	401 S Boston Avenue; Ste. 2400, Tulsa, OK 74103	Sec. 24-T142N-R84W
Osprey Resources, Inc.	P. O. Box 56449, Houston, TX 77256-6449	Sec. 24-T142N-R84W
Mary Michael Genung	885 Live Oak Ridge Road, Austin, TX 78746	Sec. 24-T142N-R84W
Gonzaga University Law Department	1224 E Euclid, Spokane, WA 99207	Sec. 24-T142N-R84W
Carlotta B. Tyler	Elk River MN 55330	Sec. 25-T142N-R84W
E. L. Gunberg	No street address, Minneapolis, MN 55111	Sec. 25-T142N-R84W
O. P. Curry	No street address, Minneapolis, MN 55111	Sec. 25-T142N-R84W
P. H. Phillips	5444 Fremont Ave S, Minneapolis, MN 55419-1625	Sec. 25-T142N-R84W
Albert A. Reed	No street address or zip code of record, Minneapolis, MN	Sec. 25-T142N-R84W
Frances R. Kary	1709 Linda Drive, Mandan, ND 58554	Sec. 25-T142N-R84W
Cecelia Hatzenbihler	P. O. Box 283, Center, ND 58530	Sec. 25-T142N-R84W
Elizabeth Hatzenbihler	P. O. Box 325, Center, ND 58530	Sec. 25-T142N-R84W
Joyce Barrick	835 Harrington Street SW, Hutchinson, MN 55350-3013	Sec. 25-T142N-R84W
Richard Himmelspach	8983 Sheridan Lake Road, Rapid City, SD 57702-9064	Sec. 25-T142N-R84W
Gary Himmelspach	4201 Old Red Trail NW, Mandan, ND 58554-1352	Sec. 25-T142N-R84W
Michele Curtis	710 3rd Avenue SE, Jamestown, ND 58401	Sec. 25-T142N-R84W
Robert Himmelspach	6298 Fox Run Drive, Idaho Falls, ID 83402-5876	Sec. 25-T142N-R84W
Mary Nelson	5004 Cornice Drive, Bismarck, ND 58503	Sec. 25-T142N-R84W
Becky Martin	10049 N 27th E, Idaho Falls, ID 83401-6437	Sec. 25-T142N-R84W
Beverly Moon	#4 Manor Lane, Rossville, GA 30741	Sec. 25-T142N-R84W
Jeanette Brown	HC 2, Box 154, Hensler, ND 58530	Sec. 25-T142N-R84W
Joseph Schmidt c/o Kenneth Schmidt	2205 36th Avenue SW, Center, ND 58530	Sec. 25-T142N-R84W
Kenneth J. Schmidt, Personal Representative of the Monica Schmidt Estate	2205 36th Avenue SW, Center, ND 58530	Sec. 25-T142N-R84W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Kenneth J. Schmidt, Trustee of the Monica Schmidt Trust U/W DTD 1/18/2002	2205 36th Avenue SW, Center, ND 58530	Sec. 25-T142N-R84W
Joseph Schmidt	3581 22 Street SW, Center, ND 58530	Sec. 19-T142N-R83W
Kenneth J. Schmidt, Trustee of the Monica Schmidt Trust U/W DTD 1/18/2002	2205 36th Avenue SW, Center, ND 58530	Sec. 19-T142N-R83W
Robert A. Wilbrandt, Executor of Harold M. Tripp Estate	P. O. Box 85, Crystal Lake, IL 60039	Sec. 19-T142N-R83W
Mary S. Tripp	P. O. Box 85, Crystal Lake, IL 60039	Sec. 19-T142N-R83W
Matthias A. Erhardt and Josephine Erhardt, as co-trustees of the Erhardt Family Trust dated June 13, 2006	2121 35th Avenue SW, Center, ND 58530	Sec. 19-T142N-R83W
June T. Nelson	15100 Interlachen Drive, # 212, Silver Springs, MD 20906	Sec. 19-T142N-R83W
Anna I. V. Kiebert	No address of record	Sec. 19-T142N-R83W
William V. Kiebert	No address of record	Sec. 19-T142N-R83W
Mary E. Tripp	No street address or zip of record. USPS.com for zip, Faribault, MN 55021	Sec. 19-T142N-R83W
Joey Nagel	RR1, Box 256, Center, ND 58530	Sec. 1-T141N-R83W
Jerry Nagel	RR1, Box 256, Center, ND 58530	Sec. 1-T141N-R83W
Richard A. Schwalbe and Lila M. Schwalbe, as joint tenants	HC 2, Box 254, Center, ND 58530	Sec. 1-T141N-R83W
Carl Schwalbe	HC 2 Box 258, Center ND 58530	Sec. 1-T141N-R83W
Rolland Schwalbe	HC 2 Box 258, Center ND 58530	Sec. 1-T141N-R83W
Loren Schwalbe	603 3rd Ave. NE, Mandan, ND 58554	Sec. 1-T141N-R83W
Albert Schwalbe	502 3rd Ave. NW, Mandan ND 58554	Sec. 1-T141N-R83W
State of North Dakota, N.D. Dept. of Trust Lands	1707 N 9th St, Bismarck, ND 58501-5523	Sec. 1-T141N-R83W
Richard A. Schwalbe and Lila M. Schwalbe, as joint tenants	HC 2, Box 254, Center, ND 58530	Sec. 12-T141N-R83W
Albert Schwalbe	502 3rd Ave. NW, Mandan, ND 58554	Sec. 12-T141N-R83W
Fred Schwalbe	Center ND 58530	Sec. 12-T141N-R83W
Raynold Schwalbe	Center ND 58530	Sec. 12-T141N-R83W
Walter Schwalbe	Center ND 58530	Sec. 12-T141N-R83W
Julie Hatzenbihler	P.O. Box 325, Center, ND 58530	Sec. 12-T141N-R83W
Rodney J. Hatzenbihler	2660 30th Avenue, Center, ND 58530	Sec. 12-T141N-R83W
Nancy Henke and Dwight Henke, as joint life tenants	P.O. Box 90, Hazen, ND 58545	Sec. 12-T141N-R83W
Melissa Hatlestad	2372 Harmon Lane N, Mandan, ND 58554	Sec. 12-T141N-R83W
Travis Henke	965 Gregory Lane, Mountain Home, ID 83647	Sec. 12-T141N-R83W
Bonnie Schwab	3203 Mink Avenue, Gillette, WY 82716	Sec. 12-T141N-R83W
Peggy Gobar	504 Garden Ave. NW, West Fargo, ND 58078	Sec. 12-T141N-R83W
Annette Hatzenbihler	310 W. Tonk, Gillette, WY 82718	Sec. 12-T141N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Brent Hatzenbihler	310 W. Tonk, Gillette, WY, 82718	Sec. 12-T141N-R83W
Randy Hatzenbihler	P.O. Box 325, Center, ND 58530	Sec. 12-T141N-R83W
State of North Dakota, N.D. Dept. of Trust Lands	1707 N 9th St, Bismarck, ND 58501-5523z	Sec. 12-T141N-R83W
United States of America	No address of record	Sec. 12-T141N-R83W
Reda Renee Clinton and Stephanie A. Clarys, as joint tenants	3135 27th St. SW, Center, ND 58530	Sec. 14-T141N-R83W
Michael P. Hilton	3135 27th St. SW, Center, ND 58530	Sec. 14-T141N-R83W
Oliver County	Oliver County Courthouse, 115 W Main, Center, ND 58530	Sec. 14-T141N-R83W
John Barnhardt	1511 North 21st Street, Bismarck, ND 58501	Sec. 14-T141N-R83W
Gail M. Hilton	3195 27th St., Center, ND 58530	Sec. 14-T141N-R83W
Delmar Hagerott	3170 27th Street, Center, ND, 58530	Sec. 14-T141N-R83W
Arline Orgaard	2935 Manitoba Lane, Bismarck, ND 58501	Sec. 14-T141N-R83W
Delvin Bueligen	709A 3rd Ave. SE, Mandan, ND 58554	Sec. 14-T141N-R83W
Lowell Bueligen	13621 Homestead Lane, Riverton, UT 84065	Sec. 14-T141N-R83W
Rodella Hausauer	1611 Castillian Way, Mundelein, IL 60060	Sec. 14-T141N-R83W
James Orgaard	9589 Brentford Drive, Highlands Ranch, CO 80126	Sec. 14-T141N-R83W
Clifford Orgaard	11839 Forada Beach Road SE, Unit A, Alexandria, MN 56308	Sec. 14-T141N-R83W
Steven Orgaard	2935 Manitoba Lane, Bismarck, ND 58501	Sec. 14-T141N-R83W
Michael Orgaard	3010 27th Street, Center, ND 58530	Sec. 14-T141N-R83W
Dale Barnhardt	3199 27th Street, Center, ND 58530	Sec. 14-T141N-R83W
Alan Schwalbe	3175 27th St., Center, ND 58530	Sec. 14-T141N-R83W
United States of America	No address of record	Sec. 14-T141N-R83W
Jeff Erhardt ad Mary Erhardt, as joint tenants	2161 34th Ave. SW, Center, ND 58530	Sec. 20-T142N-R83W
Yolanda Bittner	3428 Highway 25, Center, ND 58530	Sec. 20-T142N-R83W
"State of North Dakota N.D. Dept. of Trust Lands"	1707 N 9th St, Bismarck, ND 58501-5523	Sec. 20-T142N-R83W
Federal Land Bank of Saint Paul	375 Jackson Street, P.O. Box 64949, St. Pau, MN 55164-0949	Sec. 20-T142N-R83W
General Council of the Assemblies of God	1445 N. Boonville Avenue, Springfield MO 65802-1894	Sec. 20-T142N-R83W
North Dakota District Council of the Assemblies of God	1724 North Grandview Lane, Bismarck ND 58503	Sec. 20-T142N-R83W
Matthias A. Erhardt and Josephine Erhardt, as co-trustees of the Erhardt Family Trust dated June 13, 2006	2121 35th Ave. SW, Center, ND 58530	Sec. 20-T142N-R83W
United States of America	No address of record	Sec. 20-T142N-R83W
Carl Schwalbe	HC 2 Box 258, Center ND 58530	Sec. 26-T142N-R83W
Heirs or Devises of the Estate of Loren Schwalbe, deceased	3520 81st Ave. SE, Unit 15, Jamestown, ND 58401	Sec. 26-T142N-R83W
Rolland Schwalbe	HC 2 Box 258, Center ND 58530	Sec. 26-T142N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Marie Mosbrucker	127 Klein Avenue, Center, ND 58530	Sec. 26-T142N-R83W
Raymond Friedig	523 South Anderson Street, Bismarck, ND 58504	Sec. 26-T142N-R83W
Duane Friedig	1706 East Bowman Avenue, Bismarck, ND 58504	Sec. 26-T142N-R83W
Shirley Hilzendeger	110 Klein Avenue, Center, ND 58530	Sec. 26-T142N-R83W
Sacred Heart Hospice Donatory Corporation	1200 12th Street SW, Austin, MN 55912	Sec. 26-T142N-R83W
John J. Krauth	Dumont MN 56236	Sec. 26-T142N-R83W
Larry Doll	3155 49th Avenue, New Salem, ND 58563	Sec. 26-T142N-R83W
Ann Doll	4601 McKenzie Drive SE, Mandan, ND 58554	Sec. 26-T142N-R83W
T. F. Hodge	1113 Continental Bank Building, Fort Worth, TX No zip code of record	Sec. 26-T142N-R83W
Pierce Exploration & Production Corporation	1133 Bal Harbor Blvd., #1139, Punta Gorda, FL 33950	Sec. 26-T142N-R83W
Marshall & Winston, Inc.	P.O. Box 50880, Midland, TX 79710-0880	Sec. 26-T142N-R83W
State of North Dakota, N.D. Dept. of Trust Lands	1707 N 9th St, Bismarck, ND 58501-5523	Sec. 26-T142N-R83W
Dale Barth	2255 33rd Ave. SW, Center, ND 58530	Sec. 27-T142N-R83W
Kathryn S. Wilson	1941 St. Johns Road, Apt. #34, Seal Beach, CA 90740	Sec. 27-T142N-R83W
Margaret A. Flavin	1240 Fourth Avenue, Los Angeles, CA 90019	Sec. 27-T142N-R83W
Bradley Ferderer, as trustee of the Thomas A. Ferderer Residuary Trust	Heil, ND 58546	Sec. 28-T142N-R83W
Nick Ferderer	Flasher, ND 58535 AND 912 Summit Blvd, Bismarck ND 58504-5277	Sec. 28-T142N-R83W
Harry H. Ferderer	907 Cowl Street, Milton Freewater, OR 97862-1682	Sec. 28-T142N-R83W
John R. Ferderer	115 C Street North Richardton ND 58652	Sec. 28-T142N-R83W
Eleanor Falstad	2495 15th St. NW Coleharbor, ND 58531-9449	Sec. 28-T142N-R83W
Joyce Ervin, as personal representative of the Estate of Marie M. McGill, deceased	2073 Rayshire Street, Thousand Oaks CA 91362-2460	Sec. 28-T142N-R83W
Esther Ferderer, as personal representative of the Estate of Jake H. Ferderer, deceased	No address of record	Sec. 28-T142N-R83W
Dorene Rambur	500 North 17th Street Bismarck ND 58501	Sec. 28-T142N-R83W
Norman D. Bunch	6900 Wedgewood Ct., Black Hawk, SD 57718-9680	Sec. 28-T142N-R83W
Kasper Barth	Center ND 58530	

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Dale Barth	2255 33rd Ave SW, Center, ND 58530	Sec. 28-T142N-R83W
Dusty Backer	PO Box 411, Underwood, ND 58576	Sec. 28-T142N-R83W
United States of America	No address of record	Sec. 28-T142N-R83W
Minnkota Power Cooperative, Inc.	5301 32nd Avenue S., Grand Forks, ND 58208-3200 AND 1822 Mill Road, P. O. Box 13200, Grand Forks, ND 58208-3200	Sec. 29-T142N-R83W
Darlene Voegelé	P. O. Box 45, Stanton, ND 58571	Sec. 29-T142N-R83W
Charles Kuether	3555 28th St., New Salem, ND 58563	Sec. 29-T142N-R83W
Doris Kuether	3555 28th St., New Salem, ND 58563	Sec. 29-T142N-R83W
Wayne Windhorst	P. O. Box 45, Stanton, ND 58571	Sec. 29-T142N-R83W
Spindletop Exploration Company, Inc.	P. O. Box 50787, Midland, TX 79710-0787	Sec. 29-T142N-R83W
Estate of Elizabeth Meader, deceased	116 Dix Ave., Kingsbury, NY 12809	Sec. 29-T142N-R83W
Estate of Mildred Doyle, deceased	6 Tower Street, Red Hook, NY 12571	Sec. 29-T142N-R83W
Shirley A. Kilgour	6 Tower Street, Red Hook, NY 12571	Sec. 29-T142N-R83W
Denis A. Doyle	9 Spencer Drive, Red Hook, NY 12571	Sec. 29-T142N-R83W
J. F. Millard	5100 Aldrich Avenue South, Minneapolis, MN 55419	Sec. 29-T142N-R83W
Benischek Management, L.L.C.	3600 N. Harvey Parkway, Oklahoma City, OK 73118	Sec. 29-T142N-R83W
H. Gordon Eason	203 Chestnut, Battle Creek, MI 49017	Sec. 29-T142N-R83W
Margaret W. Eason	203 Chestnut, Battle Creek, MI 49017	Sec. 29-T142N-R83W
John H. Carton	Wolverine Tower, Battle Creek, MI	Sec. 29-T142N-R83W
Mack K. Lowrey	P. O. Box 393, Lancaster, TX 75146	Sec. 29-T142N-R83W
Red Crown Royalties, LLC	1490 W Canal Court, Suite 3000, Littleton, CO 80120	Sec. 29-T142N-R83W
Frase-Tucker Resources, LLC	P.O. Box 994486, Redding, CA 96099	Sec. 29-T142N-R83W
Minnkota Power Cooperative, Inc.	5301 32nd Avenue S, Grand Forks, ND 58201-3312 AND 1822 Mill Road, P. O. Box 13200, Grand Forks, ND 58208-3200	Sec. 30-T142N-R83W
Darlene Voegelé	P. O. Box 45, Stanton, ND 58571	Sec. 30-T142N-R83W
John M. Haag and Beata Haag, as joint tenants	P. O. Box 353, Center ND 58530	Sec. 30-T142N-R83W
Osprey Resources, Inc.	PO Box 56449, Houston, TX 77256-6449	Sec. 30-T142N-R83W
Mary Michael Genung	885 Live Oak Ridge Road, West Lake Hills, TX 78746	Sec. 30-T142N-R83W
Patrick T. Rooney, Timothy P. Rooney, James Harris Rooney, and L. F. Rooney III, as co-trustees of the L. F. Rooney III Trust	7 Spring Creek Road, Muskogee OK 74401	Sec. 30-T142N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Patrick T. Rooney, Timothy P. Rooney, James Harris Rooney, and L. F. Rooney III, as co-trustees of the Patrick T. Rooney Trust	7 Spring Creek Road, Muskogee OK 74401	Sec. 30-T142N-R83W
Patrick T. Rooney, Timothy P. Rooney, James Harris Rooney, and L. F. Rooney III, as co-trustees of the Timothy P. Rooney Trust	7 Spring Creek Road, Muskogee OK 74401	Sec. 30-T142N-R83W
Patrick T. Rooney, Timothy P. Rooney, James Harris Rooney, and L. F. Rooney III, as co-trustees of the James Harris Rooney Trust	7 Spring Creek Road, Muskogee OK 74401	Sec. 30-T142N-R83W
Patrick T. Rooney, Timothy P. Rooney, James Harris Rooney, and L. F. Rooney III, as co-trustees of the Lucy Rooney Kapples Trust	7 Spring Creek Road, Muskogee OK 74401	Sec. 30-T142N-R83W
Patrick T. Rooney, Timothy P. Rooney, James Harris Rooney, and L. F. Rooney III, as co-trustees of the Rebecca Finch Rooney Trust	7 Spring Creek Road, Muskogee OK 74401	Sec. 30-T142N-R83W
Eileen Rooney Hewgley, L.L.C.	427 South Boston Avenue, Suite 304, Tulsa, OK 74103	Sec. 30-T142N-R83W
RLand, L.L.C.	401 South Boston Avenue, Suite 2400, Tulsa, OK 74103	Sec. 30-T142N-R83W
Gonzaga University Law Dept.	1224 E Euclid, Spokane, WA 99207	Sec. 30-T142N-R83W
Charles Kuether	3555 28th St., New Salem, ND 58563	Sec. 30-T142N-R83W
Doris Kuether	3555 28th St., New Salem, ND 58563	Sec. 30-T142N-R83W
Benischek Management, L.L.C.	3600 N. Harvey Parkway, Oklahoma City, OK 73118	Sec. 30-T142N-R83W
H. Gordon Eason	203 Chestnut, Battle Creek, MI 49017	Sec. 30-T142N-R83W
Margaret W. Eason	203 Chestnut, Battle Creek, MI 49017	Sec. 30-T142N-R83W
John H. Carton	Wolverine Tower, Battle Creek, MI 49017	Sec. 30-T142N-R83W
Mack K. Lowrey	P. O. Box 393, Lancaster, TX 75146	Sec. 30-T142N-R83W
Red Crown Royalties, LLC	1490 W Canal Court, Suite 3000, Littleton, CO 80120	Sec. 30-T142N-R83W
Frase-Tucker Resources, LLC	P.O. Box 994486, Redding, CA 96099	Sec. 30-T142N-R83W
Spindletop Exploration Company, Inc.	P. O. Box 50787, Midland, TX 79710-0787	Sec. 30-T142N-R83W
Estate of Elizabeth Meader, deceased	116 Dix Ave., Kingsbury, NY No zip code of record	Sec. 30-T142N-R83W
Estate of Mildred Doyle, deceased	6 Tower Street, Red Hook, NY 12571	Sec. 30-T142N-R83W
Shirley A. Kilgour	6 Tower Street, Red Hook, NY 12571	Sec. 30-T142N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Denis A. Doyle	9 Spencer Drive, Red Hook, NY 12571	Sec. 30-T142N-R83W
Unknown trustee of the Frederick W. McCoy, Jr. Revocable Trust	PO Box 11215, St. Louis, MO 63105	Sec. 30-T142N-R83W
Hymen Cohen and Janis M. Cohen, as joint tenants	7301 Shaftesbury, University City, MO 63130	Sec. 30-T142N-R83W
Martha Buchheister	1748 Fremont Court, Ft. Collins, CO 80526	Sec. 30-T142N-R83W
DGHJLW Holdings, LLC	P.O. Box 33, Cleveland, NM 87715-0033	Sec. 30-T142N-R83W
Groundswell 45, LLC	P.O. Box 121, Kiowa, CO 80117	Sec. 30-T142N-R83W
AWerdel Minerals, LLC	1419 17th Street, Greeley, CO 80631	Sec. 30-T142N-R83W
J. Byron Werdel Resources, LLC	1419 17th Street, Greeley, CO 80631	Sec. 30-T142N-R83W
Shari R. Weber, as trustee of the Shari R. Weber Trust dated August 10, 2008	107 W. Cedar, P O Box 137, Robinson, IL 62454	Sec. 30-T142N-R83W
Betty Eileen Ferrel	3740 Pinebrook Circle, #107, Bradenton, FL 34209	Sec. 30-T142N-R83W
Rikkie P. Doyle	3740 Pinebrook Circle, #207, Bradenton, FL 34209	Sec. 30-T142N-R83W
Marcy P. Stacy	5619 Open Gate Court, Cincinnati, OH 45247	Sec. 30-T142N-R83W
Guy M. Simmons and Ruby P. Simmons, as joint tenants	820 North Cross St., Robinson, IL 62454	Sec. 30-T142N-R83W
Thomas E. Eaton, Sr.	7817 North 1150th Street, Newton, IL 62448	Sec. 30-T142N-R83W
Jacqueline R. Blakley	3207 Florence Drive, Champaign, IL, 61822-8011	Sec. 30-T142N-R83W
Lee. R. Martin	1602 South Lamar Street, Lakewood, CO 80226	Sec. 30-T142N-R83W
Kent Littlejohn and Brenda Littlejohn, as joint tenants	10777 N. Friendship Road, Casey, IL 62420	Sec. 30-T142N-R83W
O. E. Benefiel and Isabel Benefiel, as joint tenants	No street address of record, Newton, IL 62448	Sec. 30-T142N-R83W
Jerome Maginn and Mary Maginn, as joint tenants	Route #3, Newton, IL 62448	Sec. 30-T142N-R83W
Timothy J. Pulliam, as Trustee of the Timothy J. Pulliam Family Legacy Trust dated December 14, 2017	27701 Sycamore Creek Drive, Valencia, CA 91354	Sec. 30-T142N-R83W
Alonzo Walden and Buerryl Walden, as joint tenants	No street address of record, Hidalgo, IL No zip code of record	Sec. 30-T142N-R83W
Donald L. Long and Ledora M. Long, as joint tenants	R. R. 3, Newton, IL 62448	Sec. 30-T142N-R83W
Arnold L. Colpitts and Esther M. Colpitts, as joint tenants	No street address of record, Newton, IL No zip code of record	Sec. 30-T142N-R83W
Irma J. Goeckner, as Trustee of the Goeckner Living Trust dated January 24, 2011	7202 Torrington Way, Springfield, IL 62711	Sec. 30-T142N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Alice Marlene Heaton	863 County Road 500 East, Toledo, IL 62468	Sec. 30-T142N-R83W
Todd David Clark	3301 Avondale Avenue, Knoxville, TN 37917	Sec. 30-T142N-R83W
David Deatherage and Myrtle Deatherage, as joint tenants	No street address of record, Oblong, IL 62449	Sec. 30-T142N-R83W
Estate of Belva L. Dalrymple, deceased	8929 State Route 555, Cutler OH 45724-5167	Sec. 30-T142N-R83W
Robert Lynn Dalrymple and Elizabeth J. Feuerstein, as joint tenants	5 West Fairview Street, Arlington Heights, IL 60005-2551	Sec. 30-T142N-R83W
Barbara Breen, as PR of the Estate of William Wallace Dalrymple, deceased	4 Stuart on Oxford, Rolling Meadows, IL 60008	Sec. 30-T142N-R83W
Kay Kirkpatrick	430 S. Elmwood, Oak Park, IL 60302	Sec. 30-T142N-R83W
Karen Quinn	518 S. Euclid, Oak Park, IL 60304	Sec. 30-T142N-R83W
Kathy Simandl	R.R. #2, Box 210, Menomonie, WI 54751	Sec. 30-T142N-R83W
George G. Vaught, Jr.	P.O. Box 13557, Denver, CO 80201-3557	Sec. 30-T142N-R83W
Paul L. McCulliss	P.O. Box 3248, Littleton, CO 80161-3248	Sec. 30-T142N-R83W
Glengarry Oil Company	PO Box 267, Lima, OH 45802	Sec. 30-T142N-R83W
Stewart J. Schutte	6592 N. 1075th Street, Robinson, IL 62454	Sec. 30-T142N-R83W
Tyler R. Tedford	10250 Wicklow Court, Fishers, IN 46040	Sec. 30-T142N-R83W
Kent A. Tedford	3823 N. Ashland Avenue, #203, Chicago, IL 60613	Sec. 30-T142N-R83W
Charles Sanders	301 North Wolfenberger Street, #1, Sullivan IN 47882-7211	Sec. 30-T142N-R83W
Thomas L. Frichtl and Elizabeth Frichtl, as joint tenants	11681 North 1300th Street, Newton IL 62448-3622	Sec. 30-T142N-R83W
Frank G. Mefford, Emogene Mefford, and Cheryl A. Mefford, as joint tenants	Rt. 1, Palestine, IL 62451	Sec. 30-T142N-R83W
James D. Stout, as trustee of the Carl H. Zwermann Trust	PO Box 714, Robinson IL 62454	Sec. 30-T142N-R83W
United States of America	No address of record	Sec. 30-T142N-R83W
Carl Schwalbe	HC 2 Box 258, Center ND 58530	Sec. 35-T142N-R83W
Loren Schwalbe	603 3rd Ave. NE, Mandan ND 58554	Sec. 35-T142N-R83W
Rolland Schwalbe	HC 2 Box 258, Center ND 58530	Sec. 35-T142N-R83W
T. F. Hodge	1113 Continental Bank Building, Fort Worth, TX No zip code of record	Sec. 35-T142N-R83W
Pierce Exploration & Production Corporation	1133 Bal Harbor Blvd., #1139, Punta Gorda, FL 33950	Sec. 35-T142N-R83W
Marshall & Winston, Inc.	P.O. Box 50880 Midland, TX 79710-0880	Sec. 35-T142N-R83W
State of North Dakota, N.D. Dept. of Trust Lands	1707 N 9th St, Bismarck, ND 58501-5523	Sec. 36-T142N-R83W
Michelle Marie Ternes	3721 W Regent Drive, Bismarck, ND 58504	Sec. 35-T142NR84W
Michael P. Dresser	3731 24th Street SW, Center, ND 58530	Sec. 35-T142NR84W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Linda L. Ash	411B 32nd Avenue NW, Underwood, ND 58576	Sec. 35-T142NR84W
Thomas Dresser, Sr.	HC 2, Box 218", Center, ND 58530	Sec. 35-T142NR84W
USA - Dept. of Interior, Bureau of Land Management	1245 N 29th Street, Billings, MT 59101-0122	Sec. 34-T142N-R84W
Larry Bernard Dresser and Mary Dresser	RR 1, Box 80A", Washburn, ND 58577	Sec. 34-T142N-R84W
Thomas Dresser, Jr.	609 N Almon, #2028, Moscow, ID 83843	Sec. 34-T142N-R84W
Tammy L. Dresser	4810 16th Avenue SW, Apt. #206, Fargo, ND 58103	Sec. 34-T142N-R84W
Laura Ann Dresser	4810 Highway 7, Apt. #102, St. Louis Park, MN 55416	Sec. 34-T142N-R84W
Paul Ash	HC 1, Box 34", Underwood, ND 58576	Sec. 34-T142N-R84W
Dean Ash	HC 1, Box 34", Underwood, ND 58576	Sec. 34-T142N-R84W
Theresa Ash	HC 1, Box 34, Underwood, ND 58576	Sec. 34-T142N-R84W
Dale Barth	2255 33rd Ave. SW, Center, ND 58530	Sec. 16-T142NR83W
State of North Dakota		Sec. 16-T142NR83W
Luella C. Isaak	3347 Hwy 25, Center, ND 58530	Sec. 16-T142NR83W
Burton Isaak	3345 Hwy 25, Center, ND 58530	Sec. 16-T142NR83W
Bruce Isaak	1819 Xavier Street, Bismarck, ND 58501	Sec. 16-T142NR83W
Byron Isaak	2132 Terra Ridge Drive, Highlands Ranch, CO 80126	Sec. 16-T142NR83W
Brenda Kitzan	3313 Hwy 25, Center, ND 58530	Sec. 16-T142NR83W
Yolanda Bittner	3428 Highway 25, Center, ND 58530	Sec. 17-T142N-R83W
The State of North Dakota	1707 N 9th Street, Bismarck, ND 58501	Sec. 17-T142N-R83W
United States of America	No address of record	Sec. 12-T141N-R84W
Jolene Berger	3004 Manchester Street, Bismarck, ND 58504	Sec. 12-T141N-R84W
Brian Dresser	2574 37th Avenue SW, Center, ND 58530	Sec. 12-T141N-R84W
Frances Fuchs	2475 37th Avenue NW, Center, ND 58530	Sec. 12-T141N-R84W
Rosalie A. Dingus	400 Augsburg Avenue, Bismarck, ND 58504	Sec. 12-T141N-R84W
Mark R. Fuchs	18671 Fairweather, Canyon Country, CA 91351	Sec. 12-T141N-R84W
Jack B. Fuchs	15409 Rhododendron Drive, Canyon Country, CA 91351	Sec. 12-T141N-R84W
Yvonne Schmidt	3611 42nd Street NW, Mandan, ND 58554	Sec. 12-T141N-R84W
Terrence Schmidt	515 Nottingham Drive, Bismarck, ND 58504	Sec. 12-T141N-R84W
Randall Schmidt	4817 Roughrider Circle, Mandan, ND 58554	Sec. 12-T141N-R84W
Raymond Schmidt, Jr.	5735 Highland Road, Mandan, ND 58554	Sec. 12-T141N-R84W
Marsha Strecker	P. O. Box 105, South Heart, ND 58655 AND 203 S Prairie Lane, Mandan, ND 58554	Sec. 12-T141N-R84W
JoAnne Snow	329 Bedford Boulevard, Bismarck, ND 58504 AND 902 S Woodland Drive, Mandan, ND 58554	Sec. 12-T141N-R84W
Jeffrey Schmidt	3611 42nd Street NW, Mandan, ND 58554	Sec. 12-T141N-R84W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Patrick T. Rooney, Timothy P. Rooney, James Harris Rooney, and L. F. Rooney, III, Co-Trustees of the L. F. Rooney III, Trust created by the Lucy T. Rooney 1992 GST Exempt Family Trusts under Trust Agreement dated August 18, 1992	7 Spring Creek Road, Muskogee, OK 74401	Sec. 12-T141N-R84W
Patrick T. Rooney, Timothy P. Rooney, James Harris Rooney, and L. F. Rooney, III, Co-Trustees of the Patrick T. Rooney Trust created by the Lucy T. Rooney 1992 GST Exempt Family Trusts under Trust Agreement dated August 18, 1992	7 Spring Creek Road, Muskogee, OK 74401	Sec. 12-T141N-R84W
Patrick T. Rooney, Timothy P. Rooney, James Harris Rooney, and L. F. Rooney, III, Co-Trustees of the Timothy P. Rooney Trust created by the Lucy T. Rooney 1992 GST Exempt Family Trusts under Trust Agreement dated August 18, 1992	7 Spring Creek Road, Muskogee, OK 74401	Sec. 12-T141N-R84W
Patrick T. Rooney, Timothy P. Rooney, James Harris Rooney, and L. F. Rooney, III, Co-Trustees of the James Harris Rooney Trust created by the Lucy T. Rooney 1992 GST Exempt Family Trusts under Trust Agreement dated August 18, 1992	7 Spring Creek Road, Muskogee, OK 74401	Sec. 12-T141N-R84W
Patrick T. Rooney, Timothy P. Rooney, James Harris Rooney, and L. F. Rooney, III, Co-Trustees of the Lucy Rooney Kapples Trust created by the Lucy T. Rooney 1992 GST Exempt Family Trusts under Trust Agreement dated August 18, 1992	7 Spring Creek Road, Muskogee, OK 74401	Sec. 12-T141N-R84W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Patrick T. Rooney, Timothy P. Rooney, James Harris Rooney, and L. F. Rooney, III, Co-Trustees of the Rebecca Finch Rooney Trust created by the Lucy T. Rooney 1992 GST Exempt Family Trusts under Trust Agreement dated August 18, 1992	7 Spring Creek Road, Muskogee, OK 74401	Sec. 12-T141N-R84W
Eileen Rooney Hewgley, L.L.C.	401 S Boston Avenue; Ste. 2400, Tulsa, OK 74103	Sec. 12-T141N-R84W
RLand, L.L.C.	P. O. Box 56449, Houston, TX 77256-6449	Sec. 12-T141N-R84W
Osprey Resources, Inc.	885 Live Oak Ridge Road, Austin, TX 78746	Sec. 12-T141N-R84W
Mary Michael Genung	885 Live Oak Ridge Road, Austin, TX 78746	Sec. 12-T141N-R84W
Gonzaga University Law Department	1224 E Euclid, Spokane, WA 99207	Sec. 12-T141N-R84W
J. C. Miller	508 Beacon Building, Tulsa, OK 74103	Sec. 12-T141N-R84W
Ralph M. Fahrenwald and Edna M. Fahrenwald	3737 E 45th Street, Tulsa, OK 74135	Sec. 12-T141N-R84W
Noah W. Millsap and Nell Rose Millsap	1927 E 33rd Place, Tulsa, OK 74105	Sec. 12-T141N-R84W
W. A. Dean and Fonda G. Dean	1316 E 35th Place, Tulsa, OK 74105	Sec. 12-T141N-R84W
Regina Husfloen	240 Bridge Avenue, Center, ND 58530	Sec. 12-T141N-R84W
Judith McNulty	P. O. Box 1173, Center, ND 58530	Sec. 12-T141N-R84W
Gary Hagel	3453 Thunderbird Lane, Bismarck, ND 58503	Sec. 12-T141N-R84W
Scott Hagel	275 Poplar Drive , Shoreview, MN 55126	Sec. 12-T141N-R84W
Dennis Hagel	506 W Main, Hazen, ND 58545	Sec. 12-T141N-R84W
Jay Kautzman	2024 N 5th Street, Bismarck, ND 58501	Sec. 12-T141N-R84W
Julie Fry	1853 N 23rd Street, Bismarck, ND 58501	Sec. 12-T141N-R84W
Janet Anderson	15537 E Radcliffe Place, Aurora, CO 80015	Sec. 12-T141N-R84W
Jeanine Marcolina	3938 E San Pedro, Gilbert, AZ 85234	Sec. 12-T141N-R84W
John Kautzman	P. O. Box 82, Center, ND 58530	Sec. 12-T141N-R84W
Jeff Erhardt and Mary Erhardt, as joint tenants	2161 34th Ave. SW, Center, ND 58530	Sec. 21-T142N-R83W
Keith Erhardt	P.O. Box 1846, Center, ND 58530	Sec. 21-T142N-R83W
Keith Erhardt and Kelly Jo Erhardt, as joint tenants	P.O. Box 1846, Center, ND 58530	Sec. 21-T142N-R83W
Melvin Schoepp and Caroline Schoepp, as joint tenants	2023 Northridge Drive, Bismarck, ND 58503	Sec. 21-T142N-R83W
State of North Dakota	1707 N 9th St, Bismarck, ND 58501-5523	Sec. 21-T142N-R83W
AgriBank, FCB	375 Jackson Street, P.O. Box 64949, St. Paul, MN 55164-0949	Sec. 21-T142N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Sacred Heart Hospice Donatory Corporation (as apparent successor to Robert Dunn)	1200 12th Street SW, Austin, MN 55912	Sec. 21-T142N-R83W
Richard E. Armentrout and Margaret Ann Armentrout, as joint tenants	255 Lynn Ave., Satellite Beach, FL 32937	Sec. 21-T142N-R83W
Burtis B. Conyne	No street address of record, Bismarck ND, No zip code of record	Sec. 21-T142N-R83W
Mary Dunn Lynch	No street address of record Austin, MN 55912	Sec. 21-T142N-R83W
Margaret E. Hagerott	No street address of record, Mandan ND 58554	Sec. 21-T142N-R83W
Michael H. Dunn	1128 South 7th Street, Bismarck, ND 58504	Sec. 21-T142N-R83W
James M. Dunn	116 Center Street, Bismarck, ND 58504	Sec. 21-T142N-R83W
Alice R. Dunn Thompson	116 Center Street, Bismarck, ND 58504	Sec. 21-T142N-R83W
Red Crown Royalties, LLC	1490 W Canal Court, Suite 3000, Littleton, CO 80120	Sec. 21-T142N-R83W
Frase-Tucker Resources, LLC	P.O. Box 994486, Redding, CA 96099	Sec. 21-T142N-R83W
United States of America	No address of record	Sec. 11-T141N-R84W
State of North Dakota, Department of Trust Lands	1707 N 9th Street, Bismarck, ND 58501-5523	Sec. 11-T141N-R84W
Lee Dresser	P. O. Box 683, Riverdale, ND 58565	Sec. 11-T141N-R84W
David O. Berger and Debra A. Berger, as joint tenants	2531 37th Avenue SW, Center, ND 58530	Sec. 11-T141N-R84W
Great Northern Properties LP	1101 N 27th Street; Suite 201, Billings, MT 59101 AND 1658 Cole Boulevard, Building #6, Suite 2, Golden, CO 80401	Sec. 11-T141N-R84W
Meridian Land & Mineral Company	5613 DTC Parkway; Suite 1100, Englewood, CO 80111 AND 2919 Allen Parkway, Houston, TX 77019-2142	Sec. 11-T141N-R84W
Yvonne Schmidt	3611 42nd Street NW, Mandan, ND 58554	Sec. 11-T141N-R84W
Terrence Schmidt	515 Nottingham Drive, Bismarck, ND 58504	Sec. 11-T141N-R84W
Randall Schmidt	4817 Roughrider Circle, Mandan, ND 58554	Sec. 11-T141N-R84W
Raymond Schmidt, Jr.	5735 Highland Road, Mandan, ND 58554	Sec. 11-T141N-R84W
Marsha Strecker	P. O. Box 105, South Heart, ND 58655 AND 203 S Prairie Lane, Mandan, ND 58554	Sec. 11-T141N-R84W
JoAnne Snow	329 Bedford Boulevard, Bismarck, ND 58504 AND 902 S Woodland Drive, Mandan, ND 58554	Sec. 11-T141N-R84W
Jeffrey Schmidt	3611 42nd Street NW, Mandan, ND 58554	Sec. 11-T141N-R84W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Matt Berger and Rose Berger c/o David O. Berger"	2531 37th Avenue SW, Center, ND 58530	Sec. 11-T141N-R84W
Margaret Schmidt	1305 2nd Street NW, Mandan, ND 58554	Sec. 11-T141N-R84W
Raymond Schmidt Estate c/o Margaret Schmidt	1305 2nd Street NW, Mandan, ND 58554	Sec. 11-T141N-R84W
Melvin Schoepp	3020 Daytona Drive, Bismarck, ND 58503	Sec. 22-T142N-R83W
Caroline K. Schoepp	3020 Daytona Drive, Bismarck, ND 58503	Sec. 22-T142N-R83W
Larry Doll	3155 49th Ave., New Salem, ND 58563	Sec. 22-T142N-R83W
Grealing Starck and Deborah Stark, as joint tenants	3244 Highway 25, Center, ND 58530	Sec. 22-T142N-R83W
Marie Mosbrucker	127 Klein Avenue, Center, ND 58530	Sec. 22-T142N-R83W
Raymond Friedig	523 South Anderson Street, Bismarck, ND 58504	Sec. 22-T142N-R83W
Duane Friedig	1706 East Bowman Avenue, Bismarck, ND 58504	Sec. 22-T142N-R83W
Shirley Hilzendeger	110 Klein Avenue, Center, ND 58530	Sec. 22-T142N-R83W
Ann Doll	4601 McKenzie Drive SE, Mandan, ND 58554	Sec. 22-T142N-R83W
Richard C. Baulder, as Personal Representative of the Estate of Winifred M. Dunn, deceased	No street address of record, Austin, MN 55912	Sec. 22-T142N-R83W
Ryan Oil Company, LLC	P.O. Box 507, Evansville, IN 47703	Sec. 22-T142N-R83W
Derby Energy, L.L.C.	6420 Richmond Avenue, Suite 210, Houston, TX 77057	Sec. 22-T142N-R83W
State of North Dakota	1707 N 9th St, Bismarck, ND 58501-5523	Sec. 22-T142N-R83W
United States of America	No address of record	Sec. 22-T142N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
BNI Coal Ltd.	1637 Burnt Boat Drive, Bismarck, ND 58502-0897 AND P. O. Box 897, Bismarck, ND 58502 AND 16400 Saybrook Lane, Huntington, CA 92649	Sec. 3-T141N-R83W Sec. 5-T141N-R83W Sec. 6-T141N-R83W Sec. 7-T141N-R83W Sec. 8-T141N-R83W Sec. 9-T141N-R83W Sec. 15-T141N-R83W Sec. 16-T141N-R83W Sec. 17-T141N-R83W Sec. 18-T141N-R83W Sec. 19-T141N-R83W Sec. 20-T141N-R83W Sec. 21-T141N-R83W Sec. 22-T141N-R83W Sec. 28-T141N-R83W Sec. 29-T141N-R83W Sec. 3-T141N-R84W Sec. 10-T141N-R84W Sec. 11-T141N-R84W Sec. 12-T141N-R84W Sec. 13-T141N-R84W Sec. 14-T141N-R84W Sec. 24-T141N-R84W Sec. 15-T142N-R83W Sec. 16-T142N-R83W Sec. 17-T142N-R83W Sec. 19-T142N-R83W Sec. 20-T142N-R83W Sec. 21-T142N-R83W Sec. 22-T142N-R83W Sec. 28-T142N-R83W Sec. 29-T142N-R83W Sec. 30-T142N-R83W Sec. 32-T142N-R83W Sec. 33-T142N-R83W Sec. 25-T142N-R84W Sec. 34-T142N-R84W Sec. 35-T142N-R84W Sec. 36-T142N-R84W
BNI Coal, Ltd. (f/k/a Baukol-Noonan, Inc.)	1637 Burnt Boat Drive, Bismarck, ND 58502	Sec. 32-T142N-R83W
L. D. Jenkins c/o Gentry, LLC	4216 N Portland; Suite 104, Oklahoma City, OK 73112	Sec. 20-T141N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Willow Point Corporation c/o Gentry, LLC	4216 N Portland; Suite 104, Oklahoma City, OK 73112	Sec. 20-T141N-R83W
Gentry, LLC	4216 N Portland; Suite 104, Oklahoma City, OK 73112	Sec. 20-T141N-R83W
Otter Creek Mining Company, L.L.C.	2000 Schafer Street, Suite D, Bismarck, ND 58501	Sec. 15-T142N-R83W
Consolidation Coal Company	1800 Washington Road, Pittsburgh, PA 15241 AND Koppers Building, 436 7th Avenue, Pittsburgh, PA 15219	Sec. 11-T141N-R84W
William Coal Corporation	801 Wilmington Trust Building Wilmington, DE 19801	Sec. 11-T141N-R84W

2.0 GEOLOGIC EXHIBITS

2.1 Overview of Project Area Geology

The proposed Tundra SGS carbon dioxide (CO₂) storage project will be situated near the Milton R. Young Station (MRYS) southeast of Center, North Dakota (Figures 2-1 and 2-2). This project site is on the eastern flank of the Williston Basin.

Overall, the stratigraphy of the Williston Basin has been well-studied, particularly the numerous oil-bearing formations. Through research conducted via the Plains CO₂ Reduction (PCOR) Partnership, the Williston Basin has been identified as an excellent candidate for long-term CO₂ storage due, in part, to the thick sequence of clastic and carbonate sedimentary rocks and the basin's subtle structural character and tectonic stability (Peck, 2014; Glazewski, 2015).

The target CO₂ storage reservoirs addressed in this CO₂ storage facility permit for Tundra SGS are the predominantly sandstone horizons of the Black Island and Deadwood Formations, lying about 9,280 ft below MRYS. Shales of the Icebox Formation conformably overly the Black Island and serve as the primary confining zone (Figure 2-3). The continuous shales of the Deadwood Formation B member serve as the lower confining zone (Figure 2-3). Together, the Icebox, Black Island, and Deadwood Formations comprise this CO₂ storage complex for Tundra SGS (Table 2-1).

In addition to the Icebox Formation, there is 570 ft of impermeable rock formations between the Black Island Formation and the next overlying porous zone, the Red River Formation. An additional 7400 ft of section including several thousands of feet of impermeable intervals separate the Black Island and the lowest underground source of drinking water (USDW), the Fox Hills Formation (Figure 2-3).

2.2 Data and Information Sources

Several sets of data were used to characterize the injection and confining zones to establish their suitability for storage and containment of injected CO₂. Data sets used for characterization included both existing data (sources and uses are discussed within Section 2.2.1) and site-specific data acquired by the applicant to characterize the storage complex.

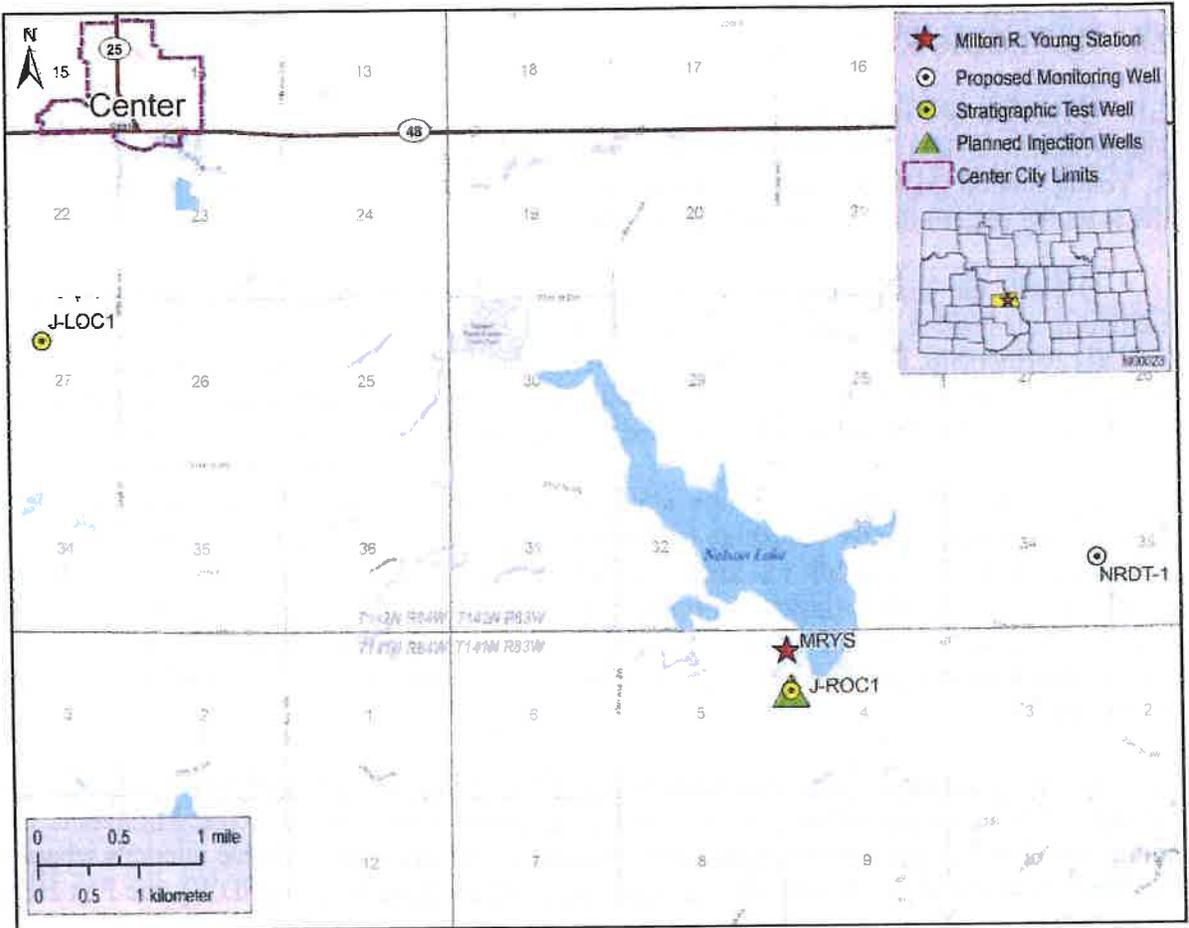


Figure 2-1. Topographic map of the Tundra SGS area showing well locations and MRYS.

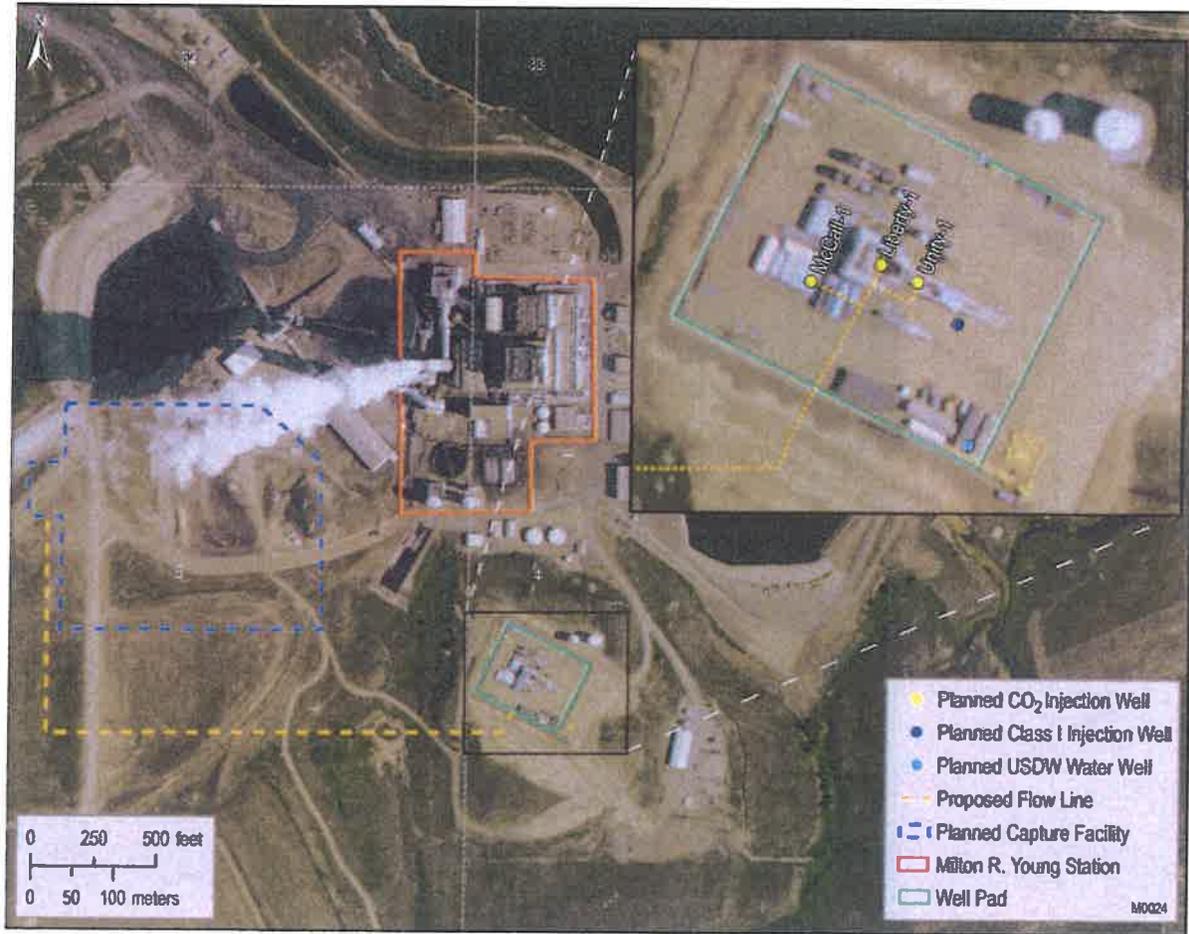


Figure 2-2. Topographic map of the proposed CO₂ flowlines and well pad layout.

2.2.1 Existing Data

Existing data used to characterize the geology beneath the Tundra SGS site included publicly available well logs and formation top depths acquired from the North Dakota Industrial Commission's (NDIC's) online database. Well log data and interpreted formation top depths were acquired for 13 wellbores within a 56-mi radius of the proposed storage site (Figure 2-4). These data were used to characterize the depth, thickness, and extent of the subsurface geologic formations. Existing laboratory measurements from Deadwood Formation core samples were available from one well: J-LOC1 (NDIC File No. 37380). These measurements were compiled and used to establish relationships between measured petrophysical characteristics and estimates from well log data. Two 3D surveys totaling 18.5 mi² (6.5-mi² west 3D and 12-mi² east 3D), encompassing the J-LOC1 and J-ROC1 wellsites, were examined to understand the heterogeneity and geologic structure of the Black Island and Deadwood Formations.

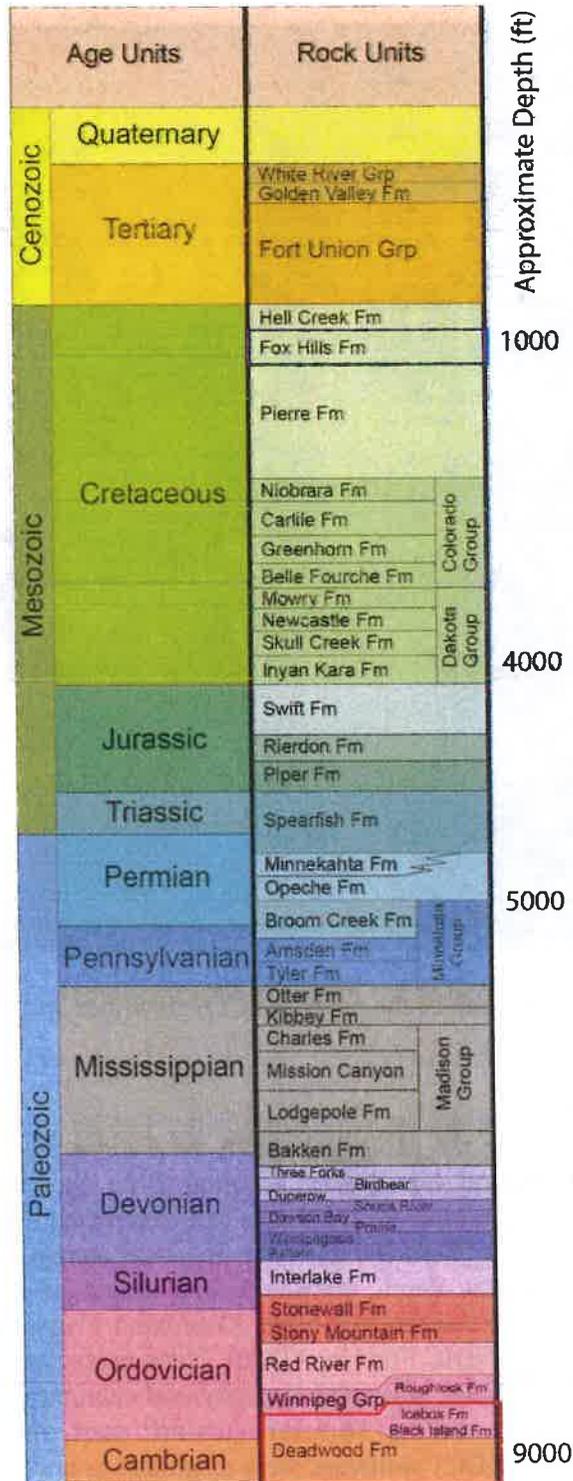


Figure 2-3. Stratigraphic column identifying the storage reservoir, confining zones, and lowest USDW addressed in this permit application for Tundra SGS.

Table 2-1. Formations Comprising the Tundra SGS CO₂ Storage Complex

Storage Complex	Formation	Purpose	Average Thickness	Average Depth	Lithology
			at Tundra SGS Site, ft	Tundra SGS Site, ft TVD	
	Icebox	Upper confining zone	118 (58 to 176)	9,308	Shale
	Black Island and Deadwood E member	Storage reservoir (i.e., injection zone)	118 (35 to 202)	9,427	Sandstone, shale, dolostone, limestone
	Deadwood C member sand	Storage reservoir (i.e., injection zone)	64 (40 to 88)	9,773	Sandstone
	Deadwood B member shale	Lower confining zone	34 (20 to 49)	9,791	Shale

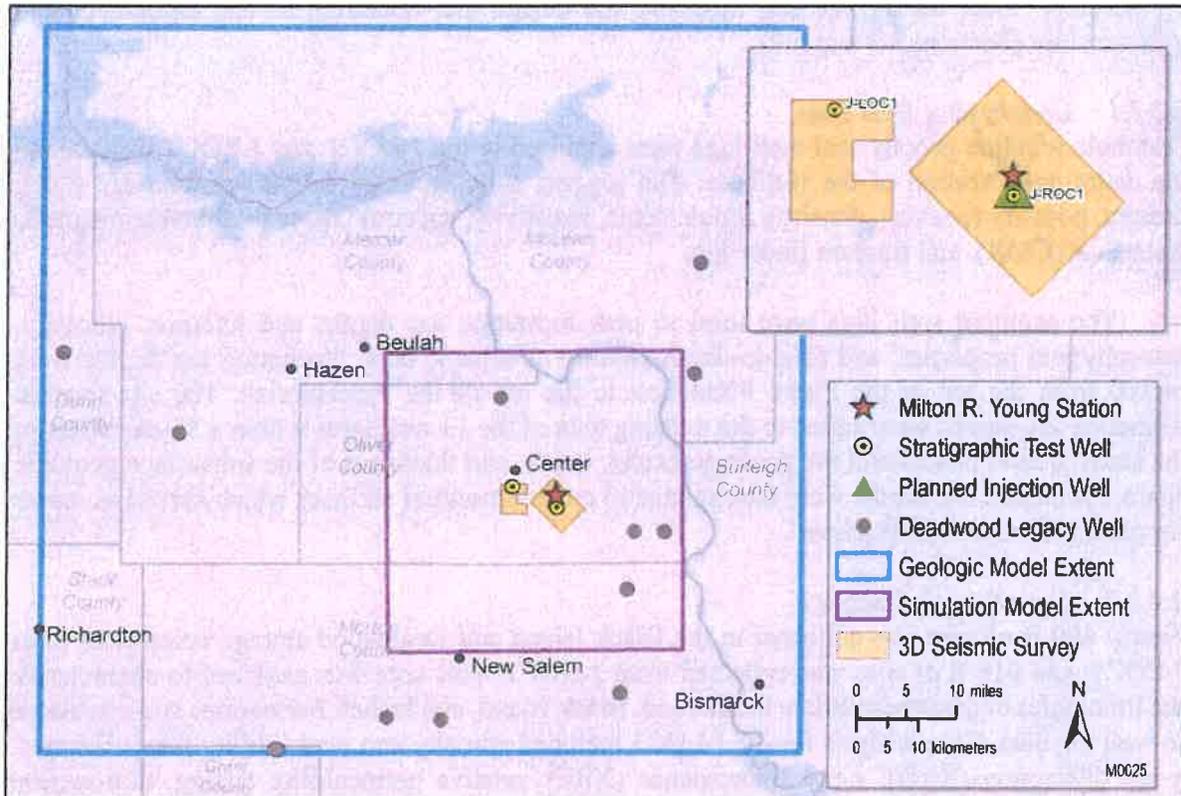


Figure 2-4. Map showing the extent of the regional geologic model, distribution of well control points, and extent of the simulation model. The wells shown penetrate the storage reservoir and the upper and lower confining zones.

2.2.2 Site-Specific Data

Site-specific efforts to characterize the proposed storage complex generated multiple data sets, including geophysical well logs, petrophysical data, fluid analyses, and 3D seismic data. In 2020, the J-LOC1 and J-ROC1 wells were drilled specifically to gather subsurface geologic data to support the development of a CO₂ storage facility permit. J-LOC1 was drilled to a depth of 10,477 ft, and J-ROC1 was drilled to a depth of 9,893 ft. A downhole sampling and measurement program focused on the proposed storage complex (i.e., the Black Island and Deadwood Formations [Figure 2-5a and 2-5b]). Additional characterization efforts focused on the Inyan Kara Formation interval and Broom Creek Formation interval as potential CO₂ storage reservoirs.

Site-specific data were used to assess the suitability of the storage complex for safe and permanent storage of CO₂ and were inputs for geologic model construction (Appendix A), numerical simulations of CO₂ injection (Appendix A), geochemical simulation (Sections 2.3.3 and 2.4.1.2), and geomechanical analysis (Section 2.4.4). The improved understanding of the subsurface provided by the site-specific data directly informed the selection of monitoring technologies, development of the timing and frequency of monitoring data collection, and interpretation of the monitoring data with respect to potential subsurface risks (Section 4.1). Furthermore, these data guide and influence the design and operation of site equipment and infrastructure (Sections 4.5 and 5.0).

2.2.2.1 Geophysical Well Logs

Openhole wireline geophysical well logs were acquired in the J-LOC1 and J-ROC1 wells along the entire open section of the wellbore. The logging suite included caliper, gamma ray (GR), density, porosity (neutron, density), dipole sonic, resistivity, spectral GR, a combinable magnetic resonance (CMR), and fracture finder log.

The acquired well logs were used to pick formation top depths and interpret lithology, petrophysical properties, and time-to-depth shifting of seismic data. Formation top depths were picked from the top of the Pierre Formation to the top of the Precambrian. The site-specific formation top depths were added to the existing data of the 13 wellbores within a 56-mi radius of the study area to understand the geologic extent, depth, and thickness of the subsurface geologic strata. Formation top depths were interpolated to create structural surfaces which served as inputs for geologic model construction.

2.2.2.2 Core Sample Analyses

Nearly 600 ft of core was collected in the Black Island and Deadwood storage complexes from J-LOC1, and 616 ft of core was collected from J-ROC1. This core was analyzed to characterize the lithologies of the Precambrian, Deadwood, Black Island, and Icebox Formations and correlated to well log data. Core analysis for the J-LOC1 included porosity and permeability measurements, x-ray diffraction (XRD), x-ray fluorescence (XRF), relative permeability testing, thin-section analysis, capillary entry pressure measurements, and triaxial geomechanics testing. The results were used to inform geologic modeling, predictive simulation inputs and assumptions, geochemical modeling, and geomechanical modeling.

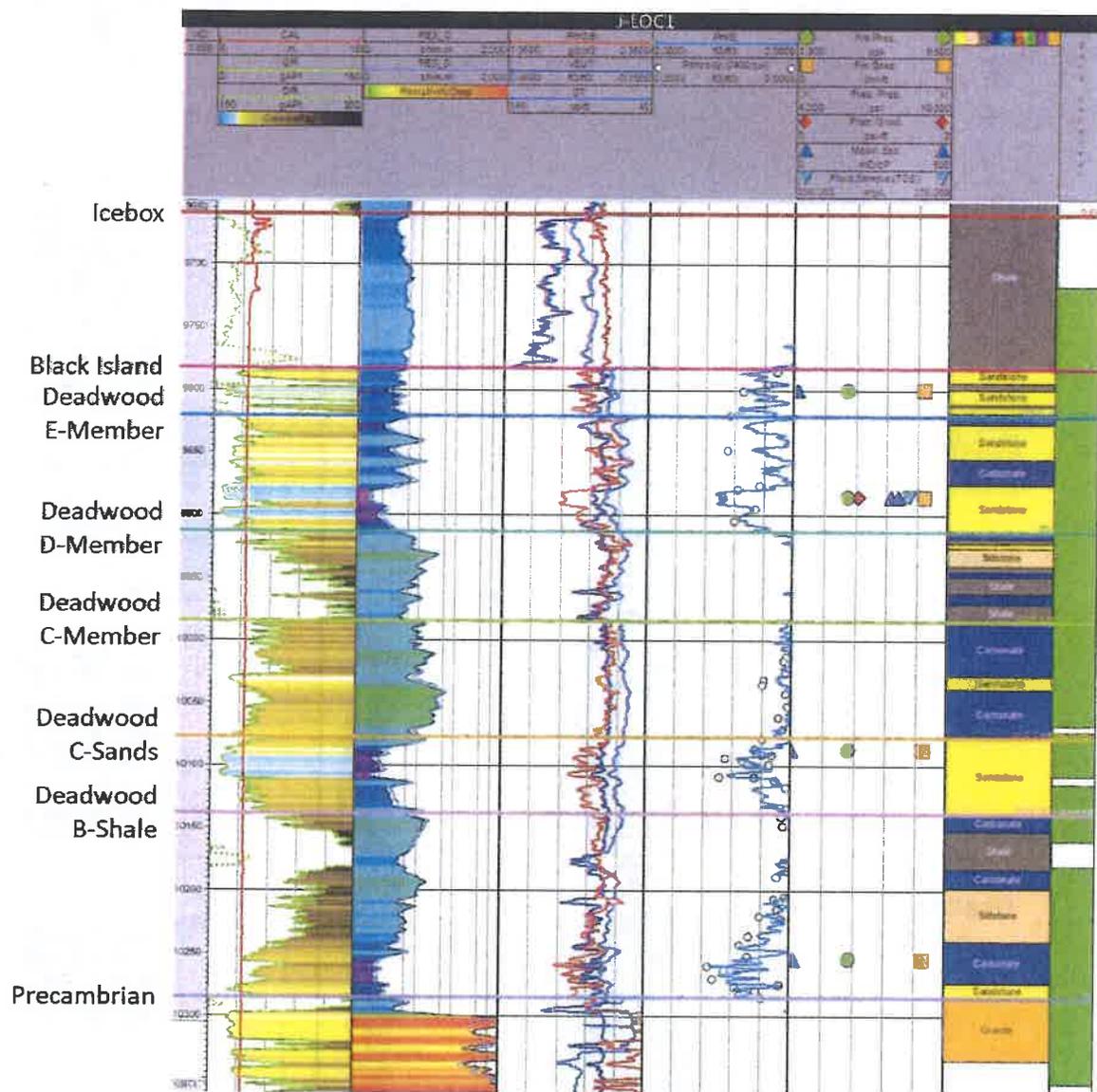


Figure 2-5a. Schematic showing vertical relationship of coring and testing intervals in the Icebox, Black Island, and Deadwood Formations and the Precambrian basement in the J-LOC1 well.

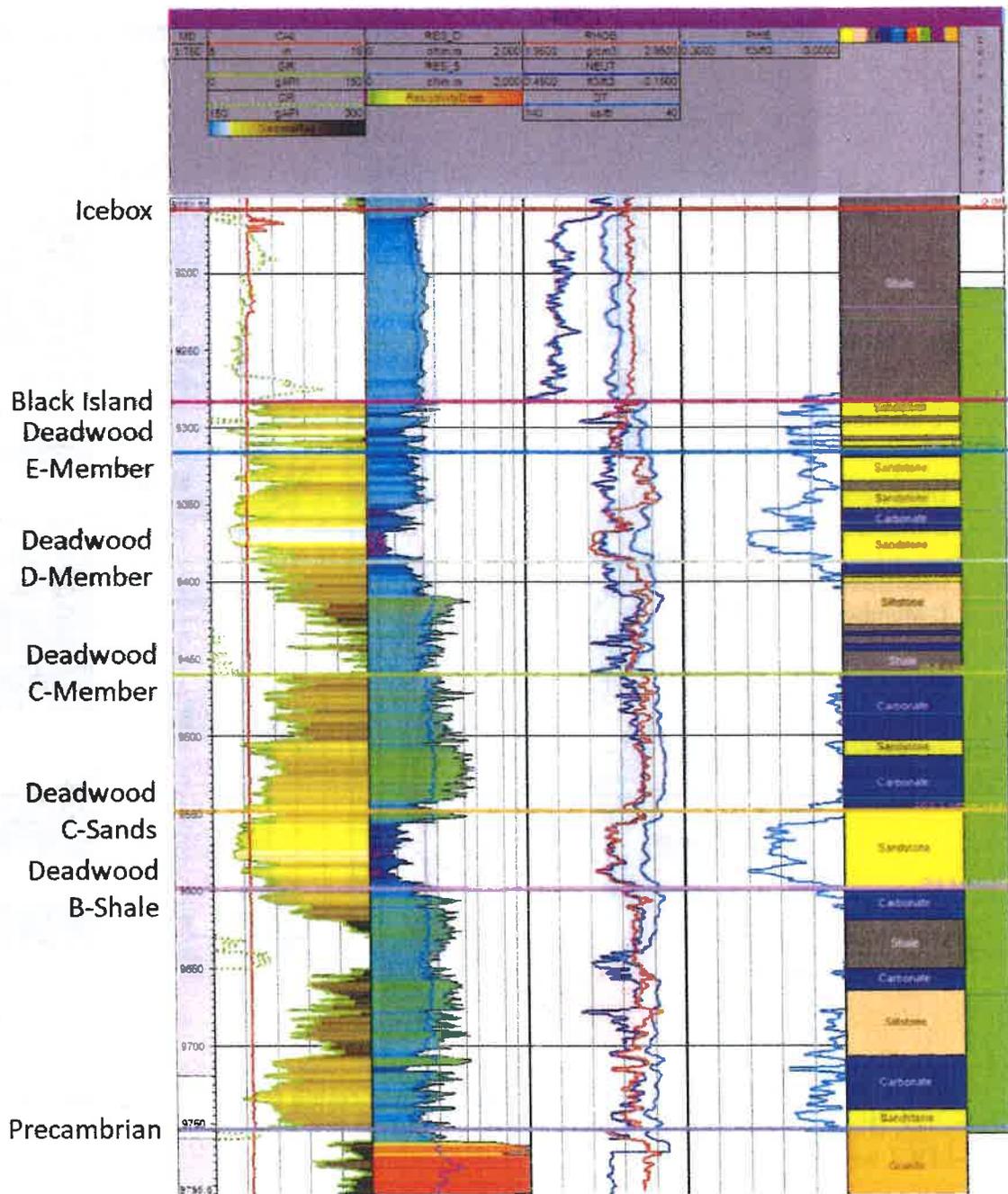


Figure 2-5b. Schematic showing vertical relationship of coring and testing intervals in the Icebox, Black Island, and Deadwood Formations and the Precambrian basement in the J-ROC1 well.

2.2.2.3 Formation Temperature and Pressure

Temperature data recorded from logging the J-LOC1 wellbore were used to derive a temperature gradient for the proposed injection site (Table 2-2). In combination with depth, the temperature gradient was used to distribute a temperature property throughout the geologic model of the study area. The temperature property was then used primarily to inform predictive simulation inputs and assumptions. Temperature data were also used as inputs for the geochemical modeling.

Pressure testing at J-LOC1 was performed with the Schlumberger MDT (modular formation dynamics testing) tool. A wireline-conveyed tool assembly incorporated a dual-packer module to isolate intervals, a large-diameter probe for formation pressure and temperature measurements, a pump-out module to pump unwanted mud filtrate, a flow control module, and sample chambers for formation fluid collection; see Appendix D, “Schlumberger, MDT.” The MDT tool formation pressure measurements from the Black Island and Deadwood Formations are included in Table 2-3. The calculated pressure gradients were used to model formation pressure profiles for use in the numerical simulations of CO₂ injection.

Table 2-2. Description of J-LOC1 Temperature Measurements and Calculated Temperature Gradients

Formation	Test Depth, ft	Temperature, °F
Icebox	9,751.17	182.97
	9,800.01	180.66
Black Island	9,884.89	182.94
Deadwood	9,885.14	180.68
	10,087.45	181.44
	10,254.12	184.26
Mean Black Island/Deadwood Temp., °F		182.00
Deadwood Temperature Gradient, °F/ft		0.01*

* The Black Island/Deadwood temperature gradient is an average of the MDT tool measured temperatures minus the average annual surface temperature of 40°F, divided by the associated test depth.

Table 2-3. Description of J-LOC1 Formation Pressure Measurements and Calculated Pressure Gradients

Formation	Test Depth, ft	Formation Pressure, psi
Black Island	9,800.01	4,506.66
Deadwood	9,884.89	4,548.42
Deadwood	9,885.14	4,548.27
Deadwood	10,087.45	4,650.86
Deadwood	10,254.12	4,734.49
Mean Black Island/Deadwood Pressure, psi		4,597.74
Deadwood Pressure Gradient, psi/ft		0.46*

* The Black Island/Deadwood pressure gradient is an average of the MDT tool measured pressures minus standard atmospheric pressure at 14.7 psi, divided by the associated test depth.

2.2.2.4 Microfracture In Situ Stress Tests

Using the Schlumberger MDT tool, microfracture in situ stress tests were performed in the J-LOC1 well. In situ reservoir testing measurements provide real-time formation pressure, formation temperature, fracture breakdown, propagation, and closure pressures. Microfracture in situ stress tests were attempted in the J-ROC1 well; however, because of extremely unstable wellbore conditions, the MDT stress tool run was not performed after a near loss of the tool in the wellbore.

Microfracture in situ stress tests were performed on the Icebox and Deadwood Formations in J-LOC1 (Table 2-4). The use of the dual-packer module on the MDT tool assembly to isolate the designated intervals tested a 1.5-ft section of the zone of interest. Fracture propagation pressures determined from the microfracture test in the J-LOC1 well were used to calculate pressure constraints related to the maximum allowable bottomhole pressure.

In the J-LOC1 wellbore, two microfracture in situ stress tests were performed in the Icebox Formation at 9,749.5 and 9,751.2 ft (Table 2-4). The interpretation of the results is provided in Section 2.4 Storage Reservoir Confinement Zone. Neither of the two tests attempted in the Icebox Formation were successful in depicting the formation breakdown pressure, with one predominant reason being the limitations of the dual-packer mechanical specifications having a set maximum differential pressure rating between the upper packer and hydrostatic pressure of 5,500 psi; see Appendix D, “Schlumberger Dual-Packer Module.” The inability to break down the Icebox Formation at the two depths indicated that the formation is very tight competent rock and exhibits sufficient geologic integrity to contain the injected CO₂ stream. One microfracture in situ stress test was performed in the Deadwood Formation, at 9,885.1 ft, with interpretation of the results provided in Section 2.3 Storage Reservoir Injection Zone (Table 2-4).

Table 2-4. Description of J-LOC1 Microfracture In Situ Stress Tests

Formation	Test Depth ft	Breakdown Pressure		Propagation Pressure		Closure Pressure		Initial Shut-In Pressure	
		psi	Gradient, psi/ft	Avg., psi	Gradient, psi/ft	psi	Gradient, psi/ft	Avg., psi	Gradient, psi/ft
Icebox	9,749.5	No observed formation breakdown. Maximum applied injection pressure = 10,984.9 psi							
	9,751.2	No observed formation breakdown. Maximum applied injection pressure = 10,867.24 psi							
Deadwood	9,885.1	8,231	0.833	7,450	0.754	7,393.55	0.748	N/A	

2.2.2.5 Fluid Samples

Fluid samples from the Deadwood Formation were collected from the J-LOC1 wellbore via the MDT tool (Appendix D, “Schlumberger Saturn 3D Radial Probe”). The sample was analyzed by Minnesota Valley Testing Laboratories, a state-certified lab, and confirmed by the Energy & Environmental Research Center (EERC). The sample collected at a depth of 9,884.9 ft had total dissolved solids of 256,000 mg/L. Fluid sample analysis results were used as inputs for geochemical modeling and dynamic reservoir simulations. Fluid sample analysis reports can be found in Appendix B.

In situ pressure testing was performed in the Icebox Formation (upper confining zone) with the MDT tool. This test used the tool's large-diameter probe to test both the mobility and reservoir pressure (Appendix D). During the test, the formation was unable to rebound (build pressure) because of low (nearly zero) permeability. This result suggested that neither the reservoir pressure nor an in situ fluid sample could be measured or collected from the Icebox Formation. The testing results provide further evidence of the confining properties of the Icebox Formation, ensuring sufficient geologic integrity to contain the injected CO₂ stream.

2.2.2.6 Seismic Survey

A 5-mi-long seismic source test and 6.5-mi² 3D seismic survey were acquired in 2019, and a 12-mi² 3D seismic survey and 21 mi of 2D seismic lines were acquired in 2020 (Figure 2-6). The 3D seismic data allowed for visualization of deep geologic formations at lateral spatial intervals as short as tens of feet. The 2D seismic data provided a means to connect the two

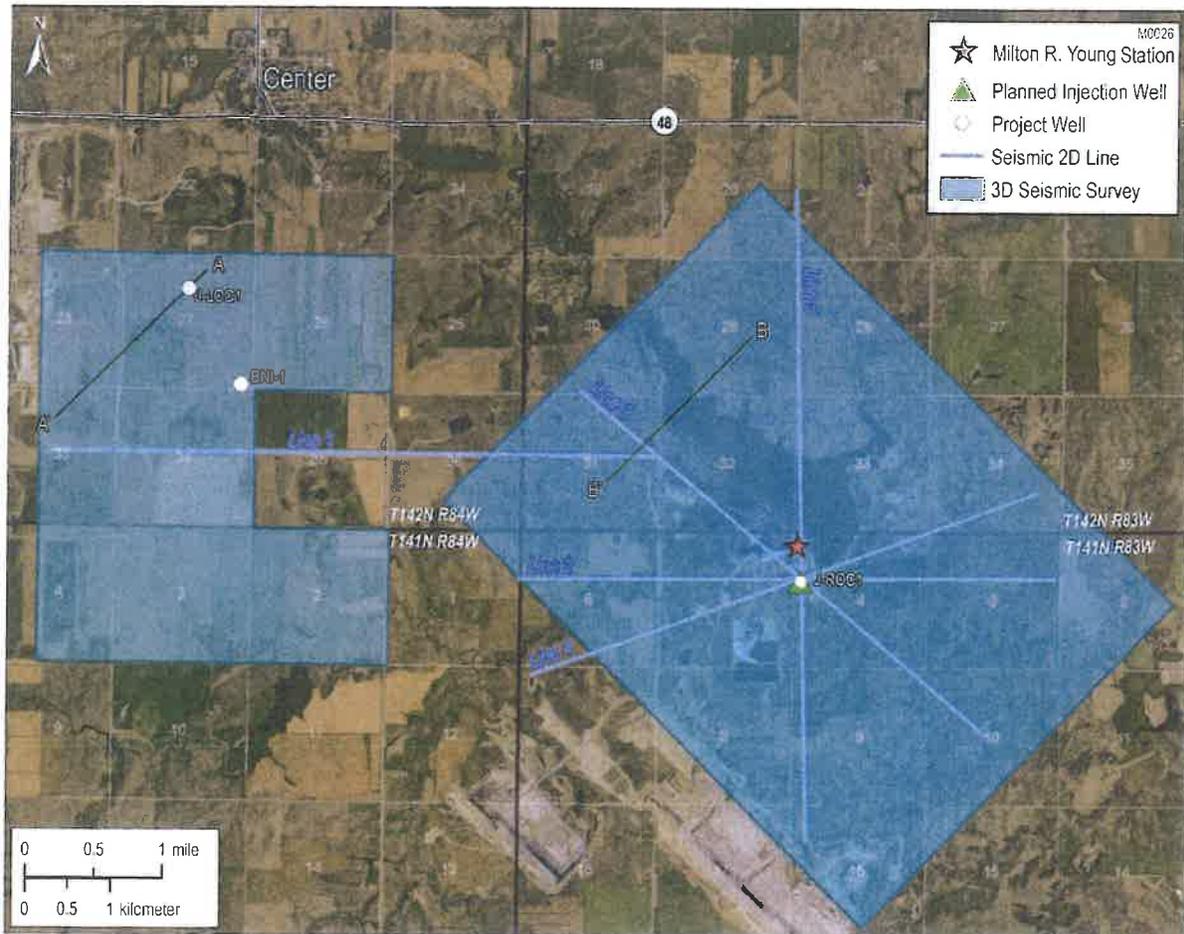


Figure 2-6. Map showing the 2D and 3D seismic surveys in the Tundra SGS area.

3D seismic data sets and ensure consistent interpretation across the entire Tundra SGS area. The seismic data were used for an assessment of the geologic structure, interpretation of interwell heterogeneity, and well placement. Data products generated from the interpretation and inversion of the 3D seismic data were used as inputs into the geologic model. Additionally, the geologic model that was informed by the seismic data was used to simulate migration of the CO₂ plume. These simulated CO₂ plumes were used to inform the testing and monitoring plan (Section 4.0).

The 3D seismic data and J-LOC1 and J-ROC1 well logs were used to interpret surfaces for the formations of interest within the survey area. These surfaces were converted to depth using the time-to-depth relationship derived from the J-LOC1 and J-ROC1 sonic logs. The depth-converted surfaces for the storage reservoir and upper and lower confining zones were used as inputs for the geologic model. These surfaces captured detailed information about the structure and varying thickness of the formations between wells. Interpretation of the 3D seismic data suggests there are no major stratigraphic pinch-outs or structural features with associated spill points in the Black Island/Deadwood storage complex in the Tundra SGS area. There were also no structural features, faults, or discontinuities that would cause a concern about seal integrity in the strata above the Black Island Formation observed in the seismic data.

In addition, the 3D seismic data were used to gain a better understanding of interwell heterogeneity across the Tundra SGS area for petrophysical property distributions. Acoustic impedance volumes were created using the 3D seismic and petrophysical data from the J-LOC1 and J-ROC1 wells (e.g., dipole sonic and density logs) (Figure 2-7). The acoustic impedance volumes were used to classify lithofacies of the Deadwood Formation and distribute lithofacies through the geologic model as well as inform petrophysical property distribution in the geologic model.

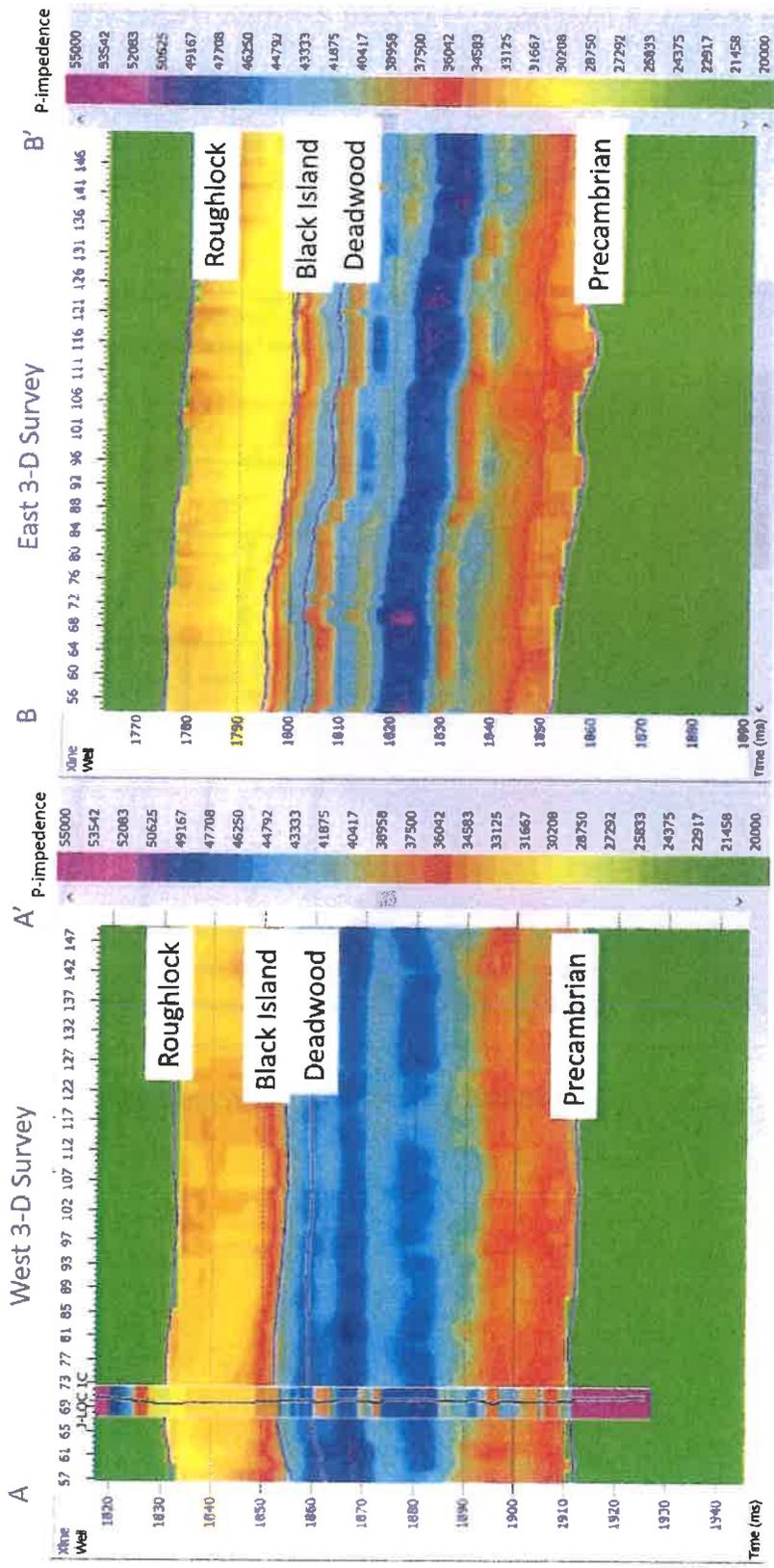


Figure 2-7. Left: cross section of the inverted acoustic impedance volume for the western seismic 3D survey that transects the J-LOC1 well. The acoustic impedance log calculated from the J-LOC1 sonic and density logs is shown on the inset panel. Right: cross section of the inverted acoustic impedance volume for the eastern 3D survey.

2.3 Storage Reservoir (injection zone)

Regionally, the Black Island and Deadwood Formations are laterally extensive (Figure 2-8). The Black Island comprises high-energy shallow marine sandstone (permeable storage intervals) and shale (impermeable layers). The sandy members (C-sand and E member) of the Deadwood Formation comprise reworked quartz arenites of marginal marine environment (Figure 2-9). The Deadwood Formation unconformably overlies the Precambrian basement and is unconformably overlain by the sands of the Black Island Formation followed by the conformable Icebox Formation (Figure 2-3).

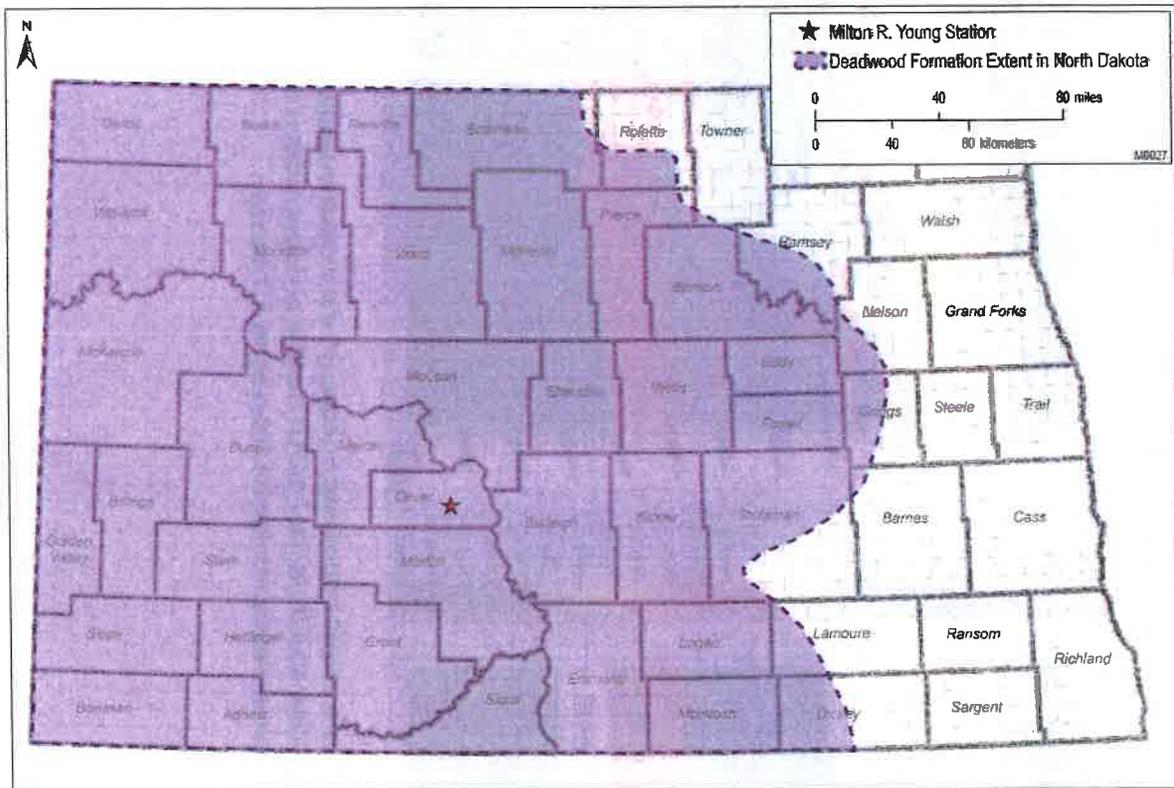


Figure 2-8. Areal extent of the Deadwood Formation in North Dakota (modified from Nesheim, 2012b).

NDGS # 6228
 Gulf Oil Corp.
 Zabolotny No. 1-3-4-A
 NW-SE sec 3, T144N, R98W
 Billings Co., N. D.

EERC JS28634.CDR

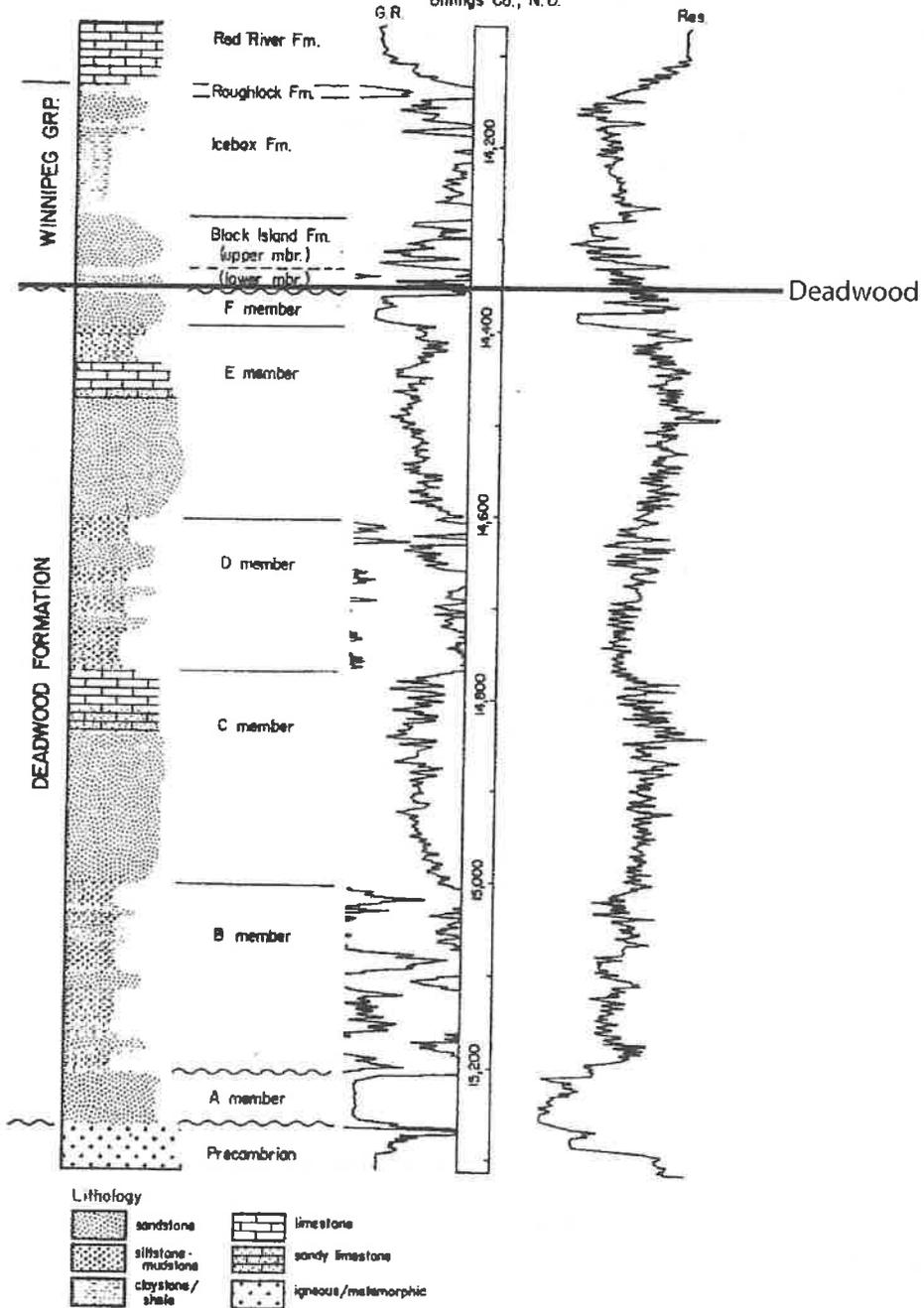


Figure 2-9. Type log showing the interpreted Deadwood members within the Williston Basin (Lefever and others, 1987).

At J-ROC1, the Deadwood C-sand member is made up of 50 ft of sandstone and is located at a depth of 9,548 ft. Across the model area, the Deadwood C-sand member varies in thickness from 40 to 88 ft, with an average thickness of 64 ft. Based on offset well data and geologic model characteristics, the Deadwood C-sand member is 100% sandstone. The Deadwood E member and Black Island Formations are made up of 69 ft of sandstone and 19 ft of dolostone and limestone at J-ROC1 and are located at a depth of 9,283 ft. Across the project area, the Deadwood E member varies in thickness from 0 to 139 ft, with an average thickness of 81 ft. The Black Island Formation varies in thickness from 14 to 77 ft, with an average of 36 ft. Based on offset well data and geologic model characteristics, the net reservoir thickness within the project area ranges from 63 to 287 ft, with an average of 165 ft (Figure 2-10).

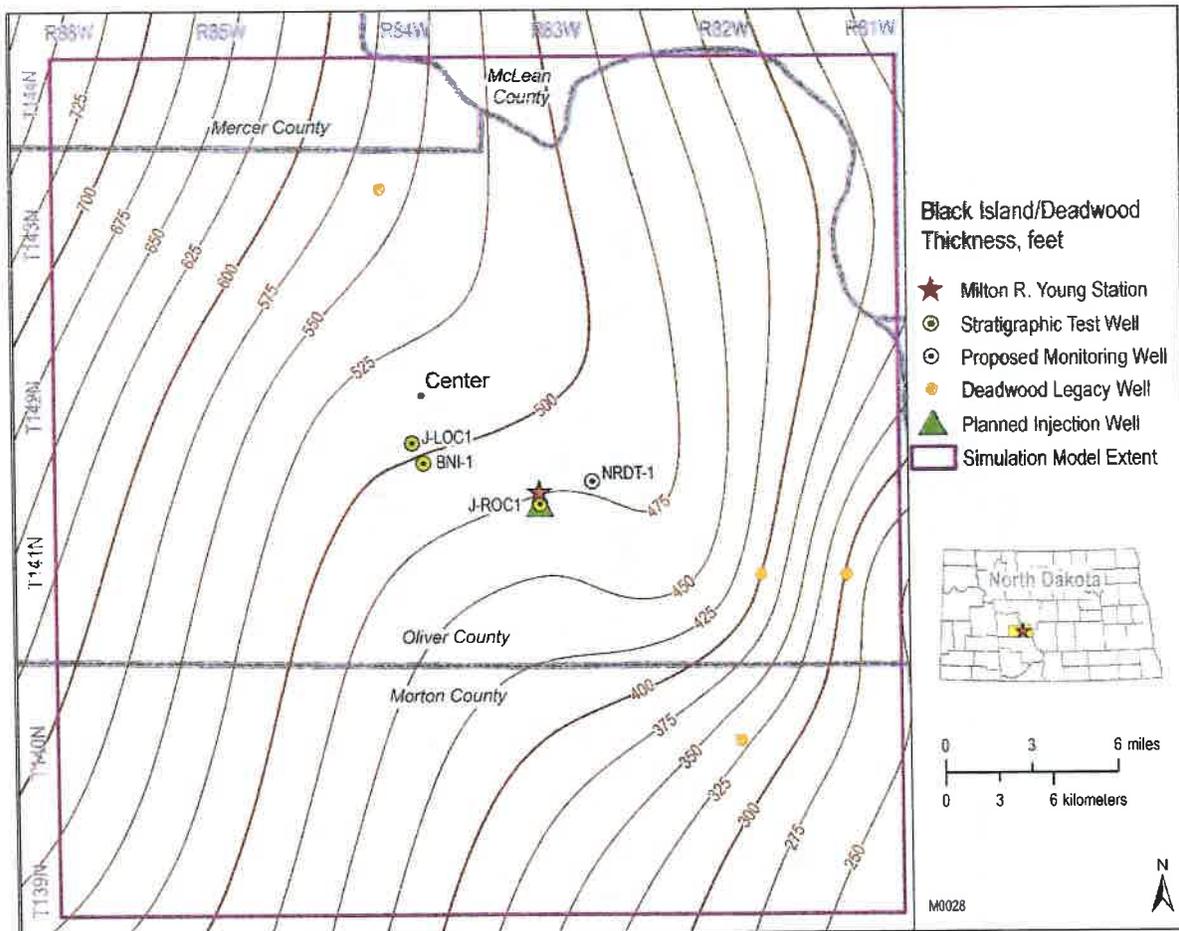


Figure 2-10. Isopach map of the Black Island and Deadwood Formations in the simulation model extent.

The well log signatures for the Black Island and Deadwood storage complex are consistent and predictable across the project area. The following are the correlation definitions used to indicate the reservoir and confining zones (Figure 2-11):

- The Icebox Formation is indicated at the transitions between a moderate GR, higher resistivity, low neutron, high density, and moderate compressional sonic for the base of the Roughlock Formation to the high GR, low resistivity, high neutron, high density, and high compressional sonic. The Icebox Formation is correlative across the project area.
- The Black Island Formation is indicated by the transition from the Icebox Formation to a relatively low GR, low neutron, high density, and low compressional sonic. The Black Island has interbedded high-GR and moderate-resistivity sections.
- The Deadwood Formation (Deadwood E member) is indicated by a transition from the base high GR signature of the Black Island Formation to a low GR signature, lower neutron, higher density, and lower compressional sonic. The Deadwood E thins from west to east across the project area.
- The Deadwood D member (base of Deadwood E member) is indicated by a transition to moderate to higher GR from top to base, higher resistivity, low neutron, high density, and low to higher compressional sonic from top to base.
- The Deadwood C member is the transition between the high GR of the Deadwood D member and moderate GR, higher resistivity, low neutron, high density, and low compressional sonic. The Deadwood C-sand member at the base of the Deadwood C member is indicated by a section of low GR (10 API), low resistivity, moderate neutron, moderate density, and moderate compressional sonic.
- The Deadwood B member (base of Deadwood C-sand member) is indicated by the transition from a low GR signature of the Deadwood C-sand member to a high GR, higher resistivity, low neutron, high density, and higher compressional sonic.
- The Deadwood B member shale unit is indicated by a higher GR, moderate resistivity, higher neutron, moderate density, and high compressional sonic. This unit is contained within the Deadwood B member and can be correlated across the project area.
- The Precambrian basement is indicated by a change from low to relatively high GR, low-to-moderate resistivity, and a lower compressional sonic character that can be correlated across the project area.

Seismic data collected as part of site characterization efforts (Figure 2-6) were used to reinforce structural correlation and thickness estimations of the storage reservoir. The combined structural correlation and analyses indicate that there should be few-to-no major reservoir stratigraphic discontinuities near J-LOC1 and J-ROC1 (Figures 2-12a and 2-12b). The Deadwood E member pinches out 12.5 mi to the east of the J-ROC1 site. A structure map of the Deadwood and Black Island Formations shows no detectable features (e.g., folds, domes, or fault traps) with associated spill points in the project area (Figure 2-13).

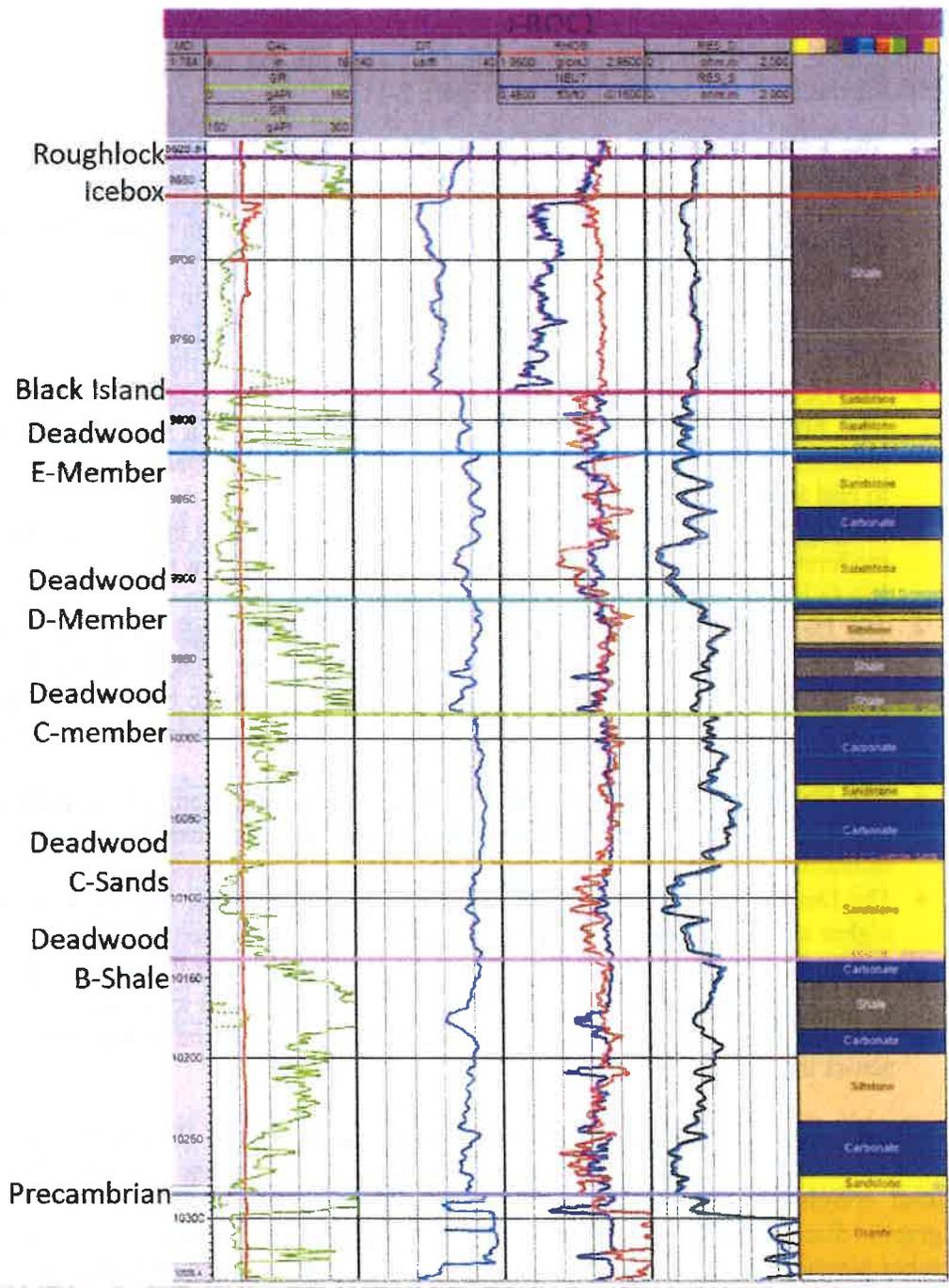


Figure 2-11. Well log display of the interpreted lithologies of the Roughlock, Icebox, Black Island, Deadwood, and Precambrian in J-ROCI.

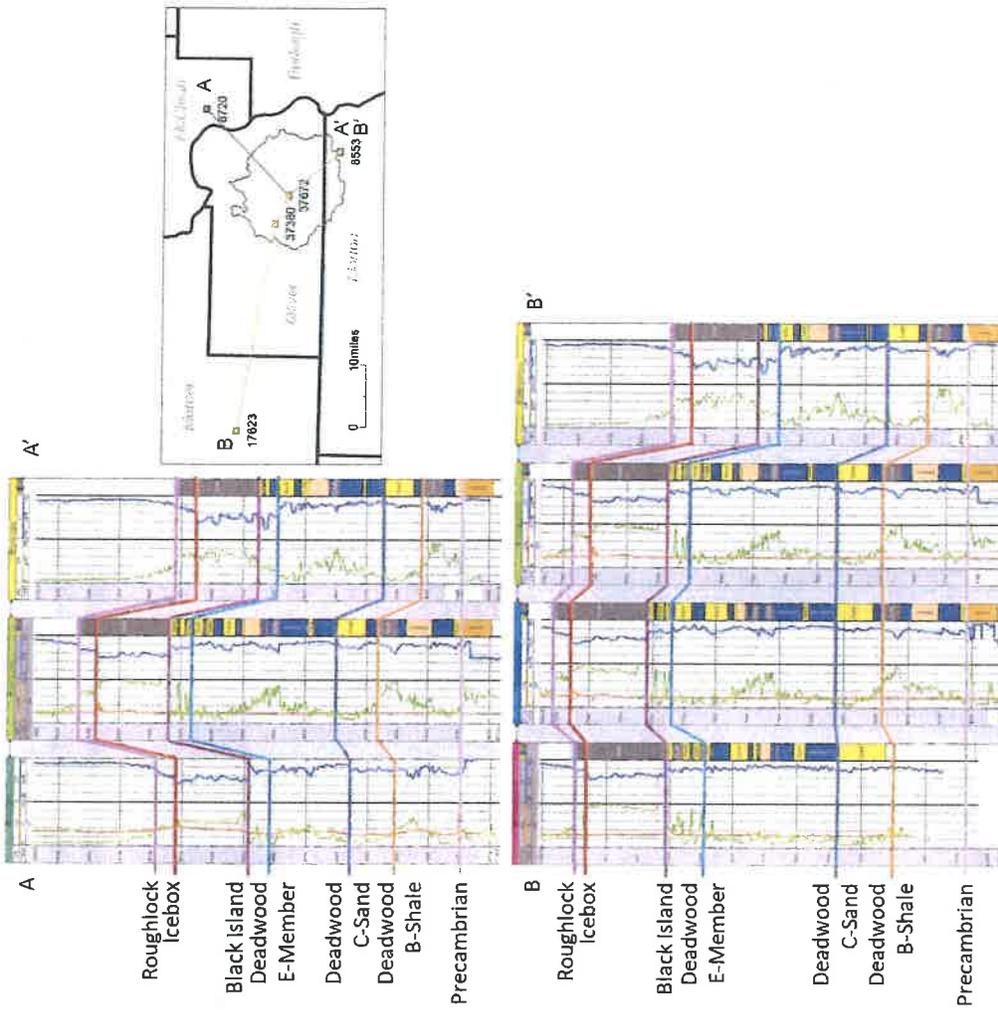


Figure 2-12a. Regional well log stratigraphic cross sections of the Roughlock, Icebox, Black Island, and Deadwood Formations and the Precambrian basement flattened on the top of the Precambrian basement. Logs displayed in tracks from left to right are 1) GR (green) and caliper (red), 2) delta time (blue), and 3) interpreted lithology log.

Note: Wells in these cross sections are spaced evenly. These figures do not portray the relative distance between wells. Because of the spacing, structure may appear more drastic than it actually is.

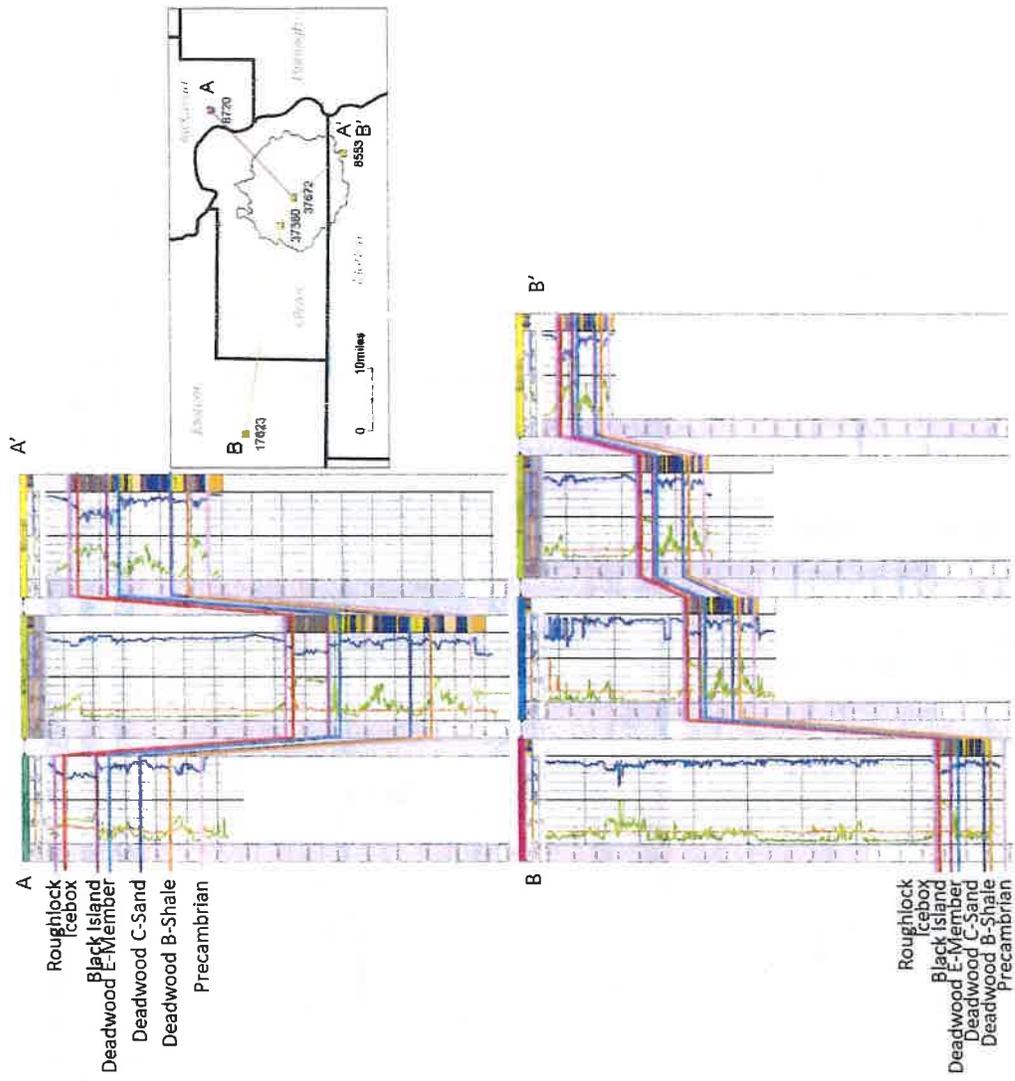


Figure 2-12b. Regional well log cross sections showing the structure of the Roughlock, Icebox, Black Island, and Deadwood Formations and the Precambrian basement. Logs displayed in tracks from left to right are 1) GR (green) and caliper (red) and 2) delta time (blue).
 Note: Wells in these cross sections are spaced evenly. These figures do not portray the relative distance between wells. Because of the spacing, structure may appear more drastic than it actually is.

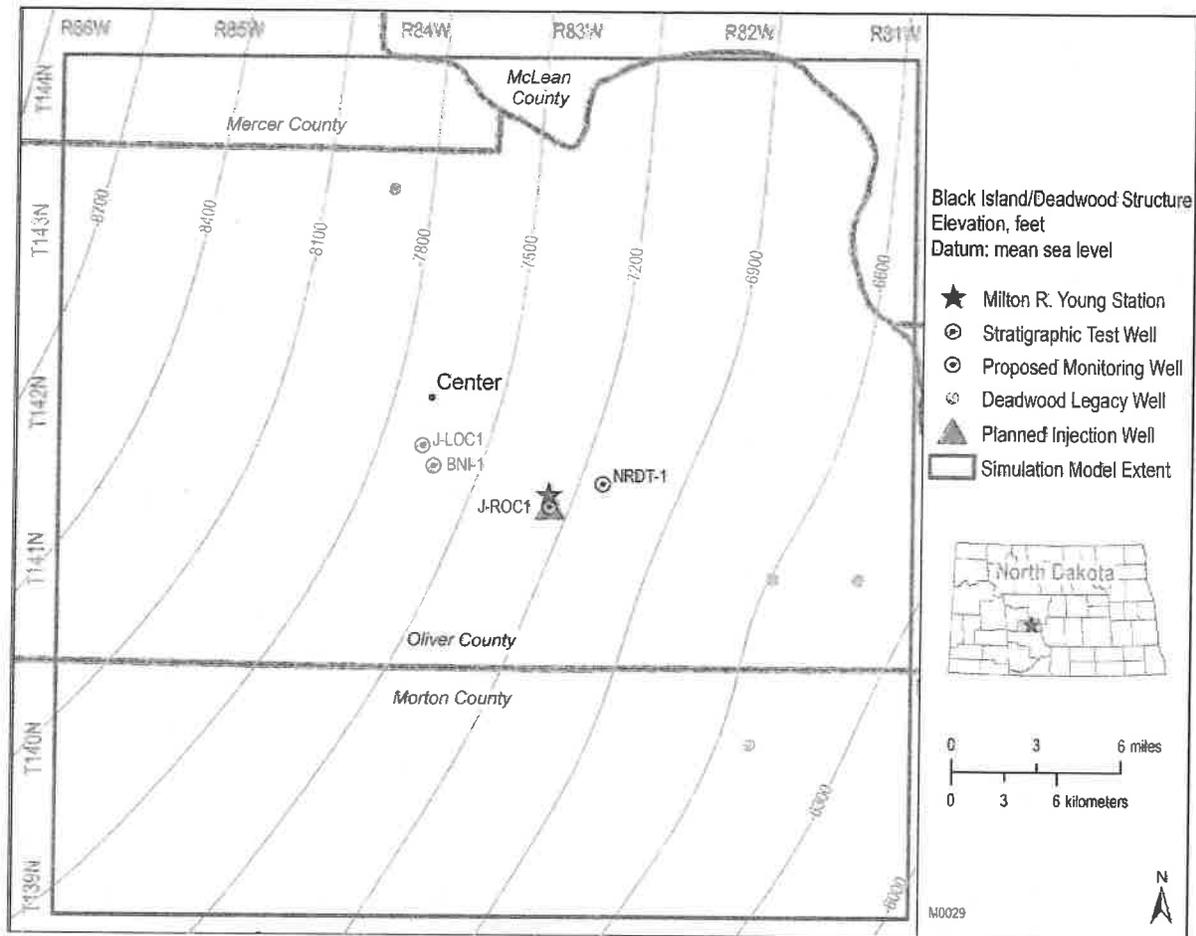


Figure 2-13. Structure map of the Black Island and Deadwood Formations across the simulation model extent.

Eighty-three 1-in.-diameter core plug samples were taken from the sandstone, limestone, and dolostone lithofacies of Deadwood members and Black Island core retrieved from the J-LOC1 well. These core samples were used to determine the distribution of porosity and permeability values throughout the formation.

Analysis of eight core samples of Deadwood E member core from J-LOC1 showed porosity values ranging from 6.85% to 14.3% and permeability ranging from 0.0325 to 2,060 mD. Porosity and permeability measurements from the J-LOC1 Black Island core samples (five) have porosity values ranging from 3.4% to 10.3% and permeability ranging from 0.0019 to 157 mD (Table 2-5). The wide range in porosity and permeability reflects the differences between the sandstone, limestone, and dolostone lithofacies in the Deadwood E member.

Table 2-5. Description of CO₂ Storage Reservoir (injection zone) at the J-LOC1 Well

Injection Zone Properties			
Property	Description		
Formation Name	Black Island, Deadwood E member, and Deadwood C-sand member		
Lithology	Sandstone, dolostone, limestone		
Formation Top Depth, ft	9782.2, 9820.9, and 10,077.4		
Thickness, ft	38.9, 92.3, and 60.9		
Capillary Entry Pressure (CO ₂ /Brine), psi	0.16		
Geologic Properties			
Formation	Property	Laboratory Analysis	Model Property Distribution
Black Island (sandstone)	Porosity, %*	8.0 (3.4–10.3)	5.6 (1.1–14.8)
	Permeability, mD**	3.7 (0.0019–157)	0.805 (<0.0001–96.0)
Deadwood E Member (sandstone)	Porosity, %	10 (6.85–14.43)	7.0 (0–17.7)
	Permeability, mD	5.63 (0.0325–2,060)	3.88 (<0.0001–4549.2)
Deadwood C-Sand Member	Porosity, %	7.6 (1.01–14.69)	7.6 (0.3–17.2)
	Permeability, mD	11 (0.0018–1140)	7.03 (<0.0001–830.3)

* Porosity values are reported as the arithmetic mean followed by the range of values in parentheses.

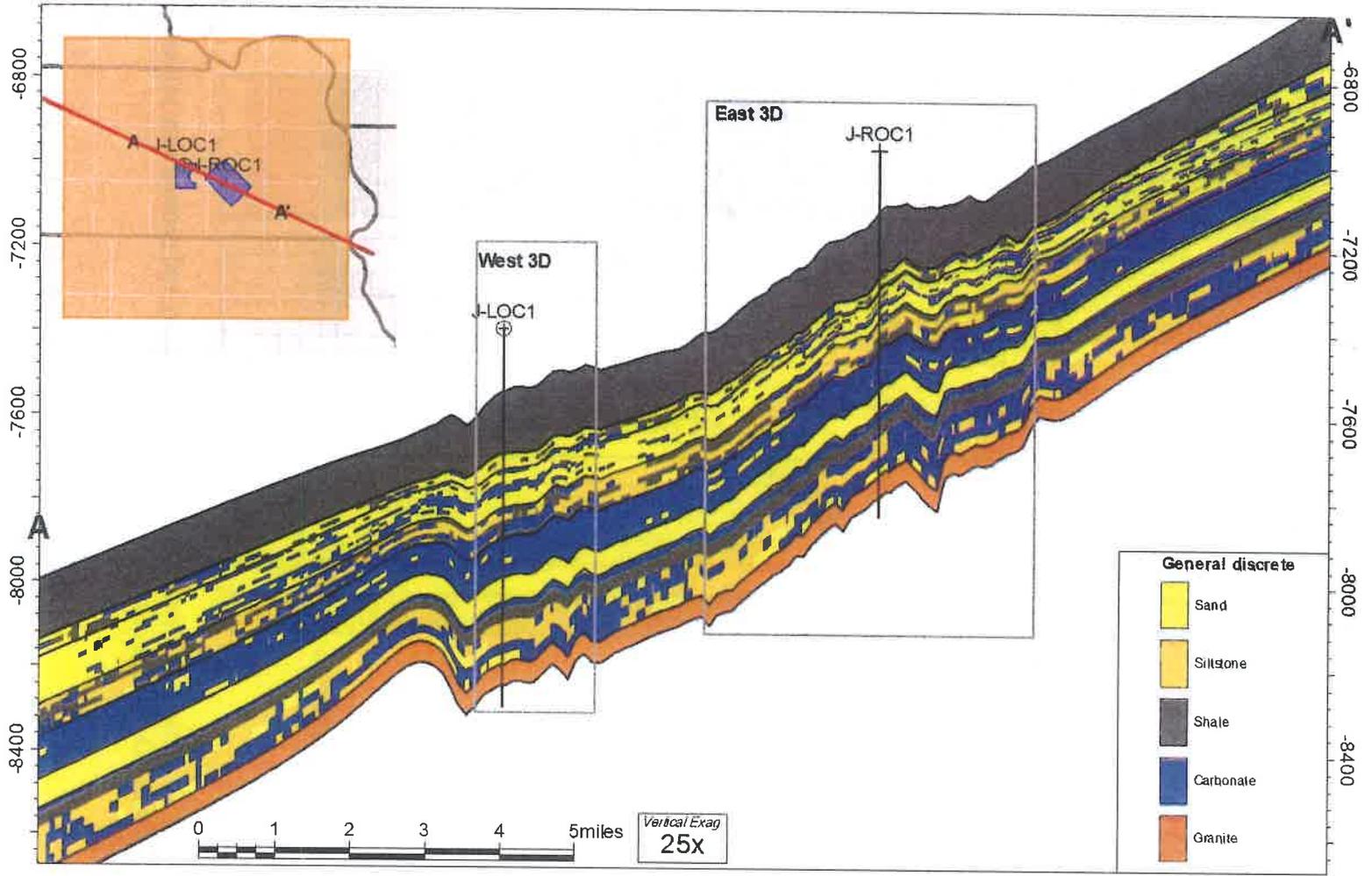
** Permeability values are reported as the geometric mean followed by the range of values in parentheses.

Analysis of 12 core samples from the sandstone portion of the Deadwood C-sand member core from J-LOC1 showed porosity values ranging from 1.01% to 14.69%, with an average of 7.6%. Permeability of the sandstone samples ranged from 0.0018 to 1,140 mD, with a geometric average of 11 mD (Table 2-5 and Figure 2-14).

Sandstone intervals in the Black Island and Deadwood Formations are associated with low GR, moderate density, average porosity (estimated from neutron, density, and sonic), low resistivity due to high brine salinity, and moderate compressional sonic velocity measurements. The dolostone and limestone intervals in the formation are associated with increased GR measurements compared to the sandstone intervals, in addition to high density, low porosity (estimated from neutron, density, and sonic), relatively high resistivity, and low sonic velocity measurements.

Core-derived measurements were used as the foundation for the generation of porosity and permeability properties within the 3D geologic model (Figure 2-15). The core sample measurements showed good agreement with the wireline logs collected from J-LOC1. This agreement allowed for confident extrapolation of porosity and permeability from offset well logs, thus creating a spatially and computationally larger data set to populate the geologic model. The model property distribution statistics shown in Table 2-5 were derived from a combination of the core analysis and the larger data set derived from offset well logs. A 5 multiplier for permeability was applied to the geologic model based on injection test results (Appendix A).

Deadwood Lithology



2-23

Figure 2-14. Cross section of the Tundra SGS CO₂ storage complex from the geologic model showing lithofacies distribution in the Deadwood Formation. Depths are referenced to mean sea level.

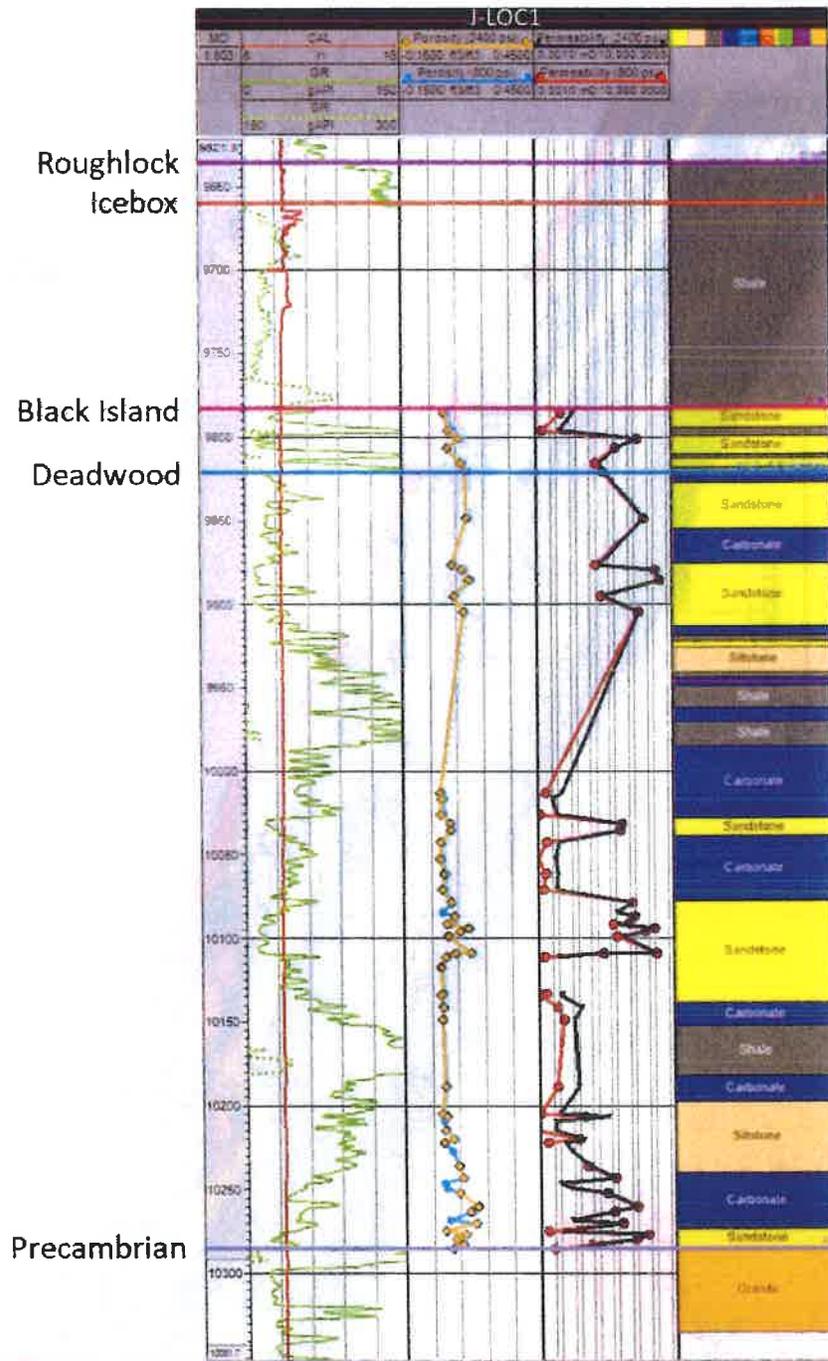


Figure 2-15. Vertical distribution of core-derived porosity and permeability values in the Tundra SGS CO₂ storage complex.

Pressure testing in the Deadwood Formation included a total of four formation pressure measurements via an MDT tool in J-LOC1. All tests resulted in good agreement, with reservoir pressures recorded that ranged from 4,548.27 to 4,734.49 psi. These pressures were used to derive a pressure gradient of 0.46 psi/ft. This pressure gradient was used to calculate a formation pressure profile for use in the numerical simulations of CO₂ injection.

A microfracture in situ test was performed within the Deadwood Formation via the Schlumberger MDT tool in the J-LOC1 well. The test was conducted 64.14 ft below the top of the formation. The results of this test are shown in Table 2-6, with a supporting graph for derivation of averages in Figure 2-16.

Table 2-6. Deadwood Microfracture Results from J-LOC1

Depth, ft	9,885.1	
Pressure/Gradient	psi	psi/ft
Breakdown	8,231	0.833
Avg. Fracture Propagation	7450	0.754
Avg. Closure	7,393.55	0.748

The measured temperature of the Deadwood Formation in J-LOC1 was 181.44°F at a depth of 10,087.5 ft. Using an average surface temperature of 40°F, the resulting temperature gradient for the Deadwood Formation is 0.01°F/ft.

$$\frac{181.44^{\circ}\text{F}-40^{\circ}\text{F}}{10087.5 \text{ ft}} = 0.01^{\circ}\text{F}/\text{ft} \quad [\text{Eq. 1}]$$

Fluid samples collected via an MDT tool in J-LOC1 from the Deadwood Formation were analyzed by a state-certified lab and confirmed by the EERC. A description of the fluid sample is found in Section 2.2.2.5.

2.3.1 J-LOC1 Injectivity Tests

The J-LOC1 formation well testing was performed specifically to characterize the injectivity and obtain the breakdown pressure of the Deadwood Formation in December 2020. The well testing consisted of step rate test, extended injection test, and pressure fall-off test. The well was perforated from 9,880 to 9,890 ft with 4 shots per foot (spf) and 90° phasing. To record the bottomhole pressure, a downhole memory gauge was installed at a depth of 9,855 ft. The well test data were interpreted by GeothermEx, a Schlumberger Company.

The step rate test was performed with a total of ten injection rates. The initial injection rate was 2.00 barrels per minute (bpm), and the final injection rate was 10.5 bpm. From the step rate test evaluation, no definitive analysis can be concluded from this test, but injection at the higher rate was below fracture opening pressure. Figure 2-17 provides the step rate test data of the Deadwood Formation.

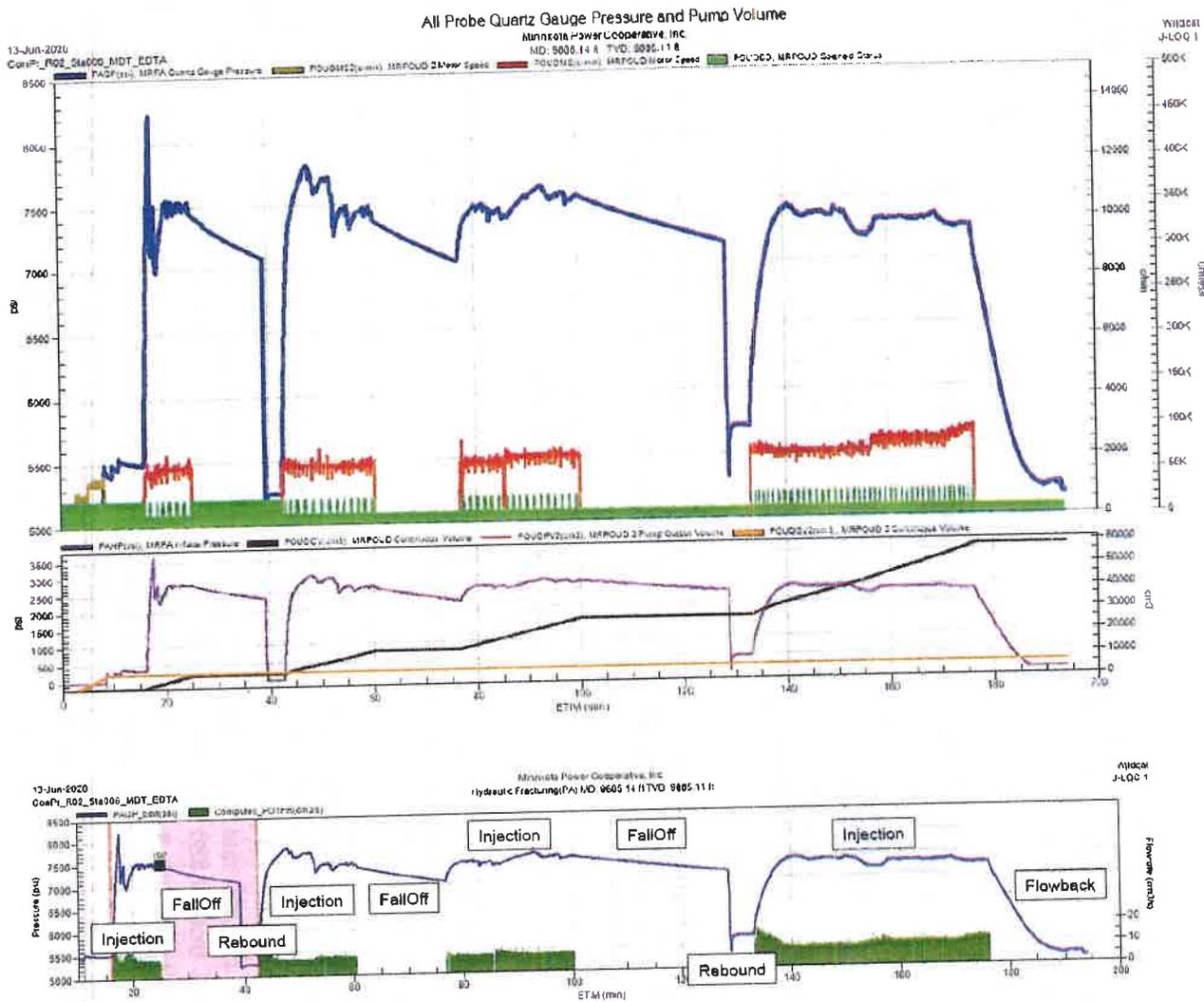


Figure 2-16. J-LOC1 Deadwood Formation MDT microfracture in situ stress pump cycle graph at 9,885.1 ft.

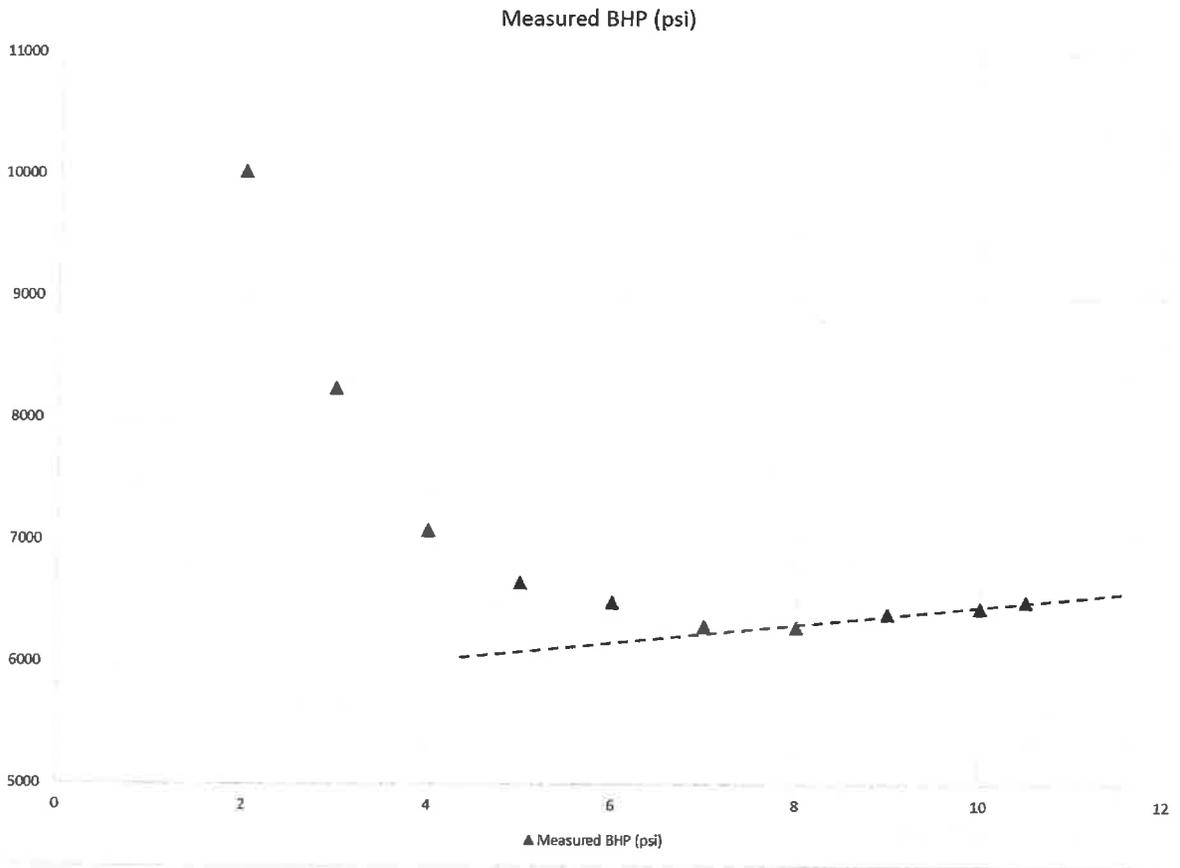


Figure 2-17. Step rate test data from the Deadwood Formation with no fracture opening pressure observed (courtesy of GeothermEx, a Schlumberger Company). The x-axis is injection rate in bpm while the y-axis is bottomhole injection pressure in psi.

A 12-hour extended injection rate was performed at a constant rate of 4.5 bpm followed by a 24-hour pressure fall-off test. The pressure fall-off data interpretation showed a permeability of 1,621 mD, with reservoir pressure of 4,521 psi. There was no lateral boundary observed from the pressure fall-off test within the radius of investigation of 9,183 ft, as shown in Figures 2-18 and 2-19. The Deadwood Formation well testing is summarized in Table 2-7.

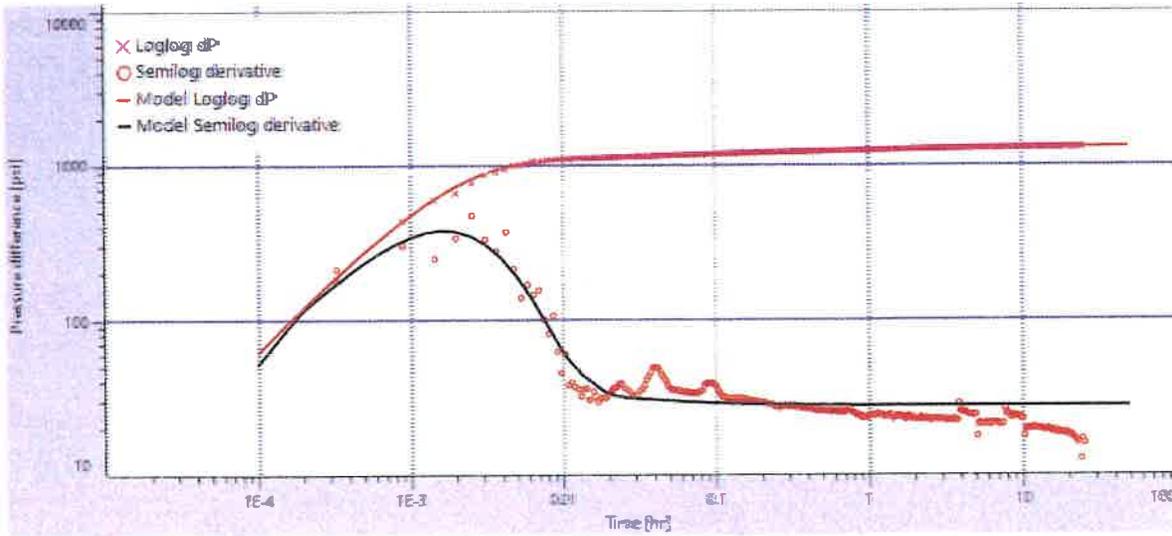


Figure 2-18. GeothermEx interpretation of the Deadwood Formation pressure fall-off test using Saphir – Kappa (courtesy of GeothermEx, a Schlumberger Company).

Formation	Deadwood
Perforation Interval (ft)	9,880 to 9,890
Estimated Formation Thickness (ft)	10
Tested Interval Thickness (ft)	10
Formation Transmissibility (mD.ft)	16,213
Formation Permeability (mD)	1,621
Skin Factor	13
Investigation Radius (ft)	9,183
Boundary Condition	Infinite Acting

Comments

Quality PFO test, good confidence in formation parameters assessed. Step rate test uninterpretable due to near well properties rapidly changing.

Figure 2-19. Deadwood well test summary of J-LOC1 well (modified from Schlumberger's presentation).

Table 2-7. J-LOC1 Deadwood Formation Test Summary

Parameters	Value	Unit
Reservoir Pressure	4,521	psi
Permeability	1,621	mD
Radius of Investigation	9,183	ft
Type of Boundary	Infinite acting	

2.3.2 Mineralogy

The combined interpretation of core, well logs, and thin sections shows that the Deadwood Formation is composed of fine- to medium-grained sandstone and several interbeds of carbonates (dolostone and limestone). Seventy-eight depth intervals representing nearly 274 ft of the Deadwood Formation were sampled for thin-section creation, XRD mineralogical determination, and XRF bulk chemical analysis. For the assessment below, thin sections and XRD provided an independent confirmation of the mineralogical constituents of the Deadwood Formation.

Thin-section analysis of the sandstone intervals shows that quartz (85%) is the dominant mineral. Throughout these intervals are minor occurrences of feldspar (5%), dolomite (5%), and calcite as cements (5%). Where present, calcite and dolomite are crystallized between quartz grains and obstruct the intercrystalline porosity. The contact between grains is long (straight) to tangential. The porosity due to quartz and feldspar dissolution ranges from 5% to 14%.

Four distinct carbonate intervals are notable. The first is the presence of a fine- to medium-grained dolostone (80%), with quartz of variable size and shape (10%) and calcite (10%) present. The porosity is not well-developed, averaging 5%. Diagenesis is expressed by dolomitization of the original calcite grains and dissolution of quartz grains. Fossils are not present in this interval. In the second occurrence of carbonate, the texture becomes coarse and more fossil-rich, comprising fine-grained limestone (80%), dolomite 10%, and quartz (10%). Diagenesis is expressed by dolomitization of the original calcite grains. The porosity is mainly fracture-related and averages 2%.

XRD data from the samples supported facies interpretations from core descriptions and thin-section analysis. The Deadwood Formation core primarily comprises quartz, feldspar, dolomite, calcite, anhydrite, clay, and iron oxides (Figure 2-20).

XRF data are shown in Figure 2-21a and 2-21b for the Black Island and Upper Deadwood Formations. As shown, the majority of the Upper Deadwood sandstone, calcite, and dolomite intervals are confirmed through the high percentages of SiO₂, CaO, and MgO. The presence of certain percentages of CaO and SO₃ at 10,077 ft indicates a presence of anhydrite as cement. The formation shows very little clay, with a range of 0.5% to 10% being the highest detected.

2.3.3 Mechanism of Geologic Confinement

For Tundra SGS, the initial mechanism for geologic confinement of CO₂ injected into the Deadwood Formation will be the cap rock (Icebox interval), which will contain the initially buoyant CO₂ under the effects of relative permeability and capillary pressure. Lateral movement of the injected CO₂ will be restricted by residual gas trapping (relative permeability) and solubility trapping (dissolution of the CO₂ into the native formation brine), confining the CO₂ within the

proposed storage reservoir, as identified in Figure 2-3. After the injected CO₂ becomes dissolved in the formation brine, the brine density will increase. This higher-density brine will ultimately sink in the storage formation (convective mixing). Over a much longer period (>100 years), mineralization of the injected CO₂ will ensure long-term, permanent geologic confinement. Injected CO₂ is not expected to adsorb to any of the mineral constituents of the target formation; therefore, this process is not considered to be a viable trapping mechanism in this project. Adsorption of CO₂ is a trapping mechanism notable in the storage of CO₂ in deep unminable coal seams.

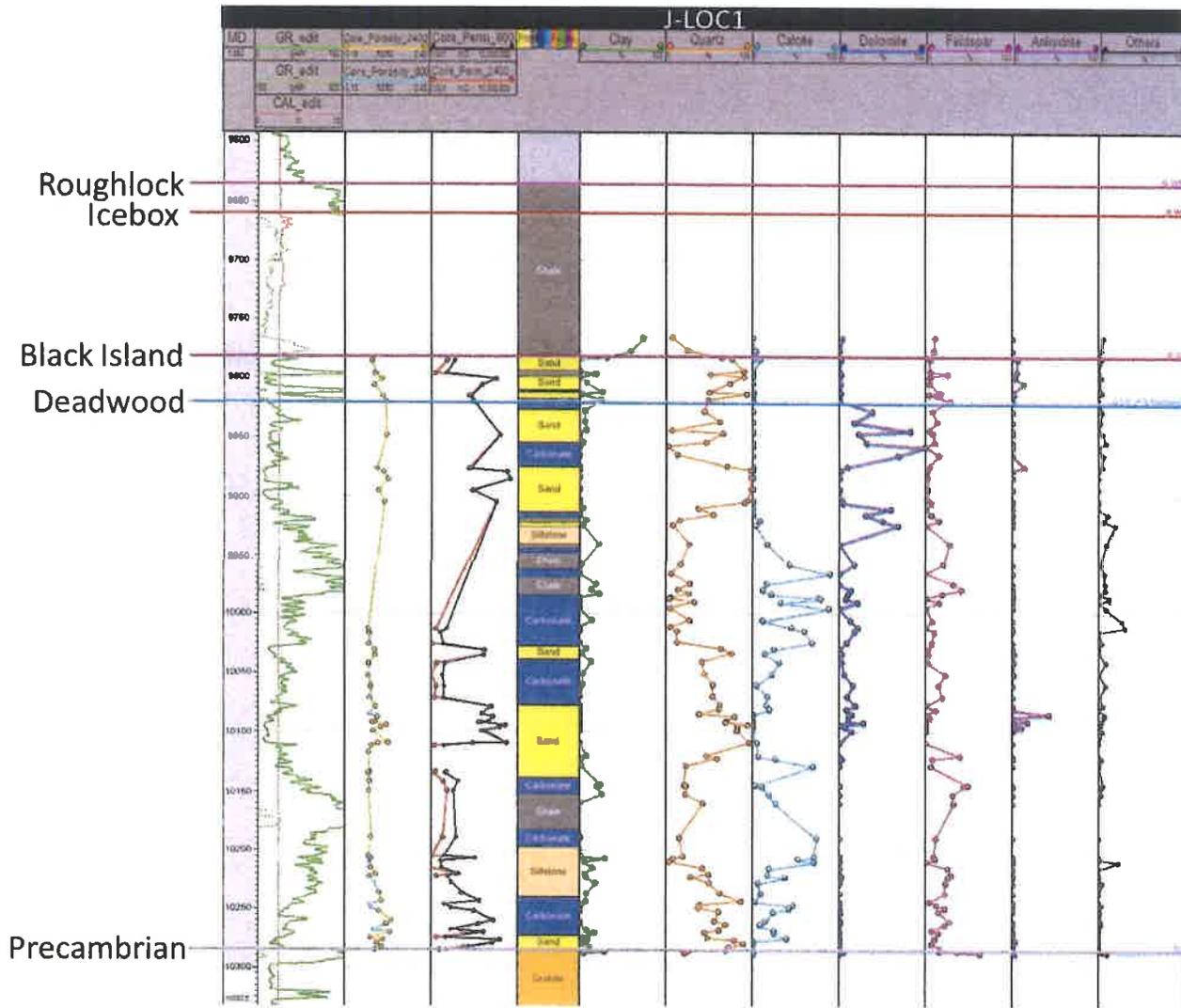


Figure 2-20. Laboratory-derived mineralogical characteristics of the Black Island and Deadwood Formations.

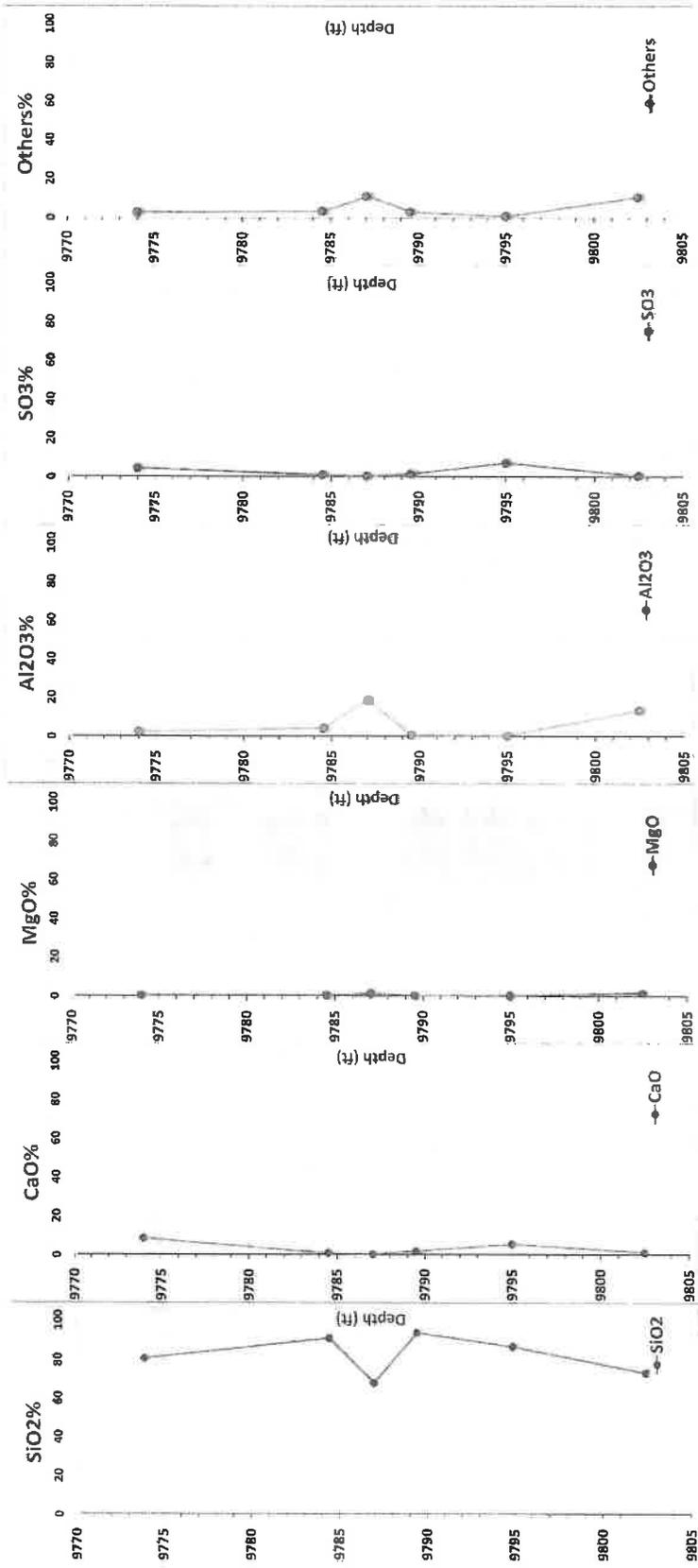


Figure 2-21a. XRF data from the Black Island Formation from J-LOC1.

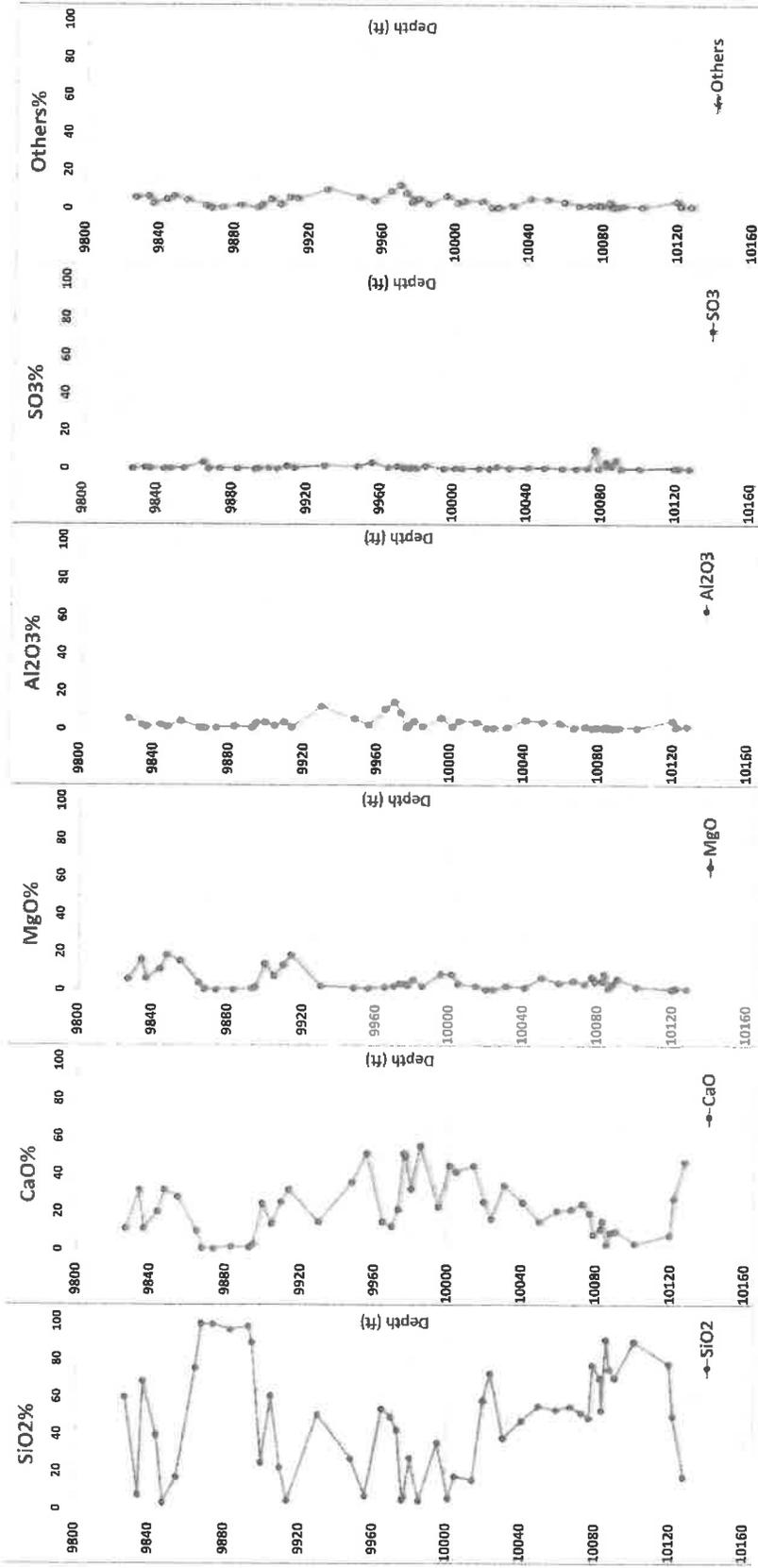


Figure 2-21b. XRF data from the Upper Deadwood Formation, including the C, D, and E members from J-LOC1.

2.3.4 Geochemical Information of Injection Zone

Geochemical simulation has been performed to calculate the effects of introducing the CO₂ stream into the injection zone. The effects have been found to be minor and not threatening to the geologic integrity of the storage system.

The injection zone, the Upper Deadwood sands and Black Island Formation, was investigated using the geochemical analysis option available in the Computer Modelling Group Ltd. (CMG) compositional simulation software package GEM. GEM is also the primary simulation software used for evaluation of the reservoir's dynamic behavior resulting from the expected CO₂ injection. The project's injection scenario was rerun with the geochemical analysis option included, and the differences were compared to the scenario that was run without the geochemical option included. Geochemical alteration effects were seen in the geochemistry case, as described below. However, these effects were not significant enough to cause meaningful change to storage reservoir performance or mechanical properties of the storage formation.

The geochemistry case was constructed using the injection case simulation inputs and assumptions as well as honoring the average mineralogical composition of the Deadwood Formation rock materials (94% of bulk reservoir volume) and average formation brine composition (6% of bulk reservoir volume). XRD data from the JLOC-1 well core samples were used to inform the mineralogical composition of the Deadwood Formation used in the geochemical modeling (Table 2-8). The ionic composition of the formation water is listed in Table 2-9. The injection stream composition remained the same as the injection case simulation, assumed as 100% CO₂. The injection stream is expected to be 99.9% CO₂. The other constituents represent 0.1% in the stream and likely include nitrogen (N₂) and water vapor (H₂O). However, 100% CO₂ was assumed for computational efficiency in the geochemical simulation to investigate rock and fluid interaction in the saline storage formation. N₂ is known to be an inert gas, and water is already in the saline storage formation and will have little to no impact on the geochemical reactions. In the injection stream, argon (Ar) and oxygen vapor (O₂) may also be present but in a negligible amount that would have no impact on geochemical reactions in the storage formation. The geochemistry case was run for the 20-year injection period followed by 94 years of postinjection shutdown and monitoring.

**Table 2-8. XRD Results for JLOC-1
Deadwood Formation Core Samples**

Mineral Data	Average %
Calcite	25.85
Dolomite	12.78
Quartz	32.94
Illite	4.7
K-Feldspar	8.54
Anhydrite	5.18
Ankerite	3.97
Other	6.04

Table 2-9. Deadwood Formation Water Ionic Composition, expressed as molality

Component	Molality
SO ₄ ²⁻	4.47E-3
K ⁺	0.03995
Na ⁺	3.58711
Ca ²⁺	0.17864
Mg ²⁺	0.02652
Fe ²⁺	3E-04
H ⁺	1.8836E-6
Cl ⁻	4.27731
HCO ₃ ⁻	0.03995
Al ³⁺	1E-05
SiO ₂ (aq)	1.0E-08

Figure 2-22 shows that reservoir performance results for the two cases are slightly different. As a result of geochemical reactions in the reservoir, there is an approximately 8% increase in cumulative injection potential. Wellhead injection pressure is slightly lower for the geochemistry case. Figure 2-23 shows the concentration of CO₂, in molality, in the reservoir after 20 years of injection. The pH of the reservoir brine changes in the vicinity of the CO₂ accumulation, as shown in Figure 2-24. The pH of the Deadwood native brine is 5.7 whereas the fluid pH declines to approximately 4.0 in the CO₂-flooded areas.

Figure 2-25 shows the mass of mineral dissolution and precipitation due to geochemical reactions in the model. Illite is the most prominent dissolution mineral, followed by anhydrite. Illite and anhydrite dissolution slows after Year 2042, the year in which injection ends. K-feldspar dissolves during the injection period but slowly begins to reprecipitate in the near-wellbore areas after injection. Calcite, quartz, and dolomite are the primary precipitation minerals. There is a small amount of net dissolution during the simulation period as somewhat larger quantities of minerals are dissolved rather than precipitated. Slow net dissolution continues after the injection period. Figures 2-26 and 2-27 provide an indication of the change in distribution of the mineral that has experienced the most dissolution (illite) and the mineral that has experienced the most precipitation (calcite), respectively. Considering the apparent net dissolution of minerals in the system, as indicated in Figure 2-25, there is an associated net increase in porosity of the affected area, as shown in Figure 2-28. However, the porosity change is small, less than 0.1% porosity units, equating to a maximum increase in average porosity from 6% to 6.1% after the 20-year injection period.

Results of the simulation show that geochemical processes will be at work in the Deadwood Formation during and after CO₂ injection. Mineral dissolution and some reprecipitation are expected to occur during the simulated time span of 114 years. Fluid pH will decrease in the area of the CO₂ accumulation from 5.7 to approximately 4.0, and there will be a slight net increase in system porosity. However, these changes create relatively small changes in reservoir performance parameters such as injection rate or wellhead injection pressure.

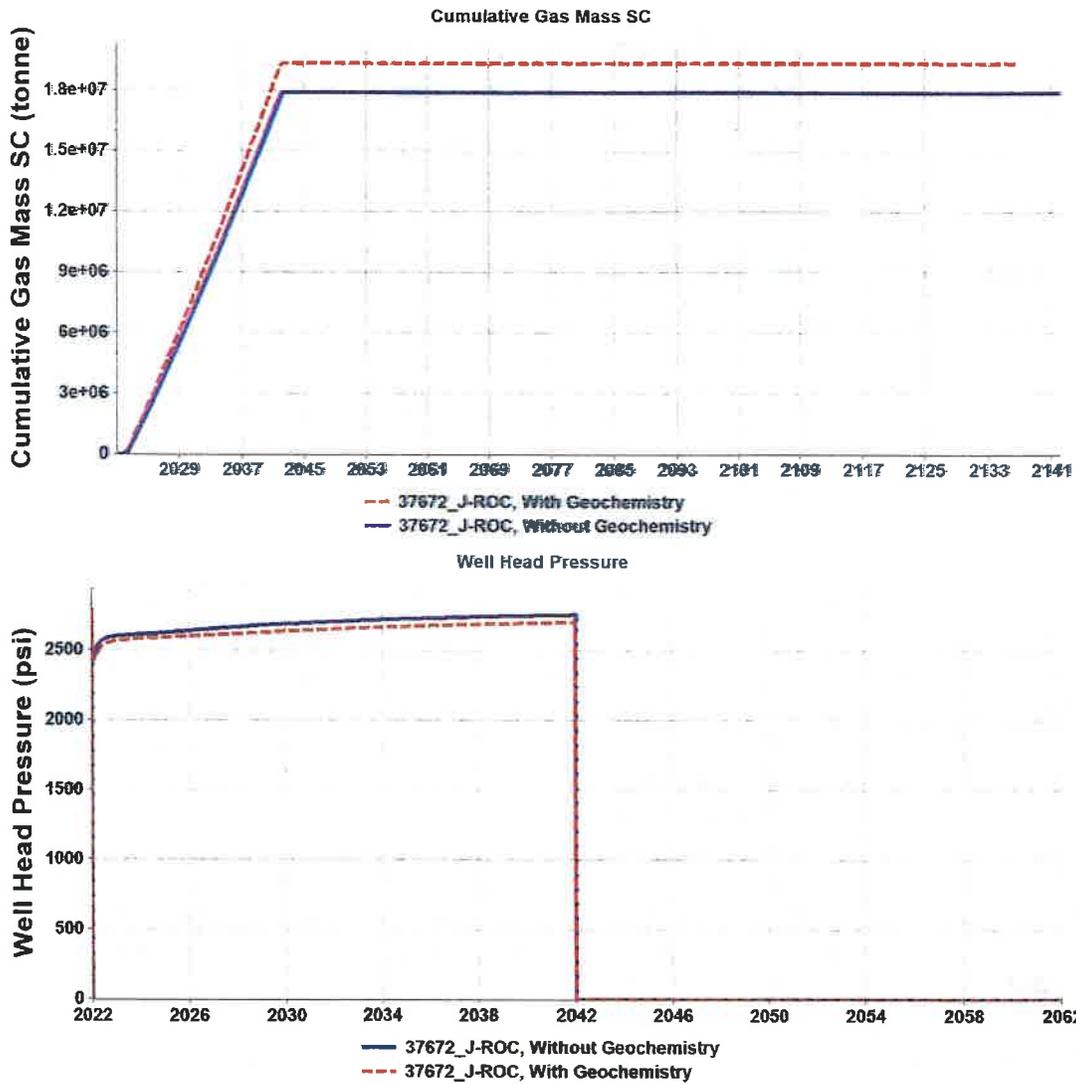


Figure 2-22. The upper graph shows cumulative injection vs. time. There is an increase in injection due to geochemical reactions. The lower graph shows wellhead injection pressure for the geochemistry case is slightly lower than for the injection case without geochemistry.

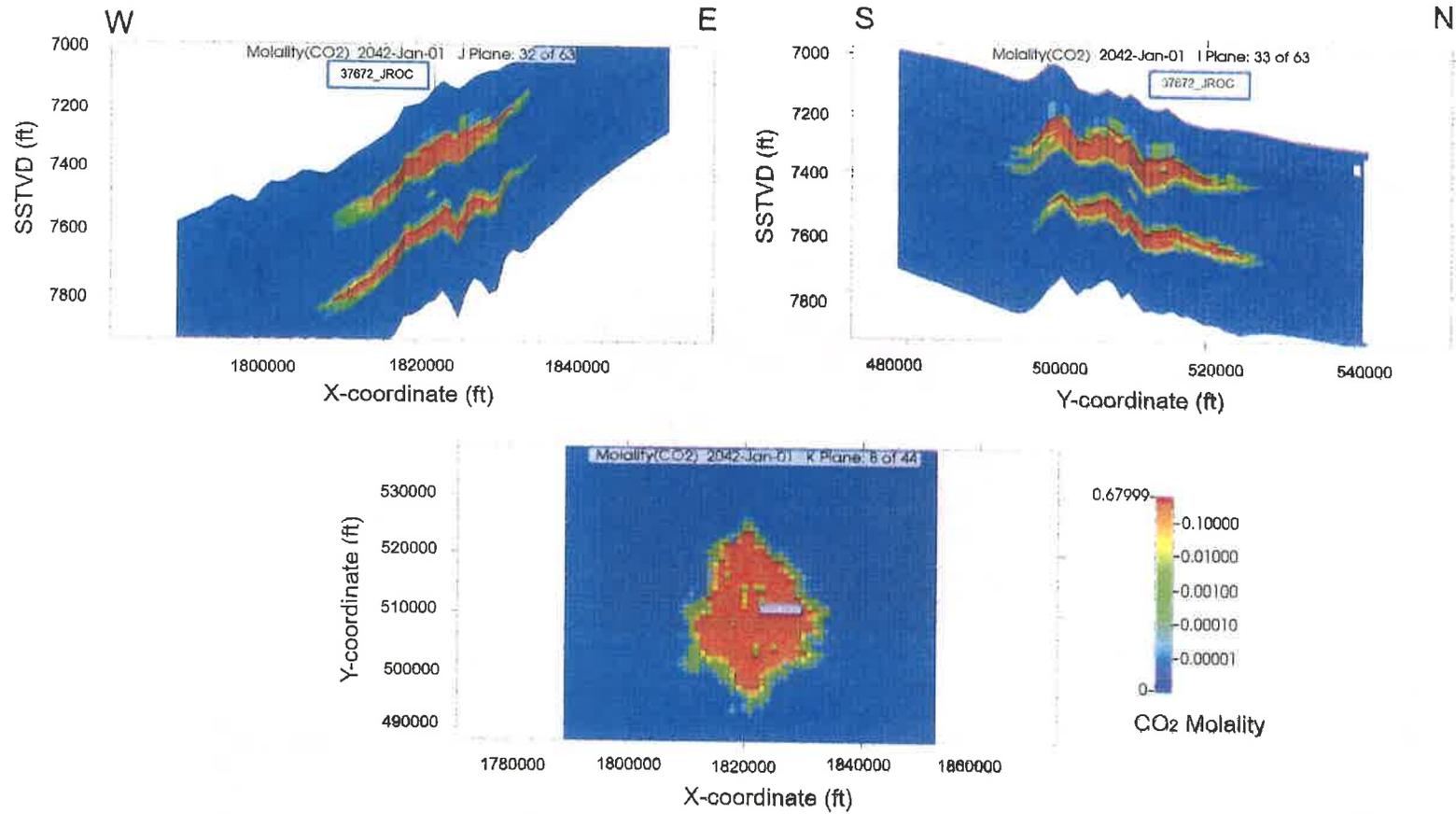


Figure 2-23. Geochemistry case simulation results after 20 years of injection showing the distribution of CO₂ molality. Upper images are west-east and north-south cross sections. Lower image is a planar view of Simulation Layer 8.

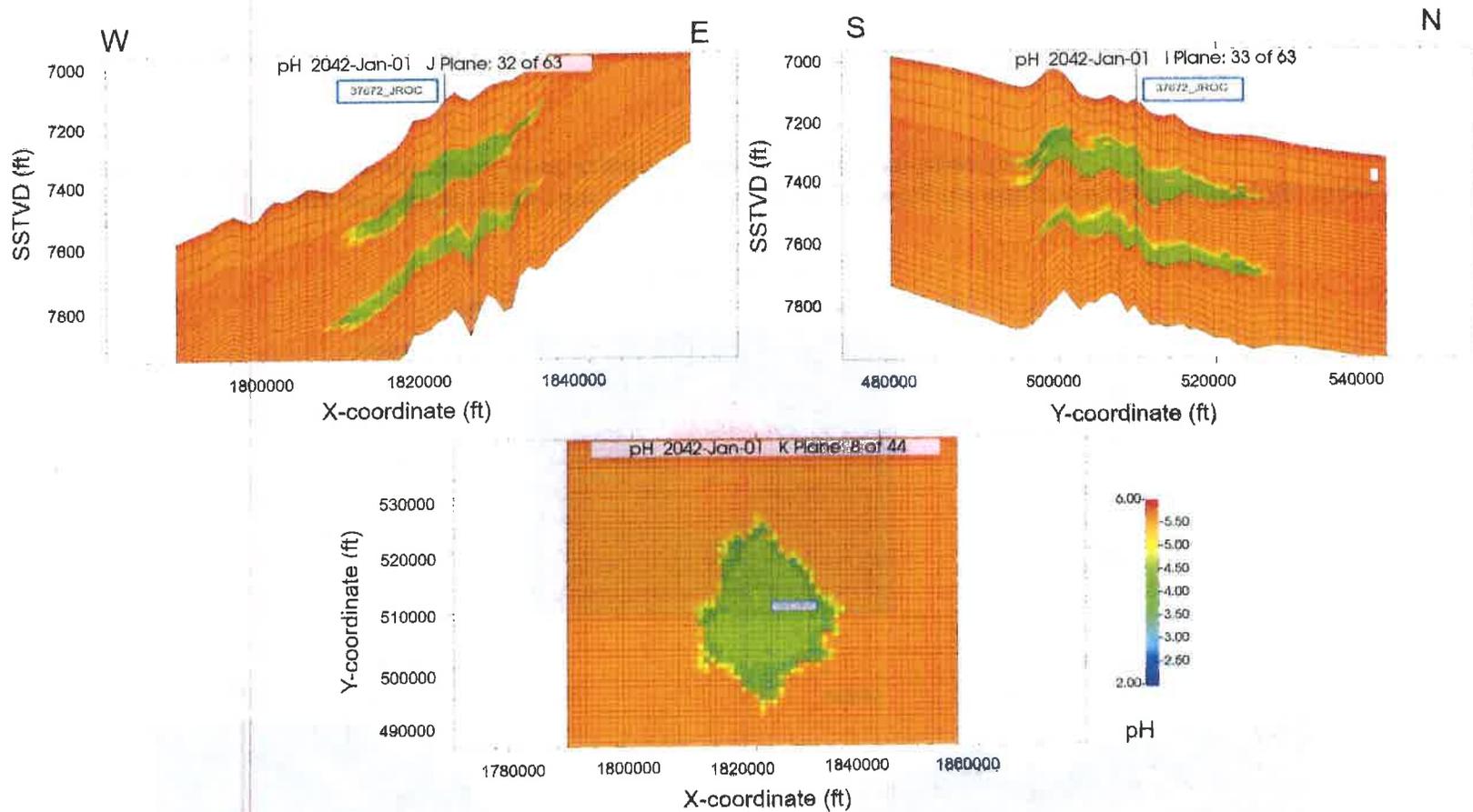


Figure 2-24. Geochemistry case simulation results after 20 years of injection showing the pH of formation brine.

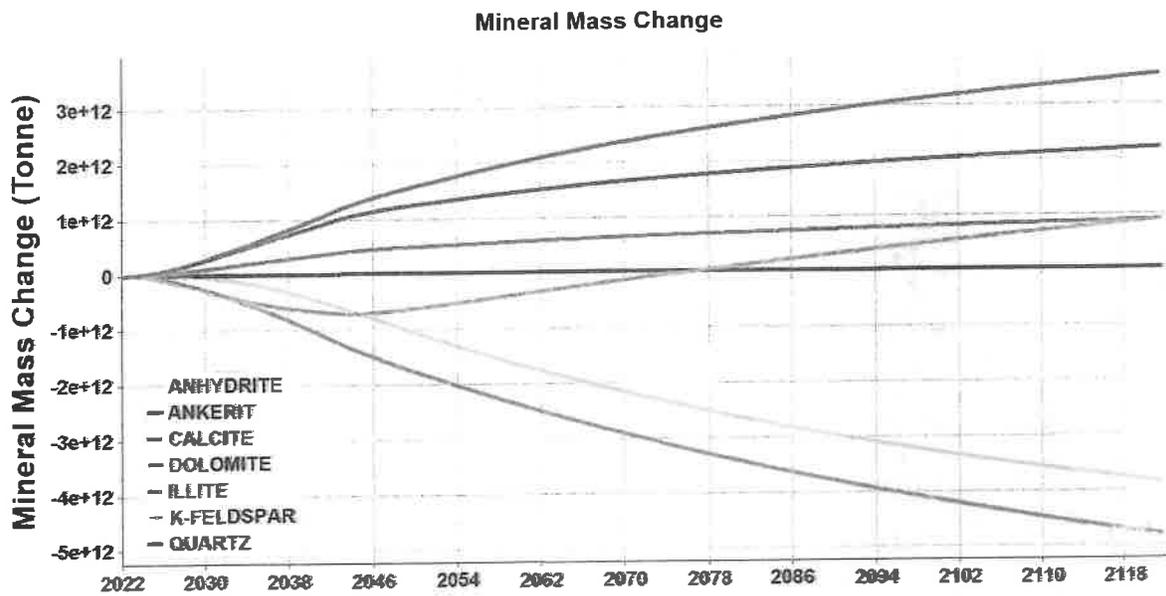


Figure 2-25. Dissolution and precipitation quantities of reservoir minerals due to CO₂ injection. Dissolution of illite and anhydrite with precipitation of calcite, quartz, and dolomite was observed. K-feldspar dissolves during the injection period but slowly begins to reprecipitate after injection.

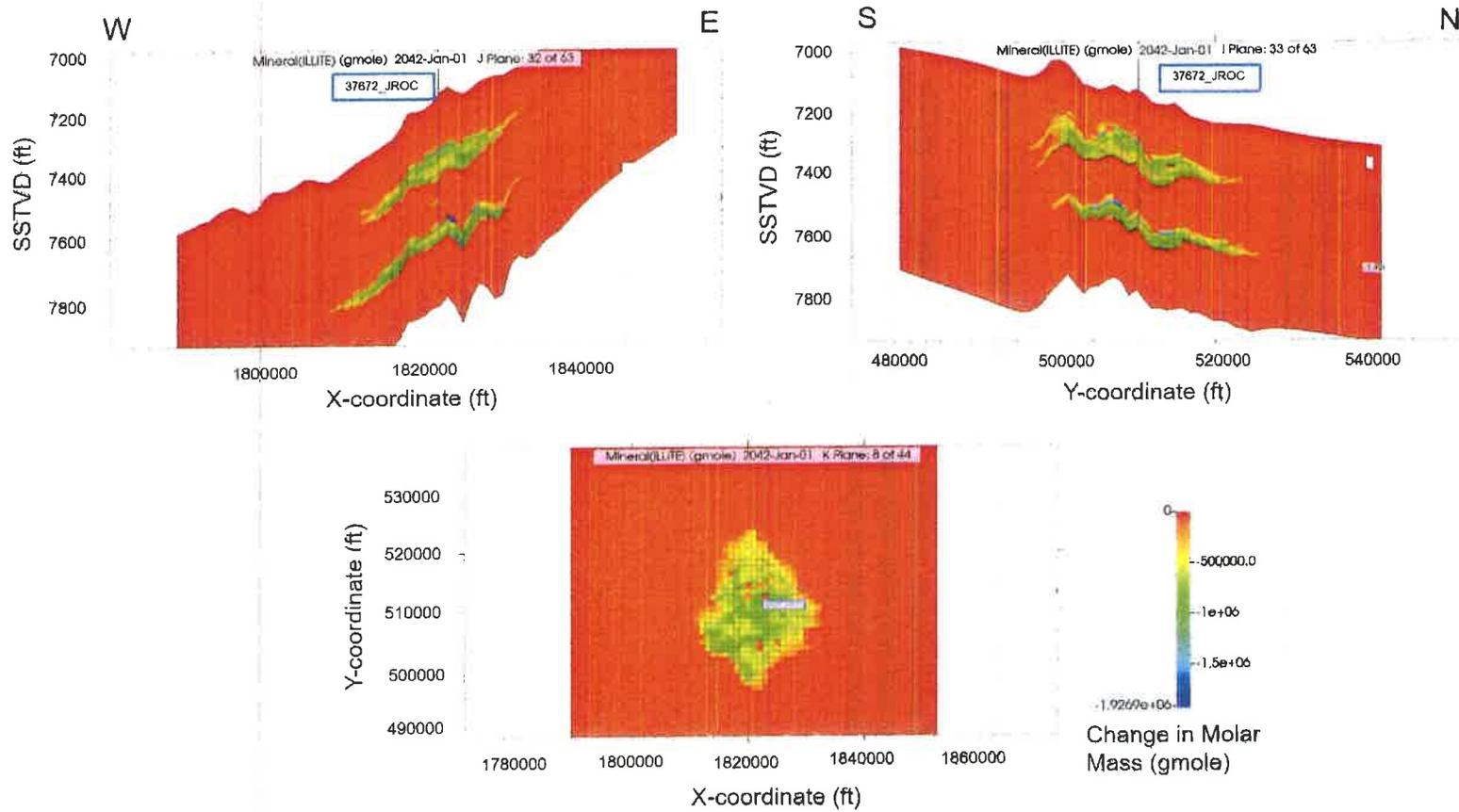


Figure 2-26. Molar distribution of illite, the most prominent dissolved mineral at the end of the injection period, shown in green. Compare to the molar CO_2 distribution in Figure 2-23.

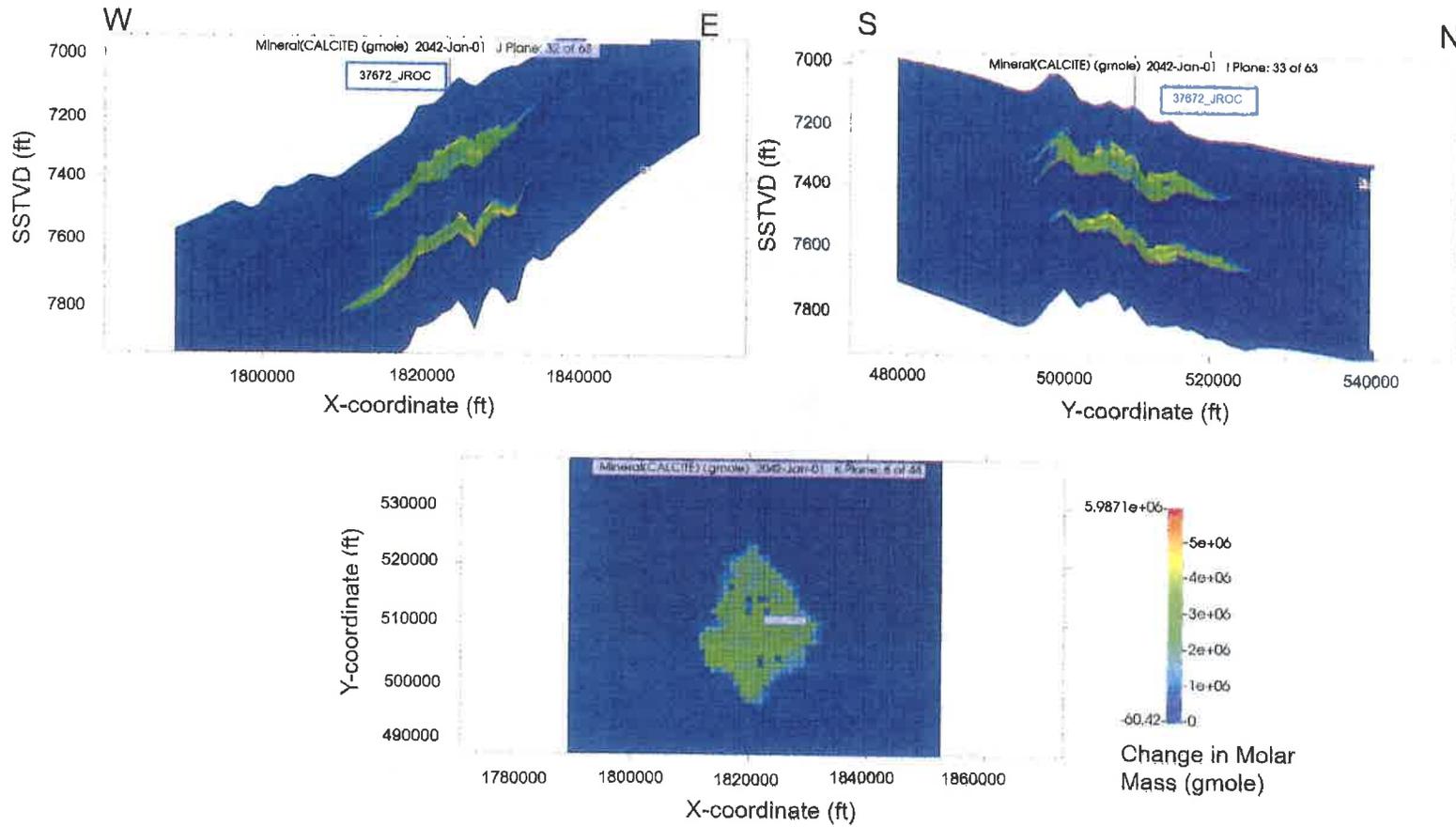


Figure 2-27. Molar distribution of calcite, the most prominent precipitated mineral at the end of the injection period. Compare to the molar CO₂ distribution in Figure 2-23.

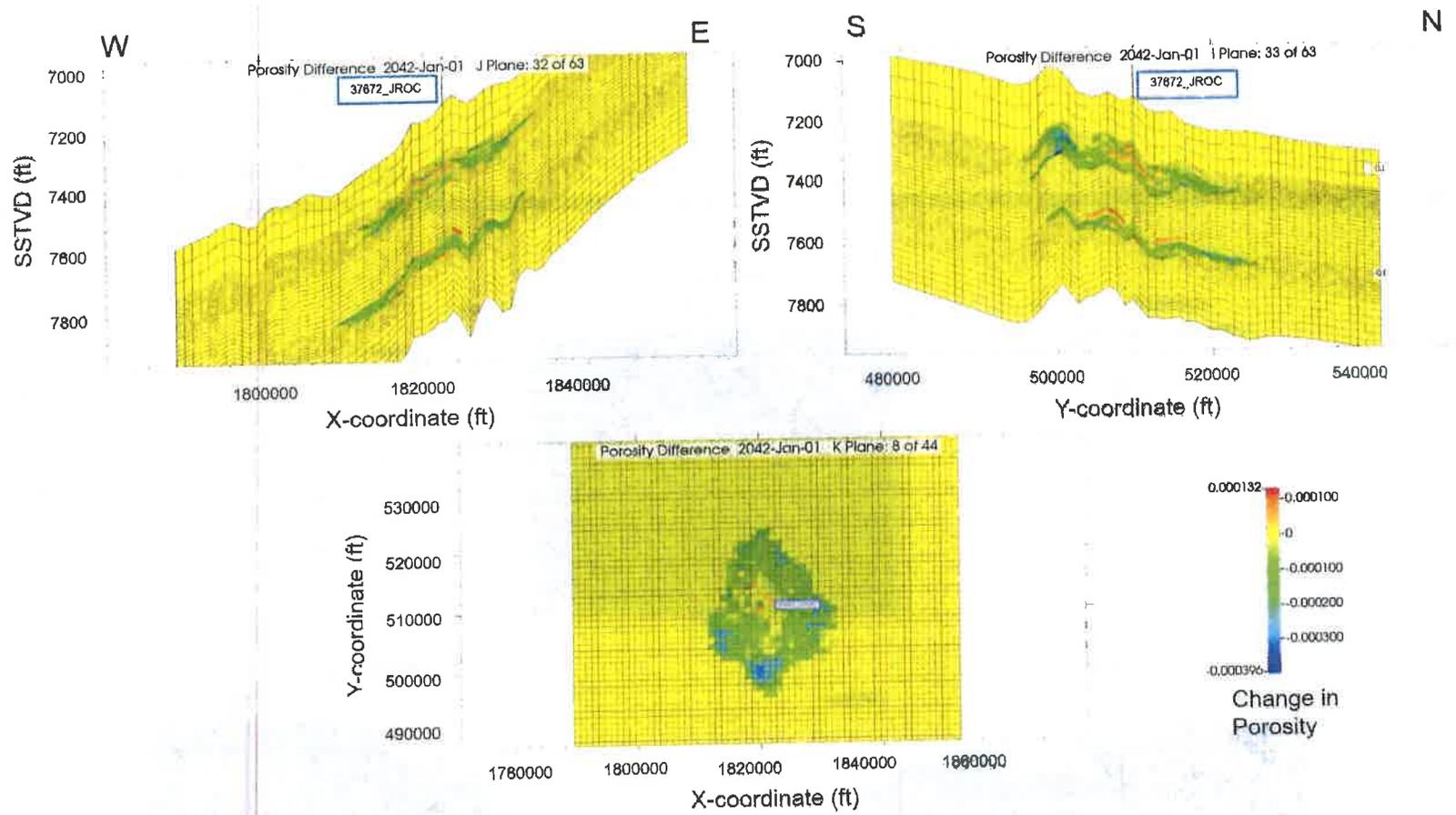


Figure 2-28. Change in porosity due to net geochemical dissolution after the 20-year injection period. Maximum porosity change is less than 0.1%. Compare to the molar CO₂ distribution in Figure 2-22.

2.4 Confining Zones

The confining zones for the Deadwood and Black Island Formations are the overlying Icebox Formation and underlying Deadwood B member shale (Figure 2-3, Table 2-10). All three units, the Icebox Formation, Deadwood B member shale, and Precambrian basement, consist of impermeable rock layers.

Table 2-10. Properties of Upper and Lower Confining Zones at the J-LOC1 Well

Confining Zone Properties	Upper Confining Zone	Lower Confining Zone
Formation Name	Icebox	Deadwood B member shale
Lithology	Shale	Shale
Formation Top Depth, ft	9,308	9,791
Thickness, ft	118	34
Porosity, % (core data)*	3.6***	2.0
Permeability, mD (core data)**	0.00002***	0.0103
Capillary Entry Pressure (CO ₂ /brine), psi	845	176****
Depth Below Lowest Identified USDW, ft	8,097	8,580

* Porosity values are reported as the arithmetic mean followed by the range of values in parentheses.

** Permeability values are reported as the geometric mean followed by the range of values in parentheses.

*** Porosity and permeability values derived from HPMI (high-pressure mercury injection) testing.

**** No shale samples in the Deadwood were tested. Value is for a sample from a sandy-shale interval in the Deadwood D member

2.4.1 Upper Confining Zone

In the Tundra SGS area, the Icebox consists of shale. This upper confining zone is laterally extensive across the project area (Figures 2-29 and 2-30) 9,308 ft below the land surface and 118 ft thick at the Tundra SGS site (Table 2-10 and Figure 2-31). The upper confining zone has sufficient areal extent and integrity to contain the injected CO₂. The upper confining zone is free of transmissive faults and fractures (Section 2.5). The contact between the underlying sandstone of the Black Island Formation is conformable and can be correlated across the project area. The transition from the Icebox to the Black Island is indicated by a relatively low GR, low neutron, high density, and low compressional sonic across the contact (Figure 2-32).

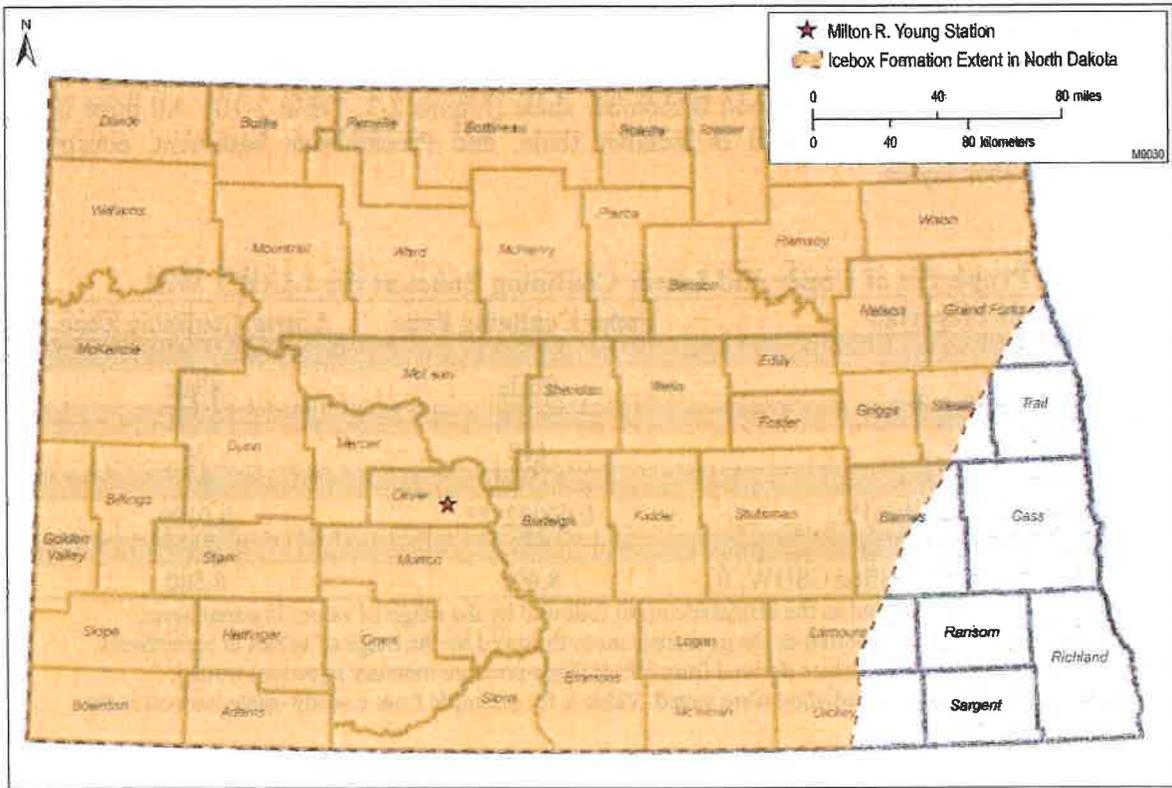


Figure 2-29. Areal extent of the Icebox Formation in western North Dakota (modified from Nesheim, 2012a).

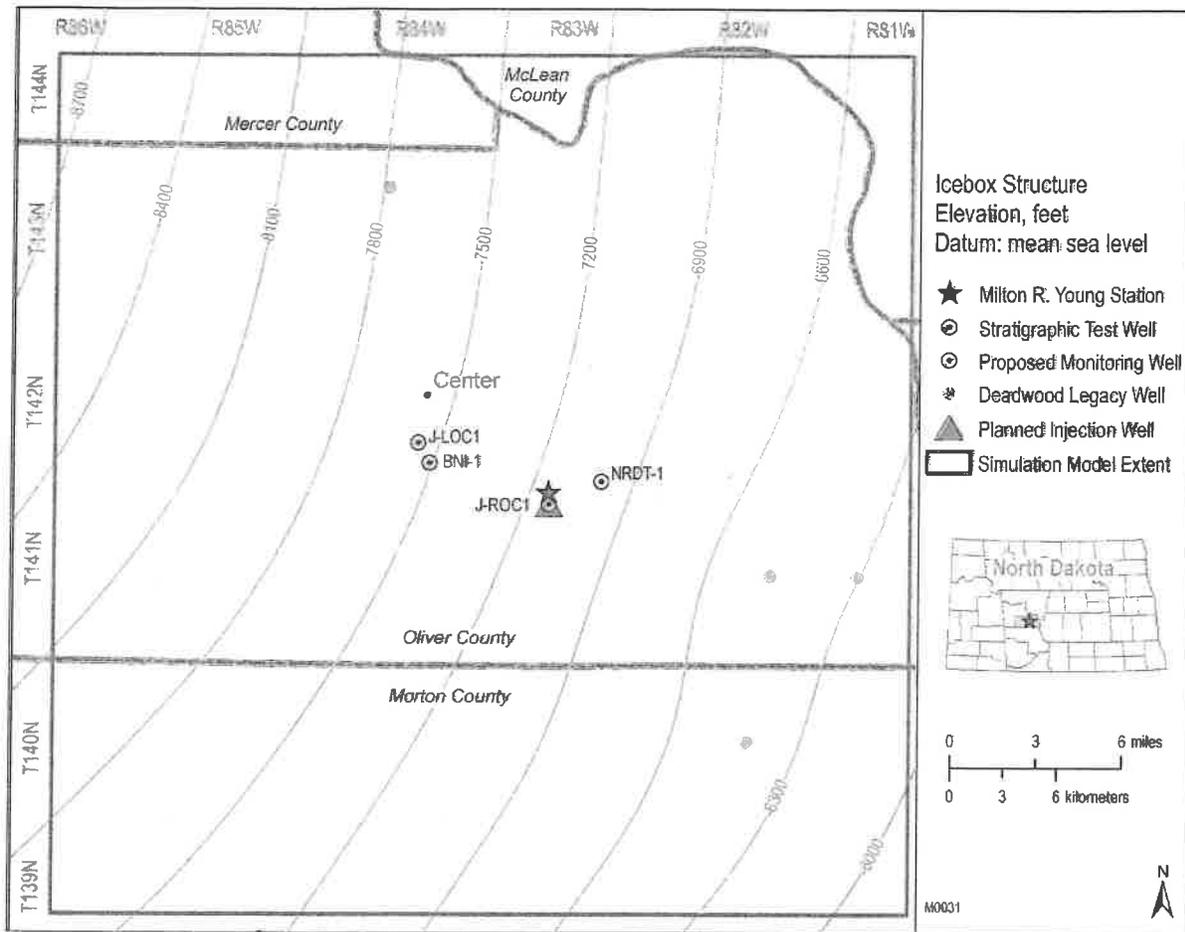


Figure 2-30. Structure map of the upper confining zone across the simulation model extent.

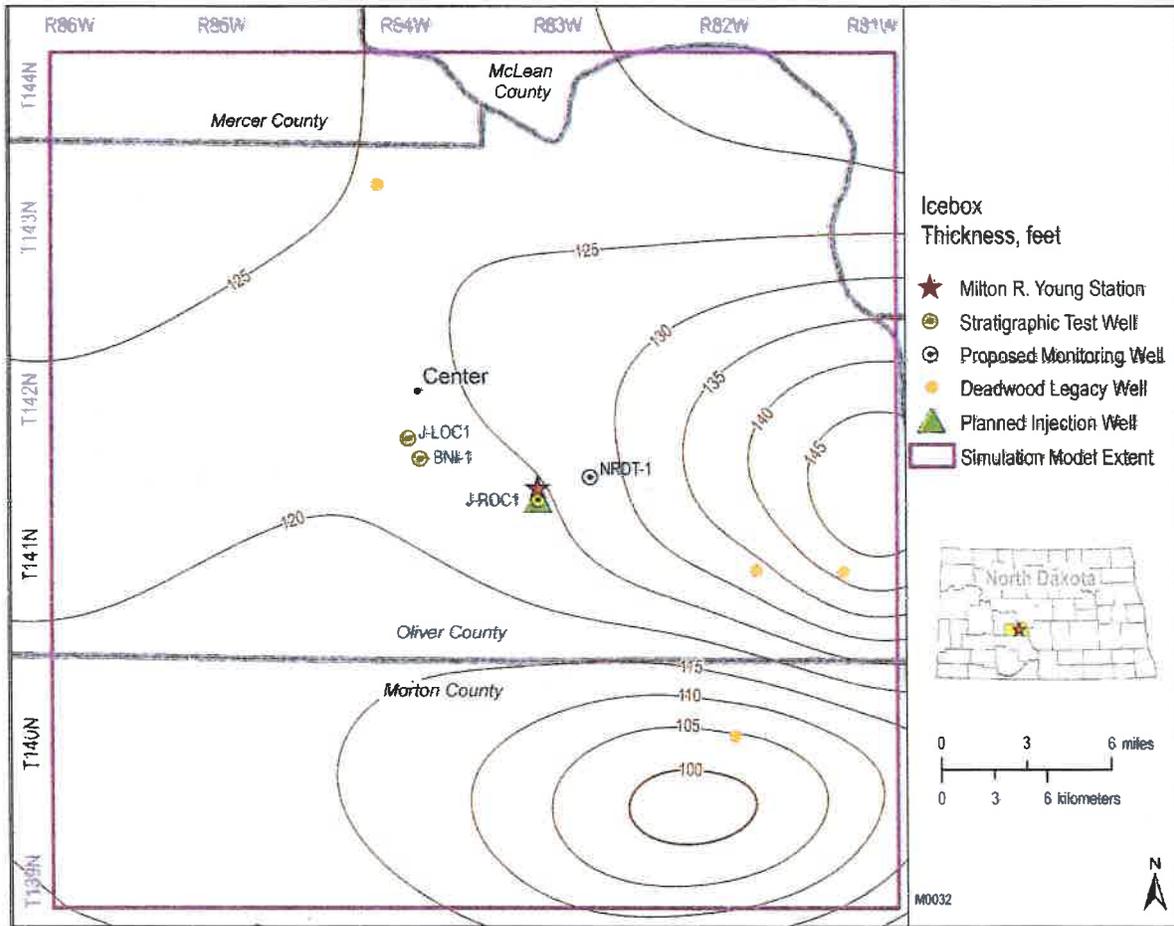


Figure 2-31. Isopach map of the upper confining zone across the simulation model extent.

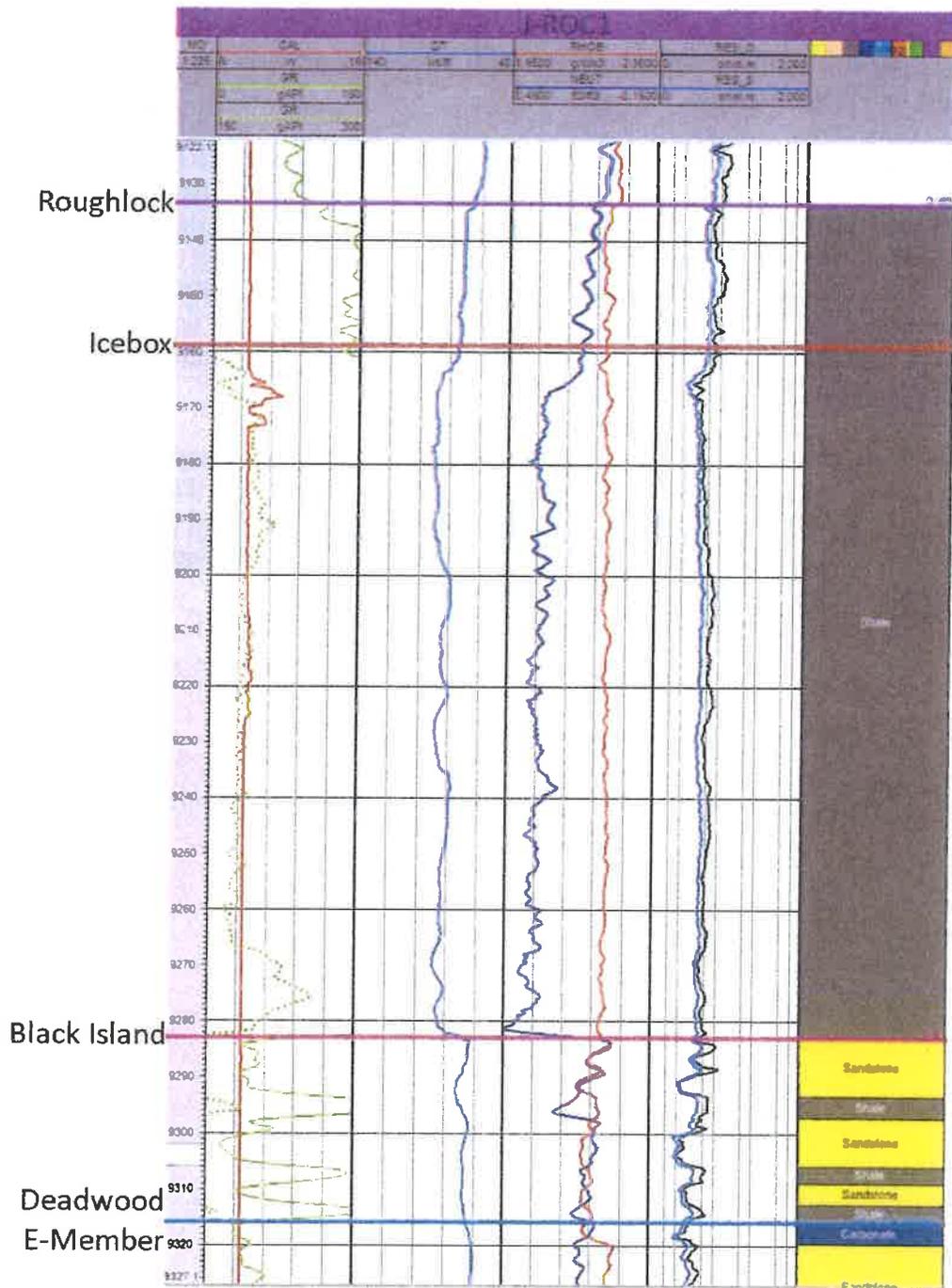


Figure 2-32. Well log display of the upper confining zone at the J-ROC1 well.

Microfracture in situ stress tests were performed using the MDT tool in the J-LOC1 wellbore. Microfracture stress tests were attempted in the J-ROC1 well; however, because of extremely unstable wellbore conditions, the MDT stress tool run was not performed after a near loss of the tool in the wellbore.

For the J-LOC1 well, in the Icebox Formation at 9,749.5 and 9,751.2 ft, the MDT tool was unable to cause a breakdown in the formation with an applied maximum injection pressure of 10,984.9 and 10,867.24 psi, respectively (Figures 2-33 and 2-34). The maximum injection pressure was limited by the dual-packer mechanical specifications having a set maximum differential pressure rating between the upper packer and hydrostatic pressure of 5,500 psi; see Appendix D, "Schlumberger Dual-Packer Module." The inability to break down the Icebox Formation at the two depths indicated that the formation is very tight competent and exhibits sufficient geologic integrity to contain the injected CO₂ stream.

The Icebox Formation was not suitable to collect competent core samples from the J-LOC1 well core for the purposes of porosity and permeability laboratory tests; the samples would crush in the equipment. The formation was found to be tight, and porosity and permeability estimates were derived from HPMI testing for one sample (Table 2-11). The lithology of the cored sections of the Icebox Formation is primarily shale, with minor pyrite.

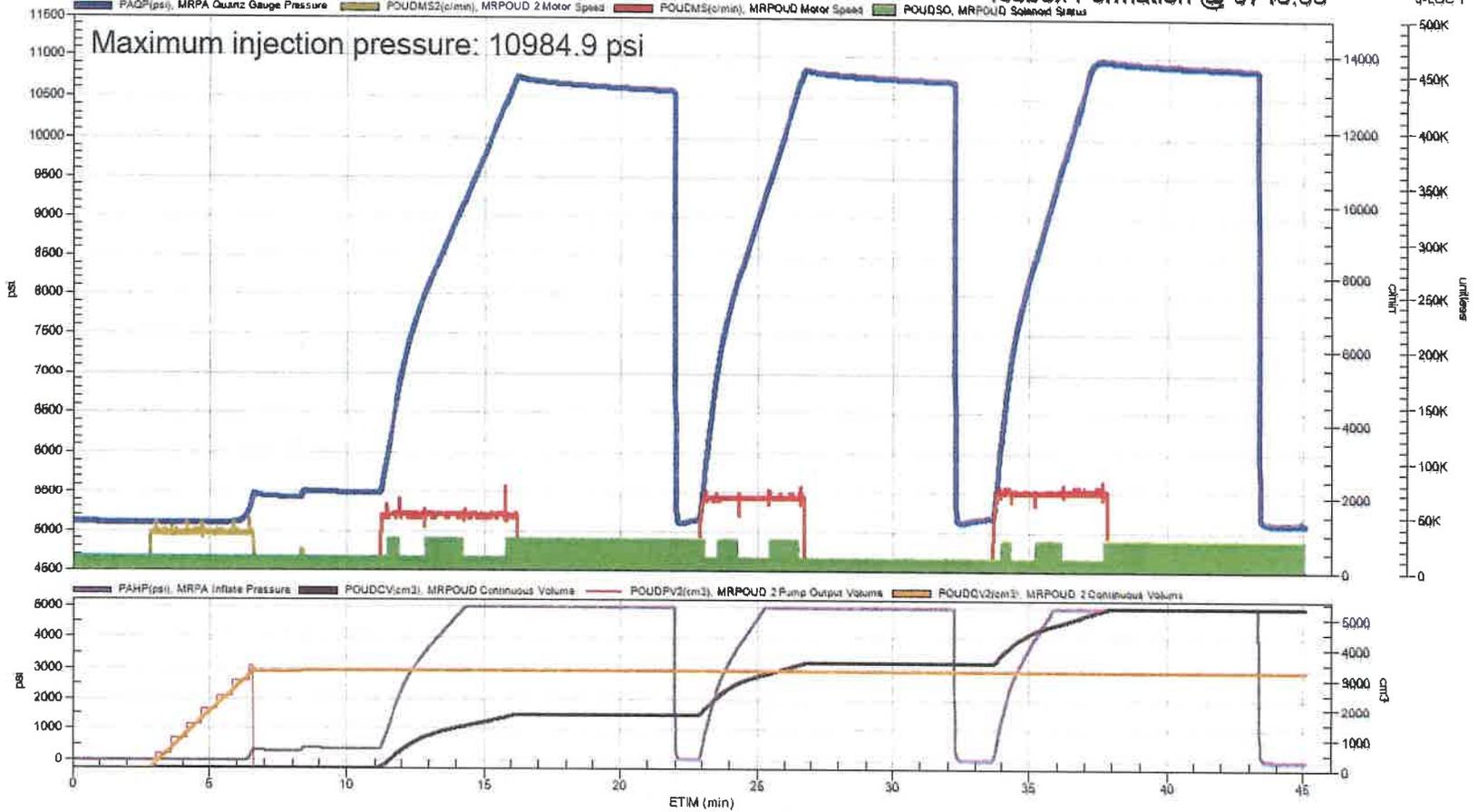
14-Jun-2020
ConPr_R02_Sla008_MDT_EDTA

All Probe Quartz Gauge Pressure and Pump Volume

Minnkota Power Cooperative, Inc.
MD: 9749.53 ft TVD: 9749.51 ft

J-LOC1_MDT Stress Test Icebox Formation @ 9749.53'

Wildcat
J-LQC 1



2-49

Figure 2-33. J-LOC1 Icebox Formation MDT microfracture in situ stress test pump cycle graph at 9,749.5 ft.

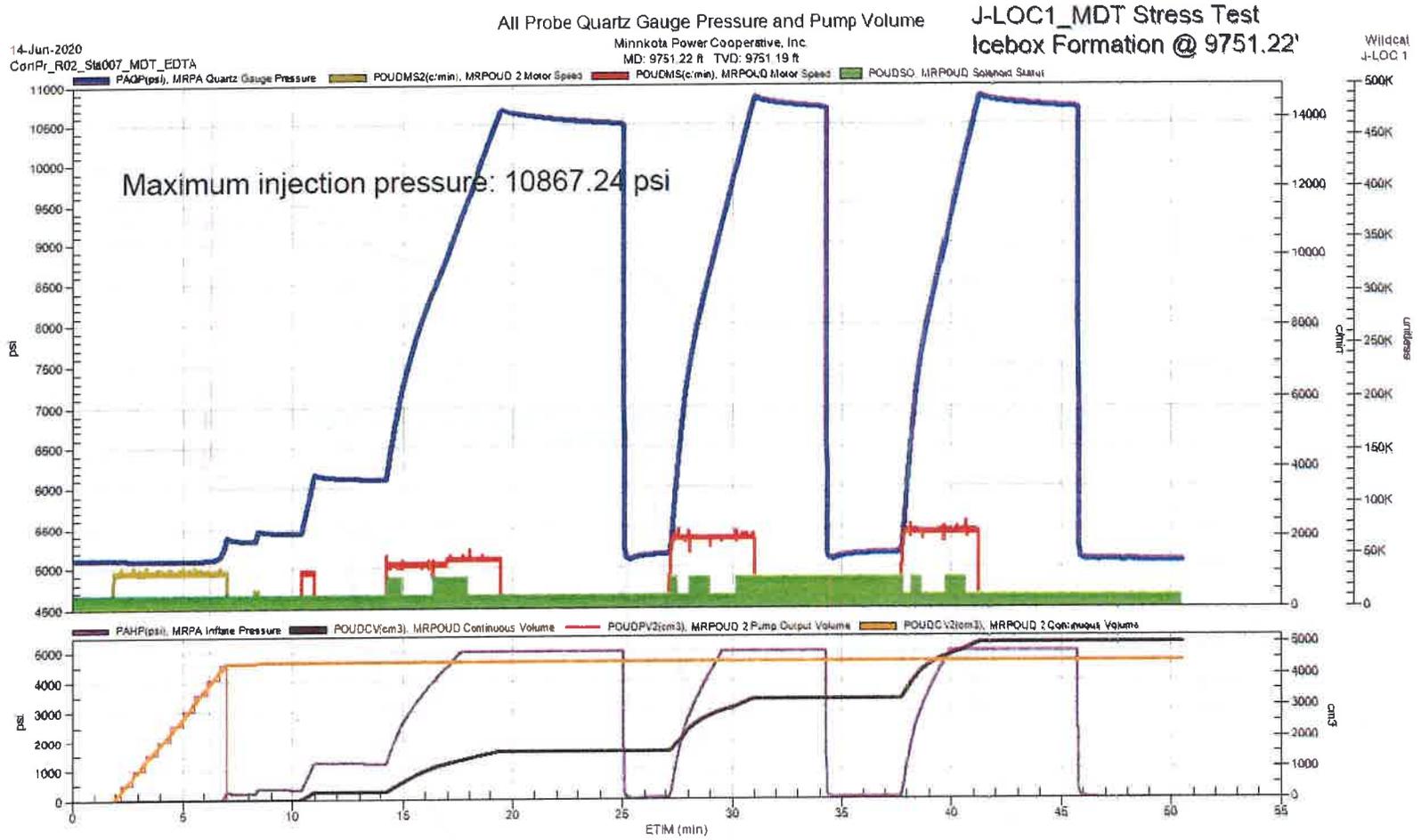


Figure 2-34. J-LOC1 Icebox Formation MDT microfracture in situ stress test pump cycle graph at 9,751.2 ft.

Table 2-11. Icebox Core Sample Porosity and Permeability from J-LOC1

Sample Depth, ft	Porosity, %	Permeability, mD
9,773	—	—
9,767	3.6*	0.000020*
9,756	—	—
Range	3.6*	0.000020*

* Derived from HPMI.

2.4.1.1 Mineralogy

Thin-section investigation shows that the Icebox Formation is primarily shale. Thin sections were created from the base of the Icebox and the shales present in the Black Island Formation. The shales present in the Black Island Formation have characteristics similar to the shales of the Icebox Formation. The mineral components present are clay, quartz, feldspar, and iron oxides. The quartz grains are always surrounded by a clay matrix. The porosity and permeability measurements could not be performed because of the fissility of the rock. The porosity was estimated from HPMI analysis and equaled 3.6%. Log interpretations (Figure 2-31) and visual inspection of the collected core validate consistent mineral assemblage within the Icebox and Black Island Formations.

XRD data from the J-LOC1 well core supported facies interpretations from core descriptions and thin-section analysis. The Icebox Formation comprises clay, quartz, feldspar, and iron oxides.

XRF analysis of the Icebox Formation identified the major chemical constituents to be dominated by SiO₂ (53%), SO₃ (1.6%), CaO (0.26%), Al₂O₃ (24%), and MgO (1.9%), correlating well with the silicate- and aluminum-rich mineralogy determined by XRD (Table 2-12). This correlates with XRD, core description, and thin-section analysis.

Table 2-12. XRF Data for the Icebox Formation from the J-LOC1 Well

Sample Depth			
9,756 ft		9,767 ft	
Component	Percentage	Component	Percentage
SiO ₂	50.51	SiO ₂	57.01
Al ₂ O ₃	26.11	Al ₂ O ₃	22.55
SO ₃	3.03	SO ₃	0.30
CaO	0.16	CaO	0.36
MgO	1.83	MgO	1.97
Other	15.89	Other	15.18

2.4.1.2 Geochemical Interaction, Icebox Formation

Geochemical simulation using PHREEQC geochemical software was performed to calculate the potential effects of injected CO₂ on the Icebox Formation, the primary confining zone for the Deadwood Formation. A vertically oriented 1D simulation was created using a stack of 1-meter grid cells where the formation was exposed to CO₂ at the bottom boundary of the simulation and allowed to enter the system by molecular diffusion processes. The results were calculated at grid cell centers located at 0.5, 1.5, and 2.5 meters above the cap rock–CO₂ exposure boundary. The mineralogical composition of the Icebox was honored (Table 2-13). The formation brine composition was assumed to be the same as the known composition from the Deadwood injection zone below (Table 2-14). The injection stream composition was as described by Minnkota Power Cooperative (Minnkota) (Table 2-15). Three different exposure levels, expressed in moles per year, of the CO₂ stream to the cap rock (1.15, 2.3, and 4.5 moles/yr) were used. These values are considerably higher than the expected actual exposure levels. This overestimate was done to ensure that the degree and pace of geochemical change would not be underestimated. These three simulations were run for 45 years to represent 20 years of injection plus 25 years postinjection. The simulations were performed at reservoir pressure and temperature conditions.

Table 2-13. Mineral Composition of the Icebox Formation Derived from XRD Analysis of JLOC-1 Core Samples (9773 ft MD)

Minerals, wt%	
Illite	18.2
Kaolinite	5.7
Chlorite	4.2
Montmorillonite	3.1
K-Feldspar	8.1
Quartz	59.3
Calcite	0.6
Pyrite	0.8

Table 2-14. Formation Water Chemistry from Deadwood Formation Fluid Samples from JLOC-1

pH	6	Total Dissolved Solids	256,000 mg/L
Total Alkalinity	72 mg/L CaCO ₃	Calcium	8,610 mg/L
Bicarbonate	72 mg/L CaCO ₃	Magnesium	1,210 mg/L
Carbonate	<20 mg/L CaCO ₃	Sodium	87,000 mg/L
Hydroxide	<20 mg/L CaCO ₃	Potassium	2020 mg/L
Total Organic Carbon	14 mg/L	Iron	22.2 mg/L
Sulfate	491 mg/L	Manganese	2.85 mg/L
Chloride	17,500 mg/L	Barium	<5 mg/L
Nitrate	<0.1 mg/L	Strontium	0.32 mg/L

Table 2-15. Injection Stream Composition

Component Flows	ppmv	mol%
CO ₂	804,195	0.999
H ₂ O	632	7.85E-04
N ₂	163	2.02E-04
O ₂	6	7.45E-06
H ₂	0	0.00E+00
Ar	4	4.97E-06

The results showed relatively minor geochemical processes at work. Figures 2-35, 2-36, and 2-37 show results from the most extreme exposure case. Figure 2-35 shows change in fluid pH over time as CO₂ enters the system. For the cell at the CO₂ interface, C1, the pH declines to and stabilizes at a level of 4.9. For the cell occupying the space 1 to 2 meters into the cap rock, C2, the pH only begins to change after Year 8. The pH is unaffected in Cell C3. Figure 2-36 shows change in mineral dissolution and precipitation in grams per cubic meter of rock. Dashed lines are for Cell C1, solid lines that are seen in the figure are from Cell C2, 1.0 to 2.0 meters into the cap rock. Any effects in Cell C3 are too small to represent at this scale. In Cell C1, K-feldspar is the primary dissolution mineral, which is primarily replaced by precipitation of illite, quartz, and montmorillonite. Similar, but lesser, effects are seen in Cell C2. Figure 2-37 shows change in porosity of the Icebox cap rock. During an initial model stabilization period, Cell C1 experiences an increase in porosity due to K-feldspar dissolution. However, the porosity gradually returns to its initial condition by Year 10. As the porosity scale shows, these changes are small, less than 0.0013 porosity units. Cells C2 and C3 experience no significant change in porosity during the 45 years of the simulation. The small net porosity changes from dissolution and precipitation in Cells C1 and C2, with essentially zero observed effect on Cell C3, suggest that geochemical change from exposure to CO₂ is very minor and will not cause substantive deterioration of the Icebox cap rock.

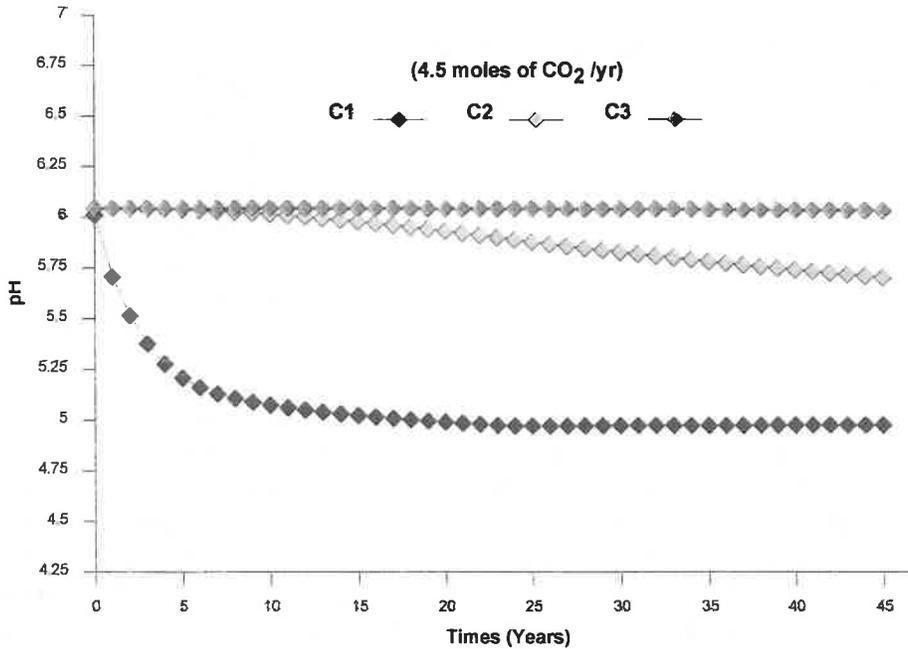


Figure 2-35. Change in fluid pH vs. time. Red line shows pH for the center of Cell C1 at 0.5 meters above the base of the Icebox cap rock. Yellow line shows Cell C2 at 1.5 meters above the cap rock base. Green line shows Cell C3 at 2.5 meters above the cap rock base.

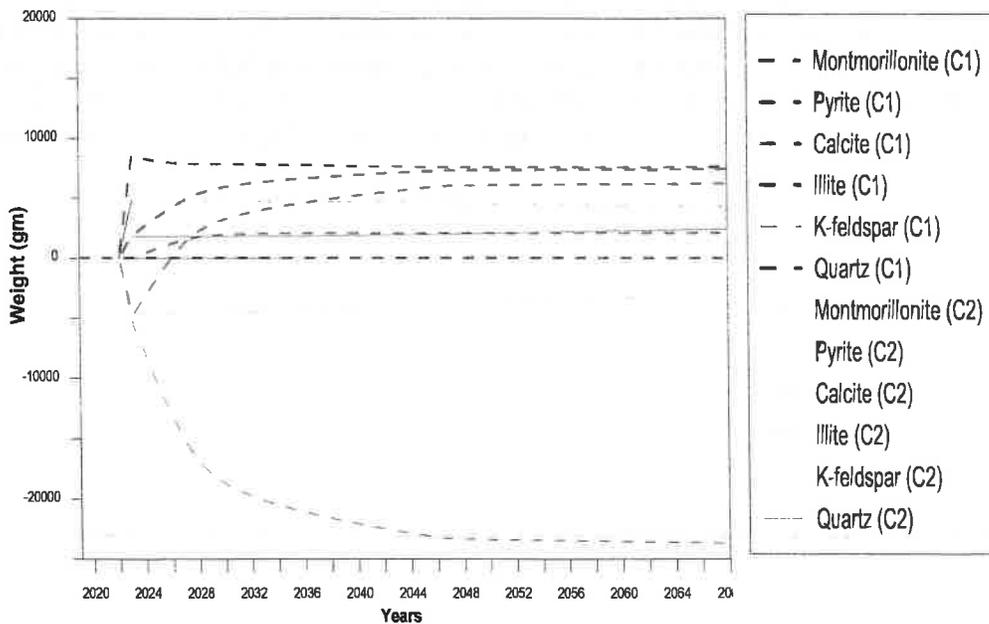


Figure 2-36. Dissolution and precipitation of minerals in the Icebox cap rock. Dashed lines show results calculated for Cell C1 at 0.5 meters above the cap rock base. Solid lines show results for Cell C2 at 1.5 meters above the cap rock base. Results from Cell C3 at 2.5 meters above the caprock base are not shown as they are too small to be seen at this scale.

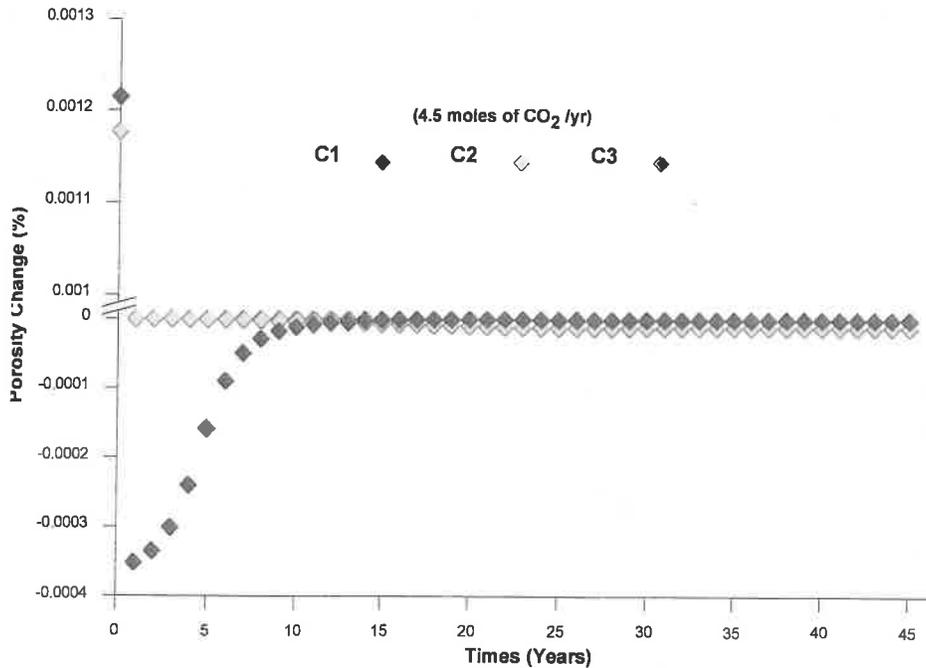


Figure 2-37. Change in percent porosity of the Icebox cap rock. Red line shows porosity change calculated for Cell C1 at 0.5 meters above the cap rock base. Yellow line shows Cell C2 at 1.5 meters above the cap rock base. Green line shows Cell C3 at 2.5 meters above the cap rock base. Long-term change in porosity is minimal.

2.4.2 Additional Overlying Confining Zones

Several other formations provide additional confinement above the Icebox. Impermeable rocks above the primary seal include the Roughlock Formation and the Red River D member, which make up the first additional group of confining formations (Table 2-16). Together with the Icebox, these formations are 612 ft thick and will isolate the Deadwood/Black Island Formations fluids from migrating upward into the next permeable interval, the Red River A, B, and C members (see Figure 2-38). Above the Red River Formation, >1,000 ft of impermeable rocks act as an additional seal between the Red River and Broom Creek, the next proposed storage complex, 876 ft of impermeable rocks separate the Broom Creek from the Inyan Kara and an additional 2,545 ft of impermeable rocks separates the Inyan Kara and the lowermost USDW, the Fox Hills Formation (see Figure 2-39). Confining layers above the Inyan Kara include the Skull Creek, Newcastle, Mowry, Greenhorn, and Pierre Formations (Table 2-16).

No known transmissible faults are within these confining systems in the project area. These formations between the Deadwood, Broom Creek, and Inyan Kara and between the Inyan Kara and lowest USDW have demonstrated the ability to prevent the vertical migration of fluids throughout geologic time and are recognized as impermeable flow barriers in the Williston Basin (Downey, 1986; Downey and Dinwiddie, 1988).

Table 2-16. Description of Zones of Confinement above the Immediate Upper Confining Zone (data based on the J-ROC1 well)

Name of Formation	Lithology	Formation Top Depth, ft	Thickness, ft	Depth below Lowest Identified USDW, ft
Pierre	Shale	1,150	1862	0
Greenhorn	Shale	3,012	391	1,862
Mowry	Shale	3,403	56	2,253
Skull Creek	Shale	3,458	235	2,308
Swift	Shale	3,864	473	2,714
Rierdon	Shale	4,337	147	3,187
Piper (Kline member)	Limestone	4,484	110	3,334
Piper (Picard)	Shale	4,594	91	3,444
Opeche	Shale/mudstone	4,685	55	3,535
Amsden	Dolostone/anhydrite	4,974	247	3,824
Kibbey Lime	Limestone	5,384	31	4,234
Charles	Limestone/anhydrite	5,526	147	4,376
Bakken	Shale	6,926	10	5,776
Birdbear	Limestone	7,075	74	5,925
Duperow	Limestone/dolostone	7,149	272	5,999
Souris River	Dolostone/limestone	7,421	175	6,271
Dawson Bay	Dolostone	7,596	729	6,446
Gunton	Dolostone/limestone	8,325	39	7,175
Stoughton	Shale/limestone	8,364	91	7,214
Lower Red River	Limestone	8,645	488	7,495
Roughlock	Shale/limestone	9,133	25	7,983

Carbonates of the Red River A, B, and C members comprise the first unit with relatively high porosity and permeability above the injection zone and primary sealing formation. The Red River represents the most likely candidate to act as an overlying pressure dissipation zone. The depth to the Red River Formation in the project area is approximately 8,438 ft, and the formation itself is about 450 ft thick. In the unlikely event of out-of-zone migration through the primary and secondary sealing formations, CO₂ would become trapped in the Red River Formation.

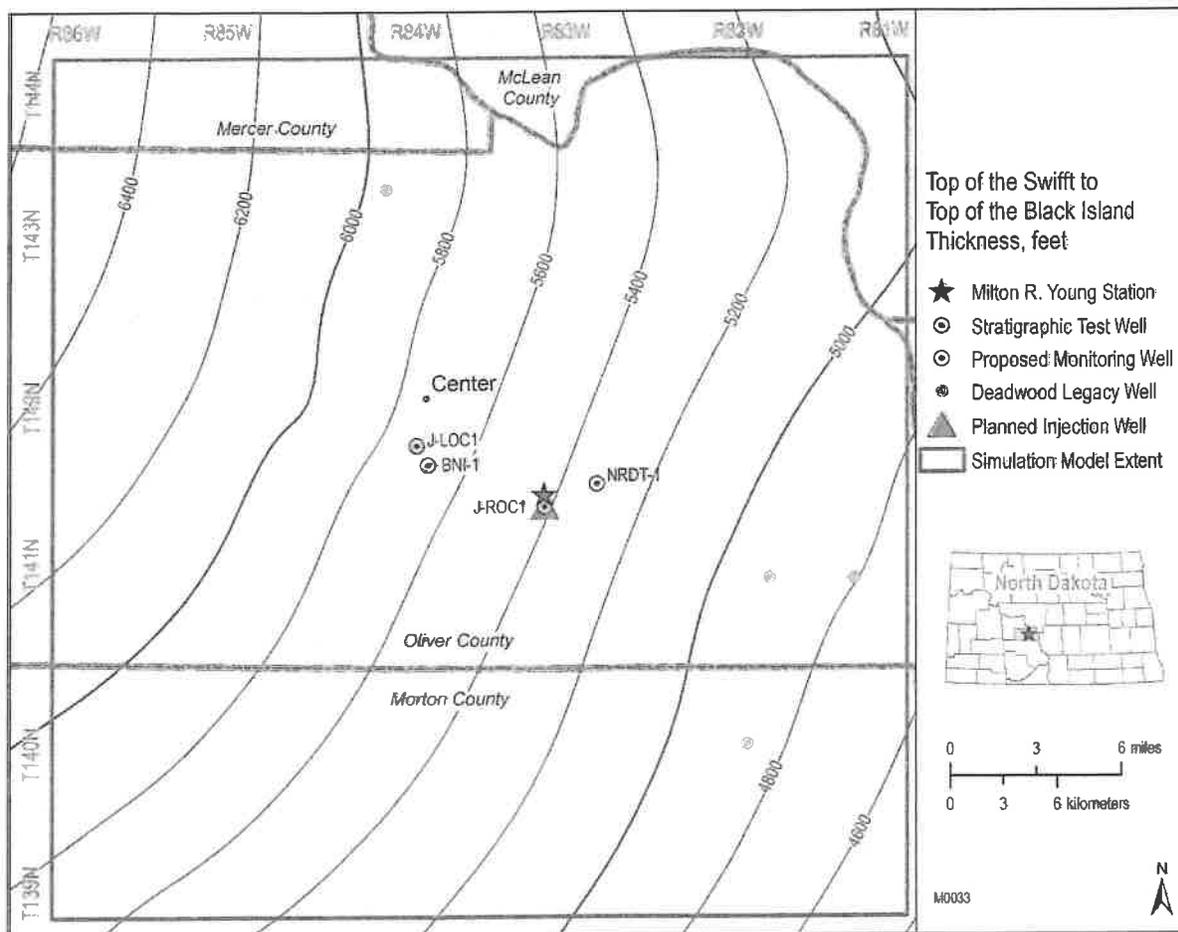


Figure 2-38. Isopach map of the interval between the top of the Black Island Formation and the top of the Swift Formation. This interval represents the primary and secondary confinement zones.

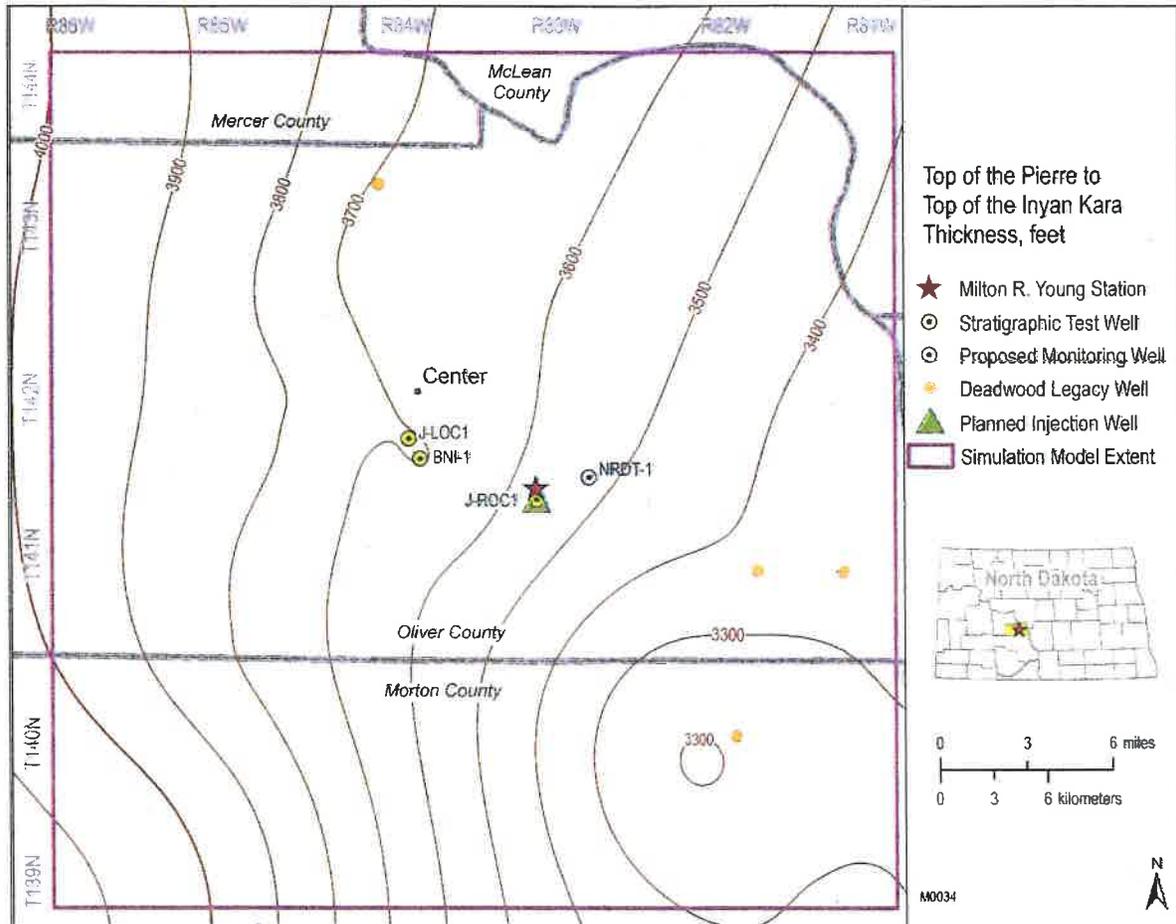


Figure 2-39. Isopach map of the interval between the top of the Inyan Kara Formation and the top of the Pierre Formation. This interval represents the tertiary confinement zone.

2.4.3 Lower Confining Zone

The lower confining zone of the storage complex is the Deadwood B member shale. The Deadwood B member shale consists predominantly of shale with a consistent and correlative package of higher GR, moderate resistivity, higher neutron, moderate density, and high compressional sonic across the project area. The shale within the Deadwood B member is 9,791 ft below the surface and 34 ft thick at the Tundra SGS site (Figures 2-40 and 2-41, Table 2-10).

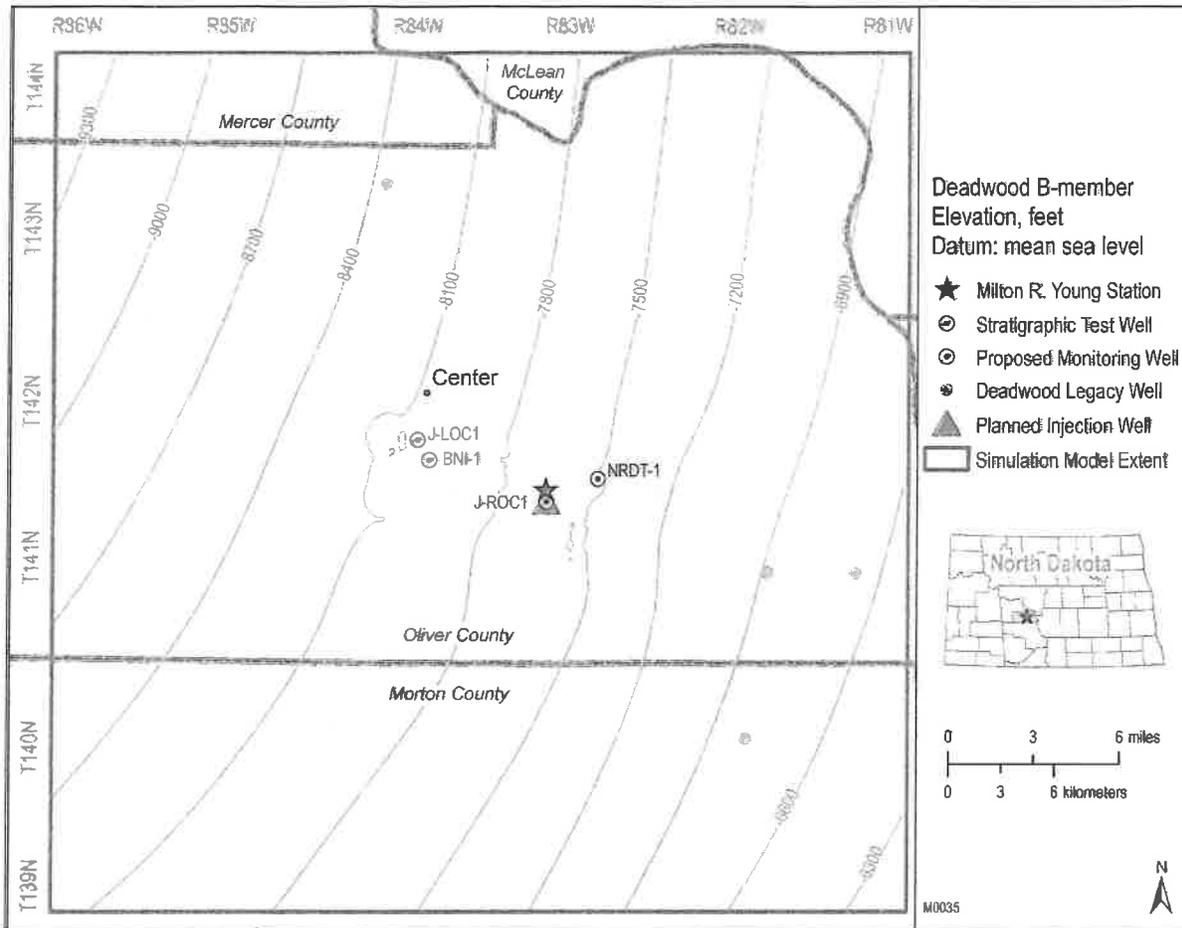


Figure 2-40. Structure map of the Deadwood B member shale across the greater Tundra SGS area.

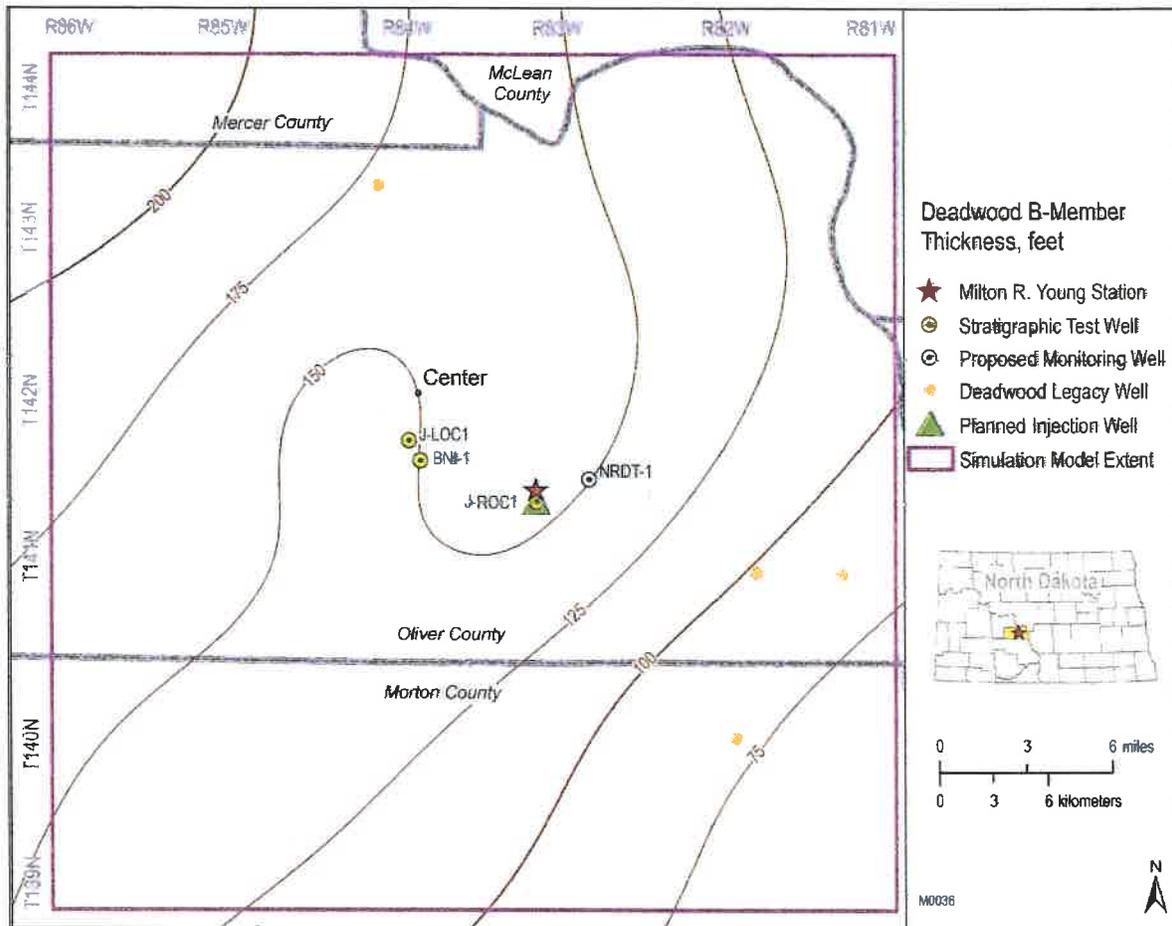


Figure 2-41. Isopach map of the Deadwood B member shale across the Tundra SGS area.

At 144 ft below the top of the Deadwood C-sand is an 80-ft-thick shaly layer of the Deadwood B member. Data acquired from the core plug samples taken from the Deadwood B member show porosity values ranging from 1.55% to 2.63% and permeability values from 0.0083 to 0.0177 mD (Table 2-17).

Table 2-17. Deadwood B Member Shale Core Sample Porosity and Permeability from J-LOC1

Sample Depth, ft	Porosity, %	Permeability, mD
10,152	1.84	0.0083
10,159.5	1.55	0.0177
10,181.5	2.63	0.0076
Range	1.55–2.63	0.0083–0.0177

2.4.3.1 Mineralogy

Thin-section analysis and well logs show that the Deadwood B interval comprises carbonates and shale facies. The carbonates are composed mainly of calcite minerals and fossils and then by feldspar and quartz. The Deadwood B shows a tight formation characteristic where the permeability ranges from 0.0094 and 3.18 mD and porosity ranges from 1% to 8%.

XRD was performed, and the results confirm the observations made during core analyses and thin-section description.

XRF data show the Deadwood B shale is mainly composed of CaO (35%), SiO₂ (30%), and Al₂O₃ (4%) (Table 2-18).

Table 2-18. XRF Data for the Deadwood B Shale from the J-LOC1 Well

Sample Depth			
10,159.5 ft		10,181.5 ft	
Component	Percentage	Component	Percentage
SiO ₂	45.18	SiO ₂	15.66
Al ₂ O ₃	5.08	Al ₂ O ₃	2.20
MgO	0.39	MgO	0.79
CaO	25.61	CaO	45.24
SO ₃	0.75	SO ₃	0.18
Other	5.40	Other	3.58

2.4.3.2 Geochemical Interaction, Deadwood B Shale

The Deadwood C-sand's underlying confining layer, the Deadwood B, was investigated using PHREEQC geochemical software. A vertically oriented 1D simulation was created using a stack of five cells, each cell 1 meter in thickness. The formation was exposed to CO₂ at the top boundary of the simulation and allowed to enter the system by advection and dispersion processes. The results were calculated at the center of each cell below the confining layer—CO₂ exposure boundary. The mineralogical composition of the Deadwood B was honored (Table 2-19). Formation brine composition was assumed the same as the known composition from the Deadwood sand injection zone above (previously shown in Table 2-14). The injection stream composition was as described by Minnkota (Table 2-15). The Deadwood B Formation temperature and pressure were adjusted from the Deadwood sand reservoir temperature and pressure conditions, 188°F and 4,357 psi, respectively. Two different pressure levels, 4,357 and 4,652 psi, were applied to the CO₂-saturated brine at the base of the Deadwood sand. These values represent the initial and potential pore pressure levels. The higher-pressure results are shown here to represent a potentially more rapid pace of geochemical change. These simulations were run for 45 years to represent 20 years of injection plus 25 years postinjection.

Table 2-19. Mineral Composition of the Deadwood B Shale, derived from XRD analysis of JLOC-1 core samples Deadwood B Shale (10, 144 ft)

Minerals, wt%	
Illite/Muscovite	10.7
Glauconite	5.2
Clintonite	4.8
K-Feldspar	48.5
Quartz	20.2
Calcite	2.4
Chlorite	1.5
Kaolinite	1.3
Other	5.4

The results showed geochemical processes at work. Figures 2-42, 2-43, 2-44, and 2-45 show findings from the high-pressure, more extreme exposure case. Figure 2-42 shows change in fluid pH over 45 years of simulation time as CO₂ enters the system. Initial change in pH in all the cells from 6 to 5.8 is related to initial equilibration of the model. For the cell at the CO₂ interface, C1, the pH declines from its initial level of 6.0 to 5.3 after 4 years of injection and slowly declines further to 4.4 after the 25-year postinjection period. Similar, but progressively slower, pH change occurs for each cell that is more distant from the CO₂ interface. The pH for Cells 10–19 did not decline over the 45 years of simulation time. Figure 2-43 shows that CO₂ does not penetrate more than 9 meters (represented by Cell C9) within the 45 years simulated.

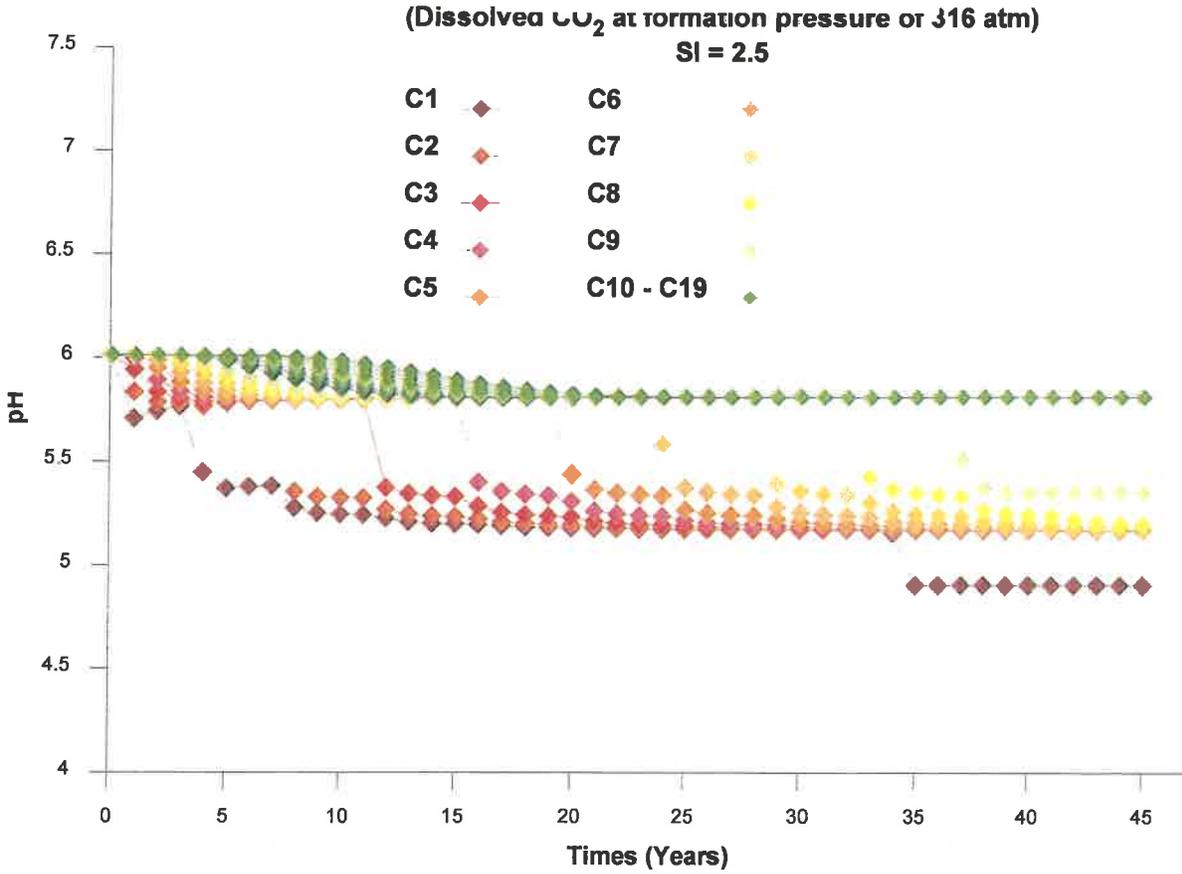


Figure 2-42. Change in fluid pH in the Deadwood B shale underlying confining layer. The red line shows the pH calculated at the center of Cell C1 at 0.5 meters below the Deadwood B top. The green line shows Cell C5 at 4.5 meters below the Deadwood B top.

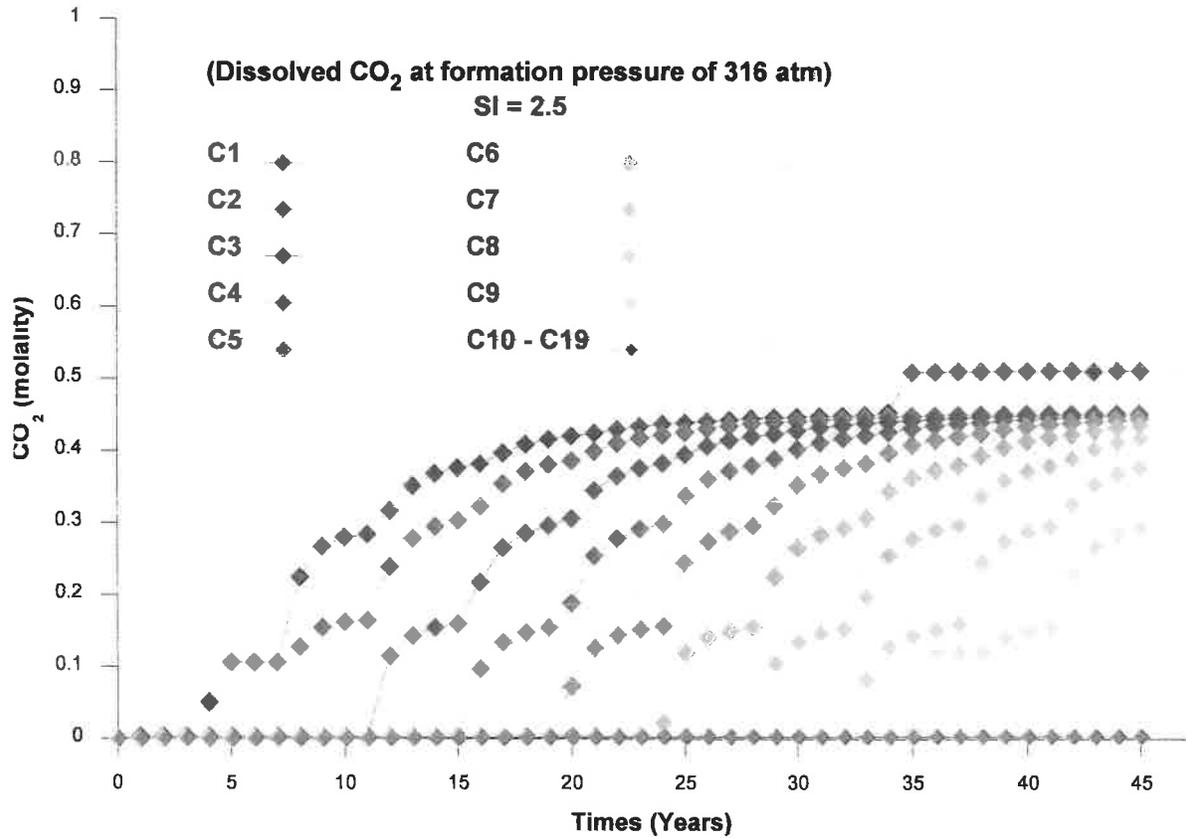


Figure 43. CO₂ concentration (molality) in the Deadwood B shale underlying confining layer for Cells C1–C19.

Figure 2-44 shows the changes in mineral dissolution and precipitation in grams per cubic meter. For Cell C1, K-feldspar is the primary dissolution mineral, with minor chlorite. Illite and quartz precipitation largely replace that dissolution. The reaction rate in the C1 cell dramatically slows after approximately 9 years, and cell geochemistry stabilizes. As Cell C1 stabilizes, dissolution and precipitation begin in Cell C2, with minor amounts of chlorite dissolving and modest precipitation of dolomite.

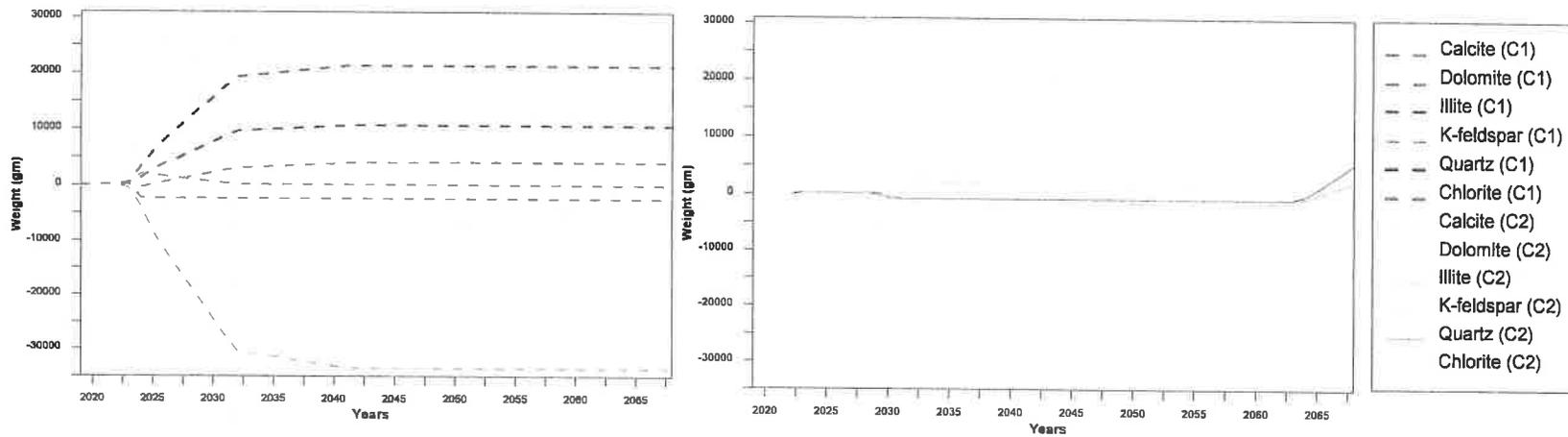


Figure 2-44. Dissolution and precipitation of minerals in the Deadwood B underlying confining layer. Dashed lines show results for Cell C1 at 0 to 1 meter below the Deadwood B top. Solid lines show results for Cell C2 at 1 to 2 meters below the Deadwood B.

Change in porosity (% units) of the Deadwood B underlying confining layer is displayed in Figure 2-45. The overall net porosity changes from dissolution and precipitation are minimal, less than a 0.2% change during the life of the simulation. Cell C1 shows an initial porosity increase of 0.1%, but this change is temporary, and the cell returns to its near-initial porosity value of 2.0%. Cells C2 and C3 undergo similar changes but with progressively longer time delay. At the end of the simulation, no significant net porosity changes were observed for these cells. These results suggest that the Deadwood B will not undergo significant geochemical change in the presence of CO₂ injection.

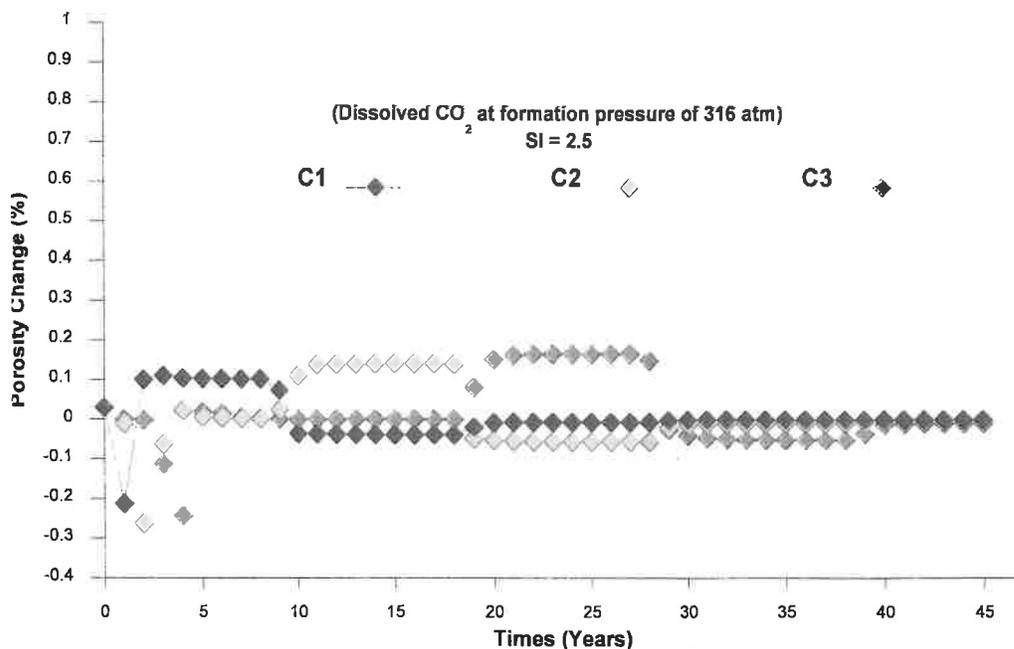


Figure 2-45. Change in percent porosity in the Deadwood B underlying confining layer. The red line shows porosity change for Cell C1 at 0 to 1 meter below the Deadwood B top. The yellow line shows Cell C2 at 1 to 2 meters below the Deadwood B top. The green line shows Cell C3 at 2 to 3 meters below the Deadwood B top. Long-term change in porosity is minimal and stabilized. Cells C4–C19 showed similar results, with net porosity change being less than 0.3%.

2.4.4 Geomechanical Information of Confining Zone

2.4.4.1 Fracture Analysis

Fractures within the Icebox Formation, the overlying confining zone, and Deadwood B Formation, the underlying confining zone, have been assessed during the description of the J-LOC1 well core. Observable fractures were categorized by attributes, including morphology, orientation, aperture, and origin. Secondly, natural, in situ fractures were assessed through the interpretation of Schlumberger's Quanta Geo log acquired during the drilling of the J-LOC1 well.

2.4.4.2 *Fracture Analysis Core Description*

Features within the Icebox Formation are primarily related to the compaction. There is no presence of natural fractures. Only the stylolites which are compaction-related exist; they vary in orientation and exhibit mainly horizontal and rare oblique trends.

In the Deadwood B Formation, rare closed-tension fractures were observed in the core interval and are commonly coincident with the observed horizontal compaction features (stylolite). Quartz is the dominant mineral found to fill observable fractures. The stylolites are well-represented, vary in orientation, and exhibit mainly a horizontal trend.

2.4.4.3 *Borehole Image Fracture Analysis*

Schlumberger's Quanta Geo log was chosen to evaluate the geomechanical condition of the formation in the subsurface. This log provides a 360-degree image of the formation of interest and can be oriented to provide an understanding of the general direction of features observed.

Figures 2-46 and 2-47 show two sections of the interpreted borehole imagery and primary features observed. The far-right track on Figure 2-46 demonstrates that the tool provides information on surface boundaries and bedding features and notes the presence of electrically conductive features that characterize the Icebox Formation. These are interpreted as stylolites. Figure 2-47 reveals the features that are clay-filled because of their electrically conductive signal. The logged interval of the Deadwood B shows that the main features present are stylolites, which are an indication that the formation has undergone a reduction in porosity in response to postdepositional stress.

The diagrams shown in Figures 2-48 and 2-49 provide the orientation of the electrically conductive features in the Icebox and Deadwood B Formations, respectively. As shown, the electrically conductive features are stylolites and have no preferred orientation.

Drilling-induced fractures were not identified either in the Icebox or Deadwood B Formations. However, breakouts were highlighted in the Precambrian basement and are oriented northwest-southeast (Figure 2-50), which is perpendicular to the maximum horizontal stress (SH_{max}).

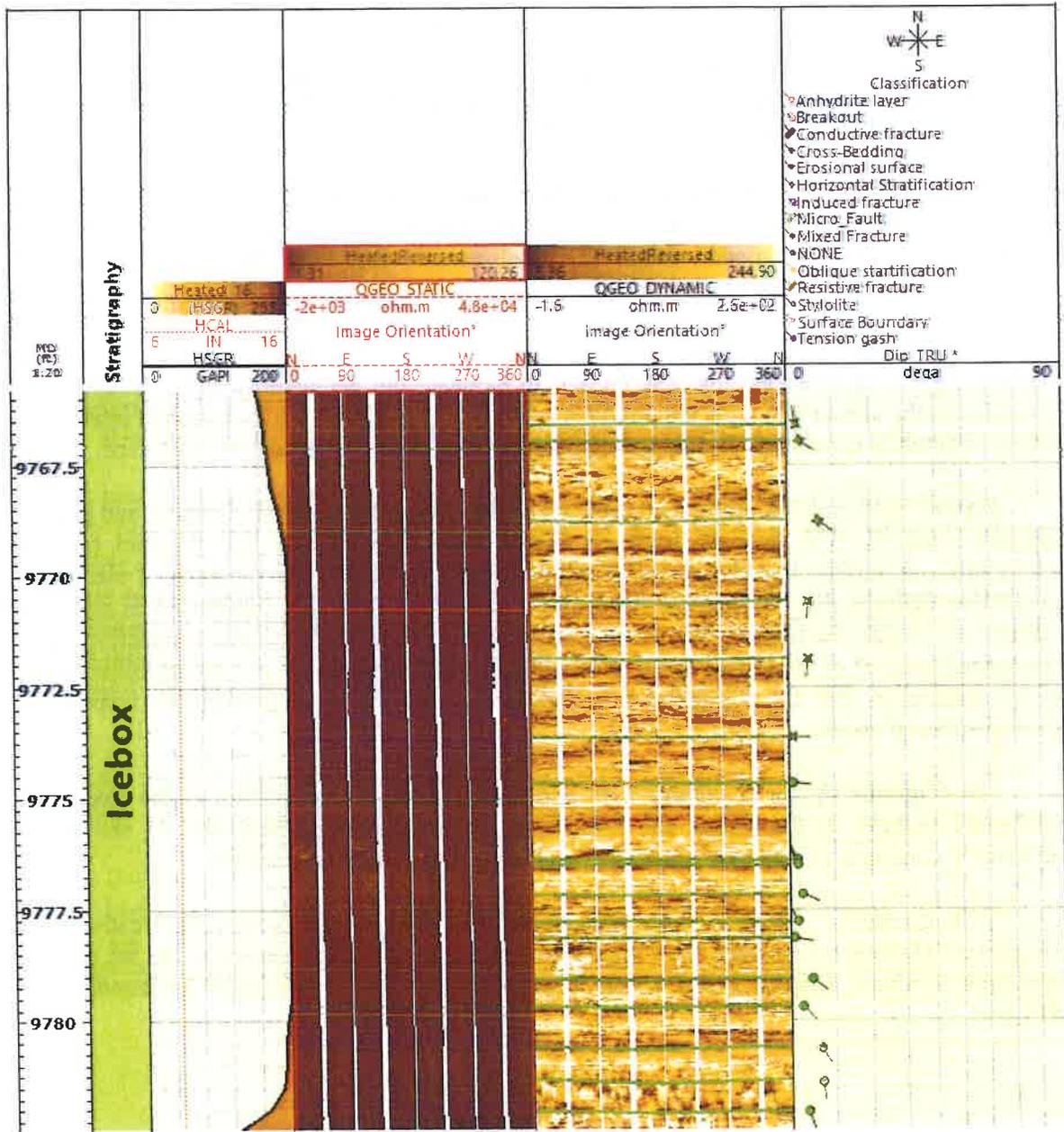


Figure 2-46. Examples of the interpreted Quanta Geo log for the J-LOC1 well. This example shows the common feature types seen in the Icebox Quanta Geo borehole image analysis.

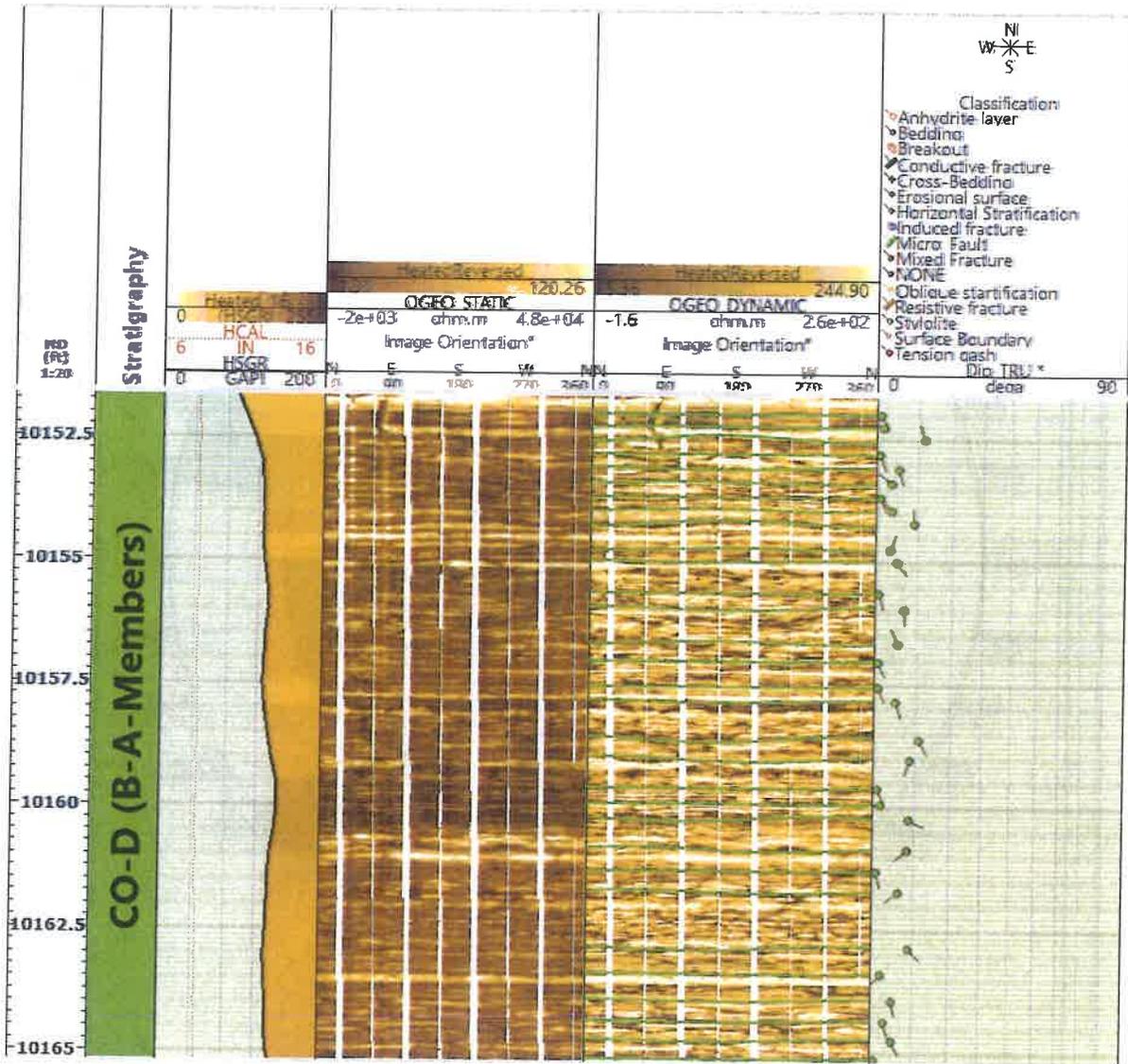


Figure 2-47. Examples of the interpreted Quanta Geo log for the J-LOC1 well. This example shows the common feature types seen in the Deadwood B Quanta Geo borehole image analysis.

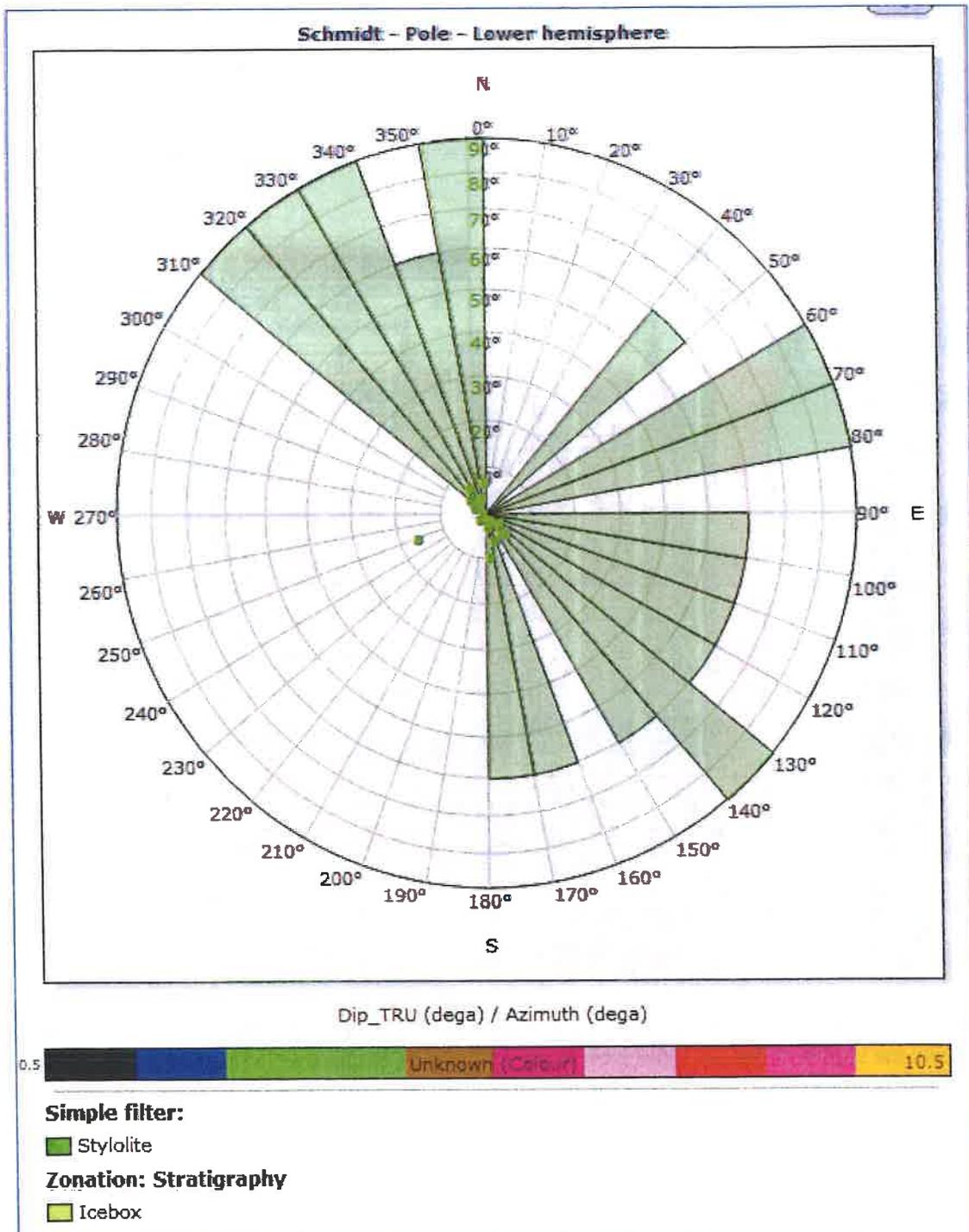


Figure 2-48. This example shows stylolites seen in the Icebox Formation.

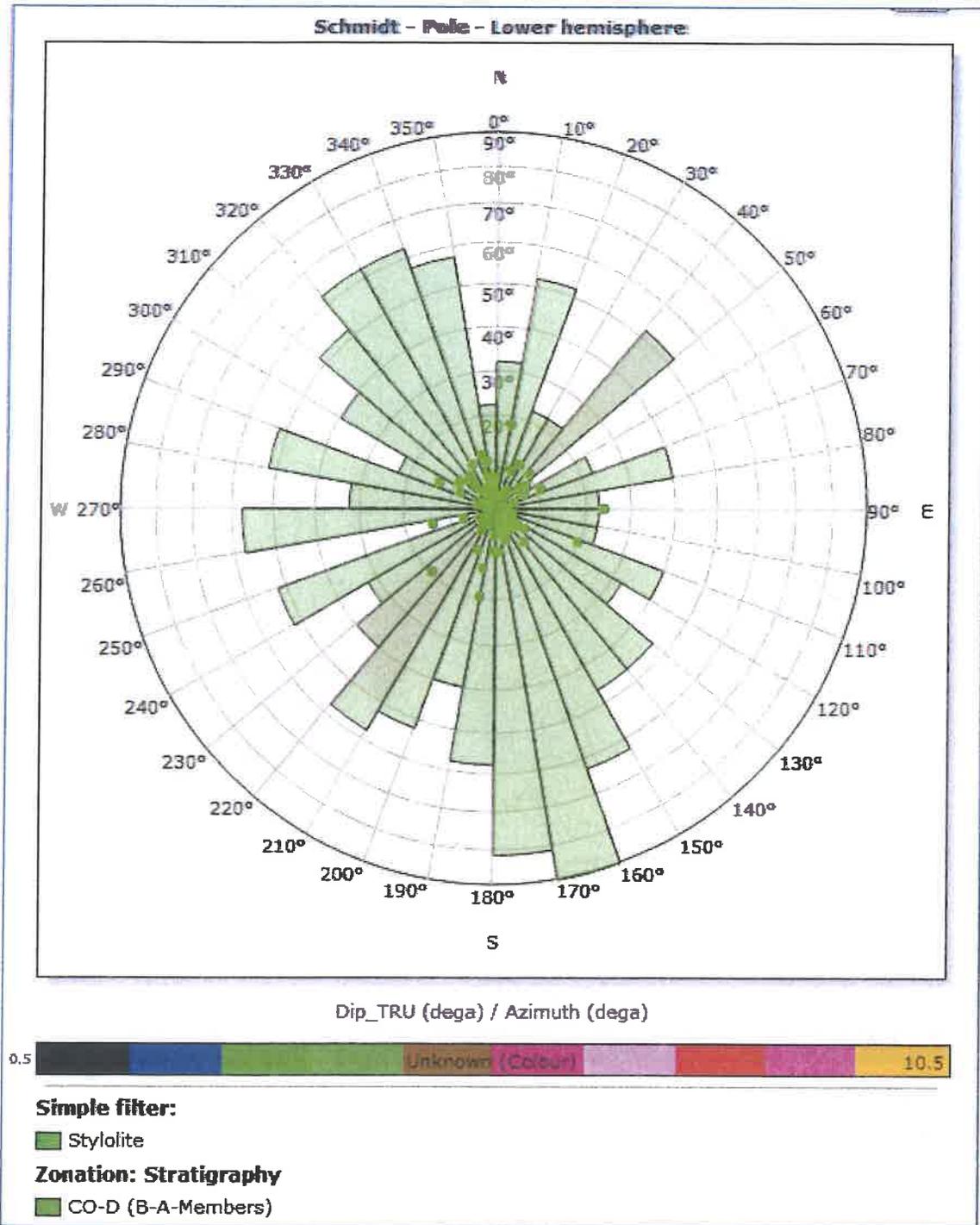


Figure 2-49. This example shows stylolites seen in the Deadwood B Formation.

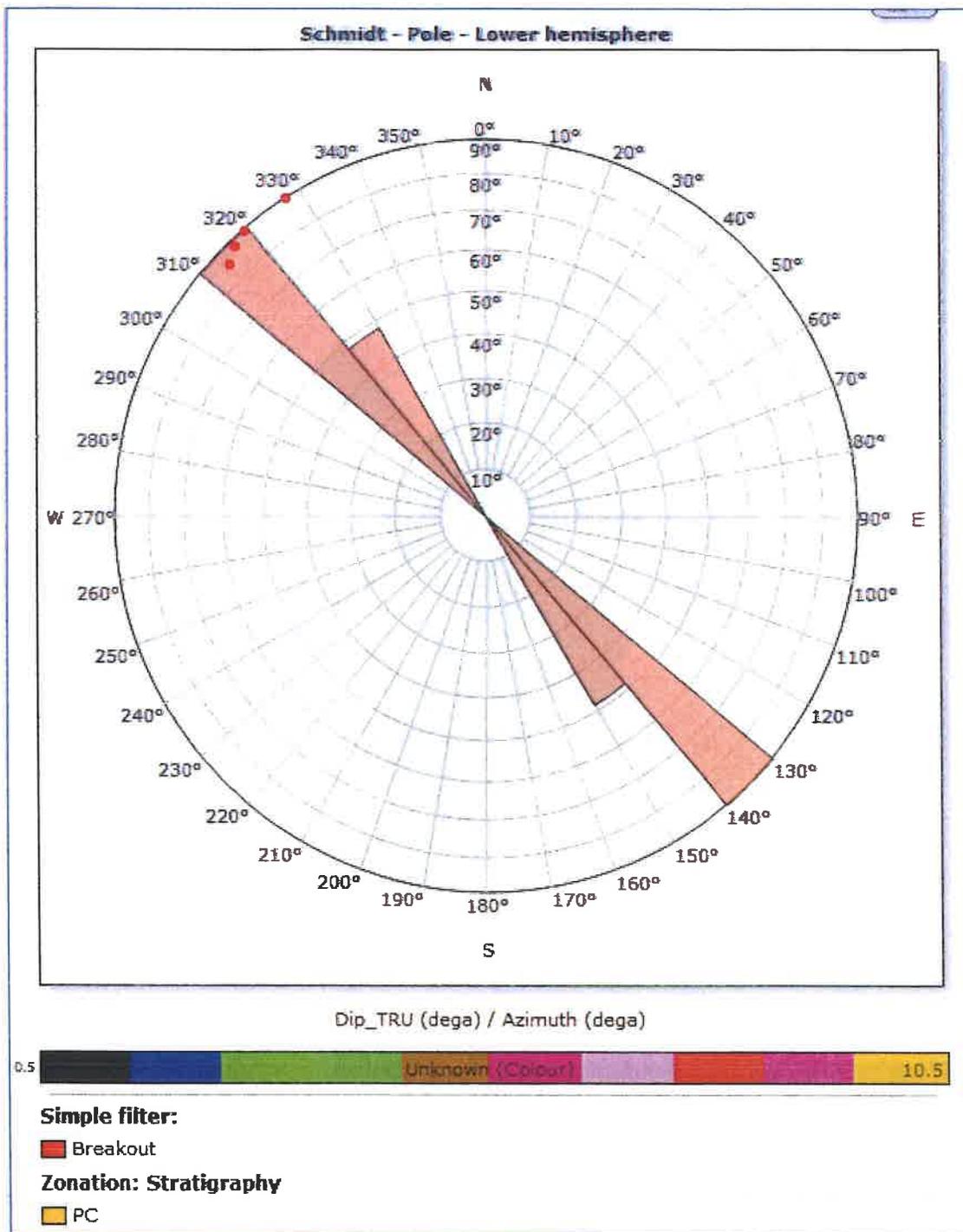


Figure 2-50. Breakout dip orientation in the Precambrian basement.

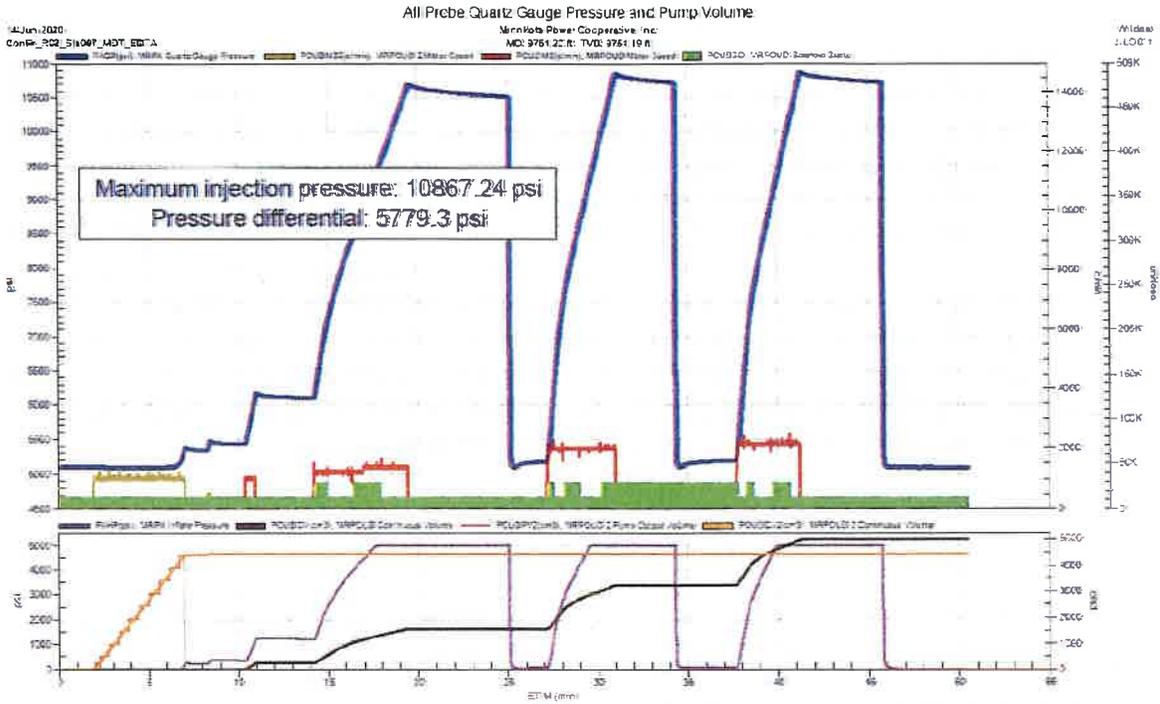


Figure 2-52. J-LOC1 Icebox MDT microfracture in situ stress test (second attempt) at 9,751.19 ft.

J-LOC1 openhole logging data were used to construct a 1D mechanical earth model (MEM) for different formations, including the Icebox Formation. The data available were loaded and quality-checked using Techlog software, where the overburden stress and pore pressure were estimated and calibrated with available MDT data. The elastic properties such as Young's modulus, Poisson's ratio, Shear modulus, and Bulk modulus were calculated based on the available well logs. The formation strength properties like uniaxial compressive strength (UCS), tensile strength, friction angle, and cohesion were also estimated from the available data (Figure 2-53). Table 2-21 provides the summary of stresses in the Icebox Formation generated using the 1D MEM.

Table 2-21. Summary of Stresses in Icebox Formation

Depth, ft	Hydrostatic pressure, psi	Vertical Stress, psi	Minimum Stress, psi
9,665	4,349	10,543	6,853
9,780	4,401	10,675	6,557

2.4.4.5 Ductility and Rock Strength

Ductility and rock strength have been determined through laboratory testing of rock samples acquired from the Icebox and Deadwood B Formation cores in the J-LOC1. Icebox Formation samples were not testable. Plugs failed under minor stress because of the fissility of the rock. On the other hand, one sample from the Deadwood B Formation was tested and characterized by a porosity equal to 1.4% and a permeability of 0.001 mD. To determine these parameters, a multistage triaxial test was performed at confining pressures exceeding 40 MPa (5801.51 psi). This commonly used test provides information regarding the elastic parameters and peak strength of a material (Figure 2-54). Table 2-22 shows the sample parameters, while Tables 2-23 and 2-24 show the elastic, dynamic, and velocity parameters obtained at different confining pressures.

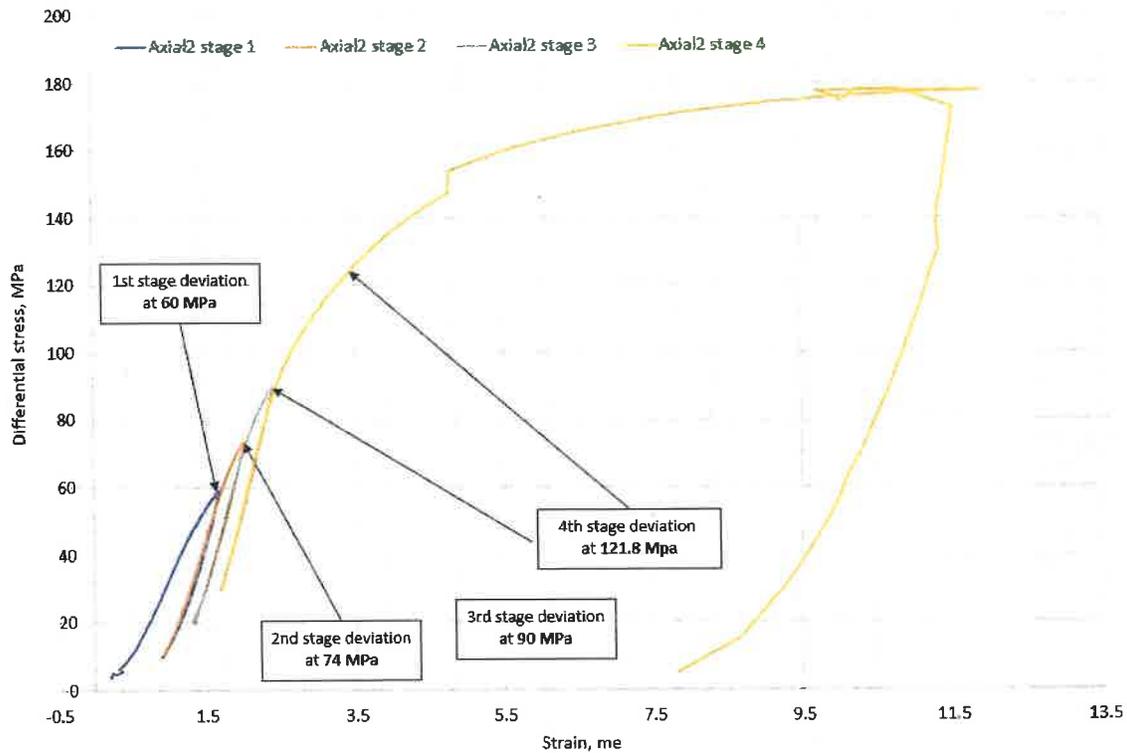


Figure 2-54. Results of multistage triaxial test performed at confining pressures exceeding 40 MPa (5,800 psi), providing information regarding the elastic parameters and peak strength of the rock sample. Failure occurred at the fourth-stage peak stress of 121.8 MPa.

Table 2-22. Sample Parameters

Sample and Experiment Information	
Depth: 10,197.5 ft	Rock Type: Limestone
Formation: Deadwood B	Porosity: 1.4%
Dry Bulk Density: 2.765 g/cm ³	Pore Fluids: –
Diameter: 25.40 mm	Entered Length: 58.17 mm

Table 2-23. Elastic Properties Obtained Through Experimentation: E = Young's Modulus, n = Poisson's Ratio, K = Bulk Modulus, G = Shear Modulus, P = Uniaxial Strain Modulus

Elastic Properties Measured at Different Confining Pressures							
Event	Conf., MPa	Diff., MPa	E, GPa	n	K, GPa	G, GPa	P, GPa
1	10.0	9.9	66.75	0.189	35.81	28.06	73.22
2	20.3	20.0	68.77	0.246	51.74	31.60	93.88
3	30.2	29.8	71.50	0.275	64.93	34.30	110.67
4	40.3	29.8	77.00	0.227	46.97	31.38	88.81

Table 2-24. Velocity and Dynamic Properties Obtained Through Experimentation: Vp = P-Wave Velocity, Vs = Shear Wave Velocity, E = Young's Modulus, n = Poisson's Ratio

Ultrasonic Velocity Measurements at Different Confining Pressures							
Event	Conf., MPa	Diff., MPa	Vp, m/s	Vs ^(X-direction) m/s	Vs ^(Y-direction) m/s	E, GPa	n, -
0	2.7	–	5172	2712	2944	56.91	0.287
1	10.2	–	5576	2837	3031	62.29	0.309
2	20.2	–	5836	3076	3131	69.39	0.303
3	30.1	–	5943	3098	3174	71.08	0.307
4	40.2	–	5986	3106	3220	72.27	0.306

2.5 Faults, Fractures, and Seismic Activity

In the Tundra SGS area, no known or suspected regional faults or fractures with sufficient permeability and vertical extent to allow fluid movement between formations have been identified through site-specific characterization activities, previous studies, or oil and gas exploration activities. Features interpreted from the 3D seismic data, including paleochannels, a flexure, and a suspected fault in the Precambrian basement, are discussed in this section as well as the data that support the low probability that these features will interfere with containment. The following section also discusses the seismic history of North Dakota and the low probability that seismic activity will interfere with containment.

2.5.1 Interpreted Features

The analysis of 3D seismic data acquired specifically for Tundra SGS in 2019 and 2020 (Figure 2-6) revealed evidence for suspected paleochannels or preferential erosional zones at the top of the Precambrian basement. Maps of the seismic reflection event interpreted to be the Precambrian–Deadwood contact suggest these features are fairly linear in nature (Figure 2-55). In cross-sectional view of the seismic data, these features appear as depressions in the top of the Precambrian and the lower portion of the Deadwood (Figure 2-56 and 2-57). The isopach values depicted in Figure 2-58 suggest erosional relief on the Precambrian surface of nearly 460 ft. The absence of thickness changes in the Winnipeg or other formations overlying the Deadwood associated with these features suggest these features were filled in during the deposition of the Deadwood.

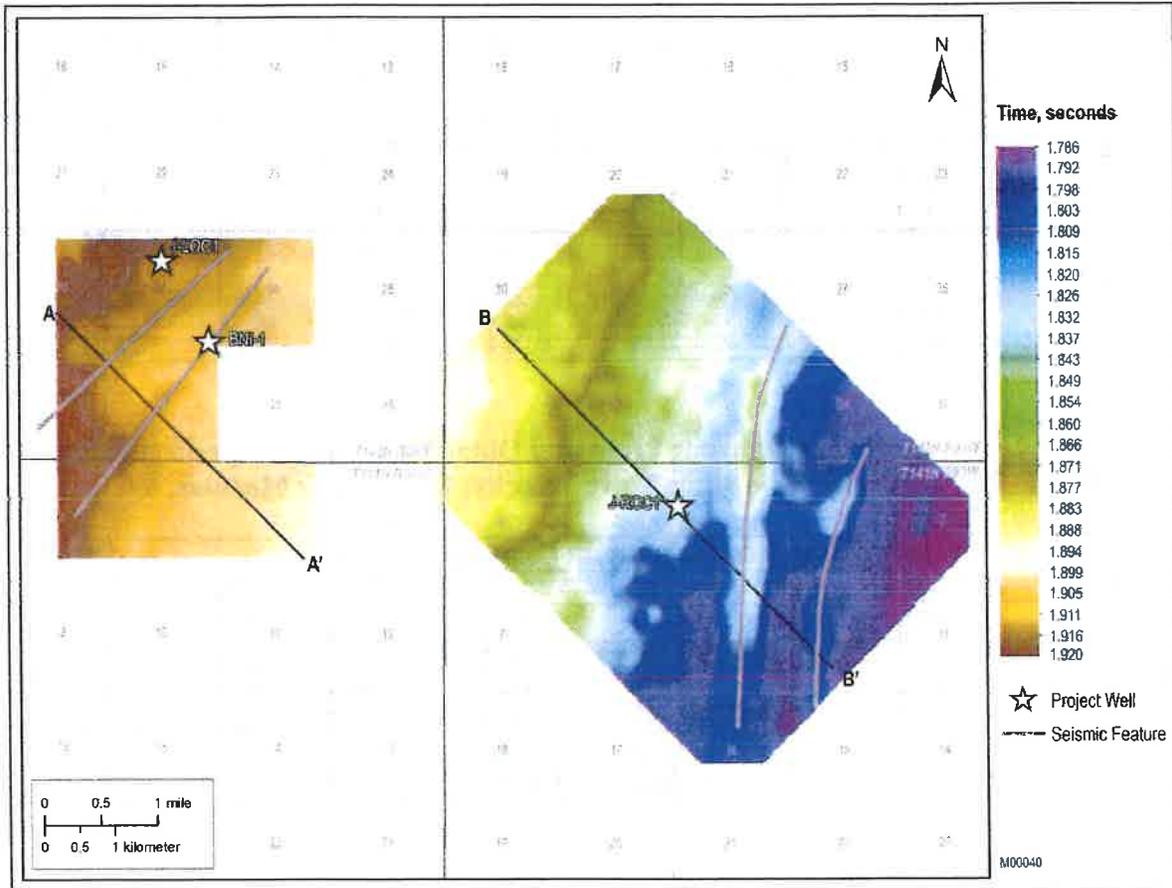


Figure 2-55. Map showing the time structure of the seismic reflection event interpreted to be the Precambrian–Deadwood contact.

In the western 3D seismic survey data, there is no indication that the identified features impact the intervals above the lower Deadwood. Additionally, there is no indication of offset reflections above or below these features in the western 3D seismic survey data that would suggest any deformation or movement associated with these features. There is no evidence to suggest that these interpreted paleochannel features have sufficient permeability or vertical extent to interfere with containment.

There is a flexure in the eastern 3D seismic data where the seismic reflections above the interpreted Precambrian–Deadwood boundary through the Red River Formation appear to dip or sag down (Figure 2-59). These depressions are interpreted to be draped over one of the interpreted paleochannels located at the Precambrian–Deadwood boundary (Figure 2-57). A deep structure was interpreted in the Precambrian basement below this paleochannel and flexure. This structure appears to be a low-dipping thrust fault that terminates at the top of the Precambrian basement (Figure 2-60). The location of this Precambrian fault provides evidence that there was likely

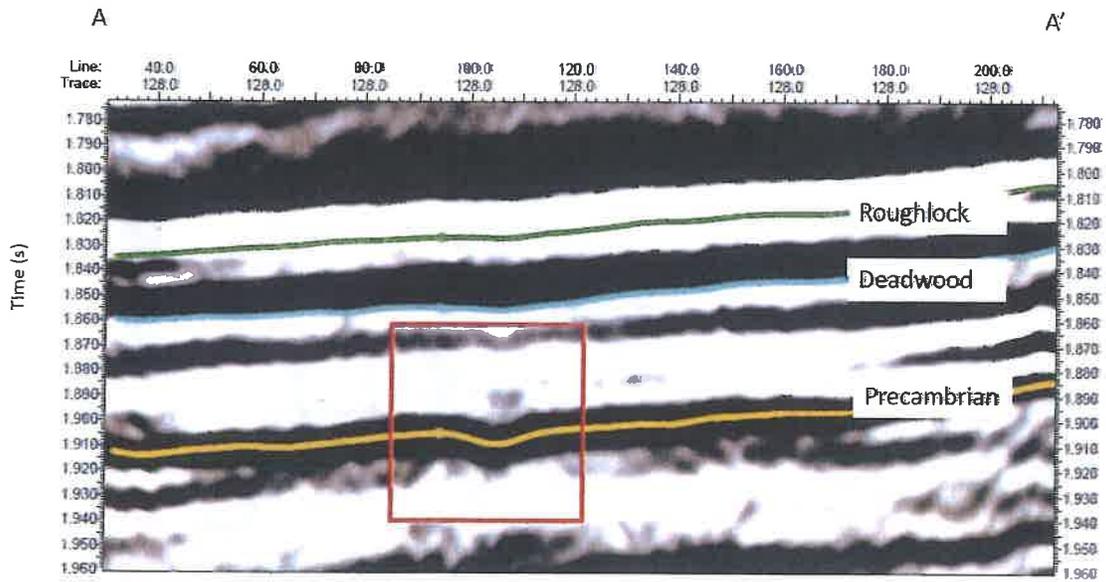


Figure 2-56. Cross-sectional view of the 3D seismic data through one of the linear trends in the West 3D seismic survey. Identified formations include Roughlock (green), Deadwood (blue), and Precambrian (yellow). The red box indicates the area that corresponds to the linear feature. Figure 2-55 shows the location of this cross section.

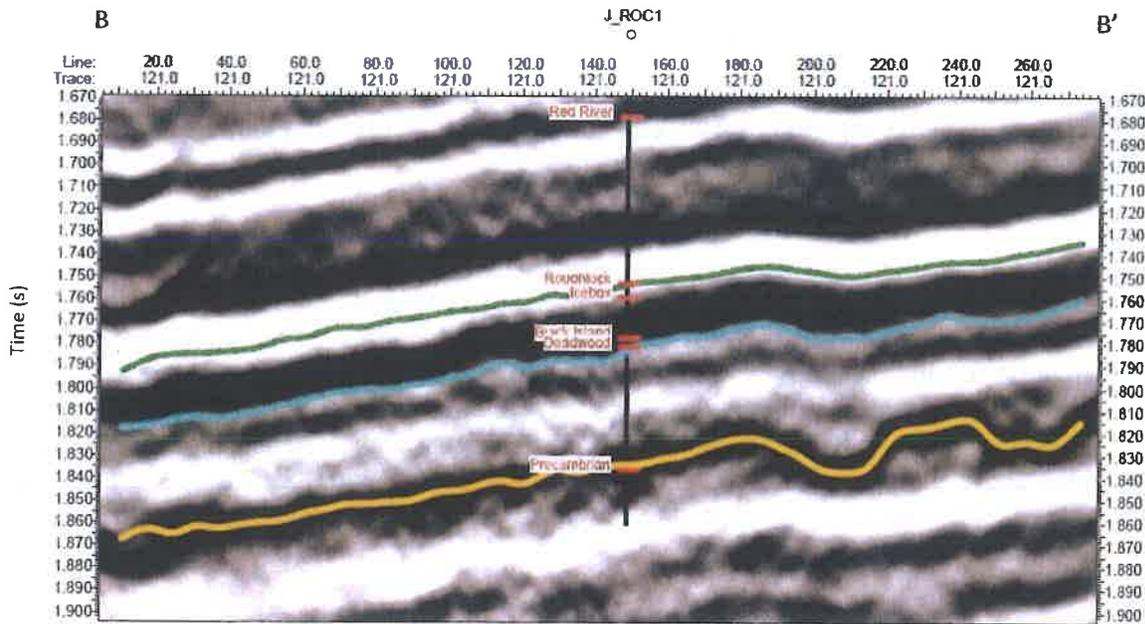


Figure 2-57. Cross-sectional view of the 3D seismic data through one of the linear trends in the east 3D seismic survey. Identified formations include Roughlock (green), Deadwood (blue), and Precambrian (yellow). Depressions along the top of the Precambrian suggest the presence of paleochannels. Figure 2-55 shows the location of this cross section.

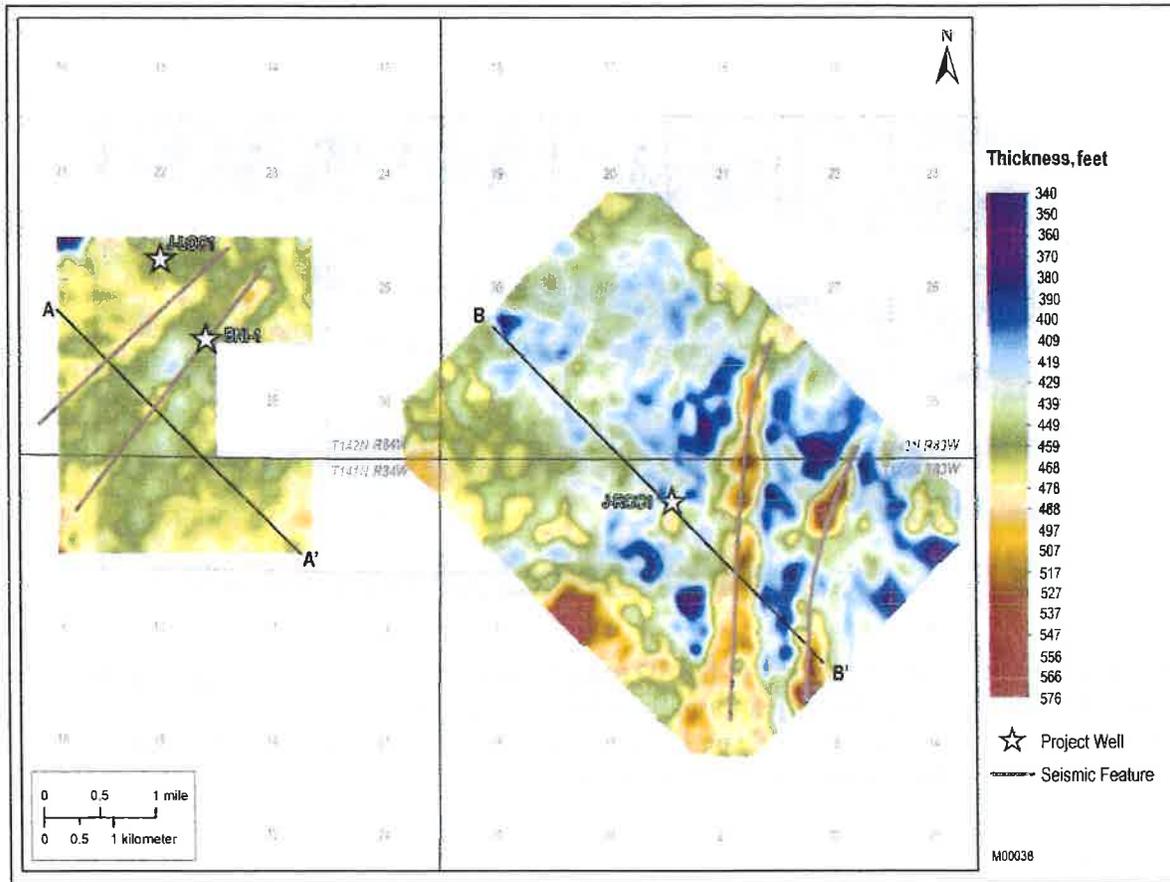


Figure 2-58. Map showing the thickness of the interval from the Precambrian erosional surface up through the top of the Deadwood Formation calculated using the seismic data. The linear trends correspond to areas of increased thickness.

preferential erosion along the exposed Precambrian fault trace during the deposition of the Deadwood Formation. The dip of the Precambrian fault is low-angle whereas the flexure above the paleochannel feature is near-vertical, supporting the interpretation of the fault terminating at the top of the Precambrian basement. The seismic interpretation indicates that the interpreted fault in the Precambrian basement is dipping at ~ 25 degrees relative to horizontal being 0 degrees. The flexure observed in the overlying sediments is likely associated with postdepositional differential compaction above the paleochannel or slump due to movement along this low-angle basement fault. There is no evidence to suggest that this flexural feature has sufficient permeability to interfere with containment.

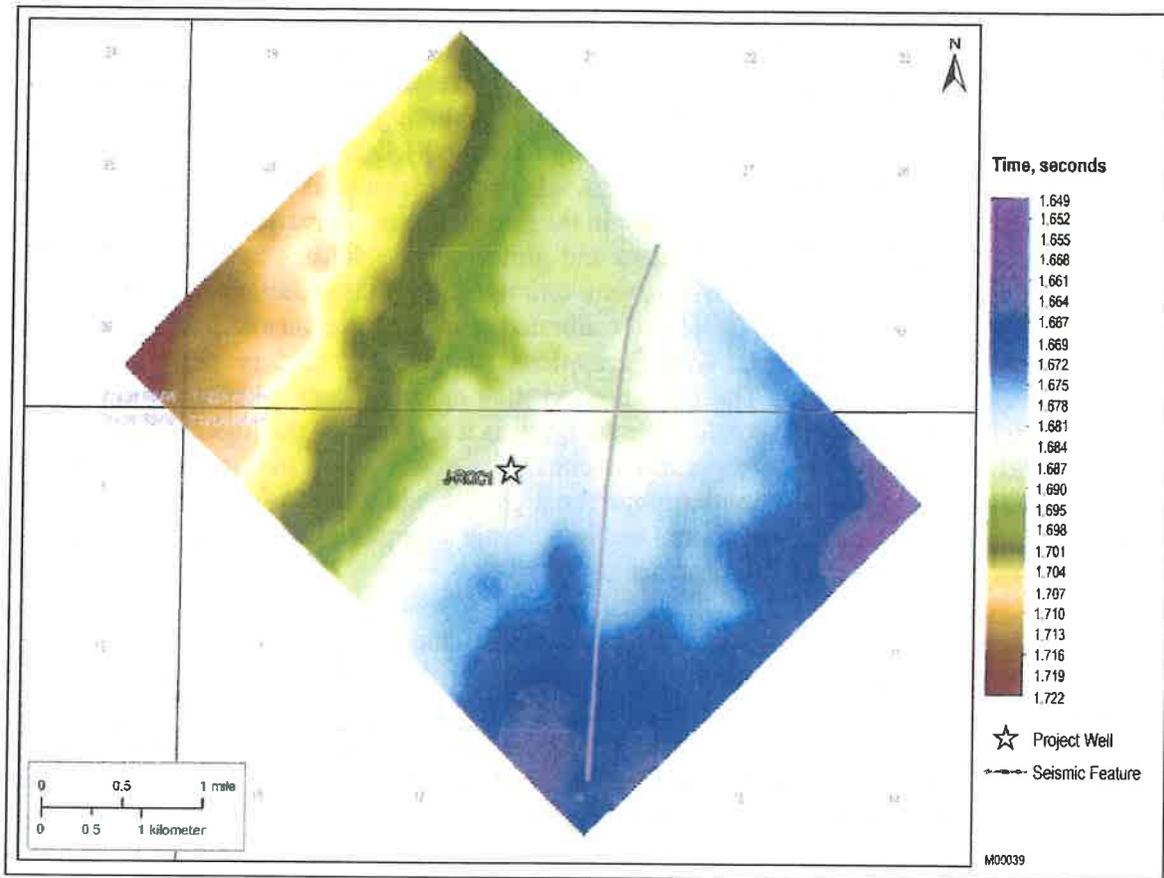


Figure 2-59. Map showing the time structure of the seismic reflection event interpreted to be the top of the Red River Formation. The line shows the location of the interpreted paleochannel that underlies the flexure.

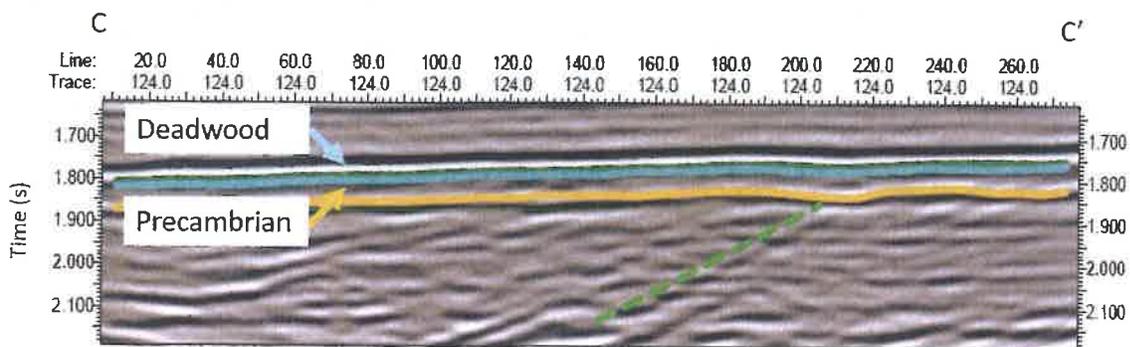


Figure 2-60. Cross-sectional view of the 3D seismic data through one of the linear trends in the east 3D seismic survey. Identified formations include Deadwood (blue) and Precambrian (yellow). The location of the interpreted low-angle thrust fault is shown by the green dashed line. Cross Section C-C' runs parallel to Cross Section B-B' shown in Figure 2-55 and is located 160 ft to the west of Cross Section B-B'.

2.5.5.1 Precambrian Fault Geomechanics Study

Geomechanical modeling was done to determine the potential risk of induced seismicity associated with the interpreted Precambrian fault and planned injection activities. The 3D seismic data were used to estimate the dip and strike of the interpreted fault, including uncertainty ranges on both for input into this modeling. A 1D stress model was built from the J-LOC1 well data using the density, compressional sonic, and shear sonic well logs. The pore pressure is assumed equivalent to hydrostatic pressure, with a slight overpressure in the Broom Creek Formation. Overburden stress was estimated by integrating the density data and projecting the density trend to surface. The principal horizontal stresses $S_{h_{min}}$ and $S_{H_{max}}$ were estimated using the modified Eaton poroelastic model from Theircelin and Plumb (1994) and calibrated to closure pressure measurements in the Deadwood, Broom Creek, and Inyan Kara Formations. Static elastic rock property inputs were calibrated to core measurements. The most conservative approach was taken by choosing the largest differential stress model to conduct the analysis, as it represented the highest risk scenario. A stress trend was developed to represent a consistent stress trend through the Deadwood Formation that was an equivalent trend through the highest-magnitude stresses. For the purposes of failure analysis on the existing feature in the seismic interpretation, that stress trend was projected down into the Precambrian basement.

To understand the highest possible risk scenario, the scenario where the interpreted Precambrian fault extends into the Deadwood Formation was considered even though the seismic data do not suggest that it does. Conservative estimates for friction coefficient (30) and cohesion (0) were used in this analysis. Given those conditions and the state of stress modeled in the Deadwood, the failure analysis indicated that a pressure increase of 3,600–4,800 psi would be required to induce shear failure on that feature (Figure 2-61).

The maximum expected pressure change in the Deadwood due to planned injection activities does not exceed 1,800 psi, which is well below the 3,600–4,800-psi pressure threshold for failure (Figure 2-62). Additionally, the injection interval is approximately 120 ft above the Precambrian–Deadwood boundary and the expected pressure change due to planned injection activities at the Precambrian–Deadwood boundary does not exceed 60 psi. Analysis of the geomechanics study results as applied to the characteristics of the interpreted Precambrian fault and site-specific geomechanical data suggests planned injection activities will not cause induced seismicity.

Additionally, sensitivity analysis was run using the publicly available Fault Slip Potential tool using the inputs of friction coefficient, $S_{H_{max}}$ azimuth, fault dip, fault strike, pore pressure, $S_{H_{max}}$ magnitude, $S_{H_{min}}$ magnitude, and overburden magnitude. The results proved insensitive to all inputs except the dip of the fault. At the low-angle dip of the fault, there is very low risk of failure given the interpretation of the state of stress.

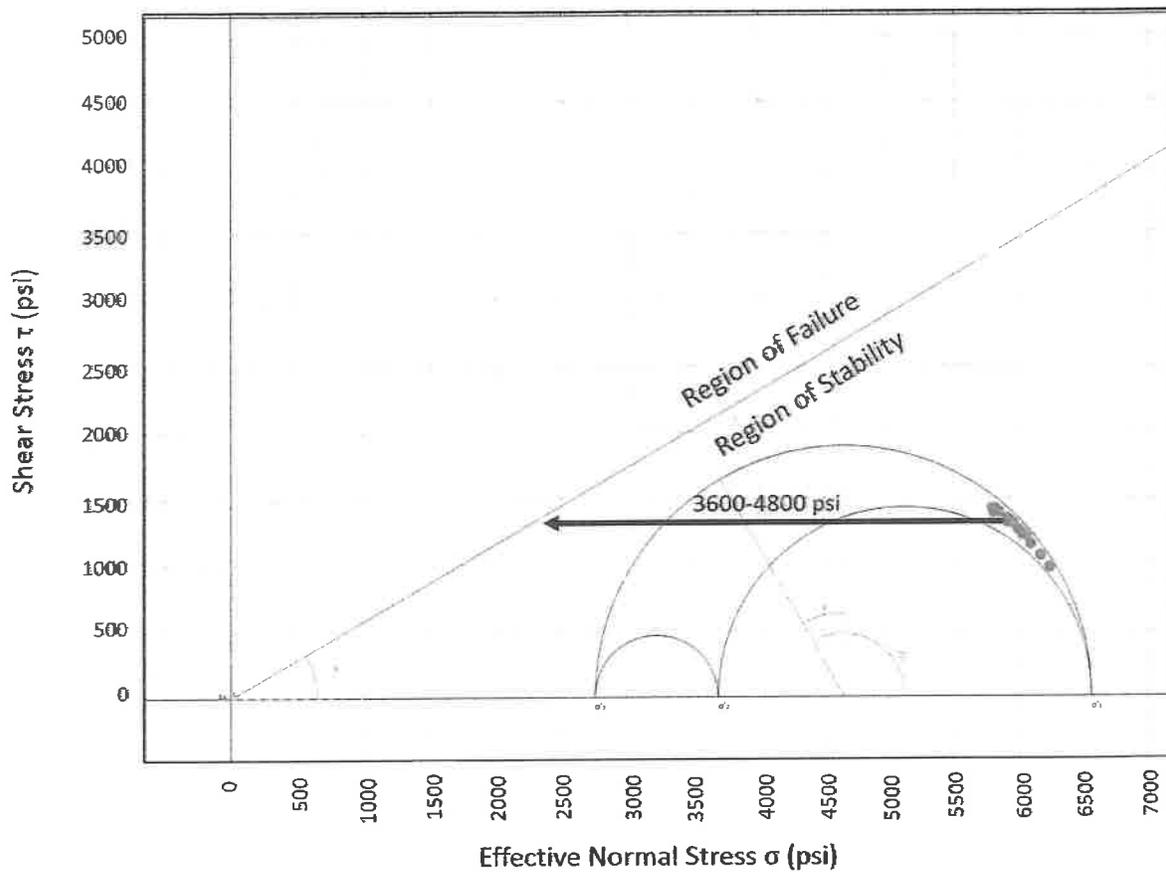


Figure 2-61. Mohr circle depiction of the stress state at the depth of the Deadwood Formation indicates a pressure window of 3,600 to 4,800 psi to create failure on the fault represented by the pink dots. Pink dots represent the strike and dip values for the fault interpreted from the seismic data relative to in situ stress orientations.

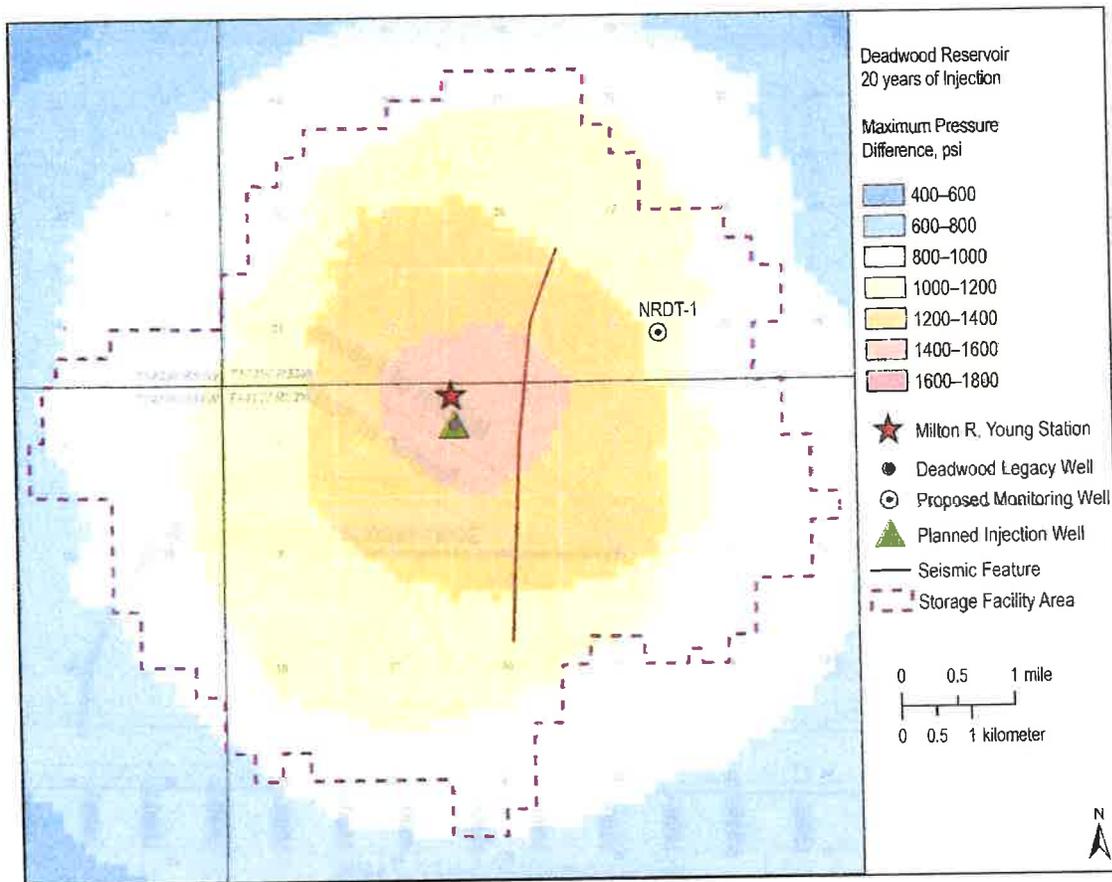


Figure 2-62. Map showing the maximum pressure change expected within the injection zone from the proposed injection activities. The location of the interpreted paleochannel and flexure is indicated by the red line.

2.5.2 Seismic Activity

The Williston Basin is a tectonically stable region of the North American Craton. Zhou and others (2008) summarize that “the Williston Basin as a whole is in an overburden compressive stress regime,” which could be attributed to the general stability of the North American Craton. Interpreted structural features associated with tectonic activity in the Williston Basin in North Dakota include anticlinal and synclinal structures in the western half of the state, lineaments associated with Precambrian basement block boundaries, and faults (North Dakota Industrial Commission, 2019).

Between 1870 and 2015, 13 seismic events were detected within the North Dakota portion of the Williston Basin (Table 2-25) (Anderson, 2016). Of these 13 seismic events, only three occurred along one of the eight interpreted Precambrian basement faults in the North Dakota portion of the Williston Basin (Figure 2-63). The seismic event recorded closest to the Tundra SGS storage facility area occurred 39.6 mi from the J-ROC1 well near Huff, North Dakota (Table 2-25). The magnitude of this seismic event is estimated to have been 4.4.

Table 2-25. Summary of Seismic Events Reported to Have Occurred in North Dakota (from Anderson, 2016)

Date	Magnitude	Depth, mi	Longitude	Latitude	City or Vicinity of Seismic Event	Map Label	Distance to Tundra SGS J-ROC1 Well, mi
Sept 28, 2012	3.3	0.4*	-103.48	48.01	Southeast of Williston	A	124.6
June 14, 2010	1.4	3.1	-103.96	46.03	Boxelder Creek	B	149.1
March 21, 2010	2.5	3.1	-103.98	47.98	Buford	C	144.1
Aug 30, 2009	1.9	3.1	-102.38	47.63	Ft. Berthold Southwest	D	67.4
Jan. 3, 2009	1.5	8.3	-103.95	48.36	Grenora	E	156.0
Nov 15, 2008	2.6	11.2	-100.04	47.46	Goodrich	F	61.6
Nov 11, 1998	3.5	3.1	-104.03	48.55	Grenora	G	166.5
March 9, 1982	3.3	11.2	-104.03	48.51	Grenora	H	164.9
July 8, 1968	4.4	20.5	-100.74	46.59	Huff	I	39.6
May 13, 1947	3.7**	U	-100.90	46.00	Selfridge	J	74.9
Oct 26, 1946	3.7**	U	-103.70	48.20	Williston	K	140.2
April 29, 1927	0.2**	U	-102.10	46.90	Hebron	L	43.4
Aug 8, 1915	3.7**	U	-103.60	48.20	Williston	M	136.4

* Estimated depth.

** Magnitude estimated from reported modified Mercalli intensity (MMI) value.

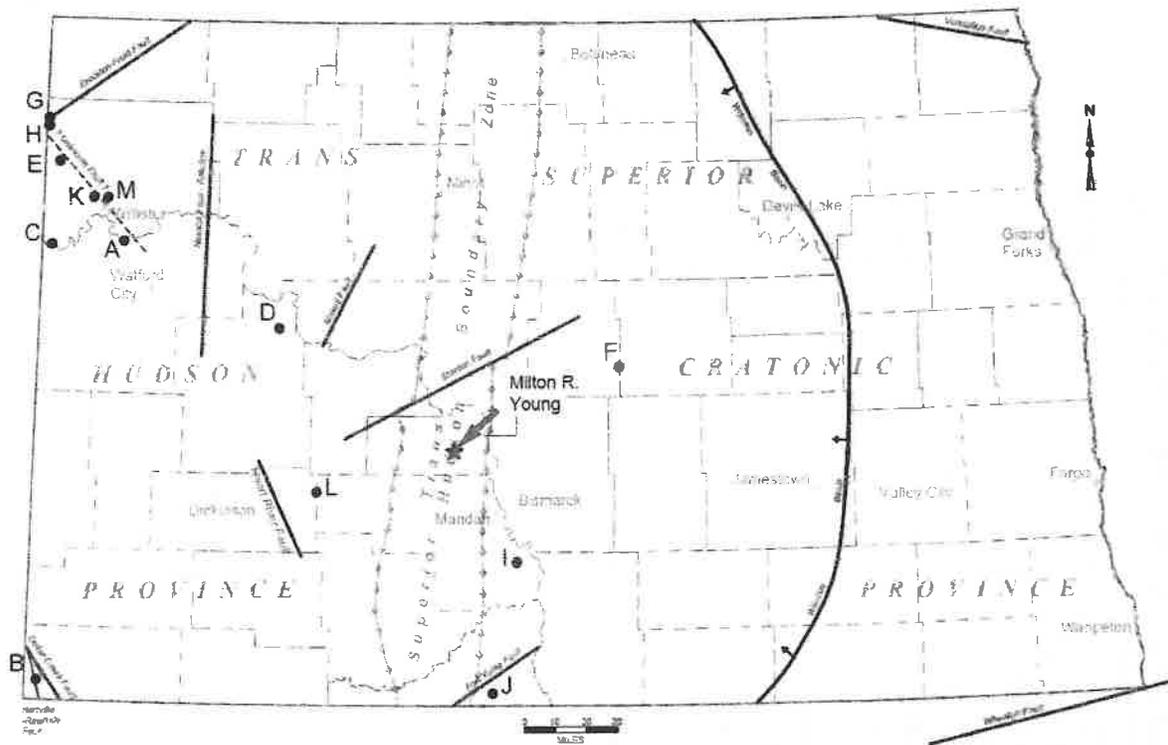


Figure 2-63. Location of major faults, tectonic boundaries, and seismic events in North Dakota (modified from Anderson, 2016). The black dots indicate seismic event locations listed in Table 2-24.

Studies completed by the U.S. Geological Survey (USGS) indicate there is a low probability of damaging seismic events occurring in North Dakota, with less than two damaging seismic events predicted to occur over a 10,000-year time period (Figure 2-64) (U.S. Geological Survey, 2019). A 1-year seismic forecast (including both induced and natural seismic events) released by USGS in 2016 determined North Dakota has very low risk (less than 1% chance) of experiencing any seismic events resulting in damage (U.S. Geological Survey, 2016). Frohlich and others (2015) state there is very little seismic activity near the injection wells in the Williston Basin. They noted only two historic seismic events in North Dakota that could be associated with nearby oil and gas activities. These results indicate relatively stable geologic conditions in the region surrounding the potential injection site. Based on the review and assessment of 1) the USGS studies, 2) the characteristics of the Black Island and Deadwood injection zone and upper and lower confining zones, 3) the low risk of induced seismicity due to the basin stress regime, and 4) the history of recorded seismic events, seismic activity is not expected to interfere with containment of the maximum volume of CO₂ proposed to be injected annually over the life of this project.

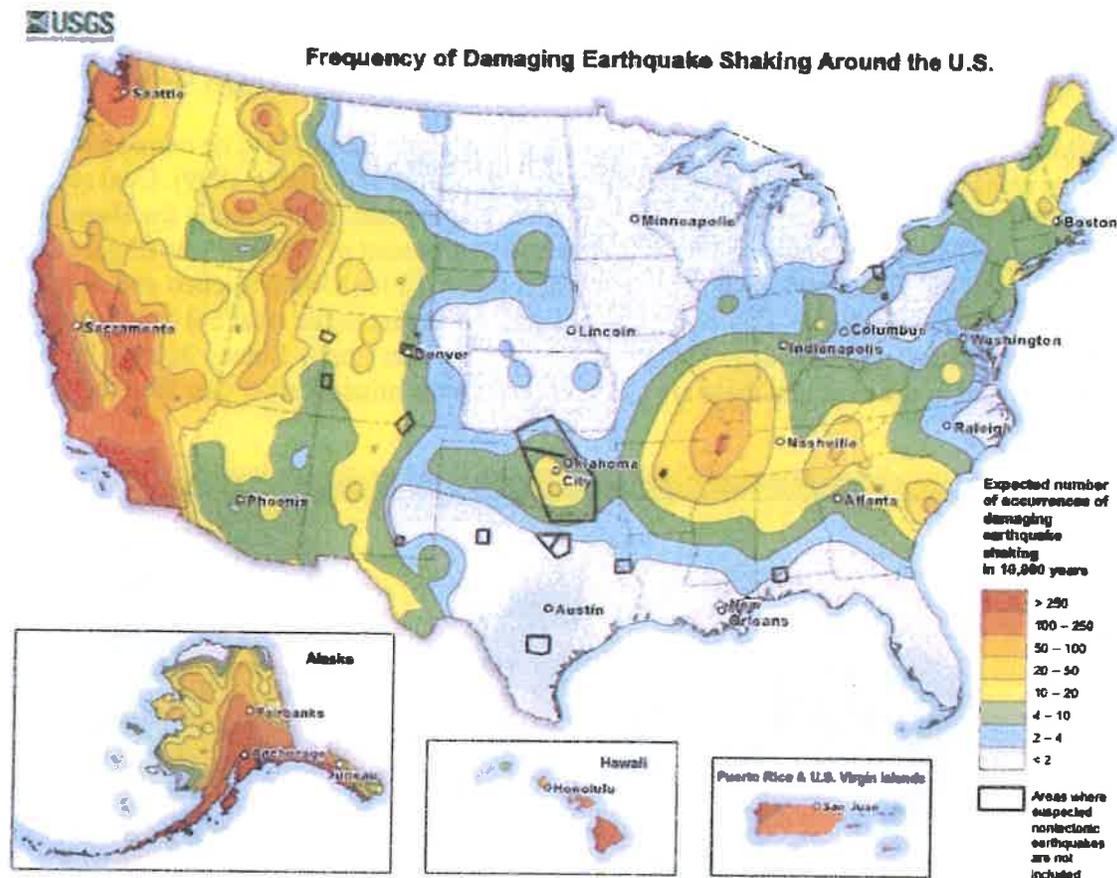


Figure 2-64. Probabilistic map showing how often scientists expect damaging seismic event shaking around the United States (U.S. Geological Survey, 2019). The map shows there is a low probability of damaging seismic events occurring in North Dakota.

2.6 Potential Mineral Zones

There has been no historic hydrocarbon exploration in, or production from, formations above the Deadwood Formation in the storage facility area. The only hydrocarbon exploration well near the storage facility area, the Herbert Dresser 1-34 (NDIC File No. 4937), was drilled in 1970 to explore potential hydrocarbons in the Charles Formation. The well was dry and did not suggest the presence of hydrocarbons. There are no known producible accumulations of hydrocarbons in the storage facility area.

Shallow gas resources can be found in many areas of North Dakota. North Dakota regulations define shallow gas resources as “gas produced from a zone that consists of strata or formation, including lignite or coal strata or seam, located above the depth of five thousand feet (1,524 meters) below the surface, or located more than five thousand feet (1,524 meters) below the surface but above the top of the Rierdon Formation (Jurassic), from which gas may be produced.”

Lignite coal currently is mined in the area of the Center coal mine, operated by BNI Coal. The Center Mine currently mines the Hagel coal seam for use as fuel at Minnkota's MRYS. The Hagel coal seam is the lowermost major lignite present in the area in the Sentinel Butte Formation.

Thickness of the Hagel coal seam averages 7.8 ft in the area permitted to be mined but varies, with some areas exceeding 10 ft in thickness (Figure 2-65) (Ellis and others, 1999). Coal seams in the Bullion Creek Formation exist in the area below the Hagel seam, but currently the Hagel is the only economically minable seam with its thickness and overburden of 100 ft or less (Figure 2-66). The thickness of the Hagel and other coal seams in the Fort Union Group thicken and deepen to the west. The overlying Beulah-Zap coal seam pinches out farther to the west but is economically minable in the central part of Mercer County at North American Coal's Coteau Mine. The Hagel seam pinches out to the east, and there are no other coal seams mined farther east than the Hagel.

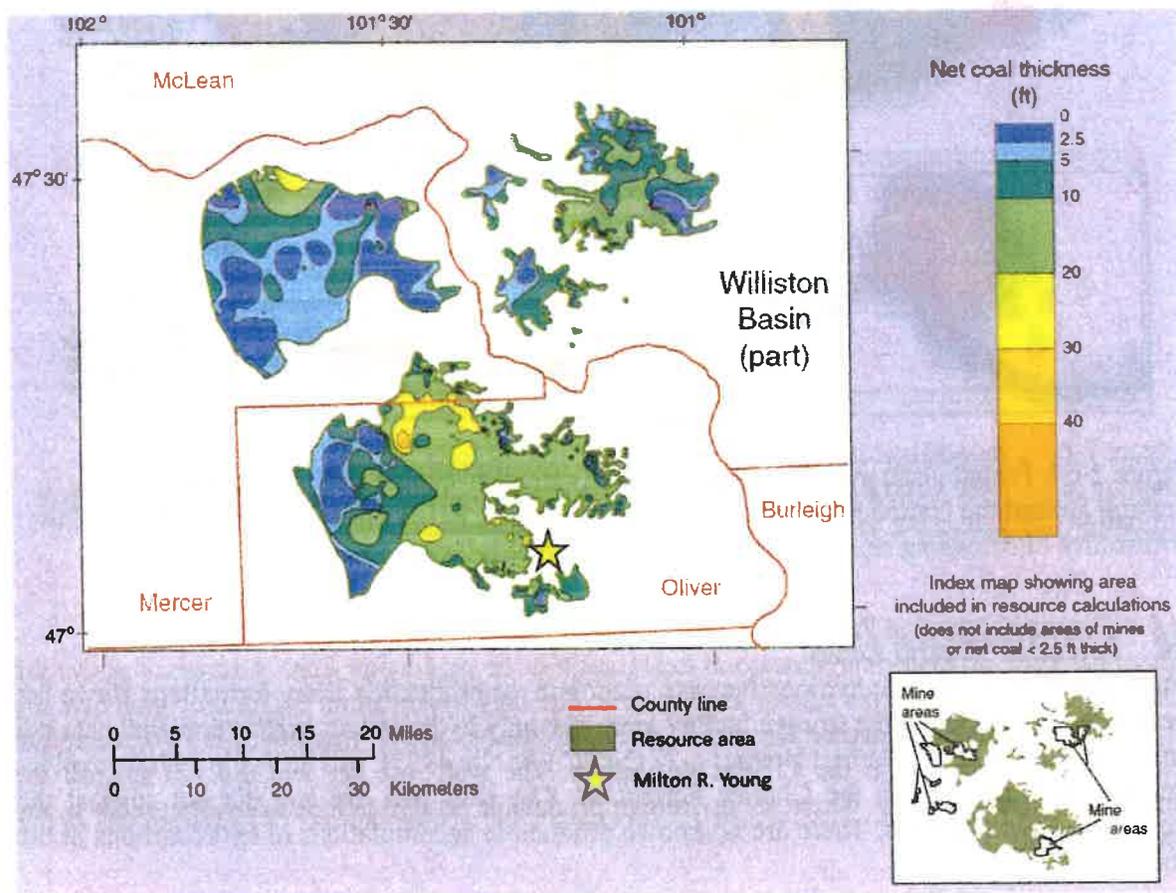


Figure 2-65. Hagel net coal isopach map (modified from Ellis and others, 1999).

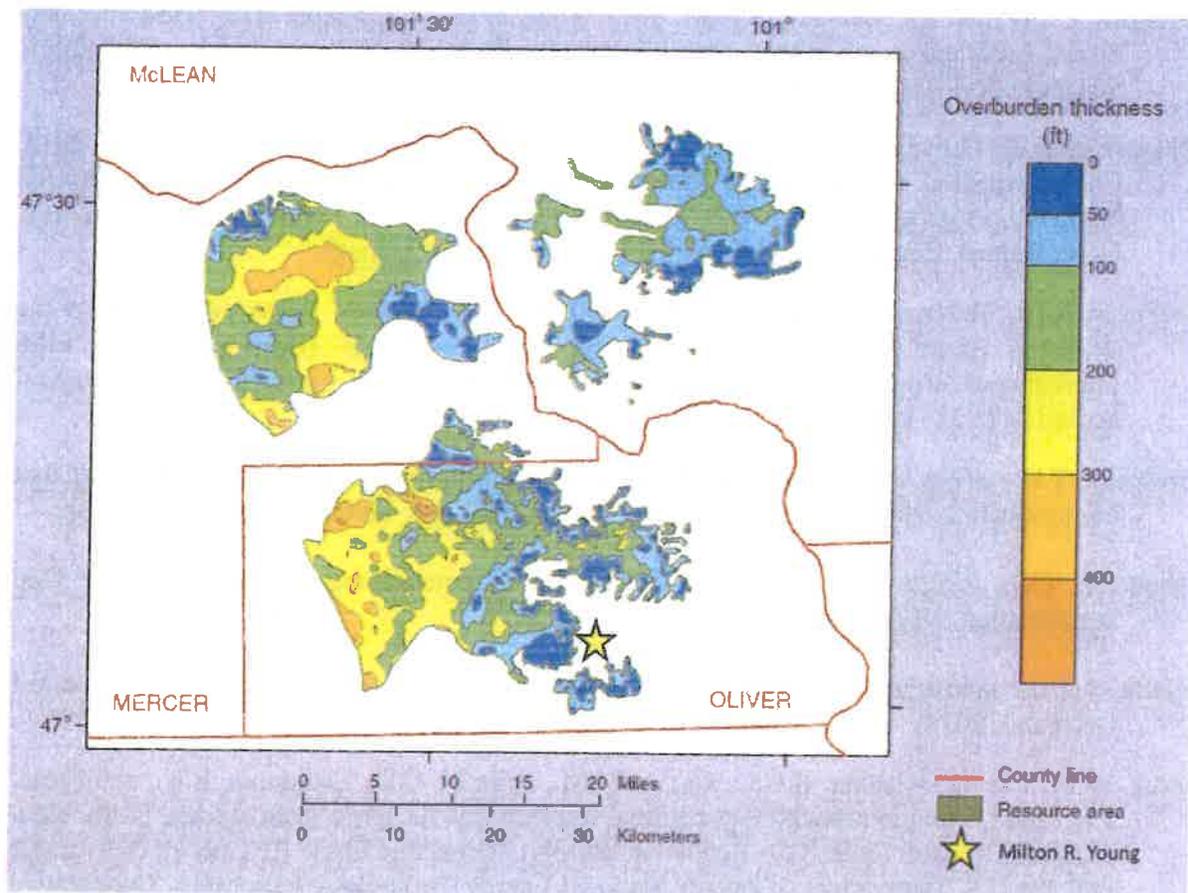


Figure 2-66. Hagel overburden isopach map (modified from Ellis and others, 1999).

2.7 References

- Anderson, F.J., 2016, North Dakota earthquake catalog (1870–2015): North Dakota Geological Survey Miscellaneous Series No. 93.
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3.0 AREA OF REVIEW

3.1 Area of Review Delineation

3.1.1 Written Description

North Dakota carbon dioxide (CO₂) storage regulations require that each storage facility permit delineate an area of review (AOR), which is defined as “the region surrounding the geologic storage project where underground sources of drinking water (USDWs) may be endangered by the injection activity” (North Dakota Administrative Code [NDAC] § 43-05-01-01[4]). Concern regarding the endangerment of USDWs is related to the potential vertical migration of CO₂ and/or brine from the injection zone to the USDW. Therefore, the AOR encompasses the region overlying the injected free-phase CO₂ and the region overlying the extent of formation fluid pressure (Figure 3-1) increase sufficient to drive formation fluids (e.g., brine) into USDWs, assuming pathways for this migration (e.g., abandoned wells or fractures) are present. The minimum fluid pressure increase in the reservoir that results in a sustained flow of brine upward into an overlying drinking water aquifer is referred to as the “critical threshold pressure increase” and resultant pressure as the “critical threshold pressure.” Application of the U.S. Environmental Protection Agency (EPA) method shows the critical threshold pressure increase at the top of the Deadwood Formation using site-specific data from J-ROC1 was determined to be 127 psi (Appendix A, Table A-4).

Appendix A includes a detailed discussion on the computational modeling and simulations (e.g., CO₂ plume extent, pressure front, AOR boundary, etc.), assumptions, and justification used to delineate the AOR and method for delineation of the AOR.

NDAC § 43-05-01-05 subsection 1(b)(3) requires, “A review of the data of public record, conducted by a geologist or engineer, for all wells within the facility area, which penetrate the storage reservoir or primary or secondary seals overlying the reservoir, and all wells within the facility area and within one mile [1.61 kilometers], or any other distance as deemed necessary by the commission, of the facility area boundary.” Based on the computational methods used to simulate CO₂ injection activities and associated pressure front (Figure 3-1), the resulting AOR for Tundra SGS is delineated as being 1 mi beyond the storage facility area boundary. This extent ensures compliance with existing state regulations.

All wells located in the AOR that penetrate the storage reservoir and its primary overlying seal were evaluated (Figures 3-2 through 3-5) by a professional engineer pursuant to NDAC § 43-05-01-05 subsection 1(b)(3). The evaluation was performed to determine if corrective action is required and included a review of all available well records (Table 3-1). The evaluation determined that all abandoned wells within the AOR have sufficient isolation to prevent formation fluids or injected CO₂ from vertically migrating outside of the storage reservoir or into USDWs and that no corrective action is necessary (Tables 3-2 through 3-5 and Figures 3-6 through 3-8).

An extensive geologic and hydrogeologic characterization performed by a team of geologists from the Energy & Environmental Research Center (EERC) resulted in no evidence of transmissive faults or fractures in the upper confining zone within the AOR and revealed that the upper confining zone has sufficient geologic integrity to prevent vertical fluid movement. All geologic data and investigations indicate the storage reservoir within the AOR has sufficient

containment and geologic integrity, including geologic confinement above and below the injection zone, to prevent vertical fluid movement.

This section of the storage facility permit application is accompanied by maps and tables that include information required and in accordance with NDAC §§ 43-05-01-05 subsections 1(a) and 1(b) and 43-05-01-05.1 subsection 2, such as the storage facility area, location of any proposed injection wells or monitoring wells, presence of significant surface structures or land disturbances, and location of water wells and any other wells within the AOR. Table 3-1 lists all the surface and subsurface features that were investigated as part of the AOR evaluation, pursuant to NDAC §§ 43-05-01-05 subsections 1(a) and 1(b)(3) and 43-05-01-05.1 subsection 2. Surface features that were investigated but not found within the AOR boundary were identified in Table 3-1.

3.1.2 Supporting Maps

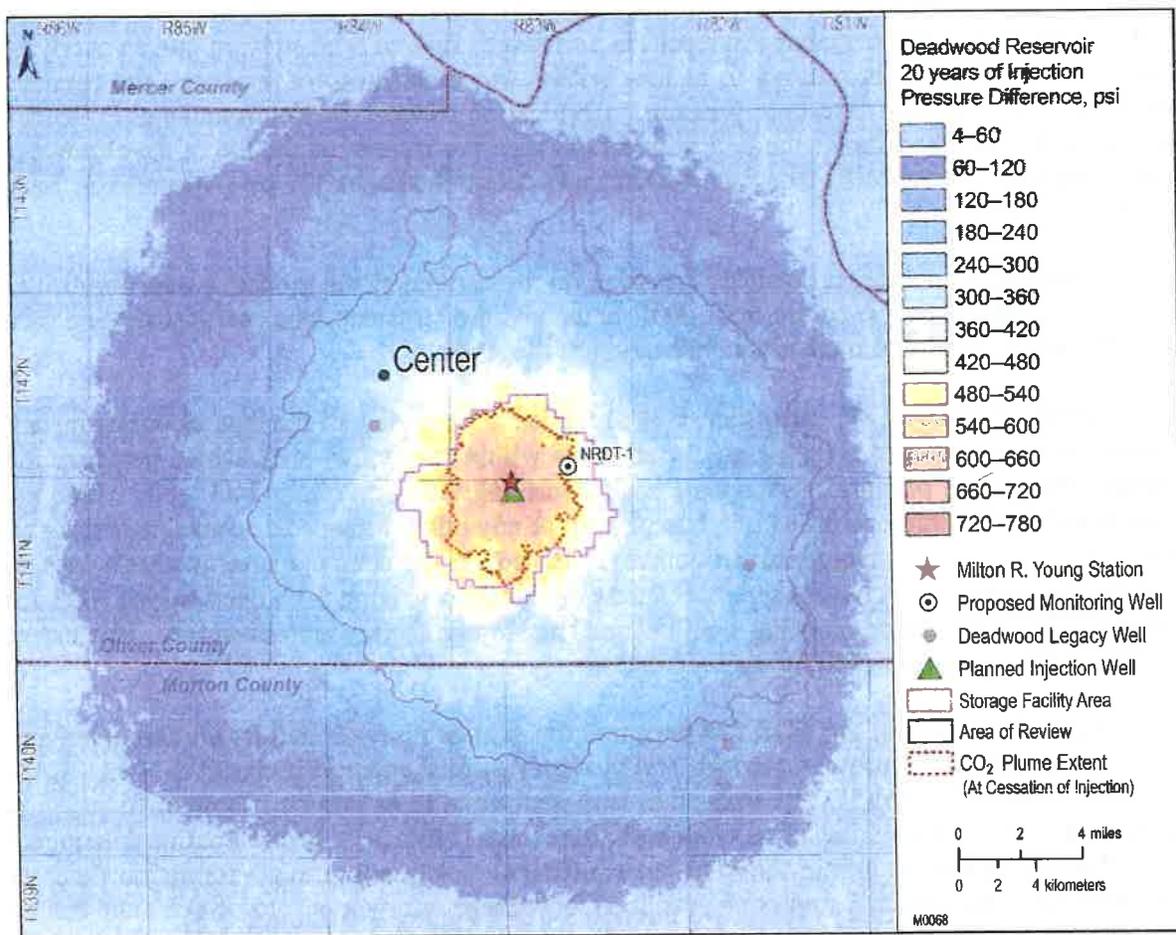


Figure 3-1. Pressure map showing the subsurface pressure influence associated with CO₂ injection in the Deadwood Formation. Shown is the CO₂ plume extent after 20 years of injection, storage facility area, and AOR boundary in relation to the subsurface pressure influence. Subsurface pressure subsides at the cessation of injection.

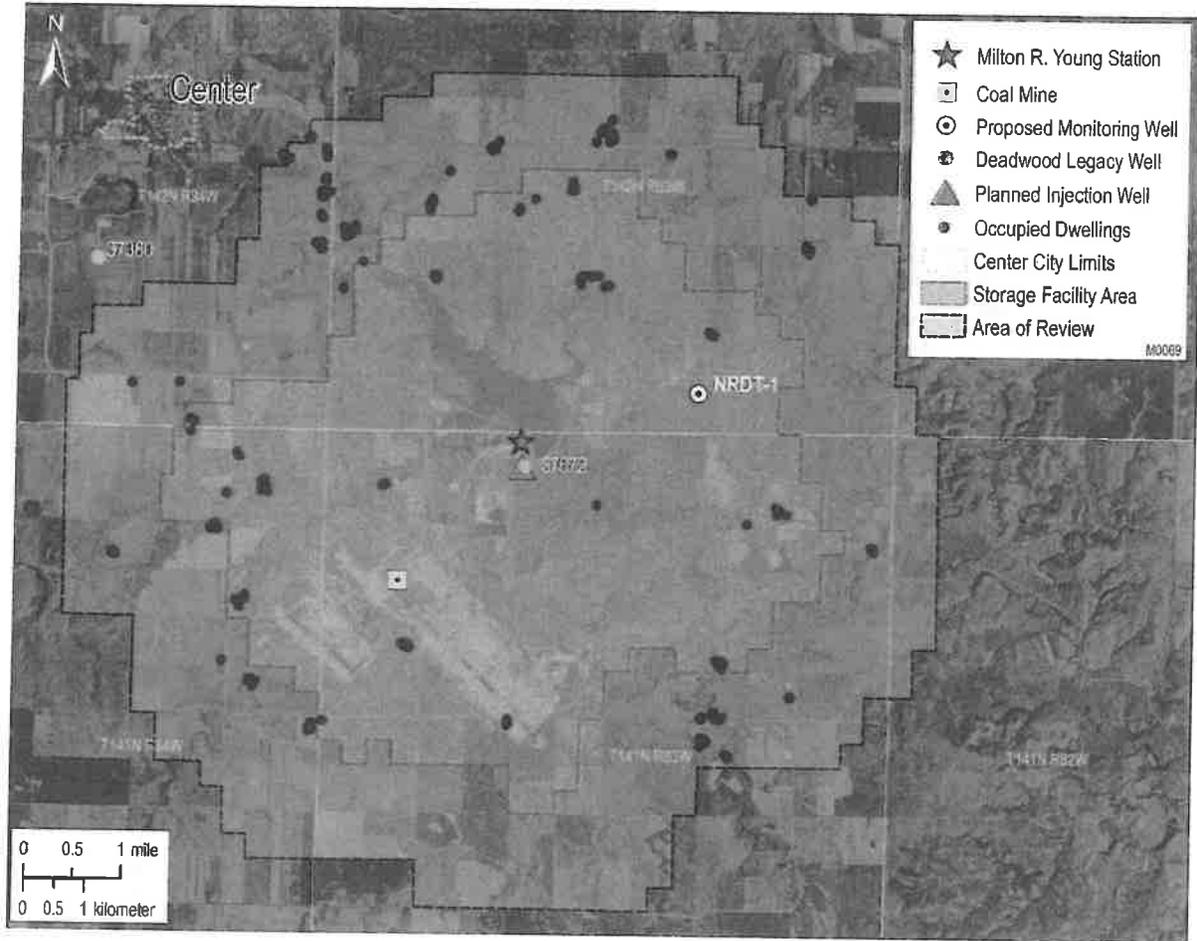


Figure 3-2. Final AOR map showing the storage facility area and AOR boundaries. The black circles represent occupied dwellings, and yellow boundaries represent buildings.

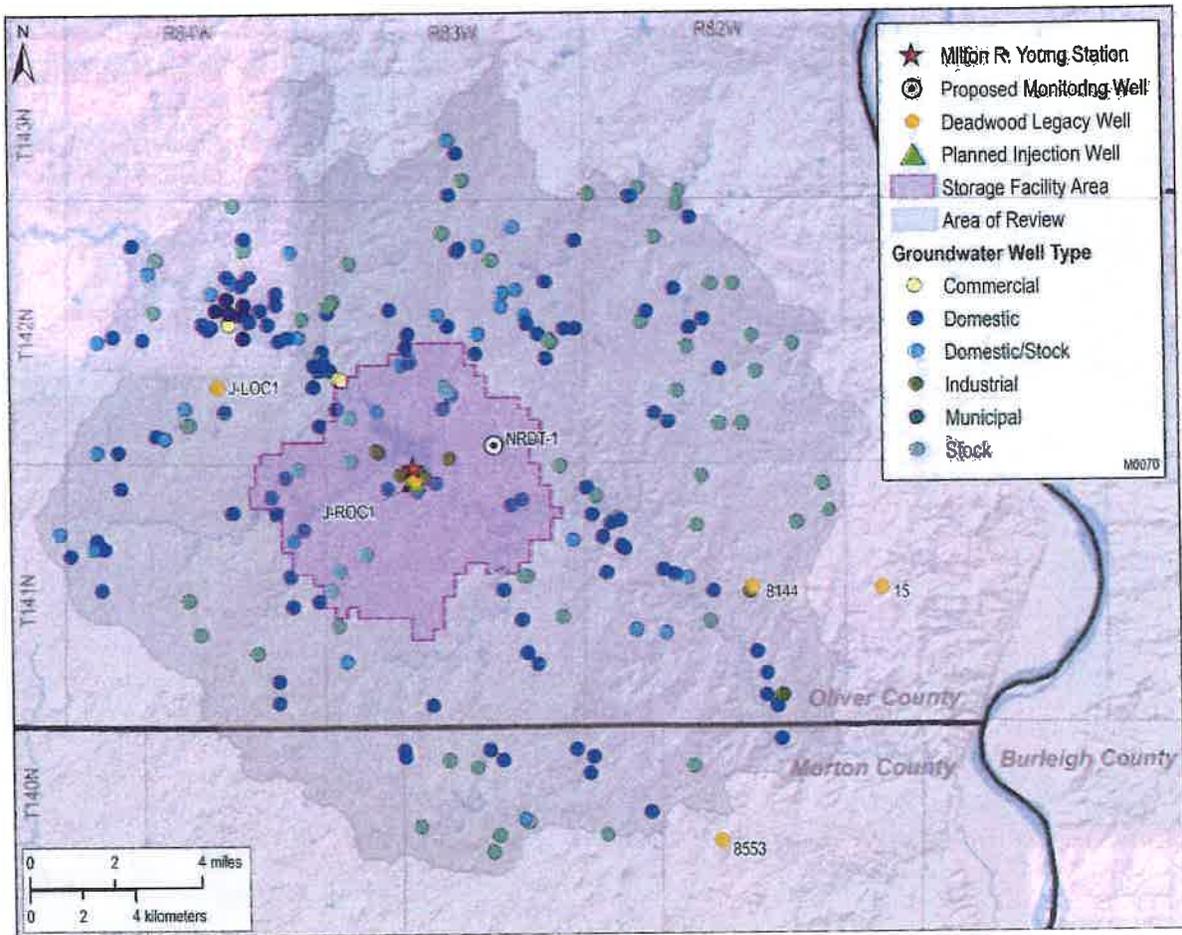


Figure 3-3. AOR map in relation to nearby legacy wells and groundwater wells. Shown are the storage facility area and AOR boundaries.

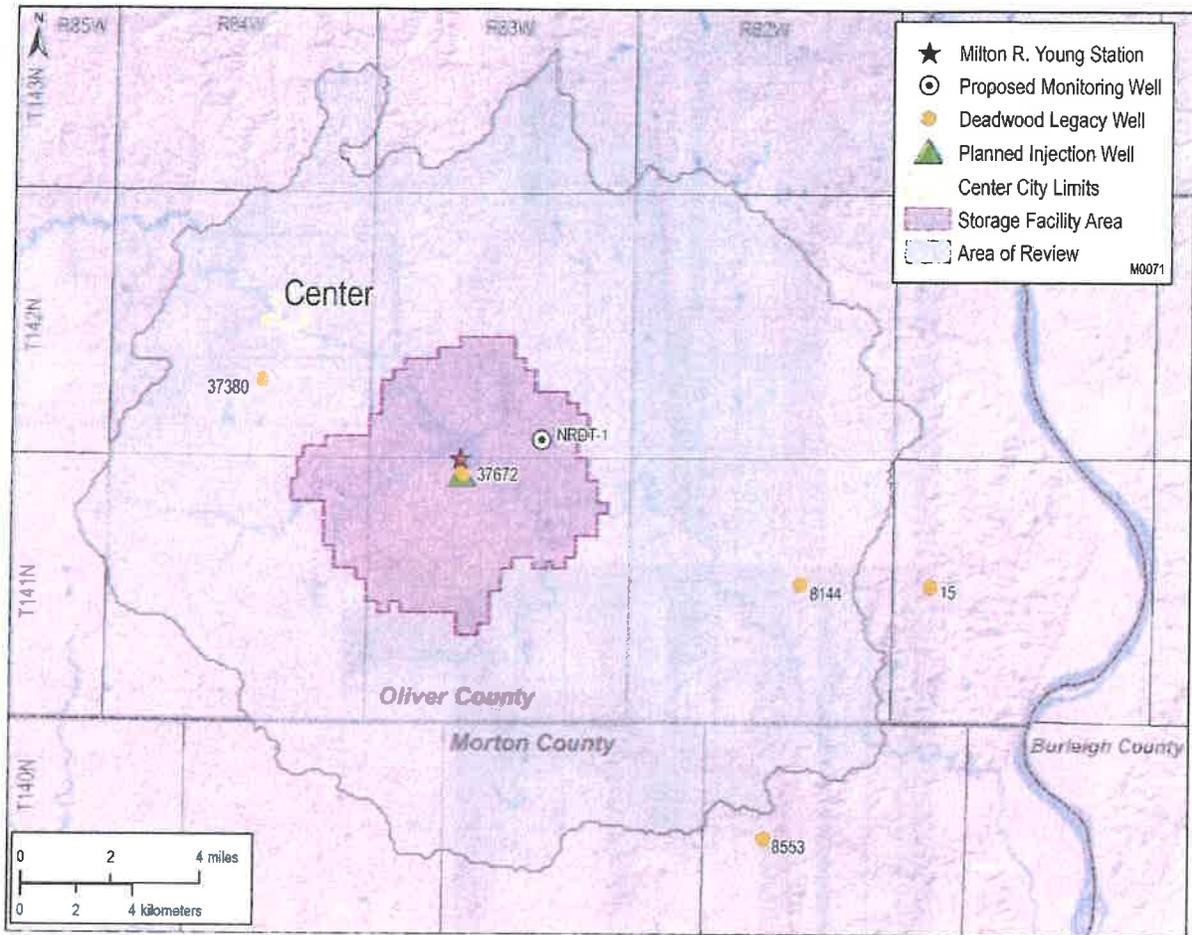


Figure 3-4. The AOR map in relation to nearby legacy wells. Shown are the storage facility area (purple boundary), Center city limits (yellow dotted boundary), and AOR (gray boundary). Orange circles represent nearby legacy wells near the project area, including within the AOR.

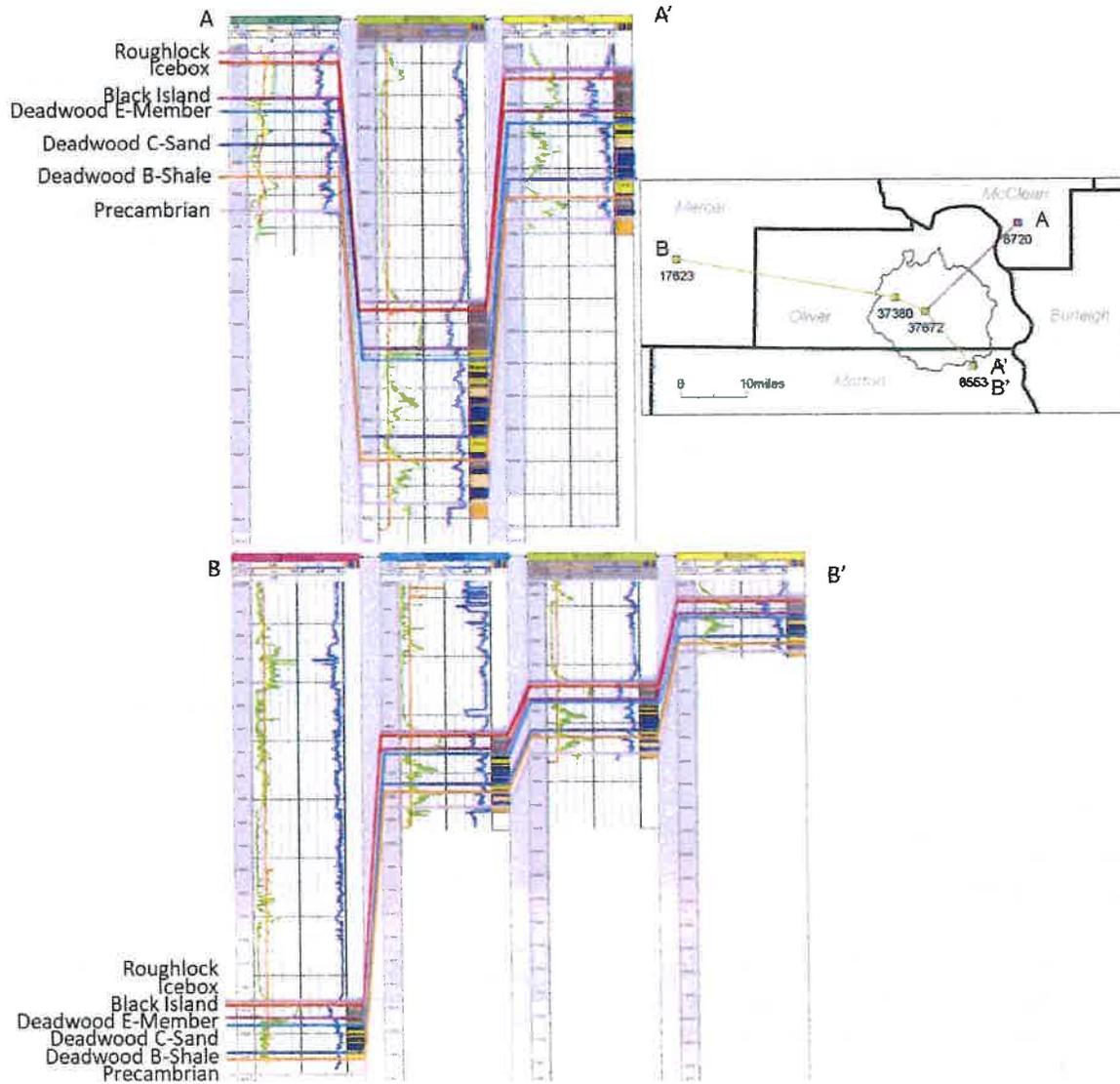


Figure 3-5. Regional well log cross sections showing the structure of the Roughlock, Icebox, Black Island, and Deadwood Formations and the Precambrian basement with an inset map demonstrating the location of the J-LOC1 and J-ROC1 wells. Logs displayed in tracks from left to right are 1) gamma ray (GR, green) and caliper (orange) and 2) delta time (blue), and 3) interpreted lithology log.

Table 3-1. Investigated and Identified Surface and Subsurface Features (Figures 3-1 through 3-5)

Surface and Subsurface Features	Investigated and Identified (Figures 3-1 through 3-5)	Investigated But Not Found in AOR
Producing (active) Wells		X
Abandoned Wells	X	
Plugged Wells or Dry Holes	X	
Deep Stratigraphic Boreholes	X	
Subsurface Cleanup Sites		X
Surface Bodies of Water	X	
Springs	X	
Water Wells	X	
Mines (surface and subsurface)	X	
Quarries		X
Subsurface Structures (e.g., coal mines)	X	
Location of Proposed Wells	X	
*Location of Proposed Cathodic Protection Boreholes	X	
Any Existing Aboveground Facilities		X
Roads	X	
State Boundary Lines		X
County Boundary Lines	X	
Indian Boundary Lines		X
**Other Pertinent Surface Features	X	

* Cathodic protection is planned with location TBD.

** Center, North Dakota, city limit boundary.

3.2 Corrective Action Evaluation

Table 3-2. Wells in AOR Evaluated for Corrective Action

NDIC ¹ Well File No.	Operator	Well Name	Spud Date	Surface Casing OD, in.	Surface Casing Seat, ft	Long-String Casing, in.	Hole Direction	TD, ² ft	TVD, ³ ft	Status	Plug Date	TWN	RNG	Section	Qtr/Qtr	County	Corrective Action Needed
8144	Pennzoil Co.	Little Boot 15-44	2/14/1981	8.625	2,014	Openhole	Vertical	8,655	8,655	P&A	4/1/1981	141 N	82 W	15	SE/SE	Oliver	No
37672	Minnkota Power Cooperative, Inc. (Minnkota)	J-ROC1	9/8/2020	13.375	2,000	Openhole	Vertical	9,871	9,871	TA	10/27/2020	141 N	83 W	4	SW/NW	Oliver	No
37380	Minnkota	J-LOC1	5/14/2020	9.625	1,654	5.5	Vertical	10,470	10,470	TA	12/19/2020	141 N	83 W	27	SW/NE	Oliver	No

¹ North Dakota Industrial Commission.

² Total depth.

³ True vertical depth.

Table 3-3. Little Boot 15-44 (NDIC File No. 8144) Well Evaluation

Well Name: Little Boot 15-44 (NDIC File No. 8144)

3-9

Cement Plugs				
Number	Interval (ft)		Thickness (ft)	Volume (sacks)
1	8,500	8,600	100	35
2	7,720	7,820	100	35
3	7,200	7,300	100	35
4	6,500	6,600	100	35
5	5,450	5,550	100	35
6	5,050	5,150	100	35
7	4,300	4,500	200	100
8	1,587	2,800	1,213	424
9	2	12	10	10

Formation		Cement Plug Remarks
Name	Estimated Top (ft)	
Pierre	1,375	Cement Plug 9 isolates the surface.
8 $\frac{5}{8}$ " Casing Shoe	2,014	Cement Plug 8 isolates the surface casing shoe and above the Mowry Formation.
Greenhorn	2,803	
Mowry	3,177	Cement Plug 7 isolates below the Mowry and Inyan Kara Formations
Inyan Kara	3,434	
Swift	3,651	
Rierdon	4,038	
Broom Creek	4,400	Cement Plug 7 isolates above the Broom Creek Formation.
Kibbey Lime	5,051	
Icebox	8,440	Cement Plug 2 isolates above the Icebox and Deadwood Formations.
Deadwood	8,587	Cement Plug 1 isolates above the Deadwood Formation.

Spud Date: 2/14/1981
 Total Depth: 8,655 ft (Deadwood Formation)

Surface Casing:
 8 $\frac{5}{8}$ " 36# K-55 casing set at 2,014 ft, cement to surface with 935 sacks Class G cement.

Openhole P&A

Corrective Action: No corrective action is necessary. The Deadwood Formation is isolated mechanically by a series of balanced cement plugs and is located near the outside edge of the AOR. Monitoring at this location may be necessary depending on actual plume growth.

Table 3-4. J-ROC1 (NDIC File No. 37672) Well Evaluation

Well Name: J-ROC1 (NDIC File No. 37672)

3-10

Cement Plugs				
Number	Interval (ft)		Thickness (ft)	Volume (sacks)
1	9,030	9,375	345	241
2	7,830	8,550	720	212
3	7,361	7,830	469	272
4	6,516	7,200	684	241
5	5,215	5,600	385	147
6	4,430	4,770	340	160
7	3,400	3,715	315	145
8	1,715	2,050	335	221
9	28	90	62	46

Formation		Cement Plug Remarks
Name	Wireline Top (ft)	
Pierre	1,150	Cement Plug 9 isolates the surface.
13 ³ / ₈ " Casing Shoe	2,000	Cement Plug 8 isolates the surface casing shoe.
Mowry	3,404	Cement Plug 7 isolates above the Inyan Kara Formation.
Inyan Kara	3,686	
Swift	3,865	
Spearfish/Opeche	4,688	Cement Plug 6 isolates above the Broom Creek and Spearfish/Opeche Formations.
Broom Creek	4,740	
Amsden	4,974	
Icebox	9,170	Cement Plug 1 isolates above the Deadwood Formation and is CO ₂ -resistant.
Deadwood	9,316	
Precambrian	9,762	

Spud Date: 9/8/2020
 Total Depth: 9,871 ft (Precambrian Basement)

Surface Casing:
 13³/₈" 61# K-55 casing set at 2,000 ft, cement to surface with 1,207 sacks Class C cement.

Openhole TA

Corrective Action: No corrective action is necessary. The Deadwood Formation is isolated mechanically by a series of conventional and CO₂-resistant balanced cement plugs. Minnkota plans to convert this well into an injection well named Liberty-1 (J-ROC1 NDIC File No. 37672).

Table 3-5. J-LOC1 (NDIC File No. 37380) Well Evaluation

Well Name: J-LOC1 (NDIC File No. 37380)				
Casing Program				
Section	Casing Outside Diameter (OD), in.	Weight, lb/ft	Casing Seat, ft	Grade
Surface	9 $\frac{5}{8}$	40	1,654	K-55
Production	5 $\frac{1}{2}$	23	10,450	L-80
				13Cr-95
Cementing Program				
Casing, in.	Cement Type	TOC, ft	Excess, %	Volume, sacks
9 $\frac{5}{8}$	Class C	Surface	100	728
	Class G	2,920		
5 $\frac{1}{2}$	CO ₂ - resistant	4,952	100	1,160
Completion/Plugging Program				
Item	Description	Length (ft)	Top Depth (ft)	
1	Wireline bailed cement	50	3,929	
2	2AA CICR	1.73	3,979	
3	Perforation	10	4,015	
4	2AA CIBP	1.5	4,069	
5	Wireline bailed cement	50	4,846	
6	2AA CICR	1.73	4,896	
7	Perforation	10	4,912	
8	Wireline bailed cement	50	9,782	
9	2AA CICR	1.73	9,832	
10	Perforation	10	9,880	
Spud Date: 5/14/2020				
Total Depth: 10,470 ft (Precambrian Basement)				
Cased-hole TA				

Formation		
Name	Wireline Top (ft)	Remarks
Pierre	1,250	Surface and production casing and cement behind both strings isolate the surface section.
9 $\frac{5}{8}$ " Casing Shoe	1,654	
Mowry	3,585	Production casing, cement behind the casing, cast iron bridge plug, cast iron cement retainer (CICR), and cement above isolate the Inyan Kara Formation.
Inyan Kara	3,881	
Swift	4,057	
Opeche	4,879	Production casing, CO ₂ -resistant cement behind the casing, CICR and cement above isolate the Broom Creek Formation.
Broom Creek	4,906	
Amsden	5,210	Production casing, CO ₂ -resistant cement behind the casing, CICR and cement above isolate the Deadwood Formation.
Icebox	9,665	
Deadwood	9,821	
Precambrian	10,297	

Corrective Action: No corrective action is necessary. The Deadwood Formation is isolated mechanically by conventional and CO₂-resistant casing and cement. Perforations in the Deadwood, Broom Creek, and Inyan Kara are isolated by CICRs and cement on top. A mechanical integrity test (MIT) was witnessed and approved by North Dakota State Inspector, Jared Thune, on December 21, 2020.

3-11

LITTLE BOOT 15-44

NDIC Well File No. 8144

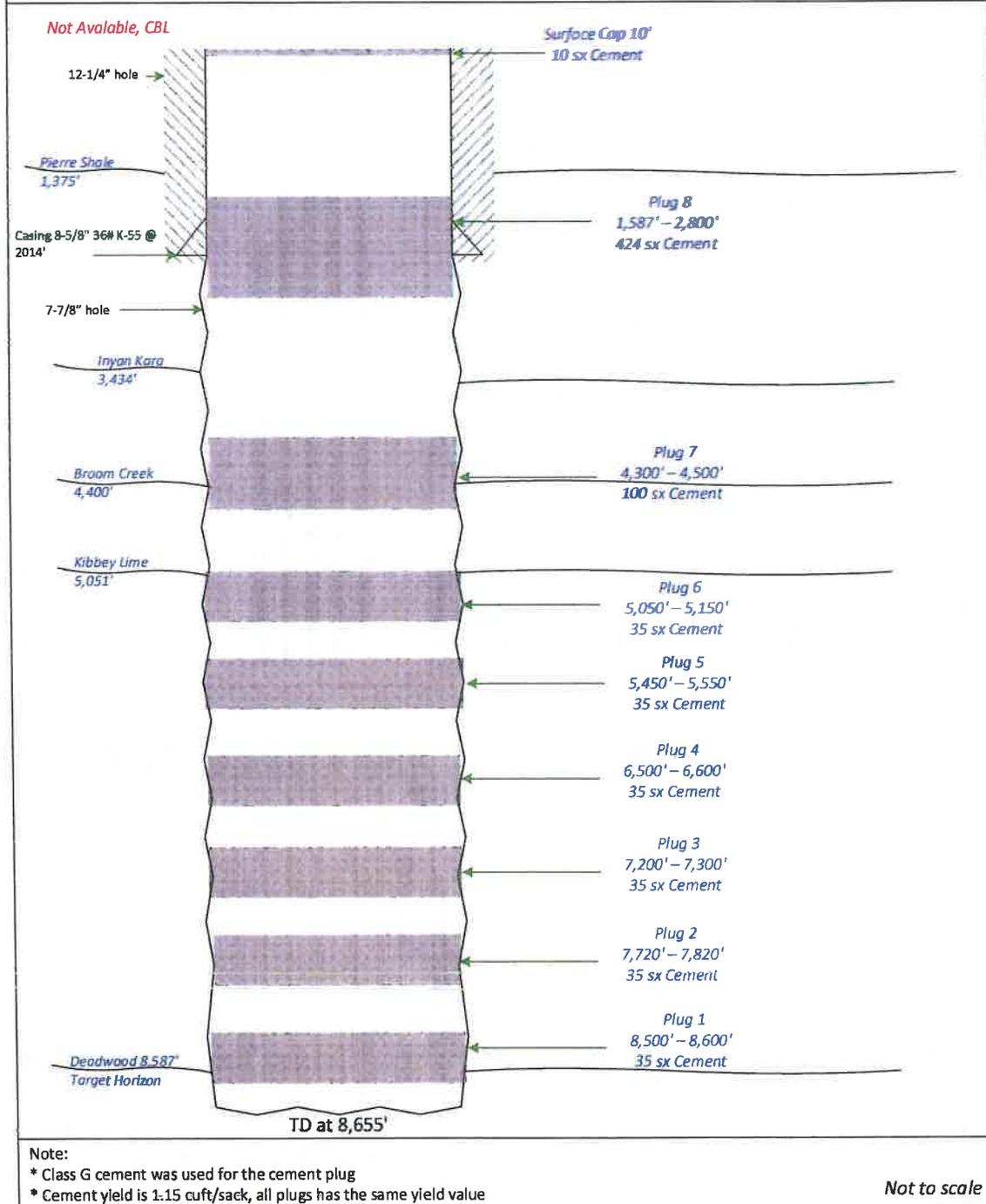


Figure 3-6. Little Boot 15-44 (NDIC File No. 8144) well schematic showing the location and thickness of cement plugs.

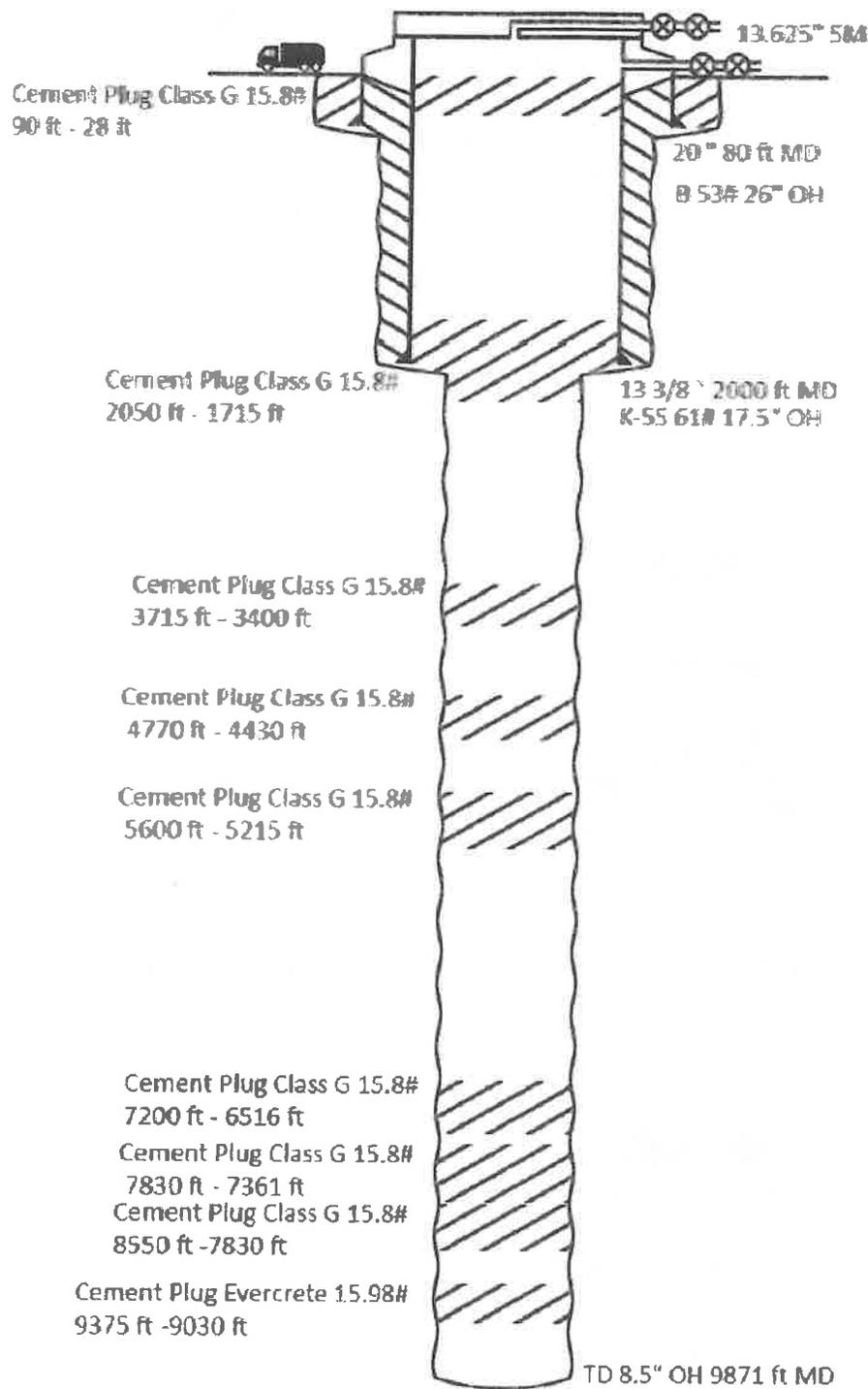


Figure 3-7. J-ROC1 (NDIC File No. 37672) well schematic showing the location and thickness of cement plugs.

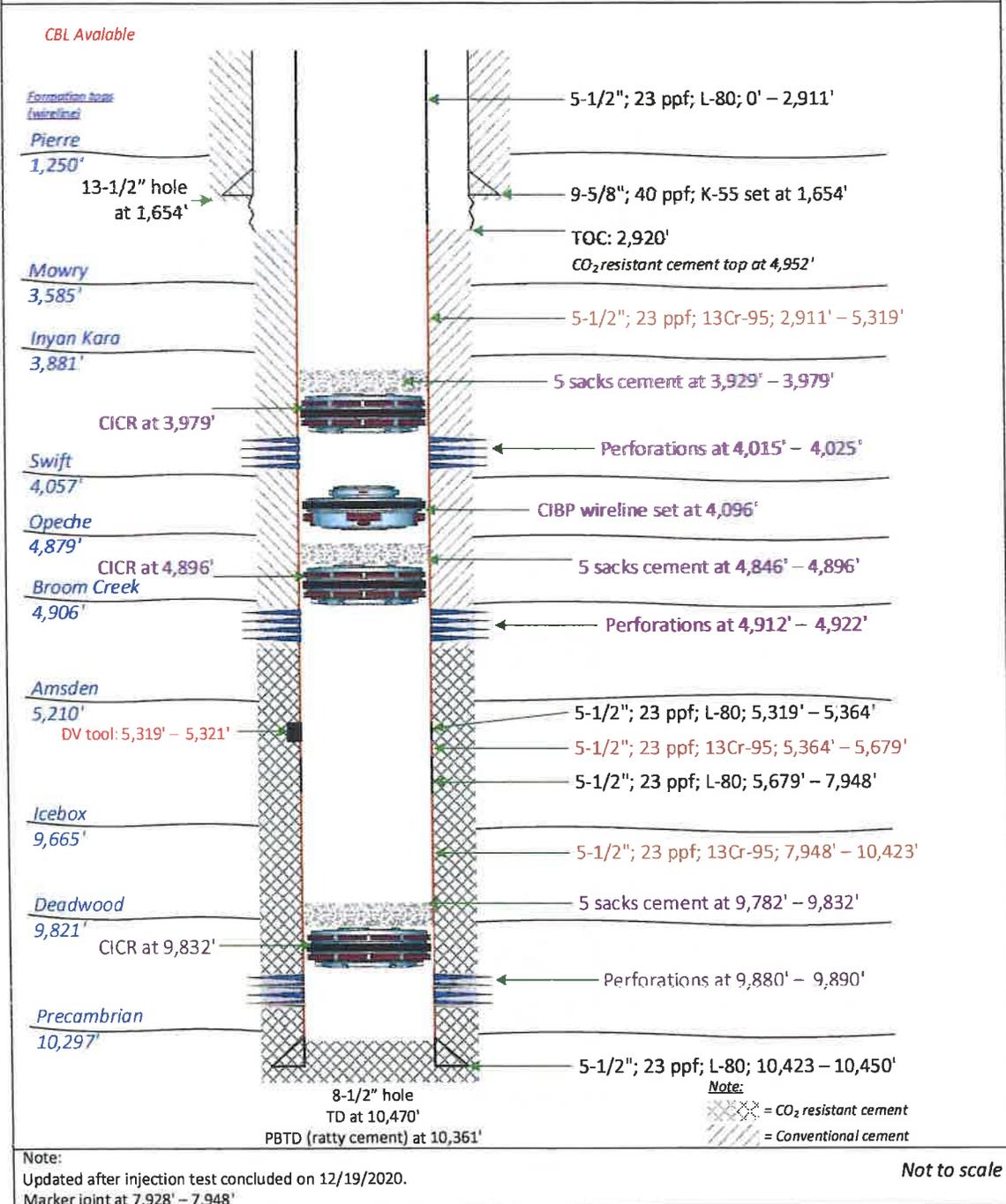


Figure 3-8. J-LOC1 (NDIC File No. 37380) as-constructed well schematic showing the final installation equipment used inside the wellbore to isolate perforations.

3.3 Reevaluation of AOR and Corrective Action Plan

Minnkota will periodically reevaluate the AOR and corrective action plan in accordance with NDAC § 43-05-01-05.1, with the first reevaluation taking place not later than the fifth anniversary of NDIC's issuance of a permit to operate under NDAC § 43-05-01-10 and every fifth anniversary thereafter (each being a Reevaluation Date). The AOR reevaluations will address the following:

- Any changes to the monitoring and operational data prior to the scheduled Reevaluation Date.
- Monitoring and operational data (e.g., injection rate and pressure) will be used to update the geologic model and computational simulations. These updates will then be used to inform a reevaluation of the AOR and corrective action plan, including the computational model that was used to determine the AOR, and operational data to be utilized as the basis for that update will be identified.
- The protocol to conduct corrective action, if necessary, will be conducted, including 1) what corrective action will be performed and 2) how corrective action will be adjusted if there are changes in the AOR.

3.4 Protection of USDWs

3.4.1 Introduction of USDW Protection

The primary confining zone and additional overlying confining zones geologically isolate the Fox Hills Formation, the deepest USDW in the AOR. The Icebox Formation is the primary confining zone with additional confining layers above, which geologically isolates all USDWs from the injection zone (Table 3-6).

3.4.2 Geology of USDW Formations

The hydrogeology of western North Dakota comprises several shallow freshwater-bearing formations of the Quaternary, Tertiary, and upper Cretaceous-aged sediments underlain by multiple saline aquifer systems of the Williston Basin (Figure 3-9). These saline and freshwater systems are separated by the Cretaceous Pierre Shale of the Williston Basin, a regionally extensive shale between 1000 and 1500 ft thick (Thamke and others, 2014).

The freshwater aquifers comprise the Cretaceous Fox Hills and Hell Creek Formations; overlying Cannonball, Tongue River, and Sentinel Butte Formations of Tertiary Fort Union Group; and the Tertiary Golden Valley Formation (Figure 3-10). Above these are undifferentiated alluvial and glacial drift Quaternary aquifer layers, which are not necessarily present in all parts of the AOR (Croft, 1973).

Table 3-6. Description of Zones of Confinement above the Immediate Upper Confining Zone (data based on the J-ROC1 well)

Name of Formation	Lithology	Formation Top Depth, ft	Thickness, ft	Depth below Lowest Identified USDW, ft
Pierre	Shale	1,150	1862	0
Greenhorn	Shale	3,012	391	1,862
Mowry	Shale	3,403	56	2,253
Skull Creek	Shale	3,458	235	2,308
Swift	Shale	3,864	473	2,714
Rierdon	Shale	4,337	147	3,187
Piper (Kline Member)	Limestone	4,484	110	3,334
Piper (Picard)	Shale	4,594	91	3,444
Opeche	Shale/mudstone	4,685	55	3,535
Amsden	Dolostone/anhydrite	4,974	247	3,824
Kibbey Lime	Limestone	5,384	31	4,234
Charles	Limestone/anhydrite	5,526	147	4,376
Bakken	Shale	6,926	10	5,776
Birdbear	Limestone	7,075	74	5,925
Duperow	Limestone/dolostone	7,149	272	5,999
Souris River	Dolostone/limestone	7,421	175	6,271
Dawson Bay	Dolostone	7,596	729	6,446
Gunton	Dolostone/limestone	8,325	39	7,175
Stoughton	Shale/limestone	8,364	91	7,214
Lower Red River	Limestone	8,645	488	7,495
Roughlock	Shale/limestone	9,133	25	7,983

The lowest USDW in the AOR is the Fox Hills Formation, which together with the overlying Hell Creek Formation, is a confined aquifer system. The Hell Creek Formation is a poorly consolidated unit composed of interbedded sandstone, siltstone, and claystones with occasional carbonaceous beds, all fluvial origin. The underlying Fox Hills Formation is interpreted as interbedded nearshore marine deposits of sand, silt, and shale deposited as part of the final Western Interior Seaway retreat (Fischer, 2013). The Fox Hills Formation in the AOR is approximately 700 to 900 ft deep and 200 to 350 ft thick. The structure of the Fox Hills and Hell Creek Formations follows that of the Williston Basin, dipping gently toward the center of the basin to the northwest of the AOR (Figure 3-11).

The Pierre Shale is a thick, regionally extensive shale unit, which forms the lower boundary of the Fox Hills–Hell Creek system, also isolating all overlying freshwater aquifers from the deeper saline aquifer systems. The Pierre shale is a dark gray to black marine shale and is typically 1000 ft thick in the AOR (Thamke and others, 2014).

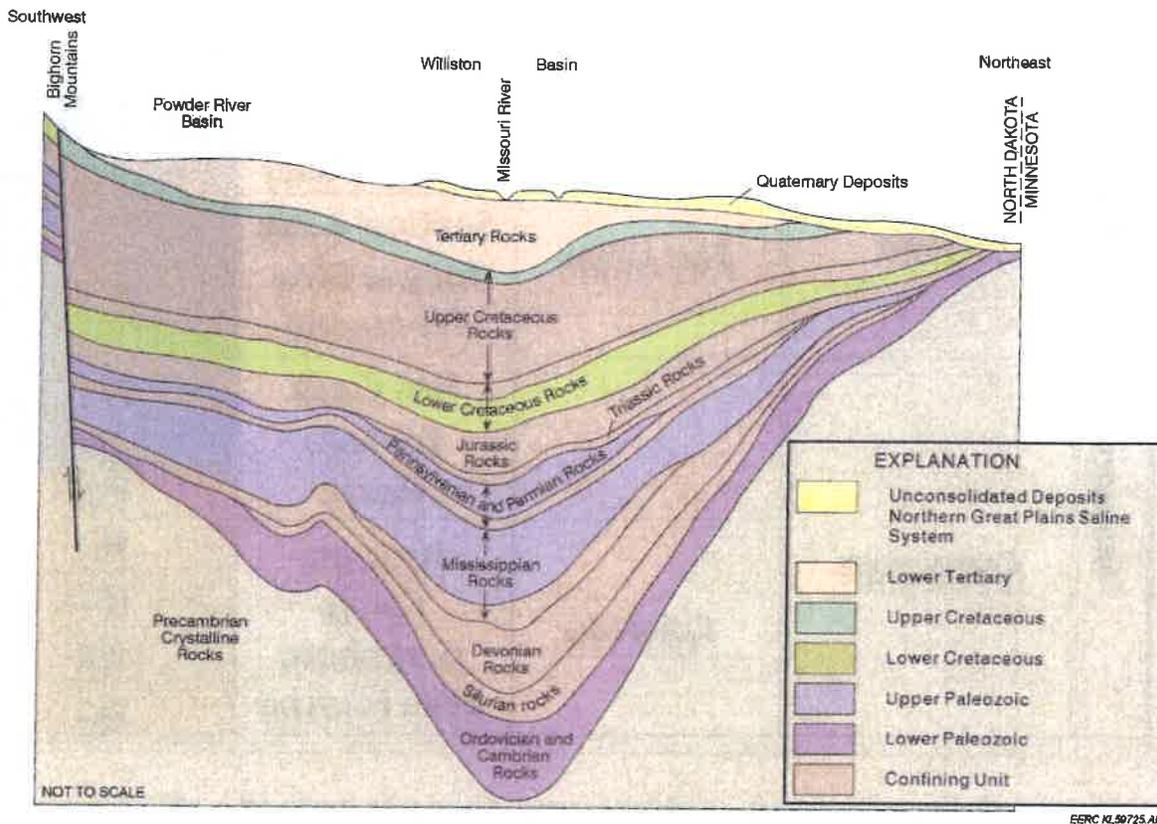


Figure 3-9. Major aquifer systems of the Williston Basin.

Era	Period	Group	Formation	Freshwater Aquifer(s) Present
Cenozoic	Quaternary		Glacial Drift	Yes
	Tertiary		Golden Valley	Yes
		Fort Union	Sentinel Butte	Yes
			Tongue River	Yes
			Cannonball	Yes
Mesozoic	Cretaceous		Hell Creek	Yes
			Fox Hills	Yes
			Pierre	No
		Colorado	Niobrara	No
			Carlile	No
			Greenhorn	No
			Belle Fourche	No

Figure 3-10. Upper stratigraphy of Oliver County showing the stratigraphic relationship of Cretaceous and Tertiary groundwater-bearing formations (modified from Croft, 1973).

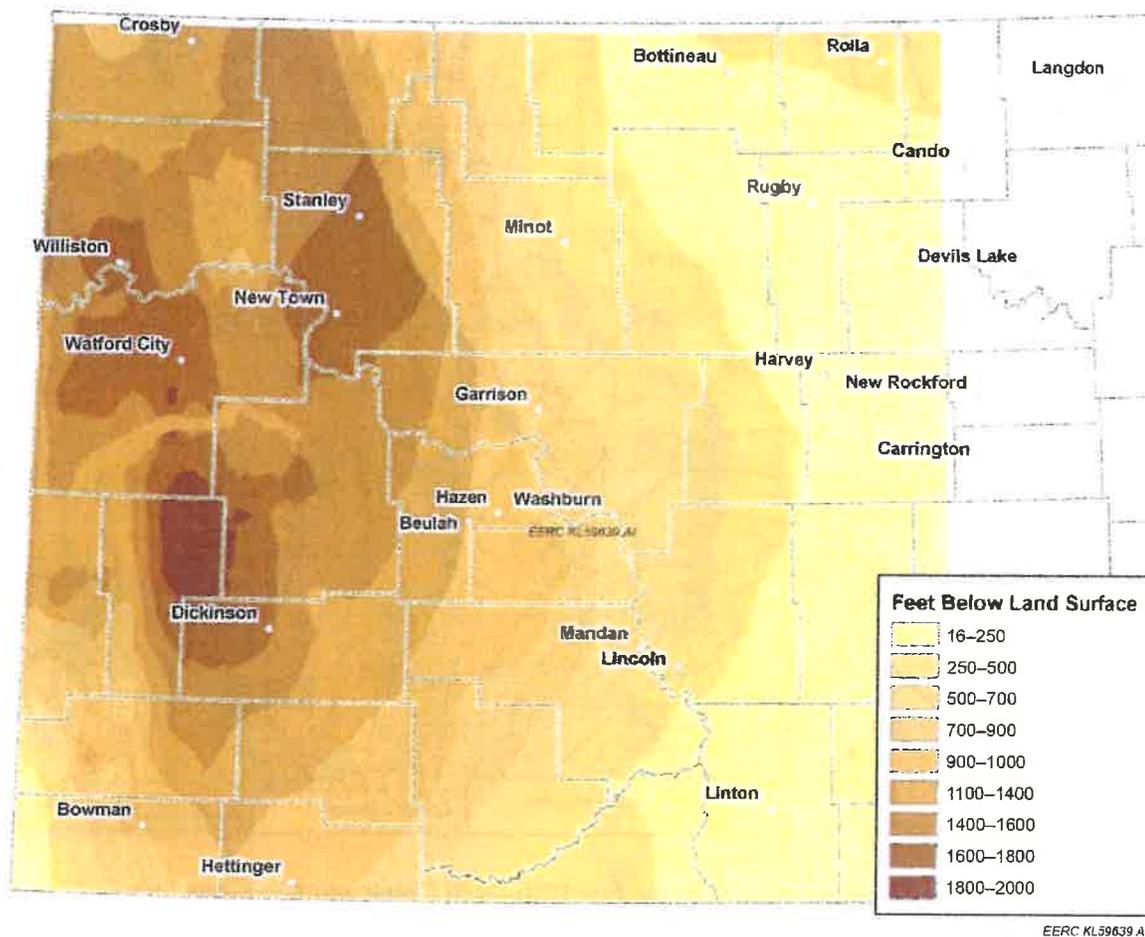


Figure 3-11. Depth to surface of the Fox Hills Formation in western North Dakota (Fischer, 2013).

3.4.3 Hydrology of USDW Formations

The aquifers of the Fox Hills and Hell Creek Formations are hydraulically connected and function as a single confined aquifer system (Fischer, 2013). The Bacon Creek Member of the Hell Creek Formation forms a regional aquitard for the Fox Hills–Hell Creek aquifer system, which isolates it from the overlying aquifer layers. Recharge for the Fox Hills–Hell Creek aquifer system occurs in southwestern North Dakota along the Cedar Creek Anticline and discharges into overlying strata under central and eastern North Dakota (Fischer, 2013). Flow through the AOR is to the east (Figure 3-12). Water sampled from the Fox Hills Formation is a sodium bicarbonate type with a total dissolved solids (TDS) content of approximately 1,500–1,600 ppm. Previous analysis of Fox Hills Formation water has also noted high levels of fluoride, more than 5 mg/L (Trapp and Croft, 1975). As such, the Fox Hills–Hell Creek system is typically not used as a primary source of drinking water. However, it is occasionally produced for irrigation and/or livestock watering.

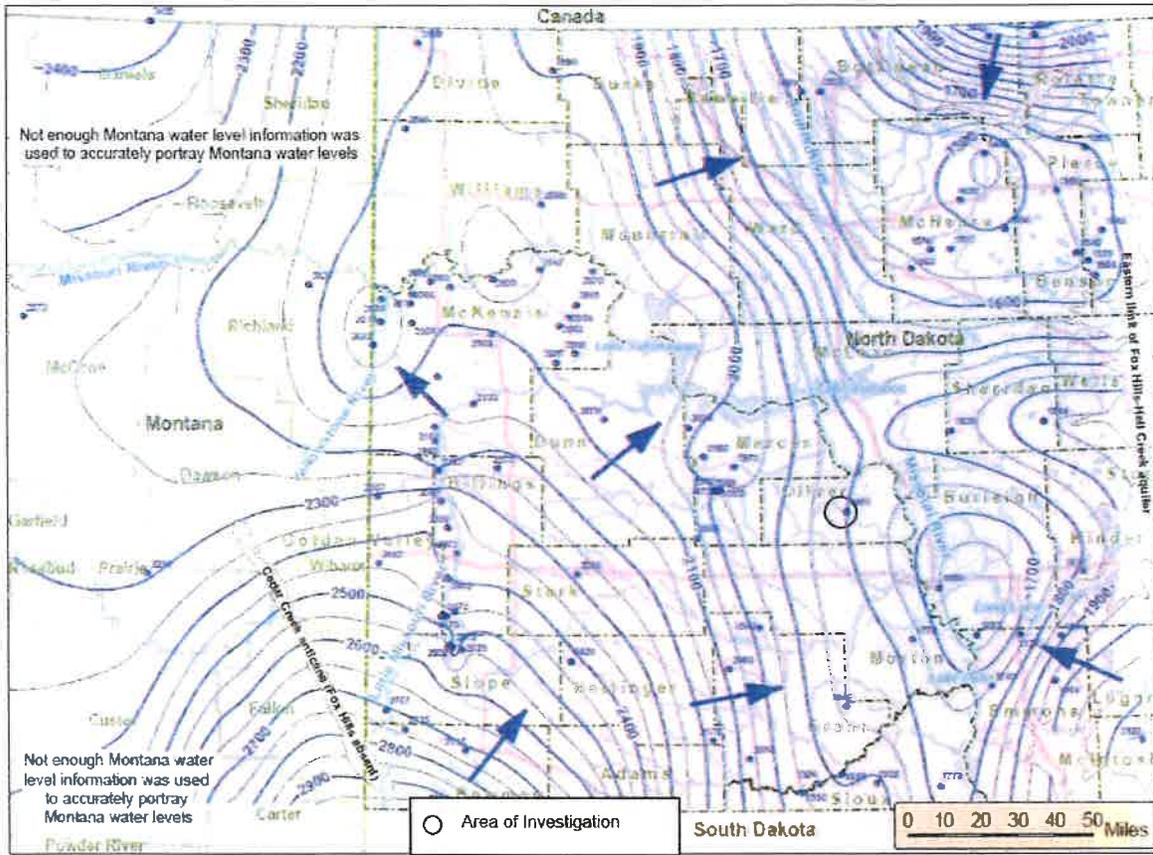


Figure 3-12. Potentiometric surface of the Fox Hills–Hell Creek aquifer system shown in feet of hydraulic head above sea level. Flow is to the northeast through the area of investigation in central Oliver County (modified from Fischer, 2013).

Based on the North Dakota State Water Commission (SWC) database, eight water wells penetrate the Fox Hills Formation in the AOR (Figure 3-13). One observation well monitored by the U.S. Geological Survey is located 1 mi east of Center, North Dakota, nearly 5 mi northwest of the McCall-1 injection site. One well is 5 mi northeast of the injection site along North Dakota Highway 25 and is used for stock. The status of the remaining six wells is under investigation. One well is about 9 mi southeast of the injection site near a legacy oil exploratory well and is permitted as an industrial well. Five wells lie to the southwest. Three wells are about 3, 11, and 12 mi from the injection site and are permitted as domestic water supply. The last two wells are located on adjacent sections 11 mi from the injection site; one is permitted for stock, and the other’s purpose is unknown.

Multiple other freshwater-bearing units, primarily of Tertiary age, overlie the Fox Hills–Hell Creek aquifer system in the AOR (Figure 3-14). These formations are often used for domestic and agricultural purposes. The Cannonball and Tongue River Formations comprise the major aquifer units of the Fort Union Group, which overlies the Hell Creek Formation. The Cannonball Formation consists of interbedded sandstone, siltstone, claystone, and thin lignite beds of marine

origin. The Tongue River Formation is predominantly sandstone interbedded with siltstone, claystone, lignite, and occasional carbonaceous shales. The basal sandstone member of the Tongue River is persistent and a reliable source of groundwater in the region. The thickness of this basal sand ranges from approximately 200 to 500 ft and directly underlies surficial glacial deposits in the area of investigation. Tongue River groundwaters are generally a sodium bicarbonate type with a TDS of approximately 1,000 ppm (Croft, 1973).

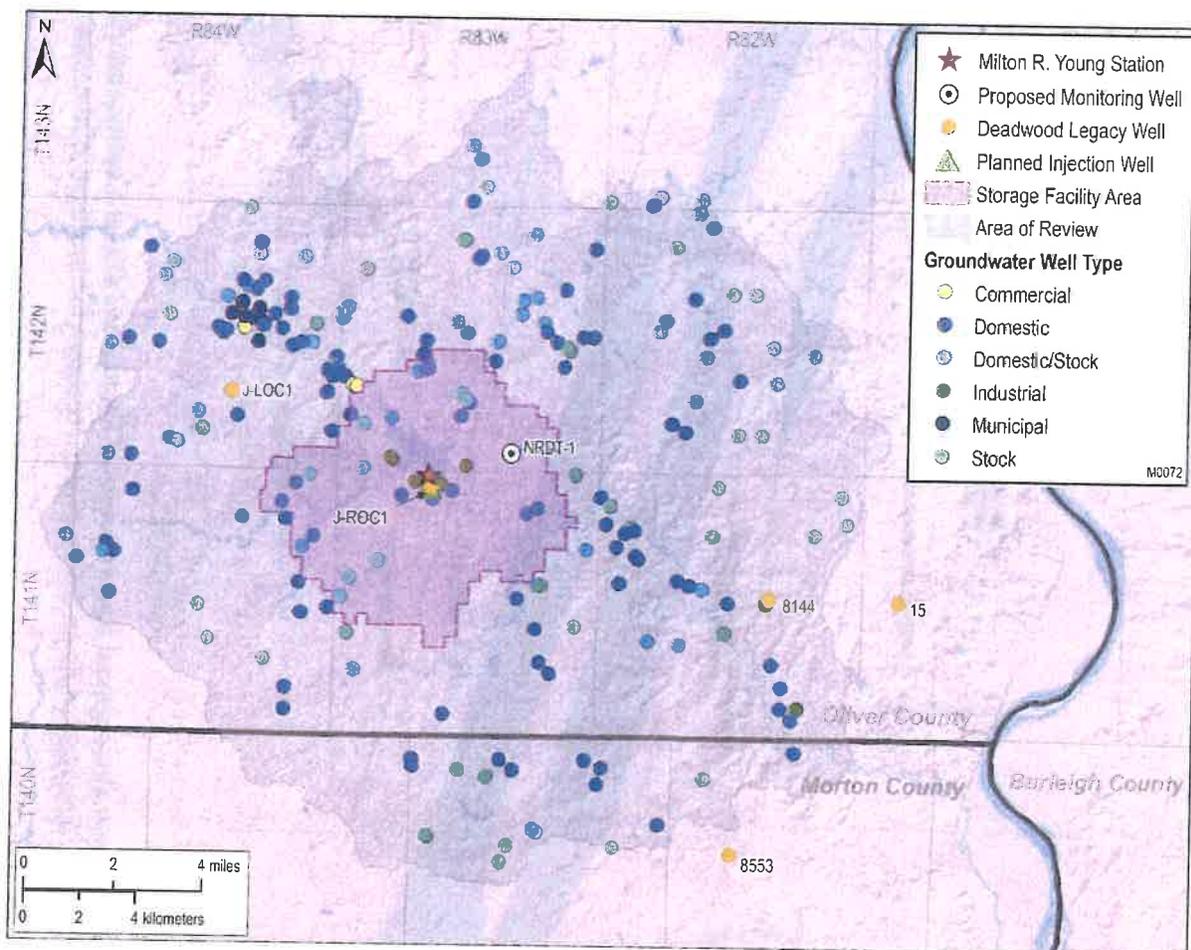


Figure 3-13. Map of water wells in the AOR in relation to the McCall-1 planned injection well, the NRDT-1 proposed monitoring well, storage facility area, AOR, and legacy oil and gas wells.

The Sentinel Butte Formation, a silty fine-to-medium-grained sandstone with claystone and lignite interbeds, overlies the Tongue River Formation in the extreme western portion of the AOR. The Sentinel Butte Formation is predominantly sandstone with lignite interbeds. While the Sentinel Butte Formation is another important source of groundwater in the region, primarily to the west of the AOR, the Sentinel Butte is not a source of groundwater within the AOR. TDS in the Sentinel Butte Formation range from approximately 400–1,000 ppm (Croft, 1973).

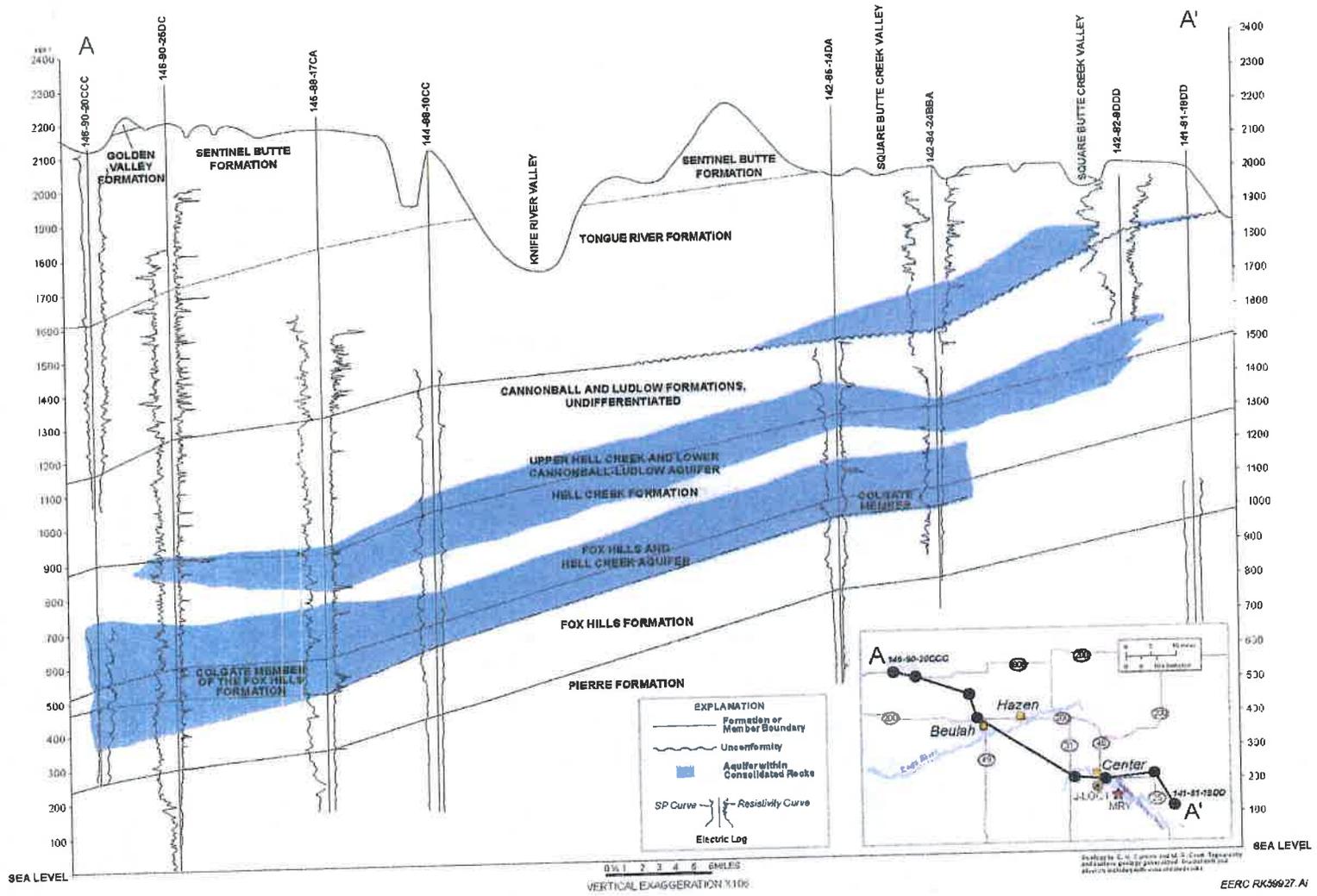


Figure 3-14. West–east cross section of the major regional aquifer layers in Mercer and Oliver Counties and their associated geologic relationships (modified from Croft, 1973). The black dots on the inset map represent the locations of the water wells illustrated on the cross section.

3.4.4 Protection for USDWs

The Fox Hills–Hell Creek aquifer system is the lowest USDW in the AOR. The injection zone (Deadwood Formation) and lowest USDW (Fox Hills–Hell Creek aquifer system) are isolated geologically and hydrologically by multiple impermeable rock layers consisting of shale and carbonate formations of Ordovician, Silurian, Devonian, Carboniferous, Permian, Jurassic, and Cretaceous ages (Figure 3-9). The primary seal of the injection zone is the Ordovician-aged Icebox Formation with shales of the Ordovician-aged Roughlock and Stoughton, Mississippian–Devonian-aged Bakken, Permian-aged Opeche, Jurassic-aged Piper (Picard), Rierdon, and Swift Formations, all of which overly the Icebox Formation. Above the Swift is the confined saltwater aquifer system of the Inyan Kara Formation, which extends across much of the Williston Basin. The Inyan Kara Formation will be monitored for temperature and pressure changes via fiber optic lines installed in the injection well, McCall-1 and the NRDT-1 monitoring well. Above the Inyan Kara Formation are the Cretaceous-aged shale formations, which are named the Skull Creek, Mowry, Belle Fourche, Greenhorn, Carlisle, Niobrara, and Pierre. The Pierre Formation is the thickest shale formation in the AOR and the primary geologic barrier between the USDWs and the injection zone. The geologic strata overlying the injection zone consist of multiple impermeable rock layers that are free of transmissive faults or fractures and provide adequate isolation of the USDWs from CO₂ injection activities in the AOR.

3.5 References

- Croft, M.G., 1973, Ground-water resources of Mercer and Oliver Counties, North Dakota: U.S. Geological Survey, County Ground Water Studies – 15.
- Fischer, K., 2013, Groundwater flow model inversion to assess water availability in the Fox Hills–Hell Creek Aquifer: North Dakota State Water Commission Water Resources Investigation No. 54.
- Thamke, J.N., LeCain, G.D., Ryter, D.W., Sando, R., and Long, A.J., 2014, Hydrogeologic framework of the uppermost principal aquifer systems in the Williston and Powder River structural basins, United States and Canada: U.S. Geological Survey Groundwater Resources Program Scientific Investigations Report 2014-5047.
- Trapp, H., and Croft, M.G., 1975, Geology and ground water resources of Hettinger and Stark Counties North Dakota: U.S. Geological Survey, County Ground Water Studies – 16.

4.0 SUPPORTING PERMIT PLANS

The ten supporting plans of this permit application are listed in Table 4-1 and provided in this section of the application. To aid in the review of these plans, it should be noted that four monitoring-related plans (i.e., corrosion monitoring and prevention plan, surface leak detection and monitoring plan, subsurface leak detection and monitoring plan, and testing and monitoring plan) are presented under the single subsection entitled Testing and Monitoring Plan. The other plans are presented in their respective subsections.

Table 4-1. Supporting Plans for Permit Application

Testing and Monitoring Plan
Corrosion Monitoring and Prevention Plan*
Surface Leak Detection and Monitoring Plan*
Subsurface Leak Detection and Monitoring Plan*
Emergency and Remedial Response Plan
Financial Assurance Demonstration Plan
Worker Safety Plan
Well Casing and Cementing Plan
Plugging Plan
Postinjection Site Care and Facility Closure Plan

* These plans are presented under the heading Testing and Monitoring Plan (Section 4.1).

The development of several of the plans identified in Table 4-1 was informed by a screening-level risk assessment (SLRA) of the geologic storage project, which was performed in accordance with the international standard, ISO 31000 (Ayash, Azzolina, and Nakles, technical memorandum, February 12, 2020). The SLRA was conducted through a series of work group sessions involving subject matter experts (SMEs) that were held from May 2018 through April 2019. The technical experts were asked to review 18 individual technical project risks and four nontechnical risks and assign them a probability of occurrence and assess their potential impacts on cost, schedule, health and safety, environment, permitting/compliance, and corporate image/public relations.

The technical risks were grouped into the following six risk categories: 1) injectivity (three risks), 2) storage capacity (two risks); 3) subsurface containment – lateral migration of carbon dioxide (CO₂) or formation water brine (one risk); 4) subsurface containment – propagation of subsurface pressure plume (two risks); 5) subsurface containment – vertical migration of CO₂ or formation water brine via injection wells, plugged and abandoned wells, monitoring wells, or faults/fractures (nine risks); and 6) induced seismicity (one risk). The risk assessment results indicated that there were currently no potential risks that would prevent the storage complexes evaluated in the feasibility study from serving as commercial-scale geologic CO₂ storage sites. While the results of the SLRA indicated that there are no risks that would preclude the commercial deployment of the project, it identified a set of operational events with the potential for endangering underground sources of drinking water (USDWs) for future monitoring and provided the basis for the identification and costing of potential emergency response actions during the geologic storage operations.

Using this SLRA as a starting point, a team consisting of representatives of Oxy Permian Risk, Low Carbon Ventures (LCV) engineers, Minnkota personnel, Energy & Environmental Research Center (EERC) staff, and BNI Energy engineers met to conduct further risk assessment of Tundra SGS proposed design and operations. The purpose of this review was to identify potential hazards based on facility design and operation.

The risk assessment process used for Project Tundra was developed specifically for this project based on consultation and agreement of risk team members. The agreed-upon approach used a combination of evaluating impact and probability level for a variety of impact categories to determine the overall risk level. These steps are performed for each of the identified risk scenarios developed as discussed in more detail below.

A total of 38 scenarios associated with the facility operation were evaluated. Thirteen (13) scenarios were identified to have a Risk Level 4 or higher which may be equivalent to a medium level risk, the yellow range identified on the risk matrix (Section 6. Risk Matrix). However, the team did not define high, medium, or low risk based on risk score. Further discussion of costing and actions related to the monitoring approaches identified in this section are included in the financial assurance demonstration plan (FADP).

4.1 Testing and Monitoring Plan

An extensive monitoring, verification, and accounting (MVA) system will be implemented to verify that the Tundra SGS project is operating as permitted and is not endangering USDWs. The objectives of the MVA program are to proactively account for and verify the location of CO₂ injected. This MVA plan includes an analysis of the injected CO₂, periodic testing of the injection well, a corrosion-monitoring plan for the CO₂ injection well components, a leak detection and monitoring plan for surface components of the CO₂ injection system, and a leak detection plan to monitor any movement of the CO₂ outside of the storage reservoir. As such, this plan simultaneously meets the permit requirements for three other required plans: 1) corrosion-monitoring and prevention plan, 2) surface leak detection and monitoring plan, and 3) subsurface leak detection and monitoring plan.

The combination of the above monitoring efforts is used to verify that the geologic storage project is operating as permitted and protecting the USDWs. An overview of these individual monitoring efforts is provided in Table 4-2 along with the structure/project area that is being monitored.

Pursuant to North Dakota Administrative Code (NDAC) § 43-05-01-11.4 subsection 1j, “Periodic reviews of the testing and monitoring plan by the storage operator to incorporate monitoring data collected, operational data collected, and the most recent area of review reevaluation performed. The storage operator shall review the testing and monitoring plan at least once every five years.”

Table 4-2. Overview of Tundra SGS Monitoring Program for the Geologic Storage of CO₂

Monitoring Type	Tundra SGS Monitoring Program	Target Structure/ Project Area
Analysis of Injected CO ₂	Compositional and isotopic analysis of the injected CO ₂ stream	Upstream or downstream of the flowmeter
CO ₂ Flowline	Distributed temperature sensing (DTS)/distributed acoustic sensing (DAS) and distributed strain sensing (DSS)	Capture facility to the wellsite
Continuous Recording of Injection Pressure, Rate, and Volume	Surface pressure/temperature gauges and a flowmeter installed at the wellhead with shutoff alarms	Surface-to-reservoir (injection well)
Well Annulus Pressure Between Tubing and Casing	Annular pressure gauge for continuous monitoring	Surface-to-reservoir (injection well)
Near-Surface Monitoring	Groundwater wells in the area of review (AOR), dedicated Fox Hills monitoring well, and soil gas sampling and analyses	Near-surface environment, USDWs
Direct Reservoir Monitoring	Wireline logging, tubing-conveyed downhole pressure and temperature gauges, and casing-conveyed DTS (fiber optic)	Storage reservoir and primary sealing formation
Indirect Reservoir Monitoring	Time-lapse geophysical (seismic) surveys, inSAR ¹ and passive seismic measurements	Entire storage complex
Internal and External Mechanical Integrity	Tubing-casing annulus pressure testing (internal), casing integrity tools (i.e., USIT ²) (external)	Well infrastructure
Corrosion Monitoring	Flow-through corrosion coupon test system for periodic corrosion monitoring	Well infrastructure

¹ Interferometric synthetic aperture radar.

² Ultrasonic imager tool.

If needed, amendments to the testing and monitoring plan (i.e., technologies applied, frequency of testing, etc.) will be submitted for approval by the North Dakota Industrial Commission (NDIC). The results of pertinent analyses and data evaluations conducted as part of the monitoring program will be compiled and reported, as required. Another goal of this monitoring program is to establish preinjection baseline data for the storage complex, including baseline data for nearby groundwater wells, the Fox Hills Formation (deepest USDW), and soil gas.

Additional details of the individual efforts of the monitoring program are provided in the remainder of this section.

4.1.1 Analysis of Injected CO₂ and Injection Well Testing

4.1.1.1 CO₂ Analysis

Prior to injection, Minnkota Power Cooperative, Inc. (Minnkota) will determine the chemical and physical characteristics of the CO₂ that has been captured for storage using appropriate analytical methods. The anticipated chemical composition is shown in Table 4-3.

Table 4-3. Proposed Composition of the Injection Stream (Minnkota)

Chemical Component	ppmv	mol%
CO ₂	804,195	0.999
H ₂ O	632	7.85E-04
N ₂	163	2.02E-04
O ₂	6	7.45E-06
H ₂	0	0.00E+00
Ar	4	4.97E-06

4.1.1.2 Injection Well Integrity Tests

Until the CO₂ injection well is plugged, Minnkota will monitor its external mechanical integrity with casing integrity tools. These casing integrity tools, either an USIT or electromagnetic (EM) log will be run on the injection well to establish the initial baseline external mechanical integrity. A casing integrity tool will be run annually at a minimum from 7800 ft TD (i.e., inclusive of the Deadwood injection interval) in the McCall-1 to verify the external mechanical integrity of the injection well. Internal mechanical integrity of the injection well will be demonstrated via a tubing-casing annulus pressure test prior to injection at least once every 5 years thereafter. In addition, a pressure fall-off test will be performed in the injection well prior to initiation of CO₂ injection activities, and at least once every 5 years thereafter, to demonstrate storage reservoir injectivity.

4.1.2 Corrosion Monitoring and Prevention Plan

The corrosion management program (CMP) includes identification of active and potential future damage mechanisms and their mitigation, control, and monitoring. The CMP is a major component of the mechanical integrity program and monitoring, reporting, and verification (MRV) plan.

For the purpose of the CMP document, the CCS (carbon capture and storage) hub was divided into the following systems:

- **CO₂ capture facility:** not included in the scope of this permit application.
- **CO₂ transportation flowline:** from the fence line of the CO₂-metering facility to the outlet at the well pad borders.
- **Surface piping, instrumentation, and pressure control equipment at the injection wellsite:** from the outlet of the main CO₂ flowline until the connection with the injection tree/wellhead.
- **Downhole equipment:** from the injection tree/wellhead to the reservoir. There are two categories for downhole equipment based on the service conditions: injector wells and in-zone monitoring wells.

4.1.2.1 Corrosion Threat Assessment

The corrosion threat assessment identifies which damage mechanism is currently active and likely to occur in systems or equipment along with the potential consequences of the damage.

4.1.2.2 Identification of Critical Components and Operating Conditions

This section identifies the different components included in the corrosion and monitoring plan as well as the fluid compositions, fluid state, operating pressures, temperatures, and flow rates to which the equipment will be exposed:

- For each system, the critical component or equipment is identified in Appendix F.
- A detailed description of the selected material and operating condition is specified by each component or equipment.
- Table 4-4 shows the CO₂ specifications for the Tundra SGS project.

Table 4-4. CO₂ Specifications for Tundra SGS Project

Stream Description	Compressed CO ₂ Product to Battery
Stream Number	606
Temperature, °F	120
Pressure, psia	1,688.7
Components	
Component Flows	Limits
H ₂ O	632 ppmv
CO ₂	99.90%
N ₂	163 ppmv
Ar	4 ppmv
O ₂	6 ppmv
H ₂	0%
SO ₂	<1 ppmv
NO ₂	<1 ppmv
NO	30 ppmv

4.1.2.3 Damage Mechanism

This section defines the corrosion mechanisms currently active and likely to occur, along with the potential consequences of the damage.

Damage mechanisms are classified in the following four categories:

- **Internal corrosion:** results in loss of wall thickness of the equipment and piping due to the action of the contained fluid on the material of construction. The damage may be general or localized.

- **External corrosion:** results in loss of wall thickness of the equipment and piping due to the action of the environment on the materials of construction. The damage may be general or localized.
- **Environmental-assisted cracking:** caused by a specific combination of the environment, material of construction, and applied or residual stress. Cracking may originate from the inside (process side) or outside (environment side).
- **Mechanical and metallurgic damage:** results from the interaction of the material and process or external environment, such as brittle fracture, creep, erosion, and metal fatigue.

Appendix F summarizes the damage mechanism associated with each component or element during the analysis.

4.1.2.4 *Corrosion Control Program (CCP)*

For each component identified in the corrosion threat assessment and damage mechanism association, a set of mitigations, corrosion-monitoring techniques, inspections, data gathering, and analysis will be implemented. The CCP includes the following:

- Description of the system and damage mechanism
- Mitigations, if any
- Monitoring description
- Monitoring frequency
- Target limits for monitoring
- Person responsible for the analysis of the monitoring data
- Consequence of operation outside of target limits
- Remedial action outside of target limits
- Required period for remedial action

Appendix F includes the CCP matrix.

4.1.2.5 *Annual Review*

The operator shall prepare an annual CMP report, confirming the status of the actions and controls described in the CMP, highlighting any findings during inspections, and identifying the failure and root cause analysis. The CMP shall be reviewed more frequently if there are changes in the conditions that could lead to:

- An increase in severity of the active corrosion mechanism.
- A significant likelihood of any inactive corrosion mechanism being activated.

4.1.2.6 *Data Management*

The results of the corrosion threat assessment and CCP shall be recorded and available for review, according to the operator data management standard and systems.

4.1.3 Surface Leak Detection and Monitoring Plan

Surface components of the injection system, including the CO₂ transport flowline and wellhead, will be monitored using CO₂ leak detection equipment. The flowline from the capture facility to the wellhead will be monitored using a DTS/DAS and DSS fiber optic cable with an interrogator system to provide the ability to detect leaks along the flowline. The CO₂ detectors will be placed at the injection wellhead and key wellsite locations (e.g., flowline riser). Leak detection equipment will be integrated with automated warning systems, which will be inspected and tested on a semiannual basis. Any defective equipment will be repaired or replaced within 10 days and retested, if necessary. A record of each inspection result will be kept by the site operator, maintained for at least 10 years, and available to NDIC upon request. Any detected leaks at the surface facilities shall be promptly reported to NDIC.

4.1.4 Subsurface Leak Detection and Monitoring Plan

The monitoring plan for detecting subsurface leaks comprises the surface-, near-surface-, and deep subsurface-monitoring programs. Surface/near-surface refers to the region from ground surface down to, and including, the deepest USDW as well as surface waters, soil gas (vadose zone), and shallow groundwater (e.g., residential drinking water wells, stock wells, etc.). The deep subsurface zone extends from the base of the deepest USDW to the bottom of the injection zone of the storage reservoir.

Subsurface leak detection will require multiple approaches to ensure confidence that surface (i.e., ambient and workspace atmospheres and surface waters) and near-surface (i.e., vadose zone, groundwater wells, and deepest USDWs) environments are protected and that the CO₂ is safely and permanently stored in the storage reservoir. More specifically, for the Tundra SGS project, near-surface monitoring will include installation of one dedicated Fox Hills Formation monitoring well to detect if the deepest USDW is being impacted by operations as well as two soil gas profile stations, each located at the CO₂ injection (i.e., McCall-1 and NRDT-1) deep monitoring wellsites. In addition, existing groundwater wells within the AOR have been identified, and a set of domestic wells will be periodically sampled as outlined in the monitoring program. These monitoring efforts will provide additional lines of evidence to ensure the surface/near-surface environment is being protected and injected CO₂ is being safely and permanently stored in the storage reservoir.

Operational monitoring at the injection well (McCall-1), including injection rates, pressures, and temperatures, will provide data to inform the monitoring approaches. Internal and external mechanical integrity of the injection well will also be demonstrated to ensure no leakage pathway exists that may allow vertical movement of the CO₂. Additionally, geophysical (seismic) surveys conducted over regular intervals will monitor subsurface CO₂ plume movement.

More details regarding the surface-, near-surface-, and deep subsurface-monitoring efforts are provided in the remainder of this section.

4.1.5 Near-Surface Groundwater and Soil Gas Sampling and Monitoring

Surface and near-surface environments will be monitored within the delineated AOR via groundwater wells (e.g., domestic drinking water wells, stock wells, etc.) and vadose zone soil gas-sampling prior to CO₂ injection (preoperational baseline), during active CO₂ injection (operational), and in the postoperational-monitoring time frame.

Using data from ongoing mine reclamation and power plant monitoring programs, Minnkota has achieved near-surface baseline sampling of the Tongue River aquifer near the injection site. The North Dakota State Water Commission (NDSWC) database was used to identify candidate wells within the AOR to complete an initial near-surface baseline sampling program, including seasonal sampling of existing groundwater wells (Figure 4-1). This baseline sampling program and results to date are described in detail in Section 4.1.6.

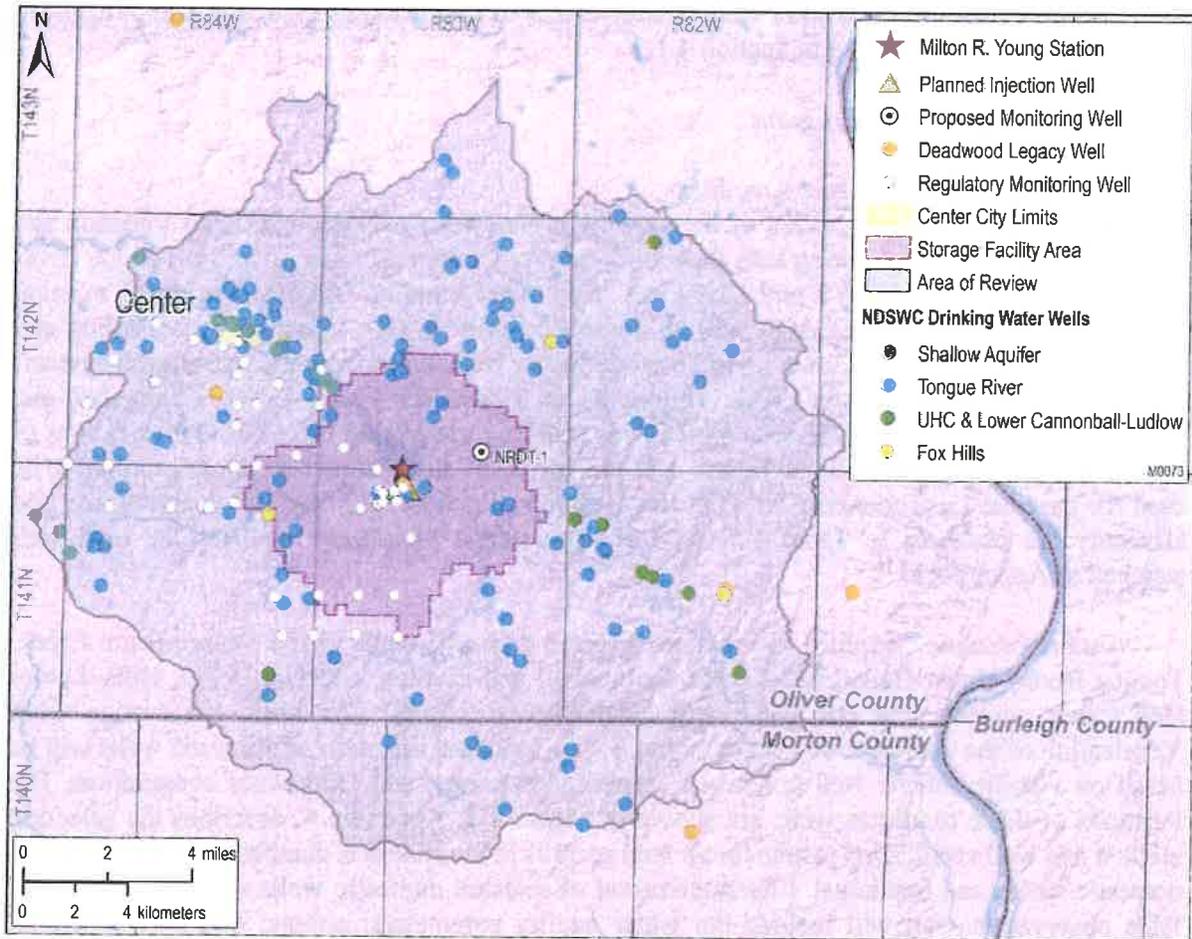


Figure 4-1. Minnkota will carry out initial sampling program for near-surface groundwater wells. Shown are existing regulatory monitoring wells to be used for baseline; all wells listed for drinking water in the NDSWC database by aquifer; the location of all plugged and abandoned (P&A) legacy oil and gas exploratory wells; city of Center, North Dakota; Milton R. Young Station (MRYS); and McCall-1 (proposed injector) and NRDT-1 (proposed monitoring well) in relation to the storage facility area and the AOR. The well drilled for baseline characterization and monitoring of the Fox Hills Formation will be located at the injection wellsite.

Prior to injection operations, one dedicated Fox Hills Formation monitoring well will be installed at the McCall-1 CO₂ injection wellsite. The Fox Hills Formation will be sampled seasonally, and baseline state-certified laboratory analyses will be provided to NDIC prior to injection. In addition, two soil gas profile stations will be installed: one near the McCall-1 injection wellsite and another near the deep monitoring wellsite (NRDT-1). Baseline soil gas analyses will be provided to NDIC prior to CO₂ injection operations.

The near-surface monitoring plan will focus on the dedicated Fox Hills Formation well, a subset of the existing groundwater wells characterized to establish baseline, and soil gas profile stations. The plan is described in Section 4.1.7.

4.1.6 Baseline Sampling Program

4.1.6.1 Groundwater Baseline Sampling

An initial baseline characterization of the shallow groundwater near the McCall-1 injection site has been completed by acquiring data from long-term regulatory monitoring in the Tongue River aquifer by Minnkota's MRYS and BNI Coal. Additional baseline characterization of existing groundwater wells within the AOR will be completed prior to CO₂ injection by collecting and characterizing seasonal samples of up to 16 groundwater wells taken from the five aquifer systems (i.e., Square Butte Creek, Otter Creek, Tongue River, Upper Hell Creek–Lower Cannonball and Ludlow, and Upper Fox Hills–Lower Hell Creek aquifers) underlying the AOR. The locations of these candidate wells are shown in Figure 4-2. The results of the existing regulatory program to be used for baseline measurements for TDS (total dissolved solids), pH, specific conductivity, and alkalinity are provided in Table 4-5, with comprehensive laboratory analyses for each well attached in Appendix C.

Future baseline sampling will include selected domestic wells in the Square Butte Creek, Tongue River, Upper Hell Creek–Lower Cannonball and Ludlow, and Upper Fox Hills–Lower Hell Creek aquifers and one U.S. Geological Survey (USGS) Fox Hills observation well. Verification of the domestic well status is under way, and final selection of domestic wells will be based on viability of the well (existence, depth, access, etc.) and landowner cooperation. The locations of these candidate wells are shown in Figure 4-2. Appendix C describes the selection method and well verification results for all well permits in the NDSWC database labeled domestic, domestic/stock, and municipal. Characterization of selected domestic wells and one USGS Fox Hills observation well will include the water quality parameters; anions; dissolved and total carbon, major cations, and trace metals; and isotope analysis to establish the natural partitioning of the groundwater constituents listed in Appendix C.

The results from these sampling efforts will provide a preoperational baseline of the groundwater quality in the four USDWs within the AOR of the CO₂ geologic storage project. The results will be submitted to NDIC before CO₂ injection occurs.

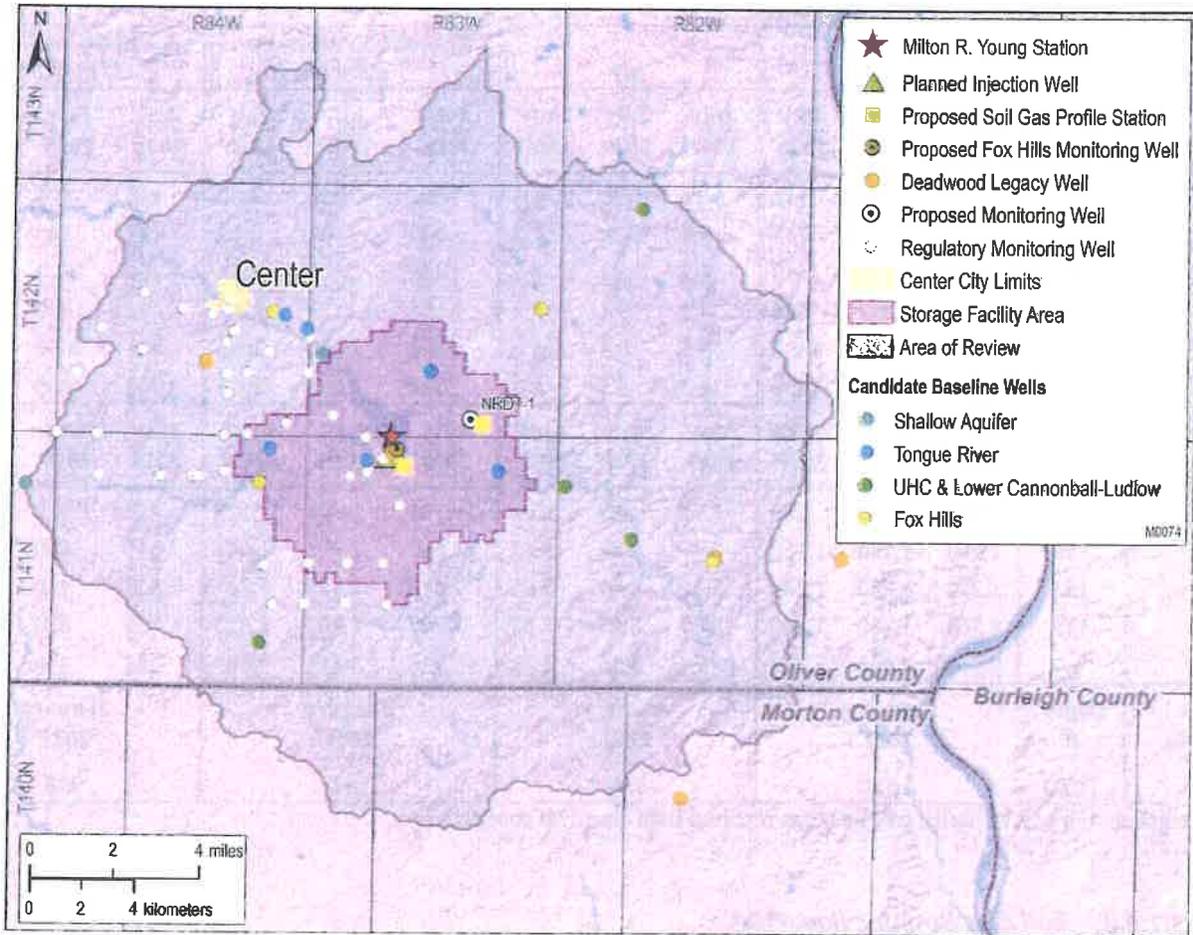


Figure 4-2. Tundra SGS project groundwater well sampling program to establish a groundwater baseline, including seasonal fluctuation, within the AOR. Shown are locations for existing regulatory monitoring well data and candidate options for additional baseline sampling by aquifer.

Table 4-5. Baseline Groundwater-Data

Parameter		TDS, mg/L*			pH			Specific Conductance, mS/cm			Alkalinity as CaCO ₃ , mg/L		
BNI Well No.	Depth, ft	July 2018	July 2019	July 2020	July 2018	July 2019	July 2020	July 2018	July 2019	July 2020	July 2018	July 2019	July 2020
322A	21	525	726	532	6.19	6.6	6.6	801	980	832	118	124	165
324	88	360	817	745	7.8	7.8	7.8	649	1193	1182	188	345	369
363	82	1440	1500	1550	8.3	8.3	8.2	2446	2460	2454	1090	1110	1200
C1-1	129	706	699	698	8.4	8.4	8.4	1151	1123	1168	454	480	526
C7-1	184	1410	1480	1490	8.5	8.4	8.2	2105	2098	2096	985	1050	1120
C9-1	163	1520	1610	1430	8.2	8.3	8.3	2029	2032	2012	968	1030	1080
MRYS Well No.	Depth, ft	May 2019	Sept. 2019	April 2020	May 2019	Sept. 2019	April 2020	May 2019	Sept. 2019	April 2020	May 2019	Sept. 2019	April 2020
92-5A	185	800	790	780	8.75	8.9	8.94	1,131	1,184	1,129	488	520	499
92-6A	150	1,180	1,180	1,150	8.43	8.87	8.67	1,697	1,744	1,642	641	690	632
92-3	155	1,270	1,280	1,280	8.32	8.65	8.66	1,812	1,887	1,841	823	910	837
95-4	145	1,260	1,260	1,260	8.31	8.55	8.53	1,797	1,862	1,815	829	880	836
97-1	67	2,740	2,900	2,410	6.3	6.26	6.33	3,736	3,485	3,597	284	310	327
USGS Well No.	Depth, ft	January 2021			January 2021			January 2021			January 2021		
10	1,290	1,520			8.42			2,641			938		

* Calculation. For MRYS wells, calculated on reported field electrical conductivity.

4.1.6.2 Soil Gas Baseline Sampling

Soil gas sampling and analyses will be performed in order to establish baseline soil gas concentrations near the injection and deep monitoring wellsites in the AOR. Effective soil gas monitoring in reclaimed mine lands requires installation of soil gas profile stations, which will be located off of the well pads near the McCall-1 CO₂ injection and deep monitoring (NRDT-1) wellsites, as shown in Figure 4-3. The analyses, which determine the concentration of CO₂, O₂, and N₂, will be performed in accordance with ASTM International (ASTM) standard procedures (D5314) for soil gas sampling and analysis (ASTM International, 2006). In addition, isotopic analysis of the baseline soil gas samples will establish the natural source partitioning of the gases.

The sampling results from these efforts will provide a preoperational baseline of the soil gas chemistry of the vadose zone in the AOR of the CO₂ geologic storage project. Results will be submitted to NDIC.

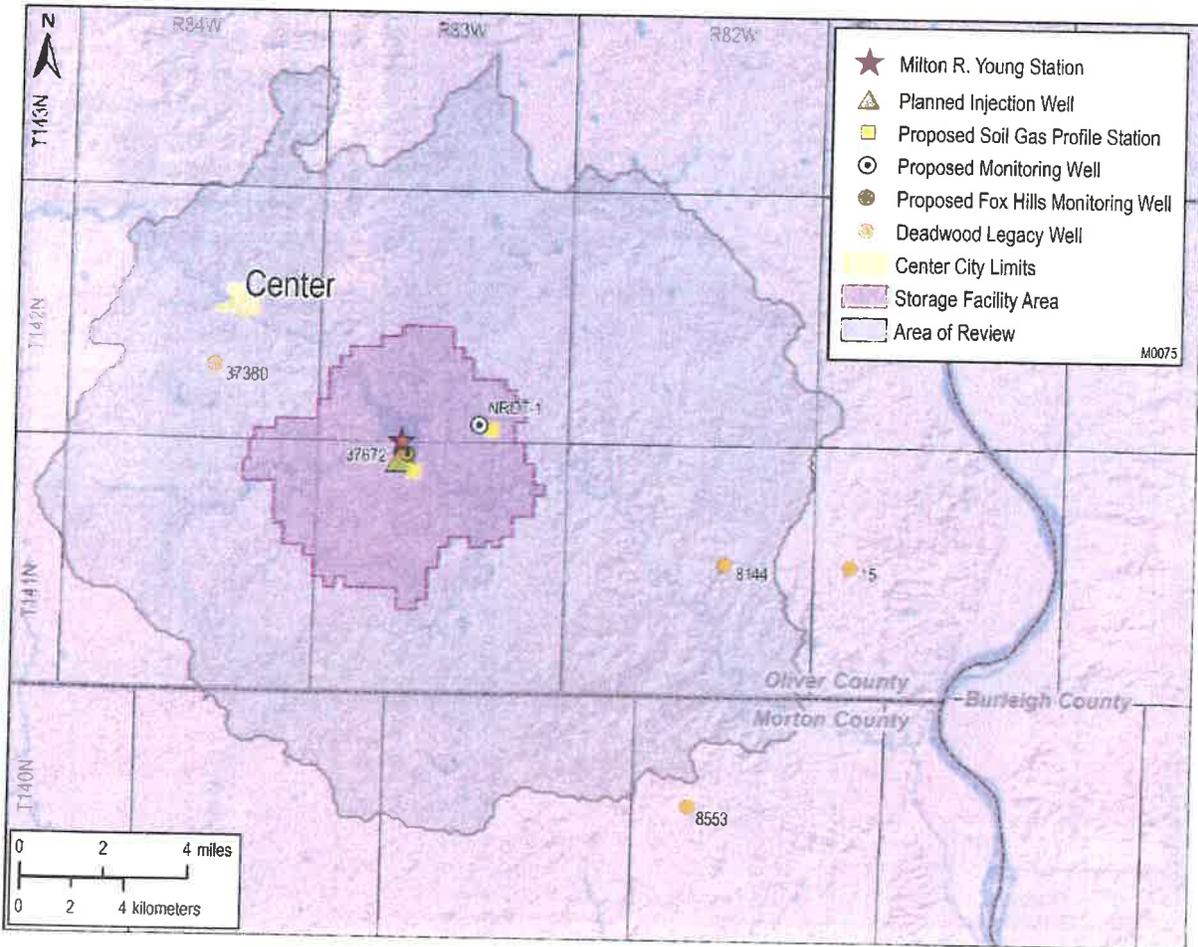


Figure 4-3. Minnkota will install soil gas profile stations and complete an initial soil gas-sampling program to establish baseline soil gas concentrations, including seasonal fluctuation. The sample locations are near the CO₂ injection McCall-1 and deep monitoring NRDT-1 wellsites of the Tundra SGS project site.

4.1.7 Near-Surface (Groundwater and Soil Gas) Monitoring Plan

Prior to injection operations, Minnkota will drill and construct a dedicated groundwater-monitoring well in the Fox Hills Formation (i.e., deepest USDW) at the McCall-1 (proposed) CO₂ injection wellsite (Figure 4-4). Baseline Fox Hills Formation water samples will be collected from this monitoring well over a 1-year period prior to CO₂ injection, with the goal of securing these samples during each of the four seasons (spring, summer, fall, and winter). Minnkota plans to monitor the vadose zone by installing two soil gas profile stations, each one near the wellsites of the McCall-1 (proposed) CO₂ injection and NRDT-1 deep monitoring well pads (Figure 4-4). Minnkota will select a subset of existing groundwater wells, as outlined above, within the AOR boundary for periodic monitoring during CO₂ injection operations and postinjection monitoring (see Figure 4-4).

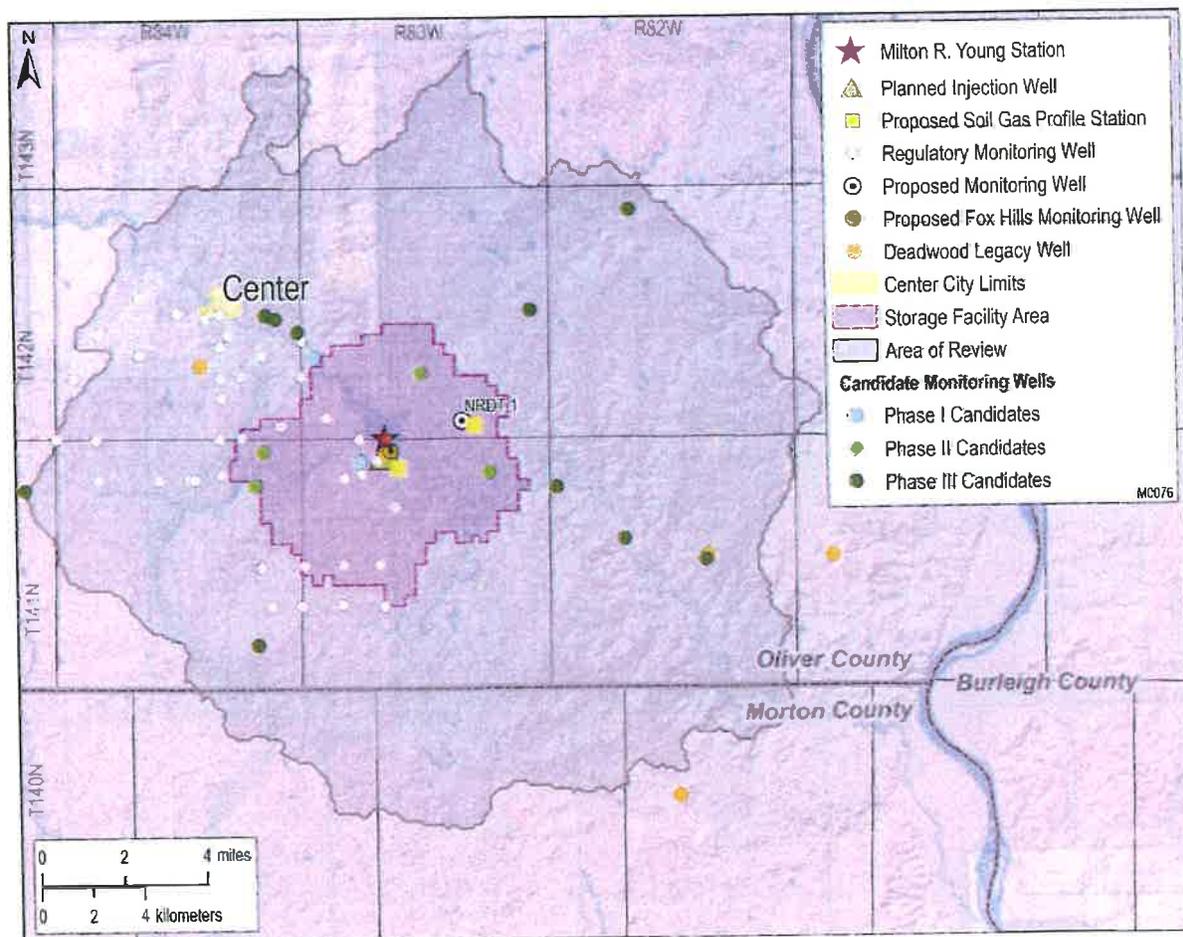


Figure 4-4. Tundra SGS project near-surface monitoring plan sample locations showing the Fox Hills Formation (deepest USDW) monitoring well, candidate groundwater wells to be sampled, and the two soil gas profile stations in and around the Tundra SGS project site.

During the first 3 years of CO₂ injection activities, the Fox Hills Formation monitoring well, soil gas profile stations (near the McCall-1 CO₂ injection and NRDT-1 deep monitoring wellsites), and select groundwater wells within the AOR will be sampled on an annual basis. All laboratory results will be filed with NDIC. If the results show no significant changes to water chemistry, the well-sampling frequency will be reduced to one sample every 5 years starting at Year 5 of the injection operations for all previously monitored wells.

As the areal extent of the CO₂ plume increases, monitoring of additional groundwater wells within the AOR will be phased in over time based on monitoring of the CO₂ plume in the injection zone. Each additional well will be sampled annually for 3 years. If the results show no significant changes to the water chemistry, the sampling frequency will be reduced to one sample at a 2-year interval and then at 5-year intervals thereafter. A detailed near-surface monitoring plan is presented in Table 4-6, including the frequency and duration of the sampling during each phase (i.e., preinjection, operational, and postoperational) of the geologic CO₂ storage project.

Table 4-6. Baseline (preinjection), Operational, and Postoperational Monitoring Frequency and Duration for Soil Gas, Groundwater, and Surface Air

Monitoring Type	Baseline (preinjection)*	Operational	Postoperational
Soil Monitoring			
Soil Gas Profile Stations	Duration: minimum 1 year	Duration: 20 years	Duration: minimum 10 years
Soil Gas Probes	Frequency: Sample 3–4 events per well to establish natural seasonal baseline. Soil gas profile stations at each location (near the McCall-1 CO ₂ injection and NRDT-1 deep monitoring wellsites) will be sampled prior to initiation of CO ₂ injection operations.	Frequency: 3–4 sample events per year at soil gas profile station locations (near the McCall-1 CO ₂ injection and NRDT-1 deep monitoring wellsites) to account for natural seasonal fluctuation. Additional soil gas probe sampling may be conducted every 5 years based on monitoring and the expansion of the subsurface CO ₂ plume in the injection zone.	Frequency: 3–4 seasonal sample events at soil gas profile station locations (near the McCall-1 CO ₂ injection and NRDT-1 deep monitoring wellsites) performed every 3 years following cessation of CO ₂ injection.
Water Monitoring			
Groundwater (existing freshwater wells, e.g., domestic water wells, municipal wells, etc.)	Duration: minimum 1 year Frequency: minimum of one sample per year of select groundwater wells within the AOR. Groundwater wells are selected based on location, type, depth, aquifer, etc., to ensure a baseline of each groundwater horizon has been established prior to CO ₂ injection.	Duration: 20 years Frequency: Sampling of select groundwater wells within the AOR will occur at a minimum of once per year during Years 1–3. Assuming the data are consistent during the first 3 years, monitoring frequency will decrease to one at a 2-year interval and then repeated at 5-year intervals thereafter. Additional monitoring wells will be phased in over time based on expansion of the subsurface CO ₂ plume in the injection zone. Sampling frequency for added wells will follow the same structure as the original wells.	Duration: minimum 10 years Frequency: 3–4 sample events at cessation of injection and 3–4 sample events as part of the final site closure assessment.

Continued . . .

Table 4-6. Baseline (preinjection), Operational, and Postoperational Monitoring Frequency and Duration for Soil Gas, Groundwater, and Surface Air (continued)

Monitoring Type	Baseline (preinjection)*	Operational	Postoperational
Fox Hills Formation (deepest USDW)	Duration: minimum of 1 year Frequency: 3–4 sample events per well (establish seasonal fluctuation baseline). One Fox Hills Formation monitoring well (to be installed) located at the CO ₂ injection wellsite (McCall-1).	Duration: 20 years Frequency: Sampling of Fox Hills monitoring well will occur at a minimum of once per year during Years 1–3. Assuming the data are consistent during the first 3 years, monitoring frequency will decrease to one at a 2-year interval and then repeated at 5-year intervals thereafter.	Duration: minimum 10 years Frequency: 3–4 sample events at cessation of injection and 3–4 sample events as part of the final site closure assessment.

* The preinjection baseline monitoring effort is under way as of the writing of this permit application. As noted in the text, selected additional samples will be collected between the submission date of this permit application and the start of CO₂ injection.

4.1.8 Deep Subsurface Monitoring of Free-Phase CO₂ Plume and Pressure Front

Minnkota will implement direct and indirect methods to monitor the location, thickness, and distribution of the free-phase CO₂ plume (plume) and associated pressure front (pressure) relative to the permitted storage reservoir. The time frame of these monitoring efforts will encompass the entire life cycle of the injection site, which includes the preoperational (baseline), operational, and postoperational periods. The methods described in Tables 4-7 and 4-8 will be used to characterize the plume and pressure within the AOR. Minnkota’s testing and monitoring plan will include periodic reviews in which the monitoring data and operational data will be analyzed, AOR will be reevaluated and, if warranted, the testing and monitoring plan will be adapted to meet NDIC monitoring requirements.

The testing and monitoring plan will be reviewed in this manner at least once every 5 years. Based on this review, it will either be demonstrated that no amendment to the testing and monitoring plan is needed or modifications to the program are necessary to ensure proper monitoring of the storage performance is achieved and risk profile of the storage operations is addressed moving forward. This determination will be submitted to NDIC for approval. Should amendments to the testing and monitoring plan be necessary, these revisions will be incorporated into the permit following approval by NDIC. During the operational period, monitoring methods and data collection may be supplemented or replaced as advanced techniques are developed.

Early monitoring and operational data will be used to evaluate conformance between observations and history-matched simulation of the CO₂ and pressure distribution relative to the permitted geologic storage facility. The early monitoring and operational data will be used for additional calibration of the geologic model and associated simulations. These calibrated simulations and model interpretations will be used to demonstrate lateral and vertical containment of the injected CO₂ within the permitted geologic storage facility.

Table 4-7. Description of Tundra SGS Monitoring Program

Monitoring Type	Preoperational (baseline)	Operational	Postoperational
Storage Reservoir Monitoring			
Injection Well Monitoring (McCall-1) During Operations: <ul style="list-style-type: none"> • Flow Rates • Volumes • Surface Injection Pressure • Surface Injectate Temperature • Annulus Pressure Between Tubing and Long-String 	Frequency: initial setup The maximum allowable injection pressure and annulus pressure will be derived from preoperational injection tests.	Duration: 20 years Frequency: continuous monitoring	Plug and Abandon (P&A) injection well at cessation of injection operations Continue to monitor annulus pressure in NRDT-1 well
<ul style="list-style-type: none"> • Packer Fluid (corrosion inhibitor) Volume 	Initial volume of packer fluid to fill casing.	Record if additional volume to fill annulus. Test corrosion inhibitors effectiveness (as needed during well workovers).	P&A injection well at cessation of injection operations. Monitor fluid levels until well is plugged.
Downhole Pressure and Temperature Monitoring			
Tubing-Conveyed Pressure and Temperature Gauges in McCall-1 and NRDT-1	Gauges provide baseline temperature and pressure of the injection zone (Deadwood).	Gauges provide continuous temperature and pressure monitoring of the injection zone (Deadwood).	Gauges provide continuous temperature and pressure monitoring of the injection zone (Deadwood) until plume stabilization. Monitoring will continue in the NRDT-1 well as part of postinjection site care and facility closure plan.
Wireline Logging and Retrieval Monitoring			
Pulsed-Neutron Log (PNL) (McCall-1 and NRDT-1)	Baseline PNL logging	PNL logging to ensure fluids are contained within storage interval and ground-truth 3D seismic monitors once every 5 years (in conjunction with timing of seismic monitor).	Log McCall-1 at cessation and before P&A and NRDT-1 well at cessation of injection and once every 5 years thereafter until plume stabilization (in conjunction with timing of seismic monitor).
External Mechanical Integrity: Casing Integrity Tools (i.e., USIT or EM Casing Inspection Tool) (McCall-1 and NRDT-1)	Baseline casing inspection logging prior to injection.	Duration: 20 years Frequency: McCall-1 annual logging (minimum 7800 ft TD) across Deadwood injection interval. NRDT-1 5-year logging interval (during well workovers, if possible).	Duration: minimum 10 years postinjection Frequency: Perform during well workovers but not more frequently than once every 5 years in NRDT-1 well and N/A P&A McCall-1.

Continued . . .

Table 4-7. Description of Tundra SGS Monitoring Program (continued)

Monitoring Type	Baseline (preoperational)	Operational	Postoperational
Internal Mechanical Integrity: <ul style="list-style-type: none"> • Tubing-Casing Annulus Pressure Test 	Mechanical integrity test – internal pressure testing. McCall-1 (proposed) and NRDT-1 (proposed)	Perform during well workovers but not more frequently than once every 5 years in McCall-1 (proposed) and NRDT-1 (proposed)	Duration: minimum 10 years postinjection Frequency: perform during well workovers but not more frequently than once every 5 years in NRDT-1 (proposed) well
External Mechanical Integrity: <ul style="list-style-type: none"> • Downhole Temperature 	DTS AND Baseline temperature logging through the storage interval to surface McCall-1 (proposed) and NRDT-1 (proposed)	Continuous DTS OR, if fiber fails, annual temperature logging through the storage interval to surface NRDT-1 (proposed). Continuous DTS (surface – 7800 ft) OR, if fiber fails, annual temperature logging through the storage interval (7800 ft TD) McCall-1 (proposed).	Annual temperature logging in NRDT-1 (if fiber fails) until plume stabilization.
Pressure Fall-Off Test (injection zone)	Prior to injection at McCall-1 (proposed)	Every 5 years at McCall-1 (proposed)	Prior to P&A
Corrosion Monitoring	Baseline material specifications	Quarterly sampling for loss of mass, thickness, cracking, pitting, and other signs of corrosion. Corrosion coupons placed in contact with the CO ₂ stream.	N/A
Geophysical Monitoring			
Time-Lapse Seismic	Existing baseline 2D and 3D seismic and integrated in reservoir model for site characterization. Existing 2D and 3D seismic covers the predicted extent of the CO ₂ plume in the early monitoring of the site.	2D and/or 3D seismic monitor will be collected within first 5 years of injection sufficient to determine distribution of injected free-phase CO ₂ plume relative to permitted area and every 5 years thereafter. If plumes exceed baseline data extents, additional baseline data will be acquired or 2D or 3D AVO (amplitude variation with offset) data can be used to monitor plume extents.	2D and/or 3D time-lapse seismic and/or AVO method will continue every 5 years as part of minimum 10-year post-CO ₂ injection operations monitoring plan and until stability of plume is demonstrated.

Continued . . .

Table 4-7. Description of Tundra SGS Monitoring Program (continued)

Monitoring Type	Baseline (preoperational)	Operational	Postoperational
InSAR	Feasibility of surface deformation monitoring with InSAR – baseline data	To be determined. Continuous monitoring of ground elevation based on relative surface deformation with InSAR	To be determined. Continuous monitoring of ground elevation based on relative surface deformation with InSAR until storage facility achieves stabilization.
Passive Seismicity	Project will plan additional seismometer stations sufficient to confidently measure baseline seismicity 5 km from injection area.	The data collected in the surface seismometers will be continuously recorded and analyzed for potential seismicity magnitudes and hypocenter locations.	N/A

Table 4-8a. Logging Program for Deadwood Injector Well (McCall-1 [proposed])

Log	Justification	NDAC Section
Cased Hole Logs: ultrasonic CBL (cement bond log), VDL (variable-density log), GR (gamma ray), Temperature Log	Identify cement bond quality radially. Detect cement channels. Evaluate the cement top and zonal isolation.	43-05-01-11.2(1c[2])
Triple Combo (resistivity, density,* neutron,* GR, caliper) and SP (spontaneous potential)	Quantify variability in reservoir properties such as resistivity and lithology. Identify the wellbore volume to calculate the required cement volume. Provide input for enhanced geomodeling and predictive simulation of CO ₂ injection into the interest zones to improve test design and interpretations.	43-05-01-11.2(1c[1])
*No density or neutron in surface section.		
Temperature Log	Monitor wellbore temperature in the openhole. A temperature log will also be run in cased hole for temperature to DTS calibration.	43-05-01-11.2(1c[2])
Spectral GR	Identify clays and lithology that could affect injectivity.	43-05-01-11.2(2)
Dipole Sonic and 4-Arm Caliper	Identify mechanical properties including stress anisotropy. Provide compression and shear waves for seismic tie-in and quantitative analysis of the seismic data.	43-05-01-11.2(1c[1])
Fracture Finder Log	Quantify fractures in the Broom Creek and Black Island/Deadwood Formations and confining layers to ensure safe, long-term storage of CO ₂ .	43-05-01-11.2(1c[1])
MDT (modular dynamics testing) Fluid Sampling	Collect fluid samples from the Broom Creek and Deadwood Formations for geochemical testing and TDS quantification.	43-05-01-11.2(2)
MDT Formation Pressure Testing	Collect reservoir pressure tests to establish a pressure profile and mobility.	43-05-01-11.2(2)
MDT Stress Testing	Collect breakdown pressure, fracture propagation pressure, fracture closure pressure (minimum in situ stress) to establish injection pressure limits.	43-05-01-11.2(1c[1])
Sidewall Cores	Sidewall cores will be collected from the injection zones and associated confining zones.	43-05-01-11.2(2)

Table 4-8b. Logging Program for Deadwood Monitor Well (NRDT-1 proposed monitoring well)

Log	Justification	NDAC Section
Cased Hole Logs: Ultrasonic CBL, VDI, GR, Temperature Log	Identify cement bond quality radially. Detect cement channels. Evaluate the cement top and zonal isolation.	43-05-01-11.2(1c[2])
Triple Combo and SP	Quantify variability in reservoir properties such as resistivity and lithology. Identify the wellbore volume to calculate the required cement volume. Provide input for enhanced geomodeling and predictive simulation of CO ₂ injection into the interest zones to improve test design and interpretations.	43-05-01-11.2(1c[1])
Temperature Log	Monitor wellbore temperature in the openhole. A temperature log will also be run in cased hole for temperature to DTS calibration.	43-05-01-11.2(1c[2])
Dipole Sonic and 4-Arm Caliper	Identify mechanical properties including stress anisotropy. Provide compression and shear waves for seismic tie-in and quantitative analysis of the seismic data.	43-05-01-11.2(1c[1])

Tables 4-8a and 4-8b describe the logging programs for the Deadwood injector (McCall-1) and the monitoring (NRDT-1) wells (Figure 4-5). Included in the table is a description of logs collected. These wellbore data have been integrated with preoperational (baseline) 3D seismic and 2D seismic lines to provide a detailed reservoir and structural description for the geologic model and inform the reservoir simulations that are used to characterize the initial state of the reservoir before injection operations. The simulated CO₂ plumes that are based on the current geologic model and simulations are shown in Figures 4-6 and 4-7. These simulated CO₂ plume extents inform the timing and frequency of the application of the direct and indirect monitoring methods of the testing and monitoring plan.

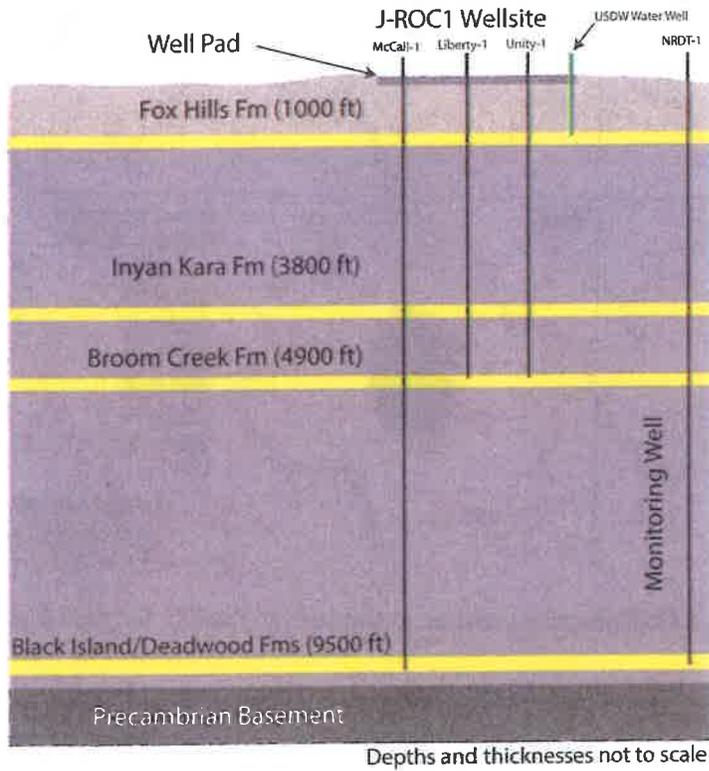


Figure 4-5. Monitoring schematic (not to scale) includes the location of the two Broom Creek injectors (Liberty-1 and Unity-1 [proposed]), the Deadwood injector (McCall-1 [proposed]), and monitoring well NRDT-1 (proposed).

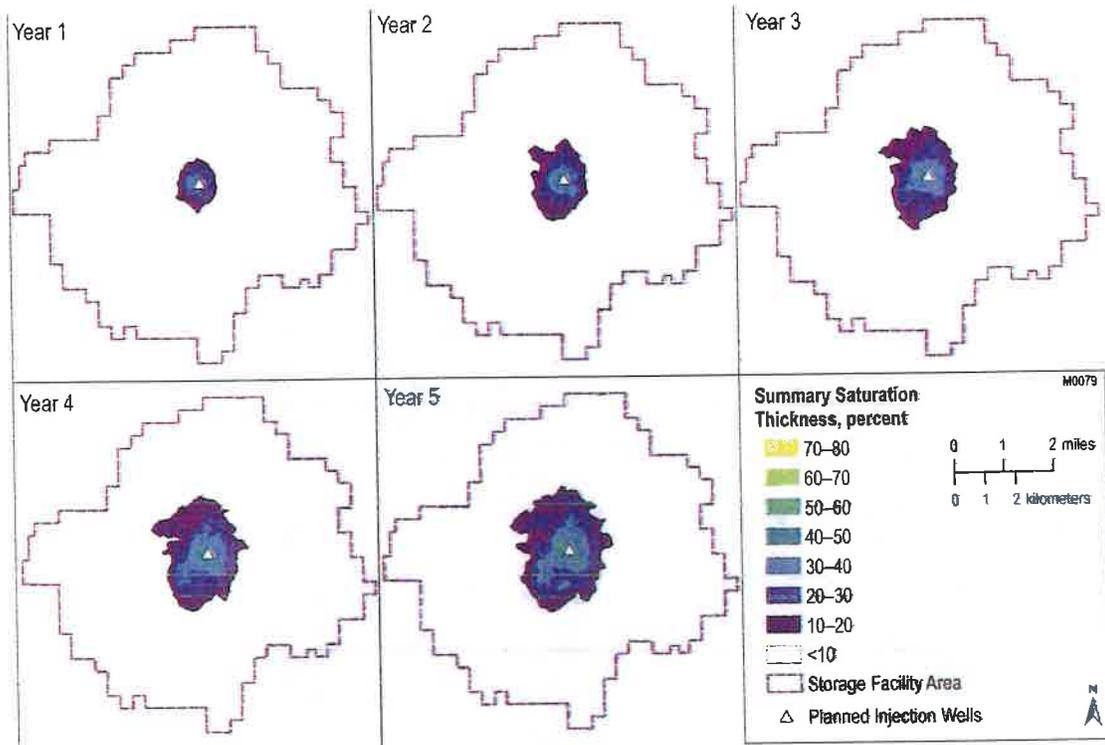


Figure 4-6. Simulated CO₂ plume saturation at the end of Years 1 through 5 after initial CO₂ injection.

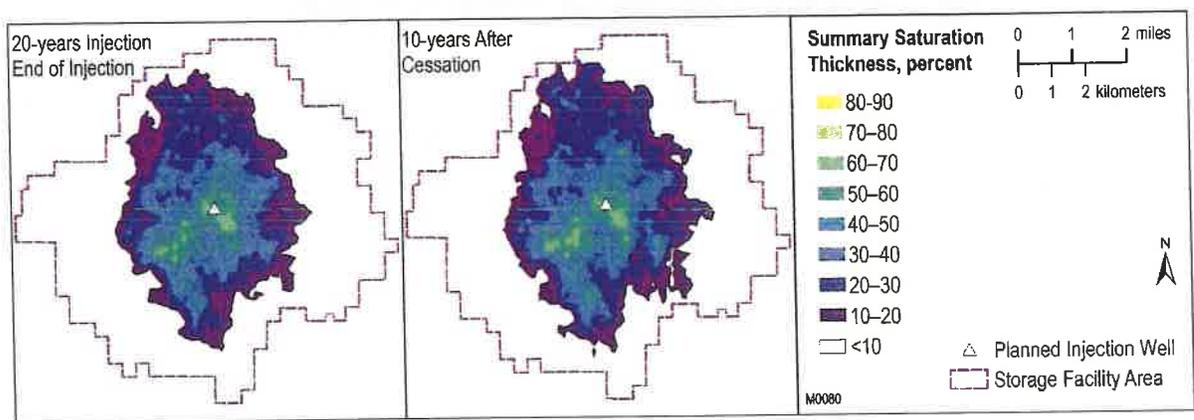


Figure 4-7. Simulated extent of the CO₂ plume at the cessation of injection and the postinjection stabilized plume.

4.1.8.1 Direct Monitoring Methods

To directly monitor and track the extent of the CO₂ plume within the storage reservoir, the injection (McCall-1) and monitoring (NRDT-1) wells will be equipped with tubing conveyed temperature (borehole temperature) and pressure (borehole pressure) gauges as well as casing deployed distributed fiber optics sensing systems (see Figures 4-8 and 4-9). Continuous reservoir temperature and pressure will be monitored in the Deadwood Formation and temperature in the overlying confining zone. Monitoring of the overlying interval can provide an early warning of out-of-zone migration of fluids, which provides sufficient time for the development and implementation of mitigation strategies to ensure these migrating fluids do not impact a USDW or reach the surface.

The fiber optic sensing system installed within the McCall-1 (proposed) and NRDT-1 proposed monitoring wells will be used to acquire continuous high-resolution temperature data. PNLs of the injection and monitoring wells will also be performed on a 5-year schedule basis to demonstrate that fluids are not moving beyond the sealing formations. Preoperational baseline PNL data will be collected in the injection and monitoring wells. These time-lapse saturation data will be used to monitor for CO₂ in the formation directly above the storage reservoir, otherwise known as the above-zone monitoring interval, or AZMI, as an assurance-monitoring technique.

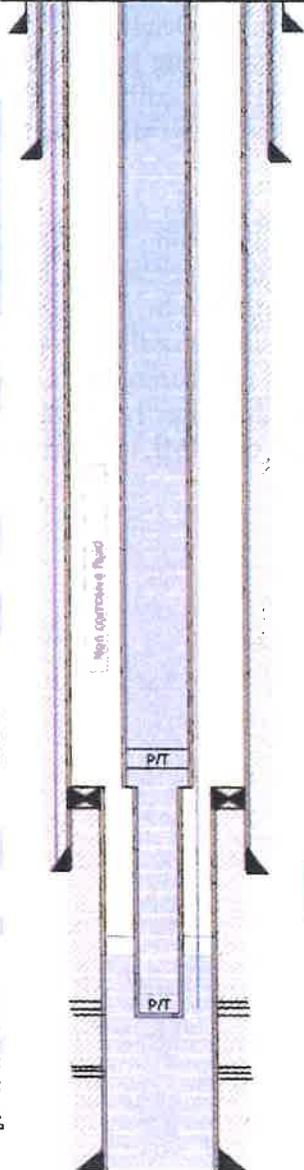


**McCall-1
(Deadwood Injector)**

KB: 2022 ft / GL: 1997 ft
Latitude / Longitude : 47.0637202 N; 101.2139405 W

Temp 90 F / Max Pressure 2800psi
Injection Rate 0.7-1.5 Mtoe/d

Fox Hills	980 ft
Pierre	2150 ft
Greenhorn	3012 ft
Mowry	3404 ft
Skull Creek	3458 ft
Inyan Kara	3586 ft
Swift	3865 ft
Rierson	4324 ft
Piper-Kline	4484 ft
Piper-Picard	4594 ft
Opache	4682 ft
Broom Creek	4740 ft
Amsden	4974 ft
Lodgepole	6265 ft
Interlake	7933 ft
Icebox	9170 ft
Black Island	9282 ft
Deadwood	9316 ft
Precambrian	9762 ft



Completion:

- Tubing 5 1/2" 17# L80 coated, Premium Conn @ 7250 ft X/O
- Tubing 4 1/2" 12.6# L80 coated, Premium Conn @ 9230 ft
- Packer 4 1/2" x 1" @ 9230 ft, Nickel Plated, HBMR elastomers
- Tail Pipe 4 1/2" 12.6# L80 13 CR Premium Conn

Inhibited Packer Fluid 10 ppg

(Packer will be set 50 ft from top perf based on log)

Casing-deployed Fiber Optic Sensing System DTS/DAS-capable
Tubing-deployed Pressure & Temperature Gauges [2]

Figure 4-8. McCall-1 Deadwood injection wellbore schematic showing placement of tubing-deployed pressure and temperature-monitoring gauges and casing-deployed fiber optic sensing system (DTS/DAS-capable).



**NRDT-1
Monitor Well
Broom Creek / Deadwood**

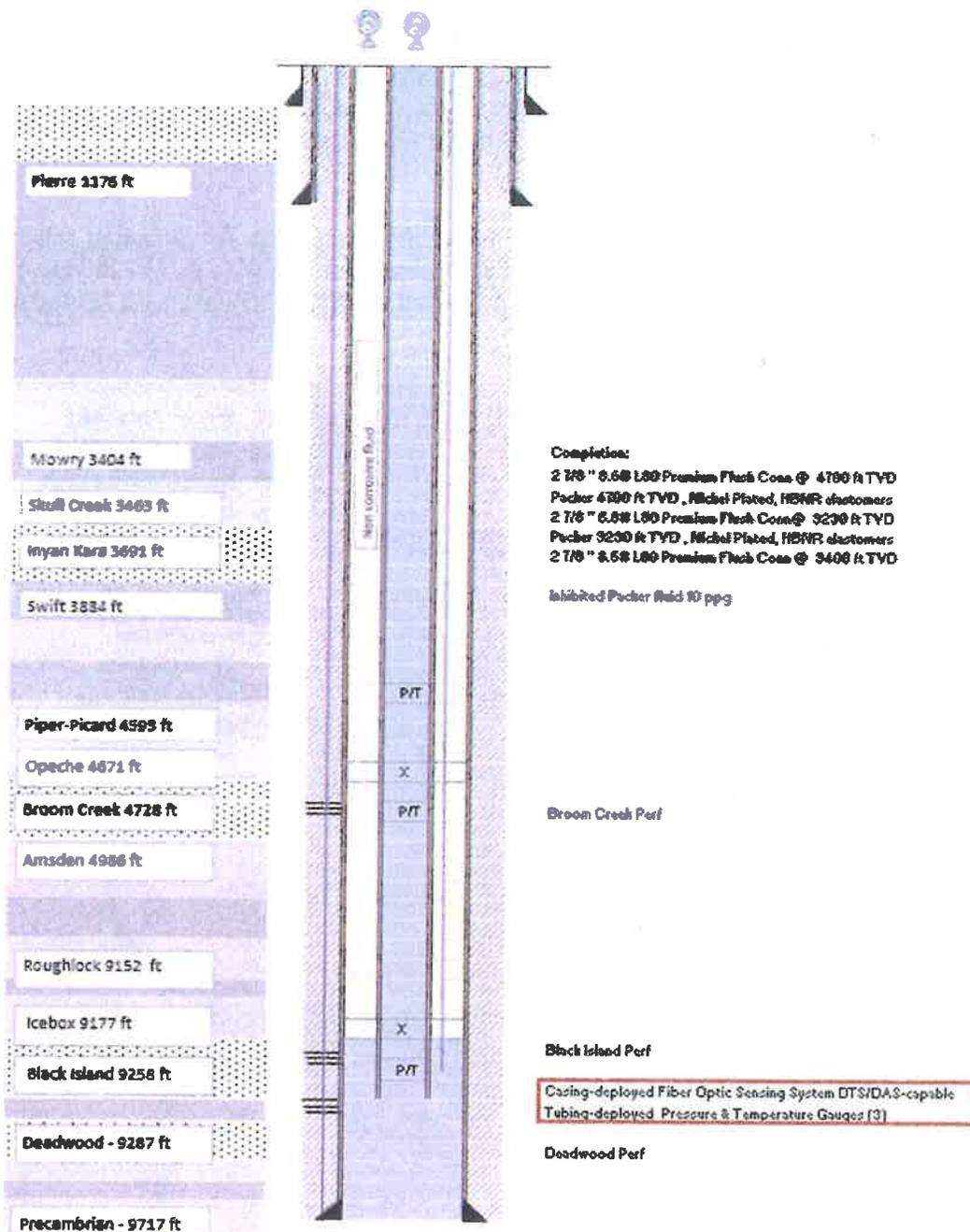


Figure 4-9. Broom Creek and Deadwood monitoring wellbore schematic showing placement of tubing-deployed pressure and temperature-monitoring gauges and casing-deployed fiber optic sensing system (DTS/DAS-capable).

4.1.8.2 Indirect Monitoring Methods

Indirect monitoring methods will also track the extent of the CO₂ plume within the storage reservoir and can be accomplished by performing time-lapse geophysical surveys of the AOR. A 3D seismic survey was conducted to establish baseline conditions in the storage reservoir. Figure 4-10 shows the extent of the injected free-phase CO₂ plume at the end of 20 years of injection relative to the baseline 3D seismic and storage facility area. To demonstrate conformance between the reservoir model simulation and site performance, repeat 2D and/or 3D seismic surveys (4D seismic) will be collected to monitor the extent of the CO₂ plume within the first 5 years of CO₂ injection.

The seismic surveys will also be interpreted for an AVO response for detecting seismic response related to the CO₂ plume. In later years of the operational period (e.g., 10–20 years) if the free-phase CO₂ plume falls outside of the baseline 3D outline, AVO methods, with 2D and 3D

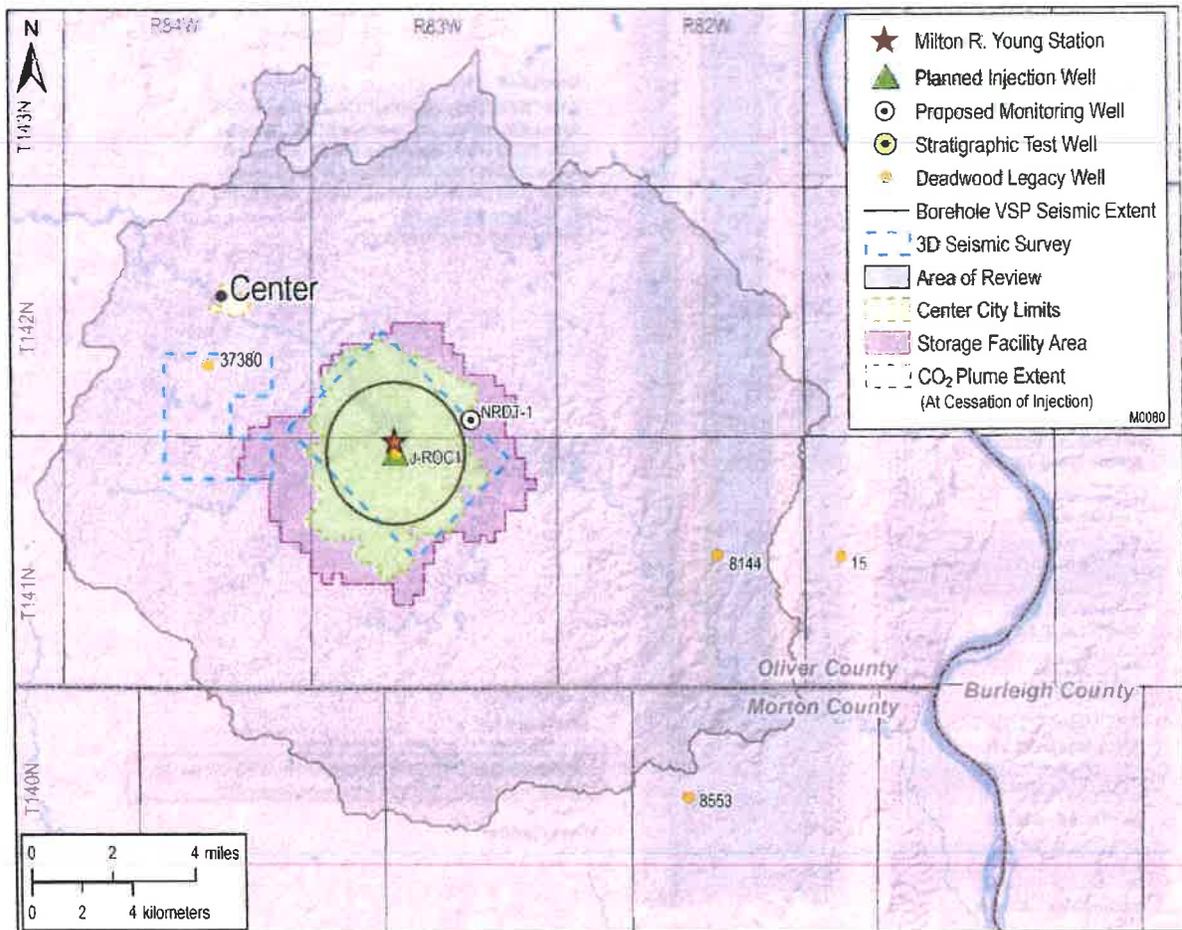


Figure 4-10. Simulated extent of the CO₂ plume at the end of injection operations in green. Surface seismic and borehole VSP seismic data outlines shown on the map will provide coverage for indirectly monitoring the predicted extents of the CO₂ plume over time.

prestack seismic, can be implemented as a standalone method for monitoring CO₂ migration. If it is found that the AVO method is not effective, the baseline 2D and/or 3D will need to be extended for sufficient time-lapse coverage. This seismic monitoring data will provide confirmation of the simulation predictions and confirm the extent of the CO₂ plume within the AOR. Through the operational phase of the project, the 4D seismic monitoring plan will be adapted based on updated simulations of the predicted extents of the CO₂ plume. At the end of the operational phase, 4D seismic and/or AVO methods will be utilized during the postinjection period to confirm stabilization of the plume, as defined in Appendix A. The monitoring plan will be reevaluated at least every 5 years to determine if the testing and monitoring plan is sufficiently characterizing of the migrating CO₂ plume.

The time-lapse seismic response (4D seismic) and AVO method provide measurements of the change in fluid compressibility. Since CO₂ is a highly compressible fluid, it can be tracked with conventional seismic methods. Borehole seismic (3D vertical seismic profile [VSP]) methods are effective for monitoring the distribution of the CO₂ plume. During CO₂ injection operations, the DAS fiber optic system provides a cost-effective and higher-resolution opportunity for monitoring the extents of the CO₂ injection with a 3D VSP. The extent of 3D VSP coverage for the Deadwood Formation will be limited relative to the predicted plume extents. The 3D VSP method should be implemented early in the operational period (i.e., within the first 10 years) when the simulated plume extent is predicted to be well within the possible 3D VSP coverage. The maximum radius of the 3D VSP image area, as a rule of thumb, can be estimated to be approximately the equivalent of the depth of the formation being imaged. Once the radius of the injected plume exceeds the depth to the Deadwood Formation (~9,000 ft), the 3D VSP recorded in the injection well will not adequately monitor the plume. At this point, surface seismic (i.e., 4D seismic and/or AVO) is an appropriate method for monitoring the advancing plume.

Throughout the operational phase of injection operations, continuous monitoring of seismicity will be performed. Existing seismometer stations and additional stations will be installed (“array” of surface seismometers) sufficient to confidently measure baseline seismicity 5 km from injection. The data collected in the surface seismometers will be continuously recorded and analyzed for potential seismicity magnitudes and hypocenter locations. These seismometer stations with broadband sensors are capable of continuously measuring a wide range of seismicity (micro/macro events). Baseline passive seismic data will be collected both prior to injection as well as throughout the operational phase of the project.

InSAR (Vasco and others, 2020), which can detect small-scale surface ground deformation, has been shown to be one such technique for approximately mapping pressure distribution associated with subsurface fluid injection (Reed, 2021). Geodetic methods, like InSAR, are widely available and allow for multiple nonunique interpretations requiring integration with other monitoring methods (e.g., time-lapse seismic). InSAR requires continuous satellite coverage with consistent surface reflectivity (Vasco and others, 2020). In areas where there is snowfall, agricultural changes, or erosional features, the InSAR results will be uncertain and unreliable for elevation changes. To improve InSAR measurement sensitivity, reflectivity challenges can be mitigated by installing stable reflective monuments.

At the conclusion of the operating phase of the project, the monitoring program will permit an assessment of the long-term containment and stability of the injected CO₂ within the storage complex. This assessment is required to secure a certificate of project completion from NDIC. To this end, monitoring of the storage complex will continue following the cessation of CO₂ injection until it can be established that the injected CO₂ plume is stable.

4.1.9 Quality Control and Surveillance Plan

Minnkota has developed a quality control and surveillance plan (QASP) as part of the testing and monitoring plan. The QCSP is provided in Appendix D of this permit.

4.2 Emergency and Remedial Response Plan

Minnkota developed a comprehensive emergency and remedial response plan (ERRP) for the Tundra SGS site, indicating what actions would be necessary in the unlikely event of an emergency at the Tundra SGS site or within the AOR. The ERRP describes the potential affected resources and provides that site operators know which entities and individuals are to be notified and what actions need to be taken to expeditiously mitigate any emergency and protect human health, safety, and the environment (HSE), including USDWs.

This ERRP describes actions the operator of Tundra SGS shall take in the event of an emergency that could endanger any USDW within the project AOR during construction, operation, or postinjection site care. Such events may include unplanned CO₂ release or detection of unexpected subsurface movement of CO₂ or associated fluids in or from the injection zone.

This ERRP incorporates the risk analysis and evaluation of Tundra SGS, including monitoring wells, monitoring system, injection well network, and CO₂ flowline from the capture facility to the storage site. The ERRP is provided in Appendix E of this permit.

4.2.1 Description of Project Area

The Tundra SGS site includes mostly land associated with the coal-mining operation from BNI Coal, the area where MRYS is located, and land primarily used for agriculture activities (Figure 4-11). The closest highly populated area is Center, North Dakota, which is approximately 3.3 mi northwest of the Tundra SGS site.

The Tundra SGS project area consists of existing groundwater wells varying in type/use and located in shallow aquifers ranging in depth. Two wells penetrate the Fox Hills Formation (deepest USDW) and will be sampled (preinjection, operational, and postoperational) for periodic monitoring (ID 14108411AA and ID 14208424BBA). In addition, Minnkota will be installing a Fox Hills Formation monitoring well (NRDT-1) at the injection wellsite (McCall-1). Detailed information on the freshwater resources and protection of USDWs in the AOR can be found in Section 3.4 Protection of USDWs.

Section 2.6 in the Geologic Exhibits addresses any potential mineral zones within the project area.

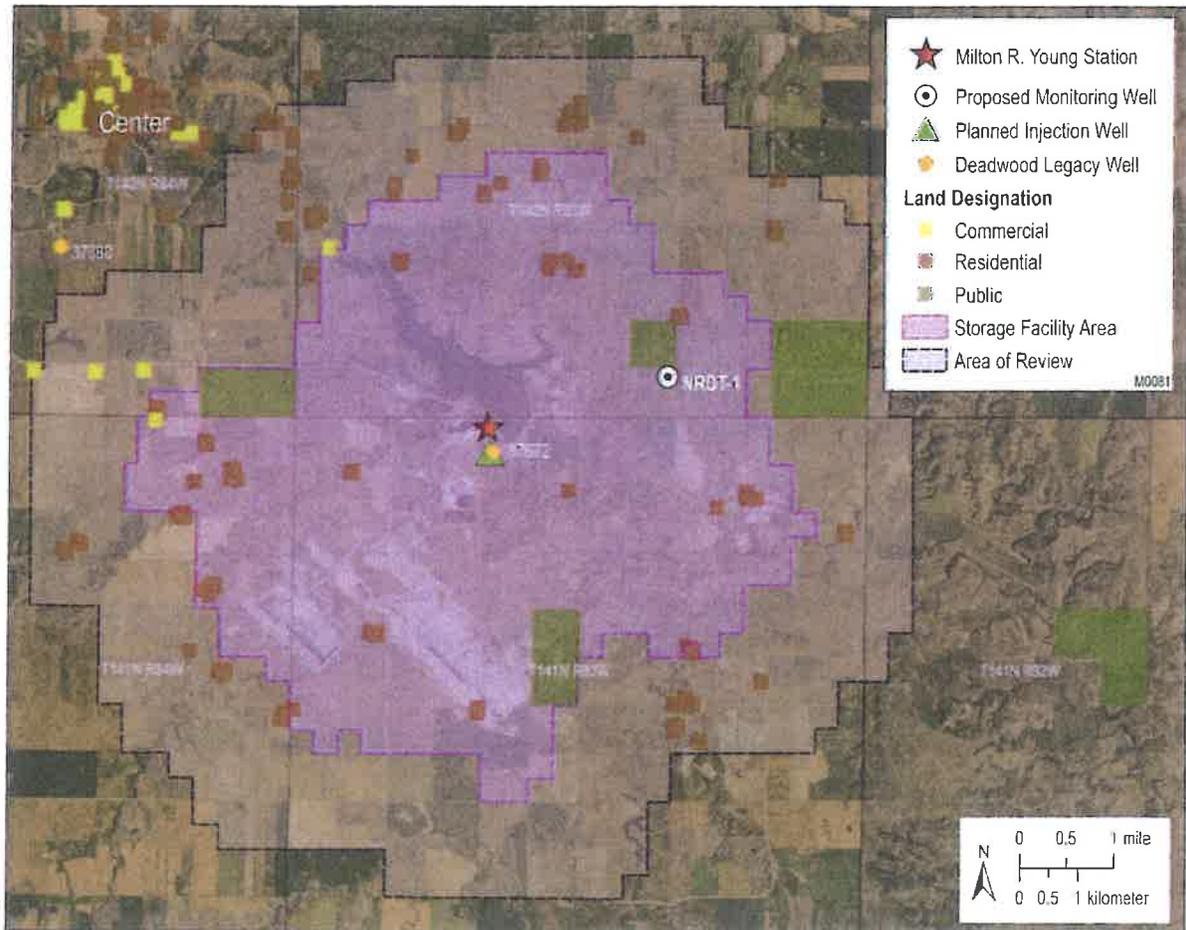


Figure 4-11. Residential, commercial, and public land use within 1 mi of the storage facility boundary.

4.2.2 Risk Identification and Severity

Several scenarios could activate an emergency response. This ERRP considers any adverse incident with the potential of causing personal injuries, USDW contamination, or property damage as an “event.” The scope of response, actions, and order of activities will be proportional to the severity and impacts of the event and implemented as outlined in this ERRP. The events identified during technical reviews for the Tundra SGS are listed in Table 4-9. Appendix E contains a response protocol for each event identified in Table 4-9. The protocols may be modified and refined based on the specific circumstances and conditions of the event as well as any discussion with governmental authorities having jurisdiction.

Table 4-9. Risk Category Matrix

<p>Construction Period</p> <ul style="list-style-type: none"> • Well control event while drilling or completing the well with loss of containment • Movement of brine between formations during drilling • Presence of H₂S while drilling or completing the well
<p>Injection Period</p> <ul style="list-style-type: none"> • Loss of mechanical integrity (flowlines, injection, monitoring wells, disposal well) • Loss of containment (LOC): vertical migration of CO₂/brines via injection wells, monitor wells, Class I wells, P&A wells, and undocumented wells • LOC: lateral migration of CO₂ outside of defined AOR • LOC: vertical migration due to failure in the confining zone, faults, and fractures • External impact in flowlines, wells, and infrastructure • Monitoring equipment failure or malfunction • Induced seismicity • Seismic event • Other natural disaster
<p>Postinjection Site-Care Period</p> <ul style="list-style-type: none"> • Loss of mechanical integrity (monitoring wells) • LOC: vertical migration of CO₂/brines via monitoring, wells, Class I wells, P&A wells, and undocumented wells • LOC: lateral migration of CO₂ outside of defined AOR • LOC: vertical migration due to failure in the confining zone, faults, and fractures • External impact in monitoring wells • Monitoring equipment failure or malfunction • Natural seismicity • Other natural disaster

Event severity is classified as major emergency, serious emergency, and minor emergency, according to the Table 4-10 description.

Table 4-10 Severity Matrix

Consequence Degree of Severity	Definition
Major Emergency	Event poses immediate substantial risk to human health, resources, or infrastructure. Emergency actions involving local authorities (evacuation or isolation of areas) should be initiated. Example: well blowout while injecting
Serious Emergency	Event poses potential serious (or significant) near-term risk to human health, resources, or infrastructure if conditions worsen or no response actions are taken. Example: malfunction of monitoring equipment for pressure or temperature that may indicate a problem with the injection well and possible endangerment of public health and the environment
Minor Emergency	Event poses no immediate risk to human health, resources, or infrastructure. Example: higher pressure reading observed in monitoring wells, with no potential to move fluid

If information from the monitoring network, alarm system, field operators, or external reports evidences a potential leak of CO₂ or formation fluids from any well or surface facility including any pressure change or monitoring data which indicates the presence of a leak or loss of containment from the storage reservoir or concern for the mechanical integrity of the system, the following actions will be taken:

1. The project will activate the emergency and remediation response protocol consistent with this ERRP and circumstances of the event.
2. The NDIC Department of Mineral Resources (DMR) Underground Injection Control Program director (UIC program director) will be immediately notified within 24 hours of the event being discovered.

The UIC program director may allow the operator to resume injection prior to remediation if the storage operator demonstrates that the injection operation will not endanger USDWs.

4.2.3 Response Protocols

Discovery of an event triggers the corresponding response plan proposed in herein. Response plan actions and activities will depend upon the circumstances and severity of the event. The Tundra SGS operator will address an event immediately and, when required, will communicate the event to the UIC program director within 24 hours of discovery.

The protocols described in this document are conceptual and may be adjusted based on actual circumstances and conditions of the event and any previous communication with governmental authorities having jurisdiction.

If an event triggers cessation of injection and remedial actions, Tundra SGS shall demonstrate the efficacy of the response actions to the satisfaction of the UIC program director before resuming injection operations. Injection operations shall only resume upon receipt of written authorization of the UIC program director.

For each of the scenarios identified in the risk screening, a detailed description of the mitigation and monitoring techniques is included in Appendix E.

4.2.4 Emergency Contacts

If an event is discovered, the Tundra SGS superintendent and HSE supervisor on duty will be notified immediately. The superintendent will be responsible for notifying off-site emergency response agencies and resources (Table 4-11). The superintendent shall also be responsible for notifying the UIC program director (Table 4-12) within 24 hours of initial discovery. Additional emergency response providers are listed in Table 4-13.

Table 4-11 Outside Emergency Response

	Agency	Location	Phone
Fire	Oliver County Rural Fire Protection District (volunteer department)	106 East Main Street, Center, ND	Phone: 911 or 701.794.3210
Ambulance	Oliver County Ambulance Service (volunteer basic life support service)	111 Main Street, Center, ND	Phone: 911– Ambulance Garage 701.794.8828 Cell 701.220.1329
Helicopter Air Care (MRYS ERT trains with Sanford AirMed and can be requested if needed, based on emergency)	Sanford AirMed	Bismarck, ND	Phone 911 or Sanford AirMed Dispatch 1.800.437.6886 Sioux Falls, SD, Office 844.424.7633
State Police	North Dakota Highway Patrol	600 East Boulevard Avenue Bismarck, ND	Phone: 911 or State Radio Dispatch 701.328.9921 Office 701.328.2447
Sheriff	Oliver County Sheriff Dave Hilliard	PO Box 362, Center, ND	Phone 911 Office 701.794.3450
Emergency Response Team (ERT)	MRYS Emergency Rescue Team	3401 24th Street Southeast, Center, ND	Phone 701.794.8711 or use the Plant Gaitronics intercom system to call “U1 Control Room” and report the emergency. The operator will sound the alarm for the ERT.

Table 4-12. NDIC DMR UIC Contact

Company	Service	Location	Phone
NDIC DMR	Class VI/CCUS Supervisor	Bismarck, ND	701-328-8020

Table 4-13. Potential Contractor and Services Providers (name available)

Company	Service	Location	Phone
Baranko Brothers	Excavation & Dirt Work/Hauling	Dickinson, ND	701-690-7279
Cyclone	Drilling rig	Gillette, WY	307-660-2370
Enerstar	Housing & Rentals	Bismarck, ND	701-934-1557
GeothermEx	Site Management/Drilling Supervisor Services	Houston, TX	281-769-4517
Schlumberger	Cementing,	Denver, CO	720-272-5288
	Core Analysis	Houston, TX	801-232-5799
	Direction & Measurements	Denver, CO	484-522-8434
	Products & Services	Denver, CO	517-755-9050
	Cameron Surface	Denver, CO/Minot, ND	970-260-4260
	Bits	Denver, CO/Williston, ND	303-518-6135
	Completions	Houston, TX	440-391-2711
Reservoir Group	Coring	Denver, CO/Houston, TX	832-350-5292
Rud Oil	Diesel	Center, ND	701-794-3165
Go Wireline	Wireline Tool/Fishing Services	Dickinson/Williston, ND	406-480-1086
MI SWACO	Drilling Fluids		661-549-3645
Sunburst Mudlogging	Logging/Geologic Services	Billings, MT	406-860-1228
Innovative Solutions	Solids Control	Williston, ND	701-770-0359
WellPro Inc	Fishing Equipment	Dickinson, ND	701-227-3737
Creek Oilfield Services	Waste Disposal/Casing Runnig/Supply	Williston/Bismarck, ND	701-590-5859 715-563-7543
Environmental Solutions	Cuttings Disposal	Belfield, ND	701-300-1156
Waste Management	Trash	Bismarck, ND	701-214-9741
ASK Transportations	Bulk fresh Water	Williston, ND	701-580-5627
Darby Welding	Welding	Dickinson, ND	701-483-5896
Panther PPT	Bop testing	Watford, ND	701-227-3737
Wyoming Casing	Casing Services	Williston, ND	701-290-8522
CCS	Tank Farm	Cody, WY	701-260-7780
MVTL Lab	Formation Fluids Collection	Bismarck, ND	701-204-5478
Petroleum Services	Casing (Float, Centralizer)	Williston, ND	701-770-1763

4.2.5 Emergency Communications Plan

Prior to the commencement of CO₂ injection operations, the Tundra SGS operator will communicate in writing with landowners living adjacent to the storage site to provide a summary of the information contained within this ERRP, including, but not limited to, information about the nature of the operations, operator contact list, potential risks, and possible response approaches.

An emergency contact list will be maintained during the life of the project. In the occurrence of an event, the superintendent will start the contact list and make sure that responsible, essential personnel are contacted. The operator's designated personnel will handle all event communications with the public.

The Tundra SGS operators will communicate adequate information to the public about any event to allow public understanding to the extent reasonably practicable, considering the circumstances leading to the event and any known environmental or safety implications. The amount of information, timing, and communications method(s) will be appropriate based upon the circumstances and severity of the event, which may include, but is not limited to, the following:

1. Event description and location.
2. Event investigation process, and response status (e.g., actions taken).
3. Whether there is any known impact to the drinking water or other environmental resources.
4. Any known injury to a person or property.

For protracted responses (e.g., passive monitoring or ongoing cleanups), the project will provide periodic updates on the progress of the response action(s).

4.2.6 ERRP Review

ERRP will be reviewed no less than:

- a. Annually.
- b. Following any significant changes to the Tundra SGS facility, such as AOR reevaluation or addition of injection or monitoring wells, on a schedule determined by the UIC program director.
- c. When required by the UIC program director.

If the review indicates that no amendments to the ERRP are necessary, the Tundra SGS operator will provide the documentation supporting the "no amendment necessary" determination to the UIC program director.

If the review indicates that amendments to the ERRP are necessary, amendments shall be made and submitted to Tundra SGS as soon as reasonably practicable, but in no event later than 1 year following the commencement of a review.

4.3 Financial Assurance Demonstration Plan

The FADP has been prepared in accordance with NDAC § 43-05-01-09.1. The FADP describes actions the operator of Tundra SGS has taken and shall take to ensure state and federal regulators that sufficient financial support is in place to:

- a) Cover the cost of any corrective action that may be required at the geologic storage facility during any of its phases of operation, well plugging, postinjection site care and facility closure, ERR, and endangerment to USDWs.
- b) Provide funds for routine monitoring and reporting activities by Minnkota during injection operations, closure activities, and an extended postclosure period as determined by regulatory agencies

While there are two separate storage reservoirs, these two separate reservoirs are commonly operated as dedicated Tundra SGS for a single CCS facility. The FADP was prepared to account for the entire operation of the Tundra SGS.

This FADP takes into account Tundra SGS storage facility permits and associated Class VI drilling permits in satisfying NDIC regulations contained in Title 43, Chapter 5, et seq. In preparing the FADP, U.S. Environmental Protection Agency (EPA) guidance was also considered in assessing the effectiveness of multiple qualifying financial instruments in the context of the Tundra SGS project, e.g., key aspects of long-term public confidence, optimization of stakeholder interests, and practicality of implementation.

Based on review and consideration of the available financial instruments contained in NDAC § 43-05-01-09.1, Minnkota proposes to use a combination of commercial insurance and a trust fund to fulfill the FADP requirements of the Class VI permits. The details contained in this FADP, along with supporting documentation, establish the approach Minnkota proposes to use to meet the financial responsibility requirements and that each of these instruments sufficiently addresses the activities and costs associated with the corrective action plan, injection well-plugging program, postinjection site care and facility closure, ERRP, and endangerment of USDWs.

Each of these instruments is described in full in subsequent subsections of this FADP and in Appendix G. Information related to the financial instruments will be updated on an annual basis and submitted to NDIC for review and approval as required under § NDAC 43-05-01-09.1.

4.3.1 Approach to Meeting Financial Responsibility Requirements

In accordance with the requirements contained in NDAC § 43-05-01-09.1, the FADP provides financial assurance sufficient to cover the activities identified in the corrective action plan, injection well-plugging program, postinjection site care and facility closure, ERRP and to address endangerment of USDWs. The following provides a summary description of the considerations and assessment approach for each component.

4.3.1.1 Corrective Action

According to § 43-05-01-05.1, corrective action involves inventorying and characterizing existing wells in the proposed AOR. The objective of corrective action assessment is planning actions to

take, prior to and over the course of the project operation, on existing wells in order to proactively prevent the movement of fluid into or between USDWs. The detailed AOR can be found in Section 3.0 of this application. Minnkota has determined and asserts that there are no wells in the proposed AOR to which corrective action would be required prior to or during the course of the project operation or postclosure period. For the avoidance of doubt, if wells proposed as part of Tundra SGS operation require corrective action, such action and the costs relating thereto are included as part of the project operating cost.

4.3.1.2 Injection well plugging program

The plugging of injection wells as part of site program closure and as required by NDAC § 43-05-01-11.5 is included within the project cost and is covered within this FADP and proposed instruments. The specifics of the plugging program can be found in Section 4.6. Costs were estimated using work scopes provided by third-party industry experts and comparable actual third-party costs for performance of services and procurement of associated goods. These costs shall be disbursed through the trust as described herein, while the amount associated with well plugging shall be funded following commencement of the operation of the wells. The estimate covers the aggregated cost of abandoning three injector wells, including rig mobilization, rig rentals, cementing, logging and haulage. To ensure a conservative estimate, a 20% contingency was added, and no deductions were made for salvage value of materials.

4.3.1.3 Postinjection site care and Facility closure

Postinjection site care (PISC) and facility closure cost estimates include site monitoring and periodic reassessment of the AOR, facilities maintenance and power costs, and overhead and support costs. Details of the activities and actions contained in the PISC can be found Section 4.0. The largest element of the PISC cost estimate relates to seismic studies, which are required to be carried out at 5-year intervals to validate seismicity models, which are expected to cover an area of up to 25 mi².

4.3.1.4 Emergency and remedial response

The ERRP and associated detailed assessment can be found in Section 4.0. The ERRP assessment supports a determination that the likelihood of release of significant volumes of CO₂ from underground storage into the soil or the atmosphere, or significant volumes of saltwater into the environment, are considered remote. Multiple factors were considered in the development of the ERRP, including:

- a) Extensive and independently verified analysis of the integrity of the storage mechanism.
- b) Selection of qualified and experienced storage facility operator.
- c) Selection of qualified and experienced drilling contractor.

Risk mitigation measures include:

- a) Location of injection facilities away from urban population and in an industrial-zoned, brownfield property.
- b) Continuous monitoring of transportation and injection systems.
- c) Routine measurement and reporting of CO₂ volumes.

- d) Physical security, barriers and signage around injection facilities.
- e) Primary and secondary containment for leaked fluids at injection well pads.

In the interest of providing sufficient financial assurance, Minnkota has compiled cost estimates associated with a conservative hypothetical scenario wherein a significant volume of briny water arises to the surface injection operations. The scenario contemplates a reactive response approach; e.g., mobilization of response personnel and equipment would be upon discovery of such an event. This approach is considered appropriate because of the remoteness of the residual risk. Specific postoccurrence action is not determinable until occurrence; thus actual response to such an event would be based on its severity. Because of the remote likelihood, this single conservative scenario was compiled to account for the outer-limit cost estimate to satisfy event response. The scenario used for cost estimating assumed the optimal operating conditions (10 years of operation) requiring outer limit response and remediation costs. This conservative outer limit cost estimate was calculated and used as a basis for this FADP document.

Dual Utilization of the ERRP Trust Property

Upon authorization from NDIC to begin injecting CO₂ under the Class VI well permit(s), Minnkota must be prepared to undertake any emergency or remedial response (ERR) actions, although such actions are unlikely to be needed. Further, in accordance with North Dakota Century Code (NDCC) § 43-05-01-17, Minnkota must account for a one cent fee on each metric ton of carbon dioxide for administration of a storage facility fund and a fee of seven cents on each ton of CO₂ injected for a storage facility fund which can be utilized for post closure period activities (together referred to as "commission fee"). The average projected amount of CO₂ injected will be 4 MMt annually. Minnkota estimates a minimum of 12 years of operation and is permitting operation of the storage facility for 20 years of injection. Minnkota therefore estimates being required to pay a commission fee of \$320,000.00 annually, with a total commission fee of \$3,840,000.00 by year 12 of operation (\$6,400,000.00 is the cumulative commission fee by Year 20). Minnkota's estimated total cost of ERR activities is \$16,560,000.00, assuming conditions allowing a conservative outer-limit cost estimate (at least 10 years of operation), with \$5,960,000.00 of the estimate funded by the trust. Since the ERR cost estimate exceeds the estimated 12-year commission fee¹ and ERR activities are unlikely to be needed, the account containing the ERR principal and any associated interest may be used at site closure for satisfying the commission fee and commission required closure activities calculated under NDCC § 43-05-01-17. Therefore, Minnkota proposes the account containing the ERR principal and any associated interest to be used at closure (or termination of the trust) to satisfy the commission fee. The trust agreement would allow the trustee to release an amount equal to the total commission fee upon written direction of NDIC from the principal and interest contained in the ERR account in an amount equal to the fee calculated in accordance with § 43-05-01-17 at the time NDIC issues the certificate of closure or termination of the trust, whichever occurs first.

Minnkota proposes that the account associated with the ERR account should be funded with an initial amount sufficient to cover the costs associated with the ERR activities upon issuance of authorization to operate a Class VI injection well. Minnkota proposes an initial funding of an amount equal to the net of the cost estimate for ERR activities less the calculated 12-year commission fee based upon the projected annual average injection rate of 4 MMt, \$2,120,000.00.

¹ Commission fee would not exceed the fund principal amount until Year 18 of operation.

Minnkota will fully fund the ERR activities with seven equal installments annually of \$548,572.00 made in the injection period, with the first installment prior to the 1-year anniversary of NDIC's issuance of authorization to operate a Class VI injection well and the remaining installments to be made individually on the successive anniversary until fully funding the principal amount of \$5,960,000.00. However, if at any time NDIC determines the amount of the commission fee exceeds the principal amount then contained in the ERR account, then upon written direction from NDIC, grantor shall fund amounts sufficient to cover the commission fee calculated in accordance with NDCC § 43-05-01-17.

4.3.1.5 Endangerment of Drinking Water Sources

As discussed in the ERRP subsection, the risk of endangerment to USDW is considered remote. However, as part of the reactive response scenario contemplated in the ERRP cost estimate, Minnkota assessed the specific response actions and cost data to represent the likely impact of such an event on sources of drinking water. Because of precautions taken in the design for spill control and pollution prevention, the well pad design incorporates two liners and a berm that, in combination with the response strategy, would minimize this portion of environmental repair. Thus Minnkota assessed the second reactive scenario, which contemplates a subsurface leak scenario. This subsurface leak scenario has primary costs relate to groundwater delineation and an extended period (10 years) of quarterly monitoring and reporting after emergency remedial actions are taken.

4.3.2 Approach to Financial Risk

Minnkota formed a task force (TF) to understand and quantify project risks. The TF consisted of 14 members with relevant professional qualifications and experience in subsurface analysis, facilities engineering, drilling engineering, operations, finance, environmental protection, or risk engineering. The TF identified and quantified the likelihood and impact of multiple risks using industry-standard methodology and methods. Four working sessions, each between 3 and 4 hours in duration, were conducted, and the TF reached consensus on the assessment of risks underlying various aspects of the project. The findings of the TF support the understanding of financial risks and the approach to FADP described in this document.

4.3.3 Selected Elements of Minnkota's Analysis of Inherent Risks

The projected AOR includes mostly land associated with the coal-mining operations of BNI, the area where MRYS is located, and land primarily used for agriculture activities. Residents and man-made structures are scattered across the surface. The closest highly populated area is the town of Center, North Dakota, approximately 3.3 mi northwest of the proposed Tundra SGS facility boundary.

From the surface to the lowermost USDW—the Fox Hills Aquifer—the groundwater is considered a protected aquifer with <10,000 ppm TDS. The Fox Hills base is estimated at approximately 1,000 ft and is followed by a thick section of clays with a thickness of approximately 2,600 ft. These clays act as a seal until the next major permeable zone, the Inyan Kara. The Inyan Kara is an underpressured formation that is classified as an exempt aquifer under NDCC § 43-02-05-03 west of the 83W range line, and this formation is mostly targeted for water disposal wells in those areas. Approximately 900 ft of cap rock acts as a main seal between the Inyan Kara zone and the shallowest of the two injection reservoirs: the Broom Creek.

Inside the AOR, 64 water wells are located in shallow aquifers, providing water for the associated farms' livestock, irrigation, and localized consumption. Two wells that penetrate the Fox Hills Formation will be used as tools for monitoring the USDW (ID 14108411AA and ID 14208424BBA). The project will install one additional USDW well, as described in the monitoring plan, to sample underground water.

No producible mineral, oil, natural gas, or other reserves are reported in the AOR for the Deadwood Formation or overlying formations. As described in the AOR and corrective action section, for the Tundra SGS storage reservoir and drilling applications, there are three deep wells (one oil and gas [O&G] exploration, two stratigraphic) within or in proximity to the plume boundaries and the identified pressure front: these wells are identified as BNI-1 (API 33065000180000), Herbert Dresser 1-34 (API 33065000050000), and J-LOC1 (33065000190000). J-LOC1 will be converted to a pressure monitoring well for Tundra SGS or will be permanently abandoned, and the other two wells were analyzed and included in the risk assessment as well as in the corrective action plan.

4.3.4 Cost Estimates

Tables in this section provide a detailed estimate, in current dollars, of the cost of performing corrective action on wells in the AOR, plugging the injection well, postinjection site care and facility closure, and ERR. Table 4-14 is a summary of the cost estimates underlying the FADP document, identifying proposed financial instrument(s) that will provide the appropriate assurance to regulatory agencies of Minnkota's intent and ability to fulfil its responsibilities.

Cost estimates assume that these costs would be incurred if a third party were contracted to perform these activities. For that reason, the estimate includes costs such as project management and oversight, general and administrative costs, and overhead during the postinjection period, e.g., the use of postinjection seismic surveys.

Table 4-14. Potential Future Costs Covered by Financial Assurance in \$K

Activity	Total Cost	Covered by Special-Purpose Trust	Covered by Commercial Insurance	Details in Supporting Table
Corrective Action on Wells in AOR	\$0	\$0	\$0	NA
Plugging Injection Wells	\$2,025	\$2,025	\$0	Table 4-14-1
Postinjection Site Care	\$10,285	\$10,285	\$0	Table 4-14-2
Site Closure	\$1,554	\$1,554	\$0	Table 4-14-3
Emergency and Remedial Response	\$16,560	\$5,960	\$10,600	Table 4-14-4
Endangerment of USDWs	\$2,240	\$0	\$2,240	Table 4-14-5
Total	\$32,664	\$19,824	\$12,840	

The values included in the FADP are based on cost estimates provided during the permit application development process and are based on the hiring of a third party to perform the services or procurement of goods associated with performance. Cost estimates are based upon historic price data from other projects managed by Oxy Low Carbon Ventures (OLCV), cost quotes from third-party companies, regulatory guidance documents, and professional judgment about the level of effort required to complete an activity. These values are subject to change during the course of the project to account for inflation of costs and any changes to the project that affect the cost of the covered activities. If the cost estimates change, Minnkota will adjust the value of the financial instruments, and any adjustment will be submitted for approval by NDIC as required under NDAC § 43-05-01-09.1(3).

Tables 4-14.1 through 4-14.6 provide detailed breakdowns of the future cost estimates provided in Table 4-14.

Table 4-14-1. Plugging Injection Wells

Activity	Cost
Mobilization and Location	\$435,000
Rig Rates and Daily Cost	\$467,000
Hauling and Disposal	\$57,000
Balance of Plant	\$
Hydrostatic Testing and Scanning	\$
Pipe Rental	\$
Bit and Scrapers	\$
Logging	\$105,000
Casing Crew and Torque	\$40,000
DST Service and Manifold	\$
Sensors and Fiber Optic	\$60,000
Cementing	\$353,000
Perforating Cost	\$
Pumping Truck and Acid	\$
Wellhead Service	\$60,000
Tangibles	\$
Subtotal	\$1,577,000
Contingency	20%
Tax	7%
Total Cost	\$2,025,000

Notes:

- Costs are based on estimates of current contract day rates and materials.
- Costs are based on P&A of a total of three injector wells: two in the Broom Creek Formation and one in the Deadwood Formation.

Table 4-14-2. Postinjection Site Care

Activity	Cost
Monitoring and AOR Revisions (see Table 4-14-3)	\$7,197,000
Overhead and Support	\$1,388,000
Facilities Maintenance and Power	\$1,700,000
Total	\$10,285,000

Notes:

- Costs are based on estimates of current contract day rates and materials.
- Postinjection seismic survey conducted at 5-year intervals.

**Table 4-14-3. Monitoring and AOR Revisions
(part of postinjection site care)**

Activity	Cost
Gas Soil Probes	\$716,000
3D Seismic Survey – Time Lapse	\$5,000,000
Water Sampling	\$180,000
Saturation Log Monitoring Wells	\$819,000
Annular Pressure Test	\$100,000
AOR Assessment	\$86,000
Casing Inspection Log Monitoring Wells	\$160,000
Optical Gas Imaging	\$72,000
Visual Inspection	\$64,000
Total	\$7,197,000

Table 4-14-4. Site Closure

Activity	Cost
Monitoring Well P&A	\$764,000
Facilities Closure	\$1,020,000
Total Site Closure	\$1,784,000

Notes:

- Costs are based on estimates of current contract day-rates and materials.
- Costs are based on P&A of two monitoring wells.
- Facilities closure estimate includes abandonment in place of buried pipelines.

Table 4-14-5. Emergency and Remedial Response

Activity/Item	Cost
Pump Trucks (twin pump)	\$113,784
Frac Tanks	\$48,000
Vacuum Truck	\$36,000
Dozer	\$18,600
Excavator	\$20,400
Dump Truck	\$32,400
Brine Disposal (no Class I)	\$1,000
Trucking Water	\$11,000
Water Transfer Pump and Personnel Package	\$11,600
Light Towers, Trailers, Generator, Heaters, Communications, etc.	\$7,690
Heater Packages	\$36,000
Fuel Tank Storage	\$3,400
Drill and P&A Relief Well in Broom Creek	\$8,760,000
Special Well Control Team – (e.g., wild well/boots & coats)	\$1,500,000
New Injector Well – Replacement (mob, drill and comp.)	\$5,060,000
Original Injector Well Abandonment	\$900,000
Total	\$16,559,874

Notes:

- These costs are based on activities in response to a hypothetical scenario with remote risk of occurrence.
- A significant portion of these costs, should they be incurred, would be covered by commercial insurance which is an industry standard control of well (COW) coverage.
- Costs are based on estimates of current contract rates.

Table 4-14-6. Endangerment of USDWs

Description	Total Estimated Amount
Subsurface Release to USDW	
General Response Actions	\$6,000
Groundwater Delineation	\$1,290,000
Irrigation/Domestic Well Sampling and Replacement	\$131,000
Quarterly Groundwater Monitoring (10 years) and Reporting	\$760,000
P&A of Groundwater-Monitoring Wells	\$53,000
Total	\$2,240,000

Notes:

- These costs are based on activities in response to a hypothetical scenario with remote risk of occurrence.
- Costs are based on estimates of current contract rates.

4.4 Worker Safety Plan

The worker safety plan (WSP) describes the minimum safety programs, permit activities, and training requirements to deploy during construction, operation, and postinjection site care periods. This document does not limit the application of additional programs and technologies that could improve the safety and performance of the operation.

This WSP incorporates the safety program for the Tundra SGS as a whole. It includes monitoring wells, monitoring system, injection well network, and CO₂ flowline of the storage facility.

4.4.1 Definitions

- a. Confined space** means a space large enough and so configured that an employee can bodily enter and perform assigned work, has limited or restricted means for entry or exit (for example, tanks, vessels, silos, storage bins, hoppers, vaults, and pits or spaces that may have limited means of entry), and is not designed for continuous employee occupancy. This definition could also apply to a trench, bellhole, cellar, or excavation.

Some confined spaces are designated permit-required confined spaces: meaning entry into the space must be controlled through application of a confined space entry permit. A “yes” answer to *any one* of the following questions means the space must be designated “permit-required”:

- Does the space contain, or have the potential to contain, a hazardous atmosphere?
- Does the space contain a material that has the potential for engulfing an entrant?
- Does the space have an internal configuration such that an entrant could be trapped or asphyxiated by inwardly converging walls or a floor that slopes downward and tapers to a smaller cross section?
- Does the space contain any other recognized serious safety or health hazard?
- The confined space entry (CSE) program is provided to protect authorized employees and contractors that will enter permit-required confined spaces.

- b. Contractor** means a company or person performing work, providing services, or supplying equipment at the work site, including its subcontractors.
- c. Hazardous energy** means energy sources, including electrical, mechanical, hydraulic, pneumatic, chemical, thermal, or other sources in machines and equipment, where the unexpected start-up or release of stored energy can result in serious injury or death.
- d. Operator** means the Tundra SGS or any Tundra SGS employee.
- e. Permitted work activities** means activities that require the use of a permit, including but not limited to, confined space entry, lockout/tagout, trenching and excavation, electrical, and hotwork, which require the use of a permit.
- f. Site manager/supervisor** means the operator designated representative in charge of the work site or work.
- g. Work site** means physical location under control of the operator where work is being performed on behalf of the operator.
- h. Work** means task or tasks to be executed by the operator or contractor.
- i. Visitor** means a person or person(s) present at the work site who are there for observational, not work purposes.

4.4.2 Stop Work Authority

Each operator and contractor has the right, obligation, authority, and responsibility to stop any work or action that is unsafe or, if continued, may result in adverse impact to the environment. No operator employee or contractor will be subject to discipline or sanction for stopping any work or

action that they believe in good faith is unsafe or may result in adverse impact to the environment. Work must be stopped in a safe manner and immediately reported to the site manager/supervisor or operator representative. Appropriate actions will be taken to mitigate the hazard before the work will be allowed to commence. Every contractor will have a stop work authority program that advises their employees of their rights to use stop work authority.

4.4.3 Incident Notification and Response

The operator employee or contractor shall be required to immediately notify the site manager/supervisor (or designated operator representative) of all incidents involving injury or illness to a contractor, damage to operator or contractor equipment as a result of contractor activities at the work site, and any spill, release, or leak. Prompt investigation is required of all injuries, illnesses, equipment or property damage, environmental spills/releases, and other HSE-related incidents.

Unsafe conditions must be immediately reported to the operator. "Near-miss" incidents that could have resulted in injury or damage must be reported by the operator employee or contractor to the site manager/supervisor (or designated operator representative).

4.4.4 Incident Report and Investigation

An initial preliminary written incident report for all workplace incidents shall be submitted within 24 hours of occurrence, with known facts, to the site manager/supervisor (or the designated operator representative).

An investigation will be started as soon as possible following notification into all injuries, illnesses, equipment or property damage, leak, spill or release, or other HSE-related incidents. A written interim incident investigation report for all incidents will be provided every 7 calendar days until the final incident report is submitted to the site manager/supervisor (or the designated operator representative). The operator may participate in any investigation of incidents at any work site and will be permitted to reproduce all work site audits and incident investigations for the purposes of correction, training, investigation, and root cause analysis.

The final incident report shall include, at minimum, description of the incident, location, chronology, injury details, Occupational Health and Safety Administration (OSHA) classification, impact on people and the environment, protective equipment performance assessment, review of the process (design, operation, maintenance, and administrative control), identification of root cause, and recommendation for corrective actions. The operator shall provide timely notification to the site owner of all incidents involving injury or property damage and will provide weekly reports to the site owner that identify all incidents reported in the prior week.

All incident reports that result in formal notification to any government entity or authority shall be provided to the operator. Additionally, any investigations, inspections, or penalties assessed on the contractor by any government entity or authority, relating to or in connection with any work performed for the operator, shall promptly be provided to the operator.

4.4.5 Training

The contractor shall receive training related to health and safety, operational procedures, and emergency response according to the roles and responsibilities of their work assignments. Initial training shall be conducted by, or under the supervision of, an operator site supervisor/manager or an operator-designated representative. Trainers must be thoroughly familiar with the operations plan and ERRP.

The contractor shall conduct a training needs assessment that is representative of the contracted work site assignments. The contractor shall establish the type and frequency of training in a role and responsibility matrix by position (matrix). The contractor shall ensure that personnel have been given all core and special training identified in the matrix.

However, the following are minimum requirements regardless of position or work:

- All newly hired personnel need to attend onboarding training for the work site and fulfill the safety training according to the position before starting on the job.
- All operation employees shall participate in annual training to teach or reinforce how to perform the job, equipment functioning, and instrumentation.
- All employees shall participate in an annual refresher training for the emergency response procedures contained in the ERRP.
- Monthly briefings shall be provided to operations personnel according to their respective responsibilities and shall highlight recent operating incidents, actual experience in operating equipment, and recent storage reservoir monitoring information.
- Documentation of all training shall be retained by the contractor and made available for operator inspection upon request.

4.4.6 Contractor Qualification and Bridging Documents

The contractor shall have a qualification program and auditing process to ensure personnel are held to the same safety standards or higher than operator standards. A bridging document shall be created to align the safety program between operator's and contractor's policies if required.

4.4.7 General Health, Safety, and Welfare

The work site must be maintained so as not to create or otherwise contribute to an unhealthy working or living environment. To accomplish this objective, the operator and contractor shall ensure the following:

Information/Posting/Signs. All emergency, safety and operational information/postings/signs shall be communicated in a format to ensure comprehension by the operator and visitors or contractors on the worksite in accordance with OSHA 29 Code of Federal Regulations (CFR) 1910.145, country, state/province, local, or international equivalent.

Job Safety Analysis. The contractor shall complete and review, with all affected parties, a job safety analysis (JSA) prior to performing any work. Anytime the job scope or conditions change, the contractor shall review and revise (if needed) the JSA with all affected parties.

Prejob Meeting. On work sites where simultaneous operations (SIMOPS) shall be conducted, daily prejob planning meeting(s) shall be held involving representatives from all potentially affected parties.

English Language Proficiency. At least one person per crew or work group assigned to the task must be fully capable of communicating in the English language (both in a verbal and written manner) such that they can perform the work safely. If required, an interpreter shall be provided.

Short Service Or New Hire. Short service personnel or new hires without experience shall be mentored and supervised by a senior professional and uniquely identified in the field (stickers and unique color hard hat). The employee shall fulfill core training before starting activities on the work site. Documentation of such mentoring/training must be retained and available for inspection upon request.

Medical Fitness/Personal Hygiene. Personnel shall be medically fit to safely perform the work they are expected to perform. The operator may audit to ensure that personnel maintain appropriate standards of personal hygiene during performance of the work.

Housekeeping. The contractor shall ensure good housekeeping practices are conducted at the work site by all personnel to provide for a safe and orderly working environment. Aisles, emergency exits, and controls must be always kept free of obstacles.

Machine Guarding. The contractor shall ensure that all equipment machine guarding (permanent, temporary and portable) is properly installed and maintained. Before removing guards to service guarded equipment, which should be isolated, locked out, tagged out, and verified to be nonfunctioning, see lockout/tagout procedure.

Portable Hand Tools. All portable hand tools shall have proper insulation, grounding, and guarding, in accordance with manufacturer requirements. All portable tools shall be properly maintained and used based on manufacturer original design and intended purpose. Tools shall be regularly inspected and damaged or worn tools shall be taken out of service. No homemade or modified hand tools shall be used on the work site.

Management of Change (MOC). The contractor shall have a formal MOC process implemented for all equipment (except for “replacement in kind”), process, and procedural changes. The contractor shall ensure no contractor’s equipment is used or modified outside of the original equipment manufacturer-design specifications.

Clothing and Other Apparel. Ragged or loose clothing and jewelry (rings, watches without breakaway nonmetallic bands, necklaces, exposed piercings, etc.) are not to be worn when on the work site. Any clothing that becomes saturated with hazardous chemicals should be promptly removed.

First Aid/CPR. The contractor shall ensure sufficient First Aid/CPR and defibrillator equipment and trained personnel (National Safety Council, American Heart Association,

Red Cross, etc.) are available at work site in accordance with OSHA 29 CFR 1910.151 or equivalent country, state/province, or local regulations. First Aid/CPR and defibrillator kit(s) containing an appropriate quantity of supplies shall be maintained on location at all times.

Transportation Safety. The contractor shall ensure that all modes of transportation are fit for purpose for travel to/from/within the work site. The contractor shall ensure compliance with all applicable country, state/province, and local regulations.

Industrial Hygiene

- The contractor will assess job duties to determine if hazards are present, or are likely to be present, which necessitate the use of engineering controls, administrative controls, or personal protective equipment (PPE).
- The contractor shall document this hazard assessment through a written certification that identifies the work site evaluated, person certifying that the evaluation has been performed, and date(s) of the hazard assessment. Documentation shall be retained by the contractor and made available to the operator upon request for inspection.
- Based on the results of this hazard assessment, the contractor may be required to perform an industrial hygiene assessment of the work site to determine the level of exposure to hazards (chemicals, lead, dust, noise, etc.).
- Appropriate measures shall be taken based on these assessments in order to safely manage operator, contractor, and visitor exposures.

4.4.8 Personal Protective Equipment

All contractors and visitors must wear appropriate PPE for the hazards present at the work site. Actual PPE requirements shall be determined in accordance with hazard/risk assessments, and safety data sheets (SDSs) must be provided for products that personnel might be exposed to at the work site (“Risk Assessment”).

The following PPE, at a minimum, must be used by all operators or contractors at the work site, along with the appropriate training in the proper use and care of such PPE:

- Hard hats
- Safety glasses with side shields
- Protective footwear (safety-toed boots)
- Personal monitor(s) as needed based on risk assessments for H₂S or other hazardous materials

The following is a list of PPE that, based on the hazard/risk assessment, might be required for the work site and applicable standards/certifications that apply:

- Respiratory protection meeting OSHA 29 CFR 1910.134, National Institute for Occupational Safety and Health (NIOSH)-certified.
- Head protection meeting American National Standards Institute (ANSI) Z89.1 Type 1, Classes E and G.
- Eye and face protection appropriate for the work environment and hazards meeting ANSI Z87.1.

- Foot protection meeting ASTM F 2413 or international equivalent standard.
- Hearing protection meeting ANSI S3.19 standard.
- Hand protection (gloves) appropriate for the work environment, exposure, and hazards.
- Flame-retardant clothing certified to National Fire Protection Association (NFPA) 2112/(NFPA 70E Arc Flash PPE category for personnel performing electrical work) (as identified by regulation or local company management including but not limited to 29 CFR 1910.132, 1910.269, and 1910.335; ASTM 1506; NFPA 70E, 2112, and 2113).

Fire protection. The contractor shall, based on a risk assessment, provide and maintain fire protection equipment for the work. Fire protection shall comply with all local regulatory or equivalent NFPA requirements and be dedicated for firefighting use only.

4.4.9 Hand Safety

The contractors shall have a hand safety awareness-training program targeting topics such as pinch points, hold points, soft grips, cutting devices, proper hand tools, hot/cold conditions, chemical handling, etc.

Selection of appropriate hand protection should be based on an evaluation of the performance characteristics of the hand protection relative to the task(s) to be performed, conditions present, duration of use, and hazards and potential hazards identified.

Contractors are required to use appropriate hand protection when they encounter the following hand hazards:

- Thermal
- Sharp materials
- Electrical current
- Chemical exposure
- Impact
- Abrasive materials

4.4.10 Permitted Work Activities

The following are considered permitted activities and require a permit to be executed:

- **Hot work.** Any work that may introduce any source of ignition where flammable vapors may be present or will generate sufficient heat to ignite combustible and/or flammable materials and these materials will support combustion once ignited.
- **CSE.** Any CSE conducted on operator property must be done under a permit-required confined space program, which shall identify methods to comply with the requirements of OSHA Standard 1910.146.
- **Lockout/Tagout Procedure.** When any hazardous energy scenario is encountered, including but not limited to the following during performance of servicing or maintenance of equipment:

- a. Removal or bypass of machine guards or other safety devices.
- b. Placement or positioning of any part of the body in contact with the point of operation.
- c. Placement or positioning of any part of the body in a danger zone associated with a machine's operating cycle.
- d. When the release of stored energy that could injure the operator, contractor, visitor, or a member of the public if the isolated device (e.g., valve, breaker, etc.) were to be operated by mistake.

The following safe work practices are required:

- a. Use of lockout/tagout controls to prevent the release of hazardous energy.
- b. The equipment must be deenergized, and locks and tags must be applied to the energy-isolating devices.
- c. All work involving isolation of hazardous energy must be done in accordance with 29 CFR 1910.147.

Excavation and Trenching. The contractor performing trenching and excavation activities on a work site must provide competent personnel capable of identifying existing and predictable hazards in the immediate surroundings. The contractor shall ensure that the competent person must be on-site during all excavation activities where the potential for injury exists. The competent person must also comply with all applicable OSHA construction regulations.

Preexcavation Notification Requirements. Injection and plant locations must have a means of receiving a written "ticket locate request" from a state one-call notification center. In addition, each location must have a 24-hour emergency telephone number, such as a plant location or answering service.

Electrical. The contractor performing electrical work activities shall provide qualified personnel. Qualified persons must be trained and knowledgeable of the construction and operations of the equipment or a specific work method and be trained to recognize and avoid the electrical hazards that might be present with respect to that equipment or work method.

Energized equipment to which a qualified or unqualified person might be exposed must be in an electrically safe work condition before an employee works within the limited approach or the arc flash protection boundaries. For cases where it is determined that the equipment cannot be placed in an electrically safe work condition, an energized electrical work permit must be completed and approved prior to commencing the work.

Energized work that is considered routine for diagnostic testing or troubleshooting is exempted from the energized electrical work permit requirements if there is an approved maintenance or operating procedure in place for the task.

Electrical Safety Program. The contractor shall have an electrical safety program that identifies the levels of all electrical and associated tasks to be performed and personnel position qualified to perform each of these tasks in accordance with OSHA/ National Electrical Code (NEC), American

Petroleum Institute (API) 500, NFPA 70E, or equivalent country, state/province, or local regulations.

Contractor electricians shall be qualified to perform electrical activities on contractor or operator equipment at the work site as required by local regulations or equivalent OSHA/NEC/NFPA 70E standards.

Contractors working in areas where there are electrical hazards shall be provided with and use protective equipment that is designed and constructed for the specific part of the body to be protected and work to be performed.

The contractor shall consider all overhead power lines to be energized unless proper measures have been taken for deenergizing. When work is being performed near energized overhead power lines, any part of the crane, boom, mast, gin poles, suspended loads, or machinery shall not be permitted within 10 ft (3 m) of the power lines. However, this safe working distance can be increased according to the voltage of the power lines (OSHA 29 CFR 1926.550, 1910.181, and 1910.269 or equivalent country, state/province, or local regulations).

The contractor shall ensure that all personnel will use only portable ladders, scaffolding, or other elevating devices made of nonconductive material when working around energized electrical equipment.

Precautions shall be taken to ensure that all equipment used is properly grounded and accidental contact with ungrounded electrical sources is prevented.

Contractor shall ensure all contractor electrical components, tools, and PPE are maintained in a safe working condition.

Temporary electrical power setup for the operation of tools and equipment shall be protected by ground fault circuit interrupter (GFCI) circuits.

4.4.11 Chemical, Hazardous, or Flammable Materials

SDSs. The contractor shall ensure that all chemical products/materials supplied to the work site are accompanied by the respective SDS upon delivery. The contractor shall provide the site supervisor/manager with an inventory of all chemical products/materials to be used along with copies of the related SDS documents. The operator shall have authority to prohibit any chemical product/material that is deemed unacceptable at the sole discretion of the operator.

The contractor shall instruct all personnel on the safe use of the chemical products/materials in accordance with an appropriate written hazard communication program as dictated by local/state/federal regulatory requirements.

The contractor shall ensure that SDSs for chemicals are reviewed by personnel prior to exposure.

Storage, Use, and Labeling of Chemicals, and Hazardous/Flammable Materials. The contractor shall ensure all hazardous and/or flammable materials/products are labeled, handled, dispensed and stored in accordance with OSHA 29 CFR 1910.106 and 1910.1200 or equivalent country, state/province, or local regulations.

All chemicals, paints, and hazardous/flammable materials shall be kept in appropriate containers, which are clearly labeled as to the respective contents, and stored in fit-for-purpose storage containers (uniquely identified, vented, etc.). Container labeling shall be consistent with OSHA, U.S. Department of Transportation (DOT), NFPA or equivalent country, state/province, or local regulation.

Hydrogen Sulfide. When the presence of hydrogen sulfide gas may exist at greater than 10 ppm in the wellbore, formation, facilities, or production stream, the contractor is responsible for ensuring that personnel are properly trained and qualified. Personal monitoring equipment shall be used by all personnel, and personal monitoring devices must be set to alarm at 10 ppm so that personnel are alerted to evacuate the area. The H₂S monitors shall be calibrated per manufacturer specifications, and at a minimum, personal H₂S monitors shall be “bump”-tested at least monthly.

4.4.12 Compressed Gas and Air Cylinders

Compressed gas cylinders shall be properly used, maintained, stored, handled, and transported as designated by OSHA 29 CFR 1910.101-106, 1910.252, 1910.253, and 1926.350 or equivalent country, state/province, or local regulations.

Compressed gas and air equipment shall be constructed in accordance with American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section VIII Edition 1968 or equivalent country, state/province, local or international laws or regulations. Equipment includes but is not limited to safety devices, flame arrestors, regulators, pressure gauges, check valves, pressure relief valves, labeling, etc.

All compressed gas cylinders shall be returned promptly to a suitable/designated storage area when not in use. Compressed gas cylinders shall be stored in the upright position and secured.

Protective caps shall be placed over the cylinder valves when not in use or being transported.

Compressed gas cylinders shall be stored away from heat, fire, molten metal, and electrical lines.

Compressed gas cylinders shall not be transported by mobile cranes unless a special carrier is used.

Oxygen and flammable gases shall be stored in areas separated by a minimum of 20 ft or fire barrier rated for 30 minutes.

Acetylene or liquid compressed gas cylinders shall never be used in a horizontal position, as the liquid may be forced out through the hose, causing a fire hazard or explosion.

Oxygen/acetylene cutting torch lines shall include flashback arrestors placed (at least) at the cylinder end. The preference is the arrestor be on the torch side.

Compressed air should not be used for cleaning clothing or parts of the body. If compressed air is used for cleaning, the discharge shall not exceed 30 psi (2.07 bar), and eye/face protection shall be worn.

4.4.13 Overhead/Outside Guarded Area

Lifting and Hoisting. When the contractor is working overhead, the area below shall be barricaded or other equivalent measures taken to protect workers on the work site. No one shall be permitted to pass under any suspended load.

Each lifting device shall identify the manufacturer, safe working load, service/manufactured date, and serial/identification number.

Lifting devices shall be managed in a formal maintenance program (i.e., in-service – out-of-service date, color-coding, rejection criteria, etc.).

Tail chains used on rig floor tuggers, winches, cranes, etc., must be attached to a certified lifting point and cannot be wrapped/choked around the load and/or back onto itself.

Tail chains are prohibited from use in all man-riding operations.

All other application of chains shall be consistent with original equipment manufacturer (OEM) ratings, design, and usage.

Lever-type load binders are prohibited for use on all work sites.

Homemade or modified lifting devices are prohibited for use on all work sites.

Tag lines shall be used when moving or lifting equipment.

Powered Lifting Device Safety. All contractors operating a powered lifting device (forklift, cranes, winches, gin pole trucks, etc.) shall maintain current certification/training in accordance with OSHA regulations or equivalent country, state/province, or local regulations. All powered lifting devices shall have a preuse inspection as required by local regulation or manufacturer recommendation.

Scaffolds or Platforms. All scaffolds or platforms used for installation and maintenance or removal of machinery and equipment shall be erected, maintained, and used in compliance with OSHA or a country, state/province, local, or international equivalent regulation. All scaffolds are to be inspected and tagged by a competent person prior to use and, subsequently, inspected by a competent person prior to each shift.

Safety Harnesses and Lifelines. When working outside of properly guarded work platforms, a full-body safety harness and lifeline, complete with shock-absorbing lanyard(s) or self-retracting lifeline, shall be provided by the contractor and worn by all workers when working above 6 ft (construction) or when walking on working surfaces higher than 4 ft (general industry) without proper guarding. The contractor shall have procedures, trained personnel, and equipment necessary to rescue workers who may be suspended from fall protection equipment following a fall.

4.4.14 Work Site Conduct

Firearms, Weapons, and Non-Work-Related Dangerous Materials. The possession of firearms, weapons, explosives, or non-work-related dangerous materials on work or while conducting work is strictly forbidden.

Drug, Alcohol, and Controlled Substance Requirements. The contractor shall have a written Drug and Alcohol Program that conforms to the Operator's Drug, Alcohol, and Controlled Substances Requirements, of which the contractor confirms receipt and understanding. The contractor shall comply with all governmental requirements, including all applicable federal, state, and local drug- and alcohol-related laws and regulations, including, without limitation, the applicable DOT regulations. The contractor shall have a drug and alcohol policy in place and a functioning drug and alcohol-testing program, which includes provisions for preemployment, postaccident, random, reasonable suspicion, return to duty, and follow-up testing as allowable under local, state, and federal law.

At a minimum, testing requirements and procedures, including testing mechanisms, substances, and cut-off levels, must comply with current DOT guidelines under 49 CFR Part 199 and/or 49 CFR Part 40. The contractor must have a non-DOT drug program. The contractor non-DOT Drug and Alcohol Program shall include preemployment/preaccess screening and drug testing, postincident testing, for-cause/reasonable suspicion testing, and random testing with an annual rate of at least 25% for drugs and 10% for alcohol. No alcoholic beverages are to be consumed on the work site. Any contractor determined to be under the influence of, in possession of, or distributing either drugs or alcohol will be discharged for the remainder of the work.

Smoking and Lighters/Matches. Smoking is not allowed in any facilities or vehicles owned by the operator or within at least 20 ft or more of any facility entrance or exit, windows, or air intake vents. Smoking is not allowed on any roof area. If permitted on the work site, lighters and matches should be stored in safe areas away from flammable or combustible materials. Electronic cigarettes are to be treated in the same manner and shall only be used in designated areas.

Inappropriate Behavior. Inappropriate behavior including, but not limited to, horseplay, practical jokes, offensive remarks, offensive gestures, harassment, etc., is prohibited while performing work or while on the work site. Contractors are expected to discharge any personnel engaged in fighting on the job site for the duration of the work. If any contractor is caught stealing from the operator or other contractors, those personnel are to be discharged and will be prohibited from returning to the work site.

4.5 Well Casing and Cementing Program

Minnkota plans to construct one CO₂ injection well (McCall-1 [proposed]) in the Deadwood Formation and one proposed monitoring well (NRDT-1) through the Deadwood Formation, as designed by OLCV in compliance with Class VI UIC injection well construction requirements. The target horizon for the injection well (McCall-1 [proposed]) is the Deadwood Formation, while the objective of the proposed monitoring well (NRDT-1) is to provide real-time pressure and temperature response from the Deadwood injection well (McCall-1) and Broom Creek injection wells (Liberty-1 (J-ROC1 file no. 37672) and Unity-1 [proposed]) based on actual injection operations.

The following information represents the proposed designs for the CO₂ injection well (McCall-1) (illustrated in Figure 4-12 and detailed in Tables 4-15–4-18) and monitoring well (NRDT-1) (illustrated in Figure 4-13 and detailed in Tables 4-19–4-22).

4.5.1 McCall-1 – Proposed Deadwood CO₂ Injection Well Casing and Cementing Programs

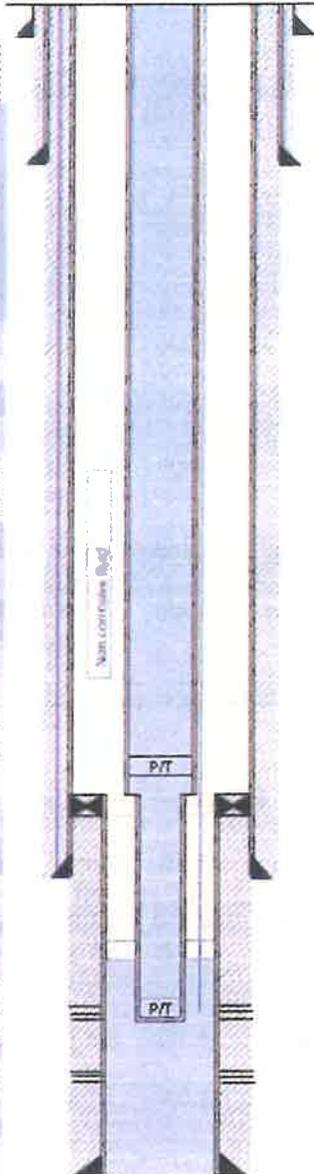
Tables 4-15 through 4-18 provide the casing and cement programs for the proposed Deadwood CO₂ injection well (McCall-1). The well construction materials will comply with NDAC § 43-05-01-11 (Injection Well Construction and Completion Standards).



**McCall-1
(Deadwood Injector)**

NS: 2022 ft / GL: 1997 ft
Latitude / Longitude : 47.0627202 N ; 101.2134405 W

Temp 90 F / Max Pressure 2000psi
Injection Rate 0.7-1.5 Mton/ds



Conductor 20" @ 100 ft.

Surface Design:

Open Hole Log: Resistivity, GF, SP, Caliper, Temperature
Cased Hole: CBL/VDL

Surface Hole 17 1/2" @ 2000 ft
Surface Cas: 13 3/8" 54.5 # K-95 BTC @ 2000 ft
Fresh Gel Mud - MW 8.5-9.5 ppg
KF 20 bis
FTF 12.5 ppg
Class G Cement - Additive surface to TD

Intermediate String Design:

Open Hole Log: Triple Combo (Induction Resistivity, Density, Neutron, SP)
Spectral GF
FMS
Dipole Sonic
4 arm Caliper
Temperature Log

Cased Hole: CBL-VDL / Ultrasonic Cement Log
Cased Hole: Temperature log calibration DTS
Fiber Optic DTS casing deployed

Pressure Data:

Inyan Kara PP 0.415 psi/ft / FG 0.721 psi/ft
Broom Creek PP 0.431 psi/ft / FG 0.731 psi/ft
Deadwood PP 0.461 psi/ft / FG 0.75 psi/ft

Intermediate Hole 12.25" @ 7800 ft (TVD)
Casing 9 5/8" 47 # L80 Premium Conn @ 3400 ft
Cement 2 stages - DV tool 3400 ft
Casing 9 5/8" 47 # L80 Premium Conn @ 4200 ft
Casing 9 5/8" 47 # L90-CP13 Premium Conn @ 4200 to 6000 ft
Casing 9 5/8" 47 # L90 Premium Conn @ 6000-7800 ft
Water Based Inhibited Mud - MW 9.7-10.2 ppg
BHT 160 F
Class G Cement - Surface to 3400 ft
CO2 Resistant cement - 3400 ft to 7800 ft (TVD)

Long String Design:

Black Island Perf

Deadwood C Member Perf

TOL 7" @ 7300 ft
Water Based Inhibited Mud - MW 9.5-9.8 ppg
Injection Zone Hole 8.5" @ 10000 ft
Liner 7" 29 ppi C35 CR13 Premium Conn @ 10000 ft
CO2 resistant cement 7300-10000 ft

Figure 4-12. Proposed design of the McCall-1 Deadwood CO₂ injection wellbore schematic.

Table 4-15. McCall-1 Proposed Deadwood CO₂ Injection Well Information

Well Name:	McCall-1	NDIC No.:	TBD	API No.:	TBD
County:	Oliver County	State:	ND	Operator:	Minnkota Power Cooperative, Inc.
Location:	Section 4, T141N R83W	Footages:	TBD	Total Depth:	10,000' MD

Table 4-16. McCall-1 Proposed Deadwood CO₂ Injection Well Casing Program

Section	Hole Size, in.	Casing OD, in.	Weight, lb/ft	Casing Seat	Casing Seat Measured Depth, ft	Grade, Connection*	Objective
Conductor	30	20	52.73	Surface formation	100	B, WELD-API 5L Specs	Prevent shallow groundwater and protect loose sediment near surface formations
Surface	17.50	13.375	54.5	Pierre	2,000	K-55, BTC	Cover shallow freshwater aquifers
Intermediate-1	12.25	9.625	47.0	Swift	4,200	L-80, premium	Cover shale formations
Intermediate-2	12.25	9.625	47.0	Mission Canyon State A	6,000	13CR-80, premium	Protect high-permeable formations with CO ₂ -resistant casing
Intermediate-1	12.25	9.625	47.0	Dawson Bay	7,800	L-80, premium	Cover shale formations
Production	8.50	7.00	29.0	Precambrian	10,000	13CR-C95, premium	Protect sandstone formations with CO ₂ -resistant casing

* BTC: buttress-thread and coupled, premium connection: gas-tight thread and coupled: vendor to be determined.

Table 4-17. McCall-1 Proposed Deadwood CO₂ Injection Well Casing Properties

Casing Description	Hole, in.	Depths ft	ID, in.	Drift, in.	Burst, psi	Collapse, psi	Tension, Klb	OD Thread, in.
13.375" 54.5# K55 BTC	17.5	0-2,000	12.615	12.459	2,730	1,130	766	14.375
9.625" 47# L80 Premium Conn.	12.25	0-4,200	8.681	8.525	6,870	4,750	1,086	10.625
9.625" 47# L80 13Cr Premium Conn.	12.25	4,200-6,000	8.681	8.525	6,870	4,750	1,086	10.625
9.625" 47# L80 Premium Conn.	12.25	6,000-7,800	8.681	8.525	6,870	4,750	1,086	10.625
7" 29# C95 13Cr Premium Conn.	8.5	7,300-10,000	6.184	6.059	9,690	7,840	803	7.656

Table 4-18. McCall-1 Proposed Deadwood CO₂ Injection Well Cement Program

Section	Type	Depths (ft)	Density	Sx	Min. Excess	Cap	Vol	Yield
17.5" Hole	Class G cement with additives	0–1,500	12.5	822	50%	0.1237219	278	1.90
	Class G cement with additives	1,500–2,000	15.8	449	50%	0.1237219	93	1.16
12¼" Hole	Class G cement with additives	0–2,900	11.8–12.5	615	20%	0.0557819	194	1.77
	Class G cement with additives	2,900–3,400	14.8	164	20%	0.0557819	33	1.15
	DV tool @ 3,400 ft CO ₂ -resistant cement	3,400–7,800	14.8	134 3	20%	0.0557819	295	1.23
8½" Hole	CO ₂ -resistant cement	7,300–10,000	14.8	334	20%	0.022586	73	1.23

Note: Evaluate well condition to increase cement excess in case of losses. Centralization target 90%.

4.5.2 NRDT-1 – Proposed Deadwood CO₂-Monitoring Well Casing and Cementing Programs
 The proposed design of the Deadwood CO₂-monitoring well (NRDT-1) is provided below in Figure 4-13.

Tables 4-19 through 4-22 provide the casing and cement programs for the proposed Deadwood CO₂-monitoring well (NRDT-1). The well construction materials will comply with NDAC § 43-05-01-11 (Injection Well Construction and Completion Standards).



**NRDT-1
Monitor Well
Broom Creek / Deadwood**

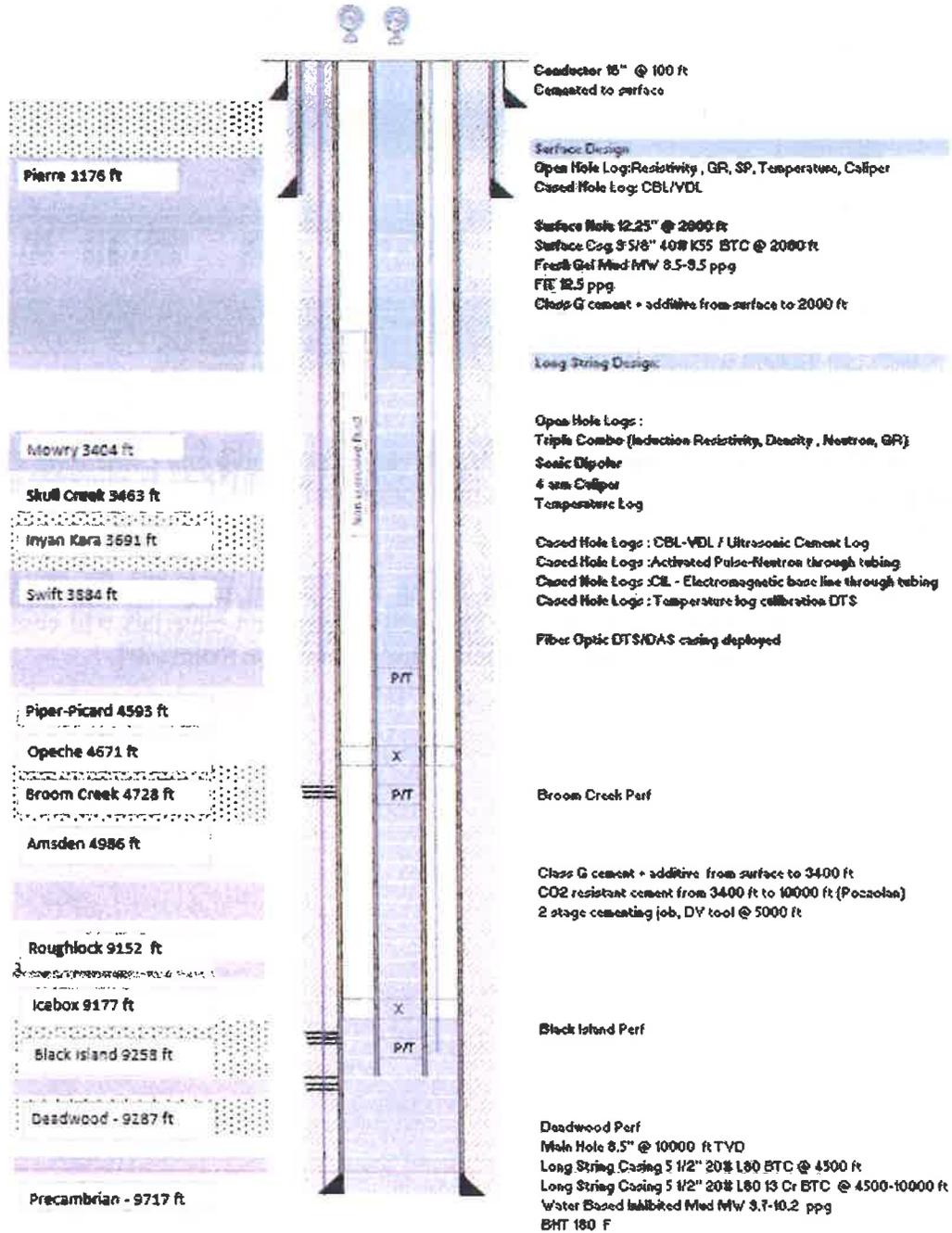


Figure 4-13. NRDT-1 proposed design of the Deadwood CO₂-monitoring wellbore schematic.

Table 4-19. NRDT-1 Proposed Deadwood CO₂-Monitoring Well Information

Well Name:	NRDT-1	NDIC No.:	-	API No.:	-
County:	Oliver County	State:	ND	Operator:	Minnkota Power Cooperative
Location:	-	Footages:	-	Total Depth:	10,000'

Table 4-20. NRDT-1 Proposed Deadwood CO₂-Monitoring Well Casing Program

Section	Hole Size, in.	Casing OD, in.	Weight, lb/ft	Grade	Connection	Top Depth, ft	Bottom Depth, ft	Objective
Surface	12¼	9¾	40.0	K-55	BTC	0	2,000	Protect shallow freshwater aquifers
Long-String	8½	5½	20.0	L-80	BTC	0	4,500	Protect low-permeable formations
Long-String	8½	5½	20.0	13CR-80	BTC	4,500	10,000	Protect high-permeable formations

Table 4-21. NRDT-1 Proposed Deadwood CO₂-Monitoring Well Casing Properties

Casing Description	Hole in.	Depths ft	Casing		Grade	ID in.	Drift in.	Burst psi	Collapse psi	Tension Klb	Thread	OD Thread
			OD in.	Weight lb/ft								
9.625 in. 40 ppf K55 BTC	12.25	0-2,000	9.625	40	K55	8.835	8.679	3,950	2,570	630	BTC	10.625
5.5 in. 20 ppf L80 BTC	8.5	0-4,500	5.5	20	L80	4.778	4.653	9,190	8,830	466	BTC	6.05
5.5 in. 20 ppf L80 13Cr BTC	8.5	4,500-10,000	5.5	20	L80 13Cr	4.778	4.653	9,190	8,830	466	BTC	6.05

Table 4-22. NRDT-1 Proposed Deadwood CO₂-Monitoring Well Cement Program

Section	Hole Size, in.	Type	Depth, ft	Density, ppg	Sacks of Cement	Excess	Vol, bbl	Yield, ft ³ /sk
Surface	12.25	Class G cement with additives	0–1,500	12.5	370	50%	126	1.90
		Class G cement with additives	1,500–2,000	15.8	202	50%	42	1.16
Long-String	8.5	Class G cement with additives	0–3,400	11.8–12	528	20%	166	1.77
		CO ₂ -resistant cement	3,400–5,000	14.8	357	20%	78	1.23
		DV tool @ 5,000 ft						
		Class G cement with additives	5,000–8,500	11.8–12	543	20%	171	1.77
		CO ₂ -resistant cement	8,500–10,000	14.8	335	20%	73	1.23

4.6 Well P&A Program

Upon end of life for the McCall-1 (proposed) CO₂ injection well or completion of the project, Minnkota plans to P&A the CO₂ injection well (McCall-1 [proposed]) in the Deadwood Formation and one proposed monitoring well (NRDT-1) through the Deadwood Formation, designed by OLCV according to NDAC 43-05-01-11.5. The plugging procedure and materials will be designed to prevent any unwanted fluid movement, resist the corrosive aspects of CO₂ with water mixtures, and protect any USDWs. Table 4-23 provides the cement program for plugging the proposed Deadwood CO₂ injection well, McCall-1. Figure 4-14 is the schematic.

The injection zone, the Black Island/Deadwood Formation, and overlying seal will be isolated from upper zones and USDWs with CO₂-resistant cement. An external mechanical integrity log will be performed before plugging. In addition, the well will be flushed with brine to force CO₂ into the formation.

4.6.1 McCall-1 Deadwood CO₂ Injection Well P&A

1. After injection has ceased, the well will be flushed with a kill fluid. A minimum of three tubing volumes will be injected without exceeding fracture pressure.
2. Bottomhole pressure measurements will be taken using the installed downhole gauges. In the case where the gauges are not functional, the operator will run pressure gauges during the P&A process of the well.
3. An active pulse neutron log will be run, and the well will be pressure-tested to ensure integrity both inside and outside of the casing prior to plugging. Production logging tools (PLTs), tracers, noise, or temperature logs could be run in substitution.
4. If a loss of mechanical integrity is discovered, the well will be repaired prior to proceeding further with the plugging operations.

5. All casing in this well will have been cemented to surface at the time of construction and will not be retrievable at abandonment.
6. After injection is terminated permanently, the injection tubing and packer will be removed.
7. Then the balanced-plug placement method will be used to plug the well. A cement retainer will be used to isolate the perforation section to avoid flowback of formation fluids that could contaminate the plug.

Contingency: If, after flushing, the tubing and packer cannot be released, an electric line with tubing cutter will be used to cut off the tubing above the packer and packer will be left in the well. The cement retainer method will be used for plugging the injection formation below the abandoned packer.

8. All casing strings will be cut off at least 5' below the surface and plow line.
9. A blanking plate with the required permit information will be welded on top of the cutoff casing.

Table 4-23. McCall-1 Proposed Deadwood CO₂ Injection Well Plug and Abandonment Cement Plug Program

Description/Plug No.	1	2	3	4	5	6
Placement Method	Squeeze			Balance plug mix and pump		
Slurry Density	15.8	15.8	15.8	15.8	15.8	15.8
Type of Slurry	CO ₂ -resistant			Class G + additive		
ID, in.	6.184	8.681	8.681	8.681	8.681	8.681
Slurry volume, bbl	50	24	56	48	42	5
Sacks of Cement by Plug	252	121	283	242	203	25
Plug Top, feet	9,100	7,000	4,500	3,300	1,700	0
Plug Bottom, feet	9,700	7,300	5,200	3,900	2,200	60

4.6.1.1 McCall-1 Injection Well-Plugging Schematic

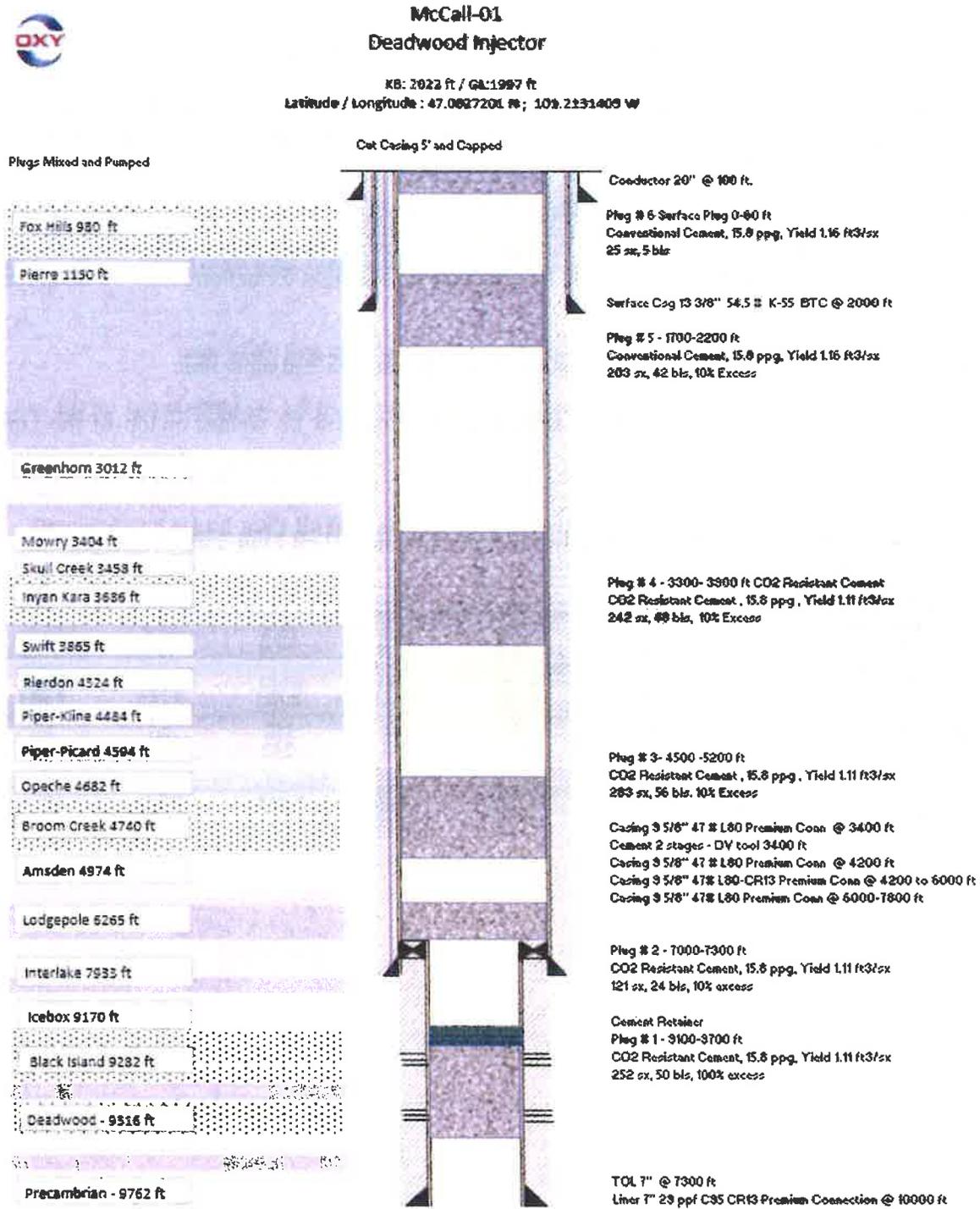


Figure 4-14. Proposed design of the Deadwood CO₂ injection well, McCall-1, P&A wellbore schematic.

4.6.1.2 Tentative Plugging Procedures

1. Move in (MI) rig onto McCall-1 well and rig up (RU). All CO₂ pipelines will be marked and noted with rig supervisor prior to MI.
2. Conduct and document a safety meeting.
3. Record bottomhole pressure from downhole gauge and calculate the kill fluid density.
4. Test the pump and line to 5,000 psi. Fill the tubing with kill fluid (determined by the bottomhole pressure measurement). Bleeding off occasionally may be necessary to remove all air from the system. Monitor tubing pressure.
5. Test casing annulus to 1,500 psi, or NDIC approved test pressure, and monitor it for 30 minutes. If the pressure decreases more than 10% in 30 minutes, bleed pressure, check surface lines and connections, and repeat test. Release pressure.

Note: If failure in long-string casing is identified, the operator will prepare a plan to repair the well prior to the P&A.

6. If both casing and tubing are dead, then nipple up blowout preventers (NU BOPs).

Contingency: If the well is not dead or pressure cannot be bled off tubing, RU slickline, and set plug in lower-profile nipple below the packer. Circulate tubing and annulus with kill weight fluid until the well is dead. After the well is dead, nipple down tree, NU BOPs, and perform a function test. Prepare to recover packer with work string.

7. Pull out of hole and lay down tubing, packer, cable, and sensors.

Contingency: If unable to release tubing and retrieve packer, RU electric line, and make a cut on the tubing string just above packer. Make a cut above the packer at least 5 to 10 ft MD. Then pull the work string out of the hole and proceed to the next step. If problems are noted, update cement remediation plan. The cement retainer might be used to force out cement in case the packer cannot be removed.

8. Pick up work string, and trip in hole (TIH) with bit to condition wellbore.
9. Pull out of the hole, and RU logging unit. Confirm external mechanical integrity by running one of the tests listed as options. Rig down logging truck.
 - a. Activate neutron log
 - b. Noise log
 - c. PLT
 - d. Tracers
 - e. Temperature log

10. TIH work string with cement retainer to the top of Plug 1. Circulate well, set retainer, and perform injectivity test. RU equipment for cementing operations.
11. Mix and pump CO₂-resistant slurry to cover the Black Island/Deadwood Formations and isolate them from the upper formations. Disconnect from retainer, and check flow. Circulate.
12. Move work string to 7,300 ft, set balanced plug with CO₂-resistant slurry 15.8 ppg to the top of the 7-in. liner.
13. Pull work string to 5,200 ft. Set balance plug with CO₂-resistant slurry 15.8 ppg to isolate Broom Creek Formation from the Dakota Group.
14. Pull out to 300 ft above the plug and circulate. Wait on cement. Run in the hole and tag cement to validate top.
15. Pull work string to 3,900 ft and circulate. Set balanced plug with CO₂-resistant slurry 15.8 ppg to cover the Dakota Group and isolate it from the USDW, Fox Hills. Pull 300 ft above the plug. Wait on cement. Run in the hole and tag plug.
16. Set balanced plug with Class G cement + additive 15.8 ppg to cover the shoe of the surface casing. Pull out above the plug and circulate.
17. Set surface plug with Class G cement + additive, 15.8 ppg to isolate the top of surface casing.
18. Lay down all the work string. Rig down all equipment and move out. Cut the casing at 5 ft below the ground. Clean cellar to where a plate can be welded with well information.
19. The procedures described above are subject to modification during execution as necessary to ensure a successful plugging operation. Any significant modifications due to unforeseen circumstances will be described in the plugging report.

4.6.2 NRDT-1 Deadwood Monitor Well P&A

Upon completion of the project, as part of the closure plan of the facilities, the well will be plugged and abandoned according to NDAC § 43-05-01-11.5. The plugging procedure and materials will be designed to prevent any unwanted fluid movement, resist the corrosive aspects of CO₂ with water mixtures, and protect any USDWs.

NRDT-1 is located at the border of the projected CO₂ plume, which will minimize the probability that the CO₂ mixed with formation fluids will cause damage to the cement or proposed tubulars. The plugs are designed to isolate the Black Island/Deadwood perforations from the Broom Creek section and overlying seal until the USDW. An external mechanical integrity log will be performed before plugging. In addition, the well will be flushed with brine to force any formation fluid back into the reservoir.

Table 4-24 provides the plugging cement program for the proposed NRDT-1 Deadwood CO₂-monitoring well. Figure 4-15 shows the proposed schematic.

Table 4-24. NRDT-1 Proposed Deadwood CO₂-Monitoring Well Plug and Abandonment Cement Plug Program

Description/Plug No.	1	2	3	4	5
Placement Method	Squeeze	Squeeze	Balanced Plug	Balanced Plug	Balanced Plug
Slurry Density	15.8	15.8	15.8	15.8	15.8
Type of Slurry	-----CO ₂ -resistant-----			Class G + additive	
ID, in.	4.653	4.653	4.653	4.653	4.653
Slurry Volume, bbl	19	13	14	12	4
Sacks of Cement by Plug	96	64	70	56	18
Plug Top, ft	9,100	4,600	3,300	1,700	0
Plug Bottom, ft	9,700	5,000	3,900	2,200	160

4.6.2.1 NRDT-1 Monitor Well-Plugging Schematic



**NRDT-1
Monitor Well**

Plugs Mixed and Pumped

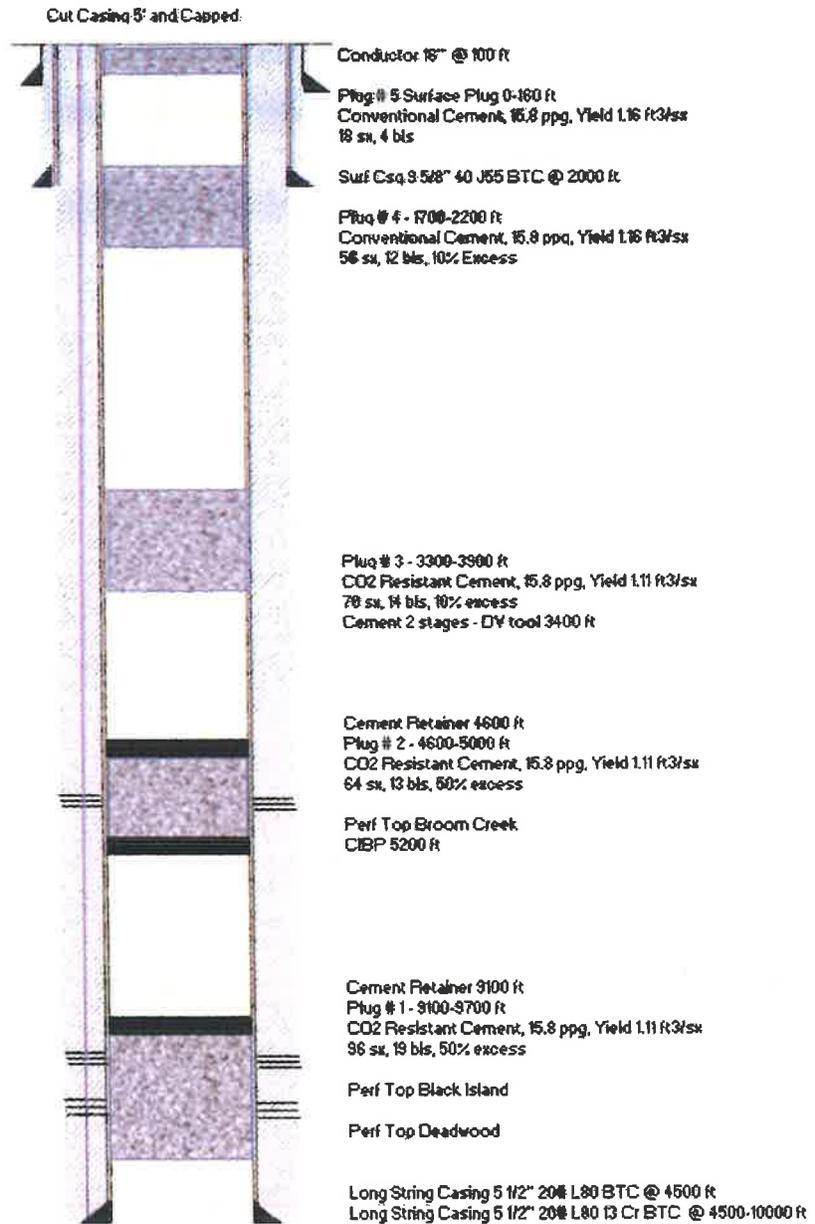


Figure 4-15. NRDT-1 proposed design of the CO₂ monitor well P&A wellbore schematic.

4.6.2.2 Tentative Plugging Procedures

1. Move-in (MI) rig onto NRDT-1 well and rig-up (RU).
2. Conduct and document a safety meeting.
3. Test the pump and line to 5,000 psi. Fill tubing with kill fluid. Bleeding off the system occasionally may be necessary to remove all the air. Monitor tubing pressure.
4. Test casing annulus to 1,500 psi, or approved NDIC pressure, and monitor it for 30 minutes. If the pressure decreases more than 10% in 30 minutes, bleed pressure, check surface lines and connections, and repeat test. Release pressure.

Note: If failure in the long string casing is identified, the operator will prepare a plan to repair the well prior to the plug and abandonment.

5. If both casing and tubing are dead, then NU BOPs.

Contingency: If the well is not dead or pressure cannot be bled off the tubing, RU slickline and set plug in the lower profile nipple below first packer. Circulate tubing and annulus with kill weight fluid until the well is dead. Then nipple down tree, NU BOPs, and perform a function test. Prepare to recover packer with work string.

6. Pull out of hole and lay down tubing, packer, cable, and sensors.

Contingency: If unable to release tubing and retrieve packers due to:

- a) **Top Packer Stuck:** Prepare plan to cut tubing above the top packer, 5 to 10 ft of MD. Mill/wash over the seals and OD of the top packer to release the string, until the bottom packer. Run fishing equipment and work fish out.
- b) **Bottom Packer Stuck:** If bottom packer is stuck, proceed to RU electric line and make cut on tubing string just above bottom packer pull the work string out of hole and proceed to next step. If problems are noted, update cement remediation plan.

7. Pick up work string, and TIH with bit to condition wellbore.
8. Pull out of the hole, and RU logging unit. Confirm external mechanical integrity by running one of the tests listed as options. Rig down logging truck.
 - a. Activate neutron log
 - b. Noise log
 - c. PLT
 - d. Tracers
 - e. Temperature log

9. TIH with work string and cement retainer to the top of Plug 1. Circulate well, set retainer, and perform injectivity test. RU equipment for cementing operations.
10. Mix and pump CO₂-resistant slurry to cover the Black Island/Deadwood Formations and isolate them from the upper formations. Disconnect from retainer and check flow. Circulate.
11. Pull work string out of the hole.
12. Run CIBP 50 ft below the perf in Broom Creek ~5,000 ft.
13. TIH work string with work string and cement retainer to the top of Plug 2. Circulate well, set retainer and perform injectivity test. RU equipment for cementing operations.
14. Mix and pump CO₂ resistant slurry 15.8 ppg to isolate the Broom Creek Formation From the Dakota Group. Disconnect from retainer and check flow. Circulate.
15. Pull work string to 3,900 ft. Circulate. Set balanced plug, CO₂ resistant slurry 15.8 ppg to cover Dakota Group and isolate it from USDW Fox Hills. Pull 300 ft above the plug. Wait on cement. Run in the hole and tag plug.
16. Set balanced plug with Class G cement + additive 15.8 ppg to cover the shoe of the surface casing. Pull out above the plug and circulate.
17. Set surface plug with Class G cement + additive, 15.8 ppg to isolate the top of surface casing.
18. Lay down all work string. Rig down all equipment and move out. Cut the casing at 5 ft below surface. Clean cellar to where a plate can be welded with well information.
19. The procedures described above are subject to modification during execution as necessary to ensure a successful plugging operation. Any significant modifications due to unforeseen circumstances will be described in the plugging report.

4.7 Postinjection Site and Facility Closure Plan

The PISC and facility closure plan describes the activities that Minnkota will perform following the cessation of CO₂ injection to achieve final closure of the site. A primary component of this plan is a postinjection monitoring program that will provide evidence that the injected CO₂ plume is stable; i.e., CO₂ migration will be unlikely to move beyond the boundary of the storage facility area. The monitoring locations, methods, and schedule are designed to show the position of the CO₂ plume and demonstrate that the CO₂ injected is within the storage reservoir and there is no endangerment to USDWs.

Based on the current simulations of the CO₂ plume movement following the cessation of CO₂ injection, it is projected that the CO₂ plume will stabilize within the storage facility area boundary (see Appendix A), ensuring the safety of USDWs within the AOR. Based on these observations, a minimum postinjection monitoring period of 10 years is planned to confirm these current predictions of the CO₂ plume extent and postinjection stabilization. However, monitoring

will be extended beyond 10 years if it is determined that additional data are required to demonstrate a stable CO₂ plume and safety of USDWs. The nature and duration of that extension will be determined based upon an update of this plan and NDIC approval.

In addition to executing the postinjection monitoring program, the Class VI injection and monitoring wells will be plugged, as described in the plugging plan of this permit application (Section 4.6). All surface equipment not associated with long-term monitoring will be removed, and the surface land of the site will be reclaimed to as close as practical to its original condition. Lastly, following the plume stability demonstration, a final assessment will be prepared to document the status of the site and submitted as part of a site closure report.

4.7.1 Predicted Postinjection Subsurface Conditions

4.7.1.1 Pre- and Postinjection Pressure Differential

Model simulations were performed to estimate the change in pressure in the Deadwood Formation during and after the cessation of CO₂ injection. The simulations were conducted for 20 years of CO₂ injection at a rate of 1.17 MMt per year, followed by a postinjection period of 10 years.

Figure 4-16 shows the predicted pressure differential at the conclusion of 20 years of CO₂ injection. As shown, at the time that CO₂ injection operations have stopped, the model predicts an increase in the pressure of the reservoir, with a maximum pressure differential of 0 to 164.33 psi at the location of the injection well. It is important to note that this maximum pressure increase is not sufficient to move formation fluids from the storage reservoir to the deepest USDW. The details of this pressure evaluation are provided as part of the AOR delineation of this permit application (see Appendix A).

A description of the predicted decrease in this pressure profile of the Deadwood Formation over the 10-year postinjection period is provided in Figure 4-17. As expected, the pressure in the reservoir gradually decreases over time following the cessation of CO₂ injection, with the pressure at the injection well after 10 years of postinjection predicted to decrease 414.3 to 1,318.18 psi compared to the pressure at the time CO₂ injection was terminated. This trend of decreasing pressure in the storage reservoir is anticipated to continue over time until the pressure of the storage reservoir approaches the original storage reservoir pressure conditions prior to any CO₂ injection activities.

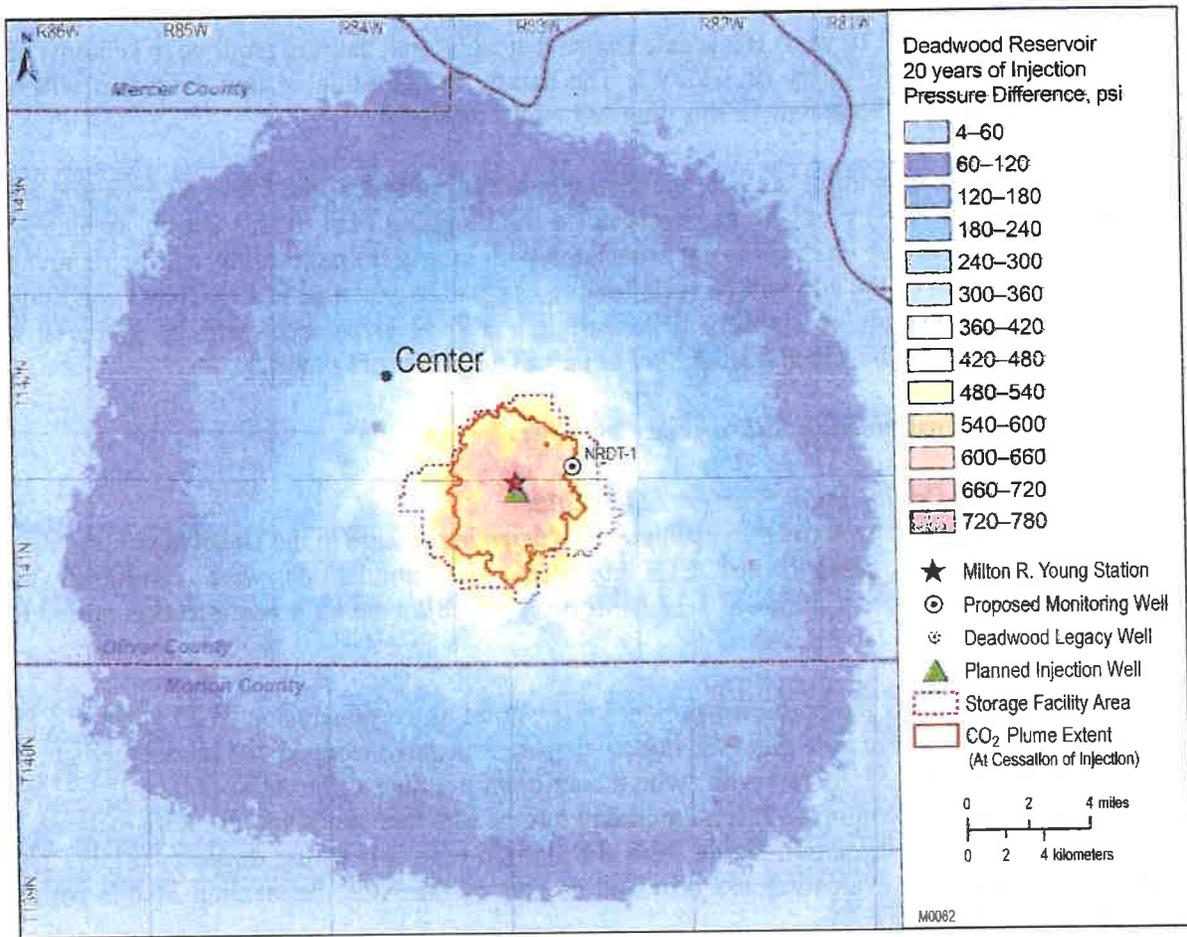


Figure 4-16. Predicted pressure increase in storage reservoir following 20 years of injection of 1.17 MMt per year of CO₂.

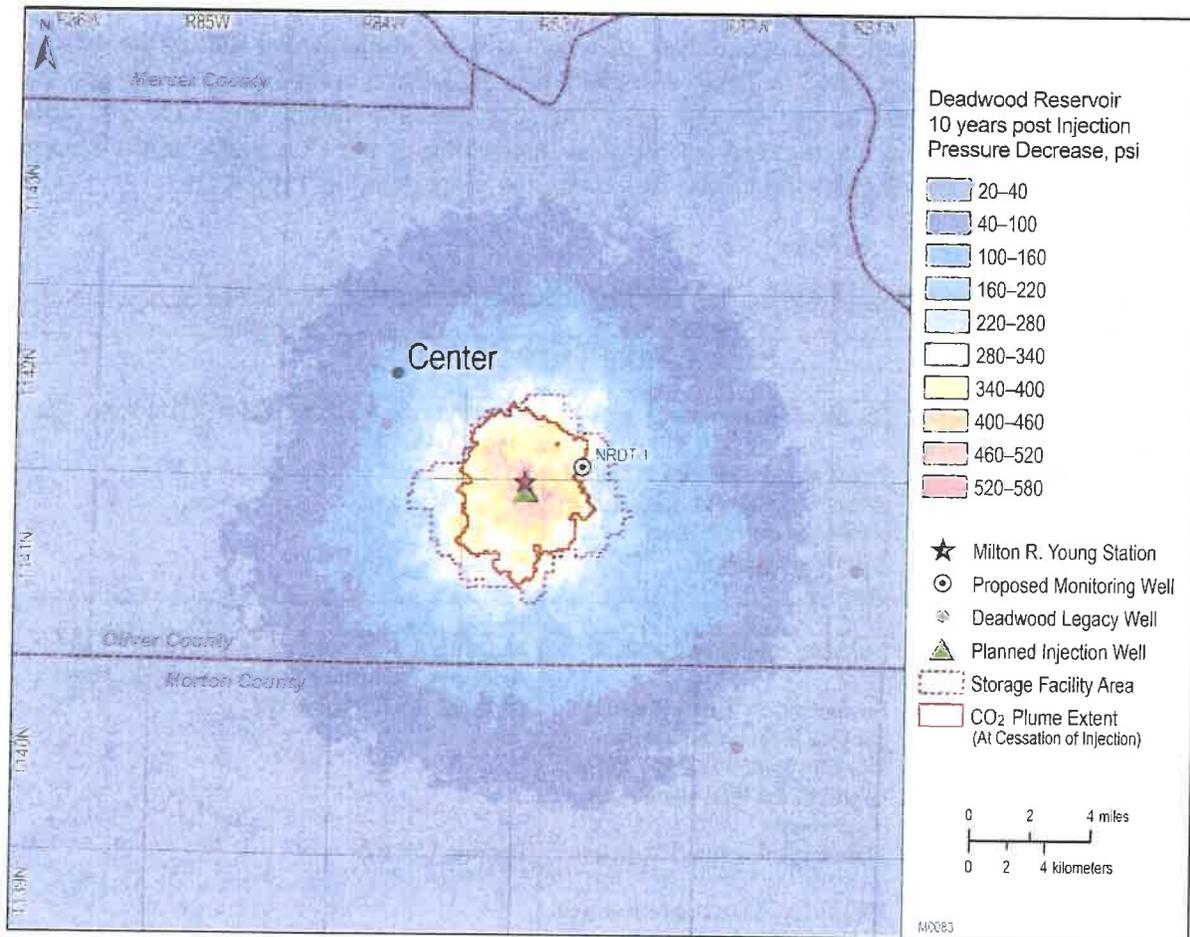


Figure 4-17. Predicted decrease in pressure in the storage reservoir over a 10-year period following the cessation of CO₂ injection.

4.7.1.2 Predicted Extent of CO₂ Plume

Also shown in Figures 4-16 and 4-17 are numerical simulation predictions of the extent of the CO₂ plume at the time CO₂ injection was terminated (i.e., after 20 years of injection) and following the planned 10-year PISC period, respectively. The results of these simulations predict that 99.0% of the separate-phase CO₂ mass would be contained within an area of 20 mi² at the end of CO₂ injection (see Figure 4-16). As shown in Figure 4-17, the areal extent of the CO₂ plume is not predicted to change substantially over the planned 10-year PISC period.

Additional simulations beyond the 10-year PISC period were also performed and predict that at no time will the boundary of the stabilized plume at the site, which is shown on both Figures 4-16 and 4-17, extend beyond the boundary of the storage facility area. If such a determination can be made following the planned 10-year postinjection period, the CO₂ plume will meet the definition of stabilization as presented in NDCC § 38-22-17(5d) and qualify the geologic storage site for receipt of a certificate of project completion.

4.7.1.3 *Postinjection Monitoring Plan*

A summary of the postinjection monitoring plan that will be implemented during the 10-year postinjection period is provided in Table 4-25. The plan includes a combination of soil gas and groundwater/USDW monitoring, storage reservoir pressure/temperature and CO₂ saturation monitoring, well integrity testing, and geophysical monitoring of the CO₂ plume in the storage reservoir. Each of these monitoring efforts is described in more detail in Table 4-25.

Table 4-25. Summary of 10-year Postinjection Site Care-Monitoring Program

Type of Monitoring	Frequency	Comments
Near-Surface Monitoring		
Soil Monitoring		
Soil Gas Profile Stations (Soil Gas Location – see Figure 4-18)	Duration: minimum 10 years. Frequency: 3–4 seasonal sample events at soil gas profile stations performed every 3 years following cessation of CO ₂ injection.	Located at the McCall-1 and NRDT-1 wells. See Figure 4-18.
Water Monitoring		
Groundwater Wells	Duration: minimum 10 years. Frequency: 3–4 sample events per year at the cessation of injection and 3–4 sample events as part of the final site closure assessment.	Sampling will be performed on all active and accessible freshwater groundwater wells within the AOR (see Figure 4-18).
Fox Hills Formation	Duration: minimum 10 years. Frequency: 3–4 sample events at cessation of injection and 3–4 sample events as part of the final site closure assessment.	Deepest USDW.
Storage Reservoir Monitoring		
Injection Well (McCall-1)	Monitor fluid levels until well is plugged.	Minnkota plans to P&A injection well (McCall-1) at cessation of injection operations.
Downhole Pressure and Temperature Monitoring (NRDT-1)		
Distributed Fiber Optic Temperature (DTS)	Continuous.	DTS fiber will give continuous temperature profile for monitoring well NRDT-1 from the base of fiber to the surface until plume stabilization.
Pressure and Temperature Gauges in NRDT-1	Bimonthly.	Gauges provide continuous temperature and pressure monitoring of the injection zone (Deadwood) until plume stabilization. Monitoring will continue as part of the PISC and facility closure plan.
Wireline Logging and Retrievable Monitoring (NRDT-1)		
PNL (McCall-1 and NRDT-1)	NRDT-1 at cessation of injection and once every 5 years thereafter until plume stabilization is demonstrated.	Log McCall-1 and NRDT-1 wells at cessation of injection.

Continued . . .

Table 4-25. Summary of 10-year Postinjection Site Care Monitoring Program (continued)

Type of Monitoring	Frequency	Comments
Well Integrity Test		
External Mechanical Integrity: USIT or Electromagnetic Casing Inspection Tool	Duration: minimum 10 years postinjection. Frequency: Perform during well workovers but not more frequently than once every 5 years in NRDT-1.	Annually until the injection well is P&A.
External Mechanical Integrity: Downhole Temperature	Annual temperature logging in NRDT-1 (if fiber fails) until plume stabilization.	
DTS	Continuous.	Continuous DTS monitoring in NRDT-1 until P&A. DTS fiber provides continuous temperature profile from the base of fiber to the surface until plume stabilization.
Pressure Fall-Off Test (Injection Zone)	Prior to P&A.	
Geophysical Monitoring		
Time-Lapse Seismic	Perform 2D and/or 3D seismic surveys at the cessation of CO ₂ injection and every 5 years during the postinjection period.	Time-lapse seismic surveys will continue as part of the 10-year postinjection period to support a stabilization assessment of the CO ₂ plume.
InSAR	To be determined.	To be determined – continuous monitoring of ground elevation based on relative storage deformation with InSAR until storage facility achieves stabilization.

4.7.2 Groundwater and Soil Gas Monitoring

Two soil gas profile stations, two Fox Hills Formation (i.e., deepest USDW) monitoring wells, and various groundwater wells, that were identified and sampled during the operations phase of the project, will be sampled during the proposed 10-year PISC period. Figure 4-18 identifies the location of the soil gas profile stations, Fox Hills Formation monitoring wells, and groundwater monitoring wells that will be included in this monitoring effort. It is proposed that these samples will be analyzed for the same list of parameters as described in the testing and monitoring plan (Section 4.4 of this permit application); however, it is anticipated that the final target list of analytical parameters will likely be reduced for the PISC period based upon an evaluation of the monitoring results that are generated during the 20-year injection period of the storage operations.

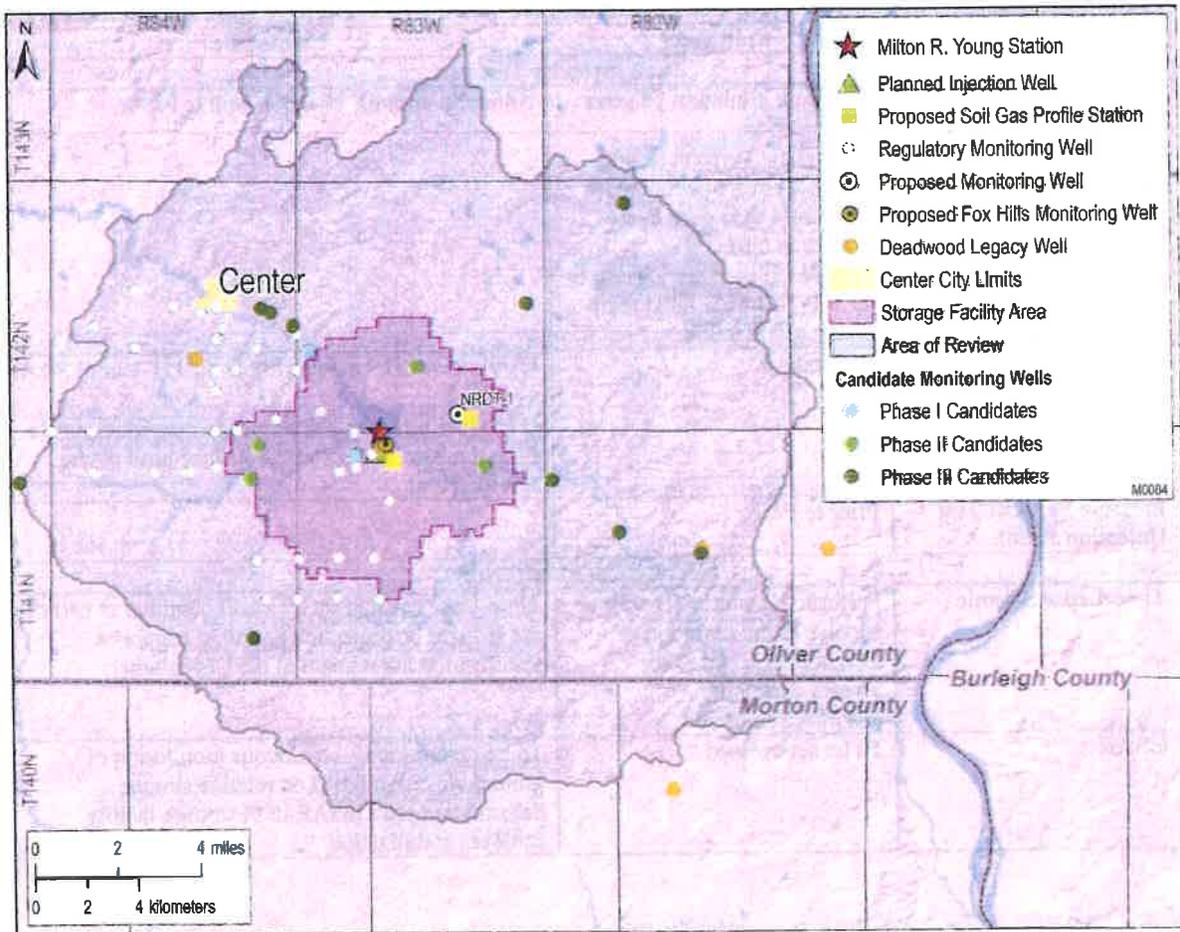


Figure 4-18. Location of soil gas and groundwater well sampling locations included in the PISC monitoring program.

4.7.3 Monitoring of CO₂ Plume and Pressure Front

Monitoring of the CO₂ plume location and storage reservoir pressure will be conducted during the PISC period using the methods summarized in Table 4-25, which are also discussed in more detail in the testing and monitoring plan of this permit application (Section 4.4). Monitoring methods include a combination of formation-monitoring methods (e.g., downhole pressure, temperature, mechanical integrity tests, PNLs, and capture/reservoir saturation tool logs) and geophysical monitoring techniques (i.e., surface 3D seismic monitor [4D seismic]) that monitor CO₂ saturation. Figure 4-19 provides an aerial view of the extents of both the existing 3D seismic surveys and potential borehole seismic (or VSP) surveys as compared to the predicted areal extents of the CO₂ plume at the cessation of injection and stabilized plume.

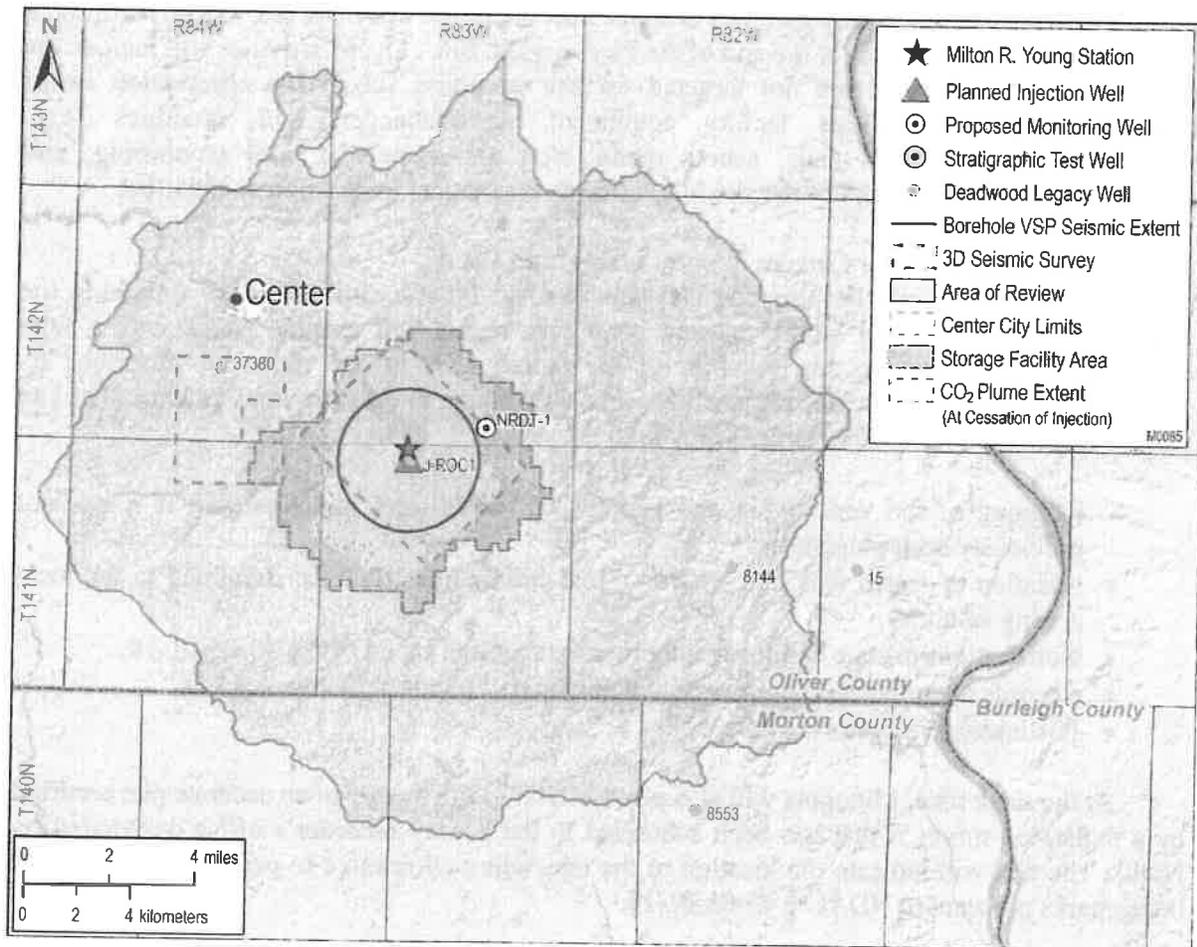


Figure 4-19. Areal extents of the 3D and borehole seismic surveys proposed during the PISC period in comparison to the areal extent of the CO₂ plume at cessation of injection.

4.7.3.1 Schedule for Submitting Postinjection Monitoring Results

All postinjection site care-monitoring data and monitoring results will be submitted to NDIC in annual reports. These reports will be submitted each year, within 60 days following the anniversary date on which the CO₂ injection ceased. Water sample analytical results will also be submitted to the ND State Water Commission.

The annual reports will contain information and data generated during the reporting period, including seismic data acquisition, formation-monitoring data, soil gas and groundwater sample analytical results, and simulation results from updated site models and numerical simulations.

4.7.3.2 Site Closure Plan

Minnkota will submit a final site closure plan and notify NDIC at least 90 days prior of its intent to close the site. The site closure plan will describe a set of closure activities that will be performed, following approval by NDIC, at the end of the PISC period. Site closure activities will include the plugging of all wells that are not targeted for use as future subsurface observation wells; decommissioning of storage facility equipment, appurtenances, and structures (e.g., structures/buildings, gravel pads, access roads, etc.) not associated with monitoring; and reclaiming of the surface land of the site to as close as is practical to its original condition.

4.7.3.3 Submission of Site Closure Report, Survey, and Deed

A site closure report will be prepared and submitted to NDIC within 90 days following the execution of the PISC and facility closure plan. This report will provide NDIC with a final assessment that documents the location of the stored CO₂ in the reservoir, describes its characteristics, and demonstrates the stability of the CO₂ plume in the reservoir over time. The site closure report will also document the following:

- Plugging of the verification and geophysical wells (and injection well if it has not previously been plugged).
- Location of sealed injection well on a plat survey that has been submitted to the local zoning authority.
- Notifications to state and local authorities as required by NDAC § 43-05-01-19.
- Records regarding the nature, composition, and volume of the injected CO₂.
- Postinjection monitoring records.

At the same time, Minnkota will also provide NDIC with a copy of an accurate plat certified by a registered surveyor that has been submitted to the county recorder's office designated by NDIC. The plat will indicate the location of the injection well relative to permanently surveyed benchmarks pursuant to NDAC § 43-05-01-19.

Lastly, Minnkota will record a notation on the deed (or any other title search document) to the property on which the injection well was located pursuant to NDAC § 43-05-01-19.

4.8 References

- ASTM International, 2017, ASTM G1-03(2017)e1, Standard practice for preparing, cleaning, and evaluating corrosion specimens: West Conshohocken, Pennsylvania, ASTM International, www.astm.org (accessed December 2020).
- Reed, S., Ge, J., Burnison, S.A., Bosshart, N.W., Hamling, J.A., and Gorecki, C.D., 2018, Viability of InSAR as a monitoring tool in challenging terrain: Bell Creek, Montana: Paper presented at the 14th International Conference on Greenhouse Gas Control Technologies (GHGT-14), Melbourne, Australia, October 21–25, 2018.
- Vasco, D.W., Dixon, T.H., Ferretti, A., and Samsonov, S.V., 2020, Monitoring the fate of injected CO₂ using geodetic techniques: *The Leading Edge*, v. 39, no. 1, p. 29–37.

5.0 INJECTION WELL AND STORAGE OPERATIONS

This section of the storage facility permit (SFP) application presents the engineering criteria for completing and operating the injection well in a manner that protects underground sources of drinking water (USDWs). The information that is presented meets the permit requirements for injection well and storage operations as presented in North Dakota Administrative Code (NDAC) § 43-05-01-05 (SFP, Table 5-1) and NDAC § 43-05-01-11.3

Table 5-1. McCall-1 Proposed Deadwood Injection Well Operating Parameters

Predicted Metric	McCall-1	Description/Comments
Injection Volume		
Total Injected Volume, MMt	23.4	Based on 20 years of injection.
Injection Rate		
Predicted Average Injection Rate, tonnes per day	3,250	Based on total injected volumes for 20 years and using 365 operating days a year.
Maximum Predicted Daily Injection Rate, tonnes per day	3,865	Based on 20 years of injection.
Pressure		
Formation Fracture Pressure at Top Perforation, psi	6,866	The injectivity test results fracture closure gradient of 0.75 psi/ft.
Average Predicted Operating Surface Injection Pressure, psi	2,794	Based on 20 years of injection.
Maximum Wellhead Injection Pressure, psi	3,445	Maximum wellhead injection pressure is limited based on surface facility constraints and 90% of formation fracture pressure.
Average Predicted Operating Bottomhole Pressure (BHP), psi	6,139	Based on 20 years of injection.
Maximum BHP psi	6,179	Calculated maximum BHP using 90% of the closure pressure from the injectivity test at the top of the perforation. Maximum BHP is limited based on surface facility constraints.

5.1 Proposed Completion Procedure to Conduct Injection Operations in the Deadwood Injection Well

Minnkota Power Cooperative (Minnkota) plans to construct one carbon dioxide (CO₂) injection well (McCall-1) designed by Oxy Low Carbon Ventures in compliance with Class VI UIC (underground injection control) injection well construction requirements, as discussed in previous sections and drilled according to the proposed program in the permit to drill. The following proposed completion procedure outlines the steps necessary to complete a Deadwood well for injection purposes (Figure 5-1, Table 5-2).

McCall-1
(Deadwood Injector)

KB: 2022 ft / GI: 1997 ft
Latitude / Longitude : 47.0627201 N ; 101.2131405 W

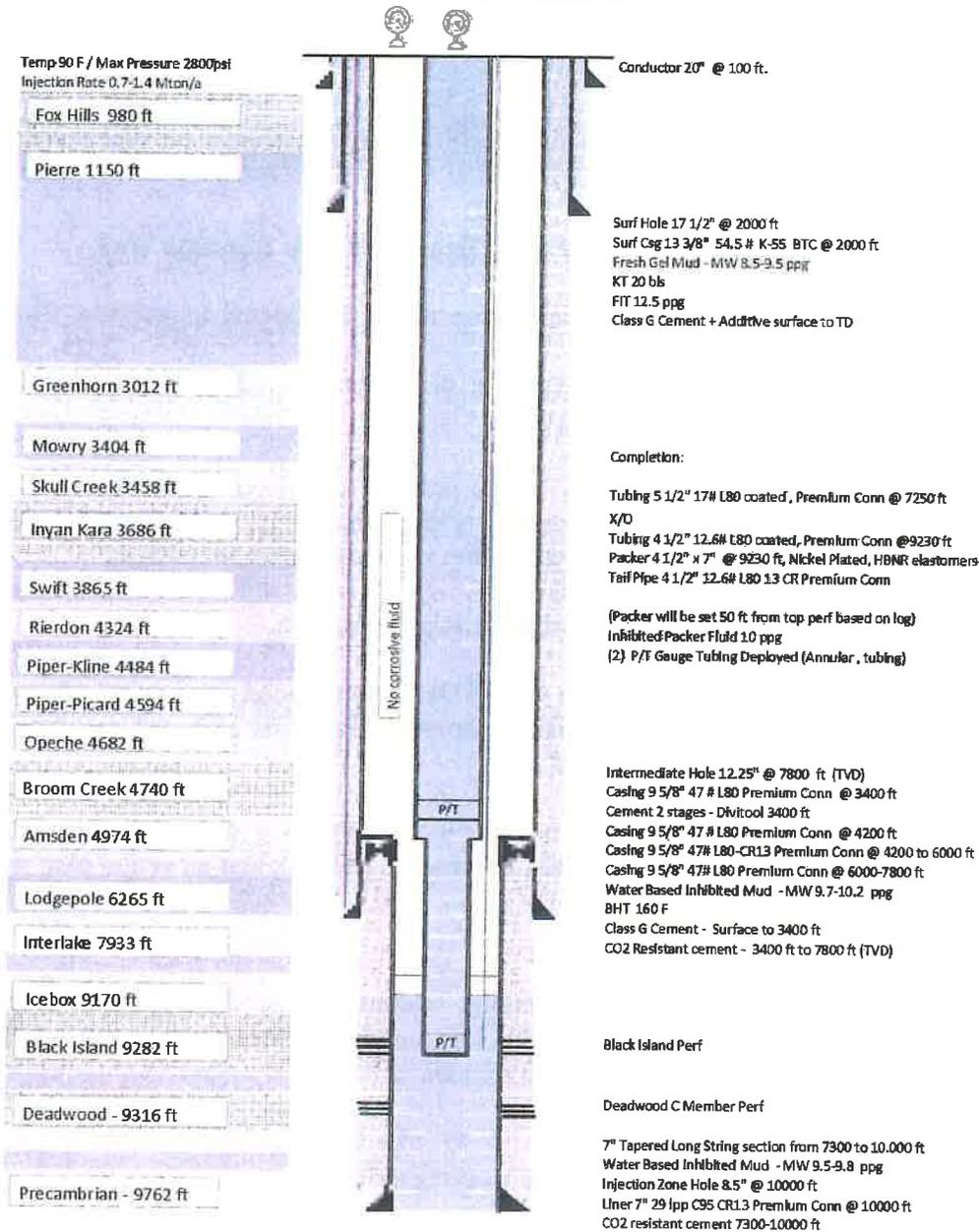


Figure 5-1. McCall-1_Deadwood injection well proposed completion wellbore schematic.

Table 5-2. McCall-1 Deadwood Injection Well Proposed Casing Properties

Casing Description ID	Hole, in.	Depths, ft	ID, in.	Drift, in.	Burst, psi	Collapse, psi	Tension, Klb	OD Thread, in.
13.375" 54.5# K55 BTC	17.5	0–2,000	12.615	12.459	2,730	1,130	766	14.375
9.625" 47# L80 Premium Conn	12.25	0–4,200	8.681	8.525	6,870	4,750	1,086	10.625
9.625" 47# L80 13Cr Premium Conn	12.25	4,200–6,000	8.681	8.525	6,870	4,750	1,086	10.625
9.625" 47# L80 Premium Conn	12.25	6,000–7,800	8.681	8.525	6,870	4,750	1,086	10.625
7" 29# C95 13Cr Premium Conn	8.5	7,300–10,000	6.184	6.059	9,690	7,840	803	7.656

5.2 Proposed Completion Procedure for McCall-1 Deadwood CO₂ Injectate Well

1. Pick up work string with 8½" bit to clean cement on top of the tapered long string. Clean cement, circulate, and pull out of the hole.
2. Pick up work string with 6¾" and rotating scrapper to clean cement inside of the tapered long string. Clean cement to the top of the landing collar.
3. Circulate with brine 10 ppg.
4. Test casing for 30 minutes with 1,500 psi. If the pressure decreases more than 10% in 30 minutes, bleed pressure, check surface lines and surface connections, and repeat test. If the failure persists, the Operator may require assessing the root cause and correcting it.
5. Pull bottomhole assembly (BHA) out of the hole.
6. Perform safety meeting to discuss logging and perforating operations.
7. Rig up logging truck.
8. Run cased hole logs by program. **Note:** run CBL/VDL (cement bond log/carriable-density log) and USIT (ultrasonic imaging tool) without pressure as a first pass and run it with 1,000 psi pressure as a second pass, if needed.

Note: In case the cementing logs show poor bonding in the cementing job, the results will be communicated to the North Dakota Industrial Commission (NDIC), and an action plan will be prepared.

9. Run perforating guns to the injection target.
10. Perforate the Black Island and Deadwood Formation, minimum 4 spf (shots per foot). Depth will be defined with the final log. Gas gun technology or high-performance guns should be evaluated to provide deeper penetration into the formation.
11. Pull guns out of the hole.
12. Rig down logging truck.
13. Pick up straddle packer and run in the hole with working string.
14. Circulate with brine 10 ppg.
15. Set packer in the Deadwood Formation to isolate the perforations.
16. Rig up acid trucks and equipment.
17. Perform cleaning of the perforations with acid (design volumes and pressures will be evaluated based on the well conditions once drilled). Adjust acid formulation and volumes with water samples and compatibility test.
18. Rig down acid trucks and equipment.

19. Perform an injectivity test/step rate test.
20. Unset packer and circulate hole.
21. Set packer in the Black Island Formation to isolate the perforations.
22. Rig up acid trucks and equipment.
23. Perform cleaning of the perforations with acid (design volumes and pressures will be evaluated based on the well conditions once drilled). Adjust acid formulation and volumes with water samples and compatibility test.
24. Rig down acid trucks and equipment.
25. Perform an injectivity test/step rate test.
26. Unset packer and circulate hole.
27. Pull packer and work string out of the hole.
28. Rig up spooler and prepare rig floor to run upper completion.
29. Run completion assembly per program.
30. Circulate well with inhibited packer fluid.
31. Set packer 50 ft above the top perforations.
32. Install tubing sections, cable connector, and tubing hanger.
33. Rig up logging truck.
34. Run cased hole logs through tubing by program.
35. Rig down logging truck.
36. Nipple down BOP (blowout preventer).
37. Install injection tree.
Note: Figure 5-2 illustrates the proposed wellhead schematic
38. Rig down equipment.

Note: DTS/DAS (distributed temperature sensing/distributed acoustic sensing) fiber optic will be run and attached to the exterior of the intermediate casing. Special clamps, bands, and centralizers will be installed to protect the fiber and provide a marker for wireline operations.

Note: Tapered long string hanger should include top packer seal.

The McCall-1_Deadwood CO₂ Injection Well Proposed Tubing Design is detailed in the following section (Table 5-3).

Table 5-3. McCall-1 Deadwood CO₂ Injection Well Proposed Tubing Design

Description	Type, in.	Depths, ft	ID, in.	Burst, psi	Collapse, psi	Tension, Klb	OD Thread, in.
5.5" 20# L80 Coated Premium Conn	Tubing	0-7,250	4.778	9,190	8,830	466	6.05
4.5" 12.6# L80 Coated Premium Conn	Tubing	7,250-9,230	3.958	8,430	7,500	288	5.2
Packer 4.5" × 7"	50 ft above Perf.		Nickel-Plated, HNBR*				
4.5" 12.6# L80 13Cr Premium Conn	Tubing	9,230-9,400	3.958	8,430	7,500	288	5.2

* Hydrogenated nitrile butadiene rubber.

1. Packer depth will be adjusted with the final perforation depth interval.
2. Packer will be set 50 ft above top perforations.
3. Packer is required to be nickel-plated with HNBR elastomers.

4. Inconel cable along with quartz pressure and temperature gauges will be run in upper completion.

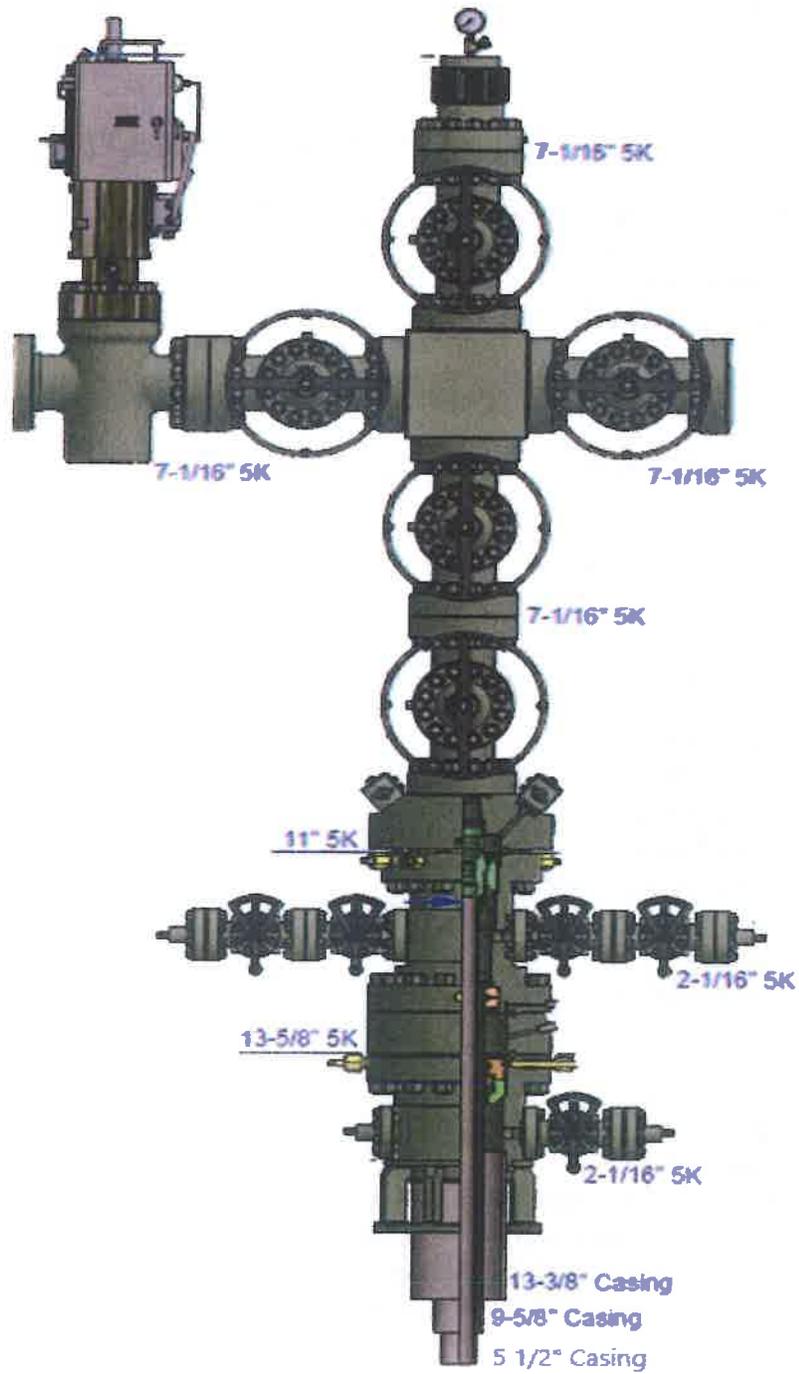


Figure 5-2. Proposed Deadwood injection well CO₂-resistant wellhead schematic.

5.3 Logging Program

The proposed logging program is detailed in Table 5-4.

Table 5-4. McCall-1 Deadwood CO₂ Injection Well Proposed Logging Program

Section	Type	Depth, ft
17½" Hole	Open Hole: Resistivity, GR (gamma ray), SP (spontaneous potential), Temperature	0–2,000
	Cased Hole: CBL/VDL	0–2,000
12¼" Hole	Open Hole:	
	Induction Resistivity	2,000–7,800
	Density	2,000–7,800
	Neutron	2,000–7,800
	Sonic Dipolar	2,000–7,800
	GR	2,000–7,800
	Caliper	2,000–7,800
	Temperature Log	2,000–7,800
	SP	2,000–7,800
	Spectral GR	2,000–7,800
	Full-Bore Formation Microimager	4,400–7,800
	Cased Hole:	
	CBL–VDL–Ultrasonic	2,000–7,800
	Temperature – Calibration DTS	0–7,800
8½" Hole	Open Hole:	
	Induction Resistivity	7,800–10,000
	Density	7,800–10,000
	Neutron	7,800–10,000
	Sonic Dipolar	7,800–10,000
	GR	7,800–10,000
	Caliper	7,800–10,000
	Temperature Log	7,800–10,000
	SP	7,800–10,000
	Spectral GR	8,500–10,000
	Full-Bore Formation Microimager	8,500–10,000
	10 SWC (sidewall coring: seals, injection zones)	Depth by log
	5 Fluid Samples (injection zones)	Depth by log
	25 MDT (modular formation dynamics tester: injection zones)	Depth by log
Cased Hole:		
CBL–VDL–Ultrasonic	7,300–10,000	
Casing Inspection Log – Through Tubing	0–10,000	
Active Pulse Neutron – Through Tubing	8,500–10,000	

5.4 BOP Equipment (BOPE)

1. BOPE must be API-monogrammed and adhere to API Standard 53, Specifications 16A and 16C, at a minimum, and meet or exceed all applicable regulatory specifications (Figure 5-3).
2. BOPE other than annular preventers must have a minimum working pressure exceeding the maximum anticipated surface pressure (MASP).
3. All BOPE stacks must incorporate a set of blind or blind/shear rams.
4. Blind rams must be located in the lower ram cavity of a two-ram stack or middle ram cavity of a three-ram stack.
5. Choke and kill line outlets must be located below the blind rams on either a three- or two-ram stack.
6. All rigs must have a calibrated trip tank. The trip tank and trip sheet are used to measure the fluid required to fill or displace from the hole during all tripping operations, including casing running or completion string running. Trip sheets must include number of joints or stands run into or pulled from the hole versus the calculated and actual displacements per step and running total as a minimum.
7. A full opening safety valve (FOSV) and an inside BOP safety valve (IBOPSV) must be always available on the rig floor for each drill pipe, drill collar size, and connection type in use. The FOSV is used to stab into the string and shut off flow through the drill string. The IBOPSV is used above the FOSV to prevent backflow through the drill string. The tools must remain in the fully open position until installed.

Note: This requirement is in addition to any integral safety valve in the top drive system inclusive of casing running operations. In the event of a power failure on a VFD (variable frequency drive) rig, it is impossible to slack off and make up the top drive to the string; therefore, an additional independent stabbing valve(s) is needed on the floor at all times.

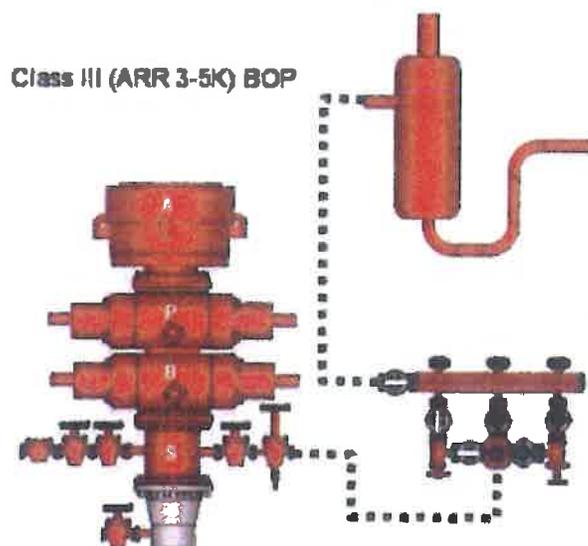


Figure 5-3. Proposed Deadwood Injection Well BOP schematic.

8. If a wireline lubricator is utilized for wireline operations, it should not be the type that slips into and is held by the annular preventer or rams. A hydraulic cutter or other means of safely cutting the wireline must be available if a lubricator is not in use.
9. Pressure-energized metal ring gaskets must be used on flanged well control equipment. The gaskets must not be reused on equipment that will be nipples up on the wellbore.

5.4.1 Choke Manifolds and Kill Line

1. The choke manifold must be API-monogrammed, meet API Spec. 16C at a minimum, and meet or exceed all applicable regulatory specifications.
2. All BOPE must include a choke manifold with at least one remotely operated choke and one manual choke installed. The control panel must contain calibrated drill pipe and casing pressure gauges that must be both accurate and maintained. The choke manifold casing pressure should have the capability of being recorded on the rig drilling recorder. If necessary, for clear dialogue, an electronic means of direct communication with the driller should be in place. This equipment must be tested and calibration-checked at each casing shoe, as well as at every BOPE test, and will be logged on every BOPE test report.
3. Flare/vent lines must be as long as practical, a minimum of 150' from well center, as straight as possible, without sumps, collection areas, or uphill flow areas (to prevent fluids buildup and resulting backpressure), and securely anchored.

5.4.2 Closing Units

1. BOPE closing units must adhere to API Spec 16D and API STD 53 at a minimum and meet or exceed all applicable regulatory specifications.
2. BOPE control systems must include full controls on the closing unit, and at least one remote control station. One control station must be located within 10 feet of the drillers console.
3. The BOPE closing unit must have two separate charging pumps with two independent power sources, as specified in API Spec. 16D, or N₂ bottle backup.
4. Closing units must have sufficient usable hydraulic fluid volume with pumps inoperative, to close one annular preventer, close all ram preventers, and open one HCR (high closing ratio) valve against zero wellbore pressure with 200 psi remaining pressure above the precharge pressure.

5.4.3 Pressure Testing

1. BOPE components (including the BOP stack, choke manifold, and choke lines) must be pressure-tested at the following frequency:
 - a. When installed. If the BOPE is stump-tested, only the new connections are required to be tested at installation.
 - b. Before 21 days have elapsed since the last BOPE pressure test. When the 21-day test is due in the near future, consider testing BOPE prior to drilling H₂S, abnormal pressure, or any lost return zones in order to avoid testing while drilling these intervals.
 - c. Anytime a BOPE connection seal is broken, the break must be pressure-tested.
 - d. When utilizing tapered strings, variable bore-type rams and annular preventer must be pressure-tested with all tubing or drill pipe sizes anticipated to be used.

2. BOPE should be tested using a test plug or other means to isolate the casing and open hole from the test pressures. The casing head valve should be opened and monitored to avoid exerting BOPE test pressure on the casing or open hole.
3. BOP components must first be low-pressure-tested to between 250 and 350 psi. If during the test, the pressure exceeds 350 psi, the pressure must be bled off to 0 psi and the test restarted. Pressuring up beyond 350 psi can induce a seal and give a false test result.
4. BOPE components, excluding the annular preventer, must be tested to the lesser of Rated Working Pressure (RWP) or wellhead RWP, if less than BOPE RWP. The annular preventer must be tested to 70% of its RWP. In all cases, the test pressure must not exceed the RWP of any components being tested.
5. Use of a cup tester should be avoided. If a cup tester is utilized for BOP testing, consideration must be given to casing burst pressure and possible pressure applied to the casing string or open hole below the cup tester in the event of a leaking cup tester.
6. An accumulator closing test must be performed after the initial nipple up of the BOP, after any repairs that required isolation or partial isolation of the system, or at initial nipple up on each well.
7. During the course of drilling, the pipe rams must be functionally operated at least once every 24-hour period. The blind rams must be functionally operated each trip out of the wellbore.

5.4.4 Wellhead

- Casing head 13⁵/₈" – 5K flanged.
- Two 2¹/₆" valves in casing head.
- Tubing spool 13⁵/₈" 5K × 11" 10K flanged.
- Production tree assembly 7¹/₆" 10K FF: two master valves, cross, one swab valve, tubing hanger 11" × 7" FF.

APPENDIX A

DATA, PROCESSING, AND OUTCOMES OF CO₂ STORAGE GEOMODELING AND SIMULATIONS

DATA, PROCESSING, AND OUTCOMES OF CO₂ STORAGE GEOMODELING AND SIMULATIONS

INTRODUCTION

Minnkota Power Cooperative's (Minnkota's) Tundra SGS (secure geologic storage) site located proximate to the Milton R. Young Station (MRYS) has been a focus of investigation of future potential commercial-scale carbon dioxide (CO₂) injection within the sandstones of the Black Island and Deadwood Formations. The Tundra SGS site is located near Center, North Dakota, in the south-central portion of the Williston Basin.

Multiple sets of publicly available data, including well logs and formation top depths, were acquired from the online database of the North Dakota Industrial Commission (NDIC). Site-specific data, which were collected as part of storage reservoir characterization efforts and included geophysical well logs, petrophysical analyses, formation fluid analyses, and surface seismic surveys, were also used in the model construction. Two 3D seismic surveys were collected over the Tundra SGS site, and two stratigraphic test wells were drilled to augment data available from offset wells in the study area. Data collected from these sources were incorporated into a geologic model of the Black Island and Deadwood Formations and the overlying and underlying sealing formations. Simulated CO₂ injection studies were conducted to determine the wellhead and downhole pressure response resulting from injection and displacement of injected CO₂ within the Black Island Formation and Deadwood Formation E and C Members. Reservoir conditions observed from the stratigraphic test wells were used to characterize and establish initial conditions. Results of the injection studies were then used to determine the project's area of review (AOR) pursuant to North Dakota's geologic CO₂ storage regulations.

The well logs acquired in the J-LOC1 and J-ROC1 wells (NDIC file numbers 37380 and 37672, respectively) (Figure A-1) were used to pick formation top depths, interpret lithology, estimate petrophysical properties, and determine a time–depth shift for seismic data. Formation top depths were picked from the top of the Pierre Formation to the top of the Precambrian basement. Regional formation top depths from wellbores within a 56-mile radius around the proposed storage site were added to the J-LOC and J-ROC1 site-specific data to understand the geologic extent, depth, and thickness of subsurface geologic strata. Lateral structure trends from the acquired seismic data were used to reinforce interpolation of the formation tops to create structural surfaces that served as inputs for geologic model construction.

Core samples obtained from the J-LOC1 wellbore were analyzed as inputs for modeling and simulation. These analyses included x-ray fluorescence (XRF), x-ray diffraction (XRD), thin sections, porosity, and flow measurements. Knowledge gained from these site-specific core data analyses and well logs collected from the J-LOC1 wellbore were used to determine Black Island and Deadwood Formation lithologies in legacy wellbores throughout the area for which no core data were collected. Lithologies assigned to each wellbore were then used to generate the lithofacies properties of the injection zone. Eleven offset wells with porosity logs were used to inform petrophysical property distributions in addition to the core data from J-LOC1. The various data sets derived from J-LOC1 and J-ROC1 showed good agreement with the offset well data available near the J-LOC1 site.

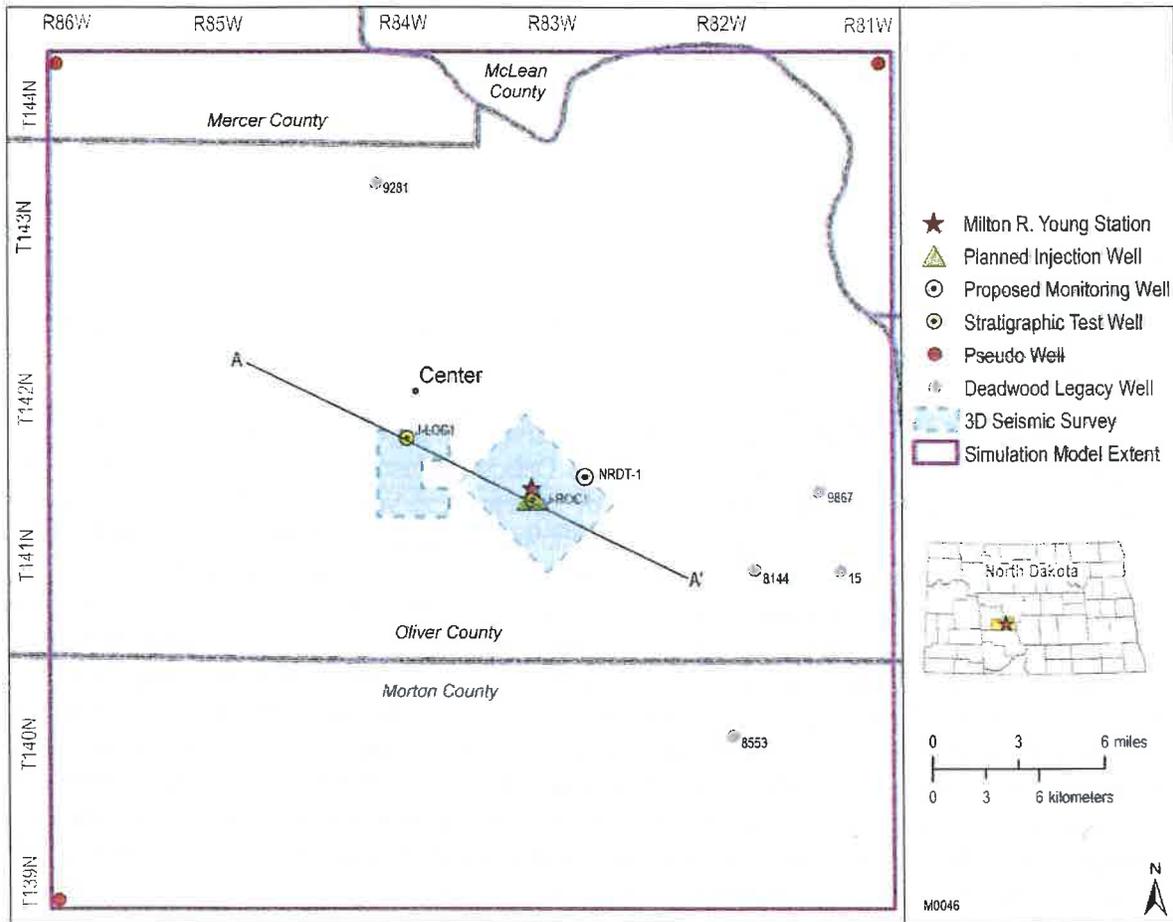


Figure A-1. Map of the geologic model boundary (purple polygon), seismic surveys (green polygons), pseudowells (NE-pseudo, NW-pseudo, and SW-pseudo represented as red circles) and nearby Deadwood wells.

A geologic model was constructed using Schlumberger’s Petrel software suite (Schlumberger, 2020). Petrel is a software platform that allows for the development of geologic models using well and seismic data in combination with geostatistics. The geologic model is a digital representation of the subsurface geology, including the proposed CO₂ storage reservoir and its primary confining zones. The upper confining zone includes (descending order) the Roughlock and Icebox Formations Figure (A-2). The upper 50 ft of the Precambrian basement was included to test confinement of injection pressure to the Deadwood B Member shale in simulation. Geologic properties were distributed within the 3D model as inputs for numerical simulations of CO₂ injection to predict the migration of CO₂ and pressure effects throughout the storage reservoir. These geologic properties included 1) lithofacies (bodies of rock with similar geologic characteristics) which were used to assign relative permeability curves 2) porosity, and 3) permeability.

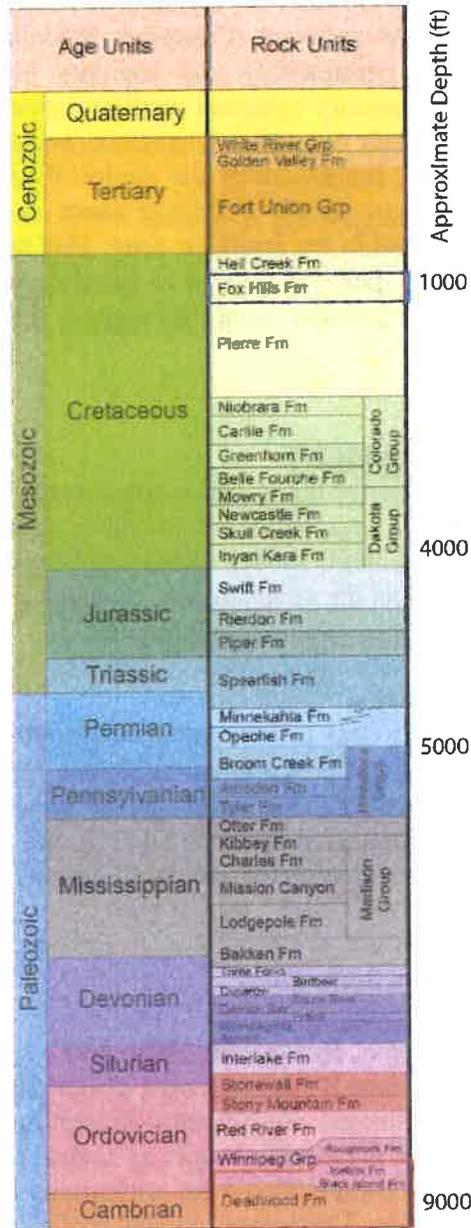


Figure A-2. Stratigraphic column identifying the storage reservoir and confining zones (red polygon) and lowest underground source of drinking water (blue polygon) for the geology underlying the Tundra SGS storage facility area.

The geologic model provided the basis for inputs of fluid flow simulations using Computer Modelling Group's (CMG's) GEM software (Computer Modelling Group, 2019). Fluid flow properties, such as the relative permeability and capillary pressures associated with each lithofacies, were determined by mercury injection capillary pressure (MICP) measurements of representative core samples from their respective formations, and then adjusted for the geomodel-inferred average porosity of each lithofacies in the model. Finally, the fluid flow simulation permeability was tuned using a permeability multiplier based on measured permeability during brine injectivity tests conducted within the injection zone. This tuned simulation to site-specific injectivity testing and core sample data was utilized to simulate expected CO₂ injection capacity and the resulting CO₂ plume and pressure plume throughout the project life and postinjection period.

GEOLOGIC MODEL DEVELOPMENT

The activities performed to characterize the injection zone, overlying formations, and underlying confining formations included data aggregation, structural modeling, data analysis, and property distribution. Major inputs for the geologic model, which acted as control points during distribution of the geologic properties throughout the modeled area, included seismic survey data, geophysical well logs from nearby wells, and core sample measurements.

Structural Framework Construction

Schlumberger Petrel software was used to interpolate structural surfaces for the Icebox, Black Island, and Deadwood Formations and Precambrian basement. Input data included formation top depths from the online NDIC database and supported by conventions described in literature (LeFever and others, 1987), data collected from the J-LOC1 and J-ROC1 wells, and 3D seismic surveys conducted at the site. The interpolated structural data were used to constrain the model extent in 3D space.

Data Analysis and Property Distribution

Confining Zones (Icebox Formation, Deadwood B Member)

The Icebox Formation and Deadwood B Member were assigned shale lithofacies; classifications were determined as primary lithologic constituents through well log analysis. Porosity and permeability logs were upscaled to the model to serve as control points for property distributions. The control points were used in combination with variograms and Gaussian random function simulations to distribute properties. Variograms model spatial variance of data in lateral and vertical directions to allow for interpolation through geostatistical methods. A variogram with a major axis range of 6,500 ft, minor axis range of 6,000 ft, and an azimuth of 90° was used for the Icebox Formation. In the Deadwood B Member, a variogram with major and minor axis lengths of 5,000 ft with an azimuth of 0° was used. A vertical variogram length of 6 ft was used for all confining zones.

Injection Zone (Black Island and Deadwood Formations)

Seismic data were resampled to match the resolution of the geologic model grid and used to determine variogram direction and an estimate of ranges by creating a variogram map. A variogram map is a 2D representation of the variograms calculated for all directions (0°–359°) for

the input data. Variogram mapping investigations indicated that geobody structures with the following dimensions are present in the Black Island Formation: major and minor axis ranges of 5,000 ft. In the Deadwood E Member, investigation indicated major axis range of 5,500 ft, minor axis range of 5,000 ft, and an azimuth of 155°. In the Deadwood C Member sandstone, investigation indicated major axis range of 6,000 ft, minor axis range of 5,500 ft, and an azimuth of 30°. Well logs recorded from J-LOC1 and J-ROC1 and offset wellbores served as the basis for deriving a vertical variogram length of 6 ft.

Available sonic well logs (ΔT) and bulk density (RHOB) in the area were transformed to acoustic impedance (AI) logs ($AI = RHOB * 1,000,000 / \Delta T$) to aid in discovering trends between well log data and seismic AI data. The AI from 3D seismic surveys (east and west) was edited to remove edge effects. The east 3D AI range was rescaled into alignment of the west 3D prior to combining the volumes to account for the differences in acquisition methods.

The AI logs were smoothed to resolve vertical resolution differences between the seismic and well log resolutions. By using an arithmetic smoothing window centered on each depth point, the smoothed well log AI with a 40-ft sampling window, AI_40, provides the best correlation to the seismic AI and to well AI. A correlation coefficient of 0.609 was observed between the smoothed AI_40 logs and seismic AI. Also, a decent correlation of 0.7353 was seen between AI_40 and initial AI data (Figure A-3). This correlation allows for a high level of control when using seismic results to apply trends during property distributions.

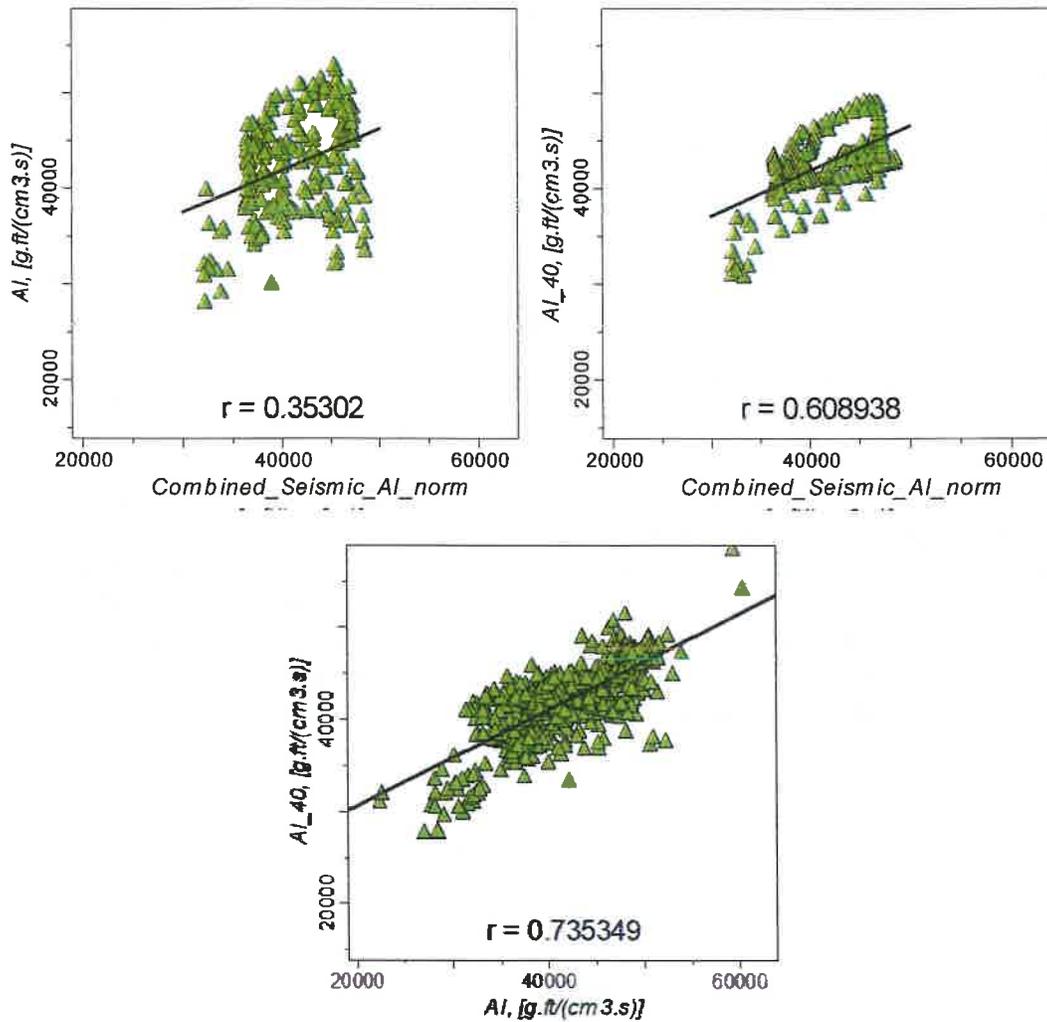


Figure A-3. Correlation coefficient between well log-derived AI and seismic AI data: 1) correlation coefficient of 0.3530 was determined based on the initial data (top left panel), 2) correlation coefficient of 0.6089 was determined after performing smoothing over a 40-ft window to resolve vertical resolution differences (top right panel), and 3) correlation coefficient of 0.7353 was determined based on the initial data (AI) and smoothed data (AI_40) (bottom).

The AI_40 logs were distributed over the seismic area using Gaussian random function simulation, the upscaled pointset, and variogram structures described previously for each zone. Then the AI logs were distributed throughout 3D volume using the same variogram parameters described previously and cokriged with the distributed AI_40 for each zone with a colocated cokriging coefficient of 0.75 (Figure A-4). The distributed AI property (Figure A-5) was used to distribute lithofacies and petrophysical properties to better link them to the seismic data.

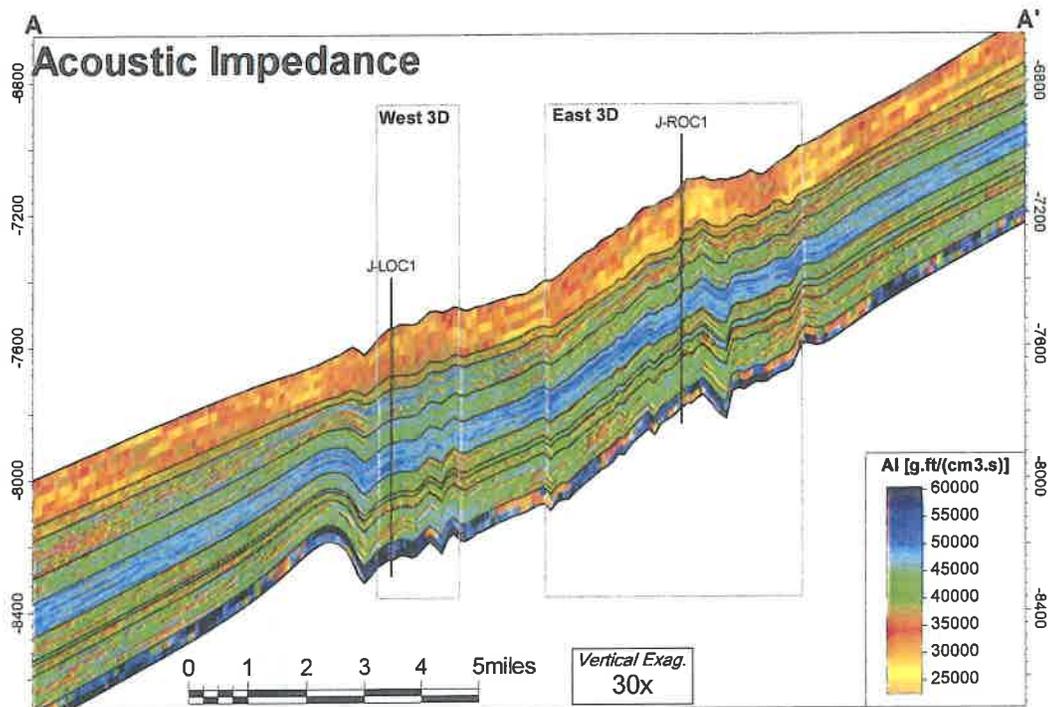


Figure A-4. Distributed AI property along the NW–SE cross section. The distributed property was used to distribute lithofacies and petrophysical properties to seismic data. Vertical units on the y-axis are displayed as feet below mean sea level (30× vertical exaggeration shown).

Because of the low count of well logs containing both ΔT and RHOB logs immediately near the J-LOC1 and J-ROC1 wellsites, three pseudowells were added to the geologic model: one at the northeast (NE-pseudo), one at the northwest (NW-pseudo), and one at the southwest (SW-pseudo) corners of the model boundary (Figure A-1). The well log AI, bulk density, neutron porosity, sonic, resistivity, gamma ray, effective and total porosity, volume of clay, and permeability data from offset wells from both outside and inside the bounds of the model were projected onto the pseudowells. The values of the offset well logs were weighted using inverse distance squared to project the ΔT and RHOB logs to the pseudowells. These data were used to help control AI distribution outside of the seismic boundary to the edges of the model boundary.

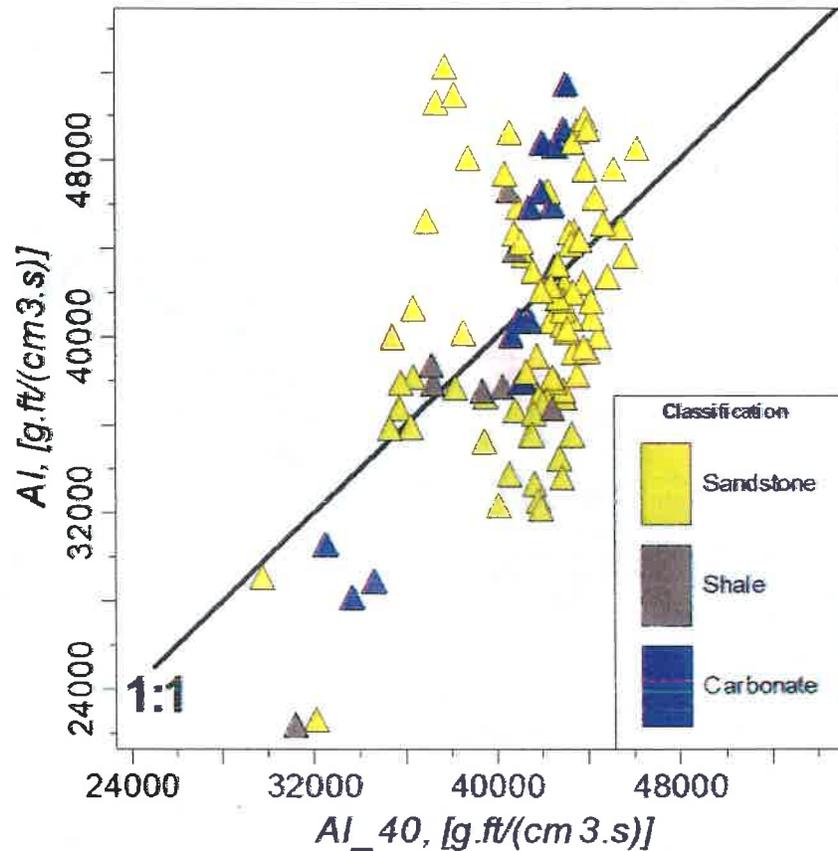


Figure A-5. Upscaled AI vs. upscaled AI₄₀ for Black Island Formation, Deadwood E Member, and Deadwood C Member sandstone. Points representing upscaled cells are colored by interpreted lithology: yellow represents sandstone, dark blue represents carbonate, and gray represents shale. AI₄₀ provided a better separation between sandstone facies and shale facies, while AI has a slight separation between carbonate and noncarbonate facies.

Lithofacies classification was determined from well log data and correlated with descriptions of core taken from the J-LOC1 well. Facies logs were upscaled into a structure grid with an average cell size of 500 ft × 500 ft × 5 ft (I, J, and K directions, respectively). Trend modeling was employed to build a 3D probability trend for each lithofacies utilizing the AI and smoothed AI (AI₄₀). The trend model used an isometric 10,000-ft variogram length and simple kriging type. Figure A-5 demonstrates the better facies separation between sandstone and nonsandstone facies using AI₄₀ rather than AI. The slight facies separation between carbonate and shale facies is seen using AI rather than AI₄₀. Along with the 3D probability trends for each facies, facies distributions were performed using sequential indicator simulation. Variogram models described previously guide the distribution of facies in each zone (Figures A-6 and A-7).

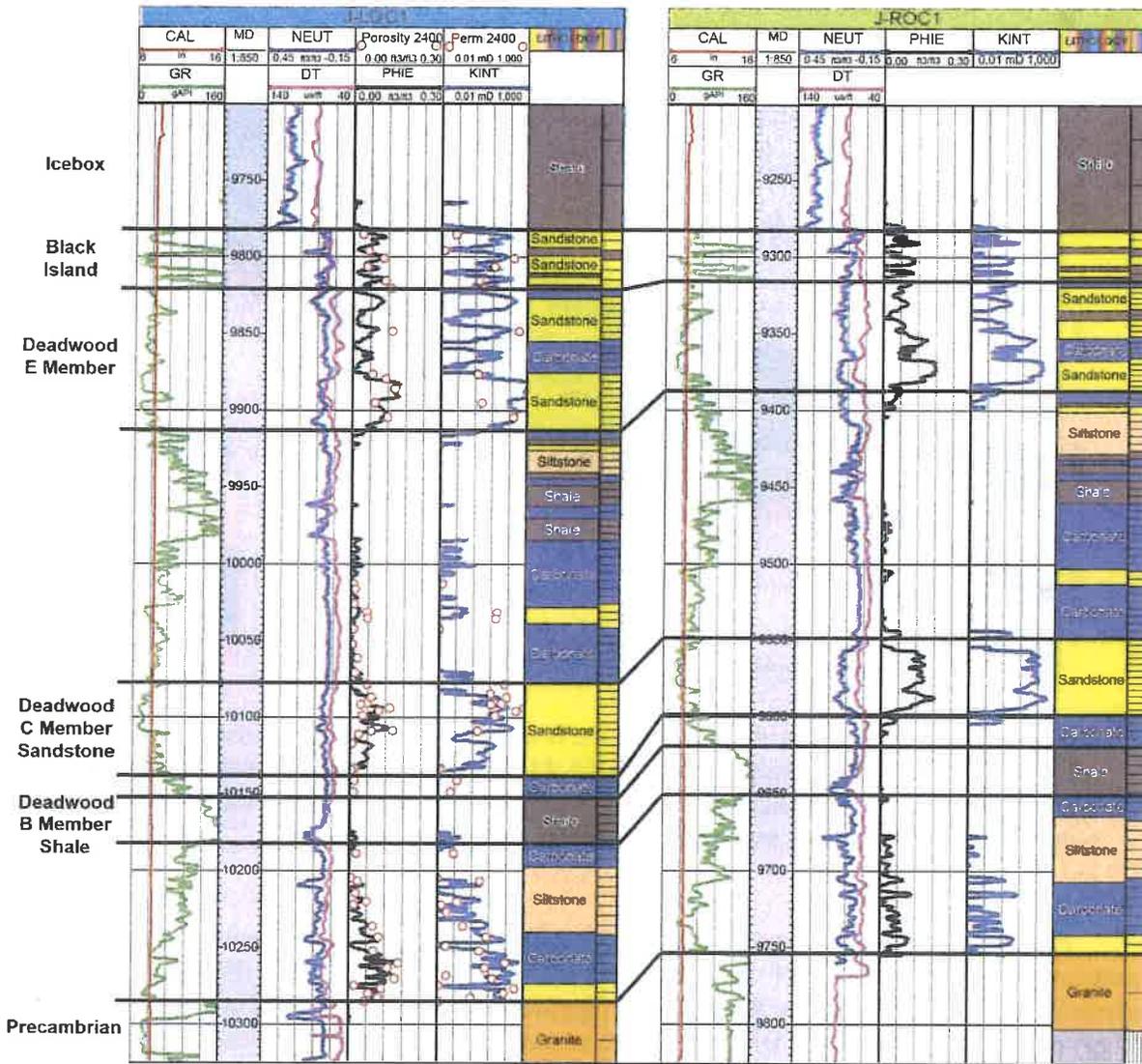


Figure A-6. Lithofacies classification in wells J-LOC1 and J-ROC1. Logs displayed in tracks from left to right are 1) gamma ray (green) and caliper (red), 2) measured depth in feet, 3) neutron porosity (dark blue) and delta time (purple), 4) effective porosity (black) and core porosity (red dots), 5) permeability (dark blue) and core permeability (red dots), 6) interpreted lithology log, and 7) upscaled lithology.

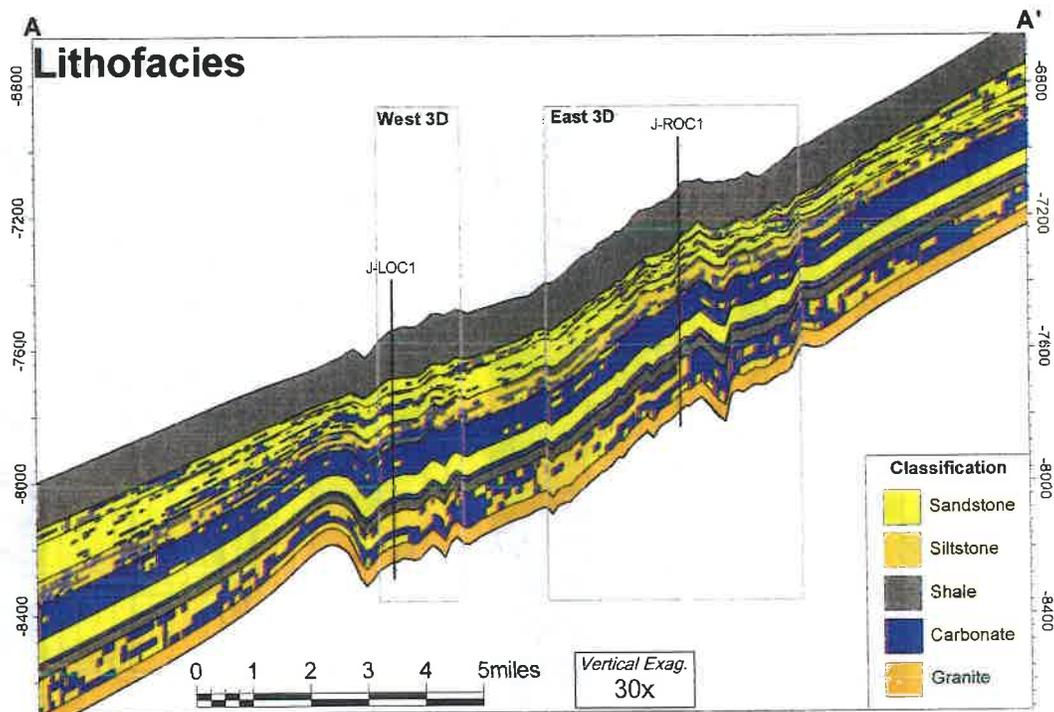


Figure A-7. Lithofacies distribution along the NW–SE cross section. Sandstone and carbonate distributions correlate well with the AI property. The heterogeneity observed across the seismic data is matched outside seismic control (Figure A-4). Vertical units on the y-axis represent feet below sea level (30× vertical exaggeration shown).

Prior to distributing the porosity and permeability properties, core porosity and permeability measurements from the J-LOC1 well were compared with effective porosity (PHIE) well logs and permeability estimated from the Wyllie–Rose (Wyllie and Rose, 1950) model utilizing the Morris–Biggs parameters (Morris and Biggs, 1967) to ensure good agreement between the two data sets (Figure A-6). Total porosity (PHIT) was upscaled to the model to be used as control points for distribution. PHIT was distributed by zone and lithology using Gaussian random function simulation and variogram models described previously and cokriged with AI volume using a correlation coefficient of -0.88. PHIE was distributed (Figure A-8) using the same variables as PHIT and cokriged to PHIT with a correlation coefficient for each zone and lithology. Intrinsic permeability (KINT) was distributed using the same variables and cokriged to PHIE volume.

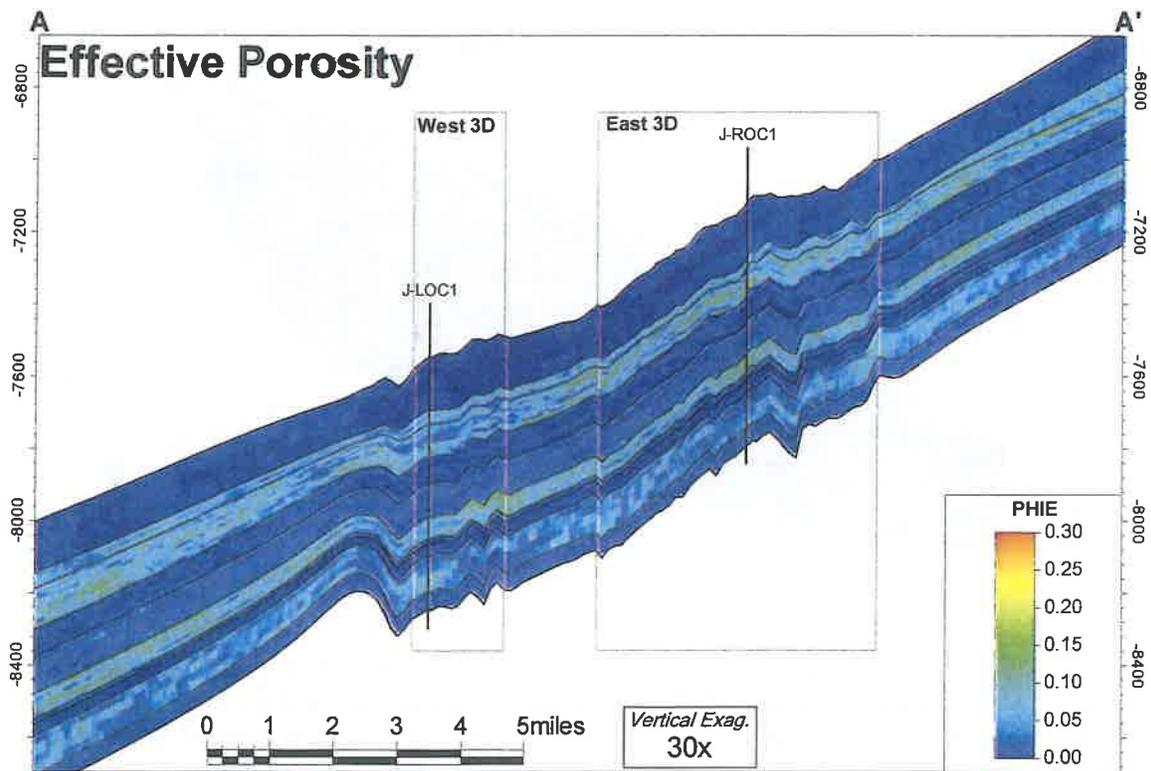


Figure A-8. Effective porosity distribution throughout the 3D gridded volume along NW-SE cross section. Units on the y-axis represent feet below sea level (30× vertical exaggeration shown).

Numerical Simulation

Numerical simulations of CO₂ injection into the Deadwood Formation were conducted using the geologic model described above (Figure A-9). Simulations were carried out using CMG's GEM, a compositional reservoir simulation module. Both calculated temperature and pressure, along with the reference datum depth, were used to initialize the reservoir equilibrium conditions for performing numerical simulation. A compositional simulator is one of the most mechanistically accurate methods to solve compositional multiphase fluid flow processes. Compositional simulators utilize cubic equations of state, such as Peng–Robinson's, which calculates thermal dynamic properties of fluids within the reservoir, including the resulting mixture of fluids when CO₂ is injected into the saline formation. During the simulation process for this study, the compositional EOS (equation of state) simulator accounts for and estimates CO₂ solubility, residual gas trapping, and flow dynamics through a duration of time.

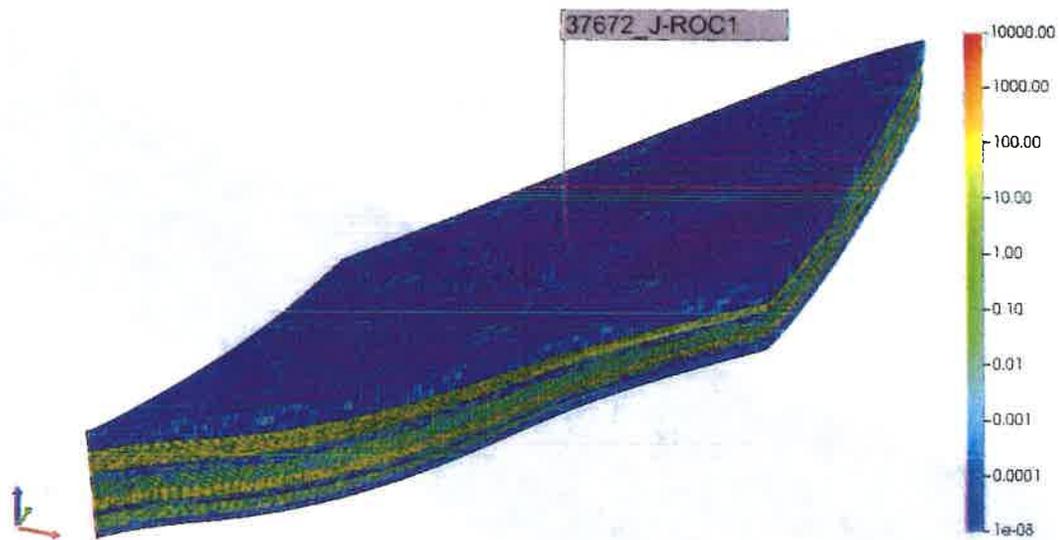


Figure A-9. The 3D view of the simulation model with the permeability property displayed. Note the low-permeability layers (dark blue) at the top and bottom of the figure. These layers represent the Icebox Formation (upper) and the Precambrian basement (lower). The varied permeability of the Black Island and Deadwood Formations is observed in between these layers. Vertical exaggeration is 40×.

The simulation model boundaries were assigned infinite-acting conditions to allow lateral water flux and pressure dispersion through the simulated-boundary aquifer. The reservoir was assumed to be 100% brine saturated with an initial formation salinity of 256,000 ppm total dissolved solids (TDS). Simulations performed allowed CO₂ to dissolve into the native formation brine. Both the relative permeability and the capillary pressure data for the Deadwood were analyzed and generated for three representative rock types in the simulation (sandstone/siltstone, shale/granite, and carbonate/dolostone) through Core Labs MICP evaluation and Energy & Environmental Research Center (EERC) laboratory analysis (Figures A-10 through A-12). The MICP-measured capillary pressures were adjusted to CO₂-brine pressures based on theoretical predictions of CO₂-brine contact angles and interfacial tensions. These CO₂-brine capillary pressures were further adjusted to account for the simulation-predicted average porosity and permeability compared to the MICP sample measured porosity and permeability.

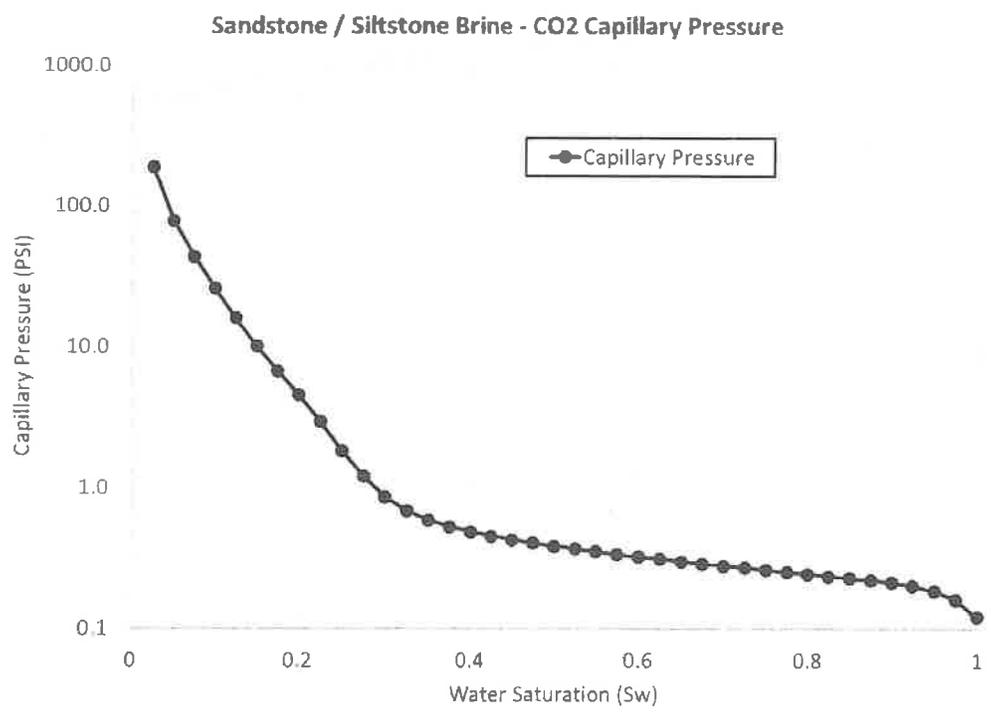
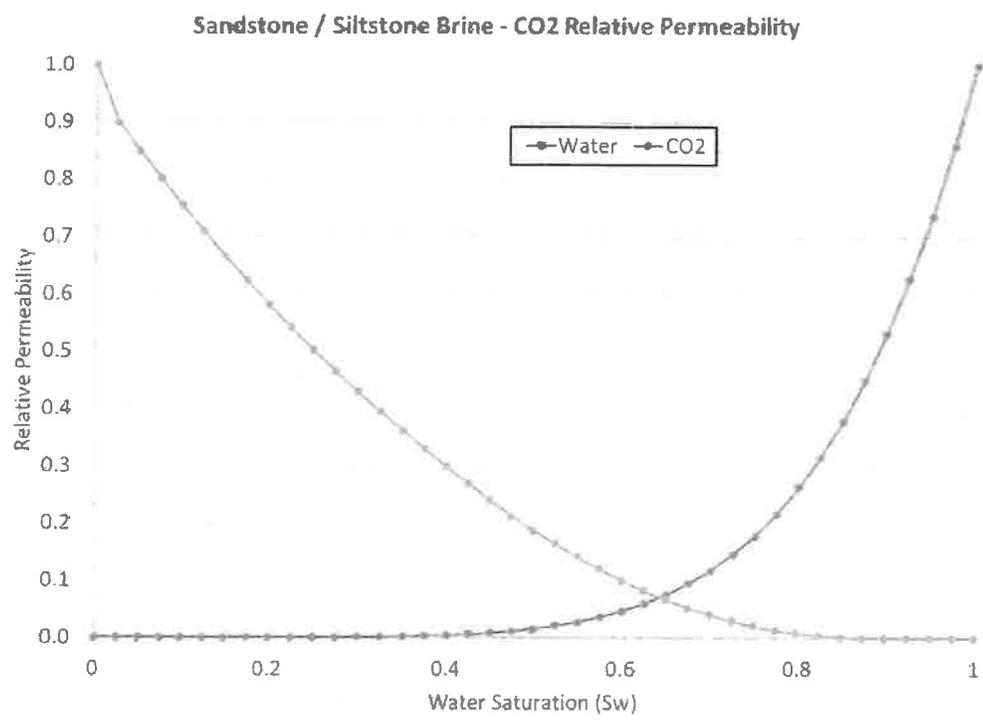


Figure A-10. Relative permeability (top) and capillary pressure curves (bottom) for the sandstone and siltstone rock types in the Black Island and Deadwood Formations.

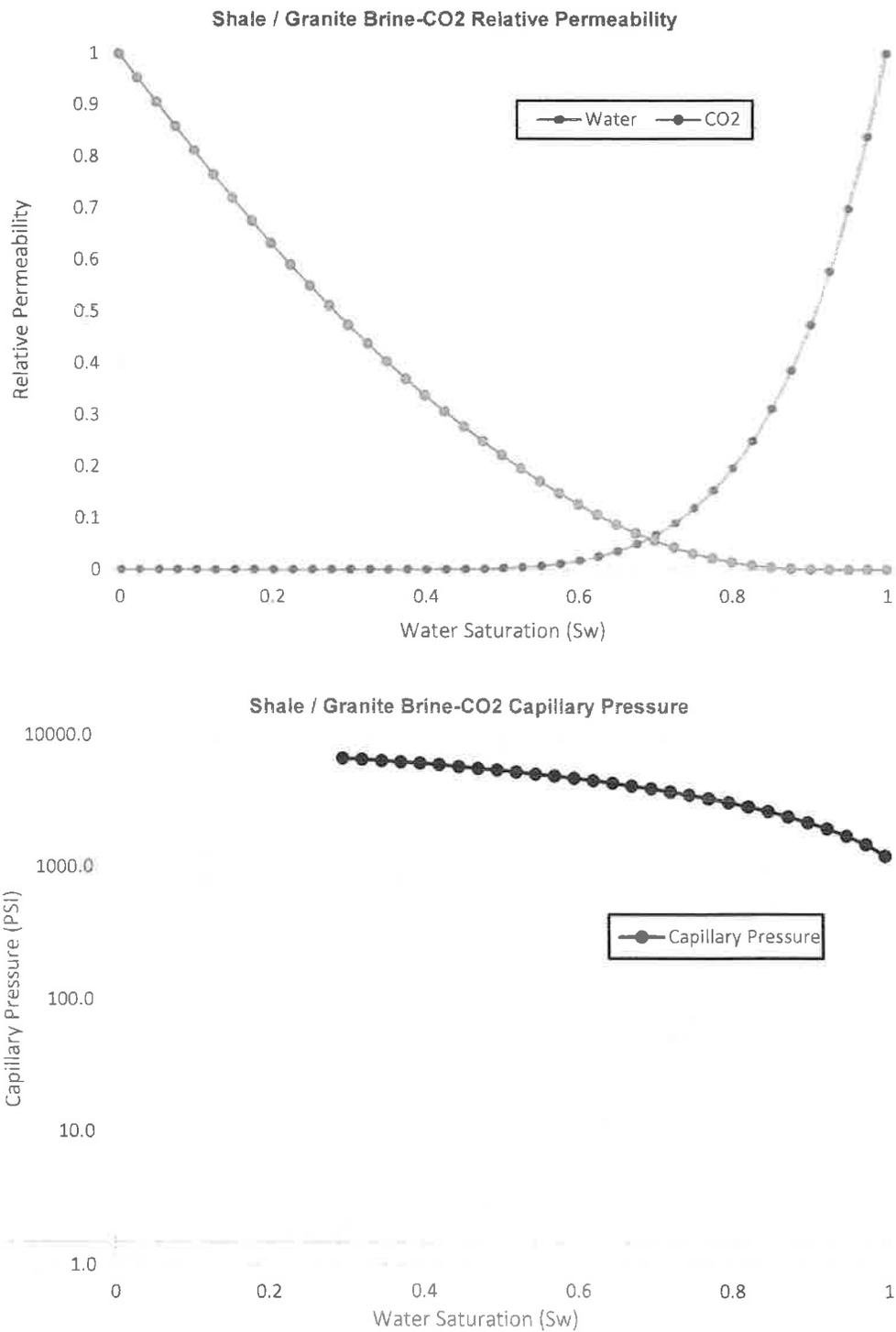


Figure A-11. Relative permeability (top) and capillary pressure curves (bottom) for the shale in the Icebox, Black Island, and Deadwood Formations and for the Granite in Precambrian.

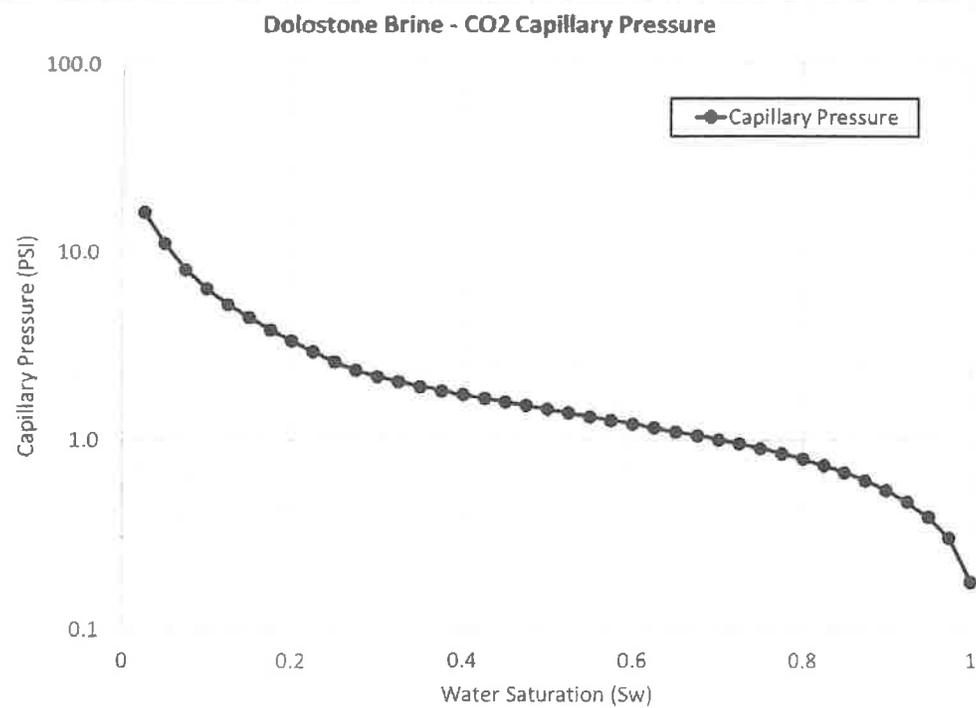
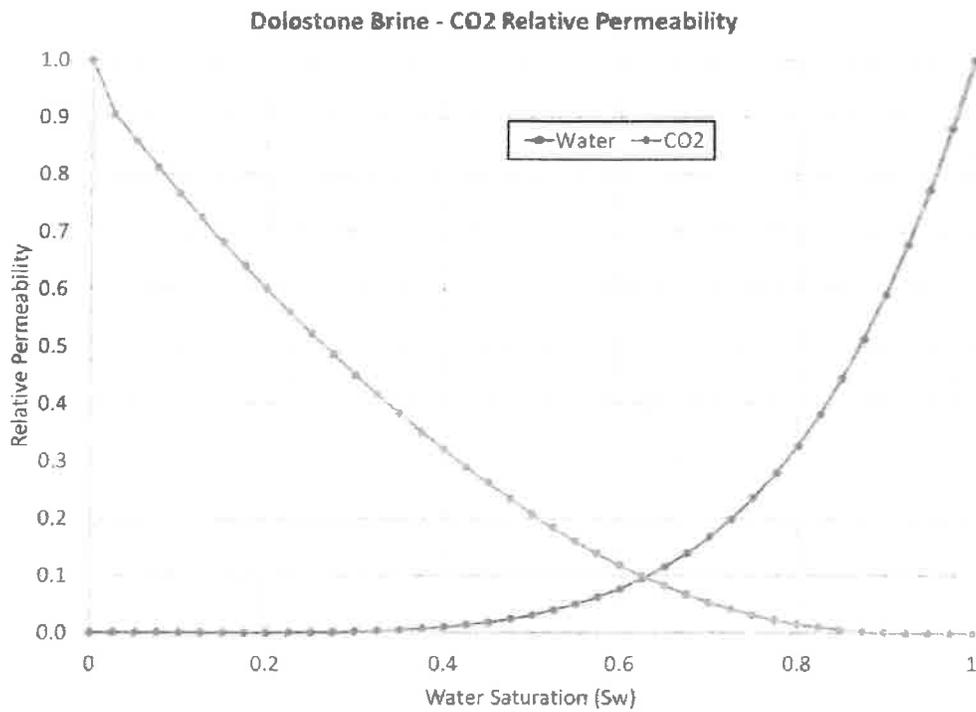


Figure A-12. Relative permeability (top) and capillary pressure curves (bottom) for the carbonate/dolostone rock type in the Black Island and Deadwood Formations.

Capillary entry pressure data included in the dynamic reservoir simulation model were derived from core testing. The capillary entry pressure value applied to the Ice Box shale layers in the model was determined by deriving a ratio between the reservoir quality index of Ice Box core samples and modelled properties to scale the capillary entry pressure value derived from core testing (Table A-1). The capillary entry pressure value derived from core sample testing, 0.16 psi, was applied to the Deadwood and Black Island sand lithologies in the model. A core sample was not collected from carbonate intervals in the Deadwood and Black Island, so capillary entry pressure data from Broom Creek carbonate samples was applied to the carbonate lithologies in the model in combination with a multiplication factor derived from the ratio of reservoir quality index between the core sample and modelled properties (Table A-1). Samples tested within the Deadwood and Black Island Formation included sandstone, shaly sandstone and shaly arkose lithologies. Therefore, the capillary entry pressure values from the Ice Box shale were used for the Deadwood and Black Island shale lithologies in the simulation model.

Table A-1. Core and Model Properties Showing the Multiplication Factor Used to Calculate Capillary Entry Pressure Used in the Model

Formation	Core			Model			
	Phi (fraction)	K, md	Capillary Entry Pressure, psi	Phi (fraction)	K, md	Capillary Entry Pressure, psi	Multiplication Factor
Deadwood and Black Island (carbonate)	0.048	0.00478	27	0.050**	39.3**	0.3	0.011
Icebox (shale)	0.036	0.00002	845	0.008***	1.45E-06***	1450*	1.75

* Maximum value allowed in CMG is 1450 psi, the scaled capillary entry pressure (1480 psi) exceeded this.

** Pore volume weighted average.

*** Pore volume weighted average of Icebox shale and Precambrian used to calculate multiplication factor.

Temperature data recorded from logging the J-LOC1 wellbore were used to derive a temperature gradient of 0.01°F/ft for the proposed injection site. In combination with depth, this temperature gradient was used to calculate subsurface temperatures throughout the geologic model of the study area. Pressure testing within the J-LOC1 well was performed with a modular formation dynamics tester (MDT) logging tool. Multiple pressure readings recorded from the Black Island and Deadwood Formations were used to derive a pore pressure gradient of 0.46 psi/ft (Table A-2). Combined with depth, this gradient was used to distribute pressure throughout the geologic model.

Table A-2. MDT Pressure Measurements Recorded from the J-LOC1 Well and Derived Formation Pressure Gradients

Test Depth, ft MD*	Formation Pressure, psi	Formation Pressure Gradient, psi/ft
9,800	4,507	0.46
9,885	4,548	0.46
9,885	4,548	0.46
10,087	4,651	0.46
10,254	4,734	0.46

* Measured depth.

Simulation model permeability was tuned globally by applying a multiplier to match reservoir properties estimated from a Deadwood Formation step rate test. Permeability multipliers were calculated by dividing the average permeability estimated from the injection test by the average model permeability over a certain distance from the J-LOC1 well. Using the model permeability averaged over a distance of approximately 750–1,250 ft from J-LOC1 and comparing it with the average permeability based on the injection test, the estimated multipliers ranged from 3.5–7.1×, with an average value of nearly 5×. Ultimately, a global multiplier of 5× was applied to the permeability properties before numerical simulations.

Table A-3 shows the general properties used for numerical simulation analysis in this study. The injection well, J-ROC1, is simulated as perforated across the entire Black Island Formation interval and across the Deadwood intervals C through E (the lowest two Deadwood intervals, A and B, were not perforated). The J-ROC1 well constraints and wellbore model inputs for the simulation model are shown in Table A-4.

Table A-3. Summary of Reservoir Properties in the Simulation Model

Average Permeability, mD	Average Porosity, %	Initial Pressure, P _i , psi	Salinity, ppm	Boundary Condition
Icebox: 7.25×10^{-7}	Icebox: ~0.12	~4,548.42	256,000	Open (infinite-acting)
Black Island: 9.81	Black Island: ~5.48			
Deadwood: 31.65	Deadwood: ~3.81			
Precambrian: 7.88×10^{-7}	Precambrian: ~0.74			

Table A-4. Well Constraints and Wellbore Model in the Simulation Model

Primary Constraint, Wellhead Pressure	Secondary Constraint, Bottomhole Injection Pressure	Tubing Size	Wellhead Temperature	Downhole Temperature
2,800 psi	6,179 psi	5.5 in.	90°F	181°F

Simulation Results

Simulations of CO₂ injection with the given well constraints, listed in Table A-4, predicted that the injection bottomhole pressure (BHP) will not exceed 6,179 psi during injection operations, assuming a wellhead pressure (WHP) limit of 2,800 psi (Figure A-13). Results of a stress test performed by an MDT tool in the J-LOC1 wellbore, conducted at a depth of 9,885.1 ft MD, estimated a fracture closure pressure of 7,417 psi, resulting in a fracture closure gradient of 0.750 psi/ft. The closure pressure gradient was used to calculate maximum BHP constraints, based upon 90% of the fracture closure pressure. Cumulative CO₂ injection at the above-described pressure conditions was approximately 23.4 million metric tons (MMt) over the 20 years of injection. The resulting average injection rate of CO₂ injected into the Black Island and Deadwood Formations over the 20 years of simulated injection was 1.17 MMt per year (Figure A-14).

During and after injection, free-phase (supercritical) CO₂ accounts for the majority of CO₂ observed in the model's pore space, but the mass of free-phase CO₂ declines during the postinjection period. Throughout the injection operation, a portion of the free-phase CO₂ is trapped in the formation's pores through a process known as residual trapping. Residual trapping can occur as a function of low CO₂ saturation and inability to flow under the effects of relative permeability. CO₂ also dissolves into the formation brine throughout injection operations (and continues afterward), although the rate of dissolution slows over time. The relative portions of free-phase, trapped, and dissolved CO₂ can be tracked throughout the duration of the simulation (Figure A-15).

The pressure plume shown in Figure A-16 shows the distribution of pressure increase in the Deadwood Formation during the 20-year injection period. Figure A-16 shows the average increase in pressure after 20 years of injection. The largest increase will appear in the near-wellbore area, where the maximum increase of 1,620 psi is estimated.

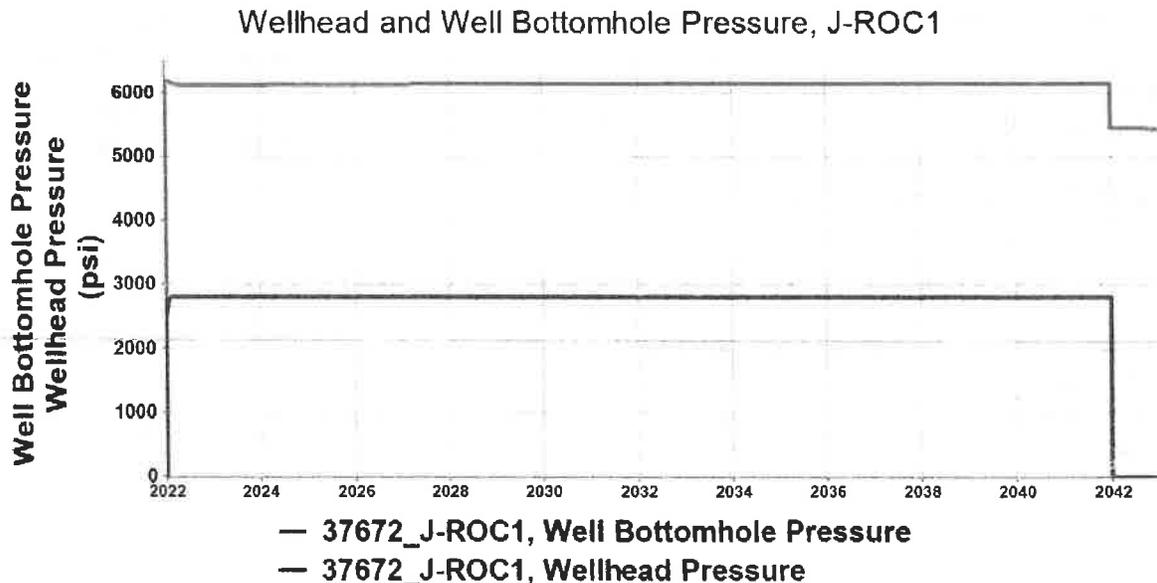


Figure A-13. WHP and BHP response with the expected injection rate.

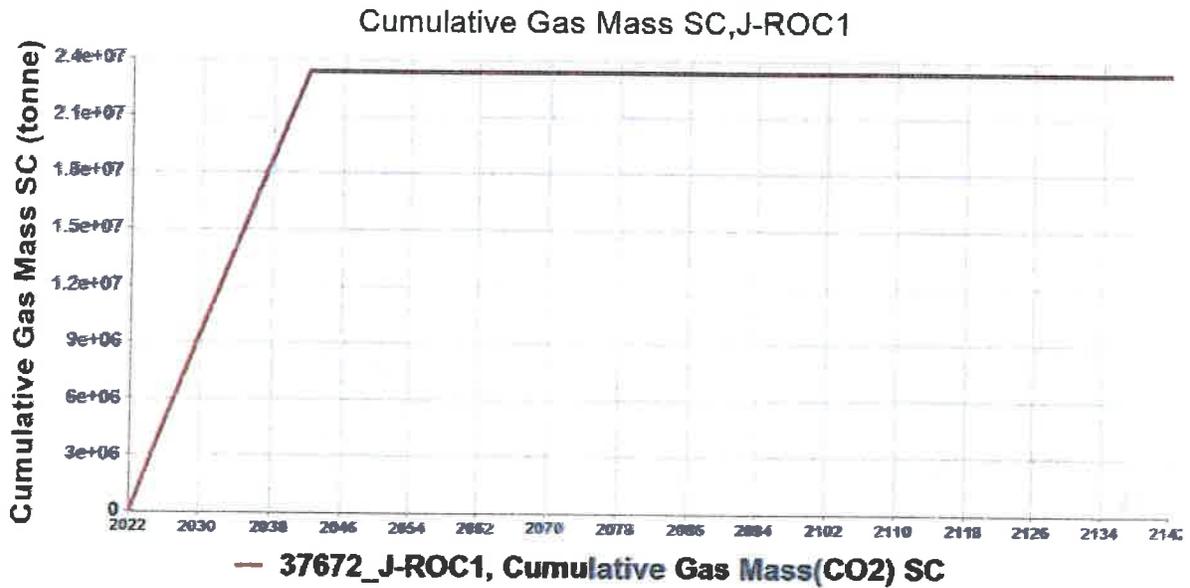


Figure A-14. Cumulative injected gas mass over 20 years of injection.

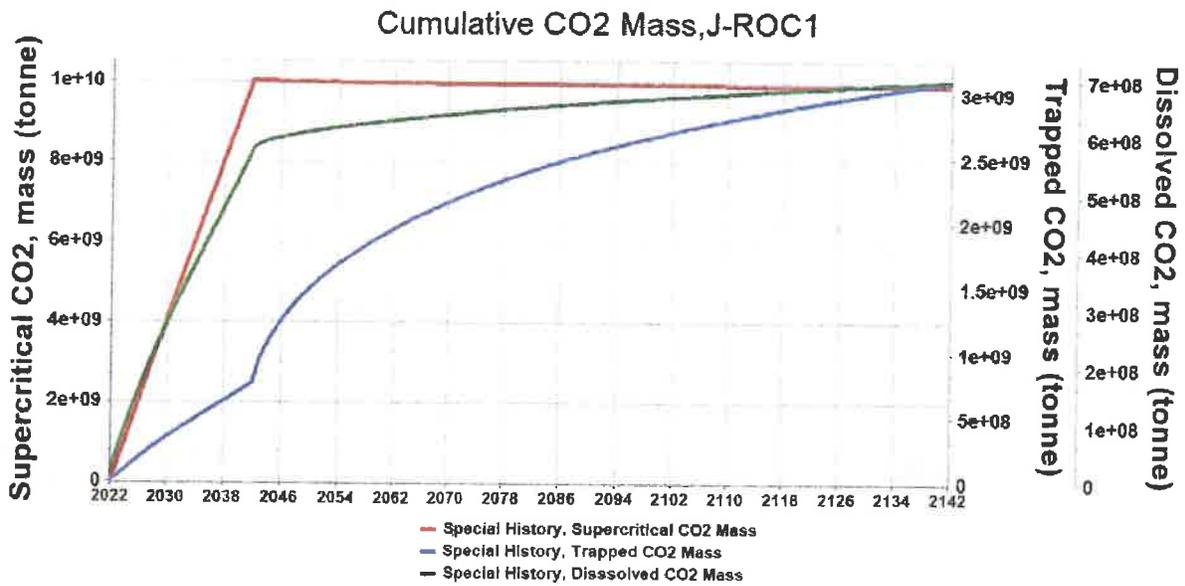


Figure A-15. Simulated total dissolved CO₂ in brine, supercritical-phase CO₂, and residually trapped CO₂.

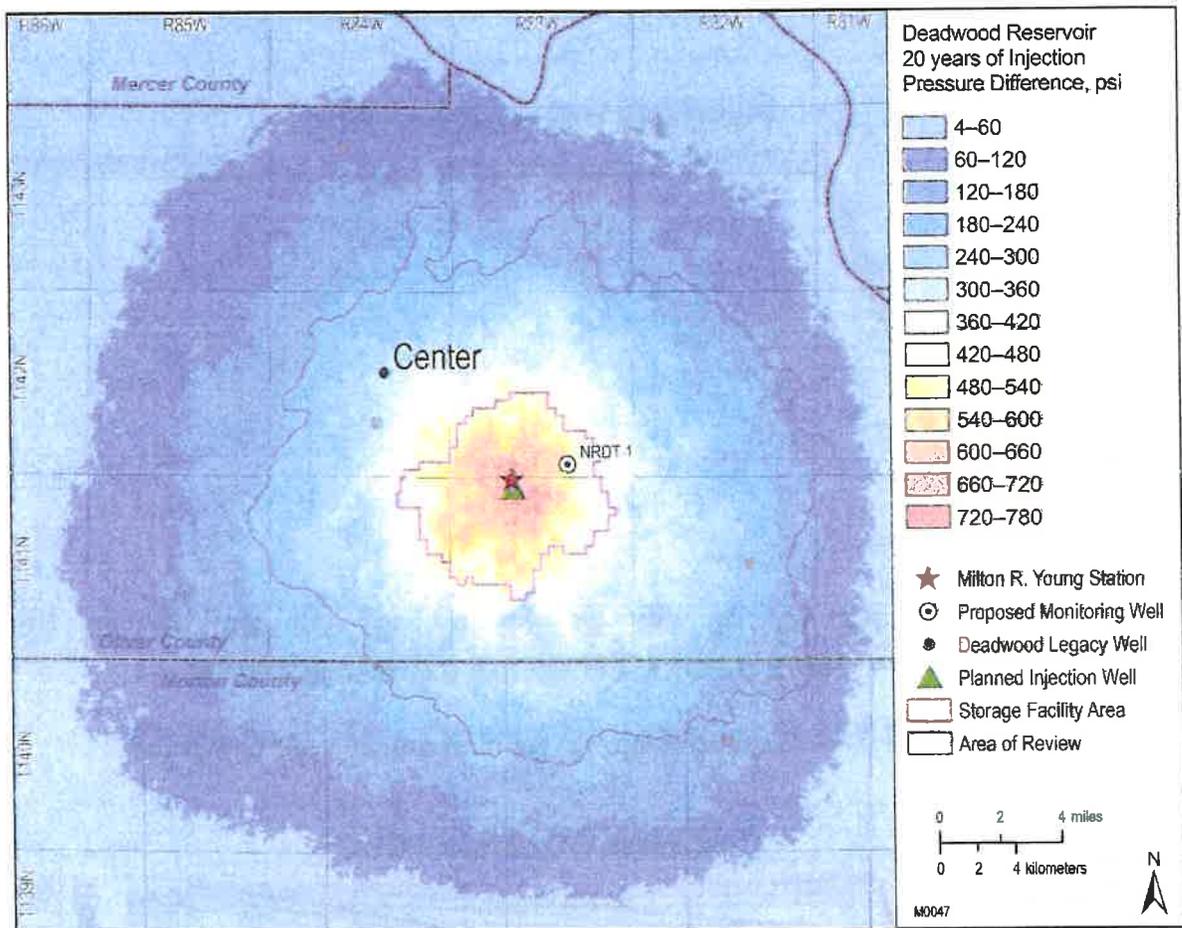


Figure A-16. Average pressure increase within the Deadwood Formation at the end of a simulated 20-year CO₂ injection operation.

Long-term CO₂ migration potential was also investigated through the numerical simulation efforts. The slow lateral migration of the plume is caused by the effects of buoyancy where the free-phase CO₂ injected into the formation rises to the cap rock or lower-permeability layers present in the Black Island and Deadwood Formations and then outward. This process results in a higher concentration of CO₂ at the center which gradually spreads out toward the model edges where the CO₂ saturation is lower. Figures A-17 and A-18 show the gas saturation changes between the end of injection and 20 years postinjection in the cross-sectional view.

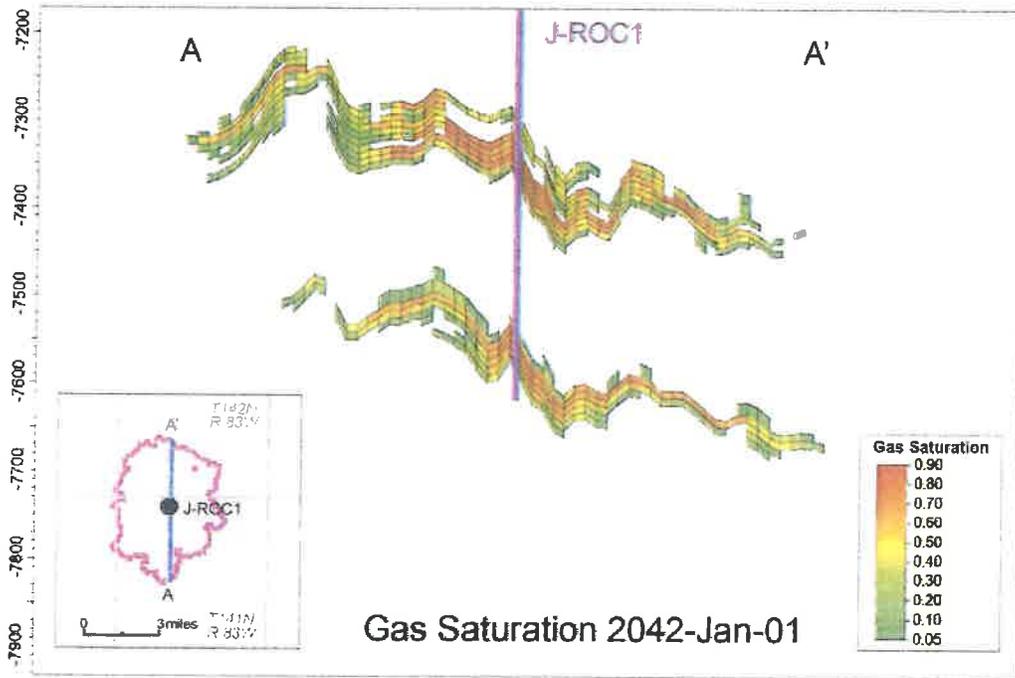


Figure A-17. CO₂ plume boundary and cross section at the end of injection displayed south to north through the J-ROC1 well.

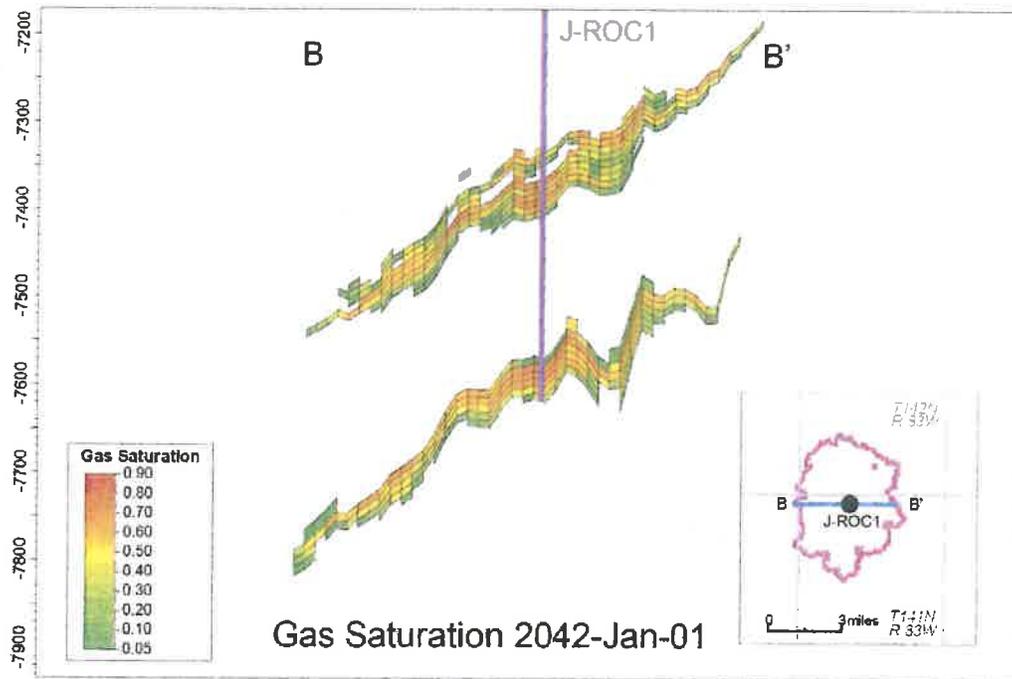


Figure A-18. CO₂ plume boundary and cross section at the end of injection displayed east to west through the J-ROC1 well.

Maximum Surface Injection Pressure

Injectivity in the Deadwood Formation is limited by the WHP and BHP constraints (90% of fracture closure pressure). The initial WHP of 1,700 psi was not sufficient to maximize injectivity while staying significantly below the maximum BHP constraint. An initial feasibility investigation by project partners suggested a step-up to the next compressor capacity (outlet pressure of 2,800 psi) is required to increase injection rate in Deadwood while staying at or below the maximum BHP. A WHP (surface) of 2,800 psi was considered to maximize injection in the simulation model.

The maximum surface pressure was reached in the simulations before the maximum BHP was encountered. At the maximum surface pressure of 2,800 psi, the peak predicted BHP response was observed to be 6,179 psi with an average of 6,139 psi as the BHP remains lower than the maximum BHP of 6,179 psi for most of the injection period (Figure A-19).

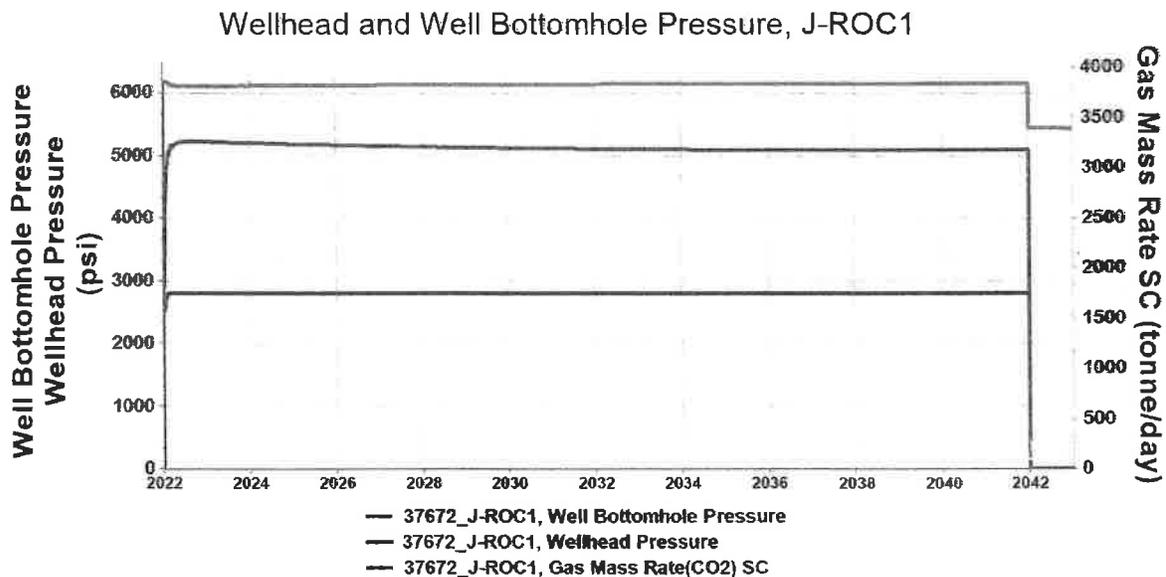


Figure A-19. Maximum pressure and rate response when the well is operated at its maximum safety rating, using 5.5-in. tubing.

DELINEATION OF THE AREA OF REVIEW

The AOR is defined as the region surrounding the geologic storage project where USDWs may be endangered by CO₂ injection activity (North Dakota Administrative Code [NDAC] § 43-05-01-05). The primary endangerment risk is due to the potential for vertical migration of CO₂ and/or formation fluids to a USDW from the storage reservoir. Therefore, the AOR encompasses the region overlying the extent of reservoir fluid pressure increase sufficient to drive formation fluids (e.g., brine) into a USDW, assuming pathways for this migration (e.g., abandoned wells or fractures) are present. The minimum pressure increase in the reservoir that results in a sustained flow of brine upward into an overlying drinking water aquifer is referred to as the “critical threshold pressure increase” and the resultant pressure as the “critical threshold pressure.” The

U.S. Environmental Protection Agency (EPA) guidance for AOR delineation under the Underground Injection Control (UIC) Program for Class VI wells provides several methods for estimating the critical threshold pressure increase and the resulting critical threshold pressure.

EPA (2013) Method 1 (*pressure front based on bringing injection zone and USDW to equivalent hydraulic heads*) is presented as a method for determining whether a storage reservoir is in hydrostatic equilibrium with the lowest USDW (Thornhill and others, 1982). Under Method 1, the increase in pressure (ΔP) that may be sustained in the injection zone (critical pressure threshold) is given by:

$$\Delta P_{i,f} = P_u + \rho_i g \cdot (z_u - z_i) - P_i \quad [\text{Eq. 1}]$$

where P_u is the initial fluid pressure in the USDW, ρ_i is the storage reservoir fluid density (mg/m^3), g is the acceleration due to gravity (m/s^2), z_u is the representative elevation of the USDW (m amsl), z_i is the representative elevation of the injection zone (m amsl), P_i is the initial pressure in the injection zone (Pa), and $\Delta P_{i,f}$ is the critical pressure threshold.

Equation 1 assumes that the hypothetical open borehole is perforated exclusively within the injection zone and USDW. If $\Delta P_{i,f} = 0$, then the reservoir and USDW are in hydrostatic equilibrium; if $\Delta P_{i,f} > 0$, then the reservoir is underpressurized relative to the USDW, and if $\Delta P_{i,f} < 0$, then the reservoir is overpressurized relative to the USDW. In the case of $\Delta P_{i,f} > 0$, the value of $\Delta P_{i,f}$ represents the amount of pressure increase that can be accommodated in the storage reservoir before brine would flow into the lowest USDW.

Critical Threshold Pressure Increase Estimation at J-ROC1

For the purposes of delineating the $\Delta P_{i,f}$ for the Tundra SGS study area, constant fluid densities for the lowermost USDW (the Fox Hills Formation) and the injection zone (the Deadwood Formation) were used. A density of $1,001 \text{ kg/m}^3$ was used to represent the USDW fluids, and a density of $1,177 \text{ kg/m}^3$, which is estimated based on the in situ brine salinity, temperature, and pressure, was used to represent injection zone fluids.

Critical pressure threshold increases were calculated for the proposed storage reservoir at a range of depths across the reservoir using Equation 1, formation depths and thicknesses from J-ROC1, and fluid density values from the nearby J-LOC1 stratigraphic test well (Table A-5). Using this method, the critical threshold pressure increase ($\Delta P_{i,f}$) at the top of the Deadwood Formation at the J-ROC1 well was determined to be 127 psi. Because $\Delta P_{i,f} > 0$, the value of $\Delta P_{i,f}$ represents the amount of pressure increase that can be accommodated in the storage reservoir before brine would flow into the lowest USDW.

Calculations of critical threshold pressure increase were compared to potential pressure increases within the storage facility area that would result from CO_2 injection and the potential lateral extent of the injection fluid as determined by predictive simulations. Table A-5 provides estimates of $\Delta P_{i,f}$ for various depths within the Deadwood Formation at J-ROC1. The same calculations were applied to the geologic model to determine $\Delta P_{i,f}$ for each cell, values from which were then compared against the difference in pressure predicted for each cell in the simulation

Table A-5. EPA Method 1 Critical Threshold Pressure Increase Calculated at the J-ROC1 Wellbore Location

Depth,*		P_i	P_u	ρ_i	Z_u	Z_i	$\Delta P_{i,f}$	
		Injection Zone Pressure, MPa	USDW Pressure, MPa	Injection Zone Density, kg/m ³	USDW Base Elevation, m amsl	Reservoir Elevation, m amsl	Threshold Pressure Increase, MPa	psi
9,154	2,790	30.850	3.535	1,177	266	-2174	0.88	127
9,407	2,867	31.703	3.535	1,177	266	-2251	0.90	130
9,660	2,944	32.556	3.535	1,177	266	-2328	0.92	133

* Chosen depths represent the top, middle, and base of the Deadwood Formation at J-ROC1. Ground surface elevation is 609 m above mean sea level.

model at the end of injection (time of greatest increase in pressure since the beginning of simulated injection). A defined area of the simulation model around the injection well displays a 20-year pressure increase (ΔP) that is greater than the calculated $\Delta P_{i,f}$ for the cells in that area. The boundary between where $\Delta P_{i,f} > \Delta P$ and where $\Delta P_{i,f} < \Delta P$ delineates the line of critical threshold pressure increase and must be accounted for—in conjunction with the CO₂ areal extent—when determining AOR.

The storage reservoir is the maximum extent of the injected CO₂ or the maximum extent of the critical pressure, whichever is greater. At Tundra SGS, the line of critical threshold pressure increase plus 1 mile is the AOR, because the maximum extent of critical pressure is larger than the maximum extent of the injected CO₂. As shown in Figure A-20, the AOR is depicted by the gray shaded area, which includes the storage facility area (purple shaded area). Figure A-21 illustrates the land use within the AOR.

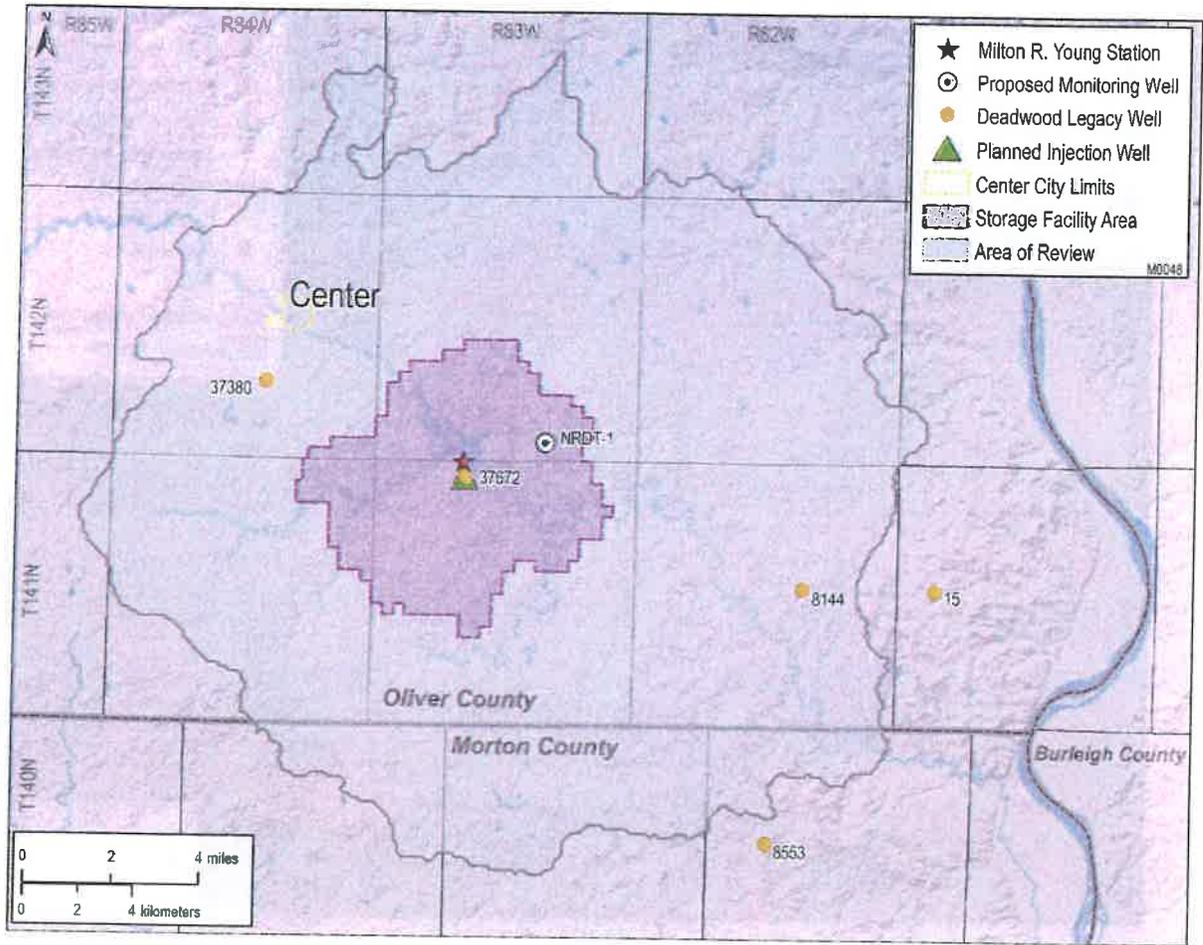


Figure A-20. Final AOR estimations of the Tundra SGS storage facility area in relation to nearby legacy wells. Shown is the storage facility area (purple boundary and shaded area), area of review (gray boundary and shaded area), and Center city limits (dotted yellow boundary). Orange circles represent legacy wells near the storage facility area.

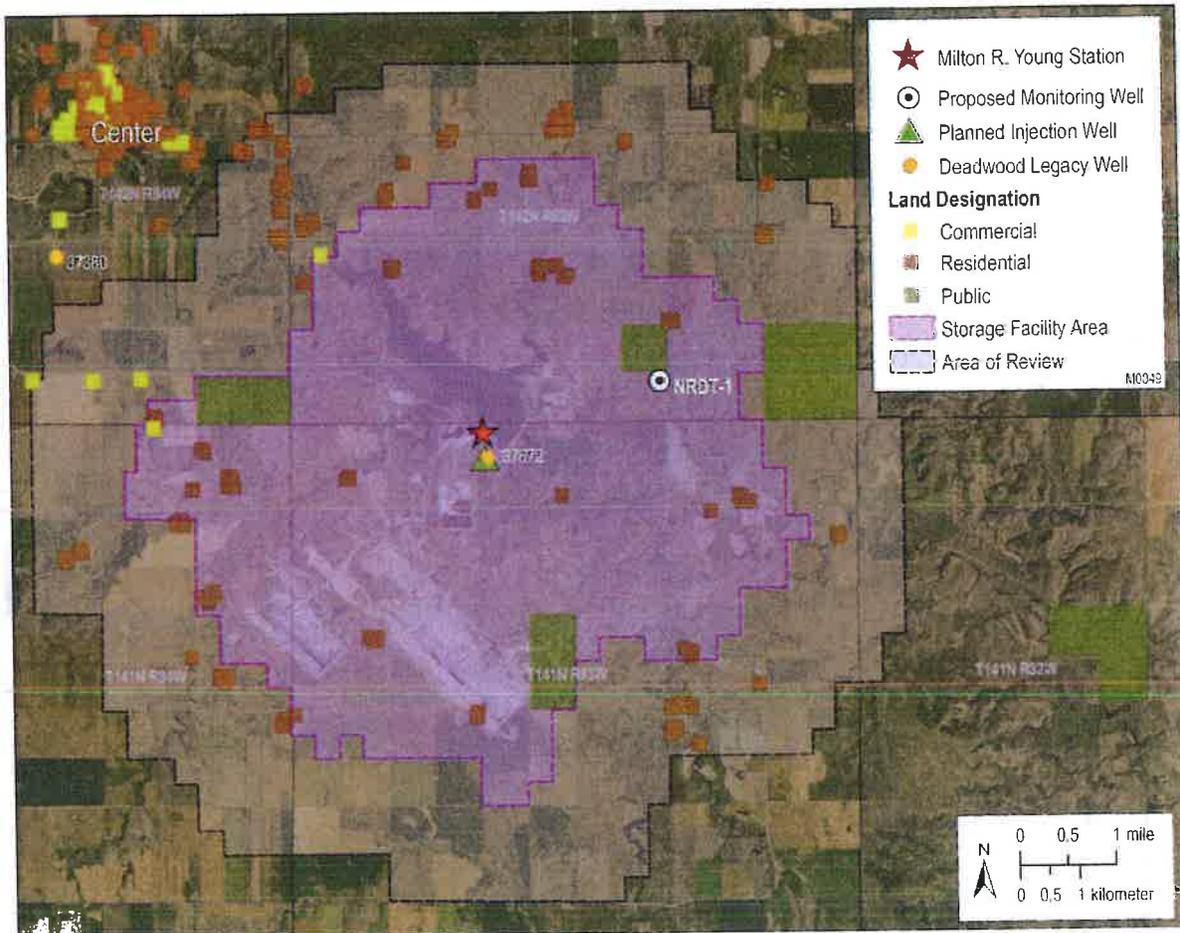


Figure A-21. Land use in and around the AOR of the Tundra SGS storage facility.

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APPENDIX B

**WELL AND WELL FORMATION FLUID-
SAMPLING LABORATORY
ANALYSIS**

ANALYTICAL RESEARCH LAB - Final Results
Set Number: 54654

Request Date: Thursday, June 18, 2020

Fund#: 25089

Due Date: Thursday, July 2, 2020

July 24, 2020
PI: Lonny Jacobson

Set Description: Minnkota JLOC 1 Well-MDT Fluid
 Sampling June 2020

Contact Person: Lonny Jacobson

Sample	Parameter	Result
54654-05	Deadwood 6/13/20	
	Alkalinity, as Bicarbonate (HCO ₃ ⁻)	33.1 mg/L
	Alkalinity, as Carbonate (CO ₃ ⁼)	0 mg/L
	Alkalinity, as Hydroxide (OH ⁻)	0 mg/L
	Alkalinity, Total as CaCO ₃	27.2 mg/L
	Aluminum	< 1000 µg/L
	Antimony	< 5 µg/L
	Arsenic	< 5 µg/L
	Barium	2990 µg/L
	Beryllium	< 4 µg/L
	Bismuth	< 5 µg/L
	Boron	54.0 mg/L
	Bromide	278 mg/L
	Cadmium	< 2 µg/L
	Calcium	8340 mg/L
	Chloride	153000 mg/L
	Chromium	< 40 µg/L
	Cobalt	< 20 µg/L
	Conductivity at 25°C	236000 µS/cm
	Copper	< 200 µg/L
	Dissolved Inorganic Carbon	5.9 mg/L
	Dissolved Organic Carbon	1010 mg/L
	Fluoride	< 5 mg/L
	Iron	25.2 mg/L
	Lead	93 µg/L
	Lithium	41.3 mg/L
	Magnesium	1260 mg/L
	Manganese	3300 µg/L
	Mercury	< 0.3 µg/L
	Molybdenum	< 25 µg/L
	Nickel	< 40 µg/L
	Phosphorus	< 10 mg/L
	Potassium	1800 mg/L
	Selenium	< 5 µg/L
	Silicon	< 10 mg/L

Distribution _____ Date _____

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PI: Lonny Jacobson

Set Description: Minnkota JLOC 1 Well-MDT Fluid
Sampling June 2020

Contact Person: Lonny Jacobson

Sample	Parameter	Result
54654-05	Deadwood 6/13/20	
	Silver	< 5 µg/L
	Sodium	91000 mg/L
	Strontium	248 mg/L
	Sulfate	504 mg/L
	Thallium	51 µg/L
	Thorium	< 10 µg/L
	Total Dissolved Solids	256000 mg/L
	Total Inorganic Carbon	12.1 mg/L
	Total Organic Carbon	1060 mg/L
	Uranium	< 5 µg/L
	Vanadium	< 20 µg/L
	Zinc	0.987 mg/L
54654-06	Deadwood 6/13/20 duplicate	
	Alkalinity, as Bicarbonate (HCO ₃ ⁻)	32.5 mg/L
	Alkalinity, as Carbonate (CO ₃ ⁼)	0 mg/L
	Alkalinity, as Hydroxide (OH ⁻)	0 mg/L
	Alkalinity, Total as CaCO ₃	26.7 mg/L
	Aluminum	< 1000 µg/L
	Antimony	< 5 µg/L
	Arsenic	< 5 µg/L
	Barium	2940 µg/L
	Beryllium	< 4 µg/L
	Bismuth	< 5 µg/L
	Boron	52.6 mg/L
	Bromide	283 mg/L
	Cadmium	< 2 µg/L
	Calcium	8350 mg/L
	Chloride	155000 mg/L
	Chromium	< 40 µg/L
	Cobalt	< 20 µg/L
	Conductivity at 25°C	236000 µS/cm
	Copper	< 200 µg/L

Distribution _____ Date _____

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Fund#: 25089

Due Date: Thursday, July 2, 2020

PI: Lonny Jacobson

Set Description: Minnkota JLOC 1 Well-MDT Fluid
Sampling June 2020

Contact Person: Lonny Jacobson

Sample	Parameter	Result
54654-06	Deadwood 6/13/20 duplicate	
	Dissolved Inorganic Carbon	6.0 mg/L
	Dissolved Organic Carbon	1000 mg/L
	Fluoride	< 5 mg/L
	Iron	24.7 mg/L
	Lead	93 µg/L
	Lithium	40.8 mg/L
	Magnesium	1240 mg/L
	Manganese	3230 µg/L
	Mercury	< 0.3 µg/L
	Molybdenum	< 25 µg/L
	Nickel	< 40 µg/L
	Phosphorus	< 10 mg/L
	Potassium	1790 mg/L
	Selenium	< 5 µg/L
	Silicon	< 10 mg/L
	Silver	< 5 µg/L
	Sodium	90300 mg/L
	Strontium	247 mg/L
	Sulfate	510 mg/L
	Thallium	52 µg/L
	Thorium	< 10 µg/L
	Total Dissolved Solids	257000 mg/L
	Total Inorganic Carbon	10 mg/L
	Total Organic Carbon	1060 mg/L
	Uranium	< 5 µg/L
	Vanadium	< 20 µg/L
	Zinc	0.887 mg/L

Distribution _____ Date _____

ANALYTICAL RESEARCH LAB - Final Results
Set Number: 54655

Request Date: Thursday, June 18, 2020

July 23, 2020
Fund#: 25089

Due Date: Thursday, July 2, 2020

PI: Lonny Jacobson

Set Description: Minnkota JLOC I Well-MDT Fluid
 Sampling June 2020 (Total Metals)

Contact Person: Lonny Jacobson

Sample	Parameter	Result
54655-05	Deadwood 6/13/20 (Total Metals)	
	Aluminum	< 1000 µg/L
	Antimony	< 5 µg/L
	Arsenic	< 5 µg/L
	Barium	3150 µg/L
	Beryllium	< 4 µg/L
	Bismuth	< 5 µg/L
	Boron	50.3 mg/L
	Cadmium	< 2 µg/L
	Calcium	8060 mg/L
	Chromium	< 40 µg/L
	Cobalt	< 20 µg/L
	Copper	< 200 µg/L
	Iron	22.5 mg/L
	Lead	92 µg/L
	Lithium	40.8 mg/L
	Magnesium	1200 mg/L
	Manganese	3140 µg/L
	Mercury	< 0.3 µg/L
	Molybdenum	< 25 µg/L
	Nickel	< 40 µg/L
	Phosphorus	< 10 mg/L
	Potassium	1740 µg/L
	Selenium	< 5 µg/L
	Silicon	< 10 mg/L

Note: Results are reported on a dry basis, unless otherwise noted.

Distribution _____ Date _____

ANALYTICAL RESEARCH LAB - Final Results

July 23, 2020

Set Number: 54655

Request Date: Thursday, June 18, 2020

Fund#: 25089

Due Date: Thursday, July 2, 2020

PI: Lonny Jacobson

Set Description: Minnkota JLOC 1 Well-MDT Fluid
Sampling June 2020 (Total Metals)

Contact Person: Lonny Jacobson

Sample	Parameter	Result
54655-05	Deadwood 6/13/20 (Total Metals)	
	Silver	< 5 µg/L
	Sodium	88500 mg/L
	Strontium	243 mg/L
	Thallium	51 µg/L
	Thorium	< 10 µg/L
	Uranium	< 5 µg/L
	Vanadium	< 20 µg/L
	Zinc	0.946 mg/L
54655-06	Deadwood 6/13/20 duplicate (Total Metals)	
	Aluminum	< 1000 µg/L
	Antimony	< 5 µg/L
	Arsenic	< 5 µg/L
	Barium	3200 µg/L
	Beryllium	< 4 µg/L
	Bismuth	< 5 µg/L
	Boron	49.2 mg/L
	Cadmium	< 2 µg/L
	Calcium	8210 mg/L
	Chromium	< 40 µg/L
	Cobalt	< 20 µg/L
	Copper	< 200 µg/L
	Iron	22.8 mg/L
	Lead	96 µg/L
	Lithium	41.8 mg/L
	Magnesium	1210 mg/L
	Manganese	3120 µg/L
	Mercury	< 0.3 µg/L
	Molybdenum	< 25 µg/L
	Nickel	< 40 µg/L
	Phosphorus	< 10 mg/L
	Potassium	1770 mg/L
	Selenium	< 5 µg/L

Note: Results are reported on a dry basis, unless otherwise noted.

Distribution _____

Date _____

ANALYTICAL RESEARCH LAB - Final Results

July 23, 2020

Set Number: 54655

Request Date: Thursday, June 18, 2020

Fund#: 25089

Due Date: Thursday, July 2, 2020

PI: Lonny Jacobson

Set Description: Minnkota JLOC 1 Well-MDT Fluid
Sampling June 2020 (Total Metals)

Contact Person: Lonny Jacobson

Sample	Parameter	Result
54655-06	Deadwood 6/13/20 duplicate (Total Metals)	
	Silicon	< 10 mg/L
	Silver	< 5 µg/L
	Sodium	88700 mg/L
	Strontium	241 mg/L
	Thallium	52 µg/L
	Thorium	< 10 µg/L
	Uranium	< 5 µg/L
	Vanadium	< 20 µg/L
	Zinc	1.15 mg/L

Note: Results are reported on a dry basis, unless otherwise noted.

Distribution _____ Date _____

MVTL

MINNESOTA VALLEY TESTING LABORATORIES, INC.

1126 N. Front St. ~ New Ulm, MN 56073 ~ 800-782-3557 ~ Fax 507-359-2890
 2616 E. Broadway Ave. ~ Bismarck, ND 58501 ~ 800-279-6885 ~ Fax 701-258-9724
 51 W. Lincoln Way ~ Nevada, IA 50201 ~ 800-362-0855 ~ Fax 515-382-3885

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AN EQUAL OPPORTUNITY EMPLOYER

Page: 1 of 2

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 Minnkota Power Cooperative
 3401 24th St SW
 Center ND 58530

Report Date: 30 Jun 20
 Lab Number: 20-W1767
 Work Order #: 82-1477
 Account #: 007048
 Date Sampled: 13 Jun 20 10:00
 Date Received: 15 Jun 20 8:00
 Sampled By: MVTL Field Services
 PO #: 203046

Sample Description: Deadwood

Temp at Receipt: 4.2C

	As Received Result		Method RL	Method Reference	Date Analyzed	Analyst
Metal Digestion						
pH	* 6.0	units	N/A	EPA 200.2	15 Jun 20	JD
Conductivity (EC)	201590	umhos/cm	N/A	SM4500 H+ B	15 Jun 20 17:00	HT
pH - Field	5.46	units	NA	SM2510-B	15 Jun 20 17:00	HT
Temperature - Field	21.2	Degrees C	NA	SM 4500 H+ B	13 Jun 20 10:00	JSM
Total Alkalinity	72	mg/l CaCO3	20	SM 2550B	13 Jun 20 10:00	JSM
Phenolphthalein Alk	< 20	mg/l CaCO3	20	SM2320-B	15 Jun 20 17:00	HT
Bicarbonate	72	mg/l CaCO3	20	SM2320-B	15 Jun 20 17:00	HT
Carbonate	< 20	mg/l CaCO3	20	SM2320-B	15 Jun 20 17:00	HT
Hydroxide	< 20	mg/l CaCO3	20	SM2320-B	15 Jun 20 17:00	HT
Conductivity - Field	216320	umhos/cm	1	EPA 120.1	13 Jun 20 10:00	JSM
Total Organic Carbon	14.0	mg/l	0.5	SM5310-C	23 Jun 20 17:34	NAS
Sulfate	491	mg/l	5.00	ASTM D516-11	17 Jun 20 11:38	EV
Chloride	17500	mg/l	1.0	SM4500-Cl-E	17 Jun 20 9:50	EV
Nitrate-Nitrite as N	< 0.1	mg/l	0.10	EPA 353.2	18 Jun 20 8:37	EV
Ammonia-Nitrogen as N	60.4	mg/l	0.20	EPA 350.1	16 Jun 20 11:40	EV
Mercury - Dissolved	< 0.0002	mg/l	0.0002	EPA 245.1	18 Jun 20 12:37	MDE
Total Dissolved Solids	256000	mg/l	10	I1750-85	17 Jun 20 15:53	HT
Calcium - Total	8610	mg/l	1.0	6010D	16 Jun 20 13:25	MDE
Magnesium - Total	1210	mg/l	1.0	6010D	16 Jun 20 13:25	MDE
Sodium - Total	87000	mg/l	1.0	6010D	16 Jun 20 13:25	MDE
Potassium - Total	2020	mg/l	1.0	6010D	16 Jun 20 13:25	MDE
Iron - Total	22.2	mg/l	0.10	6010D	24 Jun 20 11:07	MDE
Manganese - Total	2.85	mg/l	0.05	6010D	24 Jun 20 11:07	MDE
Barium - Dissolved	< 5 @	mg/l	0.10	6010D	23 Jun 20 12:02	SZ

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

@ = Due to sample matrix # = Due to concentration of other analytes
 ! = Due to sample quantity + = Due to internal standard response

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MVTL

MVTL guarantees the accuracy of the analysis done on the sample submitted for testing. It is not possible for MVTL to guarantee that a test result obtained on a particular sample will be the same on any other sample unless all conditions affecting the sample are the same, including sampling by MVTL. As a mutual protection to clients, the public and ourselves, all reports are submitted as the confidential property of clients, and authorization for publication of statements, conclusions or extracts from or regarding our reports is reserved pending our written approval.

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Page: 2 of 2

Jennifer Altendorf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 30 Jun 20
Lab Number: 20-W1767
Work Order #: 82-1477
Account #: 007048
Date Sampled: 13 Jun 20 10:00
Date Received: 15 Jun 20 8:00
Sampled By: MVTL Field Services
PO #: 203046

Sample Description: Deadwood

Temp at Receipt: 4.2C

	As Received Result		Method RL	Method Reference	Date Analyzed	Analyst
Copper - Dissolved	< 2.5 @	mg/l	0.05	6010D	23 Jun 20 12:02	SZ
Molybdenum - Dissolved	< 5 @	mg/l	0.10	6010D	23 Jun 20 12:02	SZ
Strontium - Dissolved	246	mg/l	0.10	6010D	23 Jun 20 12:02	SZ
Arsenic - Dissolved	< 0.04 @	mg/l	0.0020	6020B	15 Jun 20 16:05	MDE
Cadmium - Dissolved	0.0247	mg/l	0.0005	6020B	16 Jun 20 12:21	MDE
Chromium - Dissolved	< 0.04 @	mg/l	0.0020	6020B	15 Jun 20 16:05	MDE
Lead - Dissolved	0.0836	mg/l	0.0005	6020B	15 Jun 20 16:05	MDE
Selenium - Dissolved	< 0.1 @	mg/l	0.0050	6020B	15 Jun 20 16:05	MDE
Silver - Dissolved	< 0.02 @	mg/l	0.0005	6020B	16 Jun 20 12:21	MDE

* Holding time exceeded

Approved by:

Claudette K Carroll

Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

@ = Due to sample matrix
! = Due to sample quantity

= Due to concentration of other analytes
+ = Due to internal standard response

CERTIFICATION: ND # ND-00016

APPENDIX C

**NEAR-SURFACE MONITORING PARAMETERS
AND BASELINE DATA**

C1. Near-Surface Monitoring: Groundwater and Soil Gas

Near-surface sampling discussed herein comprises 1) sampling of shallow groundwater aquifers (underground sources of drinking water [USDW]) and 2) sampling of soil gas in the shallow vadose zone. Sampling and chemical analysis of these zones provide concentrations of chemical constituents, including carbon dioxide (CO₂), which are focused on detecting movement of the CO₂ out of the reservoir. Ultimately, these monitoring efforts will provide data to confirm that near-surface environments are not adversely impacted by CO₂ injection and storage operations.

C1-1. Groundwater Analysis Protocol

Baseline Groundwater Wells

Two laboratories will be used to analyze the water samples: 1) Minnesota Valley Testing Laboratories, Inc. (MVTL) for general parameters, anions, cations, metals (dissolved and total), and nonmetals (Tables C-1 and C-2) and 2) Isotech Laboratories, Inc., for isotopic signatures (Table C-3).

Table C-1. Measurements of General Parameters for Groundwater Samples

Parameter	Method
Alkalinity	SM ¹ 2320B
Bromide	EPA ² 300.0
Chloride	EPA 300.0
Dissolved Inorganic Carbon (DIC)	EPA 9060
Dissolved Mercury	EPA 245.2
Dissolved Metals ³ (31 metals)	EPA 200.7/200.8
Dissolved Organic Carbon (DOC)	SM 5310B
Fluoride	EPA 300.0
Sulfate	EPA 300.0
Sulfide	SM 4500-S ²⁻ F
TDS	SM 2540C
Total Inorganic Carbon (TIC)	EPA 9060
Total Mercury	EPA 7470A
Total Metals ² (31 metals)	EPA 6010B/6020
Total Organic Carbon (TOC)	SM 5310B

¹Standard method; American Public Health Association (2017).

²U.S. Environmental Protection Agency.

³See Table C-2 for entire sampling list of total and dissolved metals.

Table C-2. Total and Dissolved Metals and Cation Measurements for Groundwater Samples

Major Cations		Minor and Trace Metals	
Calcium	Aluminum	Copper	Selenium
Magnesium	Antimony	Iron	Silicon
Potassium	Arsenic	Lead	Silver
Sodium	Barium	Lithium	Strontium
	Beryllium	Manganese	Thallium
	Bismuth	Mercury	Thorium
	Boron	Molybdenum	Uranium
	Cadmium	Nickel	Vanadium
	Chromium	Phosphorus	Zinc
	Cobalt		

Table C-3. Isotope Measurements for Groundwater Samples

Isotope	Units
$\delta^2\text{H H}_2\text{O}$	‰ ^a
$\delta^{18}\text{O H}_2\text{O}$	‰
Tritium	TU ^b
$\delta^{13}\text{C DIC}$	‰
$^{14}\text{C DIC}$	pMC ^c

^a One tenth of a percent (0.1%).

^b Tritium unit.

^c Percent modern carbon.

C1-2. Soil Gas-Sampling and Analysis Protocol

Vadose zone soil gas monitoring directly measures the characteristics of the air space between soil components and is an indirect indicator of both chemical and biological processes occurring in and below a sampling horizon.

Soil Gas Profile Station Locations

Fixed soil gas profile stations will be installed for the sampling of soil gas adjacent to the well pads at the injection and monitoring wellsites J-ROC1 and MLR-1 prior to the initiation of CO₂ injection. A schematic of these soil gas profile stations is shown in Figure C-1. Each soil gas profile station contains three isolated gas-sampling screens from which individual soil gas samples will be obtained.

The procedures for the acquisition of the soil gas samples from the soil gas profile stations are as follows: sampling will not proceed until the screens have been purged and the composition of the soil gas has been determined to be stable. Following industry standards for landfill gas analysis, an on-site analysis of the soil gas will be conducted (RAE handheld meter) and a laboratory sample collected for the parameters identified in Table C-4. In addition, a sample will be collected and sent to Isotech Laboratories, Inc. (Champaign, Illinois) for isotopic analyses (see Table C-5).

Table C-4. Soil Gas Analytes Identified with Field and Laboratory Instruments

RAE Handheld Meter	Agilent Technologies RGA-GC 7890A
CO ₂	CO ₂
O ₂	O ₂
H ₂ S	N ₂
Total VOCs*	He
	H ₂
	CH ₄
	CO
	C ₂ H ₆
	C ₂ H ₄
	C ₃ H ₈
	C ₂ H ₈
	(CH ₃) ₂ CH-CH ₃ C ₄ H ₁₀
	HC≡CH
	H ₂ C=CH-C ₂ H ₅
	H ₃ C-CH=CH-CH ₃
	(CH ₃) ₂ C=CH ₂
	H ₃ C-CH=CH-CH ₃
	(CH ₃) ₂ CH-CH ₂ -CH ₃
	C ₅ H ₁₂
	H ₂ C=CH-CH=CH ₂

* Volatile organic compounds.

Table C-5. Isotope Measurements of Soil Gas Samples

Isotope	Units
δ ¹³ C of CO ₂	‰
δD	‰
¹⁴ C in CO ₂	pMC
¹⁴ C in CH ₄	pMC

C2. Near-Surface Water Well Verification

The North Dakota State Water Commission (NDSWC) drilling records provided the starting point for selecting baseline characterization and monitoring wells. Nearly 600 drilling records were included in the project area. Key well characteristics for further investigations were 1) potential as a drinking water source (i.e., labeled domestic, domestic/stock, and municipal) and 2) aquifer. Based on the database drilling records, most of the wells in the area draw from the Tongue River aquifer. As a result, wells labeled for purposes other than drinking water (e.g., stock, industrial, unknown) were included in the initial selection for the Fox Hills and Upper Hell Creek and Cannonball and Ludlow aquifers. The 42 well records fitting these criteria underwent review to verify their status (e.g., do they still exist? can they be sampled?). The verification process is ongoing. It is anticipated that up to 19 viable wells may be selected to characterize the baseline groundwater quality of the USDWs in the project area.

C3. Laboratory Analyses of Baseline Data

Existing monitoring well data have been compiled as one element of the baseline characterization effort. These data represent long-term regulatory monitoring associated with the BNI coal mine and MRYS power plant operations. Additionally, baseline sampling has begun in an existing observation well in the deepest USDW for in the USGS-managed Fox Hills observation well (NDSWC Well No. 3558) east of Center, North Dakota. The first of four anticipated baseline sampling events occurred on January 12, 2021.

Attached to this appendix are laboratory results from these three sources. They include the following:

1. 3 years of analyses from annual sampling of six mine land wells monitored by BNI
2. 3 years of analyses from five ash disposal pond wells monitored by MRYS.
3. Laboratory results from one sample of Fox Hills observation well 2558.

APPENDIX C-1

**BNI COAL MONITORING WELL ANALYSES
FOR BASELINE DATA**



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Page: 1 of 1

Derrick Placek
 BNI Coal
 2360 35th Ave SW
 Center ND 58530

Report Date: 8 Aug 18
 Lab Number: 18-W2083
 Work Order #: 82-1752
 Account #: 003022
 Date Sampled: 17 Jul 18 12:47
 Date Received: 18 Jul 18 8:00
 Sampled By: MVTL Field Services

Project Name: BNI Coal-Center
 Sample Description: 322A
 Sample Site: Annual Groundwater Sampling
 Event and Year: 2018

Temp at Receipt: 3.1C ROI

	As Received Result		Method RL	Method Reference	Date Analyzed	Analyst
Metal Digestion				EPA 200.2	18 Jul 18	SVS
pH	* 6.4	units	N/A	SM4500 H+ B	18 Jul 18 17:00	SVS
Conductivity (EC)	801	umhos/cm	N/A	SM2510-B	18 Jul 18 17:00	SVS
pH - Field	6.19	units	NA	SM 4500 H+ B	17 Jul 18 12:47	DJN
Temperature - Field	11.2	Degrees C	NA	SM 2550B	17 Jul 18 12:47	DJN
Total Alkalinity	118	mg/l CaCO3	20	SM2320-B	19 Jul 18 17:00	SVS
Phenolphthalein Alk	< 20	mg/l CaCO3	20	SM2320-B	19 Jul 18 17:00	SVS
Bicarbonate	118	mg/l CaCO3	20	SM2320-B	19 Jul 18 17:00	SVS
Carbonate	< 20	mg/l CaCO3	20	SM2320-B	19 Jul 18 17:00	SVS
Hydroxide	< 20	mg/l CaCO3	20	SM2320-B	19 Jul 18 17:00	SVS
Conductivity - Field	870	umhos/cm	1	EPA 120.1	17 Jul 18 12:47	DJN
Tot Dis Solids(Summation)	525	mg/l	12.5	SM1030-F	2 Aug 18 13:22	Calculated
Bicarb as HCO3	144	mg/l HCO3	NA	SM2320-B	19 Jul 18 17:00	Calculated
Total Hardness as CaCO3	415	mg/l	NA	SM2340-B	30 Jul 18 12:35	Calculated
Cation Summation	9.84	meq/L	NA	SM1030-F	30 Jul 18 12:35	Calc d
Anion Summation	8.25	meq/L	NA	SM1030-F	2 Aug 18 13:22	Calc d
Percent Error	8.79	%	NA	SM1030-F	2 Aug 18 13:22	Calc d
Sodium Adsorption Ratio	0.70		NA	USDA 20b	30 Jul 18 12:35	Calc d
Fluoride	< 0.1	mg/l	0.10	SM4500-F-C	18 Jul 18 17:00	SVS
Sulfate	277	mg/l	5.00	ASTM D516-07	20 Jul 18 14:32	EMS
Chloride	3.6	mg/l	1.0	SM4500-Cl-E	26 Jul 18 12:11	EV
Nitrate-Nitrite as N	0.25	mg/l	0.10	EPA 353.2	2 Aug 18 13:22	EV
Calcium - Total	96.2	mg/l	1.0	6010D	30 Jul 18 12:35	BT
Magnesium - Total	42.4	mg/l	1.0	6010D	30 Jul 18 12:35	BT
Sodium - Total	32.8	mg/l	1.0	6010D	30 Jul 18 12:35	BT
Potassium - Total	2.1	mg/l	1.0	6010D	30 Jul 18 12:35	BT
Iron - Dissolved	1.55	mg/l	0.10	6010D	27 Jul 18 11:25	BT
Manganese - Dissolved	0.28	mg/l	0.05	6010D	27 Jul 18 11:25	BT

* Holding time exceeded

Approved by:

Claudette K Carroll

CC
8 Aug 18

Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit

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 : = Due to sample quantity + = Due to internal standard response

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Page: 1 of 1

Derrick Placek
BNI Coal
2360 35th Ave SW
Center ND 58530

Report Date: 4 Aug 20
Lab Number: 20-W2663
Work Order #: 82-2008
Account #: 003022
Date Sampled: 27 Jul 20 12:50
Date Received: 27 Jul 20 16:49
Sampled By: MVTL Field Services

Project Name: BNI Coal - Center
Sample Description: 322A
Sample Site: Annual Groundwater Sampling
Event and Year: 2020

Temp at Receipt: 4.3C ROI

	As Received Result		Method RL	Method Reference	Date Analyzed	Analyst
Metal Digestion				EPA 200.2	28 Jul 20	HT
pH	* 6.6	units	N/A	SM4500 H+ B	28 Jul 20 17:00	HT
Conductivity (EC)	832	umhos/cm	N/A	SM2510-B	28 Jul 20 17:00	HT
pH - Field	6.14	units	NA	SM 4500 H+ B	27 Jul 20 12:50	DJN
Temperature - Field	10.0	Degrees C	NA	SM 2550B	27 Jul 20 12:50	DJN
Total Alkalinity	165	mg/l CaCO3	20	SM2320-B	28 Jul 20 17:00	HT
Phenolphthalein Alk	< 20	mg/l CaCO3	20	SM2320-B	28 Jul 20 17:00	HT
Bicarbonate	165	mg/l CaCO3	20	SM2320-B	28 Jul 20 17:00	HT
Carbonate	< 20	mg/l CaCO3	20	SM2320-B	28 Jul 20 17:00	HT
Hydroxide	< 20	mg/l CaCO3	20	SM2320-B	28 Jul 20 17:00	HT
Conductivity - Field	863	umhos/cm	1	EPA 120.1	27 Jul 20 12:50	DJN
Tot Dis Solids(Summation)	532	mg/l	12.5	SM1030-F	30 Jul 20 11:00	Calculated
Bicarb as HCO3	201	mg/l HCO3	NA	SM2320-B	28 Jul 20 17:00	Calculated
Total Hardness as CaCO3	423	mg/l	NA	SM2340-B	29 Jul 20 11:25	Calculated
Cation Summation	9.96	meq/L	NA	SM1030-F	3 Aug 20 13:38	Calculated
Anion Summation	8.68	meq/L	NA	SM1030-F	30 Jul 20 11:00	Calculated
Percent Error	6.87	%	NA	SM1030-F	3 Aug 20 13:38	Calculated
Sodium Adsorption Ratio	0.69		NA	USDA 20b	29 Jul 20 11:25	Calculated
Fluoride	< 0.1	mg/l	0.10	SM4500-F-C	28 Jul 20 17:00	HT
Sulfate	253	mg/l	5.00	ASTM D516-11	29 Jul 20 12:30	EV
Chloride	3.5	mg/l	1.0	SM4500-CL-E	29 Jul 20 9:46	EV
Nitrate-Nitrite as N	0.13	mg/l	0.10	EPA 353.2	30 Jul 20 11:00	EV
Calcium - Total	99.3	mg/l	1.0	6010D	29 Jul 20 11:25	MDE
Magnesium - Total	42.6	mg/l	1.0	6010D	29 Jul 20 11:25	MDE
Sodium - Total	32.4	mg/l	1.0	6010D	29 Jul 20 11:25	MDE
Potassium - Total	1.9	mg/l	1.0	6010D	29 Jul 20 11:25	MDE
Iron - Dissolved	0.88	mg/l	0.10	6010D	3 Aug 20 13:38	MDE
Manganese - Dissolved	0.14	mg/l	0.05	6010D	3 Aug 20 13:38	MDE

* Holding time exceeded

CC

Approved by: Claudette K Carroll 4 Aug 2020

Claudette K Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

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! = Due to sample quantity + = Due to internal standard response

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Derrick Placeck
BNI Coal
2360 35th Ave SW
Center ND 58530

Report Date: 19 Aug 19
Lab Number: 19-W2667
Work Order #: 82-1950
Account #: 003022
Date Sampled: 29 Jul 19 16:35
Date Received: 30 Jul 19 8:00
Sampled By: MVTL Field Services

Sample Description: 324

Temp at Receipt: 6.8C ROI

Event and Year: 2019

Table with columns: As Received Result, Method RL, Method Reference, Date Analyzed, Analyst. Rows include Metal Digestion, pH, Conductivity (EC), pH - Field, Temperature - Field, Total Alkalinity, Phenolphthalein Alk, Bicarbonate, Carbonate, Hydroxide, Conductivity - Field, Tot Dis Solids(Summation), Bicarb as HCO3, Total Hardness as CaCO3, Cation Summation, Anion Summation, Percent Error, Sodium Adsorption Ratio, Fluoride, Sulfate, Chloride, Nitrate-Nitrite as N, Calcium - Total, Magnesium - Total, Sodium - Total, Potassium - Total, Iron - Dissolved, Manganese - Dissolved.

* Holding time exceeded

Approved by:

Claudette K Carroll 20 Aug 19

Claudette K Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:
@ = Due to sample matrix # = Due to concentration of other analytes
! = Due to sample quantity * = Due to internal standard response

CERTIFICATION: ND # ND-00016



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Derrick Placek
BNI Coal
2360 35th Ave SW
Center ND 58530

Report Date: 7 Aug 20
Lab Number: 20-W2552
Work Order #: 82-1952
Account #: 003022
Date Sampled: 21 Jul 20 11:51
Date Received: 22 Jul 20 8:00
Sampled By: MVT L Field Services

Sample Description: 324

Temp at Receipt: 5.5C ROI

Table with columns: As Received Result, Method RL, Method Reference, Date Analyzed, Analyst. Rows include various chemical tests like pH, Conductivity, Total Alkalinity, etc.

* Holding time exceeded

CC

Approved by: Claudette K. Carroll 7 Aug 2020

Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:
a = Due to sample matrix # = Due to concentration of other analytes
! = Due to sample quantity + = Due to internal standard response

CERTIFICATION: ND # ND-00016



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Derrick Placek
 BNI Coal
 2360 35th Ave SW
 Center ND 58530

Report Date: 27 Aug 19
 Lab Number: 19-W2687
 Work Order #: 82-1966
 Account #: 003022
 Date Sampled: 29 Jul 19 13:45
 Date Received: 30 Jul 19 15:00
 Sampled By: MVTL Field Services

Sample Description: 363

Temp at Receipt: 0.7C

Event and Year: 2019

	As Received Result		Method RL	Method Reference	Date Analyzed	Analyst
Metal Digestion				EPA 200.2	30 Jul 19	MDE
pH	* 8.3	units	N/A	SM4500 H+ B	31 Jul 19 18:00	SVS
Conductivity (EC)	2460	umhos/cm	N/A	SM2510-B	31 Jul 19 18:00	SVS
pH - Field	7.97	units	NA	SM 4500 H+ B	29 Jul 19 13:45	JSM
Temperature - Field	13.4	Degrees C	NA	SM 2550B	29 Jul 19 13:45	JSM
Total Alkalinity	1110	mg/l CaCO3	20	SM2320-B	31 Jul 19 18:00	SVS
Phenolphthalein Alk	< 20	mg/l CaCO3	20	SM2320-B	31 Jul 19 18:00	SVS
Bicarbonate	1093	mg/l CaCO3	20	SM2320-B	31 Jul 19 18:00	SVS
Carbonate	< 20	mg/l CaCO3	20	SM2320-B	31 Jul 19 18:00	SVS
Hydroxide	< 20	mg/l CaCO3	20	SM2320-B	31 Jul 19 18:00	SVS
Conductivity - Field	2426	umhos/cm	1	EPA 120.1	29 Jul 19 13:45	JSM
Tot Dis Solids (Summation)	1500	mg/l	12.5	SM1030-F	14 Aug 19 10:17	Calculated
Bicarb as HCO3	1330	mg/l HCO3	NA	SM2320-B	31 Jul 19 18:00	Calculated
Total Hardness as CaCO3	36.8	mg/l	NA	SM2340-B	14 Aug 19 10:17	Calculated
Cation Summation	28.5	meq/L	NA	SM1030-F	16 Aug 19 18:14	Calculated
Anion Summation	26.1	meq/L	NA	SM1030-F	2 Aug 19 14:31	Calculated
Percent Error	4.37	%	NA	SM1030-F	16 Aug 19 18:14	Calculated
Sodium Adsorption Ratio	45.5		NA	USDA 20b	14 Aug 19 10:17	Calculated
Fluoride	0.99	mg/l	0.10	SM4500-F-C	31 Jul 19 18:00	SVS
Sulfate	176	mg/l	5.00	ASTM D516-07	2 Aug 19 14:31	EMS
Chloride	5.9	mg/l	1.0	SM4500-Cl-E	31 Jul 19 10:28	EV
Nitrate-Nitrite as N	0.54	mg/l	0.10	EPA 353.2	31 Jul 19 14:48	EMS
Calcium - Total	7.8	mg/l	1.0	6010D	14 Aug 19 10:17	SZ
Magnesium - Total	4.2	mg/l	1.0	6010D	14 Aug 19 10:17	SZ
Sodium - Total	634	mg/l	1.0	6010D	14 Aug 19 10:17	SZ
Potassium - Total	5.0	mg/l	1.0	6010D	14 Aug 19 10:17	SZ
Iron - Dissolved	0.30	mg/l	0.10	6010D	16 Aug 19 18:14	SZ
Manganese - Dissolved	0.07	mg/l	0.05	6010D	16 Aug 19 18:14	SZ

* Holding time exceeded

Approved by:

Claudette K Carroll

cc 28 Aug 19

Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

⊕ = Due to sample matrix # = Due to concentration of other analytes
 ! = Due to sample quantity + = Due to internal standard response

CERTIFICATION: ND # ND-00016



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www.mvtl.com



Page: 1 of 1

Derrick Placek
BNI Coal
2360 35th Ave SW
Center ND 58530

Report Date: 4 Aug 20
Lab Number: 20-W2657
Work Order #: 82-2008
Account #: 003022
Date Sampled: 27 Jul 20 13:43
Date Received: 27 Jul 20 16:49
Sampled By: MVTL Field Services

Project Name: BNI Coal - Center
Sample Description: 363
Sample Site: Annual Groundwater Sampling
Event and Year: 2020

Temp at Receipt: 4.3C ROI

Table with 6 columns: As Received Result, Method RL, Method Reference, Date Analyzed, Analyst. Rows include various chemical tests like pH, Conductivity, Total Hardness, etc.

* Holding time exceeded

Approved by:

Claudette K. Carroll 4 Aug 2020

Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:
@ = Due to sample matrix # = Due to concentration of other analytes
! = Due to sample quantity * = Due to internal standard response

CERTIFICATION: ND # ND-00016



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Page: 1 of 1

Derrick Placek
BNI Coal
2360 35th Ave SW
Center ND 58530

Report Date: 4 Aug 20
Lab Number: 20-W2669
Work Order #: 82-2018
Account #: 003022
Date Sampled: 28 Jul 20 10:08
Date Received: 28 Jul 20 14:25
Sampled By: MVTL Field Services

Project Name: BNI Coal - Center
Sample Description: C1-1
Sample Site: Annual Groundwater Sampling
Event and Year: 2020

Temp at Receipt: 2.2C ROI

	As Received Result		Method RL	Method Reference	Date Analyzed	Analyst
Metal Digestion				EPA 200.2	28 Jul 20	HT
pH	* 8.4	units	N/A	SM4500 H+ B	28 Jul 20 18:00	HT
Conductivity (EC)	1168	umhos/cm	N/A	SM2510-B	28 Jul 20 18:00	HT
pH - Field	8.31	units	NA	SM 4500 H+ B	28 Jul 20 10:08	DJN
Temperature - Field	11.6	Degrees F	1	SM 2550B	28 Jul 20 10:08	DJN
Total Alkalinity	526	mg/l CaCO3	20	SM2320-B	28 Jul 20 18:00	HT
Phenolphthalein Alk	< 20	mg/l CaCO3	20	SM2320-B	28 Jul 20 18:00	HT
Bicarbonate	522	mg/l CaCO3	20	SM2320-B	28 Jul 20 18:00	HT
Carbonate	< 20	mg/l CaCO3	20	SM2320-B	28 Jul 20 18:00	HT
Hydroxide	< 20	mg/l CaCO3	20	SM2320-B	28 Jul 20 18:00	HT
Conductivity - Field	1143	umhos/cm	1	EPA 120.1	28 Jul 20 10:08	DJN
Tot Dis Solids(Summation)	698	mg/l	12.5	SM1030-F	30 Jul 20 11:00	Calculated
Bicarb as HCO3	637	mg/l HCO3	NA	SM2320-B	28 Jul 20 18:00	Calculated
Total Hardness as CaCO3	26.7	mg/l	NA	SM2340-B	29 Jul 20 11:25	Calculated
Cation Summation	12.3	meq/L	NA	SM1030-F	3 Aug 20 13:38	Calculated
Anion Summation	12.7	meq/L	NA	SM1030-F	30 Jul 20 11:00	Calculated
Percent Error	-1.45	%	NA	SM1030-F	3 Aug 20 13:38	Calculated
Sodium Adsorption Ratio	22.5		NA	USDA 20b	29 Jul 20 11:25	Calculated
Fluoride	< 0.1	mg/l	0.10	SM4500-F-C	28 Jul 20 18:00	HT
Sulfate	99.7	mg/l	5.00	ASTM D516-11	29 Jul 20 13:56	EV
Chloride	2.6	mg/l	1.0	SM4500-Cl-E	29 Jul 20 9:46	EV
Nitrate-Nitrite as N	< 0.1	mg/l	0.10	EPA 353.2	30 Jul 20 11:00	EV
Calcium - Total	5.9	mg/l	1.0	6010D	29 Jul 20 11:25	MDE
Magnesium - Total	2.9	mg/l	1.0	6010D	29 Jul 20 11:25	MDE
Sodium - Total	267	mg/l	1.0	6010D	29 Jul 20 11:25	MDE
Potassium - Total	3.9	mg/l	1.0	6010D	29 Jul 20 11:25	MDE
Iron - Dissolved	1.71	mg/l	0.10	6010D	3 Aug 20 13:38	MDE
Manganese - Dissolved	< 0.05	mg/l	0.05	6010D	3 Aug 20 13:38	MDE

* Holding time exceeded

Approved by:

Claudette K Carroll

CC
4 Aug 2020

Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

⊙ = Due to sample matrix
! = Due to sample quantity

= Due to concentration of other analytes
+ = Due to internal standard response

CERTIFICATION: ND # ND-00016



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www.mvtd.com



Page: 1 of 1

Derrick Placek
BNI Coal
2360 35th Ave SW
Center ND 58530

Report Date: 10 Aug 18
Lab Number: 18-W2160
Work Order #: 82-1776
Account #: 003022
Date Sampled: 18 Jul 18 10:00
Date Received: 19 Jul 18 8:00
Sampled By: MVTL Field Services

Project Name: BNI Coal-Center
Sample Description: C7-1

Temp at Receipt: 4.2C ROI

Table with columns: As Received Result, Method RL, Method Reference, Date Analyzed, Analyst. Rows include Metal Digestion, pH, Conductivity (EC), pH - Field, Temperature - Field, Total Alkalinity, Phenolphthalein Alk, Bicarbonate, Carbonate, Hydroxide, Conductivity - Field, Tot Dis Solids(Summation), Bicarb as HCO3, Total Hardness as CaCO3, Cation Summation, Anion Summation, Percent Error, Sodium Adsorption Ratio, Fluoride, Sulfate, Chloride, Nitrate-Nitrite as N, Calcium - Total, Magnesium - Total, Sodium - Total, Potassium - Total, Iron - Dissolved, Manganese - Dissolved.

* Holding time exceeded

Approved by:

Claudette K Carroll

Handwritten signature and date: CC 10 Aug 18

Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

@ = Due to sample matrix N = Due to concentration of other analytes
? = Due to sample quantity + = Due to internal standard response

CERTIFICATION: ND # ND-00016



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Page: 1 of 1

Derrick Placek
 BNI Coal
 2360 35th Ave SW
 Center ND 58530

Report Date: 27 Aug 19
 Lab Number: 19-W2712
 Work Order #: 82-1976
 Account #: 003022
 Date Sampled: 30 Jul 19 9:07
 Date Received: 31 Jul 19 8:00
 Sampled By: MVTL Field Services

Sample Description: C7-1

Temp at Receipt: 7.3C ROI

Event and Year: 2019

	As Received Result		Method RL	Method Reference	Date Analyzed	Analyst
Metal Digestion				EPA 200.2	31 Jul 19	MDE
pH	* 8.4	units	N/A	SM4500 H+ B	1 Aug 19 17:00	SVS
Conductivity (EC)	2098	umhos/cm	N/A	SM2510-B	1 Aug 19 17:00	SVS
pH - Field	7.97	units	NA	SM 4500 H+ B	30 Jul 19 9:07	DJN
Temperature - Field	9.19	Degrees C	NA	SM 2550B	30 Jul 19 9:07	DJN
Total Alkalinity	1050	mg/l CaCO3	20	SM2320-B	1 Aug 19 17:00	SVS
Phenolphthalein Alk	< 20	mg/l CaCO3	20	SM2320-B	1 Aug 19 17:00	SVS
Bicarbonate	1030	mg/l CaCO3	20	SM2320-B	1 Aug 19 17:00	SVS
Carbonate	20	mg/l CaCO3	20	SM2320-B	1 Aug 19 17:00	SVS
Hydroxide	< 20	mg/l CaCO3	20	SM2320-B	1 Aug 19 17:00	SVS
Conductivity - Field	2084	umhos/cm	1	EPA 120.1	30 Jul 19 9:07	DJN
Tot Dis Solids(Summation)	1480	mg/l	12.5	SM1030-F	14 Aug 19 13:17	Calculated
Bicarb as HCO3	1260	mg/l HCO3	NA	SM2320-B	1 Aug 19 17:00	Calculated
Total Hardness as CaCO3	55.5	mg/l	NA	SM2340-B	14 Aug 19 13:17	Calculated
Cation Summation	25.3	meq/L	NA	SM1030-F	26 Aug 19 10:38	Calculated
Anion Summation	27.1	meq/L	NA	SM1030-F	2 Aug 19 15:11	Calculated
Percent Error	-3.33	%	NA	SM1030-F	26 Aug 19 10:38	Calculated
Sodium Adsorption Ratio	31.9		NA	USDA 20b	14 Aug 19 13:17	Calculated
Fluoride	1.12	mg/l	0.10	SM4500-F-C	1 Aug 19 17:00	SVS
Sulfate	252	mg/l	5.00	ASTM D516-07	2 Aug 19 15:11	EMS
Chloride	28.8	mg/l	1.0	SM4500-Cl-E	31 Jul 19 11:15	EV
Nitrate-Nitrite as N	< 2 @	mg/l	0.10	EPA 353.2	31 Jul 19 15:56	EMS
Calcium - Total	9.7	mg/l	1.0	6010D	14 Aug 19 13:17	SZ
Magnesium - Total	7.6	mg/l	1.0	6010D	14 Aug 19 13:17	SZ
Sodium - Total	547	mg/l	1.0	6010D	14 Aug 19 13:17	SZ
Potassium - Total	5.3	mg/l	1.0	6010D	14 Aug 19 13:17	SZ
Iron - Dissolved	7.52	mg/l	0.10	6010D	26 Aug 19 10:38	SZ
Manganese - Dissolved	0.17	mg/l	0.05	6010D	26 Aug 19 10:38	SZ

* Holding time exceeded

Approved by:

Claudette K Carroll

*cc
28 Aug 19*

Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

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= Due to concentration of other analytes
 + = Due to internal standard response

CERTIFICATION: ND # ND-00016



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Page: 1 of 1

Derrick Placek
 BNI Coal
 2360 35th Ave SW
 Center ND 58530

Report Date: 10 Aug 18
 Lab Number: 18-W2163
 Work Order #: 82-1776
 Account #: 003022
 Date Sampled: 18 Jul 18 11:13
 Date Received: 19 Jul 18 8:00
 Sampled By: MVTL Field Services

Project Name: BNI Coal-Center
 Sample Description: C9-1

Temp at Receipt: 4.2C ROI

	As Received Result		Method RL	Method Reference	Date Analyzed	Analyst
Metal Digestion				EPA 200.2	19 Jul 18	SVS
pH	* 8.2	units	N/A	SM4500 H+ B	19 Jul 18 18:00	SVS
Conductivity (EC)	2029	umhos/cm	N/A	SM2510-B	19 Jul 18 18:00	SVS
pH - Field	8.06	units	NA	SM 4500 H+ B	18 Jul 18 11:13	DJN
Temperature - Field	14.1	Degrees C	NA	SM 2550B	18 Jul 18 11:13	DJN
Total Alkalinity	968	mg/l CaCO3	20	SM2320-B	19 Jul 18 18:00	SVS
Phenolphthalein Alk	< 20	mg/l CaCO3	20	SM2320-B	19 Jul 18 18:00	SVS
Bicarbonate	968	mg/l CaCO3	20	SM2320-B	19 Jul 18 18:00	SVS
Carbonate	< 20	mg/l CaCO3	20	SM2320-B	19 Jul 18 18:00	SVS
Hydroxide	< 20	mg/l CaCO3	20	SM2320-B	19 Jul 18 18:00	SVS
Conductivity - Field	2028	umhos/cm	1	EPA 120.1	18 Jul 18 11:13	DJN
Tot Dis Solids(Summation)	1520	mg/l	12.5	SM1030-F	7 Aug 18 16:30	Calculated
Bicarb as HCO3	1180	mg/l HCO3	NA	SM2320-B	19 Jul 18 18:00	Calculated
Total Hardness as CaCO3	111	mg/l	NA	SM2340-B	30 Jul 18 14:35	Calculated
Cation Summation	24.3	meq/L	NA	SM1030-F	30 Jul 18 14:35	Calculated
Anion Summation	27.7	meq/L	NA	SM1030-F	7 Aug 18 16:30	Calculated
Percent Error	-6.42	%	NA	SM1030-F	7 Aug 18 16:30	Calculated
Sodium Adsorption Ratio	20.7		NA	USDA 20b	30 Jul 18 14:35	Calculated
Fluoride	1.11	mg/l	0.10	SM4500-F-C	19 Jul 18 18:00	SVS
Sulfate	364	mg/l	5.00	ASTM D516-07	20 Jul 18 15:44	EMS
Chloride	25.5	mg/l	1.0	SM4500-Cl-E	26 Jul 18 14:56	EV
Nitrate-Nitrite as N	0.42	mg/l	0.10	EPA 353.2	7 Aug 18 16:30	EMS
Calcium - Total	21.0	mg/l	1.0	6010D	30 Jul 18 14:35	BT
Magnesium - Total	14.3	mg/l	1.0	6010D	30 Jul 18 14:35	BT
Sodium - Total	503	mg/l	1.0	6010D	30 Jul 18 14:35	BT
Potassium - Total	8.4	mg/l	1.0	6010D	30 Jul 18 14:35	BT
Iron - Dissolved	0.79	mg/l	0.10	6010D	30 Jul 18 10:55	SZ
Manganese - Dissolved	< 0.05	mg/l	0.05	6010D	30 Jul 18 10:55	SZ

* Holding time exceeded

Approved by:

Cc
Claudette K Carroll *10 Aug 18*

Claudette K Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

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CERTIFICATION: ND # ND-00016



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www.mvtl.com



Page: 1 of 1

Derrick Placek
BNI Coal
2360 35th Ave SW
Center ND 58530

Report Date: 7 Aug 20
Lab Number: 20-W2543
Work Order #: 82-1952
Account #: 003022
Date Sampled: 21 Jul 20 8:59
Date Received: 22 Jul 20 8:00
Sampled By: MVTL Field Services

Sample Description: C9-1

Temp at Receipt: 5.5C ROI

	As Received Result		Method RL	Method Reference	Date Analyzed	Analyst
Metal Digestion				EPA 200.2	22 Jul 20	HT
pH	* 8.3	units	N/A	SM4500 H+ B	22 Jul 20 17:00	HT
Conductivity (EC)	2012	umhos/cm	N/A	SM2510-B	22 Jul 20 17:00	HT
pH - Field	8.20	units	NA	SM 4500 H+ B	21 Jul 20 8:59	DJN
Temperature - Field	9.91	Degrees C	NA	SM 2550B	21 Jul 20 8:59	DJN
Total Alkalinity	1080	mg/l CaCO3	20	SM2320-B	22 Jul 20 17:00	HT
Phenolphthalein Alk	< 20	mg/l CaCO3	20	SM2320-B	22 Jul 20 17:00	HT
Bicarbonate	1080	mg/l CaCO3	20	SM2320-B	22 Jul 20 17:00	HT
Carbonate	< 20	mg/l CaCO3	20	SM2320-B	22 Jul 20 17:00	HT
Hydroxide	< 20	mg/l CaCO3	20	SM2320-B	22 Jul 20 17:00	HT
Conductivity - Field	2012	umhos/cm	I	EPA 120.1	21 Jul 20 8:59	DJN
Tot Dis Solids (Summation)	1430	mg/l	12.5	SM1030-F	5 Aug 20 8:19	Calculated
Bicarb as HCO3	1320	mg/l HCO3	NA	SM2320-B	22 Jul 20 17:00	Calculated
Total Hardness as CaCO3	92.4	mg/l	NA	SM2340-B	24 Jul 20 13:45	Calculated
Cation Summation	24.2	meq/L	NA	SM1030-F	27 Jul 20 10:42	Calculated
Anion Summation	26.9	meq/L	NA	SM1030-F	5 Aug 20 8:19	Calculated
Percent Error	-5.27	%	NA	SM1030-F	5 Aug 20 8:19	Calculated
Sodium Adsorption Ratio	23.0		NA	USDA 20b	24 Jul 20 13:45	Calculated
Fluoride	1.14	mg/l	0.10	SM4500-F-C	22 Jul 20 17:00	HT
Sulfate	210	mg/l	5.00	ASTM D516-11	5 Aug 20 8:19	EV
Chloride	32.4	mg/l	1.0	SM4500-Cl-E	27 Jul 20 11:17	EV
Nitrate-Nitrite as N	< 0.1	mg/l	0.10	EPA 353.2	23 Jul 20 11:53	EMS
Calcium - Total	17.2	mg/l	1.0	6010D	24 Jul 20 13:45	MDE
Magnesium - Total	12.0	mg/l	1.0	6010D	24 Jul 20 13:45	MDE
Sodium - Total	508	mg/l	1.0	6010D	24 Jul 20 13:45	MDE
Potassium - Total	7.0	mg/l	1.0	6010D	24 Jul 20 13:45	MDE
Iron - Dissolved	1.96	mg/l	0.10	6010D	27 Jul 20 10:42	MDE
Manganese - Dissolved	0.06	mg/l	0.05	6010D	27 Jul 20 10:42	MDE

* Holding time exceeded

Approved by:

CC
Claudette K Carroll 7 Aug 2020

Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

⊕ = Due to sample matrix
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= Due to concentration of other analytes
+ = Due to internal standard response

CERTIFICATION: ND # ND-00016

APPENDIX C-2

**MILTON R. YOUNG POWER STATION
MONITORING WELL ANALYSES
FOR BASELINE DATA**



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www.mvttl.com



CERTIFICATE of ANALYSIS - STATE

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 21 Sep 20
Lab Number: 20-W3411
Work Order #: 82-2509
Account #: 007048
Date Sampled: 9 Sep 20 13:33
Date Received: 10 Sep 20 8:10
Sampled By: MVTL Field Services

Project Name: Minnkota - CCWDF

PO #: 200004

Sample Description: 92-5A

Temp at Receipt: 0.5C ROI

Event and Year: Fall 2020

Table with columns: As Received Result, Method RL, Method Reference, Date Analyzed, Analyst. Rows include various chemical tests like Metal Digestion, Total Suspended Solids, Conductivity, pH, etc.

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

@ = Due to sample matrix # = Due to concentration of other analytes
! = Due to sample quantity † = Due to internal standard response

CERTIFICATION: ND # ND-00016



MINNESOTA VALLEY TESTING LABORATORIES, INC.

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www.mvttl.com



Page: 2 of 2

CERTIFICATE of ANALYSIS - STATE

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 21 Sep 20
Lab Number: 20-W3411
Work Order #: 82-2509
Account #: 007048
Date Sampled: 9 Sep 20 13:33
Date Received: 10 Sep 20 8:10
Sampled By: MVTL Field Services

Project Name: Minnkota - CCWDF

PO #: 200004

Sample Description: 92-5A

Temp at Receipt: 0.5C ROI

Event and Year: Fall 2020

	As Received Result		Method RL	Method Reference	Date Analyzed	Analyst
Lead - Dissolved	< 0.0005 mg/l		0.0005	6020B	14 Sep 20 16:12	MDE
Molybdenum - Dissolved	< 0.002 mg/l		0.0020	6020B	14 Sep 20 16:12	MDE
Selenium - Dissolved	< 0.005 mg/l		0.0050	6020B	14 Sep 20 16:12	MDE
Silver - Dissolved	< 0.0005 mg/l		0.0005	6020B	14 Sep 20 16:12	MDE

* Holding time exceeded

Approved by:

C
Claudette K. Carroll 24 Sep 2020

Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

* = Due to sample matrix
! = Due to sample quantity

= Due to concentration of other analytes
+ = Due to internal standard response

CERTIFICATION: ND # ND-00016



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Page: 1 of 2

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 24 Aug 20
Lab Number: 20-W2873
Work Order #: 82-2147
Account #: 007048
Date Sampled: 6 Aug 20 15:55
Date Received: 7 Aug 20 8:00
Sampled By: MVTL Field Service

Project Name: Minnkota - CCWDF

PO #: 200004

Sample Description: 97-1

Temp at Receipt: 0.2C

Event and Year: Fall 2020

Table with columns: As Received Result, Method RL, Method Reference, Date Analyzed, Analyst. Rows include various chemical tests like pH, Conductivity, Total Suspended Solids, etc.

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:
@ = Due to sample matrix # = Due to concentration of other analytes
! = Due to sample quantity + = Due to internal standard response

CERTIFICATION: ND # ND-00016



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Page: 2 of 2

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 24 Aug 20
Lab Number: 20-W2873
Work Order #: 82-2147
Account #: 007048
Date Sampled: 6 Aug 20 15:55
Date Received: 7 Aug 20 8:00
Sampled By: MVTL Field Service

Project Name: Minnkota - CCWDF

PO #: 200004

Sample Description: 97-1

Temp at Receipt: 0.2C

Event and Year: Fall 2020

	As Received Result		Method RL	Method Reference	Date Analyzed	Analyst
Molybdenum - Dissolved	< 0.002 mg/l		0.0020	6020B	20 Aug 20 11:31	MDE
Selenium - Dissolved	< 0.005 mg/l		0.0050	6020B	20 Aug 20 11:31	MDE
Silver - Dissolved	< 0.0005 mg/l		0.0005	6020B	20 Aug 20 11:31	MDE

* Holding time exceeded

^ Elevated result due to instrument performance at the lower limit of quantification (LLOQ)

Approved by:

Claudette K Carroll

CC
25 Aug 2020

Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

@ = Due to sample matrix
! = Due to sample quantity

= Due to concentration of other analytes
+ = Due to internal standard response

CERTIFICATION: ND # ND-00016



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Page: 1 of 2

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 24 Aug 20
Lab Number: 20-W2869
Work Order #: 82-2147
Account #: 007048
Date Sampled: 5 Aug 20 16:40
Date Received: 7 Aug 20 8:00
Sampled By: MVTL Field Service

Project Name: Minnkota - CCWDF

PO #: 200004

Sample Description: 95-4

Temp at Receipt: 0.2C

Event and Year: Fall 2020

Table with 6 columns: As Received Result, Method RL, Method Reference, Date Analyzed, Analyst. Rows include various chemical tests like pH, Conductivity, Total Suspended Solids, etc.

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

@ = Due to sample matrix # = Due to concentration of other analytes
! = Due to sample quantity + = Due to internal standard response

CERTIFICATION: ND # ND-00016



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Page: 2 of 2

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 24 Aug 20
Lab Number: 20-W2869
Work Order #: 82-2147
Account #: 007048
Date Sampled: 5 Aug 20 16:40
Date Received: 7 Aug 20 8:00
Sampled By: MVTL Field Service

Project Name: Minnkota - CCWDF

PO #: 200004

Sample Description: 95-4

Temp at Receipt: 0.2C

Event and Year: Fall 2020

Table with 6 columns: Analyte, As Received Result, Method RL, Method Reference, Date Analyzed, Analyst. Rows include Molybdenum - Dissolved, Selenium - Dissolved, and Silver - Dissolved.

* Holding time exceeded

Approved by: Claudette K. Carroll 25 Aug 2020

Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:
@ = Due to sample matrix # = Due to concentration of other analytes
! = Due to sample quantity + = Due to internal standard response

CERTIFICATION: ND # ND-00016



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Page: 2 of 2

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 24 Aug 20
Lab Number: 20-W2868
Work Order #: 82-2147
Account #: 007048
Date Sampled: 5 Aug 20 14:57
Date Received: 7 Aug 20 8:00
Sampled By: MVTL Field Service

Project Name: Minnkota - CCWDF

PO #: 200004

Sample Description: 92-3

Temp at Receipt: 0.2C

Event and Year: Fall 2020

	As Received Result		Method RL	Method Reference	Date Analyzed	Analyst
Molybdenum - Dissolved	< 0.002 mg/l		0.0020	6020B	12 Aug 20 12:39	MDE
Selenium - Dissolved	< 0.005 mg/l		0.0050	6020B	12 Aug 20 12:39	MDE
Silver - Dissolved	< 0.0005 mg/l		0.0005	6020B	12 Aug 20 12:39	MDE

* Holding time exceeded

Approved by:

CC
Claudette K Carroll 25 Aug 2020

Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

S = Due to sample matrix # = Due to concentration of other analytes
! = Due to sample quantity + = Due to internal standard response

CERTIFICATION: ND 5 ND-00016



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Page: 2 of 2

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 24 Aug 20
Lab Number: 20-W2867
Work Order #: 82-2147
Account #: 007048
Date Sampled: 5 Aug 20 11:01
Date Received: 7 Aug 20 8:00
Sampled By: MVTL Field Service

Project Name: Minnkota - CCWDF

Sample Description: 92-6A

PO #: 200004

Event and Year: Fall 2020

Temp at Receipt: 0.2C

Table with 6 columns: Analyte, As Received Result, Method RL, Method Reference, Date Analyzed, Analyst. Rows include Molybdenum, Selenium, and Silver.

* Holding time exceeded

cc

Approved by: Claudette K Carroll 25 Aug 2020

Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:
@ = Due to sample matrix # = Due to concentration of other analytes
! = Due to sample quantity + = Due to internal standard response

CERTIFICATION: ND # ND-00016



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Page: 2 of 2

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 1 May 20
Lab Number: 20-W774
Work Order #: 82-0961
Account #: 007048
Date Sampled: 23 Apr 20 13:17
Date Received: 24 Apr 20 7:28
Sampled By: MVTL Field Services

Project Name: Minnkota - CCWDF

PO #: 200004

Sample Description: 92-5A

Temp at Receipt: 3.8C ROI

Event and Year: Spring 2020

Table with 6 columns: Analyte, As Received Result, Method RL, Method Reference, Date Analyzed, Analyst. Rows include Molybdenum, Selenium, and Silver.

* Holding time exceeded

Approved by:

Claudette K. Carroll (signature) CC 8 May 2020

Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

- Q = Due to sample matrix
! = Due to sample quantity
= Due to concentration of other analytes
* = Due to internal standard response

CERTIFICATION: ND 9 ND-00016

MVTL guarantees the accuracy of the analysis done on the sample submitted for testing. It is not possible for MVTL to guarantee that a test result obtained on a particular sample will be the same on any other sample unless all conditions affecting the sample are the same, including sampling by MVTL. As a mutual protection to clients, the public and ourselves, all reports are submitted as the confidential property of clients, and authorization for publication of statements, conclusions or extracts from or regarding our reports is reserved pending our written approval.



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Page: 2 of 2

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 1 May 20
Lab Number: 20-W775
Work Order #: 82-0961
Account #: 007048
Date Sampled: 23 Apr 20 10:12
Date Received: 24 Apr 20 7:28
Sampled By: MVTL Field Services

Project Name: Minnkota - CCWDF

PO #: 200004

Sample Description: 92-6A

Temp at Receipt: 3.8C ROI

Event and Year: Spring 2020

Table with 6 columns: Analyte, As Received Result, Method, Method Reference, Date Analyzed, Analyst. Rows include Molybdenum, Selenium, and Silver.

* Holding time exceeded

Approved by: Claudette K. Carrol 8 May 2020

Claudette K. Carrol, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

- 0 = Due to sample matrix
! = Due to sample quantity
= Due to concentration of other analytes
+ = Due to internal standard response

CERTIFICATION: ND # ND-00016

MVTL guarantees the accuracy of the analysis done on the sample submitted for testing. It is not possible for MVTL to guarantee that a test result obtained on a particular sample will be the same on any other sample unless all conditions affecting the sample are the same, including sampling by MVTL. As a mutual protection to clients, the public and ourselves, all reports are submitted as the confidential property of clients, and authorization for publication of statements, conclusions or extracts from or regarding our reports is reserved pending our written approval.



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Page: 2 of 2

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 1 May 20
Lab Number: 20-W776
Work Order #: 82-0961
Account #: 007048
Date Sampled: 23 Apr 20 16:51
Date Received: 24 Apr 20 7:28
Sampled By: MVTL Field Services

Project Name: Minnkota - CCWDF

PG #: 200004

Sample Description: 92-3

Temp at Receipt: 3.8C ROI

Event and Year: Spring 2020

Table with 6 columns: Analyte, As Received Result, Method RL, Method Reference, Date Analyzed, Analyst. Rows include Molybdenum - Dissolved, Selenium - Dissolved, and Silver - Dissolved.

* Holding time exceeded

Approved by:

Claudette K. Carroll 8 May 2020

Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

- a = Due to sample matrix
! = Due to sample quantity
= Due to concentration of other analytes
* = Due to internal standard response

CERTIFICATION: ND # ND-00016

MVTL guarantees the accuracy of the analysis done on the sample submitted for testing. It is not possible for MVTL to guarantee that a test result obtained on a particular sample will be the same on any other sample unless all conditions affecting the sample are the same, including sampling by MVTL. As a mutual protection to clients, the public and ourselves, all reports are submitted as the confidential property of clients, and authorization for publication of statements, conclusions or extracts from or regarding our reports is reserved pending our written approval.



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Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 1 May 20
Lab Number: 20-W777
Work Order #: 82-0961
Account #: 007048
Date Sampled: 23 Apr 20 15:09
Date Received: 24 Apr 20 7:28
Sampled By: MVTL Field Services

Project Name: Minnkota - CCWDF

PO #: 200004

Sample Description: 95-4

Temp at Receipt: 3.8C ROI

Event and Year: Spring 2020

	As Received Result	Method RL	Method Reference	Date Analyzed	Analyst
Molybdenum - Dissolved	< 0.002 mg/l	0.0020	6020B	27 Apr 20 13:10	CC
Selenium - Dissolved	< 0.005 mg/l	0.0050	6020B	27 Apr 20 13:10	CC
Silver - Dissolved	< 0.0005 mg/l	0.0005	6020B	27 Apr 20 13:10	CC

* Holding time exceeded

Approved by:

CC
Claudette K. Carroll 8 May 2020

Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:
@ = Due to sample matrix # = Due to concentration of other analytes
! = Due to sample quantity > = Due to internal standard response

CERTIFICATION: ND # ND-00016

MVTL guarantees the accuracy of the analysis done on the sample submitted for testing. It is not possible for MVTL to guarantee that a test result obtained on a particular sample will be the same on any other sample unless all conditions affecting the sample are the same, including sampling by MVTL. As a mutual protection to clients, the public and ourselves, all reports are submitted as the confidential property of clients, and authorization for publication of statements, conclusions or extracts from or regarding our reports is reserved pending our written approval.



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Page: 1 of 2

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 1 May 20
Lab Number: 20-W781
Work Order #: 82-0961
Account #: 007048
Date Sampled: 23 Apr 20 13:28
Date Received: 24 Apr 20 7:28
Sampled By: MVTL Field Services

Project Name: Minnkota - CCWDF

PO #: 200004

Sample Description: 97-1

Temp at Receipt: 3.8C ROI

Event and Year: Spring 2020

Table with columns: As Received Result, Method RL, Method Reference, Date Analyzed, Analyst. Rows include various chemical and physical tests like pH, Conductivity, Total Suspended Solids, etc.

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

@ = Due to sample matrix # = Due to concentration of other analytes
! = Due to sample quantity + = Due to internal standard response

CERTIFICATION: ND # ND-00016



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Page: 2 of 2

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 1 May 20
Lab Number: 20-W781
Work Order #: 82-0961
Account #: 007048
Date Sampled: 23 Apr 20 13:28
Date Received: 24 Apr 20 7:28
Sampled By: MVTL Field Services

Project Name: Minnkota - CCWDF

Sample Description: 97-1

PO #: 200004

Event and Year: Spring 2020

Temp at Receipt: 3.8C ROI

Table with 6 columns: Analyte, As Received Result, Method RL, Method Reference, Date Analyzed, and Analyst. Rows include Molybdenum - Dissolved, Selenium - Dissolved, and Silver - Dissolved.

* Holding time exceeded

Approved by: Claudette K. Carroll 8 May 2020

Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:
* = Due to sample matrix # = Due to concentration of other analytes
! = Due to sample quantity * = Due to internal standard response

CERTIFICATION: ND # ND-00016

MVTL guarantees the accuracy of the analysis done on the sample submitted for testing. It is not possible for MVTL to guarantee that a test result obtained on a particular sample will be the same on any other sample unless all conditions affecting the sample are the same, including sampling by MVTL. As a mutual protection to clients, the public and ourselves, all reports are submitted as the confidential property of clients, and authorization for publication of statements, conclusions or extracts from or regarding our reports is reserved pending our written approval.



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CERTIFICATE of ANALYSIS - STATE

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 3 Oct 19
Lab Number: 19-W3428
Work Order #: 82-2442
Account #: 007048
Date Sampled: 5 Sep 19 14:18
Date Received: 6 Sep 19 8:00
Sampled By: MVTL Field Services

Project Name: Minnkota - CCWDF - Hagel

PO #: 190093

Sample Description: 97-1

Temp at Receipt: 3.7C

Event and Year: Fall 2019

Table with columns: As Received Result, Method RL, Method Reference, Date Analyzed, Analyst. Rows include various chemical and physical tests like Total Suspended Solids, Conductivity, pH, Temperature, etc.

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

@ = Due to sample matrix # = Due to concentration of other analytes
! = Due to sample quantity + = Due to internal standard response

CERTIFICATION: ND # ND-00016

MVTL guarantees the accuracy of the analysis done on the sample submitted for testing. It is not possible for MVTL to guarantee that a test result obtained on a particular sample will be the same on any other sample unless all conditions affecting the sample are the same, including sampling by MVTL. As a mutual protection to clients, the public and ourselves, all reports are submitted as the confidential property of clients, and authorization for publication of statements, conclusions or extracts from or regarding our reports is reserved pending our written approval.



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Amended 5 Oct 19 (Pb result) - STATE

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 3 Oct 19
Lab Number: 19-W3428
Work Order #: 82-2442
Account #: 007048
Date Sampled: 5 Sep 19 14:18
Date Received: 6 Sep 19 8:00
Sampled By: MVTL Field Services

Project Name: Minnkota - CCWDF - Hagel

Sample Description: 97-1

PO #: 190093

Event and Year: Fall 2019

Temp at Receipt: 3.7C

Table with 6 columns: Analyte, As Received Result, Method RL, Method Reference, Date Analyzed, Analyst. Rows include Lead - Dissolved, Molybdenum - Dissolved, Selenium - Dissolved, and Silver Dissolved.

* Holding time exceeded

^ Elevated result due to instrument performance at the lower limit of quantification (LLOQ)

Approved by:

Claudette K. Carroll

Handwritten initials and date: CC 50CT19

Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

- = Due to sample matrix
! = Due to sample quantity
= Due to concentration of other analytes
+ = Due to internal standard response

CERTIFICATION: ND # ND-00016



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CERTIFICATE of ANALYSIS - STATE

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 1 Oct 19
Lab Number: 19-W3421
Work Order #: 82-2441
Account #: 007048
Date Sampled: 5 Sep 19 14:05
Date Received: 6 Sep 19 8:00
Sampled By: MVTL Field Services

Project Name: Minnkota - CCWDF

PO #: 190093

Sample Description: 92-5A

Temp at Receipt: 3.7C

Event and Year: Fall 2019

Table with columns: As Received Result, Method RL, Method Reference, Date Analyzed, Analyst. Rows include various chemical tests like Metal Digestion, Conductivity, pH, Temperature, etc.

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:
e = Due to sample matrix * = Due to concentration of other analytes
f = Due to sample quantity + = Due to internal standard response

CERTIFICATION: ND # ND-00016



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CERTIFICATE of ANALYSIS - STATE

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 1 Oct 19
Lab Number: 19-W3421
Work Order #: 82-2441
Account #: 007048
Date Sampled: 5 Sep 19 14:05
Date Received: 6 Sep 19 8:00
Sampled By: MVTL Field Services

Project Name: Minnkota - CCWDF

PO #: 190093

Sample Description: 92-5A

Temp at Receipt: 3.7C

Event and Year: Fall 2019

Table with 6 columns: Analyte, As Received Result, Method RL, Method Reference, Date Analyzed, Analyst. Rows include Lead - Dissolved, Molybdenum - Dissolved, Selenium - Dissolved, and Silver - Dissolved.

* Holding time exceeded

Approved by:

Claudette K. Carroll (handwritten signature) 10 OCT 19 (handwritten date)

Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL - Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

- = Due to sample matrix
! = Due to sample quantity
= Due to concentration of other analytes
+ = Due to internal standard response

CERTIFICATION: ND # ND-00016



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CERTIFICATE of ANALYSIS - STATE

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 1 Oct 19
Lab Number: 19-W3422
Work Order #: 82-2441
Account #: 007048
Date Sampled: 4 Sep 19 16:01
Date Received: 6 Sep 19 8:00
Sampled By: MVTL Field Services

Project Name: Minnkota - CCWDF

PO #: 190093

Sample Description: 92-6A

Temp at Receipt: 3.7C

Event and Year: Fall 2019

Table with columns: As Received Result, Method RL, Method Reference, Date Analyzed, Analyst. Lists various chemical tests such as Metal Digestion, Total Suspended Solids, Conductivity (EC), pH, Temperature - Field, etc.

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:
@ = Due to sample matrix # = Due to concentration of other analytes
! = Due to sample quantity * = Due to internal standard response

CERTIFICATION: ND # ND-00016

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CERTIFICATE of ANALYSIS - STATE

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 1 Oct 19
Lab Number: 19-W3422
Work Order #: 82-2441
Account #: 007048
Date Sampled: 4 Sep 19 16:01
Date Received: 6 Sep 19 8:00
Sampled By: MVTL Field Services

Project Name: Minnkota - CCWDF

PO #: 190093

Sample Description: 92-6A

Temp at Receipt: 3.7C

Event and Year: Fall 2019

Table with 6 columns: As Received Result, Method RL, Method Reference, Date Analyzed, and Analyst. Rows include Lead - Dissolved, Molybdenum - Dissolved, Selenium - Dissolved, and Silver - Dissolved.

* Holding time exceeded

Approved by:

Claudette K Carroll

CC
10CTA

Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

- 0 = Due to sample matrix
1 = Due to sample quantity
= Due to concentration of other analytes
* = Due to internal standard response

CERTIFICATION: ND # ND-00016

MVTL guarantees the accuracy of the analysis done on the sample submitted for testing. It is not possible for MVTL to guarantee that a test result obtained on a particular sample will be the same on any other sample unless all conditions affecting the sample are the same, including sampling by MVTL. As a mutual protection to clients, the public and ourselves, all reports are submitted as the confidential property of clients, and authorization for publication of statements, conclusions or extracts from or regarding our reports is reserved pending our written approval.



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www.mvttl.com



CERTIFICATE of ANALYSIS - STATE

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 1 Oct 19
Lab Number: 19-W3423
Work Order #: 82-2441
Account #: 007048
Date Sampled: 5 Sep 19 16:15
Date Received: 6 Sep 19 8:00
Sampled By: MVTL Field Services

Project Name: Minnkota - CCWDF

PO #: 190093

Sample Description: 92-3

Temp at Receipt: 3.7C

Event and Year: Fall 2019

Table with 6 columns: Analyte, As Received Result, Method RL, Method Reference, Date Analyzed, Analyst. Rows include Lead - Dissolved, Molybdenum - Dissolved, Selenium - Dissolved, and Silver - Dissolved.

* Holding time exceeded

Approved by: Claudette K. Carroll (signature) 10 OCT 19
Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:
@ = Due to sample matrix # = Due to concentration of other analytes
! = Due to sample quantity + = Due to internal standard response

CERTIFICATION: ND # ND-00016

MVTL guarantees the accuracy of the analysis done on the sample submitted for testing. It is not possible for MVTL to guarantee that a test result obtained on a particular sample will be the same on any other sample unless all conditions affecting the sample are the same, including sampling by MVTL. As a mutual protection to clients, the public and ourselves, all reports are submitted as the confidential property of clients, and authorization for publication of statements, conclusions or extracts from or regarding our reports is reserved pending our written approval.



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www.mvtl.com



CERTIFICATE of ANALYSIS - STATE

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 1 Oct 19
Lab Number: 19-W3424
Work Order #: 82-2441
Account #: 007048
Date Sampled: 5 Sep 19 17:59
Date Received: 6 Sep 19 8:00
Sampled By: MVTL Field Services

Project Name: Minnkota - CCWDF

PO #: 190093

Sample Description: 95-4

Temp at Receipt: 3.7C

Event and Year: Fall 2019

Table with 6 columns: As Received Result, Method RL, Method Reference, Date Analyzed, Analyst. Rows include various chemical and physical tests like Metal Digestion, Conductivity, pH, Temperature, etc.

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

@ = Due to sample matrix # = Due to concentration of other analytes
! = Due to sample quantity + = Due to internal standard response

CERTIFICATION: ND # ND-00016

MVTL guarantees the accuracy of the analysis done on the sample submitted for testing. It is not possible for MVTL to guarantee that a test result obtained on a particular sample will be the same as any other sample unless all conditions affecting the sample are the same, including sampling by MVTL. As a mutual protection to clients, the public and ourselves, all reports are submitted as the confidential property of clients, and authorization for publication of statements, conclusions or extracts from or regarding our reports is reserved pending our written approval.



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CERTIFICATE of ANALYSIS - STATE

Scott Hopfauf
 Minnkota Power Cooperative
 3401 24th St SW
 Center ND 58530

Report Date: 1 Oct 19
 Lab Number: 19-W3424
 Work Order #: 82-2441
 Account #: 007048
 Date Sampled: 5 Sep 19 17:59
 Date Received: 6 Sep 19 8:00
 Sampled By: MVTL Field Services

Project Name: Minnkota - CCWDF

PO #: 190093

Sample Description: 95-4

Temp at Receipt: 3.7C

Event and Year: Fall 2019

	As Received Result	Method RL	Method Reference	Date Analyzed	Analyst
Lead - Dissolved	< 0.0005 mg/l	0.0005	6020B	30 Sep 19 15:16	MDE
Molybdenum - Dissolved	< 0.002 mg/l	0.0020	6020B	30 Sep 19 15:16	MDE
Selenium - Dissolved	< 0.005 mg/l	0.0050	6020B	30 Sep 19 15:16	MDE
Silver - Dissolved	< 0.0005 mg/l	0.0005	6020B	30 Sep 19 15:16	MDE

* Holding time exceeded

Approved by:

Claudette K. Carroll

10 OCT 19

Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

- o = Due to sample matrix
- ! = Due to concentration of other analytes
- | = Due to sample quantity
- * = Due to internal standard response

CERTIFICATION: ND # ND-00016

MVTL guarantees the accuracy of the analysis done on the sample submitted for testing. It is not possible for MVTL to guarantee that a test result obtained on a particular sample will be the same on any other sample unless all conditions affecting the sample are the same, including sampling by MVTL. As a mutual protection to clients, the public and ourselves, all reports are submitted as the confidential property of clients, and authorization for publication of statements, conclusions or extracts from or regarding our reports is reserved pending our written approval.



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Page: 1 of 2

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 17 Jun 19
Lab Number: 19-W1534
Work Order #: 82-1235
Account #: 007048
Date Sampled: 28 May 19 14:41
Date Received: 30 May 19 8:00
Sampled By: MVTL Field Services

Project Name: Minnkota-CCWDF

PO #: 190093

Sample Description: 92-3

Temp at Receipt: 3.2C

Event and Year: May 2019

Table with columns: As Received Result, Method RL, Method Reference, Date Analyzed, Analyst. Rows include various chemical and physical parameters like pH, Conductivity, Total Suspended Solids, etc.

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:
@ = Due to sample matrix # = Due to concentration of other analytes
! = Due to sample quantity + = Due to internal standard response

CERTIFICATION: ND # ND-00016



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Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 17 Jun 19
Lab Number: 19-W1534
Work Order #: 82-1235
Account #: 007048
Date Sampled: 28 May 19 14:41
Date Received: 30 May 19 8:00
Sampled By: MVTL Field Services

Project Name: Minnkota-CCWDF

Sample Description: 92-3

Event and Year: May 2019

PO #: 190093

Temp at Receipt: 3.2C

Table with 6 columns: Analyte, As Received Result, Method RL, Method Reference, Date Analyzed, Analyst. Rows include Molybdenum - Dissolved, Selenium - Dissolved, and Silver - Dissolved.

* Holding time exceeded

Approved by: Claudette K. Carroll 28 Jun 19
Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL - Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:
@ = Due to sample matrix # = Due to concentration of other analytes
! = Due to sample quantity + = Due to internal standard response

CERTIFICATION: ND # ND-00016

MVTL guarantees the accuracy of the analysis done on the sample submitted for testing. It is not possible for MVTL to guarantee that a test result obtained on a particular sample will be the same on any other sample unless all conditions affecting the sample are the same, including sampling by MVTL. As a mutual protection to clients, the public and ourselves, all reports are submitted as the confidential property of clients, and authorization for publication, release, reprints, translations or extracts from or regarding our reports is reserved pending our written approval.



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Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 17 Jun 19
Lab Number: 19-W1535
Work Order #: 82-1235
Account #: 007048
Date Sampled: 28 May 19 16:23
Date Received: 30 May 19 8:00
Sampled By: MVTI Field Services

Project Name: Minnkota-CCWDF

PO #: 190093

Sample Description: 95-4

Temp at Receipt: 3.2C

Event and Year: May 2019

Table with columns: As Received Result, Method RL, Method Reference, Date Analyzed, Analyst. Rows include various chemical tests like pH, Conductivity, Total Suspended Solids, etc.

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:
* = Due to sample matrix
! = Due to sample quantity
= Due to concentration of other analytes
+ = Due to internal standard response

CERTIFICATION: ND # ND-00016

MVTI guarantees the accuracy of the analysis done on the sample submitted for testing. It is not possible for MVTI to guarantee that a test result obtained on a particular sample will be the same on any other sample unless all conditions affecting the sample are the same, including sampling by MVTI. As a mutual protection to clients, the public and ourselves, all reports are submitted as the confidential property of clients, and authorization for publication of statements, conclusions or extracts from or regarding our reports is reserved pending our written approval.



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Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 17 Jun 19
Lab Number: 19-W1535
Work Order #: 82-1235
Account #: 007048
Date Sampled: 28 May 19 16:23
Date Received: 30 May 19 8:00
Sampled By: MVTL Field Services

Project Name: Minnkota-CCWDF

Sample Description: 95-4

Event and Year: May 2019

PO #: 190093

Temp at Receipt: 3.2C

Table with 6 columns: Analyte, As Received Result, Method RL, Method Reference, Date Analyzed, Analyst. Rows include Molybdenum - Dissolved, Selenium - Dissolved, and Silver - Dissolved.

* Holding time exceeded

Approved by: Claudette K. Carroll, 28 Jun 19

Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:
* = Due to sample matrix
: = Due to sample quantity

CERTIFICATION: ND # ND-00014



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Page: 1 of 2

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 17 Jun 19
Lab Number: 19-W1533
Work Order #: 82-1235
Account #: 007048
Date Sampled: 28 May 19 12:23
Date Received: 30 May 19 8:00
Sampled By: MVTL Field Services

Project Name: Minnkota-CCWDF

PO #: 190093

Sample Description: 92-6A

Temp at Receipt: 3.2C

Event and Year: May 2019

Table with columns: As Received Result, Method RL, Method Reference, Date Analyzed, Analyst. Rows include various chemical and physical parameters like pH, Conductivity, Total Solids, etc.

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:
e = Due to sample matrix # = Due to concentration of other analytes
? = Due to sample quantity * = Due to internal standard response

CERTIFICATION: ND # ND-00016

MVTL guarantees the accuracy of the analysis done on the sample submitted for testing. It is not possible for MVTL to guarantee that a test result obtained on a particular sample will be the same on any other sample unless all conditions affecting the sample are the same, including sampling by MVTL. As a mutual protection to clients, the public and ourselves, all reports are submitted as the confidential property of clients, and authorization for publication of statements, conclusions or extracts from or regarding our reports is reserved pending our written approval.



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Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 17 Jun 19
Lab Number: 19-W1533
Work Order #: 82-1235
Account #: 007048
Date Sampled: 28 May 19 12:23
Date Received: 30 May 19 8:00
Sampled By: MVTL Field Services

Project Name: Minnkota-CCWDF

PO #: 190093

Sample Description: 92-6A

Temp at Receipt: 3.2C

Event and Year: May 2019

Table with 6 columns: Analyte, As Received Result, Method RL, Method Reference, Date Analyzed, Analyst. Rows include Molybdenum - Dissolved, Selenium - Dissolved, and Silver - Dissolved.

* Holding time exceeded

CC

Approved by: Claudette K. Carroll 28 Jun 19

Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:
@ = Due to sample matrix
! = Due to sample quantity
= Due to concentration of other analytes
* = Due to internal standard response

CERTIFICATION ND # ND-00916

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Page: 1 of 2

Scott Hopfauf
 Minnkota Power Cooperative
 3401 24th St SW
 Center ND 58530

Report Date: 17 Jun 19
 Lab Number: 19-W1532
 Work Order #: 82-1235
 Account #: 007048
 Date Sampled: 29 May 19 12:10
 Date Received: 30 May 19 8:00
 Sampled By: MVTL Field Services

Project Name: Minnkota-CCWDF

PO #: 190093

Sample Description: 92-5A

Temp at Receipt: 3.2C

Event and Year: May 2019

	As Received Result	units	Method RL	Method Reference	Date Analyzed	Analyst
Metal Digestion				EPA 200.2	30 May 19	SVS
pH	* 9.0	units	N/A	SM4500 H+ B	30 May 19 17:00	SVS
Conductivity (EC)	1131	umhos/cm	N/A	SM2510-B	30 May 19 17:00	SVS
Total Suspended Solids	44	mg/l	2	I3765-85	30 May 19 15:27	SVS
pH - Field	8.75	units	NA	SM 4500 H+ B	29 May 19 12:10	DJN
Temperature - Field	9.13	Degrees C	NA	SM 2550B	29 May 19 12:10	DJN
Total Alkalinity	488	mg/l CaCO3	20	SM2320-B	30 May 19 17:00	SVS
Phenolphthalein Alk	35	mg/l CaCO3	20	SM2320-B	30 May 19 17:00	SVS
Bicarbonate	417	mg/l CaCO3	20	SM2320-B	30 May 19 17:00	SVS
Carbonate	71	mg/l CaCO3	20	SM2320-B	30 May 19 17:00	SVS
Hydroxide	< 20	mg/l CaCO3	20	SM2320-B	30 May 19 17:00	SVS
Conductivity - Field	1137	umhos/cm	1	EPA 120.1	29 May 19 12:10	DJN
Tot Dis Solids(Summation)	693	mg/l	12.5	SM1030-F	13 Jun 19 13:56	Calculated
Total Hardness as CaCO3	2.50	mg/l	NA	SM2340-B	13 Jun 19 13:56	Calculated
Cation Summation	13.6	meq/L	NA	SM1030-F	13 Jun 19 13:56	Calculated
Anion Summation	11.6	meq/L	NA	SM1030-F	5 Jun 19 9:47	Calculated
Percent Error	7.88	%	NA	SM1030-F	13 Jun 19 13:56	Calculated
Fluoride	0.53	mg/l	0.10	SM4500-F-C	30 May 19 17:00	SVS
Sulfate	85.4	mg/l	5.00	ASTM D516-07	31 May 19 10:32	EMS
Chloride	2.0	mg/l	1.0	SM4500-Cl-E	5 Jun 19 9:47	EV
Nitrate-Nitrite as N	< 0.1	mg/l	0.10	EPA 353.2	30 May 19 11:09	EMS
Phosphorus as P - Total	0.16	mg/l	0.10	EPA 365.1	31 May 19 10:19	EV
Mercury - Dissolved	< 0.0002	mg/l	0.0002	EPA 245.1	5 Jun 19 13:06	EMS
Calcium - Total	1.0	mg/l	1.0	6010D	13 Jun 19 13:56	SZ
Magnesium - Total	< 1	mg/l	1.0	6010D	13 Jun 19 13:56	SZ
Sodium - Total	310	mg/l	1.0	6010D	13 Jun 19 13:56	SZ
Potassium - Total	1.7	mg/l	1.0	6010D	13 Jun 19 13:56	SZ
Iron - Dissolved	< 0.1	mg/l	0.10	6010D	5 Jun 19 12:03	SZ
Manganese - Dissolved	< 0.05	mg/l	0.05	6010D	5 Jun 19 12:03	SZ
Boron - Dissolved	0.37	mg/l	0.10	6010D	4 Jun 19 11:18	SZ
Arsenic - Dissolved	< 0.002	mg/l	0.0020	6020B	11 Jun 19 15:27	MDE
Barium - Dissolved	0.0325	mg/l	0.0020	6020B	14 Jun 19 10:46	MDE
Beryllium - Dissolved	< 0.0005	mg/l	0.0005	6020B	11 Jun 19 15:27	MDE
Cadmium - Dissolved	< 0.0005	mg/l	0.0005	6020B	11 Jun 19 15:27	MDE
Chromium - Dissolved	< 0.002	mg/l	0.0020	6020B	11 Jun 19 15:27	MDE
Lead - Dissolved	< 0.0005	mg/l	0.0005	6020B	11 Jun 19 15:27	MDE

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

- * = Due to sample matrix
- ! = Due to sample quantity
- § = Due to concentration of other analytes
- + = Due to internal standard response

CERTIFICATION: ND # ND-00016

MVTL guarantees the accuracy of the analysis done on the sample submitted for testing. It is not possible for MVTL to guarantee that a test result obtained on a particular sample will be the same on any other sample unless all conditions affecting the sample are the same, including sampling by MVTL. As a mutual protection to clients, the public and ourselves, all reports are submitted as the confidential property of clients, and authorization for publication of statements, conclusions or extracts from or regarding our reports is reserved pending our written approval.



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Page: 2 of 2

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 17 Jun 19
Lab Number: 19-W1532
Work Order #: 82-1235
Account #: 007048
Date Sampled: 29 May 19 12:10
Date Received: 30 May 19 8:00
Sampled By: MVTL Field Services

Project Name: Minnkota-CCWDF

PO #: 190093

Sample Description: 92-5A

Temp at Receipt: 3.2C

Event and Year: May 2019

Table with 6 columns: Analyte, As Received Result, Method RL, Method Reference, Date Analyzed, Analyst. Rows include Molybdenum - Dissolved, Selenium - Dissolved, and Silver - Dissolved.

* Holding time exceeded

Approved by: Claudette K Carroll 28 Jun 19
Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:
@ = Due to sample matrix # = Due to concentration of other analytes
! = Due to sample quantity * = Due to internal standard response

CERTIFICATION: ND # ND-00015

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Page: 1 of 2

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 19 Jun 19
Lab Number: 19-W1539
Work Order #: 82-1251
Account #: 007048
Date Sampled: 29 May 19 8:54
Date Received: 30 May 19 8:00
Sampled By: MVTL Field Services

Project Name: Minnkota-CCWDF

Sample Description: 97-1

PO #: 190093

Event and Year: May 2019

Temp at Receipt: 3.2C

Table with columns: As Received Result, Method RL, Method Reference, Date Analyzed, Analyst. Rows include various chemical and physical parameters like pH, Conductivity, Total Suspended Solids, etc.

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

- ⊙ = Due to sample matrix
! = Due to sample quantity
= Due to concentration of other analytes
+ = Due to internal standard response

CERTIFICATION: ND # ND-00016

MVTL guarantees the accuracy of the analysis done on the sample submitted for testing. It is not possible for MVTL to guarantee that a test result obtained on a particular sample will be the same on any other sample unless all conditions affecting the sample are the same, including sampling by MVTL. As a mutual protection to clients, the public and ourselves, all reports are submitted as the confidential property of clients, and authorization for publication of statements, conclusions or extracts from or regarding our reports is reserved pending our written approval.



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Page: 2 of 2

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 19 Jun 19
Lab Number: 19-W1539
Work Order #: 82-1251
Account #: 007048
Date Sampled: 29 May 19 8:54
Date Received: 30 May 19 8:00
Sampled By: MVTL Field Services

Project Name: Minnkota-CCWDF

PO #: 190093

Sample Description: 97-1

Temp at Receipt: 3.2C

Event and Year: May 2019

Table with 6 columns: Analyte, As Received Result, Method RL, Method Reference, Date Analyzed, Analyst. Rows include Molybdenum - Dissolved, Selenium - Dissolved, and Silver - Dissolved.

* Holding time exceeded

^ Elevated result due to instrument performance at the lower limit of quantification (LLOQ).

Approved by:

Claudette K. Carroll, 28 Jun 19

Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:
@ = Due to sample matrix, # = Due to concentration of other analytes
! = Due to sample quantity, + = Due to internal standard response

CERTIFICATION: ND # ND-90016



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CERTIFICATE of ANALYSIS - STATE

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 5 Oct 18
Lab Number: 18-W3108
Work Order #: 82-2513
Account #: 007048
Date Sampled: 25 Sep 18 11:04
Date Received: 25 Sep 18 15:49
Sampled By: MVT L Field Services

Project Name: Minnkota-CCWDF

Sample Description: 97-1

PO #: 180247

Event and Year: Sept 2018

Temp at Receipt: 2.1C

Table with columns: As Received Result, Method RL, Method Reference, Date Analyzed, Analyst. Rows include Metal Digestion, Total Suspended Solids, Conductivity (EC), pH - Field, pH, Temperature - Field, Total Alkalinity, Phenolphthalein Alk, Bicarbonate, Carbonate, Hydroxide, Conductivity - Field, Tot Dis Solids (Summation), Total Hardness as CaCO3, Cation Summation, Anion Summation, Percent Error, Fluoride, Sulfate, Chloride, Nitrate-Nitrite as N, Phosphorus as P - Total, Mercury - Dissolved, Calcium - Total, Magnesium - Total, Sodium - Total, Potassium - Total, Iron - Dissolved, Manganese - Dissolved, Boron - Dissolved, Arsenic - Dissolved, Barium - Dissolved, Cadmium - Dissolved, Chromium - Dissolved, Lead - Dissolved.

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

@ = Due to sample matrix # = Due to concentration of other analytes
! = Due to sample quantity * = Due to internal standard response

CERTIFICATION: ND # ND-00016

MVT L guarantees the accuracy of the analysis done on the sample submitted for testing. It is not possible for MVT L to guarantee that a test result obtained on a particular sample will be the same on any other sample unless all conditions affecting the sample are the same, including sampling by MVT L. As a mutual protection to clients, the public and ourselves, all reports are submitted as the confidential property of clients, and authorization for publication of statements, conclusions or extracts from or regarding our reports is reserved pending our written approval.



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CERTIFICATE of ANALYSIS - STATE

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 5 Oct 18
Lab Number: 18-W3108
Work Order #: 82-2513
Account #: 007048
Date Sampled: 25 Sep 18 11:04
Date Received: 25 Sep 18 15:49
Sampled By: MVTL Field Services

Project Name: Minnkota-CCWDF

PO #: 180247

Sample Description: 97-1

Temp at Receipt: 2.1C

Event and Year: Sept 2018

Table with 6 columns: Analyte, As Received Result, Method RL, Method Reference, Date Analyzed, Analyst. Rows include Molybdenum - Dissolved, Selenium - Dissolved, and Silver - Dissolved.

* Holding time exceeded

Approved by: Claudette K. Carroll 10 OCT 18

Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:
@ = Due to sample matrix # = Due to concentration of other analytes
! = Due to sample quantity + = Due to internal standard response

CERTIFICATION: ND # ND-00016

MVTL guarantees the accuracy of the analysis data on the sample submitted for testing. It is not possible for MVTL to guarantee that a test result obtained on a particular sample will be the same on any other sample unless all conditions affecting the sample are the same, including sampling by MVTL. As a mutual protection to clients, the public and ourselves, all reports are submitted as the confidential property of clients, and authorization for publication of statements, conclusions or extracts from or regarding our reports is reserved pending our written approval.



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www.mvtl.com



CERTIFICATE of ANALYSIS - STATE

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 5 Oct 18
Lab Number: 18-W3109
Work Order #: 82-2513
Account #: 007048
Date Sampled: 24 Sep 18 18:02
Date Received: 25 Sep 18 15:49
Sampled By: MVTL Field Services

Project Name: Minnkota-CCWDF

PO #: 180247

Sample Description: 92-5A

Temp at Receipt: 2.1C

Event and Year: Sept 2018

Table with columns: As Received Result, Method RL, Method Reference, Date Analyzed, Analyst. Rows include various chemical and physical tests like Total Suspended Solids, Conductivity, pH, Temperature, etc.

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

@ = Due to sample matrix # = Due to concentration of other analytes
! = Due to sample quantity * = Due to internal standard response

CERTIFICATION: ND # ND-00015

MVTL guarantees the accuracy of the analysis data on the sample submitted for testing. It is not possible for MVTL to guarantee that a test result obtained on a particular sample will be the same on any other sample unless all conditions affecting the sample are the same, including sampling by MVTL. As a mutual protection to clients, the public and ourselves, all reports are submitted as the confidential property of clients, and authorization for publication of statements, conclusions or extracts from or regarding our reports is reserved pending our written approval.



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CERTIFICATE of ANALYSIS - STATE

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 5 Oct 18
Lab Number: 18-W3109
Work Order #: 82-2513
Account #: 007048
Date Sampled: 24 Sep 18 18:02
Date Received: 25 Sep 18 15:49
Sampled By: MVTL Field Services

Project Name: Minnkota-CCWDF

PO #: 180247

Sample Description: 92-5A

Temp at Receipt: 2.1C

Event and Year: Sept 2018

Table with 6 columns: Analyte, As Received Result, Method, Method Reference, Date Analyzed, Analyst. Rows include Molybdenum - Dissolved, Selenium - Dissolved, and Silver - Dissolved.

* Holding time exceeded

Approved by: Claudette K Carroll 10 OCT 18
Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

- = Due to sample matrix
= Due to concentration of other analytes
! = Due to sample quantity
+ = Due to internal standard response

CERTIFICATION: ND # ND-00016

MVTL guarantees the accuracy of the analysis done on the sample submitted for testing. It is not possible for MVTL to guarantee that a test result obtained on a particular sample will be the same on any other sample unless all conditions affecting the sample are the same, including sampling by MVTL. As a mutual protection to clients, the public and ourselves, all reports are submitted as the confidential property of clients, and authorization for publication of statements, conclusions or extracts from or regarding our reports is reserved pending our written approval.



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CERTIFICATE of ANALYSIS - STATE

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 5 Oct 18
Lab Number: 18-W3110
Work Order #: 82-2513
Account #: 007048
Date Sampled: 25 Sep 18 10:41
Date Received: 25 Sep 18 15:49
Sampled By: MVTL Field Services

Project Name: Minnkota-CCWDF

PO #: 180247

Sample Description: 92-6A

Temp at Receipt: 2.1C

Event and Year: Sept 2018

Table with columns: As Received Result, Method RL, Method Reference, Date Analyzed, Analyst. Rows include various chemical and physical tests like Total Suspended Solids, Conductivity, pH, Temperature, Alkalinity, etc.

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

@ = Due to sample matrix # = Due to concentration of other analytes
! = Due to sample quantity + = Due to internal standard response

CERTIFICATION: ND # ND-00016

MVTL guarantees the accuracy of the analysis done on the sample submitted for testing. It is not possible for MVTL to guarantee that a test result obtained on a particular sample will be the same on any other sample unless all conditions affecting the sample are the same, including sampling by MVTL. As a mutual protection to clients, the public and ourselves, all reports are submitted as the confidential property of clients, and authorization for publication of reports, conclusions or extracts from or regarding our reports is reserved pending our written approval.



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www.mvtd.com



CERTIFICATE of ANALYSIS - STATE

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 5 Oct 18
Lab Number: 18-W3110
Work Order #: 82-2513
Account #: 007048
Date Sampled: 25 Sep 18 10:41
Date Received: 25 Sep 18 15:49
Sampled By: MVTL Field Services

Project Name: Minnkota-CCWDF

Sample Description: 92-6A

PO #: 180247

Event and Year: Sept 2018

Temp at Receipt: 2.1C

Table with 6 columns: Analyte, As Received Result, Method RL, Method Reference, Date Analyzed, Analyst. Rows include Molybdenum - Dissolved, Selenium - Dissolved, and Silver - Dissolved.

* Holding time exceeded

Approved by: Claudette K Carroll (signature) 10 OCT 18
Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:
@ = Due to sample matrix
! = Due to sample quantity
= Due to concentration of other analytes
+ = Due to internal standard response

CERTIFICATION: ND # ND-00016

MVTL guarantees the accuracy of the analysis done on the sample submitted for testing. It is not possible for MVTL to guarantee that a test result obtained on a particular sample will be the same on any other sample unless all conditions affecting the sample are the same, including sampling by MVTL. As a matter of protection to clients, the public and ourselves, all reports are submitted as the confidential property of clients, and authorization for publication of reports, conclusions or extracts from or regarding our reports is reserved pending our written approval.



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CERTIFICATE of ANALYSIS - STATE

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 5 Oct 18
Lab Number: 18-W3111
Work Order #: 82-2513
Account #: 007048
Date Sampled: 25 Sep 18 13:07
Date Received: 25 Sep 18 15:49
Sampled By: MVTL Field Services

Project Name: Minnkota-CCWDF

PO #: 180247

Sample Description: 92-3

Temp at Receipt: 2.1C

Event and Year: Sept 2018

Table with columns: As Received Result, Method RL, Method Reference, Date Analyzed, Analyst. Rows include various chemical and physical tests like Metal Digestion, Total Suspended Solids, pH, Temperature, etc.

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:
* = Due to sample matrix # = Due to concentration of other analytes
! = Due to sample quantity + = Due to internal standard response

CERTIFICATION: ND # ND-00016

MVTL guarantees the accuracy of the analysis done on the sample submitted for testing. It is not possible for MVTL to guarantee that a test result obtained on a particular sample will be the same on any other sample unless all conditions affecting the sample are the same, including sampling by MVTL. As a mutual protection to clients, the public and ourselves, all reports are submitted as the confidential property of clients, and authorization for publication of statements, quotations or extracts from or regarding our reports is reserved pending our written approval.



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CERTIFICATE of ANALYSIS - STATE

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 5 Oct 18
Lab Number: 18-W3111
Work Order #: 82-2513
Account #: 007048
Date Sampled: 25 Sep 18 13:07
Date Received: 25 Sep 18 15:49
Sampled By: MVTL Field Services

Project Name: Minnkota-CCWDF

PO #: 180247

Sample Description: 92-3

Temp at Receipt: 2.1C

Event and Year: Sept 2018

Table with 6 columns: Analyte, As Received Result, Method RL, Method Reference, Date Analyzed, Analyst. Rows include Molybdenum, Selenium, and Silver.

* Holding time exceeded

Approved by:

Claudette K. Carroll

CC
10 OCT 18

Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

- ⊙ = Due to sample matrix
! = Due to sample quantity
= Due to concentration of other analytes
+ = Due to internal standard response

CERTIFICATION: ND # ND-00016

MVTL guarantees the accuracy of the analysis done on the sample submitted for testing. It is not possible for MVTL to guarantee that a test result obtained on a particular sample will be the same on any other sample unless all conditions affecting the sample are the same, including sampling by MVTL. As a mutual protection to clients, the public and ourselves, all reports are submitted as the confidential property of clients, and authorization for publication of statements, conclusions or extracts from or regarding our reports is reserved pending our written approval.



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CERTIFICATE of ANALYSIS - STATE

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 5 Oct 18
Lab Number: 18-W3112
Work Order #: 82-2513
Account #: 007048
Date Sampled: 25 Sep 18 14:50
Date Received: 25 Sep 18 15:49
Sampled By: MVTL Field Services

Project Name: Minnkota-CCWDF

PO #: 180247

Sample Description: 95-4

Temp at Receipt: 2.1C

Event and Year: Sept 2018

Table with columns: As Received Result, Method RL, Method Reference, Date Analyzed, Analyst. Rows include various chemical tests like Metal Digestion, Total Suspended Solids, Conductivity, pH, Temperature, Alkalinity, etc.

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

- @ = Due to sample matrix
! = Due to sample quantity
= Due to concentration of other analytes
+ = Due to internal standard response

CERTIFICATION: ND # ND-00016

MVTL guarantees the accuracy of the analysis done on the sample submitted for testing. It is not possible for MVTL to guarantee that a test result obtained on a particular sample will be the same on any other sample unless all conditions following the sample are the same, including sampling by MVTL. As a mutual protection to clients, the public and ourselves, all reports are submitted as the confidential property of clients, and authorization for publication of statements, conclusions or extracts from or regarding our reports is reserved pending our written approval.



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CERTIFICATE of ANALYSIS - STATE

Scott Hopfauf
 Minnkota Power Cooperative
 3401 24th St SW
 Center ND 58530

Report Date: 5 Oct 18
 Lab Number: 18-W3112
 Work Order #: 82-2513
 Account #: 007048
 Date Sampled: 25 Sep 18 14:50
 Date Received: 25 Sep 18 15:49
 Sampled By: MVTL Field Services

Project Name: Minnkota-CCWDF

PO #: 180247

Sample Description: 95-4

Temp at Receipt: 2.1C

Event and Year: Sept 2018

	As Received Result	Method RL	Method Reference	Date Analyzed	Analyst
Molybdenum - Dissolved	< 0.002 mg/l	0.0020	6020B	27 Sep 18 18:24	BB
Selenium - Dissolved	< 0.005 mg/l	0.0050	6020B	27 Sep 18 18:16	CC
Silver - Dissolved	< 0.0005 mg/l	0.0005	6020B	27 Sep 18 18:24	BB

* Holding time exceeded

Approved by:

Claudette K. Carroll

CC
10 OCT 18

Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

- 0 = Due to sample matrix
- ! = Due to sample quantity
- ¶ = Due to concentration of other analytes
- * = Due to internal standard response

CERTIFICATION: ND # ND-00016

MVTL guarantees the accuracy of the analysis done on the sample submitted for testing. It is not possible for MVTL to guarantee that a test result obtained on a particular sample will be the same on any other sample unless all conditions affecting the sample are the same, including sampling by MVTL. As a mutual protection to clients, the public and ourselves, all reports are submitted as the confidential property of clients, and authorization for publication of statements, conclusions or extracts from or regarding our reports is reserved pending our written approval.



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CERTIFICATE of ANALYSIS - STATE

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 6 Jun 18
Lab Number: 18-W1293
Work Order #: 82-1116
Account #: 007048
Date Sampled: 22 May 18 13:07
Date Received: 24 May 18 8:00
Sampled By: MVTL Field Services

Project Name: Minnkota-CCWDF

PO #: 180247

Sample Description: 97-1

Temp at Receipt: 3.9C

Event and Year: May 2018

Table with columns: As Received Result, Method RL, Method Reference, Date Analyzed, Analyst. Rows include various chemical and physical tests like Total Suspended Solids, Conductivity, pH, Temperature, Alkalinity, etc.

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

- * = Due to sample matrix
! = Due to sample quantity
= Due to concentration of other analytes
+ = Due to internal standard response

CERTIFICATION: ND # ND-00016

MVTL guarantees the accuracy of the analysis done on the sample submitted for testing. It is not possible for MVTL to guarantee that a test result obtained on a particular sample will be the same as any other sample unless all conditions affecting the sample are the same, including sampling by MVTL. As a mutual protection to clients, the public and ourselves, all reports are submitted as the confidential property of clients, and authorization for publication of statements, conclusions or extracts from or regarding our reports is reserved pending our written approval.



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CERTIFICATE of ANALYSIS - STATE

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 6 Jun 18
Lab Number: 18-W1293
Work Order #: 82-1116
Account #: 007048
Date Sampled: 22 May 18 13:07
Date Received: 24 May 18 8:00
Sampled By: MVTL Field Services

Project Name: Minnkota-CCWDF

Sample Description: 97-1

PO #: 180247

Event and Year: May 2018

Temp at Receipt: 3.9C

Table with 6 columns: Analyte, As Received Result, Method RL, Method Reference, Date Analyzed, Analyst. Rows include Molybdenum, Selenium, and Silver.

* Holding time exceeded

Approved by:

Claudette K Carroll

16 Jun 18

Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL - Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

- - Due to sample matrix
! - Due to sample quantity
- Due to concentration of other analytes
+ - Due to internal standard response

CERTIFICATION: ND # ND-00016



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CERTIFICATE of ANALYSIS - STATE

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 6 Jun 18
Lab Number: 18-W1294
Work Order #: 82-1116
Account #: 007048
Date Sampled: 23 May 18 12:40
Date Received: 24 May 18 8:00
Sampled By: MVTL Field Services

Project Name: Minnkota-CCWDF

Sample Description: 92-5A

PO #: 180247

Event and Year: May 2018

Temp at Receipt: 3.9C

Table with columns: As Received Result, Method RL, Method Reference, Date Analyzed, Analyst. Rows include various chemical and physical tests like Total Suspended Solids, pH, Temperature, Alkalinity, etc.

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

- Due to sample matrix
! = Due to sample quantity
= Due to concentration of other analytes
+ = Due to internal standard response

CERTIFICATION: ND # ND-00016

MVTL guarantees the accuracy of the analysis done on the sample submitted for testing. It is not possible for MVTL to guarantee that a test result obtained on a particular sample will be the same on any other sample unless all conditions affecting the sample are the same, including sampling by MVTL. As a mutual protection to clients, the public and ourselves, all reports are submitted as the confidential property of clients, and authorization for publication of statements, conclusions or extracts from or regarding our reports is reserved pending our written approval.



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CERTIFICATE of ANALYSIS - STATE

Scott Hopfauf
 Minnkota Power Cooperative
 3401 24th St SW
 Center ND 58530

Report Date: 6 Jun 18
 Lab Number: 18-W1294
 Work Order #: 82-1116
 Account #: 007048
 Date Sampled: 23 May 18 12:40
 Date Received: 24 May 18 8:00
 Sampled By: MVTL Field Services

Project Name: Minnkota-CCWDF

PO #: 180247

Sample Description: 92-5A

Temp at Receipt: 3.9C

Event and Year: May 2018

	As Received Result		Method RL	Method Reference	Date Analyzed	Analyst
Molybdenum - Dissolved	< 0.002 mg/l		0.0020	6020B	30 May 18 17:07	CC
Selenium - Dissolved	< 0.005 mg/l		0.0050	6020B	29 May 18 17:35	CC
Silver - Dissolved	< 0.0005 mg/l		0.0005	6020B	29 May 18 17:35	CC

* Holding time exceeded

Approved by:

Claudette K. Carroll

CC
16 Jun 18

Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit:

The reporting limit was elevated for any analyte requiring a dilution as coded below:
 @ = Due to sample matrix * = Due to concentration of other analytes
 i = Due to sample quantity + = Due to internal standard response

CERTIFICATION: ND # ND-00015

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1201 Lincoln Hwy. ~ Nevada, IA 50201 ~ 800-362-0855 ~ Fax 515-382-3885
www.mvtl.com



CERTIFICATE of ANALYSIS - STATE

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 6 Jun 18
Lab Number: 18-W1295
Work Order #: 82-1116
Account #: 007048
Date Sampled: 22 May 18 15:11
Date Received: 24 May 18 8:00
Sampled By: MVTL Field Services

Project Name: Minnkota-CCWDF

PO #: 180247

Sample Description: 92-6A

Temp at Receipt: 3.9C

Event and Year: May 2018

Table with columns: As Received Result, Method RL, Method Reference, Date Analyzed, Analyst. Rows include various chemical tests like Total Suspended Solids, Conductivity, pH, Temperature, etc.

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

@ = Due to sample matrix # = Due to concentration of other analytes
! = Due to sample quantity + = Due to internal standard response

CERTIFICATION: ND # ND-00016

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CERTIFICATE of ANALYSIS - STATE

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 6 Jun 18
Lab Number: 18-W1295
Work Order #: 82-1116
Account #: 007048
Date Sampled: 22 May 18 15:11
Date Received: 24 May 18 8:00
Sampled By: MVTL Field Services

Project Name: Minnkota-CCWDF

PO #: 180247

Sample Description: 92-6A

Temp at Receipt: 3.9C

Event and Year: May 2018

Table with 6 columns: Analyte, As Received Result, Method RL, Method Reference, Date Analyzed, Analyst. Rows include Molybdenum, Selenium, and Silver.

* Holding time exceeded

Approved by:

Claudette K. Carroff 16 Jun 18

Claudette K. Carroff, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:
@ = Due to sample matrix # = Due to concentration of other analytes
! = Due to sample quantity * = Due to internal standard response

CERTIFICATION: ND # ND-00016



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CERTIFICATE of ANALYSIS - STATE

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 6 Jun 18
Lab Number: 18-W1296
Work Order #: 82-1116
Account #: 007048
Date Sampled: 23 May 18 16:24
Date Received: 24 May 18 8:00
Sampled By: MVTL Field Services

Project Name: Minnkota-CCWDF

Sample Description: 92-3

PO #: 180247

Event and Year: May 2018

Temp at Receipt: 3.9C

Table with columns: As Received Result, Method RL, Method Reference, Date Analyzed, Analyst. Rows include various chemical and physical tests like Total Suspended Solids, Conductivity, pH, Temperature, etc.

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

- @ = Due to sample matrix
! = Due to sample quantity
= Due to concentration of other analytes
+ = Due to internal standard response

CERTIFICATION: ND # ND-00016

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CERTIFICATE of ANALYSIS - STATE

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 6 Jun 18
Lab Number: 18-W1296
Work Order #: 82-1116
Account #: 007048
Date Sampled: 23 May 18 16:24
Date Received: 24 May 18 8:00
Sampled By: MVTL Field Services

Project Name: Minnkota-CCWDF

PO #: 180247

Sample Description: 92-3

Temp at Receipt: 3.9C

Event and Year: May 2018

Table with 6 columns: Analyte, As Received Result, Method, Method Reference, Date Analyzed, Analyst. Rows include Molybdenum, Selenium, and Silver.

* Holding time exceeded

Approved by: Claudette K. Carroll 16 Jun 18
Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:
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CERTIFICATE of ANALYSIS - STATE

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 6 Jun 18
Lab Number: 18-W1297
Work Order #: 82-1116
Account #: 007048
Date Sampled: 23 May 18 14:26
Date Received: 24 May 18 8:00
Sampled By: MVTL Field Services

Project Name: Minnkota-CCWDF

PO #: 180247

Sample Description: 95-4

Temp at Receipt: 3.9C

Event and Year: May 2018

Table with columns: As Received Result, Method RL, Method Reference, Date Analyzed, Analyst. Rows include various chemical and physical tests like Metal Digestion, Conductivity, pH, Temperature, etc.

RL - Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:
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! = Due to sample quantity + = Due to internal standard response

CERTIFICATION: MD # MD-00016

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www.mvtl.com



CERTIFICATE of ANALYSIS - STATE

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 6 Jun 18
Lab Number: 18-W1297
Work Order #: 82-1116
Account #: 007048
Date Sampled: 23 May 18 14:26
Date Received: 24 May 18 8:00
Sampled By: MVTL Field Services

Project Name: Minnkota-CCWDF

Sample Description: 95-4

PO #: 180247

Event and Year: May 2018

Temp at Receipt: 3.9C

Table with 6 columns: Analyte, As Received Result, Method, Method Reference, Date Analyzed, Analyst. Rows include Molybdenum - Dissolved, Selenium - Dissolved, and Silver - Dissolved.

* Holding time exceeded

Approved by: Claudette K Carroll 16 Jun 18
Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL - Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:
* = Due to sample matrix
! = Due to sample quantity
= Due to concentration of other analytes
+ = Due to internal standard response

CERTIFICATION: ND # ND-00016

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APPENDIX C-3

**FOX HILLS OBSERVATION WELL 3558
ANALYSES
FOR BASELINE DATA**

MINNESOTA VALLEY TESTING LABORATORIES, INC.

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Amended 2Feb21 (TDS)

Barry Botnen
UND-Energy & Environmental
15 N. 23rd St.
Grand Forks ND 58201

Report Date: 28 Jan 21
Lab Number: 21-W40
Work Order #: 82-0072
Account #: 007033
Date Sampled: 12 Jan 21 12:45
Date Received: 12 Jan 21 14:35
Sampled By: MVTL Field Services

Project Name: Center USGS Well

PO #: B. Botnen

Sample Description: USGS Well

Temp at Receipt: 8.9C ROI

	As Received Result		Method RL	Method Reference	Date Analyzed	Analyst
Metal Digestion				EPA 200.2	12 Jan 21	HT
pH - Field	8.42	units	NA	SM 4500 H+ B	12 Jan 21 12:45	JSM
Temperature - Field	11.8	Degrees C	NA	SM 2550B	12 Jan 21 12:45	JSM
Total Alkalinity	938	mg/l CaCO3	20	SM2320B-11	12 Jan 21 17:00	HT
Phenolphthalein Alk	< 20	mg/l CaCO3	20	SM2320B-11	12 Jan 21 17:00	HT
Bicarbonate	912	mg/l CaCO3	20	SM2320B-11	12 Jan 21 17:00	HT
Carbonate	26	mg/l CaCO3	20	SM2320B-11	12 Jan 21 17:00	HT
Hydroxide	< 20	mg/l CaCO3	20	SM2320B-11	12 Jan 21 17:00	HT
Conductivity - Field	2641	umhos/cm	1	EPA 120.1	12 Jan 21 12:45	JSM
Tot Dis Solids (Summation)	1520	mg/l	12.5	SM1030-F	15 Jan 21 11:45	Calcul
Nitrate as N	< 0.2	mg/l	NA	EPA 353.2	14 Jan 21 9:17	Calcula.
Bromide	2.83	mg/l	0.100	EPA 300.0	14 Jan 21 22:24	RMV
Total Organic Carbon	1.7	mg/l	0.5	SM5310C-11	22 Jan 21 17:28	NAS
Dissolved Organic Carbon	1.7	mg/l	0.5	SM5310C-96	22 Jan 21 17:28	NAS
Fluoride	3.54	mg/l	0.10	SM4500-F-C	12 Jan 21 17:00	HT
Sulfate	< 5	mg/l	10.0	ASTM D516-11	15 Jan 21 8:50	EV
Chloride	323	mg/l	2.0	SM4500-Cl-E-11	13 Jan 21 11:25	EV
Nitrate-Nitrite as N	< 0.2	mg/l	0.20	EPA 353.2	14 Jan 21 9:17	EV
Nitrite as N	< 0.2	mg/l	0.20	EPA 353.2	14 Jan 21 7:59	EV
Phosphorus as P - Total	< 0.2	mg/l	0.20	EPA 365.1	15 Jan 21 8:17	EV
Phosphorus as P-Dissolved	< 0.2	mg/l	0.20	EPA 365.1	15 Jan 21 8:17	EV
Mercury - Total	< 0.0002	mg/l	0.0002	EPA 245.1	13 Jan 21 11:16	MDE
Mercury - Dissolved	< 0.0002	mg/l	0.0002	EPA 245.1	13 Jan 21 11:16	MDE

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

⊙ = Due to sample matrix # = Due to concentration of other analytes
! = Due to sample quantity + = Due to internal standard response

CERTIFICATION: ND # ND-00016

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Amended 2Feb21 (TDS)

Barry Botnen
UND-Energy & Environmental
15 N. 23rd St.
Grand Forks ND 58201

Report Date: 28 Jan 21
Lab Number: 21-W40
Work Order #: 82-0072
Account #: 007033
Date Sampled: 12 Jan 21 12:45
Date Received: 12 Jan 21 14:35
Sampled By: MVTL Field Services

Project Name: Center USGS Well

Sample Description: USGS Well

PO #: B. Botnen

Temp at Receipt: 8.9C ROI

Table with 6 columns: Analyte, As Received Result, Method RL, Method Reference, Date Analyzed, and Analyst. Lists various chemical elements and their concentrations.

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

@ = Due to sample matrix # = Due to concentration of other analytes
! = Due to sample quantity + = Due to internal standard response

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Amended 2Feb21 (TDS)

Barry Botnen
 UND-Energy & Environmental
 15 N. 23rd St.
 Grand Forks ND 58201

Report Date: 28 Jan 21
 Lab Number: 21-W40
 Work Order #: 82-0072
 Account #: 007033
 Date Sampled: 12 Jan 21 12:45
 Date Received: 12 Jan 21 14:35
 Sampled By: MVTL Field Services

Project Name: Center USGS Well

PO #: B. Botnen

Sample Description: USGS Well

Temp at Receipt: 8.9C ROI

	As Received Result		Method RL	Method Reference	Date Analyzed	Analyst
Arsenic - Total	< 0.002	mg/l	0.0020	6020B	14 Jan 21 19:47	MDE
Barium - Total	0.0966	mg/l	0.0020	6020B	14 Jan 21 19:47	MDE
Beryllium - Total	< 0.0005	mg/l	0.0005	6020B	14 Jan 21 19:47	MDE
Cadmium - Total	< 0.0005	mg/l	0.0005	6020B	14 Jan 21 19:47	MDE
Chromium - Total	< 0.002	mg/l	0.0020	6020B	14 Jan 21 19:47	MDE
Cobalt - Total	< 0.002	mg/l	0.0020	6020B	14 Jan 21 19:47	MDE
Copper - Total	< 0.002	mg/l	0.0020	6020B	14 Jan 21 19:47	MDE
Lead - Total	0.0006	mg/l	0.0005	6020B	14 Jan 21 19:47	MDE
Manganese - Total	0.0088	mg/l	0.0020	6020B	14 Jan 21 19:47	MDE
Molybdenum - Total	0.0058	mg/l	0.0020	6020B	14 Jan 21 19:47	MDE
Nickel - Total	< 0.002	mg/l	0.0020	6020B	14 Jan 21 19:47	MDE
Selenium - Total	< 0.005	mg/l	0.0050	6020B	14 Jan 21 19:47	MDE
Silver - Total	< 0.0005	mg/l	0.0005	6020B	14 Jan 21 19:47	MDE
Thallium - Total	< 0.0005	mg/l	0.0005	6020B	14 Jan 21 19:47	MDE
Vanadium - Total	< 0.002	mg/l	0.0020	6020B	14 Jan 21 19:47	MDE
Antimony - Dissolved	< 0.001	mg/l	0.0010	6020B	15 Jan 21 14:56	MDE
Arsenic - Dissolved	< 0.002	mg/l	0.0020	6020B	15 Jan 21 14:56	MDE
Barium - Dissolved	0.0954	mg/l	0.0020	6020B	15 Jan 21 14:56	MDE
Beryllium - Dissolved	< 0.0005	mg/l	0.0005	6020B	15 Jan 21 14:56	MDE
Cadmium - Dissolved	< 0.0005	mg/l	0.0005	6020B	15 Jan 21 14:56	MDE
Chromium - Dissolved	< 0.002	mg/l	0.0020	6020B	15 Jan 21 14:56	MDE
Cobalt - Dissolved	< 0.002	mg/l	0.0020	6020B	15 Jan 21 14:56	MDE
Copper - Dissolved	< 0.002	mg/l	0.0020	6020B	15 Jan 21 14:56	MDE

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CERTIFICATION: ND # ND-00016

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UND-Energy & Environmental
15 N. 23rd St.
Grand Forks ND 58201

Report Date: 28 Jan 21
Lab Number: 21-W40
Work Order #: 82-0072
Account #: 007033
Date Sampled: 12 Jan 21 12:45
Date Received: 12 Jan 21 14:35
Sampled By: MVTL Field Services

Project Name: Center USGS Well

Sample Description: USGS Well

PO #: B. Botnen

Temp at Receipt: 8.9C ROI

Table with 6 columns: Analyte, As Received Result, Method RL, Method Reference, Date Analyzed, Analyst. Rows include Lead, Manganese, Molybdenum, Nickel, Selenium, Silver, Thallium, and Vanadium.

^ Elevated result due to instrument performance at the lower limit of quantification (LLOQ).

Approved by: Claudette K Carroll

Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

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! = Due to sample quantity + = Due to internal standard response

CERTIFICATION: ND # ND-00016

APPENDIX D

**TESTING AND MONITORING – QUALITY
CONTROL AND SURVEILLANCE PLAN**

TESTING AND MONITORING – QUALITY CONTROL AND SURVEILLANCE PLAN Tundra SGS (Secure Geological Storage)

1. PROJECT MANAGEMENT AND SURVEILLANCE PROCESS

From conception to closure, Tundra SGS operation will include the participation of multidisciplinary teams of government representatives, researchers, operator staff, consultants, and subcontractors. Each of these teams are highly specialized and recognized in their specific areas of expertise, providing technical and economic inputs to the project in order to ensure a safe, successful, and efficient operation.

Characterization of the reservoirs, seals, and subsurface features has been done by experienced professionals in geosciences from the Energy & Environmental Research Center (EERC), Oxy Low Carbon Ventures (OLCV), Schlumberger, etc., led by Minnkota Power Cooperative, Inc., applying the latest technology in logging and testing equipment as well as industry recognized software and techniques for modeling and simulations.

The main flowline, surface equipment, and well designs comply with industry standards for carbon dioxide (CO₂) material selection and operating conditions to guaranty mechanical integrity of the system during the life of the project and have been prepared by specialized companies such as Burns & McDonnell and OLCV.

Monitoring programs for leak detection, corrosion, and surveillance have been tailored for the site to ensure protection of underground sources of drinking water (USDWs), the environment, and communities; ensure the mechanical integrity of storage; maximize operating time; and extend the life of the assets. These plans incorporate best practices and recommendation for carbon capture and storage projects worldwide as well as the experience of years of development in enhanced oil recovery (EOR) fields.

As part of the quality control (QC) process, during testing and surveillance, most of the samples collected and data gathered will be analyzed, processed, validated, or witnessed by third parties independent and outside of the operator staff.

For specialized data such as seismicity and distributed temperature sensing (DTS), the project will have additional support from the provider of the selected technologies to perform QC and verification of the data as well as calibration of the systems as needed.

Sensors, transducers and controllers will be connected in a central platform (supervisory control and data acquisition [SCADA] system) to monitor the operating conditions, set alarms for malfunction, and establish safety protocols in case of abnormal conditions in the system. Data interfaces will be created for equipment that is not linked directly to the SCADA system, to be integrated in a unique surveillance platform.

The operating parameters, monitoring values, laboratory results, reports, and surveillance documents for the project will be stored in a central database to provide support for area of review (AOR) reviews, quality assurance (QA) programs, and reporting.

The project established a key staffing position that will ensure reliable operation with the highest standard of quality and surveillance procedures as well as accurate storage evaluation and reporting. Some of the staff will be dedicated full time to the operation, and others will be as required by AOR reviews, maintenance activities, or specific activities of the project.

Once the project is in operation, the Tundra SGS operator will maintain a contact list with the specific names of the individuals in each position and will keep that list updated.

1.1 Operator Organizational Chart

Figure D-1 shows the operator organizational chart for Tundra SGS.

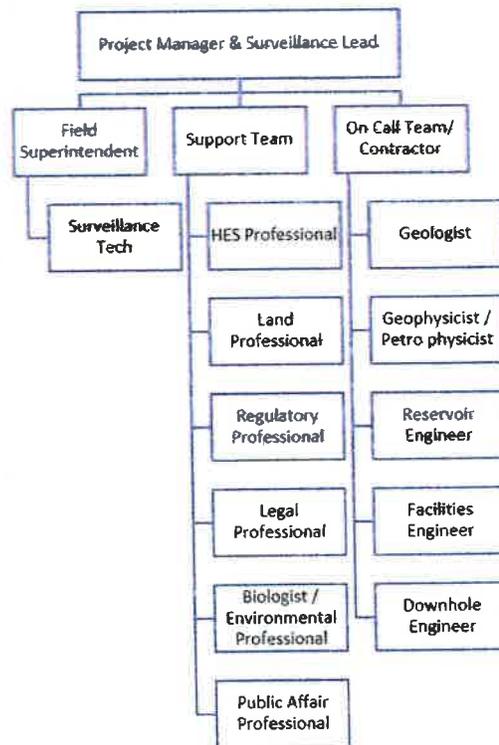


Figure D-1. Operator organizational chart.

A brief description of full-time positions is as follows:

- **Project Manager:** The project manager (PM) plays a central role in the implementation of all data gathering and analysis for the Tundra SGS project and provides overall coordination and responsibility for all organizational and administrative aspects. The PM is responsible for the planning, funding, schedules, and controls needed to implement project plans. The PM is responsible to enforce the data validation process and perform surveillance on the site.
- **Field Superintendent:** The field superintendent (FS) is responsible to ensure operating procedures are followed and any deviation from set parameters is corrected. The FS is responsible to verify surveillance is being performed and data are being communicated and reported properly. The FS is responsible to ensure all personnel comply with the safety worker plan and policies of the operator. The FS is the focal point for activation of the emergency response and remedial plan. The FS is responsible to coordinate personnel and contractors on the site.
- **Surveillance Technician:** The surveillance technician (ST) is responsible for the surveillance of the system on the field. The position is 24/7 and requires an experience SCADA operator to monitor the sequestration complex, clear alarms, and troubleshoot deviation from normal operation.

Additional to the key staffing positions and specialized consultants identified in the above sections, the project will have the support of additional subcontractors based on the scope of the work to be performed.

1.2 Data Verification and Validation

The project will establish a standardized program to validate the data and acquisition methods. The program will verify that collected data are reasonable, were processed and analyzed correctly, and are free of errors. Peer reviews or third-party consultant will be used as a QC mechanism to verify the information. If issues are identified during a peer review, they will be addressed and corrected by the data owner. If an error is identified in data under validation, in addition to correcting the error, affected work products and management decisions will be identified, affected users will be notified, and corrective actions will be coordinated to ensure that the extent of the error's impact is fully addressed.

1.3 Management of Change (MOC)

The project will implement a MOC procedure to communicate and document any deviation from facilities designs, policies, operational parameters, standard operating procedures, etc. The MOC procedure aims to control major deviations in cost.

1.4 Contractor Requirements

Each contractor will follow a qualification process defined by the operator, before being authorized to execute work in the site. Each contractor providing service to Tundra SGS must provide a copy of its QA/QC and safety management program before it is qualified to perform the work and might be audited by the operator's subject matter experts. All contractors are required to comply with the

Worker Safety Program described in this permit as well as the operator's policies at the working site. The operator reserves the right to inspect and audit contractors' operation and quality program to guaranty safety and quality programs are being followed.

1.5 Special Training/Certifications

Wireline logging, indirect geophysical methods, and some nonroutine sampling will be performed by trained, qualified, and certified personnel, according to the service company's requirements.

Routine injectate and groundwater sampling will be performed by trained personnel; no specialized certifications are required. Some special training will be required for project personnel, particularly in the areas of pulsed-neutron capture (PNC) logging interpretation, certain geophysical methods, certain data acquisition/transmission systems, and certain sampling technologies.

Training of project staff will be conducted by existing project personnel knowledgeable in project-specific sampling procedures. Training documentation will be maintained as project QA records.

1.6 Documentation, Records and Reporting

All data and project records will be stored electronically on secure servers and routinely backed up. Reporting will comply with North Dakota Administrative Code (NDAC) § 43-05-01-18.

2. TESTING AND MONITORING TECHNIQUES QA/QC

2.1 Logging Program

The logging program is described in detailed in the testing and monitoring section of the permit. These activities are executed by specialized contractors with proven technology in the oil and gas industry. Calibration and QC of the tools will follow specific protocols and procedures based on the provider. Example of data sheets for the different formation evaluation tools are included in the Appendix D-1 of this document as reference only.

2.1.1 Ultrasonic Casing Inspection Tool, Isolation Scanner, and Electromagnetic Pipe Examiner

For mechanical integrity evaluation, the Tundra SGS monitoring program proposed ultrasonic and electromagnetic tools that evaluate the conditions of the tubulars in the well and provide information about thickness, ovality, ruptures, potential corrosion, etc. Table D-1 provides basic data for each tool.

2.1.2 Pulsed-Neutron Logging

Pulsed-neutron logging is considered a proven technique to detect gas saturation in reservoirs. Advances in the technology have improved the accuracy of the tool to track the movement of the CO₂ plumes in the reservoir and evaluate flow conformance. Table D-2 shows basic specifications of the tools based on the provider.

Table D-1. Types of Data Provided by Individual Tools

Logging Type	Isolation Scanner	USIT	EM Pipe Xaminer	EM Pipe Scanner	CAST-XR
Acquisition	Real time	Real time	Real time	Real time	Real time
Logging Speed	2,700 ft/h	1800 ft/h	900 ft/h	1,800–3,600 ft/h	3,600 ft/h
Thickness Measurement Accuracy				EM thickness 15%	± 0.05 in.
Range of Measurement	0 to 10 Mrayl	0 to 10 Mrayl		1.5 in.	0–10 Mrayl
Mud Type Limitations	None	None	None	None	None
Temperature Rating	350°F	350°F	350°F	302°F	350°F
Pressure Rating	20,000 psi	20,000 psi	15,000 psi	15,000 psi	20,000 psi
Casing Size Min.	4 ½ in.	4½ in.	2.38 in.	2¾ in.	4.67 in.
Casing Size Max.	9¾ in.	13¾ in.	24 in.	13¾ in.	20 in.
Outside Diameter	3.37 in.	3.375 in.	1.69 in.	2.125 in.	3.625 in.
Length	19.73 ft	19.75 in.	17.34 ft	19.7 ft	17.9 ft
Weight	333 lb	333 lb	87 lb	110 lb	316 lb
1st Pipe Defect Detection Accuracy			1%	± 0.05 in	
1st Pipe (2Cs) Accuracy			2% or 0.015 in		
Total Metal Thickness 1.2 In (3Cs) Overall Average			7%		
Total Metal Thickness 1.8 In (4Cs) Overall Average			10%		

Table D-2. Data Specifications for the Pulsed-Neutron Logging Tool

Logging Type	Pulsar ¹ – Neutron	TMD3D ² Pulse Neutron
Acquisition	Real time	Real time
Logging Speed	200–3,600 ft/h	60–1,800 ft/h
Depth of Investigation		10–14 in.
Vertical Resolution		24 in.
Range of Measurement	0 to 60 pu	5 to 60 pu
Mud Type Limitations	None	None
Temperature Rating	350°F	300°F
Pressure Rating	15,000 psi	15,000 psi
Casing Size Min.	2¾ in.	2 in.
Casing Size Max.	9¾ in.	16 in.
Outside Diameter	1.72 in.	1.69 in.
Length	18.3 ft	14.25 ft
Weight	88 lb	35 lb

¹ Pulsar – Schlumberger technology.

² TMD3D – Halliburton technology.

2.2 Mud-Logging Sampling

Mud-logging samples must be collected from surface to final total depth (TD), every 30 ft maximum. The samples must be washed, dried, and placed in standard envelopes, and packed in the correct order into standard sample boxes. The sample boxes must be identified with a label indicating operator, well name, well file number, API number, and location and depth of samples and forwarded to the state core and sample library within 30 days of the completion of drilling operations.

2.3 Coring or Sidewall Coring (SWC) Sampling

The coring program is described in detailed in the specific drilling and completion program of the wells. The coring provider must provide tools in good condition and according to the program discussed with the technical team. Operators reserve the right to inspect the tools and request a replacement if substandard conditions are detected. The coring provider must provide the tools to cut, retrieve, and stabilize the core to get the maximum possible recovery factor. All cores or SWCs taken shall be preserved, placed in a standard core box, and the entire core forwarded to the state core and sample library, free of cost, within 180 days after completion of drilling operations.

2.4 MDT In Situ Stress Testing

The Schlumberger MDT (modular dynamics testing) tool delivers real-time formation temperature and pressure measurements and fluid sampling. The tools for formation pressure measurements incorporate a wireline-conveyed tester with a dual packer module, with two probes for pressure measurements, pumps, a flow control module, and sample chambers (Appendix D-2). Reservoir pressure measurements require inserting a probe into the reservoir and withdrawing a small amount of fluid. The pressure gauge is exposed to many temperature and pressure changes and has high resolution to accurately measure the dynamic conditions. Precise flowline control during testing and sampling ensures monophasic flow, delivering accurate permeability. In situ reservoir stress testing measurements provide formation breakdown, propagation, and closure pressures.

The dual-packer module (MRPA) is used to isolate formation intervals to provide enhanced data because the cross-sectional area of the isolated interval is greater than the standard MDT probe. This small interval lowers the wellbore storage effects. The MRPA is used to take pressure measurements and fluid samples in unconsolidated formations.

The MDT tool allows the measurements of the in situ reservoir stresses without breaking into confining zones. The tool creates a controlled fracture in the isolated zone and measures the related pressure response. The created fracture plane is perpendicular to the direction of the minimum in situ stress. The fracture is reopened and closed for measurement repeatability, with several constant rate injection cycles. The repeated cycles assist the fracture to grow beyond hoop stresses to sense far-field stresses accurately.

MDT interpretation software provides real-time plotting of pressure, resistivity, and optical properties versus time. This capability is essential for real-time QC and ongoing optimization of the job. Using the InterACT* wellsite-monitoring and control system provides real-time data transfer to remote sites.

2.4.1 Tool Limitations

Schlumberger's dual-packer mechanical specifications were set with a maximum differential pressure between the upper packer and the hydrostatic pressure of 5500 psi (Appendix D-3). This limited the maximum injection pressure during the microfracture stress tests in the formations, which caused certain tests to be unsuccessful.

2.5 Formation Pressure and Fluid Sampling

The self-sealing Saturn * 3D radial probe delivers circumferential flow in the formation around the wellbore to obtain representative formation fluid samples and provides downhole fluid analysis and complete pressure surveys (Appendix D-4). In the water-based mud environment, the MDT flowline resistivity measurement helps discriminate between fluid contaminated by mud filtrate and formation oil or freshwater. Formation pressure testing similarly requires fluid withdrawal.

2.6 Analysis of Injected CO₂

The CO₂ injection stream will be continuously monitored at the surface for pressure, temperature, and flow as part of the instrumentation and control systems of the site. Quarterly samples will be collected and analyzed to track CO₂ composition and purity. Based on the anticipated composition of the CO₂ stream, a list of parameters has been identified for analysis.

Additional to the parameters listed in Table D-3, isotopic signatures of the CO₂ stream will be analyzed as baseline for potential use in monitoring techniques.

Table D-3. CO₂ Stream Analysis

Parameter	Frequency
Pressure, psi	Continuous
Temperature, °F	Continuous
CO ₂ , %	Quarterly
Water, ppm	Quarterly
Nitrogen, ppm	Quarterly
Oxygen, ppm	Quarterly
Argon, ppm	Quarterly
Hydrogen, %	Quarterly
Sulfur Dioxide SO ₂ , ppm	Quarterly
Nitrogen Dioxide NO ₂ , ppm	Quarterly
Nitric Oxide NO, ppm	Quarterly
Hydrogen Sulfide, ppm	Quarterly

2.6.1 Sampling and Custody

CO₂ sampling will be performed upstream or downstream of the flowmeter. Sampling procedures will follow contractor protocols to ensure the sample is representative of the injectant, and samples will be processed, packaged, and shipped to the contracted laboratory following standard sample handling and chain-of-custody guidance (U.S. Environmental Protection Agency [EPA] 540-R-09-03 or equivalent). Sampling tubing, connectors and valves required to sample the CO₂ gas stream will be supplied by the analytical lab providing the sampling containers.

Once the samples are analyzed, the laboratory will be responsible of properly disposed containers and residues.

2.6.2 *Equipment and Calibration*

For sampling, field equipment will be maintained, serviced, and calibrated in accordance with manufacturer recommendations. Spare parts that may be needed during sampling will be included in supplies on hand during field sampling. For all laboratory equipment, testing, inspection, and maintenance will be the responsibility of the analytical laboratory in accordance with method-specific protocols and the laboratory's QA program. The Tundra SGS operator reserve the right to audit the protocols and methods of the selected laboratory prior to awarding the work.

Calibration of all laboratory instrumentation/equipment will be the responsibility of the analytical laboratory in accordance with method-specific protocols and the laboratory's QA program, which will be reviewed by the alliance prior to contract award.

2.6.3 *Personnel and Training*

Sampling will be performed by trained personnel from the laboratory at the beginning of the operation, and the field staff will be trained in the procedures and protocols to take the samples.

2.6.4 *Analytical Method*

Table D-4 shows analytical parameters and methods.

Table D-4. Example Analytical Parameters and Methods

Analytical Parameter	Analytical Method	Detection Limit	Typical Precision/Accuracy
CO ₂	GC/TCD ¹	1 ppm to 100%	± 1% of full scale
Water	GC/HID ²	1 ppm to 100%	± 10%
Nitrogen	GC/TCD	1 ppm to 100%	± 1% of full scale
Oxygen	GC/TCD	1 ppm to 100%	± 1% of full scale
Argon	GC/TCD	1 ppm to 100%	± 1% of full scale
Hydrogen	GC/TCD	1 ppm to 100%	± 1% of full scale
Sulfur Dioxide	GC/FPD ³	0 to 500 (ppmv)	± 2% of full scale
Nitrogen Dioxide	Colorimetric	0.2 to 5 µL/L (ppmv)	± 20%
Nitric Oxide	Colorimetric	0.2 to 5 µL/L (ppmv)	± 20%
Hydrogen Sulfide	GC/FPD	0 to 500 ppm	± 2% of full scale

¹ GC/TCD – gas chromatography with a thermal conductivity detector.

² GC/HID – gas chromatography with helium ionization detector.

³ GC/FPD – gas chromatography with flame photometric detector.

Additional to compositional gas, the samples will be analyzed during the baseline period to identify the isotopes in Table D-5.

Table D-5. Isotopes to Be Identified During Baseline Sampling

Hydrocarbons	Method
$\delta^{13}\text{C}$ and ^{14}C of CO_2	GC-IRMS, AMS for ^{14}C

GC-IRMS, AMS = gas chromatography-isotope-ratio mass spectrometry/accelerator mass spectrometry.

2.6.4 Quality Control

If CO_2 composition shows abnormal values during the testing period, the project will perform a validation of the sampling process. A new sample will be collected by the laboratory technician and sent to the testing facilities for verification.

2.7 Corrosion Coupons

Samples of injection well materials (coupons) will be monitored for signs of corrosion to verify that the well components meet the minimum standards for material strength and performance and to identify well maintenance needs. Coupons shall be collected and sent quarterly to a third-party company for analysis conducted in accordance with NACE (National Institute of Corrosion Engineers) Standard SP-0775-2018-SG to determine and document corrosion wear rates based on mass loss.

2.7.1 Sampling and Custody

Prior to installation of the corrosion-monitoring flow-through corrosion coupon test system, the following information should be recorded: coupon serial number, installation date, identification (ID) of the location in the system, and orientation of the coupon and holder. The coupon should be handled carefully to avoid contamination.

The field operator will collect the coupons and identify them by serial number, date, company name, ID of the location, ID of where the coupon was removed from, and the field operator name. The field operator will visually inspect the coupon for signs of erosion, pitting, scale, or other damage and take a photograph before packing the sample. The coupon will be protected from contamination by oxidation and handling, placing the coupon in a moisture-proof or special envelope impregnated with volatile corrosion inhibitor, and shipped immediately to the laboratory for analysis.

There is no special training required to collect the coupons; however, the field operator will be trained in best practices to keep the coupon for contamination, and process refreshers will be provided as part of the continuous training process.

2.7.2 Equipment and Calibration

The preparation, cleaning, and evaluation of the corrosion specimens will be handled by a certified third-party contractor and will follow NACE RP0775-2005 or equivalent. The contractor is responsible for the calibration and maintenance of the measurement equipment as well as the disposal of the samples when the analysis is finished.

2.7.3 Analytical Method

Table D-6 shows the analytical methods to be used for sampling.

Table D-6. Analytical Method to Be Used for Sampling

Parameters	Analytical Method	Resolution Instruments	Precisions/Std Dev
Mass	NACE SP0775-2018-SC	0.05 mg	±2%
Thickness	NACE SP0775-2018-SC	0.01 mm	± 0.05 mm

NACE SP0775-2018-SC: Preparation, Installation, Analysis, and Interpretation of Corrosion Coupons in Oilfield Operations.

2.7.4 Quality Control

The operators reserve the right to audit the QA/QC procedures prior to awarding the work to a contractor and during the execution of the service to ensure the quality and safety program are being followed.

2.7.5 Typical Corrosion Coupon Report

Figure D-2 provides an example typical corrosion coupon report.

RP0775-2005

Appendix A—Typical Corrosion Coupon Report

Lease or facility _____ Well number _____

Well or facility type _____

Flowrates—Oil, m³/d (BOPD) _____ Water, m³/d (BWPD) _____

Gas, m³/d (MMCFPD) _____

Temperature _____ °C (°F) Pressure _____ MPa (psig)

Fluid analysis (attach if lengthy) _____

Gas analysis (attach if lengthy) _____

Coupon location in system _____

Sketch of system with coupon position shown: _____

Coupon number _____ Material _____

Surface finish _____ Exposed area _____

Dimensions _____

Installation date _____ Installation mass _____

Removal date _____ Removal mass _____

Days in system _____ Mass after cleaning _____

Mass loss _____

Average corrosion rate _____ mm/yr (mpy)

Deepest measured pit _____ mm (mil) Maximum pitting rate _____ mm/yr (mpy)

Description of deposit before cleaning _____

Analysis of deposit _____

Description of coupon after cleaning (e.g., etch, pitting, erosion, etc.) _____

Chemical treatment during exposure _____

Other remarks _____

Figure D-2. Example typical corrosion coupon report.

2.8 Soil Gas Sampling

The method for soil gas sampling is described in Appendix C of the permit. The samples will be sent to a specialized laboratory to determine gas composition and perform isotopic analysis to characterize the fluid and get a fingerprint for appropriation. In between sampling events, a handheld device should be enough for routine monitoring purposes, which could be done monthly.

2.8.1 Analytical Method

Compositional analysis of the gases includes chromatographic determination of the concentrations of fixed gases and hydrocarbons listed in Table D-7.

Table D-7. Fixed Gas and Hydrocarbons for Compositional Analysis

Fixed Gases		Method
Nitrogen	N ₂	GC
Oxygen	O ₂	GC
Argon	Ar	GC
Carbon Dioxide	CO ₂	GC
Carbon Monoxide	CO	GC
Hydrogen	H ₂	GC
Helium	He	GC
Hydrocarbons		Method
Methane	CH ₄	GC
Ethane	C ₂ H ₆	GC
Ethylene	C ₂ H ₄	GC
Propane	C ₃ H ₈	GC
Propylene	C ₃ H ₆	GC
Isobutane	iC ₄ H ₁₀	GC
Normal Butane	nC ₄ H ₁₀	GC
Isopentane	iC ₅ H ₁₂	GC
Normal Pentane	nC ₅ H ₁₂	GC
Hexanes Plus	C ₆ +	GC

In addition to compositional gas analysis, the samples will be analyzed during the baseline period to identify the isotopes in Table D-8.

Table D-8. Isotopes to Be Identified During Baseline Sampling

Hydrocarbons	Method
$\delta^{13}\text{C}$ and ^{14}C of CO ₂ and CH ₄	GC-IRMS, AMS for ^{14}C
δD of CH ₄	GC-IRMS

Isotopes are different forms of the same element, differing only in the number of neutrons in the nucleus of the atom. Although some isotopes are unstable and decay radioactively, most are

stable. Isotopes are valuable tools to distinguish the source of the element and create a fingerprint of the gas.

2.8.2 Equipment and Calibration

Calibration will be performed in accordance with manufacturer protocol. Sampling will be performed by trained or specialized personnel from the lab at the beginning of the operation, and the field operator will be trained in the process to be able to take samples and monitor gas composition with handheld devices as routine operation.

2.9 Water Sampling

2.9.1 Sampling and Custody

2.9.1.1 Sampling Flowing Surface Waters (rivers, streams, drainage ditches)

- Surface water samples at both flowing water and still water sites will be collected using the nonisokenetic (bottles or bailers) sampling method. Field measurement instruments will be calibrated in accordance with manufacturer instructions.
- Before samples are collected, the sample-wetted portions of most of the collection and processing equipment require a field rinse with native water. Field rinsing helps to condition sampling equipment to the sample environment. Rinsing also serves to ensure that all cleaning solution residues have been removed. An area of low-flow turbidity should be located at the sampling site to partially fill and rinse the bottle sampler, trying to avoid getting sand or sediment in the sampler.
- Location and site conditions will be recorded on the field data sheets (i.e., GPS [global positioning system] coordinates, air temperature, wind speed, precipitation, and barometric pressure). An area will be identified in the flowing water body where the water is well mixed laterally and vertically. In general, downstream samples should be collected first followed by upstream samples to minimize disturbance of bottom sediments. Extreme caution should be taken wading in fast-flowing water, and every attempt should be made to utilize a sampling device that does not require wading. In general, personnel shall not wade into flowing water when the product of depth (in feet) and velocity (in feet per second) equals 10 or greater. If flow data are not available, personnel shall not exceed a water depth of knee height. For sample locations that are considerable distance from the shoreline, a boat, dock, or bridge may be employed for sampling.
- Using a bottle, the sample should be collected by standing downstream of the bottle. Care must be taken to avoid collecting particulates that might be resuspended as the result of wading.
- Following the manufacturer instructions for the YSI multiparameter meter and the HANNA chemistry kits, the following measurements should be taken on the first sample collected: temperature, pH, conductivity, dissolved oxygen (DO), total dissolved solids (TDS), oxidation reduction potential (ORP), CO₂, alkalinity calcium carbonate (CaCO₃), and chloride (Cl). Measurements should be recorded on the field data sheet.

- Sample containers should be filled and samples filtered and/or preserved according to instructions in Section 7.0. Date and time of sampling should be recorded on the field data sheet.
- Samples should be labeled with the name of the person sampling, sample description, date, and time. The chain-of-custody form should also be completed.
- Any unusual conditions or deviations from the sampling procedure should be documented on the field data sheet.

2.9.1.2 *Sampling Still Waters (lakes, reservoirs, ponds, marshes)*

- Since still waters have a greater tendency to stratify than rivers or streams, it is important to collect a vertical sample near the bottom of the body of water without disturbing the sediment.
- If the body of water is so large that the sampling locations cannot be reached from the bank, it may be necessary to use a small boat to reach the sampling area.
- If using a bailer or bottle, the sampler should be slowly lowered to the desired depth while minimizing disturbance of the water column, the sample collected, and the sampler slowly raised to the surface. Sampling should be repeated until enough water is collected for the sample bottles.
- If using a peristaltic pump, the pump sample tubing (attached to a weighted line) should be lowered to the desired sampling depth. The pump should be turned on, and about three sample tubing volumes should be pumped to rinse and condition the pump, tubing, and other sample collection or processing equipment. The rinse should be discarded.
- Following the manufacturer instructions for the multiparameter meter and the chemistry kits, the following measurements should be taken on the first sample collected: temperature, pH, conductivity, DO, TDS, ORP, CO₂, alkalinity (CaCO₃), and Cl. Measurements should be recorded on the field data sheet.
- Flow should be direct sampled into collection container(s) until sufficient sample volume has been collected to fill sample bottles.
- Sample containers should be filled and samples filtered and/or preserved. Date and time of sampling should be recorded on the field data sheets.
- Samples should be labeled with the name of person sampling, sample description, date, and time. A chain-of-custody form should be completed.
- Any unusual conditions or deviations from the sampling procedure should be documented on the field data sheet.

2.9.1.3 *Ground Water Sampling*

Purging the well removes standing and/or stagnant water from the well casing. The purpose of purging is to reduce chemical and biochemical artifacts caused by the materials used for well installation and well construction and by reactions occurring within an open borehole or annular space between a well casing and borehole wall. The rule of thumb is to remove a minimum of three well casing volumes while monitoring field parameters until they stabilize before actual samples can be collected. The well diameter, water level, well bottom depth, and purge volume should be recorded on the field data sheet. At a minimum, three well volumes should be purged while monitoring the temperature, pH, and conductivity until the readings have stabilized. If the readings have stabilized after three well volume purges and meet the criteria in Table D-9, sample collection can proceed. If readings are not stable after three volumes, purge should continue until they are stable, but ten purge volumes should not be exceeded before collecting samples. Those instances when readings are not stable prior to sample collection should be documented. The following stability criteria for the measurements are the allowable variation among five or more field measurements.

Table D-9. Field Measurement Stability Criteria

Field Measurement	Stability Criteria
pH	± 0.1 standards units
Temperature, °C	± 0.5°C
Conductivity, mS/cm	± 5%

2.9.2 *Equipment and Calibration*

For groundwater sampling, field equipment will be maintained, serviced, and calibrated according to the manufacturers' recommendations. Spare parts that may be needed during sampling will be included in supplies on hand during field sampling. For all laboratory equipment, testing, inspection, maintenance, and calibration will be the responsibility of the analytical laboratory according to method-specific protocols and the laboratory's QA program.

2.9.3 *Personnel and Training*

Water testing will be performed by personnel of a certified laboratory following the specific methods approved by EPA or other standard. The operator might audit the procedures and results of the selected laboratory with a third party to improve QC.

2.9.4 *Analytical Method*

Where possible, methods are based on standard protocols from EPA or Standard Methods for the Examination of Water and Wastewater. Laboratories shall have standard operating procedures for the analytical methods performed (Table D-10).

Table D-10. Analytic Method and Parameters that May Be Used During Testing

Parameter	Analytical Method
Major Cations: Al, Ba, Ca, Fe, K, Mg, Mn, Na, Si, Zn, Sr	ICP–AES, EPA Method 200.7 or similar
Trace Metals: Sb, As, Cd, Cr, Cu, Pb, Se, Tl	ICP–MS, EPA Method 200.8 or similar
Cyanide (CN ⁻)	EPA 335.4, colorimetry
Mercury	EPA 245.1, CVAA
Anions: Cl ⁻ , Br ⁻ , F ⁻ , SO ₄ ²⁻ , PO ₄ ³⁻ , NO ₃ ⁻	Ion chromatography, EPA Method 300.1, 4110B or similar
Total and Bicarbonate Alkalinity (as CaCO ₃ ²⁻)	Titration, Standard Methods 2320B
Hardness—Total, as CaCO ₃ , mg/L	Automated colorimetric, EPA 130.1
Gravimetric TDS	Gravimetric method Standard Methods 2540C
Water Density	ASTM International D5057 or equivalent
Total Inorganic Carbon (TIC)	SW846 9060A or equivalent
Dissolved Inorganic Carbon (DIC)	SW846 9060A or equivalent
Total Organic Carbon (TOC)	SW846 9060A or equivalent
Dissolved Organic Carbon (DOC)	SW846 9060A or equivalent
Volatile Organic Analysis (VOA)	SW846 8260B or equivalent
Methane	RSK-175 Mod headspace GC/FID or equivalent
Stable Carbon Isotopes ^{13/12} C (¹³ C) of DIC in Water	Gas bench and CF-IRMS for ^{13/12} C
Radiocarbon ¹⁴ C of DIC in Water	AMS for ¹⁴ C
Hydrogen and Oxygen Isotopes ^{2/1} H (δ) and ^{18/16} O (¹⁸ O) of Water	CRDS H ₂ O
Carbon and Hydrogen Isotopes (¹⁴ C, ^{13/12} C, ^{2/1} H) of Dissolved Methane in Water	Offline prep and dual inlet IRMS for ¹³ C; AMS for ¹⁴ C
Compositional Analysis of Dissolved Gas in Water (including N ₂ , CO ₂ , O ₂ , Ar, H ₂ , He, CH ₄ , C ₂ H ₆ , C ₃ H ₈ , iC ₄ H ₁₀ , nC ₄ H ₁₀ , iC ₅ H ₁₂ , nC ₅ H ₁₂ , and C ₆₊)	GC, modified ASTM 1945D
pH	pH electrode, EPA 150.2, D1293
Temperature	2550B
Conductivity	2510B
Specific Conductance	EPA 120.1

ICP–AES = inductively coupled plasma atomic emission spectrometry; ICP–MS = inductively coupled plasma mass spectrometry; LCS = laboratory control sample; GC/MS = gas chromatography–mass spectrometry; GC/FID = gas chromatography with flame ionization detector; AMS = accelerator mass spectrometry; CRDS = cavity ring down spectrometry; IRMS = isotope ratio mass spectrometry; CVAA: cold-vapor atomic absorption; CF–IRMS: continuous flow isotope ratio mass spectrometry.

2.9.5 Quality Control

QC of the sampling and results will follow the protocols established in the analytical method for testing. The Tundra SGS operator reserves the right to audit the lab procedures and protocols to validate the methods are being followed and the results are accurate.

2.10 CO₂ Flowline Monitoring with Fiber Optics

2.10.1 Equipment and Calibration

Fiber optic cables are installed on the flowline for continuous conditioning monitoring. This method is accurate, continuous, and can detect leaks, movement of the flowline due to seismic activities, ground erosion, etc. The main characteristics are as follows:

- Distributed acoustic sensing (DAS): Various DAS technologies are used in the market; the most common is based on coherent optical time domain reflectometry (C-OTDR). C-OTDR utilizes Rayleigh back-scattering, allowing acoustic frequency signals to be detected over long distances. The interrogator sends a coherent laser pulse along an optical fiber (sensor cable). Scattering sites within the fiber causes the fiber to act as a distributed interferometer with a gauge length like the pulse length. Acoustic disturbance on a fiber generates microscopic elongation or compression of the fiber (microstrain), which causes a change in the phase relation and/or amplitude. Before the next laser pulse can be transmitted, the previous pulse must have had time to travel the full length of the fiber and for its reflections to return. Hence, the maximum pulse rate is determined by the length of the fiber. Therefore, acoustic signals can be measured that vary at frequencies up to the Nyquist frequency, which is typically half of the pulse rate. As higher frequencies are attenuated very quickly, most of the relevant ones to detect and classify events are in the lower of the 2-kHz range.
- Distributed temperature sensing (DTS): DTS uses fiber optic sensor cables, typically over lengths of several kilometers, that function as linear temperature sensors. The result is a continuous temperature profile along the entire length of the sensor cable. DTS utilizes the Raman effect to measure temperature. An optical laser pulse sent through the fiber results in some scattered light reflecting to the transmitting end, where the information is analyzed. The intensity of the Raman scattering is a measure of the temperature along the fiber. The anti-Stokes Raman signal changes its amplitude significantly with changing temperature; the Stokes Raman signal is relatively stable. The *position* of the temperature reading is determined by measuring the arrival timing of the returning light pulse similar to a radar echo.
- Distributed strain sensing (DSS): DSS detects change in strain along the flowline due to shifting soil, erosion, frost, and seismic activities.

2.10.2 Resolution and Accuracy

Multiple strands of optical fibers in a sheath are installed to take care of the monitoring requirements listed above. A single standard-range temperature sensor can measure up to 9 mi (15 km) of fiber with 3-ft (1-m) resolution, update data in just a few seconds, and resolve temperatures to 0.018°F (0.01°C). The DAS/strain sensor can measure 25 mi in intervals of 6.5 ft to give multiple data alongside the pipe.

Table D-11. Technical Specifications for DTS Sensor

Parameter	
Number of Channels	12 SE or 6 DE
Total Fiber Length (SE)	9 mi
Spatial Resolution	3 or 6 ft
Sample Spacing	15. or 3 ft
Temperature Repeatability	±1.8°F in 12 s
Operating Temperature	32° to 104°F
Non-Operating Temperature	-4° to 149°F
Humidity	5% to 85% relative

Table D-12. Technical Specifications for Intelligence Vibration Sensor/Strain

Parameter	
Number of Channels	1 SE
Total Fiber Length (SE)	25 mi
Lost Budget	18.5 dB
Output	Full aperture seismic waveform or vibration logs
Measurement Parameter	Strain
Operating Wavelength	1550 nm
Range	25 mi
Output Spatial Interval	6.6, 16.4 and 32.8 ft
Output Time Interval	0.1, 0.25, 0.5, 1 and 2 ms
Low-Frequency Limit	5 Hz
Operating Temperature	32° to 113°F
Storing Temperature	-4° to 158°F

2.10.3 Quality Control

The fiber optic cable is governed by American National Standards Institute (ANSI)/Insulated Cable Engineers Association (ICEA) S-87-640 and ANSI/ICEA S104-696 standards. The size and construction details of the cable and installation details will be decided during detailed design of the flowline in consultation with the vendor specialized in the engineering and installation of fiber optic cables.

2.11 Continuous Recording of Injection Pressures, Rate, Temperature, and Volume

Injection pressure and temperature will be continuously measured at the surface via real-time pressure/temperature (P/T) instruments installed in the CO₂ flowline near the interface with the wellhead. The pressure will be measured by electronic pressure transmitter, with analog output mounted on the CO₂ line associated with each injection well (example technical specifications shown in Table D-13). The temperature will be measured by an electronic temperature transmitter mounted in the CO₂ line at a location near the pressure transmitter, and both transmitters will be located near the wellhead (Table D-14).

Table D-13. Technical Specifications for Surface Pressure Gauges

Parameter	
Calibrated Working Pressure Range	0 to 3,000 psi
Pressure Accuracy	±0.0065%
Pressure Resolution	0.001 psi
Type of Sensor	4–20-mA output transmitter; static measurement; 4-wire

Table D-14. Technical Specifications for Surface Temperature Gauges

Parameter	
Calibrated Working Temperature Range	0 to 150°F
Temperature Accuracy	±0.0055%
Temperature Resolution	0.01°F
Type of Sensor	4–20-mA output; RTD

RTD = resistance temperature detector.

Continuously recorded injection parameters will be reviewed and interpreted on a regular basis, to evaluate the injection stream parameters against permit requirements (example technical specifications found in Table D-15). Trend analysis will also help evaluate the performance (e.g., drift) of the instruments, suggesting the need for maintenance or calibration.

Table D-15. Technical Specifications for Multivariable Pressure Transmitter

Parameter	
Mass Flow Rate Accuracy	±0.075%
Differential Pressure	–1000 to 1000 in H ₂ O (–2.5 to 2.5 bar)
Static Pressure Type	Gauge
Static Pressure Range Url	3,626 psi
Temperature Range	–328° to 1562°F
Type of Equipment	Orifice meter with multivariable transmitters and direct process variable outputs for static pressure, differential pressure, and temperature

The flow rate of CO₂ injected into the well field will be measured by flowmeter skids with senior orifice meters (Table D-16). A total of three meters will be supplied. Each well will have a dedicated meter. Piping and valving will be configured to permit the calibration of each flowmeter. The flow transmitters will each be connected to a remote terminal unit (RTU) on the flowmeter skid.

Table D-16. Technical Specifications for Senior Orifice

Senior Orifice	
Sizing	8-in., 16-in. ranges, flow rate by manufacturer
Temperature Range	-50° to 200°F
Tolerance	Based on manufacturer manual

The flowmeters will be connected to the main CO₂ storage site SCADA system for continuous monitoring and control of the CO₂ injection rate into each well. The flow rate into each well will be controlled using a flow control valve located in the CO₂ pipeline associated with each well.

Pressure and temperature gauges will be deployed on tubing above and below the injection packer to monitor in real-time bottomhole conditions. The gauges and cables will be selected to comply with CO₂ service conditions, and the data will be integrated in the SCADA system and the surveillance platform. Table D-17 shows an example of technical specifications for downhole gauges.

Table D-17. Technical Specifications for Downhole Sensors P/T

Parameter	
Pressure of Sensor	Quartz/Inconel® Carriers
Pressure Accuracy	± 0.02%
Pressure Repeatability	≤0.01% of full scale
Temperature Sensor	Quartz/Inconel carriers
Temperature Accuracy	±0.5°C
Temperature Resolution	0.005°C
Operating Temperature Ranges	-20° to 200°C
Sample Rate	1 s
Inconel Cable	Required

2.12 Annular Pressure Testing

Annular pressure testing is used to validate mechanical integrity in the system. Tests will be performed at least once every 5 years in injectors and monitoring wells, when tubing and packer are pulled for workover, or when the monitoring systems indicate a potential mechanical integrity issue.

To start the test, the well is shut in to stabilize the pressures (injectors). The testing equipment is connected to the annular valves, and surface lines are tested to 1500 psi above the testing pressure. The operator must ensure there are no surface leaks from the pumping unit to the wellhead valve. Any air in the system is bled. If needed, the annular is completed with packer fluid and corrosion inhibitor (it should require minimum amount if so). Initial tubing and casing pressure are recorded. The well will be tested to 1000 psi in the annular, and the pressure should not

decrease more than 10% in 30 minutes. Tubing and casing pressure is monitored continuously. Final tubing and casing pressure are recorded and pressure and volume bled.

If the pressure decreases more than 10%, the pressure is bled, the surface connection tested, and the test repeated. If there is an indication of mechanical failure, the operator will prepare a plan to repair the well and discuss it with the director.

Surface gauges should be calibrated according to manufacturer recommendations and should have a pressure range which will allow the test pressure to be near the midrange of the gauge. Additionally, the gauge must be of sufficient accuracy and scale to allow an accurate reading of a 10% change. The test results will be documented and store in the centralized database of the project for reporting and documentation.

2.13 Fall-Off Test in Injector Wells

Pressure fall-off testing will be conducted upon completion of the injection wells to characterize reservoir hydrogeologic properties and aquifer response model characteristics as well as changes in near-well/reservoir conditions that may affect operational CO₂ injection behavior.

Pressure fall-off testing will also be conducted at least once 5 years after injection for AOR review. Specifically, the objective of the periodic pressure fall-off testing is to determine whether any significant changes in the near-wellbore conditions have occurred that may adversely affect well/reservoir performance.

2.13.1 Testing Method

Controlled pressure fall-off tests are conducted by terminating injection for a designed period/duration of time. The pressure fall-off test is then started with shutting in the well by closing the surface wellhead valve(s) and maintaining continuous monitoring of the surface and downhole pressure recovery within the well/test interval system during the fall-off/recovery period. The designed duration of the pressure fall-off recovery test is a function of a number of factors, including the exhibited preoperational injection reservoir test response characteristics, injection well history prior to termination (i.e., injection duration, rate history), and potential pressure interference effects imposed by any surrounding injection wells completed within the same reservoir. Because of the potential impact of injection rate variability on early-time pressure fall-off recovery behavior, its recommended that injection rates and pressures be uniform and held constant prior to initiating a pressure fall-off test.

Upon shutting-in the well, pressure measurements are monitored continuously in real time, both downhole (within or in the proximity to the injection reservoir) and at the surface wellhead location. Temperature measurements taken during the test may assist in data interpretation. Bottomhole reservoir pressure measurements may be less subject to data scatter, and because of the compressible nature of supercritical and liquid CO₂, bottomhole gauges should be the least affected by wellbore effects. Wellhead (surface) pressure measurements may be sufficient if a positive pressure is maintained at the surface throughout the test.

The duration of the shut-in period used in conducting the pressure fall-off test should be extended sufficiently beyond wellbore storage effects and when the pressure recovery is indicative

of infinite-acting radial flow (IARF) conditions. The establishment of IARF conditions is best determined by using pressure derivative diagnostic analysis plots (Boudet and others, 1989; Spane, 1993; Spane and Wurstner, 1993) and is indicated when the log-log pressure derivative/recovery time plot forms a horizontal line. When IARF pressure fall-off conditions are indicated, the pressure response versus log of fall-off/recovery time becomes a straight line on a standard semi-log plot.

EPA (2012) recommends a general rule-of-thumb of extending pressure fall-off tests a factor of three to five beyond the time required to reach radial flow conditions, while Earlougher (1977) suggests extending recovery periods between 1 and 1.5 log cycles beyond when the pressure response starts to deviate from purely wellbore storage response characteristics (i.e., a unit slope, 1:1 on a standard log-log pressure fall-off recovery plot).

For projects like the Tundra SGS Broom Creek Formation that will use more than one injection well completed in the same reservoir, special considerations need to be taken to execute the pressure fall-off testing to minimize the pressure response impacts from neighboring injection wells in the well recovery response. For the neighboring injection wells (i.e., those not being tested), EPA (2012) recommends that injection at these wells either be terminated prior to initiating the pressure fall-off test for a duration exceeding the planned shut-in period or injection rates at the neighboring wells be held constant and continuously recorded prior to and during the fall-off recovery test. Following the fall-off test, owners or operators are encouraged to send at least two pulses to the test well by way of rate changes in the offset well. These pulses will demonstrate communication between the wells, and if maintained for sufficient duration, they can be analyzed as an interference test to obtain interwell reservoir parameters.

No specialized sample/data-handling procedures are required. Electronic sensor data (e.g., pressure data) will be recorded on data loggers. All electronic data and field records will be transferred and stored on secure servers at the conclusion of each test.

2.13.2 Analytical Methods

Quantitative analysis of the pressure fall-off test response recorded following termination of injection for the test well provides the basis for assessing near well and larger-scale reservoir behavior. Comparison of diagnostic pressure fall-off plots established prior to the operational injection of CO₂ and periodic fall-off tests conducted during the operational injection phases can be used to determine whether significant changes in well or injection reservoir conditions have occurred. Diagnostic derivative plot analysis (Boudet and others, 1989; Spane, 1993; Spane and Wurstner, 1993) of the pressure fall-off recovery response is particularly useful for assessing potential changes in well and reservoir behavior.

The plotting of downhole temperature concurrent with the observed fall-off test pressure is also useful diagnostically for assessing any observed anomalous pressure fall-off recovery response. Commercially available pressure gauges typically are self-compensating for environmental temperature effects within the probe sensor (i.e., within the pressure sensor housing). However, if temperature anomalies are not accounted for correctly (e.g., well/reservoir temperatures responding differently than registered within the probe sensor), erroneous fall-off pressure response results may be derived. As previously discussed, concurrent plotting of

downhole temperature and pressure fall-off responses is commonly useful for assessing when temperature anomalies may be affecting pressure fall-off/recovery behavior. In addition, diagnostic pressure fall-off plots should be evaluated relative to the sensitivity of the pressure gauges used to confirm adequate gauge resolution (i.e., excessive instrument noise).

Standard diagnostic log-log and semi-log plots of observed pressure change and/or pressure derivative plots versus recovery time are commonly used as the primary means for analyzing pressure fall-off tests. In addition to determining specific well performance conditions (e.g., well skin) and aquifer hydraulic property and boundary conditions, the presence of prevailing flow regimes can be identified (e.g., wellbore storage, linear, radial, spherical, double-porosity, etc.) based on characteristic diagnostic fall-off pressure derivative patterns. A more extensive list of diagnostic derivative plots for various formation and boundary conditions is presented by Horne (1990) and Renard and others (2009).

Early pressure fall-off recovery response corresponds to flow conditions within and in the proximity of the wellbore, while later fall-off recovery response is reflective of progressively more distant reservoir conditions from the injection well location. Significant divergence in pressure fall-off response patterns from previous pressure fall-off tests (e.g., accelerated pressure fall-off recovery rates) may be indicative of a change in well and/or reservoir conditions (e.g., reservoir leakage). A more detailed discussion of using diagnostic plot analysis of pressure fall-off tests for discerning possible changes to well and reservoir conditions is presented by EPA (2002).

Quantitative analysis of the pressure fall-off test data can be used to determine formation hydraulic property characteristics (e.g., permeability, transmissivity) and well skin factor (additional pressure change effects due to altering the permeability/storativity conditions of the reservoir/well injection interval boundary). Determination of well skin is a standard result for pressure fall-off test analysis and described in the standard well test analysis texts such as that by Earlougher (1977). Software programs are also commercially available for analyzing pressure fall-off tests. Significant changes in well and reservoir property characteristics (as determined from pressure fall-off analysis), compared to those used in site computational modeling and AOR delineation, may signify a reevaluation of the AOR.

2.13.3 Instrument/Equipment Calibration and Frequency

All field equipment will be visually inspected and tested prior to use. Spare instruments, batteries, etc., will be stored in the field support trailer.

Pressure gauges that are used to conduct fall-off tests will be calibrated in accordance with manufacturer recommendations. In lieu of removing the injection tubing to regularly recalibrate the downhole pressure gauges, their accuracy might be demonstrated by comparison to a second pressure gauge, with current certified calibration, that will be lowered into the well to the same depth as the permanent downhole gauge. Calibration curves, based on annual calibration checks (using the second calibrated pressure gauge) developed for the downhole gauge, can be used for the purpose of the fall-off test. If used, these calibration curves (showing all historic pressure deviations) will accompany the fall-off test data.

2.14 CO₂ Leak Detector

An infrared gas detector will be installed closed to the wellheads of the injector wells and the monitoring well. This sensor will be the interface with the surveillance system to set alarms and provide information on potential leaks at the surface. An example of sensor technical specifications is described in the following data sheet as a reference only (Figure D-3). Final selection of the technology will consider the integration of all the sensors and transducers in a unique surveillance system. Calibration and maintenance protocols will be based on manufacturer specifications and will be performed by specialized professionals. Table D-18 shows referential technical specifications for the CO₂ leak detector.

2.15 DTS Fiber Optic Array Downhole

DTS for downhole application follows the same physical principle discussed for flowline monitoring in the previous sections. The fiber optic is run alongside the casing as an umbilical, and it is protected with clamps and a centralizer to avoid any damage while deploying in the well. The fiber is connected on surface to an interrogator to convert the signal to temperature values, and data are transmitted to the monitoring platform in real time to perform surveillance.

The maintenance and calibration of the equipment will be performed in accordance with manufacturer manuals and will be the responsibility of the provider of the technology. Tables D-19 and D-20 show referential technical specification for DTS systems and fiber optic cable.

2.16 Time-Lapsed 3D Seismic Survey

3D surface seismic is a proven deep reflection technique utilizing seismic sources and receivers to produce full volumetric images of subsurface structure including reservoir and overburden. Under favorable circumstances, 3D surface seismic can offer spatial resolution down to a few meters or less. It offers an effective means of imaging compressible fluids (i.e., CO₂) in the subsurface. A key application of surface seismic methods for monitoring purposes is the time-lapse 3D (4D) seismic method, in which a number of repeat surveys are acquired, enabling changes in fluid distribution to be mapped through time. This has been used successfully in the oil industry to image fluid changes in hydrocarbon reservoirs for a number of years. The technique produces reflections that correspond to P-wave acoustic impedance boundaries in the subsurface. These are commonly associated with boundaries between different rock units, so reflectivity is an effective proxy for subsurface structure. Because of its physical properties, CO₂ in the free (gaseous or fluid) state is highly compressible, which enhances reflectivity over a range of underground storage situations and is particularly well-suited to seismic imaging methods.

2.16.1 Equipment and Calibration

Seismic acquisition and processing are performed by highly specialized companies and crews that provide the equipment, procedures, and QC protocols based on the technology selected for acquisition and parameters for processing the data. As such, these parameters are verified by the client with a parameter sheet, as shown in Figure D-4.

S5000 Gas Monitor
Specifications



Product Specifications		Environmental Specifications	
COMBUSTIBLE GAS SENSOR TYPE	Catalytic bead (Passive comb., XCell comb.) Infrared (IR400)	OPERATING TEMPERATURE RANGE	Transmitter CO (retarded, Zircon) CO (premixed, Silv) MOS (retarded, Zircon) MOS (premixed, Silv) IB (CSi) IB (ATEX/IECEx) XCell (Comb) XCell (Toxic G ₂)
TOXIC GAS & OXYGEN SENSOR TYPE	XCell Toxic: Ammonia (NH ₃), Carbon Monoxide (CO), Carbon Monoxide (CO) H ₂ -resistant, Chlorine (Cl ₂), Sulfur Dioxide (SO ₂) Passive MOS, Echom, XCell Toxic: Hydrogen Sulfide (H ₂ S) XCell O ₂ : Oxygen (O ₂) Infrared: Carbon Dioxide (CO ₂) Electrochem: Ammonia (NH ₃), Hydrogen (H ₂), Hydrogen Chloride (HCl), Hydrogen Cyanide (HCN), Nitric Oxide (NO), Nitrogen Dioxide (NO ₂)	STORAGE TEMPERATURE RANGE	Nonstoring, IR400, IR700, passive sensors XCell sensors
SENSOR MEASURING RANGES	Combustible: 0-100% LEL (CO, IB) O ₂ : 0-5, 0-10, 0-20 ppm CO: 0-100, 0-500, 0-1000 ppm CO, H ₂ -resistant: 0-100 ppm CO ₂ : 0-2000, 0-5000, 0-10000, 0-30000, 0-50000 ppm H ₂ : 0-1000 ppm HCl: 0-50 ppm HCN: 0-50 ppm H ₂ S: 0-10, 0-20, 0-50, 0-100, 0-500 ppm NH ₃ : 0-100 ppm, 0-1000 ppm NO: 0-100 ppm NO ₂ : 0-10 ppm O ₂ : 0-25% SO ₂ : 0-25, 0-100 ppm	RELATIVE HUMIDITY (NON-CONDENSING)	XCell sensors, IR400, IR700: 10-95% Passive combustible: 0-95% Passive H ₂ S: 15-95%
APPROVALS CLASSIFICATION	See manual for complete CSA listings	MECHANICAL SPECIFICATIONS	
WORKING ZONES	Class I, Div/Zone 1 & 2, Groups A, B, C & D/ST/4; Class II, Div/Zone 1 & 2, Groups E, F & G, T6; Class III Type 4X, IP66	INPUT POWER	24 VDC nominal, 12 to 30 VDC
US ZONES	Class I, Zone 1 AEx db IIC T5 Gb Class I, Zone 2 AEx nA nC IIC T4 Gc Zone 21 AEx db IIC T5 C Db	SIGNAL OUTPUT	Dual 4-20 mA current source or sink, HART, Modbus, Bluetooth, Optisol v4's Bluetooth
CANADIAN ZONES / ATEX / IECEx	Ex db IIC T5 Gb Ex nA nC IIC T4 Gc Ex db IIC T5 C Db	RELAY RATINGS	5 A @ 24VDC; 5A @220 VAC (30) SPDT - fail-safe, alarm
CE MARKING DIRECTIVES	Complies with EMC, RED, ATEX	RELAY MODES	Common, discrete, lora
WARRANTY	S5000 transmitter: 2 years XCell Sensors: 3 years Passive comb., MOS, IR400, IR700: 2 years Echom Sensors: Varies by gas	NORMAL MAX POWER	Without Relays: Passive comb., 5.0 W; IR400/IR700, 7.9 W; XCell comb., 5.0 W; XCell toxic & O ₂ , 2.6 W; IR400/IR700 + XCell comb., 10.8 W; IR400/IR700 + XCell toxic or O ₂ , 8.6 W; Dual XCell toxic or O ₂ , 3.3 W; Dual XCell comb., 7.4 W; XCell comb. + XCell toxic or O ₂ , 5.7 W With Relays: Passive comb., 6.0 W; IR400/IR700, 8.9 W; XCell comb., 6.0 W; XCell toxic & O ₂ , 3.6 W; IR400/IR700 + XCell comb., 11.8 W; IR400/IR700 + XCell toxic or O ₂ , 9.6 W; Dual XCell toxic or O ₂ , 4.3 W; Dual XCell comb., 8.4 W; XCell comb. + XCell toxic or O ₂ , 6.7 W
APPROVALS	CSA, FM [®] , ATEX, IECEx, MIMETRO, ABS, DNV-GL Marine, CE Marking, Complies with C2 & 2 No. 152, FM 6320, ANSUSAFCSA/IEC/EN 60079-29-1, ANSV ISA 12.13.01. Suitable for SIL 2.	STATUS INDICATORS	4-digit scrolling LED icons depicting fault, warn, alarm, Bluetooth, 1 and 2 to indicate sensor reading displayed
HOUSING (W x H x D)	6.37" x 5.38" x 4.25" (162 x 137 x 108 mm) WIRELESS SENSOR: 6.37" x 7.62" x 4.25" (162 x 193 x 108 mm) DIGITAL SENSOR: 6.37" x 10.4" x 4.25" (162 x 265 x 108 mm) WIRELESS SENSOR: 14.8" x 6.0" x 4.25" (375 x 152 x 108 mm)	RS-485 OUTPUT	Modbus RTU, suitable for linking up to 128 units or up to 247 units with repeaters
WEIGHT	8 lbs (3.6 kg), 316 SS	BAUD RATE	2400, 4800, 9600, 19200, 38400, 115200
		HART	HART 7, Device Description (DD) and Device Type Manager (DTM) available
		FAULTS MONITORED	Low supply voltage, RAM checksum error, flash checksum error, EEPROM error, internal circuit error, relay, invalid sensor configuration, sensor faults, calibration faults, analog output mismatch fault
		CABLE REQUIREMENTS	3-wire shielded cable for single sensor and 4-wire shielded cable for dual sensor configurations. Accommodates up to 12 AWG or 4 mm ² . Refer to manual for increasing dist. codes.
			[®] See manual for IECEx-approved sensors Specifications subject to change without notice.

1446-21-00/00.0021

MSAsafety.com/detection

Figure D-3. Example data sheet of sensor technical specifications.

Table D-18. Technical Specifications for CO₂ Leak Detector

Type of Sensor	Infrared
Measurement Ranges	
Combustible	0–100% lower explosive limit (LEL)
CO ₂	0–2,000, 0–5,000, 0–10,000, 0–30,000 ppm
Resolution	1% LEL
Response Time	T50 < 4 s, T90 < 9 s
Approval Classification	Class I, Div/Zone 1&2, Groups A,B,C,D T5/T4
Operating Ranges	–40° to 50°C
Relative Humidity	10%–95%

Table D-19. Technical Specification for DTS

Parameter	
Spatial Resolution	1 m (3.2 ft) across entire measurement range
Sampling Resolution	Down to 0.5 m (1.6 ft) across entire measurement range
Temperature Resolution	0.1°C (0.18°F)
Accuracy	±0.5°C (± 0.9°F)
Measurement Range	Up to 12 km
Measurement Temperature Range	–250° to 400°C
Measurement Times	10 s to 24 h
Dynamic Range	30 dB
Operating Environment	–10° to 60°C, humidity 0–95% noncondensing

Table D-20. Technical Specifications for Fiber Optic Cable

Parameter	
Tensile Strength	2,372 lb
Yield Strength	2,018 lb
Strain @ Yield	0.31%
Hydrostatic Pressure	23,872 psi
Burts Pressure	28,050 psi
Working Pressure	20,526 psi
Static Bend Radius	3.2 in.



ZLand Gen2 Transcriber Parameter Sheet

Project Name:	Carbonsafe Phase III 2D/3D	Test Line: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Project Co-ordinate system:	NAD 1927 StatePlane North Dakota South FIPS 3302	
Transcriber Script Projection:		
Acquisition Schedule:	<input checked="" type="checkbox"/> Continuous	<input type="checkbox"/> Scheduled: Start: Finish:
Acquisition Parameters:	Sample Rate	<input type="checkbox"/> 0.5ms <input type="checkbox"/> 1ms <input checked="" type="checkbox"/> 2ms <input type="checkbox"/> 4ms
	Pre-Amp Gain	<input type="checkbox"/> 0dB <input type="checkbox"/> 6dB <input type="checkbox"/> 12dB <input type="checkbox"/> 18dB <input type="checkbox"/> 24dB <input type="checkbox"/> 30dB <input checked="" type="checkbox"/> 36dB
	Anti-Alias Filter	<input checked="" type="checkbox"/> Linear <input type="checkbox"/> Minimum
<i>*Note no low cut filter is not recommended by Fairfield Nodal.</i>	Low Cut Filter	<input checked="" type="checkbox"/> 1-60Hz (1Hz) <input type="checkbox"/> None (Not recommended)
Pre-Start Instrument Tests:	<input type="checkbox"/> All gains and sample rates <input checked="" type="checkbox"/> Production Parameters Only	
Source Type:	<input checked="" type="checkbox"/> Vibroseis <input type="checkbox"/> Dynamite <input type="checkbox"/> OnSeis © <input type="checkbox"/> Other:Passive	
	Vibroseis Sweep Length:	3 x 20 seconds
Record Length:	5 seconds total	
Wireline Regularity: N/A	<input type="checkbox"/> Weekly <input type="checkbox"/> Monthly <input type="checkbox"/> Other (Post Startup wirelines can be requested after project completion)	
Aux Channels Required:	<input checked="" type="checkbox"/> Timebreak <input type="checkbox"/> Pilot <input type="checkbox"/> Spare Pilot	
<i>*Note: 2 Pilots is SAE Standard for Vib</i>	<input checked="" type="checkbox"/> Others: TBD, reference marks, uphole	
Sensor to be used:	<input checked="" type="checkbox"/> Internal 10hz DTCC SOLO <input type="checkbox"/> External: SM24 6x1	
Deliverable Data:	<input checked="" type="checkbox"/> Shot Gather RAW <input checked="" type="checkbox"/> Shot Gather Correlated <input type="checkbox"/> Stacked	
<i>*Note: Correlation will be done with 3rd party software.</i>	<input type="checkbox"/> Receiver Gather (Combed)	
	<input checked="" type="checkbox"/> Continuous Receiver Gather (Record length: <input checked="" type="checkbox"/> 30 Sec <input type="checkbox"/> 60Sec)	
Supporting Documents:	<input checked="" type="checkbox"/> Data Output Logs <input checked="" type="checkbox"/> Deployment File <input checked="" type="checkbox"/> Receiver File	<input type="checkbox"/> Other:
Data Delivery Address:	One copy: Earth Signal Processing Ltd., Attn: Brendan Smith, 1600, 715 – 5th Avenue SW Calgary, Alberta, Canada T2P 2X6 One copy: Minnkota Power Cooperative, Attn: Dan Laudal, 5301 32 nd Ave. S., Grand Forks, ND 58201	

Figure D-4. Example parameter sheet.

2.17 Geophone Array for Seismicity

Based on the information provided by the U.S. Geological Survey (USGS), the North Dakota area does not show high seismic activity that could endanger the containment of the CO₂ in the storage complex or nearby infrastructure. Seismicity history was discussed in Section 2.0 of the permit.

Change of in situ stresses on existing faults caused by human activities (e.g., mining, dam impoundment, geothermal reservoir stimulation, wastewater injection, hydraulic fracturing, and CO₂ sequestration) may induce earthquakes on critically stressed fault segments. To monitor potential induced seismicity due to the injection of CO₂ in the area. The project will plan to continuously monitor seismicity magnitudes and hypocenter locations through sufficiently supplementing existing available stations. The existing 3D seismic and velocity data in the AOR provide additional confidence for locating the hypocenter of measurable seismicity. Other sources of impulsive seismic noise (i.e., large commercial vehicles, mine blasts, etc.), recorded with the proposed seismometer array, can be easily discriminated from potential seismicity related to injection operations.

2.17.1 Personnel and Equipment

The design and installation of the seismometer station array is performed by specialized contractors including the following activities:

- Project management support to design seismometer array, model network performance, coordinate permitting and equipment installation, testing and maintenance, and ensuring optimum execution of project.
- Field operation to deploy surface seismic station instrumentation, power and communication systems, data quality, and commissioning.
- Data acquisition, system configuration, and processing setup.
- Continuous support and monitoring for data verification and QA/QC.
- Continuous near-real-time reporting, including analyst review and alert notifications for events at or above predetermined magnitude thresholds over the seismic area.

The equipment proposed for seismic station includes the following:

- Broadband sensors
- Data logger
- Solar power system and back-up battery
- Communication system
- Cabling
- Mounting equipment

Figure D-5 shows technical specifications for the broadband seismometer as a reference. Figure D-6 shows an example of setup for data acquisition, transfer, storage, and analysis.

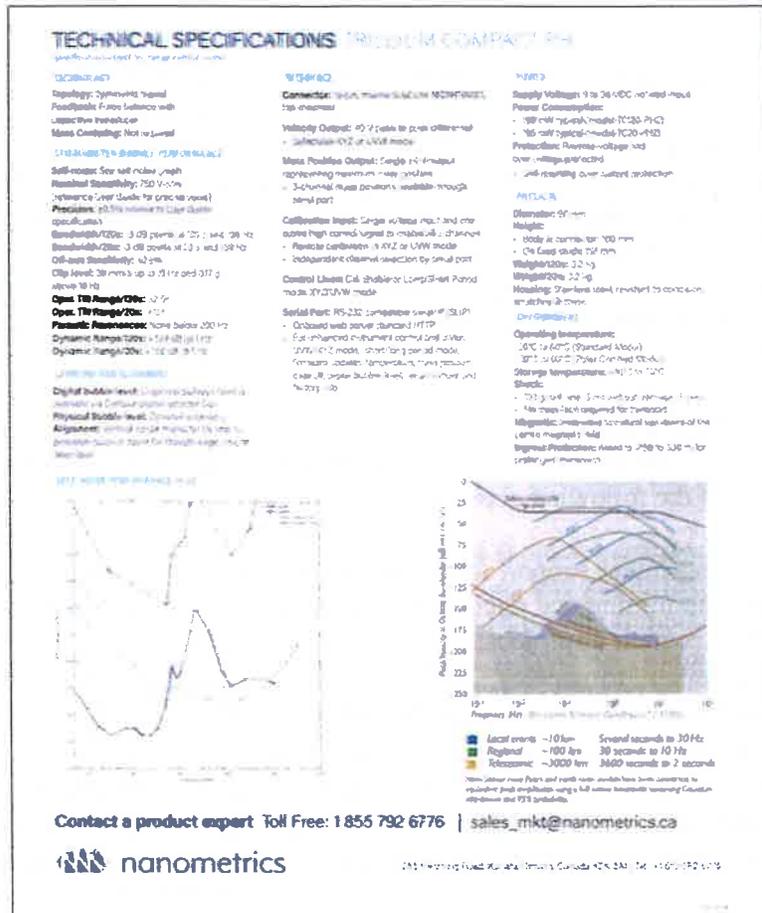


Figure D-5. Reference technical specifications for broadband seismometer.

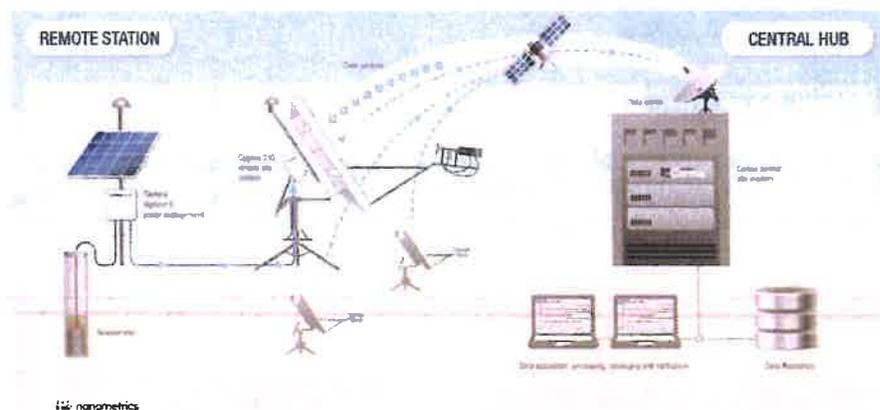


Figure D-6. Example setup for data acquisition, transfer, storage, and analysis.

2.17.2 Traffic Light System

While the historical seismicity of the project area indicates few earthquakes in the area, the operator intends to maintain a surface array for the duration of the project to ensure the safe operation of both the storage facility and adjacent infrastructure in the area. This seismic monitoring will be conducted with a surface array deployed to ensure detection of events above ML 2.0, with epicentral locations within 5 km of the injection well.

If an event is recorded by either the local private array or the public national array to have occurred within 5 km of the injection well, the operator would implement its response plan subject to detected earthquake magnitude limits defined below so as to eliminate or reduce the magnitude and/or frequency of seismic events.

- For events above ML 2.0 within 5 km of the injection well, the operator will closely monitor seismic activity and may implement a pause to operations or continue operations at a reduced rate, should analysis indicate a causal relationship between injection operations and detected seismicity.
- For events above ML 4.0 within 5 km of the injection well, the operator will stop injection and perform an inspection in surface facilities and wells. If there is no damage, the operator will reduce the injection rate by not less than 50% and perform a detailed analysis to determine if a causal relationship exists. Should a causal relationship be determined, a revised injection plan would be developed to reduce or eliminate operationally related seismicity. Such plans are dependent on the pressures and seismicity observed and may include, but not be limited to:
 - Pausing operations until reservoir pressures fall below a critical limit.
 - Continuing operations at a reduced rate and/or below a revised maximum operation pressure.

If the event is not related to the storage facility operation, the operator will resume normal injection rates.

- For events above ML 4.5 within 5 km of the injection well, the operator will stop injection. The operator will inform the regulator of seismic activity and inform them that operations have stopped pending a technical analysis. The operator will initiate an inspection of surface infrastructure for damage from the earthquake. A detailed analysis is conducted to determine if a causal relationship exists between injection operations and observed seismic activity. Should a causal relationship be determined, a revised injection plan would be developed to reduce or eliminate operationally related seismicity before resuming injection operations. Such plans are dependent on the pressures and seismicity observed and may include, but not be limited to:
 - Pausing operations until reservoir pressures fall below a critical limit.
 - Continuing operations at a reduced rate and/or below a revised maximum operation pressure.

If the event is not related to the storage facility operation, and previously approved by the regulators, the operator will resume normal injection rates in steps, increasing the surveillance.

2.18 InSAR Method for Surface Deformation

Geodetic methods, like interferometric synthetic aperture radar (InSAR) (Vasco and others, 2020), can detect small-scale surface deformation and has been shown to approximately map pressure distribution associated with subsurface fluid injection (Reed and others, 2018). InSAR is widely available and allows for multiple nonunique interpretations requiring integration with other monitoring methods (e.g., time-lapse seismic). InSAR requires continuous satellite coverage with consistent surface reflectivity (Klemm and others, 2010). In areas where there is snowfall, agricultural changes, or erosional features, the InSAR results will be uncertain and unreliable for elevation changes. To improve inSAR measurement sensitivity, reflectivity challenges can be mitigated by installing stable reflective monuments.

3. REFERENCES

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APPENDIX D-1

**DATA SHEET FOR FORMATION EVALUATION
TOOLS**

S5000 Gas Monitor

Extreme Durability. Anytime. Anywhere.



General Monitors

Simple retrofits have identical footprint and wiring to S4000 Gas Monitor series.

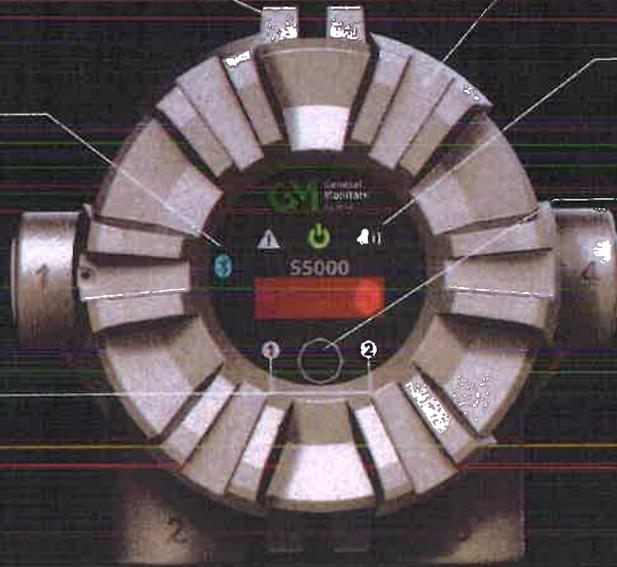
Bluetooth[®] wireless technology allows mobile device to act as HMI screen and controller via the X/S Connect App.

Dual sensor capability increases detection coverage without increasing CAPEX expense. Remote mount gas sensors up to 100 m away.

Wide operating temperature for extreme environments (-55°C to +75°C).

Instrument status indicators illuminate power, fault, and alarm conditions.

Intuitive user experience with industry-first touch-button interface or familiar magnetic interface.



X/S Connect App

Reduce setup time by at least 50% with the X/S Connect App.



Advanced Sensor Technology

POWERED BY

XCell
SENSORS

WITH

TruCal
TECHNOLOGY

- Patented XCell H₂S and CO Sensors with TruCal technology extend calibration cycles for as long as 2 years, actively monitor sensor integrity, and compensate for environmental factors and electrochemical sensor drift.
 - **Diffusion Supervision** sends acoustic signal every 6 hours to check that sensor inlet isn't obstructed so gas can reach the sensor.
 - Worry-free operation; automatically self-checks four times per day.
- Three-year warranty and five-year expected life for XCell Sensors.
- **SafeSwap** enables safe and quick XCell Sensor replacement without powering off gas detector.

Applications

- Compressor stations
- LNG/LPG processing and storage
- Oil well logging
- CNG maintenance facilities
- Petrochemical
- Drilling and production platforms
- Refineries
- Fuel loading facilities



SafeSwap

MSA
The Safety Company

WE KNOW WHAT'S AT STAKE.

S5000 Gas Monitor

Sensor Specifications



Electrochemical Sensors													
Gas	Default Range	Selectable Full Scale Range	Resolution	Response Time*		Repeatability	Zero Drift	Operating Temperature		Sensor Type	Sensor Life	Warranty	Classification
				T50	T90			Min	Max				
Ammonia - 100	0 - 100 ppm	25 - 100 ppm	0.1 ppm	< 20 Sec	< 60 Sec	< +/- 1%	<1% FS / Month	-40 C (-40 F)	60 C (140 F)	XCell	5 Years	3 Years	Div/Zone 2
Ammonia - 1000	0 - 1000 ppm	190 - 1000 ppm	10 ppm	< 20 Sec	< 300 Sec	< +/- 15%	<1% FS / Month	-30 C (-22 F)	50 C (122 F)	Echem	2 Years	1 Year	Div/Zone 2
Carbon Monoxide - 100	0 - 100 ppm	10 - 1000 ppm	1 ppm	< 3 Sec	< 9 Sec	< +/- 1%	<1% FS / Year	40 C (140 F)	60 C (140 F)	XCell	5 Years	3 Years	Div/Zone 1
Carbon Monoxide - 500	0 - 500 ppm	10 - 1000 ppm	1 ppm	< 3 Sec	< 9 Sec	< +/- 1%	<1% FS / Year	40 C (140 F)	60 C (140 F)	XCell	5 Years	3 Years	Div/Zone 1
Carbon Monoxide - 1000	0 - 1000 ppm	10 - 1000 ppm	1 ppm	< 3 Sec	< 9 Sec	< +/- 1%	<1% FS / Year	40 C (140 F)	60 C (140 F)	XCell	5 Years	3 Years	Div/Zone 1
Carbon Monoxide - H2 Resistant	0 - 100 ppm	10 - 1000 ppm	1 ppm	< 3 Sec	< 9 Sec	< +/- 1%	<1% FS / Year	-40 C (-40 F)	60 C (140 F)	XCell	5 Years	3 Years	Div/Zone 1
Chlorine - 5	0 - 5 ppm	1 - 20 ppm	0.1 ppm	< 5 Sec	< 12 Sec	< +/- 1%	<1% FS / Month	-40 C (-40 F)	60 C (140 F)	XCell	5 Years	3 Years	Div/Zone 2
Chlorine - 10	0 - 10 ppm	1 - 20 ppm	0.1 ppm	< 5 Sec	< 12 Sec	< +/- 1%	<1% FS / Month	-40 C (-40 F)	60 C (140 F)	XCell	5 Years	3 Years	Div/Zone 2
Chlorine - 20	0 - 20 ppm	1 - 20 ppm	0.1 ppm	< 5 Sec	< 12 Sec	< +/- 1%	<1% FS / Month	-40 C (-40 F)	60 C (140 F)	XCell	5 Years	3 Years	Div/Zone 2
Hydrogen	0 - 1000 ppm	250 - 1000 ppm	10 ppm	< 40 Sec	< 185 Sec	< +/- 10%	<1% FS / Month	-30 C (-22 F)	50 C (122 F)	Echem	2 Years	1 Year	Div/Zone 1
Hydrogen Chloride	0 - 50 ppm	25 - 50 ppm	1 ppm	< 30 Sec	< 120 Sec	< +/- 35%	<1% FS / Month	-30 C (-22 F)	40 C (104 F)	Echem	2 Years	1 Year	Div/Zone 2
Hydrogen Cyanide	0 - 50 ppm	25 - 50 ppm	1 ppm	< 8 Sec	< 30 Sec	< +/- 15%	<1% FS / Month	-20 C (-4 F)	40 C (104 F)	Echem	2 Years	1 Year	Div/Zone 1
Hydrogen Sulfide - 10	0 - 10 ppm	10 - 100 ppm	0.1 ppm	< 7 Sec	< 23 Sec	< +/- 1%	<1% FS / Year	-40 C (-40 F)	60 C (140 F)	XCell	5 Years	3 Years	Div/Zone 1
Hydrogen Sulfide - 50	0 - 50 ppm	10 - 100 ppm	0.1 ppm	< 7 Sec	< 23 Sec	< +/- 1%	<1% FS / Year	-40 C (-40 F)	60 C (140 F)	XCell	5 Years	3 Years	Div/Zone 1
Hydrogen Sulfide - 100	0 - 100 ppm	10 - 100 ppm	0.1 ppm	< 7 Sec	< 23 Sec	< +/- 1%	<1% FS / Year	-40 C (-40 F)	60 C (140 F)	XCell	5 Years	3 Years	Div/Zone 1
Hydrogen Sulfide - 500	0 - 500 ppm	20 - 500 ppm	1 ppm	< 20 Sec	< 60 Sec	< +/- 10%	<1% FS / Month	-40 C (-40 F)	50 C (122 F)	Echem	2 Years	1 Year	Div/Zone 1
Nitric Oxide	0 - 100 ppm	2.5 - 100 ppm	0.5 ppm	< 5 Sec	< 20 Sec	< +/- 15%	<1% FS / Month	-30 C (-22 F)	50 C (122 F)	Echem	2 Years	1 Year	Div/Zone 1
Nitrogen Dioxide	0 - 10 ppm	1.5 - 10 ppm	0.1 ppm	< 30 Sec	< 60 Sec	< +/- 10%	<1% FS / Month	-40 C (-40 F)	50 C (122 F)	Echem	2 Years	1 Year	Div/Zone 2
Oxygen/Oxygen (FM)	0 - 25%	5 - 25%	0.10%	< 6 Sec	< 11 Sec	< +/- 1% Vol	<0.2 % Vol / Year	-40 C (-40 F)	60 C (140 F)	XCell	5 Years	3 Years	Div/Zone 1
Oxygen (Low)	0 - 25%	2 - 25%	0.10%	< 10 Sec	< 30 Sec	< +/- 10%	<1% FS / Month	-30 C (-22 F)	50 C (122 F)	Echem	2 Years	1 Year	Div/Zone 1
Sulfur Dioxide - 100	0 - 100 ppm	25 - 100 ppm	1 ppm	< 10 Sec	< 30 Sec	< +/- 15%	<1% FS / Month	-30 C (-22 F)	50 C (122 F)	Echem	2 Years	1 Year	Div/Zone 2
Sulfur Dioxide - 25	0 - 25 ppm	5 - 25 ppm	0.1 ppm	< 3 Sec	< 6 Sec	< +/- 1%	<1% FS / Month	-40 C (-40 F)	60 C (140 F)	XCell	5 Years	3 Years	Div/Zone 2

XCell Catalytic Bead Sensors													
Gas	Default Range	Selectable Full Scale Range	Resolution	Response Time*		Repeatability	Zero Drift	Operating Temperature		Sensor Type	Sensor Life	Warranty	Classification
				T50	T90			Min	Max				
Methane (5.0 %)	0 - 100% LEL	20 - 100% LEL	1%	< 10 Sec	< 22 Sec	< +/- 1% LEL	<5% LEL / Year	-55 C (-67 F)	60 C (140 F)	XCell Cat Bead	5 Years	3 Years	Div/Zone 1
Propane (2.1 %)	0 - 100% LEL	20 - 100% LEL	1%	< 10 Sec	< 22 Sec	< +/- 1% LEL	<5% LEL / Year	-55 C (-67 F)	60 C (140 F)	XCell Cat Bead	5 Years	3 Years	Div/Zone 1
Heptane (1.05 %)	0 - 100% LEL	20 - 100% LEL	1%	< 10 Sec	< 22 Sec	< +/- 1% LEL	<5% LEL / Year	-55 C (-67 F)	60 C (140 F)	XCell Cat Bead	5 Years	3 Years	Div/Zone 1
Nonane (0.8 %)	0 - 100% LEL	20 - 100% LEL	1%	< 10 Sec	< 22 Sec	< +/- 1% LEL	<5% LEL / Year	-55 C (-67 F)	60 C (140 F)	XCell Cat Bead	5 Years	3 Years	Div/Zone 1
Hydrogen (4.0 %)	0 - 100% LEL	20 - 100% LEL	1%	< 10 Sec	< 22 Sec	< +/- 1% LEL	<5% LEL / Year	-55 C (-67 F)	60 C (140 F)	XCell Cat Bead	5 Years	3 Years	Div/Zone 1
Methane (4.4 % EN)	0 - 100% LEL	20 - 100% LEL	1%	< 10 Sec	< 22 Sec	< +/- 1% LEL	<5% LEL / Year	-55 C (-67 F)	60 C (140 F)	XCell Cat Bead	5 Years	3 Years	Div/Zone 1
Propane (1.7 % EN)	0 - 100% LEL	20 - 100% LEL	1%	< 10 Sec	< 22 Sec	< +/- 1% LEL	<5% LEL / Year	-55 C (-67 F)	60 C (140 F)	XCell Cat Bead	5 Years	3 Years	Div/Zone 1
Heptane (0.85 % EN)	0 - 100% LEL	20 - 100% LEL	1%	< 10 Sec	< 22 Sec	< +/- 1% LEL	<5% LEL / Year	-55 C (-67 F)	60 C (140 F)	XCell Cat Bead	5 Years	3 Years	Div/Zone 1
Nonane (0.7 % EN)	0 - 100% LEL	20 - 100% LEL	1%	< 10 Sec	< 22 Sec	< +/- 1% LEL	<5% LEL / Year	-55 C (-67 F)	60 C (140 F)	XCell Cat Bead	5 Years	3 Years	Div/Zone 1

*At ambient conditions

S5000 Gas Monitor

Sensor Specifications



Infrared Sensors													
Gas	Default Range	Selectable Full Scale Range	Resolution	Response Time*		Repeatability	Zero Drift	Operating Temperature		Sensor Type	Sensor Life	Warranty	Classification
				T50	T90			Min	Max				
IR400 0-100 % LEL Propane	0 - 100% LEL	N/A	1% LEL	< 1.5 Sec	< 3 Sec	+3% LEL @ <50% LEL; +5% LEL @ >50% LEL	N/A	-40 C (-40 F)	75 C (167 F)	IR400	5+ Years	2 Years	Div/Zone 1
IR400 0-100% LEL Hexane	0 - 100% LEL	N/A	1% LEL	< 1.5 Sec	< 3 Sec	+3% LEL @ <50% LEL; +5% LEL @ >50% LEL	N/A	-40 C (-40 F)	75 C (167 F)	IR400	5+ Years	2 Years	Div/Zone 1
IR400 0-100% LEL Pentane	0 - 100% LEL	N/A	1% LEL	< 1.5 Sec	< 3 Sec	+3% LEL @ <50% LEL; +5% LEL @ >50% LEL	N/A	-40 C (-40 F)	75 C (167 F)	IR400	5+ Years	2 Years	Div/Zone 1
IR400 0-100 % LEL Ethylene	0 - 100% LEL	N/A	1% LEL	< 2 Sec	< 4 Sec	+3% LEL @ <50% LEL; +5% LEL @ >50% LEL	N/A	-40 C (-40 F)	60 C (140 F)	IR400	5+ Years	2 Years	Div/Zone 1
IR400 0-100% LEL Butane	0 - 100% LEL	N/A	1% LEL	< 1.5 Sec	< 3 Sec	+3% LEL @ <50% LEL; +5% LEL @ >50% LEL	N/A	-40 C (-40 F)	75 C (167 F)	IR400	5+ Years	2 Years	Div/Zone 1
IR400 0-100% LEL Ethane	0 - 100% LEL	N/A	1% LEL	< 1.5 Sec	< 3 Sec	+3% LEL @ <50% LEL; +5% LEL @ >50% LEL	N/A	-40 C (-40 F)	75 C (167 F)	IR400	5+ Years	2 Years	Div/Zone 1
IR400 0-100% by Volume Methane	0 - 100% LEL	N/A	1% LEL	< 1.5 Sec	< 3 Sec	+3% LEL @ <50% LEL; +5% LEL @ >50% LEL	N/A	-40 C (-40 F)	75 C (167 F)	IR400	5+ Years	2 Years	Div/Zone 1
IR400 0-100 % LEL Methane EN	0 - 100% LEL	N/A	1% LEL	< 1.5 Sec	< 3 Sec	+3% LEL @ <50% LEL; +5% LEL @ >50% LEL	N/A	-60 C (-76 F)	75 C (167 F)	IR400	5+ Years	2 Years	Div/Zone 1
IR400 0-100 % LEL Propane EN	0 - 100% LEL	N/A	1% LEL	< 1.5 Sec	< 3 Sec	+3% LEL @ <50% LEL; +5% LEL @ >50% LEL	N/A	-60 C (-76 F)	75 C (167 F)	IR400	5+ Years	2 Years	Div/Zone 1
IR400 0-100% LEL Hexane EN	0 - 100% LEL	N/A	1% LEL	< 1.5 Sec	< 3 Sec	+3% LEL @ <50% LEL; +5% LEL @ >50% LEL	N/A	-60 C (-76 F)	75 C (167 F)	IR400	5+ Years	2 Years	Div/Zone 1
IR400 0-100 % LEL Ethylene EN	0 - 100% LEL	N/A	1% LEL	< 2 Sec	< 4 Sec	+3% LEL @ <50% LEL; +5% LEL @ >50% LEL	N/A	-40 C (-40 F)	60 C (140 F)	IR400	5+ Years	2 Years	Div/Zone 1
IR400 0-100% LEL Butane EN	0 - 100% LEL	N/A	1% LEL	< 1.5 Sec	< 3 Sec	+3% LEL @ <50% LEL; +5% LEL @ >50% LEL	N/A	-60 C (-76 F)	75 C (167 F)	IR400	5+ Years	2 Years	Div/Zone 1
IR400 0-100% LEL Ethane EN	0 - 100% LEL	N/A	1% LEL	< 1.5 Sec	< 3 Sec	+3% LEL @ <50% LEL; +5% LEL @ >50% LEL	N/A	-60 C (-76 F)	75 C (167 F)	IR400	5+ Years	2 Years	Div/Zone 1
IR700 0-2000 ppm Carbon Dioxide	0-2000 ppm	N/A	1% LEL	< 4 Sec	< 9 Sec	+5% FS @ <50% FS; +10% FS @ >50% FS	N/A	-40 C (-40 F)	50 C (122 F)	IR700	5+ Years	2 Years	Div/Zone 1
IR700 0-5000 ppm Carbon Dioxide	0-5000 ppm	N/A	1% LEL	< 4 Sec	< 9 Sec	+5% FS @ <50% FS; +10% FS @ >50% FS	N/A	-40 C (-40 F)	50 C (122 F)	IR700	5+ Years	2 Years	Div/Zone 1
IR700 0-10000 ppm Carbon Dioxide	0-10000 ppm	N/A	1% LEL	< 4 Sec	< 9 Sec	+5% FS @ <50% FS; +10% FS @ >50% FS	N/A	-40 C (-40 F)	50 C (122 F)	IR700	5+ Years	2 Years	Div/Zone 1
IR700 0-30000 ppm Carbon Dioxide	0-30000 ppm	N/A	1% LEL	< 4 Sec	< 9 Sec	+5% FS @ <50% FS; +10% FS @ >50% FS	N/A	-40 C (-40 F)	50 C (122 F)	IR700	5+ Years	2 Years	Div/Zone 1
IR700 0-50000 ppm Carbon Dioxide	0-50000 ppm	N/A	1% LEL	< 4 Sec	< 9 Sec	+5% FS @ <50% FS; +10% FS @ >50% FS	N/A	-40 C (-40 F)	50 C (122 F)	IR700	5+ Years	2 Years	Div/Zone 1

Passive Sensors													
Gas	Default Range	Selectable Full Scale Range	Resolution	Response Time*		Repeatability	Zero Drift	Operating Temperature		Sensor Type	Sensor Life	Warranty	Classification
				T50	T90			Min	Max				
10058-1	0 - 100% LEL	N/A	1% LEL	< 10 sec	< 30 sec	+3% LEL @ <50% LEL; +5% LEL @ >50% LEL	<5% FS / Year	-40 C (-40 F)	75 C (167 F)	Cat Bead Screened	3-5 Years	2 Years	Div/Zone 1
11159-8	0-20% LEL	N/A	1% LEL	< 10 sec	< 30 sec	+3% LEL @ <50% LEL; +5% LEL @ >50% LEL	<5% FS / Year	-40 C (-40 F)	70 C (158 F)	Cat Bead Sintered	3-5 Years	2 Years	Div/Zone 1
11159-1	0 - 100% LEL	N/A	1% LEL	< 10 sec	< 30 sec	+3% LEL @ <50% LEL; +5% LEL @ >50% LEL	<5% FS / Year	-40 C (-40 F)	70 C (158 F)	Cat Bead Sintered	3-5 Years	2 Years	Div/Zone 1
50448-9	0-20 ppm	N/A	1 ppm	< 14 sec	n/a	+ 2 ppm or 10% of applied gas	N/A	-40 C (-40 F)	75 C (167 F)	MOS Screened	3-5 Years	2 Years	Div/Zone 1
50448-5	0-50 ppm	N/A	1 ppm	< 14 sec	n/a	+ 2 ppm or 10% of applied gas	N/A	-40 C (-40 F)	75 C (167 F)	MOS Screened	3-5 Years	2 Years	Div/Zone 1
50448-1	0-100 ppm	N/A	1 ppm	< 14 sec	n/a	+ 2 ppm or 10% of applied gas	N/A	-40 C (-40 F)	75 C (167 F)	MOS Screened	3-5 Years	2 Years	Div/Zone 1
51457-9	0-20 ppm	N/A	1 ppm	< 30 sec	n/a	+ 2 ppm or 10% of applied gas	N/A	-40 C (-40 F)	70 C (158 F)	MOS Sintered	3-5 Years	2 Years	Div/Zone 1
51457-5	0-50 ppm	N/A	1 ppm	< 30 sec	n/a	+ 2 ppm or 10% of applied gas	N/A	-40 C (-40 F)	70 C (158 F)	MOS Sintered	3-5 Years	2 Years	Div/Zone 1
51457-1	0-100 ppm	N/A	1 ppm	< 30 sec	n/a	+ 2 ppm or 10% of applied gas	N/A	-40 C (-40 F)	70 C (158 F)	MOS Sintered	3-5 Years	2 Years	Div/Zone 1

* At ambient conditions

S5000 Gas Monitor

Specifications



Product Specifications	
COMBUSTIBLE GAS SENSOR TYPE	Catalytic bead (Passive comb., XCell comb.) Infrared (IR400)
TOXIC GAS & OXYGEN SENSOR TYPE	XCell Toxic Ammonia (NH ₃), Carbon Monoxide (CO), Carbon Monoxide (CO) H ₂ -resistant, Chlorine (Cl ₂), Sulfur Dioxide (SO ₂) Passive MOS, Echem, XCell Toxic Hydrogen Sulfide (H ₂ S) XCell O₂ Oxygen (O ₂) Infrared Carbon Dioxide (CO ₂) Electrochem Ammonia (NH ₃), Hydrogen (H ₂), Hydrogen Chloride (HCl), Hydrogen Cyanide (HCN), Nitric Oxide (NO), Nitrogen Dioxide (NO ₂)
SENSOR MEASURING RANGES	Combustible 0-100% LEL (CB, IR) Cl₂ 0-5, 0-10, 0-20 ppm CO 0-100, 0-500, 0-1000 ppm CO, H₂-resistant 0-100 ppm CO₂ 0-2000, 0-5000, 0-10000, 0-30000, 0-50000 ppm H₂ 0-1000 ppm HCl 0-50 ppm HCN 0-50 ppm H₂S 0-10, 0-20, 0-50, 0-100, 0-500 ppm NH₃ 0-100 ppm, 0-1000 ppm NO 0-100 ppm NO₂ 0-10 ppm O₂ 0-25% SO₂ 0-25, 0-100 ppm
APPROVALS CLASSIFICATION DIVISIONS (US/CAN)	See manual for complete CSA listings. Class I, Div/Zone 1&2, Groups A, B, C & D T5/T4; Class II, Div/Zone 1&2, Groups E, F & G, T6; Class III Type 4X, IP66
US ZONES	Class I, Zone 1 AEx db IIC T5 Gb Class I, Zone 2 AEx nA nC IIC T4 Gc Zone 21 AEx tb IIIC T85°C Db
CANADIAN ZONES/ ATEX/ IECEx	Ex db IIC T5 Gb Ex nA nC IIC T4 Gc Ex tb IIIC T85°C Db
CE MARKING DIRECTIVES	Complies with EMC, RED, ATEX
WARRANTY	S5000 transmitter 2 years XCell Sensors 3 years Passive comb., MOS, IR400, IR700 2 years Echem Sensors Varies by gas
APPROVALS	CSA, FM**, ATEX, IECEx, INMETRO, ABS, DNV-GL Marine, CE Marking. Complies with C22.2 No. 152, FM 6320, ANSI/ISA/CSA/IEC/EN 60079-29-1, ANSI/ ISA 12.13.01. Suitable for SIL 2.
Dimensions	
HOUSING (W x H x D)	6.37" x 5.38" x 4.25" (162 x 137 x 108 mm)
W/PASSIVE SENSOR	6.37" x 7.62" x 4.25" (162 x 193 x 108 mm)
W/DIGITAL SENSOR	6.37" x 10.4" x 4.25" (162 x 265 x 108 mm)
W/IR400 IR SENSOR	14.8" x 6.0" x 4.25" (375 x 152 x 108 mm)
WEIGHT	8 lb. (3.6 kg), 316 SS

Environmental Specifications																																		
OPERATING TEMPERATURE RANGE	Transmitter -55°C to +75°C CB (sintered, Zones) -40°C to +70°C CB (screened, Div) -40°C to +75°C MOS (sintered, Zones) -40°C to +70°C MOS (screened, Div) -40°C to +75°C IR (CSA) -40°C to +75°C IR (ATEX/IECEx) -60°C to +75°C XCell (Comb) -55°C to +60°C XCell (Toxic/O₂) -40°C to +60°C																																	
STORAGE TEMPERATURE RANGE	Housing, IR400, IR700, passive sensors -50°C to +85°C XCell sensors -40°C to +60°C																																	
RELATIVE HUMIDITY (NON-CONDENSING)	XCell sensors, IR400, IR700 10-95% Passive combustible 0-95% Passive H₂S 15-95%																																	
Mechanical Specifications																																		
INPUT POWER	24 VDC nominal, 12 to 30 VDC																																	
SIGNAL OUTPUT	Dual 4-20 mA current source or sink, HART, Modbus, Bluetooth. <i>Optional: w/o Bluetooth</i>																																	
RELAY RATINGS	5A @ 30VDC; 5A @ 220 VAC (3X) SPDT – fault, warn, alarm																																	
RELAY MODES	Common, discrete, horn																																	
NORMAL MAX POWER	<table border="1"> <thead> <tr> <th></th> <th>Without Relays</th> <th>With Relays</th> </tr> </thead> <tbody> <tr> <td>Passive comb.</td> <td>5.0 W</td> <td>6.0 W</td> </tr> <tr> <td>Passive MOS</td> <td>9.8 W</td> <td>10.8 W</td> </tr> <tr> <td>IR400/IR700</td> <td>7.9 W</td> <td>8.9 W</td> </tr> <tr> <td>XCell comb.</td> <td>5.0 W</td> <td>6.0 W</td> </tr> <tr> <td>XCell toxic & O₂</td> <td>2.6 W</td> <td>3.6 W</td> </tr> <tr> <td>IR400/IR700 + XCell comb.</td> <td>10.8 W</td> <td>11.8 W</td> </tr> <tr> <td>IR400/IR700 + XCell toxic or O₂</td> <td>8.6 W</td> <td>9.6 W</td> </tr> <tr> <td>Dual XCell toxic or O₂</td> <td>3.3 W</td> <td>4.3 W</td> </tr> <tr> <td>Dual XCell comb.</td> <td>7.4 W</td> <td>8.4 W</td> </tr> <tr> <td>XCell comb. + XCell toxic or O₂</td> <td>5.7 W</td> <td>6.7 W</td> </tr> </tbody> </table>		Without Relays	With Relays	Passive comb.	5.0 W	6.0 W	Passive MOS	9.8 W	10.8 W	IR400/IR700	7.9 W	8.9 W	XCell comb.	5.0 W	6.0 W	XCell toxic & O ₂	2.6 W	3.6 W	IR400/IR700 + XCell comb.	10.8 W	11.8 W	IR400/IR700 + XCell toxic or O ₂	8.6 W	9.6 W	Dual XCell toxic or O ₂	3.3 W	4.3 W	Dual XCell comb.	7.4 W	8.4 W	XCell comb. + XCell toxic or O ₂	5.7 W	6.7 W
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Dual XCell comb.	7.4 W	8.4 W																																
XCell comb. + XCell toxic or O ₂	5.7 W	6.7 W																																
STATUS INDICATORS	4-digit scrolling LED, icons depicting fault, warn, alarm, Bluetooth, 1 and 2 to indicate sensor reading displayed																																	
RS-485 OUTPUT	Modbus RTU, suitable for linking up to 128 units or up to 247 units with repeaters																																	
BAUD RATE	2400, 4800, 9600, 19200, 38400, 115200																																	
HART	HART 7, Device Description (DD) and Device Type Manager (DTM) available																																	
FAULTS MONITORED	Low supply voltage, RAM checksum error, flash checksum error, EEPROM error, internal circuit error, relay, invalid sensor configuration, sensor faults, calibration faults, analog output mismatch fault																																	
CABLE REQUIREMENTS	3-wire shielded cable for single sensor and 4-wire shielded cable for dual sensor configurations. Accommodates up to 12 AWG or 4 mm ² <i>Refer to manual for mounting distances.</i>																																	

** See manual for FM-approved sensors

Specifications subject to change without notice.

MSA operates in over 40 countries worldwide. To find an MSA office near you, please visit MSAsafety.com/offices.

APPENDIX D-2

SCHLUMBERGER MDT BROCHURE

Schlumberger



MDT Modular Formation Dynamics Tester



Applications

- Formation pressure measurement and fluid contact identification
- Formation fluid sampling
- Permeability measurement
- Permeability anisotropy measurement
- Mini-drillstem test (DST) and productivity assessment
- In-situ stress and microfracturing

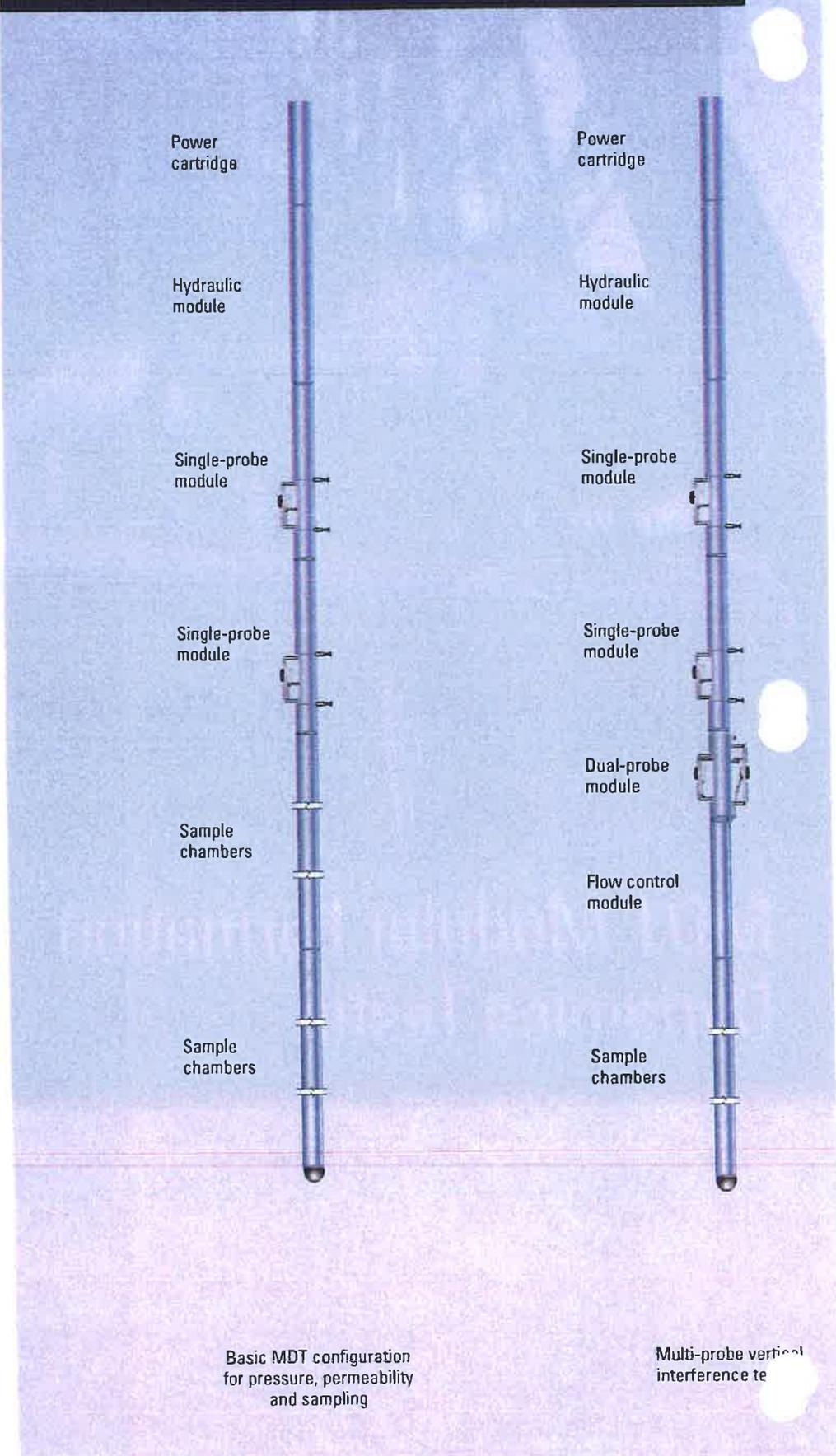
Benefits

- Testing and sampling in low permeability, laminated, fractured, unconsolidated and heterogeneous formations
- Fast, repeatable pressure measurements
- Faster tests in low permeability—reduced seal losses and probe plugging
- Pressure, volume and temperature (PVT) formation fluid samples
- Downhole fluid differentiation
- Real-time fluid gradients, permeability and confinement assessment

Features

- Modular, custom design capability
- Multiple samples in one trip
- Multiprobe and inflatable dual packer module options
- Efficient integration with other tools
- Accurate pressure measurements using a CQG® Crystal Quartz Gauge
- Programmable pretest pressure, rate and volume
- Fibre optic pumpout prior to sampling
- Fluid resistivity and temperature measurement at the probe
- Quantitative sample concentration measurement with optical spectroscopy techniques
- Low shock and single-phase sampling
- Field proven database for accurate pressure time

The MDT tool can be customized and efficiently assembled on-site to meet exact requirements depending on the needs of a particular well evaluation.



Basic MDT configuration for pressure, permeability and sampling

Multi-probe vertical interference test

Power cartridge

Pump-out module

Hydraulic module

Single-probe module

Dual-packer module

Flow control module

Sample chambers

Vertical interference test with probe-packer

Power cartridge

Multisample modules

Sample chambers

Pump-out module

Live fluid analyzer

Hydraulic module

Single-probe module

Low shock PVT-quality sampling

Real-time measurements

The Schlumberger MDT* Modular Formation Dynamics Tester tool provides fast and accurate pressure measurements and high-quality fluid sampling. It can also measure permeability anisotropy. In a single trip, the MDT tool is able to acquire most of the data requirements needed for accurate and timely decision making.

Flexibility

The key to this remarkable tool is an innovative, modular design that lets you customize the tool for the required applications. MDT modules combine to meet the exact needs and goals of the data acquisition program. This designed flexibility makes the tool compatible with almost all Schlumberger measurement technologies and allows the MDT tool to evolve as new measurement techniques, technologies and options evolve.

Quick, accurate pressure and permeability measurements

Reservoir pressure measurements using a wireline tester require inserting the probe into the reservoir and withdrawing a small amount of fluid. Since the pressure gauge is exposed to many temperature and pressure changes, these measurements require accurate gauges with high resolution that can dependably react to the dynamic conditions.

The MDT tool uses highly accurate gauges with best-in-class resolution, repeatability and dynamic response for pressure measurements. These pressure gauges exhibit excellent response with no compromise in accuracy or resolution. Precise flowline control during testing and sampling ensures monophasic flow. These innovative features provide the most efficient and accurate permeability determination available.

MDT modules

Electronic power module

The power cartridge (MRPC) converts AC power from the surface to provide DC power for all modules in the tool. It is an essential part of any MDT configuration.

Hydraulic power module

The hydraulic power module (MRHY) contains an electric motor and hydraulic pump to provide hydraulic power for setting and retracting the single- and dual-probe modules. The MRHY module features an accumulator that allows the test probes to autoretract and prevent a stuck-tool situation in the event of a power failure.

Single-probe module

The single-probe module (MRPS) contains the probe assembly, (with packer and telescoping backup pistons), the pressure gauges, fluid resistivity and temperature sensors, and a 20-cc pretest chamber. The MRPS also contains a strain gauge and an accurate, high-resolution, quick-response CQG gauge. The volume, rate and drawdown of this chamber can be controlled from the surface to adjust to any test situation, especially in tight formations.

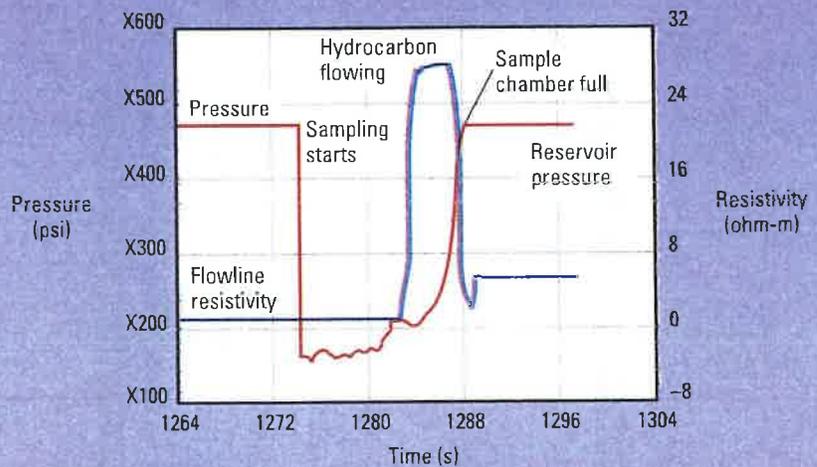
Dual-probe module

The dual-probe module (MRPD) contains two probes mounted back-to-back, 180° apart on the same block. When combined with an MRPS module, it forms a multiprobe system capable of determining horizontal and vertical permeability.

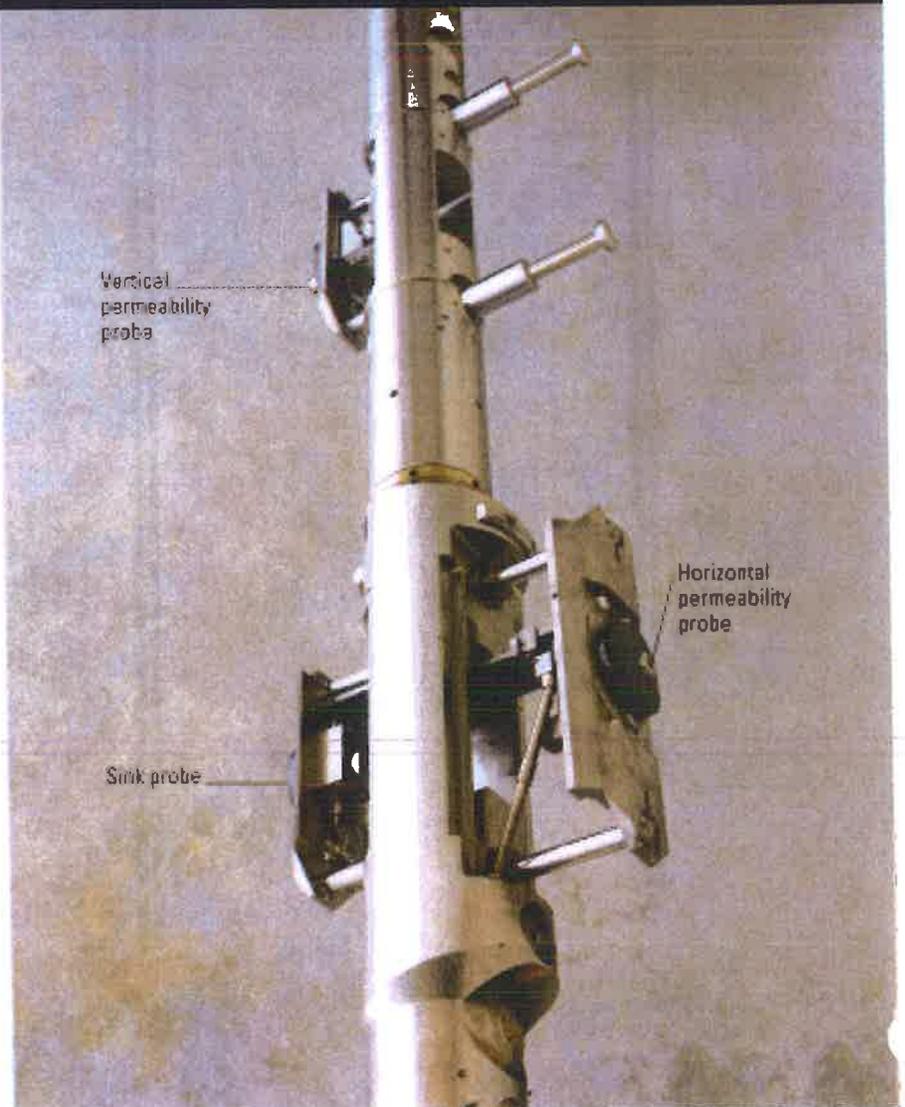
During a typical test with the MRPD module, formation fluid is diverted through the sink probe to a one-liter pretest chamber in the flow control module. The MRPD module, in conjunction with the pressure measured at the vertical probe from the MRPS module, measures the pressure at both probes. These measurements are used to determine near-wellbore permeability anisotropy.

Flexible probe configurations are a unique feature of the MDT tool. By running multiple probe modules, pressure communication between adjacent formations can be monitored during an interference test. The MDT multiprobe configuration also allows in-situ verification of gauge quality and utilization of two different probe assemblies for redundancy in difficult conditions.

In a water-based mud environment, the MDT flowline resistivity measurement helps discriminate between fluid contaminated by mud filtrate and formation oil or fresh water.



The multiprobe configuration of the MDT tool measures the pressure response at two or more locations in addition to the single probe data. Data from the MDT multiprobe configuration provide an evaluation of horizontal and vertical permeabilities and formation heterogeneity.



The MRPA module employs two inflatable packers to isolate a borehole interval for testing. Tests in low permeability formations are greatly enhanced, because the cross-sectional area of the isolated interval is many times greater than that of the standard MDT probe.

Dual-packer module

The dual-packer module (MRPA) uses two inflatable packers, set against the borehole wall, to isolate a 3 to 11 ft. section of the formation and provide access to the formation over a wall area that is thousands of times larger than the standard probe area. This allows fluids to be withdrawn at a higher rate without dropping below the bubble point, and it provides a permeability estimate with a radius of investigation in the range of tens of feet. The MRPA is useful for making pressure measurements and taking fluid samples in difficult conditions (tight, vuggy, fractured and unconsolidated formations) and has also been used in cased holes after a perforation operation. In addition, the MRPA module can be used for in-situ stress testing and mini-frac testing.



Modular sample chamber

The Modular Sample Chamber (MRSC) is available in three sizes: 1 gal, 2.75 gal and 6 gal. The upper block of each chamber contains a throttle valve that can be operated fully open, fully closed or in throttle mode. The 1- and 2.75-gal chambers exist in both H₂S and non-H₂S versions. The 6-gal chamber can be expanded in 6-gal increments to act as dump chambers by adding more 6-gal cylinders.

Multisample module

The Multisample Module (MRMS) allows the collection of high-quality samples for PVT analysis. The module is designed to retrieve six formation fluid samples, 450-cc each, during a single trip into the well. Sample bottles detach easily from the tool for transport to a PVT laboratory. The bottles meet transportation regulations for shipping pressurized vessels, so no wellsite transfer is necessary.

Since multiple MRSC and MRMS modules can be combined, the total number of sample modules is limited only by cable strength and well conditions. For longer tool strings, as well as highly deviated and horizontal wells, the MDT tool can be combined with the TLC* Tough Logging Conditions system for efficient sampling operations.

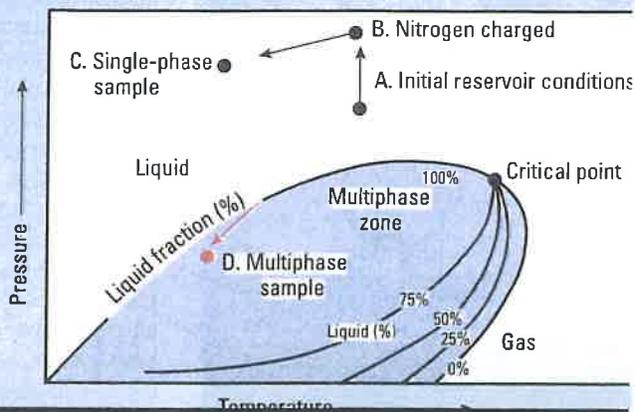
Multiple MRMS modules—each capable of collecting six high-quality PVT samples—can be combined in one run to meet sampling requirements.



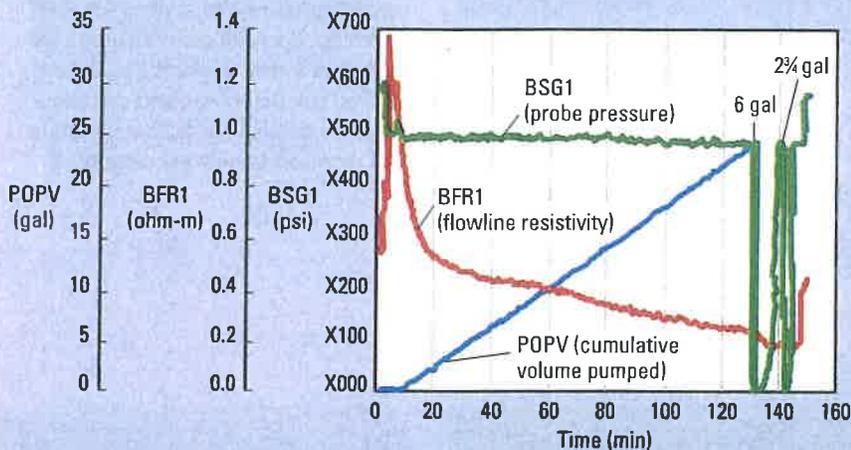
Chemical analysis of MDT-acquired samples helps to characterize the reservoir fluid and facilitates optimal completion and surface facilities design.



As they are brought to the surface, samples taken at reservoir temperature and pressure (A) can change phase at lower temperatures and pressures (D). Overpressuring the sample downhole (B) will maintain its initial phase as it is brought to the surface (C) at a lower temperature.



In oil-based mud environments, flowline resistivity may also aid in formation water sampling.



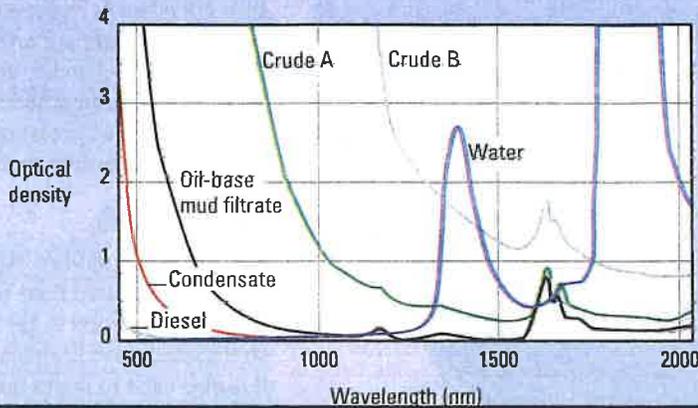
Single-phase multisample chamber

The single-phase multisample chamber ensures collection of monophasic fluid samples by overpressuring samples after they are taken at reservoir conditions. Sample chambers are pressurized with a nitrogen gas chamber across two pistons. This compensates for the temperature-induced pressure drop as the samples are returned to the surface.

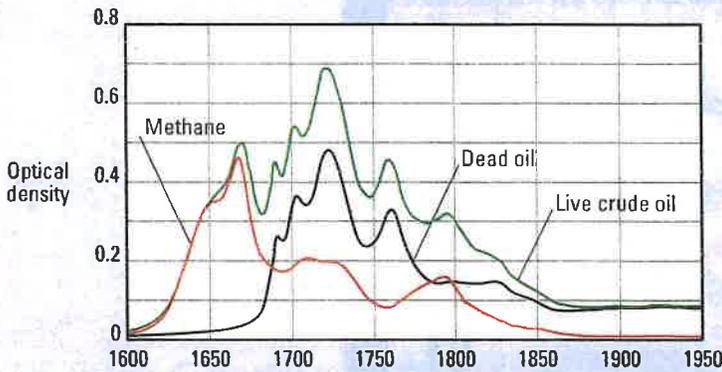
Pump-out module

The Pump-Out Module (MRPO) is used to pump unwanted fluid (mud filtrate) from the formation to the borehole, so representative samples can be taken. It is also used to pump fluid from the borehole into the flowline for inflating the packers of the MRPA module. In addition, the module can pump within the tool, for example, from a sample chamber to the inflatable packers.

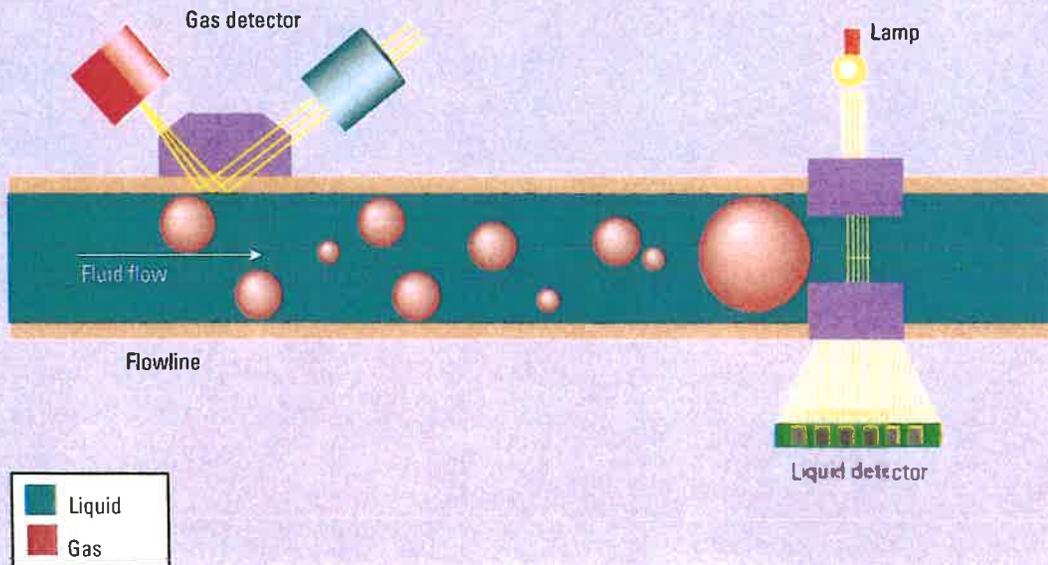
Optical density spectra can be used to uniquely identify different fluids.



The graph below illustrates the optical density (OD) of methane, dead oil and live crude oil. An OD of zero means there is full transmission (no absorption) of light. An OD of 1 means that 10% of the light is transmitted, and 90% is absorbed. Methane and dead oil peaks are prominently shown in the live crude oil spectrum.



The LFA module provides real-time downhole fluid analysis by measuring multiple optical properties of the fluid to quantify the amount of reservoir and drilling fluids in the flowline.



Live fluid analyzer module

Downhole fluid analysis in real time, as provided by the LFA* Live Fluid Analyzer module, enhances the usefulness of new techniques like pumpout and dual inflatable packers. The LFA module measures optical properties of the fluid in the flowline.

The LFA module employs an absorption spectrometer that utilizes visible and near infrared light to quantify the amount of reservoir and drilling fluids in the flowline. Light is transmitted through the fluid as it flows past the LFA spectrometer. The amount of light absorbed by the fluid depends on the composition of the fluid. Water and oil are reliably detected by their unique absorption spectra. A second sensor in the LFA module is the gas refractometer, which can be used to differentiate between gas and liquid.

Optical absorption in the visible and near infrared region is used for fluid discrimination and quantification; the change in index of refraction is used for free gas detection; and methane presence is used for both contamination monitoring and gas detection.

Flow control module

The Flow Control Module (MRCF) is a 1-liter pretest chamber where the flow rate can be accurately measured and controlled. The MRCF can also be used during sampling that requires a controlled flow rate. The volume is limited to 1 liter. The module creates a pressure pulse in the formation large enough for multi-probe measurements.

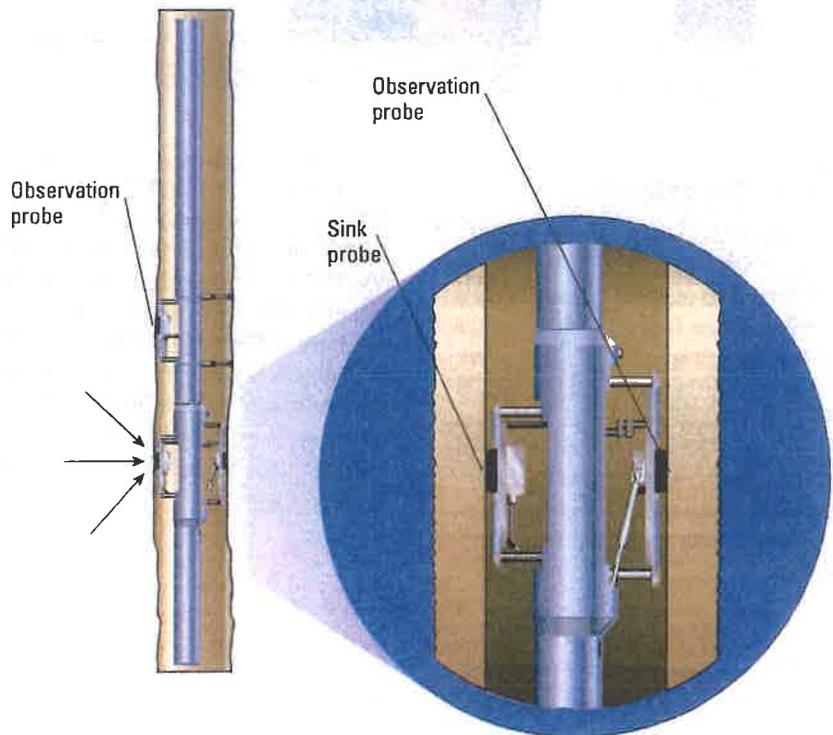
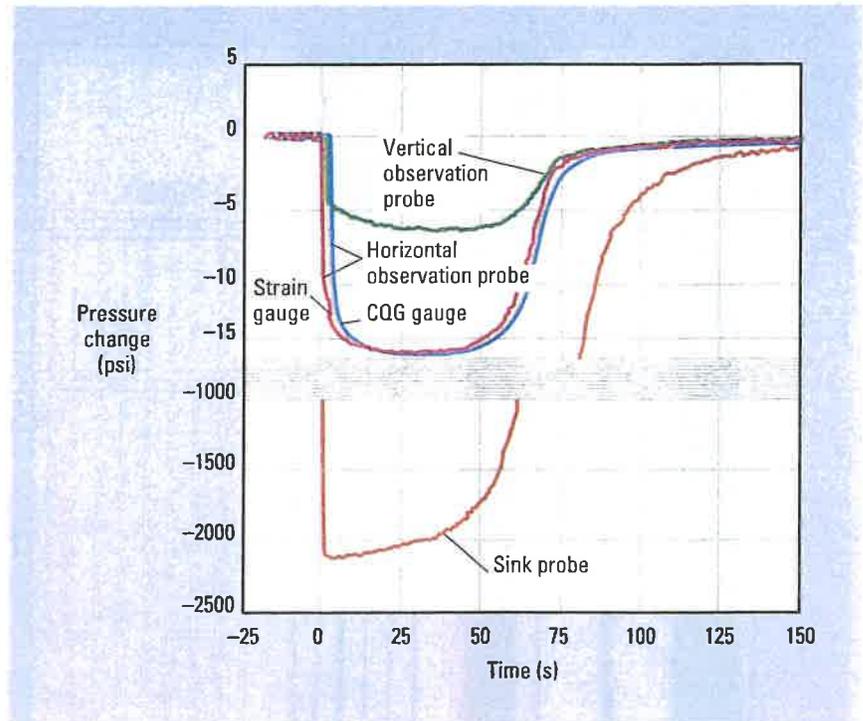
Prejob modeling and real-time answers

The software capabilities of the MDT tool enhance its hardware capabilities. Drawing on experience based on the vast number of MDT projects that have been completed over the past decade, programs are available to accurately plan and execute new MDT jobs. Highly sophisticated interpretation programs generate accurate pressure gradient, permeability and fluid sampling answers when they are needed.

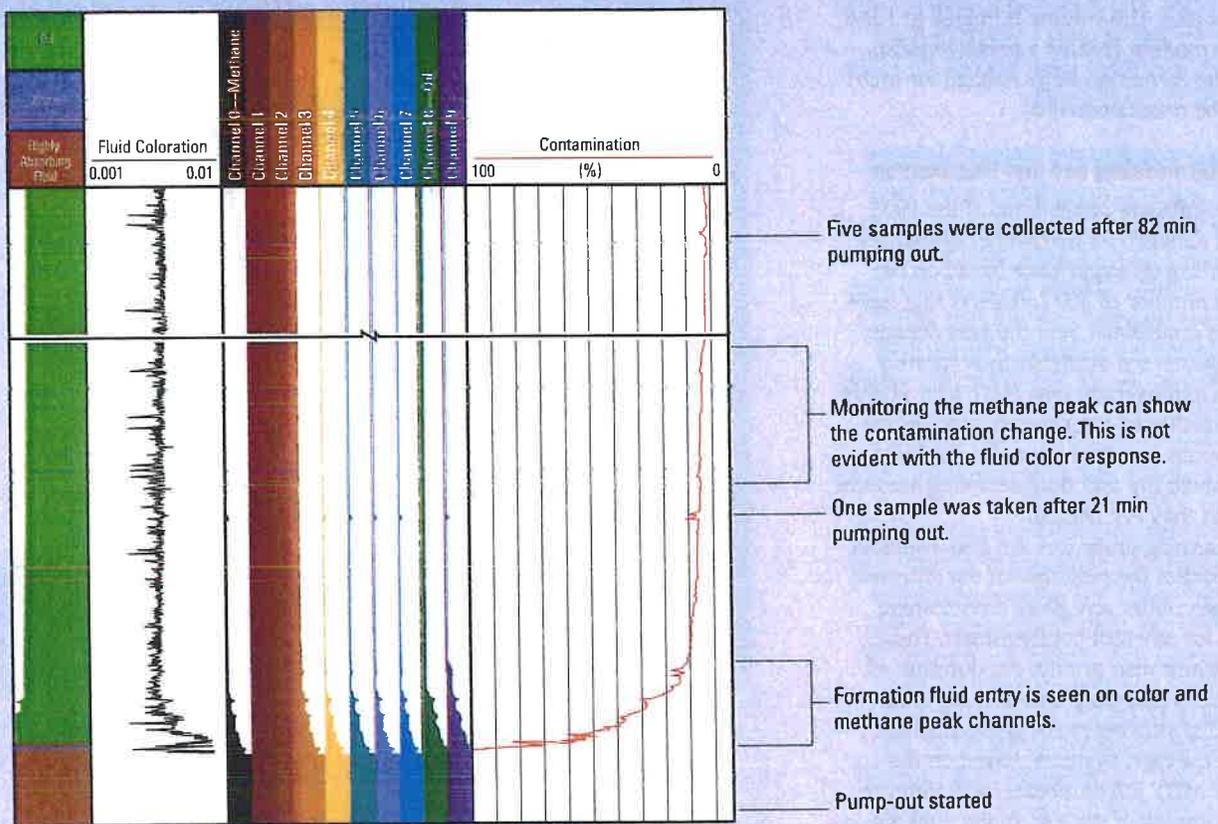
Planning programs are also available to predict the response of the different gauges under any given environment and for any tool configuration. These programs also predict the duration of required pumping time and the likelihood of sticking in any given situation. These expert systems, based on the huge MDT job database, help optimize the running of the job. In the unlikely event that sticking does occur, the LWF* logging while fishing technique can be used to simultaneously complete the survey on drillpipe and safely retrieve the stuck string.

MDT interpretation software provides real-time plotting of pressure, resistivity and optical properties versus time. These plots generate derivatives and perform interpretation at the wellsite. This capability is essential for real-time quality control and ongoing optimization of the job. Using the InterACT* wellsite monitoring and control system for real-time data transfer to remote sites, Schlumberger and customer experts can simultaneously apply more sophisticated and elaborate modeling and interpretation software offsite.

The Flow Control Module contains a one-liter pretest chamber and metering valves capable of producing finely tuned drawdowns.



The LFA module monitors oil-based mud contamination by analyzing fluid color and methane content to ensure quality fluid sampling. Color and methane curves indicate the percentage of fluid contamination.



Fluid identification example

The purpose of fluid sampling is to obtain a representative sample of the virgin reservoir fluid. To obtain the sample, the unwanted fluid must be discarded prior to collecting the formation fluid sample. There also must be a method to analyze and determine the nature of the fluid in real time. The MDT tool with the pump-out module, LFA module and the flowline resistivity measurement identifies and collects high-quality reservoir fluid samples suitable for further laboratory analysis.

Flowline resistivity measurements taken by the probe module help discriminate between formation fluids and filtrate from water- and oil-base muds. Equipping the MDT tool with a pump-out module makes it possible to sample fluid, while monitoring the flowline resistivity, by pumping filtrate-contaminated fluid into the mud column. Fluid removed from the formation is excluded from the sample chamber until an uncontaminated sample can be recovered.

MDT Specifications

Single-probe configuration

OD	4.75 in. [120.6 mm]
Min hole size	5½ in. [149.2 mm] [†]
Max without kits	14.25 in. [361.5 mm]
Max with kits	24 in. [610 mm]
Pressure rating	25,000 psi [17,235 kPa] [‡]
Max temperature rating	400°F [205°C] [§]

Multiprobe tool configuration

OD	6.00 in. [152.4 mm]
Min hole size	7.62 in. [193.6 mm]
Max without kit	13.75 in. [336.5 mm]
Max with kit	15.00 in. [381.00 mm]
Max pressure rating	25,000 psi [17,235 kPa]
Max temperature rating	400°F [205°C]

Dual-packer configuration

OD	5.00 to 10.00 in. [127.0 to 254 mm] ^{††}
Min hole size	5½ in. [149.2 mm] ^{††}
Max hole size	14.75 in. [374.6 mm] ^{††}
Pressure rating	25,000 psi [17,235 kPa]
Max temperature rating	325°F [163°C] ^{††}

LFA module

OD	4.75 in. [120.6 mm]
Length	5.83 ft [1.7 m]
Weight	161 lbm [73 kg]
Range	0 to 5 optical density
Accuracy	0.01 optical density
Pressure rating	25,000 psi [17,236 kPa]
Temperature rating	350°F [176°C]

Pressure gauge specifications

Strain gauge

Range	0 to 25,000 psi [0 to 17,236 kPa] ^{††}
Accuracy	0.10% full scale
Repeatability	0.06% full scale
Resolution	0.1 psi [0.689 kPa]
Temperature rating	400°F [205°C] ^{††}

CQG gauge

Range	0 to 25,000 psi ^{††}
Accuracy	2.0 psi [13.8 kPa]+ 0.01% of reading
Repeatability	< 1.0 psi
Resolution	0.01 psi
Temperature rating	400°F [205°C] ^{††}

[†] If wellbore conditions are favorable, the tool can be run on TLC in holes with an ID as small as 5½ in. [14 cm].

[‡] 25,000 psi [172.5 mPa] for the high pressure MDT and 20,000 psi [138 mPa] for the normal MDT tool

[§] 350°F [175°C] with some CQG types

^{††} Functional rating based on the actual packer installed and type of mud used.

^{†††} Actual pressure/temperature combination will depend on specific type of gauge. For the CQG, HCQG-A is rated 175°C/25,000 psi, HCQG-B/D 200°C/18,000 psi or 180°C/20,000 psi and CQG-C/G 175°C/15,000 psi.

APPENDIX D-3

**SCHLUMBERGER DUAL PACKER MODULE
SPECIFICATIONS GUIDELINES**

Dual-Packer Module

Inflatable packers that seal against the borehole wall to isolate the interval for MDT tester operations

APPLICATIONS

Used with the MDT* modular formation dynamics tester for

- Downhole fluid analysis (DFA)
- Formation fluid sampling
- Formation pressure measurement and fluid gradient estimation
- Determination of pretest drawdown mobility (permeability/viscosity)
- Permeability and anisotropy determination away from the well
- In situ stress determination

High-performance packers

The Dual-Packer Module (MRPA) of the MDT modular formation dynamics tester consists of two inflatable packer elements that seal against the borehole wall to isolate an interval, improving the effectiveness of pressure measurement and fluid sampling in low-permeability, laminated, or fractured formations.

High-performance packers are run with the MRPA to expand the MDT tester's operating envelope, with a temperature rating to 410 degF [210 degC] and compatibility with both water- and oil-base mud systems. The superior elasticity and improved durability of the high-performance packers enable performing more stations per run and lessen packer replacement. The asymmetrical packer design reduces sticking and bulging potential.

Operational reliability is further enhanced by the autoretract mechanism (ARM), which applies a longitudinal tensile force to assist in retracting the packers after deflation, in turn minimizing drag. At temperatures below 225 degF [107 degC], the elements retain enough elasticity for operation without the ARM.

The MDT Pumpout Module (MRPO) is used to inflate the packers with fluid.

Reliability in high-H₂S environments

For operations in H₂S environments, the Dual-Packer Module is available in a NACE-compliant version for sampling up to 50% H₂S in hole sizes from 5½ to 9½ in.

Effective isolation of large areas

The length of the test interval between the packers is 3.2 ft [0.98 m] and can be extended to 5.2, 8.2, or 11.2 ft [1.58, 2.5, or 3.41 m] by using 2- and 3-ft [0.61- and 0.91-m] spacers with large-diameter mandrels. For the 3.2-ft interval, the area of the isolated interval of the borehole is about 3,000 times larger than the area of the borehole wall isolated by the MDT tester's Single-Probe Module (MRPS). For fluid sampling, the large area results in flowing pressures that are only slightly below the reservoir pressure, which avoids phase separation even for pressure-sensitive fluids such as gas condensates or volatile oils. In low-permeability formations, high drawdown usually occurs with the probe, whereas fluid can be withdrawn from the formation using the MRPA with minimum pressure drop through the larger flowing area. In finely laminated formations, the MRPA can be used to straddle permeable streaks that would be difficult to locate with a probe. In fractured formations, the MRPA can usually seal the interval whereas a probe could not.



Dual-Packer Module.

Dual-Packer Module

For pressure transient testing, following a large-volume flow from the formation, the resulting pressure buildup has a radius of investigation of 50 to 80 ft [15 to 24 m]. Depending on the application, an interval pressure transient test (IPTT) provides advantages over a conventional drillstem test (DST). It is environmentally friendly because no fluids flow to the surface, and it is cost effective because many zones can be tested in a short time.

The MRPA can be used to create a micro-hydraulic fracture that can be pressure tested to determine the minimum in situ stress magnitude. The fracture is created by pumping wellbore fluid into the interval between the inflatable packer elements.

Measurement Specifications

	MRPA
Range of measurement	CQG* crystal quartz gauge: 750 to 15,000 psi [5 to 103 MPa] Quartzdyne [®] gauge: 0 to 25,000 psi [0 to 172 MPa] Axton* dynamically compensated single quartz gauge: 0 to 30,000 psi [207 MPa] to 374 degF [190 degC] and 0 to 20,000 psi [138 MPa] to 392 degF [200 degC] [†] Temperature: -67 to 400 degF [-55 to 204 degC]
Resolution	CQG gauge: 0.008 psi [55 Pa] at 1.3-s gate time Quartzdyne gauge: 0.01 psi/s [69 Pa/s] Axton gauge: 0.008-psi [55-Pa] rms at 1-s gate time Temperature: 0.01 degF [0.05 degC]
Accuracy	CQG gauge: ± 2 psi [13,789 Pa] + 0.01% of reading) [†] Quartzdyne gauge: $\pm 0.02\%$ of full scale + 0.01% of reading) Axton gauge: ± 2.0 psi [$\pm 13,689$ Pa] for typical HPHT operational range (>212 degF [>100 degC] and >15,000 psi [>103 MPa]) and ± 6.0 psi [$\pm 41,368$ Pa] for full range [‡] Temperature: ± 1.0 degF [± 0.5 degC]

* Operating range up to 400 degF and default calibration to 392 degF with calibration to higher temperature on request.

† Includes fitting error, hysteresis, repeatability, and allowance for sensor aging; the corresponding percentages of the pressure reading account for the uncertainty of the calibration equipment.

Dual-Packer Module Packers Mechanical Specifications

Packer	Outside Diameter, in [cm]	Hole Size—Min., in	Hole Size—Max., in	Temperature Rating, degF [degC]	Pressure Rating, psi [MPa]	Differentiat Pressure Rating, psi [MPa]	Type	Recommended Number of Settings [†]
SIP-A3-5in	5 [12.70]	5.875	7.5	350 [177]	20,000 [138]	4,500 [31]	Symmetrical	10 settings at 3,000 psi in 6-in hole
SIP-A3A-5in	5 [12.70]	5.875	7.5	350 [177]	20,000 [138]	4,500 [31]	Asymmetrical	10 settings at 3,000 psi in 6-in hole
IPCF-H2S-500	5 [12.70]	5.875	7.5	350 [177]	20,000 [138]	TBQ [‡]	Asymmetrical	TBQ [‡]
SIP-A3-6.75in	7 [17.78]	7.875	9.625	350 [177]	20,000 [138]	3,000 [21]	Symmetrical	10 settings at 3,000 psi in 8.75-in hole
SIP-A3A-6.75in	7 [17.78]	7.875	9.625	350 [177]	20,000 [138]	3,000 [21]	Asymmetrical	10 settings at 3,000 psi in 8.75-in hole
IPCF-PAS-700	7 [17.78]	7.875	9.625	350 [177]	20,000 [138]	3,000 [21]	Symmetrical	10 settings at 3,000 psi in 8.5-in hole
IPCF-PA-700	7 [17.78]	7.875	9.625	350 [177]	20,000 [138]	3,000 [21]	Asymmetrical	10 settings at 3,000 psi in 8.5-in hole
IPCF-PC-700	7 [17.78]	7.875	9.625	350 [177]	20,000 [138]	4,500 [31]	Asymmetrical	5 settings at 4,500 psi in 8.5-in hole
IPCF-BA-700	7 [17.78]	7.875	9.625	410 [210]	20,000 [138]	3,000 [21]	Asymmetrical	3 settings at 3,000 psi in 8.5-in hole
IPCF-H2S-700	7 [17.78]	7.875	9.625	350 [177]	20,000 [138]	3,000 [21]	Asymmetrical	10 settings at 3,000 psi in 8.5-in hole
SIP-A3A-8.5in	8.5 [21.59]	9.875	14	350 [177]	20,000 [138]	3,000 [21]	Asymmetrical	10 settings at 3,000 psi in 12.25-in hole
SIP-A3A-10in	10 [25.40]	11	17.5	350 [177]	20,000 [138]	2,100 [14]	Asymmetrical	7 settings at 2,100 psi in 14.4-in hole

[†] At the specified pressure and hole size
[‡] To be qualified

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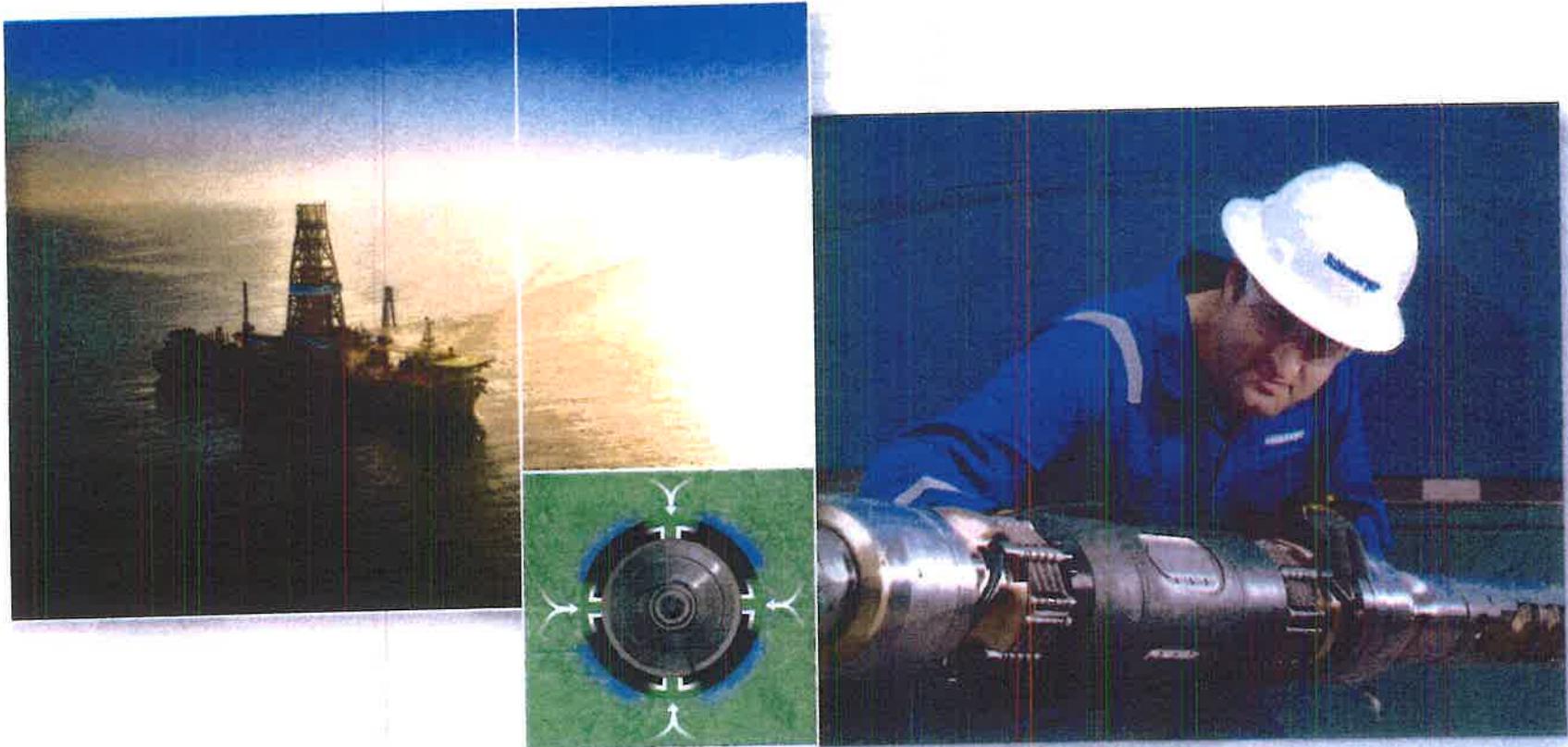
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APPENDIX D-4

SCHLUMBERGER SATURN 3D RADIAL PROBE

Schlumberger



Saturn

3D radial probe

Saturn

Fluid flow and pressure measurement where not previously possible

Applications

- Formation fluid sampling
- Downhole fluid analysis (DFA)
- Formation pressure measurement
- Fluid-gradient determination
- Far-field permeability measurement and anisotropy determination
- Well testing design optimization

Benefits

- Fluid sampling and DFA for
 - Low-permeability formations
 - Heavy oil
 - Fluids with a bubble- or dewpoint near reservoir pressure
 - Unconsolidated formations
 - Rugose boreholes
- Low-permeability formation pressure testing
- Interval pressure transient testing (IPTT) with reduced storage for fast flow-regime identification





Features

- Combinable with all MDT® modular formation dynamics tester modules
- High-temperature rated to 350 degF
- 8,000-psi differential pressure rating between flowline and hydrostatic pressure
- Low storage effect
- No sump, eliminating fluids mixing with stationary mud
- Four field-replaceable, elliptical suction probes
- 79.44-in² total surface flow area
- Individual probe filters to prevent flowline plugging
- Self-sealing drain assembly for excellent seal maintenance during sampling in any quality of borehole



The keys to fluid acquisition and pressure pretests

A revolution in sampling and pressure-testing technology

The self-sealing Saturn* 3D radial probe enables true 3D circumferential flow in the formation around the borehole, significantly reducing the time needed to obtain representative formation fluids and extend fluid sampling and downhole fluid analysis (DFA) to what were previously challenging environments:

- low-permeability formations
- heavy oil
- near-critical fluids
- unconsolidated formations
- rugose boreholes.

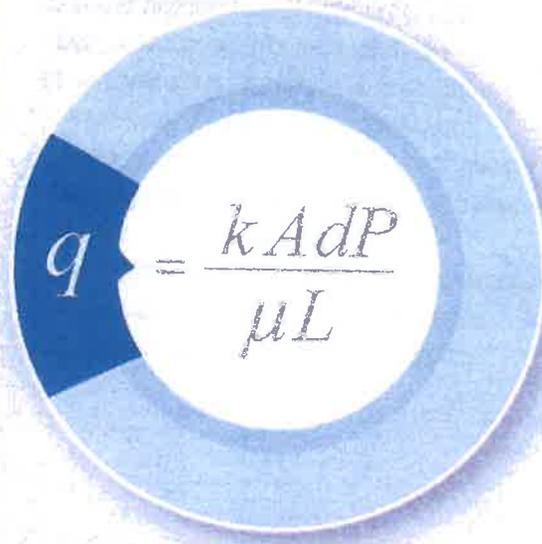
The low storage volume of the Saturn design not only facilitates fluid sampling and DFA but also the efficient performance of complete pressure surveys in extremely low-permeability formations.

Surface area open to flow and pressure drawdown

Successful wireline fluid sampling and DFA begin with accessing a representative sample of the virgin reservoir fluid, ideally in a minimum amount of time. Formation pressure testing similarly requires fluid withdrawal.

The fluid extraction is typically conducted with a probe module that includes a packer, telescoping backup pistons, and a flowline.

The pistons extend the probe and packer assembly against the borehole wall to provide a sealed fluid path from the reservoir to the flowline. The governing principle behind flowing any fluid from a reservoir for formation testing is Darcy's law, in which flow (q) is a function of permeability (k), drawdown pressure (Δp), surface area open to flow (A), fluid viscosity (μ), and the length (L) over which the drawdown is applied.



Flow from the formation to a conventional formation tester is narrowed to the intake of the single probe, not from the entire circumference of the borehole wall.

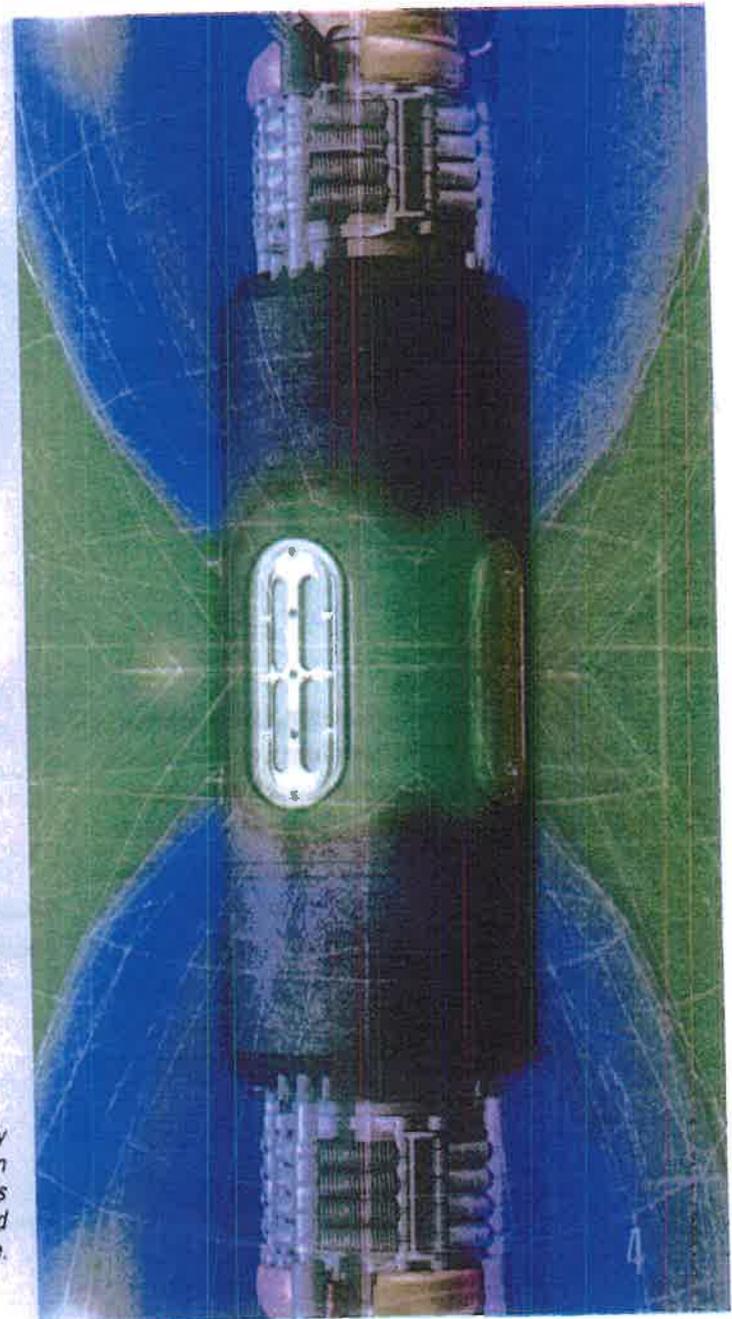
Different probe surface flow areas and the maximum pressure drawdowns that the formation tester can manage are used depending on the formation permeability and fluid viscosity. Typically, the larger the surface area and the higher the maximum drawdown pressure, the higher the flow rate of fluid from the formation that can be achieved for a formation testing operation.

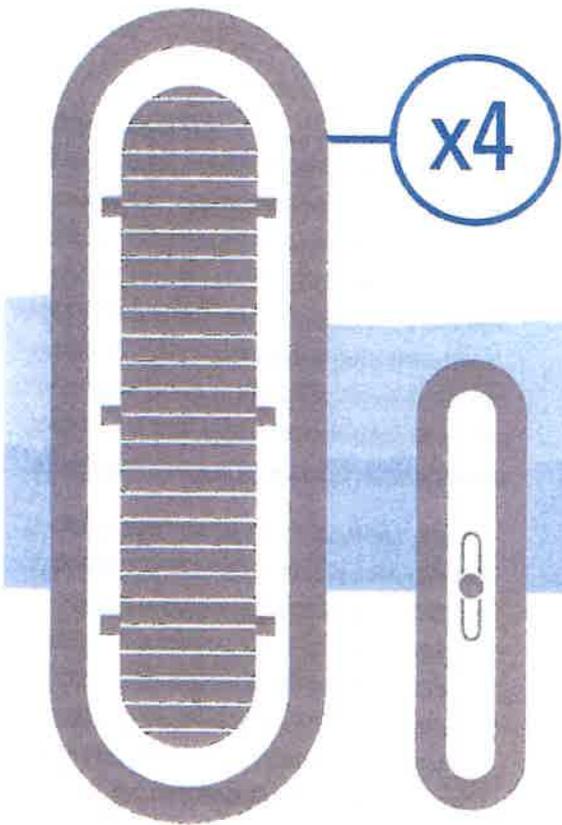
Over the years, Schlumberger innovation has increased the maximum allowable differential pressure from 4,596 psi with the standard pumpout displacement unit to 11,760 psi with the high-pressure displacement unit. Concurrently, the available surface area of the probes has increased by nearly 40 times, from the standard probe's 0.15 in² to the 6.03-in² elliptical probe. This technical progression enables successfully performing

formation testing in a wider range of environments. However, as operators attempt to tap into hydrocarbons previously thought to be unproducible—low-permeability or unconsolidated reservoirs, high-viscosity formation fluids—or where reduced drawdown is necessary to test reservoirs in which the saturation pressure of the fluid is close to the reservoir pressure, formation testing is technologically challenged.

The **Saturn 3D radial probe** meets these challenges with a radical redesign of the fluid-extraction module to deploy multiple self-sealing probes around the borehole. With a total surface flow area of 79.44 in², Saturn technology expands the operating envelope of formation testing for both fluid flow and reservoir environments.

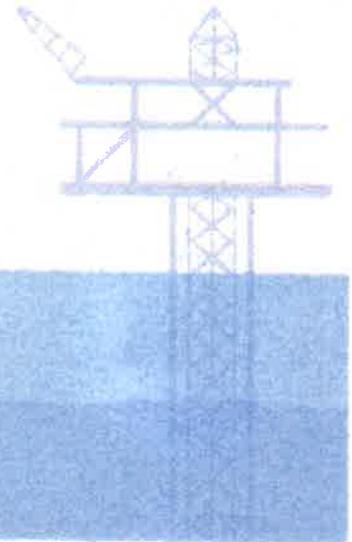
The self-sealing drain assembly incorporating the four Saturn probes circumferentially extracts fluid from the formation instead localizing flow at a single probe.





x4

The Saturn 3D radial probe increases the probe surface area by more than 500 times.



Probes not to scale.

79.44

Surface flow area, in²

Saturn 3D radial probe

6.03

Surface flow area, in²

Elliptical probe

2.01

Surface flow area, in²

Extralarge-diameter probe

1.01

Surface flow area, in²

Quicksilver Probe*

0.85

Surface flow area, in²

Large-diameter probe

0.15

Surface flow area, in²

Standard probe

Flow certainty for understanding your heavy oil and low-permeability reservoir

The 79.44 in² of surface flow area of the Saturn 3D radial probe makes it easy to extract heavy oils for conducting DFA, sampling, and pressure testing. Having brought uncontaminated oil with a relative density as low as 7.5 API to the surface, the Saturn probe significantly expands the operating envelope of sampling and determining mobility for viscous fluids.

Reliably out of the hole, every time

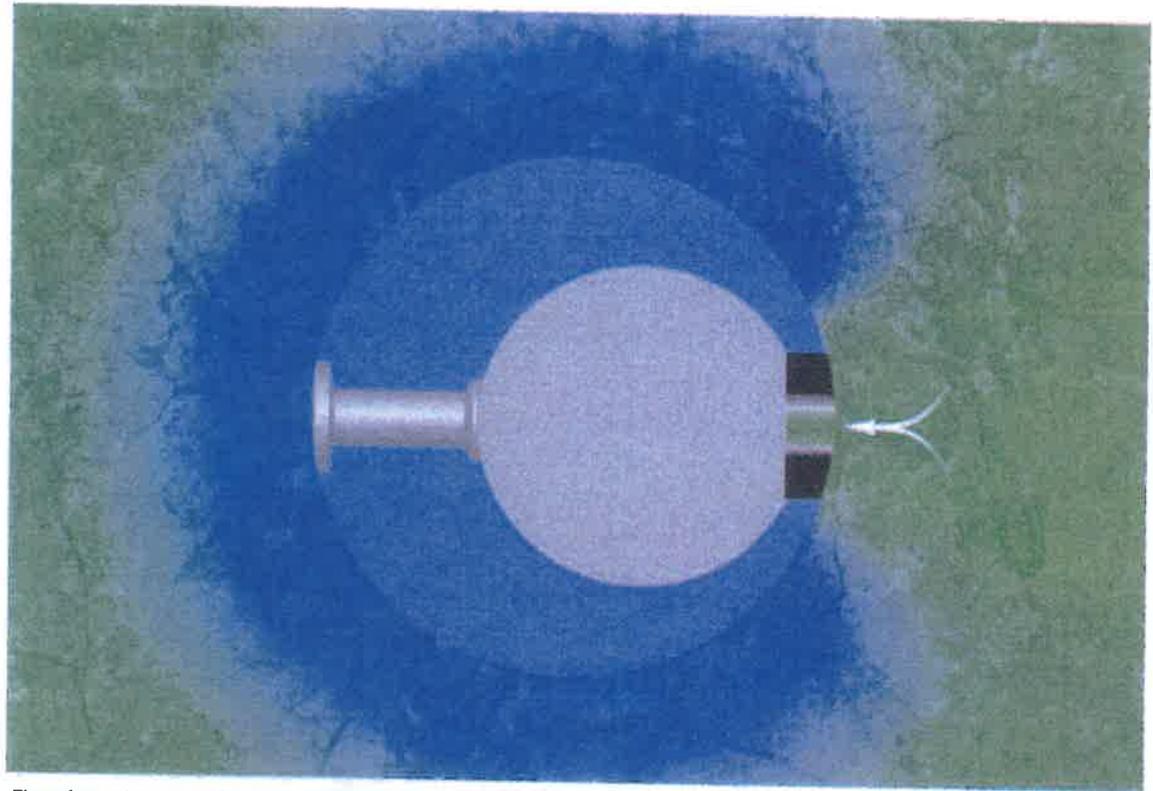
Sixty-four individual heavy-duty springs mounted around the edges of the Saturn assembly and two large-diameter heavy-duty springs around the mandrel ensure reliable, consistent retraction of the elliptical suction probes after every station. The large cumulative closing force of the mechanical spring system keeps operational risk to a bare minimum.



The mechanical retract mechanism of the Saturn 3D radial probe employs heavy-duty springs to secure the probes when not deployed.

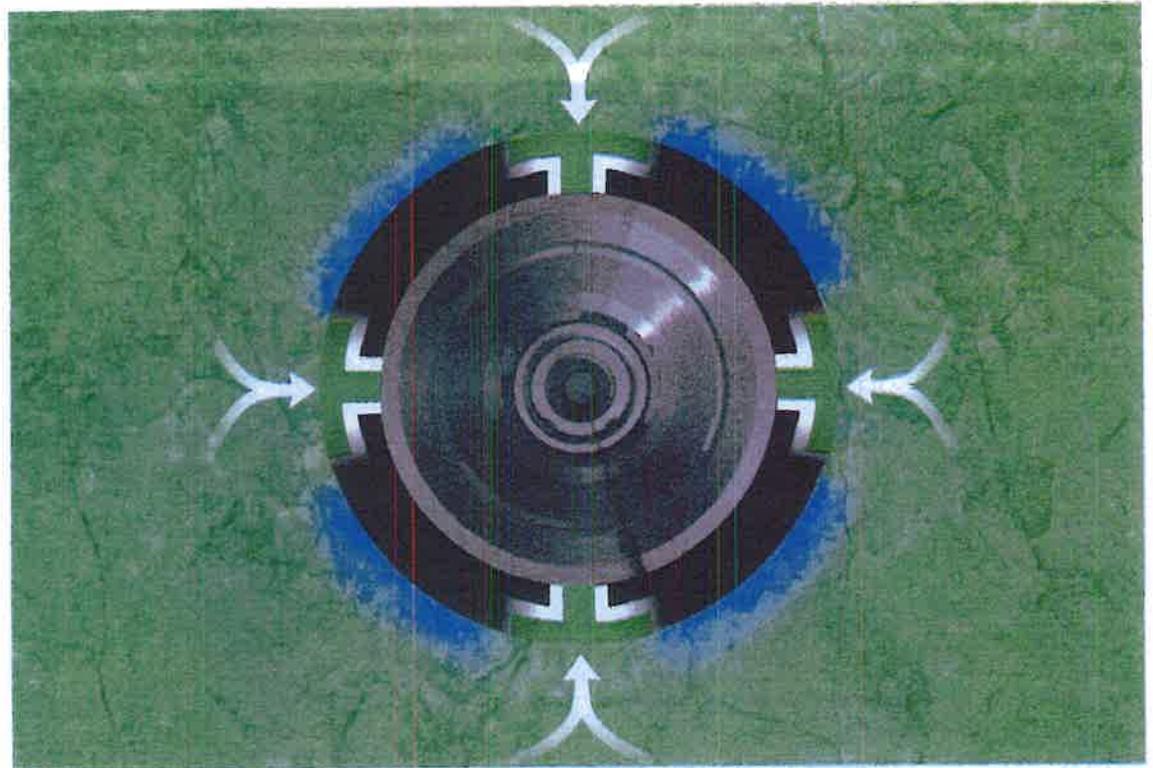
Flow fluid in three dimensions

The Saturn 3D radial probe comprises four elliptical-shaped suction probes, distributed at 90° intervals around the circumference of the tool. This placement pulls fluid circumferentially from around the borehole, instead of the conventional probe arrangement of one port as the sole fluid access point. Each of the four Saturn probes has a surface flow area of 19.86 in², which is more than 2 times larger than the surface area of the largest conventional probe. Together, the four Saturn probes total 79.44 in² of surface flow area, an increase of more than 500 times over the area of the standard conventional probe.



Flow from the formation to a conventional formation tester is narrowed to the intake of the single probe, not from the entire circumference of the borehole wall.

Circumferential flow around the wellbore has significant benefits for both sampling cleanup and interval pressure transient testing (IPTT). The Saturn 3D radial probe quickly removes the filtrate from the entire circumference of the wellbore to draw in uncontaminated formation fluid. In addition, the significantly larger flow area of the 3D radial probe can induce and sustain flow in low-mobility formations, formations in which the matrix is uncemented, and the viscous fluid content of heavy oil reservoirs.



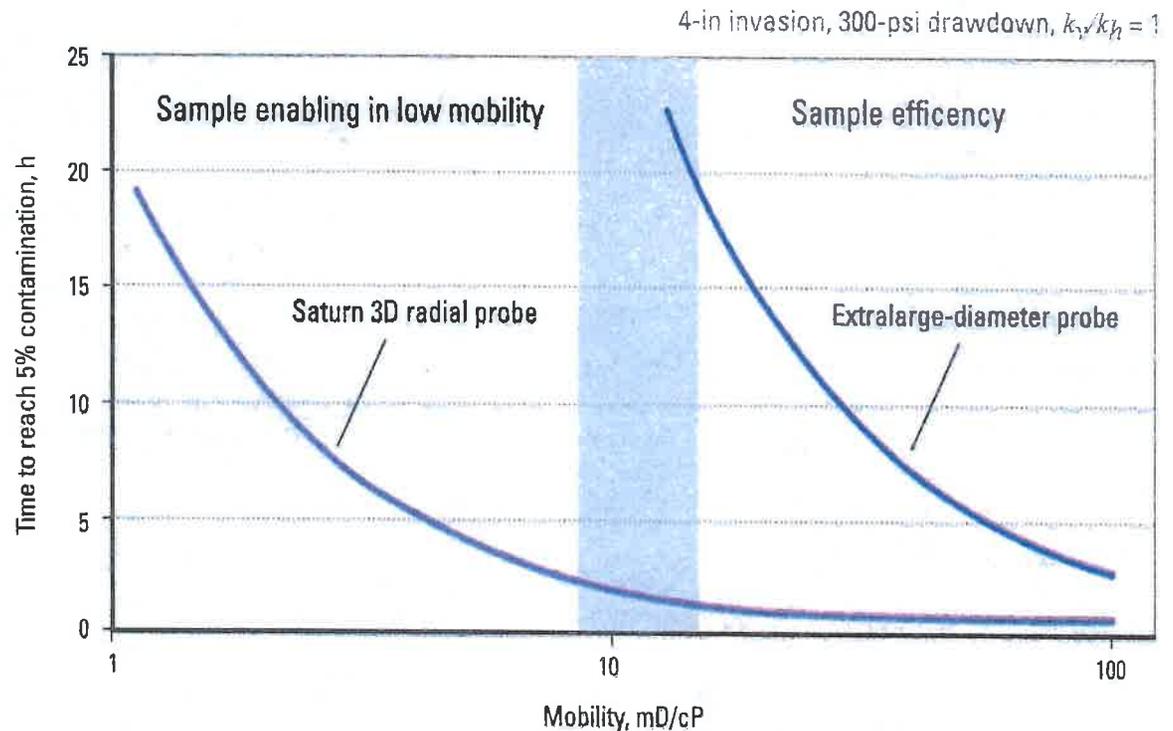
The four Saturn probes efficiently establish circumferential flow from the formation to quickly remove filtrate-contaminated fluid and flow uncontaminated, representative fluid for DFA, sampling, and pressure measurements.

Sealing with confidence

Unlike the packer incorporated in a conventional probe assembly or operations using a dual straddle packer in the testing string, the Saturn probes self-seal with suction to the borehole wall to receive direct flow from the formation with faster cleanup.

Direct rig-time savings in low-permeability formations

As the permeability of a formation decreases, the performance improvement of the Saturn 3D radial probe over conventional probes widens significantly. As shown in comparison with the extralarge-diameter probe for achieving 5% contamination, the Saturn 3D radial probe improves sampling efficiency beginning at formation mobilities of 500 mD/cP, with the performance gap greatly expanding as the mobility decreases. Once mobility approaches 10 mD/cP, the extralarge-diameter probe cannot move the formation fluid, whereas the Saturn 3D radial probe is an enabling technology.



Modeled cleanup times for the Saturn 3D radial probe and a conventional extralarge-diameter probe show the increase in sampling efficiency possible. The Saturn 3D radial probe is an enabling technology for sampling at mobilities less than 10 mD/cP, at which the conventional probe cannot perform.

Complete pressure surveys in low-mobility formations

The technology that makes the Saturn 3D radial probe excel at fluid extraction also delivers a step change in formation pressure testing. Conventional formation tester probes with the largest surface flow area currently available are limited to pressure testing formations with mobilities no lower than about 1 mD/cP. Pretesting-only service is the current benchmark for excellent performance in low-permeability formations, but the mobility limit for pressure tests is about 0.1 mD/cP.

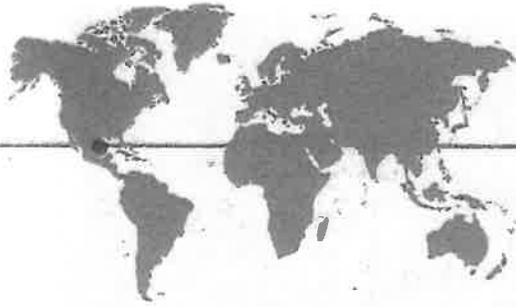
The Saturn 3D radial probe, with 79.44 in² of surface flow area, can perform pressure tests at mobilities as low as 0.01 mD/cP. In addition to its unprecedented pressure-testing capability in very tight formations, the Saturn 3D radial probe has proved far less susceptible to supercharging. Conducted with the MDT Pumpout Module, Saturn pressure tests produce significantly more fluid than during a conventional probe test.

Circumferential support for unconsolidated formations

The circumferential self-sealing technology of the Saturn 3D radial probe mechanically supports the borehole with the compliant rubber seal of its drain assembly throughout the sampling operation. Pressure drawdown is localized to the four elliptical suction probes, which minimizes the matrix stress while flowing fluid. If any matrix disengages while flowing fluid, the Saturn 3D radial probe is equipped with sandface filtering mechanisms on each of the probes to prevent plugging of the system.



Case Studies



Saturn probe retrieves uncontaminated 7.5-API oil from friable sandstone

Accurate fluid description and determination of pressure differentials were needed to guide well placement and completion in an onshore Mexico field to avoid the development of preferential flow along higher-mobility intervals. However, the combination of a poorly consolidated formation, with unconfined compressive strength (UCS) values ranging from 100 to 800 psi, and high-viscosity fluid content meant that the pressure differential generated by conventional formation testing inevitably caused collapse of the wellbore wall and failure of the seal or sanding out of the tool.

The operator had to resort to temporarily perforating, completing, and flowing each sand separately to collect samples in coiled tubing-deployed bottles on a DST string. The complicated logistics and high costs of this approach were not sustainable.

Unlike single-probe conventional formation testers, the Saturn 3D radial probe is ideal for flowing fluid in these challenging conditions of an unconsolidated reservoir with low mobility. The four self-sealing elliptical probes, with the industry's largest surface flow area of more than 79 in², quickly establish and maintain flow from the entire circumference of the wellbore instead of funneling fluid from the reservoir to a single access point. The result is quicker cleanup and the efficient performance of pressure measurements.

In unconsolidated formations, the compliant rubber surface of the Saturn drain assembly mechanically supports the borehole throughout the sampling operation. Pressure drawdown is localized to the four elliptical probes, which minimizes matrix stress while fluid is flowing.



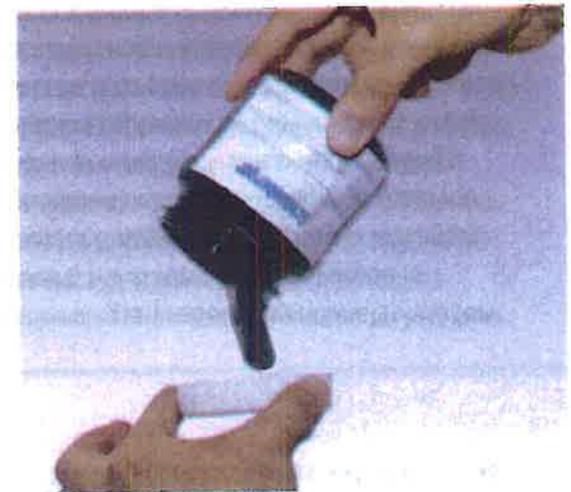
Each self-sealing Saturn probe incorporates a filter to capture any dislodged matrix and prevent plugging.

If sand grains were drawn in with the flowing fluid, the Saturn drain assembly incorporates individual probe filters to prevent flowline plugging.

The Saturn 3D radial probe was deployed in the field to test and sample at multiple stations in several wells, which have up to 12% ovalization. Whereas conventional probes commonly experienced lost seals in the rugose holes, the Saturn self-sealing probes maintained seal integrity to support the borehole in the unconsolidated sandstone reservoirs. There was no evidence of sand grains reaching the pumps.

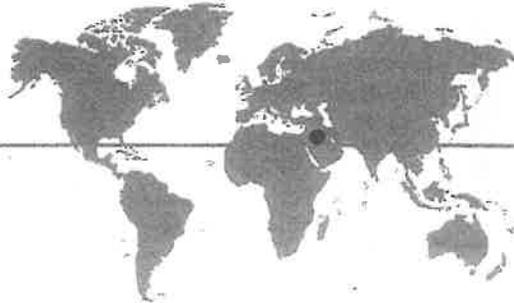
Full pressure surveys were conducted in both water- and oil-base mud environments with only minor storage effects observed in the pressure responses. The pressure surveys in combination with the mobilities determined from every pretest are being used to design completions that will evenly distribute injected steam among designated intervals and avoid channeling.

Fluid sampling successfully captured an uncontaminated sample of 7.5-API oil; subsequent laboratory analysis reported a viscosity of approximately 1,030 cP at downhole conditions. Being able to use the Saturn 3D radial probe to collect what were previously unobtainable high-quality samples and pressure data is providing a wealth of information for the operator.



The Saturn 3D radial probe collected an uncontaminated sample of 7.5-API oil from an unconsolidated sandstone reservoir without sanding or seal failure.

Case Study



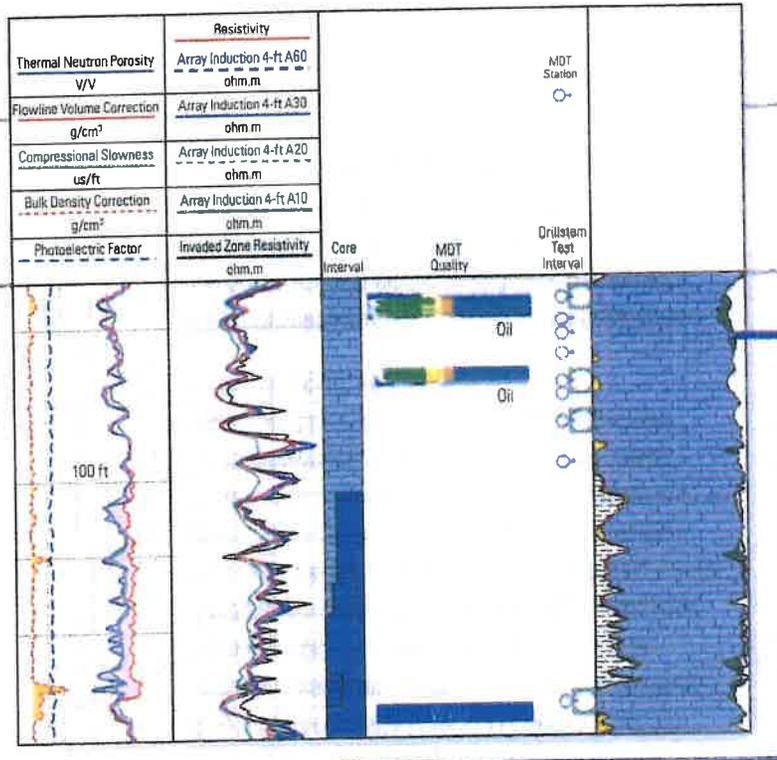
Saturn probe delineates low-mobility oil zone in carbonate reservoir

The extent of the oil zone in a tight carbonate reservoir in a Middle East field was not clear. Openhole logs strongly indicated that the top of the formation was oil bearing and the bottom was water-wet, but the fluid contents of the middle zone were ambiguous. The middle zone had a lower resistivity response that was similar to that in the underlying water zone. The location of the oil/water contact could not be determined from the logs alone, and conventional formation tester probes would not be able to acquire fluid samples from the tight formation.

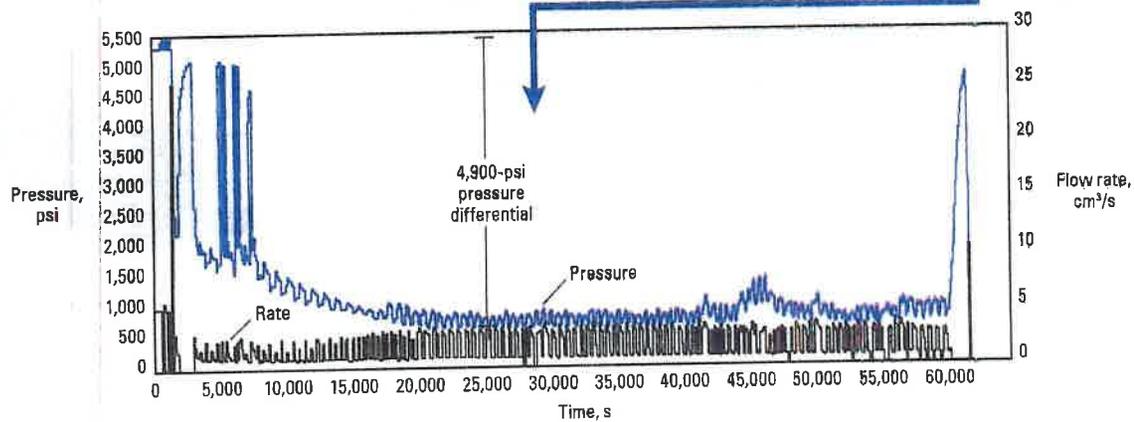
By establishing true 3D circumferential flow around the borehole in the low-permeability formation, the Saturn 3D radial probe successfully collected samples from the top, middle, and bottom of the carbonate reservoir.

Extensive pumpout by the Saturn probe confirmed light oil in the top zone through DFA. A radial flow regime was established with an estimated horizontal permeability of approximately 1 mD. The station in the bottom zone yielded water and had a similar permeability.

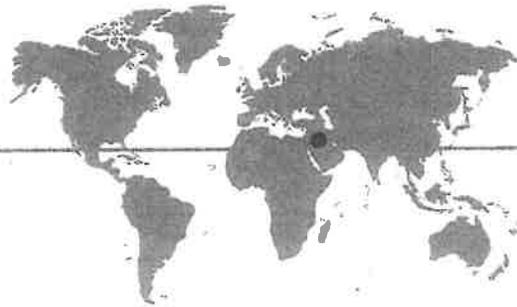
DFA then identified mobile light oil in the middle of the reservoir, and the operator was able to determine the thickness of the oil zone with confidence. Pumpout for the middle station was achieved with a 4,900-psi pressure differential for 15 h, resulting in a mobility determination of 0.04 mD/cP.



Mobile oil was acquired by the Saturn 3D radial probe at the top and middle stations to favorably place the oil/water contact compared with the ambiguous low-resistivity logs. The bottom pressure plot shows the pressure differential applied over an extensive pumpout at the middle station to retrieve representative oil from the carbonate reservoir, with a mobility of 0.04 mD/cP.



Case Study

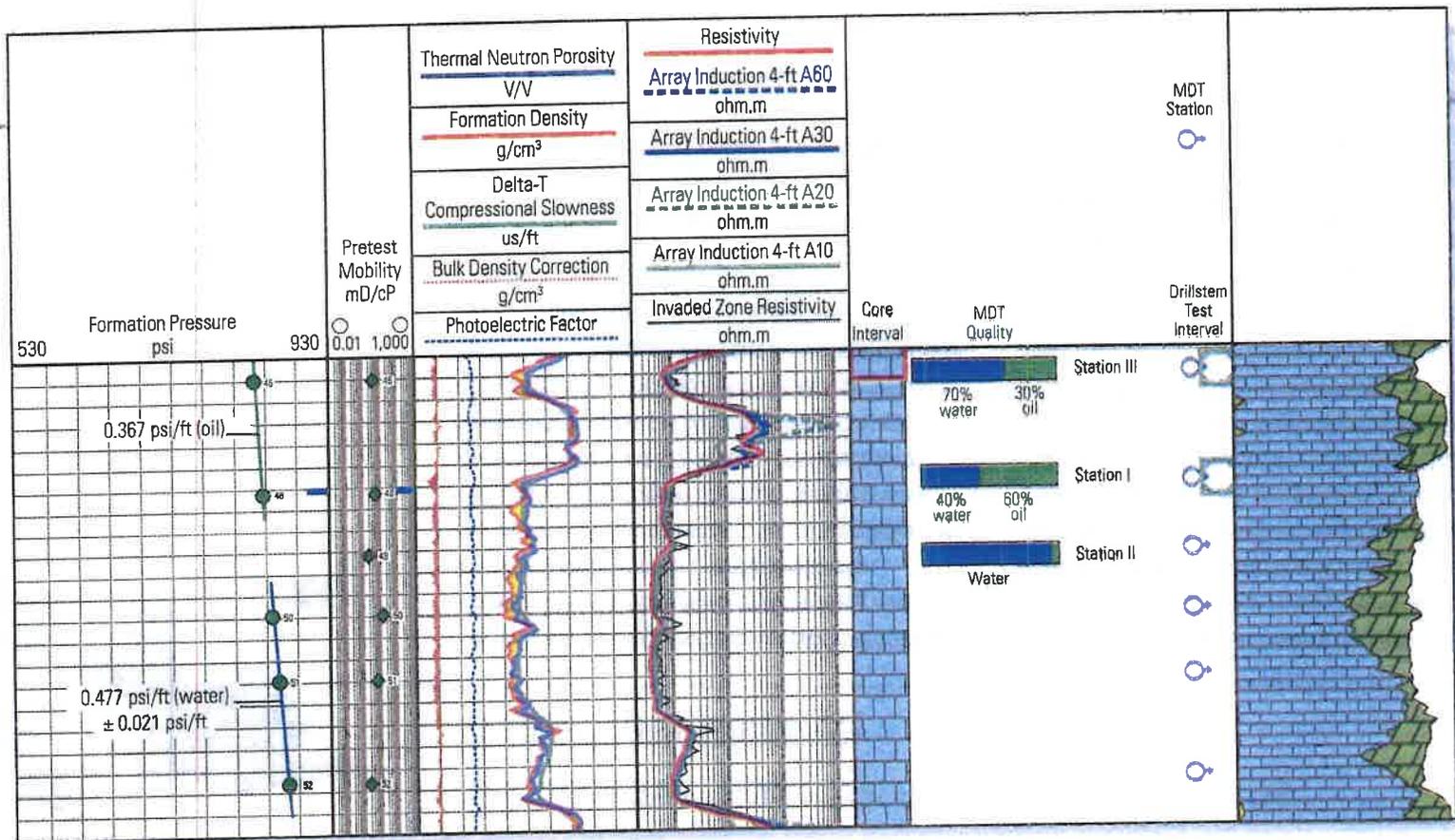


650% faster flow rate efficiently acquires fluids from dolomite

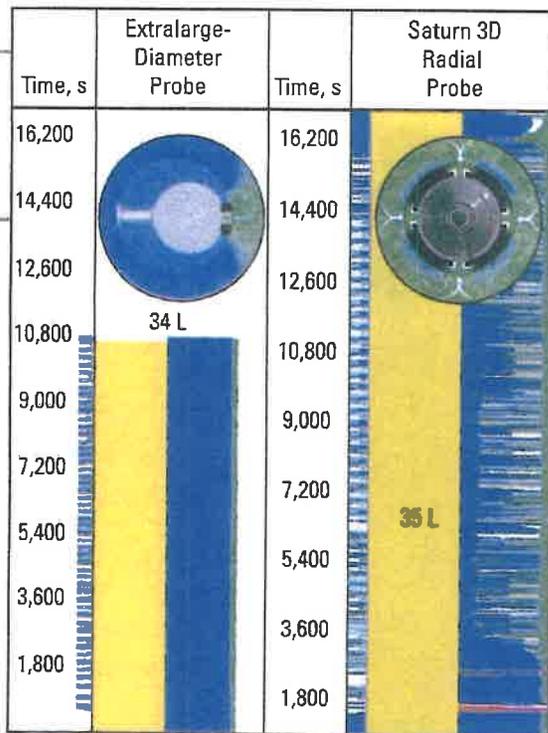
The openhole logs from a dolomitic limestone interval drilled with saline water-base mud in the Middle East did not indicate the presence of hydrocarbon, but the analysis was ambiguous because some zones had resistivity values as low as 0.7 ohm.m. The operator wanted to conduct DFA and collect samples to resolve the identity of the reservoir fluids, but the time allowed at each sampling station was limited to 4 h in consideration of mud losses during the job.

Schlumberger deployed an advanced wireline formation tester toolstring that included both the Saturn 3D radial probe and an extralarge-diameter conventional probe to acquire fluid at multiple stations in a single trip.

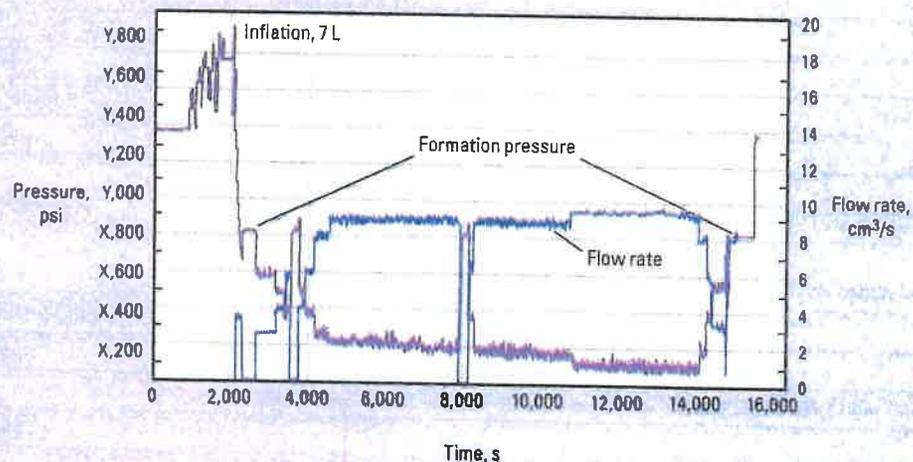
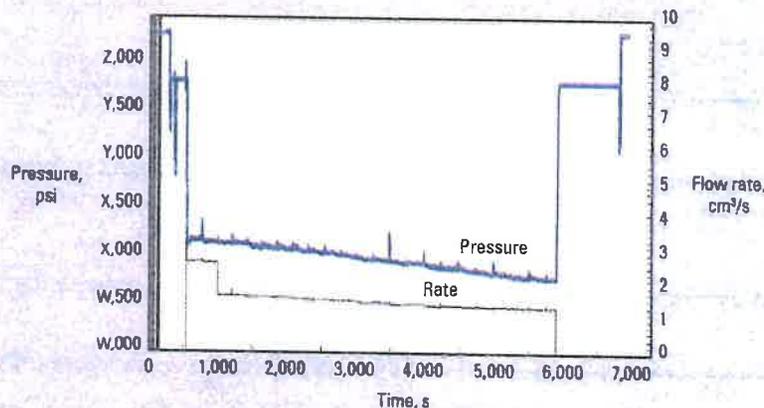
After DFA at Station I clearly identified 60%–70% oil, Station II was selected for determining the lowest mobile oil. The initial sampling attempt with the extralarge-diameter probe experienced a significant pressure drop, with 2,000-psi drawdown and a low flow rate of 5.2 L/h. The resulting pretest mobility was 1.5 mD/cP. After 1.5 h of pumping out, flow was switched to the Saturn 3D radial probe, and the rate increased 650% with only 680-psi drawdown. The performance of the Saturn 3D radial probe for the ratio of rate to pressure drop was a 19-times improvement over that of the extralarge-diameter probe for the 1.5-mD/cP mobility. Flowline resistivity stabilization was achieved with water identification at Station II within the 4-h limit for the well, and the water collected in the sample bottle confirmed the DFA results.



The extralarge-diameter probe was able to collect reservoir fluid at Station I, but after 1.5 h of pumping out at Station II, flow was switched to the Saturn 3D radial probe, which increased the flow rate by 650%.



No oil was observed by the optical analyzers for the 34 L of fluid extracted at Station II by the extralarge-diameter probe (left) at a large drawdown and low rate. Once flow was switched to the Saturn 3D radial probe (right), cleanup was achieved at a rate that was about 3.5 times faster. The insets show how the fluid flow in the reservoir is to a single point for the conventional probe but circumferentially for the four self-sealing Saturn probes.



Comparison of pressure and rate of the extralarge-diameter probe (left) and Saturn 3D radial probe (right) at Station II shows that the Saturn probe increased the flow rate 650% with only 680-psi drawdown, which is one-third of the conventional single probe's drawdown. The resulting ratio of rate to pressure drop delivered an improvement of 19 times over the single probe's performance.



Specifications

Saturn 3D Radial Probe

Measurement

Output	Ultralow-contamination formation fluids, formation pressure, fluid mobility
Logging speed	Stationary
Mud type or weight limitations	None
Combinability	Fully integrates with MDT modular formation dynamics tester system and InSitu Family* sensors
Special applications	Low-permeability formations, heavy oil, near-critical fluids, unconsolidated formations, and rugose boreholes

Mechanical

Temperature rating	350 degF [177 degC]
Pressure rating	20,000 psi [138 MPa]
Borehole size—min.	7.875 in [20.00 cm]
Borehole size—max.	9.5 in [24.13 cm]
Max. hole ovality	20%
Outside diameter	Tool body: 4.75 in [12.06 cm] Drain assembly: 7 in [17.78 cm]
Length	5.7 ft [1.74 m] With Modular Reservoir Sonde and Electronics (MRSE): 12.4 ft [3.78 m]
Weight (in air)	385 lbm [175 kg] With MRSE: 585 lbm [265 kg]

Saturn



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APPENDIX E

**RISK ASSESSMENT EMERGENCY REMEDIAL
AND RESPONSE**

Stage	Risk	Description	Severity	Likelihood	Monitoring	Control In Place	Potential Response Actions	Response Personnel
Construction Period	Well control event while drilling or completing the well with loss of containment.	This event could occur during drilling and completion operations if the hydrostatic column controlling the well decreases below the formation pressure, allowing fluids to enter the well suddenly.	Serious	Unlikely	<ul style="list-style-type: none"> * Flow sensor. * Pressure sensor. * Tank level indicator. * Tripping displacement practices. * Mud weight control. 	<ul style="list-style-type: none"> * Blowout prevention (BOP) equipment. * Kill fluid. * Well control training. * BOP testing protocol. * Kick drill. * Lubricators for wireline operations. 	<p>Drilling:</p> <ul style="list-style-type: none"> * Stop operation. * Close BOP. * Clear floor and secure area. * Execute well control procedure. * Evaluate drilling parameters to identify root cause. * Continue operations. <p>Completion:</p> <ul style="list-style-type: none"> * Stop operations. * Close BOP. * Clear floor and secure area. * Execute well control procedure. * Continue operations. 	<ul style="list-style-type: none"> * Rig crew * Rig manager * Field superintendent * Project manager
Construction Period	Movement of brine between formations during drilling.	This event could occur if, while drilling the injection target, there is cross flow, with losses into the USDW.	Minor	Unlikely	<ul style="list-style-type: none"> * Tank level sensor. * Mud lab test. * Pressure sensors. * Flow sensors. * Tripping sheets. 	<ul style="list-style-type: none"> * USDW will be covered with the surface casing and set in Pierre Formation. * Casing test after cementing surface casing to check integrity. * FIT test to verify shoe integrity. * Mud used in surface casing are based on fresh water and clays. * CBL to check cement bonding. 	<ul style="list-style-type: none"> * Stop drilling. * Check well level to detect a lost circulation or influx. * In case of losses, treat the well with lost circulation material, and evaluate mud weight and drilling parameters. * In case of influx, control the well, without compromising the shoe integrity. * In case shoe is identified as leaking, squeeze to regain integrity. * In case surface casing shows a leak, squeeze or install a casing patch. 	<ul style="list-style-type: none"> * Rig crew * Rig manager * Field superintendent
Injection Period	Loss of mechanical integrity injection wells – tubing/packer leak.	This event could occur because of corrosion, damage in the tubulars during installation, fatigue, higher load profiles, and others and could cause communication of formation fluids with the annular casing tubing as well as sustained casing pressure. There is no LOC in this scenario.	Serious	Likely	<ul style="list-style-type: none"> * Pressure and temperature gauges on surface and downhole real time. * Electromagnetic casing inspection log. * Annular pressure test * CO₂ leak sensors on the wellhead 	<ul style="list-style-type: none"> * Coated tubing. * Inhibited packer fluid in annular. * Corrosion monitoring plan. * Dry CO₂ injected. * Nickel-plated packers. * FF trim tubing hanger and tree. * CR tubing tailpipes below packers. * CR or Inconel carrier for the sensors. * New tubing. 	<ul style="list-style-type: none"> * Trigger alarm by the system, monitoring personnel, or operations engineer. * Follow protocol to stop operation, vent, or deviate CO₂. * Troubleshoot the well. * If tubing leak is detected, discuss with regulator the action plan based on the finding. * Schedule well service to repair tubing. 	<ul style="list-style-type: none"> * Operation engineer * Field superintendent * Project manager
Injection Period PostInjection	Loss of mechanical integrity monitoring wells – tubing/packer leak.	This event could occur because of corrosion, damage in the tubulars during installation, fatigue, higher load profiles, and others and could cause a communication of the formation fluids with the annular casing tubing as well as sustained casing pressure. There is no LOC in this scenario. Monitoring wells are designed to be outside of the projected plume for the majority of the project which reduces the risk of contact with CO ₂ .	Minor	Unlikely	<ul style="list-style-type: none"> * Pressure and temperature gauges on surface and downhole real time. * Electromagnetic casing inspection log. * Annular pressure test. * CO₂ leak sensors on the wellhead. 	<ul style="list-style-type: none"> * Coated tubing. * Inhibited packer fluid in annular. * Corrosion monitoring plan. * Nickel-plated packers * CR tubing below/between packers. * CR or Inconel carrier for the sensors. * New tubing. 	<ul style="list-style-type: none"> * Trigger alarm by the system, monitoring personnel, or operations engineer. * Troubleshoot the well. * If tubing leak is detected, discuss with regulator the action plan for well service. * Schedule well service to repair tubing or abandon the well. 	<ul style="list-style-type: none"> * Operation engineer * Field superintendent * Project manager * Rig crew and DH contractors

Injection Period	Loss of mechanical integrity injection wells – casing leak.	This event could occur because of corrosion, damage in the tubulars during installation, fatigue, higher load profiles, or others. This event could cause a migration of CO ₂ and brines through the casing, the cement sheet, and into different formations of the injection target or into USDW.	Serious	Unlikely	<ul style="list-style-type: none"> * Pressure and temperature gauges on surface and downhole real time. * Electromagnetic casing inspection log. * CO₂ leak sensors on the wellhead. * DTS fiber real time alongside the casing. * Flow rate monitoring. * Soil gas probes. * Neutron activated logs. * USDW water monitoring. 	<ul style="list-style-type: none"> * CO₂-resistant cement and metallurgic across injection zone. * Injection through tubing and packer. * Nickel-plated packers. * CR or Inconel carrier sensors. * Inhibited packer fluid in the annular. * Cement to surface. * Corrosion monitoring plan. * CBL/USIT after installation. * New casing and tubing installed. 	<ul style="list-style-type: none"> * Trigger alarm by the system, monitoring personnel, or operations engineer. * Follow protocol to stop operation, vent, or deviate CO₂. * Troubleshoot the well. * Evaluate if there is a movement of CO₂ or brines to USDW. In the remote event that USDW gets affected, discuss remediation options with the regulatory agency. * If casing leak is detected, discuss with regulator the action plan based on the finding and location of the leak. * Schedule well service to repair the casing. 	<ul style="list-style-type: none"> * Operation engineer * Field superintendent * Project manager * Rig crew and DH contractors * Remediation contractors
Injection Period Postinjection	Loss of mechanical integrity monitoring wells – casing leak.	This event could occur because of corrosion, damage in the tubulars during installation, fatigue, higher load profiles, and others. This event could cause a migration of CO ₂ and brines through the casing, the cement sheet, and into different formations of the injection target or into USDW. Monitoring wells are designed to be outside of the projected plume for the majority of the project which minimizes the risk of contact with CO ₂ .	Serious	Unlikely	<ul style="list-style-type: none"> * Pressure and temperature gauges on surface and downhole real time. * Electromagnetic casing inspection log. * CO₂ leak sensors on the wellhead. * Soil gas probes. * Neutron activated logs. * USDW water monitoring. 	<ul style="list-style-type: none"> * CO₂-resistant cement across injection zone. * Nickel-plated packers. * CR or Inconel carrier sensors. * Inhibited packer fluid in the annular. * Cement to surface. * Corrosion monitoring plan. * CBL/USIT after installation. * New casing and tubing installed. 	<ul style="list-style-type: none"> * Trigger alarm by the system, monitoring personnel, or operations engineer. * Troubleshoot the well. * Evaluate if there is a movement of CO₂ or brines to USDW. In the remote event that USDW gets affected, discuss remediation options with the regulatory agency. * If casing leak is detected, discuss with regulator the action plan based on the findings and the location of the leak. * Schedule well service to repair the casing. 	<ul style="list-style-type: none"> * Operation engineer * Field superintendent * Project manager * Rig crew and DH contractors * Remediation contractors
Injection Period	LOC: vertical migration via injection wells.	<p>During the life of the injector wells, there are induced stresses and chemical reactions on the tubulars and cement exposed to the CO₂ pressure and plume.</p> <p>Changes in temperature and injection pressure create stresses in the tubulars trying to expand or contract, and it can lead to microannulus effects.</p> <p>The combination of the dry CO₂ injected and the formation brines creates carbonic acid that reacts with the components of the cement to degrade properties such as permeability, strength, porosity, etc., weakening the matrix.</p> <p>These mechanics could lead to cracks, channels, or simply permeable paths inside the cement that could connect the injection zone with those above the storage complex, causing migration of brines/CO₂.</p>	Serious	Unlikely	<ul style="list-style-type: none"> * CO₂ leak sensors on the wellhead. * DTS fiber real time alongside the casing. * Soil gas probes. * USDW water monitoring. * Neutron activated logs to be run for external MI. * Pressure gauges at surface. * Flow rate monitoring. 	<ul style="list-style-type: none"> * CO₂-resistant cement and metallurgic across injection zone. * Injection through tubing and packer. * Cement to surface. * CBL/USIT after installation. * USDW covered as second barrier with surface casing and surface cement sheet. * New casing installed. 	<ul style="list-style-type: none"> * Trigger alarm by the system, monitoring personnel, or operations engineer. * Follow protocol to stop operation, vent, or deviate CO₂. * Troubleshoot the well. * Evaluate if there is a movement of CO₂ or brines to USDW. In the remote event that USDW gets affected, discuss with regulatory agency remediation options, action plan, and monitoring program. * Discuss with regulator the action plan to repair the well or P&A based on the findings of the assessment. 	<ul style="list-style-type: none"> * Operation engineer * Field superintendent * Project manager * Rig crew and DH contractors * Remediation contractors

Injection Period Postinjection	LOC: vertical migration via monitoring wells.	<p>During the life of the monitoring wells, there are induced stresses and chemical reactions on the tubulars and cement-exposed brines, pressure plume and, eventually, CO₂.</p> <p>These mechanics could lead to cracks, cement deterioration, channels, or simply permeable paths inside the cement that could connect the injection zone with those above the storage complex, causing migration of brines/CO₂.</p> <p>Monitoring wells are designed to be outside of the plume for the majority of the injection period.</p>	Serious	Unlikely	<ul style="list-style-type: none"> * CO₂ leak sensors on the wellhead. * Soil gas probes. * USDW water monitoring. * Neutron activated logs to be run for external MI. * Pressure gauges at surface. 	<ul style="list-style-type: none"> * CO₂-resistant cement across injection zone. * Cement to surface. * CBI/USIT after installation. * USDW covered as second barrier with surface casing and surface cement sheet. * New casing installed. 	<ul style="list-style-type: none"> * Trigger alarm by the system, monitoring personnel, or operations engineer. * Troubleshoot the well. * Evaluate if there is a movement of CO₂ or brines to USDW. In the remote event that USDW gets affected, discuss with regulatory agency remediation options, action plan, and monitoring program. * Discuss with regulator action plan to repair the well or P&A based on the findings of the assessment. 	<ul style="list-style-type: none"> * Operation engineer * Field superintendent * Project manager * Rig crew and DH contractors * Remediation contractors
Injection Period Postinjection	LOC: vertical migration via water disposal well in Inyan Kara.	This scenario could occur if there is a LOC in the CO ₂ injector well through poor cement or cracks that could allow movement of carbonic acid into the Inyan Kara Formation. Inyan Kara is the main target for water disposal in the area. If carbonic acid gets in contact with the cement and casing for the water disposal well, corrosion and cement degradation could happen, with a potential path to USDW.	Serious	Unlikely	<ul style="list-style-type: none"> * CO₂ leak sensors on the wellhead. * Soil gas probes. * USDW water monitoring. * Neutron activated logs to be run for external MI or tracers. * Pressure gauges at surface. 	<ul style="list-style-type: none"> * Evaluate CO₂-resistant cement through Inyan Kara in the water disposal well. * Validate Class I well will cover USDW to Pierre as well. * Recommended to include water disposal well in corrosion monitoring plan. 	<ul style="list-style-type: none"> * Trigger alarm by the system, monitoring personnel, or operations engineer. * Follow protocol to stop injection. * Troubleshoot the well. * Evaluate if there is a movement of CO₂ or brines to USDW and the source of the leak. * If the injector is the source of the leak, follow protocol for LOC in injectors. * In the remote event that USDW gets affected, discuss with regulatory agency remediation options, action plan, and monitoring program. * Discuss with regulator action plan to repair the well or P&A based on the findings of the assessment. 	<ul style="list-style-type: none"> * Operation engineer * Field superintendent * Project manager * Rig crew and DH contractors * Remediation contractors
Injection Period Postinjection	LOC: vertical migration via legacy wells and P&A wells.	Brines and CO ₂ could migrate through poor cement bonding, cement degradation, or cracking in the cement in P&A wells.	Serious	Unlikely	<ul style="list-style-type: none"> * Soil gas probes. * CO₂ leak sensors. * 4D seismic survey (AOR review periods). 	<ul style="list-style-type: none"> * Legacy wells are properly abandoned for brine movement because of pressurization of injection zone. * Injectors will be abandoned as soon as CO₂ injection in the HUB ends, except if they are left as monitoring wells. 	<ul style="list-style-type: none"> * Trigger alarm by the system, monitoring personnel, or operations engineer. * Evaluate if it's a positive CO₂ release because of a leak in the legacy/P&A well. * Discuss plan with regulator to repair the well, delineate the area, and identify potential resources affected. * Discuss specific remediation actions and monitoring plans. * Execute program, monitor, and evaluate efficacy. 	<ul style="list-style-type: none"> * Operation engineer * Field superintendent * Project manager * Rig crew and DH contractors * Remediation contractors
Injection Period	LOC: vertical migration due to failure of confining rock, faults, or fractures.	This event can occur if, during injection, the pressurization of the injection zone exceeds the sealing capacity of the cap rock/seal above or if there are features such as fault or fractures that are reactivated. CO ₂ and brine could find a leak path to a shallower formation, including USDW.	Serious	Unlikely	<ul style="list-style-type: none"> * USDW water sampling. * 4D seismic survey. * Neutron activated log in injector and monitoring wells. * Gas soil monitoring. 	<ul style="list-style-type: none"> * Seismic survey in the area shows no faults crossing the storage formation or the seal. * Injection is limited to 90% of frac gradient. * Extensive characterization of the rocks show good sealing capacity. * In case cap rock above Broom Creek fails, Inyan Kara underpressure zone will act as a buffer formation before CO₂ or brines reaching USDW. 	<ul style="list-style-type: none"> * Trigger alarm by the system, monitoring personnel, or operations engineer. * Follow protocol to stop injection. * Assess root cause by reviewing monitoring data. * If required, conduct geophysical survey to delineate potential leak path. * Evaluate if there is a movement of CO₂ or brines to USDW. In the event that USDW gets affected, discuss with regulatory agency remediation options, action plan, and monitoring program. * Actions to restore injection will depend on the nature of the leak path and the extent. Operator needs to reevaluate model and discuss action plan with regulator. 	<ul style="list-style-type: none"> * Monitoring staff * Geologist * Reservoir engineer * Project manager * Remediation contractors

Injection Period Postinjection	LOC: lateral migration of CO ₂ outside defined AoR.	This event could occur if the CO ₂ plume moves faster or in an unexpected pattern and expands beyond the secured pore space for the project and the AoR.	Serious	Unlikely	<ul style="list-style-type: none"> * 4D seismic. * Neutron activated logs in monitoring wells. * Pressure and temperature gauges real time in monitoring wells. 	<ul style="list-style-type: none"> * Detailed geologic model with stratigraphic wells as calibration. * Seismic survey integrated in the model. * Extensive characterization of the rocks and formation. * AoR review and calibration at least every 5 years. * Monitor the plume until stabilization (min 10 years). 	<p>Injection period:</p> <ul style="list-style-type: none"> * Trigger alarm by monitoring staff. * Review monitoring data and trends, and compare with the simulation. * Discuss with regulatory agency the findings, and request to keep injection process while AoR is reviewed, if the data show that CO₂ will stay in the secured pore space. * Perform logging in monitoring wells. * Conduct geophysical survey as required to evaluate AoR. * Recalibrate model, and simulate new AoR. * Assess if additional corrective actions are needed and if it's required to secure additional pore space. * Assess if any remediation is needed, and discuss action plan with regulatory agency. * Present AoR review to regulatory agency for approval and adjust monitoring plan. <p>Postinjection period:</p> <ul style="list-style-type: none"> * Trigger alarm by monitoring staff. * Review monitoring data and trends, compare with the simulation. * Discuss findings with regulatory agency. * Conduct geophysical survey as required to evaluate AoR. * Recalibrate model, and simulate new AoR. * Assess if additional corrective actions are needed and if it's required to secure additional pore space. * Assess if any remediation is needed, and discuss action plan with regulatory agency. 	<ul style="list-style-type: none"> * Monitoring staff * Geologist * Reservoir engineers * Project manager
Injection Period	External impact – injector well.	This event could occur if, during injection, the wellhead is hit by a massive object that causes major damages to the equipment. The well gets disconnected from the pipeline and from the shutoff system and leads to a loss of containment of CO ₂ and brine.	Major	Unlikely	<ul style="list-style-type: none"> * Pressure, temperature, and flow sensors in real time. * Field inspections. * OGI cameras. 	<ul style="list-style-type: none"> * Fence location and block direct access to the wellhead. * No populated area. * Doubled lined pads. * Location is able to contain 70.000 bbl, and additional transfer pump and lines are designed to move fluid to the settling ponds southwest of the location. 	<ul style="list-style-type: none"> * Trigger alarm by the system or operations staff. * Follow protocol to shut down CO₂ delivery if the automatic shutoff device is not functional. * If there is injured personnel, call emergency team, and execute evacuation protocol. * Contact the field superintendent to activate emergency plan. * Clear the location, and secure the perimeter. If possible, install containment devices around the location. * Contact well control special team to execute blowout emergency plan that may include but is not limited to capping the well, secure location, drill relief well to kill injector, properly repair or abandon injection well. This plan would be discussed with the regulatory agency. * Evaluate environmental impact (soil, water, fauna, vegetation), and present remediation plan to the Commission for approval. * Execute remediation, and install monitoring system as needed. 	<ul style="list-style-type: none"> * Operation engineer * Field superintendent * Project manager * Rig crew and DH contractors * Remediation contractors * Well control specialist

Injection Period Postinjection	External impact -- monitoring well.	This event could occur if the wellhead of the deep monitoring well is hit by a massive object that causes major damages leading to a LOC. Since the well is open to the formation pressure at the injection zone, formation fluids have the potential to flow and spill on the location.	Major	Unlikely	<ul style="list-style-type: none"> * Pressure, temperature, and flow sensors in real time. * Field inspections. * OGI cameras. 	<ul style="list-style-type: none"> * Fence location, and block direct access to the wellhead. * No populated area. * Lined pads. * Reduced pressure in the monitoring well compared with the injector well on bottom. 	<ul style="list-style-type: none"> * Trigger alarm by the system or operations staff. * If there is injured personnel, call emergency team and execute evacuation protocol. * Contact the field superintendent to activate emergency plan. * Clear the location, and secure the perimeter. If possible, install containment devices around the location. * Contact well control special team to execute blowout emergency plan that may include, but is not limited to, capping the well, securing the location, drilling relief well to kill the injector, properly repairing, or abandoning the injection well. This plan would be discussed with the regulatory agency. * Evaluate environmental impact (soil, water, fauna, vegetation), and present remediation plan to the Commission for approval. * Execute remediation, and install monitoring system as needed. 	<ul style="list-style-type: none"> * Operation engineer * Field superintendent * Project manager * Rig crew and DH contractors * Remediation contractors * Well control specialist
Injection Period	External Impact -- pipeline.	This event could occur if, during injection, the CO ₂ pipeline is hit, causing major damages and LOC of the CO ₂ .	Major	Unlikely	<ul style="list-style-type: none"> * Pressure, temperature, and flowmeter sensors in real time. * Field inspections. * OGI cameras? 	<ul style="list-style-type: none"> * Buried pipe. * Bollards and/or concrete barriers installed to protect aboveground piping at valve stations. * Painting for visibility in varied weather conditions. * Signage along right of way as needed. * One-call 811 program. 	<ul style="list-style-type: none"> * Trigger alarm by the system or operations staff. * If there is injured personnel, call emergency team, and execute evacuation protocol. * Verify CO₂ flow was shut off by the system, or start protocol to stop flow. * Contact the field superintendent to activate emergency plan. * Clear the location, and secure the perimeter. If possible, install containment devices around the location. * Evaluate environmental impact (soil, water, fauna, vegetation), and present remediation plan to the Commission for approval. * Execute remediation, and install monitoring system as needed. 	<ul style="list-style-type: none"> * Operation engineer * Field superintendent * Remediation contractors * Emergency teams * Plant manager/contact
Injection Period	Monitoring equipment failure or malfunction.	If there is a failure on the monitoring system/ alarm devices, it could lead to overpressurization of the system or reservoir beyond the design limits, causing potential fracturing of the reservoir, leaks or failure on equipment and tubulars, and damage of the facilities.	Serious	Unlikely	<ul style="list-style-type: none"> * Real-time monitoring system and redundancy. * Field inspections. 	<ul style="list-style-type: none"> * Preventive maintenance. * Periodic inspections. 	<ul style="list-style-type: none"> * Trigger alarm by the system or operations staff. * If there is injured personnel or property damage, contact the field superintendent to activate emergency evacuation and secure location. * Assess mechanical integrity of the system, and propose repair actions if needed. * Assess any potential environmental impact, and discuss remedial action with the Commission if needed. * If the assessment allows resuming injection safely, discuss plan with the Commission, and get approval. * Repair or replace instrumentation. Calibrate equipment. * Review monitoring records, and if needed, perform an injectivity test or falloff test to evaluate reservoir. 	<ul style="list-style-type: none"> * Operation engineer * Field superintendent * Project manager * Remediation contractors * Emergency teams * Geologist * Reservoir engineers * Monitoring staff

Injection Period	Induced seismicity.	This event could occur if pressurization of the reservoir, during Injection of CO ₂ , activates preexisting fault planes and creates a displacement that causes a seismic event. If it's a major event (>2.7 Richter), it could compromise the integrity of the wells, facilities, or pipeline.	Major	Unlikely	<ul style="list-style-type: none"> * Geophones array in surface to monitor induced seismicity. * Geophones/DAS fiber. 	<ul style="list-style-type: none"> * Seismic survey of the storage complex shows no faults that could be reactivated. * A detailed geomechanical model was created to evaluate the storage complex. * The region is seismically stable. 	<p>Event < 2.7 Richter:</p> <ul style="list-style-type: none"> * Trigger alarm by monitoring personnel. * Review monitoring parameters to validate normal operations. If parameters indicate a potential mechanical integrity failure, follow procedure for Event > 2.7 Richter. * Compare storage behavior with the model, and if needed, propose adjustment in operating conditions. <p>Event > 2.7 Richter</p> <ul style="list-style-type: none"> * Trigger alarm by the system or operations staff. * If there is injured personnel or property damages, contact the field superintendent to activate emergency evacuation and secure location. * Follow protocol to stop injection. * Assess mechanical integrity of the system, and propose repair actions based on the findings. * Assess any potential environmental impact, and discuss remedial action with the Commission if needed. * Review regional information as well as monitoring records to determine the origin of the event (natural or induced). * If it's an induced event, reevaluate model, define new Injection parameters, and get approval from the Commission. * If the assessment allows resuming injection safely, increase surveillance to validate effectiveness of the actions. 	<ul style="list-style-type: none"> * Operation engineer * Field superintendent * Project manager * Remediation contractors * Emergency teams * Geologist * Reservoir engineers * Monitoring staff
Injection Period Postinjection	Major seismic event.	Major natural seismic event.	Major	Unlikely	<ul style="list-style-type: none"> * Geophones array in surface to monitor induced seismicity. * Geophones/DAS fiber. 	<ul style="list-style-type: none"> * The region is seismically stable. 	<p>Event < 2.7 Richter:</p> <ul style="list-style-type: none"> * Trigger alarm by monitoring personnel. * Review monitoring parameters to validate normal operations. If parameters indicate a potential mechanical integrity failure, follow procedure for Event > 2.7 Richter. <p>Event > 2.7 Richter</p> <ul style="list-style-type: none"> * Trigger alarm by the system or operations staff. * If there is injured personnel or property damage, contact the field superintendent to activate emergency evacuation and secure location. * Follow protocol to stop injection (injection period). * Assess mechanical integrity of the system, and propose repair actions based on the findings. * Assess any potential environmental impact, and discuss remedial action with the Commission if needed. * Review regional information as well as monitoring records to determine the origin of the event (natural or induced). * If the assessment allows resuming injection safely, increase surveillance to validate effectiveness of the actions (injection period). 	<ul style="list-style-type: none"> * Operation engineer * Field superintendent * Project manager * Remediation contractors * Emergency teams * Geologist * Reservoir engineers * Monitoring staff

Injection Period Postinjection	Other major natural disaster.	This scenario could occur in the event of a natural disaster that limits or endangers the normal operation of the Hub.			n/a	n/a	<ul style="list-style-type: none"> * Trigger alarm by the system or operations staff. * If there is injured personnel or property damage, contact the field superintendent to activate emergency evacuation and secure location. * Follow protocol to stop injection. * Assess mechanical integrity of the system, and propose repair actions based on the findings. * Assess any potential environmental impact, and discuss remedial action with the Commission if needed. * If the assessment allows resuming injection safely, increase surveillance to validate effectiveness of the actions. 	<ul style="list-style-type: none"> * Operation engineer * Field superintendent * Project manager * Remediation contractors * Emergency teams * Geologist * Reservoir engineers * Monitoring staff
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APPENDIX F
CORROSION CONTROL MATRIX



Corrosion Threat Assessment – Damage Mechanism

Corrosion Damage Mechanism Category

System	Component/ Equipment	Internal Corrosion Mechanism				External Corrosion			Environmental Induced Cracking		Mechanical and Metallurgical			
		CO ₂ Corrosion	Deadleg Corrosion	Wet H ₂ S Corrosion	Microbiological Corrosion	Atmospheric Corrosion	Corrosion under Insulation (CUI)	Soil Corrosion	CO ₂ Corrosion	Chloride SCC	Wet H ₂ S Damage	Erosion	Fatigue	Brittle Fracture
Downhole Equipment	Tubing, nipples, X/O	x							x					
Downhole Equipment	Casing	x							x					
Downhole Equipment	P/T gauges and carriers	x												
Downhole Equipment	Electric cable	x												
Downhole Equipment	Packers	x							x					
Downhole Equipment	Injection well wellhead	x				x								
Downhole Equipment	Injection well tree	x				x								
Downhole Equipment	Injection well tubing hanger	x												
Downhole Equipment	Monitoring well wellhead	x				x								
Downhole Equipment	Monitoring well tree	x				x								
Downhole Equipment	Monitoring well tubing hanger	x												
Downhole Equipment	Tapered long string hangers	x							x					
Surface Piping, Instrumentation, and Pressure Control	Surface piping	x					x							x
Surface Piping, Instrumentation, and Pressure Control	Valves	x					x							x
Surface Piping, Instrumentation, and Pressure Control	Instrumentation	x					x							x
Surface Piping, Instrumentation, and Pressure Control	Injection pressure gauge	x					x							x
Surface Piping, Instrumentation, and Pressure Control	Injection rate meter	x					x							x
Surface Piping, Instrumentation, and Pressure Control	Injection temperature gauge	x					x							x
Surface Piping, Instrumentation, and Pressure Control	Emergency shutdown valve	x					x							x
CO ₂ Pipeline – Buried	API-5L line pipe	x							x					
CO ₂ Pipeline – Surface	API-5L line Pipe	x					x							



Corrosion Control Program – Corrosion Control Matrix

System	Category	Equipment or Component	Damage Mechanism	Mitigation	Monitoring Activity	Location	Frequency	Limits	Consequences	Remedial Action	Remedial Action Responsible Person	Remedial Action Time Limit
Downhole Equipment	Injection Wells	Tubing, Nipples, X/O	CO ₂ Corrosion	<ul style="list-style-type: none"> Dehydrated CO₂ to 630 ppm of H₂O injected. Internal coating applied to the tubing. CR13 specification for tail pipe below packers. Inhibited packer fluid. 	<ol style="list-style-type: none"> Electromagnetic logging. Corrosion coupons. Pressure and temperature gauges. Annular pressure test. 	<ol style="list-style-type: none"> Log run through tubing. Installed upstream injection wellhead. Wellhead and on top of the packer. Surface. 	<ol style="list-style-type: none"> Every 5 years. Quarterly. Real time. Every 5 years. 	<ul style="list-style-type: none"> Failure detected. High risk assessed by the monitoring technique. 	<p>Stop of Injection is required by permit once the failure is detected.</p> <ol style="list-style-type: none"> Stop injection. Troubleshoot the well. If loss of mechanical integrity is validated, prepare workover proposal. Inform Commission within 24 hr and discuss with action plan. Pull tubing and packer scanning. Run casing inspection log. If well has casing integrity, run back completion hydrotesting. Perform annular pressure test. Run CIL log through tubing. Perform falloff test. Perform root cause analysis, and report finding to corrosion database. 	<ol style="list-style-type: none"> Field Manager. Project Manager. Downhole maintenance crew. 	<ol style="list-style-type: none"> The well needs to be repaired and put back on injection within 90 days; request an extension or P&A. 	
Downhole Equipment	Injection Wells	Casing	CO ₂ Corrosion	<ul style="list-style-type: none"> CR13 material selected across CO₂ injection zones. CO₂-resistant cement covering injection zone interval. Injection through packer and tubing. Casing cemented to surface. Continuous Injection. 	<ol style="list-style-type: none"> Electromagnetic logging. Corrosion coupons. Pressure and temperature gauges. DTS fiber technology. Annular pressure test. 	<ol style="list-style-type: none"> Log run through tubing. Installed upstream injection wellhead. Wellhead and on top of the packer. Casing exterior. Surface. 	<ol style="list-style-type: none"> Every 5 years. Quarterly. Real time. Real time. Every 5 years. 	<ul style="list-style-type: none"> Failure detected. High risk assessed by the monitoring technique. 	<p>Stop of Injection is required by permit once the failure is detected.</p> <ol style="list-style-type: none"> Stop Injection. Troubleshoot the well. If loss of mechanical integrity is validated, prepare workover proposal. Inform Commission within 24 hr, and discuss with action plan. Pull tubing and packer. Run casing inspection log. If required, propose casing repair program or P&A and discuss with Commission, based on the findings. Once the casing is repaired, run back completion hydrotesting. Perform annular pressure test. Run CIL log through tubing. Perform falloff test. Perform root cause analysis, and report finding to corrosion database. 	<ol style="list-style-type: none"> Field Manager. Project Manager. Downhole maintenance crew. 	<ol style="list-style-type: none"> The well needs to be repaired and put back on injection within 90 days; request an extension or P&A. 	
Downhole Equipment	Injection Wells	P/T Gauges & Carriers	CO ₂ Corrosion	<ul style="list-style-type: none"> Inconel carriers and quartz gauges. Packer inhibited fluid in the annular in contact with the tools. 	<ol style="list-style-type: none"> Real-time data transfer. Electromagnetic logging. Annular pressure test. 	<ol style="list-style-type: none"> n/a Log run through tubing. Surface test. 	<ol style="list-style-type: none"> Real time. Annually. Annually. 	<ul style="list-style-type: none"> Failure detected. High risk assessed by the monitoring technique. 	<p>Replace or repair tool.</p> <ol style="list-style-type: none"> Stop injection. Perform annular pressure test to identify any loss of mechanical integrity in tubing or casing above injection zone. If the well has integrity, inform Commission within 24 hr, and discuss WO or alternative to replace the gauge or solve the issue. If the Commission approves, continue injection while the remedial action is taken. During well service to repair or replace the gauges and carriers, run casing integrity log and pressure test well, inspect tubing, and change any defective equipment on the completion. Identify root cause of failure to take remedial actions, and record the findings in the corrosion management database. 	<ol style="list-style-type: none"> Field Manager. Project Manager. Downhole maintenance crew. 	<ol style="list-style-type: none"> If the well proves mechanical integrity, discuss time of the repair with the Commission. 	

Downhole Equipment	Injection Wells	Electric Cable	CO ₂ Corrosion	<ul style="list-style-type: none"> * Inconel material * Packer inhibited fluid in the annular in contact with the tools. 	<ul style="list-style-type: none"> * Real-time data transfer. 	n/a	<ul style="list-style-type: none"> * Real time. 	<ul style="list-style-type: none"> * Failure detected. 	Replace or repair tool.	<ol style="list-style-type: none"> 1. Troubleshoot the system. 2. Review monitoring data. 3. If the well has integrity, inform Commission within 24 hr, and discuss WO or alternative to replace cable or acquire data. 4. Prepare plan for replacement or repair of the equipment. 5. Upon Commission approval, continue injection and monitor pressure with surface gauges. 	<ol style="list-style-type: none"> 1. Field Manager. 2. Project Manager. 3. Downhole maintenance crew. 	<ol style="list-style-type: none"> 1. If the well proves mechanical integrity, discuss time of the repair with the Commission.
Downhole Equipment	Injection Wells	Packers	CO ₂ Corrosion	<ul style="list-style-type: none"> * Nickel-plated packers. * Elastomers HNBR (RGD). 	<ol style="list-style-type: none"> 1. Pressure and temperature gauges surface and downhole. 2. DST fiber alongside the casing. 3. Annular pressure test. 	<ol style="list-style-type: none"> 1. Wellhead and downhole. 2. Casing. 3. Surface test. 	<ol style="list-style-type: none"> 1. Real time. 2. Real time. 3. Annually. 	<ul style="list-style-type: none"> * Failure detected. * High risk assessed by the monitoring technique. 	Stop of injection is required by permit once the failure is detected.	<ol style="list-style-type: none"> 1. Stop injection. 2. Troubleshoot the well. 3. If loss of mechanical integrity is validated, prepare workover proposal. 4. Inform Commission within 24 hr, and discuss with action plan. 5. Pull tubing and packer scanning. 6. Run casing inspection log. 7. If well has casing integrity, run back completion hydrotesting. 8. Perform annular pressure test. 9. Run CIL log through tubing. 10. Perform fall-off test. 11. Perform root cause analysis, and report finding to corrosion database. 	<ol style="list-style-type: none"> 1. Field Manager. 2. Project Manager. 3. Downhole maintenance crew. 	<ol style="list-style-type: none"> 1. The well needs to be repaired and put back on injection within 90 days; request an extension or P&A.
Downhole Equipment	Injection Wells	Wellhead	CO ₂ Corrosion Atmospheric Corrosion	<ul style="list-style-type: none"> * Wellhead sections are not in contact with CO₂ or formation fluids. 	<ol style="list-style-type: none"> 1. Preventive maintenance. 2. Visual inspection. 3. Function test. 	<ol style="list-style-type: none"> 1. Surface. 2. Surface. 	<ol style="list-style-type: none"> 1. Quarterly. 2. Weekly. 	<ul style="list-style-type: none"> * Damage detected. 	Replace or repair equipment (potentially the valves)	<ol style="list-style-type: none"> 1. Perform inspection with wellhead provider. 2. Define replacement or repair procedure. 	<ol style="list-style-type: none"> 1. Field Manager. 2. Project Manager. 3. Surface maintenance team. 4. Downhole maintenance team. 	n/a
Downhole Equipment	Injection Wells	Tree	CO ₂ Corrosion Atmospheric Corrosion	<ul style="list-style-type: none"> * FF trim selected in the wellhead. * Dry CO₂ injected, no H₂S in the system. 	<ol style="list-style-type: none"> 1. Preventive maintenance. 2. Visual inspection. 3. Function test. 	Surface.	<ol style="list-style-type: none"> 1. Quarterly. 2. Weekly. 3. By manufacturer recommendation. 	<ul style="list-style-type: none"> * Damage or malfunction detected. 	Stop injection to replace equipment.	<ol style="list-style-type: none"> 1. Stop injection. 2. Perform inspection by wellhead specialist. 3. Define action plan based on findings. 	<ol style="list-style-type: none"> 1. Field Manager. 2. Project Manager. 3. Surface maintenance team. 4. Downhole maintenance team. 	<ol style="list-style-type: none"> 1. To be defined by the procedure and findings.
Downhole Equipment	Injection Wells	Tubing Hanger	CO ₂ Corrosion	<ul style="list-style-type: none"> * FF trim selected in the wellhead * Dry CO₂ injected, no H₂S in the system. 	<ol style="list-style-type: none"> 1. Surface pressure gauges. 	<ol style="list-style-type: none"> 1. Surface. 2. Surface. 	<ol style="list-style-type: none"> 1. Real time. 	<ul style="list-style-type: none"> * Damage or malfunction detected. 	Stop of injection is required by permit once the failure is detected.	<ol style="list-style-type: none"> 1. Stop injection. 2. Troubleshoot the well. 3. If loss of mechanical integrity is validated, prepare workover proposal. Actions will depend on the assessment and troubleshooting. 4. Inform Commission within 24 hr, and discuss with action plan. 5. Execute repair. 6. Perform root cause analysis, and report finding to corrosion database. 	<ol style="list-style-type: none"> 1. Field Manager. 2. Project Manager. 3. Surface maintenance team. 4. Downhole maintenance team. 	<ol style="list-style-type: none"> 1. The well needs to be repaired and put back on injection within 90 days; request an extension or P&A.
Downhole Equipment	Injection Wells	Tapered Long String Hanger	CO ₂ Corrosion	<ul style="list-style-type: none"> * CO₂-resistant cement. * Inhibited packer fluids above tapered long string. * Top packer seal * Continuous injection. * Elastomers HNBR (RGD). 	<ol style="list-style-type: none"> 1. Corrosion coupons. 2. Pressure and temperature gauges. 3. DST fiber technology. 	<ol style="list-style-type: none"> 1. Installed upstream injection wellhead. 2. Wellhead and on top of the packer. 3. Casing exterior. 	<ol style="list-style-type: none"> 1. Quarterly. 2. Real time. 3. Real time. 	<ul style="list-style-type: none"> * Failure detected. * High risk assessed by the monitoring technique. 	Stop of injection is required by permit once the failure is detected.	<ol style="list-style-type: none"> 1. Stop injection. 2. Troubleshoot the well. 3. If loss of mechanical integrity is validated, prepare workover proposal. 4. Inform Commission within 24 hr, and discuss with action plan. 5. Pull tubing and packer. 6. Run casing inspection log. 7. If needed, pressure-test the casing with straddle packers. 8. If damage in the tapered long string hanger is detected, prepare workover proposal, and discuss it with the Commission. 9. Once the tapered long string hanger is required, run back upper completion hydrotesting. 10. Perform annular pressure test. 11. Run CIL log through tubing. 12. Perform fall-off test. 13. Perform root cause analysis, and report 	<ol style="list-style-type: none"> 1. Field Manager. 2. Project Manager. 3. Downhole maintenance crew. 	<ol style="list-style-type: none"> 1. The well needs to be repaired and put back on injection within 90 days; request an extension or P&A.

Downhole Equipment	Monitoring Wells	Tubing, Nipples, X/O	CO ₂ Corrosion	* CR13 metallurgy for tail pipe below/between packers. * inhibited packer fluid.	1. Electromagnetic logging 2. Corrosion coupons. 3. Pressure and temperature gauges. 4. Annular pressure test.	1. Log run through tubing. 2. Installed upstream injection wellhead. 3. Wellhead and on top of the packer. 4. Surface.	1. Annually. 2. Quarterly. 3. Real time. 4. Annually.	* Failure detected. * High risk assessed by the monitoring technique.	* Lost of information for plume monitoring. * Corrosion from formation brines if it's not repaired.	1. Trigger alarm from monitoring system/operator. 2. Troubleshoot the well. 3. If loss of mechanical integrity is validated, prepare workover proposal. 4. Inform Commission within 24 hr, and discuss with action plan. 5. Pull tubing and packer scanning. 6. Run casing inspection log. 7. If well has casing integrity, run back completion hydrotesting. 8. Perform annular pressure test. 9. Run CIL log through tubing. 10. Perform root cause analysis, and report finding to corrosion database.	1. Field Manager. 2. Project Manager. 3. Downhole maintenance crew.	1. The well needs to be repaired and put back within a year; request an extension or P&A.
Downhole Equipment	Monitoring Wells	Casing	CO ₂ Corrosion	* CR13 metallurgy across injection zones. * inhibited packer fluid in annular above injection zones. * Casing cemented to surface. * Isolated monitoring zone with packer across injection targets.	1. Electromagnetic logging. 2. Corrosion coupons. 3. Pressure and temperature gauges. 4. Annular pressure test.	1. Run through tubing. 2. Installed upstream injection wellhead. 3. Surface and downhole. 4. Surface.	1. Annually. 2. Quarterly. 3. Real time. 4. Annually.	* Failure detected. * High risk assessed by the monitoring technique.	* Lost of information for plume monitoring. * Corrosion from formation brines if it's not repaired.	1. Trigger alarm from monitoring system/operator. 2. Troubleshoot the well. 3. If loss of mechanical integrity is validated, prepare workover proposal. 4. Inform Commission within 24 hr, and discuss with action plan. 5. Pull tubing and packer. 6. Run casing inspection log. 7. If required, propose casing repair program or P&A, and discuss with director, based on the findings. 8. Once the casing is repaired, run back completion hydrotesting. 9. Perform annular pressure test. 10. Run CIL log through tubing. 11. Perform root cause analysis and report finding to corrosion database.	1. Field Manager. 2. Project Manager. 3. Downhole maintenance crew.	1. The well needs to be repaired and put back within a year; request an extension or P&A.
Downhole Equipment	Monitoring Wells	P/T Gauges & Carriers	CO ₂ Corrosion	* Inconel carriers and quartz gauges.	1. Real time data transfer. 1. Electromagnetic logging 3. Annular pressure test.	1. N/A 2. Log run through tubing. 3. Surface test.	1. Real time. 2. Annually. 3. Annually.	* Failure detected. * High risk assessed by the monitoring technique.	Replace or repair tool.	1. Trigger alarm from monitoring system/operator. 2. Troubleshoot the well. 3. Perform annular pressure test to identify any loss of mechanical integrity in tubing or casing above packers. 4. If the well has integrity, inform Commission within 24 hr, and discuss W/O or alternative to replace the gauge or acquire the data. 6. During well service to repair or replace the gauges and carriers, run electromagnetic integrity log to verify condition of the casing, replace any packer or equipment damaged, and hydrotest tubing. 7. Identify root cause of failure to take preventive actions, and record findings in the corrosion management database.	1. Field Manager. 2. Project Manager. 3. Downhole maintenance crew.	1. If the well proves mechanical integrity, discuss time of the remediation with the Commission.
Downhole Equipment	Monitoring Wells	Electric Cable	CO ₂ Corrosion	* Inconel material. * Packer inhibited fluid in the annular in contact with the tools.	* Real time data transfer.	N/A	* Real time.	* Failure detected.	Replace or repair tool.	1. Troubleshoot the system. 2. Review monitoring data. 3. If the well has integrity, inform Commission within 24 hr, and discuss W/O or alternative to replace cable or acquire data. 4. Prepare plan for replacement or repair of the equipment. 5. Upon Commission approval, continue injection and monitor pressure with surface gauges.	1. Field Manager. 2. Project Manager. 3. Downhole maintenance crew.	1. If the well proves mechanical integrity, discuss time of the repair with the Commission.

Downhole Equipment	Monitoring Wells	Packers	CO ₂ Corrosion	* Nickel-plated packers. * Elastomers HNBR (NGD).	1. Pressure and temperature gauges surface and downhole. 2. DST fiber alongside the casing. 3. Annular pressure test.	1. Wellhead and downhole. 2. Casing. 3. Surface test.	1. Real time. 2. Real time. 3. Annually.	* Failure detected. * High risk assessed by the monitoring technique.	* Loss of information for plume monitoring. * Corrosion from formation brines if it's not repaired.	1. Stop injection. 2. Troubleshoot the well. 3. If loss of mechanical integrity is validated, prepare workover proposal. 4. If the well has integrity, inform Commission within 24 hr, and discuss WO or alternative to replace the gauge or acquire the data. 5. Pull tubing and packer scanning. 6. Run casing inspection log. 7. If well has casing integrity, run back completion hydrotesting. 8. Perform annular pressure test. 9. Run CIL log through tubing. 10. Perform fall-off test. 11. Perform root cause analysis, and report finding to corrosion database.	1. Field Manager, 2. Project Manager, 3. Downhole maintenance crew.	1. The well needs to be repaired and put back on injection within 1 year; request an extension or P&A.
Downhole Equipment	Monitoring Wells	Wellhead / Tree	CO ₂ Corrosion Atmospheric Corrosion	* Wellhead and tree section are not in contact with CO ₂ or formation fluids.	1. Preventive maintenance. 2. Visual inspection. 3. Function tests.	1. Surface. 2. Surface. 3. Surface.	1. Quarterly. 2. Weekly. 3. By manufacturer recommendation.	* Damage detected.	Replace or repair equipment (potentially the valves).	1. Perform inspection with wellhead provider. 2. Define replacement or repair procedure based on the findings.	1. Field Superintendent, 2. Project Manager, 3. Surface maintenance team.	n/a
CO ₂ Pipeline	CO ₂ Pipeline	API-5L Line Pipe	CO ₂ in the Presence of H ₂ O	Dehydrate the CO ₂ to 630 ppm of H ₂ O (30 #/MMscf).	1. Inspect pig the pipeline every 5 years. 2. Annual cathodic protection potential survey. 3. Monitor cathodic protection recifier monthly. 4. DCVG survey every 5 years (DOT pipeline). 5. Analyze product for H ₂ O levels above 30 lb/MMscf with shut off capabilities prior to entering pipelines. 6. Coupon test station near pipeline inlet.	n/a	1. Every 5 years. 2. Annually. 3. Monthly. 4. Every 5 years. 5. Continuously. 6. Monthly.	* Failure detected. * High risk assessed by the monitoring technique.	Depends on the severity of the finding during examination.	TBD by the severity of the finding on the examination.	Mechanical Integrity (MI) personnel in charge of the pipeline.	TBD by the severity of the finding on the examination.
Surface Piping, Instrumentation, and Pressure Control	Surface Piping, Instrumentation, and Pressure Control	Surface Piping	CO ₂ Corrosion	* CO ₂ dehydrated to 630 ppm H ₂ O injected (30 lb/MMscf). * Selection of materials for CO ₂ service.	1. Corrosion coupons. 2. Monitoring of CO ₂ composition from capture facility.	1. Surface. 2. Capture facility.	1. Quarterly. 2. Real time. 3. Real time.	* Failure detected. * High risk assessed by the monitoring technique.	Depends on the severity of the finding during examination; noncritical instrumentation may be isolated and replaced online; critical instruments and valves will require shutdown.	Replacement of piping segment, depending on severity of examination.	MI personnel in charge of the surface facility.	TBD by the severity of the finding on the examination.
Surface Piping, Instrumentation, and Pressure Control	Surface Piping, Instrumentation, and Pressure Control	Valves	CO ₂ Corrosion	* CO ₂ dehydrated to 630 ppm H ₂ O injected (30 lb/MMscf). * Selection of materials for CO ₂ service.	1. Corrosion coupons. 2. Monitoring of CO ₂ composition from capture facility.	1. Surface. 2. Capture facility.	1. Quarterly. 2. Real time. 3. Real time.	* Failure detected. * High risk assessed by the monitoring technique.	Depends on the severity of the finding during examination; noncritical instrumentation may be isolated and replaced online; critical instruments and valves will require shutdown.	Replacement of valve, depending on severity of examination.	MI personnel in charge of the surface facility.	TBD by the severity of the finding on the examination and criticality of valve.
Surface Piping, Instrumentation, and Pressure Control	Surface Piping, Instrumentation, and Pressure Control	Instrumentation	CO ₂ Corrosion	* CO ₂ dehydrated to 630 ppm H ₂ O injected (30 lb/MMscf). * Selection of materials for CO ₂ service.	1. Corrosion coupons. 2. Monitoring of CO ₂ composition from capture facility. 3. Visual inspection.	1. Surface. 2. Capture facility. 3. Surface.	1. Quarterly. 2. Real time. 3. Weekly site visits.	* Failure detected. * High risk assessed by the monitoring technique.	Depends on the severity of the finding during examination; noncritical instrumentation may be isolated and replaced online; critical instruments and valves will require shutdown.	Replacement of instrumentation, depending on severity of examination.	MI personnel in charge of the surface facility.	TBD by the severity of the finding on the examination and criticality of the instrument.
Surface Piping, Instrumentation, and Pressure Control	Surface Piping, Instrumentation, and Pressure Control	Injection Pressure Gauge	CO ₂ Corrosion	* CO ₂ dehydrated to 630 ppm H ₂ O injected (30 lb/MMscf). * Selection of materials for CO ₂ service.	1. Corrosion coupons. 2. Monitoring of CO ₂ composition from capture facility. 3. Visual inspection.	1. Surface. 2. Capture facility. 3. Surface.	1. Quarterly. 2. Real time. 3. Weekly site visits.	* Failure detected. * High risk assessed by the monitoring technique.	Depends on the severity of the finding during examination; critical instruments and valves will require shutdown.	Replacement of instrumentation, depending on severity of examination.	MI personnel in charge of the surface facility.	Immediate action required to maintain compliance. Pressure must be monitored during injection.
Surface Piping, Instrumentation, and Pressure Control	Surface Piping, Instrumentation, and Pressure Control	Injection Rate Meter	CO ₂ Corrosion	* CO ₂ dehydrated to 630 ppm H ₂ O injected (30 lb/MMscf). * Selection of materials for CO ₂ service.	1. Corrosion coupons. 2. Monitoring of CO ₂ composition from capture facility. 3. Visual inspection of orifice plate using sensor fittings.	1. Surface. 2. Capture facility. 3. Surface.	1. Quarterly. 2. Real time. 3. Quarterly.	* Failure detected. * High risk assessed by the monitoring technique.	Depends on the severity of the finding during examination; critical instruments and valves will require shutdown.	Replacement of instrumentation, depending on severity of examination.	MI personnel in charge of the surface facility.	Immediate action required to maintain compliance. Rate must be monitored during injection.
Surface Piping, Instrumentation, and Pressure Control	Surface Piping, Instrumentation, and Pressure Control	Injection Temperature Gauge	CO ₂ Corrosion	* CO ₂ dehydrated to 630 ppm H ₂ O injected (30 lb/MMscf). * Selection of materials for CO ₂ service.	1. Corrosion coupons. 2. Monitoring of CO ₂ composition from capture facility. 3. Visual inspection.	1. Surface. 2. Capture facility. 3. Surface.	1. Quarterly. 2. Real time. 3. Weekly site visits.	* Failure detected. * High risk assessed by the monitoring technique.	Depends on the severity of the finding during examination; critical instruments and valves will require shutdown.	Replacement of instrumentation, depending on severity of examination.	MI personnel in charge of the surface facility.	Immediate action required to maintain compliance. Temperature must be monitored during injection.

Surface Piping, Instrumentation, and Pressure Control	Surface Piping, Instrumentation, and Pressure Control	Emergency Shutdown Valve	CO ₂ Corrosion	*CO ₂ dehydrated to 630 ppm H ₂ O injected (30 lb/MMscf). *Selection of materials for CO ₂ service.	1. Corrosion coupons. 2. Monitoring of CO ₂ composition from capture facility. 3. Testing of valve integrity.	1. Surface. 2. Capture facility. 3. Surface.	1. Quarterly. 2. Real time. 3. By manufacturer recommendation.	* Failure detected. * High risk assessed by the monitoring technique.	Depends on the severity of the finding during examination; critical instruments and valves will require shutdown.	Replacement of valve, depending on severity of examination.	MI personnel in charge of the surface facility.	Immediate action required to maintain compliance. Shutoff capability must be maintained during injection.
Surface Piping, Instrumentation, and Pressure Control	Surface Piping, Instrumentation, and Pressure Control	Surface Piping	Corrosion under Insulation (CUI)	*External painting.	1. Visual Inspection.	1. Surface.	1. Site visits/expected weekly activity.	* Failure detected.	n/a	Repainting and replacement of insulation.	MI personnel in charge of the surface facility.	TBD by the severity of the finding on the examination.
Surface Piping, Instrumentation, and Pressure Control	Surface Piping, Instrumentation, and Pressure Control	Valves	CUI	*External painting.	1. Visual Inspection.	1. Surface.	1. Site visits/expected weekly activity.	* Failure detected.	n/a	Repainting and replacement of insulation.	MI personnel in charge of the surface facility.	TBD by the severity of the finding on the examination and criticality of valve.
Surface Piping, Instrumentation, and Pressure Control	Surface Piping, Instrumentation, and Pressure Control	Instrumentation	CUI	*Stainless steel materials.	1. Visual Inspection.	1. Surface.	1. Site visits/expected weekly activity.	* Failure detected.	n/a	Repainting and replacement of insulation.	MI personnel in charge of the surface facility.	TBD by the severity of the finding on the examination and criticality of instrument.
Surface Piping, Instrumentation, and Pressure Control	Surface Piping, Instrumentation, and Pressure Control	Injection Pressure Gauge	CUI	*Stainless steel materials.	1. Visual Inspection.	1. Surface.	1. Site visits/expected weekly activity.	* Failure detected.	n/a	Repainting and replacement of insulation.	MI personnel in charge of the surface facility.	Immediate action required to maintain compliance. Pressure must be monitored during injection.
Surface Piping, Instrumentation, and Pressure Control	Surface Piping, Instrumentation, and Pressure Control	Injection Rate Meter	CUI	*External painting.	1. Visual Inspection.	1. Surface.	1. Site visits/expected weekly activity.	* Failure detected.	n/a	Repainting and replacement of insulation.	MI personnel in charge of the surface facility.	Immediate action required to maintain compliance. Rate must be monitored during injection.
Surface Piping, Instrumentation, and Pressure Control	Surface Piping, Instrumentation, and Pressure Control	Injection Temperature Gauge	CUI	*Stainless steel materials.	1. Visual Inspection.	1. Surface.	1. Site visits/expected weekly activity.	* Failure detected.	n/a	Repainting and replacement of insulation.	MI personnel in charge of the surface facility.	Immediate action required to maintain compliance. Temperature must be monitored during injection.
Surface Piping, Instrumentation, and Pressure Control	Surface Piping, Instrumentation, and Pressure Control	Emergency Shutdown Valve	CUI	* External painting.	1. Visual Inspection.	1. Surface.	1. Site visits/expected weekly activity.	* Failure detected.	n/a	Repainting and replacement of insulation.	MI personnel in charge of the surface facility.	Immediate action required to maintain compliance. Shutoff capability must be maintained during injection.
Surface Piping, Instrumentation, and Pressure Control	Surface Piping, Instrumentation, and Pressure Control	Surface Piping	Brittle Fracture	*Insulation/heat tracing to provide cold-weather protection. *Building/structure.	1. Visual Inspection. 2. Monitoring heat tracing and maintenance per vendor requirements.	1. Surface 2. Surface	1. Site visits/expected weekly activity 2. Per vendor requirements.	* Failure detected. * High risk assessed by the monitoring technique.	Depends on the severity of the finding during examination; shutdown may be required.	Replacement or repair of insulation/heat tracing. Potential replacement of piping depending on results of inspection.	MI personnel in charge of the surface facility.	TBD by the severity of the finding on the examination.
Surface Piping, Instrumentation, and Pressure Control	Surface Piping, Instrumentation, and Pressure Control	Valves	Brittle Fracture	*Insulation/heat tracing to provide cold-weather protection. *Building/structure.	1. Visual Inspection. 2. Monitoring heat tracing and maintenance per vendor requirements.	1. Surface 2. Surface	1. Site visits/expected weekly activity 2. Per vendor requirements.	* Failure detected. * High risk assessed by the monitoring technique.	Depends on the severity of the finding during examination; shutdown may be required.	Replacement or repair of insulation/heat tracing. Potential replacement of valve(s) depending on results of inspection.	MI personnel in charge of the surface facility.	TBD by the severity of the finding on the examination and criticality of valve.
Surface Piping, Instrumentation, and Pressure Control	Surface Piping, Instrumentation, and Pressure Control	Instrumentation	Brittle Fracture	*Insulation/heat tracing to provide cold-weather protection. *Building/structure.	1. Visual Inspection. 2. Monitoring heat tracing and maintenance per vendor requirements.	1. Surface 2. Surface	1. Site visits/expected weekly activity 2. Per vendor requirements.	* Failure detected. * High risk assessed by the monitoring technique.	Depends on the severity of the finding during examination; shutdown may be required.	Replacement or repair of insulation/heat tracing. Potential replacement of instrumentation depending on results of inspection.	MI personnel in charge of the surface facility.	TBD by the severity of the finding on the examination and criticality of instrument.
Surface Piping, Instrumentation, and Pressure Control	Surface Piping, Instrumentation, and Pressure Control	Injection Pressure Gauge	Brittle Fracture	*Insulation/heat tracing to provide cold-weather protection. *Building/structure.	1. Visual Inspection. 2. Monitoring heat tracing and maintenance per vendor requirements.	1. Surface 2. Surface.	1. Site visits/expected weekly activity 2. Per vendor requirements.	* Failure detected. * High risk assessed by the monitoring technique.	Depends on the severity of the finding during examination; shutdown may be required.	Replacement or repair of insulation/heat tracing. Potential replacement of instrumentation depending on results of inspection.	MI personnel in charge of the surface facility.	Immediate action required to maintain compliance. Pressure must be monitored during injection.
Surface Piping, Instrumentation, and Pressure Control	Surface Piping, Instrumentation, and Pressure Control	Injection Rate Meter	Brittle Fracture	*Insulation/heat tracing to provide cold-weather protection. *Building/structure.	1. Visual Inspection. 2. Monitoring heat tracing and maintenance per vendor requirements.	1. Surface 2. Surface.	1. Site visits/expected weekly activity 2. Per vendor requirements.	* Failure detected. * High risk assessed by the monitoring technique.	Depends on the severity of the finding during examination; shutdown may be required.	Replacement or repair of insulation/heat tracing. Potential replacement of instrumentation depending on results of inspection.	MI personnel in charge of the surface facility.	Immediate action required to maintain compliance. Rate must be monitored during injection.

Surface Piping, Instrumentation, and Pressure Control	Surface Piping, Instrumentation, and Pressure Control	Injection Temperature Gauge	Brittle Fracture	*Insulation/heat tracing to provide cold-weather protection. *Building/structure.	1. Visual inspection. 2. Monitoring heat tracing and maintenance per vendor requirements.	1. Surface. 2. Surface.	1. Site visits/expected weekly activity. 2. Per vendor requirements.	* Failure detected. * High risk assessed by the monitoring technique.	Depends on the severity of the finding during examination; shutdown may be required.	Replacement or repair of insulation/heat tracing. Potential replacement of instrumentation depending on results of inspection.	All personnel in charge of the surface facility.	Immediate action required to maintain compliance. Temperature must be monitored during injection.
Surface Piping, Instrumentation, and Pressure Control	Surface Piping, Instrumentation, and Pressure Control	Emergency Shutdown Valve	Brittle Fracture	*Insulation/heat tracing to provide cold-weather protection. *Building/structure.	1. Visual inspection. 2. Monitoring heat tracing and maintenance per vendor requirements.		1. Site visits/expected weekly activity. 2. Per vendor requirements.	* Failure detected. * High risk assessed by the monitoring technique.	Depends on the severity of the finding during examination; shutdown may be required.	Replacement or repair of insulation/heat tracing. Potential replacement of valve depending on results of inspection.	All personnel in charge of the surface facility.	Immediate action required to maintain compliance. Shut-off capability must be maintained during injection.



Fluid Specifications

1. CO₂ Spec

Stream Description	Compressed CO ₂ Product to Battery Limits
Stream Number	606
Temperature, °F	120
Pressure, psia	1688.7
Components	
Component Flows	Limits
H ₂ O	632 ppmv
CO ₂	99.90%
N ₂	163 ppmv
Ar	4 ppmv
O ₂	6 ppmv
H ₂	0%
SO ₂	<1 ppmv
NO ₂	< 1ppmv
NO	30 ppmv

APPENDIX G

**FINANCIAL ASSURANCE DEMONSTRATION
PLAN**

**Tundra Secure Geologic Storage Site
Financial Assurance Plan
Details of Financial Instruments Provided in Conjunction with Application**

SPECIAL-PURPOSE TRUST

This section describes the selection of a trustee for the Tundra SGS Trust Fund, the Trust Agreement, and the financial strength of the trustee. The trust fund will be established prior to first injection and will be designed to meet the requirements of NDAC § 43-05-01-09.1.

The trust fund will be available for emergency and remedial response upon approval of the Class VI permits and, after injection ceases, for injection well plugging, postinjection site care, and site closure. The trust funds will be available to the Applicant or to a third party if the Applicant were no longer involved with Tundra SGS site operation.

Applicant sent request to three local, regional, and national banks seeking a statement of qualifications for the management of an irrevocable trust to meet Tundra SGS obligations for injection well plugging and postinjection site care and site closure. The Applicant provided the trustee requirements and specifications that prospective trustees must meet and provided the draft Trust Agreement attached hereto as Appendix G-1. Expressions of interest were due to Applicant February 15, 2021.

On March 8, 2021, the Applicant sent a formal Request for Proposal to two banks that had expressed interest in serving as the trustee for the Tundra SGS Trust Fund. Applicant selected Bank of North Dakota (BND) based upon its experience, expertise, and overall approach and responsiveness.

BND provides corporate trust services for the state of North Dakota and its political subdivisions. Services include trustee, escrow agent, paying agent, bond registrar, and transfer agent. BND monitors compliance with financing documents, oversees reporting requirements, invests fund balance, receives and disburses funds, reconciles accounts, and maintains proper records. BND will provide monthly transaction and balance sheet reports, and annual valuations of the account will be completed.

BND has a Compliance Officer who monitors regulations and assists with implementation of new requirements. In addition, Internal Audit staff provide periodic reviews of the Trust Services to ensure adherence to policies and procedures.

Strength of the Trustee

BND maintains a Standard & Poor's long-term A+ and short-term A-1 credit rating. The Trust department currently has over \$2 billion under management.

Trust Agreement

The trust fund will be funded in a phased approach to account for the fact that certain covered activities will not be incurred until shortly before authorization of operation is received. For example, resources to cover the cost of activities like emergency remedial response and

postinjection site care will not need to be covered until closer to when injection begins. The Applicant is providing financial responsibility for the cost of plugging injection wells, postinjection site care, site closure, and emergency and remedial response via a trust fund valued at \$19,824,000.00 and established through the attached Trust Agreement which BND has expressed willingness to accept all recommended terms.

Payment Schedule

The payment schedule for Trust funds commences upon approval of the Class VI permit to operate. Commercial insurance will be bound upon approval of drilling contractor for injection wellbores and is not included in this section.

Initial funding for Trust, in the amount of \$2.12 million, representing potential exposure for emergency and remedial response actions, shall be placed into the Trust upon approval of the Class VI permit to operate.

Subsequent funding of the Trust, in the amount of \$17.704 million, representing obligations for injection well plugging and postinjection site care and site closure, shall be placed into the Trust in equal installments over a period of seven (7) years commencing on the anniversary of the date of first injection.

Pay-In Periods

The following table provides the pay-in periods for the funding of the Trust. Amounts after initial pay-in are subject to annual review and reporting for continuing validation of estimated costs and underlying assumptions.

Funding	Activities	Costs (\$000)	Amount to Be Added Before End of Phase (\$000)
Preinjection (within 7 days of operating permit issuance)	Emergency and Remedial Response	\$5,960	\$2,120
	AOR and Corrective Action	\$0	
Injection (seven (7) equal installments at least 7 days prior to successive anniversaries of operating permit issuance)	Plugging Injection and Monitoring Wells	\$2,025	\$17,704
	Emergency and Remedial Response	\$3,840	
	Postinjection Site Care (includes monitoring)	\$10,285	
	Closure	\$1,554	
		Total Fund	\$19,824

COMMERCIAL INSURANCE

This section describes the manner in which the Applicant will select a third-party insurer, develop an insurance estimate, obtain proof of insurance, and confirm the financial strength of the insurer.

The Applicant has procured the services of Marsh McLennan Companies.

The Applicant intends to secure third-party insurance to cover the potential need to undertake emergency and remedial response actions to protect USDWs in the AOR. Although the Applicant has been able to obtain information about the possible terms, conditions, and cost of such a policy, the Applicant has not yet applied for such a policy. This section and accompanying market assessment describe the type of coverage that the Applicant expects to obtain from a third-party insurer, including protective conditions of coverage (cancellation, renewal, and continuation provisions). Additional information about deductions, exceptions, and the premium to be paid is also provided in the attached Appendix G-2 Market Assessment.

Coverage Limits

The greatest exposure would be an acute upward migration through the CO₂ injection well, which would have an estimated cost of \$16,560,000.00 for emergency and remedial response actions, and such coverage would be an amount sufficient to cover the amounts identified in the endangerment of USDWs. The coverage limit will not be lower than the estimated amount to be covered by Commercial Insurance, \$10,600,000.00, as found in Section 4.0, Table 4-14, and may be acquired at a higher limit based upon assessment of available insurance products and market capacity.

Premium

These are only estimates; the premium will be determined based on information provided to the underwriter prior to a cost quotation.

Proof of Insurance

Proof of insurance will be provided when the insurance policy is obtained, prior to first injection.

Financial Strength of Insurer

The financial strength of the insurer will be an important component of the Applicant's selection of an insurer. Information regarding the insurer's financial strength will be provided to the Commission when the insurer is selected.

APPENDIX G-1
STANDBY TRUST AGREEMENT

APPENDIX G-1
STANDBY TRUST AGREEMENT

THIS TRUST AGREEMENT (the "Agreement") is entered into as of _____ by and between Minnkota Power Cooperative, Inc. (MPC), owner or operator, a corporation (the "Grantor"), and Bank of North Dakota (the "Trustee"), a bank duly organized and existing under the laws of the State of North Dakota.

WHEREAS, the North Dakota Industrial Commission (Commission), an agency of the State of North Dakota, has established authority to administer certain regulations pursuant to the US Environmental Protection Agency's Class VI Underground Injection Control Program (UIC). The Commission's regulations, applicable to the Grantor, require that an owner or operator of an injection well shall provide assurance that funds will be available when needed for corrective actions, injection well plugging, post-injection site care and site closure, and emergency and remedial response during the operation of carbon dioxide (CO₂) geologic sequestration injection wells;

WHEREAS, the Grantor has elected to establish a trust to provide all or part of such financial assurance for the facility or facilities identified herein, and;

WHEREAS, the Grantor, acting through its duly authorized officers, has selected the Trustee to be the trustee under this Agreement, and the Trustee is willing to act as trustee.

NOW THEREFORE, the Grantor and the Trustee agree as follows:

Section 1. Definitions. As used in this Agreement:

- A. The term "Grantor" means the owner or operator who enters into this Agreement and any successors or assigns of the Grantor.
- B. The term "Trustee" means the Trustee who enters into this Agreement and any successor Trustee.
- C. Facility or activity means any "underground injection well" or any other facility or activity that is subject to regulation under the Underground Injection Control Program.
- D. "Commission" means the North Dakota Industrial Commission or an authorized representative.
- E. "ERR" means emergency and remedial response plan, associated cost estimate and the funded trust property and income apportioned to cover these costs.

Section 2. Identification of Facilities and Cost Estimates. This Agreement pertains to the facilities and cost estimates identified on attached Schedule A.

Section 3. Establishment of Fund. The Grantor and the Trustee hereby establish a CO₂ Storage Trust Fund (the "Fund") to satisfy the financial responsibility demonstration and storage facility fees under the Class VI Underground Injection Control ("UIC") regulations (N.D.A.C. § 43-05-01-09.1 and N.D.A.C. § 43-05-01-17). This Fund shall remain dormant until funded with the proceeds listed on Schedule C. The Trustee shall have no duties or responsibilities beyond safekeeping this Agreement. Upon funding, this Fund shall become active and be administered

pursuant to the terms of this instrument. The Grantor and the Trustee acknowledge that the purpose of the Fund is to fulfill the Grantor's corrective action, injection well plugging, post-injection site care, site closure, emergency and remedial response, and storage facility fee obligations described at N.D.A.C. § 43-05-01-05.1 (Area of review and corrective action), N.D.A.C. § 43-05-01-11.5 (Injection well plugging), N.D.A.C. § 43-05-01-19 (Post-injection site care and site closure), N.D.A.C. § 43-05-01-13 (Emergency and remedial response), and N.D.A.C. § 43-05-01-17 (Storage Facility Fees) respectively. All expenditures from the Fund shall be to fulfill the legal obligations of the Grantor under such regulations, and not any obligation of the Commission or any other state agency. The Grantor and the Trustee intend that no third party have access to the Fund except as herein provided. The Fund is established initially as consisting of the property, which is acceptable to the Trustee, described in Schedule B attached hereto. Such property and any other property subsequently transferred to the Trustee is referred to as the Fund, together with all earnings and profits thereon, less any payments or distributions made by the Trustee pursuant to this Agreement. The Fund shall be held by the Trustee, IN TRUST, as hereinafter provided. The Trustee shall not be responsible, nor shall it undertake any responsibility, for the amount or adequacy of any additional payments necessary to discharge any liabilities of the Grantor established by the Commission.

Section 4. Payment for Corrective Action, Injection Well Plugging, Post-Injection Site Care and Site Closure, and Emergency and Remedial Response. The Trustee shall make payments from the Fund only as the Commission shall direct, in writing, to provide for the payment of the costs of corrective action, injection well plugging, post-injection site care and site closure, and emergency and remedial response of the injection wells covered by this Agreement. The Trustee shall use the Fund to direct-pay or reimburse the Grantor, other persons selected by the Grantor to perform work, or as otherwise directed by the Commission when the Commission advises in writing that the work will be or was necessary for the fulfillment of the Grantor's corrective action, injection well plugging, post-injection site care and site closure, or emergency and remedial response obligations described in N.D.A.C. §§ 43-05-01-05.1, 43-05-01-11.5, 43-05-01-19 and 43-05-01-13, respectively. All expenditures from the Fund shall be to fulfill the legal obligations of the Grantor under such regulations, and not any obligation of the Commission, as the Commission is not a beneficiary of the Trust. The Commission may advise the Trustee that amounts in the Fund are no longer necessary to fulfill the Grantor's obligations under N.D.A.C. § 43-05-01-09.1 and that the Trustee may refund all or a portion of the remaining funds to the Grantor. Upon refund, such funds shall no longer constitute part of the Fund as defined herein.

Section 5. Payments Comprising the Fund. Payments made to the Trustee for the Fund shall consist of cash or securities acceptable to the Trustee. Schedule C provides the amounts and timing of the seven (7) payments (i.e., the pay-in schedule).

Section 6. Trustee Management and Investment. Trustee shall manage, invest, and reinvest all of the Trust assets, made up of the principal and income of the Fund, in accordance with the North Dakota Prudent Investor Standards, Chapter 59-17, *et seq.* of the North Dakota Century Code, as amended ("Act"). The Trustee shall invest and reinvest the principal and income, without distinction, according to the investment instructions included within the attached Exhibit B (referred to as "Permitted Investments"), *provided* the Permitted Investments may be revised at any time upon notice from the Grantor. To the extent not inconsistent with the Act and Permitted

Investments, Trustee shall hold the Fund assets thereon subject to the terms and conditions of this Agreement and is empowered and directed to invest and reinvest the Fund assets and any accumulated income in such certificates of deposit, obligations to the United States of America, demand deposits, commercial paper or other securities or accounts as the Grantor shall direct. In the absence of instructions from the Grantor, Trustee shall invest and reinvest the Fund assets in money market funds available upon demand or short notice. All interest earned on the Fund principal shall become part of the Fund assets. Notwithstanding the foregoing, none of the Fund assets may be held in any investment that cannot be sold, redeemed or otherwise liquidated at the holders' option in ninety (90) days or less without loss of interest or discount. All amounts and investments (other than bearer instruments) comprising the Fund assets shall be registered and held in the name of the Trustee.

Section 7. Express Powers of Trustee. Without in any way limiting the powers and discretions conferred upon the Trustee by the other provisions of this Agreement or by law, the Trustee is expressly authorized and empowered:

- A. To sell, exchange, convey, transfer, or otherwise dispose of any property held by it, by public or private sale. No person dealing with the Trustee shall be bound to see to the application of the purchase money or to inquire into the validity or expediency of any such sale or other disposition;
- B. To make, execute, acknowledge, and deliver any and all documents of transfer and conveyance and any and all other instruments that may be necessary or appropriate to carry out the powers herein granted;
- C. To register any securities held in the Fund in its own name or in the name of a nominee and to hold any security in bearer form or in book entry, or to combine certificates representing such securities with certificates of the same issue held by the Trustee in other fiduciary capacities, or to deposit or arrange for the deposit of such securities in a qualified central depository even though, when so deposited, such securities may be merged and held in bulk in the name of the nominee of such depository with other securities deposited therein by another person, or to deposit or arrange for the deposit of any securities issued by the United States Government, or any agency or instrumentality thereof, with a Federal Reserve bank, but the books and records of the Trustee shall at all times show that all such securities are part of the Fund;
- D. To deposit any cash in the Fund in interest-bearing accounts maintained or savings certificates issued by the Trustee, in its separate corporate capacity, or in any other banking institution affiliated with the Trustee, to the extent insured by an agency of the Federal or State government; and,
- E. To compromise or otherwise adjust all claims in favor of or against the Fund, including claims in favor of the Trust as a loss payee under applicable insurance policies.

Section 8. Taxes and Expenses. All taxes of any kind that may be assessed or levied against or in respect of the Fund and all brokerage commissions incurred by the Fund shall be paid from the Fund. All other expenses incurred by the Trustee in connection with the administration of this Trust, including fees for legal services rendered to the Trustee, the compensation of the Trustee to the extent not paid directly by the Grantor, and all other charges and disbursements of the Trustee permitted under this Agreement shall be paid from the Fund.

Section 9. Annual Valuation. The Trustee shall annually, at least 30 days prior to the anniversary date of establishment of the Fund, furnish to the Grantor and to the Commission a statement confirming the value of the Fund. Any securities in the Fund shall be valued at market value as of no more than 60 days prior to the anniversary date of establishment of the Fund.

Section 10. Advice of Counsel. The Trustee may from time to time consult with counsel, who may be counsel to the Grantor, with respect to any question arising as to the construction of this Agreement or any action to be taken hereunder. The Trustee shall be fully protected, to the extent permitted by law, in acting upon the advice of counsel.

Section 11. Trustee Compensation. Trustee shall be entitled to reasonable compensation for its services provided hereunder in accordance with the Trustee's fee schedule as in effect during the course of this Agreement, *provided* that any change or revision to the fee schedule shall be effective only upon Trustee providing Grantor with thirty (30) days written notice, or another mutually agreed to period of time, which notice shall include effective date(s) of any change or revision. Trustee's current fee schedule is attached as Exhibit C, with such fees identified therein being each and together "Trustee Fees." Additionally, Trustee shall be reimbursed for all expenses reasonably incurred by Trustee in connection with the performance of its duties and enforcement of its rights hereunder and otherwise in connection with the preparation, operation, administration and enforcement of this Agreement, including, without limitation, attorneys' fees, brokerage costs and related expenses incurred by Trustee ("Trustee Expenses"). Grantor shall pay the Trustee Fees and Trust Expenses within thirty (30) days following receipt of an invoice from Trustee.

Section 12. Successor Trustee. The Trustee may resign or the Grantor may replace the Trustee, but such resignation or replacement shall not be effective until the Grantor has appointed a successor trustee and this successor accepts the appointment, and the Commission consents to the appointment. The successor trustee shall have the same powers and duties as those conferred upon the Trustee hereunder. Upon the successor trustee's acceptance and receipt of Commission consent of the appointment, the Trustee shall assign, transfer, and pay over to the successor trustee the funds and properties then constituting the Fund. If for any reason the Grantor cannot or does not act in the event of the resignation of the Trustee, the Trustee may apply to a court of competent jurisdiction for the appointment of a successor trustee or for instructions. The successor trustee shall specify the date on which it assumes administration of the trust in a writing sent to the Grantor, the Commission, and the present Trustee by certified mail ten (10) days before such change becomes effective. Any expenses incurred by the Trustee as a result of any of the acts contemplated by this Section shall be paid as provided in Section 9.

Section 13. Instructions to the Trustee. All orders, requests, and instructions by the Grantor to the Trustee shall be in writing, signed by such persons as are designated in the attached Exhibit A or such other designees as the Grantor may designate by amendment to Exhibit A. The Trustee shall be fully protected in acting without inquiry in accordance with the Grantor's orders, requests, and instructions. All orders, requests, and instructions by the Commission to the Trustee shall be in writing, signed by the Commission or its duly constituted delegate(s), and the Trustee may rely on these instructions to the extent permissible by law. The Trustee shall have the right to assume, in the absence of written notice to the contrary, that no event constituting a change or a termination of the authority of any person to act on behalf of the Grantor or Commission hereunder has

occurred. The Trustee shall have no duty to act in the absence of such orders, requests, and instructions from the Grantor and/or the Commission, except as provided for herein.

Section 14. Notice of Nonpayment. The Trustee shall notify the Grantor and the Commission, by certified mail within ten (10) days following the expiration of the 30-day period after the anniversary of the establishment of the Trust, if no payment is received from the Grantor during that period.

Section 15. Amendment of Agreement. This Agreement may be amended by an instrument in writing executed by the Grantor and the Trustee, with the concurrence of the Commission, or by the Trustee and the Commission if the Grantor ceases to exist. Provided, however, that the Commission may not be named as a beneficiary of the Trust, receive funds from the Trust, or direct that Trust funds be paid to a particular entity selected by the Commission.

Section 16. Cancellation, Irrevocability and Termination. Subject to the right of the parties to amend this Agreement as provided in Section 16, this Trust shall be irrevocable and shall continue until terminated at the written agreement of the Grantor and the Trustee, with the concurrence of the Commission, or by the Trustee and the Commission if the Grantor ceases to exist. Upon termination of the Trust, all remaining Fund property, less final trust administration expenses, and excluding the principal and income contained in the ERR fund account, shall be delivered to the Grantor, or if the Grantor is no longer in existence, at the written direction of the Commission. At termination of the Trust or upon early written direction by the Grantor, with concurrence of the Commission, Trustee must distribute ERR principal in an amount calculated in accordance with N.D.A.C. § 43-05-01-17 plus a pro rata portion of the income accrued. Following the distribution of the ERR principal and income in accordance with the foregoing clause, any remaining Fund property shall be delivered to the Grantor, or if the Grantor is no longer in existence, at the written direction of the Commission.

Section 17. Immunity and Indemnification. The Trustee shall not incur personal liability of any nature in connection with any act or omission, made in good faith, in the administration of this Trust, or in carrying out any directions by the Grantor issued in accordance with this Agreement. The Trustee shall be indemnified and saved harmless by the Grantor or from the Fund, or both, from and against any personal liability to which the Trustee may be subjected by reason of any act or conduct in its official capacity, including all expenses reasonably incurred in its defense in the event the Grantor fails to provide such defense. The Commission does not indemnify either the Grantor or the Trustee. Rather, any claims against the Commission are subject to Chapter 32-12.2, *et seq.*

Section 18. Choice of Law. This Agreement shall be administered, construed, and enforced according to the laws of the State of North Dakota with regard to claims by the Grantor or Trustee. Claims involving the Commission are subject to North Dakota State law.

Section 19. Interpretation. As used in this Agreement, words in the singular include the plural and words in the plural include the singular. The descriptive headings for each Section of this Agreement shall not affect the interpretation or the legal efficacy of this Agreement.

{Signature Page to Follow}

IN WITNESS WHEREOF the parties below have caused this Agreement to be executed by their respective representatives duly authorized and their seals to be hereunto affixed and attested as of the date first above written.

Signature of Grantor's Authorized Representative: _____
Name of Grantor's Authorized Representative: _____
Title: _____

Attest:

Signature: _____
Name of Attester: _____
Title of Attester: _____

Certification of Acknowledgement of Notary:

Signature of Trustee's Authorized Representative: _____
Name of Trustee's Authorized Representative: _____
Title: _____

Attest:

Signature: _____
Name of Attester: _____
Title of Attester: _____

Certification of Acknowledgement of Notary:

Schedule A: Facilities and Cost Estimates to which the Trust Agreement Applies

Because the three injection wells covered by this Agreement will be similarly constructed and drilled from a single well pad and under a combined project plan, the CO₂ injected through the three wells will form one co-mingled and overlapping, stacked CO₂ plume in a contractual and legal context. Therefore, funds noted in the table below apply to all three injection wells as one integrated facility.

Facility	Corrective Action (\$)	Injection Well Plugging (\$)	Post-injection Site Care (\$)	Site Closure (\$)	Emergency and Remedial Response (\$)
Unity-2 (BC-2)	\$0.00	\$2,025,000.00	\$10,285,000.00	\$1,554,000.00	\$5,960,000.00
Liberty-1 (BC-1)					
McCall-3 (DW-1)					
NRDT(Monitoring Well)					

Schedule B: Trust Fund Property

Because the three injection wells covered by this Agreement will be similarly constructed and drilled from a single well pad and under a combined project plan, the CO₂ injected through the three wells will form one co-mingled and overlapping, stacked CO₂ plume in a contractual and legal context. Therefore, funds noted in the table below apply to all three injection wells as one integrated facility.

Facility	Funding Value for Activities
Unity-2 (BC-2)	\$19,824,000.00
Liberty-1 (BC-1)	
McCall-3 (DW-1)	
NRDT(Monitoring Well)	

Schedule C: Pay-in Periods/Schedule

The Fund will be funded according to when the financial risks are incurred in three (3) distinct Periods of activity.

- **Pre-Injection:** Upon authorization from the Commission to begin injecting CO₂ under the Class VI well permit(s), Grantor must be prepared to undertake any emergency or remedial response (ERR) actions, although such actions are unlikely to be needed. Further, in accordance with N.D.C.C. § 43-05-01-17 Grantor must account for a one cent fee on each metric ton of carbon dioxide for administration of a storage facility fund and a fee of seven cents on each ton of carbon dioxide injected for a storage facility fund which can be utilized for post closure period activities (together referred to as “Commission Fee”). The average projected amount of carbon dioxide injected will be 4MM metric tons annually. The Grantor estimates a minimum of 12 years of operation and is permitting operation of the storage facility for 20 years of injection. Grantor’s estimated total cost of ERR activities is \$16,560,000.00 assuming conditions allowing a conservative outer-limit cost estimate (at least 10 years of operation) with \$5,960,000.00 of the estimate funded by the trust. Grantor shall initially fund an amount equal to the net of the cost estimate for ERR activities less the calculated 12 year Commission Fee based upon the projected annual average injection rate of 4MM metric tons, \$2,120,000.00. The initial funding payment in the amount of \$2,120,000.00 will fund the Fund account in the Pre-Injection Period with the remaining equal installments made in the Injection Period, as further discussed below.

- **Injection:**
 - Once an injection or monitoring well is drilled, plugging costs will need to be incurred prior to cessation of injection operations. Therefore, the trust account will need to account for the cost of plugging injection and monitoring wells prior to the Post-Injection period. Grantor’s estimated cost of this plugging activity is \$2,025,000.00. The total plugging cost will be paid across the seven (7) equal annual funding installments made in the Injection Period, each installment consisting of \$289,285.71 for plugging expenses with the first installment prior to the one-year anniversary of authorization to operate a Class VI injection well and the remaining installments to be made individually on the successive anniversary until fully funding the principal amount of \$2,025,000.00.

 - Also, Grantor will fully fund the ERR Fund account making seven (7) equal annual installments of \$548,572.00 made in the Injection Period, with the first installment prior to the one-year anniversary Commission’s issuance of authorization to operate a Class VI injection well and the remaining installments to be made individually on the successive anniversary until fully funding the principal amount of \$5,960,000.00. However, if at any time the Commission determines the actual amount of the Commission Fee as calculated under N.D.C.C. 43-05-01-17 exceeds the principal amount then contained in the ERR account, then upon written direction from the Commission, Grantor shall fund amounts to bring the principal and income to an amount sufficient cover the Commission Fee.

- Grantor will fund the Fund account for post-injection site care, monitoring and site closure making seven (7) equal annual installments of \$1,691,286.00. Grantor's estimated cost of post-injection site care and monitoring is \$10,285,000.00 and site closure activities is \$1,554,000.00. The first installment to be made in the Injection period prior to the one-year anniversary of the Commission's issuance of authorization to operate a Class VI injection well and the remaining installments to be made individually on the successive anniversary until fully funding the principal amount of \$11,839,000.00.
- The seven (7) installments are to be made individually prior to the successive anniversary of the Commission's issuance of authorization to operate a Class VI injection well until fully funding the principal amount of \$19,824,000.00.
- **Post-Injection and Closure:** All costs associated with post-injection and closure activities must be funded before or at the start of the post-injection phase. However, the Fund may phase out these costs as associated Pre-Injection and Injection Period activities are completed (with approval from the Commission). For example, once wells have been plugged, their corresponding plugging costs may be subtracted from the total value of the Fund account.

Pay-in Schedule

Within seven (7) calendar days after the issuance of final Class VI authorization to operate for the three injection wells, Grantor will ensure that \$2,120,000.00 is in the Fund to cover the cost of Injection Period activities (Emergency and Remedial Response Plan). The total value of the trust at the beginning of the Injection Period will be \$2,120,000.00.

On or before the seven-year anniversary of the issuance of the final Class VI permit to operate for the three injection wells, Grantor will ensure that an additional \$17,704,000.00 is in the Fund to cover the remaining costs of the Pre-Injection, Injection, Post-Injection, and Closure Periods. An additional \$2,529,143.00 will be added on or before the one-year anniversary of the issuance of the final Class VI permit to operate for the three injection wells. An additional \$2,529,143.00 will be added on or before the two-year anniversary of the issuance of the final Class VI permit to operate for the three injection wells. An additional \$2,529,143.00 will be added on or before the three-year anniversary of the issuance of the final Class VI permit to operate for the three injection wells. An additional \$2,529,143.00 will be added on or before the four-year anniversary of the issuance of the final Class VI permit to operate for the three injection wells. An additional \$2,529,143.00 will be added on or before the five-year anniversary of the issuance of the final Class VI permit to operate for the three injection wells. An additional \$2,529,143.00 will be added on or before the six-year anniversary of the issuance of the final Class VI permit to operate for the three injection wells. A final installment of \$2,529,142.00 will be added on or before the seven-year anniversary for the permit to operate for the three injection wells, completing the phase-in of financial responsibility payments for the Pre-Injection, Post-Injection, and Closure Periods. Grantor may also elect to substitute another mechanism to demonstrate financial responsibility for emergency and remedial response for the injection and post-injection phases. If Commission approves such a substitution, this Agreement will be amended accordingly.

These amounts are based on the third-party cost estimate submitted by Grantor in its *Supporting Documentation: Underground Injection Control Class VI Injection Well Permit Applications for Tundra SGS _____ Wells __, __ and __*, dated _____ (Appendix __) and on the

Commission’s independent evaluation of the cost estimates. These costs are subject to review and approval by the Commission and may be adjusted for inflation or any change to the cost estimate in accordance with N.D.C.C. § 43-05-01-09.1.

Table 1 shows the activities and estimated costs according to when the payments would be required (i.e., at the start of the “Pre-Injection”) phase or at the start of the “Injection and Post-Injection Phase”).

Table 1: Trust Funding Schedule

Funding Phase	Activities	Total Activities’ Costs Prior to Funding Phase (\$000)	Amount to be Added Before End of Phase (\$000)
Pre-Injection (within 7 days of operating permit issuance)	Emergency and Remedial Response	\$5,960	\$2,120
	AoR and Corrective Action	\$0	
Injection (seven (7) equal installments prior to successive anniversaries of operating permit issuance)	Plugging Injection and Monitoring Wells	\$2,025	\$17,704
	Emergency and Remedial Response	\$3,840	
	Post-Injection Site Care (Includes Monitoring)	\$10,285	
	Closure	\$1,554	
Total Fund			\$19,824

Exhibit A: [Grantor] Designee Authorized to Instruct Trustee

[Name]

[Title]

[Grantor name or company if different]

[Address 1]

[Address 2]

[Phone]

[Grantor], as Grantor, may designate other designees by amendment to this Exhibit.

Exhibit B

Permitted Investments

- (i) Direct obligations of the United States of America or any agency or instrumentality thereof or obligations backed by the full faith and credit of the United States of America maturing in twelve (12) months or less from the date of acquisition:
- (ii) Commercial paper maturing in 180 days or less rated not lower than A-1, by Standard & Poor's or P-1 by Moody's Investors Service, Inc. on the date of acquisition.
- (iii) Demand deposits, time deposits or certificates of deposit maturing within one year in commercial banks whose obligations are rated A-1, A or the equivalent or better by Standard & Poor's on the date of acquisition;
- (iv) Money market or mutual funds whose investments are limited to those types of investments described in clauses (i) and (iii) above; and
- (v) Deposits of the Bank of North Dakota, to the extent guaranteed by the State of North Dakota under North Dakota Century Code Section 6-09-10, or a successor statute.

Exhibit C

Compensation and Reimbursement of Expenses
Trustees Fee Schedule

Outlined below are the initial and ongoing fees for the Bank of North Dakota to provide Trustee services:

One Time Initial Fee:	\$1,250.00
Annual fee for Administration:	\$1,250.00
Legal Review of Documents:	\$400 - \$600 estimated

Contact: Carrie Willits
(701) 328-5612
cwillits@nd.gov

The Annual Fee for Administration is subject to change upon a 30 day notification.

APPENDIX G-2

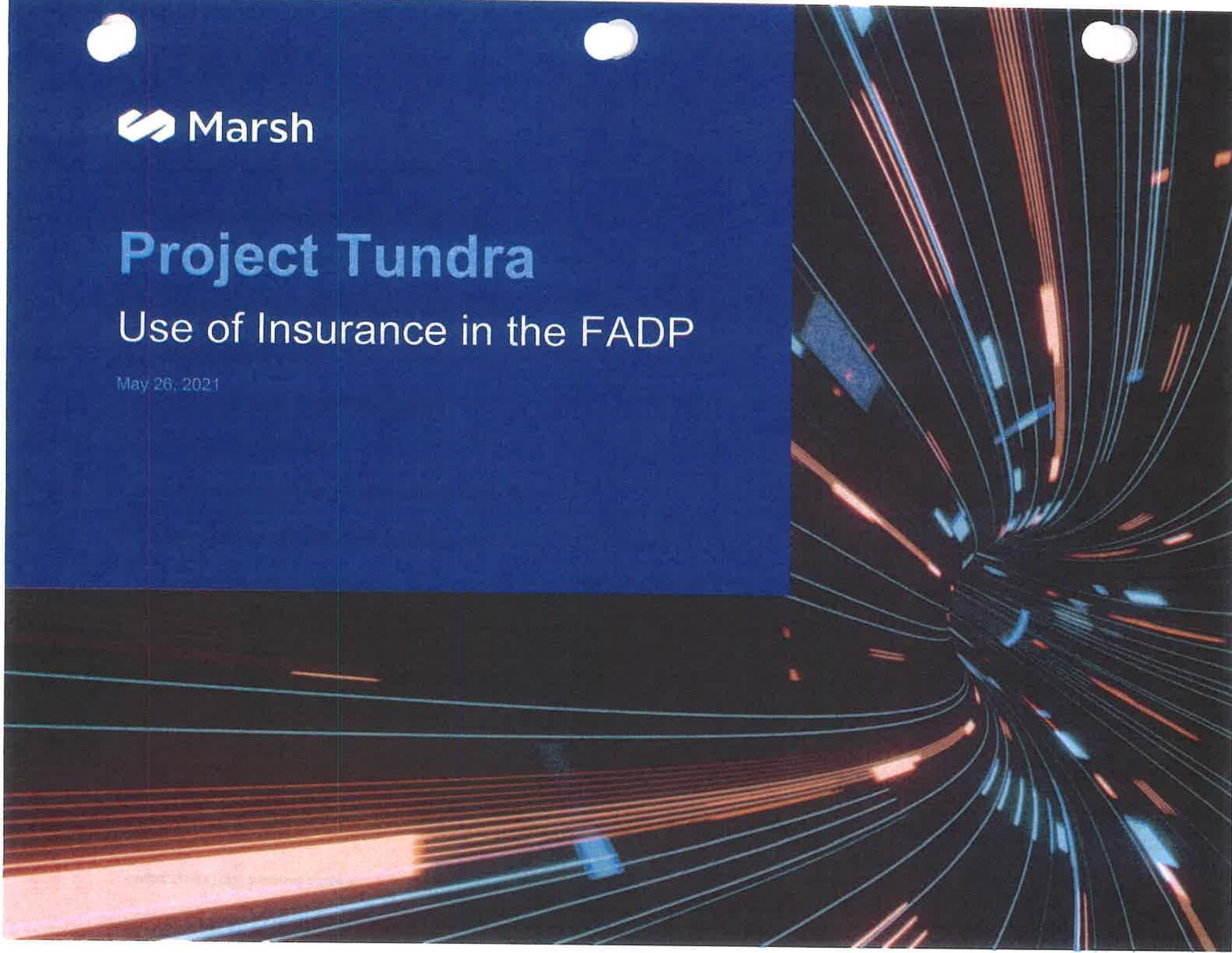
MARKET ASSESSMENT



Project Tundra

Use of Insurance in the FADP

May 26, 2021



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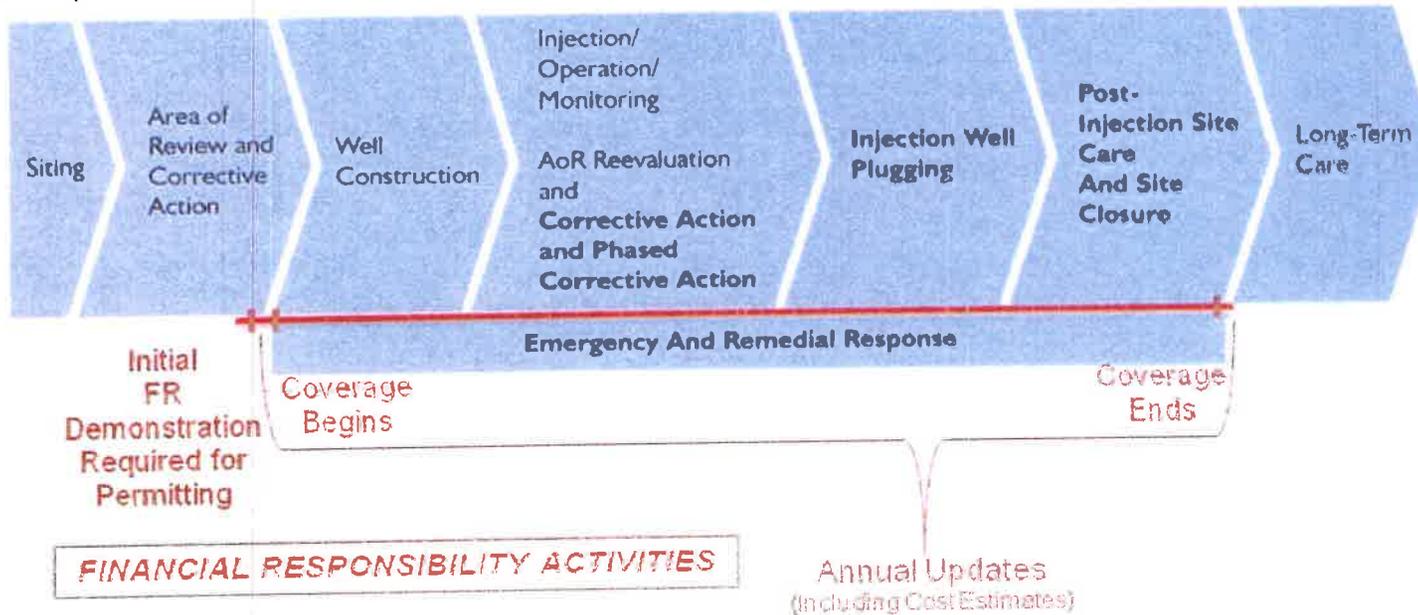
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Section One

Executive Summary

This document will examine pollution liability insurance options over the course of the operating lifetime of the CO₂ sequestration company, "Tundra SGS", including the 10 year, post-injection site care period prior to transfer of liability to the State of North Dakota. The following graphic is a helpful summary.



The market review was requested to outline the applicable environmental insurance products, expected policy terms and conditions, exclusions, costs and deductibles to support applicant to the North Dakota Industrial Commission for necessary UIC Class VI well injection permit financial responsibility requirements. The examination extends only to Contractors Pollution Liability, Pollution Liability and Operators Extra Expense/Control of Well insurances based on the Emergency and Remedial Response activities for the Tundra SGS geologic sequestration project, which could respond following a liability claim arising from contamination of an Underground Source of Drinking Water (USDW). First party/property insurances as well as the extended family of 3rd party liability insurance such as (but not limited to): general liability, auto liability, employer's liability, cyber liability, professional liability and all measure of executive liability coverages, while generally critical to the greater project

and highly recommended, are not under consideration in this analysis. All coverage descriptions, options and estimates provided herein are non-binding estimates based on whatever project data has been provided at this point. Over the 20+ year of life of the project (not to mention the next few months) these estimates will change, as such no guarantee is possible as to the future fitness of the program details provided in this report.

Marsh & McLennan Companies Introduction

[Marsh & McLennan Companies](#) (MMC) is the leading global professional services firm in the areas of risk, strategy and people. With annual revenue approaching USD17 billion and 76,000 colleagues worldwide, MMC helps clients navigate an increasingly dynamic and complex environment through four market-leading businesses: [Marsh](#), [Guy Carpenter](#), [Mercer](#), and [Oliver Wyman](#).

We are four companies, with one purpose: helping our clients to meet the challenges of our time.



About Marsh

Marsh is the world's leading insurance broker and risk adviser. With over 35,000 colleagues operating in more than 130 countries, Marsh serves commercial and individual clients with data driven risk solutions and advisory services.

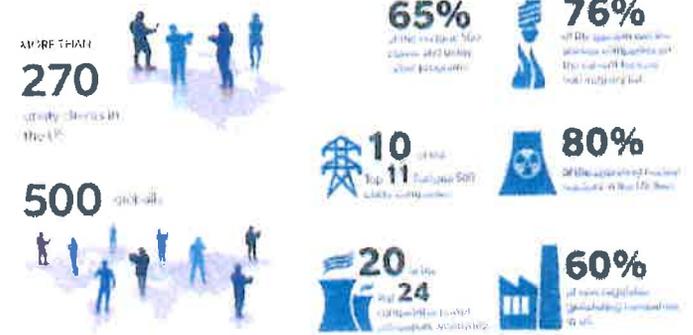
Power Industry Expertise

With more than 270 utility clients in the United States, the Marsh Power and Utilities team remains at the forefront of helping utilities manage the many risks they face. We placed over \$1 billion of insurance premium on behalf of our utility clients into the global insurance market. We are recognized as the leading broker in the power and utility industry sector, and have deep relationships with all the major insurers actively underwriting power and utilities business, including AEGIS, EIM, AIG, ANI, Everest, Liberty International, and FM Global. We have extensive knowledge and deliver results for clients owning all forms of power generation, including natural gas, coal, nuclear, hydro, biomass, geothermal, wind, solar, and energy storage.

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MARSH'S US POWER & UTILITY PRACTICE



Section Two

Coverage Assessment by Project Phase

This section outlines the certain types of insurance which may respond to a pollution event during certain phases of the project life.

Project Phase	General Risks Associated	Types of Insurance	Assumptions/Questions
Construction phase pollution event	<ol style="list-style-type: none"> 1. Pollution event during construction 2. Well control event during drilling or completion 	<ol style="list-style-type: none"> 1. Contractors Pollution Liability (CPL) for Contractor. Separate CPL policy for Owner interest. 2. Operators Extra Expense (OEE) for either owner or contractor as assigned in the drilling contract 	<ol style="list-style-type: none"> 1. CPL required by contract with contractor. Owners CPL operates as a difference in limits/difference in conditions to contractors policy 2. Party responsible to provide OEE is established by contract
Operations phase pollution event	<ol style="list-style-type: none"> 1. Pollution during operations 2. Well control event during operations 	<ol style="list-style-type: none"> 1. Pollution Liability (PL) Coverage for owner 2. Operators Extra Expense (OEE) for owner or operator 	<ol style="list-style-type: none"> 1. Multi-year policy could be desirable. Combined GL/PL may also be available 2. Responsibility to carry OEE can be transferred to the contract operator and can include operator of record via Contract Operator Endorsement.
Injection Well Plugging phase pollution event	Well control event during plugging	OEE for either owner or contractor as per contract	<p>Party responsible to provide OEE is established by contract.</p> <p>Owner's operating pollution liability coverage remains in force until Tundra SGS operations are discontinued</p>
Post Injection Site Care pollution event	Gradual migration of CO ₂ into USDWs	Pollution Liability	Following injection well plugging, pollution policies adjusted to maximum terms and renewed as necessary until liabilities assumed by State of North Dakota

Section Three

Contractors Pollution Liability Coverage Details

Summary

Contractors Pollution Liability (CPL) covers third party damages for bodily, injury property damage or cleanup related to pollution events which occur during construction operations. Unlike other pollution coverage, CPL does not have reporting windows for discovery or reporting of an occurrence. The following coverage sections can be included in a CPL policy:

- Coverage A: Contractors Pollution Liability
- Coverage B: Pollution Liability during Transportation
- Coverage C: Non-Owned Site Pollution Liability
- Coverage D: Time-Element Pollution Liability
- Coverage E: Image Restoration Expenses
- Coverage F: Disinfection Event Expenses
- Coverage G: Pre-Claim Event Expenses

Refer to Specimen Policy Form in Appendix A

Coverage terms and conditions are governed by the complete terms and conditions of the policy, including restrictions and exclusions. Defense is included within the limit of liability, with possibility for additional defense outside. Limits are structured as per incident and aggregate and are elected at time of binding.

Pollution Liability (PL) policies (discussed in the following section) prefer not to extend coverage to construction operations, including those events occurring during the operations period but arising directly from construction. Accordingly, in order to keep PL market selection as broad as possible, we recommend a separate CPL to cover construction operations.

Status of Market

The market for CPL is stable and very competitive. Viable markets include Ironshore, Aspen, Ascot, Enviant, Hamilton, and Markel.

Review of Coverage

Coverage Limits

Benchmarking reveals an average Contractors Pollution Liability purchase of \$20M for multi-year policies. Drilling contractors often carry lower than average CPL limits due to the historical experience of pollution events at contractor risk which occur during drilling operations, the rural location of their work and general reliance on the pollution coverage grants within other policies which can cover sudden and accidental pollution events. Selection of CPL limits is often driven by broader contract negotiations as well as the aggregate nature of the limit provided over the term of the construction period and completed operations period.

CPL coverage can be structured in many ways, as owner or contractor controlled for the project, owner's or contractor's interest separately or in a combination. The owner's basic objective should be to cover a target limit for pollution events arising from construction activities both during the actual construction and completed operations coverage for 10-years following construction. The simplest approach would be to require the contractor via the construction contract to carry the entire desired limit. While most contractors already carry CPL, the limit may not be large enough and is usually shared across the contractor's entire portfolio of projects. Given smaller usual limits and the shared aggregate, requiring the contractor to cover the entire desired limit can restrict contractor selection and distort available bids.

For this project we recommend that part of the desired CPL limit be stipulated by contract as a Contractor required insurance, along with others such as General Liability, Auto Liability, Excess, etc. All contractors and subcontractors engaged to perform work at the site should carry the required CPL. We further recommend the owner carry the balance of the desired limit in a CPL Owner's Interest policy to protect against contractor CPL policy deficiencies and termination of coverage or exhaustion of limit over the completed operations period. The owner's CPL policy would operate as Difference in Conditions/Difference in Limit to the Contractors so would only be accessed in the event the limit was exhausted or not maintained in accordance with the contract requirements. We recommend that both CPL and CPL Owner's interest policies be purchased during the construction period. For the contractor's CPL, a project specific policy is recommended, but not required in this case as the Owner's CPL can supplement. If contractor needs more flexible terms (such as lower limit and not project specific), the owner's CPL can be adjusted to make up the balance of the target pollution policy limit.

Market capacity for CPL is estimated at \$500M.

Deductible

Standard deductibles vary from \$25,000 to \$100,000 for Owner's Interest CPL policies

Exclusions

Exclusions – Refer to Specimen Policy Form in Appendix A

Some of the basic exclusions in a pollution legal liability policy are outlined below, however please note that this is not a complete listing of all exclusions or restrictions contained within the policy.

Applicable to All Insuring Agreements, Except as Indicated

-
- | | |
|--|---|
| <ul style="list-style-type: none"> • Criminal Fines, Penalties, and Assessments • Contractual Liability – except where noted in agreement • Prior Waste Disposal Activities • Intentional Noncompliance • Internal Expenses • Insured vs. Insured • Asbestos and Lead • Employer Liability • Prior Knowledge/Non-Disclosure | <ul style="list-style-type: none"> • Identified Underground Storage Tank (unless scheduled) • Closure/Post Closure and Reclamation Costs • Drilling and Specialty Equipment • Divested Property • Damage to Insured's Products and Work • Insured's Professional Services • Products Liability • Property Damage to Conveyances • Costs to Cleanup Pits or Ponds |
|--|---|
-

Renewal

The policies would not renew. The recommended Contractor's CPL and owner's interest CPL would both run the course of construction and carry a 10 year completed operations extension.

Cancellation

Policy cancellation as per Section IV. Conditions clause 3. Cancellation on page 11 of the sample wording in Appendix A

Many of these risks are written at 100% minimum earned. However, the minimum premium will continue to climb on a multi-year policy so that outpaces the earning. Rule of thumb would be that the policy is 100% fully earned at least two-thirds through a multi-year policy. Refer to policy language. Additionally, sample manuscript endorsements available.

Premium

CPL Limit: Contractor premiums are difficult to estimate without detailed knowledge of contractor revenues, operations and loss history.

CPL Owner's interest Limit Option: Construction Period plus 10 Years Completed Operations, Limit of \$10M – at \$50,000 Deductible = \$25,000 to \$35,000 annually (\$250,000 to \$350,000 for a 10-year term), not including applicable taxes and fees.

Pollution Liability Coverage Details

Summary

Pollution Liability is an insurance policy which protects business organizations against liability claims for bodily injury (BI), property damage (PD) and Cleanup (CU) arising out of premises and operations at scheduled locations. Coverage may include various extensions, including first party discovery, non-owned disposal sites, contingent transportation, emergency response, image restoration, and Natural Resource Damages. Additionally, as this coverage does not have reporting windows for events, it can be coordinated with other liability policies that may offer sudden & accidental pollution coverage, such as General Liability and Excess and Operators Extra Expense.

Pollution Liability (PL) coverage can be provided on an annual or multi-year policy term covering property, assets. Coverage is offered on a claims-made policy form for specifically scheduled assets. Coverage terms and conditions are governed by the complete terms and conditions of the policy, including restrictions and exclusions. Defense is included within the limit of liability, with possibility for additional defense outside. Limits are structured as per incident and aggregate. *Most often those limits are the same; however, some Insured's choose a split aggregate limit. A split aggregate makes it challenging to build a significant tower of limits.*

Coverage A: Third party claims for Bodily Injury, Property Damage or Remediation expenses

Coverage B: First party Remediation Expenses

Coverage C: Emergency Response Expenses

Coverage D: Evacuation Expenses

Coverage E: Image Restoration Expenses

Status of Market

The pollution market is hardening, fueled by claims and the exit of a major carrier. This has led to increased retentions, increased premiums, and lower limits. This has primarily applied to operators and facility owners. On the other hand, CO₂ sequestration has caught the attention of many insurers who want to be involved in the next trend, especially a green initiative. However, since CO₂ sequestration unrelated to enhanced oil recovery projects are rare, there is limited appetite at this moment. We anticipate that as more projects are developed and come to market, the coverage will be easier to obtain.

Many insurers offer coverage on an annual basis. However, some can offer on a multi-year basis. Therefore, it is important to remember the limits do not reinstate annually. However, this type of structure is advantageous as discounts are built into multi-year options. Pollution Liability is driven by severity, not frequency. Viable markets include Ironshore, Aspen, Ascot, Enviant, Hamilton, and Markel.

Review of Coverage

Coverage Limits

Benchmarking reveals an average Pollution Liability (PL) purchase of \$10M for annual and 2-3 year policies. Longer-term policies (such as 10 years) have larger limits to accommodate the possibility of erosion of the aggregate limit. At first glance, the average PL limit purchase of \$10M would appear lower than necessary to respond to recent pollution events. Pollution Liability is often purchased as an excess and difference in conditions coverage to sudden and accidental pollution coverage grants within the main liability program. Operational liability programs normally have much larger limits and serve as a natural downward influence on PL limits purchased. It is almost impossible to say how insurance programs covering CO₂ sequestration compare to the benchmark as there are so few working examples with pollution policies. Considering the nature of sequestration operations, contamination of an underground source of drinking water is likely to occur gradually and not be discovered until well after the event which caused it. Typical sudden & accidental pollution liability with discovery and reporting windows generally around 21 and 45-days respectively (and shorter) may not reasonably be expected to provide much coverage. Due to the novel nature of CO₂ sequestration operations and lack of an ability to rely on the sudden and accidental pollution grants within the operational liability, it is likely that selection of Pollution Liability limits by CO₂ sequestration operations will trend well above benchmarked limits.

For example, a leak in the well casing causing contamination of a source of underground drinking water could trigger various sections of the PL policy such as Coverages A, C and E and potentially D. Generally, the policy would respond to efforts to measure the extent of the contamination and compensate any users of the drinking water for property damage and/or bodily injury arising from the contamination. Costs to control the breach and restore the well to production would be covered under the OEE policy discussed in the following section.

Market capacity for PL for this risk is estimated at \$150M. A combined General Liability and Pollution Liability product is often preferred by other waste disposal operations as it tends to be more cost efficient than standalone liability and pollution towers. Given the novel nature of standalone CO₂ sequestration, this is certainly the desired option but may not be available until the market gains more comfort with sequestration operations.

Deductible

The minimum deductible for this risk will likely be \$250,000. Small credits are available for incremental increases in deductible but are generally not efficient. Deductible is usually established by market preference and premium for the overall account and limit. The preferred maximum deductible would be \$1,000,000, as very small discounts are provided above that amount. The deductible will be a self-insured retention versus a true deductible. Environmental markets do not typically analyze individual financial performance or require collateral for support.

Exclusions

Refer to Specimen Policy Form in Appendix B

Some of the basic exclusions in a PL policy are outlined below, however please note that this is not a complete listing of all exclusions or restrictions contained within the policy.

Applicable to All Insuring Agreements, Except as Indicated

-
- | | |
|---|---|
| <ul style="list-style-type: none"> • Criminal Fines, Penalties, and Assessments • Contractual Liability – except where noted in JOAs • Prior Waste Disposal Activities • Intentional Noncompliance • Internal Expenses • Insured vs. Insured • Asbestos and Lead • Employer Liability • Prior Knowledge/Non-Disclosure | <ul style="list-style-type: none"> • Identified Underground Storage Tank (unless scheduled) • Closure/Post Closure and Reclamation Costs • Drilling and Specialty Equipment • Divested Property • Damage to Insured's Products and Work • Insured's Professional Services • Products Liability • Property Damage to Conveyances • Costs to Cleanup Pits or Ponds |
|---|---|
-

Renewal

Operations: If PL is purchased on a standalone basis, then we recommend a multi-year period for premium efficiency. The longest available multi-year period for operating assets is usually three years. A combined GL/PL form may be available in the near future as Insurers become more comfortable with risk, technology and appetite. A combined form renews annually.

Post Injection Site Closure: After plugging of the injection well, it would be desirable (if possible) to purchase a 10-year policy to match the post injection site closure period.

Cancellation

Policy cancellation as per Section VII. Conditions clause E. on page 9 of the sample wording in Appendix B

Many of these risks are written at 100% minimum earned. However, the minimum premium will continue to climb on a multi-year policy so that outpaces the earning. Rule of thumb would be that the policy is 100% fully earned at least two-thirds through a multi-year policy. Refer to policy language. Additionally, sample manuscript endorsements available.

Premium

Pollution Legal Limit Options

PL Limit Option 1: Annual Limit of \$15M = \$125,000

PL Limit Option 2: Three-year Limit of \$25M = \$400,000

PL Limit Option 3: Three-year Limit of \$50M = \$700,000

All premiums are non-adjustable

Section Four

Operators Extra Expense Coverage Details

Operators Extra Expense (OEE), also known as Control of Well (COW), indemnifies owners against costs associated with a well out of control. The base coverage is divided into 3 coverage grants:

- A. Cost to control,
- B. Cost of re-drill or restoration of the well, and
- C. Cost of pollution clean-up

Coverage C. grant is of interest to this analysis but can only be triggered by a well out of control event per policy definition. Limits are also supplemented by various extensions (see below).

Review of Coverage

Coverage Limits

OEE policy limits are combined single limits of liability across all coverage sections and extensions for any one occurrence (including defense costs). Therefore, it is prudent to be conservative with limit selection. Conventional wisdom for OEE limit selection for exploration and production accounts holds that the OEE limit should be 3-5 times the dry hole cost of the well insured. While this approach tends to breakdown for uncommon well types and operations, it is considered the general benchmark in selecting limits. A comparison of five times the projected dry hole cost (\$5.8MM * 5 = \$29MM) and the sum of estimated Emergency and Remedial Response expenses from the FADP report (\$16.6MM) reveals that a limit of either \$25,000,000(100%) or \$30,000,000(100%) any one occurrence appears reasonable for both drilling and producing wells.

OEE and PL limits can be coordinated by the insured but the OEE limit is generally not viewed as substitute for PL coverage for the following reasons:

- The priority of payments clause on the OEE policy allows the Insured to direct the limit to whichever sections he chooses
- Operators prefer to reserve OEE limits for Cost to Control or Re-drill. These activities have been known to be very expensive in large or difficult claims and could leave little for pollution clean-up.
- Given the broader nature of PL coverage, insureds prefer to reserve PL limits for claims arising from an occurrence which would not be covered by either the OEE or Operational Liability program.

For example, a leak in the well casing causing contamination of a source of underground drinking water could trigger various sections of the OEE policy such as Coverages A, B and C. We recommend that Tundra SGS direct costs to control and restore the well to production first to the OEE

policy and deploy any remaining limit to clean-up pollution. The PL policy referenced above should be used to respond to all other remaining clean-up costs that are covered by the policy.

Coverage form should be as broad as possible and include such coverage extensions as: Making Wells Safe, Underground Control of Well, Care Custody and Control, Unlimited Re-Drill, Extended Re-Drill, Extended Pollution, and Removal of Wreck.

The load or credit associated with increased or diminished limits is discussed in the premium section.

Deductible

Often referred to as a retention or excess, the OEE policy carries a single deductible over all coverage sections. The Project should expect a deductible of between \$250,000(100%) and \$500,000(100%) any one occurrence for drilling and producing wells. Due to the small schedule and Minnkota's minimal well operating record, Insurers may be reluctant to offer lower deductibles.

The credit associated with increased deductibles is discussed in the premium section

Exclusions

A sample copy of the wording is provided in the Appendix C. Exclusions of note are:

-
- Fines or Penalties
 - Breach of Warranties Clause and breach of Due Diligence Clause
 - Delay or loss of use (adding Loss of Production Insurance would serve to add back coverage)
 - Costs arising out of a well which flow can be promptly controlled by use of onsite equipment or by increasing the weight of drilling fluid
 - Exclusion for claim recoverable under the policy solely by reason of the addition or attachment to Section A of the Underground Control of Well Endorsement. This exclusion should be amended or removed to better fit CO₂ Sequestration operations.
-

Renewal

Most OEE policies renew annually.

Cancellation

As per clause 13. Cancellation on page 9 of the sample policy wording in Appendix C

Premium

All premiums are annual minimum and deposit premiums which are adjustable for drilling wells and flat at inception for producing wells. Based on current market feedback, the \$100,000 minimum premium drives the premium during the operating phase due to the small schedule of wells and Minnkota's minimal well operating record. A contract operator could possibly leverage their experience and existing premium base to provide lower OEE premiums. Additionally, we may be able to negotiate lower premiums for the operating period once injection operations are established and the market is more comfortable with the risk.

Type of Well	Combined Single Limit	Est. Annual Premium
2 Broom Creek Wells (drilling phase)	\$25,000,000	Rate of 1.5% times Completed Well Cost (CWC), minimum annual premium \$100,000. Eg. CWC est. \$5.8M for each then Est. Annual Premium for 2 wells is \$174,000
	\$30,000,000 (option)	Rate of 1.7% on CWC, minimum annual premium of \$100,000. Eg. CWC est. \$5.8M for each then Est. Annual Premium for 2 wells is \$197,200
2 Broom Creek Wells (operating phase)	\$25,000,000	Rate of 10% of drilling rate subject to a minimum annual premium \$100,000. Est. Annual Premium is \$100,000
	\$30,000,000 (option)	Rate of 10% of drilling rate subject to a minimum annual premium \$100,000. Est. Annual Premium is \$100,000

Type of Well	Combined Single Limit	Est. Annual Premium
2 Broom Creek wells & 1 Deadwood Well (drilling phase)	\$25,000,000	Rate of 1.5% times Completed Well Cost (CWC), minimum annual premium \$100,000. Eg. CWC est. \$5.8M for each Broom Creek well and \$8.2M for the Deadwood well then Est. Annual Premium for 3 wells is \$297,000
	\$30,000,000 (option)	Rate of 1.7% on CWC, minimum annual premium of \$100,000. Eg. CWC est. \$5.8M for each Broom Creek well and \$8.2M for the Deadwood well then Est. Annual Premium for 3 wells is \$336,600
2 Broom Creek wells & 1 Deadwood well (operating phase)	\$25,000,000	Rate of 10% of drilling rate subject to a minimum annual premium \$100,000. Est. Annual Premium is \$100,000
	\$30,000,000 (option)	Rate of 10% of drilling rate subject to a minimum annual premium \$100,000. Est. Annual Premium is \$100,000

Appendix A

Contractors Pollution Wording



Ironshore sample
CPL wording.pdf

Appendix B

Pollution Liability Policy Wording



IE.COV.SPILLS.OG.001
1212 Oil and Gas Cc

Appendix C

OEE Draft Policy Wording



EED FORM.pdf



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APPENDIX H

SURFACE USE AND PORE SPACE LEASE

**STORAGE AGREEMENT
TUNDRA DEADWOOD – SECURE GEOLOGIC STORAGE
OLIVER COUNTY, NORTH DAKOTA**

THIS AGREEMENT (“Agreement”) is entered into as of the 1st day of November 1, 2021, by the parties who have signed the original of this instrument, a counterpart thereof, ratification and joinder or other instrument agreeing to become a Party hereto.

RECITALS:

A. It is in the public interest to promote the geologic storage of carbon dioxide in a manner which will benefit the state and the global environment by reducing greenhouse gas emissions and in a manner which will help ensure the viability of the state's coal and power industries, to the economic benefit of North Dakota and its citizens;

B. To further geologic storage of carbon dioxide, a potentially valuable commodity, may allow for its ready availability if needed for commercial, industrial, or other uses, including enhanced recovery of oil, gas, and other minerals; and

C. For geologic storage, however, to be practical and effective requires cooperative use of surface and subsurface property interests and the collaboration of property owners, which may require procedures that promote, in a manner fair to all interests, cooperative management, thereby ensuring the maximum use of natural resources.

AGREEMENT:

It is agreed as follows:

**ARTICLE 1
DEFINITIONS**

As used in this Agreement:

1.1 **Carbon Dioxide** means carbon dioxide in gaseous, liquid, or supercritical fluid state together with incidental associated substances derived from the source materials, capture process and any substances added or used to enable or improve the injection process.

1.2 **Commission** means the North Dakota Industrial Commission.

1.3 **Effective Date** is the time and date this Agreement becomes effective as provided in Article 14.

1.4 **Facility Area** is the land described by Tracts in Exhibit “B” and shown on Exhibit “A” containing 18903.211 acres, more or less.

1.5 **Party** is any individual, corporation, limited liability company, partnership, association, receiver, trustee, curator, executor, administrator, guardian, tutor, fiduciary, or other representative of any kind, any department, agency, or instrumentality of the state, or any governmental subdivision thereof, or any other entity capable of holding an interest in the Storage Reservoir.

1.6 **Pore Space** means a cavity or void, whether natural or artificially created, in any subsurface stratum.

1.7 **Pore Space Interest** is a right to or interest in the Pore Space in any Tract within the boundaries of the Facility Area.

1.8 **Pore Space Owner** is a Party hereto who owns Pore Space Interest.

1.9 **Storage Equipment** is any personal property, lease and well equipment, plants and other facilities and equipment for use in Storage Operations.

1.10 **Storage Expense** is all costs, expense or indebtedness incurred by the Storage Operator pursuant to this Agreement for or on account of Storage Operations.

1.11 **Storage Reservoir** consists of the Pore Space and confining subsurface strata underlying the Facility Area described as the Opeche-Picard (Upper Confining Zone), Broom Creek (Storage Reservoir/Injection Zone), and Amsden (Lower Confining Zone) Formation(s) and which are defined as identified by the well logging suite performed at two stratigraphic wells, the J-LOC 1 well (File No. 37380) and the J-ROC 1 1 well (File No. 37672). The log suites included caliper, gamma ray (GR), density, porosity (neutron, density), dipole sonic, resistivity, spectral GR, a combinable magnetic resonance (CMR), and fracture finder log. Further, the logs were used to pick formation top depths and interpret lithology, petrophysical properties, and time-to-depth shifting of seismic data obtained from two 3D seismic surveys covering an area totaling 18.5 miles in and around the J-ROC 1 1 (located in Section 4, Township 141 North, Range 83 West) and the J-LOC 1 (located in Section 27, Township 142 North, Range 84 West) stratigraphic wells located in Oliver County, North Dakota. Formation top depths were picked from the top of the Pierre Formation to the top of the Precambrian. These logs and data which encompass the stratigraphic interval from an average depth of 4,650 feet to an average depth of 5,450 feet within the limits of the Facility Area.

1.12 **Storage Facility** is the unitized or amalgamated Storage Reservoir created pursuant to an order of the Commission.

1.13 **Storage Facility Participation** is the percentage shown on Exhibit "C" for allocating payments for use of the Pore Space under each Tract identified in Exhibit "B".

1.14 **Storage Operations** are all operations conducted by the Storage Operator pursuant to this Agreement or otherwise authorized by any lease covering any Pore Space Interest.

1.15 **Storage Operator** is the person or entity named in Section 4.1 of this Agreement.

1.16 **Storage Rights** are the rights to explore, develop, and operate lands within the Facility Area for the storage of Storage Substances.

1.17 **Storage Substances** are Carbon Dioxide and incidental associated substances, fluids, and minerals.

1.18 **Tract** is the land described as such and given a Tract number in Exhibit "B."

ARTICLE 2 EXHIBITS

2.1 **Exhibits**. The following exhibits, which are attached hereto, are incorporated herein by reference:

2.1.1 Exhibit "A" is a map that shows the boundary lines of the Tundra Deadwood Facility Area and the tracts therein;

2.1.2 Exhibit "B" is a schedule that describes the acres of each Tract in the Tundra Deadwood Facility Area;

2.1.3 Exhibit "C" is a schedule that shows the Storage Facility Participation of each Tract; and

2.1.4 Exhibit "D" is a form of Surface Use and Pore Space Lease.

2.2 **Reference to Exhibits**. When reference is made to an exhibit, it is to the exhibit as originally attached or, if revised, to the last revision.

2.3 **Exhibits Considered Correct**. Exhibits "A," "B," "C" and "D" shall be considered to be correct until revised as herein provided.

2.4 **Correcting Errors**. The shapes and descriptions of the respective Tracts have been established by using the best information available. If it subsequently appears that any Tract, mechanical miscalculation or clerical error has been made, Storage Operator, with the approval of Pore Space Owners whose interest is affected, shall correct the mistake by revising the exhibits to conform to the facts. The revision shall not include any re-evaluation of engineering or geological interpretations used in determining Storage Facility Participation. Each such revision of an exhibit made prior to thirty (30) days after the Effective Date shall be effective as of the Effective Date. Each such revision thereafter made shall be effective at 7:00 a.m. on the first day of the calendar month next following the filing for record of the revised exhibit or on such other date as may be determined by Storage Operator and set forth in the revised exhibit.

2.5 **Filing Revised Exhibits**. If an exhibit is revised, Storage Operator shall execute an appropriate instrument with the revised exhibit attached and file the same for record in the county or counties in which this Agreement or memorandum of the same is recorded and shall also file the amended changes with the Commission.

ARTICLE 3
CREATION AND EFFECT OF STORAGE FACILITY

3.1 **Unleased Pore Space Interests.** Any Pore Space Owner in the Storage Facility who owns a Pore Space Interest in the Storage Reservoir that is not leased for the purposes of this Agreement and during the term hereof, shall be treated as if it were subject to the Surface Use and Pore Space Lease attached hereto as Exhibit "D".

3.2 **Amalgamation of Pore Space.** All Pore Space Interests in and to the Tracts are hereby amalgamated and combined insofar as the respective Pore Space Interests pertain to the Storage Reservoir, so that Storage Operations may be conducted with respect to said Storage Reservoir as if all of the Pore Space Interests in the Facility Area had been included in a single lease executed by all Pore Space Owners, as lessors, in favor of Storage Operator, as lessee and as if the lease contained all of the provisions of this Agreement.

3.3 **Amendment of Leases and Other Agreements.** The provisions of the various leases, agreements, or other instruments pertaining to the respective Tracts or the storage of the Storage Substances therein, including the Surface Use and Pore Space Lease attached hereto as Exhibit "D", are amended to the extent necessary to make them conform to the provisions of this Agreement, but otherwise shall remain in effect.

3.4 **Continuation of Leases and Term Interests.** Injection in to any part of the Storage Reservoir, or other Storage Operations, shall be considered as injection in to or upon each Tract within said Storage Reservoir, and such injection or operations shall continue in effect as to each lease as to all lands and formations covered thereby just as if such operations were conducted on and as if a well were injecting in each Tract within said Storage Reservoir.

3.5 **Titles Unaffected by Storage.** Nothing herein shall be construed to result in the transfer of title of the Pore Space Interest of any Party hereto to any other Party or to Storage Operator.

3.6 **Injection Rights.** Storage Operator is hereby granted the right to inject into the Storage Reservoir any Storage Substances in whatever amounts Storage Operator may deem expedient for Storage Operations, together with the right to drill, use, and maintain injection wells in the Facility Area, and to use for injection purposes.

3.7 **Transfer of Storage Substances from Storage Facility.** Storage Operator may transfer from the Storage Facility any Storage Substances, in whatever amounts Storage Operator may deem expedient for Storage Operations, to any other reservoir, subsurface stratum or formation permitted by the Commission for the storage of carbon dioxide under Chapter 38-22 of the North Dakota Century Code. The transfer of such Storage Substances out of the Storage Facility shall be disregarded for the purposes of calculating the royalty under any lease covering a Pore Space Interest (including Exhibit "D") and shall not affect the allocation of Storage Substances injected into the Storage Facility through the surface of the Facility Area in accordance with Article 6 of this Agreement.

3.8 **Receipt of Storage Substances.** Storage Operator may accept and receive into the Storage Facility any Storage Substances, in whatever amounts Storage Operator may deem expedient for Storage Operations, being stored in any other reservoir, subsurface stratum or formation permitted by the Commission for the storage of carbon dioxide under Chapter 38-22 of the North Dakota Century Code. The receipt of such Storage Substances into the Storage Facility shall be disregarded for the purposes of calculating the royalty under any lease covering a Pore Space Interest (including Exhibit "D") and shall not affect the allocation of Storage Substances injected into the Storage Facility through the surface of the Facility Area in accordance with Article 6 of this Agreement.

3.9 **Cooperative Agreements.** Storage Operator may enter into cooperative agreements with respect to lands adjacent to the Facility Area for the purpose of coordinating Storage Operations. Such cooperative agreements may include, but shall not be limited to, agreements regarding the transfer and receipt of Storage Substances pursuant to Sections 3.7 and 3.8 of this Agreement.

3.10 **Border Agreements.** Storage Operator may enter into an agreement or agreements with owners of adjacent lands with respect to operations which may enhance the injection of the Storage Substances in the Storage Reservoir in the Facility Area or which may otherwise be necessary for the conduct of Storage Operations.

ARTICLE 4 STORAGE OPERATIONS

4.1 **Storage Operator.** Minnkota Power Cooperative, Inc. is hereby designated as the initial Storage Operator. Storage Operator shall have the exclusive right to conduct Storage Operations, which shall conform to the provisions of this Agreement and any lease covering a Pore Space Interest. If there is any conflict between such agreements, this Agreement shall govern.

4.2 **Successor Operators.** The initial Storage Operator and any subsequent operator may, at any time, transfer operatorship of the Storage Facility with and upon the approval of the Commission.

4.3 **Method of Operation.** Storage Operator shall engage in Storage Operations with diligence and in accordance with good engineering and injection practices.

4.4 **Change of Method of Operation.** As permitted by the Commission nothing herein shall prevent Storage Operator from discontinuing or changing in whole or in part any method of operation which, in its opinion, is no longer in accord with good engineering or injection practices. Other methods of operation may be conducted or changes may be made by Storage Operator from time to time if determined by it to be feasible, necessary or desirable to increase the injection or storage of Storage Substances.

**ARTICLE 5
TRACT PARTICIPATIONS**

5.1 **Tract Participations.** The Storage Facility Participation of each Tract is shown in Exhibit "C." The Storage Facility Participation of each Tract shall be based 100% upon the ratio of surface acres in each Tract to the total surface acres for all Tracts within the Facility Area.

5.2 **Relative Storage Facility Participations.** If the Facility Area is enlarged or reduced, the revised Storage Facility Participation of the Tracts remaining in the Facility Area and which were within the Facility Area prior to the enlargement or reduction shall remain in the same ratio to one another.

**ARTICLE 6
ALLOCATION OF STORAGE SUBSTANCES**

6.1 **Allocation of Tracts.** All Storage Substances injected shall be allocated to the several Tracts in accordance with the respective Storage Facility Participation effective during the period that the Storage Substances are injected. The amount of Storage Substances allocated to each tract, regardless of whether the amount is more or less than the actual injection of Storage Substances from the well or wells, if any, on such Tract, shall be deemed for all purposes to have been injected into such Tract. Storage Substances transferred or received pursuant to Sections 3.7 and 3.8 of this Agreement shall be disregarded for the purposes of this Section 6.1.

6.2 **Distribution within Tracts.** The Storage Substances injected and allocated to each Tract shall be distributed among, or accounted for to, the Pore Space Owners who own a Pore Space Interest in such Tract in accordance with the Pore Space Owners' Storage Facility Participation effective during the period that the Storage Substances were injected. If any Pore Space Interest in a Tract hereafter becomes divided and owned in severalty as to different parts of the Tract, the owners of the divided interests, in the absence of an agreement providing for a different division, shall be compensated for the storage of the Storage Substances in proportion to the surface acreage of their respective parts of the Tract. Storage Substances transferred or received pursuant to Sections 3.7 and 3.8 of this Agreement shall be disregarded for the purposes of this Section 6.2.

**ARTICLE 7
TITLES**

7.1 **Warranty and Indemnity.** Each Pore Space Owner who, by acceptance of revenue for the injection of Storage Substances into the Storage Reservoir, shall be deemed to have warranted title to its Pore Space Interest, and, upon receipt of the proceeds thereof to the credit of such interest, shall indemnify and hold harmless the Storage Operator and other Parties from any loss due to failure, in whole or in part, of its title to any such interest.

7.2 **Injection When Title Is in Dispute.** If the title or right of any Pore Space Owner claiming the right to receive all or any portion of the proceeds for the storage of any Storage Substances allocated to a Tract is in dispute, Storage Operator shall require that the Pore Space Owner to whom the proceeds thereof are paid furnish security for the proper accounting thereof to the rightful Pore Space Owner if the title or right of such Pore Space Owner fails in whole or in part.

7.3 **Payments of Taxes to Protect Title.** The owner of surface rights to lands within the Facility Area is responsible for the payment of any *ad valorem* taxes on all such rights, interests or property, unless such owner and the Storage Operator otherwise agree. If any *ad valorem* taxes are not paid by or for such owner when due, Storage Operator may at any time prior to tax sale or expiration of period of redemption after tax sale, pay the tax, redeem such rights, interests or property, and discharge the tax lien. Storage Operator shall, if possible, withhold from any proceeds derived from the storage of Storage Substances otherwise due any Pore Space Owner who is a delinquent taxpayer an amount sufficient to defray the costs of such payment or redemption, such withholding to be credited to the Storage Operator. Such withholding shall be without prejudice to any other remedy available to Storage Operator.

7.4 **Pore Space Interest Titles.** If title to a Pore Space Interest fails, but the tract to which it relates is not removed from the Facility Area, the Party whose title failed shall not be entitled to share under this Agreement with respect to that interest.

ARTICLE 8 EASEMENTS OR USE OF SURFACE

8.1 **Grant of Easement.** Storage Operator shall have the right to use as much of the surface of the land within the Facility Area as may be reasonably necessary for Storage Operations and the injection of Storage Substances.

8.2 **Use of Water.** Storage Operator shall have and is hereby granted free use of water from the Facility Area for Storage Operations, except water from any well, lake, pond or irrigation ditch of a Pore Space Owner; notwithstanding the foregoing, Storage Operator may access any well, lake, or pond as provided in Exhibit "D".

8.3 **Surface Damages.** Storage Operator shall pay surface owners for damage to growing crops, timber, fences, improvements and structures located on the Facility Area that result from Storage Operations.

8.4 **Surface and Sub-Surface Operating Rights.** Except to the extent modified in this Agreement, Storage Operator shall have the same rights to use the surface and sub-surface and use of water and any other rights granted to Storage Operator in any lease covering Pore Space Interests. Except to the extent expanded by this Agreement or the extent that such rights are common to the effected leases, the rights granted by a lease may be exercised only on the land covered by that lease. Storage Operator will to the extent possible minimize surface impacts.

ARTICLE 9 ENLARGEMENT OF STORAGE FACILITY

9.1 **Enlargement of Storage Facility.** The Storage Facility may be enlarged from time to time to include acreage and formations reasonably proven to be geologically capable of storing Storage Substances. Any expansion must be approved in accordance with the rules and regulations of the Commission.

9.2 **Determination of Tract Participation.** Storage Operator, subject to Section 5.2, shall determine the Storage Facility Participation of each Tract within the Storage Facility as enlarged, and shall revise Exhibits “A”, “B” and “C” accordingly and in accordance with the rules, regulations and orders of the Commission.

9.3 **Effective Date.** The effective date of any enlargement of the Storage Facility shall be effective as determined by the Commission.

ARTICLE 10 TRANSFER OF TITLE PARTITION

10.1 **Transfer of Title.** Any conveyance of all or part of any interest owned by any Party hereto with respect to any Tract shall be made expressly subject to this Agreement. No change of title shall be binding upon Storage Operator, or any Party hereto other than the Party so transferring, until 7:00 a.m. on the first day of the calendar month following thirty (30) days from the date of receipt by Storage Operator of a photocopy, or a certified copy, of the recorded or filed instrument evidencing such a change in ownership.

10.2 **Waiver of Rights to Partition.** Each Party hereto agrees that, during the existence of this Agreement, it will not resort to any action to partition any Tract or parcel within the Facility Area or the facilities used in the development or operation thereof, and to that extent waives the benefits or laws authorizing such partition.

ARTICLE 11 RELATIONSHIP OF PARTIES

11.1 **No Partnership.** The duties, obligations and liabilities arising hereunder shall be several and not joint or collective. This Agreement is not intended to create, and shall not be construed to create, an association or trust, or to impose a partnership duty, obligation or liability with regard to any one or more of the Parties hereto. Each Party hereto shall be individually responsible for its own obligations as herein provided.

11.2 **No Joint Marketing.** This Agreement is not intended to provide, and shall not be construed to provide, directly or indirectly, for any joint marketing of Storage Substances.

11.3 **Pore Space Owners Free of Costs.** This Agreement is not intended to impose, and shall not be construed to impose, upon any Pore Space Owner any obligation to pay any Storage Expense unless such Pore Space Owner is otherwise so obligated.

11.4 **Information to Pore Space Owners.** Each Pore Space Owner shall be entitled to all information in possession of Storage Operator to which such Pore Space Owner is entitled by an existing lease or a lease imposed by this Agreement.

**ARTICLE 12
LAWS AND REGULATIONS**

12.1 **Laws and Regulations.** This Agreement shall be subject to all applicable federal, state and municipal laws, rules, regulations and orders.

**ARTICLE 13
FORCE MAJEURE**

13.1 **Force Majeure.** All obligations imposed by this Agreement on each Party, except for the payment of money, shall be suspended while compliance is prevented, in whole or in part, by a labor dispute, fire, war, civil disturbance, or act of God; by federal, state or municipal laws; by any rule, regulation or order of a governmental agency; by inability to secure materials; or by any other cause or causes, whether similar or dissimilar, beyond reasonable control of the Party. No Party shall be required against his will to adjust or settle any labor dispute. Neither this Agreement nor any lease or other instrument subject hereto shall be terminated by reason of suspension of Storage Operations due to any one or more of the causes set forth in this Article.

**ARTICLE 14
EFFECTIVE DATE**

14.1 **Effective Date.** This Agreement shall become effective as determined by the Commission.

14.2 **Ipsa Facto Termination.** If the requirements of Section 14.1 are not accomplished on or before April 1, 2022 this Agreement shall *ipso facto* terminate on that date (hereinafter called "termination date") and thereafter be of no further effect, unless prior thereto Pore Space Owners owning a combined Storage Facility Participation of at least thirty percent (30%) of the Facility Area have become Parties to this Agreement and have decided to extend the termination date for a period not to exceed six (6) months. If the termination date is so extended and the requirements of Section 14.1 are not accomplished on or before the extended termination date this Agreement shall *ipso facto* terminate on the extended termination date and thereafter be of no further effect.

14.3 **Certificate of Effectiveness.** Storage Operator shall file for record in the county or counties in which the land affected is located a certificate stating the Effective Date of this Agreement.

**ARTICLE 15
TERM**

15.1 **Term.** Unless sooner terminated in the manner hereinafter provided or by order of the Commission, this Agreement shall remain in full force and effect until the Commission has issued a certificate of project completion with respect to the Storage Facility in accordance with § 38-22-17 of the North Dakota Century Code.

15.2 **Termination by Storage Operator.** This Agreement may be terminated at any time by the Storage Operator with the approval of the Commission.

15.3 **Effect of Termination.** Upon termination of this Agreement all Storage Operations shall cease. Each lease and other agreement covering Pore Space within the Facility Area shall remain in force for ninety (90) days after the date on which this Agreement terminates, and for such further period as is provided by Exhibit "C" or other agreement.

15.4 **Salvaging Equipment Upon Termination.** If not otherwise granted by Exhibit "C" or other instruments affecting each Tract, Pore Space Owners hereby grant Storage Operator a period of six (6) months after the date of termination of this Agreement within which to salvage and remove Storage Equipment.

15.5 **Certificate of Termination.** Upon termination of this Agreement, Storage Operator shall file for record in the county or counties in which the land affected is located a certificate that this Agreement has terminated, stating its termination date.

ARTICLE 16 APPROVAL

16.1 **Original, Counterpart or Other Instrument.** A Pore Space Owner may approve this Agreement by signing the original of this instrument, a counterpart thereof, ratification or joinder or other instrument approving this instrument hereto. The signing of any such instrument shall have the same effect as if all Parties had signed the same instrument.

16.2 **Joinder in Dual Capacity.** Execution as herein provided by any Party as either a Pore Space Owner or the Storage Operator shall commit all interests owned or controlled by such Party and any additional interest thereafter acquired in the Facility Area.

16.3 **Approval by the North Dakota Industrial Commission.** Notwithstanding anything in this Article to the contrary, all Tracts within the Facility Area shall be deemed to be qualified for participation if this Agreement is duly approved by order of the Commission.

ARTICLE 17 GENERAL

17.1 **Amendments Affecting Pore Space Owners.** Amendments hereto relating wholly to Pore Space Owners may be made with approval by the Commission.

17.4 **Construction.** This agreement shall be construed according to the laws of the State of North Dakota.

ARTICLE 18
SUCCESSORS AND ASSIGNS

18.1 Successors and Assigns. This Agreement shall extend to, be binding upon, and inure to the benefit of the Parties hereto and their respective heirs, devisees, legal representatives, successors and assigns and shall constitute a covenant running with the lands, leases and interests covered hereby.

[Remainder of page intentionally left blank. Signature page follows.]

Executed the date set opposite each name below but effective for all purposes as provided by Article 14.

Dated: _____, 2021

STORAGE OPERATOR

MINNKOTA POWER COOPERATIVE, INC.

By: _____

Its: _____

71751370.1

CENTER

Exhibit A

Attached to and made part of the Storage Agreement
Tundra Deadwood - Security Geological Storage
Oliver County, North Dakota

★
YOUNG
STATION

LEGEND	
PERMIT BOUNDARY	
TRACT NUMBER	37
PLSS SECTION NUMBER	10



July 21, 2021

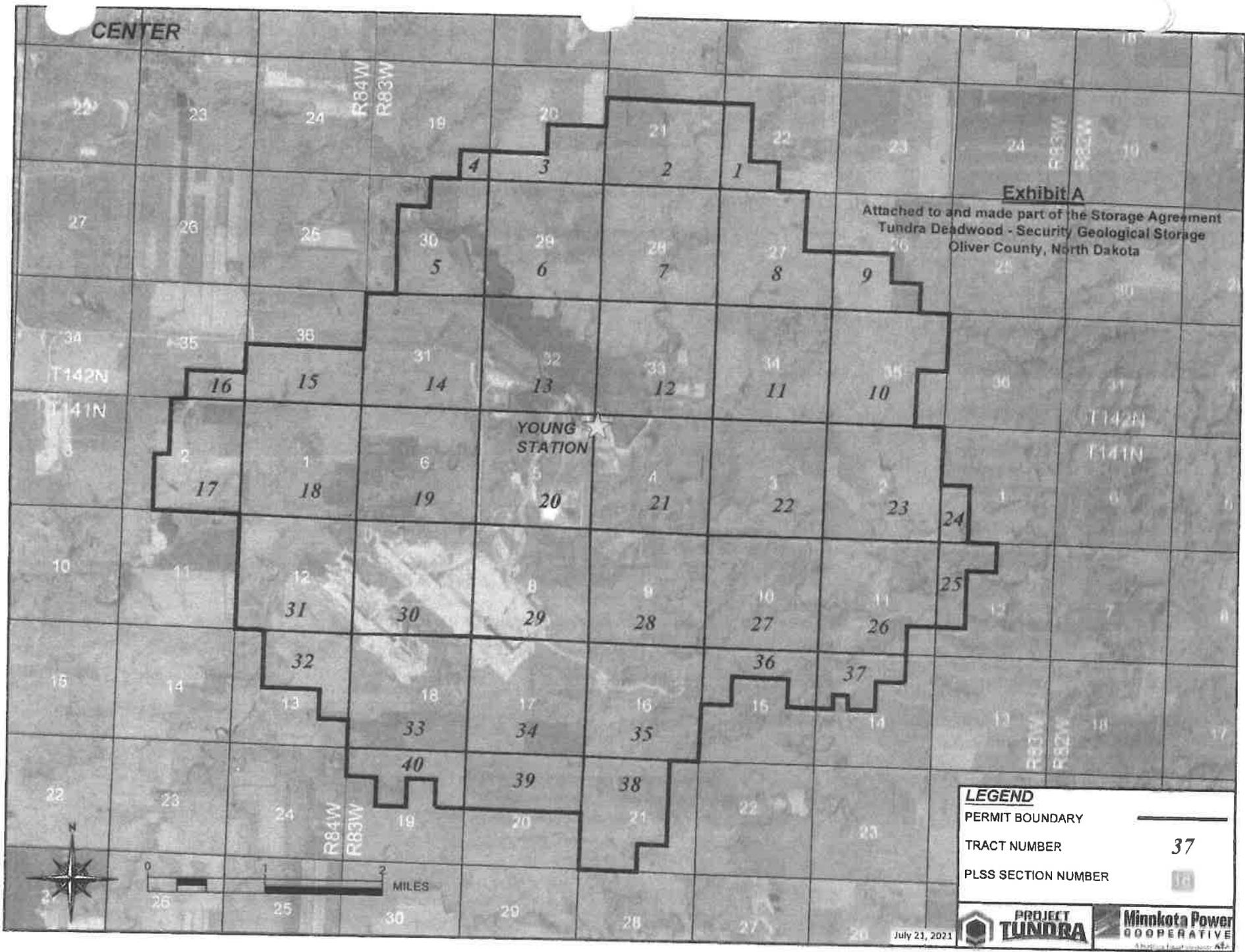


EXHIBIT B

Tract Summary

Attached to and made part of the Storage Agreement
Tundra Deadwood - Secure Geological Storage
Oliver County, North Dakota

<u>Tract No.</u>	<u>Land Description</u>	<u>Owner Name</u>	<u>Tract Net Acres</u>	<u>Tract Participation</u>	<u>Storage Facility Participation</u>
1	Section 22-T142N-R83W	Melvin Schoepp	20.000	12.50000000%	0.10580213%
		Caroline K. Schoepp	20.000	12.50000000%	0.10580213%
		Marie Mosbrucker	30.000	18.75000000%	0.15870320%
		Raymond Friedig	30.000	18.75000000%	0.15870320%
		Duane Friedig	30.000	18.75000000%	0.15870320%
		Shirley Hilzendeger	30.000	18.75000000%	0.15870320%
		Tract Total:		160.000	100.00000000%
2	Section 21-T142N-R83W	Jeff Erhardt and Mary Erhardt	120.000	25.00000000%	0.63481278%
		Keith Erhardt	35.000	7.29166667%	0.18515373%
		Keith Erhardt and Kelly Jo Erhardt	5.000	1.04166667%	0.02645053%
		Melvin Schoepp and Caroline Schoepp	320.000	66.66666667%	1.69283409%
		Tract Total:		480.000	100.00000000%
3	Section 20-T142N-R83W	Jeff Erhardt and Mary Erhardt	160.000	66.66666667%	0.84641705%
		Matthias A. Erhardt, as trustee of the Matthias A. Erhardt Trust dated December 27, 1994	40.000	16.66666667%	0.21160426%
		Josephine Erhardt, as trustee of the Josephine Erhardt Trust dated December 27, 1994	40.000	16.66666667%	0.21160426%
		Tract Total:		240.000	100.00000000%
4	Section 19-T142N-R83W	Matthias A. Erhardt, trustee, or successor trustee(s), of the Matthias A. Erhardt Trust dated December 27, 1994	20.000	50.00000000%	0.10580213%
		Josephine Erhardt, trustee, or successor trustee(s), of the Josephine Erhardt Trust dated December 27, 1994	20.000	50.00000000%	0.10580213%
		Tract Total:		40.000	100.00000000%
5	Section 30-T142N-R83W	Minnkota Power Cooperative, Inc.	322.170	73.22045455%	1.70431362%
		Ryan J. Weber	40.000	9.09090909%	0.21160426%

		Darlene Voegele	77.830	17.68863636%	0.41172899%
		Tract Total:	440.000	100.00000000%	
6	Section 29-T142N-R83W	Minnkota Power Cooperative, Inc.	92.360	14.43125000%	0.48859424%
		Darlene Voegele	227.640	35.56875000%	1.20423985%
		Charles Kuether	150.000	23.43750000%	0.79351598%
		Doris Kuether	150.000	23.43750000%	0.79351598%
		Terrie Nehring	20.000	3.12500000%	0.10580213%
		Tract Total:	640.000	100.00000000%	
7	Section 28-T142N-R83W	Minnkota Power Cooperative, Inc.	160.000	25.00000000%	0.84641705%
		Dale Barth	476.320	74.42500000%	2.51978354%
		Dusty Backer	3.680	0.57500000%	0.01946759%
		Tract Total:	640.000	100.00000000%	
8	Section 27-T142N-R83W	Dale Barth	560.000	100.00000000%	2.96245966%
		Tract Total:	560.000	100.00000000%	
9	Section 26-T142N-R83W	Raymond Friedig, as personal representative of the Estate of Magdalen F. Friedig, deceased	154.460	77.23000000%	0.81710986%
		Carl Schwalbe	13.333	6.66666567%	0.07053475%
		Heirs or Devises of the Estate of Loren Schwalbe, deceased	13.333	6.66666567%	0.07053475%
		Rolland Schwalbe	13.333	6.66666567%	0.07053475%
		Randolph Middleton and Mary Middleton	5.540	2.77000000%	0.02930719%
		Tract Total:	200.000	100.00000000%	
10	Section 35-T142N-R83W	Brennan Price	560.000	100.00000000%	2.96245966%
		Tract Total:	560.000	100.00000000%	
11	Section 34-T142N-R83W	Minnkota Power Cooperative, Inc.	477.990	74.68593750%	2.52861802%
		State of North Dakota	160.000	25.00000000%	0.84641705%
		County of Oliver	2.010	0.31406250%	0.01063311%
		Tract Total:	640.000	100.00000000%	
12	Section 33-T142N-R83W	Square Butte Electric Cooperative	3.900	0.60937500%	0.02063142%
		Minnkota Power Cooperative, Inc.	625.040	97.66250000%	3.30652819%
		ALLETE, INC.	11.060	1.72812500%	0.05850858%
		Tract Total:	640.000	100.00000000%	
13	Section 32-T142N-R83W	Minnkota Power Cooperative, Inc.	465.830	72.78593750%	2.46429033%
		Heirs or Devises of Alex Sorge, deceased	80.000	12.50000000%	0.42320852%

		Darlene Voegele	37.470	5.85468750%	0.19822029%
		BNI Coal, Ltd.	56.700	8.85937500%	0.29994904%
		Tract Total:	640.000	100.00000000%	
14	Section 31-T142N-R83W	Robert Reinke	456.910	70.56743065%	2.41710258%
		Darlene Voegele	149.640	23.11113857%	0.79161154%
		BNI Coal, Ltd.	40.930	6.32143078%	0.21652406%
		Tract Total:	647.480	100.00000000%	
15	Section 36-T142N-R84W	State of North Dakota			
		Board of University and School Lands	320.000	100.00000000%	1.69283409%
		Tract Total:	320.000	100.00000000%	
16	Section 35-T142N-R84W	Michael P. Dresser	80.000	100.00000000%	0.42320852%
		Tract Total:	80.000	100.00000000%	
17	Section 2-T141N-R84W	City of Center Park District	46.050	10.68544545%	0.24360941%
		Barry A. Berger and Carrie Berger	286.460	66.47020605%	1.51540392%
		Dwight Wrangham and Linda Wrangham	3.000	0.69612029%	0.01587032%
		BNI Coal, Ltd.	95.450	22.14822721%	0.50494067%
		Tract Total:	430.960	100.00000000%	
18	Section 1-T141N-R84W	Jolene Berger	627.320	97.93917442%	3.31858963%
		Travis Klatt and Jessica Klatt	8.310	1.29738338%	0.04396079%
		Gary Leinius	4.890	0.76344220%	0.02586862%
		Tract Total:	640.520	100.00000000%	
19	Section 6-T141N-R83W	Brian Reinke	19.577	3.02274377%	0.10356336%
		Benjamin Reinke	30.997	4.78601096%	0.16397532%
		Elizabeth Wagendorf	30.997	4.78601096%	0.16397532%
		Jolene Berger	245.840	37.95877403%	1.30051979%
		Gary Leinius	320.240	49.44646028%	1.69410372%
		Tract Total:	647.650	100.00000000%	
20	Section 5-T141N-R83W	Minnkota Power Cooperative, Inc.	641.12000000	99.92518703%	3.39159310%
		Square Butte Electric Cooperative	0.48000000	0.07481297%	0.00253925%
		Tract Total:	641.600	100.00000000%	
21	Section 4-T141N-R83W	Square Butte Electric Cooperative	3.820	0.59499704%	0.02020821%
		Minnkota Power Cooperative, Inc.	638.200	99.40500296%	3.37614599%
		Tract Total:	642.020	100.00000000%	

22	Section 3-T141N-R83W	Minnkota Power Cooperative, Inc. Alan Schwalbe Tract Total:	7.720 634.240 641.960	1.20256714% 98.79743286% 100.00000000%	0.04083962% 3.35519717%
23	Section 2-T141N-R83W	Carl Schwalbe Rolland Schwalbe Loren Schwalbe Tract Total:	214.347 214.347 214.347 643.041	33.33333333% 33.33333333% 33.33333333% 100.00000000%	1.13391846% 1.13391846% 1.13391846%
24	Section 1-T141N-R83W	Carl Schwalbe Rolland Schwalbe Loren Schwalbe Tract Total:	26.667 26.667 26.667 80.000	33.33333333% 33.33333333% 33.33333334% 100.00000000%	0.14106951% 0.14106951% 0.14106951%
25	Section 12-T141N-R83W	Richard A. Schwalbe and Lila M. Schwalbe Tract Total:	160.000 160.000	100.00000000% 100.00000000%	0.84641705%
26	Section 11-T141N-R83W	Alan Schwalbe Julie Hatzenbihler Rodney J. Hatzenbihler Nancy Henke Bonnie Schwab Peggy Gobar Annette Hatzenbihler Brent Hatzenbihler Randy Hatzenbihler Tract Total:	480.000 15.000 15.000 15.000 15.000 15.000 15.000 15.000 15.000 600.000	80.00000000% 2.50000000% 2.50000000% 2.50000000% 2.50000000% 2.50000000% 2.50000000% 2.50000000% 2.50000000% 100.00000000%	2.53925114% 0.07935160% 0.07935160% 0.07935160% 0.07935160% 0.07935160% 0.07935160% 0.07935160% 0.07935160%
27	Section 10-T141N-R83W	Alan Schwalbe Minnkota Power Cooperative, Inc. Delmar Hagerott Tract Total:	237.840 2.160 400.000 640.000	37.16250000% 0.33750000% 62.50000000% 100.00000000%	1.25819894% 0.01142663% 2.11604261%
28	Section 9-T141N-R83W	Minnkota Power Cooperative, Inc. Tract Total:	640.000 640.000	100.00000000% 100.00000000%	3.38566818%
29	Section 8-T141N-R83W	BNI Coal, Ltd. Minnkota Power Cooperative, Inc. Five D's, LLP Tract Total:	161.000 160.000 319.000 640.000	25.15625000% 25.00000000% 49.84375000% 100.00000000%	0.85170715% 0.84641705% 1.68754398%

30	Section 7-T141N-R83W	Janet K. Dohrmann and L. J. Dohrmann, Trustees of the Janet and L. J. Dohrmann Revocable Trust	328.460	50.65231471%	1.73758839%
		Gary Leinius	320.000	49.34768529%	1.69283409%
		Tract Total:	648.460	100.00000000%	
31	Section 12-T141N-R84W	Jolene Berger	160.00000000	25.00000000%	0.84641705%
		Brian Dresser	320.00000000	50.00000000%	1.69283409%
		Frances Fuchs	160.00000000	25.00000000%	0.84641705%
		Tract Total:	640.000	100.00000000%	
32	Section 13-T141N-R84W	Mark Leischner and Susan Leischner	280.000	100.00000000%	1.48122983%
		Tract Total:	280.000	100.00000000%	
33	Section 18-T141N-R83W	Janet K. Dohrmann and L.J. Dohrmann, as Trustees of The Janet and L.J. Fast Revocable Trust	123.820	19.12100809%	0.65502099%
		Wayne Reuther	33.957	5.24378693%	0.17963438%
		Kent Reuther	33.957	5.24378693%	0.17963438%
		Keith Reuther	33.957	5.24378693%	0.17963438%
		Karen Shulz	33.957	5.24378693%	0.17963438%
		Jerald Reuther	33.957	5.24378693%	0.17963438%
		Martha Reuther	33.957	5.24378693%	0.17963438%
		Larry F. Schmidt and Virginia Schmidt	320.000	49.41627031%	1.69283409%
		Tract Total:	647.560	100.00000000%	
34	Section 17-T141N-R83W	Five D's LLP	320.000	50.00000000%	1.69283409%
		Jerald O. Reuther	79.698	12.45286458%	0.42161267%
		Wayne A. Reuther	53.333	8.33333333%	0.28213902%
		Karen L. Reuther	26.667	4.16666667%	0.14106951%
		Jeanette M. Reuther	0.302	0.04713542%	0.00159585%
		Larry F. Schmidt and Virginia Schmidt	160.000	25.00000000%	0.84641705%
		Tract Total:	640.000	100.00000000%	
35	Section 16-T141N-R83W	Larry F. Schmidt and Virginia Schmidt	160.000	25.00000000%	0.84641705%
		BNI Coal, Ltd.	160.000	25.00000000%	0.84641705%
		Oliver County	2.510	0.39218750%	0.01327817%
		State of North Dakota - Dept. of Trust Lands Attn: Commissioner of University and School Lands	317.490	49.60781250%	1.67955592%
		Tract Total:	640.000	100.00000000%	
36	Section 15-T141N-R83W	Delmar Hagerott	240.000	100.00000000%	1.26962557%
		Tract Total:	240.000	100.00000000%	

37	Section 14-T141N-R83W	Alan Schwalbe	190.000	100.00000000%	1.00512024%
		Tract Total:	190.000	100.00000000%	
38	Section 21-T141N-R83W	Douglas D. Doll and Deberra K. Doll	100.000	22.72727273%	0.52901065%
		James D. Pazdernik and Bonita Pazdernik	100.000	22.72727273%	0.52901065%
		Anton Pflieger and Helen Pflieger	160.000	36.36363636%	0.84641705%
		Delmar Hagerott	80.000	18.18181818%	0.42320852%
		Tract Total:	440.000	100.00000000%	
39	Section 20-T141N-R83W	Douglas D. Doll and Deberra K. Doll	80.000	25.00000000%	0.42320852%
		James D. Pazdernik and Bonita Pazdernik	80.000	25.00000000%	0.42320852%
		Dale P. Pfliger and Judy Pfliger	80.000	25.00000000%	0.42320852%
		Thomas Pfliger	80.000	25.00000000%	0.42320852%
		Tract Total:	320.000	100.00000000%	
40	Section 19-T141N-R83W	Winfried Keller	120.000	49.59497438%	0.63481278%
		Jerald Reuther	23.684	9.78839478%	0.12529088%
		Wayne Reuther	23.684	9.78839478%	0.12529088%
		Kent Reuther	23.684	9.78839478%	0.12529088%
		Keith Reuther	27.224	11.25144652%	0.14401786%
		Karen Shulz	23.684	9.78839478%	0.12529088%
		Tract Total:	241.960	100.00000000%	
Total Acres:			18903.211	Total Participation:	100.00000000%

EXHIBIT C

Tract Participation Factors

Attached to and made part of the Storage Agreement
Tundra Deadwood - Secure Geological Storage
Oliver County, North Dakota

<u>Tract No.</u>	<u>Acres</u>	<u>Tract Participation Factor</u>
1	160.000	0.84641705%
2	480.000	2.53925114%
3	240.000	1.26962557%
4	40.000	0.21160426%
5	440.000	2.32764687%
6	640.000	3.38566818%
7	640.000	3.38566818%
8	560.000	2.96245966%
9	200.000	1.05802131%
10	560.000	2.96245966%
11	640.000	3.38566818%
12	640.000	3.38566818%
13	640.000	3.38566818%
14	647.480	3.42523818%
15	320.000	1.69283409%
16	80.000	0.42320852%
17	430.960	2.27982431%
18	640.520	3.38841904%
19	647.650	3.42613750%
20	641.600	3.39413235%
21	642.020	3.39635420%
22	641.960	3.39603679%
23	643.041	3.40175539%
24	80.000	0.42320852%
25	160.000	0.84641705%
26	600.000	3.17406392%
27	640.000	3.38566818%
28	640.000	3.38566818%
29	640.000	3.38566818%
30	648.460	3.43042248%
31	640.000	3.38566818%
32	280.000	1.48122983%
33	647.560	3.42566139%
34	640.000	3.38566818%
35	640.000	3.38566818%
36	240.000	1.26962557%
37	190.000	1.00512024%
38	440.000	2.32764687%
39	320.000	1.69283409%
40	241.960	1.27999418%
Total:	18903.211	100.00000000%

EXHIBIT D

Surface Use And Pore Space Lease
Attached to and made part of the Storage Agreement
Tundra Deadwood
Oliver County, North Dakota

SURFACE USE AND PORE SPACE LEASE

THIS SURFACE USE AND PORE SPACE LEASE ("**Lease**") is made, entered into, and effective as of the _____ day of _____, 2020 ("**Effective Date**") by and between _____, whose address is _____ (whether one or more, "**Lessor**"), and Minnkota Power Cooperative, Inc., a Minnesota cooperative association, whose address is _____ (whether one or more, "**Lessee**"). Lessor and Lessee are sometimes referred to in this Lease individually as a "**Party**" and collectively as the "**Parties**."

1. DEFINITIONS. The following terms shall have the following meanings in this Lease:

"**Carbon Dioxide**" means carbon dioxide in gaseous, liquid, or supercritical fluid state together with incidental associated substances derived from the source materials, capture process and any substances added or used to enable or improve the injection process.

"**Commencement of Operations**" means the date on which Carbon Dioxide is first injected into a Reservoir for commercial operations under this Lease, provided that the performance of test injections and related activities shall not be deemed Commencement of Operations.

"**Commission**" means the North Dakota Industrial Commission.

"**Completion Notice**" means a certificate of project completion issued to Lessee by the Commission pursuant to Chapter 38-22 of the North Dakota Century Code.

"**Environmental Attributes**" means any and all credits, benefits, emissions reductions, offsets, and allowances, howsoever entitled, attributable to the Operations, including any avoided emissions and the reporting rights related to these avoided emissions, such as 26 U.S.C. §45Q Tax Credits.

"**Environmental Incentives**" means any and all credits, rebates, subsidies, payments or other incentives that relate to the use of technology incorporated into the Operations, environmental benefits of Operations, or other similar programs available from any regulated entity or any Governmental Authority.

"**Facilities**" means all facilities, structures, improvements, fixtures, equipment, and any other personal property at any time acquired or constructed by or for Lessee that are necessary or desirable in connection with any use of Reservoirs and their Formations or Operations, including without limitation wells, pipelines, roads, utilities, metering or monitoring equipment, and buildings.

"**Financing Parties**" means person or persons providing construction or permanent financing to Lessee in connection with construction, ownership, operation and maintenance of Facilities or Operations, including financial institutions, leasing companies, institutions, tax equity partners, joint venture partners and/or private lenders.

"**Formation**" means the geological formation of which any Reservoir is a part.

"**Hazardous Substance**" means any chemical, waste or other substances, expressly excluding Carbon Dioxide and Non-Native Carbon Dioxide, (a) which now or hereafter becomes defined as or included in the definition of "hazardous substances," "hazardous wastes," "hazardous materials," "extremely hazardous wastes," "restricted hazardous wastes," "toxic substances," "toxic pollutants," "pollutions," "pollutants," "regulated substances," or words of similar import under any law

pertaining to environment, health, safety or welfare, (b) which is declared to be hazardous, toxic or polluting by any Governmental Authority, (c) exposure to which now or hereafter prohibited, limited or regulated by any Governmental Authority, (d) the storage, use, handling, disposal or release of which is restricted or regulated by any Governmental Authority, or (e) for which remediation or cleanup is required by any Governmental Authority.

“Leased Premises” means the surface and subsurface of the land, excluding mineral rights, described in Exhibit A of this Lease.

“Native Oil and Gas” means all oil, natural gas, and other hydrocarbons present in and under the Leased Premises and not injected by Lessor, Lessee or any third party.

“Non-Native Carbon Dioxide” means Carbon Dioxide that is not naturally occurring in the Reservoir together with incidental associated substances, fluids, minerals, oil, and gas, excluding that which, independent of Operations, originates from an accumulation meeting the definition of a Pool. All Non-Native Carbon Dioxide will be considered personal property of the Lessee and its successor and assigns under this Agreement.

“Operating Year” means the calendar year or portion of the calendar year following Commencement of Operations during which Operations occur.

“Operations” means the transportation and injection of Carbon Dioxide into a Reservoir after Commencement of Operations, and any withdrawal of this Carbon Dioxide, as well as the withdrawal of Non-Native Carbon Dioxide, for sale or disposal in accordance with applicable law.

“Option Money” means 20 percent of the Initial Term Payment (as such term is defined in that certain Option to Lease between Lessor and Lessee with respect to the Leased Premises).

“Pool” means an underground Reservoir containing a common accumulation of Native Oil and Gas that is economically recoverable. A zone of a structure that is completely separated from any other zone in the same structure is a Pool.

“Pore Space” means a cavity or void, whether natural or artificially created, in a Reservoir.

“Related Person” means any member, partner, principal, officer, director, shareholder, predecessor-in-interest, successor-in-interest, employee, agent, heir, representative, contractor, lessee, sublessee, licensee, invitee, permittee of a Party, Financing Parties or any other person or entity that has obtained or in future obtains rights or interests from, under or through a Party (excluding the other Party itself).

“Reservoir” means any subsurface stratum, sand, formation, aquifer, cavity or void, whether natural or artificially created, wholly or partially within the Leased Premises, suitable for the storage or sequestration of carbon dioxide or other gaseous substances.

“Storage Fee” means Lessor’s proportionate share of sixteen cents (\$0.16) per metric ton of Carbon Dioxide (“Storage Rate”) as determined by the Lessee’s last meter before injection as part of Operations. For injection periods after 2026, the Storage Rate shall be adjusted to an amount equal to the product of sixteen cents (\$0.16) and the inflation adjustment factor for such calendar year. The inflation adjustment factor shall be determined in the same manner as provided in 26 U.S.C. §45Q(f)(7)(B), substituting “2026” for “2008”. The Storage Fee shall be: (i) calculated separately for each amalgamated area as created and established by the Commission that includes any portion of the Leased Premises; (ii) limited to the Carbon Dioxide injected in said amalgamated area in the immediately preceding Operating Year; and (iii) based on the Lessor’s proportionate per net acre share of said unit. For avoidance of doubt, the Lessor shall receive a separate Storage Fee for each amalgamated area created and established by the Commission that includes any portion of the Leased Premises on a net acre basis within the Lessor’s interest being the numerator and the acres in the amalgamated area being the denominator.

“Tax Credits” means any and all (a) investment tax credits, (b) production tax credits, (c)

credits under 26 U.S.C. §45Q credits, and (d) similar tax credits or grants under federal, state or local law relating to construction, ownership or Operations

2. LEASE RIGHTS. In consideration of the compensation, covenants, agreements, and conditions set forth in this Lease, Lessor grants, demises, leases and lets to Lessee the exclusive right to use all Pore Space, Reservoirs and their Formations in the Leased Premises for any purpose not previously granted or reserved by an instrument of record related to the capture, injection, storage, sequestration, sale, withdrawal or disposal of Carbon Dioxide, Non-Native Carbon Dioxide and incidental associated substances, fluids, and minerals, provided that Lessee shall have no right to use potable water from within the Leased Premises in Operations; together with the following exclusive rights:

(a) to use the Leased Premises for developing, constructing, installing, improving, maintaining, replacing, repowering, relocating, removing, abandoning in place, expanding, and operating Facilities;

(b) to lay, maintain, replace, repair, and remove roads on the Leased Premises to allow Lessee, in its sole discretion, to exercise its rights under this Lease; and

(c) to enter upon and use the Leased Premises for the purposes of conducting:

(i) any investigations, studies, surveys, and tests, including without limitation drilling and installing test wells and monitoring wells, seismic testing, and other activities as Lessee deems necessary or desirable to determine the suitability of the Leased Premises for Operations,

(ii) any inspections and monitoring of Reservoirs and Carbon Dioxide as Lessee or any governmental authority deems necessary or desirable during the term of this Lease, and

(iii) any maintenance to the Facilities that Lessee or any governmental authority deems necessary or as required by applicable law.

Lessor also hereby grants and conveys unto Lessee all other and further easements across, over, under and above the Leased Premises as reasonably necessary to provide access to and services reasonably required for Lessee's performance under the Lease. The easements granted hereunder shall run with and burden the Leased Premises for the term of this Lease. Notwithstanding the surface easements granted herein, Lessee shall provide notice to Lessor prior to accessing the surface of the Property, and if such activity requires permit then prior notice shall be in form and not be less than that required by law or rule.

Lessee may exercise its rights under this Lease in conjunction with related operations on other properties near the Leased Premises. Lessee shall have no obligation, express or implied, to begin, prosecute or continue storage operations in, upon or under the Leased Premises, or to store and/or sell or use all or any portion of the gaseous substances stored thereon. The timing, nature, manner and extent of Lessee's operations, if any, under this Lease shall be at the sole discretion of Lessee. All obligations of Lessee are expressed herein, and there shall be no covenants implied under this Lease, it being agreed that all amounts paid hereunder constitute full and adequate consideration for this Lease.

3. INITIAL TERM. This Lease shall commence on the Effective Date and shall continue for an initial term of twenty (20) years ("Initial Term") unless sooner terminated in accordance with the terms of this Lease. Lessee may, but is not obligated to, extend the Initial Term for up to four successive five-year periods by paying Lessor \$25.00 per net acre in the Leased Premises per five-year extension on or prior to the last day of the Initial Term or expiring five-year extension period. The Initial Term together with any extensions are referred to as the "Primary Term."

4. OPERATIONAL TERM. Upon Commencement of Operations at any time during the Primary Term, this Lease shall continue for so long as any portion of the Leased Premises or

Lessee's Facilities are subject to a permit issued by the Commission or under the ownership or control of the State of North Dakota ("Operational Term"); *provided, however*, that all of Lessee's obligations under this Lease shall terminate upon issuance of a Completion Notice, except for payment of the Final Royalty Payment (as applicable), and Final Occupancy Fee (as applicable). If Commencement of Operations does not occur during the Primary Term, this Lease shall terminate, and Lessee shall execute a document evidencing termination of this Lease in recordable form and shall record it in the official records of the county in which the Leased Premises is located.

5. COMPENSATION.

(a) **Initial Term Payment.** Lessee shall pay to Lessor the greater of \$50.00 per net acre in the Leased Premises ("Initial Term Payment") or a one-time flat \$500.00 payment, the receipt and sufficiency of which are hereby acknowledged.

(b) **Royalty.** During the Operational Term, Lessee shall annually on or before May 31st pay to Lessor a royalty equal to the greater of a flat \$100.00 payment or the Storage Fee(s) for the immediately preceding Operating Year. For the Operating Year in which Lessee provides Lessor with a Completion Notice, Lessee shall pay a pro rata share of the Storage Fee(s) ("Final Royalty Payment"), as applicable, and said payment shall be made within sixty days after the date the Completion Notice was issued.

(c) **Occupancy Fee.** Within sixty days of the anniversary of the Effective Date after which any Facilities are installed or used, Lessee shall pay Lessor, as applicable, a one-time fee of (i) \$3,000.00 per net surface acre of the Leased Premises occupied by Facilities (excluding pipelines), and (ii) \$1.50 for each linear foot of pipeline in place on the Leased Premises. For the year in which Lessee provides Lessor with a Completion Notice, Lessee shall pay any fees owed pursuant to this provision ("Final Occupancy Fee") within sixty days after the date the Completion Notice was issued.

Lessor and Lessee agree that the Lease shall continue as specified herein even in the absence of Operations and the payment of royalties.

6. **AMALGAMATION.** (a) Lessee, in its sole discretion, shall have the right and power, at any time (including both before and after Commencement of Operations), to pool, unitize, or amalgamate any Reservoir or portion of a Reservoir with any other lands or interests into which that Reservoir extends and document such unit in accordance with applicable law or agency order. Amalgamated units shall be of such shape and dimensions as Lessee may elect and as are approved by the Commission. Amalgamated areas may include, but are not required to include, land upon which injection or extraction wells have been completed or upon which the injection and/or withdrawal of Carbon Dioxide and Non-Native Carbon Dioxide has commenced prior to the effective date of amalgamation. In exercising its amalgamation rights under this Lease and if required by law, Lessee shall record or cause to be recorded a copy of the Commission's amalgamation order or other notice thereof in the county in which the amalgamated unit. Amalgamating in one or more instances shall, if approved by the Commission, not exhaust the rights of Lessee to amalgamate Reservoirs or portions of Reservoirs into other amalgamation areas, and Lessee shall have the recurring right to revise any amalgamated area formed under this Lease by expansion or contraction or both. Lessee may dissolve any amalgamated area at any time and document such dissolution by recording an instrument in accordance with applicable law or agency order. Lessee shall have the right to negotiate, on behalf of and as agent for Lessor, any unit agreements and operating agreements with respect to the operation of any amalgamated areas formed under this Lease.

(b) The injection and/or withdrawal of Carbon Dioxide and Non-Native Carbon Dioxide into a Reservoir from any property within a amalgamated area that includes the Leased Premises shall be treated as if Operations were occurring on the Leased Premises, except that the royalty payable to Lessor under Section 5(b) of this Lease shall be Lessor's per net acre proportionate share of the total Storage Fee for the preceding Operating year's injection of Carbon Dioxide into the amalgamated area.

7. **ENVIRONMENTAL INCENTIVES.** Unless otherwise specified, Lessee is the owner of all

Environmental Attributes and Environmental Incentives and is entitled to the benefit of all Tax Credits or any other attributes of ownership of the Facilities and Operations. Lessor shall cooperate with Lessee in obtaining, securing and transferring all Environmental Attributes and Environmental Incentives and the benefit of all Tax Credits. Lessor shall not be obligated to incur any out-of-pocket costs or expenses in connection with such actions unless reimbursed by Lessee. If any Environmental Incentives are paid directly to Lessor, Lessor shall immediately pay such amounts over to Lessee.

8. SURRENDER OF LEASED PREMISES. Lessee shall have the unilateral right at any time and from time to time to execute and deliver to Lessor a written notice of surrender and/or release covering all or any part of the Leased Premises for which the subsurface pore space is not being utilized for storage as set forth herein, and upon delivery of such surrender and/or release to Lessor this Lease shall terminate as to such lands, and Lessee shall be released from all further obligations and duties as to the lands so surrendered and/or released, including, without limitation, any obligation to make payments provided for herein, except obligations accrued as of the date of the surrender and/or release.

9. FACILITIES.

- (a) Lessee shall in good faith consult with Lessor regarding the location of the Facilities, selection of the Facilities location shall be within the discretion of the Lessee with consent of the Lessor, not to be unreasonably withheld. The withholding of such consent by the Lessor regarding the location of the Facilities shall be deemed "unreasonable" if the proposed location of the Facility is located more than 500 feet from any occupied dwellings or currently used buildings existing on the Leased Premises as of the Effective Date. Notwithstanding the foregoing, in no event shall Facilities be located within 500 feet of any currently occupied dwelling or currently used building existing on the Leased Premises as of the Effective Date without Lessor's express consent. Lessee may erect fences around all or part of any aboveground Facilities (excluding roads) to separate Facilities from adjacent Lessor-controlled lands, and shall do so if Lessor so requests. Lessee shall maintain and repair at its expense any roads it constructs on the Leased Premises in reasonably safe and usable condition.
- (b) Lessor and Lessee agree that all Facilities and property of whatever kind and nature constructed, placed or affixed on the rights-of-way, easements, patented or leased lands as part of Lessee's Operations, as against all parties and persons whomsoever (including without limitation any party acquiring interest in the rights-of-way, easements, patented or leased lands or any interest in or lien, claim or encumbrance against any of such Facilities), shall be deemed to be and remain the property of the Lessee, and shall not be considered to be fixtures or a part of the Leased Premises. Lessor waives, to the fullest extent permitted by applicable law, any and all rights it may have under the laws of the State of North Dakota, arising under this Lease, by statute or otherwise to any lien upon, or any right to distress or attachment upon, or any other interest in, any item constituting the Facilities or any other equipment or improvements constructed or acquired by or for Lessee and located on the leased Premises or within any easement area. Each Lessor and Lessee agree that the Lessee (or the designated assignee of Lessee or Financing Parties) is the tax owner of any such Facilities, structures, improvements, equipment and property of whatever kind and nature and all tax filings and reports will be filed in a manner consistent with this Lease. Facilities shall at all times retain the legal status of personal property as defined under Article 9 of the Uniform Commercial Code. If there is any mortgage or fixture filing against the Premises which could reasonably be construed as prospectively attaching to the Facilities as a fixture of the Premises, Lessor shall provide a disclaimer or release from such lienholder. Lessor, as fee owner, consents to the filing of a disclaimer of the Facilities as a fixture of the Premises in the Oliver County Recorder's Office, or where real estate records of Oliver County are customarily filed.

10. SURFACE DAMAGE COMPENSATION ACT. The compensation contemplated and paid to Lessor hereunder is compensation for, among other things, damages sustained by Lessor for the lost use of and access to Lessor's land, pore space (to the extent required under North Dakota law), and any other damages which are contemplated under Ch. 38-11.1 of the North Dakota Century Code (to the extent applicable).

11. MINERALS, OIL AND GAS. This Lease is not intended to grant or convey, nor does it grant or convey, any right to or obligation for Lessee to explore for or produce minerals, including Native Oil and Gas, that may exist on the Leased Premises. Lessee shall not engage in any activity or permit its Related Persons to engage in any activity that unreasonably interferes with the Lessor's or third party's (or parties') rights to the granted, leased, or reserved mineral interests. If Lessor owns hydrocarbon mineral interests in the Leased Premises and Lessee should inadvertently discover a Pool in conjunction with its efforts to explore for and develop a Reservoir for Operations, Lessee shall inform Lessor within 60 days of discovery. If Lessee determines that it will not use in conjunction with Operations a well that has encountered a Pool within the Leased Premises, Lessor shall have the option but not the obligation to buy such well at cost, provided Lessor has the ability and assumes all permits and risks and liabilities which are associated with the ownership and operation of an oil, gas or mineral well.

12. FORCE MAJEURE. Should Lessee be prevented from complying with any express or implied covenant of this Lease, from utilizing the Leased Premises for underground storage purposes by reason of scarcity of or an inability to obtain or to use equipment or material failure or breakdown of equipment, or by operation of force majeure (including, but not limited to, riot, insurrection, war (declared or not), mobilization, explosion, labor dispute, fire, flood, earthquake, storm, lightning, tsunami, backwater caused by flood, vandalism, act of the public enemy, terrorism, epidemic, pandemic (including COVID-19), civil disturbances, strike, labor disturbances, work slowdown or stoppage, blockades, sabotage, labor or material shortage, national emergency, and the amendment, adoption or repeal of or other change in, or the interpretation or application of, any applicable laws, orders, rules or regulations of governmental authority), then while so prevented, Lessee's obligation to comply with such covenant shall be suspended and this Lease shall be extended while and so long as Lessee is prevented by any such cause from utilizing the property for underground storage purposes and the time while Lessee is so prevented shall not be counted against Lessee, anything in this Lease to the contrary notwithstanding.

13. DEFAULT/TERMINATION. Lessor may not terminate the Lease for any reason whatsoever unless a Default Event has occurred and is continuing consistent with the terms of this Section 13. Any Party that fails to perform its responsibilities as listed below shall be deemed to be the "Defaulting Party," the other Party shall be deemed to be the "Non-Defaulting Party," and each event of default shall be a "Default Event." A Default Event is: (a) failure of a Party to pay any amount due and payable under this Lease, other than an amount that is subject to a good faith dispute, within thirty (30) days following receipt of written notice from Non-Defaulting Party of such failure to pay; or (b) a material violation or default of any terms of this Lease by a Party, provided the Non-Defaulting Party provides written notice of violation or default and Defaulting Party fails to substantially cure the violation or default within sixty (60) days after receipt of said notice to cure such violations or defaults. Parties acknowledge that in connection with any construction or long-term financing or other credit support provided to Lessee or its affiliates by Financing Parties, that such Financing Parties may act to cure a continuing Default Event and Lessor agrees to accept performance from any such Financing Parties so long as such Financing Parties perform in accordance with the terms of this Lease. If Lessee, its affiliates or Financing Parties, fail to substantially cure such Default Event within the applicable cure period, Lessor may terminate the Lease. Lessee may terminate the lease with thirty (30) days written notice to Lessor. Upon termination of this Lease, Lessee shall have one hundred eighty (180) days to remove, plug, and/or abandon in place all Facilities of Lessee located on the Leased Premises in accordance with applicable permit requirements or other applicable statutes, rules or regulations.

14. ASSIGNMENT. (a) Lessor shall not sell, transfer, assign or encumber the Facilities or any part of Operations, Lessee's title or Lessee's rights under this Lease. (b) Lessee has the right to sell,

assign, mortgage, pledge, transfer, use as collateral, or otherwise collaterally assign or convey all or any of its rights under this Lease, including, without limitation, an assignment by Lessee to Financing Parties. (c) In the event Lessee assigns its rights under this Lease, Lessee shall be relieved of all obligations with respect to the assigned portion arising after the date of assignment so long as notice of such assignment is provided to Lessor, and provided that Lessee shall not be relieved from any obligation in respect of any payment or other obligations that have not been satisfied or performed prior to such date of assignment. (d) This Lease shall be binding on and inure to the benefit of the successors and assignees. The assigning Party shall provide written notice of any assignment within sixty (60) days after such assignment has become effective; provided, however, that an assigning Party's failure to deliver written notice of assignment within such 60-day period shall not be deemed a breach of this Lease unless such failure is willful and intentional. Further, no change or division in Lessor's ownership of or interest in the Leased Premises or royalties shall enlarge the obligations or diminish the rights of Lessee or be binding on Lessee until after Lessee has been furnished with a written assignment or a true copy of the assignment with evidence that same has been recorded with the Oliver County Recorder's Office.

15. FINANCING. (a) Lessor acknowledges that Lessee may obtain tax equity, construction, long-term financing and other credit support from one or more Financing Parties and that Lessee intends to enter into various agreements and execute various documents relating to such financing, which documents may, among other things, assign this Lease and any related easements to a Financing Party, grant a sublease in the Leased Premises and a lease of the Facilities from such Financing Party to Lessee, grant the Financing Parties a sublease or other real property interest in Lessee's interests in and to the Leased Premises, grant a first priority security interest in Lessee's interest in the Facilities and/or this Lease and Lessee's other interests in and to the Leased Premises, including, but not limited to, any easements, rights of way or similar interests (such documents, "Financing Documents"). Lessor acknowledges notice of the foregoing and consents to the foregoing actions and Financing Documents described above.

(b) Lessor agrees, to execute, and agrees to cause any and all of Lessor's lenders to execute, such commercially reasonable subordination agreements, non-disturbance agreements, forbearance agreements, consents, estoppels, modifications of this Lease and other acknowledgements of the foregoing as Lessee or the Financing Parties may reasonably request (collectively, "Lessor Financing Consent Instruments"). Lessor acknowledges and agrees that (i) Lessee's ability to obtain financing for the construction and operation of the Facilities is dependent upon the prompt cooperation of Lessor and its lenders as contemplated by this Section 15; (ii) if Lessee is unable to close on the financing for the Facilities, the construction of the Facilities and the Commencement of Operations will not likely occur; and (iii) it is in the best interest of both Lessee and Lessor for Lessee to obtain financing from the Financing Parties as contemplated by this Section 15. Therefore, Lessor agrees to act promptly, reasonably and in good faith in connection with any request for approval and execution of all Lessor Financing Consent Instruments. The Lessor shall also reasonably cooperate with the Lessee or the Financing Party in the making of any filings required by such requesting party for regulatory compliance or in accordance with applicable laws and in the operation and maintenance of the Facilities, all solely at the expense of the Lessee.

(c) As a precondition to exercising any rights or remedies as a result of any default or alleged default by Lessee under this Lease, Lessor shall deliver a duplicate copy of the applicable notice of default to each Financing Parties concurrently with delivery of such notice to Lessee, specifying in detail the alleged default and the required remedy, provided Lessor was given notice of such Financing Parties and if no such notice of default is required to be delivered to Lessee under this Lease, Lessor may not terminate this Lease unless Lessor has delivered a notice of default to each Financing Party specifying in detail the alleged default or breach and permitting each Financing Party the opportunity to cure as provided in this Section 15(c). Each Financing Party shall have the same period after receipt of a notice of default to remedy default, or cause the same to be remedied, as is given to Lessee after Lessee's receipt of a notice

of default under this Lease, plus, in each instance, the following additional time periods: (i) ten (10) Business Days in the event of any monetary default; and (ii) sixty (60) days in the event of any non-monetary default; provided, however, that (A) such sixty (60)-day period shall be extended for an additional sixty (60) days to enable such Financing Party to complete such cure, including the time required for such Financing Party to obtain possession of the Facilities (including possession by a receiver), institute foreclosure proceedings or otherwise perfect its right to effect such cure and (B) such Financing Party shall not be required to cure those defaults which are not reasonably susceptible of being cured or performed. Lessor shall accept such performance by or at the instance of a Financing Party as if the performance had been made by Lessee.

(d) If any Lessee Default Event cannot be cured without obtaining possession of all or part of the Facilities and/or the leasehold interest created by the Lease (the "Leasehold Estate"), then any such Lessee Default Event shall nonetheless be deemed remedied if: (i) within sixty (60) days after receiving the notice of default, a Financing Party acquires possession thereof, or commences appropriate judicial or non-judicial proceedings to obtain the same; (ii) such Financing Party is prosecuting any such proceedings to completion with commercially reasonable diligence; and (iii) after gaining possession thereof, such Financing Party performs all other obligations as and when the same are due in accordance with the terms of the Lease. If a Financing Party is prohibited by any process or injunction issued by any court or by reason of any action of any court having jurisdiction over any bankruptcy or insolvency proceeding involving Lessee from commencing or prosecuting the proceedings described above, then the sixty (60)-day period specified above for commencing such proceedings shall be extended for the period of such prohibition.

(e) Financing Parties shall have no obligation or liability to the Lessor for performance of the Lessee's obligations under the Lease prior to the time the Financing Party acquires title to the Leasehold Estate. A Financing Party shall be required to perform the obligations of the Lessee under this Lease only for and during the period the Financing Party directly holds such Leasehold Estate. Any assignment pursuant to this Section 15 shall release the assignor from obligations accruing under this Lease after the date the liability is assumed by the assignee.

(f) Each Financing Party shall have the absolute right to do one, some or all of the following things: (i) assign the rights, mortgage or pledge held by Financing Party (the "Financing Party's Lien"); (ii) enforce the Financing Party's Lien; (iii) acquire title (whether by foreclosure, assignment in lieu of foreclosure or other means) to the Leasehold Estate; (iv) take possession of and operate the Facilities or any portion thereof and perform any obligations to be performed by Lessee under the Lease, or cause a receiver to be appointed to do so; (v) assign or transfer the Leasehold Estate to a third party; or (vi) exercise any rights of Lessee under this Lease. Lessor's consent shall not be required for any of the foregoing; and, upon acquisition of the Leasehold Estate by a Financing Party or any other third party who acquires the same from or on behalf of the Financing Party or any purchaser who purchases at a foreclosure sale, Lessor shall recognize the Financing Party or such other party (as the case may be) as Lessee's proper successor, and this Lease shall remain in full force and effect.

(g) If this Lease is terminated for any reason whatsoever, including a termination by Lessor on account of a Lessee Default Event, or if this Lease is rejected by a trustee of Lessee in a bankruptcy or reorganization proceeding or by Lessee as a debtor-in-possession (whether or not such rejection shall be deemed to terminate this Lease), if requested by Financing Party, Lessor shall execute a new lease (the "New Lease") for the Leased Premises with the Financing Parties (or their designee(s), if applicable) as Lessee, within thirty (30) days following the date of such request. The New Lease shall be on substantially the same terms and conditions as are in this Lease (except for any requirements or conditions satisfied by Lessee prior to the termination or rejection). Upon execution of the New Lease by Lessor, Financing Parties (or their designee, if applicable) shall pay to Lessor any and all sums owing by Lessee under this Lease that are unpaid and that would, at the time of the execution of the New Lease, be due and payable under this Lease if this Lease had not been terminated or rejected. The provisions of this Section 15(g) shall survive any termination of this Lease prior to the expiration of the Term, and any

rejection of this Lease in any bankruptcy or reorganization proceeding.

(h) Lessor consents to each Financing Party's security interest, if any, in the Facilities and waives all right of levy for rent and all claims and demands of every kind against the Facilities, such waiver to continue so long as any sum remains owing from Lessee to any Financing Parties. Lessor agrees that the Facilities shall not be subject to distraint or execution by, or to any claim of, Lessor.

16. INDEMNIFICATION; WAIVER. (a) Each Party shall indemnify, defend, and hold harmless the other Party and its Related Persons from and against any and all third-party suits, claims, or damages suffered or incurred by the indemnified Party and its Related Persons arising out of physical damage to property and physical injuries to any person, including death, caused by the indemnifying Party or its Related Persons except to the extent such claims arise out of the negligence or willful misconduct of the indemnified Party or its Related Persons. (b) Each Party shall indemnify, defend and hold harmless the other Party and its Related Persons from and against all suits, claims, or damages suffered or incurred by the indemnified Party and its Related Persons arising out of or relating to the existence at, on, above, below or near the Leased Premises of any Hazardous Substance, except to the extent deposited, spilled or otherwise caused by the indemnified Party or any of its contractors or agents, provided that Lessee shall not be obligated to indemnify Lessor with respect to any Hazardous Substance on the Leased Premises prior to the Effective Date.

17. INSURANCE. Lessee shall, at its sole cost and expense, keep and maintain in force commercial general liability insurance including broad form property damage liability, personal injury liability, and contractual liability coverage, on an "occurrence" basis, with a combined single limit, which may be effected by primary and excess coverage, of not less than Five Million Dollars (\$5,000,000.00) during the primary term, except that such limit in the Primary Term shall be instead not less than One Million Dollars (\$1,000,000.00) until such time as Lessee commences physical testing of any injection wells or other similar commercial activities, with such commercially reasonable deductibles as Lessee, in its discretion, may deem appropriate. Lessor shall be named as an additional insured in such policy but only to the extent of the liabilities specifically assumed by the Lessee under this Lease. The policy shall contain provisions by which the insurer waives any right of subrogation it may have against Lessor and shall be endorsed to provide that the insurer shall give Lessor thirty days written notice before any material modification or termination of coverage. Upon Lessor's request, Lessee shall promptly deliver certificates of such insurance to Lessor.

18. MISCELLANEOUS.

(a) **Confidentiality.** Lessor shall maintain in the strictest confidence, and shall require each of Lessor's Related Persons to hold and maintain in the strictest confidence, for the benefit of Lessee, all information pertaining to the compensation paid under this Lease, any information regarding Lessee and its business, operations on the Leased Premises or on any other lands, the capacity and suitability of the Reservoir, and any other information that is deemed proprietary or that Lessee requests or identifies to be held confidential, in each such case whether disclosed by Lessee or discovered by Lessor.

(b) **Liens.** (i) Lessee shall protect the Leased Premises from liens of every character arising from its activities on the Leased Premises, provided that Lessee may, at any time and without the consent of Lessor, encumber, hypothecate, mortgage, pledge, or collaterally assign (including by mortgage, deed of trust or personal property security instrument) all or any portion of Lessee's right, title or interest under this Lease (but not Lessor's right, title or interest in the Leased Premises), as security for the repayment of any indebtedness and/or the performance of any obligation. (ii) Lessor shall not directly or indirectly cause, create, incur, assume or allow to exist any mortgage, pledge, lien, charge, security interest, encumbrance or other claim of any nature on or with respect to the Facilities, Operations or any interest therein. Lessor shall immediately notify Lessee in writing of the existence of any such mortgage, pledge, lien, charge, security interest, encumbrance or other claim, shall promptly cause the same to be discharged and released of record without cost to Lessee, and shall indemnify the Lessee against all costs and expenses (including reasonable attorneys' fees) incurred in discharging and releasing any such

mortgage, pledge, lien, charge, security interest, encumbrance or other claim.

(c) **Warranty of Title.** Lessor represents and warrants to Lessee that Lessor is the owner in fee of the surface and subsurface pore space of the Leased Premises. Lessor hereby warrants and agrees to defend title to the Leased Premises and Lessor hereby agrees that Lessee, at its option, shall have the right to discharge any tax, mortgage, or other lien upon the Leased Premises, and in the event Lessee does so, Lessee shall be subrogated to such lien with the right to enforce the same and apply annual rental payments or any other such payments due to Lessor toward satisfying the same. At any time on or after the Effective Date, Lessee may obtain for itself and/or any Financing Party, at Lessee's expense, a policy of title insurance in a form and with exceptions acceptable to Lessee and/or such Financing Party in its sole discretion (the "Title Policies"). Lessor agrees to cooperate fully and promptly with Lessee in its efforts to obtain the Title Policies, and Lessor shall take such actions as Lessee or any Financing Party may reasonably request in connection therewith.

(d) **Conduct of Operations.** Each Party shall, at its expense, use best efforts to comply (and cause its Related Persons to comply) in all material respects with all laws applicable to its (or their) activities on the Leased Premises, provided that each Party shall have the right, in its sole discretion, to contest, by appropriate legal proceedings, the validity or applicability of any law, and the other Party shall cooperate in every reasonable way in such contest, at no out-of-pocket expense to the cooperating Party. During the Primary Term, Lessee, its agents, affiliates, servants, employees, nominees and licensees shall be entitled to: (i) apply for and obtain any necessary permits, approvals and other governmental authorizations (collectively called "Governmental Authorizations") required for the development, construction, operation and maintenance of the Project and Lessor agrees to co-operate, execute, obtain or join with Lessee in any applications or proceedings relating to the Governmental Authorizations upon Lessee's written request and at Lessee's direction, cost and expense; and (ii) apply for any approvals and permits and any zoning amendment of any area of the Leased Premises required in connection with the Project, and Lessor agrees to co-operate, execute, obtain or join with Lessee in any applications or proceedings relating to such approvals, permits and zoning amendments upon Lessee's written request and at Lessee's direction, cost and expense.

(e) **Title to Carbon Dioxide.** As between Lessor and Lessee, all right, title, interest and ownership to all Carbon Dioxide injected into any Reservoir shall belong to Lessee, as measured by corresponding Storage Fee payment to Lessor.

(f) **Hazardous Substances.** Lessee shall have no liability for any regulated hazardous substances located on the Leased Premises prior to the Effective Date or placed in, on or within the Leased Premises by Lessor or any of its Related Persons on or after the Effective Date, and nothing in this Lease shall be construed to impose upon Lessee any obligation for the removal of such regulated hazardous substances.

(g) **Interference.** Lessee shall peaceably and quietly have, hold and enjoy the Leased Premises against any person claiming by, through or under the Lessor and without disturbance by the Lessor, unless Lessee is found in default of the terms of this Lease and such default is continuing. Lessor shall not unreasonably interfere with Lessee's access to or maintenance of the Facilities or associated use of Leased Premises under this Lease; endanger the safety of Lessor, Lessee, the general public, private or personal property, or the Facilities; or install or maintain or permit to be installed or maintained vegetation, undergrowth, trees (including overhanging limbs and foliage and any trees standing which are substantially likely to fall), buildings, structures, installations, and any other obstructions which unreasonably interfere to Lessee access or use of the Facilities, Formations or Lessee's use of the Leased Premises under this Lease. Lessor shall not engage in any activity or permit its Related Persons to engage in any activity that might damage or undermine the physical integrity of any Formation or interfere with Lessee's use of the Leased Premises under this Lease, provided however that it is understood by Lessee that Lessor has no right to permit or to prohibit the exercise of any mineral rights not owned by Lessor at the time of entering into the Option to Lease between Lessor and Lessee with respect to the Leased Premises. Neither Lessee nor its agents will engage in any activity that damages existing oil, gas and

other mineral exploration and development activities occurring on the Leased Premises without first obtaining permission from the relevant mineral rights holder.

(h) **Reservations.** Lessor reserves the right to sell, lease, or otherwise dispose of any interest in the Leased Premises subject to the rights granted in this Lease and agrees that sales, leases, or other dispositions of any interest or estate in the Leased Premises shall be expressly made subject to the terms of this Lease and shall not unreasonably interfere with Lessee's rights under this Lease.

(i) **Taxes.** Lessor shall pay for all real estate taxes and other assessments levied upon the Leased Premises. Lessee shall pay any taxes, assessments, fines, fees, and other charges levied by any governmental authority against its Facilities on the Leased Premises. The Parties agree to cooperate fully to obtain any available tax refunds or abatements with respect to the Leased Premises. Lessee shall have the right to pay all taxes, assessments and other fees on behalf of Lessor and to deduct the amount so paid from other payments due to Lessor hereunder.

(j) **Amendments.** Lessee reserves the right to revise this Lease to remedy any mistakes, including correcting the names of the Parties, the legal description of the Leased Premises, or otherwise. In the event that any amendment alters the bonus and royalty payable under Section 5(a)-(b) of this Lease, the Lessee shall pay the Lessor the amount owed under the Lease as amended. Any amendments must be in writing and signed by both parties.

(k) **Remedies.** Notwithstanding anything to the contrary in this Lease, neither Party shall be liable to the other for any indirect, special, punitive, incidental or exemplary damages, whether foreseeable or not and whether arising out of or in connection with this Lease, by statute, in contract, tort, including negligence, strict liability or otherwise, and all such damages are expressly disclaimed. This provision does not limit Lessee's obligation to indemnify Lessor for third-party suits, claims, or damages under Section 16 of this Lease.

(l) **Financial Responsibility.** Lessee will comply with all applicable law regarding financial responsibility for Carbon Dioxide storage, and will post bonds or other financial guarantees as required by the government entities.

(m) **Attorneys' Fees.** If any suit or action is filed or arbitration commenced by either Party against the other Party to enforce this Lease or otherwise with respect to the subject matter of this Lease, the prevailing party shall be entitled to recover reasonable costs and attorneys' fees incurred in investigation of related matters and in preparation for and prosecution of such suit, action, or arbitration as fixed by the arbitrator or court, and if any appeal or other form of review is taken from the decision of the arbitrator or any court, reasonable costs and attorneys' fees as fixed by the court.

(n) **Representations and Warranties.** Lessor represents and warrants to Lessee the following as of the Effective Date and covenants that throughout the Term: (i) Lessor has the full right, power and authority to grant rights, interests and license as contained in this Lease. Such grant of the right, interests and license does not violate any law, ordinance, rule or other governmental restriction applicable to the Lessor or the Leased Premises and is not inconsistent with and will not result in a breach or default under any agreement by which the Lessor is bound or that affects the Leased Premises. (ii) Neither the execution and delivery of this Lease by Lessor nor the performance by Lessor of any of its obligations under this Lease conflicts with or will result in a breach or default under any agreement or obligation to which Lessor is a party or by which Lessor or the Leased Premises is bound. (iii) All information provided by Lessor to Lessee, as it pertains to the Leased Premises' physical condition, along with Lessor's rights, interests and use of the Leased Premises, is accurate in all material respects. (iv) Lessor has no actual or constructive notice or knowledge of Hazardous Substances at, on, above, below or near the Leased Premises. (v) Each of the undersigned represents and warrants that they have the authority to execute this Lease on behalf of the Party for which they are signing.

(o) **Severability.** Should any provision of this Lease be held, in a final and unappealable decision by a court of competent jurisdiction, to be either invalid, void or unenforceable, the remaining provisions

of this Lease shall remain in full force and effect, unimpaired by the holding. If the easements or other rights under this Lease are found to be in excess of the longest duration permitted by applicable law, the term of such easements or other rights shall instead expire on the latest date permitted by applicable law.

(p) **Memorandum of Lease.** This Lease shall not be recorded in the real property records. Lessee shall cause a memorandum of this Lease to be recorded in the real property records of the county in which the Leased Premises is situated. A recorded copy of said memorandum shall be furnished to Lessor within thirty (30) days of recording.

(q) **Notices.** All notices required to be given under this Lease shall be in writing, and shall be deemed to have been given upon (a) personal delivery, (b) one (1) Business Day after being deposited with FedEx or another reliable overnight courier service, with receipt acknowledgment requested, or (c) upon receipt or refused delivery deposited in the United States mail, registered or certified mail, postage prepaid, return receipt required, and addressed to the respective Party at the addresses set forth at the beginning of this Lease, or to such other address as either Party shall from time to time designate in writing to the other Party.

(r) **No Waiver.** The failure of either Party to insist in any one or more instances upon strict performance of any of the provisions of this Lease or to take advantage of any of its rights hereunder shall not be construed as a waiver of any such provision or the relinquishment of any such rights, but the same shall continue and remain in full force and effect.

(s) **Estoppels.** Either party hereto (the "Receiving Party"), without charge, at any time and from time to time, within ten (10) Business Days after receipt of a written request by the other party hereto (the "Requesting Party"), shall deliver a written statement, duly executed, certifying to such Requesting Party, or any other person, firm or entity specified by such Requesting Party: (i) that this Lease is unmodified and in full force and effect, or if there has been any modification, that the same is in full force and effect as so modified and identifying the particulars of such modification; (ii) whether or not, to the knowledge of the Receiving Party, there are then existing any offsets or defenses in favor of such Receiving Party against enforcement of any of the terms, covenants and conditions of this Lease and, if so, specifying the particulars of same and also whether or not, to the knowledge of such Receiving Party, the Requesting Party has observed and performed all of the terms, covenants and conditions on its part to be observed and performed, and if not, specifying the particulars of same; and (iii) such other information as may be reasonably requested by the Requesting Party. Any written instrument given hereunder may be relied upon by the recipient.

(t) **Counterparts.** This Lease may be executed in any number of counterparts, each of which, when executed and delivered, shall be an original, but all of which shall collectively constitute one and the same instrument.

(u) **Governing Law.** This Lease shall be governed, interpreted, and enforced in accordance with the laws of the state of North Dakota.

(v) **Further Action.** Each Party will execute and deliver all documents, provide all information, and take or forbear from all actions as may be necessary or appropriate to achieve the purposes of this Lease, including without limitation executing a memorandum of easement and all documents required to obtain any necessary government approvals.

(w) **Entire Agreement.** This Lease, into which the attached **Exhibit A** is incorporated by reference, contains the entire agreement of the Parties. There are no other conditions, agreements, representations, warranties, or understandings, express or implied.

[Remainder of page intentionally left blank. Signature page follows.]

IN WITNESS OF THE ABOVE, Lessor and Lessee have caused this Lease to be executed and delivered by their duly authorized representatives as of the Effective Date.

LESSOR:

By: _____
Print: _____

By: _____
Print: _____

LESSEE:

MINNKOTA POWER COOPERATIVE, INC.

By: _____
Print: _____
Its: _____

Exhibit A

LEGAL DESCRIPTION OF THE PROPERTY

The Leased Premises consists of the lands located in Oliver County, North Dakota that are owned by the Lessor and generally described as follows:

For purposes of calculating the royalty payable under Section 5(b) of this Lease, the Parties stipulate that the Leased Premises consists of _____ acres.

73933018.1

APPENDIX I

**STORAGE FACILITY PERMIT REGULATORY
COMPLIANCE**

STORAGE FACILITY PERMIT REGULATORY COMPLIANCE TABLE

Permit Item	NDAC Reference	Requirement	Regulatory Summary	Storage Facility Permit (Section and Page Number; see main body for reference cited)	Figure/Table Number and Description
Pore Space Amalgamation	NDCC 38-22-06 §3 & 4	3. Notice of the hearing must be given to each mineral lessee, mineral owner, and pore space owner within the storage reservoir and within one-half mile of the storage reservoir's boundaries.	a. An affidavit of mailing certifying that all pore space owners and lessees within the storage reservoir boundary and within one-half mile outside of its boundary have been notified of the proposed carbon dioxide storage project;	Minnkota Power Cooperative, Inc. (Minnkota) has identified the owners (surface and mineral), in addition, no mineral lessees or operators of mineral extraction activities are within the facility area or within one-half mile of its outside boundary. Minnkota will notify all owners of a pore space amalgamation hearing at least 45 days prior to the scheduled hearing. An affidavit of mailing will be provided to the North Dakota Industrial Commission (NDIC) to certify that these notifications were made.	Figure 1-1. Deadwood storage facility area map.
		4. Notice of the hearing must be given to each surface owner of land overlying the storage reservoir and within one-half mile of the reservoir's boundaries.	b. A map showing the extent of the pore space that will be occupied by carbon dioxide over the life of the project;	1.0 PORE SPACE ACCESS North Dakota law explicitly grants title of the pore space in all strata underlying the surface of lands and waters to the overlying surface estate, i.e., the surface owner owns the pore space (North Dakota Century Code [NDCC] Chapter 47-31 Subsurface Pore Space Policy). Prior to issuance of the storage facility permit (SFP), the storage operator is required by North Dakota statute for geologic storage of carbon dioxide (CO2) to make a good faith attempt to obtain the consent of all persons who own pore space within the storage reservoir. The North Dakota Industrial Commission (NDIC) can amalgamate the nonconsenting owners' pore space into the storage reservoir if the operator can show that 1) after making a good faith attempt, it was able to obtain consent of persons who own at least 60% of this pore space in the storage reservoir and 2) NDIC finds that the nonconsenting owners will be equitably compensated for the use of the pore space. Amalgamation of pore space will be considered at an administrative hearing as part of the regulatory process required for consideration of the SFP application (NDCC §§ 38-22-06(3) and -06(4) and North Dakota Administrative Code [NDAC] §§ 43-05-01-08[1] and -08[2]). In connection herewith, Minnkota submits the form of storage agreement attached hereto as Appendix H which, upon final approval by NDIC, shall govern certain rights and obligations of the storage operator and the persons owning pore space within the amalgamated storage reservoir.	Figure 1-1. Deadwood storage facility area map.
		1. The commission shall hold a public hearing before issuing a storage facility permit. At least forty-five days prior to the hearing, the applicant shall give notice of the hearing to the following:	c. A map showing the storage reservoir boundary and one-half mile outside of the storage reservoir boundary with a description of pore space ownership;	1.1 Storage Reservoir Pore Space Minnkota Power Cooperative, Inc. (Minnkota) defines the proposed storage reservoir boundaries as the projected vertical and horizontal migration of the CO2 plume from the start until the end of injection. The storage reservoir vertical and horizontal boundaries are identified based on the computational model output of the areal extent of the CO2 plume volume at the end of the injection period (20 years), in which a CO2 saturation is predicted to be greater than or equal to 5%. The model utilizes applicable geologic and reservoir engineering information and analysis as detailed in Section 2.0 and Appendix A.	Table 1-1. Owners, Lessees, and Operators Requiring Pore Space Hearing Notification
	NDAC 43-05-01-08 §1 & 2	a. Each operator of mineral extraction activities within the facility area and within one-half mile [0.80 kilometer] of its outside boundary;	d. A map showing the storage reservoir boundary and one-half mile outside of its boundary with a description of each operator of mineral extraction activities;	The operation inputs for the simulation scenarios assumes storage at the average designed injection rates, approximately 4.0 MMT/year injected into the Broom Creek storage reservoir for the first 15 years of operation and 3.5MMT/year for year 15 through year 20 of operation. The operation input for the Black Island-Deadwood simulation scenario assumes storage at the maximum designed injection rate of approximately 1.17 MMT/year for 20 years. These maximum rates were based on Minnkota's consideration of the planned maintenance, outage, and operating capacity of the Milton R. Young Station (MRYs) and carbon capture equipment along with the planned maintenance requirements and testing requirements of the Tundra SGS (secure geologic storage) site equipment. During Phase 1 operation of the Broom Creek storage facility, Minnkota will conduct ongoing validation and assessment of need for construction and operation of the Black Island-Deadwood.	Table 1-2. Mineral Owners, Mineral Lessees and Operators Requiring Hearing Notification
		b. Each mineral lessee of record within the facility area and within one-half mile [0.80 kilometer] of its outside boundary;	e. A map showing the storage reservoir boundary and one-half mile outside of its boundary with a description of each mineral lessee of record;	1.1.1 Horizontal Boundaries The proposed horizontal boundaries of the storage reservoirs, including an adequate buffer area, are defined by the simulated migration of the CO2 plume, using the actual rate of injection from the start until the end of injection. In establishing the definite boundaries of the storage facility area, Minnkota considered the characteristics and external factors influencing the operating life of the project, the opportunity for phased development of stacked storage facilities, and the coordinated operation of Broom Creek and Deadwood storage facilities if needed. The horizontal storage reservoir boundary is proposed using a 20-year injection period and was benchmarked off the maximum design life of the carbon capture equipment. The reservoir models will be updated regularly with operating data and the operator will provide evidence of the CO2 plume migration as part of the reevaluations required under NDAC §§ 43-05-01-05 1 and 43-05-01-	
		g. A map showing the storage reservoir boundary and one-half mile outside of its boundary with a description of each owner of record of minerals.	f. A map showing the storage reservoir boundary and one-half mile outside of its boundary with a description of each surface owner of record;		

		<p>c. Each owner of record of the surface within the facility area and one-half mile [0.80 kilometer] of its outside boundary;</p> <p>d. Each owner of record of minerals within the facility area and within one-half mile [0.80 kilometer] of its outside boundary;</p> <p>e. Each owner and each lessee of record of the pore space within the storage reservoir and within one-half mile [0.80 kilometer] of the reservoir's boundary; and</p> <p>f. Any other persons as required by the commission.</p> <p>2. The notice given by the applicant must contain:</p> <p>a. A legal description of the land within the facility area.</p> <p>b. The date, time, and place that the commission will hold a hearing on the permit application.</p> <p>c. A statement that a copy of the permit application and draft permit may be obtained from the commission.</p>	<p>a. Geologic description of the storage reservoir Name Lithology</p>	<p>11.4. These reevaluations are to occur no later than every 5 years, thus the simulation output at 5 years of operation is indicated in Figure 1-1 to exemplify the buffer existing within the proposed storage facility area, allowing safe operation as proposed and contemplated. The stacked storage operations scenario option allows for coordination of the capacity of the Black-Island Deadwood with the Broom Creek capacity and provides further assurance of the contemplated operation within the defined storage reservoir boundary.</p> <p>The simulated horizontal storage reservoir boundary results proposed for the Deadwood Formation are depicted in Figure 1-1.</p> <p>1.1.2 Vertical Boundaries The Tundra SGS site was designed using a stacked storage concept, where two storage reservoirs identified with varying vertical depths could be accessed by a common well site. A key benefit of this development approach is to minimize the surface land use impact by reducing the amount of surface facilities required for operation. Despite the significant overlap of pore space area between the Broom Creek and Deadwood reservoirs, two distinct SFPs are being requested, with the distinct vertical boundaries based upon geologic analysis and simulations which are further detailed and described in Section 2.0 of the respective SFP application supporting information.</p> <p>The applicant requests amalgamation of the injection zone pore space within the Black Island, Deadwood E-member, and Deadwood C-member Sand intervals, as identified in Section 2.0, Figure 2-3. In addition to the injection zone, the applicant requests the permitted storage facility consist of the Icebox Formation as the upper confining zone and Deadwood B member shale as the lower confining zone (Section 2.0, Figure 2-3).</p> <p>1.2 Persons Notified Minnkota will identify the owners of record (surface and mineral), pore space and mineral lessees of record, and operators of mineral extraction activities within the facility area and within 0.5 mi of its outside boundary. Minnkota will notify in accordance with NDAC § 43-05-01-08 of the SFP hearing at least 45 days prior to the scheduled hearing. An affidavit of mailing will be provided to NDIC to certify that these notifications were made.</p> <p>The identification of the owners, lessees, and operators that require notification was based on the following, recognizing that all surface owners also own the underlying pore space in accordance with North Dakota law (NDCC Chapter 47-31):</p> <ul style="list-style-type: none"> • A map showing the extent of the pore space that will be occupied by the CO₂ plume over the injection period, including the storage reservoir boundary and 0.5 mi (0.8 km) outside of the storage reservoir boundary with a description of the pore space ownership, surface owner, and pore space lessees of record (Figure 1-1). • A table identifying all pore space (surface) owners, and lessees of pore space of record, their mailing addresses, and legal descriptions of their pore space landownership (Table 1-1). • A table identifying each owner of record of minerals, mineral lessees and operators of record (Table 1-2) 	
<p>Geologic Exhibits</p>	<p>NDAC 43-05-01-05 §1b(1) and §1b(2)(k)</p>	<p>NDAC 43-05-01-05 §1b(1) and §1b(2)(k) (1) The name, description, and</p>		<p>2.3 Storage Reservoir (injection zone) Regionally, the Black Island and Deadwood Formations are laterally extensive (Figure 2-8). The Black Island comprises high-energy shallow marine sandstone (permeable storage intervals) and shale (impermeable layers). The sandy members (C-sand and E member) of the Deadwood Formation comprise reworked quartz arenites of marginal marine environment.</p>	<p>Figure 2-8. Areal extent of the Deadwood Formation in North Dakota (modified from Nesheim, 2012b).</p>

average depth of the storage reservoirs;
 (k) Data on the depth, areal extent, thickness, mineralogy, porosity, permeability, and capillary pressure of the injection and confining zone, including facies changes based on field data, which may include geologic cores, outcrop data, seismic surveys, well logs, and names and lithologic descriptions;

Average depth
 Average thickness

(Figure 2-9). The Deadwood Formation unconformably overlies the Precambrian basement and is unconformably overlain by the sands of the Black Island Formation followed by the conformable Icebox Formation (Figure 2-3).

At J-ROC1, the Deadwood C-sand member is made up of 50 ft of sandstone and is located at a depth of 9,543 ft. Across the model area, the Deadwood C-sand member varies in thickness from 40 to 88 ft, with an average thickness of 64 ft. Based on offset well data and geologic model characteristics, the Deadwood C-sand member is 100% sandstone. The Deadwood E member and Black Island Formations are made up of 69 ft of sandstone and 19 ft of dolostone and limestone at J-ROC1 and are located at a depth of 9,283 ft. Across the project area, the Deadwood E member varies in thickness from 0 to 139 ft, with an average thickness of 81 ft. The Black Island Formation varies in thickness from 14 to 77 ft, with an average of 36 ft. Based on offset well data and geologic model characteristics, the net reservoir thickness within the project area ranges from 63 to 287 ft, with an average of 165 ft (Figure 2-10).

The well log signatures for the Black Island and Deadwood storage complex are consistent and predictable across the project area. The following are the correlation definitions used to indicate the reservoir and confining zones (Figure 2-11):

- The Icebox Formation is indicated at the transitions between a moderate GR, higher resistivity, low neutron, high density, and moderate compressional sonic for the base of the Roughlock Formation to the high GR, low resistivity, high neutron, high density, and high compressional sonic. The Icebox Formation is correlative across the project area.
- The Black Island Formation is indicated by the transition from the Icebox Formation to a relatively low GR, low neutron, high density, and low compressional sonic. The Black Island has interbedded high-GR and moderate-resistivity sections.
- The Deadwood Formation (Deadwood E member) is indicated by a transition from the base high GR signature of the Black Island Formation to a low GR signature, lower neutron, higher density, and lower compressional sonic. The Deadwood E thins from west to east across the project area.
- The Deadwood D member (base of Deadwood E member) is indicated by a transition to moderate to higher GR from top to base, higher resistivity, low neutron, high density, and low to higher compressional sonic from top to base.
- The Deadwood C member is the transition between the high GR of the Deadwood D member and moderate GR, higher resistivity, low neutron, high density, and low compressional sonic. The Deadwood C-sand member at the base of the Deadwood C member is indicated by a section of low GR (10 API), low resistivity, moderate neutron, moderate density, and moderate compressional sonic.
- The Deadwood B member (base of Deadwood C-sand member) is indicated by the transition from a low GR signature of the Deadwood C-sand member to a high GR, higher resistivity, low neutron, high density, and higher compressional sonic.
- The Deadwood B member shale unit is indicated by a higher GR, moderate resistivity, higher neutron, moderate density, and high compressional sonic. This unit is contained within the Deadwood B member and can be correlated across the project area.
- The Precambrian basement is indicated by a change from low to relatively high GR, low-to-moderate resistivity, and a lower compressional sonic character that can be correlated across the project area.

Seismic data collected as part of site characterization efforts (Figure 2-6) were used to reinforce structural correlation and thickness estimations of the storage reservoir. The combined structural correlation and analyses indicate that there should be few-to-no major reservoir stratigraphic discontinuities near J-LOC1 and J-ROC1 (Figures 2-12a and 2-12b). The Deadwood E member pinches out 12.5 mi to the east of the J-ROC1 site. A structure map of the Deadwood and Black Island Formations shows no detectable features (e.g., folds, domes, or fault traps) with associated spill points in the project area (Figure 2-13).

For additional information, go to Section 2.1 of the Tundra SGS SFP.

Figure 2-9. Type log showing the interpreted Deadwood members within the Williston Basin (Lefever and others, 1987).

Figure 2-10. Isopach map of the Black Island and Deadwood Formations in the simulation model extent.

Figure 2-11. Well log display of the interpreted lithologies of the Roughlock, Icebox, Black Island, Deadwood, and Precambrian in J-ROC1.

Figure 2-12a. Regional well log stratigraphic cross sections of the Roughlock, Icebox, Black Island, and Deadwood Formations and the Precambrian basement flattened on the top of the Precambrian basement. Logs displayed in tracks from left to right are 1) GR (green) and caliper (red), 2) delta time (blue), and 3) interpreted lithology log.

Figure 2-12b. Regional well log cross sections showing the structure of the Roughlock, Icebox, Black Island, and Deadwood Formations and the Precambrian basement. Logs displayed in tracks from left to right are 1) GR (green) and caliper (red) and 2) delta time (blue).

Figure 2-13. Structure map of the Black Island and Deadwood Formations across the simulation model extent.

Table 2-5. Description of CO₂ Storage Reservoir (injection zone) at the J-LOC1 Well.

Figure 2-14. Cross section of the Tundra SGS CO₂ storage complex from the geologic model showing lithofacies distribution in the Deadwood Formation. Depths are referenced to mean sea level.

Figure 2-15. Vertical distribution of core-derived porosity and permeability values in the Tundra SGS CO₂ storage complex.

Table 2-6. Deadwood Microfracture Results from J-LOC1.

NDAC 43-05-01-05 §1b(2)(k)
 (k) Data on the depth, areal extent, thickness, mineralogy, porosity, permeability, and capillary pressure of the injection and confining zone, including facies changes based on field data, which may include geologic cores, outcrop data, seismic surveys, well logs, and names and lithologic descriptions.

NDAC
 43-05-01-05
 §1b(2)(k)

- b. Data on the injection zone and source of the data which may include geologic cores, outcrop data, seismic surveys, and well logs
- Depth
 - Areal extent
 - Thickness
 - Mineralogy
 - Porosity
 - Permeability
 - Capillary pressure
 - Facies changes

Table 2-1. Formations Comprising the Tundra SGS CO₂ Storage Complex

Formation	Purpose	Average Thickness at Tundra SGS Site, ft	Average Depth Tundra SGS Site, ft TVD	Lithology
Icebox	Upper confining zone	118 (58 to 176)	9,308	Shale
Black Island and Deadwood E member	Storage reservoir (i.e., injection zone)	118 (35 to 202)	9,427	Sandstone, shale, dolostone, limestone
Deadwood C member sand	Storage reservoir (i.e., injection zone)	64 (40 to 88)	9,773	Sandstone
Deadwood B member shale	Lower confining zone	34 (20 to 49)	9,791	Shale

2.3 Storage Reservoir (injection zone)

Regionally, the Black Island and Deadwood Formations are laterally extensive (Figure 2-8). The Black Island comprises high-energy shallow marine sandstone (permeable storage intervals) and shale (impermeable layers). The sandy members (C-sand and E member) of the Deadwood Formation comprise reworked quartz arenites of marginal marine environment (Figure 2-9). The Deadwood Formation unconformably overlies the Precambrian basement and is unconformably overlain by the sands of the Black Island Formation followed by the conformable Icebox Formation (Figure 2-3).

At J-ROCI, the Deadwood C-sand member is made up of 50 ft of sandstone and is located at a depth of 9,548 ft. Across the model area, the Deadwood C-sand member varies in thickness from 40 to 88 ft, with an average thickness of 64 ft. Based on offset well data and geologic model characteristics, the Deadwood C-sand member is 100% sandstone. The Deadwood E member and Black Island Formations are made up of 69 ft of sandstone and 19 ft of dolostone and limestone at J-ROCI and are located at a depth of 9,283 ft. Across the project area, the Deadwood E member varies in thickness from 0 to 139 ft, with an average thickness of 81 ft. The Black Island Formation varies in thickness from 14 to 77 ft, with an average of 36 ft. Based on offset well data and geologic model characteristics, the net reservoir thickness within the project area ranges from 63 to 287 ft, with an average of 165 ft (Figure 2-10).

The well log signatures for the Black Island and Deadwood storage complex are consistent and predictable across the project area. The following are the correlation definitions used to indicate the reservoir and confining zones (Figure 2-11):

- The Icebox Formation is indicated at the transitions between a moderate GR, higher resistivity, low neutron, high density, and moderate compressional sonic for the base of the Roughlock Formation to the high GR, low resistivity, high neutron, high density, and high compressional sonic. The Icebox Formation is correlative across the project area.
- The Black Island Formation is indicated by the transition from the Icebox Formation to a relatively low GR, low resistivity, high density, and low compressional sonic. The Black Island has interbedded high-GR and moderate-resistivity sections.
- The Deadwood Formation (Deadwood E member) is indicated by a transition from the base high GR signature of the Black Island Formation to a low GR signature, lower neutron, higher density, and lower compressional sonic. The Deadwood E thins from west to east across the project area.
- The Deadwood D member (base of Deadwood E member) is indicated by a transition to moderate to higher GR from top to base, higher resistivity, low neutron, high density, and low to higher compressional sonic from top to base.
- The Deadwood C member is the transition between the high GR of the Deadwood D member and moderate GR, higher resistivity, low neutron, high density, and low compressional sonic. The Deadwood C-sand member at the base of the Deadwood C member is indicated by a section of low GR (10 API), low resistivity, moderate neutron, moderate density, and moderate compressional sonic.
- The Deadwood B member (base of Deadwood C-sand member) is indicated by the transition from a low GR signature of the Deadwood C-sand member to a high GR, higher resistivity, low neutron, high density, and higher compressional sonic.

Figure 2-8 Areal extent of the Deadwood Formation in North Dakota (modified from Nesheim, 2012b)

Figure 2-9 Type log showing the interpreted Deadwood members within the Williston Basin (Lefever and others, 1987)

Figure 2-10 Isopach map of the Black Island and Deadwood Formations in the simulation model extent

Figure 2-11 Well log display of the interpreted lithologies of the Roughlock, Icebox, Black Island, Deadwood, and Precambrian in J-ROCI

Figure 2-12a Regional well log stratigraphic cross sections of the Roughlock, Icebox, Black Island, and Deadwood Formations and the Precambrian basement flattened on the top of the Precambrian basement. Logs displayed in tracks from left to right are 1) GR (green) and caliper (red), 2) delta time (blue), and 3) interpreted lithology log.

Figure 2-12b Regional well log cross sections showing the structure of the Roughlock, Icebox, Black Island, and Deadwood Formations and the Precambrian basement. Logs displayed in tracks from left to right are 1) GR (green) and caliper (red) and 2) delta time (blue)

Figure 2-13 Structure map of the Black Island and Deadwood Formations across the simulation model extent

Table 2-5 Description of CO₂ Storage Reservoir (injection zone) at the J-ROCI Well

- The Deadwood B member shale unit is indicated by a higher GR, moderate resistivity, higher neutron, moderate density, and high compressional sonic. This unit is contained within the Deadwood B member and can be correlated across the project area.
- The Precambrian basement is indicated by a change from low to relatively high GR, low-to-moderate resistivity, and a lower compressional sonic character that can be correlated across the project area.

Seismic data collected as part of site characterization efforts (Figure 2-6) were used to reinforce structural correlation and thickness estimations of the storage reservoir. The combined structural correlation and analyses indicate that there should be few-to-no major reservoir stratigraphic discontinuities near J-LOC1 and J-ROC1 (Figures 2-12a and 2-12b). The Deadwood E member pinches out 12.5 mi to the east of the J-ROC1 site. A structure map of the Deadwood and Black Island Formations shows no detectable features (e.g., folds, domes, or fault traps) with associated spill points in the project area (Figure 2-13).

For additional information, go to section 2.3 of the Tundra SGS SFP.

Table 2-5: Description of CO₂ Storage Reservoir (Injection zone) at the J-LOC1 Well

Injection Zone Properties			
Property	Description		
Formation Name	Black Island, Deadwood E member, and Deadwood C-sand member		
Lithology	Sandstone, dolostone, limestone		
Formation Top Depth, ft	9782.2, 9820.9, and 10,077.4		
Thickness, ft	38.9, 92.3, and 60.9		
Capillary Entry Pressure (CO ₂ /brine), psi	0.16		
Geologic Properties			
Formation	Property	Laboratory Analysis	Model Property Distribution
Black Island (sandstone)	Porosity, %*	8.0 (3.4–10.3)	5.6 (1.1–14.8)
	Permeability, mD**	3.7 (0.0019–157)	0.805 (<0.0001–96.0)
Deadwood E Member (sandstone)	Porosity, %	10 (6.85–14.43)	7.0 (0–17.7)
	Permeability, mD	5.63 (0.0325–2,060)	3.88 (<0.0001–4549.2)
Deadwood C-Sand Member	Porosity, %	7.6 (1.01–14.69)	7.6 (0.3–17.2)
	Permeability, mD	11 (0.0018–1140)	7.03 (<0.0001–830.3)

Figure 2-14 Cross section of the Tundra SGS CO₂ storage complex from the geologic model showing lithofacies distribution in the Deadwood Formation. Depths are referenced to mean sea level.

Figure 2-15 Vertical distribution of core-derived porosity and permeability values in the Tundra SGS CO₂ storage complex.

Table 2-6 Deadwood Microfracture Results from J-LOC1

Figure 2-16 J-LOC1 Deadwood Formation MDT microfracture in situ stress pump cycle graph at 9,885 ft.

Figure 2-17 Step rate test data from the Deadwood Formation with no fracture opening pressure observed (courtesy of GeothermEx, a Schlumberger Company). The x-axis is injection rate in bpm while the y-axis is bottomhole injection pressure in psi.

Figure 2-18 GeothermEx interpretation of the Deadwood Formation pressure fall-off test using Saphir - Kappa (courtesy of GeothermEx, a Schlumberger Company).

Figure 2-19 Deadwood well test summary of J-LOC1 well (modified from Schlumberger's presentation).

Table 2-7 J-LOC1 Deadwood Formation Test Summary

Figure 2-20 Laboratory-derived mineralogical characteristics of the Black Island and Deadwood Formations.

Figure 2-21a XRF data from the Black Island Formation from J-LOC1.

Figure 2-21b XRF data from the Upper Deadwood Formation, including the C, D, and E members from J-LOC1.

Table 2-8 XRD Results for J-LOC1 Deadwood Formation Core Samples

Table 2-9 Deadwood Formation Water Ion Composition, expressed as molality

Figure 2-22 The upper graph shows cumulative injection vs. time. There is an increase in injection due to geochemical

2.3.1 J-LOC1 Injectivity Tests

The J-LOC1 formation well testing was performed specifically to characterize the injectivity and obtain the breakdown pressure of the Deadwood Formation in December 2020. The well testing consisted of step rate test, extended injection test, and pressure fall-off test. The well was perforated from 9,880 to 9,890 ft with 4 shots per foot (spf) and 90° phasing. To record the bottomhole pressure, a downhole memory gauge was installed at a depth of 9,835 ft. The well test data were interpreted by GeothermEx, a Schlumberger Company.

The step rate test was performed with a total of ten injection rates. The initial injection rate was 2.00 barrels per minute (bpm), and the final injection rate was 10.5 bpm. From the step rate test evaluation, no definitive analysis can be concluded from this test, but injection at the higher rate was below fracture opening pressure. Figure 2-17 provides the step rate test data of the Deadwood Formation.

A 12-hour extended injection rate was performed at a constant rate of 4.5 bpm followed by a 24-hour pressure fall-off test. The pressure fall-off data interpretation showed a permeability of 1,621 mD, with reservoir pressure of 4,521 psi. There was no lateral boundary observed from the pressure fall-off test within the radius of investigation of 9,183 ft, as shown in Figures 2-18 and 2-19. The Deadwood Formation well testing is summarized in Table 2-7.

2.3.2 Mineralogy

The combined interpretation of core, well logs, and thin sections shows that the Deadwood Formation is composed of fine- to medium-grained sandstone and several interbeds of carbonates (dolostone and limestone). Seventy-eight depth intervals representing nearly 274 ft of the Deadwood Formation were sampled for thin-section creation, XRD mineralogical determination, and XRF bulk chemical analysis. For the assessment below, thin sections and XRD provided an independent confirmation of the mineralogical constituents of the Deadwood Formation.

Thin-section analysis of the sandstone intervals shows that quartz (85%) is the dominant mineral. Throughout these intervals are minor occurrences of feldspar (5%), dolomite (5%), and calcite as cement (5%). Where present, calcite and dolomite are crystallized between quartz grains and obstruct the intercrystalline porosity. The contact between grains is long (straight) to tangential. The porosity due to quartz and feldspar dissolution ranges from 3% to 14%.

Four distinct carbonate intervals are notable. The first is the presence of a fine- to medium-grained dolostone (80%), with quartz of variable size and shape (10%) and calcite (10%) present. The porosity is not well-developed, averaging 3%. Diagenesis is expressed by dolomitization of the original calcite grains and dissolution of quartz grains. Fossils are not present in this interval. In the second occurrence of carbonate, the texture becomes coarse and more fossil-rich, comprising fine-grained limestone (80%), dolomite (10%), and quartz (10%). Diagenesis is expressed by dolomitization of the original calcite grains. The porosity is mainly fracture-related and averages 2%.

XRD data from the samples supported facies interpretations from core descriptions and thin-section analysis. The Deadwood Formation core primarily comprises quartz, feldspar, dolomite, calcite, anhydrite, clay, and iron oxides (Figure 2-20).

XRF data are shown in Figure 2-21a and 2-21b for the Black Island and Upper Deadwood Formations. As shown, the majority of the Upper Deadwood sandstone, calcite, and dolomite intervals are confirmed through the high percentages of SiO₂, CaO, and MgO. The presence of certain percentages of CaO and SO₄ at 10,077 ft indicates a presence of anhydrite as cement. The formation shows very little clay, with a range of 0.5% to 10% being the highest detected.

2.3.3 Mechanism of Geologic Confinement

For Tundra SGS, the initial mechanism for geologic confinement of CO₂ injected into the Deadwood Formation will be the cap rock (Icebox interval), which will contain the initially buoyant CO₂ under the effects of relative permeability and capillary pressure. Lateral movement of the injected CO₂ will be restricted by residual gas trapping (relative permeability) and solubility trapping (dissolution of the CO₂ into the native formation brine), confining the CO₂ within the proposed storage reservoir, as identified in Figure 2-3. After the injected CO₂ becomes dissolved in the formation brine, the brine density will increase. This higher-density brine will ultimately sink in the storage formation (convective mixing). Over a much longer period (>100 years), mineralization of the injected CO₂ will ensure long-term, permanent geologic confinement. Injected CO₂ is not expected to adsorb to any of the mineral constituents of the target formation; therefore, this process is not considered to be a viable trapping mechanism in this project. Adsorption of CO₂ is a trapping mechanism notable in the storage of CO₂ in deep unminable coal seams.

reactions. The lower graph shows wellhead injection pressure for the geochemistry case is slightly lower than for the injection case without geochemistry.

Figure 2-23. Geochemistry case simulation results after 20 years of injection showing the distribution of CO₂ molality. Upper images are west-east and north-south cross sections. Lower image is a planar view of Simulation Layer 8.

Figure 2-24. Geochemistry case simulation results after 20 years of injection showing the pH of formation brine.

Figure 2-25. Dissolution and precipitation quantities of reservoir minerals due to CO₂ injection. Dissolution of illite and anhydrite with precipitation of calcite, quartz, and dolomite was observed. K-feldspar dissolves during the injection period but slowly begins to reprecipitate after injection.

Figure 2-26. Molar distribution of illite, the most prominent dissolved mineral at the end of the injection period, shown in green. Compare to the molar CO₂ distribution in Figure 2-23.

Figure 2-27. Molar distribution of calcite, the most prominent precipitated mineral at the end of the injection period. Compare to the molar CO₂ distribution in Figure 2-23.

Figure 2-28. Change in porosity due to net geochemical dissolution after the 20-year injection period. Maximum porosity change is less than 0.1%. Compare to the molar CO₂ distribution in Figure 2-22.

2.3.4 Geochemical Information of Injection Zone

Geochemical simulation has been performed to calculate the effects of introducing the CO₂ stream into the injection zone. The effects have been found to be minor and not threatening to the geologic integrity of the storage system.

The injection zone, the Upper Deadwood sands and Black Island Formation, was investigated using the geochemical analysis option available in the Computer Modelling Group Ltd. (CMG) compositional simulation software package GEM. GEM is also the primary simulation software used for evaluation of the reservoir's dynamic behavior resulting from the expected CO₂ injection. The project's injection scenario was rerun with the geochemical analysis option included, and the differences were compared to the scenario that was run without the geochemical option included. Geochemical alteration effects were seen in the geochemistry case, as described below. However, these effects were not significant enough to cause meaningful change to storage reservoir performance or mechanical properties of the storage formation.

The geochemistry case was constructed using the injection case simulation inputs and assumptions as well as honoring the average mineralogical composition of the Deadwood Formation rock materials (94% of bulk reservoir volume) and average formation brine composition (6% of bulk reservoir volume). XRD data from the JLOC-1 well core samples were used to inform the mineralogical composition of the Deadwood Formation used in the geochemical modeling (Table 2-8). The ionic composition of the formation water is listed in Table 2-9. The injection stream composition remained the same as the injection case simulation, assumed as 100% CO₂. The injection stream is expected to be 99.9% CO₂. The other constituents represent 0.1% in the stream and likely include nitrogen (N₂) and water vapor (H₂O). However, 100% CO₂ was assumed for computational efficiency in the geochemical simulation to investigate rock and fluid interaction in the saline storage formation. N₂ is known to be an inert gas, and water is already in the saline storage formation and will have little to no impact on the geochemical reactions. In the injection stream, argon (Ar) and oxygen vapor (O₂) may also be present but in a negligible amount that would have no impact on geochemical reactions in the storage formation. The geochemistry case was run for the 20-year injection period followed by 94 years of postinjection shutdown and monitoring.

Figure 2-22 shows that reservoir performance results for the two cases are slightly different. As a result of geochemical reactions in the reservoir, there is an approximately 8% increase in cumulative injection potential. Wellhead injection pressure is slightly lower for the geochemistry case. Figure 2-23 shows the concentration of CO₂ in molality in the reservoir after 20 years of injection. The pH of the reservoir brine changes in the vicinity of the CO₂ accumulation, as shown in Figure 2-24. The pH of the Deadwood native brine is 5.7 whereas the fluid pH declines to approximately 4.0 in the CO₂-flooded areas.

Figure 2-25 shows the mass of mineral dissolution and precipitation due to geochemical reactions in the model. Illite is the most prominent dissolution mineral, followed by anhydrite. Illite and anhydrite dissolution slows after Year 2042, the year in which injection ends. K-feldspar dissolves during the injection period but slowly begins to reprecipitate in the near-wellbore areas after injection. Calcite, quartz, and dolomite are the primary precipitation minerals. There is a small amount of net dissolution during the simulation period as somewhat larger quantities of minerals are dissolved rather than precipitated. Slow net dissolution continues after the injection period. Figures 2-26 and 2-27 provide an indication of the change in distribution of the mineral that has experienced the most dissolution (illite) and the mineral that has experienced the most precipitation (calcite), respectively. Considering the apparent net dissolution of minerals in the system, as indicated in Figure 2-25, there is an associated net increase in porosity of the affected area, as shown in Figure 2-28. However, the porosity change is small, less than 0.1% porosity units, equating to a maximum increase in average porosity from 6% to 6.1% after the 20-year injection period.

Results of the simulation show that geochemical processes will be at work in the Deadwood Formation during and after CO₂ injection. Mineral dissolution and some reprecipitation are expected to occur during the simulated time span of 114 years. Fluid pH will decrease in the area of the CO₂ accumulation from 5.7 to approximately 4.0, and there will be a slight net increase in system porosity. However, these changes create relatively small changes in reservoir performance parameters such as injection rate or wellhead injection pressure.

- c. Data on the confining zone and source of the data which may include geologic cores, outcrop data, seismic surveys, and well logs
 - Depth
 - Areal extent
 - Thickness
 - Mineralogy
 - Porosity
 - Permeability
 - Capillary pressure
 - Facies changes

2.4 Confining Zones

The confining zones for the Deadwood and Black Island Formations are the overlying Icebox Formation and underlying Deadwood B member shale (Figure 2-3), Table 2-10). All three units, the Icebox Formation, Deadwood B member shale, and Precambrian basement, consist of impermeable rock layers.

Table 2-10. Properties of Upper and Lower Confining Zones at the J-LOC1 Well.

Confining Zone Properties	Upper Confining Zone	Lower Confining Zone
Formation Name	Icebox	Deadwood B (member shale)
Lithology	Shale	Shale
Formation Top Depth, ft	9,308	9,791
Thickness, ft	118	34
Porosity, % (core data)*	3.6***	2.0
Permeability, mD (core data)**	0.00002***	0.0103
Capillary Entry Pressure (CO ₂ /brine), psi	845	176****
Depth Below Lowest Identified USDW, ft	8,097	8,580

2.4.1 Upper Confining Zone

In the Tundra SGS area, the Icebox consists of shale. This upper confining zone is laterally extensive across the project area (Figures 2-29 and 2-30) 9,308 ft below the land surface and 118 ft thick at the Tundra SGS site (Table 2-10 and Figure 2-31). The upper confining zone has sufficient areal extent and integrity to contain the injected CO₂. The upper confining zone is free of transmissive faults and fractures (Section 2.5). The contact between the underlying sandstone of the Black Island Formation is conformable and can be correlated across the project area. The transition from the Icebox to the Black Island is indicated by a relatively low GR, low neutron, high density, and low compressional sonic across the contact (Figure 2-32).

Microfracture in situ stress tests were performed using the MDT tool in the J-LOC1 wellbore. Microfracture stress tests were attempted in the J-ROC1 well, however, because of extremely unstable wellbore conditions, the MDT stress tool run was not performed after a near loss of the tool in the wellbore.

For the J-LOC1 well, in the Icebox Formation at 9,749.5 and 9,751.2 ft, the MDT tool was unable to cause a breakdown in the formation with an applied maximum injection pressure of 10,984.9 and 10,867.24 psi, respectively.

Table 2-8. XRD Results for J-LOC-1 Deadwood Formation Core Samples

Mineral Data	Average %
Calcite	25.85
Dolomite	12.78
Quartz	32.94
Illite	4.7
K-Feldspar	8.54
Anhydrite	5.18
Ankerite	3.97
Other	6.04

Table 2-10. Properties of Upper and Lower Confining Zones at the J-LOC1 Well

Figure 2-29. Areal extent of the Icebox Formation in western North Dakota (modified from Nesheim, 2012a)

Figure 2-30. Structure map of the upper confining zone across the simulation model extent

Figure 2-31. Isopach map of the upper confining zone across the simulation model extent

Figure 2-32. Well log display of the upper confining zone at the J-ROC1 well

Figure 2-33. J-LOC1 Icebox Formation MDT microfracture in situ stress test pump cycle graph at 9,749.5 ft

Figure 2-34. J-LOC1 Icebox Formation MDT microfracture in situ stress test pump cycle graph at 9,751.2 ft

Table 2-11. Icebox Core Sample Porosity and Permeability from J-LOC1

Table 2-12. XRF Data for the Icebox Formation from the J-LOC1 Well

Table 2-13. Mineral Composition of the Icebox Formation Derived from XRD Analysis of J-LOC-1 Core Samples (9773 ft MD)

Table 2-14. Formation Water Chemistry from Deadwood Formation Fluid Samples from J-LOC-1

(Figures 2-33 and 2-34). The maximum injection pressure was limited by the dual-packer mechanical specifications having a set maximum differential pressure rating between the upper packer and hydrostatic pressure of 5,500 psi, see Appendix D, "Schlumberger Dual-Packer Module." The inability to break down the Icebox Formation at the two depths indicated that the formation is very tight competent and exhibits sufficient geologic integrity to contain the injected CO₂ stream.

The Icebox Formation was not suitable to collect competent core samples from the J-LOC1 well core for the purposes of porosity and permeability laboratory tests; the samples would crush in the equipment. The formation was found to be tight, and porosity and permeability estimates were derived from HPMT testing for one sample (Table 2-11). The lithology of the cored sections of the Icebox Formation is primarily shale, with minor pyrite.

2.4.1.1 Mineralogy

Thin-section investigation shows that the Icebox Formation is primarily shale. Thin sections were created from the base of the Icebox and the shales present in the Black Island Formation. The shales present in the Black Island Formation have characteristics similar to the shales of the Icebox Formation. The mineral components present are clay, quartz, feldspar, and iron oxides. The quartz grains are always surrounded by a clay matrix. The porosity and permeability measurements could not be performed because of the fissility of the rock. The porosity was estimated from HPMT analysis and equaled 3.6%. Log interpretations (Figure 2-31) and visual inspection of the collected core validate consistent mineral assemblage within the Icebox and Black Island Formations.

XRD data from the J-LOC1 well core supported facies interpretations from core descriptions and thin-section analysis. The Icebox Formation comprises clay, quartz, feldspar, and iron oxides.

XRF analysis of the Icebox Formation identified the major chemical constituents to be dominated by SiO₂ (53%), SO₃ (1.6%), CaO (0.26%), Al₂O₃ (24%), and MgO (1.9%), correlating well with the silicate- and aluminum-rich mineralogy determined by XRD (Table 2-12). This correlates with XRD, core description, and thin-section analysis.

2.4.1.2 Geochemical Interaction

Geochemical simulation using PHREEQC geochemical software was performed to calculate the potential effects of injected CO₂ on the Icebox Formation, the primary confining zone for the Deadwood Formation. A vertically oriented 1D simulation was created using a stack of 1-meter grid cells where the formation was exposed to CO₂ at the bottom boundary of the simulation and allowed to enter the system by molecular diffusion processes. The results were calculated at grid cell centers located at 0.5, 1.5, and 2.5 meters above the cap rock-CO₂ exposure boundary. The mineralogical composition of the Icebox was honored (Table 2-13). The formation brine composition was assumed to be the same as the known composition from the Deadwood injection zone below (Table 2-14). The injection stream composition was as described by Minkota Power Cooperative (Minkota) (Table 2-15). Three different exposure levels, expressed in moles per year, of the CO₂ stream to the cap rock (1.15, 2.3, and 4.5 moles/yr) were used. These values are considerably higher than the expected actual exposure levels. This overestimate was done to ensure that the degree and pace of geochemical change would not be underestimated. These three simulations were run for 45 years to represent 20 years of injection plus 25 years postinjection. The simulations were performed at reservoir pressure and temperature conditions.

The results showed relatively minor geochemical processes at work. Figures 2-35, 2-36, and 2-37 show results from the most extreme exposure case. Figure 2-35 shows change in fluid pH over time as CO₂ enters the system. For the well at the CO₂ interface, C1, the pH declines to and stabilizes at a level of 4.9. For the cell occupying the space 1 to 2 meters into the cap rock, C2, the pH only begins to change after Year 8. The pH is unaffected in Cell C3. Figure 2-36 shows change in mineral dissolution and precipitation in grams per cubic meter of rock. Dashed lines are for Cell C1, solid lines that are seen in the figure are from Cell C2, 1.0 to 2.0 meters into the cap rock. Any effects in Cell C3 are too small to represent at this scale. In Cell C1, K-feldspar is the primary dissolution mineral, which is primarily replaced by precipitation of illite, quartz, and montmorillonite. Similar, but lesser, effects are seen in Cell C2. Figure 2-37 shows change in porosity of the Icebox cap rock. During an initial model stabilization period, Cell C1 experiences an increase in porosity due to K-feldspar dissolution. However, the porosity gradually returns to its initial condition by Year 10. As the porosity scale shows, these changes are small, less than 0.0013 porosity units. Cells C2 and C3 experience no significant change in porosity during the 45 years of the simulation. The small net porosity changes from dissolution and precipitation in Cells C1 and C2, with essentially zero observed effect on Cell C3, suggest that geochemical change from exposure to CO₂ is very minor and will not cause substantive deterioration of the Icebox cap rock.

Table 2-15 Injection Stream Composition

Figure 2-35 Change in fluid pH vs time. Red line shows pH for the center of Cell C1 at 0.5 meters above the base of the Icebox cap rock. Yellow line shows Cell C2 at 1.5 meters above the cap rock base. Green line shows Cell C3 at 2.5 meters above the cap rock base.

Figure 2-36 Dissolution and precipitation of minerals in the Icebox cap rock. Dashed lines show results calculated for Cell C1 at 0.5 meters above the cap rock base. Solid lines show results for Cell C2 at 1.5 meters above the cap rock base. Results from Cell C3 at 2.5 meters above the cap rock base are not shown as they are too small to be seen at this scale.

Figure 2-37 Change in percent porosity of the Icebox cap rock. Red line shows porosity change calculated for Cell C1 at 0.5 meters above the cap rock base. Yellow line shows Cell C2 at 1.5 meters above the cap rock base. Green line shows Cell C3 at 2.5 meters above the cap rock base. Long-term change in porosity is minimal.

Table 2-16 Description of Zones of Confinement above the Immediate Upper Confining Zone (data based on the J-ROC1 well)

Figure 2-38 Isopach map of the interval between the top of the Black Island Formation and the top of the Swift Formation. This interval represents the primary and secondary confinement zones.

Figure 2-39 Isopach map of the interval between the top of the Inyan Kara Formation and the top of the Pierre Formation. This interval represents the tertiary confinement zone.

Figure 2-40 Structure map of the Deadwood B member shale across the greater Tundra SGS area.

Figure 2-41 Isopach map of the Deadwood B member shale across the Tundra SGS area.

Table 2-17 Deadwood B Member Shale Core Sample Porosity and Permeability from J-LOC1

2.4.2 Additional Overlying Confining Zones

Several other formations provide additional confinement above the Icebox. Impermeable rocks above the primary seal include the Roughlock Formation and the Red River D member, which make up the first additional group of confining formations (Table 2-16). Together with the Icebox, these formations are 612 ft thick and will isolate the Deadwood/Black Island Formations fluids from migrating upward into the next permeable interval, the Red River A, B, and C members (see Figure 2-38). Above the Red River Formation, >1,000 ft of impermeable rocks act as an additional seal between the Red River and Broom Creek, the next proposed storage complex. 876 ft of impermeable rocks separate the Broom Creek from the Inyan Kara and an additional 2,343 ft of impermeable rocks separates the Inyan Kara and the lowermost USDW, the Fox Hills Formation (see Figure 2-39). Confining layers above the Inyan Kara include the Skull Creek, Nowcastie, Mowry, Greenhorn, and Pierre Formations (Table 2-16).

No known transmissible faults are within these confining systems in the project area. These formations between the Deadwood, Broom Creek, and Inyan Kara and between the Inyan Kara and lowest USDW have demonstrated the ability to prevent the vertical migration of fluids throughout geologic time and are recognized as impermeable-flow barriers in the Williston Basin (Downey, 1986; Downey and Dinwiddie, 1988).

Carbonates of the Red River A, B, and C members comprise the first unit with relatively high porosity and permeability above the injection zone and primary sealing formation. The Red River represents the most likely candidate to act as an overlying pressure dissipation zone. The depth to the Red River Formation in the project area is approximately 8,438 ft, and the formation itself is about 450 ft thick. In the unlikely event of out-of-zone migration through the primary and secondary sealing formations, CO₂ would become trapped in the Red River Formation. Monitoring DYS (distributed temperature sensor) data for the Red River Formation using the downhole fiber optic cable in the proposed monitor well provides an additional opportunity for mitigation and remediation (Section 4.0).

Table 2-16. Description of Zones of Confinement above the Immediate Upper Confining Zone (data based on the J-ROC1 well)

Name of Formation	Lithology	Formation Top Depth, ft	Thickness, ft	Depth below Lowest Identified USDW, ft
Pierre	Shale	1,150	1862	0
Greenhorn	Shale	3,012	391	1,862
Mowry	Shale	3,403	56	2,253
Skull Creek	Shale	3,458	235	2,308
Swift	Shale	3,864	473	2,714
Rierdon	Shale	4,337	147	3,187
Piper (Kline member)	Limestone	4,484	110	3,334
Piper (Picard)	Shale	4,594	91	3,444
Opeche	Shale/mudstone	4,685	55	3,535
Amsden	Dolostone/anhydrite	4,974	247	3,824
Kibbey Lime	Limestone	5,384	31	4,234
Charles	Limestone/anhydrite	5,526	147	4,376
Bakken	Shale	6,926	10	5,776
Birdbear	Limestone	7,075	74	5,925
Duperow	Limestone/dolostone	7,149	272	5,999

Table 2-18. XRF Data for the Deadwood B Shale from the J-ROC1 Well

Table 2-19. Mineral Composition of the Deadwood B Shale, derived from XRD analysis of J1,OC-1 core samples Deadwood B Shale (10, 144 ft)

Figure 2-42. Change in fluid pH in the Deadwood B shale underlying confining layer. The red line shows the pH calculated at the center of Cell C1 at 0.5 meters below the Deadwood B top. The green line shows Cell C5 at 4.5 meters below the Deadwood B top.

Figure 43. CO₂ concentration (molarity) in the Deadwood B shale underlying confining layer for Cells C1-C19.

Figure 2-44. Dissolution and precipitation of minerals in the Deadwood B underlying confining layer. Dashed lines show results for Cell C1 at 0 to 1 meter below the Deadwood B top. Solid lines show results for Cell C2 at 1 to 2 meters below the Deadwood B.

Figure 2-45. Change in percent porosity in the Deadwood B underlying confining layer. The red line shows porosity change for Cell C1 at 0 to 1 meter below the Deadwood B top. The yellow line shows Cell C2 at 1 to 2 meters below the Deadwood B top. The green line shows Cell C1 at 2 to 3 meters below the Deadwood B top. Long-term change in porosity is minimal and stabilized. Cells C4-C19 showed similar results, with net porosity change being less than 0.3%.

Souris River	Dolostone/limestone	7,421	175	6,271
Dawson Bay	Dolostone	7,596	729	6,446
Gunton	Dolostone/limestone	8,325	39	7,175
Stoughton	Shale/limestone	8,364	91	7,214
Lower Red River	Limestone	8,645	488	7,495
Roughlock	Shale/limestone	9,133	25	7,983

2.4.3 Lower Confining Zones

The lower confining zone of the storage complex is the Deadwood B member shale. The Deadwood B member shale consists predominantly of shale with a consistent and correlative package of higher GR, moderate reactivity, higher neutron, moderate density, and high compressional sonic across the project area. The shale within the Deadwood B member is 9,791 ft below the surface and 34 ft thick at the Tundra SGS site (Figures 2-40 and 2-41, Table 2-10).

At 144 ft below the top of the Deadwood C-sand is an 80-ft-thick shaly layer of the Deadwood B member. Data acquired from the core plug samples taken from the Deadwood B member show porosity values ranging from 1.55% to 2.63% and permeability values from 0.0083 to 0.0177 mD (Table 2-17).

2.4.3.1 Mineralogy

Thin-section analysis and well logs show that the Deadwood B interval comprises carbonates and shale facies. The carbonates are composed mainly of calcite minerals and fossils and then by feldspar and quartz. The Deadwood B shows a tight formation characteristic where the permeability ranges from 0.0094 to 1.18 mD and porosity ranges from 1% to 8%.

XRD was performed, and the results confirm the observations made during core analyses and thin-section description.

XRF data show the Deadwood B shale mainly comprises CaO (35%), SiO₂ (30%), and Al₂O₃ (4%) (Table 2-18).

2.4.3.2 Geochemical Interaction

The Deadwood C-sand's underlying confining layer, the Deadwood B, was investigated using PIPEROC geochemical software. A vertically oriented 1D simulation was created using a stack of five cells, each cell 1 meter in thickness. The formation was exposed to CO₂ at the top boundary of the simulation and allowed to enter the system by advection and dispersion processes. The results were calculated at the center of each cell below the confining layer—CO₂ exposure boundary. The mineralogical composition of the Deadwood B was honored (Table 2-19). Formation brine composition was assumed the same as the known composition from the Deadwood sand injection zone above (previously shown in Table 2-14). The injection stream composition was as described by Minnkota (Table 2-15). The Deadwood B Formation temperature and pressure were adjusted from the Deadwood sand reservoir temperature and pressure conditions, 188°F and 4,357 psi, respectively. Two different pressure levels, 4,357 and 4,652 psi, were applied to the CO₂-saturated brine at the base of the Deadwood sand. These values represent the initial and potential pore pressure levels. The higher-pressure results are shown here to represent a potentially more rapid pace of geochemical change. These simulations were run for 45 years to represent 20 years of injection plus 25 years postinjection.

The results showed geochemical processes at work. Figures 2-42, 2-43, 2-44, and 2-45 show findings from the high-pressure, more extreme exposure case. Figure 2-42 shows change in fluid pH over 45 years of simulation time as CO₂ enters the system. Initial change in pH in all the cells from 6 to 5.8 is related to initial equilibration of the model. For the cell at the CO₂ interface, C1, the pH declines from its initial level of 6.0 to 5.3 after 4 years of injection and slowly declines further to 4.4 after the 25-year postinjection period. Similar, but progressively slower, pH change occurs for each cell that is more distant from the CO₂ interface. The pH for Cells 10–19 did not decline over the 45 years of simulation time. Figure 2-43 shows that CO₂ does not penetrate more than 9 meters (represented by Cell C9) within the 45 years simulated.

Figure 2-44 shows the changes in mineral dissolution and precipitation in grams per cubic meter. For Cell C1, K-feldspar is the primary dissolution mineral, with minor chlorite. Illite and quartz precipitation largely replace that dissolution. The reaction rate in the C1 cell dramatically slows after approximately 9 years, and cell geochemistry

stabilizes. As Cell C1 stabilizes, dissolution and precipitation begin in Cell C2, with minor amounts of chlorite dissolving and modest precipitation of dolomite.

Change in porosity (% units) of the Deadwood B underlying confining layer is displayed in Figure 2-45. The overall net porosity changes from dissolution and precipitation are minimal, less than a 0.2% change during the life of the simulation. Cell C1 shows an initial porosity increase of 0.1%, but this change is temporary, and the cell returns to its near-initial porosity value of 2.0%. Cells C2 and C3 undergo similar changes but with progressively longer time delay. At the end of the simulation, no significant net porosity changes were observed for these cells. These results suggest that the Deadwood B will not undergo significant geochemical change in the presence of CO₂ injection.

2.3.3 Mechanism of Geologic Confinement

For Tundra SGS, the initial mechanism for geologic confinement of CO₂ injected into the Deadwood Formation will be the cap rock (icebox interval), which will contain the initially buoyant CO₂ under the effects of relative permeability and capillary pressure. Lateral movement of the injected CO₂ will be restricted by residual gas trapping (relative permeability) and solubility trapping (dissolution of the CO₂ into the native formation brine), confining the CO₂ within the proposed storage reservoir, as identified in Figure 2-3. After the injected CO₂ becomes dissolved in the formation brine, the brine density will increase. This higher-density brine will ultimately sink in the storage formation (convective mixing). Over a much longer period (>100 years), mineralization of the injected CO₂ will ensure long-term, permanent geologic confinement. Injected CO₂ is not expected to adsorb to any of the mineral constituents of the target formation; therefore, this process is not considered to be a viable trapping mechanism in this project. Adsorption of CO₂ is a trapping mechanism notable in the storage of CO₂ in deep unminable coal seams.

Figure 2-20. Laboratory-derived mineralogic characteristics of the Black Island and Deadwood Formations.

Figure 2-21a. XRF data from the Black Island Formation from J-1, OC1.

Figure 2-21b. XRF data from the Upper Deadwood Formation, including the C, D, and E members from J-1, OC1.

NDAC 43-05-01-05 §1b(2)

(2) A geologic and hydrogeologic evaluation of the facility area, including an evaluation of all existing information on all geologic strata overlying the storage reservoir, including the immediate caprock containment characteristics and all subsurface zones to be used for monitoring. The evaluation must include any available geophysical data and assessments of any regional tectonic activity, local seismicity and regional or local fault zones, and a comprehensive description of local and regional structural or stratigraphic features. The evaluation must describe the storage reservoir's mechanisms of geologic confinement, including rock properties, regional pressure gradients, structural features, and adsorption characteristics with regard to the ability of that confinement to prevent migration of

d. A description of the storage reservoir's mechanisms of geologic confinement characteristics with regard to preventing migration of carbon dioxide beyond the proposed storage reservoir, including:
Rock properties
Regional pressure gradients
Adsorption processes

NDAC 43-05-01-05 §1b(2)†

carbon dioxide beyond the proposed storage reservoir. The evaluation must also identify any productive existing or potential mineral zones occurring within the facility area and any underground sources of drinking water in the facility area and within one mile [1.6] kilometers) of its outside boundary. The evaluation must include exhibits and plan view maps showing the following:

NDAC 43-05-01-05 §1b(2)(g)

(g) Identification of all structural spill points or stratigraphic discontinuities controlling the isolation of stored carbon dioxide and associated fluids within the storage reservoir.

- o Identification of all characteristics controlling the isolation of stored carbon dioxide and associated fluids within the storage reservoir, including:
 - Structural spill points
 - Stratigraphic discontinuities

2.3.3 Mechanism of Geologic Confinement

For Tundra SGS, the initial mechanism for geologic confinement of CO₂ injected into the Deadwood Formation will be the cap rock (loebox interval), which will contain the initially buoyant CO₂ under the effects of relative permeability and capillary pressure. Lateral movement of the injected CO₂ will be restricted by residual gas trapping (relative permeability) and solubility trapping (dissolution of the CO₂ into the native formation brine); confining the CO₂ within the proposed storage reservoir, as identified in Figure 2-3. After the injected CO₂ becomes dissolved in the formation brine, the brine density will increase. This higher-density brine will ultimately sink in the storage formation (convective mixing). Over a much longer period (>100 years), mineralization of the injected CO₂ will ensure long-term, permanent geologic confinement. Injected CO₂ is not expected to adsorb to any of the mineral constituents of the target formation; therefore, this process is not considered to be a viable trapping mechanism in this project. Adsorption of CO₂ is a trapping mechanism notable in the storage of CO₂ in deep unminable coal seams.

2.2.2.6 Seismic Survey

A 3-mi-long seismic source test and 6.3-mi² 3D seismic survey were acquired in 2019, and a 12-mi² 3D seismic survey and 21 mi of 2D seismic lines were acquired in 2020 (Figure 2-6). The 3D seismic data allowed for visualization of deep geologic formations at lateral spatial intervals as short as tens of feet. The 2D seismic data provided a means to connect the two 3D seismic data sets and ensure consistent interpretation across the entire Tundra SGS area. The seismic data were used for an assessment of the geologic structure, interpretation of interwell heterogeneity, and well placement. Data products generated from the interpretation and inversion of the 3D seismic data were used as inputs into the geologic model. Additionally, the geologic model that was informed by the seismic data was used to simulate migration of the CO₂ plume. These simulated CO₂ plumes were used to inform the testing and monitoring plan (Section 4.0).

The 3D seismic data and J-LOC1 and J-ROC1 well logs were used to interpret surfaces for the formations of interest within the survey area. These surfaces were converted to depth using the time-to-depth relationship derived from the J-LOC1 and J-ROC1 sonic logs. The depth-converted surfaces for the storage reservoir and upper and lower confining zones were used as inputs for the geologic model. These surfaces captured detailed information about the structure and varying thickness of the formations between wells. Interpretation of the 3D seismic data suggests there are no major stratigraphic pinch-outs or structural features with associated spill points in the Black Island/Deadwood storage complex in the Tundra SGS area. There were also no structural features, faults, or discontinuities that would cause a concern about seal integrity in the strata above the Black Island Formation observed in the seismic data.

In addition, the 3D seismic data were used to gain a better understanding of interwell heterogeneity across the Tundra SGS area for petrophysical property distributions. Acoustic impedance volumes were created using the 3D seismic and petrophysical data from the J-LOC1 and J-ROC1 wells (e.g., dipole sonic and density logs) (Figure 2-7). The acoustic

Figure 2-20 Laboratory-derived mineralogic characteristics of the Black Island and Deadwood Formations

Figure 2-21a XRF data from the Black Island Formation from J-LOC1

Figure 2-21b XRF data from the Upper Deadwood Formation, including the C, D, and E members from J-LOC1

Figure 2-6 Map showing the 2D and 3D seismic surveys in the Tundra SGS area

Figure 2-7 Left: cross section of the inverted acoustic impedance volume for the western seismic 3D survey that transects the J-LOC1 well. The acoustic impedance log calculated from the J-LOC1 sonic and density logs is shown on the inset panel. Right: cross section of the inverted acoustic impedance volume for the eastern 3D survey

NDAC 43-05-01-05 §1b(2)(g)

<p>NDAC 43-05-01-05 §1b(2)c</p> <p>(c) Any regional or local faulting.</p>	<p>f. Any regional or local faulting.</p>	<p>impedance volumes were used to classify lithofacies of the Deadwood Formation and distribute lithofacies through the geologic model as well as inform petrophysical property distribution in the geologic model.</p> <p>2.5 Faults, Fractures, and Seismic Activity</p> <p>In the Tundra SGS area, no known or suspected regional faults or fractures with sufficient permeability and vertical extent to allow fluid movement between formations have been identified through site-specific characterization activities, previous studies, or oil and gas exploration activities. Features interpreted from the 3D seismic data, including paleochannels, a flexure, and a suspected fault in the Precambrian basement, are discussed in this section as well as the data that support the low probability that these features will interfere with containment. The following section also discusses the seismic history of North Dakota and the low probability that seismic activity will interfere with containment.</p> <p>2.5.1 Interpreted Features</p> <p>The analysis of 3D seismic data acquired specifically for Tundra SGS in 2019 and 2020 (Figure 2-6) revealed evidence for suspected paleochannels or preferential erosional zones at the top of the Precambrian basement. Maps of the seismic reflection event interpreted to be the Precambrian–Deadwood contact suggest these features are fairly linear in nature (Figure 2-55). In cross-sectional view of the seismic data, these features appear as depressions in the top of the Precambrian and the lower portion of the Deadwood (Figure 2-56 and 2-57). The isopach values depicted in Figure 2-58 suggest erosional relief on the Precambrian surface of nearly 460 ft. The absence of thickness changes in the Winnipeg or other formations overlying the Deadwood associated with these features suggest these features were filled in during the deposition of the Deadwood.</p> <p>In the western 3D seismic survey data, there is no indication that the identified features impact the intervals above the lower Deadwood. Additionally, there is no indication of offset reflections above or below these features in the western 3D seismic survey data that would suggest any deformation or movement associated with these features. There is no evidence to suggest that these interpreted paleochannel features have sufficient permeability or vertical extent to interfere with containment.</p> <p>There is a flexure in the eastern 3D seismic data where the seismic reflections above the interpreted Precambrian–Deadwood boundary through the Red River Formation appear to dip or sag down (Figure 2-59). These depressions are interpreted to be draped over one of the interpreted paleochannels located at the Precambrian–Deadwood boundary (Figure 2-57). A deep structure was interpreted in the Precambrian basement below this paleochannel and flexure. This structure appears to be a low-dipping thrust fault that terminates at the top of the Precambrian basement (Figure 2-60). The location of this Precambrian fault provides evidence that there was likely preferential erosion along the exposed Precambrian fault trace during the deposition of the Deadwood Formation. The dip of the Precambrian fault is low-angle whereas the flexure above the paleochannel feature is near-vertical, supporting the interpretation of the fault terminating at the top of the Precambrian basement. The seismic interpretation indicates that the interpreted fault in the Precambrian basement is dipping at –25 degrees relative to horizontal being 0 degrees. The flexure observed in the overlying sediments is likely associated with postdepositional differential compaction above the paleochannel or slump due to movement along this low-angle basement fault. There is no evidence to suggest that this flexural feature has sufficient permeability to interfere with containment.</p>	<p>Figure 2-55 Map showing the time structure of the seismic reflection event interpreted to be the Precambrian–Deadwood contact</p> <p>Figure 2-56 Cross-sectional view of the 3D seismic data through one of the linear trends in the West 3D seismic survey. Identified formations include Roughlock (green), Deadwood (blue), and Precambrian (yellow). The red box indicates the area that corresponds to the linear feature. Figure 2-55 shows the location of this cross section.</p> <p>Figure 2-57 Cross-sectional view of the 3D seismic data through one of the linear trends in the east 3D seismic survey. Identified formations include Roughlock (green), Deadwood (blue), and Precambrian (yellow). Depressions along the top of the Precambrian suggest the presence of paleochannels. Figure 2-55 shows the location of this cross section.</p> <p>Figure 2-58 Map showing the thickness of the interval from the Precambrian erosional surface up through the top of the Deadwood Formation calculated using the seismic data. The linear trends correspond to areas of increased thickness.</p> <p>Figure 2-59 Map showing the time structure of the seismic reflection event interpreted to be the top of the Red River Formation. The line shows the location of the interpreted paleochannel that underlies the flexure.</p> <p>Figure 2-60 Cross-sectional view of the 3D seismic data through one of the linear trends in the east 3D seismic survey. Identified formations include Deadwood (blue) and Precambrian (yellow). The location of the interpreted low-angle thrust fault is shown by the green dashed line. Cross Section C-C' runs parallel to Cross Section B-B' shown in Figure 2-55 and is located 160 ft to the west of Cross Section B-B'.</p>	<p>Figure 2-55 Map showing the time structure of the seismic reflection event interpreted to be the Precambrian–Deadwood contact</p> <p>Figure 2-56 Cross-sectional view of the 3D seismic data through one of the linear trends in the West 3D seismic survey. Identified formations include Roughlock (green), Deadwood (blue), and Precambrian (yellow). The red box indicates the area that corresponds to the linear feature. Figure 2-55 shows the location of this cross section.</p> <p>Figure 2-57 Cross-sectional view of the 3D seismic data through one of the linear trends in the east 3D seismic survey. Identified formations include Roughlock (green), Deadwood (blue), and Precambrian (yellow). Depressions along the top of the Precambrian suggest the presence of paleochannels. Figure 2-55 shows the location of this cross section.</p> <p>Figure 2-58 Map showing the thickness of the interval from the Precambrian erosional surface up through the top of the Deadwood Formation calculated using the seismic data. The linear trends correspond to areas of increased thickness.</p> <p>Figure 2-59 Map showing the time structure of the seismic reflection event interpreted to be the top of the Red River Formation. The line shows the location of the interpreted paleochannel that underlies the flexure.</p> <p>Figure 2-60 Cross-sectional view of the 3D seismic data through one of the linear trends in the east 3D seismic survey. Identified formations include Deadwood (blue) and Precambrian (yellow). The location of the interpreted low-angle thrust fault is shown by the green dashed line. Cross Section C-C' runs parallel to Cross Section B-B' shown in Figure 2-55 and is located 160 ft to the west of Cross Section B-B'.</p>
<p>NDAC 43-05-01-05 §1b(2)(j)</p> <p>(j) The location, orientation, and properties of known or suspected faults and fractures that may transect the confining</p>	<p>g. Properties of known or suspected faults and fractures that may transect the confining zone in the area of review.</p> <ul style="list-style-type: none"> Location Orientation Determination of the probability that they would interfere with containment 	<p>2.5.1 Interpreted Features</p> <p>The analysis of 3D seismic data acquired specifically for Tundra SGS in 2019 and 2020 (Figure 2-6) revealed evidence for suspected paleochannels or preferential erosional zones at the top of the Precambrian basement. Maps of the seismic reflection event interpreted to be the Precambrian–Deadwood contact suggest these features are fairly linear in nature (Figure 2-55). In cross-sectional view of the seismic data, these features appear as depressions in the top of the Precambrian and the lower portion of the Deadwood (Figure 2-56 and 2-57). The isopach values depicted in Figure 2-58 suggest erosional relief on the Precambrian surface of nearly 460 ft. The absence of thickness changes in the Winnipeg or</p>	<p>Figure 2-55 Map showing the time structure of the seismic reflection event interpreted to be the Precambrian–Deadwood contact</p> <p>Figure 2-56 Cross-sectional view of the 3D seismic data through one of the linear trends in the West 3D seismic survey. Identified formations include Roughlock (green),</p>	<p>Figure 2-55 Map showing the time structure of the seismic reflection event interpreted to be the Precambrian–Deadwood contact</p> <p>Figure 2-56 Cross-sectional view of the 3D seismic data through one of the linear trends in the West 3D seismic survey. Identified formations include Roughlock (green),</p>

	<p>zone in the area of review, and a determination that they would not interfere with containment.</p>		<p>other formations overlying the Deadwood associated with these features suggest these features were filled in during the deposition of the Deadwood.</p> <p>In the western 3D seismic survey data, there is no indication that the identified features impact the intervals above the lower Deadwood. Additionally, there is no indication of offset reflections above or below these features in the western 3D seismic survey data that would suggest any deformation or movement associated with these features. There is no evidence to suggest that these interpreted paleochannel features have sufficient permeability or vertical extent to interfere with containment.</p> <p>There is a flexure in the eastern 3D seismic data where the seismic reflections above the interpreted Precambrian-Deadwood boundary through the Red River Formation appear to dip or sag down (Figure 2-59). These depressions are interpreted to be draped over one of the interpreted paleochannels located at the Precambrian-Deadwood boundary (Figure 2-57). A deep structure was interpreted in the Precambrian basement below this paleochannel and flexure. This structure appears to be a low-dipping thrust fault that terminates at the top of the Precambrian basement (Figure 2-60). The location of this Precambrian fault provides evidence that there was likely preferential erosion along the exposed Precambrian fault trace during the deposition of the Deadwood Formation. The dip of the Precambrian fault is low-angle whereas the flexure above the paleochannel feature is near-vertical, supporting the interpretation of the fault terminating at the top of the Precambrian basement. The seismic interpretation indicates that the interpreted fault in the Precambrian basement is dipping at ~25 degrees relative to horizontal being 0 degrees. The flexure observed in the overlying sediments is likely associated with postdepositional differential compaction above the paleochannel or slump due to movement along this low-angle basement fault. There is no evidence to suggest that this flexural feature has sufficient permeability to interfere with containment.</p>	<p>Deadwood (blue), and Precambrian (yellow). The red box indicates the area that corresponds to the linear feature. Figure 2-55 shows the location of this cross section.</p> <p>Figure 2-57. Cross-sectional view of the 3D seismic data through one of the linear trends in the east 3D seismic survey. Identified formations include Roughlock (green), Deadwood (blue), and Precambrian (yellow). Depressions along the top of the Precambrian suggest the presence of paleochannels. Figure 2-55 shows the location of this cross section.</p> <p>Figure 2-58. Map showing the thickness of the interval from the Precambrian erosional surface up through the top of the Deadwood Formation calculated using the seismic data. The linear trends correspond to areas of increased thickness.</p> <p>Figure 2-59. Map showing the time structure of the seismic reflection event interpreted to be the top of the Red River Formation. The line shows the location of the interpreted paleochannel that underlies the flexure.</p> <p>Figure 2-60. Cross-sectional view of the 3D seismic data through one of the linear trends in the east 3D seismic survey. Identified formations include Deadwood (blue) and Precambrian (yellow). The location of the interpreted low-angle thrust fault is shown by the green dashed line. Cross Section C-C' runs parallel to Cross Section B-B' shown in Figure 2-55 and is located 160 ft to the west of Cross Section B-B'.</p> <p>Figure 2-55. Map showing the time structure of the seismic reflection event interpreted to be the Precambrian-Deadwood contact.</p> <p>Figure 2-56. Cross-sectional view of the 3D seismic data through one of the linear trends in the West 3D seismic survey. Identified formations include Roughlock (green), Deadwood (blue), and Precambrian (yellow). The red box indicates the area that corresponds to the linear feature. Figure 2-55 shows the location of this cross section.</p> <p>Figure 2-57. Cross-sectional view of the 3D seismic data through one of the linear trends in the east 3D seismic survey. Identified formations include Roughlock (green), Deadwood (blue), and Precambrian (yellow).</p>
<p>NDAC 43-05-01-05 §1b(2) ¶ & §1b(2)(m)</p>	<p>NDAC 43-05-01-05 §1b(2)</p> <p>(2) A geologic and hydrogeologic evaluation of the facility area, including an evaluation of all existing information on all geologic strata overlying the storage reservoir, including the immediate caprock containment characteristics and all subsurface zones to be used for monitoring. The evaluation must</p>	<p>h. Information on any regional tectonic activity, and the seismic history, including:</p> <ul style="list-style-type: none"> The presence and depth of seismic sources, Determination of the probability that seismicity would interfere with containment, 	<p>2.5 Faults, Fractures, and Seismic Activity</p> <p>In the Tundra SGS area, no known or suspected regional faults or fractures with sufficient permeability and vertical extent to allow fluid movement between formations have been identified through site-specific characterization activities, previous studies, or oil and gas exploration activities. Features interpreted from the 3D seismic data, including paleochannels, a flexure, and a suspected fault in the Precambrian basement, are discussed in this section as well as the data that support the low probability that these features will interfere with containment. The following section also discusses the seismic history of North Dakota and the low probability that seismic activity will interfere with containment.</p> <p>2.5.1 Interpreted Features</p> <p>The analysis of 3D seismic data acquired specifically for Tundra SGS in 2019 and 2020 (Figure 2-6) revealed evidence for suspected paleochannels or preferential erosional zones at the top of the Precambrian basement. Maps of the seismic reflection event interpreted to be the Precambrian-Deadwood contact suggest these features are fairly linear in nature (Figure 2-55). In cross-sectional view of the seismic data, these features appear as depressions in the top of the Precambrian and the lower portion of the Deadwood (Figure 2-56 and 2-57). The isopach values depicted in Figure 2-58 suggest erosional relief on the Precambrian surface of nearly 460 ft. The absence of thickness changes in the Winnipeg or other formations overlying the Deadwood associated with these features suggest these features were filled in during the deposition of the Deadwood.</p>	<p>Figure 2-55. Map showing the time structure of the seismic reflection event interpreted to be the Precambrian-Deadwood contact.</p> <p>Figure 2-56. Cross-sectional view of the 3D seismic data through one of the linear trends in the West 3D seismic survey. Identified formations include Roughlock (green), Deadwood (blue), and Precambrian (yellow). The red box indicates the area that corresponds to the linear feature. Figure 2-55 shows the location of this cross section.</p> <p>Figure 2-57. Cross-sectional view of the 3D seismic data through one of the linear trends in the east 3D seismic survey. Identified formations include Roughlock (green), Deadwood (blue), and Precambrian (yellow).</p>

include any available geophysical data and assessments of any regional tectonic activity, local seismicity and regional or local fault zones, and a comprehensive description of local and regional structural or stratigraphic features. The evaluation must describe the storage reservoir's mechanisms of geologic confinement, including rock properties, regional pressure gradients, structural features, and adsorption characteristics with regard to the ability of that confinement to prevent migration of carbon dioxide beyond the proposed storage reservoir. The evaluation must also identify any productive existing or potential mineral zones occurring within the facility area and any underground sources of drinking water in the facility area and within one mile [1.61 kilometers] of its outside boundary. The evaluation must include exhibits and plan view maps showing the following:

NDAC 43-05-01-05
§16(2)(m)
(m) Information on the seismic history, including the presence and depth of seismic sources and a

In the western 3D seismic survey data, there is no indication that the identified features impact the intervals above the lower Deadwood. Additionally, there is no indication of offset reflections above or below these features in the western 3D seismic survey data that would suggest any deformation or movement associated with these features. There is no evidence to suggest that these interpreted paleochannel features have sufficient permeability or vertical extent to interfere with containment.

There is a flexure in the eastern 3D seismic data where the seismic reflections above the interpreted Precambrian-Deadwood boundary through the Red River Formation appear to dip or sag down (Figure 2-59). These depressions are interpreted to be draped over one of the interpreted paleochannels located at the Precambrian-Deadwood boundary (Figure 2-57). A deep structure was interpreted in the Precambrian basement below this paleochannel and flexure. This structure appears to be a low-dipping thrust fault that terminates at the top of the Precambrian basement (Figure 2-60). The location of this Precambrian fault provides evidence that there was likely preferential erosion along the exposed Precambrian fault trace during the deposition of the Deadwood Formation. The dip of the Precambrian fault is low-angle whereas the flexure above the paleochannel feature is near-vertical, supporting the interpretation of the fault terminating at the top of the Precambrian basement. The seismic interpretation indicates that the interpreted fault in the Precambrian basement is dipping at -25 degrees relative to horizontal being 0 degrees. The flexure observed in the overlying sediments is likely associated with postdepositional differential compaction above the paleochannel or slump due to movement along this low-angle basement fault. There is no evidence to suggest that this flexural feature has sufficient permeability to interfere with containment.

2.5.5.1 Precambrian Fault Geomechanics Study

Geomechanical modeling was done to determine the potential risk of induced seismicity associated with the interpreted Precambrian fault and planned injection activities. The 3D seismic data were used to estimate the dip and strike of the interpreted fault, including uncertainty ranges on both for input into this modeling. A 1D stress model was built from the J-LOC well data using the density, compressional sonic, and shear sonic well logs. The pore pressure is assumed equivalent to hydrostatic pressure, with a slight overpressure in the Broom Creek Formation. Overburden stress was estimated by integrating the density data and projecting the density trend to surface. The principal horizontal stresses SH_{min} and SH_{max} were estimated using the modified Eaton poroelastic model from Theocletis and Plumb (1994) and calibrated to closure pressure measurements in the Deadwood, Broom Creek, and Inyan Kara Formations. Static elastic rock property inputs were calibrated to core measurements. The most conservative approach was taken by choosing the largest differential stress model to conduct the analysis, as it represented the highest risk scenario. A stress trend was developed to represent a consistent stress trend through the Deadwood Formation that was an equivalent trend through the highest-magnitude stresses. For the purposes of failure analysis on the existing feature in the seismic interpretation, that stress trend was projected down into the Precambrian basement.

To understand the highest possible risk scenario, the scenario where the interpreted Precambrian fault extends into the Deadwood Formation was considered even though the seismic data do not suggest that it does. Conservative estimates for friction coefficient (10) and cohesion (0) were used in this analysis. Given those conditions and the state of stress modeled in the Deadwood, the failure analysis indicated that a pressure increase of 3,600-4,800 psi would be required to induce shear failure on that feature (Figure 2-61).

The maximum expected pressure change in the Deadwood due to planned injection activities does not exceed 1,800 psi, which is well below the 3,600-4,800-psi pressure threshold for failure (Figure 2-62). Additionally, the injection interval is approximately 120 ft above the Precambrian-Deadwood boundary and the expected pressure change due to planned injection activities at the Precambrian-Deadwood boundary does not exceed 60 psi. Analysis of the geomechanics study results as applied to the characteristics of the interpreted Precambrian fault and site-specific geomechanical data suggests planned injection activities will not cause induced seismicity.

Additionally, sensitivity analysis was run using the publicly available Fault Slip Potential tool using the inputs of friction coefficient, SH_{max} azimuth, fault dip, fault strike, pore pressure, SH_{max} magnitude, SH_{min} magnitude, and overburden magnitude. The results proved insensitive to all inputs except the dip of the fault. At the low-angle dip of the fault, there is very low risk of failure given the interpretation of the state of stress.

2.5.2 Seismic Activity

The Williston Basin is a tectonically stable region of the North American Craton. Zhou and others (2008) summarize that "the Williston Basin as a whole is in an overburden compressive stress regime," which could be attributed to the general

Depressions along the top of the Precambrian suggest the presence of paleochannels. Figure 2-55 shows the location of this cross section.

Figure 2-58. Map showing the thickness of the interval from the Precambrian erosional surface up through the top of the Deadwood Formation calculated using the seismic data. The linear trends correspond to areas of increased thickness.

Figure 2-59. Map showing the time structure of the seismic reflection event interpreted to be the top of the Red River Formation. The line shows the location of the interpreted paleochannel that underlies the flexure.

Figure 2-60. Cross-sectional view of the 3D seismic data through one of the linear trends in the east 3D seismic survey. Identified formations include Deadwood (blue) and Precambrian (yellow). The location of the interpreted low-angle thrust fault is shown by the green dashed line. Cross Section C-C' runs parallel to Cross Section B-B' shown in Figure 2-55 and is located 160 ft to the west of Cross Section B-B'.

Figure 2-61. Mohr circle depiction of the stress state at the depth of the Deadwood Formation indicates a pressure window of 3,600 to 4,800 psi to create failure on the fault represented by the pink dots. Pink dots represent the strike and dip values for the fault interpreted from the seismic data relative to in situ stress orientations.

Figure 2-62. Map showing the maximum pressure change expected within the injection zone from the proposed injection activities. The location of the interpreted paleochannel and flexure is indicated by the red line.

Table 2-25. Summary of Seismic Events Reported to Have Occurred in North Dakota (from Anderson, 2016)

Figure 2-63. Location of major faults, tectonic boundaries, and seismic events in North Dakota (modified from Anderson, 2016). The black dots indicate seismic event locations listed in Table 2-24.

Figure 2-64. Probabilistic map showing how often scientists expect damaging seismic event shaking around the United States (U.S.)

<p>NDAC 43-05-01-05 §1b(2) ¶ NDAC 43-05-01-05 §1b(2)(n)</p>	<p>determination that the seismicity would not interfere with containment.</p>	<p>i) Illustration of the regional geology, hydrogeology, and the geologic structure of the storage reservoir area: Geologic maps Topographic maps Cross sections</p>	<p>stability of the North American Craton. Interpreted structural features associated with tectonic activity in the Williston Basin in North Dakota include anticlinal and synclinal structures in the western half of the state, lineaments associated with Precambrian basement block boundaries, and faults (North Dakota Industrial Commission, 2019)</p>	<p>Geological Survey, 2019). The map shows there is a low probability of damaging seismic events occurring in North Dakota</p>
	<p>NDAC 43-05-01-05 §1b(2) (2) A geologic and hydrogeologic evaluation of the facility area, including an evaluation of all existing information on all geologic strata overlying the storage reservoir, including the immediate caprock containment characteristics and all subsurface zones to be used for monitoring. The evaluation must include any available geophysical data and assessments of any regional tectonic activity, local seismicity and regional or local fault zones, and a comprehensive description of local and regional structural or stratigraphic features. The evaluation must describe the storage reservoir's mechanisms of geologic confinement,</p>		<p>Between 1870 and 2015, 13 seismic events were detected within the North Dakota portion of the Williston Basin (Table 2-25) (Anderson, 2016). Of these 13 seismic events, only three occurred along one of the eight interpreted Precambrian basement faults in the North Dakota portion of the Williston Basin (Figure 2-63). The seismic event recorded closest to the Tundra SGS storage facility area occurred 39.6 mi from the J-ROC1 well near Huff, North Dakota (Table 2-25). The magnitude of this seismic event is estimated to have been 4.4</p>	
			<p>Studies completed by the U.S. Geological Survey (USGS) indicate there is a low probability of damaging seismic events occurring in North Dakota, with less than two damaging seismic events predicted to occur over a 10,000-year time period (Figure 2-64) (U.S. Geological Survey, 2019). A 1-year seismic forecast (including both induced and natural seismic events) released by USGS in 2016 determined North Dakota has very low risk (less than 1% chance) of experiencing any seismic events resulting in damage (U.S. Geological Survey, 2016). Frohlich and others (2015) state there is very little seismic activity near the injection wells in the Williston Basin. They noted only two historic seismic events in North Dakota that could be associated with nearby oil and gas activities. These results indicate relatively stable geologic conditions in the region surrounding the potential injection site. Based on the review and assessment of 1) the USGS studies, 2) the characteristics of the Black Island and Deadwood injection zone and upper and lower confining zones, 3) the low risk of induced seismicity due to the basin stress regime, and 4) the history of recorded seismic events, seismic activity is not expected to interfere with containment of the maximum volume of CO₂ proposed to be injected annually over the life of this project</p>	
			<p>2.3 Storage Reservoir (Injection Zone) Regionally, the Black Island and Deadwood Formations are laterally extensive (Figure 2-8). The Black Island comprises high-energy shallow marine sandstone (permeable storage intervals) and shale (impermeable layers). The sandy members (C-sand and E member) of the Deadwood Formation comprise reworked quartz arenites of marginal marine environment (Figure 2-9). The Deadwood Formation unconformably overlies the Precambrian basement and is unconformably overlain by the sands of the Black Island Formation followed by the conformable Icebox Formation (Figure 2-3).</p>	<p>Figure 2-8. Areal extent of the Deadwood Formation in North Dakota (modified from Nesheim, 2012b).</p>
			<p>At J-ROC1, the Deadwood C-sand member is made up of 50 ft of sandstone and is located at a depth of 9,548 ft. Across the model area, the Deadwood C-sand member varies in thickness from 40 to 88 ft, with an average thickness of 64 ft. Based on offset well data and geologic model characteristics, the Deadwood C-sand member is 100% sandstone. The Deadwood E member and Black Island Formations are made up of 69 ft of sandstone and 19 ft of dolostone and limestone at J-ROC1 and are located at a depth of 9,283 ft. Across the project area, the Deadwood E member varies in thickness from 0 to 139 ft, with an average thickness of 81 ft. The Black Island Formation varies in thickness from 14 to 77 ft, with an average of 36 ft. Based on offset well data and geologic model characteristics, the net reservoir thickness within the project area ranges from 63 to 287 ft, with an average of 165 ft (Figure 2-10).</p>	<p>Figure 2-9. Type log showing the interpreted Deadwood members within the Williston Basin (Lefever and others, 1987).</p>
			<p>The well log signatures for the Black Island and Deadwood storage complex are consistent and predictable across the project area. The following are the correlation definitions used to indicate the reservoir and confining zones (Figure 2-11):</p>	<p>Figure 2-10. Isopach map of the Black Island and Deadwood Formations in the simulation model extent</p>
			<ul style="list-style-type: none"> • The Icebox Formation is indicated at the transitions between a moderate GR, higher resistivity, low neutron, high density, and moderate compressional sonic for the base of the Roughlock Formation to the high GR, low resistivity, high neutron, high density, and high compressional sonic. The Icebox Formation is correlative across the project area. • The Black Island Formation is indicated by the transition from the Icebox Formation to a relatively low GR, low neutron, high density, and low compressional sonic. The Black Island has interbedded high-GR and moderate-resistivity sections. • The Deadwood Formation (Deadwood E member) is indicated by a transition from the base high GR signature of the Black Island Formation to a low GR signature, lower neutron, higher density, and lower compressional sonic. The Deadwood E thins from west to east across the project area. • The Deadwood D member (base of Deadwood E member) is indicated by a transition to moderate to higher GR from top to base, higher resistivity, low neutron, high density, and low to higher compressional sonic from top to base. 	<p>Figure 2-11. Well log display of the interpreted lithologies of the Roughlock, Icebox, Black Island, Deadwood, and Precambrian in J-ROC1</p>
				<p>Figure 2-12a. Regional well log stratigraphic cross sections of the Roughlock, Icebox, Black Island, and Deadwood Formations and the Precambrian basement flattened on the top of the Precambrian basement. Logs displayed in tracks from left to right are 1) GR (green) and caliper (red), 2) delta time (blue), and 3) interpreted lithology log.</p>
				<p>Figure 2-12b. Regional well log cross sections showing the structure of the Roughlock, Icebox, Black Island, and Deadwood Formations and the Precambrian basement. Logs displayed in tracks from left to right are 1) GR (green) and caliper (red) and 2) delta time (blue)</p>

including rock properties, regional pressure gradients, structural features, and adsorption characteristics with regard to the ability of that confinement to prevent migration of carbon dioxide beyond the proposed storage reservoir. The evaluation must also identify any productive existing or potential mineral zones occurring within the facility area and any underground sources of drinking water in the facility area and within one mile (1.61 kilometers) of its outside boundary. The evaluation must include exhibits and plan view maps showing the following:

NDAC 43-05-01-05 §1b(2)(n)
 (n) Geologic and topographic maps and cross sections illustrating regional geology, hydrogeology, and the geologic structure of the facility area, and

- The Deadwood C member is the transition between the high GR of the Deadwood D member and moderate GR, higher resistivity, low neutron, high density, and low compressional sonic. The Deadwood C-sand member at the base of the Deadwood C member is indicated by a section of low GR (10 API), low resistivity, moderate neutron, moderate density, and moderate compressional sonic.
- The Deadwood B member (base of Deadwood C-sand member) is indicated by the transition from a low GR signature of the Deadwood C-sand member to a high GR, higher resistivity, low neutron, high density, and higher compressional sonic.
- The Deadwood B member shale unit is indicated by a higher GR, moderate resistivity, higher neutron, moderate density, and high compressional sonic. This unit is contained within the Deadwood B member and can be correlated across the project area.
- The Precambrian basement is indicated by a change from low to relatively high GR, low-to-moderate resistivity, and a lower compressional sonic character that can be correlated across the project area.

Seismic data collected as part of site characterization efforts (Figure 2-6) were used to reinforce structural correlation and thickness estimations of the storage reservoir. The combined structural correlation and analyses indicate that there should be few-to-no major reservoir stratigraphic discontinuities near J-LOC1 and J-ROC1 (Figures 2-12a and 2-12b). The Deadwood E member pinches out 12.5 mi to the east of the J-ROC1 site. A structure map of the Deadwood and Black Island Formations shows no detectable features (e.g., folds, domes, or fault traps) with associated spill points in the project area (Figure 2-13).

For additional information, go to Section 2.3 of the Tundra SGS SFP.

Table 2-1. Formations Comprising the Tundra SGS CO₂ Storage Complex

Formation	Purpose	Average Thickness at	Average Depth	Lithology
		Tundra SGS Site, ft	Tundra SGS Site, ft TVD	
Icebox	Upper confining zone	118 (58 to 176)	9,308	Shale
Black Island and Deadwood E member	Storage reservoir (i.e., injection zone)	118 (35 to 202)	9,427	Sandstone, shale, dolostone, limestone
Deadwood C member sand	Storage reservoir (i.e., injection zone)	64 (40 to 88)	9,773	Sandstone
Deadwood B member shale	Lower confining zone	34 (20 to 49)	9,791	Shale

Table 2-5. Description of CO₂ Storage Reservoir (injection zone) at the J-LOC1 Well

Injection Zone Properties			
Property	Description		
Formation Name	Black Island, Deadwood E member, and Deadwood C-sand member		
Lithology	Sandstone, dolostone, limestone		
Formation Top Depth, ft	9782.2, 9820.9, and 10,077.4		
Thickness, ft	38.9, 92.3, and 60.9		
Capillary Entry Pressure (CO ₂ /Brine), psi	0.16		
Geologic Properties			
Formation	Property	Laboratory Analysis	Model Property Distribution

Figure 2-13 Structure map of the Black Island and Deadwood Formations across the simulation model extent

Table 2-5 Description of CO₂ Storage Reservoir (injection zone) at the J-LOC1 Well

Figure 2-14 Cross section of the Tundra SGS CO₂ storage complex from the geologic model showing lithologies distribution in the Deadwood Formation. Depths are referenced to mean sea level.

Figure 2-15 Vertical distribution of core-derived porosity and permeability values in the Tundra SGS CO₂ storage complex.

Table 2-6 Deadwood Microfracture Results from J-LOC1

Table 2-10 Properties of Upper and Lower Confining Zones at the J-LOC1 Well

Figure 2-29 Areal extent of the Icebox Formation in western North Dakota (modified from Nesheim, 2012a)

Figure 2-30 Structure map of the upper confining zone across the simulation model extent

Figure 2-31 Isopach map of the upper confining zone across the simulation model extent

Figure 2-32 Well log display of the upper confining zone at the J-ROC1 well

Figure 2-33 J-LOC1 Icebox Formation MDI microfracture in situ stress test pump cycle graph at 9,749.5 ft

Figure 2-34 J-LOC1 Icebox Formation MDI microfracture in situ stress test pump cycle graph at 9,751.2 ft

Table 2-11 Icebox Core Sample Porosity and Permeability from J-LOC1

Table 2-16 Description of Zones of Confinement above the Immediate Upper Confining Zone (data based on the J-ROC1 well)

Figure 2-38 Isopach map of the interval between the top of the Black Island Formation

Black Island (sandstone)	Porosity, %*	8.0 (3.4–10.3)	5.6 (1.1–14.8)
	Permeability, mD**	3.7 (0.0019–157)	0.805 (<0.0001–96.0)
Deadwood E Member (sandstone)	Porosity, %	10 (6.85–14.43)	7.0 (0–17.7)
	Permeability, mD	5.63 (0.0325–2,060)	3.88 (<0.0001–4549.2)
Deadwood C-Sand Member	Porosity, %	7.6 (1.01–14.69)	7.6 (0.3–17.2)
	Permeability, mD	11 (0.0018–1140)	7.03 (<0.0001–830.3)

2.4 Confining Zones

The confining zones for the Deadwood and Black Island Formations are the overlying Icebox Formation and underlying Deadwood B member shale (Figure 2-3, Table 2-10). All three units, the Icebox Formation, Deadwood B member shale, and Precambrian basement, consist of impermeable rock layers.

Table 2-10. Properties of Upper and Lower Confining Zones at the J-LOC1 Well

Confining Zone Properties	Upper Confining Zone	Lower Confining Zone
Formation Name	Icebox	Deadwood B member shale
Lithology	Shale	Shale
Formation Top Depth, ft	9,308	9,791
Thickness, ft	118	34
Porosity, % (core data)*	3.6***	2.0
Permeability, mD (core data)**	0.00002***	0.0103
Capillary Entry Pressure (CO ₂ /brine), psi	845	176****
Depth below Lowest Identified USDW, ft	8,097	8,580

2.4.1 Upper Confining Zone

In the Tundra SGS area, the Icebox consists of shale. This upper confining zone is laterally extensive across the project area (Figures 2-29 and 2-30) 9,308 ft below the land surface and 118 ft thick at the Tundra SGS site (Table 2-10 and Figure 2-31). The upper confining zone has sufficient areal extent and integrity to contain the injected CO₂. The upper confining zone is free of transmissive faults and fractures (Section 2.3). The contact between the underlying sandstone of the Black Island Formation is conformable and can be correlated across the project area. The transition from the Icebox to the Black Island is indicated by a relatively low GR, low neutron, high density, and low compressional sonic across the contact (Figure 2-32).

and the top of the Swift Formation. This interval represents the primary and secondary confinement zones.

Figure 2-39. Isopach map of the interval between the top of the Inyan Kara Formation and the top of the Pierre Formation. This interval represents the tertiary confinement zone.

Figure 2-40. Structure map of the Deadwood B member shale across the greater Tundra SGS area.

Figure 2-41. Isopach map of the Deadwood B member shale across the Tundra SGS area.

Table 2-17. Deadwood B Member Shale Core Sample Porosity and Permeability from J-LOC1.

Table 3-6. Description of Zones of Confinement above the Immediate Upper Confining Zone (data based on the J-ROC1 well).

Figure 3-9. Major aquifer systems of the Williston Basin.

Figure 3-10. Upper stratigraphy of Oliver County showing the stratigraphic relationship of Cretaceous and Tertiary groundwater-bearing formations (modified from Croft, 1973).

Figure 3-11. Depth to surface of the Fox Hills Formation in western North Dakota (Fischer, 2013).

Figure 3-12. Potentiometric surface of the Fox Hills–Hell Creek aquifer system shown in feet of hydraulic head above sea level. Flow is to the northeast through the area of investigation in central Oliver County (modified from Fischer, 2013).

Figure 3-13. Map of water wells in the AOR in relation to the McCall-1 planned injection well, the NRDT-1 proposed monitoring well, storage facility area, AOR, and legacy oil and gas wells.

Figure 3-14. West–east cross section of the major regional aquifer layers in Mercer and Oliver Counties and their associated geologic relationships (modified from Croft, 1973). The

Microfracture in situ stress tests were performed using the MDT tool in the J-LOC1 wellbore. Microfracture stress tests were attempted in the J-ROC1 well, however, because of extremely unstable wellbore conditions, the MDT stress tool run was not performed after a near loss of the tool in the wellbore.

black dots on the inset map represent the locations of the water wells illustrated on the cross section

For the J-LOC1 well, in the Icebox Formation at 9,749.5 and 9,751.2 ft, the MDT tool was unable to cause a breakdown in the formation with an applied maximum injection pressure of 10,984.9 and 10,867.24 psi, respectively (Figures 2-33 and 2-34). The maximum injection pressure was limited by the dual-packer mechanical specifications having a set maximum differential pressure rating between the upper packer and hydrostatic pressure of 5,500 psi, see Appendix D, "Schlumberger Dual-Packer Module." The inability to break down the Icebox Formation at the two depths indicated that the formation is very tight competent and exhibits sufficient geologic integrity to contain the injected CO₂ stream.

The Icebox Formation was not suitable to collect competent core samples from the J-LOC1 well core for the purposes of porosity and permeability laboratory tests, the samples would crush in the equipment. The formation was found to be tight, and porosity and permeability estimates were derived from HPM1 testing for one sample (Table 2-11). The lithology of the cored sections of the Icebox Formation is primarily shale, with minor pyrite.

2.4.2 Additional Overlying Confining Zones

Several other formations provide additional confinement above the Icebox. Impermeable rocks above the primary seal include the Roughlock Formation and the Red River D member, which make up the first additional group of confining formations (Table 2-16). Together with the Icebox, these formations are 612 ft thick and will isolate the Deadwood/Black Island Formations fluids from migrating upward into the next permeable interval, the Red River A, B, and C members (see Figure 2-38). Above the Red River Formation, >1,000 ft of impermeable rocks act as an additional seal between the Red River and Broom Creek, the next proposed storage complex, 876 ft of impermeable rocks separate the Broom Creek from the Inyan Kara and an additional 2,545 ft of impermeable rocks separates the Inyan Kara and the lowermost USDW, the Fox Hills Formation (see Figure 2-39). Confining layers above the Inyan Kara include the Skull Creek, Newcastle, Mowry, Greenhorn, and Pierre Formations (Table 2-16).

No known transmissible faults are within these confining systems in the project area. These formations between the Deadwood, Broom Creek, and Inyan Kara and between the Inyan Kara and lowest USDW have demonstrated the ability to prevent the vertical migration of fluids throughout geologic time and are recognized as impermeable flow barriers in the Williston Basin (Downey, 1986; Downey and Dinwiddie, 1988).

Carbonates of the Red River A, B, and C members comprise the first unit with relatively high porosity and permeability above the injection zone and primary sealing formation. The Red River represents the most likely candidate to act as an overlying pressure dissipation zone. The depth to the Red River Formation in the project area is approximately 8,438 ft, and the formation itself is about 450 ft thick. In the unlikely event of out-of-zone migration through the primary and secondary sealing formations, CO₂ would become trapped in the Red River Formation. Monitoring DTS (distributed temperature sensor) data for the Red River Formation using the downhole fiber optic cable in the proposed monitor well provides an additional opportunity for mitigation and remediation (Section 4.0).

Table 2-16. Description of Zones of Confinement above the Immediate Upper Confining Zone (data based on the J-ROC1 well)

Name of Formation	Lithology	Formation Top Depth, ft	Thickness, ft	Depth below Lowest Identified USDW, ft
Pierre	Shale	1,150	1862	0
Greenhorn	Shale	3,012	391	1,862
Mowry	Shale	3,403	56	2,253
Skull Creek	Shale	3,458	235	2,308
Swift	Shale	3,864	473	2,714

Rierdon	Shale	4,337	147	3,187
Piper (Kline member)	Limestone	4,484	110	3,334
Piper (Picard)	Shale	4,594	91	3,444
Opeche	Shale/mudstone	4,685	55	3,535
Amsden	Dolostone/anhydrite	4,974	247	3,824
Kibbey Lime	Limestone	5,384	31	4,234
Charles	Limestone/anhydrite	5,526	147	4,376
Bakken	Shale	6,926	10	5,776
Birdbear	Limestone	7,075	74	5,925
Duperow	Limestone/dolostone	7,149	272	5,999
Souris River	Dolostone/limestone	7,421	175	6,271
Dawson Bay	Dolostone	7,596	729	6,446
Guntan	Dolostone/limestone	8,325	39	7,175
Stoughton	Shale/limestone	8,364	91	7,214
Lower Red River	Limestone	8,645	488	7,495
Roughlock	Shale/limestone	9,133	25	7,983

2.4.3 Lower Confining Zones

The lower confining zone of the storage complex is the Deadwood B member shale. The Deadwood B member shale consists predominantly of shale with a consistent and correlative package of higher GR, moderate resistivity, higher neutron, moderate density, and high compressional sonic across the project area. The shale within the Deadwood B member is 9,791 ft below the surface and 34 ft thick at the Tundra SGS site (Figures 2-40 and 2-41, Table 2-10).

At 144 ft below the top of the Deadwood C-sand is an 80-ft-thick shaly layer of the Deadwood B member. Data acquired from the core plug samples taken from the Deadwood B member show porosity values ranging from 1.55% to 2.63% and permeability values from 0.0083 to 0.0177 mD (Table 2-17).

3.4 Protection of USDWs

3.4.1 Introduction of USDW Protection

The primary confining zone and additional overlying confining zones geologically isolate the Fox Hills Formation, the deepest USDW in the AOR. The loebox Formation is the primary confining zone with additional confining layers above, which geologically isolates all USDWs from the injection zone (Table 3-6).

3.4.2 Geology of USDW Formations

The hydrogeology of western North Dakota comprises several shallow freshwater-bearing formations of the Quaternary, Tertiary, and upper Cretaceous-aged sediments underlain by multiple saline aquifer systems of the Williston Basin (Figure 3-9). These saline and freshwater systems are separated by the Cretaceous Pierre Shale of the Williston Basin, a regionally extensive shale between 1000 and 1500 ft thick (Thamke and others, 2014).

The freshwater aquifers comprise the Cretaceous Fox Hills and Hell Creek Formations; overlying Cannonball, Tongue River, and Sentinel Butte Formations of Tertiary Fort Union Group; and the Tertiary Golden Valley Formation (Figure 3-

10). Above these are undifferentiated alluvial and glacial drift Quaternary aquifer layers, which are not necessarily present in all parts of the AOR (Croft, 1973).

The lowest USDW in the AOR is the Fox Hills Formation, which together with the overlying Hell Creek Formation, is a confined aquifer system. The Hell Creek Formation is a poorly consolidated unit composed of interbedded sandstone, siltstone, and claystones with occasional carbonaceous beds, all fluvial origin. The underlying Fox Hills Formation is interpreted as interbedded nearshore marine deposits of sand, silt, and shale deposited as part of the final Western Interior Seaway retreat (Fischer, 2013). The Fox Hills Formation in the AOR is approximately 700 to 900 ft deep and 200 to 350 ft thick. The structure of the Fox Hills and Hell Creek Formations follows that of the Williston Basin, dipping gently inward the center of the basin to the northwest of the AOR (Figure 3-11).

The Pierre Shale is a thick, regionally extensive shale unit, which forms the lower boundary of the Fox Hills–Hell Creek system, also isolating all overlying freshwater aquifers from the deeper saline aquifer systems. The Pierre shale is a dark gray to black marine shale and is typically 1000 ft thick in the AOR (Tharke and others, 2014).

3.4.3 Hydrology of USDW Formations

The aquifers of the Fox Hills and Hell Creek Formations are hydraulically connected and function as a single confined aquifer system (Fischer, 2013). The Bacon Creek Member of the Hell Creek Formation forms a regional aquitard for the Fox Hills–Hell Creek aquifer system, which isolates it from the overlying aquifer layers. Recharge for the Fox Hills–Hell Creek aquifer system occurs in southwestern North Dakota along the Cedar Creek Anticline and discharges into overlying strata under central and eastern North Dakota (Fischer, 2013). Flow through the AOR is to the east (Figure 3-12). Water sampled from the Fox Hills Formation is a sodium bicarbonate type with a total dissolved solids (TDS) content of approximately 1,500–1,600 ppm. Previous analysis of Fox Hills Formation water has also noted high levels of fluoride, more than 5 mg/L (Trapp and Croft, 1975). As such, the Fox Hills–Hell Creek system is typically not used as a primary source of drinking water. However, it is occasionally produced for irrigation and/or livestock watering.

Based on the North Dakota State Water Commission (SWC) database, eight water wells penetrate the Fox Hills Formation in the AOR (Figure 3-13). One observation well monitored by the U.S. Geological Survey is located 1 mi east of Center, North Dakota, nearly 5 mi northwest of the McCall-1 injection site. One well is 5 mi northeast of the injection site along North Dakota Highway 25 and is used for stock. The status of the remaining six wells is under investigation. One well is about 9 mi southeast of the injection site near a legacy oil exploratory well and is permitted as an industrial well. Five wells lie to the southwest. Three wells are about 3, 11, and 12 mi from the injection site and are permitted as domestic water supply. The last two wells are located on adjacent sections 11 mi from the injection site, one is permitted for stock, and the other's purpose is unknown.

Multiple other freshwater-bearing units, primarily of Tertiary age, overlie the Fox Hills–Hell Creek aquifer system in the AOR (Figure 3-14). These formations are often used for domestic and agricultural purposes. The Cannonball and Tongue River Formations comprise the major aquifer units of the Fort Union Group, which overlies the Hell Creek Formation. The Cannonball Formation consists of interbedded sandstone, siltstone, claystone, and thin lignite beds of marine origin. The Tongue River Formation is predominantly sandstone interbedded with siltstone, claystone, lignite, and occasional carbonaceous shales. The basal sandstone member of the Tongue River is persistent and a reliable source of groundwater in the region. The thickness of this basal sand ranges from approximately 200 to 500 ft and directly underlies surficial glacial deposits in the area of investigation. Tongue River groundwaters are generally a sodium bicarbonate type with a TDS of approximately 1,000 ppm (Croft, 1973).

The Sentinel Butte Formation, a silty fine-to-medium-grained sandstone with claystone and lignite interbeds, overlies the Tongue River Formation in the extreme western portion of the AOR. The Sentinel Butte Formation is predominantly sandstone with lignite interbeds. While the Sentinel Butte Formation is another important source of groundwater in the region, primarily to the west of the AOR, the Sentinel Butte is not a source of groundwater within the AOR. TDS in the Sentinel Butte Formation range from approximately 400–1,000 ppm (Croft, 1973).

3.4.4 Protection for USDWs

The Fox Hills–Hell Creek aquifer system is the lowest USDW in the AOR. The injection zone (Deadwood Formation) and lowest USDW (Fox Hills–Hell Creek aquifer system) are isolated geologically and hydrologically by multiple impermeable rock layers consisting of shale and carbonate formations of Ordovician, Silurian, Devonian, Carboniferous, Permian, Jurassic, and Cretaceous ages (Figure 3-9). The primary seal of the injection zone is the Ordovician-aged Icebox

NDAC 43-05-01-05
§1b(2)(d)
(d) An isopach map of
the storage
reservoirs.

J. An isopach map of the storage
reservoir(s).

NDAC 43-05-
01-05 §1b(2)(d)

Formation with shales of the Ordovician-aged Roughlock and Stoughton, Mississippian-Devonian-aged Bakken, Permian-aged Opeche, Jurassic-aged Piper (Picard), Rierdon, and Swift Formations, all of which overlie the Icebox Formation. Above the Swift is the confined saltwater aquifer system of the Inyan Kara Formation, which extends across much of the Williston Basin. The Inyan Kara Formation will be monitored for temperature and pressure changes via fiber optic lines installed in the injection well, McCall-1 and the NRDT-1 monitoring well. Above the Inyan Kara Formation are the Cretaceous-aged shale formations, which are named the Skull Creek, Mowry, Belle Fourche, Greenhorn, Carlisle, Niobrara, and Pierre. The Pierre Formation is the thickest shale formation in the AOR and the primary geologic barrier between the USDWs and the injection zone. The geologic strata overlying the injection zone consist of multiple impermeable rock layers that are free of transmissive faults or fractures and provide adequate isolation of the USDWs from CO₂ injection activities in the AOR.

Figure 2-10

2.3 Storage Reservoir (Injection Zone)

Regionally, the Black Island and Deadwood Formations are laterally extensive (Figure 2-8). The Black Island comprises high-energy shallow marine sandstone (permeable storage intervals) and shale (impermeable layers). The sandy members (C-sand and E member) of the Deadwood Formation contain reworked quartz arenites of marginal marine environment (Figure 2-9). The Deadwood Formation unconformably overlies the Precambrian basement and is unconformably overlain by the sands of the Black Island Formation followed by the conformable Icebox Formation (Figure 2-3).

At J-ROC1, the Deadwood C-sand member is made up of 50 ft of sandstone and is located at a depth of 9,548 ft. Across the model area, the Deadwood C-sand member varies in thickness from 40 to 88 ft, with an average thickness of 64 ft. Based on offset well data and geologic model characteristics, the Deadwood C-sand member is 100% sandstone. The Deadwood E member and Black Island Formations are made up of 69 ft of sandstone and 19 ft of dolostone and limestone at J-ROC1 and are located at a depth of 9,263 ft. Across the project area, the Deadwood E member varies in thickness from 0 to 139 ft, with an average thickness of 81 ft. The Black Island Formation varies in thickness from 14 to 77 ft, with an average of 36 ft. Based on offset well data and geologic model characteristics, the net reservoir thickness within the project area ranges from 63 to 287 ft, with an average of 165 ft (Figure 2-10).

The well log signatures for the Black Island and Deadwood storage complex are consistent and predictable across the project area. The following are the correlation definitions used to indicate the reservoir and confining zones (Figure 2-11)

- The Icebox Formation is indicated at the transitions between a moderate GR, higher resistivity, low neutron, high density, and moderate compressional sonic for the base of the Roughlock Formation to the high GR, low resistivity, high neutron, high density, and high compressional sonic. The Icebox Formation is correlative across the project area.
- The Black Island Formation is indicated by the transition from the Icebox Formation to a relatively low GR, low neutron, high density, and low compressional sonic. The Black Island has interbedded high-GR and moderate-resistivity sections.
- The Deadwood Formation (Deadwood E member) is indicated by a transition from the base high GR signature of the Black Island Formation to a low GR signature, lower neutron, higher density, and lower compressional sonic. The Deadwood E thins from west to east across the project area.
- The Deadwood D member (base of Deadwood E member) is indicated by a transition to moderate to higher GR from top to base, higher resistivity, low neutron, high density, and low to higher compressional sonic from top to base.
- The Deadwood C member is the transition between the high GR of the Deadwood D member and moderate GR, higher resistivity, low neutron, high density, and low compressional sonic. The Deadwood C-sand member at the base of the Deadwood C member is indicated by a section of low GR (10 API), low resistivity, moderate neutron, moderate density, and moderate compressional sonic.
- The Deadwood B member (base of Deadwood C-sand member) is indicated by the transition from a low GR signature of the Deadwood C-sand member to a high GR, higher resistivity, low neutron, high density, and higher compressional sonic.
- The Deadwood B member shale unit is indicated by a higher GR, moderate resistivity, higher neutron, moderate density, and high compressional sonic. This unit is contained within the Deadwood B member and can be correlated across the project area.

Figure 2-10. Isopach map of the Black Island and Deadwood Formations in the simulation model extent.

- The Precambrian basement is indicated by a change from low to relatively high GR, low-to-moderate resistivity, and a lower compressional sonic character that can be correlated across the project area.

Seismic data collected as part of site characterization efforts (Figure 2-6) were used to reinforce structural correlation and thickness estimations of the storage reservoir. The combined structural correlation and analyses indicate that there should be few-to-no major reservoir stratigraphic discontinuities near J-LOC1 and J-ROC1 (Figures 2-12a and 2-12b). The Deadwood E member pinches out 12.5 mi to the east of the J-ROC1 site. A structure map of the Deadwood and Black Island Formations shows no detectable features (e.g., folds, domes, or fault traps) with associated spill points in the project area (Figure 2-13).

For additional information, go to section 2.3 of the Tundra SGS SFP.

Figure 2-31 and Figure 2-41

2.4 Confining Zones

The confining zones for the Deadwood and Black Island Formations are the overlying Icebox Formation and underlying Deadwood B member shale (Figure 2-3, Table 2-10). All three units, the Icebox Formation, Deadwood B member shale, and Precambrian basement, consist of impermeable rock layers.

2.4.1 Upper Confining Zone

In the Tundra SGS area, the Icebox consists of shale. This upper confining zone is laterally extensive across the project area (Figures 2-29 and 2-30) 9,308 ft below the land surface and 118 ft thick at the Tundra SGS site (Table 2-10 and Figure 2-31). The upper confining zone has sufficient areal extent and integrity to contain the injected CO₂. The upper confining zone is free of transmissive faults and fractures (Section 2.5). The contact between the underlying sandstone of the Black Island Formation is conformable and can be correlated across the project area. The transition from the Icebox to the Black Island is indicated by a relatively low GR, low neutron, high density, and low compressional sonic across the contact (Figure 2-32).

Microfracture in situ stress tests were performed using the MDT tool in the J-LOC1 wellbore. Microfracture stress tests were attempted in the J-ROC1 well, however, because of extremely unstable wellbore conditions, the MDT stress tool run was not performed after a near loss of the tool in the wellbore.

For the J-LOC1 well, in the Icebox Formation at 9,749.5 and 9,751.2 ft, the MDT tool was unable to cause a breakdown in the formation with an applied maximum injection pressure of 10,984.9 and 10,867.24 psi, respectively (Figures 2-33 and 2-34). The maximum injection pressure was limited by the dual-packer mechanical specifications having a set maximum differential pressure rating between the upper packer and hydrostatic pressure of 5,500 psi, see Appendix D, "Schlumberger Dual-Packer Module." The inability to break down the Icebox Formation at the two depths indicated that the formation is very tight competent and exhibits sufficient geologic integrity to contain the injected CO₂ stream.

The Icebox Formation was not suitable to collect competent core samples from the J-LOC1 well core for the purposes of porosity and permeability laboratory tests; the samples would crush in the equipment. The formation was found to be tight, and porosity and permeability estimates were derived from HPMT testing for one sample (Table 2-11). The lithology of the cored sections of the Icebox Formation is primarily shale, with minor pyrite.

2.4.3 Lower Confining Zones

The lower confining zone of the storage complex is the Deadwood B member shale. The Deadwood B member shale consists predominantly of shale with a consistent and correlative package of higher GR, moderate resistivity, higher neutron, moderate density, and high compressional sonic across the project area. The shale within the Deadwood B member is 9,791 ft below the surface and 34 ft thick at the Tundra SGS site (Figures 2-40 and 2-41, Table 2-10).

At 144 ft below the top of the Deadwood C-sand is an 80-ft-thick shaly layer of the Deadwood B member. Data acquired from the core plug samples taken from the Deadwood B member show porosity values ranging from 1.55% to 2.63% and permeability values from 0.0083 to 0.0177 mD (Table 2-17).

Figure 2-31 Isopach map of the upper confining zone across the simulation model extent

Figure 2-41 Isopach map of the Deadwood B member shale across the Tundra SGS area

NDAC 43-05-01-05 §1b(2)(e)

(e) An isopach map of the primary and any secondary containment barrier for the storage reservoir.

k. An isopach map of the primary containment barrier for the storage reservoir;

NDAC 43-05-01-05 §1b(2)(e)

	<p>l An isopach map of the secondary confinement barrier for the storage reservoir;</p>	<p>Figure 2-38 and Figure 2-39</p> <p>2.4.2 Additional Overlying Confining Zones Several other formations provide additional confinement above the Icebox. Impermeable rocks above the primary seal include the Roughlock Formation and the Red River D member, which make up the first additional group of confining formations (Table 2-16). Together with the Icebox, these formations are 612 ft thick and will isolate the Deadwood/Black Island Formations fluids from migrating upward into the next permeable interval, the Red River A, B, and C members (see Figure 2-38). Above the Red River Formation, >1,000 ft of impermeable rocks act as an additional seal between the Red River and Broom Creek, the next proposed storage complex, 876 ft of impermeable rocks separate the Broom Creek from the Inyan Kara and an additional 2,545 ft of impermeable rocks separates the Inyan Kara and the lowermost USDW, the Fox Hills Formation (see Figure 2-39). Confining layers above the Inyan Kara include the Skull Creek, Newcastle, Mowry, Greenhorn, and Pierre Formations (Table 2-10).</p> <p>No known transmissible faults are within these confining systems in the project area. These formations between the Deadwood, Broom Creek, and Inyan Kara and between the Inyan Kara and lowest USDW have demonstrated the ability to prevent the vertical migration of fluids throughout geologic time and are recognized as impermeable flow barriers in the Williston Basin (Downey, 1986; Downey and Dinwiddie, 1988).</p> <p>Carbonates of the Red River A, B, and C members comprise the first unit with relatively high porosity and permeability above the injection zone and primary sealing formation. The Red River represents the most likely candidate to act as an overlying pressure dissipation zone. The depth to the Red River Formation in the project area is approximately 8,438 ft, and the formation itself is about 450 ft thick. In the unlikely event of out-of-zone migration through the primary and secondary sealing formations, CO₂ would become trapped in the Red River Formation. Monitoring DTS (distributed temperature sensor) data for the Red River Formation using the downhole fiber optic cable in the proposed monitor well provides an additional opportunity for mitigation and remediation (Section 4.0).</p>	<p>Figure 2-38. Isopach map of the interval between the top of the Black Island Formation and the top of the Swift Formation. This interval represents the primary and secondary confinement zones.</p> <p>Figure 2-39. Isopach map of the interval between the top of the Inyan Kara Formation and the top of the Pierre Formation. This interval represents the tertiary confinement zone.</p>
<p>NDAC 43-05-01-05 §1b(2)(f)</p> <p>(f) A structure map of the top and base of the storage reservoirs;</p>	<p>m A structure map of the top of the storage formation,</p>	<p>Figure 2-13 and Figure 2-30</p> <p>2.5 Storage Reservoir (Injection Zone) Regionally, the Black Island and Deadwood Formations are laterally extensive (Figure 2-8). The Black Island comprises high-energy shallow marine sandstone (permeable storage intervals) and shale (impermeable layers). The sandy members (C-sand and E member) of the Deadwood Formation comprise reworked quartz arenites of marginal marine environment (Figure 2-9). The Deadwood Formation unconformably overlies the Precambrian basement and is unconformably overlain by the sands of the Black Island Formation followed by the conformable Icebox Formation (Figure 2-1).</p> <p>At J-ROC1, the Deadwood C-sand member is made up of 50 ft of sandstone and is located at a depth of 9,548 ft. Across the model area, the Deadwood C-sand member varies in thickness from 40 to 88 ft, with an average thickness of 64 ft. Based on offset well data and geologic model characteristics, the Deadwood C-sand member is 100% sandstone. The Deadwood E member and Black Island Formations are made up of 69 ft of sandstone and 19 ft of dolostone and limestone at J-ROC1 and are located at a depth of 9,283 ft. Across the project area, the Deadwood E member varies in thickness from 0 to 139 ft, with an average thickness of 81 ft. The Black Island Formation varies in thickness from 14 to 77 ft, with an average of 36 ft. Based on offset well data and geologic model characteristics, the net reservoir thickness within the project area ranges from 63 to 287 ft, with an average of 165 ft (Figure 2-10).</p> <p>The well log signatures for the Black Island and Deadwood storage complex are consistent and predictable across the project area. The following are the correlation definitions used to indicate the reservoir and confining zones (Figure 2-11):</p> <ul style="list-style-type: none"> • The Icebox Formation is indicated at the transitions between a moderate GR, higher resistivity, low neutron, high density, and moderate compressional sonic for the base of the Roughlock Formation to the high GR, low resistivity, high neutron, high density, and high compressional sonic. The Icebox Formation is correlative across the project area. • The Black Island Formation is indicated by the transition from the Icebox Formation to a relatively low GR, low neutron, high density, and low compressional sonic. The Black Island has interbedded high-GR and moderate-resistivity sections. 	<p>Figure 2-13. Structure map of the Black Island and Deadwood Formations across the simulation model extent.</p> <p>Figure 2-30. Structure map of the upper confining zone across the simulation model extent.</p>

- The Deadwood Formation (Deadwood E member) is indicated by a transition from the base high GR signature of the Black Island Formation to a low GR signature, lower neutron, higher density, and lower compressional sonic. The Deadwood E thins from west to east across the project area.
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Seismic data collected as part of site characterization efforts (Figure 2-6) were used to reinforce structural correlation and thickness estimations of the storage reservoir. The combined structural correlation and analyses indicate that there should be few-to-no major reservoir stratigraphic discontinuities near J-LOC1 and J-ROC1 (Figures 2-12a and 2-12b). The Deadwood E member pinches out 12.5 mi to the east of the J-ROC1 site. A structure map of the Deadwood and Black Island Formations shows no detectable features (e.g., folds, domes, or fault traps) with associated spill points in the project area (Figure 2-13).

For additional information, go to section 2.3 of the Tundra SGS SFP.

2.4.1 Upper Confining Zone

In the Tundra SGS area, the Icebox consists of shale. This upper confining zone is laterally extensive across the project area (Figures 2-29 and 2-30) 9,308 ft below the land surface and 118 ft thick at the Tundra SGS site (Table 2-10 and Figure 2-31). The upper confining zone has sufficient areal extent and integrity to contain the injected CO₂. The upper confining zone is free of transmissive faults and fractures (Section 2.5). The contact between the underlying sandstone of the Black Island Formation is conformable and can be correlated across the project area. The transition from the Icebox to the Black Island is indicated by a relatively low GR, low neutron, high density, and low compressional sonic across the contact (Figure 2-32).

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The Icebox Formation was not suitable to collect competent core samples from the J-LOC1 well core for the purposes of porosity and permeability laboratory tests, the samples would crush in the equipment. The formation was found to be tight, and porosity and permeability estimates were derived from HPMI testing for one sample (Table 2-11). The lithology of the cored sections of the Icebox Formation is primarily shale, with minor pyrite.

n. A structure map of the base of the storage formation,

Figure 2-13 and Figure 2-40

2.3 Storage Reservoir (Injection Zone)

Regionally, the Black Island and Deadwood Formations are laterally extensive (Figure 2-8). The Black Island comprises high-energy shallow marine sandstone (porable storage intervals) and shale (impermeable layers). The sandy members (C-sand and E member) of the Deadwood Formation comprise reworked quartz arenites of marginal marine environment (Figure 2-9). The Deadwood Formation unconformably overlies the Precambrian basement and is unconformably overlain by the sands of the Black Island Formation followed by the conformable Icebox Formation (Figure 2-3).

At J-ROC1, the Deadwood C-sand member is made up of 50 ft of sandstone and is located at a depth of 9,548 ft. Across the model area, the Deadwood C-sand member varies in thickness from 40 to 88 ft, with an average thickness of 64 ft. Based on offset well data and geologic model characteristics, the Deadwood C-sand member is 100% sandstone. The Deadwood E member and Black Island Formations are made up of 69 ft of sandstone and 19 ft of dolostone and limestone at J-ROC1 and are located at a depth of 9,283 ft. Across the project area, the Deadwood E member varies in thickness from 0 to 139 ft, with an average thickness of 81 ft. The Black Island Formation varies in thickness from 14 to 77 ft, with an average of 36 ft. Based on offset well data and geologic model characteristics, the net reservoir thickness within the project area ranges from 63 to 287 ft, with an average of 165 ft (Figure 2-10).

The well log signatures for the Black Island and Deadwood storage complex are consistent and predictable across the project area. The following are the correlation definitions used to indicate the reservoir and confining zones (Figure 2-11):

- The Icebox Formation is indicated at the transitions between a moderate GR, higher resistivity, low neutron, high density, and moderate compressional sonic for the base of the Roughlock Formation to the high GR, low resistivity, high neutron, high density, and high compressional sonic. The Icebox Formation is correlative across the project area.
- The Black Island Formation is indicated by the transition from the Icebox Formation to a relatively low GR, low neutron, high density, and low compressional sonic. The Black Island has interbedded high-GR and moderate-resistivity sections.
- The Deadwood Formation (Deadwood E member) is indicated by a transition from the base high GR signature of the Black Island Formation to a low GR signature, lower neutron, higher density, and lower compressional sonic. The Deadwood E thins from west to east across the project area.
- The Deadwood D member (base of Deadwood E member) is indicated by a transition to moderate to higher GR from top to base, higher resistivity, low neutron, high density, and low to higher compressional sonic from top to base.
- The Deadwood C member is the transition between the high GR of the Deadwood D member and moderate GR, higher resistivity, low neutron, high density, and low compressional sonic. The Deadwood C-sand member at the base of the Deadwood C member is indicated by a section of low GR (10 API), low resistivity, moderate neutron, moderate density, and moderate compressional sonic.
- The Deadwood B member (base of Deadwood C-sand member) is indicated by the transition from a low GR signature of the Deadwood C-sand member to a high GR, higher resistivity, low neutron, high density, and higher compressional sonic.
- The Deadwood B member shale unit is indicated by a higher GR, moderate resistivity, higher neutron, moderate density, and high compressional sonic. This unit is contained within the Deadwood B member and can be correlated across the project area.
- The Precambrian basement is indicated by a change from low to relatively high GR, low-to-moderate resistivity, and a lower compressional sonic character that can be correlated across the project area.

Seismic data collected as part of site characterization efforts (Figure 2-6) were used to reinforce structural correlation and thickness estimations of the storage reservoir. The combined structural correlation and analyses indicate that there should be few-to-no major reservoir stratigraphic discontinuities near J-LOC1 and J-ROC1 (Figures 2-12a and 2-12b). The Deadwood E member pinches out 12.3 mi to the east of the J-ROC1 site. A structure map of the Deadwood and Black Island Formations shows no detectable features (e.g., folds, domes, or fault traps) with associated spill points in the project area (Figure 2-13).

For additional information, go to section 2.3 of the Tundra SGS SPP.

Figure 2-13. Structure map of the Black Island and Deadwood Formations across the simulation model extent

Figure 2-40. Structure map of the Deadwood B member shale across the greater Tundra SGS area

NDAC 43-05-01-05

§1b(2)(i)

(i) Structural and stratigraphic cross sections that describe the geologic conditions at the storage reservoir.

o Structural cross sections that describe the geologic conditions at the storage reservoir.

NDAC 43-05-01-05 §1b(2)(i)

2.4.3 Lower Confining Zones

The lower confining zone of the storage complex is the Deadwood B member shale. The Deadwood B member shale consists predominantly of shale with a consistent and correlative package of higher GR, moderate resistivity, higher neutron, moderate density, and high compressional sonic across the project area. The shale within the Deadwood B member is 9,791 ft below the surface and 34 ft thick at the Tundra SGS site (Figures 2-40 and 2-41, Table 2-10).

At 144 ft below the top of the Deadwood C-sand is an 80-ft-thick shaly layer of the Deadwood B member. Data acquired from the core plug samples taken from the Deadwood B member show porosity values ranging from 1.55% to 2.63% and permeability values from 0.0083 to 0.0177 mD (Table 2-17).

Figures 2-12a and 2-12b; and 2-14

2.3 Storage Reservoir (Injection Zone)

Regionally, the Black Island and Deadwood Formations are laterally extensive (Figure 2-8). The Black Island comprises high-energy shallow marine sandstone (permeable storage intervals) and shale (impermeable layers). The sandy members (C-sand and E member) of the Deadwood Formation comprise reworked quartz arenites of marginal marine environment (Figure 2-9). The Deadwood Formation unconformably overlies the Precambrian basement and is unconformably overlain by the sands of the Black Island Formation followed by the conformable Icebox Formation (Figure 2-3).

At J-ROC1, the Deadwood C-sand member is made up of 50 ft of sandstone and is located at a depth of 9,548 ft. Across the modal area, the Deadwood C-sand member varies in thickness from 40 to 88 ft, with an average thickness of 64 ft. Based on offset well data and geologic model characteristics, the Deadwood C-sand member is 100% sandstone. The Deadwood E member and Black Island Formations are made up of 69 ft of sandstone and 19 ft of dolostone and limestone at J-ROC1 and are located at a depth of 9,283 ft. Across the project area, the Deadwood E member varies in thickness from 0 to 139 ft, with an average thickness of 81 ft. The Black Island Formation varies in thickness from 14 to 77 ft, with an average of 36 ft. Based on offset well data and geologic model characteristics, the net reservoir thickness within the project area ranges from 63 to 287 ft, with an average of 165 ft (Figure 2-10).

The well log signatures for the Black Island and Deadwood storage complex are consistent and predictable across the project area. The following are the correlation definitions used to indicate the reservoir and confining zones (Figure 2-11)

- The Icebox Formation is indicated at the transitions between a moderate GR, higher resistivity, low neutron, high density, and moderate compressional sonic for the base of the Roughlock Formation to the high GR, low resistivity, high neutron, high density, and high compressional sonic. The Icebox Formation is correlative across the project area.
- The Black Island Formation is indicated by the transition from the Icebox Formation to a relatively low GR, low neutron, high density, and low compressional sonic. The Black Island has interbedded high-GR and moderate-resistivity sections.
- The Deadwood Formation (Deadwood E member) is indicated by a transition from the base high GR signature of the Black Island Formation to a low GR signature, lower neutron, higher density, and lower compressional sonic. The Deadwood E thins from west to east across the project area.
- The Deadwood D member (base of Deadwood E member) is indicated by a transition to moderate to higher GR from top to base, higher resistivity, low neutron, high density, and low to higher compressional sonic from top to base.
- The Deadwood C member is the transition between the high GR of the Deadwood D member and moderate GR, higher resistivity, low neutron, high density, and low compressional sonic. The Deadwood C-sand member at the base of the Deadwood C member is indicated by a section of low GR (16 API), low resistivity, moderate neutron, moderate density, and moderate compressional sonic.
- The Deadwood B member (base of Deadwood C-sand member) is indicated by the transition from a low GR signature of the Deadwood C-sand member to a high GR, higher resistivity, low neutron, high density, and higher compressional sonic.
- The Deadwood B member shale unit is indicated by a higher GR, moderate resistivity, higher neutron, moderate density, and high compressional sonic. This unit is contained within the Deadwood B member and can be correlated across the project area.

Figure 2-12a Regional well log stratigraphic cross sections of the Roughlock, Icebox, Black Island, and Deadwood Formations and the Precambrian basement flattened on the top of the Precambrian basement. Logs displayed in tracks from left to right are 1) GR (green) and caliper (red), 2) delta time (blue), and 3) interpreted lithology log.

Figure 2-12b Regional well log cross sections showing the structure of the Roughlock, Icebox, Black Island, and Deadwood Formations and the Precambrian basement. Logs displayed in tracks from left to right are 1) GR (green) and caliper (red) and 2) delta time (blue).

Figure 2-14 Cross section of the Tundra SGS CO₂ storage complex from the geologic model showing lithofacies distribution in the Deadwood Formation. Depths are referenced to mean sea level.

- The Precambrian basement is indicated by a change from low to relatively high GR, low to moderate resistivity, and a lower compressional sonic character that can be correlated across the project area.

Seismic data collected as part of site characterization efforts (Figure 2-6) were used to reinforce structural correlation and thickness estimations of the storage reservoir. The combined structural correlation and analyses indicate that there should be few-to-no major reservoir stratigraphic discontinuities near J-LOC1 and J-ROC1 (Figures 2-12a and 2-12b). The Deadwood-E member pinches out (2.5 m) to the east of the J-ROC1 site. A structure map of the Deadwood and Black Island Formations shows no detectable features (e.g., folds, domes, or fault traps) with associated spill points in the project area (Figure 2-13).

For additional information, go to section 2.3 of the Tundra SGS SFP.

p. Stratigraphic cross sections that describe the geologic conditions at the storage reservoir.

Figures 2-12a and 2-12b; and 2-14

2.3 Storage Reservoir (Injection Zone)

Regionally, the Black Island and Deadwood Formations are laterally extensive (Figure 2-8). The Black Island comprises high-energy shallow marine sandstone (permeable storage intervals) and shale (impermeable layers). The sandy members (C-sand and E member) of the Deadwood Formation comprise reworked quartz arenites of marginal marine environment (Figure 2-9). The Deadwood Formation unconformably overlies the Precambrian basement and is unconformably overlain by the sands of the Black Island Formation followed by the conformable Icebox Formation (Figure 2-3).

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- The Deadwood D member (base of Deadwood E member) is indicated by a transition to moderate to higher GR from top to base, higher resistivity, low neutron, high density, and low to higher compressional sonic from top to base.
- The Deadwood C member is the transition between the high GR of the Deadwood D member and moderate GR, higher resistivity, low neutron, high density, and low compressional sonic. The Deadwood C-sand member at the base of the Deadwood C member is indicated by a section of low GR (10 API), low resistivity, moderate neutron, moderate density, and moderate compressional sonic.
- The Deadwood B member (base of Deadwood C-sand member) is indicated by the transition from a low GR signature of the Deadwood C-sand member to a high GR, higher resistivity, low neutron, high density, and higher compressional sonic.

Figure 2-12a Regional well log stratigraphic cross sections of the Roughlock, Icebox, Black Island, and Deadwood Formations and the Precambrian basement flattened on the top of the Precambrian basement. Logs displayed in tracks from left to right are 1) GR (green) and caliper (red), 2) delta time (blue), and 3) interpreted lithology log.

Figure 2-12b Regional well log cross sections showing the structure of the Roughlock, Icebox, Black Island, and Deadwood Formations and the Precambrian basement. Logs displayed in tracks from left to right are 1) GR (green) and caliper (red) and 2) delta time (blue).

Figure 2-14 Cross section of the Tundra SGS CO₂ storage complex from the geologic model showing lithofacies distribution in the Deadwood Formation. Depths are referenced to mean sea level.

NDAC 43-05-01-05 §1b(2)(h)
(h) Evaluation of the pressure front and the potential impact on underground sources of drinking water, if any.

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NDAC 43-05-01-05 §1b(2)(h)

- The Deadwood B member shale unit is indicated by a higher GR, moderate resistivity, higher neutron, moderate density, and high compressional sonic. This unit is contained within the Deadwood B member and can be correlated across the project area.
- The Precambrian basement is indicated by a change from low to relatively high GR, low-to-moderate resistivity, and a lower compressional sonic character that can be correlated across the project area.

Seismic data collected as part of site characterization efforts (Figure 2-6) were used to reinforce structural correlation and thickness estimations of the storage reservoir. The combined structural correlation and analyses indicate that there should be few-to-no major reservoir stratigraphic discontinuities near J-LOC1 and J-ROC1 (Figures 2-12a and 2-12b). The Deadwood B member pinches out 12.5 mi to the east of the J-ROC1 site. A structure map of the Deadwood and Black Island Formations shows no detectable features (e.g., folds, domes, or fault traps) with associated spill points in the project area (Figure 2-13).

For additional information, go to section 2.3 of the Tundra SGS SFP.

3.1 Area of Review Delineation

3.1.1 Written Description

North Dakota carbon dioxide (CO₂) storage regulations require that each storage facility permit delineate an area of review (AOR), which is defined as "the region surrounding the geologic storage project where underground sources of drinking water (USDWs) may be endangered by the injection activity" (North Dakota Administrative Code [NDAC] § 43-05-01-01[4]). Concern regarding the endangerment of USDWs is related to the potential vertical migration of CO₂ and/or brine from the injection zone to the USDW. Therefore, the AOR encompasses the region overlying the injected free-phase CO₂ and the region overlying the extent of formation fluid pressure (Figure 3-1) increase sufficient to drive formation fluids (e.g., brine) into USDWs, assuming pathways for this migration (e.g., abandoned wells or fractures) are present. The minimum fluid pressure increase in the reservoir that results in a sustained flow of brine upward into an overlying drinking water aquifer is referred to as the "critical threshold pressure increase" and resultant pressure as the "critical threshold pressure." Application of the U.S. Environmental Protection Agency (EPA) method shows the critical threshold pressure increase at the top of the Deadwood Formation using site-specific data from J-ROC1 was determined to be 127 psi (Appendix A, Table A-4).

Appendix A includes a detailed discussion on the computational modeling and simulations (e.g., CO₂ plume extent, pressure front, AOR boundary, etc.), assumptions, and justification used to delineate the AOR and method for delineation of the AOR.

NDAC § 43-05-01-05 subsection 1(b)(3) requires, "A review of the data of public record, conducted by a geologist or engineer, for all wells within the facility area, which penetrate the storage reservoir or primary or secondary seals overlying the reservoir, and all wells within the facility area and within one mile [1.61 kilometers], or any other distance as deemed necessary by the commission, of the facility area boundary." Based on the computational methods used to simulate CO₂ injection activities and associated pressure front (Figure 3-1), the resulting AOR for Tundra SGS is delineated as being 1 mi beyond the storage facility area boundary. This extent ensures compliance with existing state regulations.

All wells located in the AOR that penetrate the storage reservoir and its primary overlying seal were evaluated (Figures 3-2 through 3-5) by a professional engineer pursuant to NDAC § 43-05-01-05 subsection 1(b)(3). The evaluation was performed to determine if corrective action is required and included a review of all available well records (Table 3-1). The evaluation determined that all abandoned wells within the AOR have sufficient isolation to prevent formation fluids or injected CO₂ from vertically migrating outside of the storage reservoir or into USDWs and that no corrective action is necessary (Tables 3-2 through 3-5 and Figures 3-6 through 3-8).

An extensive geologic and hydrogeologic characterization performed by a team of geologists from the Energy & Environmental Research Center (EERC) resulted in no evidence of transmissive faults or fractures in the upper confining zone within the AOR and revealed that the upper confining zone has sufficient geologic integrity to prevent vertical fluid movement. All geologic data and investigations indicate the storage reservoir within the AOR has sufficient containment and geologic integrity, including geologic confinement above and below the injection zone, to prevent vertical fluid movement.

Table A-5 EPA Method 1 Critical Threshold Pressure Increase Calculated at the J-ROC1 Wellbore Location

Figure A-20 Final AOR estimations of the Tundra SGS storage facility area in relation to nearby legacy wells. Shown is the storage facility area (purple boundary and shaded area), area of review (gray boundary and shaded area), and Center city limits (dotted yellow boundary). Orange circles represent legacy wells near the storage facility area.

Figure A-21 Land use in and around the AOR of the Tundra SGS storage facility.

This section of the storage facility permit application is accompanied by maps and tables that include information required and in accordance with NDAC §§ 43-05-01-05 subsections 1(a) and 1(b) and 43-05-01-05 1 subsection 2, such as the storage facility area, location of any proposed injection wells or monitoring wells, presence of significant surface structures or land disturbances, and location of water wells and any other wells within the AOR. Table 3-1 lists all the surface and subsurface features that were investigated as part of the AOR evaluation, pursuant to NDAC §§ 43-05-01-05 subsections 1(a) and 1(b)(3) and 43-05-01-05 1 subsection 2. Surface features that were investigated but not found within the AOR boundary were identified in Table 3-1.

Appendix A – DATA, PROCESSING, AND OUTCOMES OF CO₂ STORAGE GEOMODELING AND SIMULATIONS

Delineation of AOR

The AOR is defined as the region surrounding the geologic storage project where USDWs may be endangered by CO₂ injection activity (North Dakota Administrative Code [NDAC] § 43-05-01-05). The primary endangerment risk is due to the potential for vertical migration of CO₂ and/or formation fluids to a USDW from the storage reservoir. Therefore, the AOR encompasses the region overlying the extent of reservoir fluid pressure increase sufficient to drive formation fluids (e.g., brine) into a USDW, assuming pathways for this migration (e.g., abandoned wells or fractures) are present. The minimum pressure increase in the reservoir that results in a sustained flow of brine upward into an overlying drinking water aquifer is referred to as the "critical threshold pressure increase" and the resultant pressure as the "critical threshold pressure." The U.S. Environmental Protection Agency (EPA) guidance for AOR delineation under the Underground Injection Control (UIC) Program for Class VI wells provides several methods for estimating the critical threshold pressure increase and the resulting critical threshold pressure.

EPA (2013) Method 1 (pressure front based on bringing injection zone and USDW to equivalent hydraulic heads) is presented as a method for determining whether a storage reservoir is in hydrostatic equilibrium with the lowest USDW (Thornhill and others, 1982). Under Method 1, the increase in pressure (ΔP) that may be sustained in the injection zone (critical pressure threshold) is given by

$$\Delta P_{i,f} = P_u + \rho_i g \cdot (z_u - z_i) - P_i \quad [\text{Eq. 1}]$$

where P_u is the initial fluid pressure in the USDW, ρ_i is the storage reservoir fluid density (mg/m^3), g is the acceleration due to gravity (m/s^2), z_u is the representative elevation of the USDW (m amsl), z_i is the representative elevation of the injection zone (m amsl), P_i is the initial pressure in the injection zone (Pa), and $\Delta P_{i,f}$ is the critical pressure threshold.

Equation 1 assumes that the hypothetical open borehole is perforated exclusively within the injection zone and USDW. If $\Delta P_{i,f} = 0$, then the reservoir and USDW are in hydrostatic equilibrium; if $\Delta P_{i,f} > 0$, then the reservoir is underpressurized relative to the USDW, and if $\Delta P_{i,f} < 0$, then the reservoir is overpressurized relative to the USDW. In the case of $\Delta P_{i,f} > 0$, the value of $\Delta P_{i,f}$ represents the amount of pressure increase that can be accommodated in the storage reservoir before brine would flow into the lowest USDW.

Critical Threshold Pressure Increase Estimation at J-ROC1 For the purposes of delineating the $\Delta P_{i,f}$ for the Tundra SGS study area, constant fluid densities for the lowermost USDW (the Fox Hills Formation) and the injection zone (the Deadwood Formation) were used. A density of $1,001 \text{ kg}/\text{m}^3$ was used to represent the USDW fluids, and a density of $1,177 \text{ kg}/\text{m}^3$, which is estimated based on the in situ brine salinity, temperature, and pressure, was used to represent injection zone fluids.

Critical pressure threshold increases were calculated for the proposed storage reservoir at a range of depths across the reservoir using Equation 1, formation depths and thicknesses from J-ROC1, and fluid density values from the nearby J-LOC1 stratigraphic test well (Table A-5). Using this method, the critical threshold pressure increase ($\Delta P_{i,f}$) at the top of the Deadwood Formation at the J-ROC1 well was determined to be 127 psi. Because $\Delta P_{i,f} > 0$, the value of $\Delta P_{i,f}$ represents the amount of pressure increase that can be accommodated in the storage reservoir before brine would flow into the lowest USDW.

Calculations of critical threshold pressure increase were compared to potential pressure increases within the storage facility area that would result from CO₂ injection and the potential lateral extent of the injection fluid as determined by predictive simulations. Table A-5 provides estimates of $\Delta P_{i,f}$ for various depths within the Deadwood Formation at J-

ROC1. The same calculations were applied to the geologic model to determine $\Delta P_{i,f}$ for each cell, values from which were then compared against the difference in pressure predicted for each cell in the simulation model at the end of injection (time of greatest increase in pressure since the beginning of simulated injection). A defined area of the simulation model around the injection well displays a 20-year pressure increase (ΔP) that is greater than the calculated $\Delta P_{i,f}$ for the cells in that area. The boundary between where $\Delta P_{i,f} > \Delta P$ and where $\Delta P_{i,f} < \Delta P$ delineates the line of critical threshold pressure increase and must be accounted for—in conjunction with the CO₂ areal extent—when determining AOR.

The storage reservoir is the maximum extent of the injected CO₂ or the maximum extent of the critical pressure, whichever is greater. At Tundra SGS, the line of critical threshold pressure increase plus 1 mile is the AOR, because the maximum extent of critical pressure is larger than the maximum extent of the injected CO₂. As shown in Figure A-20, the AOR is depicted by the gray shaded area, which includes the storage facility area (purple shaded area). Figure A-21 illustrates the land use within the AOR.

2.4.4 Geomechanical Information of Confining Zone

2.4.4.1 Fracture Analysis

Fractures within the Icebox Formation, the overlying confining zone, and Deadwood B Formation, the underlying confining zone, have been assessed during the description of the J-LOC1 well core. Observable fractures were categorized by attributes, including morphology, orientation, aperture, and origin. Secondly, natural, in situ fractures were assessed through the interpretation of Schlumberger's Quanta Geo log acquired during the drilling of the J-LOC1 well.

2.4.4.2 Fracture Analysis Core Description

Features within the Icebox Formation are primarily related to the compaction. There is no presence of natural fractures. Only the stylolites which are compaction-related exist, they vary in orientation and exhibit mainly horizontal and rare oblique trends.

In the Deadwood B Formation, rare closed-tension fractures were observed in the core interval and are commonly coincident with the observed horizontal compaction features (stylolite). Quartz is the dominant mineral found to fill observable fractures. The stylolites are well-represented, vary in orientation, and exhibit mainly a horizontal trend.

2.4.4.3 Borehole Image Fracture Analysis (FMI)

Schlumberger's Quanta Geo log was chosen to evaluate the geomechanical condition of the formation in the subsurface. This log provides a 360-degree image of the formation of interest and can be oriented to provide an understanding of the general direction of features observed.

Figures 2-46 and 2-47 show two sections of the interpreted borehole imagery and primary features observed. The far-right track on Figure 2-46 demonstrates that the tool provides information on surface boundaries and bedding features and notes the presence of electrically conductive features that characterize the Icebox Formation. These are interpreted as stylolites. Figure 2-47 reveals the features that are clay-filled because of their electrically conductive signal. The logged interval of the Deadwood B shows that the main features present are stylolites, which are an indication that the formation has undergone a reduction in porosity in response to postdepositional stress.

The diagrams shown in Figures 2-48 and 2-49 provide the orientation of the electrically conductive features in the Icebox and Deadwood B Formations, respectively. As shown, the electrically conductive features are stylolites and have no preferred orientation.

Drilling-induced fractures were not identified either in the Icebox or Deadwood B Formations. However, breakouts were highlighted in the Precambrian basement and are oriented northwest-southeast (Figure 2-50), which is perpendicular to the maximum horizontal stress (SHmax).

2.4.4.4 Stress

During drilling of the J-LOC1 well, an openhole MDT microfracture in situ stress test was completed to determine a formation breakdown pressure and minimum horizontal stress. The microfracture in situ stress test operation was performed using the MDT dual-packer module to obtain the formation breakdown pressure followed by multiple injection-falloff cycles to determine formation geomechanics properties. Within the Icebox Formation confining zone, two attempts were made at a depth of 9,749.51 and 9,751.19 ft to determine the formation breakdown pressure and closure pressure, which corresponds to the minimum horizontal stress. Unfortunately, these attempts were unsuccessful to achieve the

NDAC 43-05-01-05 §1b(2)(i)

(i) Geomechanical information on fractures, stress, ductility, rock strength, and in situ fluid pressures within the confining zone. The confining zone must be free of transmissive faults or fractures and of sufficient areal extent and integrity to contain the injected carbon dioxide stream,

r. Geomechanical information on the confining zone. The confining zone must be free of transmissive faults or fractures and of sufficient areal extent and integrity to contain the injected carbon dioxide.

- Fractures
- Stress
- Ductility
- Rock strength
- In situ fluid pressure

NDAC 43-05-01-05 §1b(2)(i)

Figure 2-46: Examples of the interpreted Quanta Geo log for the J-LOC1 well. This example shows the common feature types seen in the Icebox Quanta Geo borehole image analysis.

Figure 2-47: Examples of the interpreted Quanta Geo log for the J-LOC1 well. This example shows the common feature types seen in the Deadwood B Quanta Geo borehole image analysis.

Figure 2-48: This example shows stylolites seen in the Icebox Formation.

Figure 2-49: This example shows stylolites seen in the Deadwood B Formation.

Figure 2-50: Breakout dip orientation in the Precambrian basement.

Figure 2-51: J-LOC1 Icebox MDT microfracture in situ stress test (first attempt) at 9,749.51 ft.

Figure 2-52: J-LOC1 Icebox MDT microfracture in situ stress test (second attempt) at 9,751.19 ft.

Table 2-21: Summary of Stresses in Icebox Formation.

Figure 2-53: 1D MEM of the Icebox Formation.

Figure 2-54: Results of multistage triaxial test performed at confining pressures exceeding 40 MPa (5,800 psi), providing information regarding the elastic parameters and peak strength of the rock sample. Failure occurred at the fourth-stage peak stress of 121.8 MPa.

Table 2-22: Sample Parameters.

NDAC 43-05-01-05 §1b(2)(o)

NDAC 43-05-01-05 §1b(2)(o) Identify and characterize additional strata overlying the storage reservoir that will prevent vertical fluid movement, are free of transmissive faults or fractures, allow for pressure dissipation, and

s Identify and characterize additional strata overlying the storage reservoir that will prevent vertical fluid movement
 Free of transmissive faults
 Free of transmissive fractures
 Effect on pressure dissipation
 Utility for monitoring, mitigation, and remediation

formation breakdown pressure with an applied maximum injection pressure of 10984.9 and 10867.24 psi (Figure 2-51 and Figure 2-52). The maximum injection pressure was limited by the dual-packer mechanical specifications having a set maximum differential pressure rating between the upper packer and hydrostatic pressure of 5,500 psi, see Appendix D, "Schlumberger Dual-Packer Module."

J-LOC1 openhole logging data were used to construct a 1D mechanical earth model (MEM) for different formations, including the Icebox Formation. The data available were loaded and quality-checked using Techlog software, where the overburden stress and pore pressure were estimated and calibrated with available MDT data. The elastic properties such as Young's modulus, Poisson's ratio, Shear modulus, and Bulk modulus were calculated based on the available well logs. The formation strength properties like uniaxial compressive strength (UCS), tensile strength, friction angle, and cohesion were also estimated from the available data (Figure 2-53). Table 2-21 provides the summary of stresses in the Icebox Formation generated using the 1D MEM.

2.4.4.5 Ductility and Rock Strength

Ductility and rock strength have been determined through laboratory testing of rock samples acquired from the Icebox and Deadwood B Formation cores in the J-LOC1. Icebox Formation samples were not testable. Plugs failed under minor stress because of the fissility of the rock. On the other hand, one sample from the Deadwood B Formation was tested and characterized by a porosity equal to 1.4% and a permeability of 0.001 mD. To determine these parameters, a multistage triaxial test was performed at confining pressures exceeding 40 MPa (5801.51 psi). This commonly used test provides information regarding the elastic parameters and peak strength of a material (Figure 2-54). Table 2-22 shows the sample parameters, while Tables 2-23 and 2-24 show the elastic, dynamic, and velocity parameters obtained at different confining pressures.

Appendix A - DATA, PROCESSING, AND OUTCOMES OF CO₂ STORAGE GEOMODELING AND SIMULATIONS

Table A-2. MDT Pressure Measurements Recorded from the J-LOC1 Well and Derived Formation Pressure Gradients

Test Depth, ft MD*	Formation Pressure, psi	Formation Pressure Gradient, psi/ft
9,800	4,507	0.46
9,885	4,548	0.46
9,885	4,548	0.46
10,087	4,651	0.46
10,254	4,734	0.46

Table A-3. Summary of Reservoir Properties in the Simulation Model

Average Permeability, mD	Average Porosity, %	Initial Pressure, P _i , psi	Salinity, ppm	Boundary Condition
Icebox: 7.25×10^{-7}	Icebox: -0.12			Open
Black Island: 9.81	Black Island: -5.48	-4,548.42	256,000	(infinite-acting)
Deadwood: 31.65	Deadwood: -3.81			
Precambrian: 7.88×10^{-7}	Precambrian: -0.74			

2.4.2 Additional Overlying Confining Zones

Several other formations provide additional confinement above the Icebox. Impermeable rocks above the primary seal include the Roughlock Formation and the Red River D member, which make up the first additional group of confining formations (Table 2-16). Together with the Icebox, these formations are 512 ft thick and will isolate the Deadwood/Black Island Formations fluids from migrating upward into the next permeable interval, the Red River A, B, and C' members (see Figure 2-38). Above the Red River Formation, >1,000 ft of impermeable rocks act as an additional seal between the Red River and Broom Creek; the next proposed storage complex, 876 ft of impermeable rocks separate the Broom Creek from the Inyan Kara and an additional 2,545 ft of impermeable rocks separates the Inyan Kara and the lowermost USDW, the Fox Hills Formation (see Figure 2-19). Confining layers above the Inyan Kara include the Skull Creek, Newcastle, Mowry, Greenhorn, and Pierre Formations (Table 2-16).

Table 2-23. Elastic Properties Obtained Through Experimentation. E = Young's Modulus, ν = Poisson's Ratio, K = Bulk Modulus, G = Shear Modulus, P = Uniaxial Strain Modulus

Table 2-24. Velocity and Dynamic Properties Obtained Through Experimentation. V_p = P-Wave Velocity, V_s = Shear Wave Velocity, E = Young's Modulus, ν = Poisson's Ratio

Table 2-16. Description of Zones of Confinement above the Immediate Upper Confining Zone (data based on the J-RÖC1 well)

Figure 2-38. Isopach map of the interval between the top of the Black Island Formation and the top of the Swift Formation. This interval represents the primary and secondary confinement zones.

provide additional opportunities for monitoring, mitigation, and remediation.

No known transmissible faults are within these confining systems in the project area. These formations between the Deadwood, Broom Creek, and Inyan Kara and between the Inyan Kara and lowest USDW have demonstrated the ability to prevent the vertical migration of fluids throughout geologic time and are recognized as impermeable flow barriers in the Williston Basin (Downey, 1986; Downey and Dinwiddie, 1988).

Carbonates of the Red River A, B, and C members comprise the first unit with relatively high porosity and permeability above the injection zone and primary sealing formation. The Red River represents the most likely candidate to act as an overlying pressure dissipation zone. The depth to the Red River Formation in the project area is approximately 8,438 ft, and the formation itself is about 450 ft thick. In the unlikely event of out-of-zone migration through the primary and secondary sealing formations, CO₂ would become trapped in the Red River Formation. Monitoring DTS (distributed temperature sensor) data for the Red River Formation using the downhole fiber optic cable in the proposed monitor well provides an additional opportunity for mitigation and remediation (Section 4.0).

Table 2-16. Description of Zones of Confinement above the Immediate Upper Confining Zone (data based on the J-ROC1 well)

Name of Formation	Lithology	Formation Top Depth, ft	Thickness, ft	Depth below Lowest Identified USDW, ft
Pierre	Shale	1,150	1862	0
Greenhorn	Shale	3,012	391	1,862
Mowry	Shale	3,403	56	2,253
Skull Creek	Shale	3,458	235	2,308
Swift	Shale	3,864	473	2,714
Rierdon	Shale	4,337	147	3,187
Piper (Kline member)	Limestone	4,484	110	3,334
Piper (Picard)	Shale	4,594	91	3,444
Opeche	Shale/mudstone	4,685	55	3,535
Amstien	Dolostone/anhydrite	4,974	247	3,824
Kibbey Lime	Limestone	5,384	31	4,234
Charles	Limestone/anhydrite	5,526	147	4,376
Bakken	Shale	6,926	10	5,776
Birdbear	Limestone	7,075	74	5,925
Duperow	Limestone/dolostone	7,149	272	5,999
Spurs River	Dolostone/limestone	7,421	173	6,271
Dawson Bay	Dolostone	7,596	729	6,446
Gunton	Dolostone/limestone	8,323	39	7,173
Stoughton	Shale/limestone	8,364	91	7,214
Lower Red River	Limestone	8,645	488	7,495
Roughlock	Shale/limestone	9,133	25	7,983

Figure 2-19. Isopach map of the interval between the top of the Inyan Kara Formation and the top of the Pierre Formation. This interval represents the tertiary confinement zone.

<p>Area of Review Delineation</p>	<p>NDAC 43-05-01-05 §1j & §1b(3)</p>	<p>NDAC 43-05-01-05 §1j j. An area of review and corrective action plan that meets the requirements pursuant to section 43-05-01-05.1;</p> <p>NDAC 43-05-01-05 §1b(3) (3) A review of the data of public record, conducted by a geologist or engineer, for all wells within the facility area, which penetrate the storage reservoir or primary or secondary seals overlying the reservoir, and all wells within the facility area and within one mile [1.61 kilometers], or any other distance as deemed necessary by the commission, of the facility area boundary. The review must include the following:</p>	<p>The carbon dioxide storage reservoir area of review includes the areal extent of the storage reservoir and one mile outside of the storage reservoir boundary, plus the maximum extent of the pressure front caused by injection activities. The area of review delineation must include the following:</p>	<p>3.0 AREA OF REVIEW</p> <p>3.1 AOR Delineation</p> <p>3.1.1 Written Description North Dakota carbon dioxide (CO₂) storage regulations require that each storage facility permit delineate an area of review (AOR), which is defined as "the region surrounding the geologic storage project where underground sources of drinking water (USDWs) may be endangered by the injection activity" (North Dakota Administrative Code [NDAC] § 43-05-01-01[4]). Concern regarding the endangerment of USDWs is related to the potential vertical migration of CO₂ and/or brine from the injection zone to the USDW. Therefore, the AOR encompasses the region overlying the injected free-phase CO₂ and the region overlying the extent of formation fluid pressure (Figure 3-1) increase sufficient to drive formation fluids (e.g., brine) into USDWs, assuming pathways for this migration (e.g., abandoned wells or fractures) are present. The minimum fluid pressure increase in the reservoir that results in a sustained flow of brine upward into an overlying drinking water aquifer is referred to as the "critical threshold pressure increase" and resultant pressure as the "critical threshold pressure." Application of the U.S. Environmental Protection Agency (EPA) method shows the critical threshold pressure increase at the top of the Deadwood Formation using site-specific data from J-ROC1 was determined to be 127 psi (Appendix A, Table A-4).</p> <p>Appendix A includes a detailed discussion on the computational modeling and simulations (e.g., CO₂ plume extent, pressure front, AOR boundary, etc.), assumptions, and justification used to delineate the AOR and method for delineation of the AOR.</p> <p>NDAC § 43-05-01-05 subsection 1(b)(3) requires, "A review of the data of public record, conducted by a geologist or engineer, for all wells within the facility area, which penetrate the storage reservoir or primary or secondary seals overlying the reservoir, and all wells within the facility area and within one mile [1.61 kilometers], or any other distance as deemed necessary by the commission, of the facility area boundary." Based on the computational methods used to simulate CO₂ injection activities and associated pressure front (Figure 3-1), the resulting AOR for Tundra SGS is delineated as being 1 mi beyond the storage facility area boundary. This extent ensures compliance with existing state regulations.</p> <p>All wells located in the AOR that penetrate the storage reservoir and its primary overlying seal were evaluated (Figures 3-2 through 3-5) by a professional engineer pursuant to NDAC § 43-05-01-05 subsection 1(b)(3). The evaluation was performed to determine if corrective action is required and included a review of all available well records (Table 3-1). The evaluation determined that all abandoned wells within the AOR have sufficient isolation to prevent formation fluids or injected CO₂ from vertically migrating outside of the storage reservoir or into USDWs and that no corrective action is necessary (Tables 3-2 through 3-5 and Figures 3-6 through 3-8).</p> <p>An extensive geologic and hydrogeologic characterization performed by a team of geologists from the Energy & Environmental Research Center (EERC) resulted in no evidence of transmissive faults or fractures in the upper confining zone within the AOR and revealed that the upper confining zone has sufficient geologic integrity to prevent vertical fluid movement. All geologic data and investigations indicate the storage reservoir within the AOR has sufficient containment and geologic integrity, including geologic confinement above and below the injection zone, to prevent vertical fluid movement.</p> <p>This section of the storage facility permit application is accompanied by maps and tables that include information required and in accordance with NDAC §§ 43-05-01-05 subsections 1(a) and 1(b) and 43-05-01-05.1 subsection 2, such as the storage facility area, location of any proposed injection wells or monitoring wells, presence of significant surface structures or land disturbances, and location of water wells and any other wells within the AOR. Table 3-1 lists all the surface and subsurface features that were investigated as part of the AOR evaluation; pursuant to NDAC §§ 43-05-01-05 subsections 1(a) and 1(b)(3) and 43-05-01-05.1 subsection 2. Surface features that were investigated but not found within the AOR boundary were identified in Table 3-1.</p> <p>See Appendix A – DATA, PROCESSING, AND OUTCOMES OF CO₂ STORAGE GEOMODELING AND SIMULATIONS.</p>
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<p>NDAC 43-05-01-05 §1b(3) & §1a</p>	<p>NDAC 43-05-01-05 §1b(3) (3) A review of the data of public record, conducted by a geologist or engineer, for all wells within the facility area, which penetrate the storage reservoir or primary or secondary seals overlying the reservoir, and all wells within the facility area and within one mile [1.61 kilometers], or any other distance as deemed necessary by the commission, of the facility area boundary. The review must include the following:</p> <p>NDAC 43-05-01-05 §1a a. A site map showing the boundaries of the storage reservoir and the location of all proposed wells, proposed cathodic protection boreholes, and surface facilities within the carbon dioxide storage facility area;</p>	<p>a. A map showing the following within the carbon dioxide reservoir area:</p> <ul style="list-style-type: none"> i. Boundaries of the storage reservoir ii. Location of all proposed wells iii. Location of proposed cathodic protection boreholes iv. Any existing or proposed above ground facilities, 	<p>3.1.2 Supporting Maps</p>	<p>Figure 3-2. Final AOR map showing the storage facility area and AOR boundaries. The black circles represent occupied dwellings, and yellow boundaries represent buildings.</p>
<p>NDAC 43-05-01-05 §1b(2)(a)</p>	<p>NDAC 43-05-01-05 §1b(2)(a) (a) All wells, including water, oil, and natural gas exploration and development wells, and other man-made subsurface structures and activities, including coal mines, within the facility area and within one mile [1.61 kilometers] of its outside boundary;</p>	<p>b. A map showing the following within the storage reservoir area and within one mile outside of its boundary:</p> <ul style="list-style-type: none"> i. All wells, including water, oil, and natural gas exploration and development wells ii. All other man-made subsurface structures and activities, including coal mines; 	<p>3.1.2 Supporting Maps</p>	<p>Figure 3-3. AOR map in relation to nearby legacy wells and groundwater wells. Shown are the storage facility area and AOR boundaries.</p> <p>Figure 3-3. AOR map in relation to nearby legacy wells and groundwater wells. Shown are the storage facility area and AOR boundaries.</p>
<p>NDAC 43-05-01-05 §1c NDAC 43-05-01-05.1 §1a</p>	<p>NDAC 43-05-01-05 §1c c. The extent of the pore space that will be occupied by carbon dioxide as determined by utilizing all appropriate geologic and reservoir</p>	<p>c. A description of the method used for delineating the area of review, including:</p> <ul style="list-style-type: none"> i. The computational model to be used ii. The assumptions that will be made 	<p>Appendix A – DATA, PROCESSING, AND OUTCOMES OF CO₂ STORAGE GEOMODELING AND SIMULATIONS</p>	

	<p>engineering information and reservoir analysis, which must include various computational</p> <p>NDAC 43-05-01-05.1 §1a</p> <p>a. The method for delineating the area of review, including the model to be used, assumptions that will be made, and the site characterization data on which the model will be based;</p>	<p>iii. The site characterization data on which the model will be based;</p>		
<p>NDAC 43-05-01-05.1 §1b(1-4)</p>	<p>b. A description of:</p> <p>(1) The reevaluation date, not to exceed five years, at which time the storage operator shall reevaluate the area of review;</p> <p>(2) The monitoring and operational conditions that would warrant a reevaluation of the area of review prior to the next scheduled reevaluation date;</p> <p>(3) How monitoring and operational data (e.g., injection rate and pressure) will be used to inform an area of review reevaluation; and</p> <p>(4) How corrective action will be conducted to meet the requirements of this section; including what corrective action will be performed prior to injection</p>	<p>d. A description of:</p> <p>(1) The reevaluation date, not to exceed five years, at which time the storage operator shall reevaluate the area of review;</p> <p>(2) Any monitoring and operational conditions that would warrant a reevaluation of the area of review prior to the next scheduled reevaluation date;</p> <p>(3) How monitoring and operational data (e.g., injection rate and pressure) will be used to inform an area of review reevaluation;</p> <p>(4) How corrective action will be conducted if necessary, including:</p> <p>a. What corrective action will be performed prior to injection</p> <p>b. How corrective action will be adjusted if there are changes in the area of review;</p>	<p>3.3 Reevaluation of AOR and Corrective Action Plan</p> <p>Minnkota will periodically reevaluate the AOR and corrective action plan in accordance with NDAC § 43-05-01-05.1, with the first reevaluation taking place not later than the fifth anniversary of NDIC's issuance of a permit to operate under NDAC § 43-05-01-10 and every fifth anniversary thereafter (each being a Reevaluation Date). The AOR reevaluations will address the following:</p> <ul style="list-style-type: none"> • Any changes to the monitoring and operational data prior to the scheduled Reevaluation Date. • Monitoring and operational data (e.g., injection rate and pressure) will be used to update the geologic model and computational simulations. These updates will then be used to inform a reevaluation of the AOR and corrective action plan, including the computational model that was used to determine the AOR, and operational data to be utilized as the basis for that update will be identified. • The protocol to conduct corrective action, if necessary, will be conducted, including 1) what corrective action will be performed and 2) how corrective action will be adjusted if there are changes in the AOR. 	

		and what, if any, portions of the area of review will have corrective action addressed on a phased basis and how the phasing will be determined; how corrective action will be adjusted if there are changes in the area of review; and how site access will be guaranteed for future corrective action.			
NDAC 43-05-01-05 §1b(2)(b)	NDAC 43-05-01-05 §1b(2)(b) (b) All man-made surface structures that are intended for temporary or permanent human occupancy within the facility area and within one mile [1.61 kilometers] of its outside boundary;	e. A map showing the areal extent of all man-made surface structures that are intended for temporary or permanent human occupancy within the storage reservoir area, and within one mile outside of its boundary;	3.1.2 Supporting Maps		Figure 3-2. Final AOR map showing the storage facility area and AOR boundaries. The black circles represent occupied dwellings, and yellow boundaries represent buildings.
NDAC 43-05-01-05 §1b(2)¶	NDAC 43-05-01-05 §1b(2) (2) A geologic and hydrogeologic evaluation of the facility area, including an evaluation of all existing information on all geologic strata overlying the storage reservoir, including the immediate caprock containment characteristics and all subsurface zones to be used for monitoring. The evaluation must include any available geophysical data and assessments of any regional tectonic activity, local seismicity and regional or local fault zones, and a comprehensive description of local and	f. A map and cross section identifying any productive existing or potential mineral zones occurring within the storage reservoir area and within one mile outside of its boundary;	2.6 Potential Mineral Zones There has been no historic hydrocarbon exploration in, or production from, formations above the Deadwood Formation in the storage facility area. The only hydrocarbon exploration well near the storage facility area, the Herbert Dresser 1-34 (NDIC File No. 4937), was drilled in 1970 to explore potential hydrocarbons in the Charles Formation. The well was dry and did not suggest the presence of hydrocarbons. There are no known producible accumulations of hydrocarbons in the storage facility area. Shallow gas resources can be found in many areas of North Dakota. North Dakota regulations define shallow gas resources as "gas produced from a zone that consists of strata or formation, including lignite or coal strata or seam, located above the depth of five thousand feet (1,524 meters) below the surface, or located more than five thousand feet (1,524 meters) below the surface but above the top of the Rierdon Formation (Jurassic), from which gas may be produced." Lignite coal currently is mined in the area of the Center coal mine, operated by BNI Coal. The Center Mine currently mines the Hagel coal seam for use as fuel at Minnkota's MRYS. The Hagel coal seam is the lowermost major lignite present in the area in the Sentinel Butte Formation. Thickness of the Hagel coal seam averages 7.8 ft in the area permitted to be mined but varies, with some areas exceeding 10 ft in thickness (Figure 2-65) (Ellis and others, 1999). Coal seams in the Bullion Creek Formation exist in the area below the Hagel seam, but currently the Hagel is the only economically minable seam with its thickness and overburden of 100 ft or less (Figure 2-66). The thickness of the Hagel and other coal seams in the Fort Union Group thicken and deepen to the west. The overlying Beulah-Zap coal seam pinches out farther to the west but is economically minable in the central part of Mercer County at North American Coal's Coteau Mine. The Hagel seam pinches out to the east, and there are no other coal seams mined farther east than the Hagel.		Figure 2-65. Hagel net coal isopach map (modified from Ellis and others, 1999). Figure 2-66. Hagel overburden isopach map (modified from Ellis and others, 1999)

	<p>regional structural or stratigraphic features. The evaluation must describe the storage reservoir's mechanisms of geologic confinement, including rock properties, regional pressure gradients, structural features, and adsorption characteristics with regard to the ability of that confinement to prevent migration of carbon dioxide beyond the proposed storage reservoir. The evaluation must also identify any productive existing or potential mineral zones occurring within the facility area and any underground sources of drinking water in the facility area and within one mile [1.61 kilometers] of its outside boundary. The evaluation must include exhibits and plan view maps showing the following:</p>			
<p>NDAC 43-05-01-05 §1b(3) NDAC 43-05-01-05:1 §2b</p>	<p>NDAC 43-05-01-05 §1b(3) (3) A review of the data of public record, conducted by a geologist or engineer, for all wells within the facility area, which penetrate the storage reservoir or primary or secondary seals overlying the reservoir, and all wells within the facility area and within one mile [1.61 kilometers], or any other distance as deemed necessary by the commission, of the facility area boundary.</p>	<p>g. A map identifying all wells within the area of review, which penetrate the storage formation or primary or secondary seals overlying the storage formation.</p>	<p>3.1.2 Supporting Maps</p>	<p>Figure 3-4. The AOR map in relation to nearby legacy wells. Shown are the storage facility area (purple boundary), Center city limits (yellow dotted boundary), and AOR (gray boundary). Orange circles represent nearby legacy wells near the project area, including within the AOR.</p>

	<p>The review must include the following:</p> <p>NDAC 43-05-01-05.1 §2b</p> <p>b Using methods approved by the commission, identify all penetrations, including active and abandoned wells and underground mines, in the area of review that may penetrate the confining zone. Provide a description of each well's type, construction, date drilled, location, depth, record of plugging and completion, and any additional information the commission may require; and</p>			
<p>NDAC 43-05-01-05 §1b(3)(a)</p> <p>NDAC 43-05-01-05 §1b(3)(b)</p> <p>NDAC 43-05-01-05 §1b(3)(c)</p>	<p>NDAC 43-05-01-05 §1b(3)(a)</p> <p>(a) A determination that all abandoned wells have been plugged and all operating wells have been constructed in a manner that prevents the carbon dioxide or associated fluids from escaping from the storage reservoir;</p> <p>NDAC 43-05-01-05 §1b(3)(b)</p> <p>(b) A description of each well's type, construction, date drilled, location, depth, record of plugging, and completion;</p>	<p>h. A review of these wells must include the following:</p> <p>(1) A determination that all abandoned wells have been plugged in a manner that prevents the carbon dioxide or associated fluids from escaping the storage formation;</p> <p>(2) A determination that all operating wells have been constructed in a manner that prevents the carbon dioxide or associated fluids from escaping the storage formation;</p> <p>(3) A description of each well:</p> <ul style="list-style-type: none"> a. Type b. Construction c. Date drilled d. Location e. Depth f. Record of plugging g. Record of completion <p>(4) Maps and stratigraphic cross sections of all underground sources of drinking water within the area of review indicating the following:</p>	<p>3.2 Corrective Action Evaluation:</p> <p>Table 3-2. Wells in AOR Evaluated for Corrective Action</p> <p>Table 3-3. Little Boot 15-44 (NDIC File No. 8144) Well Evaluation</p> <p>Table 3-4. J-ROC1 (NDIC File No. 37672) Well Evaluation</p> <p>Table 3-5. J-LOC1 (NDIC File No. 37380) Well Evaluation</p> <p>Table 3-1. Investigated and Identified Surface and Subsurface Features (Figures 3-1 through 3-5)</p>	<p>Figure 3-6. Little Boot 15-44 (NDIC File No. 8144) well schematic showing the location and thickness of cement plugs.</p> <p>Figure 3-7. J-ROC1 (NDIC File No. 37672) well schematic showing the location and thickness of cement plugs.</p> <p>Figure 3-8. J-LOC1 (NDIC File No. 37380) as-constructed well schematic showing the final installation equipment used inside the wellbore to isolate perforations.</p>

NDAC 43-05-01-05 §1b(3)(d)	NDAC 43-05-01-05 §1b(3)(c)	<ul style="list-style-type: none"> a. Their positions relative to the injection zone b. The direction of water movement, where known c. General vertical and lateral limits d. Water wells e. Springs 		
NDAC 43-05-01-05 §1b(3)(e)	(c) Maps and stratigraphic cross sections indicating the general vertical and lateral limits of all underground sources of drinking water, water wells, and springs within the area of review; their positions relative to the injection zone; and the direction of water movement, where known;	(5) Map and cross sections of the area of review;		
	NDAC 43-05-01-05 §1b(3)(d)	(6) A map of the area of review showing the following:		
	(d) Maps and cross sections of the area of review;	<ul style="list-style-type: none"> a. Number or name and location of all injection wells b. Number or name and location of all producing wells c. Number or name and location of all abandoned wells d. Number or name and location of all plugged wells or dry holes e. Number or name and location of all deep stratigraphic boreholes f. Number or name and location of all state-approved or United States Environmental Protection Agency-approved subsurface cleanup sites g. Name and location of all surface bodies of water h. Name and location of all springs i. Name and location of all mines (surface and subsurface) j. Name and location of all quarries k. Name and location of all water wells l. Name and location of all other pertinent surface features m. Name and location of all structures intended for human occupancy n. Name and location of all state, county, or Indian country boundary lines o. Name and location of all roads 		
NDAC 43-05-01-05 §1b(3)(b)(f)	NDAC 43-05-01-05 §1b(3)(e)			
	(e) A map of the area of review showing the number or name and location of all injection wells, producing wells, abandoned wells, plugged wells or dry holes, deep stratigraphic boreholes, state-approved or United States environmental protection agency-approved subsurface cleanup sites, surface bodies of water, springs, mines (surface and subsurface),			

		<p>quarries, water wells, other pertinent surface features, including structures intended for human occupancy, state, county, or Indian country boundary lines, and roads;</p> <p>NDAC-43-05-01-05 §1b(3)(b)(f) (f) A list of contacts, submitted to the commission, when the area of review extends across state jurisdiction boundary lines;</p>	<p>(7) A list of contacts, submitted to the Commission, when the area of review extends across state jurisdiction boundary lines.</p>		
<p>NDAC 43-05-01-05 §1b(3)(g)</p>	<p>NDAC 43-05-01-05 §1b(3)(g) (g) Baseline geochemical data on subsurface formations, including all underground sources of drinking water in the area of review, and</p>	<p>(7) Baseline geochemical data on subsurface formations, including all underground sources of drinking water in the area of review.</p>	<p>Appendix C - FRESHWATER WELL FLUID-SAMPLING LABORATORY ANALYSIS</p> <p>3.4 Protection of USDWs</p> <p>3.4.1 Introduction of USDW Protection The primary confining zone and additional overlying confining zones geologically isolate the Fox Hills Formation, the deepest USDW in the AOR. The Icebox Formation is the primary confining zone with additional confining layers above, which geologically isolates all USDWs from the injection zone (Table 3-6).</p> <p>3.4.2 Geology of USDW Formations The hydrogeology of western North Dakota comprises several shallow freshwater-bearing formations of the Quaternary, Tertiary, and upper Cretaceous-aged sediments underlain by multiple saline aquifer systems of the Williston Basin (Figure 3-9). These saline and freshwater systems are separated by the Cretaceous Pierre Shale of the Williston Basin, a regionally extensive shale between 1000 and 1500 ft thick (Thamke and others, 2014).</p> <p>The freshwater aquifers comprise the Cretaceous Fox Hills and Hell Creek Formations; overlying Cannonball, Tongue River, and Sentinel Butte Formations of Tertiary Fort Union Group, and the Tertiary Golden Valley Formation (Figure 3-10). Above these are undifferentiated alluvial and glacial drift Quaternary aquifer layers, which are not necessarily present in all parts of the AOR (Croft, 1973).</p> <p>The lowest USDW in the AOR is the Fox Hills Formation, which together with the overlying Hell Creek Formation, is a confined aquifer system. The Hell Creek Formation is a poorly consolidated unit composed of interbedded sandstone, siltstone, and claystones with occasional carbonaceous beds, all fluvial origin. The underlying Fox Hills Formation is interpreted as interbedded nearshore marine deposits of sand, silt, and shale deposited as part of the final Western Interior Seaway retreat (Fischer, 2013). The Fox Hills Formation in the AOR is approximately 700 to 900 ft deep and 200 to 350 ft thick. The structure of the Fox Hills and Hell Creek Formations follows that of the Williston Basin, dipping gently toward the center of the basin to the northwest of the AOR (Figure 3-11).</p> <p>The Pierre Shale is a thick, regionally extensive shale unit, which forms the lower boundary of the Fox Hills–Hell Creek system, also isolating all overlying freshwater aquifers from the deeper saline aquifer systems. The Pierre shale is a dark gray to black marine shale and is typically 1000 ft thick in the AOR (Thamke and others, 2014).</p> <p>3.4.3 Hydrology of USDW Formations The aquifers of the Fox Hills and Hell Creek Formations are hydraulically connected and function as a single confined aquifer system (Fischer, 2013). The Bacon Creek Member of the Hell Creek Formation forms a regional aquitard for the Fox Hills–Hell Creek aquifer system, which isolates it from the overlying aquifer layers. Recharge for the Fox Hills–Hell Creek aquifer system occurs in southwestern North Dakota along the Cedar Creek Anticline and discharges into overlying</p>	<p>Table 3-6. Description of Zones of Confinement above the Immediate Upper Confining Zone (data based on the J-ROC 1 well)</p> <p>Figure 3-9. Major aquifer systems of the Williston Basin.</p> <p>Figure 3-10. Upper stratigraphy of Oliver County showing the stratigraphic relationship of Cretaceous and Tertiary groundwater-bearing formations (modified from Croft, 1973).</p> <p>Figure 3-11. Depth to surface of the Fox Hills Formation in western North Dakota (Fischer, 2013).</p> <p>Figure 3-12. Potentiometric surface of the Fox Hills–Hell Creek aquifer system shown in feet of hydraulic head above sea level. Flow is to the northeast through the area of investigation in central Oliver County (modified from Fischer, 2013).</p> <p>Figure 3-13. Map of water wells in the AOR in relation to the McCall-1 planned injection well, the NRDT-1 proposed monitoring well, storage facility area, AOR, and legacy oil and gas wells.</p> <p>Figure 3-14. West–east cross section of the major regional aquifer layers in Mercer and Oliver Counties and their associated geologic relationships (modified from Croft, 1973). The black dots on the inset map represent the</p>	

			<p>strata under central and eastern North Dakota (Fischer, 2013). Flow through the AOR is to the east (Figure 3-12). Water sampled from the Fox Hills Formation is a sodium bicarbonate type with a total dissolved solids (TDS) content of approximately 1,500–1,600 ppm. Previous analysis of Fox Hills Formation water has also noted high levels of fluoride, more than 5 mg/L (Trapp and Croft, 1975). As such, the Fox Hills–Hell Creek system is typically not used as a primary source of drinking water. However, it is occasionally produced for irrigation and/or livestock watering.</p> <p>Based on the North Dakota State Water Commission (SWC) database, eight water wells penetrate the Fox Hills Formation in the AOR (Figure 3-13). One observation well monitored by the U.S. Geological Survey is located 1 mi east of Center, North Dakota, nearly 5 mi northwest of the McCall-1 injection site. One well is 5 mi northeast of the injection site along North Dakota Highway 25 and is used for stock. The status of the remaining six wells is under investigation. One well is about 9 mi southeast of the injection site near a legacy oil exploratory well and is permitted as an industrial well. Five wells lie to the southwest. Three wells are about 3, 11, and 12 mi from the injection site and are permitted as domestic water supply. The last two wells are located on adjacent sections 11 mi from the injection site, one is permitted for stock, and the other's purpose is unknown.</p> <p>Multiple other freshwater-bearing units, primarily of Tertiary age, overlie the Fox Hills–Hell Creek aquifer system in the AOR (Figure 3-14). These formations are often used for domestic and agricultural purposes. The Cannonball and Tongue River Formations comprise the major aquifer units of the Fort Union Group, which overlies the Hell Creek Formation. The Cannonball Formation consists of interbedded sandstone, siltstone, claystone, and thin lignite beds of marine origin. The Tongue River Formation is predominantly sandstone interbedded with siltstone, claystone, lignite, and occasional carbonaceous shales. The basal sandstone member of the Tongue River is persistent and a reliable source of groundwater in the region. The thickness of this basal sand ranges from approximately 200 to 500 ft and directly underlies surficial glacial deposits in the area of investigation. Tongue River groundwaters are generally a sodium bicarbonate type with a TDS of approximately 1,000 ppm (Croft, 1973).</p> <p>The Sentinel Butte Formation, a silty fine-to-medium-grained sandstone with claystone and lignite interbeds, overlies the Tongue River Formation in the extreme western portion of the AOR. The Sentinel Butte Formation is predominantly sandstone with lignite interbeds. While the Sentinel Butte Formation is another important source of groundwater in the region, primarily to the west of the AOR, the Sentinel Butte is not a source of groundwater within the AOR. TDS in the Sentinel Butte Formation range from approximately 400–1,000 ppm (Croft, 1973).</p> <p>3.4.4 Protection for USDWs The Fox Hills–Hell Creek aquifer system is the lowest USDW in the AOR. The injection zone (Deadwood Formation) and lowest USDW (Fox Hills–Hell Creek aquifer system) are isolated geologically and hydrologically by multiple impermeable rock layers consisting of shale and carbonate formations of Ordovician, Silurian, Devonian, Carboniferous, Permian, Jurassic, and Cretaceous ages (Figure 3-9). The primary seal of the injection zone is the Ordovician-aged Ioebox Formation with shales of the Ordovician-aged Roughlock and Stoughton, Mississippian–Devonian-aged Bakken, Permian-aged Opeche, Jurassic-aged Piper (Picard), Rierdon, and Swift Formations, all of which overlie the Ioebox Formation. Above the Swift is the confined saltwater aquifer system of the Inyan Kara Formation, which extends across much of the Williston Basin. The Inyan Kara Formation will be monitored for temperature and pressure changes via fiber optic lines installed in the injection well, McCall-1 and the NRDT-1 monitoring well. Above the Inyan Kara Formation are the Cretaceous-aged shale formations, which are named the Skull Creek, Mowry, Belle Fourche, Greenhorn, Carlisle, Niobrara, and Pierre. The Pierre Formation is the thickest shale formation in the AOR and the primary geologic barrier between the USDWs and the injection zone. The geologic strata overlying the injection zone consist of multiple impermeable rock layers that are free of transmissive faults or fractures and provide adequate isolation of the USDWs from CO₂ injection activities in the AOR.</p>	<p>locations of the water wells illustrated on the cross sections</p>
<p>Required Plans</p>	<p>NDAC 43-05-01-05 §1k NDAC 43-05-01-05 §1k</p>	<p>Financial Assurance Demonstration</p>	<p>4.3 Financial Assurance Demonstration Plan; See Appendix G</p> <p>4.3.1 Approach to Meeting Financial Responsibility Requirements</p> <p>4.3.1.1 Corrective Action</p> <p>4.3.1.2 Injection Well-Plugging Program</p> <p>4.3.1.3 Postinjection Site Care and Facility Closure</p>	

4.3.1.4 Emergency and Remedial Response

4.3.1.5 Endangerment of Drinking Water Sources

4.3.2 Approach to Financial Risk

4.3.3 Selected Elements of Applicant's Analysis of Inherent Risks

4.3.4 Costs Estimates

Table 4-14. Potential Future Costs Covered by Financial Assurance in \$K

Activity	Total Cost	Covered by Special-Purpose Trust	Covered by Commercial Insurance	Details in Supporting Table
Corrective Action on Wells in AOR	\$0	\$0	\$0	NA
Plugging Injection Wells	\$2,025	\$2,025	\$0	Table 4-14-1
Postinjection Site Care	\$10,285	\$10,285	\$0	Table 4-14-2
Site Closure	\$1,554	\$1,554	\$0	Table 4-14-3
Emergency and Remedial Response	\$16,560	\$5,960	\$10,600	Table 4-14-4
Endangerment of USDWs	\$2,240	\$0	\$2,240	Table 4-14-5
Total	\$32,664	\$19,824	\$12,840	

NDAC 43-05-01-05 §1d
 NDAC 43-05-01-05 §1d
 NDAC 43-05-01-05 §1e

b. An emergency and remedial response plan, pursuant to section 43-05-01-13;

c. A detailed worker safety plan that addresses the following:
 i. Carbon dioxide safety training
 ii. Safe working procedures at the storage facility;

4.2. Emergency and Remedial Response Plan; See Appendix E

4.2.1 Description of Project Area

4.2.2 Risk Identification and Severity

4.2.3 Response Protocols

4.2.4 Emergency Contacts

4.2.5 Emergency Communications Plan

4.2.6 ERRP Review

4.4 Worker Safety Plan (NDAC 43-05-01-05 §1e; NDAC 43-05-01-13)

4.4.1 Definitions

4.4.2 Stop Work Authority

4.4.3 Incident Notification and Response

4.4.4 Incident Report and Investigation

			<p>4.4.5 Training</p> <p>4.4.6 Contractor Qualification and Bridging Documents</p> <p>4.4.7 General Health, Safety, and Welfare</p> <p>4.4.8 Personal Protective Equipment</p> <p>4.4.9 Hand Safety</p> <p>4.4.10 Permitted Work Activities</p> <p>4.4.11 Chemical, Hazardous, or Flammable Materials</p> <p>4.4.12 Compressed Gas and Air Cylinders</p> <p>4.4.13 Overhead/Outside Guarded Area</p> <p>4.4.14 Work Site Conduct</p>	
NDAC 43-05-01-05 §1f	<p>NDAC 43-05-01-05 §1f</p> <p>f. A corrosion monitoring and prevention plan for all wells and surface facilities pursuant to section 43-05-01-15;</p>	d. A corrosion monitoring and prevention plan for all wells and surface facilities;	<p>4.1.2 Corrosion Monitoring and Prevention Plan</p> <p>4.1.2.1 Corrosion Threat Assessment</p> <p>4.1.2.2 Identification of Critical Components and Operating Conditions; See Appendix F</p> <p>4.1.2.3 Damage Mechanism</p> <p>4.1.2.4 Corrosion Control Program (CCP)</p> <p>4.1.2.5 Annual Review</p> <p>4.1.2.6 Data Management</p>	
NDAC 43-05-01-05 §1g	<p>NDAC 43-05-01-05 §1g</p> <p>g. A leak detection and monitoring plan for all wells and surface facilities pursuant to section 43-05-01-14. The plan must:</p> <p>(1) Identify the potential for release to the atmosphere;</p> <p>(2) Identify potential degradation of ground water resources with particular emphasis on underground sources of</p>	e. A surface leak detection and monitoring plan for all wells and surface facilities pursuant to North Dakota Administrative Code (NDAC) Section 43-05-01-14;	<p>4.1.3 Surface Leak Detection and Monitoring Plan</p>	

drinking water,
and

- (3) Identify potential migration of carbon dioxide into any mineral zone in the facility area.

NDAC 43-05-01-05 §1h
h. A leak detection and monitoring plan to monitor any movement of the carbon dioxide outside of the storage reservoir. This may include the collection of baseline information of carbon dioxide background concentrations in ground water, surface soils, and chemical composition of in situ waters within the facility area and the storage reservoir and within one mile (1.61 kilometers) of the facility area's outside boundary. Provisions in the plan will be dictated by the site characteristics as documented by materials submitted in support of the permit application but must:

- (1) Identify the potential for release to the atmosphere;
- (2) Identify potential degradation of ground water resources with particular emphasis on underground sources of drinking water, and

NDAC 43-05-01-05 §1h

A subsurface leak detection and monitoring plan to monitor for any movement of the carbon dioxide outside of the storage reservoir. This may include the collection of baseline information of carbon dioxide background concentrations in ground water, surface soils, and chemical composition of in situ waters within the facility area and the storage reservoir and within one mile of the facility area's outside boundary.

4.1.4 Subsurface Leak Detection and Monitoring Program

4.1.5 Near-Surface Groundwater and Soil Gas Sampling and Monitoring

4.1.6 Baseline Sampling Program

4.1.6.1 Groundwater Baseline Sampling

4.1.6.2 Soil Gas Baseline Sampling

<p>NDAC 43-05-01-05 §11</p>	<p>(3) Identify potential migration of carbon dioxide into any mineral zone in the facility area.</p> <p>g. A testing and monitoring plan pursuant to NDAC Section 43-05-01-11.4;</p>	<p>g. A testing and monitoring plan pursuant to NDAC Section 43-05-01-11.4;</p>	<p>4.1 Testing and Monitoring Plan</p> <p><i>4.1.1 Analysis of Injected CO₂ and Injection Well Testing</i></p> <p><i>4.1.1.1 CO₂ Analysis</i></p> <p><i>4.1.1.2 Injection Well Integrity Tests</i></p> <p><i>4.1.5 Near-Surface Groundwater and Soil Gas Sampling and Monitoring</i></p> <p><i>4.1.6 Baseline Sampling Program; See Appendix C</i></p> <p><i>4.1.6.1 Groundwater Baseline Sampling</i></p> <p><i>4.1.6.2 Soil Gas Baseline Sampling</i></p> <p><i>4.1.7 Near-Surface Monitoring Plan</i></p> <p><i>4.1.8 Deep Subsurface Monitoring of Free-Phase CO₂ Plume and Pressure Front</i></p> <p><i>4.1.8.1 Direct Monitoring Methods</i></p> <p><i>4.1.8.2 Indirect Monitoring Methods</i></p> <p><i>4.1.9 Quality Control and Surveillance Plan; See Appendix D</i></p>
<p>NDAC 43-05-01-05 §11</p>	<p>h. The proposed well casing and cementing program;</p>	<p>h. The proposed well casing and cementing program;</p>	<p>4.5 Well Casing and Cementing Program</p> <p><i>4.5.1 McCall-1 – Proposed Deadwood CO₂ Injection Well Casing and Cementing Programs</i></p> <p><i>4.5.2 NRDT-1 – Proposed Deadwood CO₂ Monitoring Well Casing and Cementing Programs</i></p>
<p>NDAC 43-05-01-05 §11m</p>	<p>i. A plugging plan.</p>	<p>i. A plugging plan.</p>	<p>4.6 Well P&A Program</p> <p><i>4.6.1 McCall-1 Deadwood CO₂ Injection Well Plugging and Abandonment</i></p> <p><i>4.6.1.1 McCall-1 Injection Well-Plugging Schematic</i></p> <p><i>4.6.1.2 Tentative Plugging Procedures</i></p> <p><i>4.6.2 NRDT-1 Deadwood Monitor Well Plugging and Abandonment</i></p> <p><i>4.6.2.1 NRDT-1 Monitor Well-Plugging Schematic</i></p> <p><i>4.6.2.2 Tentative Plugging Procedures</i></p>

NDAC 43-05-01-05 §1n
n. A postinjection site
care and facility closure
plan pursuant to section
43-05-01-19; and

1. A postinjection site care and facility
closure plan.

4.7 Postinjection Site and Facility Closure Plan

4.7.1 Predicted Postinjection Subsurface Condition

4.7.1.1 Pre- and Postinjection Pressure Differential

4.7.1.2 Predicted Extent of CO₂ Plume

4.7.1.3 Postinjection Monitoring Plan

4.7.2 Groundwater and Soil Gas Monitoring

4.7.3 Monitoring of CO₂ Plume and Pressure Front

4.7.3.1 Schedule for Submitting Postinjection Monitoring Results

4.7.3.2 Site Closure Plan

4.7.3.3 Submission of Site Closure Report, Survey, and Deed

NDAC 43-05-01-05 §1n

Storage Facility
Operations

NDAC 43-05-01-05 §1b(4)

NDAC 43-05-01-05 §1b(4)
(4) The proposed
calculated average and
maximum daily injection
rates, daily volume, and
the total anticipated
volume of the carbon
dioxide stream using a
method acceptable to and
filed with the
commission;

The following items are required as part of
the storage facility permit application

- a. The proposed average and maximum
daily injection rates;
- b. The proposed average and maximum
daily injection volume;
- c. The proposed total anticipated volume
of the carbon dioxide to be stored;

5.0 INJECTION WELL AND STORAGE OPERATIONS

This section of the storage facility permit (SFP) application presents the engineering criteria for completing and operating the injection well in a manner that protects underground sources of drinking water (USDWs). The information that is presented meets the permit requirements for injection well and storage operations as presented in North Dakota Administrative Code (NDAC) § 43-05-01-05 (SFP, Table 5-1) and NDAC § 43-05-01-11.3

Table 5-1. McCall-1 Proposed Deadwood Injection Well Operating Parameters

Predicted Metric	McCall-1	Description/Comments
Injection Volume		
Total Injected Volume, MMt	23.4	Based on 20 years of injection.
Injection Rate		
Predicted Average Injection Rate, tonnes per day	3,250	Based on total injected volumes for 20 years and using 365 operating days a year.
Maximum Predicted Daily Injection Rate, tonnes per day	3,865	Based on 20 years of injection.
Pressure		
Formation Fracture Pressure at Top Perforation, psi	6,866	The injectivity test results fracture closure gradient of 0.75 psi/ft.
Average Predicted Operating Surface Injection Pressure, psi	2,794	Based on 20 years of injection.

NDAC 43-05-01-05 §1b(5)

NDAC 43-05-01-05 §1b(5)
(5) The proposed average
and maximum
bottomhole injection
pressure to be utilized at
the reservoir. The
maximum allowed
injection pressure,
measured in pounds per
square inch gauge, shall
be approved by the
commission and
specified in the permit.
In approving a maximum
injection pressure limit,
the commission shall

d. The proposed average and maximum
bottomhole injection pressure to be
utilized;

	<p>consider the results of well tests and other studies that assess the risks of tensile failure and shear failure. The commission shall approve limits that, with a reasonable degree of certainty, will avoid initiating a new fracture or propagating an existing fracture in the confining zone or cause the movement of injection or formation fluids into an underground source of drinking water;</p>	<p>c. The proposed average and maximum surface injection pressures to be utilized;</p>	<table border="1"> <tr> <td>Maximum Wellhead Injection Pressure, psi</td> <td>3,445</td> <td>Maximum wellhead injection pressure is limited based on surface facility constraints and 90% of formation fracture pressure.</td> </tr> <tr> <td>Average Predicted Operating Bottomhole Pressure (BHP), psi</td> <td>6,139</td> <td>Based on 20 years of injection.</td> </tr> <tr> <td>Maximum BHP psi</td> <td>6,179</td> <td>Calculated maximum BHP using 90% of the closure pressure from the injectivity test at the top of the perforation. Maximum BHP is limited based on surface facility constraints.</td> </tr> </table>	Maximum Wellhead Injection Pressure, psi	3,445	Maximum wellhead injection pressure is limited based on surface facility constraints and 90% of formation fracture pressure.	Average Predicted Operating Bottomhole Pressure (BHP), psi	6,139	Based on 20 years of injection.	Maximum BHP psi	6,179	Calculated maximum BHP using 90% of the closure pressure from the injectivity test at the top of the perforation. Maximum BHP is limited based on surface facility constraints.																		
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Maximum BHP psi	6,179	Calculated maximum BHP using 90% of the closure pressure from the injectivity test at the top of the perforation. Maximum BHP is limited based on surface facility constraints.																												
<p>NDAC 43-05-01-05 §1b(6)</p>	<p>(6) The proposed preoperational formation testing program to obtain an analysis of the chemical and physical characteristics of the injection zone and confining zone pursuant to section 43-05-01-11.2;</p>	<p>f. The proposed preoperational formation testing program to obtain an analysis of the chemical and physical characteristics of the injection zone;</p> <p>g. The proposed preoperational formation testing program to obtain an analysis of the chemical and physical characteristics of the confining zone;</p>	<p>Table 4-8a. Logging Program for Deadwood Injector Well (McCall-1 [proposed])</p> <table border="1"> <thead> <tr> <th>Log</th> <th>Justification</th> <th>NDAC Section</th> </tr> </thead> <tbody> <tr> <td>Cased Hole Logs: ultrasonic CBL (cement bond log), VDL (variable-density log), GR (gamma ray), Temperature Log</td> <td>Identify cement bond quality radially. Detect cement channels. Evaluate the cement top and zonal isolation.</td> <td>43-05-01-11.2(1c)(2)</td> </tr> <tr> <td>Triple Combo (resistivity, density,* neutron,* GR, caliper) and SP (spontaneous potential)</td> <td>Quantify variability in reservoir properties such as resistivity and lithology. Identify the wellbore volume to calculate the required cement volume. Provide input for enhanced geomodeling and predictive simulation of CO₂ injection into the interest zones to improve test design and interpretations.</td> <td>43-05-01-11.2(1c)(1)</td> </tr> <tr> <td>*No density or neutron in surface section.</td> <td></td> <td></td> </tr> <tr> <td>Temperature Log</td> <td>Monitor wellbore temperature in the openhole. A temperature log will also be run in cased hole for temperature to DTS calibration.</td> <td>43-05-01-11.2(1c)(2)</td> </tr> <tr> <td>Spectral GR</td> <td>Identify clays and lithology that could affect injectivity.</td> <td>43-05-01-11.2(2)</td> </tr> <tr> <td>Dipole Sonic and 4-Arm Caliper</td> <td>Identify mechanical properties including stress anisotropy. Provide compression and shear waves for seismic tie-in and quantitative analysis of the seismic data.</td> <td>43-05-01-11.2(1c)(1)</td> </tr> <tr> <td>Fracture Finder Log</td> <td>Quantify fractures in the Broom Creek and Black Island/Deadwood Formations and confining layers to ensure safe, long-term storage of CO₂.</td> <td>43-05-01-11.2(1c)(1)</td> </tr> <tr> <td>MDT (modular dynamics testing) Fluid Sampling</td> <td>Collect fluid samples from the Broom Creek and Deadwood Formations for geochemical testing and TDS quantification.</td> <td>43-05-01-11.2(2)</td> </tr> </tbody> </table>	Log	Justification	NDAC Section	Cased Hole Logs: ultrasonic CBL (cement bond log), VDL (variable-density log), GR (gamma ray), Temperature Log	Identify cement bond quality radially. Detect cement channels. Evaluate the cement top and zonal isolation.	43-05-01-11.2(1c)(2)	Triple Combo (resistivity, density,* neutron,* GR, caliper) and SP (spontaneous potential)	Quantify variability in reservoir properties such as resistivity and lithology. Identify the wellbore volume to calculate the required cement volume. Provide input for enhanced geomodeling and predictive simulation of CO ₂ injection into the interest zones to improve test design and interpretations.	43-05-01-11.2(1c)(1)	*No density or neutron in surface section.			Temperature Log	Monitor wellbore temperature in the openhole. A temperature log will also be run in cased hole for temperature to DTS calibration.	43-05-01-11.2(1c)(2)	Spectral GR	Identify clays and lithology that could affect injectivity.	43-05-01-11.2(2)	Dipole Sonic and 4-Arm Caliper	Identify mechanical properties including stress anisotropy. Provide compression and shear waves for seismic tie-in and quantitative analysis of the seismic data.	43-05-01-11.2(1c)(1)	Fracture Finder Log	Quantify fractures in the Broom Creek and Black Island/Deadwood Formations and confining layers to ensure safe, long-term storage of CO ₂ .	43-05-01-11.2(1c)(1)	MDT (modular dynamics testing) Fluid Sampling	Collect fluid samples from the Broom Creek and Deadwood Formations for geochemical testing and TDS quantification.	43-05-01-11.2(2)
Log	Justification	NDAC Section																												
Cased Hole Logs: ultrasonic CBL (cement bond log), VDL (variable-density log), GR (gamma ray), Temperature Log	Identify cement bond quality radially. Detect cement channels. Evaluate the cement top and zonal isolation.	43-05-01-11.2(1c)(2)																												
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Fracture Finder Log	Quantify fractures in the Broom Creek and Black Island/Deadwood Formations and confining layers to ensure safe, long-term storage of CO ₂ .	43-05-01-11.2(1c)(1)																												
MDT (modular dynamics testing) Fluid Sampling	Collect fluid samples from the Broom Creek and Deadwood Formations for geochemical testing and TDS quantification.	43-05-01-11.2(2)																												

MDT Formation Pressure Testing	Collect reservoir pressure tests to establish a pressure profile and mobility.	43-05-01-11.2(2)
MDT Stress Testing	Collect breakdown pressure, fracture propagation pressure, fracture closure pressure (minimum in situ stress) to establish injection pressure limits.	43-05-01-11.2(1c1)
Sidewall Cores	Sidewall cores will be collected from the injection zones and associated confining zones.	43-05-01-11.2(2)

Table 4-8b. Logging Program for Deadwood Monitor Well (NRDT-1 proposed monitoring well)

Log	Justification	NDAC Section
Cased Hole Logs: Ultrasonic CBL, VDL, GR, Temperature Log	Identify cement bond quality radially. Detect cement channels. Evaluate the cement top and zonal isolation.	43-05-01-11.2(1c2)
Triple Combo and SP	Quantify variability in reservoir properties such as resistivity and lithology. Identify the wellbore volume to calculate the required cement volume. Provide input for enhanced geomodeling and predictive simulation of CO ₂ injection into the interest zones to improve test design and interpretations.	43-05-01-11.2(1c1)
Temperature Log	Monitor wellbore temperature in the openhole. A temperature log will also be run in cased hole for temperature to DTS calibration.	43-05-01-11.2(1c2)
Dipole Sonic and 4-Arm Caliper	Identify mechanical properties including stress anisotropy. Provide compression and shear waves for seismic tie-in and quantitative analysis of the seismic data.	43-05-01-11.2(1c1)

Appendix B - WELL AND WELL FORMATION FLUID SAMPLING LABORATORY ANALYSIS

5.1 Proposed Completion Procedure to Conduct Injection Operations in the Deadwood Injection Well
 Minnkota Power Cooperative (Minnkota) plans to construct one carbon dioxide (CO₂) injection well (McCall-1) designed by Oxy Low Carbon Ventures in compliance with Class VI UIC (underground injection control) injection well construction requirements, as discussed in previous sections and drilled according to the proposed program in the permit to drill. The following proposed completion procedure outlines the steps necessary to complete a Deadwood well for injection purposes (Figure 5-1, Table 5-2).

Table 5-2. McCall-1_Deadwood Injection Well Proposed Casing Properties
 Table 5-3. McCall-1_Deadwood CO₂ Injection Well Proposed Tubing Design

NDAC 43-05-01-05 §1b(7)
 (7) The proposed stimulation program, a description of stimulation fluids to be used, and a determination that stimulation will not interfere with containment; and

- h. The proposed stimulation program:
1. A description of the stimulation fluids to be used
 2. A determination of the probability that stimulation will interfere with containment;

NDAC 43-05-01-05 §1b(7)

NDAC 43-05-01-05 §1b(8)

NDAC 43-05-01-05 §1b(8)
 (8) The proposed procedure to outline steps necessary to conduct injection operations.

i. Steps to begin injection operations

5.1 Proposed Completion Procedure to Conduct Injection Operations in the Deadwood Injection Well
 Minnkota Power Cooperative (Minnkota) plans to construct one carbon dioxide (CO₂) injection well (McCall-1) designed by Oxy Low Carbon Ventures in compliance with Class VI UIC (underground injection control) injection well construction requirements, as discussed in previous sections and drilled according to the proposed program in the permit to drill. The following proposed completion procedure outlines the steps necessary to complete a Deadwood well for injection purposes (Figure 5-1, Table 5-2).

Table 5-1, McCall-1 Proposed Deadwood Injection Well Operating Parameters

Predicted Metric	McCall-1	Description/Comments
Injection Volume		
Total Injected Volume, MMt	23.4	Based on 20 years of injection.
Injection Rate		
Predicted Average Injection Rate, tonnes per day	3,250	Based on total injected volumes for 20 years and using 365 operating days a year.
Maximum Predicted Daily Injection Rate, tonnes per day	3,865	Based on 20 years of injection.
Pressure		
Formation Fracture Pressure at Top Perforation, psi	6,866	The injectivity test results fracture closure gradient of 0.75 psi/ft.
Average Predicted Operating Surface Injection Pressure, psi	2,794	Based on 20 years of injection.
Maximum Wellhead Injection Pressure, psi	3,445	Maximum wellhead injection pressure is limited based on surface facility constraints and 90% of formation fracture pressure.
Average Predicted Operating Bottomhole Pressure (BHP), psi	6,139	Based on 20 years of injection.
Maximum BHP psi	6,179	Calculated maximum BHP using 90% of the closure pressure from the injectivity test at the top of the perforation. Maximum BHP is limited based on surface facility constraints.

Predicted Metric	McCall-1	Description/Comments
Injection Volume		
Total Injected Volume, MMt	23.4	Based on 20 years of injection.
Injection Rate		
Predicted Average Injection Rate, tonnes per day	3,250	Based on total injected volumes for 20 years and using 365 operating days a year.
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Maximum BHP psi	6,179	Calculated maximum BHP using 90% of the closure pressure from the injectivity test at the top of the perforation. Maximum BHP is limited based on surface facility constraints.

5.2 WELL – Proposed Procedure for Monitoring Well Operations

1. Pick up work string with 8 3/4" bit to clean cement on top of the liner. Clean cement, circulate, and pull out of the hole.
2. Pick up work string with 6 3/4" and rotating scrapper to clean cement inside of the liner. Clean cement to the top of the landing collar.
3. Circulate with brine 10 ppg.
4. Test casing for 30 minutes with 1,500 psi. If the pressure decreases more than 10% in 30 minutes, bleed pressure, check surface lines and surface connections, and repeat test. If the failure persists, the Operator may require assessing the root cause and correcting it.
5. Pull bottomhole assembly (BHA) out of the hole.
6. Perform safety meeting to discuss logging and perforating operations.
7. Rig up logging truck.
8. Run cased hole logs by program. Note: run CBL/VDL (cement bond log/carriable-density log) and USIT (ultrasonic imaging tool) without pressure as a first pass and run it with 1,000 psi pressure as a second pass, if needed.

Note: In case the cementing logs show poor bonding in the cementing job, the results will be communicated to the North Dakota Industrial Commission (NDIC), and an action plan will be prepared.

9. Run perforating guns to the injection target.
 10. Perforate the Black Island and Deadwood Formation, minimum 4 spf (shots per foot). Depth will be defined with the final log. Gas gun technology or high-performance guns should be evaluated to provide deeper penetration into the formation.
 11. Pull guns out of the hole.
 12. Rig down logging truck.
 13. Pick up straddle packer and run in the hole with working string.
 14. Circulate with brine 10 ppg.
 15. Set packer in the Deadwood Formation to isolate the perforations.
 16. Rig up acid trucks and equipment.
 17. Perform cleaning of the perforations with acid. Adjust acid formulation and volumes with water samples and compatibility test.
 18. Rig down acid trucks and equipment.
 19. Perform an injectivity test/step rate test.
 20. Unset packer and circulate hole.
 21. Set packer in the Black Island Formation to isolate the perforations.
 22. Rig up acid trucks and equipment.
 23. Perform cleaning of the perforations with acid. Adjust acid formulation and volumes with water samples and compatibility test.
 24. Rig down acid trucks and equipment.
 25. Perform an injectivity test/step rate test.
 26. Unset packer and circulate hole.
 27. Pull packer and work string out of the hole.
 28. Rig up spooler and prepare rig floor to run upper completion.
 29. Run completion assembly per program.
 30. Circulate well with inhibited packer fluid.
 31. Set packer 50 ft above the top perforations.
 32. Install tubing sections, cable connector, and tubing hanger.
 33. Rig up logging truck.
 34. Run cased hole logs through tubing by program.
 35. Rig down logging truck.
 36. Nipple down BOP (blowout preventer).
 37. Install injection tree.
- Note: Figure 5-2 illustrates the proposed wellhead schematic.
38. Rig down equipment.

Note: DTS/DAS (distributed temperature sensing/distributed acoustic sensing) fiber optic will be run and attached to the exterior of the intermediate casing. Special clamps, bands, and centralizers will be installed to protect the fiber and provide a marker for wireline operations.

				<p>Note: Liner hanger should include top packer seal.</p> <p>The McCall-1_Deadwood CO₂ Injection Well Proposed Tubing Design is detailed in the following section (Table 5-3).</p> <ol style="list-style-type: none">1. Packer depth will be adjusted with the final perforation depth interval.2. Packer will be set 50 ft above top perforations.3. Packer is required to be nickel-plated with HNBR elastomers.4. Inconel cable along with quartz pressure and temperature gauges will be run in upper completion.	
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Minnkota Power Cooperative, Inc.

Case No. 29032

Application of Minnkota Power Cooperative, Inc. requesting consideration for the geologic storage of carbon dioxide from the Milton R. Young Station located in Sections 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 17, 18, 19, 20, 21, Township 141 North, Range 83 West, Sections 1, 2, 12, 13, Township 141 North, Range 84 West, Sections 19, 20, 21, 22, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, Township 142 North, Range 83 West, Sections 35, 36, Township 142 North, Range 84 West, Oliver County, North Dakota pursuant to North Dakota Administrative Code Section 43-05-01. View the draft storage facility permit, fact sheet, and storage facility permit application at www.dmr.nd.gov/oilgas/. Minnkota intends to capture carbon dioxide from the Milton R. Young Station and sequester it in the Deadwood Formation. The Commission will accept and consider written comments on the merits of the application and draft permit if received no later than 5:00 pm CDT November 1, 2021. Submit written comments to the Oil and Gas Division, 1016 East Calgary Avenue, Bismarck, North Dakota 58503-5512 or brkadrmas@nd.gov. Further draft permit information may be obtained from Steve Fried, and further hearing information may be obtained from Bethany Kadrmas, both at the North Dakota Oil and Gas Division, 1016 East Calgary Avenue, Bismarck, North Dakota 58503-5512, 701-328-8020. Minnkota Power Cooperative, Inc., 5301 32nd Avenue South, Grand Forks, ND 58201.

Case No. 29033

Application of Minnkota Power Cooperative, Inc. to consider the amalgamation of the storage reservoir pore space, in which the Commission may require that the pore space owned by nonconsenting owners be included in the geologic storage facility and subject to geologic storage, as required to operate the Minnkota Power Cooperative, Inc. storage facility located in Sections 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 17, 18, 19, 20, 21, Township 141 North, Range 83 West, Sections 1, 2, 12, 13, Township 141 North, Range 84 West, Sections 19, 20, 21, 22, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, Township 142 North, Range 83 West, Sections 35, 36, Township 142 North, Range 84 West, Oliver County, North Dakota, in the Deadwood Formation, pursuant to North Dakota Century Code Section 38-22-10.

Case No. 29034

Application of Minnkota Power Cooperative, Inc. for an order of the Commission determining the amount of financial responsibility for the geologic storage of carbon dioxide from the Milton R. Young Station in the storage facility located in Sections 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 17, 18, 19, 20, 21, Township 141 North, Range 83 West, Sections 1, 2, 12, 13, Township 141 North, Range 84 West, Sections 19, 20, 21, 22, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, Township 142 North, Range 83 West, Sections 35, 36, Township 142 North, Range 84 West, Oliver County, North Dakota, in the Deadwood Formation, pursuant to North Dakota Administrative Code Section 43-05-01-09.1.

November 2, 2021

INDUSTRIAL COMMISSION
STATE OF NORTH DAKOTA

Minnkota Power Cooperative, Inc.
Tundra – Deadwood Formation
Exhibit 2 – PART I

DATE 11/2/21 CASE NO 29032-34
Introduced By Minnkota
Exhibit 2
Identified By Minnkota

**STORAGE AGREEMENT
TUNDRA DEADWOOD – SECURE GEOLOGIC STORAGE
OLIVER COUNTY, NORTH DAKOTA**

**STORAGE AGREEMENT
TUNDRA DEADWOOD – SECURE GEOLOGIC STORAGE
OLIVER COUNTY, NORTH DAKOTA**

THIS AGREEMENT (“Agreement”) is entered into as of the 1st day of November 1, 2021, by the parties who have signed the original of this instrument, a counterpart thereof, ratification and joinder or other instrument agreeing to become a Party hereto.

RECITALS:

A. It is in the public interest to promote the geologic storage of carbon dioxide in a manner which will benefit the state and the global environment by reducing greenhouse gas emissions and in a manner which will help ensure the viability of the state's coal and power industries, to the economic benefit of North Dakota and its citizens;

B. To further geologic storage of carbon dioxide, a potentially valuable commodity, may allow for its ready availability if needed for commercial, industrial, or other uses, including enhanced recovery of oil, gas, and other minerals; and

C. For geologic storage, however, to be practical and effective requires cooperative use of surface and subsurface property interests and the collaboration of property owners, which may require procedures that promote, in a manner fair to all interests, cooperative management, thereby ensuring the maximum use of natural resources.

AGREEMENT:

It is agreed as follows:

**ARTICLE 1
DEFINITIONS**

As used in this Agreement:

1.1 **Carbon Dioxide** means carbon dioxide in gaseous, liquid, or supercritical fluid state together with incidental associated substances derived from the source materials, capture process and any substances added or used to enable or improve the injection process.

1.2 **Commission** means the North Dakota Industrial Commission.

1.3 **Effective Date** is the time and date this Agreement becomes effective as provided in Article 14.

1.4 **Facility Area** is the land described by Tracts in Exhibit “B” and shown on Exhibit “A” containing 18903.211 acres, more or less.

1.5 **Party** is any individual, corporation, limited liability company, partnership, association, receiver, trustee, curator, executor, administrator, guardian, tutor, fiduciary, or other representative of any kind, any department, agency, or instrumentality of the state, or any governmental subdivision thereof, or any other entity capable of holding an interest in the Storage Reservoir.

1.6 **Pore Space** means a cavity or void, whether natural or artificially created, in any subsurface stratum.

1.7 **Pore Space Interest** is a right to or interest in the Pore Space in any Tract within the boundaries of the Facility Area.

1.8 **Pore Space Owner** is a Party hereto who owns Pore Space Interest.

1.9 **Storage Equipment** is any personal property, lease and well equipment, plants and other facilities and equipment for use in Storage Operations.

1.10 **Storage Expense** is all costs, expense or indebtedness incurred by the Storage Operator pursuant to this Agreement for or on account of Storage Operations.

1.11 **Storage Reservoir** consists of the Pore Space and confining subsurface strata underlying the Facility Area described as the Opeche-Picard (Upper Confining Zone), Broom Creek (Storage Reservoir/Injection Zone), and Amsden (Lower Confining Zone) Formation(s) and which are defined as identified by the well logging suite performed at two stratigraphic wells, the J-LOC1 well (File No. 37380) and the J-ROC1 1 well (File No. 37672). The log suites included caliper, gamma ray (GR), density, porosity (neutron, density), dipole sonic, resistivity, spectral GR, a combinable magnetic resonance (CMR), and fracture finder log. Further, the logs were used to pick formation top depths and interpret lithology, petrophysical properties, and time-to-depth shifting of seismic data obtained from two 3D seismic surveys covering an area totaling 18.5 miles in and around the J-ROC1 1 (located in Section 4, Township 141 North, Range 83 West) and the J-LOC 1 (located in Section 27, Township 142 North, Range 84 West) stratigraphic wells located in Oliver County, North Dakota. Formation top depths were picked from the top of the Pierre Formation to the top of the Precambrian. These logs and data which encompass the stratigraphic interval from an average depth of 4,650 feet to an average depth of 5,450 feet within the limits of the Facility Area.

1.12 **Storage Facility** is the unitized or amalgamated Storage Reservoir created pursuant to an order of the Commission.

1.13 **Storage Facility Participation** is the percentage shown on Exhibit "C" for allocating payments for use of the Pore Space under each Tract identified in Exhibit "B".

1.14 **Storage Operations** are all operations conducted by the Storage Operator pursuant to this Agreement or otherwise authorized by any lease covering any Pore Space Interest.

1.15 **Storage Operator** is the person or entity named in Section 4.1 of this Agreement.

1.16 **Storage Rights** are the rights to explore, develop, and operate lands within the Facility Area for the storage of Storage Substances.

1.17 **Storage Substances** are Carbon Dioxide and incidental associated substances, fluids, and minerals.

1.18 **Tract** is the land described as such and given a Tract number in Exhibit “B.”

ARTICLE 2 EXHIBITS

2.1 **Exhibits.** The following exhibits, which are attached hereto, are incorporated herein by reference:

2.1.1 Exhibit “A” is a map that shows the boundary lines of the Tundra Deadwood Facility Area and the tracts therein;

2.1.2 Exhibit “B” is a schedule that describes the acres of each Tract in the Tundra Deadwood Facility Area;

2.1.3 Exhibit “C” is a schedule that shows the Storage Facility Participation of each Tract; and

2.1.4 Exhibit “D” is a form of Surface Use and Pore Space Lease.

2.2 **Reference to Exhibits.** When reference is made to an exhibit, it is to the exhibit as originally attached or, if revised, to the last revision.

2.3 **Exhibits Considered Correct.** Exhibits “A,” “B,” “C” and “D” shall be considered to be correct until revised as herein provided.

2.4 **Correcting Errors.** The shapes and descriptions of the respective Tracts have been established by using the best information available. If it subsequently appears that any Tract, mechanical miscalculation or clerical error has been made, Storage Operator, with the approval of Pore Space Owners whose interest is affected, shall correct the mistake by revising the exhibits to conform to the facts. The revision shall not include any re-evaluation of engineering or geological interpretations used in determining Storage Facility Participation. Each such revision of an exhibit made prior to thirty (30) days after the Effective Date shall be effective as of the Effective Date. Each such revision thereafter made shall be effective at 7:00 a.m. on the first day of the calendar month next following the filing for record of the revised exhibit or on such other date as may be determined by Storage Operator and set forth in the revised exhibit.

2.5 **Filing Revised Exhibits.** If an exhibit is revised, Storage Operator shall execute an appropriate instrument with the revised exhibit attached and file the same for record in the county or counties in which this Agreement or memorandum of the same is recorded and shall also file the amended changes with the Commission.

ARTICLE 3
CREATION AND EFFECT OF STORAGE FACILITY

3.1 **Unleased Pore Space Interests.** Any Pore Space Owner in the Storage Facility who owns a Pore Space Interest in the Storage Reservoir that is not leased for the purposes of this Agreement and during the term hereof, shall be treated as if it were subject to the Surface Use and Pore Space Lease attached hereto as Exhibit “D”.

3.2 **Amalgamation of Pore Space.** All Pore Space Interests in and to the Tracts are hereby amalgamated and combined insofar as the respective Pore Space Interests pertain to the Storage Reservoir, so that Storage Operations may be conducted with respect to said Storage Reservoir as if all of the Pore Space Interests in the Facility Area had been included in a single lease executed by all Pore Space Owners, as lessors, in favor of Storage Operator, as lessee and as if the lease contained all of the provisions of this Agreement.

3.3 **Amendment of Leases and Other Agreements.** The provisions of the various leases, agreements, or other instruments pertaining to the respective Tracts or the storage of the Storage Substances therein, including the Surface Use and Pore Space Lease attached hereto as Exhibit “D”, are amended to the extent necessary to make them conform to the provisions of this Agreement, but otherwise shall remain in effect.

3.4 **Continuation of Leases and Term Interests.** Injection in to any part of the Storage Reservoir, or other Storage Operations, shall be considered as injection in to or upon each Tract within said Storage Reservoir, and such injection or operations shall continue in effect as to each lease as to all lands and formations covered thereby just as if such operations were conducted on and as if a well were injecting in each Tract within said Storage Reservoir.

3.5 **Titles Unaffected by Storage.** Nothing herein shall be construed to result in the transfer of title of the Pore Space Interest of any Party hereto to any other Party or to Storage Operator.

3.6 **Injection Rights.** Storage Operator is hereby granted the right to inject into the Storage Reservoir any Storage Substances in whatever amounts Storage Operator may deem expedient for Storage Operations, together with the right to drill, use, and maintain injection wells in the Facility Area, and to use for injection purposes.

3.7 **Transfer of Storage Substances from Storage Facility.** Storage Operator may transfer from the Storage Facility any Storage Substances, in whatever amounts Storage Operator may deem expedient for Storage Operations, to any other reservoir, subsurface stratum or formation permitted by the Commission for the storage of carbon dioxide under Chapter 38-22 of the North Dakota Century Code. The transfer of such Storage Substances out of the Storage Facility shall be disregarded for the purposes of calculating the royalty under any lease covering a Pore Space Interest (including Exhibit “D”) and shall not affect the allocation of Storage Substances injected into the Storage Facility through the surface of the Facility Area in accordance with Article 6 of this Agreement.

3.8 **Receipt of Storage Substances.** Storage Operator may accept and receive into the Storage Facility any Storage Substances, in whatever amounts Storage Operator may deem expedient for Storage Operations, being stored in any other reservoir, subsurface stratum or formation permitted by the Commission for the storage of carbon dioxide under Chapter 38-22 of the North Dakota Century Code. The receipt of such Storage Substances into the Storage Facility shall be disregarded for the purposes of calculating the royalty under any lease covering a Pore Space Interest (including Exhibit “D”) and shall not affect the allocation of Storage Substances injected into the Storage Facility through the surface of the Facility Area in accordance with Article 6 of this Agreement.

3.9 **Cooperative Agreements.** Storage Operator may enter into cooperative agreements with respect to lands adjacent to the Facility Area for the purpose of coordinating Storage Operations. Such cooperative agreements may include, but shall not be limited to, agreements regarding the transfer and receipt of Storage Substances pursuant to Sections 3.7 and 3.8 of this Agreement.

3.10 **Border Agreements.** Storage Operator may enter into an agreement or agreements with owners of adjacent lands with respect to operations which may enhance the injection of the Storage Substances in the Storage Reservoir in the Facility Area or which may otherwise be necessary for the conduct of Storage Operations.

ARTICLE 4 STORAGE OPERATIONS

4.1 **Storage Operator.** Minnkota Power Cooperative, Inc. is hereby designated as the initial Storage Operator. Storage Operator shall have the exclusive right to conduct Storage Operations, which shall conform to the provisions of this Agreement and any lease covering a Pore Space Interest. If there is any conflict between such agreements, this Agreement shall govern.

4.2 **Successor Operators.** The initial Storage Operator and any subsequent operator may, at any time, transfer operatorship of the Storage Facility with and upon the approval of the Commission.

4.3 **Method of Operation.** Storage Operator shall engage in Storage Operations with diligence and in accordance with good engineering and injection practices.

4.4 **Change of Method of Operation.** As permitted by the Commission nothing herein shall prevent Storage Operator from discontinuing or changing in whole or in part any method of operation which, in its opinion, is no longer in accord with good engineering or injection practices. Other methods of operation may be conducted or changes may be made by Storage Operator from time to time if determined by it to be feasible, necessary or desirable to increase the injection or storage of Storage Substances.

**ARTICLE 5
TRACT PARTICIPATIONS**

5.1 **Tract Participations.** The Storage Facility Participation of each Tract is shown in Exhibit "C." The Storage Facility Participation of each Tract shall be based 100% upon the ratio of surface acres in each Tract to the total surface acres for all Tracts within the Facility Area.

5.2 **Relative Storage Facility Participations.** If the Facility Area is enlarged or reduced, the revised Storage Facility Participation of the Tracts remaining in the Facility Area and which were within the Facility Area prior to the enlargement or reduction shall remain in the same ratio to one another.

**ARTICLE 6
ALLOCATION OF STORAGE SUBSTANCES**

6.1 **Allocation of Tracts.** All Storage Substances injected shall be allocated to the several Tracts in accordance with the respective Storage Facility Participation effective during the period that the Storage Substances are injected. The amount of Storage Substances allocated to each tract, regardless of whether the amount is more or less than the actual injection of Storage Substances from the well or wells, if any, on such Tract, shall be deemed for all purposes to have been injected into such Tract. Storage Substances transferred or received pursuant to Sections 3.7 and 3.8 of this Agreement shall be disregarded for the purposes of this Section 6.1.

6.2 **Distribution within Tracts.** The Storage Substances injected and allocated to each Tract shall be distributed among, or accounted for to, the Pore Space Owners who own a Pore Space Interest in such Tract in accordance with the Pore Space Owners' Storage Facility Participation effective during the period that the Storage Substances were injected. If any Pore Space Interest in a Tract hereafter becomes divided and owned in severalty as to different parts of the Tract, the owners of the divided interests, in the absence of an agreement providing for a different division, shall be compensated for the storage of the Storage Substances in proportion to the surface acreage of their respective parts of the Tract. Storage Substances transferred or received pursuant to Sections 3.7 and 3.8 of this Agreement shall be disregarded for the purposes of this Section 6.2.

**ARTICLE 7
TITLES**

7.1 **Warranty and Indemnity.** Each Pore Space Owner who, by acceptance of revenue for the injection of Storage Substances into the Storage Reservoir, shall be deemed to have warranted title to its Pore Space Interest, and, upon receipt of the proceeds thereof to the credit of such interest, shall indemnify and hold harmless the Storage Operator and other Parties from any loss due to failure, in whole or in part, of its title to any such interest.

7.2 **Injection When Title Is in Dispute.** If the title or right of any Pore Space Owner claiming the right to receive all or any portion of the proceeds for the storage of any Storage Substances allocated to a Tract is in dispute, Storage Operator shall require that the Pore Space Owner to whom the proceeds thereof are paid furnish security for the proper accounting thereof to the rightful Pore Space Owner if the title or right of such Pore Space Owner fails in whole or in part.

7.3 **Payments of Taxes to Protect Title.** The owner of surface rights to lands within the Facility Area is responsible for the payment of any *ad valorem* taxes on all such rights, interests or property, unless such owner and the Storage Operator otherwise agree. If any *ad valorem* taxes are not paid by or for such owner when due, Storage Operator may at any time prior to tax sale or expiration of period of redemption after tax sale, pay the tax, redeem such rights, interests or property, and discharge the tax lien. Storage Operator shall, if possible, withhold from any proceeds derived from the storage of Storage Substances otherwise due any Pore Space Owner who is a delinquent taxpayer an amount sufficient to defray the costs of such payment or redemption, such withholding to be credited to the Storage Operator. Such withholding shall be without prejudice to any other remedy available to Storage Operator.

7.4 **Pore Space Interest Titles.** If title to a Pore Space Interest fails, but the tract to which it relates is not removed from the Facility Area, the Party whose title failed shall not be entitled to share under this Agreement with respect to that interest.

ARTICLE 8 EASEMENTS OR USE OF SURFACE

8.1 **Grant of Easement.** Storage Operator shall have the right to use as much of the surface of the land within the Facility Area as may be reasonably necessary for Storage Operations and the injection of Storage Substances.

8.2 **Use of Water.** Storage Operator shall have and is hereby granted free use of water from the Facility Area for Storage Operations, except water from any well, lake, pond or irrigation ditch of a Pore Space Owner; notwithstanding the foregoing, Storage Operator may access any well, lake, or pond as provided in Exhibit "D".

8.3 **Surface Damages.** Storage Owner shall pay surface owners for damage to growing crops, timber, fences, improvements and structures located on the Facility Area that result from Storage Operations.

8.4 **Surface and Sub-Surface Operating Rights.** Except to the extent modified in this Agreement, Storage Operator shall have the same rights to use the surface and sub-surface and use of water and any other rights granted to Storage Operator in any lease covering Pore Space Interests. Except to the extent expanded by this Agreement or the extent that such rights are common to the effected leases, the rights granted by a lease may be exercised only on the land covered by that lease. Storage Operator will to the extent possible minimize surface impacts.

ARTICLE 9 ENLARGEMENT OF STORAGE FACILITY

9.1 **Enlargement of Storage Facility.** The Storage Facility may be enlarged from time to time to include acreage and formations reasonably proven to be geologically capable of storing Storage Substances. Any expansion must be approved in accordance with the rules and regulations of the Commission.

9.2 **Determination of Tract Participation.** Storage Operator, subject to Section 5.2, shall determine the Storage Facility Participation of each Tract within the Storage Facility as enlarged, and shall revise Exhibits “A”, “B” and “C” accordingly and in accordance with the rules, regulations and orders of the Commission.

9.3 **Effective Date.** The effective date of any enlargement of the Storage Facility shall be effective as determined by the Commission.

ARTICLE 10 TRANSFER OF TITLE PARTITION

10.1 **Transfer of Title.** Any conveyance of all or part of any interest owned by any Party hereto with respect to any Tract shall be made expressly subject to this Agreement. No change of title shall be binding upon Storage Operator, or any Party hereto other than the Party so transferring, until 7:00 a.m. on the first day of the calendar month following thirty (30) days from the date of receipt by Storage Operator of a photocopy, or a certified copy, of the recorded or filed instrument evidencing such a change in ownership.

10.2 **Waiver of Rights to Partition.** Each Party hereto agrees that, during the existence of this Agreement, it will not resort to any action to partition any Tract or parcel within the Facility Area or the facilities used in the development or operation thereof, and to that extent waives the benefits or laws authorizing such partition.

ARTICLE 11 RELATIONSHIP OF PARTIES

11.1 **No Partnership.** The duties, obligations and liabilities arising hereunder shall be several and not joint or collective. This Agreement is not intended to create, and shall not be construed to create, an association or trust, or to impose a partnership duty, obligation or liability with regard to any one or more of the Parties hereto. Each Party hereto shall be individually responsible for its own obligations as herein provided.

11.2 **No Joint Marketing.** This Agreement is not intended to provide, and shall not be construed to provide, directly or indirectly, for any joint marketing of Storage Substances.

11.3 **Pore Space Owners Free of Costs.** This Agreement is not intended to impose, and shall not be construed to impose, upon any Pore Space Owner any obligation to pay any Storage Expense unless such Pore Space Owner is otherwise so obligated.

11.4 **Information to Pore Space Owners.** Each Pore Space Owner shall be entitled to all information in possession of Storage Operator to which such Pore Space Owner is entitled by an existing lease or a lease imposed by this Agreement.

17	Section 2-T141N-R84W	City of Center Park District	46.050	10.68544645%	0.24360942%
		Barry A. Berger and Carrie Berger	286.460	66.47020605%	1.51540400%
		Dwight Wrangham and Linda Wrangham	3.000	0.69612029%	0.01587032%
		BNI Coal, Ltd.	95.450	22.14822721%	0.50494070%
		Tract Total:	430.960	100.00000000%	

18	Section 1-T141N-R84W	Jolene Berger	627.320	97.93917442%	3.31858981%
		Travis Klatt and Jessica Klatt	8.310	1.29738338%	0.04396079%
		Gary Leinius	4.890	0.76344220%	0.02586862%
		Tract Total:	640.520	100.00000000%	
19	Section 6-T141N-R83W	Brian Reinke	19.577	3.02274377%	0.10356336%
		Benjamin Reinke	30.997	4.78601096%	0.16397532%
		Elizabeth Wagendorf	30.997	4.78601096%	0.16397532%
		Jolene Berger	245.840	37.95877403%	1.30051986%
		Gary Leinius	320.240	49.44646028%	1.69410381%
		Tract Total:	647.650	100.00000000%	
20	Section 5-T141N-R83W	Minnkota Power Cooperative, Inc.	641.12000000	99.92518703%	3.39159328%
		Square Butte Electric Cooperative	0.48000000	0.07481297%	0.00253925%
		Tract Total:	641.600	100.00000000%	
21	Section 4-T141N-R83W	Square Butte Electric Cooperative	3.820	0.59499704%	0.02020821%
		Minnkota Power Cooperative, Inc.	638.200	99.40500296%	3.37614617%
		Tract Total:	642.020	100.00000000%	
22	Section 3-T141N-R83W	Minnkota Power Cooperative, Inc.	7.720	1.20256714%	0.04083962%
		Alan Schwalbe	634.240	98.79743286%	3.35519734%
		Tract Total:	641.960	100.00000000%	
23	Section 2-T141N-R83W	Carl Schwalbe	321.520	50.00000000%	1.70087514%
		Rolland Schwalbe	321.520	50.00000000%	1.70087514%
		Tract Total:	643.040	100.00000000%	
24	Section 1-T141N-R83W	Carl Schwalbe	40.000	50.00000000%	0.21160427%

		Rolland Schwalbe	40.000	50.00000000%	0.21160427%
		Tract Total:	80.000	100.00000000%	
25	Section 12-T141N-R83W	Richard A. Schwalbe and Lila M. Schwalbe	160.000	100.00000000%	0.84641709%
		Tract Total:	160.000	100.00000000%	

26	Section 11-T141N-R83W	Alan Schwalbe	480.000	80.00000000%	2.53925127%
		Julie Hatzenbihler	15.000	2.50000000%	0.07935160%
		Rodney J. Hatzenbihler	15.000	2.50000000%	0.07935160%
		Nancy Henke	15.000	2.50000000%	0.07935160%
		Bonnie Schwab	15.000	2.50000000%	0.07935160%
		Peggy Gobar	15.000	2.50000000%	0.07935160%
		Annette Hatzenbihler	15.000	2.50000000%	0.07935160%
		Brent Hatzenbihler	15.000	2.50000000%	0.07935160%
		Randy Hatzenbihler	15.000	2.50000000%	0.07935160%
		Tract Total:	600.000	100.00000000%	
27	Section 10-T141N-R83W	Alan Schwalbe	237.840	37.16250000%	1.25819900%
		Minnkota Power Cooperative, Inc.	2.160	0.33750000%	0.01142663%
		Delmar Hagerott	400.000	62.50000000%	2.11604273%
		Tract Total:	640.000	100.00000000%	
28	Section 9-T141N-R83W	Minnkota Power Cooperative, Inc.	640.000	100.00000000%	3.38566836%
		Tract Total:	640.000	100.00000000%	
29	Section 8-T141N-R83W	BNI Coal, Ltd.	161.000	25.15625000%	0.85170720%
		Minnkota Power Cooperative, Inc.	160.000	25.00000000%	0.84641709%
		Five D's, LLP	319.000	49.84375000%	1.68754407%
		Tract Total:	640.000	100.00000000%	
30	Section 7-T141N-R83W	Janet K. Dohrmann and L. J. Dohrmann, Trustees of the Janet and L. J. Dohrmann Revocable Trust	328.460	50.65231471%	1.73758848%
		Gary Leinius	320.000	49.34768529%	1.69283418%
		Tract Total:	648.460	100.00000000%	
31	Section 12-T141N-R84W	Jolene Berger	160.00000000	25.00000000%	0.84641709%

Brian Dresser	320.00000000	50.00000000%	1.69283418%
Frances Fuchs	160.00000000	25.00000000%	0.84641709%
Tract Total:	640.000	100.00000000%	

32	Section 13-T141N-R84W	BNI Coal, Ltd.	280.000	100.00000000%	1.48122991%
		Tract Total:	280.000	100.00000000%	
33	Section 18-T141N-R83W	Dohrmann, as Trustees of The Janet and L.J. Dohrmann Revocable Trust	123.820	19.12100809%	0.65502103%
		Wayne Reuther	33.957	5.24378693%	0.17963439%
		Kent Reuther	33.957	5.24378693%	0.17963439%
		Keith Reuther	33.957	5.24378693%	0.17963439%
		Karen Shulz	33.957	5.24378693%	0.17963439%
		Jerald Reuther	33.957	5.24378693%	0.17963439%
		Martha Reuther	33.957	5.24378693%	0.17963439%
		Larry F. Schmidt and Virginia Schmidt	318.000	49.10741862%	1.68225397%
		BNI Coal, Ltd.	2.000	0.30885169%	0.01058021%
		Tract Total:	647.560	100.00000000%	
34	Section 17-T141N-R83W	Five D's LLP	320.000	50.00000000%	1.69283418%
		Jerald O. Reuther	79.698	12.45286458%	0.42161270%
		Wayne A. Reuther	53.333	8.33333333%	0.28213903%
		Karen L. Reuther	26.667	4.16666667%	0.14106952%
		Jeanette M. Reuther	0.302	0.04713542%	0.00159585%
		Larry F. Schmidt and Virginia Schmidt	160.000	25.00000000%	0.84641709%
		Tract Total:	640.000	100.00000000%	
35	Section 16-T141N-R83W	Larry F. Schmidt and Virginia Schmidt	160.000	25.00000000%	0.84641709%
		BNI Coal, Ltd.	160.000	25.00000000%	0.84641709%
		State of North Dakota - Dept. of Trust Lands Attn: Commissioner of University and School Lands	320.000	50.00000000%	1.69283418%
		Tract Total:	640.000	100.00000000%	
36	Section 15-T141N-R83W	Delmar Hagerott	240.000	100.00000000%	1.26962564%

		Tract Total:	240.000	100.00000000%	
37	Section 14-T141N-R83W	Alan Schwalbe	190.000	100.00000000%	1.00512029%
		Tract Total:	190.000	100.00000000%	

38	Section 21-T141N-R83W	Douglas D. Doll and Deberra K. Doll	100.000	22.72727273%	0.52901068%
		James D. Pazdernik and Bonita Pazdernik	100.000	22.72727273%	0.52901068%
		Doll Farm Enterprises	160.000	36.36363636%	0.84641709%
		Delmar Hagerott	80.000	18.18181818%	0.42320855%
		Tract Total:	440.000	100.00000000%	
39	Section 20-T141N-R83W	Douglas D. Doll and Deberra K. Doll	80.000	25.00000000%	0.42320855%
		James D. Pazdernik and Bonita Pazdernik	80.000	25.00000000%	0.42320855%
		Dale P. Pfliger and Judy Pfliger	80.000	25.00000000%	0.42320855%
		Thomas Pfliger	80.000	25.00000000%	0.42320855%
		Tract Total:	320.000	100.00000000%	
40	Section 19-T141N-R83W	Winfrid Keller	120.000	49.59497438%	0.63481282%
		Jerald Reuther	23.684	9.78839478%	0.12529089%
		Wayne Reuther	23.684	9.78839478%	0.12529089%
		Kent Reuther	23.684	9.78839478%	0.12529089%
		Keith Reuther	27.224	11.25144652%	0.14401787%
		Karen Schulz	23.684	9.78839478%	0.12529089%
		Tract Total:	241.960	100.00000000%	
		Total Acres:	18903.210	Total Participation:	100.00000000%

EXHIBIT C

Tract Participation Factors

Attached to and made part of the Storage Agreement
Tundra Deadwood - Secure Geological Storage
Oliver County, North Dakota

<u>Tract No.</u>	<u>Acres</u>	<u>Tract Participation Factor</u>
1	160.000	0.84641709%
2	480.000	2.53925127%
3	240.000	1.26962564%
4	40.000	0.21160427%
5	440.000	2.32764700%
6	640.000	3.38566836%
7	640.000	3.38566836%
8	560.000	2.96245982%
9	200.000	1.05802136%
10	560.000	2.96245982%
11	640.000	3.38566836%
12	640.000	3.38566836%
13	640.000	3.38566836%
14	647.480	3.42523836%
15	320.000	1.69283418%
16	80.000	0.42320855%
17	430.960	2.27982443%
18	640.520	3.38841922%
19	647.650	3.42613768%
20	641.600	3.39413253%
21	642.020	3.39635438%
22	641.960	3.39603697%
23	643.040	3.40175028%
24	80.000	0.42320855%
25	160.000	0.84641709%
26	600.000	3.17406409%
27	640.000	3.38566836%
28	640.000	3.38566836%
29	640.000	3.38566836%
30	648.460	3.43042266%
31	640.000	3.38566836%
32	280.000	1.48122991%
33	647.560	3.42566157%
34	640.000	3.38566836%
35	640.000	3.38566836%
36	240.000	1.26962564%
37	190.000	1.00512029%
38	440.000	2.32764700%
39	320.000	1.69283418%
40	241.960	1.27999424%
Total:	18903.210	100.00000000%

EXHIBIT D

Surface Use And Pore Space Lease
Attached to and made part of the Storage Agreement
Tundra Deadwood
Oliver County, North Dakota

SURFACE USE AND PORE SPACE LEASE

THIS SURFACE USE AND PORE SPACE LEASE (“**Lease**”) is made, entered into, and effective as of the _____ day of _____, 2020 (“**Effective Date**”) by and between _____, whose address is _____ (whether one or more, “**Lessor**”), and Minnkota Power Cooperative, Inc., a Minnesota cooperative association, whose address is _____ (whether one or more, “**Lessee**”). Lessor and Lessee are sometimes referred to in this Lease individually as a “**Party**” and collectively as the “**Parties.**”

1. DEFINITIONS. The following terms shall have the following meanings in this Lease:

“**Carbon Dioxide**” means carbon dioxide in gaseous, liquid, or supercritical fluid state together with incidental associated substances derived from the source materials, capture process and any substances added or used to enable or improve the injection process.

“**Commencement of Operations**” means the date on which Carbon Dioxide is first injected into a Reservoir for commercial operations under this Lease, provided that the performance of test injections and related activities shall not be deemed Commencement of Operations.

“**Commission**” means the North Dakota Industrial Commission.

“**Completion Notice**” means a certificate of project completion issued to Lessee by the Commission pursuant to Chapter 38-22 of the North Dakota Century Code.

“**Environmental Attributes**” means any and all credits, benefits, emissions reductions, offsets, and allowances, howsoever entitled, attributable to the Operations, including any avoided emissions and the reporting rights related to these avoided emissions, such as 26 U.S.C. §45Q Tax Credits.

“**Environmental Incentives**” means any and all credits, rebates, subsidies, payments or other incentives that relate to the use of technology incorporated into the Operations, environmental benefits of Operations, or other similar programs available from any regulated entity or any Governmental Authority.

“**Facilities**” means all facilities, structures, improvements, fixtures, equipment, and any other personal property at any time acquired or constructed by or for Lessee that are necessary or desirable in connection with any use of Reservoirs and their Formations or Operations, including without limitation wells, pipelines, roads, utilities, metering or monitoring equipment, and buildings.

“**Financing Parties**” means person or persons providing construction or permanent financing to Lessee in connection with construction, ownership, operation and maintenance of Facilities or Operations, including financial institutions, leasing companies, institutions, tax equity partners, joint venture partners and/or private lenders.

“**Formation**” means the geological formation of which any Reservoir is a part.

“**Hazardous Substance**” means any chemical, waste or other substances, expressly excluding Carbon Dioxide and Non-Native Carbon Dioxide, (a) which now or hereafter becomes defined as or included in the definition of “hazardous substances,” “hazardous wastes,” “hazardous materials,” “extremely hazardous wastes,” “restricted hazardous wastes,” “toxic substances,” “toxic pollutants,” “pollutions,” “pollutants,” “regulated substances,” or words of similar import under any law

pertaining to environment, health, safety or welfare, (b) which is declared to be hazardous, toxic or polluting by any Governmental Authority, (c) exposure to which now or hereafter prohibited, limited or regulated by any Governmental Authority, (d) the storage, use, handling, disposal or release of which is restricted or regulated by any Governmental Authority, or (e) for which remediation or cleanup is required by any Governmental Authority.

“Leased Premises” means the surface and subsurface of the land, excluding mineral rights, described in Exhibit A of this Lease.

“Native Oil and Gas” means all oil, natural gas, and other hydrocarbons present in and under the Leased Premises and not injected by Lessor, Lessee or any third party.

“Non-Native Carbon Dioxide” means Carbon Dioxide that is not naturally occurring in the Reservoir together with incidental associated substances, fluids, minerals, oil, and gas, excluding that which, independent of Operations, originates from an accumulation meeting the definition of a Pool. All Non-Native Carbon Dioxide will be considered personal property of the Lessee and its successor and assigns under this Agreement.

“Operating Year” means the calendar year or portion of the calendar year following Commencement of Operations during which Operations occur.

“Operations” means the transportation and injection of Carbon Dioxide into a Reservoir after Commencement of Operations, and any withdrawal of this Carbon Dioxide, as well as the withdrawal of Non-Native Carbon Dioxide, for sale or disposal in accordance with applicable law.

“Option Money” means 20 percent of the Initial Term Payment (as such term is defined in that certain Option to Lease between Lessor and Lessee with respect to the Leased Premises).

“Pool” means an underground Reservoir containing a common accumulation of Native Oil and Gas that is economically recoverable. A zone of a structure that is completely separated from any other zone in the same structure is a Pool.

“Pore Space” means a cavity or void, whether natural or artificially created, in a Reservoir.

“Related Person” means any member, partner, principal, officer, director, shareholder, predecessor-in-interest, successor-in-interest, employee, agent, heir, representative, contractor, lessee, sublessee, licensee, invitee, permittee of a Party, Financing Parties or any other person or entity that has obtained or in future obtains rights or interests from, under or through a Party (excluding the other Party itself).

“Reservoir” means any subsurface stratum, sand, formation, aquifer, cavity or void, whether natural or artificially created, wholly or partially within the Leased Premises, suitable for the storage or sequestration of carbon dioxide or other gaseous substances.

“Storage Fee” means Lessor’s proportionate share of sixteen cents (\$0.16) per metric ton of Carbon Dioxide (“Storage Rate”) as determined by the Lessee’s last meter before injection as part of Operations. For injection periods after 2026, the Storage Rate shall be adjusted to an amount equal to the product of sixteen cents (\$0.16) and the inflation adjustment factor for such calendar year. The inflation adjustment factor shall be determined in the same manner as provided in 26 U.S.C. §45Q(f)(7)(B), substituting “2026” for “2008”. The Storage Fee shall be: (i) calculated separately for each amalgamated area as created and established by the Commission that includes any portion of the Leased Premises; (ii) limited to the Carbon Dioxide injected in said amalgamated area in the immediately preceding Operating Year; and (iii) based on the Lessor’s proportionate per net acre share of said unit. For avoidance of doubt, the Lessor shall receive a separate Storage Fee for each amalgamated area created and established by the Commission that includes any portion of the Leased Premises on a net acre basis within the Lessor’s interest being the numerator and the acres in the amalgamated area being the denominator.

“Tax Credits” means any and all (a) investment tax credits, (b) production tax credits, (c)

credits under 26 U.S.C. §45Q credits, and (d) similar tax credits or grants under federal, state or local law relating to construction, ownership or Operations

2. LEASE RIGHTS. In consideration of the compensation, covenants, agreements, and conditions set forth in this Lease, Lessor grants, demises, leases and lets to Lessee the exclusive right to use all Pore Space, Reservoirs and their Formations in the Leased Premises for any purpose not previously granted or reserved by an instrument of record related to the capture, injection, storage, sequestration, sale, withdrawal or disposal of Carbon Dioxide, Non-Native Carbon Dioxide and incidental associated substances, fluids, and minerals, provided that Lessee shall have no right to use potable water from within the Leased Premises in Operations; together with the following exclusive rights:

(a) to use the Leased Premises for developing, constructing, installing, improving, maintaining, replacing, repowering, relocating, removing, abandoning in place, expanding, and operating Facilities;

(b) to lay, maintain, replace, repair, and remove roads on the Leased Premises to allow Lessee, in its sole discretion, to exercise its rights under this Lease; and

(c) to enter upon and use the Leased Premises for the purposes of conducting:

(i) any investigations, studies, surveys, and tests, including without limitation drilling and installing test wells and monitoring wells, seismic testing, and other activities as Lessee deems necessary or desirable to determine the suitability of the Leased Premises for Operations,

(ii) any inspections and monitoring of Reservoirs and Carbon Dioxide as Lessee or any governmental authority deems necessary or desirable during the term of this Lease, and

(iii) any maintenance to the Facilities that Lessee or any governmental authority deems necessary or as required by applicable law.

Lessor also hereby grants and conveys unto Lessee all other and further easements across, over, under and above the Leased Premises as reasonably necessary to provide access to and services reasonably required for Lessee's performance under the Lease. The easements granted hereunder shall run with and burden the Leased Premises for the term of this Lease. Notwithstanding the surface easements granted herein, Lessee shall provide notice to Lessor prior to accessing the surface of the Property, and if such activity requires permit then prior notice shall be in form and not be less than that required by law or rule.

Lessee may exercise its rights under this Lease in conjunction with related operations on other properties near the Leased Premises. Lessee shall have no obligation, express or implied, to begin, prosecute or continue storage operations in, upon or under the Leased Premises, or to store and/or sell or use all or any portion of the gaseous substances stored thereon. The timing, nature, manner and extent of Lessee's operations, if any, under this Lease shall be at the sole discretion of Lessee. All obligations of Lessee are expressed herein, and there shall be no covenants implied under this Lease, it being agreed that all amounts paid hereunder constitute full and adequate consideration for this Lease.

3. INITIAL TERM. This Lease shall commence on the Effective Date and shall continue for an initial term of twenty (20) years ("Initial Term") unless sooner terminated in accordance with the terms of this Lease. Lessee may, but is not obligated to, extend the Initial Term for up to four successive five-year periods by paying Lessor \$25.00 per net acre in the Leased Premises per five-year extension on or prior to the last day of the Initial Term or expiring five-year extension period. The Initial Term together with any extensions are referred to as the "Primary Term."

4. OPERATIONAL TERM. Upon Commencement of Operations at any time during the Primary Term, this Lease shall continue for so long as any portion of the Leased Premises or

Lessee's Facilities are subject to a permit issued by the Commission or under the ownership or control of the State of North Dakota ("Operational Term"); *provided, however*, that all of Lessee's obligations under this Lease shall terminate upon issuance of a Completion Notice, except for payment of the Final Royalty Payment (as applicable), and Final Occupancy Fee (as applicable). If Commencement of Operations does not occur during the Primary Term, this Lease shall terminate, and Lessee shall execute a document evidencing termination of this Lease in recordable form and shall record it in the official records of the county in which the Leased Premises is located.

5. COMPENSATION.

(a) **Initial Term Payment.** Lessee shall pay to Lessor the greater of \$50.00 per net acre in the Leased Premises ("Initial Term Payment") or a one-time flat \$500.00 payment, the receipt and sufficiency of which are hereby acknowledged.

(b) **Royalty.** During the Operational Term, Lessee shall annually on or before May 31st pay to Lessor a royalty equal to the greater of a flat \$100.00 payment or the Storage Fee(s) for the immediately preceding Operating Year. For the Operating Year in which Lessee provides Lessor with a Completion Notice, Lessee shall pay a pro rata share of the Storage Fee(s) ("Final Royalty Payment"), as applicable, and said payment shall be made within sixty days after the date the Completion Notice was issued.

(c) **Occupancy Fee.** Within sixty days of the anniversary of the Effective Date after which any Facilities are installed or used, Lessee shall pay Lessor, as applicable, a one-time fee of (i) \$3,000.00 per net surface acre of the Leased Premises occupied by Facilities (excluding pipelines), and (ii) \$1.50 for each linear foot of pipeline in place on the Leased Premises. For the year in which Lessee provides Lessor with a Completion Notice, Lessee shall pay any fees owed pursuant to this provision ("Final Occupancy Fee") within sixty days after the date the Completion Notice was issued.

Lessor and Lessee agree that the Lease shall continue as specified herein even in the absence of Operations and the payment of royalties.

6. AMALGAMATION. (a) Lessee, in its sole discretion, shall have the right and power, at any time (including both before and after Commencement of Operations), to pool, unitize, or amalgamate any Reservoir or portion of a Reservoir with any other lands or interests into which that Reservoir extends and document such unit in accordance with applicable law or agency order. Amalgamated units shall be of such shape and dimensions as Lessee may elect and as are approved by the Commission. Amalgamated areas may include, but are not required to include, land upon which injection or extraction wells have been completed or upon which the injection and/or withdrawal of Carbon Dioxide and Non-Native Carbon Dioxide has commenced prior to the effective date of amalgamation. In exercising its amalgamation rights under this Lease and if required by law, Lessee shall record or cause to be recorded a copy of the Commission's amalgamation order or other notice thereof in the county in which the amalgamated unit. Amalgamating in one or more instances shall, if approved by the Commission, not exhaust the rights of Lessee to amalgamate Reservoirs or portions of Reservoirs into other amalgamation areas, and Lessee shall have the recurring right to revise any amalgamated area formed under this Lease by expansion or contraction or both. Lessee may dissolve any amalgamated area at any time and document such dissolution by recording an instrument in accordance with applicable law or agency order. Lessee shall have the right to negotiate, on behalf of and as agent for Lessor, any unit agreements and operating agreements with respect to the operation of any amalgamated areas formed under this Lease.

(b) The injection and/or withdrawal of Carbon Dioxide and Non-Native Carbon Dioxide into a Reservoir from any property within a amalgamated area that includes the Leased Premises shall be treated as if Operations were occurring on the Leased Premises, except that the royalty payable to Lessor under Section 5(b) of this Lease shall be Lessor's per net acre proportionate share of the total Storage Fee for the preceding Operating year's injection of Carbon Dioxide into the amalgamated area.

7. ENVIRONMENTAL INCENTIVES. Unless otherwise specified, Lessee is the owner of all

Environmental Attributes and Environmental Incentives and is entitled to the benefit of all Tax Credits or any other attributes of ownership of the Facilities and Operations. Lessor shall cooperate with Lessee in obtaining, securing and transferring all Environmental Attributes and Environmental Incentives and the benefit of all Tax Credits. Lessor shall not be obligated to incur any out-of-pocket costs or expenses in connection with such actions unless reimbursed by Lessee. If any Environmental Incentives are paid directly to Lessor, Lessor shall immediately pay such amounts over to Lessee.

8. SURRENDER OF LEASED PREMISES. Lessee shall have the unilateral right at any time and from time to time to execute and deliver to Lessor a written notice of surrender and/or release covering all or any part of the Leased Premises for which the subsurface pore space is not being utilized for storage as set forth herein, and upon delivery of such surrender and/or release to Lessor this Lease shall terminate as to such lands, and Lessee shall be released from all further obligations and duties as to the lands so surrendered and/or released, including, without limitation, any obligation to make payments provided for herein, except obligations accrued as of the date of the surrender and/or release.

9. FACILITIES.

- (a) Lessee shall in good faith consult with Lessor regarding the location of the Facilities, selection of the Facilities location shall be within the discretion of the Lessee with consent of the Lessor, not to be unreasonably withheld. The withholding of such consent by the Lessor regarding the location of the Facilities shall be deemed "unreasonable" if the proposed location of the Facility is located more than 500 feet from any occupied dwellings or currently used buildings existing on the Leased Premises as of the Effective Date. Notwithstanding the foregoing, in no event shall Facilities be located within 500 feet of any currently occupied dwelling or currently used building existing on the Leased Premises as of the Effective Date without Lessor's express consent. Lessee may erect fences around all or part of any aboveground Facilities (excluding roads) to separate Facilities from adjacent Lessor-controlled lands, and shall do so if Lessor so requests. Lessee shall maintain and repair at its expense any roads it constructs on the Leased Premises in reasonably safe and usable condition.
- (b) Lessor and Lessee agree that all Facilities and property of whatever kind and nature constructed, placed or affixed on the rights-of-way, easements, patented or leased lands as part of Lessee's Operations, as against all parties and persons whomsoever (including without limitation any party acquiring interest in the rights-of-way, easements, patented or leased lands or any interest in or lien, claim or encumbrance against any of such Facilities), shall be deemed to be and remain the property of the Lessee, and shall not be considered to be fixtures or a part of the Leased Premises. Lessor waives, to the fullest extent permitted by applicable law, any and all rights it may have under the laws of the State of North Dakota, arising under this Lease, by statute or otherwise to any lien upon, or any right to distress or attachment upon, or any other interest in, any item constituting the Facilities or any other equipment or improvements constructed or acquired by or for Lessee and located on the leased Premises or within any easement area. Each Lessor and Lessee agree that the Lessee (or the designated assignee of Lessee or Financing Parties) is the tax owner of any such Facilities, structures, improvements, equipment and property of whatever kind and nature and all tax filings and reports will be filed in a manner consistent with this Lease. Facilities shall at all times retain the legal status of personal property as defined under Article 9 of the Uniform Commercial Code. If there is any mortgage or fixture filing against the Premises which could reasonably be construed as prospectively attaching to the Facilities as a fixture of the Premises, Lessor shall provide a disclaimer or release from such lienholder. Lessor, as fee owner, consents to the filing of a disclaimer of the Facilities as a fixture of the Premises in the Oliver County Recorder's Office, or where real estate records of Oliver County are customarily filed.

10. SURFACE DAMAGE COMPENSATION ACT. The compensation contemplated and paid to Lessor hereunder is compensation for, among other things, damages sustained by Lessor for the lost use of and access to Lessor's land, pore space (to the extent required under North Dakota law), and any other damages which are contemplated under Ch. 38-11.1 of the North Dakota Century Code (to the extent applicable).

11. MINERALS, OIL AND GAS. This Lease is not intended to grant or convey, nor does it grant or convey, any right to or obligation for Lessee to explore for or produce minerals, including Native Oil and Gas, that may exist on the Leased Premises. Lessee shall not engage in any activity or permit its Related Persons to engage in any activity that unreasonably interferes with the Lessor's or third party's (or parties') rights to the granted, leased, or reserved mineral interests. If Lessor owns hydrocarbon mineral interests in the Leased Premises and Lessee should inadvertently discover a Pool in conjunction with its efforts to explore for and develop a Reservoir for Operations, Lessee shall inform Lessor within 60 days of discovery. If Lessee determines that it will not use in conjunction with Operations a well that has encountered a Pool within the Leased Premises, Lessor shall have the option but not the obligation to buy such well at cost, provided Lessor has the ability and assumes all permits and risks and liabilities which are associated with the ownership and operation of an oil, gas or mineral well.

12. FORCE MAJEURE. Should Lessee be prevented from complying with any express or implied covenant of this Lease, from utilizing the Leased Premises for underground storage purposes by reason of scarcity of or an inability to obtain or to use equipment or material failure or breakdown of equipment, or by operation of force majeure (including, but not limited to, riot, insurrection, war (declared or not), mobilization, explosion, labor dispute, fire, flood, earthquake, storm, lightning, tsunami, backwater caused by flood, vandalism, act of the public enemy, terrorism, epidemic, pandemic (including COVID-19), civil disturbances, strike, labor disturbances, work slowdown or stoppage, blockades, sabotage, labor or material shortage, national emergency, and the amendment, adoption or repeal of or other change in, or the interpretation or application of, any applicable laws, orders, rules or regulations of governmental authority), then while so prevented, Lessee's obligation to comply with such covenant shall be suspended and this Lease shall be extended while and so long as Lessee is prevented by any such cause from utilizing the property for underground storage purposes and the time while Lessee is so prevented shall not be counted against Lessee, anything in this Lease to the contrary notwithstanding.

13. DEFAULT/TERMINATION. Lessor may not terminate the Lease for any reason whatsoever unless a Default Event has occurred and is continuing consistent with the terms of this Section 13. Any Party that fails to perform its responsibilities as listed below shall be deemed to be the "Defaulting Party," the other Party shall be deemed to be the "Non-Defaulting Party," and each event of default shall be a "Default Event." A Default Event is: (a) failure of a Party to pay any amount due and payable under this Lease, other than an amount that is subject to a good faith dispute, within thirty (30) days following receipt of written notice from Non-Defaulting Party of such failure to pay; or (b) a material violation or default of any terms of this Lease by a Party, provided the Non-Defaulting Party provides written notice of violation or default and Defaulting Party fails to substantially cure the violation or default within sixty (60) days after receipt of said notice to cure such violations or defaults. Parties acknowledge that in connection with any construction or long-term financing or other credit support provided to Lessee or its affiliates by Financing Parties, that such Financing Parties may act to cure a continuing Default Event and Lessor agrees to accept performance from any such Financing Parties so long as such Financing Parties perform in accordance with the terms of this Lease. If Lessee, its affiliates or Financing Parties, fail to substantially cure such Default Event within the applicable cure period, Lessor may terminate the Lease. Lessee may terminate the lease with thirty (30) days written notice to Lessor. Upon termination of this Lease, Lessee shall have one hundred eighty (180) days to remove, plug, and/or abandon in place all Facilities of Lessee located on the Leased Premises in accordance with applicable permit requirements or other applicable statutes, rules or regulations.

14. ASSIGNMENT. (a) Lessor shall not sell, transfer, assign or encumber the Facilities or any part of Operations, Lessee's title or Lessee's rights under this Lease. (b) Lessee has the right to sell,

assign, mortgage, pledge, transfer, use as collateral, or otherwise collaterally assign or convey all or any of its rights under this Lease, including, without limitation, an assignment by Lessee to Financing Parties. (c) In the event Lessee assigns its rights under this Lease, Lessee shall be relieved of all obligations with respect to the assigned portion arising after the date of assignment so long as notice of such assignment is provided to Lessor, and provided that Lessee shall not be relieved from any obligation in respect of any payment or other obligations that have not been satisfied or performed prior to such date of assignment. (d) This Lease shall be binding on and inure to the benefit of the successors and assignees. The assigning Party shall provide written notice of any assignment within sixty (60) days after such assignment has become effective; provided, however, that an assigning Party's failure to deliver written notice of assignment within such 60-day period shall not be deemed a breach of this Lease unless such failure is willful and intentional. Further, no change or division in Lessor's ownership of or interest in the Leased Premises or royalties shall enlarge the obligations or diminish the rights of Lessee or be binding on Lessee until after Lessee has been furnished with a written assignment or a true copy of the assignment with evidence that same has been recorded with the Oliver County Recorder's Office.

15. FINANCING. (a) Lessor acknowledges that Lessee may obtain tax equity, construction, long-term financing and other credit support from one or more Financing Parties and that Lessee intends to enter into various agreements and execute various documents relating to such financing, which documents may, among other things, assign this Lease and any related easements to a Financing Party, grant a sublease in the Leased Premises and a lease of the Facilities from such Financing Party to Lessee, grant the Financing Parties a sublease or other real property interest in Lessee's interests in and to the Leased Premises, grant a first priority security interest in Lessee's interest in the Facilities and/or this Lease and Lessee's other interests in and to the Leased Premises, including, but not limited to, any easements, rights of way or similar interests (such documents, "Financing Documents"). Lessor acknowledges notice of the foregoing and consents to the foregoing actions and Financing Documents described above.

(b) Lessor agrees, to execute, and agrees to cause any and all of Lessor's lenders to execute, such commercially reasonable subordination agreements, non-disturbance agreements, forbearance agreements, consents, estoppels, modifications of this Lease and other acknowledgements of the foregoing as Lessee or the Financing Parties may reasonably request (collectively, "Lessor Financing Consent Instruments"). Lessor acknowledges and agrees that (i) Lessee's ability to obtain financing for the construction and operation of the Facilities is dependent upon the prompt cooperation of Lessor and its lenders as contemplated by this Section 15; (ii) if Lessee is unable to close on the financing for the Facilities, the construction of the Facilities and the Commencement of Operations will not likely occur; and (iii) it is in the best interest of both Lessee and Lessor for Lessee to obtain financing from the Financing Parties as contemplated by this Section 15. Therefore, Lessor agrees to act promptly, reasonably and in good faith in connection with any request for approval and execution of all Lessor Financing Consent Instruments. The Lessor shall also reasonably cooperate with the Lessee or the Financing Party in the making of any filings required by such requesting party for regulatory compliance or in accordance with applicable laws and in the operation and maintenance of the Facilities, all solely at the expense of the Lessee.

(c) As a precondition to exercising any rights or remedies as a result of any default or alleged default by Lessee under this Lease, Lessor shall deliver a duplicate copy of the applicable notice of default to each Financing Parties concurrently with delivery of such notice to Lessee, specifying in detail the alleged default and the required remedy, provided Lessor was given notice of such Financing Parties and if no such notice of default is required to be delivered to Lessee under this Lease, Lessor may not terminate this Lease unless Lessor has delivered a notice of default to each Financing Party specifying in detail the alleged default or breach and permitting each Financing Party the opportunity to cure as provided in this Section 15(c). Each Financing Party shall have the same period after receipt of a notice of default to remedy default, or cause the same to be remedied, as is given to Lessee after Lessee's receipt of a notice

of default under this Lease, plus, in each instance, the following additional time periods: (i) ten (10) Business Days in the event of any monetary default; and (ii) sixty (60) days in the event of any non-monetary default; provided, however, that (A) such sixty (60)-day period shall be extended for an additional sixty (60) days to enable such Financing Party to complete such cure, including the time required for such Financing Party to obtain possession of the Facilities (including possession by a receiver), institute foreclosure proceedings or otherwise perfect its right to effect such cure and (B) such Financing Party shall not be required to cure those defaults which are not reasonably susceptible of being cured or performed. Lessor shall accept such performance by or at the instance of a Financing Party as if the performance had been made by Lessee.

(d) If any Lessee Default Event cannot be cured without obtaining possession of all or part of the Facilities and/or the leasehold interest created by the Lease (the "Leasehold Estate"), then any such Lessee Default Event shall nonetheless be deemed remedied if: (i) within sixty (60) days after receiving the notice of default, a Financing Party acquires possession thereof, or commences appropriate judicial or non-judicial proceedings to obtain the same; (ii) such Financing Party is prosecuting any such proceedings to completion with commercially reasonable diligence; and (iii) after gaining possession thereof, such Financing Party performs all other obligations as and when the same are due in accordance with the terms of the Lease. If a Financing Party is prohibited by any process or injunction issued by any court or by reason of any action of any court having jurisdiction over any bankruptcy or insolvency proceeding involving Lessee from commencing or prosecuting the proceedings described above, then the sixty (60)-day period specified above for commencing such proceedings shall be extended for the period of such prohibition.

(e) Financing Parties shall have no obligation or liability to the Lessor for performance of the Lessee's obligations under the Lease prior to the time the Financing Party acquires title to the Leasehold Estate. A Financing Party shall be required to perform the obligations of the Lessee under this Lease only for and during the period the Financing Party directly holds such Leasehold Estate. Any assignment pursuant to this Section 15 shall release the assignor from obligations accruing under this Lease after the date the liability is assumed by the assignee.

(f) Each Financing Party shall have the absolute right to do one, some or all of the following things: (i) assign the rights, mortgage or pledge held by Financing Party (the "Financing Party's Lien"); (ii) enforce the Financing Party's Lien; (iii) acquire title (whether by foreclosure, assignment in lieu of foreclosure or other means) to the Leasehold Estate; (iv) take possession of and operate the Facilities or any portion thereof and perform any obligations to be performed by Lessee under the Lease, or cause a receiver to be appointed to do so; (v) assign or transfer the Leasehold Estate to a third party; or (vi) exercise any rights of Lessee under this Lease. Lessor's consent shall not be required for any of the foregoing; and, upon acquisition of the Leasehold Estate by a Financing Party or any other third party who acquires the same from or on behalf of the Financing Party or any purchaser who purchases at a foreclosure sale, Lessor shall recognize the Financing Party or such other party (as the case may be) as Lessee's proper successor, and this Lease shall remain in full force and effect.

(g) If this Lease is terminated for any reason whatsoever, including a termination by Lessor on account of a Lessee Default Event, or if this Lease is rejected by a trustee of Lessee in a bankruptcy or reorganization proceeding or by Lessee as a debtor-in-possession (whether or not such rejection shall be deemed to terminate this Lease), if requested by Financing Party, Lessor shall execute a new lease (the "New Lease") for the Leased Premises with the Financing Parties (or their designee(s), if applicable) as Lessee, within thirty (30) days following the date of such request. The New Lease shall be on substantially the same terms and conditions as are in this Lease (except for any requirements or conditions satisfied by Lessee prior to the termination or rejection). Upon execution of the New Lease by Lessor, Financing Parties (or their designee, if applicable) shall pay to Lessor any and all sums owing by Lessee under this Lease that are unpaid and that would, at the time of the execution of the New Lease, be due and payable under this Lease if this Lease had not been terminated or rejected. The provisions of this Section 15(g) shall survive any termination of this Lease prior to the expiration of the Term, and any

rejection of this Lease in any bankruptcy or reorganization proceeding.

(h) Lessor consents to each Financing Party's security interest, if any, in the Facilities and waives all right of levy for rent and all claims and demands of every kind against the Facilities, such waiver to continue so long as any sum remains owing from Lessee to any Financing Parties. Lessor agrees that the Facilities shall not be subject to distraint or execution by, or to any claim of, Lessor.

16. INDEMNIFICATION; WAIVER. (a) Each Party shall indemnify, defend, and hold harmless the other Party and its Related Persons from and against any and all third-party suits, claims, or damages suffered or incurred by the indemnified Party and its Related Persons arising out of physical damage to property and physical injuries to any person, including death, caused by the indemnifying Party or its Related Persons except to the extent such claims arise out of the negligence or willful misconduct of the indemnified Party or its Related Persons. (b) Each Party shall indemnify, defend and hold harmless the other Party and its Related Persons from and against all suits, claims, or damages suffered or incurred by the indemnified Party and its Related Persons arising out of or relating to the existence at, on, above, below or near the Leased Premises of any Hazardous Substance, except to the extent deposited, spilled or otherwise caused by the indemnified Party or any of its contractors or agents, provided that Lessee shall not be obligated to indemnify Lessor with respect to any Hazardous Substance on the Leased Premises prior to the Effective Date.

17. INSURANCE. Lessee shall, at its sole cost and expense, keep and maintain in force commercial general liability insurance including broad form property damage liability, personal injury liability, and contractual liability coverage, on an "occurrence" basis, with a combined single limit, which may be effected by primary and excess coverage, of not less than Five Million Dollars (\$5,000,000.00) during the primary term, except that such limit in the Primary Term shall be instead not less than One Million Dollars (\$1,000,000.00) until such time as Lessee commences physical testing of any injection wells or other similar commercial activities, with such commercially reasonable deductibles as Lessee, in its discretion, may deem appropriate. Lessor shall be named as an additional insured in such policy but only to the extent of the liabilities specifically assumed by the Lessee under this Lease. The policy shall contain provisions by which the insurer waives any right of subrogation it may have against Lessor and shall be endorsed to provide that the insurer shall give Lessor thirty days written notice before any material modification or termination of coverage. Upon Lessor's request, Lessee shall promptly deliver certificates of such insurance to Lessor.

18. MISCELLANEOUS.

(a) **Confidentiality.** Lessor shall maintain in the strictest confidence, and shall require each of Lessor's Related Persons to hold and maintain in the strictest confidence, for the benefit of Lessee, all information pertaining to the compensation paid under this Lease, any information regarding Lessee and its business, operations on the Leased Premises or on any other lands, the capacity and suitability of the Reservoir, and any other information that is deemed proprietary or that Lessee requests or identifies to be held confidential, in each such case whether disclosed by Lessee or discovered by Lessor.

(b) **Liens.** (i) Lessee shall protect the Leased Premises from liens of every character arising from its activities on the Leased Premises, provided that Lessee may, at any time and without the consent of Lessor, encumber, hypothecate, mortgage, pledge, or collaterally assign (including by mortgage, deed of trust or personal property security instrument) all or any portion of Lessee's right, title or interest under this Lease (but not Lessor's right, title or interest in the Leased Premises), as security for the repayment of any indebtedness and/or the performance of any obligation. (ii) Lessor shall not directly or indirectly cause, create, incur, assume or allow to exist any mortgage, pledge, lien, charge, security interest, encumbrance or other claim of any nature on or with respect to the Facilities, Operations or any interest therein. Lessor shall immediately notify Lessee in writing of the existence of any such mortgage, pledge, lien, charge, security interest, encumbrance or other claim, shall promptly cause the same to be discharged and released of record without cost to Lessee, and shall indemnify the Lessee against all costs and expenses (including reasonable attorneys' fees) incurred in discharging and releasing any such

mortgage, pledge, lien, charge, security interest, encumbrance or other claim.

(c) **Warranty of Title.** Lessor represents and warrants to Lessee that Lessor is the owner in fee of the surface and subsurface pore space of the Leased Premises. Lessor hereby warrants and agrees to defend title to the Leased Premises and Lessor hereby agrees that Lessee, at its option, shall have the right to discharge any tax, mortgage, or other lien upon the Leased Premises, and in the event Lessee does so, Lessee shall be subrogated to such lien with the right to enforce the same and apply annual rental payments or any other such payments due to Lessor toward satisfying the same. At any time on or after the Effective Date, Lessee may obtain for itself and/or any Financing Party, at Lessee's expense, a policy of title insurance in a form and with exceptions acceptable to Lessee and/or such Financing Party in its sole discretion (the "Title Policies"). Lessor agrees to cooperate fully and promptly with Lessee in its efforts to obtain the Title Policies, and Lessor shall take such actions as Lessee or any Financing Party may reasonably request in connection therewith.

(d) **Conduct of Operations.** Each Party shall, at its expense, use best efforts to comply (and cause its Related Persons to comply) in all material respects with all laws applicable to its (or their) activities on the Leased Premises, provided that each Party shall have the right, in its sole discretion, to contest, by appropriate legal proceedings, the validity or applicability of any law, and the other Party shall cooperate in every reasonable way in such contest, at no out-of-pocket expense to the cooperating Party. During the Primary Term, Lessee, its agents, affiliates, servants, employees, nominees and licensees shall be entitled to: (i) apply for and obtain any necessary permits, approvals and other governmental authorizations (collectively called "Governmental Authorizations") required for the development, construction, operation and maintenance of the Project and Lessor agrees to co-operate, execute, obtain or join with Lessee in any applications or proceedings relating to the Governmental Authorizations upon Lessee's written request and at Lessee's direction, cost and expense; and (ii) apply for any approvals and permits and any zoning amendment of any area of the Leased Premises required in connection with the Project, and Lessor agrees to co-operate, execute, obtain or join with Lessee in any applications or proceedings relating to such approvals, permits and zoning amendments upon Lessee's written request and at Lessee's direction, cost and expense.

(e) **Title to Carbon Dioxide.** As between Lessor and Lessee, all right, title, interest and ownership to all Carbon Dioxide injected into any Reservoir shall belong to Lessee, as measured by corresponding Storage Fee payment to Lessor.

(f) **Hazardous Substances.** Lessee shall have no liability for any regulated hazardous substances located on the Leased Premises prior to the Effective Date or placed in, on or within the Leased Premises by Lessor or any of its Related Persons on or after the Effective Date, and nothing in this Lease shall be construed to impose upon Lessee any obligation for the removal of such regulated hazardous substances.

(g) **Interference.** Lessee shall peaceably and quietly have, hold and enjoy the Leased Premises against any person claiming by, through or under the Lessor and without disturbance by the Lessor, unless Lessee is found in default of the terms of this Lease and such default is continuing. Lessor shall not unreasonably interfere with Lessee's access to or maintenance of the Facilities or associated use of Leased Premises under this Lease; endanger the safety of Lessor, Lessee, the general public, private or personal property, or the Facilities; or install or maintain or permit to be installed or maintained vegetation, undergrowth, trees (including overhanging limbs and foliage and any trees standing which are substantially likely to fall), buildings, structures, installations, and any other obstructions which unreasonably interfere to Lessee access or use of the Facilities, Formations or Lessee's use of the Leased Premises under this Lease. Lessor shall not engage in any activity or permit its Related Persons to engage in any activity that might damage or undermine the physical integrity of any Formation or interfere with Lessee's use of the Leased Premises under this Lease, provided however that it is understood by Lessee that Lessor has no right to permit or to prohibit the exercise of any mineral rights not owned by Lessor at the time of entering into the Option to Lease between Lessor and Lessee with respect to the Leased Premises. Neither Lessee nor its agents will engage in any activity that damages existing oil, gas and

other mineral exploration and development activities occurring on the Leased Premises without first obtaining permission from the relevant mineral rights holder.

(h) **Reservations.** Lessor reserves the right to sell, lease, or otherwise dispose of any interest in the Leased Premises subject to the rights granted in this Lease and agrees that sales, leases, or other dispositions of any interest or estate in the Leased Premises shall be expressly made subject to the terms of this Lease and shall not unreasonably interfere with Lessee's rights under this Lease.

(i) **Taxes.** Lessor shall pay for all real estate taxes and other assessments levied upon the Leased Premises. Lessee shall pay any taxes, assessments, fines, fees, and other charges levied by any governmental authority against its Facilities on the Leased Premises. The Parties agree to cooperate fully to obtain any available tax refunds or abatements with respect to the Leased Premises. Lessee shall have the right to pay all taxes, assessments and other fees on behalf of Lessor and to deduct the amount so paid from other payments due to Lessor hereunder.

(j) **Amendments.** Lessee reserves the right to revise this Lease to remedy any mistakes, including correcting the names of the Parties, the legal description of the Leased Premises, or otherwise. In the event that any amendment alters the bonus and royalty payable under Section 5(a)-(b) of this Lease, the Lessee shall pay the Lessor the amount owed under the Lease as amended. Any amendments must be in writing and signed by both parties.

(k) **Remedies.** Notwithstanding anything to the contrary in this Lease, neither Party shall be liable to the other for any indirect, special, punitive, incidental or exemplary damages, whether foreseeable or not and whether arising out of or in connection with this Lease, by statute, in contract, tort, including negligence, strict liability or otherwise, and all such damages are expressly disclaimed.. This provision does not limit Lessee's obligation to indemnify Lessor for third-party suits, claims, or damages under Section 16 of this Lease.

(l) **Financial Responsibility.** Lessee will comply with all applicable law regarding financial responsibility for Carbon Dioxide storage, and will post bonds or other financial guarantees as required by the government entities.

(m) **Attorneys' Fees.** If any suit or action is filed or arbitration commenced by either Party against the other Party to enforce this Lease or otherwise with respect to the subject matter of this Lease, the prevailing party shall be entitled to recover reasonable costs and attorneys' fees incurred in investigation of related matters and in preparation for and prosecution of such suit, action, or arbitration as fixed by the arbitrator or court, and if any appeal or other form of review is taken from the decision of the arbitrator or any court, reasonable costs and attorneys' fees as fixed by the court.

(n) **Representations and Warranties.** Lessor represents and warrants to Lessee the following as of the Effective Date and covenants that throughout the Term: (i) Lessor has the full right, power and authority to grant rights, interests and license as contained in this Lease. Such grant of the right, interests and license does not violate any law, ordinance, rule or other governmental restriction applicable to the Lessor or the Leased Premises and is not inconsistent with and will not result in a breach or default under any agreement by which the Lessor is bound or that affects the Leased Premises. (ii) Neither the execution and delivery of this Lease by Lessor nor the performance by Lessor of any of its obligations under this Lease conflicts with or will result in a breach or default under any agreement or obligation to which Lessor is a party or by which Lessor or the Leased Premises is bound. (iii) All information provided by Lessor to Lessee, as it pertains to the Leased Premises' physical condition, along with Lessor's rights, interests and use of the Leased Premises, is accurate in all material respects. (iv) Lessor has no actual or constructive notice or knowledge of Hazardous Substances at, on, above, below or near the Leased Premises. (v) Each of the undersigned represents and warrants that they have the authority to execute this Lease on behalf of the Party for which they are signing.

(o) **Severability.** Should any provision of this Lease be held, in a final and unappealable decision by a court of competent jurisdiction, to be either invalid, void or unenforceable, the remaining provisions

of this Lease shall remain in full force and effect, unimpaired by the holding. If the easements or other rights under this Lease are found to be in excess of the longest duration permitted by applicable law, the term of such easements or other rights shall instead expire on the latest date permitted by applicable law.

(p) **Memorandum of Lease.** This Lease shall not be recorded in the real property records. Lessee shall cause a memorandum of this Lease to be recorded in the real property records of the county in which the Leased Premises is situated. A recorded copy of said memorandum shall be furnished to Lessor within thirty (30) days of recording.

(q) **Notices.** All notices required to be given under this Lease shall be in writing, and shall be deemed to have been given upon (a) personal delivery, (b) one (1) Business Day after being deposited with FedEx or another reliable overnight courier service, with receipt acknowledgment requested, or (c) upon receipt or refused delivery deposited in the United States mail, registered or certified mail, postage prepaid, return receipt required, and addressed to the respective Party at the addresses set forth at the beginning of this Lease, or to such other address as either Party shall from time to time designate in writing to the other Party.

(r) **No Waiver.** The failure of either Party to insist in any one or more instances upon strict performance of any of the provisions of this Lease or to take advantage of any of its rights hereunder shall not be construed as a waiver of any such provision or the relinquishment of any such rights, but the same shall continue and remain in full force and effect.

(s) **Estoppels.** Either party hereto (the "Receiving Party"), without charge, at any time and from time to time, within ten (10) Business Days after receipt of a written request by the other party hereto (the "Requesting Party"), shall deliver a written statement, duly executed, certifying to such Requesting Party, or any other person, firm or entity specified by such Requesting Party: (i) that this Lease is unmodified and in full force and effect, or if there has been any modification, that the same is in full force and effect as so modified and identifying the particulars of such modification; (ii) whether or not, to the knowledge of the Receiving Party, there are then existing any offsets or defenses in favor of such Receiving Party against enforcement of any of the terms, covenants and conditions of this Lease and, if so, specifying the particulars of same and also whether or not, to the knowledge of such Receiving Party, the Requesting Party has observed and performed all of the terms, covenants and conditions on its part to be observed and performed, and if not, specifying the particulars of same; and (iii) such other information as may be reasonably requested by the Requesting Party. Any written instrument given hereunder may be relied upon by the recipient.

(t) **Counterparts.** This Lease may be executed in any number of counterparts, each of which, when executed and delivered, shall be an original, but all of which shall collectively constitute one and the same instrument.

(u) **Governing Law.** This Lease shall be governed, interpreted, and enforced in accordance with the laws of the state of North Dakota.

(v) **Further Action.** Each Party will execute and deliver all documents, provide all information, and take or forbear from all actions as may be necessary or appropriate to achieve the purposes of this Lease, including without limitation executing a memorandum of easement and all documents required to obtain any necessary government approvals.

(w) **Entire Agreement.** This Lease, into which the attached **Exhibit A** is incorporated by reference, contains the entire agreement of the Parties. There are no other conditions, agreements, representations, warranties, or understandings, express or implied.

[Remainder of page intentionally left blank. Signature page follows.]

IN WITNESS OF THE ABOVE, Lessor and Lessee have caused this Lease to be executed and delivered by their duly authorized representatives as of the Effective Date.

LESSOR:

By: _____
Print: _____

By: _____
Print: _____

LESSEE:

MINNKOTA POWER COOPERATIVE, INC.

By: _____
Print: _____
Its: _____

Exhibit A

LEGAL DESCRIPTION OF THE PROPERTY

The Leased Premises consists of the lands located in Oliver County, North Dakota that are owned by the Lessor and generally described as follows:

For purposes of calculating the royalty payable under Section 5(b) of this Lease, the Parties stipulate that the Leased Premises consists of _____ acres.

73933018.1

Minnkota Power Cooperative, Inc.

Case No. 29032

Application of Minnkota Power Cooperative, Inc. requesting consideration for the geologic storage of carbon dioxide from the Milton R. Young Station located in Sections 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 17, 18, 19, 20, 21, Township 141 North, Range 83 West, Sections 1, 2, 12, 13, Township 141 North, Range 84 West, Sections 19, 20, 21, 22, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, Township 142 North, Range 83 West, Sections 35, 36, Township 142 North, Range 84 West, Oliver County, North Dakota pursuant to North Dakota Administrative Code Section 43-05-01. View the draft storage facility permit, fact sheet, and storage facility permit application at www.dmr.nd.gov/oilgas/. Minnkota intends to capture carbon dioxide from the Milton R. Young Station and sequester it in the Deadwood Formation. The Commission will accept and consider written comments on the merits of the application and draft permit if received no later than 5:00 pm CDT November 1, 2021. Submit written comments to the Oil and Gas Division, 1016 East Calgary Avenue, Bismarck, North Dakota 58503-5512 or brkadrmas@nd.gov. Further draft permit information may be obtained from Steve Fried, and further hearing information may be obtained from Bethany Kadrmass, both at the North Dakota Oil and Gas Division, 1016 East Calgary Avenue, Bismarck, North Dakota 58503-5512, 701-328-8020. Minnkota Power Cooperative, Inc., 5301 32nd Avenue South, Grand Forks, ND 58201.

Case No. 29033

Application of Minnkota Power Cooperative, Inc. to consider the amalgamation of the storage reservoir pore space, in which the Commission may require that the pore space owned by nonconsenting owners be included in the geologic storage facility and subject to geologic storage, as required to operate the Minnkota Power Cooperative, Inc. storage facility located in Sections 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 17, 18, 19, 20, 21, Township 141 North, Range 83 West, Sections 1, 2, 12, 13, Township 141 North, Range 84 West, Sections 19, 20, 21, 22, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, Township 142 North, Range 83 West, Sections 35, 36, Township 142 North, Range 84 West, Oliver County, North Dakota, in the Deadwood Formation, pursuant to North Dakota Century Code Section 38-22-10.

Case No. 29034

Application of Minnkota Power Cooperative, Inc. for an order of the Commission determining the amount of financial responsibility for the geologic storage of carbon dioxide from the Milton R. Young Station in the storage facility located in Sections 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 17, 18, 19, 20, 21, Township 141 North, Range 83 West, Sections 1, 2, 12, 13, Township 141 North, Range 84 West, Sections 19, 20, 21, 22, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, Township 142 North, Range 83 West, Sections 35, 36, Township 142 North, Range 84 West, Oliver County, North Dakota, in the Deadwood Formation, pursuant to North Dakota Administrative Code Section 43-05-01-09.1.

November 2, 2021

Minnkota Power Cooperative, Inc.
Tundra – Deadwood Formation
Exhibit 2 – PART II

EXHIBIT B

Tract Summary

Attached to and made part of the Storage Agreement
Tundra Deadwood - Secure Geological Storage
Oliver County, North Dakota

<u>Tract</u> <u>No.</u>	<u>Land Description</u>	<u>Owner Name</u>	<u>Tract Net Acres</u>	<u>Tract Participation</u>	<u>Storage Facility</u> <u>Participation</u>	<u>Acreage Leased</u>
1	Section 22-T142N-R83W	Melvin Schoepp Caroline K. Schoepp Raymond Friedig, as personal representative of the Estate of Magdalen F. Friedig, deceased	20.000 20.000 120.000	12.50000000% 12.50000000% 75.00000000%	0.10580214% 0.10580214% 0.63481282%	0.10580214%
		Tract Total:	160.000	100.00000000%		
2	Section 21-T142N-R83W	Mary Erhardt Keith Erhardt Keith Erhardt and Kelly Jo Erhardt Melvin Schoepp and Caroline Schoepp	120.000 35.000 5.000 320.000	25.00000000% 7.29166667% 1.04166667% 66.66666667%	0.63481282% 0.18515374% 0.02645053% 1.69283418%	0.63481282% 0.18515374% 0.02645053% 1.69283418%
		Tract Total:	480.000	100.00000000%		
3	Section 20-T142N-R83W	Mary Erhardt Matthias A. Erhardt, as trustee of the Matthias A. Erhardt Trust dated December 27, 1994 Josephine Erhardt, as trustee of the Josephine Erhardt Trust dated December 27, 1994	160.000 40.000 40.000	66.66666667% 16.66666667% 16.66666667%	0.84641709% 0.21160427% 0.21160427%	0.84641709% 0.21160427% 0.21160427%
		Tract Total:	240.000	100.00000000%		

4	Section 19-T142N-R83W	Matthias A. Erhardt, trustee, or successor trustee(s), of the Matthias A. Erhardt Trust dated December 27, 1994	20.000	50.00000000%	0.10580214%	0.10580214%
		Josephine Erhardt, trustee, or successor trustee(s), of the Josephine Erhardt Trust dated December 27, 1994	20.000	50.00000000%	0.10580214%	0.10580214%
		Tract Total:	40.000	100.00000000%		
5	Section 30-T142N-R83W	Minnkota Power Cooperative, Inc.	322.170	73.22045455%	1.70431371%	1.70431371%
		Ryan J. Weber	40.000	9.09090909%	0.21160427%	0.21160427%
		Darlene Voegele	77.830	17.68863636%	0.41172901%	0.41172901%
		Tract Total:	440.000	100.00000000%		
6	Section 29-T142N-R83W	Minnkota Power Cooperative, Inc.	92.360	14.43125000%	0.48859427%	0.48859427%
		Darlene Voegele	227.640	35.56875000%	1.20423991%	1.20423991%
		Darlene M. Voegele and Kennie D. Voegele	300.000	46.87500000%	1.58703204%	1.58703204%
		Terrie Nehring	20.000	3.12500000%	0.10580214%	0.10580214%
		Tract Total:	640.000	100.00000000%		
7	Section 28-T142N-R83W	Minnkota Power Cooperative, Inc.	160.000	25.00000000%	0.84641709%	0.84641709%
		Dale Barth	476.320	74.42500000%	2.51978368%	
		Dusty Backer	3.680	0.57500000%	0.01946759%	
		Tract Total:	640.000	100.00000000%		
8	Section 27-T142N-R83W	Dale Barth	560.000	100.00000000%	2.96245982%	
		Tract Total:	560.000	100.00000000%		
9	Section 26-T142N-R83W	Raymond Friedig, as personal representative of the Estate of Magdalen F. Friedig, deceased	154.460	77.23000000%	0.81710990%	
		Lori Spina-Hoherz	20.000	10.00000000%	0.10580214%	
		Larry Doll	10.000	5.00000000%	0.05290107%	
		Fay Doll	10.000	5.00000000%	0.05290107%	0.05290107%

		Randolph Middleton and Mary Middleton	5.540	2.77000000%	0.02930719%	0.02930719%
		Tract Total:	200.000	100.00000000%		
10	Section 35-T142N-R83W	Brennan Price	560.000	100.00000000%	2.96245982%	
		Tract Total:	560.000	100.00000000%		

11	Section 34-T142N-R83W	Minnkota Power Cooperative, Inc.	480.000	75.00000000%	2.53925127%	2.53925127%
		State of North Dakota GF	160.000	25.00000000%	0.84641709%	
		Tract Total:	640.000	100.00000000%		
12	Section 33-T142N-R83W	Square Butte Electric Cooperative	3.900	0.60937500%	0.02063142%	0.02063142%
		Minnkota Power Cooperative, Inc.	625.040	97.66250000%	3.30652836%	3.30652836%
		ALLETE, INC.	11.060	1.72812500%	0.05850858%	
		Tract Total:	640.000	100.00000000%		
13	Section 32-T142N-R83W	Minnkota Power Cooperative, Inc.	545.830	85.28593750%	2.88749900%	2.88749900%
		Darlene Voegele	37.470	5.85468750%	0.19822030%	0.19822030%
		BNI Coal, Ltd.	56.700	8.85937500%	0.29994906%	
		Tract Total:	640.000	100.00000000%		
14	Section 31-T142N-R83W	Brian Reinke	109.658	16.93612158%	0.58010253%	0.58010253%
		Benjamin Reinke	173.626	26.81565454%	0.91850009%	0.91850009%
		Elizabeth Wagendorf	173.626	26.81565454%	0.91850009%	0.91850009%
		Darlene Voegele	149.640	23.11113857%	0.79161158%	0.79161158%
		BNI Coal, Ltd.	40.930	6.32143078%	0.21652407%	
		Tract Total:	647.480	100.00000000%		
15	Section 36-T142N-R84W	State of North Dakota Board of University and School Lands	320.000	100.00000000%	1.69283418%	
		Tract Total:	320.000	100.00000000%		
16	Section 35-T142N-R84W	Michael P. Dresser	80.000	100.00000000%	0.42320855%	
		Tract Total:	80.000	100.00000000%		
17	Section 2-T141N-R84W	City of Center Park District	46.050	10.68544645%	0.24360942%	0.24360942%
		Barry A. Berger and Carrie Berger	286.460	66.47020605%	1.51540400%	1.51540400%
		Dwight Wrangham and Linda Wrangham	3.000	0.69612029%	0.01587032%	
		BNI Coal, Ltd.	95.450	22.14822721%	0.50494070%	

Tract Total:

430.960

100.00000000%

32	Section 13-T141N-R84W	BNI Coal, Ltd.	280.000	100.00000000%	1.48122991%	
		Tract Total:	280.000	100.00000000%		
33	Section 18-T141N-R83W	Dohrmann, as Trustees of The Janet and L.J. Dohrmann Revocable Trust	123.820	19.12100809%	0.65502103%	0.65502103%
		Wayne Reuther	33.957	5.24378693%	0.17963439%	0.17963439%
		Kent Reuther	33.957	5.24378693%	0.17963439%	0.17963439%
		Keith Reuther	33.957	5.24378693%	0.17963439%	0.17963439%
		Karen Shulz	33.957	5.24378693%	0.17963439%	0.17963439%
		Jerald Reuther	33.957	5.24378693%	0.17963439%	0.17963439%
		Martha Reuther	33.957	5.24378693%	0.17963439%	0.17963439%
		Larry F. Schmidt and Virginia Schmidt	318.000	49.10741862%	1.68225397%	1.68225397%
		BNI Coal, Ltd.	2.000	0.30885169%	0.01058021%	
		Tract Total:	647.560	100.00000000%		
34	Section 17-T141N-R83W	Five D's LLP	320.000	50.00000000%	1.69283418%	1.69283418%
		Jerald O. Reuther	79.698	12.45286458%	0.42161270%	0.42161270%
		Wayne A. Reuther	53.333	8.33333333%	0.28213903%	0.28213903%
		Karen L. Reuther	26.667	4.16666667%	0.14106952%	0.14106952%
		Jeanette M. Reuther	0.302	0.04713542%	0.00159585%	0.00159585%
		Larry F. Schmidt and Virginia Schmidt	160.000	25.00000000%	0.84641709%	0.84641709%
		Tract Total:	640.000	100.00000000%		
35	Section 16-T141N-R83W	Larry F. Schmidt and Virginia Schmidt	160.000	25.00000000%	0.84641709%	0.84641709%
		BNI Coal, Ltd.	160.000	25.00000000%	0.84641709%	
		State of North Dakota - Dept. of Trust Lands Attn: Commissioner of University and School Lands	320.000	50.00000000%	1.69283418%	
		Tract Total:	640.000	100.00000000%		
36	Section 15-T141N-R83W	Delmar Hagerott	240.000	100.00000000%	1.26962564%	1.26962564%
		Tract Total:	240.000	100.00000000%		
37	Section 14-T141N-R83W	Alan Schwalbe	190.000	100.00000000%	1.00512029%	1.00512029%
		Tract Total:	190.000	100.00000000%		

38	Section 21-T141N-R83W	Douglas D. Doll and Deberra K. Doll	100.000	22.72727273%	0.52901068%	0.52901068%
		James D. Pazdernik and Bonita Pazdernik	100.000	22.72727273%	0.52901068%	0.52901068%
		Doll Farm Enterprises	160.000	36.36363636%	0.84641709%	0.84641709%
		Delmar Hagerott	80.000	18.18181818%	0.42320855%	0.42320855%
		Tract Total:	440.000	100.00000000%		
39	Section 20-T141N-R83W	Douglas D. Doll and Deberra K. Doll	80.000	25.00000000%	0.42320855%	0.42320855%
		James D. Pazdernik and Bonita Pazdernik	80.000	25.00000000%	0.42320855%	0.42320855%
		Dale P. Pfliger and Judy Pfliger	80.000	25.00000000%	0.42320855%	0.42320855%
		Thomas Pfliger	80.000	25.00000000%	0.42320855%	0.42320855%
		Tract Total:	320.000	100.00000000%		
40	Section 19-T141N-R83W	Winfried Keller	120.000	49.59497438%	0.63481282%	0.63481282%
		Jerald Reuther	23.684	9.78839478%	0.12529089%	0.12529089%
		Wayne Reuther	23.684	9.78839478%	0.12529089%	0.12529089%
		Kent Reuther	23.684	9.78839478%	0.12529089%	0.12529089%
		Keith Reuther	27.224	11.25144652%	0.14401787%	0.14401787%
		Karen Shulz	23.684	9.78839478%	0.12529089%	0.12529089%
		Tract Total:	241.960	100.00000000%		
Total Acres:			18903.210	Total Participation:	100.00000000%	79.19083584%
						79.19083584%

Minnkota Power Cooperative, Inc.

Case No. 29032

Application of Minnkota Power Cooperative, Inc. requesting consideration for the geologic storage of carbon dioxide from the Milton R. Young Station located in Sections 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 17, 18, 19, 20, 21, Township 141 North, Range 83 West, Sections 1, 2, 12, 13, Township 141 North, Range 84 West, Sections 19, 20, 21, 22, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, Township 142 North, Range 83 West, Sections 35, 36, Township 142 North, Range 84 West, Oliver County, North Dakota pursuant to North Dakota Administrative Code Section 43-05-01. View the draft storage facility permit, fact sheet, and storage facility permit application at www.dmr.nd.gov/oilgas/. Minnkota intends to capture carbon dioxide from the Milton R. Young Station and sequester it in the Deadwood Formation. The Commission will accept and consider written comments on the merits of the application and draft permit if received no later than 5:00 pm CDT November 1, 2021. Submit written comments to the Oil and Gas Division, 1016 East Calgary Avenue, Bismarck, North Dakota 58503-5512 or brkadrmas@nd.gov. Further draft permit information may be obtained from Steve Fried, and further hearing information may be obtained from Bethany Kadrmas, both at the North Dakota Oil and Gas Division, 1016 East Calgary Avenue, Bismarck, North Dakota 58503-5512, 701-328-8020. Minnkota Power Cooperative, Inc., 5301 32nd Avenue South, Grand Forks, ND 58201.

Case No. 29033

Application of Minnkota Power Cooperative, Inc. to consider the amalgamation of the storage reservoir pore space, in which the Commission may require that the pore space owned by nonconsenting owners be included in the geologic storage facility and subject to geologic storage, as required to operate the Minnkota Power Cooperative, Inc. storage facility located in Sections 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 17, 18, 19, 20, 21, Township 141 North, Range 83 West, Sections 1, 2, 12, 13, Township 141 North, Range 84 West, Sections 19, 20, 21, 22, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, Township 142 North, Range 83 West, Sections 35, 36, Township 142 North, Range 84 West, Oliver County, North Dakota, in the Deadwood Formation, pursuant to North Dakota Century Code Section 38-22-10.

Case No. 29034

Application of Minnkota Power Cooperative, Inc. for an order of the Commission determining the amount of financial responsibility for the geologic storage of carbon dioxide from the Milton R. Young Station in the storage facility located in Sections 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 17, 18, 19, 20, 21, Township 141 North, Range 83 West, Sections 1, 2, 12, 13, Township 141 North, Range 84 West, Sections 19, 20, 21, 22, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, Township 142 North, Range 83 West, Sections 35, 36, Township 142 North, Range 84 West, Oliver County, North Dakota, in the Deadwood Formation, pursuant to North Dakota Administrative Code Section 43-05-01-09.1.

November 2, 2021

Minnkota Power Cooperative, Inc.
Tundra – Deadwood Formation
Exhibit 3

INDUSTRIAL COMMISSION
STATE OF NORTH DAKOTA
DATE 11/2/21 CASE NO. 29032-34
Introduced By Minnkota
Exhibit 3
Identified By Minnkota

October 26, 2021

Oil & Gas Division
1016 East Calgary Avenue
Bismarck, North Dakota 58503-5512

Re: Draft Storage Facility Permit: Minnkota Power Cooperative, Inc. Case #-29032 (Black Island and Deadwood) Applicant has failed to comply with North Dakota Century Code Chapter (NDCC) 38-22 and North Dakota Administrative Code (NDAC) Chapter 43-05-01 for a carbon dioxide storage facility permit.

Director Helms,

Thank you for the opportunity to make comments about the above reference case before the North Dakota Industrial Commission. Upon review of the Draft Storage Facility Permit, Minnkota Power Cooperative Inc. (Minnkota) permit application does not comply with North Dakota State law requirements (NDCC) 38-22 and (NDAC) 43-05-01 for safe long-term storage of CO₂ by the sequestration method and there is potential for leakage of the CO₂ from the injection formation (Black Island / Deadwood). Failure of the CO₂ Storage Facility could allow for contamination of the near surface fresh-water aquifers and surface water features.

1.

Technical data presented by Minnkota to the North Dakota Industrial Commission reveal incomplete evaluation of geological data, engineering data and 2-D & 3-D geophysical data to properly assess and characterize the confinement formation (Icebox) and injection formations (Black Island / Deadwood) and lower confinement formations as described in their permit application. Additional failure to comply requirements are specified below and are addressed in this letter.

2.

Within the application Minnkota states in 2.2.2.6 (Seismic Survey) "A 5-mi-long seismic source test and 6.5-mi² 3D seismic survey were acquired in 2019, and a 12-mi² 3D seismic survey and 21 mi of 2D seismic lines were acquired in 2020 (Figure 2-6). The 3D seismic data allowed for visualization of deep geologic formations at lateral spatial intervals as short as tens of feet. The 2D seismic data provided a means to connect the two 3D seismic data sets and ensure consistent interpretation across the Tundra SGS area. The seismic data were used for assessment of the geologic structure, interpretation of interwell heterogeneity, and well placement. Data products generated from the interpretation and inversion of the 3D seismic data were used as inputs into the geologic model. Additionally, the geologic model that was informed by the seismic data was used to simulate migration of the CO₂ plume. These simulated CO₂ plumes were used to inform the testing and monitoring plan (Section 4).

3.

The 3D seismic data and J-LOC1 and J-ROC1 well logs were used to interpret surfaces for the formations of interest within the survey area. These surfaces were converted to depth using the time-to-depth relationship derived from the J-LOC1 and J-ROC1 sonic logs. The depth-converted surfaces for the storage reservoir and upper and lower confining zones were used as inputs for the geologic model. These surfaces captured detailed information about the structure and varying thickness of the formations between wells. Interpretation of the 3D seismic data suggests there are no major stratigraphic pinch-outs or structural features with associated spill points in the Tundra SGS area. No structural features, faults, or discontinuities that would cause a concern about seal integrity in the strata above the Deadwood Formation extending to the deepest USDW, the Fox Hills Formation, were observed in the seismic data."

4.

Minnkota have spent over \$1 million dollars on acquisition and processing of 2-D and 3-D seismic data in 2019 and 2020 over the proposed storage facility area, CO₂ injection well and monitor wells. Yet, Minnkota fail to display any geophysical maps (structure maps or isopach maps of the cap rock and containment formations) constructed and calibrated with existing well data for any subsurface formations. Why? Minnkota states above (2.2.2.6) they constructed data products from seismic interpretations utilized for modeling. It is imperative for

5.

the commission to review such geophysical data, interpretations and maps to fully understand the geological setting across the Storage Facility area and the proposed injection site location to ensure the cap-rock and containment formations do not have faults which breach both and would allow for CO2 to escape and contaminate fresh-water aquifers.

6. Minnkota failed to display any 2-D or 3-D seismic data (Figure #2-6) from the surface to the basement (Precambrian) within the storage facility area and AoR in support of their CO2 storage permit application. One wonders why spend over \$1 million dollars, complete required work and then not display final products in support of the CO2 storage facility permit application. No 3-D seismic lines which directly tie the proposed injection well were depicted to the Commission in support of the CO2 storage application. Four 2-D seismic lines were acquired and processed which directly tie the proposed injection well yet once again none of this data is utilized in support of the CO2 storage facility permit application and depicted for the Commission. Additional 2-D seismic legacy data is available within the storage facility area.

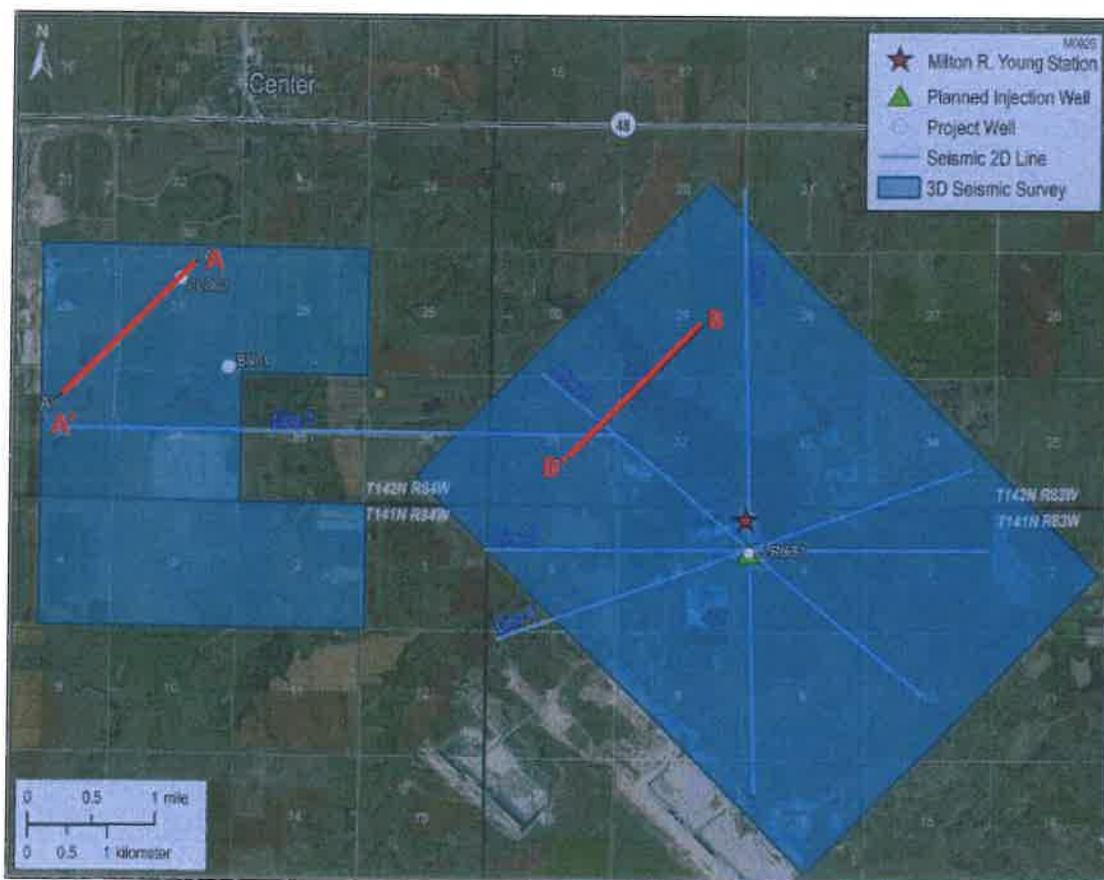


Figure 2-6. Map showing the 2D and 3D seismic surveys in the Tundra SGS area.

7. Minnkota have displayed (Figure #2-7) partial lines (250'-400' of data out of over 9000' of data) from two different 3-D seismic impedance volumes which only depict the Icebox (cap rock) formation and the Black Island / Deadwood Formations (injection zone). Minnkota select one partial data line over the proposed monitor well and another partial data line which is approximately one mile from the proposed injection well location from the 3-D seismic volumes. Utilizing the limited amount of impedance 3-D seismic data presented in support of the CO2 storage facility permit application allows for one to interpret several faults within the Icebox and Black Island / Deadwood (injection zone) formations. Applicant states above an evaluation has been completed from Deadwood to fresh-water aquifers. 3-D seismic data and interpretations displayed to the Commission are

incomplete and lack technical merit for the Commission to make a reasonable evaluation of the CO2 storage container (Storage Facility area) integrity. One can clearly depict near vertical faults within the Icebox and Black Island / Deadwood formations utilizing applicant's 3-D impedance seismic data.

8. Applicant indirectly accepts a much higher degree of risk (trust me) for CO2 storage facility failure of the cap-rock and injection formations by withholding critical scientific data. The Commission should not allow the State of North Dakota to accept additional risk of a CO2 storage facility containment failure.

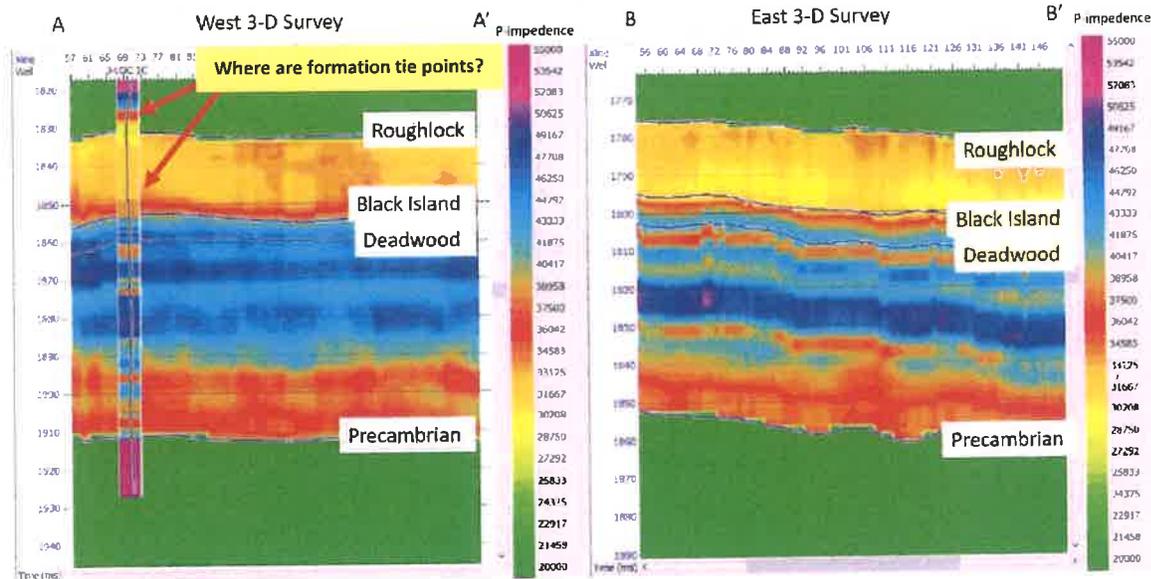


Figure 2-7. Left: cross section of the inverted acoustic impedance volume for the western seismic 3D survey that transects the J-LOC1 well. The acoustic impedance log calculated from the J-LOC1 sonic and density logs is shown on the inset panel. Right: cross section of the inverted acoustic impedance volume for the eastern 3D survey.

Figure 2-7

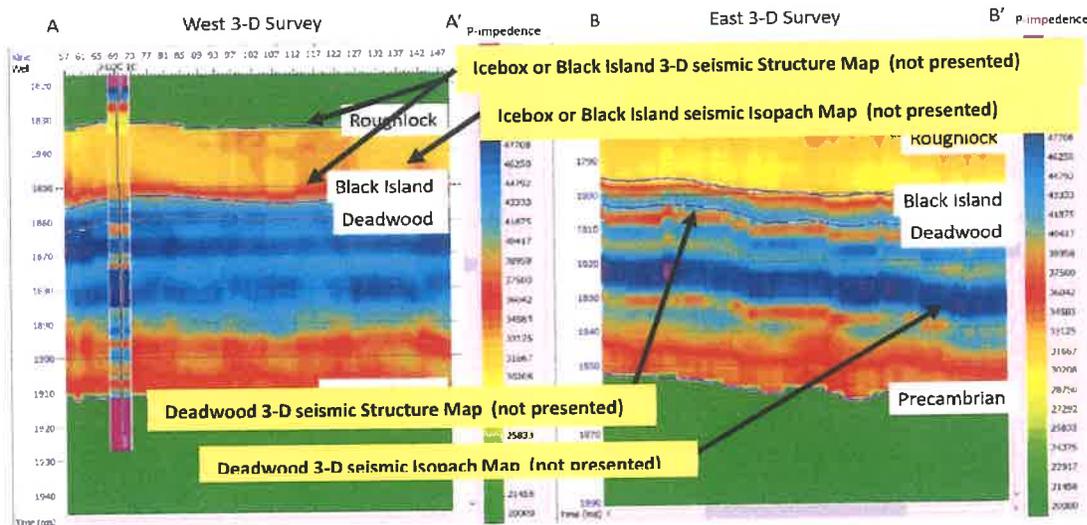


Figure 2-7. Left: cross section of the inverted acoustic impedance volume for the western seismic 3D survey that transects the J-LOC1 well. The acoustic impedance log calculated from the J-LOC1 sonic and density logs is shown on the inset panel. Right: cross section of the inverted acoustic impedance volume for the eastern 3D survey.

Figure 2-7(a)

9. (Figure 2-7) is 3-D impedance seismic data depicted in the Minnkota permit application. Figure 2-7(a) highlighted in yellow text depicts data (maps) which should have been included in support of the CO2 storage permit application. This data is required to effectively evaluate the storage facility area and integrity. Without this data,

the North Dakota Industrial Commission will be making a CO2 storage facility permit decision based solely on subsurface well control data. Why acquire 2-D and 3-D seismic data?

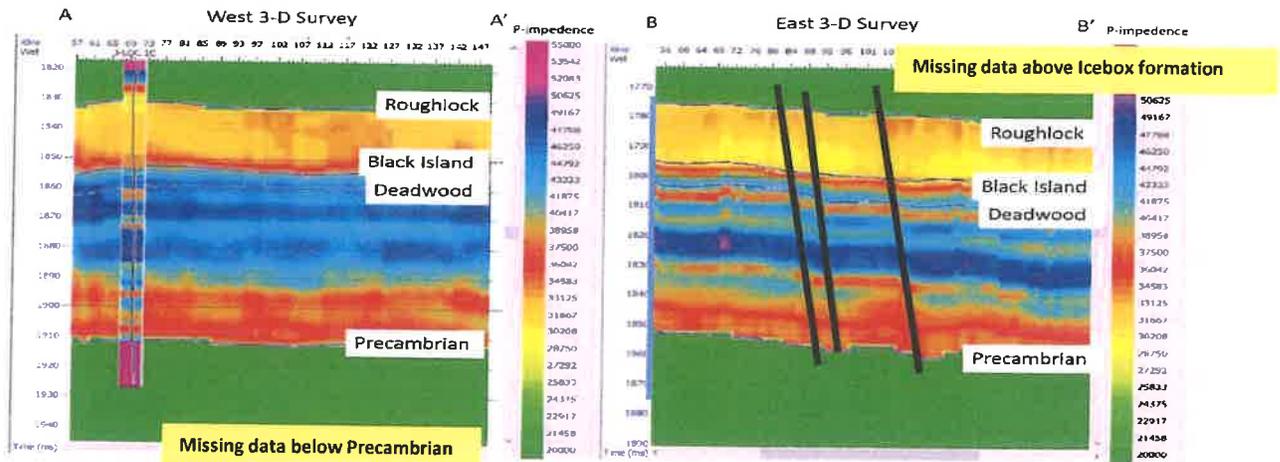


Figure 2-7. Left: cross section of the inverted acoustic impedance volume for the western seismic 3D survey that transects the J-LOC1 well. The acoustic impedance log calculated from the J-LOC1 sonic and density logs is shown on the inset panel. Right: cross section of the inverted acoustic impedance volume for the eastern 3D survey.

Figure 2-7(b)

10. (Figure #2-7)(b) Interpretation of the limited 3-D impedance lines depicts several near vertical faults within the Deadwood formation. Faults are almost vertical which are typical for the Williston Basin. The faults depicted in Figure 2-7(b) appear to breach the cap-rock formations. Note: one can also see vertical display issues within the Deadwood Formation which may be caused by scaling (zoom in) of the 3-D impedance seismic data for this CO2 storage facility permit application. All 3-D seismic data above the Icebox formation and below the Deadwood formation have been removed. Why? Why not be transparent? Covering up data (green) from a permit application leads to suspicion of applicant's interpretations of data.

11. Applicant projects a direct well tie via synthetic seismogram on Figure #2-7 (west 3-D seismic survey) as previously stated. No formation tops are displayed on the synthetic trace from well log data for the J-LOC-1. Where is the top and base of the Icebox and Black Island / Deadwood formations displayed on the synthetic seismogram? One could ask from the amount of data displayed, is this the Icebox and Deadwood formations? Applicant has not proven the seismic data displayed is the top and base of the Icebox, Black Island and Deadwood formations. One can see seismic frequencies of the synthetic trace are much higher than the actual 3-D seismic data displayed and are not an exact seismic tie and can lead to mis-ties of both 2-D and 3-D seismic data. Thus, incorrect interpretations.

12. No 3-D seismic data and synthetic seismogram ties from the J-ROC1 wellbore are depicted in the permit application. Data quality at the J-ROC1 is probably poor which does not allow for a direct synthetic seismogram tie of the 3-D seismic data. Well log data from the J-ROC-1 and J-LOC-1 depict different stratigraphy at the top of the Deadwood formation. Is the data displayed in Figure #2-7 the Black Island / Deadwood formations?

13. This permit application also indicated \$100,000 dollars per sq. mi. (\$3.0-\$4.2 million) will be required for a new larger 3-D seismic survey within the AoR to monitor the CO2 plume for this potential CO2 storage facility site. Why budget money if one has no intention to display data, interpretations, and results?

14. A previous final report "North Dakota Integrated Carbon Storage Complex Feasibility Study" which was funded and completed by the Department of Energy concerning this same potential storage facility area as a multiple formation injection and containment site for CO2 storage have figures which are depicted below. No geophysical maps or 3-D seismic lines were depicted in that 285-page report. The report depicted two unidentified time

slices. First (Figure A-5, Page # 74) which is displayed below. The Figures are displayed to inform the Commission of how some data can be interpreted differently and what is stated may not necessarily be correct.

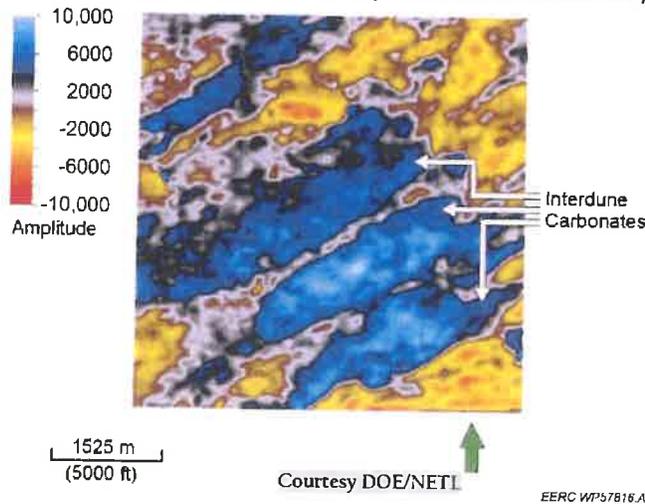


Figure A-5. Map view of seismic amplitude time slice through the Broom Creek Formation with interpreted geobodies. High amplitude values (blue) caused by thin bed tuning indicate the presence of interdunal carbonates.

15.

Figure A-5 (above) depicts a timeslice from the above mentioned report. Figure A-5 states “Map view of seismic amplitude time slice through the Broom Creek Formation with interpreted geobodies. High amplitude values (blue) caused by thin bed tuning indicate the presence of interdunal carbonates”. That statement is incorrect and does not indicate the blue amplitude are interdunal carbonates.” Thin bed tuning relates to the ability of seismic data to resolve the top and base of a seismic event. (Figure #1) As the thickness between the top and base decrease (formation or geologic feature) the seismic character (trough to peak or peak to trough) will not be able to resolve top and base thickness (thus below tuning thickness). One must have an existing well (none depicted in figure) with a sonic log and porosity logs directly tied to each seismic event to justify that statement. A more reasonable interpretation is the positive amplitude events (blue) depicted are a shale/siltstone within the Deadwood formation and the amplitude scale varies (stratigraphy) within the formation which makes it appear there are three separate geologic features, when in fact it is one formation or geologic feature. The 4th blue amplitude featured in figure A-5 is not defined as an interdunal carbonate.

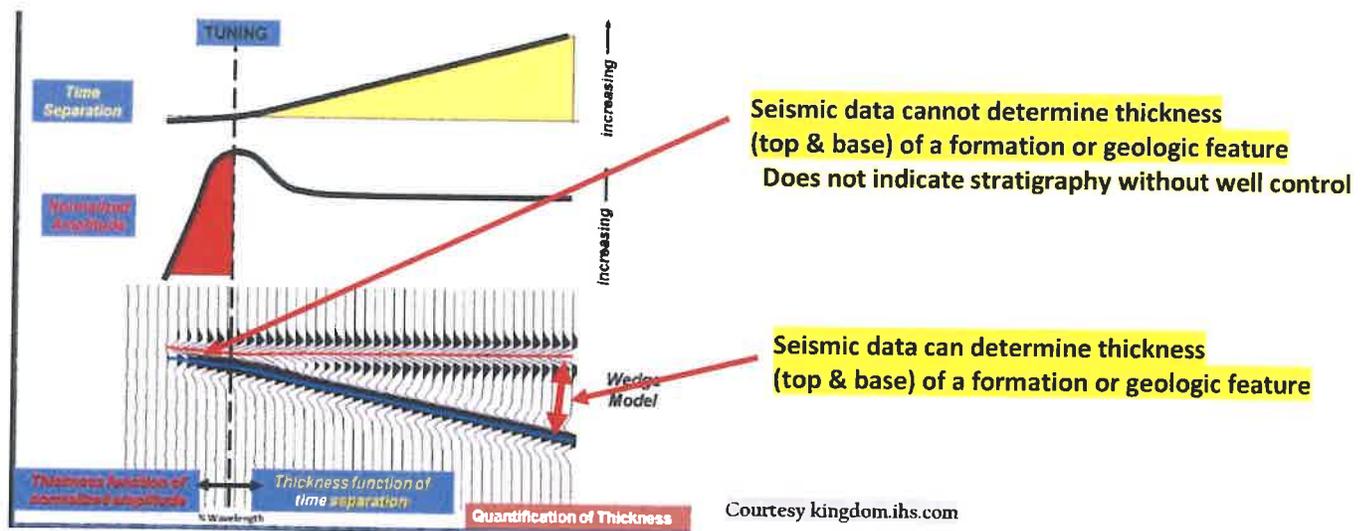


Figure #1 (Seismic Tuning Model)

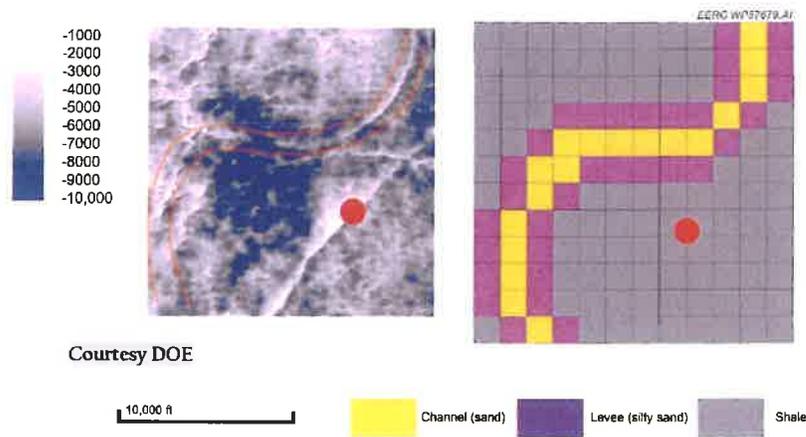


Figure B-10. Left: Map view of seismic amplitude time slice through the Inyan Kara Formation with interpreted channel feature. Right: Training image. The Flemmer-1 wellsite location is represented by a red dot.

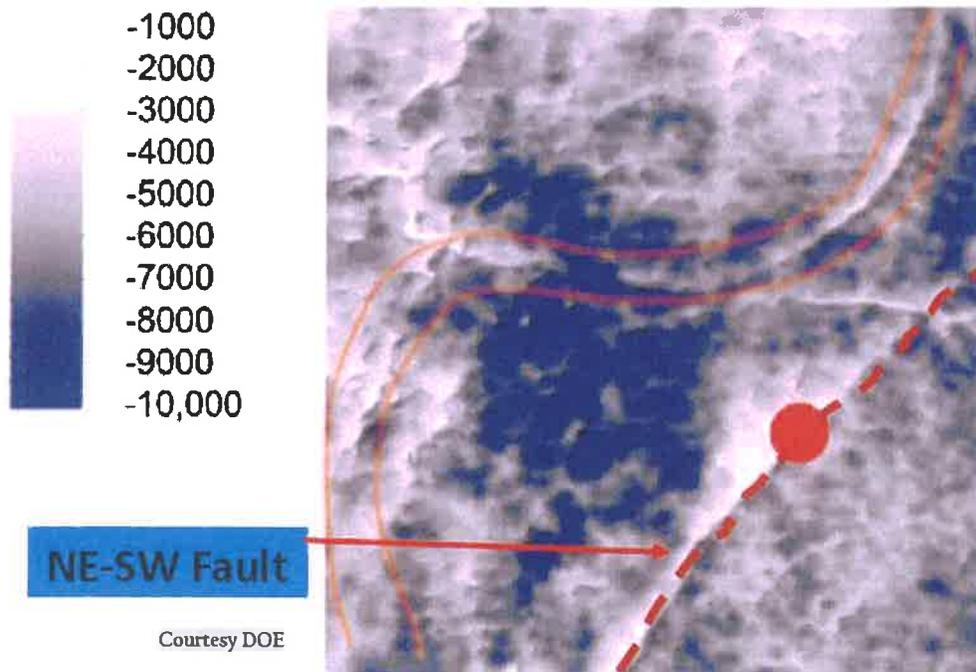
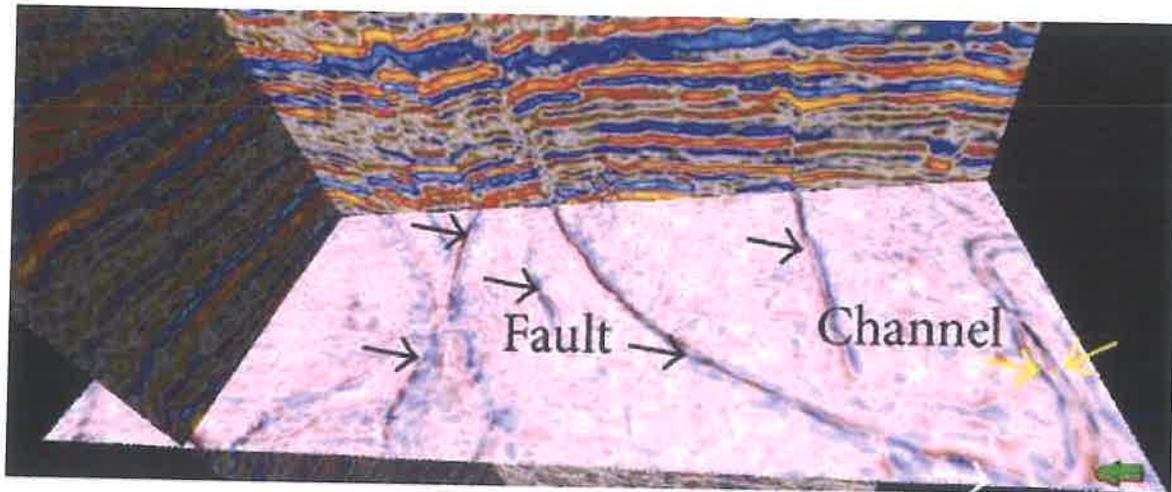


Figure B-10(a)

16.

Figure B-10 Page #114 (above) is another time slice from the report “North Dakota Integrated Carbon Storage Complex Feasibility Study” which depicts the location of the Flemmer #1 (monitor well) near the AVS-GPSP storage site. Figure B-10(a) A partial interpretation of the same time slice clearly depicts a fault with a NE to SW orientation adjacent to the Flemmer-1 wellbore. The features within the orange boundaries appear to be additional faults and are not a channel feature as stated. Channel feature can usually be distinguished by a contrast from the outer edges (overbank-channel area) of a channel, not from the middle as has been suggested while viewing time slice data. How can the middle of a channel contrast (same rock- stratigraphy)? One can also see stripping effects (acquisition footprint) within this 3-D seismic data set. 3-D seismic data examples are utilized to demonstrate the effectiveness of proper interpretation of 3-D seismic data can reduce storage containment failure risk.



Courtesy researchdate.net

Figure B-11

17. Figure B-11 (channel example) depicts a combination of a 3-D vertical seismic line with an associated time slice. This figure was included to demonstrate to the Commission one can identify both faults and channels utilizing existing 3-D seismic data. Note, the channel displayed on the time slice is recognized by the overbank-channel contrast as previously stated. Also, both positive and negative amplitudes are demonstrated in this example. Note the faults have zero amplitudes (white) depicted, are in the middle of a fault.

18. Department of Energy (DOE) have utilized time slice data for past CO₂ projects. An article published by DOE in 2013 "Time-lapse surface seismic inversion with thin bed resolution for monitoring CO₂ sequestration: A case study from Cranfield, Mississippi" depicts several time slices. Figure #3 (below) from the article depicts four time slices of the Tuscaloosa injection zone across the entire 3-D seismic survey. The first time slice being pre-injection of CO₂, the second post injection of CO₂. One can easily recognize the difference in the seismic data from CO₂ as stated in the article. Additionally, one can easily recognize at least one major fault within the AoR. The fault trends in a northwest to southeast orientation. Figure #4(a) from the article depicts a portion of the inline from the 3-D seismic survey. The inline extend the entire length of the 3-D seismic survey. Note the fault can clearly be recognized on inline 1102.

19. Figure # 5 (below) is a comparison of the amount of 3-D seismic data the applicant has given the Commission to evaluate this CO₂ storage facility permit. Only the Tuscaloosa (injection zone) formation is depicted in Figure #5.

20. One can assume 3-D seismic data quality around the injection well is probably poor as there is a lake adjacent to the proposed CO₂ injection well and within the storage facility area. Without proper undershooting (acquisition) of the lake a large data gap at the surface will be observed on the 3-D seismic data volume. This surface data gap will affect all 3-D seismic data quality under the lake and near the lake in the subsurface 3-D seismic data volume. Figure #8 below depicts similar large surface data gaps on the seismic line displayed.

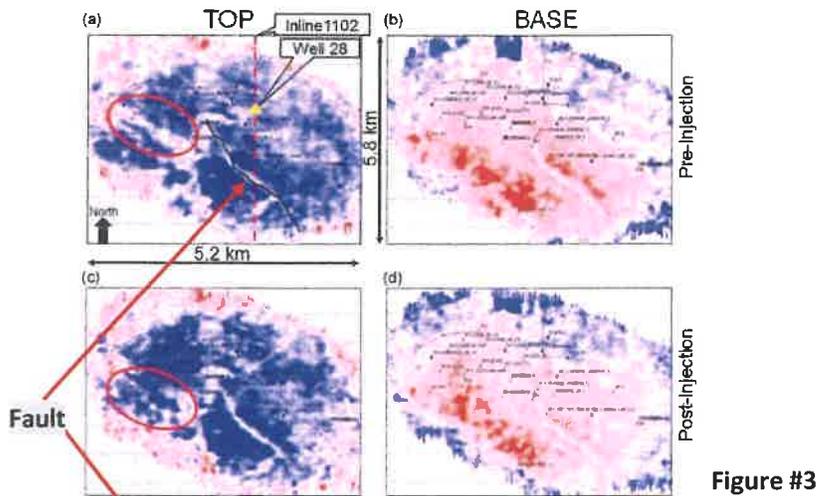


Fig. 3. Time-lapse seismic amplitude data at top and base of injection interval. (a) and (b) The top and base slices at pre-injection conditions; (c) and (d) The top and base slices post injection. [For interpretation of the references to color in this citation of figure the reader is referred to the web version of the article.]

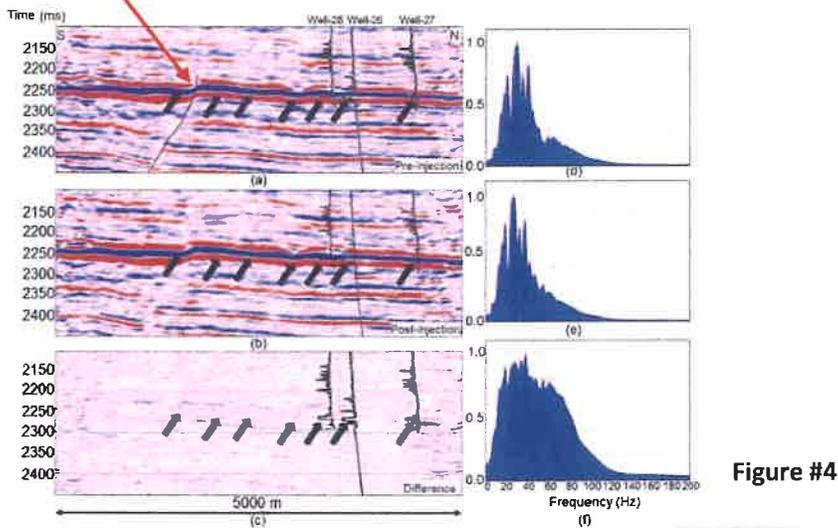


Fig. 4. Cross-sections along inline-1102 are shown for (a) pre-injection amplitudes, (b) post-injection amplitudes, and (c) differences. Frequency spectra (d) pre-injection and (e) differences are shown in the right column. The injection interval is marked by the black arrows.



Figure #5 Courtesy DOE



Figure #6

Figure #5 depicts only the top and base of the Tuscaloosa injection zone (no scale change from Figure 4(a)) from inline 1102. Most of the data from Figure #4(a) have been removed to depict Figure #5

21. Figure #6 depicts one of the 3-D impedance lines (Figure 2-7 (B-B')) taken from the applicant's storage facility permit application with a similar scale for appearance and comparison to Figure #5. It is impossible for the Commission to evaluate the cap-rock and injection formations integrity of the storage facility area from this limited amount of data. Applicant depicts less than 3.1% of actual data of one strike line from the 3D seismic survey. 96.9% of the seismic line depicted in Figure 2-7 is missing.

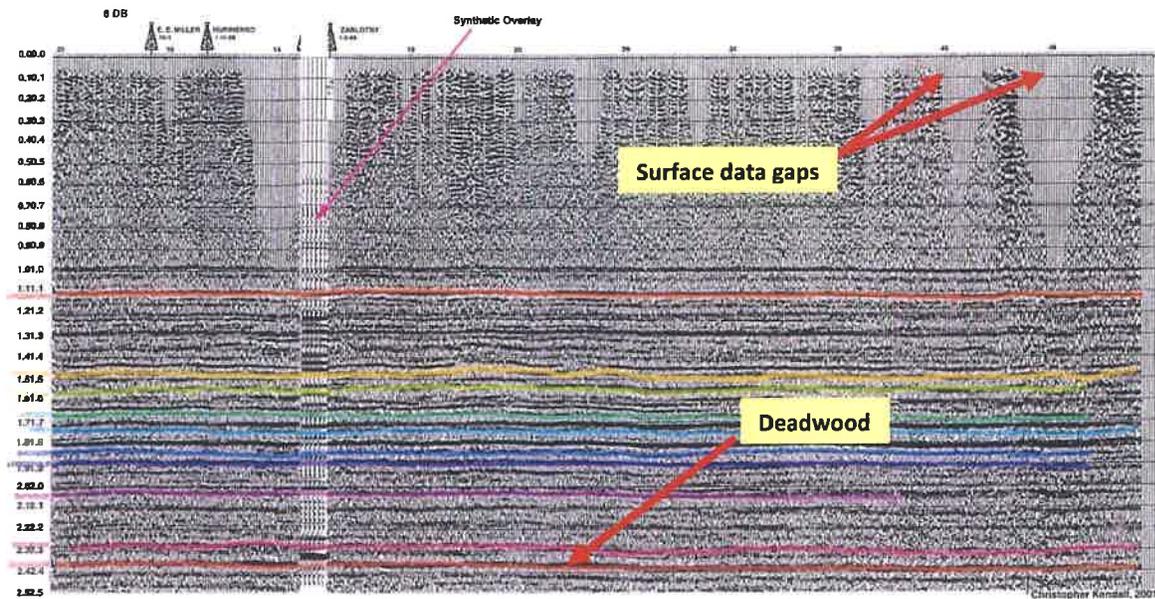


Figure #8 (Little Knife Oil Field: 2-D seismic line in Williston Basin)

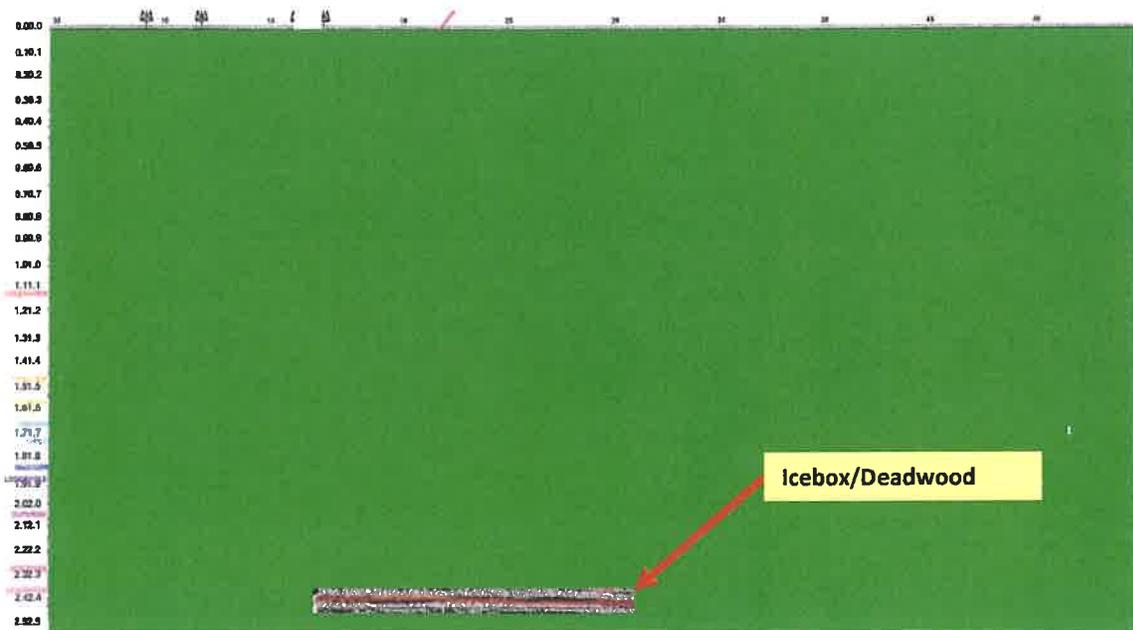


Figure #8a (Little Knife Oil Field: 2-D seismic line in Williston Basin, displayed with missing data similar to Minnkota Storage Facility permit application)

22. Figures #8 and #8a depict a Gulf Oil Company seismic line over Little Knife Field located in the Williston Basin which has been published several times. Figure #8 depicts the entire 2-D seismic line. Figure #8a demonstrates the same amount of seismic data Minnkota depicts in the Storage Facility permit application. Applicant has denied the Commission the opportunity to review and evaluate 2-D and 3-D seismic data acquired and processed specifically for this CO₂ storage facility permit application.

23. Applicant should display several strike lines, dip lines and arbitrary lines from the 3-D seismic volumes which display normal migrated (black and white wiggle trace filled) seismic data from surface to well below the Precambrian formation in support of this CO₂ storage storage facility permit application. Several lines should

storage facility area. Applicant could also depict the full migrated 2-D migrated seismic lines previously licensed to the Commission for review.

Existing 2-D seismic data (Legacy) locations

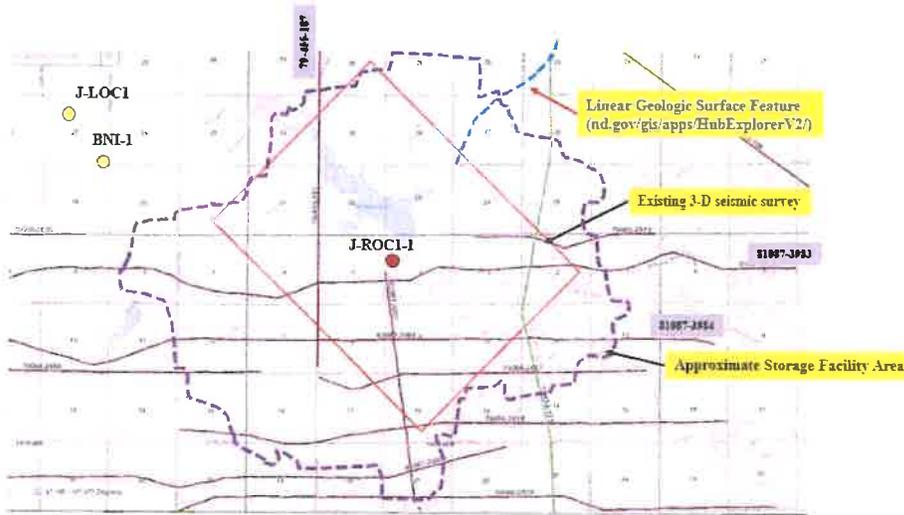


Figure #10: Base map depicts existing 2-D seismic data over CO2 storage facility area

28.

Applicant may have licensed an existing regional 2-D seismic line (81087-3983) which is an east-west line located approximately 2200' south of the J-ROCI-1 wellbore and within the Storage Facility area and the AoR. This line extends over five miles east and five miles west of the proposed CO2 injection well. Applicant has not mentioned or displayed this line in the CO2 Storage Facility Permit application. This line is required to assist in characterization of the CO2 Storage Facility area and the AoR in an east-west direction. Additional existing 2-D seismic data may also have been licensed by applicant within the Storage Facility area and AoR and are not depicted for this CO2 Storage Facility Permit application. If available from applicant, this data could be useful to fully evaluate the Storage Facility area and AoR for potential regional and localized faults.

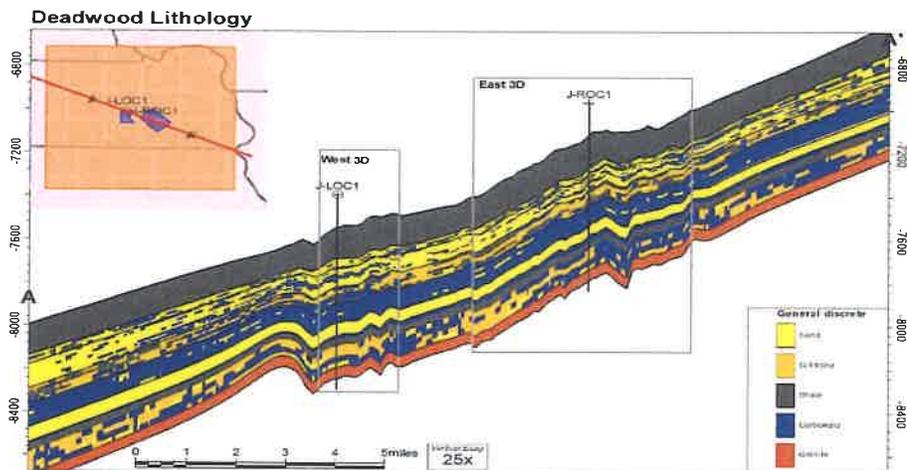


Figure 2-14. Cross section of the Tundra SGS CO₂ storage complex from the geologic model showing lithofacies distribution in the Deadwood Formation. Depths are referenced to mean sea level.

Figure 2-14

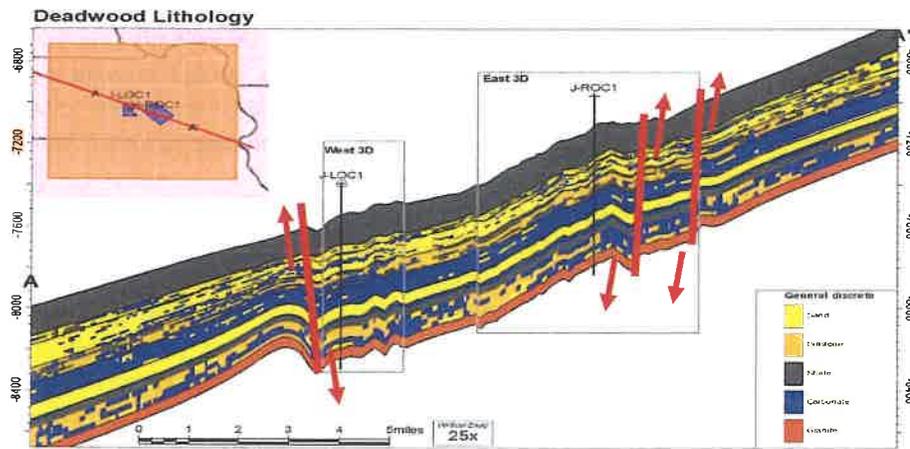


Figure 2-14. Cross section of the Tundra SGS CO₂ storage complex from the geologic model showing lithofacies distribution in the Deadwood Formation. Depths are referenced to mean sea level.

Figure 2-14(a): Applicant Lithofacies Distribution Model

29. Figure 2-14(a) depicts applicant's lithofacies distribution cross section with interpreted faults. Faults appear to be associated with 2-D and 3-D seismic interpretations not depicted in the permit application. Faults could easily extend much higher in the section as Precambrian is below the Deadwood and Icebox formations. Faults could be associated linear basement features.

30. Pursuant to NDCC 38-22 (Carbon Dioxide Underground Storage) and NDAC 43-05-01 (Geologic Storage of Carbon Dioxide) applicant has not presented all technical work required for the North Dakota Industrial Commission to make a comprehensive decision on the storage facility area and integrity from the CO₂ Storage Facility Permit Application. Applicant has withheld vital geologic and geophysical data, incorrectly displayed geologic and geophysical data, or did not acquire geological and geophysical data required in the permit application which could reduce the risk of a CO₂ storage facility failure.

Applicant has failed to comply with (NDCC) 38-22-08 permit requirements as follow:

31. 38-22-08(1) That the storage has complied with all requirements set by the commission

1. Applicant has failed to provide and depict all characterization interpretations and correct detailed seismic data and interpretations, geologic/geophysical maps, and cross sections for a comprehensive evaluation of the CO₂ storage facility permit application as required by the State of North Dakota and the Commission.
2. Applicant has failed to acquire MDT, FMI or QuantaGeo logs at the proposed injection wellbore (J-ROC1) location or within the CO₂ storage facility area as required by the State of North Dakota.
3. Applicant has failed to address a Linear Geologic Surface Feature within the proposed Storage Facility area which usually indicate the presence of subsurface faults as required by the State of North Dakota.

32. 38-22-08(2) That the storage facility is suitable and feasible for carbon dioxide injection and storage

1. Applicant has not demonstrated the storage facility is suitable and feasible for carbon dioxide injection and storage by withholding critical geological/geophysical maps and both 2-D and 3-D seismic data (strike lines, dip lines, arbitrary lines, time slices, etc.) for interpretation and inspection by the State of North Dakota and the Commission. As depicted above, strike lines, dip lines, arbitrary

3. Applicant failed to run an FMI or QuantaGeo log in the proposed injection wellbore (J-ROC1) which can demonstrate faults and fractures within the cap rock formations and injection formation within the Storage Facility area. Applicant has failed to confirm from all geologic, geophysical, and engineering data that carbon dioxide will not escape from the storage reservoir.

34. 38-22-06(10) That the storage facility will not endanger human health nor unduly endanger the environment.

1. Applicant's permit application clearly has a higher degree of containment failure risk as stated above which will clearly endanger human health and endanger the environment (permanent contamination of fresh-water aquifers and surface water ponds, lakes, streams). Faults within confinement and injection zones.
2. Applicant has not addressed Linear Geologic Surface Features (which are usually associated with faults) within the CO2 Storage Facility area and the AoR. Surface/Near-surface fault(s) could extend downward through fresh-water aquifers into deeper formations. CO2 could escape confinement and travel through a series of faults to fresh-water aquifers and surface water (lakes, streams, etc.). If CO2 escapes and makes its way to the surface it will collect in surface sink areas and could potential kill all human and wildlife within surface sink areas.

35. 38-22-08(11) That the storage facility is in the public interest.

1. At present the applicant's CO2 storage permit application is not in the public interest as the risk of CO2 storage facility containment failure clearly outweighs the removal of CO2 from the atmosphere. Applicant has failed to provide and depict all characterization data, interpretations, and maps for a comprehensive evaluation by the State of North Dakota and Commission of the CO2 storage facility area and AOR.

36. 38-22-08(12) That the horizontal and vertical boundaries of the storage reservoir are defined. These boundaries must include buffer areas to ensure that the storage facility is operated safely and as contemplated.

1. Applicant has not demonstrated the storage reservoir has been defined. As previously stated, the vertical boundaries have not been determined directly over the proposed Injection wellsite, storage facility area and a substantial portion of the AoR (storage reservoir). Applicant has withheld critical geological/geophysical maps and both 2-D and 3-D seismic data for interpretation and inspection by the State of North Dakota and Commission. Applicant has not demonstrated accurate detailed structure maps and isopach maps of the cap-rock formations (Icebox) and injection formations (Black Island / Deadwood) which define the vertical and horizontal extent of the potential CO2 storage reservoir. Applicant has not depicted any seismic data (2-D or 3-D) which depicts both the cap rock formation and the injection formation in this application. Applicant has only depicted maps constructed from existing well control for the horizontal and vertical boundaries of the storage reservoir. Applicant has not addressed interpreted faults depicted in Figure 2-7(b). Applicant has not defined the horizontal and vertical boundaries of the storage reservoir utilizing all existing and required scientific data.
2. Applicant failed to run MDT logs over the confinement formation and injection formation or any other formation at the proposed injection well location (J-ROC1) or within the Storage Facility area. Applicant does not have any Microfracture in situ stress tests from the J-ROC1 wellbore and cannot determine formation pressures, high quality fluid samples and permeability anisotropy within the Storage Facility area as required by the State of North Dakota. Applicant projects incomplete MDT data from a wellbore located over 4.5 miles (outside the proposed storage facility area) from the

proposed CO₂ injection wellbore (J-ROC1) wherein geologic conditions (depth, stratigraphy, structure, dip rates, pressures, etc.) have changed above the cap rock formations, within the cap rock formations, within the injection formation and below the injection formation. Without formation pressure data applicant cannot defined the horizontal and vertical boundaries of the storage reservoir as required by the State of North Dakota.

37. Applicant has failed to comply with NDAC (43-05-01)(C-4) Geologic Exhibits i. Structural and stratigraphic cross sections that describe the geologic conditions at the storage reservoir.

3. Applicant has failed to depict accurate well log cross sections which depict the structural configuration of the storage reservoir. Figure 2-12b (Regional well log cross section etc.) depicts two cartoon structural cross sections which are not accurate. The cross sections are not displayed relative to sea level and do not indicate true formation dips of the geologic conditions at the storage reservoir in a cross-section view. Regional well log structure maps (Figure 2-13) are depicted in subsea depths while both cross sections depicted in Figure 2-12b are in MD or TVD depth, not subsea depth. Accurate structural cross sections could assist in identification of existing faults within the CO₂ Storage Facility area and AoR. Applicant has failed to comply with accurate structural cross sections as required by the State of North Dakota.

38. Applicant has failed to comply with NDAC (43-05-01)(C-4) Geologic Exhibits j. The location, orientation, and properties of known or suspected faults and fractures that may transect the confining zone in the area of review, and a determination that they would not interfere with containment.

1. As previously discussed, Figure 2-7(b) depict several interpreted faults within the injection zone and appear to transect the confining zone. Addition 2-D and 3-D seismic data must be displayed to confirm the extent and orientation of faults within the CO₂ Storage Facility area and AoR.
2. Applicant has failed to address a Linear Geologic Surface Feature approximately 1.2 miles from the proposed injection well location which can be found on the North Dakota government website (nd.gov/gis/apps/HubExplorerV2/). This Linear Geologic Surface Feature is probable related to a large subsurface fault within the storage facility area and AoR. The near surface fresh-water aquifers could be faulted. The fault(s) could also extend several thousand feet below the surface.
3. Applicant failed to run MDT logs over the confinement formation and injection formation or any other formation at the proposed injection well location (J-ROC1) or within the Storage Facility area. Applicant does not have any Microfracture in situ stress tests from the J-ROC1 wellbore and cannot determine formation pressures, high quality fluid samples and permeability anisotropy within the Storage Facility area as required by the State of North Dakota. Applicant projects incomplete MDT data from a wellbore located over 4.5 miles (outside the proposed storage facility area) from the proposed CO₂ injection wellbore (J-ROC1) wherein geologic conditions (depth, stratigraphy, structure, dip rates, pressures, etc.) have changed above the cap rock formations, within the cap rock formations, within the injection formation and below the injection formation.
4. Applicant failed to run an FMI or QuantaGeo log in the proposed injection wellbore (J-ROC1) which can demonstrate faults and fractures within the cap rock formations, injection formation and below the injection formation and within the Storage Facility area. Applicant has no log data within the storage facility area to determine if fractures or faults exist. Applicant cannot definitively state no fractures or faults are present in the storage facility area without this data!

39. Applicant has failed to comply with NDAC (43-05-01)(C-4) Geologic Exhibits k. Data on the depth, areal extent, thickness, mineralogy, porosity, permeability, and capillary pressure of the injection and confining zone,

including facies changes based on field data, which may include geologic cores, outcrop data, seismic surveys, well logs, zone names, and lithologic descriptions.

1. Applicant failed to display critical characterization data from two 3-D seismic survey and four 2-D seismic lines within the Storage Facility area. Applicant did not display any geologic/geophysical maps of the confinement formations, injection formations or any other formations constructed from the 2-D and 3-D seismic data in support of the CO2 storage facility permit application. Applicant did not display any 2-D or 3-D seismic data outside of the proposed cap rock (Icebox) formation and injection formations (Black Island / Deadwood) in support of the CO2 storage facility permit application. Applicant did not address several faults which are depicted in Figure 2-7(b) within the cap rock (Icebox) formation and injection zone (Black Island / Deadwood) formations. No geologic/geophysical maps, interpreted seismic data or migrated seismic data (from surface to Precambrian) were displayed to support the CO2 storage facility permit application.
2. Applicant has failed to address a Linear Geologic Surface Feature approximately 1.2 miles from the proposed injection well location which can be found on the North Dakota government website (nd.gov/gis/apps/HubExplorerV2/). This Linear Geologic Surface Feature is probable related to a surface/near surface faults extending into the subsurface within the Storage Facility area. The Linear Geologic Surface Feature is directly NE of the proposed CO2 injection well location. The orientation of the feature is NE to SW directly toward the proposed CO2 injection well (J-ROC1).
3. Applicant failed to run MDT logs over the confinement formation and injection formation or any other formation at the proposed injection well location (J-ROC1) or within the Storage Facility area. Applicant does not have any Microfracture in situ stress tests from the J-ROC1 wellbore and cannot determine formation pressures, high quality fluid samples and permeability anisotropy within the Storage Facility area as required by the State of North Dakota. Applicant projects incomplete MDT data from a wellbore located over 4.5 miles (outside the proposed storage facility area) from the proposed CO2 injection wellbore (J-ROC1) wherein geologic conditions (depth, stratigraphy, structure, dip rates, pressures etc.) have changed above the cap rock formations, within the cap rock formations, within the injection formation and below the injection formation.

40. Applicant has failed to comply with NDAC (43-05-01)(C-4) Geologic Exhibits L: Geomechanical information on fractures, stress, ductility, rock strength, and in situ fluid pressure within the confining zone. The confining zone must be free of transmissive faults or fractures and of sufficient areal extent and integrity to contain the injected carbon dioxide.

1. Applicant failed to run MDT logs over the confinement formation and injection formation or any other formation at the proposed injection well location (J-ROC1) or within the Storage Facility area. Applicant does not have any Microfracture in situ stress tests from the J-ROC1 wellbore and cannot determine formation pressures, high quality fluid samples and permeability anisotropy within the Storage Facility area as required by the State of North Dakota. Applicant projects incomplete MDT data from a wellbore located over 4.5 miles (outside the proposed storage facility area) from the proposed CO2 injection wellbore (J-ROC1) wherein geologic conditions (depth, stratigraphy, structure, dip rates, pressures, fault(s), etc.) have changed above the cap rock formations, within the cap rock formations, within the injection formation and below the injection formation. Applicant's Geochemical simulations cannot be accurate as all input data are based upon assumptions from outside the Storage Facility area, no actual data exists within the Storage Facility area.
2. Applicant failed to run an FMI or QuantaGeo log in the proposed injection wellbore (J-ROC1) which can demonstrate faults and fractures within the cap rock formations, injection formation and below the injection formation and within the Storage Facility area. Applicant has no log data within the storage facility area to determine if fractures or faults exist. Applicant cannot definitively state no fractures or faults are present in

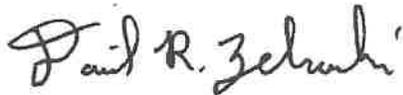
the storage facility area without this data! 3-D seismic data displayed with the permit application clearly depict several faults within the injection formations.

41. I do not object to CO2 Sequestration, on the contrary I fully support DOE/NETL efforts to sequester CO2! My goal is to assist in evaluations of CO2 Storage Facility projects from a public perspective and help reduce risk of potential CO2 containment failures. Many times, I have found companies cut corners just to complete a project and long-term safety of people and the environment are a lesser concern. Applicant could easily remedy most of the deficiencies with additional time and completed work products as suggested and required by the State of North Dakota. Applicant could not receive a Class VI (UIC) injection well permit from the EPA with incomplete data (No MDT, FMI or QuantaGeo log) as demonstrated in this CO2 Storage Facility Permit Application. Hopefully, the North Dakota Industrial Commission will hold applicant to the same standards.

42. Considering the evidenced depicted within this letter I urge (on behalf of several surface owners within the CO2 Storage Facility area) the North Dakota Industrial Commission to reject Minnkota Power Cooperative, Inc's Storage Facility Permit (Case #29032) until such time the applicant fulfills all requirements set forth by the State of North Dakota in NDCC 38-22 (Carbon Dioxide Underground Storage) and NDAC 43-05-01 (Geologic Storage of Carbon Dioxide). Applicant has burdened the State of North Dakota with additional containment failure risks with an incomplete application. It would be extremely unfortunate if CO2 injection begins and immediately escapes the Black Island / Deadwood formation (injection formations).

Thank you for your prompt attention to this matter.

Sincerely,



Daniel R. Zebrowski
CCUS Consulting Geoscientist
4606 FM 1960 West
Suite 400
Houston, Texas 77069

Case No: 29029
October 28, 2021

Stephen Fried
Oil and Gas Division
1016 East Calgary Avenue
Bismarck, North Dakota 58503-5512

Dear Mr. Fried,

After reviewing the documents for the Broom Creek carbon storage permit— we have some concerns about the safety of this project. In our view, before this permit is issued, there should be more robust regulation around carbon storage that will ensure that blow outs and leakage cannot occur. Most concerning within the supporting documents supplied to the Department is that one of the risks listed in Appendix E, on page 516, is classified as **serious** and **likely** to occur: “loss of mechanical integrity injection wells—tubing/ pack leak.” If this were to occur, it could greatly affect both the natural and human environment. The release of injected CO₂ is antithetical to the mission of project Tundra. If this were to become a chronic problem, it could potentially derail the entire project thus wasting millions in taxpayer dollars. Additionally, if the leakage were large enough, it could poison the surrounding air and ecosystem thus greatly harming the health of people within the area.

In addition, research shows that the injection of CO₂ also has the potential for causing small scale earthquakes that can rupture the seal of carbon storage. Specifically, two Stanford scientists recently concluded that while injection from CCS is unlikely to trigger large earthquakes, even small earthquakes from the injection process can break the seal of a CO₂ repository.¹ The injection process of CO₂ storage is incredibly risky and the geologic report for this permit and top scientists agree with these findings. This is likely why as it stands there are no internationally recognized standards for monitoring and verifying that CO₂ sinks will remain underground.²

In conclusion, before this permit is approved, we recommend that there is an internationally recognized system of monitoring and that steps are taken to ensure that every risk in the geologic report is classified as unlikely. Thank you for your time and attention to this matter.

Sincerely,



Scott Skokos

Dakota Resource Council: Executive Director

¹ Zoback, M. D., and S. M. Gorelick. "Earthquake Triggering and Large-Scale Geologic Storage of Carbon Dioxide." *Proceedings of the National Academy of Sciences* 109, no. 26 (2012): 10164–68. <https://doi.org/10.1073/pnas.1202473109>.

² http://www.worc.org/media/Too_Good_to_Be_True_Report.pdf

Kadrmass, Bethany R.

From: Eliot Huggins <eliot@drcinfo.com>
Sent: Monday, November 1, 2021 1:44 PM
To: Kadrmass, Bethany R.
Subject: Permit Public Comments
Attachments: Broom Creek Formation...pdf; Deadwood Formation...pdf

***** **CAUTION:** This email originated from an outside source. Do not click links or open attachments unless you know they are safe. *****

Dear Mr.Fried,
Attached you will find public comment for the Deadwood and Broom Creek carbon storage facilities.
Best,
Eliot

Case No: 29032
October 28, 2021

Stephen Fried
Oil and Gas Division
1016 East Calgary Avenue
Bismarck, North Dakota 58503-5512

Dear Mr. Fried,

After reviewing the documents for the Deadwood carbon storage permit— we have some concerns about the safety of this project. In our view, before this permit is issued, there should be more robust regulation around carbon storage that will ensure that blow outs and leakage cannot occur. Most concerning within the supporting documents supplied to the Department is that one of the risks listed in Appendix E, on page 491, is classified as **serious** and **likely** to occur: “loss of mechanical integrity injection wells—tubing/ pack leak.” If this were to occur, it could greatly affect both the natural and human environment. The release of injected CO₂ is antithetical to the mission of project Tundra. If this were to become a chronic problem, it could potentially derail the entire project thus wasting millions in taxpayer dollars. Additionally, if the leakage were large enough, it could poison the surrounding air and ecosystem thus greatly harming the health of people within the area.

In addition, research shows that the injection of CO₂ also has the potential for causing small scale earthquakes that can rupture the seal of carbon storage. Specifically, two Stanford scientists recently concluded that while injection from CCS is unlikely to trigger large earthquakes, even small earthquakes from the injection process can break the seal of a CO₂ repository.¹ The injection process of CO₂ storage is incredibly risky and the geologic report for this permit and top scientists agree with these findings. This is likely why as it stands there are no internationally recognized standards for monitoring and verifying that CO₂ sinks will remain underground.²

In conclusion, before this permit is approved, we recommend that there is an internationally recognized system of monitoring and that steps are taken to ensure that every risk in the geologic report is classified as unlikely. Thank you for your time and attention to this matter.

Sincerely,



Scott Skokos

Dakota Resource Council: Executive Director

¹ Zoback, M. D., and S. M. Gorelick. “Earthquake Triggering and Large-Scale Geologic Storage of Carbon Dioxide.” *Proceedings of the National Academy of Sciences* 109, no. 26 (2012): 10164–68. <https://doi.org/10.1073/pnas.1202473109>.

² http://www.worc.org/media/Too_Good_to_Be_True_Report.pdf

Kadrmass, Bethany R.

From: zebrowski05@yahoo.com
Sent: Friday, October 29, 2021 4:37 PM
To: Kadrmass, Bethany R.
Subject: Storage Facility Permit Hearing (Case # 29029 and Case # 29032) November 2, 2021 at 9:00 AM CDT (attached letters)
Attachments: Case_#29029_BroomCreek_concerns_10292021DRZ.pdf; Case_#29032_Deadwood_concerns_10292021DRZ.pdf

******* CAUTION:** This email originated from an outside source. Do not click links or open attachments unless you know they are safe. *********

Bethany,

Forgot to send a thank you for the information you sent me below. I will listen in live to the meeting on Tuesday 11/2/2021.

Also, please find attached two PDF letters (files) attached to the e-mail. One letter is in regard to Case # 29029 and the second to case # 29032, Both are in regards to Draft Storage Facility Permits before the North Dakota Industrial Commission. Could you e-mail me to confirm you have received my letters.

Thanks,

Dan Zebrowski

On Thursday, October 14, 2021, 11:38:57 AM CDT, Kadrmass, Bethany R. <brkadrmass@nd.gov> wrote:

Dan,

The hearing audio will be streamed live on our website via the "Listen to the live hearing!" link at: <https://www.dmr.nd.gov/oilgas/docketindex.asp>

The Commission will also accept and consider written comments on the merits of the application and draft permit if received no later than 5:00 pm CDT November 1, 2021. Submit written comments to the Oil and Gas Division, 1016 East Calgary Avenue,

Bismarck, North Dakota 58503-5512 or brkadrmass@nd.gov.

If you wish to present testimony by telephone, you may do so pursuant to NDAC Section 43-02-03-88.2:

43-02-03-88.2. HEARING PARTICIPANTS BY TELEPHONE. In any hearing, the

commission may, at its option, allow telephonic communication of witnesses and interested

October 26, 2021

Oil & Gas Division
1016 East Calgary Avenue
Bismarck, North Dakota 58503-5512

Re: Draft Storage Facility Permit: Minnkota Power Cooperative, Inc. Case #-29032 (Black Island and Deadwood) Applicant has failed to comply with North Dakota Century Code Chapter (NDCC) 38-22 and North Dakota Administrative Code (NDAC) Chapter 43-05-01 for a carbon dioxide storage facility permit.

Director Helms,

Thank you for the opportunity to make comments about the above reference case before the North Dakota Industrial Commission. Upon review of the Draft Storage Facility Permit, Minnkota Power Cooperative Inc. (Minnkota) permit application does not comply with North Dakota State law requirements (NDCC) 38-22 and (NDAC) 43-05-01 for safe long-term storage of CO₂ by the sequestration method and there is potential for leakage of the CO₂ from the injection formation (Black Island / Deadwood). Failure of the CO₂ Storage Facility could allow for contamination of the near surface fresh-water aquifers and surface water features.

Technical data presented by Minnkota to the North Dakota Industrial Commission reveal incomplete evaluation of geological data, engineering data and 2-D & 3-D geophysical data to properly assess and characterize the confinement formation (Icebox) and injection formations (Black Island / Deadwood) and lower confinement formations as described in their permit application. Additional failure to comply requirements are specified below and are addressed in this letter.

Within the application Minnkota states in 2.2.2.6 (Seismic Survey) "A 5-mi-long seismic source test and 6.5-mi² 3D seismic survey were acquired in 2019, and a 12-mi² 3D seismic survey and 21 mi of 2D seismic lines were acquired in 2020 (Figure 2-6). The 3D seismic data allowed for visualization of deep geologic formations at lateral spatial intervals as short as tens of feet. The 2D seismic data provided a means to connect the two 3D seismic data sets and ensure consistent interpretation across the Tundra SGS area. The seismic data were used for assessment of the geologic structure, interpretation of interwell heterogeneity, and well placement. Data products generated from the interpretation and inversion of the 3D seismic data were used as inputs into the geologic model. Additionally, the geologic model that was informed by the seismic data was used to simulate migration of the CO₂ plume. These simulated CO₂ plumes were used to inform the testing and monitoring plan (Section 4).

The 3D seismic data and J-LOC1 and J-ROC1 well logs were used to interpret surfaces for the formations of interest within the survey area. These surfaces were converted to depth using the time-to-depth relationship derived from the J-LOC1 and J-ROC1 sonic logs. The depth-converted surfaces for the storage reservoir and upper and lower confining zones were used as inputs for the geologic model. These surfaces captured detailed information about the structure and varying thickness of the formations between wells. Interpretation of the 3D seismic data suggests there are no major stratigraphic pinch-outs or structural features with associated spill points in the Tundra SGS area. No structural features, faults, or discontinuities that would cause a concern about seal integrity in the strata above the Deadwood Formation extending to the deepest USDW, the Fox Hills Formation, were observed in the seismic data."

Minnkota have spent over \$1 million dollars on acquisition and processing of 2-D and 3-D seismic data in 2019 and 2020 over the proposed storage facility area, CO₂ injection well and monitor wells. Yet, Minnkota fail to display any geophysical maps (structure maps or isopach maps of the cap rock and containment formations) constructed and calibrated with existing well data for any subsurface formations. Why? Minnkota states above (2.2.2.6) they constructed data products from seismic interpretations utilized for modeling. It is imperative for

the commission to review such geophysical data, interpretations and maps to fully understand the geological setting across the Storage Facility area and the proposed injection site location to ensure the cap-rock and containment formations do not have faults which breach both and would allow for CO2 to escape and contaminate fresh-water aquifers.

Minnkota failed to display any 2-D or 3-D seismic data (Figure #2-6) from the surface to the basement (Precambrian) within the storage facility area and AoR in support of their CO2 storage permit application. One wonders why spend over \$1 million dollars, complete required work and then not display final products in support of the CO2 storage facility permit application. No 3-D seismic lines which directly tie the proposed injection well were depicted to the Commission in support of the CO2 storage application. Four 2-D seismic lines were acquired and processed which directly tie the proposed injection well yet once again none of this data is utilized in support of the CO2 storage facility permit application and depicted for the Commission. Additional 2-D seismic legacy data is available within the storage facility area.

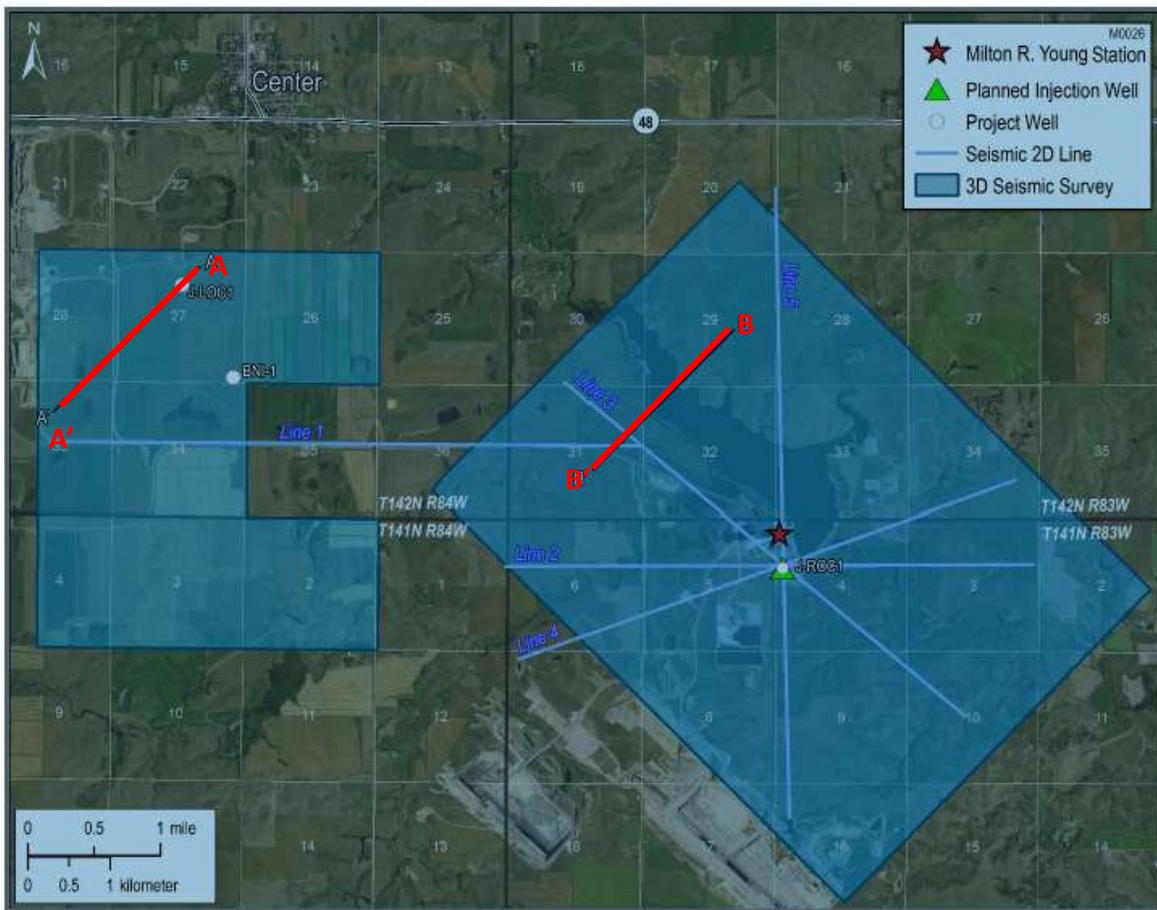


Figure 2-6. Map showing the 2D and 3D seismic surveys in the Tundra SGS area.

Minnkota have displayed (Figure #2-7) partial lines (250'-400' of data out of over 9000' of data) from two different 3-D seismic impedance volumes which only depict the Icebox (cap rock) formation and the Black Island / Deadwood Formations (injection zone). Minnkota select one partial data line over the proposed monitor well and another partial data line which is approximately one mile from the proposed injection well location from the 3-D seismic volumes. Utilizing the limited amount of impedance 3-D seismic data presented in support of the CO2 storage facility permit application allows for one to interpret several faults within the Icebox and Black Island / Deadwood (injection zone) formations. Applicant states above an evaluation has been completed from Deadwood to fresh-water aquifers. 3-D seismic data and interpretations displayed to the Commission are

incomplete and lack technical merit for the Commission to make a reasonable evaluation of the CO2 storage container (Storage Facility area) integrity. One can clearly depict near vertical faults within the Icebox and Black Island / Deadwood formations utilizing applicant's 3-D impedance seismic data.

Applicant indirectly accepts a much higher degree of risk (trust me) for CO2 storage facility failure of the cap-rock and injection formations by withholding critical scientific data. The Commission should not allow the State of North Dakota to accept additional risk of a CO2 storage facility containment failure.

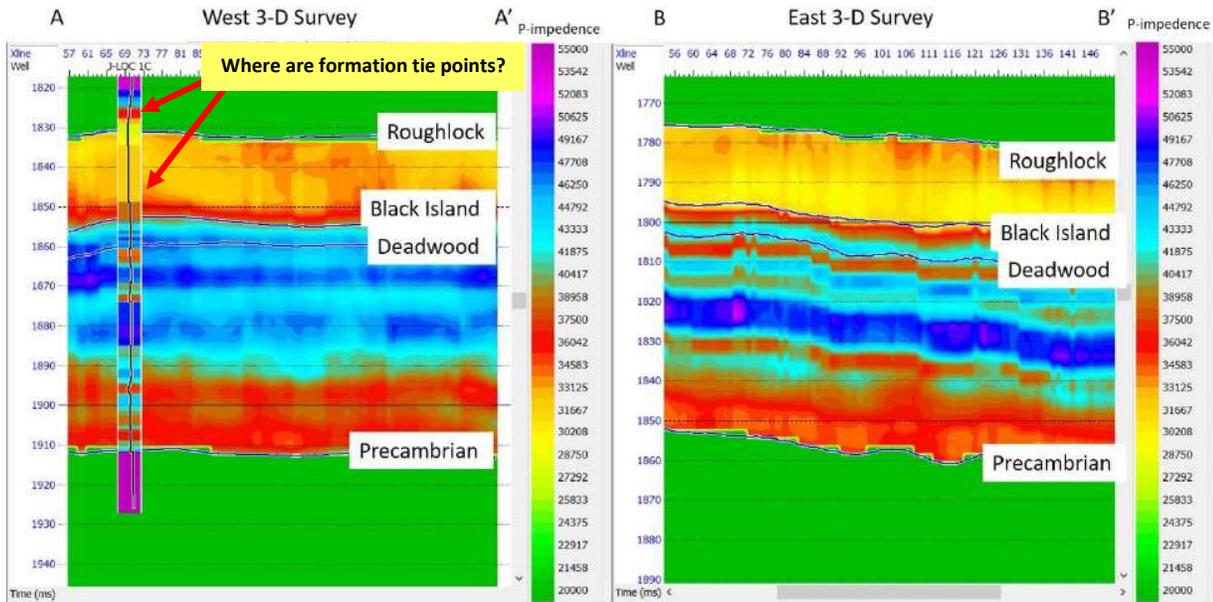


Figure 2-7. Left: cross section of the inverted acoustic impedance volume for the western seismic 3D survey that transects the J-LOC1 well. The acoustic impedance log calculated from the J-LOC1 sonic and density logs is shown on the inset panel. Right: cross section of the inverted acoustic impedance volume for the eastern 3D survey.

Figure 2-7

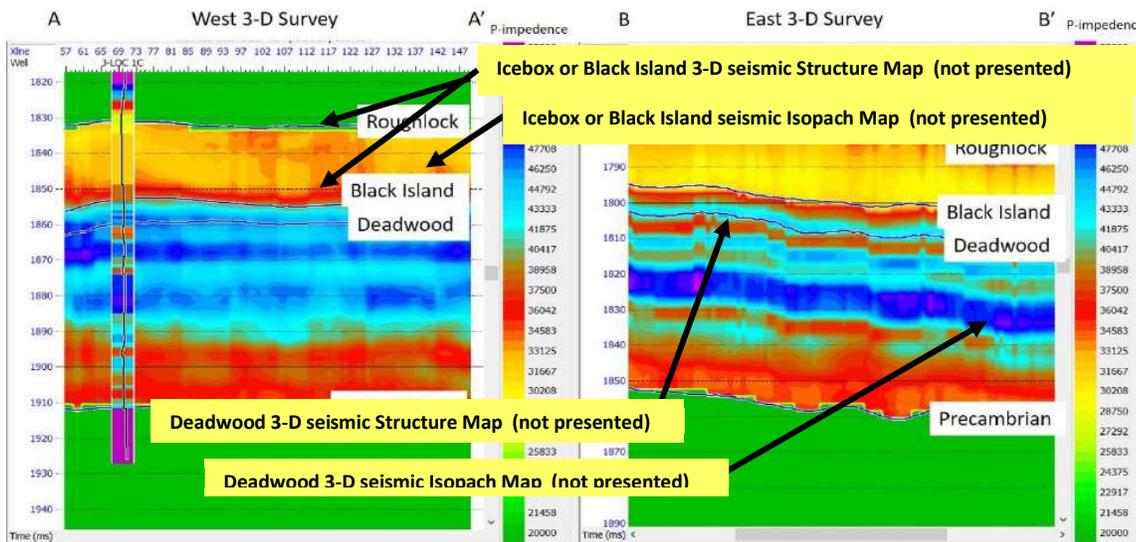


Figure 2-7. Left: cross section of the inverted acoustic impedance volume for the western seismic 3D survey that transects the J-LOC1 well. The acoustic impedance log calculated from the J-LOC1 sonic and density logs is shown on the inset panel. Right: cross section of the inverted acoustic impedance volume for the eastern 3D survey.

Figure 2-7(a)

(Figure 2-7) is 3-D impedance seismic data depicted in the Minnkota permit application. Figure 2-7(a) highlighted in yellow text depicts data (maps) which should have been included in support of the CO2 storage permit application. This data is required to effectively evaluate the storage facility area and integrity. Without this data,

the North Dakota Industrial Commission will be making a CO2 storage facility permit decision based solely on subsurface well control data. Why acquire 2-D and 3-D seismic data?

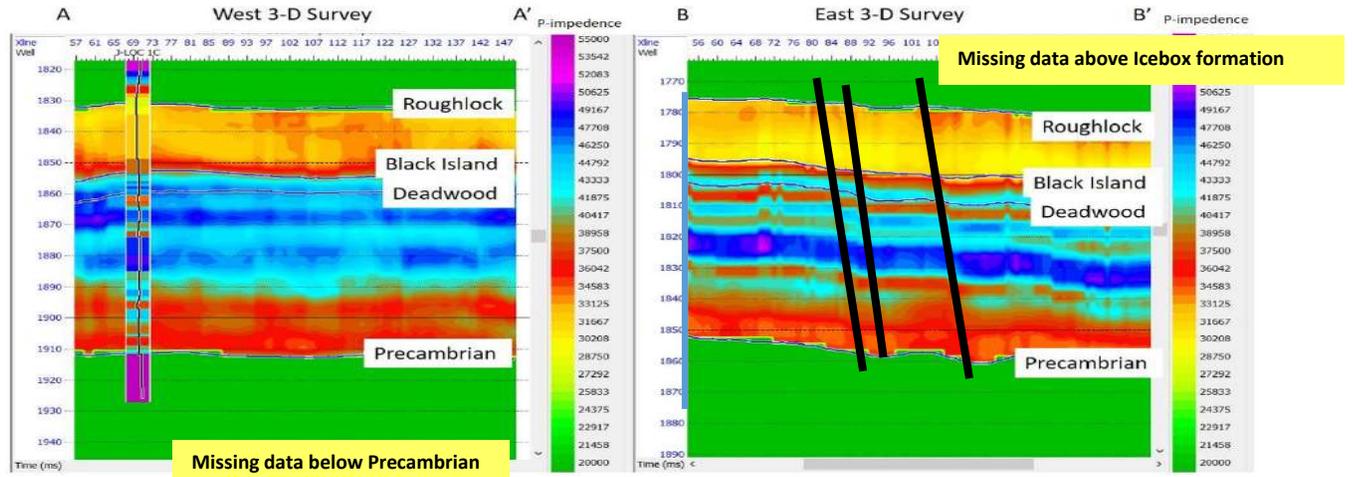


Figure 2-7. Left: cross section of the inverted acoustic impedance volume for the western seismic 3D survey that transects the J-LOC1 well. The acoustic impedance log calculated from the J-LOC1 sonic and density logs is shown on the inset panel. Right: cross section of the inverted acoustic impedance volume for the eastern 3D survey.

Figure 2-7(b)

(Figure #2-7)(b) Interpretation of the limited 3-D impedance lines depicts several near vertical faults within the Deadwood formation. Faults are almost vertical which are typical for the Williston Basin. The faults depicted in Figure 2-7(b) appear to breach the cap-rock formations. Note: one can also see vertical display issues within the Deadwood Formation which may be caused by scaling (zoom in) of the 3-D impedance seismic data for this CO2 storage facility permit application. All 3-D seismic data above the Icebox formation and below the Deadwood formation have been removed. Why? Why not be transparent? Covering up data (green) from a permit application leads to suspicion of applicant's interpretations of data.

Applicant projects a direct well tie via synthetic seismogram on Figure #2-7 (west 3-D seismic survey) as previously stated. No formation tops are displayed on the synthetic trace from well log data for the J-LOC-1. Where is the top and base of the Icebox and Black Island / Deadwood formations displayed on the synthetic seismogram? One could ask from the amount of data displayed, is this the Icebox and Deadwood formations? Applicant has not proven the seismic data displayed is the top and base of the Icebox, Black Island and Deadwood formations. One can see seismic frequencies of the synthetic trace are much higher than the actual 3-D seismic data displayed and are not an exact seismic tie and can lead to mis-ties of both 2-D and 3-D seismic data. Thus, incorrect interpretations.

No 3-D seismic data and synthetic seismogram ties from the J-ROC1 wellbore are depicted in the permit application. Data quality at the J-ROC1 is probably poor which does not allow for a direct synthetic seismogram tie of the 3-D seismic data. Well log data from the J-ROC-1 and J-LOC-1 depict different stratigraphy at the top of the Deadwood formation. Is the data displayed in Figure #2-7 the Black Island / Deadwood formations?

This permit application also indicated \$100,000 dollars per sq. mi. (\$3.0-\$4.2 million) will be required for a new larger 3-D seismic survey within the AoR to monitor the CO2 plume for this potential CO2 storage facility site. Why budget money if one has no intention to display data, interpretations, and results?

A previous final report "North Dakota Integrated Carbon Storage Complex Feasibility Study" which was funded and completed by the Department of Energy concerning this same potential storage facility area as a multiple formation injection and containment site for CO2 storage have figures which are depicted below. No geophysical maps or 3-D seismic lines were depicted in that 285-page report. The report depicted two unidentified time

slices. First (Figure A-5, Page # 74) which is displayed below. The Figures are displayed to inform the Commission of how some data can be interpreted differently and what is stated may not necessarily be correct.

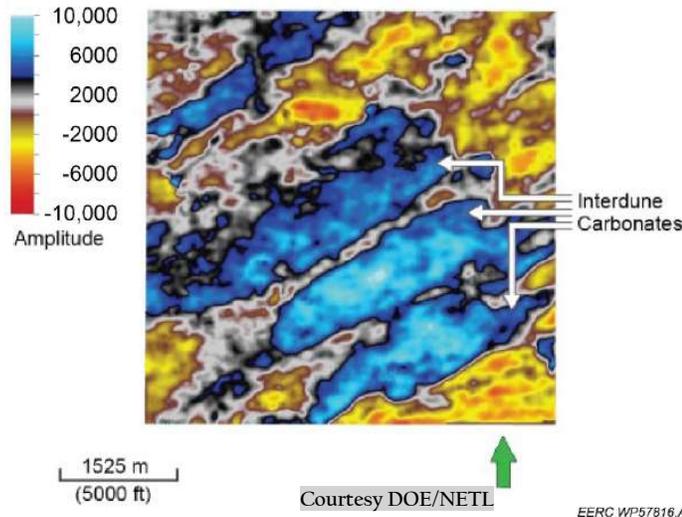


Figure A-5. Map view of seismic amplitude time slice through the Broom Creek Formation with interpreted geobodies. High amplitude values (blue) caused by thin bed tuning indicate the presence of interdunal carbonates.

Figure A-5 (above) depicts a timeslice from the above mentioned report. Figure A-5 states “Map view of seismic amplitude time slice through the Broom Creek Formation with interpreted geobodies. High amplitude values (blue) caused by thin bed tuning indicate the presence of interdunal carbonates”. That statement is incorrect and does not indicate the blue amplitude are interdunal carbonates.” Thin bed tuning relates to the ability of seismic data to resolve the top and base of a seismic event. (Figure #1) As the thickness between the top and base decrease (formation or geologic feature) the seismic character (trough to peak or peak to trough) will not be able to resolve top and base thickness (thus below tuning thickness). One must have an existing well (none depicted in figure) with a sonic log and porosity logs directly tied to each seismic event to justify that statement. A more reasonable interpretation is the positive amplitude events (blue) depicted are a shale/siltstone within the Deadwood formation and the amplitude scale varies (stratigraphy) within the formation which makes it appear there are three separate geologic features, when in fact it is one formation or geologic feature. The 4th blue amplitude featured in figure A-5 is not defined as an interdunal carbonate.

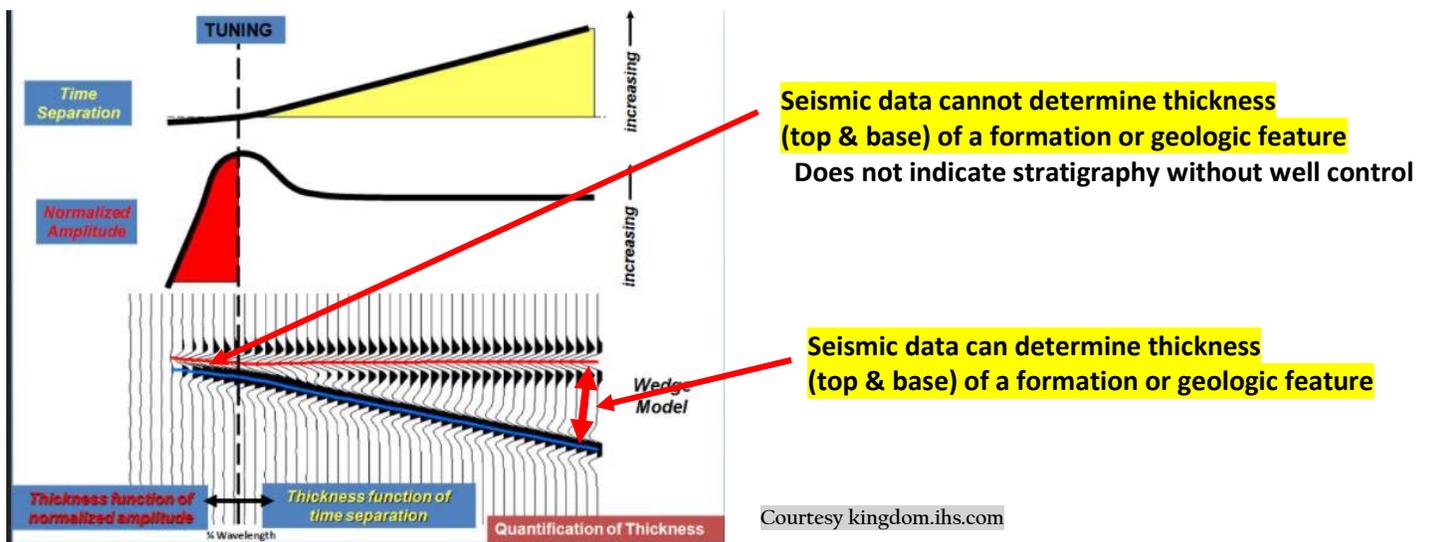
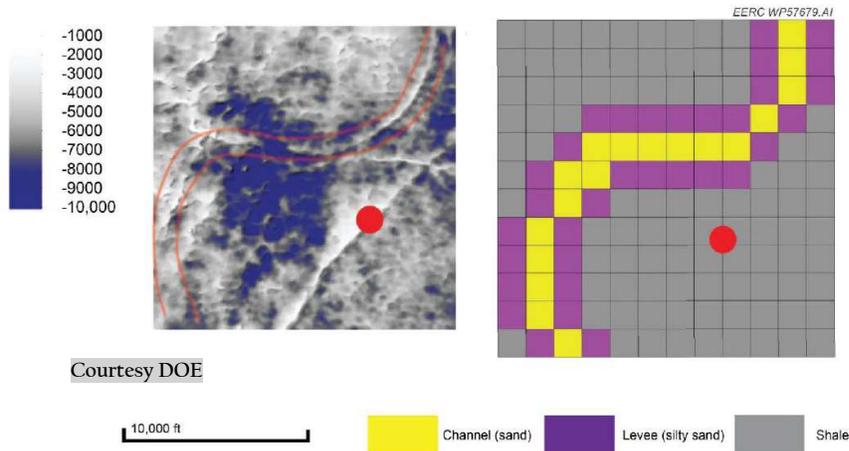


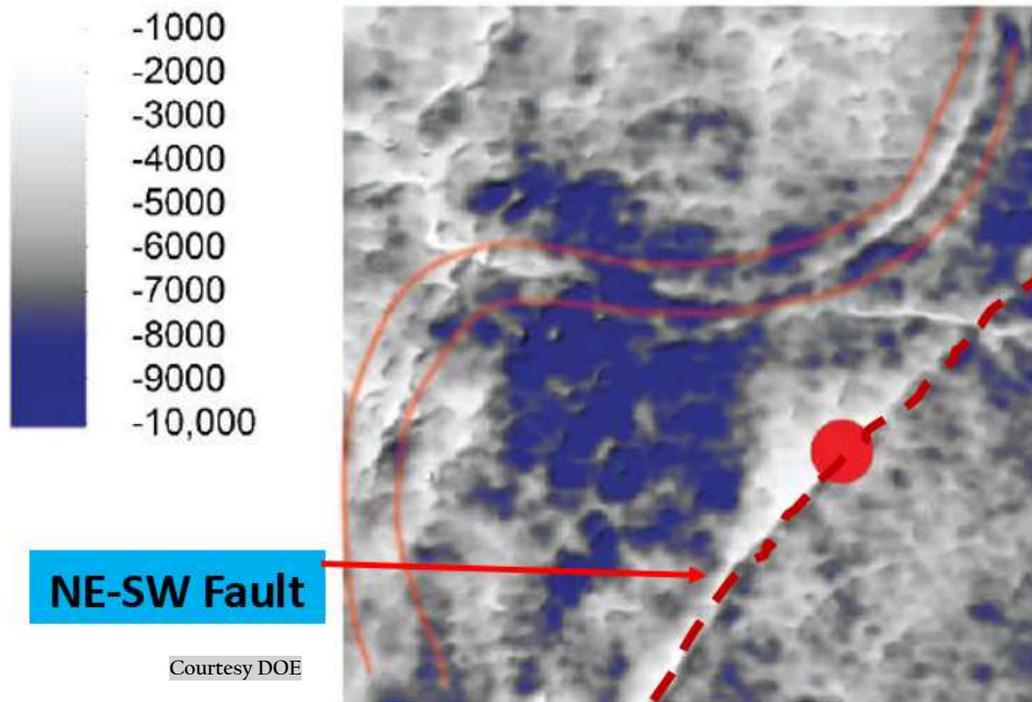
Figure #1 (Seismic Tuning Model)

Courtesy kingdom.ihs.com



Courtesy DOE

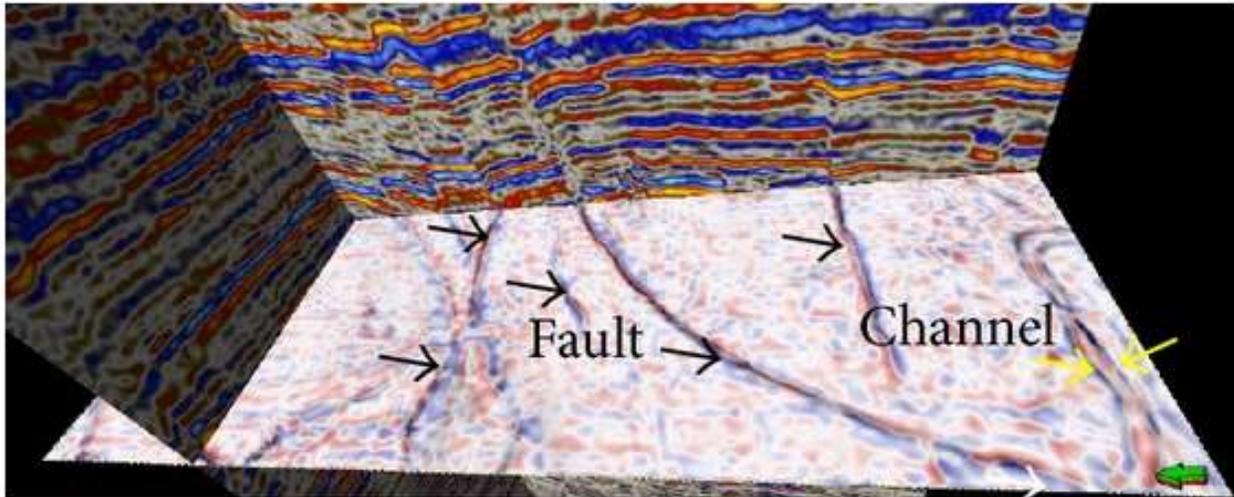
Figure B-10. Left: Map view of seismic amplitude time slice through the Inyan Kara Formation with interpreted channel feature. Right: Training image. The Flemmer-1 wellsite location is represented by a red dot.



Courtesy DOE

Figure B-10(a)

Figure B-10 Page #114 (above) is another time slice from the report “North Dakota Integrated Carbon Storage Complex Feasibility Study” which depicts the location of the Flemmer #1 (monitor well) near the AVS-GPSP storage site. Figure B-10(a) A partial interpretation of the same time slice clearly depicts a fault with a NE to SW orientation adjacent to the Flemmer-1 wellbore. The features within the orange boundaries appear to be additional faults and are not a channel feature as stated. Channel feature can usually be distinguished by a contrast from the outer edges (overbank-channel area) of a channel, not from the middle as has been suggested while viewing time slice data. How can the middle of a channel contrast (same rock- stratigraphy)? One can also see stripping effects (acquisition footprint) within this 3-D seismic data set. 3-D seismic data examples are utilized to demonstrate the effectiveness of proper interpretation of 3-D seismic data can reduce storage containment failure risk.



Courtesy researchdate.net

Figure B-11

Figure B-11 (channel example) depicts a combination of a 3-D vertical seismic line with an associated time slice. This figure was included to demonstrate to the Commission one can identify both faults and channels utilizing existing 3-D seismic data. Note, the channel displayed on the time slice is recognized by the overbank-channel contrast as previously stated. Also, both positive and negative amplitudes are demonstrated in this example. Note the faults have zero amplitudes (white) depicted, are in the middle of a fault.

Department of Energy (DOE) have utilized time slice data for past CO₂ projects. An article published by DOE in 2013 "Time-lapse surface seismic inversion with thin bed resolution for monitoring CO₂ sequestration: A case study from Cranfield, Mississippi" depicts several time slices. Figure #3 (below) from the article depicts four time slices of the Tuscaloosa injection zone across the entire 3-D seismic survey. The first time slice being pre-injection of CO₂, the second post injection of CO₂. One can easily recognize the difference in the seismic data from CO₂ as stated in the article. Additionally, one can easily recognize at least one major fault within the AoR. The fault trends in a northwest to southeast orientation. Figure #4(a) from the article depicts a portion of the inline from the 3-D seismic survey. The inline extend the entire length of the 3-D seismic survey. Note the fault can clearly be recognized on inline 1102.

Figure # 5 (below) is a comparison of the amount of 3-D seismic data the applicant has given the Commission to evaluate this CO₂ storage facility permit. Only the Tuscaloosa (injection zone) formation is depicted in Figure #5.

One can assume 3-D seismic data quality around the injection well is probably poor as there is a lake adjacent to the proposed CO₂ injection well and within the storage facility area. Without proper undershooting (acquisition) of the lake a large data gap at the surface will be observed on the 3-D seismic data volume. This surface data gap will affect all 3-D seismic data quality under the lake and near the lake in the subsurface 3-D seismic data volume. Figure #8 below depicts similar large surface data gaps on the seismic line displayed.

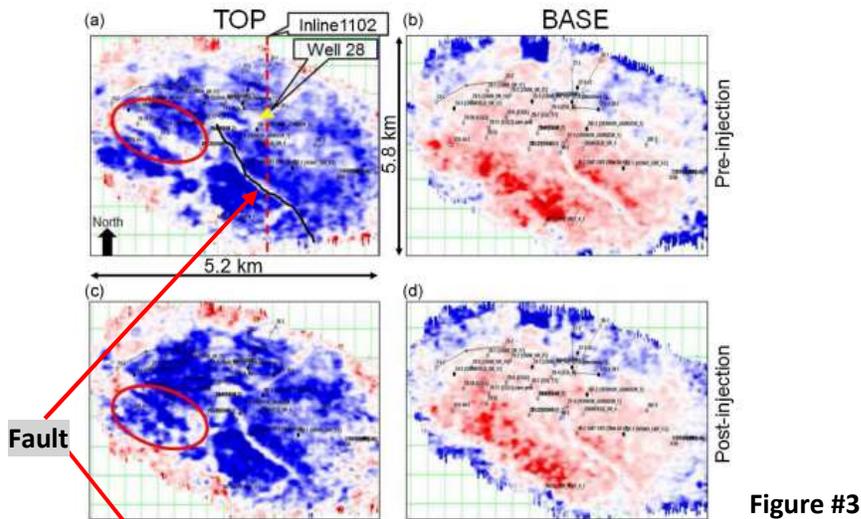


Figure #3

Fig. 3. Time-lapse seismic amplitude data at top and base of injection interval. (a) and (b) The top and base slices at pre-injection conditions; (c) and (d) The top and base slices post-injection. (For interpretation of the references to color in this citation of figure the reader is referred to the web version of the article.)

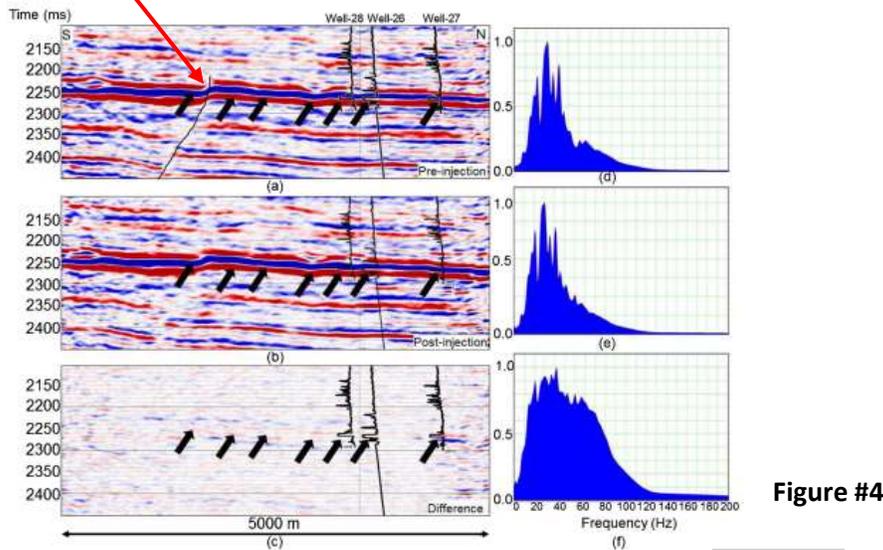


Figure #4

Fig. 4. Cross-sections along inline-1102 are shown for (a) pre-injection amplitudes, (b) post-injection amplitudes, and (c) differences. Frequency spectra, (d) pre-injection, (e) post-injection, and (f) difference are shown in the right column. The injection interval is marked by the black arrows.



Figure #5

Courtesy DOE

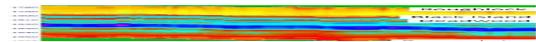


Figure #6

Figure #5 depicts only the top and base of the Tuscaloosa injection zone (no scale change from Figure 4(a)) from inline 1102. Most of the data from Figure #4(a) have been removed to depict Figure #5

Figure #6 depicts one of the 3-D impedance lines (Figure 2-7 (B-B')) taken from the applicant's storage facility permit application with a similar scale for appearance and comparison to Figure #5. It is impossible for the Commission to evaluate the cap-rock and injection formations integrity of the storage facility area from this limited amount of data. Applicant depicts less than 3.1% of actual data of one strike line from the 3D seismic survey. 96.9% of the seismic line depicted in Figure 2-7 is missing.

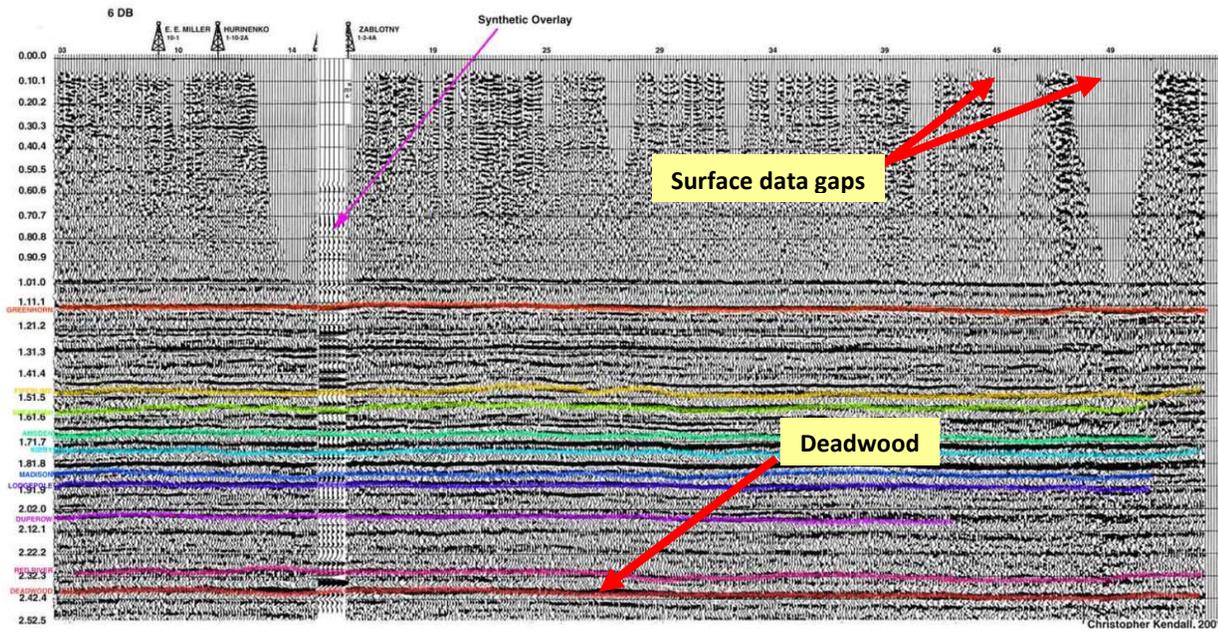


Figure #8 (Little Knife Oil Field: 2-D seismic line in Williston Basin)

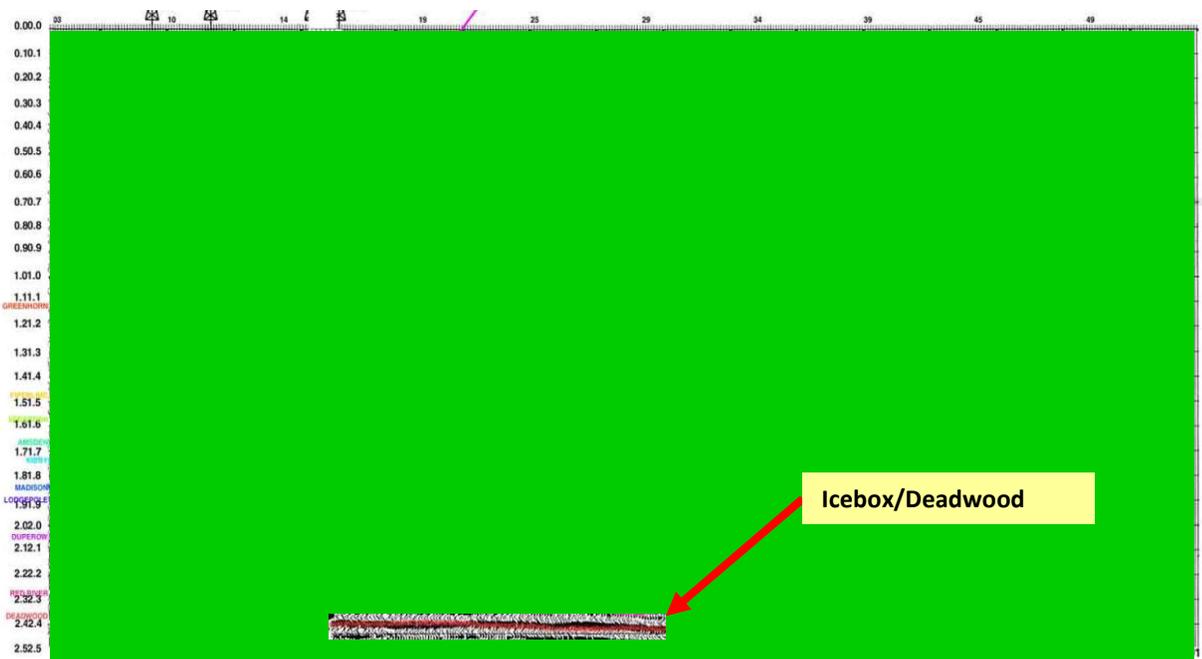


Figure #8a (Little Knife Oil Field: 2-D seismic line in Williston Basin, displayed with missing data similar to Minnkota Storage Facility permit application)

Figures #8 and #8a depict a Gulf Oil Company seismic line over Little Knife Field located in the Williston Basin which has been published several times. Figure #8 depicts the entire 2-D seismic line. Figure #8a demonstrates the same amount of seismic data Minnkota depicts in the Storage Facility permit application. Applicant has denied the Commission the opportunity to review and evaluate 2-D and 3-D seismic data acquired and processed specifically for this CO2 storage facility permit application.

Applicant should display several strike lines, dip lines and arbitrary lines from the 3-D seismic volumes which display normal migrated (black and white wiggle trace filled) seismic data from surface to well below the Precambrian formation in support of this CO2 storage storge facility permit application. Several lines should

directly tie the proposed injection and monitor wells, Additionally, applicant could also display several time slices of the 3-D volume from 1.00 seconds to 1.40 seconds (20 msec intervals) wherein the Commission can have confidence the cap rock (Icebox/Black Island) and injection (Deadwood) formations are free of any faults which might breach the formations and allow CO2 to escape and contaminate freshwater aquifers.

All 2-D seismic data could also be displayed from surface to below the Precambrian formation with the CO2 storage facility permit application. By including critical geophysical data requested above the Commission and public would have a higher degree of confidence of CO2 containment in the proposed CO2 storage facility area.

Applicant has utilized Department of Energy funds to characterize the proposed Tundra (CarbonSAFE III) CO2 storage facility. Therefore, all data (including all geologic well data, 2-D and 3-D geophysical data, reports, simulations, etc.) are of public record and can be obtained by any United States citizen. The eastern 3D seismic survey and all 2-D seismic lines are not proprietary (funding by DOE). The western 3-D seismic survey appears to be licensed but can be released to North Dakota government officials per the 3-D seismic license agreement. Applicant has yet to deposit any G&G data (well log, maps, seismic data, reports, simulations, etc.) from this research project into the EDX (Energy Data Exchange) repository operated by DOE/NETL for peer review and exchange of ideas.

Additionally, applicant has failed to address the Linear Geologic Surface Feature (Figure #9 & Figure #10) which is within the 3-D seismic survey outline, proposed CO2 Storage Facility area and the AoR, approximately 1.2 miles from the proposed CO2 injection well. Linear geological surface features are usually associated with subsurface faults. Several Linear Geologic Surface Features are depicted on the North Dakota State Government website (nd.gov/gis/apps/HubExplorerV2/) within the AoR. Applicant has stated no faults are present within the storage facility area and AoR. A linear geologic surface feature could have a large subsurface fault(s) which potentially fault fresh-water aquifers and extend several thousand feet below the surface.

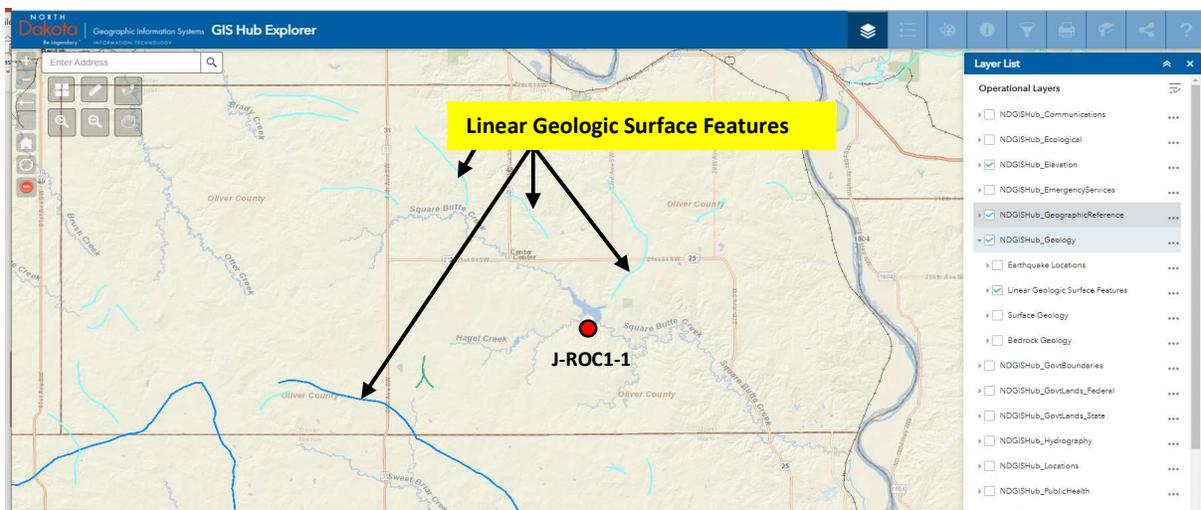


Figure #9 Linear Geologic Surface Features

Additionally, (Figure #10) depicts existing 2-D seismic data over the proposed storage facility area which has not been depicted in this CO2 Storage Facility Permit application. Several long regional 2-D seismic lines were probable licensed for the evaluation of this storage facility permit at the inception of this CO2 Sequestration project. This figure (#9) also depicts the approximate location of the storage facility area and 3-D seismic survey locations along with the location of the linear geologic surface feature. This existing 2-D seismic data would be extremely important to assist the Commission in determining the vertical and horizontal extent of the Deadwood

storage facility area. Applicant could also depict the full migrated 2-D migrated seismic lines previously licensed to the Commission for review.

Existing 2-D seismic data (Legacy) locations

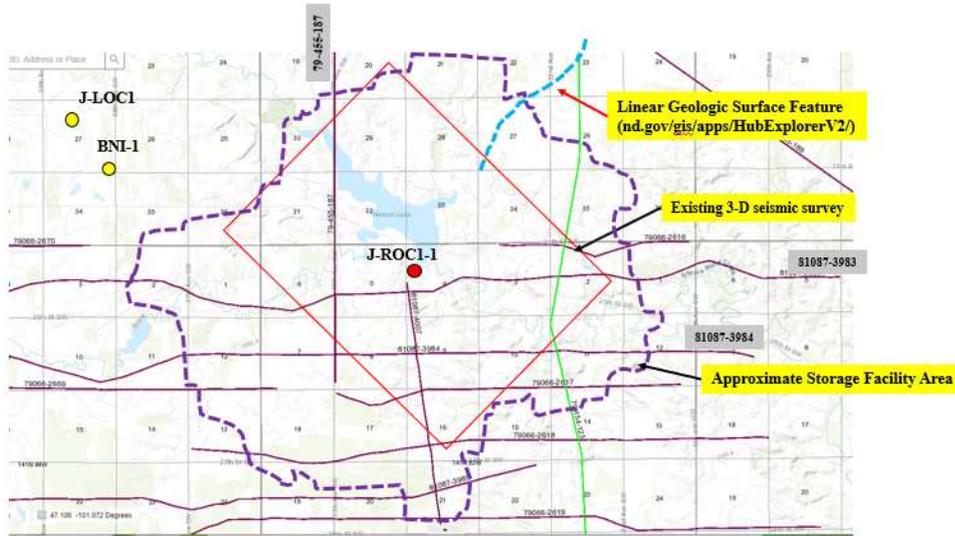


Figure #10: Base map depicts existing 2-D seismic data over CO2 storage facility area

Applicant may have licensed an existing regional 2-D seismic line (81087-3983) which is an east-west line located approximately 2200' south of the J-ROC1-1 wellbore and within the Storage Facility area and the AoR. This line extends over five miles east and five miles west of the proposed CO2 injection well. Applicant has not mentioned or displayed this line in the CO2 Storage Facility Permit application. This line is required to assist in characterization of the CO2 Storage Facility area and the AoR in an east-west direction. Additional existing 2-D seismic data may also have been licensed by applicant within the Storage Facility area and AoR and are not depicted for this CO2 Storage Facility Permit application. If available from applicant, this data could be useful to fully evaluate the Storage Facility area and AoR for potential regional and localized faults.

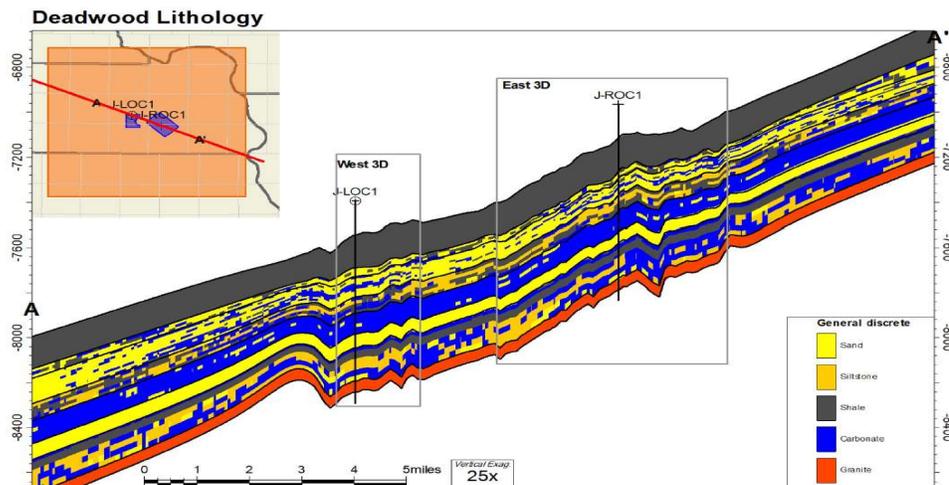


Figure 2-14. Cross section of the Tundra SGS CO₂ storage complex from the geologic model showing lithofacies distribution in the Deadwood Formation. Depths are referenced to mean sea level.

Figure 2-14

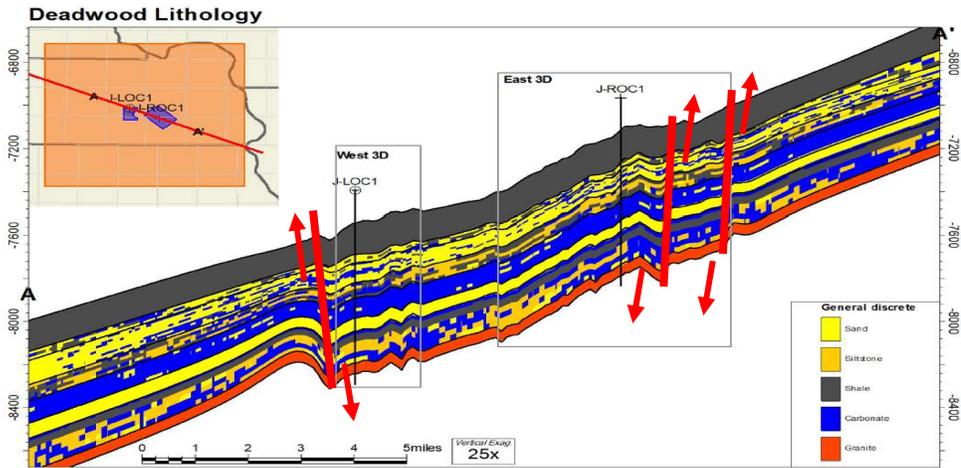


Figure 2-14. Cross section of the Tundra SGS CO₂ storage complex from the geologic model showing lithofacies distribution in the Deadwood Formation. Depths are referenced to mean sea level.

Figure 2-14(a): Applicant Lithofacies Distribution Model

Figure 2-14(a) depicts applicant's lithofacies distribution cross section with interpreted faults. Faults appear to be associated with 2-D and 3-D seismic interpretations not depicted in the permit application. Faults could easily extend much higher in the section as Precambrian is below the Deadwood and Icebox formations. Faults could be associated linear basement features.

Pursuant to NDCC 38-22 (Carbon Dioxide Underground Storage) and NDAC 43-05-01 (Geologic Storage of Carbon Dioxide) applicant has not presented all technical work required for the North Dakota Industrial Commission to make a comprehensive decision on the storage facility area and integrity from the CO₂ Storage Facility Permit Application. Applicant has withheld vital geologic and geophysical data, incorrectly displayed geologic and geophysical data, or did not acquire geological and geophysical data required in the permit application which could reduce the risk of a CO₂ storage facility failure.

Applicant has failed to comply with (NDCC) 38-22-08 permit requirements as follow:

38-22-08(1) That the storage has complied with all requirements set by the commission

1. Applicant has failed to provide and depict all characterization interpretations and correct detailed seismic data and interpretations, geologic/geophysical maps, and cross sections for a comprehensive evaluation of the CO₂ storage facility permit application as required by the State of North Dakota and the Commission.
2. Applicant has failed to acquire MDT, FMI or QuantaGeo logs at the proposed injection wellbore (J-ROC1) location or within the CO₂ storage facility area as required by the State of North Dakota.
3. Applicant has failed to address a Linear Geologic Surface Feature within the proposed Storage Facility area which usually indicate the presence of subsurface faults as required by the State of North Dakota.

38-22-08(2) That the storage facility is suitable and feasible for carbon dioxide injection and storage

1. Applicant has not demonstrated the storage facility is suitable and feasible for carbon dioxide injection and storage by withholding critical geological/geophysical maps and both 2-D and 3-D seismic data (strike lines, dip lines, arbitrary lines, time slices, etc.) for interpretation and inspection by the State of North Dakota and the Commission. As depicted above, strike lines, dip lines, arbitrary

lines and time slices of 3-D seismic volumes can easily verify the presence of faults (storage containment failure) within the Storage Facility area. Figure #2-7(b) depicts several interpreted faults within the Icebox formation (cap rock) and Black Island / Deadwood formations (injection zone) from the existing 3-D seismic data set.

2. Applicant failed to run MDT logs over the confinement formation and injection formation or any other formation at the proposed injection well location (J-ROC1) or within the Storage Facility area. Applicant does not have any Microfracture in situ stress tests from the J-ROC1 wellbore and cannot determine formation pressures, high quality fluid samples and permeability anisotropy within the Storage Facility area as required by the State of North Dakota and the Commission. Applicant projects incomplete MDT data from a wellbore located over 4.5 miles (outside the proposed storage facility area) from the proposed CO₂ injection wellbore (J-ROC1) wherein geologic conditions (depth, stratigraphy, structure, dip rates, pressure, etc.) have changed above the cap rock formations, within the cap rock formations, within the injection formation and below the injection formation. Applicant has failed to demonstrate the storage facility is suitable and feasible for carbon dioxide injection and storage.
3. Applicant failed to run an FMI or QuantaGeo log in the proposed injection wellbore (J-ROC1) which can demonstrate faults and fractures above the cap rock formations, within the cap rock formations, within the injection formation and below the injection formations. Applicant has failed to demonstrate the storage facility is suitable and feasible for carbon dioxide injection and storage.

38-22-08(8) That carbon dioxide will not escape from the storage reservoir.

1. Applicant has withheld detailed structure and isopach maps of the confining and injection formations constructed from existing 2-D and 3-D seismic data from the CO₂ storage facility permit application. This data can be directly calibrated to geological well data from the proposed injection well. Additionally, applicant has withheld 2-D and 3-D seismic data (lines, time slices, etc.) from the Commission and public. Applicant states no faults are present in the AoR area but do not provide any evidence to the Commission to support such statement. Figure 2-7(b) clearly depicts several interpreted faults within the Storage Facility area and contrast with applicant's statement. Applicant could easily provide such evidence to support their statement by making several in-lines, cross lines, and arbitrary lines from the migrated 3D seismic volume (surface to below Precambrian) to the Commission. Applicant could also display time-slices from above the cap-rock formations (Icebox) through the injection formation (Black Island / Deadwood) at 20 msec. intervals utilizing the entire 3D seismic volumes. This data is required to confirm that carbon dioxide will not escape from the storage reservoir within the Storage Facility area. Applicant has failed to confirm from all geologic, geophysical, and engineering data that carbon dioxide will not escape from the storage reservoir.
2. Applicant failed to run MDT logs over the confinement formation and injection formation or any other formation at the proposed injection well location (J-ROC1) or within the Storage Facility area. Applicant does not have any Microfracture in situ stress tests from the J-ROC1 wellbore and cannot determine formation pressures, high quality fluid samples and permeability anisotropy within the Storage Facility area as required by the State of North Dakota. Applicant projects incomplete MDT data from a wellbore located over 4.5 miles (outside the proposed storage facility area) from the proposed CO₂ injection wellbore (J-ROC1) wherein geologic conditions (depth, stratigraphy, structure, dip rates, pressure, etc.) have changed above the cap rock formations, within the cap rock formations, within the injection formation and below the injection formation. Applicant has failed to confirm from all geologic, geophysical, and engineering data that carbon dioxide will not escape from the storage reservoir.

3. Applicant failed to run an FMI or QuantaGeo log in the proposed injection wellbore (J-ROC1) which can demonstrate faults and fractures within the cap rock formations and injection formation within the Storage Facility area. Applicant has failed to confirm from all geologic, geophysical, and engineering data that carbon dioxide will not escape from the storage reservoir.

38-22-06(10) That the storage facility will not endanger human health nor unduly endanger the environment.

1. Applicant's permit application clearly has a higher degree of containment failure risk as stated above which will clearly endanger human health and endanger the environment (permanent contamination of fresh-water aquifers and surface water ponds, lakes, streams). Faults within confinement and injection zones.
2. Applicant has not addressed Linear Geologic Surface Features (which are usually associated with faults) within the CO2 Storage Facility area and the AoR. Surface/Near-surface fault(s) could extend downward through fresh-water aquifers into deeper formations. CO2 could escape confinement and travel through a series of faults to fresh-water aquifers and surface water (lakes, streams, etc.). If CO2 escapes and makes its way to the surface it will collect in surface sink areas and could potential kill all human and wildlife within surface sink areas.

38-22-08(11) That the storage facility is in the public interest.

1. At present the applicant's CO2 storage permit application is not in the public interest as the risk of CO2 storage facility containment failure clearly outweighs the removal of CO2 from the atmosphere. Applicant has failed to provide and depict all characterization data, interpretations, and maps for a comprehensive evaluation by the State of North Dakota and Commission of the CO2 storage facility area and AOR.

38-22-08(12) That the horizontal and vertical boundaries of the storage reservoir are defined. These boundaries must include buffer areas to ensure that the storage facility is operated safely and as contemplated.

1. Applicant has not demonstrated the storage reservoir has been defined. As previously stated, the vertical boundaries have not been determined directly over the proposed Injection wellsite, storage facility area and a substantial portion of the AoR (storage reservoir). Applicant has withheld critical geological/geophysical maps and both 2-D and 3-D seismic data for interpretation and inspection by the State of North Dakota and Commission. Applicant has not demonstrated accurate detailed structure maps and isopach maps of the cap-rock formations (Icebox) and injection formations (Black Island / Deadwood) which define the vertical and horizontal extent of the potential CO2 storage reservoir. Applicant has not depicted any seismic data (2-D or 3-D) which depicts both the cap rock formation and the injection formation in this application. Applicant has only depicted maps constructed from existing well control for the horizontal and vertical boundaries of the storage reservoir. Applicant has not addressed interpreted faults depicted in Figure 2-7(b). Applicant has not defined the horizontal and vertical boundaries of the storage reservoir utilizing all existing and required scientific data.
2. Applicant failed to run MDT logs over the confinement formation and injection formation or any other formation at the proposed injection well location (J-ROC1) or within the Storage Facility area. Applicant does not have any Microfracture in situ stress tests from the J-ROC1 wellbore and cannot determine formation pressures, high quality fluid samples and permeability anisotropy within the Storage Facility area as required by the State of North Dakota. Applicant projects incomplete MDT data from a wellbore located over 4.5 miles (outside the proposed storage facility area) from the

proposed CO₂ injection wellbore (J-ROC1) wherein geologic conditions (depth, stratigraphy, structure, dip rates, pressures, etc.) have changed above the cap rock formations, within the cap rock formations, within the injection formation and below the injection formation. Without formation pressure data applicant cannot defined the horizontal and vertical boundaries of the storage reservoir as required by the State of North Dakota.

Applicant has failed to comply with NDAC (43-05-01)(C-4) Geologic Exhibits i. Structural and stratigraphic cross sections that describe the geologic conditions at the storage reservoir.

3. Applicant has failed to depict accurate well log cross sections which depict the structural configuration of the storage reservoir. Figure 2-12b (Regional well log cross section etc.) depicts two cartoon structural cross sections which are not accurate. The cross sections are not displayed relative to sea level and do not indicate true formation dips of the geologic conditions at the storage reservoir in a cross-section view. Regional well log structure maps (Figure 2-13) are depicted in subsea depths while both cross sections depicted in Figure 2-12b are in MD or TVD depth, not subsea depth. Accurate structural cross sections could assist in identification of existing faults within the CO₂ Storage Facility area and AoR. Applicant has failed to comply with accurate structural cross sections as required by the State of North Dakota.

Applicant has failed to comply with NDAC (43-05-01)(C-4) Geologic Exhibits j. The location, orientation, and properties of known or suspected faults and fractures that may transect the confining zone in the area of review, and a determination that they would not interfere with containment.

1. As previously discussed, Figure 2-7(b) depict several interpreted faults within the injection zone and appear to transect the confining zone. Addition 2-D and 3-D seismic data must be displayed to confirm the extent and orientation of faults within the CO₂ Storage Facility area and AoR.
2. Applicant has failed to address a Linear Geologic Surface Feature approximately 1.2 miles from the proposed injection well location which can be found on the North Dakota government website (nd.gov/gis/apps/HubExplorerV2/). This Linear Geologic Surface Feature is probable related to a large subsurface fault within the storage facility area and AoR. The near surface fresh-water aquifers could be faulted. The fault(s) could also extend several thousand feet below the surface.
3. Applicant failed to run MDT logs over the confinement formation and injection formation or any other formation at the proposed injection well location (J-ROC1) or within the Storage Facility area. Applicant does not have any Microfracture in situ stress tests from the J-ROC1 wellbore and cannot determine formation pressures, high quality fluid samples and permeability anisotropy within the Storage Facility area as required by the State of North Dakota. Applicant projects incomplete MDT data from a wellbore located over 4.5 miles (outside the proposed storage facility area) from the proposed CO₂ injection wellbore (J-ROC1) wherein geologic conditions (depth, stratigraphy, structure, dip rates, pressures, etc.) have changed above the cap rock formations, within the cap rock formations, within the injection formation and below the injection formation.
4. Applicant failed to run an FMI or QuantaGeo log in the proposed injection wellbore (J-ROC1) which can demonstrate faults and fractures within the cap rock formations, injection formation and below the injection formation and within the Storage Facility area. Applicant has no log data within the storage facility area to determine if fractures or faults exist. Applicant cannot definitively state no fractures or faults are present in the storage facility area without this data!

Applicant has failed to comply with NDAC (43-05-01)(C-4) Geologic Exhibits k. Data on the depth, areal extent, thickness, mineralogy, porosity, permeability, and capillary pressure of the injection and confining zone,

including facies changes based on field data, which may include geologic cores, outcrop data, seismic surveys, well logs, zone names, and lithologic descriptions.

1. Applicant failed to display critical characterization data from two 3-D seismic survey and four 2-D seismic lines within the Storage Facility area. Applicant did not display any geologic/geophysical maps of the confinement formations, injection formations or any other formations constructed from the 2-D and 3-D seismic data in support of the CO₂ storage facility permit application. Applicant did not display any 2-D or 3-D seismic data outside of the proposed cap rock (Icebox) formation and injection formations (Black Island / Deadwood) in support of the CO₂ storage facility permit application. Applicant did not address several faults which are depicted in Figure 2-7(b) within the cap rock (Icebox) formation and injection zone (Black Island / Deadwood) formations. No geologic/geophysical maps, interpreted seismic data or migrated seismic data (from surface to Precambrian) were displayed to support the CO₂ storage facility permit application.
2. Applicant has failed to address a Linear Geologic Surface Feature approximately 1.2 miles from the proposed injection well location which can be found on the North Dakota government website (nd.gov/gis/apps/HubExplorerV2/). This Linear Geologic Surface Feature is probable related to a surface/near surface faults extending into the subsurface within the Storage Facility area. The Linear Geologic Surface Feature is directly NE of the proposed CO₂ injection well location. The orientation of the feature is NE to SW directly toward the proposed CO₂ injection well (J-ROC1).
3. Applicant failed to run MDT logs over the confinement formation and injection formation or any other formation at the proposed injection well location (J-ROC1) or within the Storage Facility area. Applicant does not have any Microfracture in situ stress tests from the J-ROC1 wellbore and cannot determine formation pressures, high quality fluid samples and permeability anisotropy within the Storage Facility area as required by the State of North Dakota. Applicant projects incomplete MDT data from a wellbore located over 4.5 miles (outside the proposed storage facility area) from the proposed CO₂ injection wellbore (J-ROC1) wherein geologic conditions (depth, stratigraphy, structure, dip rates, pressures etc.) have changed above the cap rock formations, within the cap rock formations, within the injection formation and below the injection formation.

Applicant has failed to comply with NDAC (43-05-01)(C-4) Geologic Exhibits L: Geomechanical information on fractures, stress, ductility, rock strength, and in situ fluid pressure within the confining zone. The confining zone must be free of transmissive faults or fractures and of sufficient areal extent and integrity to contain the injected carbon dioxide.

1. Applicant failed to run MDT logs over the confinement formation and injection formation or any other formation at the proposed injection well location (J-ROC1) or within the Storage Facility area. Applicant does not have any Microfracture in situ stress tests from the J-ROC1 wellbore and cannot determine formation pressures, high quality fluid samples and permeability anisotropy within the Storage Facility area as required by the State of North Dakota. Applicant projects incomplete MDT data from a wellbore located over 4.5 miles (outside the proposed storage facility area) from the proposed CO₂ injection wellbore (J-ROC1) wherein geologic conditions (depth, stratigraphy, structure, dip rates, pressures, fault(s), etc.) have changed above the cap rock formations, within the cap rock formations, within the injection formation and below the injection formation. Applicant's Geochemical simulations cannot be accurate as all input data are based upon assumptions from outside the Storage Facility area, no actual data exists within the Storage Facility area.
2. Applicant failed to run an FMI or QuantaGeo log in the proposed injection wellbore (J-ROC1) which can demonstrate faults and fractures within the cap rock formations, injection formation and below the injection formation and within the Storage Facility area. Applicant has no log data within the storage facility area to determine if fractures or faults exist. Applicant cannot definitively state no fractures or faults are present in

the storage facility area without this data! 3-D seismic data displayed with the permit application clearly depict several faults within the injection formations.

I do not object to CO2 Sequestration, on the contrary I fully support DOE/NETL efforts to sequester CO2! My goal is to assist in evaluations of CO2 Storage Facility projects from a public perspective and help reduce risk of potential CO2 containment failures. Many times, I have found companies cut corners just to complete a project and long-term safety of people and the environment are a lesser concern. Applicant could easily remedy most of the deficiencies with additional time and completed work products as suggested and required by the State of North Dakota. Applicant could not receive a Class VI (UIC) injection well permit from the EPA with incomplete data (No MDT, FMI or QuantaGeo log) as demonstrated in this CO2 Storage Facility Permit Application. Hopefully, the North Dakota Industrial Commission will hold applicant to the same standards.

Considering the evidenced depicted within this letter I urge (on behalf of several surface owners within the CO2 Storage Facility area) the North Dakota Industrial Commission to reject Minnkota Power Cooperative, Inc's Storage Facility Permit (Case #29032) until such time the applicant fulfills all requirements set forth by the State of North Dakota in NDCC 38-22 (Carbon Dioxide Underground Storage) and NDAC 43-05-01 (Geologic Storage of Carbon Dioxide). Applicant has burdened the State of North Dakota with additional containment failure risks with an incomplete application. It would be extremely unfortunate if CO2 injection begins and immediately escapes the Black Island / Deadwood formation (injection formations).

Thank you for your prompt attention to this matter.

Sincerely,

A handwritten signature in black ink that reads "Daniel R. Zebrowski". The signature is written in a cursive style with a large, stylized 'D' and 'Z'.

Daniel R. Zebrowski
CCUS Consulting Geoscientist
4606 FM 1960 West
Suite 400
Houston, Texas 77069

Kadrmass, Bethany R.

From: Meidinger, Lorna B.
Sent: Friday, October 22, 2021 10:40 AM
To: Kadrmass, Bethany R.
Subject: RE: North Dakota Industrial Commission Notice of Hearing
Attachments: 21-0571 Survey.pdf

Bethany,

Attached is the review for this one.

Lorna Meidinger
Historic Preservation Specialist
State Historical Society of North Dakota
612 E Boulevard Ave
Bismarck, ND 58505
701.328.2089

From: Kadrmass, Bethany R. <brkadrmas@nd.gov>
Sent: Wednesday, September 29, 2021 4:14 PM
To: Meidinger, Lorna B. <lbmeidinger@nd.gov>
Subject: RE: North Dakota Industrial Commission Notice of Hearing

Lorna,

Staff suggested reviewing the map on page 25 of Case No. 29029 at:
<https://www.dmr.nd.gov/oilgas/GeoStorageofCO2.asp>

Let me know if this doesn't answer your questions, and I will connect you with Steve Fried with our office.

Bethany Kadrmass

Legal Assistant, Oil and Gas Division

701.328.8020 • brkadrmas@nd.gov • www.dmr.nd.gov



600 E Boulevard Ave, Dept. 405 • Bismarck, ND 58505

From: Meidinger, Lorna B. <lbmeidinger@nd.gov>
Sent: Wednesday, September 29, 2021 3:17 PM
To: Kadrmass, Bethany R. <brkadrmas@nd.gov>
Subject: RE: North Dakota Industrial Commission Notice of Hearing

Ms. Kadrmass,



October 22, 2021

Ms. Bethany Kadrmas
Oil and Gas Division
ND Dept of Mineral Resources
600 E Boulevard Ave, Dept. 405
Bismarck, ND 58505

ND SHPO Ref.: 21-0571 Minnkota Power Cooperative, Inc Cases 29029, 29030, 29031, 29032, 29033, 29034 in portions of 30 Sections in Oliver County, North Dakota

Dear Ms. Kadrmas,

We reviewed ND SHPO Ref.: 21-0571 Minnkota Power Cooperative, Inc Cases 29029, 29030, 29031, 29032, 29033, 29034 in portions of 30 Sections in Oliver County, North Dakota. We recommend a Class III (pedestrian survey) of archaeological resources in the project area for the proposed monitoring well. On the map within the application, this well appears to be in T142N R83W Section 34 but as that section is not listed in the legal description, it may also be in T142N R83W Section 35.

Thank you for the opportunity to review this project to date. We look forward to review of the Class III survey for archaeological resources.

Thank you for the opportunity to review this project. If you have any questions please contact Lorna Meidinger, Historic Preservation Specialist at (701) 328-2089 or lbmeidinger@nd.gov

Sincerely,

for William D. Peterson PhD
State Historic Preservation Officer
(North Dakota)

21-0571

DRAFT STORAGE FACILITY PERMIT

STORAGE FACILITY FOR CARBON SEQUESTRATION UNDER THE NORTH DAKOTA UNDERGROUND INJECTION CONTROL PROGRAM

In compliance with North Dakota Century Code Chapter (NDCC) 38-22 (Carbon Dioxide Underground Storage) and North Dakota Administrative Code (NDAC) Chapter 43-05-01 (Geologic Storage of Carbon Dioxide), Minnkota Power Cooperative, Inc. (Minnkota) has applied for a carbon dioxide storage facility permit. A draft permit does not grant the authorization to inject. This is a document prepared under NDAC 43-05-01-07.2 indicating the Commission's tentative decision to issue a storage facility permit. Before preparing the draft permit, the Commission has consulted with the Department of Environmental Quality and determined the storage facility permit application to be complete. The draft permit contains permit conditions required under NDAC 43-05-01-07.3 and 43-05-01-07.4. A fact sheet is included and contains the following information:

1. A brief description of the type of facility or activity which is the subject of the draft permit.
2. The quantity and quality of the carbon dioxide which is proposed to be injected and stored.
3. A brief summary of the basis for the draft permit conditions, including references to applicable statutory or regulatory provisions.
4. The reasons why any requested variances or alternatives to required standards do or do not appear justified.
5. A description of the procedures for reaching a final decision of the draft permit, including:
 - a. The beginning and ending dates of the comment period.
 - b. The address where comments will be received.
 - c. The date, time, and location of the storage facility permit hearing.
 - d. Any other procedures by which the public may participate in the final decision.
6. The name and telephone number of a person to contact for additional information.

This draft permit has been established on September 23, 2021 and shall remain in effect until a storage facility permit is granted under NDAC 43-05-01-05, unless amended or terminated by the Department of Mineral Resources (commission).

Stephen Fried, CCUS Supervisor
Department of Mineral Resources
Date: September 23, 2021

I. APPLICANT

Minnkota Power Cooperative, Inc.
5301 32nd Avenue South
Grand Forks, ND 58201

II. PERMIT CONDITIONS (NDAC 43-05-01-07.3)

1. The storage operator shall comply with all conditions of the permit. Any noncompliance with the permit constitutes a violation and is grounds for enforcement action, including permit termination, revocation, or modification pursuant to NDAC 43-05-01-12.
2. In an administrative action, it shall not be a defense that it would have been necessary for the storage operator to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit.
3. The storage operator shall take all reasonable steps to minimize or correct any adverse impact on the environment resulting from noncompliance with the storage facility permit.
4. The storage operator shall develop and implement an emergency and remedial response plan pursuant to section 43-05-01-13.
5. The storage operator shall at all times properly operate and maintain all storage facilities which are installed or used by the storage operator to achieve compliance with the conditions of the storage facility permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of backup or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of the storage facility permit.
6. The permit may be modified, revoked and reissued, or terminated pursuant to section 43-05-01-12. The filing of a request by the storage operator for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
7. The injection well permit or the permit to operate an injection well does not convey any property rights of any sort or any exclusive privilege.
8. The storage operator shall furnish to the commission, within a time specified by the commission, any information which the commission may request to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. The storage operator shall also

furnish to the commission, upon request, copies of records required to be kept by the storage facility permit.

9. The storage operator shall allow the commission, or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to:
 - a. Enter upon the storage facility premises where records must be kept under the conditions of the permit;
 - b. At reasonable times, have access to and copy any records that must be kept under the conditions of the permit;
 - c. At reasonable times, inspect any facilities, equipment, including monitoring and control equipment, practices, or operations regulated or required under the permit; and
 - d. At reasonable times, sample or monitor for the purposes of assuring permit compliance, any substances, or parameters at any location.
10. The storage operator shall prepare, maintain, and comply with a testing and monitoring plan pursuant to section 43-05-01-11.4.
11. The storage operator shall comply with the reporting requirements provided in section 43-05-01-18.
12. The storage operator must obtain an injection well permit under section 43-05-01-10 and injection wells must meet the construction and completion requirements in section 43-05-01-11.
13. The storage operator shall prepare, maintain, and comply with a plugging plan pursuant to section 43-05-01-11.5.
14. The storage operator shall establish mechanical integrity prior to commencing injection and maintain mechanical integrity pursuant to section 43-05-01-11.1.
15. The storage operator shall implement the worker safety plan pursuant to section 43-05-01-13.
16. The storage operator shall comply with leak detection and reporting requirements pursuant to section 43-05-01-14.
17. The storage operator shall conduct a corrosion monitoring and prevention program pursuant to section 43-05-01-15.
18. The storage operator shall prepare, maintain, and comply with the area of review and corrective action plan pursuant to section 43-05-01-05.1.

19. The storage operator shall maintain financial responsibility pursuant to section 43-05-01-09.1
20. The storage operator shall maintain and comply with post-injection site care and facility closure plan pursuant to section 43-05-01-19.

III. CASE SPECIFIC PERMIT CONDITIONS

1. NDAC 43-05-01-11.4, subsection 1, subdivision b; The operator shall notify the commission within 24 hours of failure or malfunction of surface or bottom hole gauge in the proposed McCall-1 injector, and the proposed NRDT-1 monitor well.
2. NDAC 43-05-01-11.4, subsection 1, subdivision c and NDAC 43-05-01-11, subsection 14; The operator shall run an ultrasonic or other log capable of evaluating internal and external pipe condition to establish a baseline for corrosion monitoring for the proposed McCall-1, and NRDT-1 wells. The operator shall run logs with the same capabilities for the McCall-1 on a 5 year schedule, unless analysis of corrosion coupons or subsequent logging necessitates a more frequent schedule.
3. NDAC 43-05-01-11.4; subsection 1, subdivision d and NDAC 43-05-01-13, subsection 2, The operator shall cease injection immediately, take all steps reasonably necessary to identify and characterize any release, implement the emergency and remedial response plan approved by the commission, and notify the commission within 24 hours of carbon dioxide detected above the confining zone.
4. NDAC 43-05-01-11.4, subsection 1, subdivision e and NDAC 43-05-01-11.1 subsections 3 and 5; External mechanical integrity shall be continuously monitored with the proposed fiber optic lines for the McCall-1 and NRDT-1. Due to the fiber optic line terminating above the Interlake Formation in the McCall-1 injector, an annual demonstration of external mechanical integrity is required. The commission must be notified within 24 hours should a fiber optic line fail. The commission must be notified prior to severing the line if such an action becomes necessary for remedial work or monitoring activities.
5. NDAC 43-05-01-11.4, subsection 1, subdivision h, paragraph 1; Surface air and soil gas monitoring is required to be implemented as planned by the operator in Section 4.1.4 (Surface Leak Detection and Monitoring Plan) of its permit.
6. NDAC 43-05-01-10, subsection 9, subdivision c, NDAC 43-05-01-11, subsection 15, and NDAC 43-05-01-11.1, subsection 2; The operator shall notify the commission at least 48 hours in advance to witness a mechanical integrity test of the tubing-casing annulus for the injection and monitoring wells. The packer must

be set within 100' of the upper most perforation and in the 13CR-80 casing. Dependent on evaluation, the operator shall run the same test on a 5 year schedule McCall-1 well.

7. NDAC 43-05-01-11, subsections 3 and 5; The operator shall continuously monitor the surface casing-production casing annulus with proposed fiber optic lines, and a gauge not to exceed 300 psi. The commission must be notified in advance if there is pressure that needs to be bled off.

Fact Sheet

1. Description of Facility

Minnkota's two-unit Milton R. Young Station is a mine-mouth lignite coal-fired power plant. Unit 1 and 2 have been in operation since November 1970 and May 1977, respectively. The lignite used as fuel for electrical generation is the source of carbon dioxide.

2. Quantity and Quality of Carbon Dioxide Stream

The Milton R. Young Station will capture 90% of its carbon dioxide emissions, amounting to an annual average of 4 million metric tons. The carbon dioxide is expected to be captured, dehydrated, compressed, and then injected. The projected composition of the carbon dioxide stream to be injected is at least 99% carbon dioxide with trace quantities of water (632 ppmv), nitrogen (163 ppmv), argon (4 ppmv), oxygen (6ppmv), sulfur dioxide (<1 ppmv), nitrogen dioxide (<1 ppmv), and nitric oxide (30 ppmv).

3. Summary of Basis of Draft Permit Conditions

The case specific permit conditions are unique to this storage facility, and not indicative of conditions for other storage facility permits. The conditions take into consideration the equipment proposed for this storage facility. Regulatory provisions for these conditions are all cited from NDAC Chapter 43-05-01 (Geologic Storage of Carbon Dioxide).

4. Reasons for Variances or Alternatives

No variances or alternatives.

5. Procedures Required for Final Decision

The beginning and ending dates of the comment period:
September 27, 2021 to 5:00 P.M. CDT November 1, 2021

The address where comments will be received:

Oil and Gas Division, 1016 East Calgary Avenue, Bismarck, North Dakota 58503-5512
or brkadrmas@nd.gov

Date, time, and location of the storage facility permit hearing:

November 2, 2021 9:00 A.M. CDT at 1000 East Calgary Avenue, Bismarck, North
Dakota 58503

Any other procedures by which the public may participate in the final decision:

At the hearing, the Commission will receive testimony and exhibits of interested parties.

6. Contact for Additional Information

Draft Permit Information: Stephen Fried – sjfried@nd.gov – 701-328-8020

Hearing Information: Bethany Kadrmas – brkadrmas@nd.gov – 701-328-8020



A Touchstone Energy® Cooperative 

5301 32nd Ave S
Grand Forks, ND 58201-3312
Phone 701.795.4000
www.minnkota.com

September 13, 2021

DELIVERED VIA-EMAIL: *sjfried@nd.gov*

North Dakota Industrial Commission
c/o Stephen J. Fried
State Capitol, Dept 405
600 East Boulevard Avenue
Bismarck, ND 58505-0840

–NOTIFICATION OF ELECTRONIC FILING–

RE: Minnkota Power Cooperative SFP and Class VI Corrected applications for Tundra SGS

Dear Mr. Fried,

Minnkota Power Cooperative, respectfully submits *corrected* storage facility permit applications for the establishment of a geologic storage facility and the operation of injecting and securely storing carbon dioxide located in Oliver County, North Dakota. The site link, is provided below, to access please copy and paste into a web browser:

Electronic Submission of Corrected Broom Creek Storage Facility Permit and Deadwood Storage Facility Permit, Link: [h \[REDACTED\]](#)

[REDACTED]
[\[REDACTED\]](#)

Please find enclosed herewith for filing an original of the following:

1. Permit Application Certification-Broom Creek
2. Permit Application Certification-Deadwood

Please contact me at (701) 795-4000 or smikula@minnkota.com if you have any questions regarding this filing.

Sincerely,
/s/S.Mikula
Shannon R. Mikula
Special Projects Counsel

Enclosure
cc: *Mac McLennan, mmclennan@minnkota.com*
Lawrence Bender, lbender@fredlaw.com



A Touchstone Energy® Cooperative 

5301 32nd Ave S
Grand Forks, ND 58201-3312
Phone 701.795.4000
www.minnkota.com

May 28, 2021

DELIVERED VIA-EMAIL: *sjfried@nd.gov*

North Dakota Industrial Commission
c/o Stephen J. Fried
State Capitol, Dept 405
600 East Boulevard Avenue
Bismarck, ND 58505-0840

–NOTIFICATION OF ELECTRONIC FILING–

RE: Minnkota Power Cooperative SFP and Class VI applications for Tundra SGS

Dear Mr. Fried,

Minnkota Power Cooperative, respectfully submits two storage facility permit applications for the establishment of a geologic storage facility and the operation of injecting and securely storing carbon dioxide located in Oliver County, North Dakota. The site links, are provided below:

Electronic Submission Broom Creek Storage Facility Permit, Link: [REDACTED]

[REDACTED]

[REDACTED]

Electronic Submission Deadwood Storage Facility Permit, Link: [REDACTED]

[REDACTED]

[REDACTED]

Please find enclosed herewith for filing an original of the following:

1. Permit Application Certification-Broom Creek
2. Permit Application Certification-Deadwood

Please contact me at (701) 795-4000 or smikula@minnkota.com if you have any questions regarding this filing.

Sincerely,

Shannon R. Mikula
Special Projects Counsel

Enclosure

cc: *Mac McLennan, mmclennan@minnkota.com*
Dan Laudal, dlaudal@minnkota.com
Lawrence Bender, lbender@fredlaw.com

**Permit Application Certification
-Deadwood/Black Island-**

BEFORE ME, the undersigned authority, personally appeared Robert McLennan of Minnkota Power Cooperative, Inc. whose office is located at 5301 32nd Avenue South, Grand Forks, ND 58201 who being duly sworn, upon oath stated and certify that:

1. I, Robert McLennan, am over eighteen years of age. I have personal knowledge of the information and facts stated by me in this Certification and that they are true and correct. I have never been convicted of any felony or of any crime involving moral turpitude and am fully competent to make these representations.
2. I hold the position of Chief Executive Officer for Minnkota Power Cooperative, Inc. ("Minnkota"). As required accordance with North Dakota Administrative Code § 43-05-01-07.1 and by virtue of my position with Minnkota, I am authorized to make the representations on behalf of Minnkota.
3. Enclosed are the storage facility permit applications requesting permits under Chapter 38-22 of the North Dakota Century Code, and in accordance with Article 43-05 of the North Dakota Administrative Code, for the establishment of carbon dioxide storage facilities located in Oliver County, North Dakota. One application is associated with the Broom Creek formation and another is associated with Deadwood/Black Island. Further, enclosed are the accompanying Class VI drilling permit information carbon dioxide three (3) injection wells and (1) monitoring well.
4. Based upon information and reports provided by individuals immediately responsible for compiling and preparing the enclosed permit applications and supporting information, I have personal knowledge and am familiar with the information being submitted in the enclosed documents and attachments to the permit applications. Based upon information and belief, the information contained herein is true, accurate and complete.
5. I affirm under penalty of perjury that the representations contained in this affidavit are true, to the best of my knowledge, information, and belief. I understand that there are significant penalties for submitting false information, including the possibility of a fine and imprisonment.
6. By my signature below, I hereby submit the enclosed applications and supporting documents and information on behalf of Minnkota.

Executed this 28th day of May, 2021.



Robert McLennan

STATE OF NORTH DAKOTA)

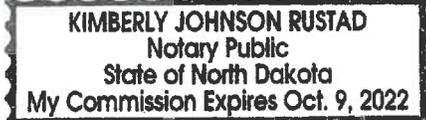
)SS.

COUNTY OF GRAND FORKS)

Subscribed and sworn to before me this 28th day of May, 2021.



Notary Public



TUNDRA SGS – CARBON DIOXIDE GEOLOGIC STORAGE FACILITY PERMIT

North Dakota CO₂ Storage Facility Permit Application – Corrected

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September 2021

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NOMENCLATURE

AES	atomic emission spectrometry
AMS	accelerator mass spectrometry
ANSI	American National Standards Institute
AOR	area of review
API	American Petroleum Institute
ASME	American Society of Mechanical Engineers
ASTM	ASTM (American Society for Testing and Materials) International
AVO	amplitude variation with offset
AZMI	above-zone monitoring interval
bb1	barrel
BHA	bottomhole assembly
BHP	bottomhole pressure
BHT	borehole temperature
BNI	BNI Coal, Inc.
BOP	blowout preventer
BOPE	blowout preventer equipment
bpm	barrels per minute
BTC	buttress-thread and coupled
CBL	cement bond log
CCP	corrosion control program
CCS	carbon capture and storage
CF	continuous flow
CFR	Code of Federal Regulations
cm	centimeter
CMG	Computer Modelling Group Ltd.
CMP	corrosion management program
CMR	combinable magnetic resonance
CO ₂	carbon dioxide
C-ODTR	coherent optical time domain reflectometry
COW	control of well
CRDS	cavity ring down spectrometry
CSE	confined space entry
CVAA	cold-vapor atomic absorption
DAS	distributed acoustic sensing
dB	decibel
DIC	dissolved inorganic carbon
DMR	Department of Mineral Resources
DO	dissolved oxygen
DOC	dissolved organic carbon
DOT	U.S. Department of Transportation

Continued . . .

NOMENCLATURE (continued)

DSS	distributed strain sensing
DTS	distributed temperature sensing
EERC	Energy & Environmental Research Center
EM	electromagnetic
EOR	enhanced oil recovery
EOS	equation of state
EPA	U.S. Environmental Protection Agency
ERR	emergency or remedial response
ERRP	emergency and remedial response plan
°F	degree Fahrenheit
FADP	financial assurance demonstration plan
FID	flame ionization detector
FMI	formation microimaging
FOSV	full opening safety valve
FPD	flame photometric detector
FS	field superintendent
ft	foot
GC	gas chromatography
g/cm ³	gram per cubic centimeter
GEM	Generalized Equation-of-State Model
GFCI	ground fault circuit interrupter
GPa	gigapascal
GPS	global positioning system
GR	gamma ray
h	hour
HCR	high closing ratio
HID	helium ionization detector
HNBR	hydrogenated nitrile butadiene rubber
HPMI	high-pressure mercury injection
HSE	health and safety and the environment
Hz	hertz
IARF	infinite-acting radial flow
HSE	health and safety and the environment
Hz	hertz
IARF	infinite-acting radial flow
HSE	health and safety and the environment
Hz	hertz
IARF	infinite-acting radial flow
IBOPSV	inside BOP safety valve
ICEA	Insulated Cable Engineers Association
ICP	inductively coupled plasma
ID	inside diameter

Continued . . .

NOMENCLATURE (continued)

IEPA	Illinois Environmental Protection Agency
in.	inch
InSAR	interferometric synthetic aperture radar
IRMS	isotope-ratio mass spectrometry
JSA	job safety analysis
kg/m ³	kilogram per cubic meter
kHz	kilohertz
Klb	thousand pound
km	kilometer
L	liter
lb	pound
LCS	laboratory control sample
LEL	lower explosive limit
LOC	loss of containment
m	meter
mA	milliampere
m amsl	meter above mean sea level
MASP	maximum anticipated surface pressure
mD	millidarcy
MD	measured depth
MDT	modular dynamics testing
MEM	mechanical earth model
mg	milligram
mg/L	milligram per liter
mi	mile
mi ²	square mile
MI	move in
MICP	mercury injection capillary pressure
Minnkota	Minnkota Power Cooperative, Inc.
ML	local magnitude
mm	millimeter
MMI	modified Mercalli intensity
MMscf/d	million standard cubic foot per day
MMt	million tonne
MMt/yr	million tonne per year
MOC	management of change
mol%	mole percent
MPa	megapascal
MRV	monitoring, reporting, and verification
MRYS	Milton R. Young Station
m/s	meter per second
m/s ²	meter per square second

Continued . . .

NOMENCLATURE (continued)

ms	millisecond
MS	mass spectrometry
MVA	monitoring, verification, and accounting
MVTL	Minnesota Valley Testing Laboratories
NACE	National Institute of Corrosion Engineers
NAICS	North American Industry Classification System
NDAC	North Dakota Administrative Code
NDCC	North Dakota Century Code
NDDH	North Dakota Department of Health
NDIC	North Dakota Industrial Commission
NDSWC	North Dakota State Water Commission
NEC	National Electrical Code
NFPA	National Fire Protection Association
NIOSH	National Institute for Occupational Safety and Health
nm	nanometer
NMPA	Northern Municipal Power Agency
NU	nipple up
O ₂	oxygen
OD	outside diameter
OEM	original equipment manufacturer
O&G	oil and gas
OLCV	Oxy Low Carbon Ventures
ORP	oxidation reduction potential
OSHA	Occupational Safety and Health Administration
P&A	plug and abandon
PCOR	Plains CO ₂ Reduction (Partnership)
PISC	postinjection site care
PLT	production logging tool
PM	project manager
PNC	pulsed-neutron capture
PNL	pulsed-neutron log
PPE	personal protective equipment
ppf	pound per foot
ppg	pound per gallon
ppm	part per million
ppmv	part per million volume
psi	pound per square inch
P/T	pressure/temperature
QA	quality assurance
QASP	quality assurance and surveillance plan
QC	quality control
QCSP	quality control and surveillance plan
RTD	resistance temperature detector

Continued . . .

NOMENCLATURE (continued)

RTU	remote terminal unit
RU	rig up
RWP	rated working pressure
§	section
s	second
SCADA	supervisory control and data acquisition
SDS	safety data sheet
SFP	storage facility permit
SGS	secure geologic storage
SIMOPS	simultaneous operations
SLRA	screening-level risk assessment
SMEs	subject matter experts
SP	spontaneous potential
Spf	shots per foot
ST	surveillance technician
SWC	sidewall coring
T&A	temporarily plugged and abandoned
TCD	thermal conductivity detector
TD	total depth
TDS	total dissolved solids
TF	task force
TIC	total inorganic carbon
TIH	trip in hole
TOC	total organic carbon
Tundra SGS	Tundra Secure Geologic Storage Site
TVD	true vertical depth
UCS	uniaxial compressive strength
UIC	underground injection control
μL	microliter
USDW	underground source of drinking water
USGS	U.S. Geological Survey
USIT	ultrasonic imaging tool
VDL	variable density log
VFD	variable-frequency drive
VOA	volatile organic analysis
VSP	vertical seismic profile
WHP	wellhead pressure
WSP	worker safety plan
wt%	weight percent
XRD	x-ray diffraction
XRF	x-ray fluorescence

TUNDRA SGS – CARBON DIOXIDE GEOLOGIC STORAGE FACILITY PERMIT APPLICATION

PERMIT APPLICATION SUMMARY

General Applicant and Project Information. Minnkota Power Cooperative, Inc. (Minnkota) and its partners prepared this supporting documentation for its storage facility and underground injection control (UIC) Class VI permit applications to establish two storage reservoirs and phased construction and operation of up to three injection wells located in Oliver County, North Dakota. The project for secure geologic storage (SGS) of carbon dioxide (CO₂) will be operated over a 20-year injection period and be named Tundra SGS. Minnkota is the project sponsor of Tundra SGS. Minnkota anticipates contributing a portion of the total equity of the proposed storage project, but the other equity participants have not yet been identified. As such, the application names Minnkota as the sole storage facility operator and applicant. However, at a time prior to construction of the Tundra SGS site infrastructure, Minnkota anticipates contributing these permits to the Tundra SGS project entity. Minnkota intends such a contribution to effect a transfer of owner and operatorship to the Tundra SGS project entity. Further, a transfer of ownership is treated as a minor modification upon filing of an application to amend for change in ownership in accordance with North Dakota Administrative Code (NDAC) §§ 43-05-01-06 and 12.1. The current mailing address for the Tundra SGS facility and Minnkota, as the storage facility operator, is the following:

Minnkota Power Cooperative, Inc.
c/o Tundra SGS
5301 32nd Avenue South
Grand Forks, ND 58201

Minnkota is a regional generation and transmission cooperative headquartered in Grand Forks, North Dakota, providing wholesale power to 11 member-owner rural electric distribution cooperatives in eastern North Dakota and northwestern Minnesota. Minnkota is also affiliated with the Northern Municipal Power Agency (NMPA), which serves the electric needs of 12 municipalities in the same geographic region as the Minnkota member-owners. Minnkota serves as the operating agent of the NMPA. Figure PS-1 provides a map showing the Minnkota and NMPA service territory.

Minnkota's primary generating resource is the two-unit Milton R. Young Station (MRYS), a mine-mouth lignite coal-fired power plant. The mine which provides the lignite coal for MRYS is owned and operated by BNI Coal, Inc. (BNI) and is adjacent to the MRYS facility. The lignite used as the fuel for electrical generation also serves as the primary source of the captured CO₂ that will be securely stored by Tundra SGS. The operation of Tundra SGS together with the carbon capture project are commonly referred to as Project Tundra. The standard industrial classification code for the principal products and services provided Minnkota is best reflected as North American Industry Classification System (NAICS) 221112, Fossil Fuel Electric Power Generation.

An organizational chart showing the relationships between Minnkota and its affiliated organizations is provided in Figure PS-2.



Figure PS-1. Map of the Minnkota and NMPA service territory.

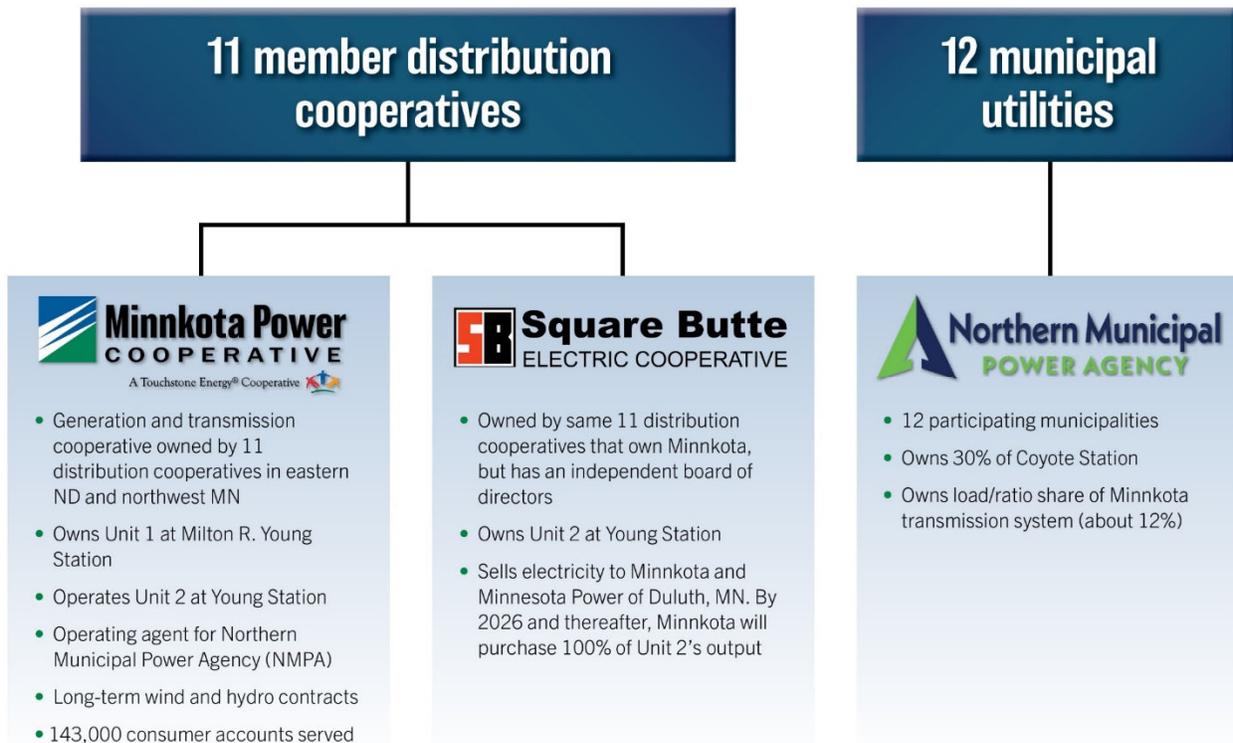


Figure PS-2. Chart showing the relationships between Minnkota and its affiliated organizations.

Minnkota proposes to initially conduct CO₂ storage operations in the Broom Creek Formation as Phase 1 of construction and operation of Tundra SGS. Two wells are proposed for Phase 1 injection of CO₂ into the Broom Creek Formation. Upon construction and operation of the two Broom Creek injection wells, validation of the Phase 1 operation and need for additional capacity will be considered in the decision to proceed with Phase 2 of development. Phase 2 of construction and operation may consist of one additional well for injection of CO₂ into the Black Island–Deadwood Formation. Alternatively, depending on the outcome of Phase 1 operation in the Broom Creek, a third injection well may be considered into the Broom Creek. Permit applications for the two proposed Phase 1 injection wells for the Broom Creek have been prepared and submitted. Since Tundra SGS is proposing a phased development approach for the site, the supporting documentation for the Phase 1 wells in the Broom Creek, as well as the Phase 2 injection well (one in the Black Island–Deadwood) is collectively provided within the application and attachments. This application and its supporting documents have been prepared in accordance with the North Dakota Century Code, and NDAC. The applications and supporting documentation are based on currently available data, including regional and site-specific data derived from two stratigraphic test wells drilled by Minnkota in 2020 and one stratigraphic test well drilled by the Energy & Environmental Research Center (EERC) in 2015, all located within 5 mi of the proposed injection wells.

The proposed Tundra SGS injection site is approximately 3.4 mi southwest of the town of Center (Figure PS-3) and will include up to three injection wells, one dedicated monitoring well for the lowest underground source of drinking water (USDW), and associated surface facility infrastructure that will accept CO₂ transported via a CO₂ flowline. In addition, one deep subsurface monitoring well is proposed to be installed approximately 2 mi northeast of the Tundra SGS injection site. All the aforementioned surface facilities and underground equipment will be contained on Minnkota-owned property, and the injection site is within the MRYS fence line (Figure PS-3).

Storage Reservoir Boundary/Area of Review. In establishing the definite boundaries of the storage facility area, Minnkota considered the characteristics and external factors influencing the operating life of the project, the opportunity for phased development of stacked storage facilities, and the coordinated operation of Broom Creek and Black Island–Deadwood storage facilities. Minnkota defines the storage reservoir boundaries as the projected vertical and horizontal migration of the CO₂ plume from the start of injection until the end of injection. The storage reservoir boundary is identified based on the computational model output of the areal extent of the subsurface CO₂ volume at the end of the injection period (20 years), in which a CO₂ saturation is predicted to be greater than or equal to 5%. To identify the storage reservoir boundaries, reservoir simulation software was used to model the coupled hydrologic, chemical, and thermal processes and chemical interactions of CO₂ with the aqueous fluids and rock minerals. The storage reservoir extent is determined from the numerical model, and the resulting map area is displayed in Figure PS-3.

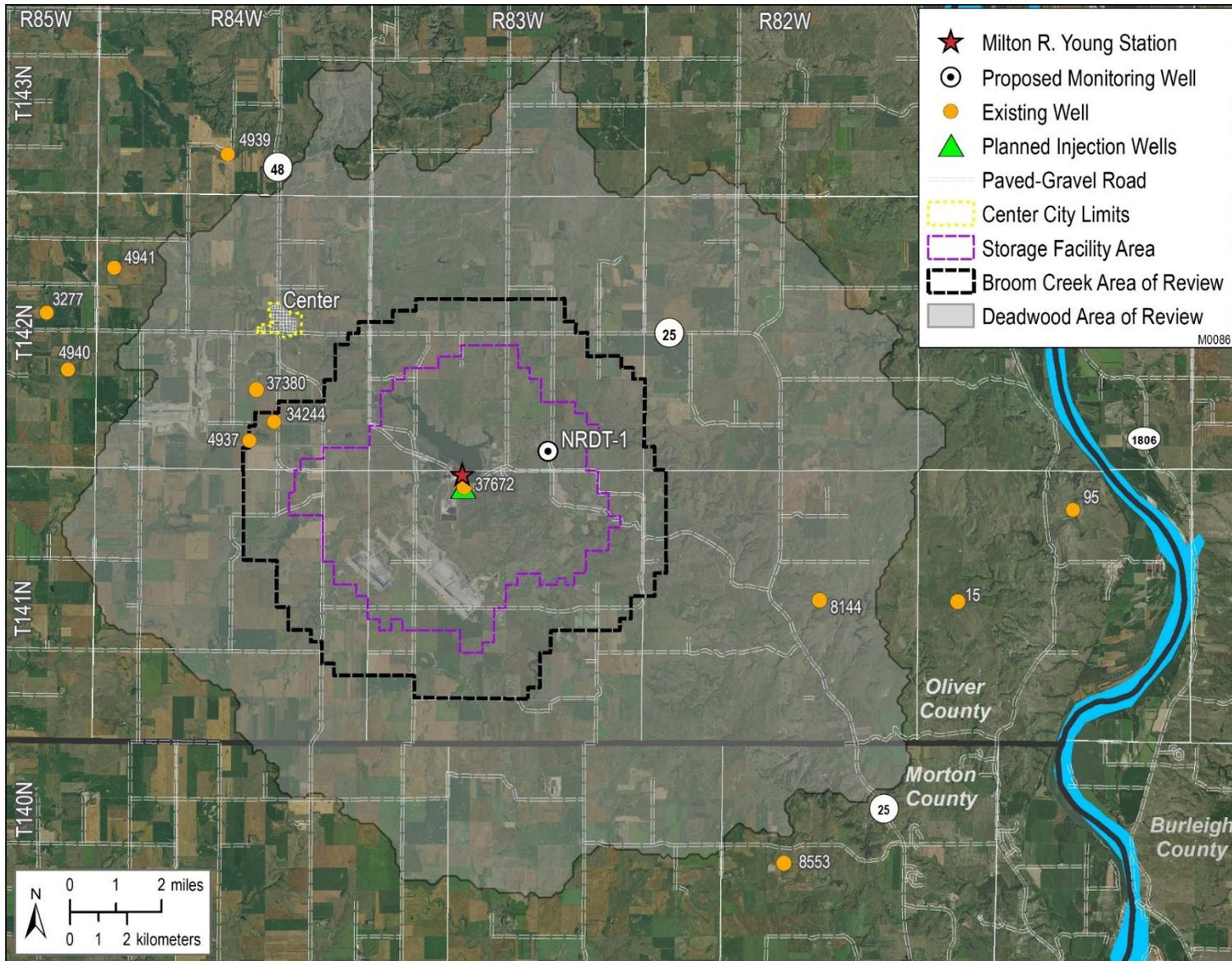


Figure PS-3. Project Tundra geologic storage of CO₂ project map.

The primary objective of the area of review (AOR) is to delineate the region encompassing the Tundra SGS site where USDWs may be endangered by the injection activity (NDAC § 43-05-01-01[4]). The AOR is generally defined as the horizontal extent of the combination of the CO₂ plume and the pressure front threshold caused by injection.

As shown in Figure PS-3, an AOR has been defined for each of the two targeted CO₂ storage horizons. These areas are used to identify the existence of any confining zone penetrations (i.e., existing wells that may penetrate the cap rock). There are five existing wellbores in the Black Island–Deadwood Formation AOR region. Three of those wellbores are the stratigraphic test holes drilled in the past 5 years as part of Tundra SGS geologic characterization efforts. Of these five existing wellbores, only three penetrated the cap rock of the Black Island–Deadwood Formation. Two of the wellbores that penetrate the Deadwood are two of the three stratigraphic test holes drilled for Tundra SGS characterization.

Of these existing wellbores, the remaining two do not penetrate the Black Island–Deadwood Formation. Within the Broom Creek Formation AOR, there are two existing wellbores, one of which is the same stratigraphic test well within the Black Island–Deadwood Formation AOR. This existing wellbore penetrates the Broom Creek Formation, and as discussed in Section 5.0, is proposed to be reentered and completed as one of the two Broom Creek Formation injectors, Liberty-1. Surface bodies of water and other pertinent surface features (including structures intended for human occupancy), administrative boundaries, and roads within the AOR are shown in Figure PS-3.

Minnkota also incorporated the AOR assessments into the proposed corrective action and monitoring plans. The deep subsurface-monitoring plan is tailored to each individual proposed AOR, while the near-surface-monitoring plan for the Broom Creek Formation extends to the boundary of the proposed Deadwood Formation AOR. The AOR assessments of these penetrating wells indicate that none could serve as conduits for the movement of fluids from the injection zone into USDWs. Therefore, no corrective actions on existing wells will need to be taken. Additionally, there are no subsurface cleanup sites, quarries, or Tribal lands within this area.

Construction and Operations Plan. The Tundra SGS project is designed to securely store the injected CO₂ within the storage reservoirs. At MRYS, the captured CO₂ stream will be at least 99% purity, dehydrated, and compressed to 1,800 psi before entering the CO₂ flowline. At these conditions, the CO₂ will be in a dense fluid phase, noncorrosive, and nonflammable. The approximately 0.25-mi (0.40-km) flowline will be 16 in. (40.64 cm) in outside diameter (OD) and have a maximum design flow rate of 4.3 MMT/yr (224 MMscf/d). Because of the short distance between the compressor and wellsite (0.25 mi), the CO₂ pressure is not anticipated to decrease significantly as the CO₂ travels the length of the flowline to the Tundra SGS site. The Broom Creek Formation injector wellhead pressure does not exceed 1,600 psi. Surface injection pressure into the Black Island–Deadwood storage zone will be increased to 2,800 psi using a booster pump downstream of the custody transfer metering station.

The Tundra SGS site design was optimized to receive CO₂ at an average operating rate of 4 MMT/yr, which represents an average annual capacity factor of 90% for the carbon capture plant. The operational design considers the need for redundancy for planned or unplanned outage of any

of the wells for maintenance or repair. Two wells are proposed for Phase 1 in the Broom Creek storage reservoir (to be named Liberty-1 and Unity-1) in a twin-well design. Liberty-1 will be a reentry into one of Minnkota's former stratigraphic test wells (J-ROC1, NDIC File No. 37672, now plugged and abandoned) and will be completed as a vertical injector. Unity-1, the twin well to Liberty-1, will be completed as a deviated injector with bottomhole location offset 1000 ft from Liberty-1. These two wells will be operated together to receive CO₂ at an annual average of 4.0 MMt/yr, with a maximum rate of 4.3 MMt/yr.

The optional Phase 2 of construction and operation contemplates a third injector as a vertical injector for the Black Island–Deadwood Formation and will be operated to receive CO₂ at a maximum rate of 1.3 MMT/yr. The phased approach to construction and the maximum rates of the three injector wells and associated equipment are based on operational flexibility, which includes consideration of the planned maintenance, outage, and operating capacity of MRYS and carbon capture equipment, along with the planned maintenance and testing requirements of the Tundra SGS site equipment.

The injection wells will be built with a protection system that will control the injection of the CO₂ and provide a means to safely stop CO₂ injection in the event of an injection well or equipment failure. The injection process will be monitored by an integrated system of equipment and instrumentation that will be capable of detecting whether injection conditions are out of permitted limits and responding by either adjusting conditions or ceasing injection. The system is designed to operate automatically with manual overrides. Additionally, Minnkota has prepared a detailed worker safety plan, which provides the minimum safety programs, permit activities, and training requirements to implement during the construction, operation, and postinjection site care activities of the Tundra SGS site.

Testing and Monitoring Plan. An extensive monitoring, verification, and accounting (MVA) system will be implemented to verify that injected CO₂ is effectively contained within the injection zone. The objectives of the MVA program are to proactively account for corrosion and leakage in the well equipment and surface facilities, track the lateral extent of CO₂ within the injection zones, characterize any geochemical or geomechanical changes that occur within the injection and confining zones that may affect containment, and track the areal extent of the injected CO₂ through indirect monitoring techniques such as geophysical and surveillance methods. The monitoring network, shown in Figure PS-3 and described in Section 4.0, will be designed to account for and verify the location of CO₂ injected.

Emergency and Remedial Response Plan (ERRP). Minnkota developed a comprehensive ERRP for the Tundra SGS site, delineating what actions would be necessary in the unlikely event of an emergency at the Tundra SGS site or within the AOR. The ERRP describes the potential affected resources and provides that site operators know which entities and individuals are to be notified and what actions need to be taken to expeditiously mitigate any emergency and protect human health and safety and the environment, including USDWs. An attachment to the ERRP identifies and categorizes potential adverse event scenarios, and if an adverse event occurred, a variety of emergency or remedial responses are outlined, to be deployed depending on the circumstances (e.g., the location, type, and volume of a release) to protect USDWs.

Postinjection Site Care and Site Closure Plan (PISC). Postinjection monitoring will include a combination of groundwater monitoring, storage zone pressure monitoring, and geophysical monitoring of the Tundra SGS site. The monitoring locations, methods, and schedule are designed to show the position of the CO₂ plume and demonstrate that the CO₂ injected is within the storage reservoir and there is no endangerment to the USDWs.

The proposed monitoring program includes one monitoring well, which covers each of the injection and above confining zones to verify that CO₂ has not migrated into that interval. In addition, a groundwater well will be completed at the Tundra SGS site in the Fox Hills Formation to monitor this lowermost federal USDW. Monitoring of the site will continue for a minimum of 10 years after injection has ceased.

Financial Responsibility Plan. Minnkota has developed a plan to maintain financial responsibility for the construction, operation, closure, and monitoring of the proposed injection wells and undertake any emergency or remedial actions that may be necessary. To ensure that sufficient funds will be available, Minnkota has obtained an estimate for the cost of hiring a third party to undertake any necessary actions to protect USDWs within the AOR. Funding for performing any needed corrective actions will be deposited in a Tundra SGS trust fund that will be available during all phases of the project. Minnkota will also obtain a third-party insurance policy that would be available for conducting any emergency or remedial response actions.

Summary. Minnkota prepared its storage facility and Class VI UIC permit applications and supporting documentation to demonstrate that 1) the proposed Tundra SGS site comprises injection zones of sufficient areal extent, thickness, porosity, and permeability to safely receive the planned injection volume and rates of CO₂ over 20 years and 2) the confining and secondary confining zones are free of transmissive faults and fractures and of sufficient areal extent and integrity to vertically contain the injected CO₂ at the proposed pressures and volumes without initiating or propagating fractures in the reservoir or confining zones. These findings are supported by the data and information gathered from coring, logging, sampling, and testing the subsurface characteristics in the three stratigraphic wells that provided site-specific geologic data as well as available regional data.

Minnkota has developed comprehensive construction and operations, testing and monitoring, injection well-plugging, and postinjection site care and site closure plans as well as an emergency and remedial response plan to protect USDWs. To ensure that sufficient funds are available to undertake these actions, Minnkota has also developed a financial responsibility plan.

Minnkota is confident that its permit applications and supporting documentation demonstrate compliance with the North Dakota Industrial Commission (NDIC) Underground Storage of Carbon Dioxide Rules and North Dakota Legislature's authorizing statute. Table PS-1 provides a crosswalk between the regulatory requirements in that rule and organization of Minnkota's supporting documentation.

Table PS-1. Crosswalk Between Applicable Regulatory Provisions in NDIC Rule and Tundra SGS Permit Application and Supporting Documents

NDIC Rule – Regulatory Requirements	Tundra SGS Permit Application
43-05-01-05. Storage Facility Permit Information	Sections 1.0, 2.0, 4.0, 5.0, and Appendixes A–C
43-05-01-05.1 Area of Review and Corrective Action	Sections 3.0, 4.2–4.3, and Appendixes A–B
43-05-01-13 Emergency Remedial Response	Section 4.2 and Appendix E
43-05-01-09 Well Permit Application Requirements	Sections 4.0, 5.0, and Form 25 (Northstar)
43-05-01-09.1 Financial Responsibility	Section 4.3 and Appendix G
43-05-01-11 Injection Well Construction and Completion Standards	Section 5.0
43-05-01-11.1 Mechanical Integrity	Sections 4.1 and 5.0
43-05-01-11.2 Logging, Sampling and Testing Prior to Injection Well Operation	Sections 2.1, 2.2, 5.0, and Appendix B
43-05-01-11.3 Injection Well Operating Requirements	Section 5.0
43-05-01-11.4 Testing and Monitoring Requirements	Section 4.1
43-05-01-11.5 Injection Well Plugging	Section 4.6
43-05-01-11.6 Injection Depth Waiver Requirements	<i>Not Applicable</i>
43-05-01-15 Storage Facility Corrosion Monitoring and Prevention Requirements	Section 4.1 and Appendix F
43-05-01-19 Post-Injection Site Care and Facility Closure Requirements	Section 4.7

1.0 PORE SPACE ACCESS

North Dakota law explicitly grants title of the pore space in all strata underlying the surface of lands and waters to the overlying surface estate, i.e., the surface owner owns the pore space (North Dakota Century Code [NDCC] Chapter 47-31 Subsurface Pore Space Policy). Prior to issuance of the storage facility permit (SFP), the storage operator is required by North Dakota statute for geologic storage of carbon dioxide (CO₂) to make a good faith attempt to obtain the consent of all persons who own pore space within the storage reservoir. The North Dakota Industrial Commission (NDIC) can amalgamate the nonconsenting owners' pore space into the storage reservoir if the operator can show that 1) after making a good faith attempt, it was able to obtain consent of persons who own at least 60% of the pore space in the storage reservoir and 2) NDIC finds that the nonconsenting owners will be equitably compensated for the use of the pore space. Amalgamation of pore space will be considered at an administrative hearing as part of the regulatory process required for consideration of the SFP application (NDCC §§ 38-22-06(3) and -06(4) and North Dakota Administrative Code [NDAC] §§ 43-05-01-08[1] and -08[2]). In connection herewith, Minnkota submits the form of storage agreement attached hereto as Appendix H which, upon final approval by NDIC, shall govern certain rights and obligations of the storage operator and the persons owning pore space within the amalgamated storage reservoir.

1.1 Storage Reservoir Pore Space

Minnkota Power Cooperative, Inc. (Minnkota) defines the proposed storage reservoir boundaries as the projected vertical and horizontal migration of the CO₂ plume from the start until the end of injection. The storage reservoir vertical and horizontal boundaries are identified based on the computational model output of the areal extent of the CO₂ plume volume at the end of the injection period (20 years), in which a CO₂ saturation is predicted to be greater than or equal to 5%. The model utilizes applicable geologic and reservoir engineering information and analysis as detailed in Section 2.0 and Appendix A.

The operation inputs for the simulation scenarios assumes storage at the average designed injection rates, approximately 4.0 MMt/year injected into the Broom Creek storage reservoir for the first 15 years of operation and 3.5MMt/year for year 15 through year 20 of operation. The operation input for the Black Island–Deadwood simulation scenario assumes storage at the maximum designed injection rate of approximately 1.17 MMt/year for 20 years. These maximum rates were based on Minnkota's consideration of the planned maintenance, outage, and operating capacity of the Milton R. Young Station (MRYS) and carbon capture equipment along with the planned maintenance requirements and testing requirements of the Tundra SGS (secure geologic storage) site equipment. During Phase 1 operation of the Broom Creek storage facility, Minnkota will conduct ongoing validation and assessment of need for construction and operation of the Black Island–Deadwood.

1.1.1 Horizontal Boundaries

The proposed horizontal boundaries of the storage reservoirs, including an adequate buffer area, are defined by the simulated migration of the CO₂ plume, using the actual rate of injection from the start until the end of injection. In establishing the definite boundaries of the storage facility area, Minnkota considered the characteristics and external factors influencing the operating life of the project, the opportunity for phased development of stacked storage facilities, and the coordinated operation of Broom Creek and Deadwood storage facilities if needed. The horizontal

storage reservoir boundary is proposed using a 20-year injection period and was benchmarked off the maximum design life of the carbon capture equipment. The reservoir models will be updated regularly with operating data and the operator will provide evidence of the CO₂ plume migration as part of the reevaluations required under NDAC §§ 43-05-01-05.1 and 43-05-01-11.4. These reevaluations are to occur no later than every 5 years, thus the simulation output at 5 years of operation is indicated in Figure 1-1 to exemplify the buffer existing within the proposed storage facility area, allowing safe operation as proposed and contemplated. The stacked storage operations scenario option allows for coordination of the capacity of the Black–Island Deadwood with the Broom Creek capacity and provides further assurance of the contemplated operation within the defined storage reservoir boundary.

The simulated horizontal storage reservoir boundary results proposed for the Deadwood Formation are depicted in Figure 1-1.

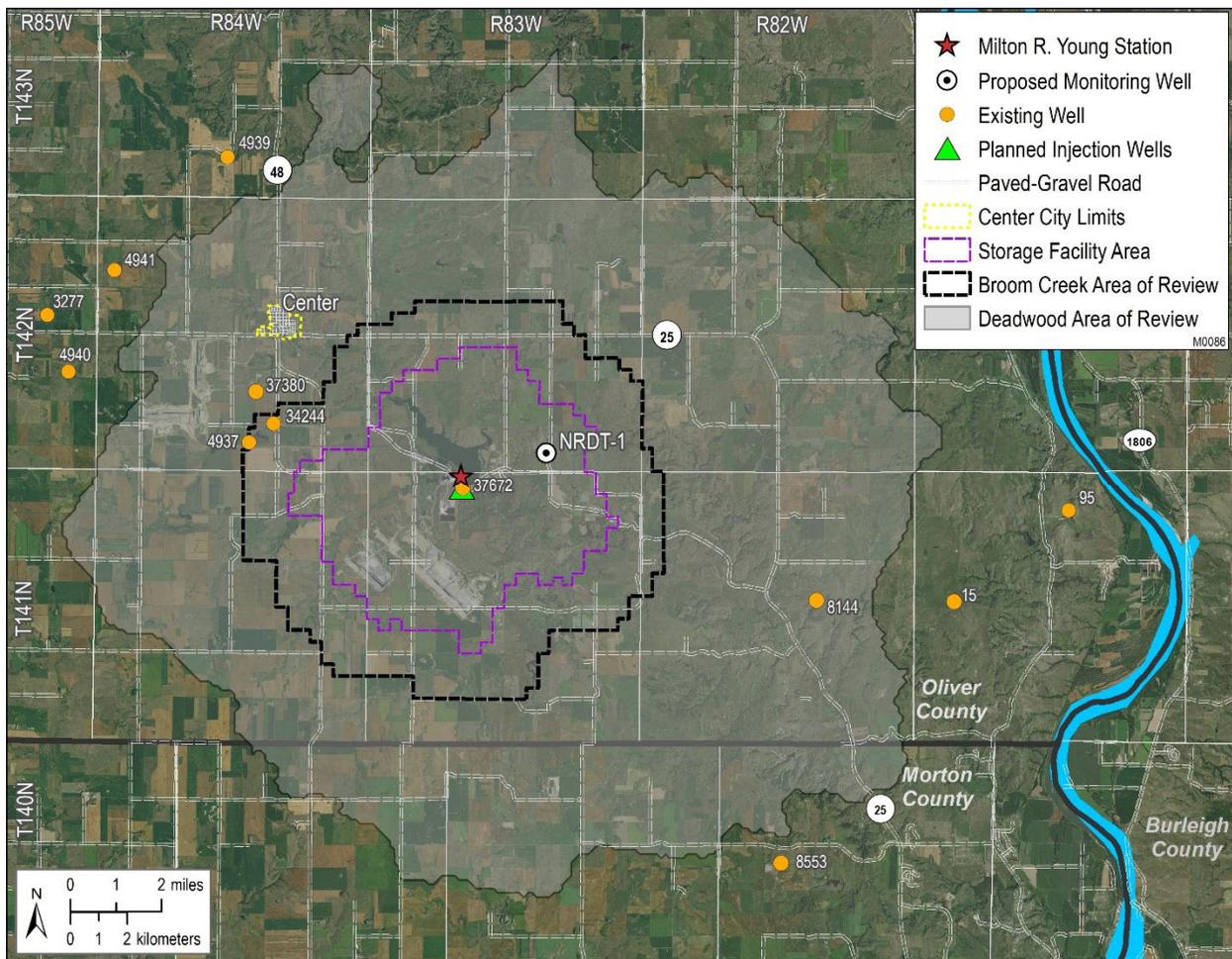


Figure 1-1. Deadwood storage facility area map.

1.1.2 Vertical Boundaries

The Tundra SGS site was designed using a stacked storage concept, where two storage reservoirs identified with varying vertical depths could be accessed by a common well site. A key benefit of this development approach is to minimize the surface land use impact by reducing the amount of surface facilities required for operation. Despite the significant overlap of pore space area between the Broom Creek and Deadwood reservoirs, two distinct SFPs are being requested, with the distinct vertical boundaries based upon geologic analysis and simulations which are further detailed and described in Section 2.0 of the respective SFP application supporting information.

The applicant requests amalgamation of the injection zone pore space within the Black Island, Deadwood E-member, and Deadwood C-member Sand intervals, as identified in Section 2.0, Figure 2-3. In addition to the injection zone, the applicant requests the permitted storage facility consist of the Icebox Formation as the upper confining zone and Deadwood B member shale as the lower confining zone (Section 2.0, Figure 2-3).

1.2 Persons Notified

Minnkota will identify the owners of record (surface and mineral), pore space and mineral lessees of record, and operators of mineral extraction activities within the facility area and within 0.5 mi of its outside boundary. Minnkota will notify in accordance with NDAC § 43-05-01-08 of the SFP hearing at least 45 days prior to the scheduled hearing. An affidavit of mailing will be provided to NDIC to certify that these notifications were made.

The identification of the owners, lessees, and operators that require notification was based on the following, recognizing that all surface owners also own the underlying pore space in accordance with North Dakota law (NDCC Chapter 47-31):

- A map showing the extent of the pore space that will be occupied by the CO₂ plume over the injection period, including the storage reservoir boundary and 0.5 mi (0.8 km) outside of the storage reservoir boundary with a description of the pore space ownership, surface owner, and pore space lessees of record (Figure 1-1).
- A table identifying all pore space (surface) owners, and lessees of pore space of record, their mailing addresses, and legal descriptions of their pore space landownership (Table 1-1).
- A table identifying each owner of record of minerals, mineral lessees and operators of record (Table 1-2).

Table 1-1. Surface Owners, Pore Space Owners and Lessees of Pore Space Requiring Hearing Notification

Surface Owners, Pore Space Owners and Lessees of Pore Space	Mailing Address	Legal Description
Minnkota Power Cooperative, Inc.	5301 32nd Avenue S., Grand Forks, ND 58201	Sec. 3-T141N-R83W Sec. 4-T141N-R83W Sec. 5-T141N-R83W Sec. 9-T141N-R83W Sec. 10-T141N-R83W Sec. 32-T142N-R83W Sec. 33-T142N-R83W Sec. 34-T142N-R83W
Square Butte Electric Cooperative	5301 32nd Avenue S., Grand Forks, ND 58201	Sec. 4-T141N-R83W Sec. 5-T141N-R83 Sec. 33-T142N-R83W
Oliver County Attn: County Auditor	Oliver County Courthouse, PO Box 188, Center, ND 58530	Sec. 5-T141N-R83W Sec. 34-T142N-R83W
BNI Coal, Ltd.	1637 Burnt Boat Drive, Bismarck, ND 58502-0897	Sec. 8-T141N-R83W Sec. 17-T141N-R83W Sec. 31-T142N-R83W Sec. 32-T142N-R83W
Five D's, LLP	3009 Bayside Drive, Mandan, ND 58554	Sec. 8-T141N-R83W
Janet K. Dohrmann and L. J. Dohrmann, Trustees of the Janet and L. J. Dohrmann Revocable Trust	9721 31st Street SW, Taylor, ND 58656	Sec. 7-T141N-R83W
Gary Leinius	204 Hager Avenue, Stanton ND 58571 AND 4958 Highway 200, Hazen ND 58545	Sec. 7-T141N-R83W Sec. 1-T141N-R84W
Delmar Hagerott	3170 27th Street, Center, ND 58530	Sec. 10-T141N-R83W Sec. 15-T141N-R83W Sec. 22-T141N-R83W
Delvin Bueligen	709A 3rd Ave. SE, Mandan, ND 58554	Sec. 10-T141N-R83W Sec. 15-T141N-R83W Sec. 22-T141N-R83W
Lowell Bueligen	13621 Homestead Lane, Riverton, UT 84065	Sec. 10-T141N-R83W Sec. 15-T141N-R83W Sec. 22-T141N-R83W
Rodella Hausauer	1611 Castillian Way, Mundelein, IL 60060	Sec. 10-T141N-R83W Sec. 15-T141N-R83W Sec. 22-T141N-R83W
James Orgaard	9589 Brentford Drive, Highlands Ranch, CO 80126	Sec. 10-T141N-R83W Sec. 15-T141N-R83W Sec. 22-T141N-R83W
Clifford Orgaard	11839 Forada Beach Road SE, Unit A, Alexandria, MN 56308	Sec. 10-T141N-R83W Sec. 15-T141N-R83W Sec. 22-T141N-R83W

Surface Owners, Pore Space Owners and Lessees of Pore Space	Mailing Address	Legal Description
Michael Orgaard	3010 27th Street, Center, ND 58530	Sec. 10-T141N-R83W Sec. 15-T141N-R83W Sec. 22-T141N-R83W
Steven Orgaard	2935 Manitoba Lane, Bismarck, ND 58501	Sec. 10-T141N-R83W Sec. 15-T141N-R83W Sec. 22-T141N-R83W
Arline Orgaard	2935 Manitoba Lane, Bismarck, ND 58501	Sec. 10-T141N-R83W Sec. 15-T141N-R83W Sec. 22-T141N-R83W
Larry F. & Virginia Schmidt, as joint tenants	2631 35th Avenue SW, Center, ND 58530	Sec. 16-T141N-R83W
Kasper J. Kraft & Donna M. Kraft	2845 35th Avenue SW, New Salem, ND 58563	Sec. 16-T141N-R83W
Kasper J. Kraft, Jr.	305 9th Street NW, Mandan, ND 58554	Sec. 16-T141N-R83W
Steve Kraft	2847 35th Avenue, New Salem, ND 58563	Sec. 16-T141N-R83W
Susan Henke	4235 20th Street SW, Stanton, ND 58571	Sec. 16-T141N-R83W
Allen Kraft	6155 12th Street SE, Bismarck, ND 58504	Sec. 16-T141N-R83W
Robin Schimke	9115 Paige Drive, Bismarck, ND 58503	Sec. 16-T141N-R83W
Oliver County	Oliver County Courthouse, 115 W Main, Center, ND 58530	Sec. 16-T141N-R83W
State of North Dakota - Dept. of Trust Lands Attn: Commissioner of University and School Lands	1707 N 9th Street, Bismarck, ND 58501	Sec. 16-T141N-R83W
Five D's LLP	4609 Borden Harbor Drive SE, Mandan, ND 58554	Sec. 17-T141N-R83W
Jerald O. Reuther	405 E Denver Avenue, Bismarck, ND 58503	Sec. 17-T141N-R83W
Wayne A. Reuther	4746 Glenwood Drive, Bismarck, ND 58504	Sec. 17-T141N-R83W Sec. 19-T141N-R83W
Karen L. Reuther	1411 Pocatello Drive, Bismarck, ND 58504	Sec. 17-T141N-R83W
Jeanette M. Reuther	P. O. Box 304, Center, ND 58530	Sec. 17-T141N-R83W
Larry F. Schmidt and Virginia Schmidt, as joint tenants	2631 35th Avenue SW, Center, ND 58530	Sec. 17-T141N-R83W
Brian Reinke	1106 East Highland Acres Road, Bismarck, ND 58501	Sec. 6-T141N-R83W
Benjamin Reinke	1215 Columbia Drive, Bismarck, ND 58504	Sec. 6-T141N-R83W
Elizabeth Wagendorf	948 Stryker Avenue, West St. Paul, MN 55118	Sec. 6-T141N-R83W
Jolene Berger	3004 Manchester Street, Bismarck, ND 58504	Sec. 6-T141N-R83W Sec. 1-T141N-R84W
Gary Leinius	204 Hager Avenue, Stanton ND 58571 AND 4958 Highway 200, Hazen ND 58545	Sec. 6-T141N-R83W
Heirs or Devisees of Alex Sorge, deceased	Center ND 58530	Sec. 32-T142N-R83W

Surface Owners, Pore Space Owners and Lessees of Pore Space	Mailing Address	Legal Description
Darlene Voegele	P.O. Box 45, Stanton, ND 58571	Sec. 31-T142N-R83W Sec. 32-T142N-R83W
Oliver County Attn: Chairman	P.O. Box 188, Center, ND 58530	Sec. 4-T141N-R83W Sec. 32-T142N-R83W
ALLETE, INC.	30 W Superior St., Duluth, MN 55802-2030	Sec. 33-T142N-R83W
Bradley Ferderer, as trustee of the Thomas A. Ferderer Residuary Trust	Heil, ND 58546	Sec. 34-T142N-R83W
State of North Dakota	1707 N 9th St., Bismarck, ND 58501-5523	Sec. 34-T142N-R83W
Robert Reinke	1144 College Drive #201, Bismarck, ND 58501	Sec. 31-T142N-R83W
Loren Schwalbe	603 3rd Ave. NE, Mandan, ND 58554	Sec. 2-T141N-R83W
Carl Schwalbe	HC 2 Box 258, Center ND 58530	Sec. 2-T141N-R83W
Rolland Schwalbe	HC 2 Box 258, Center, ND 58530	Sec. 2-T141N-R83W
Loren Schwalbe	603 3rd Ave. NE, Mandan, ND 58554	Sec. 2-T141N-R83W
Alan Schwalbe	3175 27th Street, Center, ND 58530	Sec. 10-T141N-R83W Sec. 11-T141N-R83W
Julie Hatzenbihler	P.O. Box 325, Center, ND 58530	Sec. 11-T141N-R83W
Rodney J. Hatzenbihler	2660 30th Avenue, Center, ND 58530	Sec. 11-T141N-R83W
Nancy Henke	P.O. Box 90, Hazen, ND 58545	Sec. 11-T141N-R83W
Bonnie Schwab	3203 Mink Avenue, Gillette, WY 82716	Sec. 11-T141N-R83W
Peggy Gobar	504 Garden Avenue NW, West Fargo, ND 58078	Sec. 11-T141N-R83W
Annette Hatzenbihler	310 W Tonk, Gillette, WY 82718	Sec. 11-T141N-R83W
Brent Hatzenbihler	310 W Tonk, Gillette, WY 82718	Sec. 11-T141N-R83W
Randy Hatzenbihler	P. O. Box 325, Center, ND 58530	Sec. 11-T141N-R83W
Janet K. Dohrmann and L.J. Dohrmann, as Trustees of The Janet and L.J. Fast Revocable Trust	9721 31st Street SW, Taylor, ND 58656	Sec. 18-T141N-R83W
Wayne Reuther	4746 Glenwood Drive, Bismarck, ND 58504	Sec. 18-T141N-R83W
Kent Reutherfkuf	3610 27th St. SW, New Salem, ND 58563	Sec. 18-T141N-R83W Sec. 19-T141N-R83W
Keith Reuther	3594 27th St. SW, New Salem, ND 58563	Sec. 18-T141N-R83W Sec. 19-T141N-R83W
Karen Shulz	13720 Chamy Dr., Reno, NV 89521	Sec. 18-T141N-R83W Sec. 19-T141N-R83W
Jerald Reuther	405 E. Denver Avenue, Bismarck, ND 58503	Sec. 18-T141N-R83W Sec. 19-T141N-R83W
Martha Reuther	Martha Reuther Estate, c/o Jerald Reuther, 405 E Denver Avenue, Bismarck ND 58503 AND Martha Reuther Estate, c/o Jerald Reuther, New Salem ND 58563	Sec. 18-T141N-R83W
Larry F. Schmidt and Virginia Schmidt, as joint tenants	2631 35th Ave. SW, Center, ND, 58530	Sec. 18-T141N-R83W

Surface Owners, Pore Space Owners and Lessees of Pore Space	Mailing Address	Legal Description
Winfred Keller	728 Custer Drive, Mandan, ND 58554	Sec. 19-T141N-R83W
Douglas A. Keller, Trustee of the Winfrid and Alice Keller Family Trust	913 Saint Thomas Trail, Mandan, ND 58554	Sec. 19-T141N-R83W
Charles H. Kuether	Route #1, Box 45, New Salem, ND 58563	Sec. 19-T141N-R83W
Charles H. Kuether	3555 28th Street, New Salem, ND 58563	Sec. 19-T141N-R83W
Erick G. Larson	50 Avalon Dr Unit 7323, Milford, CT 06460-8957	Sec. 19-T141N-R83W
Jack R. Hatzenbuhler and Helen Hatzenbuhler	3475 31st Street, Mandan, ND 58554	Sec. 22-T141N-R83W Sec. 27-T141N-R83W
Travis Klatt and Jessica Klatt, as joint tenants	2438 37th Ave. SW, Center, ND 58530	Sec. 1-T141N-R84W
Douglas D. Doll and Debera K. Doll	3901 Faye Avenue N, Mandan, ND 58554	Sec. 20-T141N-R83W
Becky Jo Lemar	798 San Angelo Drive, Bismarck, ND 58503	Sec. 20-T141N-R83W
Wendy April Wittenberg	3032 Ontario Lane, Bismarck, ND 58503	Sec. 20-T141N-R83W
Danielle Kae Borseth	5025 Hitchcock Drive, Bismarck, ND 58503	Sec. 20-T141N-R83W
James D. Pazdernik and Bonita Pazdernik	3487 37th Avenue, New Salem, ND 58563	Sec. 20-T141N-R83W
Thomas Pazdernik	2582 Windsor Drive N, Mandan, ND 58554	Sec. 20-T141N-R83W
Matthew Pazdernik	2445 37th Street, Mandan, ND 58554	Sec. 20-T141N-R83W
Theresa Moravec	921 Mouton Avenue, Bismarck, ND 58505	Sec. 20-T141N-R83W
Michael Pazdernik	P. O. Box 194, New Salem, ND 58563	Sec. 20-T141N-R83W
Mark Pazdernik	22 3rd Street S, Carrington, ND 58421	Sec. 20-T141N-R83W
Dale P. Pfliger and Judy Pfliger	806 Tower Place, Mandan, ND 58554	Sec. 20-T141N-R83W
Mathias Pfliger	2508 10th Avenue SE, Mandan, ND 58554	Sec. 20-T141N-R83W
Aaron Pfliger	708 17th Street NW, Mandan, ND 58554	Sec. 20-T141N-R83W
Thomas Pfliger	806 Tower Place, Mandan, ND 58554	Sec. 20-T141N-R83W
Robert J. Mosbrucker	P. O. Box 745, Bothell, WA 98041	Sec. 20-T141N-R83W
Anton Pflieger and Helen Pflieger	105 Division Street NW, Mandan, ND 58554	Sec. 20-T141N-R83W
LouAnn Nider	824 Lohstreter Road, Mandan, ND 58554	Sec. 20-T141N-R83W
Carol Pflieger Anderson	734 Aspen Place, Bismarck, ND 58503	Sec. 20-T141N-R83W
Sandra Olhauser	1829 San Diego Drive, Bismarck, ND 5850	Sec. 20-T141N-R83W
Sherry Marentette	7417 Marble Ridge, Austin, TX 78747	Sec. 20-T141N-R83W
Kari Ann Pflieger Warner	411 6th Avenue NW, Mandan, ND 58554	Sec. 20-T141N-R83W
Doll Farm Enterprises	3997 36th Street, New Salem, ND 58563	Sec. 28-T141N-R83W
Dale P. Pfliger and Judy Pfliger	806 Tower Place, Mandan, ND 58554	Sec. 28-T141N-R83W
Mathias Pfliger	2508 10th Avenue SE, Mandan, ND 58554	Sec. 28-T141N-R83W
Aaron Pfliger	708 17th Street NW, Mandan, ND 58554	Sec. 28-T141N-R83W
Thomas Pfliger	806 Tower Place, Mandan, ND 58554	Sec. 28-T141N-R83W
Clementine Freisz	710 Pine Avenue, New Salem, ND 58563	Sec. 28-T141N-R83W
Sandra K. Orgaard	2810 26th Street, Center, ND 58530	Sec. 28-T141N-R83W
Roger A. Friesz	797 7th Street, Idaho Falls, ID 83401	Sec. 28-T141N-R83W

Surface Owners, Pore Space Owners and Lessees of Pore Space	Mailing Address	Legal Description
Duane M. Friesz	4465 34th Street, New Salem, ND 58563	Sec. 28-T141N-R83W
Karen M. Porsborg	2720 37th Avenue SW, New Salem, ND 58563	Sec. 28-T141N-R83W
Michael J. Friesz	3463 County Road 87, New Salem ND, 58563	Sec. 28-T141N-R83W
Audrey A. Peterson	12719 Doris Drive, Black Hawk, SD 57718	Sec. 28-T141N-R83W
Douglas D. Doll and Deberra K. Doll	3901 Faye Avenue N, Mandan, ND 58554	Sec. 21-T141N-R83W
Becky Jo Lemar	798 San Angelo Drive, Bismarck, ND 58503	Sec. 21-T141N-R83W
Wendy April Wittenberg	3032 Ontario Lane, Bismarck, ND 58503	Sec. 21-T141N-R83W
Danielle Kae Borseth	5025 Hitchcock Drive, Bismarck, ND 58503	Sec. 21-T141N-R83W
James D. Pazdernik and Bonita Pazdernik	3487 37th Avenue, New Salem, ND 58563	Sec. 21-T141N-R83W
Thomas Pazdernik	2582 Windsor Drive N, Mandan, ND 58554	Sec. 21-T141N-R83W
Matthew Pazdernik	2445 37th Street, Mandan, ND 58554	Sec. 21-T141N-R83W
Theresa Moravec	921 Mouton Avenue, Bismarck, ND 58505	Sec. 21-T141N-R83W
Michael Pazdernik	P.O. Box 194, New Salem, ND 58563	Sec. 21-T141N-R83W
Mark Pazdernik	22 3rd Street S, Carrington, ND 58421	Sec. 21-T141N-R83W
Anton Pflieger and Helen Pflieger	105 Division Street NW, Mandan, ND 58554	Sec. 21-T141N-R83W
LouAnn Nider	824 Lohstreter Road, Mandan, ND 58554	Sec. 21-T141N-R83W
Carol Pflieger Anderson	734 Aspen Place, Bismarck, ND 58503	Sec. 21-T141N-R83W
Sandra Olhauser	1829 San Diego Drive, Bismarck, ND 58504	Sec. 21-T141N-R83W
Sherry Marentette	7417 Marble Ridge, Austin, TX 78747	Sec. 21-T141N-R83W
Kari Ann Pflieger Warner	411 6th Avenue NW, Mandan, ND 58554	Sec. 21-T141N-R83W
Delmar Hagerott	3170 27th Street, Center, ND 58530	Sec. 21-T141N-R83W
Delvin Bueligen	709A 3rd Ave. SE, Mandan, ND 58554	Sec. 21-T141N-R83W
Lowell Bueligen	13621 Homestead Lane, Riverton, UT 84065	Sec. 21-T141N-R83W
Rodella Hausauer	1611 Castillian Way, Mundelein, IL 60060	Sec. 21-T141N-R83W
James Orgaard	9589 Brentford Drive, Highlands Ranch, CO 80126	Sec. 21-T141N-R83W
Clifford Orgaard	11839 Forada Beach Road SE; Unit A, Alexandria, MN 56308	Sec. 21-T141N-R83W
Michael Orgaard	3010 27th Street, Center, ND 58530	Sec. 21-T141N-R83W
Steven Orgaard	2935 Manitoba Lane, Bismarck, ND 58501	Sec. 21-T141N-R83W
Arline Orgaard	2935 Manitoba Lane, Bismarck, ND 58501	Sec. 21-T141N-R83W
City of Center Park District	Center, ND 58530	Sec. 2-T141N-R84W
Barry A. Berger and Carrie Berger, as joint tenants	809 Main Street E, Center, ND 58530	Sec. 2-T141N-R84W
Dwight Wrangham and Linda Wrangham, as joint tenants	301 52nd St. SE, Bismarck, ND 58501	Sec. 2-T141N-R84W
BNI Coal, Ltd.	1637 Burnt Boat Drive, P.O. Box 897, Bismarck, ND 58502-0897	Sec. 2-T141N-R84W

Surface Owners, Pore Space Owners and Lessees of Pore Space	Mailing Address	Legal Description
Eugene Yantzer and Betty Yantzer, as joint tenants	2745 18th St. SW, Center, ND 58530	Sec. 2-T141N-R84W
Delmar Hagerott Robert Edward Hagerott and Margaret Ruth Hagerott, Trustees, or their successors in trust under the Robert Edward Hagerott Revocable Trust, dated February 14, 1997	86 Warren Street, Needham, MA 2492	Sec. 29-T141N-R83W
Steven P. Kraft and Julie F. Kraft, as joint tenants	2847 35th Avenue, New Salem, ND 58563	Sec. 29-T141N-R83W
Delmar Hagerott	3170 27th Street, Center, ND 58530	Sec. 13-T141N-R83W
Annette Hatzenbihler	310 W Tonk, Gillette, WY 82718	Sec. 13-T141N-R83W
Nancy Henke and Dwight Henke	P.O. Box 90, Hazen, ND 58545	Sec. 13-T141N-R83W
Brent Hatzenbihler	310 W Tonk, Gillette, WY 82718	Sec. 13-T141N-R83W
Melissa Hatlestad	2372 Harmon Lane, Mandan, ND 58554	Sec. 13-T141N-R83W
Travis Henke	965 Gregory Lane, Mountain Home, ID 83647	Sec. 13-T141N-R83W
Rodney Hatzenbihler	2660 30th Avenue, Center, ND 58530	Sec. 13-T141N-R83W
Delvin Bueligen	709A 3rd Avenue SE, Mandan, ND 58554	Sec. 13-T141N-R83W
Lowell Bueligen	13621 Homestead Lane, Riverton, UT 84065	Sec. 13-T141N-R83W
Rodella Hausauer	1611 Castillian Way, Mundelein, IL 60060	Sec. 13-T141N-R83W
James Orgaard	9589 Brentford Drive, Highlands Ranch, CO 80126	Sec. 13-T141N-R83W
Clifford Orgaard	11839 Forada Beach Road SE, Unit A, Alexandria, MN 56308	Sec. 13-T141N-R83W
Michael Orgaard	3010 27th Street, Center, ND 58530	Sec. 13-T141N-R83W
Steven Orgaard	2935 Manitoba Lane, Bismarck, ND 58501	Sec. 13-T141N-R83W
Arline Orgaardz	2935 Manitoba Lane, Bismarck, ND 58501	Sec. 13-T141N-R83W
Mark Leischner and Susan Leischner	2866 Woodland Place, Bismarck, ND 58504-8922	Sec. 13-T141N-R83W
Mark Erhardt	P.O. Box 132, Center, ND 58530	Sec. 13-T141N-R83W
Burton & Etheleen Enterprises, LLC	3655 County Road 139, New Salem, ND 58563	Sec. 14-T141N-R84W
Lee Dresser	P.O. Box 683, Riverdale, ND 58565	Sec. 14-T141N-R84W
Jesse L. Lackman and Darcy J. Lackman Revocable Living Trust	2647 37th Avenue SW, Center, ND 58530	Sec. 14-T141N-R84W
David Porsborg and Karen Porsborg	2720 37th Avenue, New Salem, ND 58563	Sec. 24-T141N-R84W
Beverly Faul	1420 9th Avenue NE, McClusky, ND 58463	Sec. 24-T141N-R84W
Brad Bonnet	3444 110th Avenue NE, Bismarck, ND 58504	Sec. 24-T141N-R84W
Justin Kessler	6045 Lyndale Avenue S, #255, Minneapolis, MN 55419	Sec. 24-T141N-R84W

Surface Owners, Pore Space Owners and Lessees of Pore Space	Mailing Address	Legal Description
Adam Porsborg	2722 37th Avenue SW, New Salem, ND 58563	Sec. 24-T141N-R84W
Andrew Porsborg	2722 37th Avenue SW, New Salem, ND 58563	Sec. 24-T141N-R84W
Chad Porsborg	3206 Stonewall Drive, Bismarck, ND 58501	Sec. 24-T141N-R84W
Heather Bullinger	2602 10th Avenue SE, Mandan, ND 58554	Sec. 24-T141N-R84W
Christie Sorge	4412 E Mulberry, #312, Ft. Collins, CO 80524	Sec. 24-T141N-R84W
Tina Sorge	4412 E Mulberry, #312, Ft. Collins, CO, 80524	Sec. 24-T141N-R84W
Jerald Reuther	405 E Denver Avenue, Bismarck, ND 58503	Sec. 24-T141N-R84W
Wayne Reuther	476 Glenwood Drive, Bismarck, ND 58504	Sec. 24-T141N-R84W
Keith Reuther	3594 27th Street SW, New Salem, ND 58563	Sec. 24-T141N-R84W
Karen Shulz	13720 Chamy Drive, Reno, NV 89521	Sec. 24-T141N-R84W
Kent Reuther and Pam Reuther	3610 27th Street SW, New Salem, ND 58563	Sec. 24-T141N-R84W
Kenneth W. Reinke and Darlene Reinke	3841 25th Street SW, Center, ND 58530	Sec. 10-T141N-R84W
Minnkota Power Cooperative, Inc.	P.O. Box 13200, Grand Forks, ND 58208-3200	Sec. 3-T141N-R84W
Minnkota Power Cooperative, Inc.	1822 Mill Road, P.O. Box 3200, Grand Forks, ND 58208-3200	Sec. 3-T141N-R84W
Agnes Dockter	2424 South 121st Street, Seattle, WA 98101	Sec. 15-T142N-R83W
Steve Schmidt and Julie Schmidt, as joint tenants	P.O. Box 1936, Center, ND 58530	Sec. 15-T142N-R83W
Mike Saba a/k/a Michael P. Saba	26560 N. Shore Pl., Hartford, SD 57033	Sec. 15-T142N-R83W
State of North Dakota, for the use and benefit of the State Highway Department	608 East Boulevard Avenue, Bismarck, ND 58505-0700	Sec. 15-T142N-R83W
Larry Doll	3155 49th Avenue, New Salem, ND 58563	Sec. 23-T142N-R83W
Ann Doll	4601 McKenzie Drive SE, Mandan, ND 58554	Sec. 23-T142N-R83W
Larry Doll	3155 49th Avenue, New Salem, ND 58563	Sec. 23-T142N-R83W
State of North Dakota Board of University and School Lands	1707 N 9th Street, Bismarck, ND 58501	Sec. 36-T142N-R84W
Oliver County Attn: County Auditor	P.O. Box 188, Center, ND 58530-0188	Sec. 36-T142N-R84W
Minnkota Power Cooperative, Inc.	1822 State Mill Road, P. O. Box 13200", Grand Forks, ND 58208-3200	Sec. 36-T142N-R84W
BNI Coal, Ltd.	2360 35th Avenue SW, Center, ND 58530-9499	Sec. 36-T142N-R84W
BNI Coal, Ltd.	P.O. Box 897, Bismarck, ND 58502	Sec. 36-T142N-R84W
Larry J. Doll and Faye Doll	3155 49th Avenue, New Salem, ND 58563	Sec. 25-T142N-R83W

Surface Owners, Pore Space Owners and Lessees of Pore Space	Mailing Address	Legal Description
Haag Brothers, a partnership consisting of Thomas Haag, Donald Haag, and Conrad Haag	3051 Highway 25, Center, ND 58530	Sec. 24-T142N-R84W
Wayne Haag and Jennifer Haag, as joint tenants	P.O. Box 184, Center, ND 58530	Sec. 24-T142N-R84W
Kenneth J. Schmidt, Trustee of the Monica Schmidt Trust U/W DTD 1/18/2002	2205 36th Avenue SW, Center, ND 58530	Sec. 25-T142N-R84W
Kenneth Schmidt	2205 36th Avenue SW, Center, ND 58530	Sec. 25-T142N-R84W
Joseph Schmidt	3581 22 Street SW, Center, ND 58530	Sec. 19-T142N-R83W
Kenneth J. Schmidt, Trustee of the Monica Schmidt Trust U/W DTD 1/18/2002	2205 36th Avenue SW, Center, ND 58530	Sec. 19-T142N-R83W
Matthias A. Erhardt, trustee, or successor trustee(s), of the Matthias A. Erhardt Trust dated December 27, 1994	2121 35th Avenue SW, Center, ND 58530	Sec. 19-T142N-R83W
Josephine Erhardt, trustee, or successor trustee(s), of the Josephine Erhardt Trust dated December 27, 1994	2121 35th Avenue SW, Center, ND 58530	Sec. 19-T142N-R83W
Joey Nagel	RR1, Box 256, Center, ND 58530	Sec. 1-T141N-R83W
Jerry Nagel	RR1, Box 256, Center, ND 58530	Sec. 1-T141N-R83W
Richard A. Schwalbe and Lila M. Schwalbe, as joint tenants	HC 2, Box 254, Center, ND 58530	Sec. 1-T141N-R83W
Carl Schwalbe	HC 2 Box 258, Center, ND 58530	Sec. 1-T141N-R83W
Rolland Schwalbe	HC 2 Box 258, Center, ND 58530	Sec. 1-T141N-R83W
Loren Schwalbe	603 3rd Ave. NE, Mandan, ND 58554	Sec. 1-T141N-R83W
Richard A. Schwalbe and Lila M. Schwalbe, as joint tenants	HC 2, Box 254, Center, ND 58530	Sec. 12-T141N-R83W
Albert Schwalbe	502 3rd Ave. NW, Mandan, ND 58554	Sec. 12-T141N-R83W
Fred Schwalbe	Center, ND 58530	Sec. 12-T141N-R83W
Raynold Schwalbe	Center, ND 58530	Sec. 12-T141N-R83W
Walter Schwalbe	Center, ND 58530	Sec. 12-T141N-R83W
Julie Hatzenbihler	P.O. Box 325, Center, ND 58530	Sec. 12-T141N-R83W
Rodney J. Hatzenbihler	2660 30th Avenue, Center, ND 58530	Sec. 12-T141N-R83W
Nancy Henke and Dwight Henke, as joint life tenants	P.O. Box 90, Hazen, ND 58545	Sec. 12-T141N-R83W
Melissa Hatlestad	2372 Harmon Lane N, Mandan, ND 58554	Sec. 12-T141N-R83W

Surface Owners, Pore Space Owners and Lessees of Pore Space	Mailing Address	Legal Description
Travis Henke	965 Gregory Lane, Mountain Home, ID 83647	Sec. 12-T141N-R83W
Bonnie Schwab	3203 Mink Avenue, Gillette, WY 82716	Sec. 12-T141N-R83W
Peggy Gobar	504 Garden Ave. NW, West Fargo, ND 58078	Sec. 12-T141N-R83W
Annette Hatzenbihler	310 W. Tonk, Gillette, WY 82718	Sec. 12-T141N-R83W
Brent Hatzenbihler	310 W. Tonk, Gillette, WY 82718	Sec. 12-T141N-R83W
Randy Hatzenbihler	P.O. Box 325, Center, ND 58530	Sec. 12-T141N-R83W
Reda Renee Clinton and Stephanie A. Clarys, as joint tenants	3135 27th St. SW, Center, ND 58530	Sec. 14-T141N-R83W
Michael P. Hilton	3135 27th St. SW, Center, ND 58530	Sec. 14-T141N-R83W
Oliver County	Oliver County Courthouse, P.O. Box 188, Center, ND 58530	Sec. 14-T141N-R83W
John Barnhardt	1511 North 21st Street, Bismarck, ND 58501	Sec. 14-T141N-R83W
Gail M. Hilton	3195 27th St., Center, ND 58530	Sec. 14-T141N-R83W
Delmar Hagerott	3170 27th Street, Center, ND 58530	Sec. 14-T141N-R83W
Arline Orgaard	2935 Manitoba Lane, Bismarck, ND 58501	Sec. 14-T141N-R83W
Delvin Bueligen	709A 3rd Ave. SE, Mandan, ND 58554	Sec. 14-T141N-R83W
Lowell Bueligen	13621 Homestead Lane Riverton, UT 84065	Sec. 14-T141N-R83W
Rodella Hausauer	1611 Castillian Way, Mundelein, IL 60060	Sec. 14-T141N-R83W
James Orgaard	9589 Brentford Drive, Highlands Ranch, CO 80126	Sec. 14-T141N-R83W
Clifford Orgaard	11839 Forada Beach Road SE, Unit A, Alexandria, MN 56308	Sec. 14-T141N-R83W
Steven Orgaard	2935 Manitoba Lane, Bismarck, ND 58501	Sec. 14-T141N-R83W
Michael Orgaard	3010 27th Street, Center, ND 58530	Sec. 14-T141N-R83W
Dale Barnhardt	3199 27th Street, Center, ND 58530	Sec. 14-T141N-R83W
Alan Schwalbe	3175 27th St., Center, ND 58530	Sec. 14-T141N-R83W
Jeff Erhardt and Mary Erhardt, as joint tenants	2161 34th Ave. SW, Center, ND 58530	Sec. 20-T142N-R83W
Yolanda Bittner	3428 Highway 25, Center, ND 58530	Sec. 20-T142N-R83W
Matthias A. Erhardt, as trustee of the Matthias A. Erhardt Trust dated December 27, 1994	2121 35th Ave. SW, Center, ND 58530	Sec. 20-T142N-R83W
Josephine Erhardt, as trustee of the Josephine Erhardt Trust dated December 27, 1994	2121 35th Ave. SW, Center, ND 58530	Sec. 20-T142N-R83W
State of North Dakota, N.D. Dept. of Trust Lands	1707 N 9th St, Bismarck, ND 58501-5523	Sec. 20-T142N-R83W
Raymond Friedig, as personal representative of the Estate of Magdalen F. Friedig, deceased	523 South Anderson Street, Bismarck, ND 58504	Sec. 26-T142N-R83W
Carl Schwalbe	Center, ND 58530	Sec. 26-T142N-R83W

Surface Owners, Pore Space Owners and Lessees of Pore Space	Mailing Address	Legal Description
Heirs or devisees of the Estate of Loren Schwalbe, deceased	3520 81st Ave. SE, Unit 15, Jamestown, ND 58401	Sec. 26-T142N-R83W
Rolland Schwalbe	Center, ND 58530	Sec. 26-T142N-R83W
Randolph Middleton and Mary Middleton, as joint tenants	2298 32nd Ave SW, Center, ND 58530	Sec. 26-T142N-R83W
Dale Barth	2255 33rd Ave. SW, Center, ND 58530	Sec. 27-T142N-R83W
Minnkota Power Cooperative, Inc.	5301 32nd Avenue S, Grand Forks, ND 58201-3312	Sec. 28-T142N-R83W
Minnkota Power Cooperative, Inc.	1822 Mill Road, P.O. Box 13200, Grand Forks, ND 58208-3200	Sec. 28-T142N-R83W
Bradley Ferderer, as trustee of the Thomas A. Ferderer Residuary Trust	Heil, ND 58546	Sec. 28-T142N-R83W
Dale Barth	2255 33rd Ave SW, Center, ND 58530	Sec. 28-T142N-R83W
Dusty Backer	PO Box 411, Underwood, ND 58576	Sec. 28-T142N-R83W
Minnkota Power Cooperative, Inc.	5301 32nd Avenue S, Grand Forks, ND 58201-3312	Sec. 29-T142N-R83W
Minnkota Power Cooperative, Inc.	1822 Mill Road, P.O. Box 13200, Grand Forks, ND 58208-3200	Sec. 29-T142N-R83W
Darlene Voegele	P.O. Box 45, Stanton, ND 58571	Sec. 29-T142N-R83W
Charles Kuether	3555 28th St., New Salem, ND 58563	Sec. 29-T142N-R83W
Doris Kuether	3555 28th St., New Salem, ND 58563	Sec. 29-T142N-R83W
Terrie Nehring	2234 35th Ave. SW, Center, ND, 58530	Sec. 29-T142N-R83W
Minnkota Power Cooperative, Inc.	5301 32nd Avenue S, Grand Forks, ND 58201-3312	Sec. 30-T142N-R83W
Minnkota Power Cooperative, Inc.	1822 Mill Road, P.O. Box 13200, Grand Forks, ND 58208-3200	Sec. 30-T142N-R83W
Ryan J. Weber	2241 29th Ave. SW, Center, ND 58530	Sec. 30-T142N-R83W
Darlene Voegele	P.O. Box 45, Stanton, ND 58571	Sec. 30-T142N-R83W
Bradley Dahl	602 Lehmkuhl St., PO Box 276, Center, ND 58530	Sec. 30-T142N-R83W
Brennan Price	3074 Highway 25, Center, ND 58530-1015	Sec. 35-T142N-R83W
State of North Dakota, N.D. Dept. of Trust Lands	1707 N 9th St, Bismarck, ND 58501-5523	Sec. 36-T142N-R83W
Michelle Marie Ternes	3721 W Regent Drive, Bismarck, ND 58504	Sec. 35-T142N-R84W
Michael P. Dresser	3731 24th Street SW, Center, ND 58530	Sec. 35-T142N-R84W
BNI Coal, Ltd.	P.O. Box 897, Bismarck, ND 58502	Sec. 35-T142N-R84W
Oliver County, Attn: County Auditor & Hwy Dept.	P.O. Box 188, Center, ND 58530-0188	Sec. 34-T142N-R84W
BNI Coal, Ltd	P.O. Box 879, Minot, ND 58702	Sec. 34-T142N-R84W
Dale Barth	2255 33rd Ave. SW, Center, ND 58530	Sec. 16-T142N-R83W
State of North Dakota	1707 N 9th Street, Bismarck, ND 58501	Sec. 16-T142N-R83W
Luella C. Isaak	3347 Hwy 25, Center, ND 58530	Sec. 16-T142N-R83W

Surface Owners, Pore Space Owners and Lessees of Pore Space	Mailing Address	Legal Description
Burton Isaak	3345 Hwy 25, Center, ND 58530	Sec. 16-T142N-R83W
Burton Lee Isaak, individually	3345 Hwy 25, Center, ND 58530	Sec. 16-T142N-R83W
Brenda Kitzan	3313 Hwy 25, Center, ND 58530	Sec. 16-T142N-R83W
Brent J. Isaak	2065 33rd Avenue SW, Center, ND 58530	Sec. 16-T142N-R83W
Luella C. Isaak	3345 Hwy 25, Center, ND 58530	Sec. 16-T142N-R83W
Brent Isaak	2065 33rd Avenue SW, Center, ND 58530	Sec. 16-T142N-R83W
Yolanda Bittner	3428 Highway 25, Center, ND 58530	Sec. 17-T142N-R83W
The State of North Dakota	1707 N 9th Street, Bismarck, ND 58501	Sec. 17-T142N-R83W
Jolene Berger	3004 Manchester Street, Bismarck, ND 58504	Sec. 12-T141N-R84W
Brian Dresser	2574 37th Avenue SW, Center, ND 58530	Sec. 12-T141N-R84W
Frances Fuchs	2475 37th Avenue NW, Center, ND 58530	Sec. 12-T141N-R84W
Rosalie A. Dingus	400 Augsburg Avenue, Bismarck, ND 58504	Sec. 12-T141N-R84W
Mark R. Fuchs	18671 Fairweather, Canyon Country, CA 91351	Sec. 12-T141N-R84W
Jack B. Fuchs	15409 Rhododendron Drive, Canyon Country, CA 91351	Sec. 12-T141N-R84W
Jeff Erhardt and Mary Erhardt, as joint tenants	2161 34th Ave. SW, Center, ND 58530	Sec. 21-T142N-R83W
Keith Erhardt	P.O. Box 1846, Center, ND 58530	Sec. 21-T142N-R83W
Keith Erhardt and Kelly Jo Erhardt, as joint tenants	P.O. Box 1846, Center, ND 58530	Sec. 21-T142N-R83W
Melvin Schoepp and Caroline Schoepp, as joint tenants	2023 Northridge Drive, Bismarck, ND 58503	Sec. 21-T142N-R83W
Larry Doll and Fay Doll, as joint tenants	3155 49th Ave., New Salem, ND 58563	Sec. 21-T142N-R83W
State of North Dakota	1707 N 9th St, Bismarck, ND, 58501-5523	Sec. 21-T142N-R83W
Lee Dresser	P. O. Box 683, Riverdale, ND 58565	Sec. 11-T141N-R84W
David O. Berger and Debra A. Berger, as joint tenants	2531 37th Avenue SW, Center, ND 58530	Sec. 11-T141N-R84W
Melvin Schoepp	3020 Daytona Drive, Bismarck, ND 58503	Sec. 22-T142N-R83W
Caroline K. Schoepp	3020 Daytona Drive, Bismarck, ND 58503	Sec. 22-T142N-R83W
Larry Doll and Fay Doll, as joint tenants	3155 49th Ave., New Salem, ND 58563	Sec. 22-T142N-R83W
Larry Doll	3155 49th Ave., New Salem, ND 58563	Sec. 22-T142N-R83W
Grealing Starck and Deborah Stark, as joint tenants	3244 Highway 25, Center, ND 58530	Sec. 22-T142N-R83W
Marie Mosbrucker	127 Klein Avenue, Center, ND 58530	Sec. 22-T142N-R83W
Raymond Friedig	523 South Anderson Street, Bismarck, ND 58504	Sec. 22-T142N-R83W
Duane Friedig	1706 East Bowman Avenue, Bismarck, ND 58504	Sec. 22-T142N-R83W
Shirley Hilzendeger	110 Klein Avenue, Center, ND 58530	Sec. 22-T142N-R83W

Surface Owners, Pore Space Owners and Lessees of Pore Space	Mailing Address	Legal Description
Ann Doll	4601 McKenzie Drive SE, Mandan, ND 58554	Sec. 22-T142N-R83W
State of North Dakota	1707 N 9th St, Bismarck, ND 58501-5523	Sec. 22-T142N-R83W

Table 1-2. Mineral Owners, Mineral Lessees and Operators Requiring Hearing Notification

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Minnkota Power Cooperative, Inc.	5301 32nd Avenue S, Grand Forks, ND 58201	Sec. 5-T141N-R83W
Square Butte Electric Cooperative	5301 32nd Avenue S, Grand Forks, ND 58201	Sec. 5-T141N-R83W
Great Northern Properties L.P.	1415 Louisiana Street, Suite 2400, Houston, TX 77002-7361	Sec. 5-T141N-R83W
Great Northern Properties L.P.	1658 Cole Boulevard, Building #6; Suite 2, Golden, CO 80401	Sec. 5-T141N-R83W
Great Northern Properties L.P.	1101 N 27th Street, Suite 201, Billings, MT, 59101	Sec. 5-T141N-R83W
Susanna Skubinna	Egeland ND 58331	Sec. 5-T141N-R83W
Mildred Meili Miran	21500 Miran Farm Lane, Aldie, VA 20105	Sec. 5-T141N-R83W
Marilyn Meili	7681 East Vista Drive, Scottsdale, AZ 85250-6824	Sec. 5-T141N-R83W
Douglas L. Franklin	4409 S 292nd Street, Auburn, WA 98002	Sec. 5-T141N-R83W
R. C. Newkirk	4208 Lone Oak Drive, Fort Worth, TX 76107	Sec. 5-T141N-R83W
Vernon R. Young	2954 Chevy Chase Drive, Houston, TX 77019Z	Sec. 5-T141N-R83W
Charles W. LaGrave and Louis G. Kravits, as joint tenants	118 Weiss Court, Hercules, CA 94547	Sec. 5-T141N-R83W
Richard Haddaway	109 Estates Drive, Santa Fe, NM 87506	Sec. 5-T141N-R83W
Percy Lee Henderson	3032 Willing Avenue, Fort Worth, TX 76110	Sec. 5-T141N-R83W
W. H. Henderson	1016 S Main Street, Fort Worth, TX 76104	Sec. 5-T141N-R83W
K. C. Kyle, Jr.	P. O. Box 253, Carthage, TX 75633	Sec. 5-T141N-R83W
Catherine Westbrook	12 North Park, Randolph AFB, TX 78148	Sec. 5-T141N-R83W
Joseph Harrison Shelton, Jr.	18629 Reamer Road, Castro Valley, CA 94546	Sec. 5-T141N-R83W
Katherine S. Fulcher	1120 N Golder, Odessa, TX 79761	Sec. 5-T141N-R83W
C. H. Kopp and Blanche Kopp, as joint tenants	1609 E Cypress, Enid, OK 73701	Sec. 5-T141N-R83W
Stanley T. Staggs and Cora Staggs, as joint tenants	2233 NW 31 St., Oklahoma City, OK 73112	Sec. 5-T141N-R83W
Wyman Orlin Meigs	2408 Zion Park, Yukon, OK 73099-5939	Sec. 5-T141N-R83W
Robert Michael Westfall	No address of record	Sec. 5-T141N-R83W
Don Walter Westfall	No address of record	Sec. 5-T141N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
First National Bank and Trust Company of Oklahoma City, Trustee under Agreement with Othel D. Westfall	c/o Boatmen's National Bank of Oklahoma, Bank of America, National Association (3510), Charlotte, NC, 100 North Tryon Street, Suite 170, Charlotte, NC 28202	Sec. 5-T141N-R83W
Charyl W. Loveridge and Margaret A. Loveridge, as joint tenants	701 Vandehei Avenue, Cheyenne, WY 82009-2553	Sec. 5-T141N-R83W
Dierdre A. (Reynolds) Shipman	6501 Deerview Trail, Durham, NC 27712	Sec. 5-T141N-R83W
John T. Reynolds	2835 Pond Apple, Schertz, TX 78154	Sec. 5-T141N-R83W
Mary L. (Reynolds) Hamlin	#9 Hickory Ridge, Texarkana, TX 75503	Sec. 5-T141N-R83W
Shauna I. (Reynolds) Lee	1127 Felicity Street, New Orleans, LA 70130	Sec. 5-T141N-R83W
Red Crown Royalties, LLC	1490 W Canal Court, Suite 3000, Littleton, CO 80120	Sec. 5-T141N-R83W
Red Crown Royalties, LLC	P. O. Box 888, Littleton, CO 80160-0888	Sec. 5-T141N-R83W
Tenneco Oil Company	P. O. Box 2511, Houston, TX 77252	Sec. 5-T141N-R83W
Tenneco Oil Company	1001 Louisiana, P. O. Box 2511, Houston, TX 77252-2511	Sec. 5-T141N-R83W
Frase-Tucker Resources, LLC	P. O. Box 994486, Redding, CA 96099	Sec. 5-T141N-R83W
Meridian Minerals Company	5613 DTC Parkway, Suite 1100, Englewood, CO 80111	Sec. 5-T141N-R83W
United States of America	Unknown address	Sec. 8-T141N-R83W
State of North Dakota - Dept. of Trust Lands	1707 N 9th Street, Bismarck, ND 58501	Sec. 8-T141N-R83W
Great River Energy Attn: Eric J. Olsen	12300 Elm Creek Boulevard N, Maple Grove, MN 55369-4718	Sec. 8-T141N-R83W
Minnkota Power Cooperative, Inc.	5301 32nd Avenue S, Grand Forks, ND 58201	Sec. 8-T141N-R83W
David Erhardt	13906 Round Oak Court. Houston, TX 77059	Sec. 8-T141N-R83W
Delphine Vetter	2317 79th Street SE, Linton, ND 58552	Sec. 8-T141N-R83W
Doretta Bornemann	511 County 27, Hazen, ND 58545	Sec. 8-T141N-R83W
Danita Deichert	3009 Bayside Drive, Mandan, ND 58554	Sec. 8-T141N-R83W
Dean P. Erhardt	120 Tennessee Walker Way, St. Peters, MO 63376	Sec. 8-T141N-R83W
Larry F. Schmidt and Virginia Schmidt, as joint tenants	2631 35th Avenue SW, Center, ND 58530	Sec. 8-T141N-R83W
Donna Barnhardt	8050 17th Avenue NE, Bismarck, ND 58501	Sec. 8-T141N-R83W
Linda Kilber	2928 Avenue B East, Bismarck, ND 58501	Sec. 8-T141N-R83W
Loretta Tabor	7100 Country Hills Drive, Bismarck, ND 58503	Sec. 8-T141N-R83W
John L. Kautzman	1314 22nd Street W, Williston, ND 58801-2139	Sec. 8-T141N-R83W
W. T. Brown	No street address of record, Newton, KS 67114	Sec. 8-T141N-R83W
Alexander Hamilton	2nd and Francis Streets, St. Joseph MO 64501	Sec. 8-T141N-R83W
Nick N. Kouloures	No address of record	Sec. 8-T141N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Clay E. Kedrick	306 Morningside Lane, Newton, KS, 67114	Sec. 8-T141N-R83W
Clay E. Kedrick	P. O. Box 205, Newton, KS, 67114	Sec. 8-T141N-R83W
Florence L. Hedrick	324 E 3rd Street, Newton, KS 67114	Sec. 8-T141N-R83W
O. Sutorius	No address of record	Sec. 8-T141N-R83W
Albert A. Goering	P. O. Box 366, Newton, KS, 67114	Sec. 8-T141N-R83W
Dean E. Stucky and O. Jean Stucky, as joint tenants	901 North Walnut, Medicine Lodge, KS 67104	Sec. 8-T141N-R83W
PEC Minerals LP	14860 Montfort Drive Suite 209, Dallas, TX, 75254	Sec. 8-T141N-R83W
Black Stone Minerals Company, L. P.	1001 Fannin, Suite 2020, Houston, TX, 77002-6709	Sec. 8-T141N-R83W
Walter Duncan, Inc.	100 Park Avenue, Suite 1200, Oklahoma City, OK 73102-8006	Sec. 8-T141N-R83W
J. C. Fore	303 S Okfuskee Avenue, Wewoka, OK 74884	Sec. 8-T141N-R83W
J. L. McMullen	127 N 4th St., Okemah, OK 74859-2456 AND 215 S 5th St., Okemah, OK 74859-3808	Sec. 8-T141N-R83W
Lily Stamper	No street address of record, Okemah, OK 74859	Sec. 8-T141N-R83W
George R. McKown	No street address of record, Okemah, OK 74859	Sec. 8-T141N-R83W
Mabel M. Johnson	P. O. Box 114, Wewoka, OK 74884	Sec. 8-T141N-R83W
Gerthel B. Fore	303 S Okfuskee Avenue, Wewoka, OK 74884	Sec. 8-T141N-R83W
O. C. Fore	303 S Okfuskee Avenue, Wewoka, ND 74884	Sec. 8-T141N-R83W
Carl Files	No street address of record, Okemah, OK 74859	Sec. 8-T141N-R83W
Ralph P. Kautzman	Center, ND 58530 AND 1408 Central Avenue, Mandan ND 58554	Sec. 8-T141N-R83W
Irene Kautzman	Center, ND 58530	Sec. 8-T141N-R83W
Breene Associates	P. O. Box 1773, Bismarck, ND 58501	Sec. 8-T141N-R83W
Breene Associates	1005 Ash Coulee Place, Bismarck, ND 58503	Sec. 8-T141N-R83W
Dallas Engineering, Inc.	P. O. Box 80707, Fairbanks, AK 99708	Sec. 8-T141N-R83W
Penelope Files	3387 W Silver Springs Boulevard, Lot 13, Ocala, FL 34475	Sec. 8-T141N-R83W
Carolyn K. Files	P. O. Box 154, Bunn, NC 27508	Sec. 8-T141N-R83W
Kurt Von Files	143 Lake Royale, Louisburg, NC 27549	Sec. 8-T141N-R83W
Erika Lee Files	HC5, Box 103-1, Gainesville, MO 65655	Sec. 8-T141N-R83W
Robert Carl Files	1720 1/2 Reed Avenue, San Diego, CA, 92109	Sec. 8-T141N-R83W
Richard Irwin Files	1720 1/2 Reed Avenue, San Diego, CA, 92109	Sec. 8-T141N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Janet K. Dohrmann and L. J. Dohrmann, Trustees of the Janet and L. J. Dohrmann Revocable Trust	9721 31st Street SW, Taylor, ND 58656	Sec. 7-T141N-R83W
Janet K. Dohrmann and Jamie A. Fast, Co-Trustees of the Opp Family Mineral Trust	9721 31st Street SW, Taylor, ND 58656	Sec. 7-T141N-R83W
Great Northern Properties LP	601 Jefferson Street; Suite 3600, Houston, TX 77002	Sec. 7-T141N-R83W
BNI Coal, Ltd.	1637 Burnt Boat Drive, Bismarck, ND 58502-0897	Sec. 7-T141N-R83W
State of North Dakota - Dept. of Trust Lands	1707 N 9th Street, Bismarck, ND 58501	Sec. 7-T141N-R83W
Meridian Minerals Company	5613 DTC Parkway, Suite 1100, Englewood, CO, 80111	Sec. 7-T141N-R83W
Meridian Minerals Company	2919 Allen Parkway, Houston, TX, 77019-2142	Sec. 7-T141N-R83W
Gary Leinius	204 Hager Avenue, Stanton ND 58571 AND 4958 Highway 200, Hazen ND 58545	Sec. 7-T141N-R83W
James Schneider	RR #1 Box 56, Center, ND 58530	Sec. 7-T141N-R83W
Gail Schneider	RR #1 Box 56, Center, ND 58530	Sec. 7-T141N-R83W
Ida Schwalbe Estate c/o Rolland Schwalbe	3160 25th Street, Center, ND 58530	Sec. 7-T141N-R83W
Wilma Lueneburg Estate c/o Linda Lueneburg	3730 Lockport St., Bismarck, ND 58503	Sec. 7-T141N-R83W
Alvin Hagerott	3190 27th Ave., Center, ND 58530	Sec. 7-T141N-R83W
Delmar Hagerott	3170 27th Street, Center, ND 58530	Sec. 15-T141N-R83W
Delvin Bueligen/Delvin Bueligen and Jill Bueligen, as joint tenant	709A 3rd Ave. SE, Mandan, ND 58554	Sec. 15-T141N-R83W
Lowell Bueligen/Lowell Bueligen and Tammy Bueligen, as joint tenants	13621 Homestead Lane, Riverton, UT 84065	Sec. 15-T141N-R83W
Rodella Hausauer/Rodella Hausauer and Barry Hausauer, as joint tenants	1611 Castillian Way, Mundelein, IL 60060	Sec. 15-T141N-R83W
James Orgaard	9589 Brentford Drive, Highlands Ranch, CO, 80126	Sec. 15-T141N-R83W
Clifford Orgaard	11839 Forada Beach Road SE; Unit A, Alexandria, MN 56308	Sec. 15-T141N-R83W
Michael Orgaard	3010 27th Street, Center, ND 58530	Sec. 15-T141N-R83W
Steven Orgaard	2935 Manitoba Lane, Bismarck, ND 58501	Sec. 15-T141N-R83W
Arline Orgaard	2935 Manitoba Lane, Bismarck, ND 58501	Sec. 15-T141N-R83W
Norlan Hagerott	744 Lake Avenue, Ortonville, MN 56278	Sec. 15-T141N-R83W
Albert Hagerott	3190 27th St, Center, ND 58530-9559	Sec. 15-T141N-R83W
Mary Hagerott	1719 N Bell St, Bismarck, ND 58501-1531	Sec. 15-T141N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Robert Edward Hagerott and Margaret Ruth Hagerott, Trustees, or their successors in trust, of the Robert Edward Hagerott Revocable Trust, dated February 14, 1997	86 Warren Street, Needham, MA 02492	Sec. 15-T141N-R83W
Edward C. Hagerott and Rosemary T. Hagerott, Trustees, or their successors in trust, under the Edward C. Hagerott and Rosemary T. Hagerott Living Trust dated April 29, 1999	136 West Bonita Avenue, Sierra Madre, CA 91024	Sec. 15-T141N-R83W
James Richard Keddy and Margaret R. Keddy, and successors, as Trustees of the Keddy Family Trust, dated January 14, 1994	16331 Serenade Lane, Huntington Beach, CA 82647	Sec. 15-T141N-R83W
Thomas Price	1211 Imperial Dr, Bismarck, ND 58504-7570 AND 115 Lakeview Dr, Watford City, ND 58854-7810 AND PO Box 96, Wolverton, MN 56594-0096 AND PO Box 631, Spencer, IN 47460-0631	Sec. 15-T141N-R83W
Dorothy L. Keck, Trustee of the Albert E. and Dorothy L. Keck Family Trust, dated July 21, 1989	1256 Cain Lane, Escondido, CA 92027	Sec. 15-T141N-R83W
Grace Ellen Janssen	Center, ND 58530	Sec. 15-T141N-R83W
State of North Dakota - Dept. of Trust Lands - Board of University & School Lands Attn: Commissioner of University and School Lands	1707 N 9th Street, Bismarck, ND 58501	Sec. 16-T141N-R83W
State of North Dakota - Board of University & School Lands Attn: Commissioner of University and School Lands	1707 N 9th Street, Bismarck, ND 58501	Sec. 17-T141N-R83W
BNI Coal, Ltd.	2360 35th Avenue SW, Center, ND 58530-9499	Sec. 17-T141N-R83W
Central Dakota Humane Society	2104 37th St., Mandan, ND 58554	Sec. 17-T141N-R83W
David Erhardt	13906 Round Oak Court, Houston, TX 77059	Sec. 17-T141N-R83W
Delphine Vetter	2317 79th Street SE, Linton, ND 58552	Sec. 17-T141N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Doretta Bornemann	511 County 27, Hazen, ND 58545	Sec. 17-T141N-R83W
Danita Deichert	3009 Bayside Drive, Mandan, ND 58554	Sec. 17-T141N-R83W
Dean P. Erhardt	120 Tennessee Walker Way, St. Peters, MO 63376	Sec. 17-T141N-R83W
Larry F. Schmidt and Virginia Schmidt, as joint tenants	2631 35th Avenue SW, Center, ND 58530	Sec. 17-T141N-R83W
Jerald O. Reuther	405 E Denver Avenue, Bismarck, ND 58503	Sec. 17-T141N-R83W
Wayne A. Reuther	4746 Glenwood Drive, Bismarck, ND 58504	Sec. 17-T141N-R83W
Karen L. Reuther	1411 Pocatello Drive, Bismarck, ND 58504	Sec. 17-T141N-R83W
Jeanette M. Reuther	P. O. Box 304, Center, ND 58530	Sec. 17-T141N-R83W
Donna Barnhardt	8050 17th Avenue NE, Bismarck, ND 58501	Sec. 17-T141N-R83W
Linda Kilber	2928 Avenue B East, Bismarck, ND 58501	Sec. 17-T141N-R83W
Loretta Tabor	7100 Country Hills Drive, Bismarck, ND 58503	Sec. 17-T141N-R83W
John L. Kautzman	1314 22nd Street W, Williston, ND 58801-2139	Sec. 17-T141N-R83W
W. T. Brown	No street address of record, Newton, KS 67114	Sec. 17-T141N-R83W
Alexander Hamilton	2nd and Francis Streets, St. Joseph MO 64501	Sec. 17-T141N-R83W
Nick N. Kouloures	No address of record	Sec. 17-T141N-R83W
Florence L. Hedrick	324 E 3rd Street, Newton, KS 67114	Sec. 17-T141N-R83W
O. Sutorius	No address of record	Sec. 17-T141N-R83W
Albert A. Goering	P. O. Box 366, Newton, KS 67114	Sec. 17-T141N-R83W
Dean E. Stucky and O. Jean Stucky, as joint tenants	901 North Walnut, Medicine Lodge, KS 67104	Sec. 17-T141N-R83W
PEC Minerals LP	14860 Montfort Drive, Suite 209, Dallas, TX 75254	Sec. 17-T141N-R83W
Black Stone Minerals Company, L. P.	1001 Fannin, Suite 2020, Houston, TX 77002-6709	Sec. 17-T141N-R83W
Walter Duncan, Inc.	100 Park Avenue, Suite 1200, Oklahoma City, OK 73102-6709	Sec. 17-T141N-R83W
J. C. Fore	303 S Okfuskee Avenue, Wewoka, OK 74884	Sec. 17-T141N-R83W
J. L. McMullen	127 N 4TH ST, Okemah OK 74859-2456 AND 215 S 5TH ST Okemah OK 74859-3808	Sec. 17-T141N-R83W
Lily Stamper	No street address of record, Okemah OK 74859	Sec. 17-T141N-R83W
George R. McKown	No street address of record, Okemah OK 74859	Sec. 17-T141N-R83W
Mabel M. Johnson	P. O. Box 114, Wewoka, OK 74884	Sec. 17-T141N-R83W
Gerthel B. Fore	303 S Okfuskee Avenue, Wewoka, OK 74884	Sec. 17-T141N-R83W
O. C. Fore	303 S Okfuskee Avenue, Wewoka, OK 74884	Sec. 17-T141N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Carl Files	No street address of record, Okemah, OK 74859	Sec. 17-T141N-R83W
Ralph P. Kautzman	Center, ND 58530 AND 1408 Central Avenue, Mandan ND 58554	Sec. 17-T141N-R83W
Irene Kautzman	Center, ND 58530	Sec. 17-T141N-R83W
Breene Associates	P. O. Box 1773, Bismarck, ND 58501	Sec. 17-T141N-R83W
Breene Associates	1005 Ash Coulee Place, Bismarck, ND 58503	Sec. 17-T141N-R83W
Dallas Engineering, Inc.	P. O. Box 80707, Fairbanks, AK 99708	Sec. 17-T141N-R83W
Penelope Files	3387 W Silver Springs Boulevard, Lot 13, Ocala, FL 34475	Sec. 17-T141N-R83W
Carolyn K. Files	P. O. Box 154, Bunn, NC 27508	Sec. 17-T141N-R83W
Kurt Von Files	143 Lake Royale, Louisburg, NC 27549	Sec. 17-T141N-R83W
Erika Lee Files	HC5, Box 103-1, Gainesville, MO 65655	Sec. 17-T141N-R83W
Robert Carl Files	1720 1/2 Reed Avenue, San Diego, CA 92109	Sec. 17-T141N-R83W
Richard Irwin Files	1720 1/2 Reed Avenue, San Diego, CA 92109	Sec. 17-T141N-R83W
James Schneider	RR #1, Box 56, Center, ND 58530	Sec. 6-T141N-R83W
Gail Schneider	RR #1, Box 56, Center, ND 58530	Sec. 6-T141N-R83W
Ida Schwalbe Estate c/o Rolland Schwalbe	3160 25th Street, Center, ND 58530	Sec. 6-T141N-R83W
Wilma Lueneburg Estate c/o Linda Lueneburg	3730 Lockport St., Bismarck, ND 58503	Sec. 6-T141N-R83W
Alvin Hagerott	3190 27th Ave., Center, ND 58530	Sec. 6-T141N-R83W
Gary Leinius	204 Hager Avenue, Stanton ND 58571 AND 4958 Highway 200, Hazen ND 58545	Sec. 6-T141N-R83W
State of North Dakota - Dept. of Trust Lands	1707 N 9th Street, Bismarck, ND 58501	Sec. 6-T141N-R83W
Brian Reinke	1106 East Highland Acres Road, Bismarck, ND 58501	Sec. 6-T141N-R83W
Benjamin Reinke	1215 Columbia Drive, Bismarck, ND 58504	Sec. 6-T141N-R83W
Elizabeth Wagendorf	948 Stryker Avenue, West St. Paul, MN 55118	Sec. 6-T141N-R83W
United States of America	Unknown address	Sec. 6-T141N-R83W
Red Crown Royalties, LLC	1490 W Canal Court, Suite 3000, Littleton, CO 80120	Sec. 6-T141N-R83W
Tenneco Oil Company	P. O. Box 2511, Houston, TX 77252	Sec. 6-T141N-R83W
Frase-Tucker Resources, LLC	P. O. Box 994486, Redding, CA 96099	Sec. 6-T141N-R83W
Minnkota Power Cooperative, Inc.	5301 32nd Avenue S, Grand Forks, ND 58201-3312	Sec. 6-T141N-R83W
Duane C. Anderson	1321 Whispering Hill, Ada, OK 74820	Sec. 9-T141N-R83W
Corrine L. Dockter	507 S 8th Street, Lot #10, Bismarck, ND 58504	Sec. 9-T141N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Vi Ann Olson	2130 27th Avenue S, Grand Forks, ND 58201	Sec. 9-T141N-R83W
Gary A. Anderson	110 Lakota Avenue, Center, ND 58530	Sec. 9-T141N-R83W
Willard C. Anderson	No address of record (Check with Duane, Corrine, Vi or Gary)	Sec. 9-T141N-R83W
Wallace R. Anderson	No address of record (Check with Duane, Corrine, Vi or Gary), Star Prairie, WI 54026	Sec. 9-T141N-R83W
Minnkota Power Cooperative, Inc.	5301 32nd Avenue S, Grand Forks, ND 58201-3312	Sec. 32-T142N-R83W
Heirs or Devisees of Alex Sorge, deceased	Center ND 58530	Sec. 32-T142N-R83W
Darlene Voegelé	P. O. Box 45, Stanton, ND 58571	Sec. 32-T142N-R83W
BNI Coal, Ltd. (f/k/a Baukol-Noonan, Inc.)	1637 Burnt Boat Drive, Bismarck, ND 58502	Sec. 32-T142N-R83W
Wayne Windhorst	P. O. Box 45, Stanton, ND 58571	Sec. 32-T142N-R83W
Spindletop Exploraton Company, Inc.	P. O. Box 50787, Midland, TX 79710-0787	Sec. 32-T142N-R83W
Estate of Elizabeth Meader, deceased	116 Dix Ave., Kingsbury, NY 12809	Sec. 32-T142N-R83W
Estate of Mildred Doyle, deceased	6 Tower Street, Red Hook, NY 12571	Sec. 32-T142N-R83W
Shirley A. Kilgour	6 Tower Street, Red Hook, NY 12571	Sec. 32-T142N-R83W
Denis A. Doyle	9 Spencer Drive, Red Hook, NY 12571	Sec. 32-T142N-R83W
United States of America	Unknown address	Sec. 32-T142N-R83W
Square Butte Electric Cooperative	5301 32nd Avenue S, Grand Forks, ND 58201-3312	Sec.4-T141N-R83W
Minnkota Power Cooperative, Inc.	5301 32nd Avenue S, Grand Forks, ND 58201-3312	Sec.4-T141N-R83W
Anna Manny	Center, ND 58530	Sec.4-T141N-R83W
United States of America	Unknown address	Sec.4-T141N-R83W
Square Butte Electric Cooperative	5301 32nd Avenue S, Grand Forks, ND 58201-3312	Sec. 33-T142N-R83W
Minnkota Power Cooperative, Inc.	5301 32nd Avenue S, Grand Forks, ND 58201-3312	Sec. 33-T142N-R83W
ALLETE, INC.	30 W Superior St., Duluth, MN 55802-2030	Sec. 33-T142N-R83W
Anna Manny	Center, ND 58530	Sec. 33-T142N-R83W
Pat Nassif	429 Sunset Place, Bismarck, ND 58504	Sec. 33-T142N-R83W
Fran Glasser	4735 Pintail Loop SE, Mandan, ND 58554	Sec. 33-T142N-R83W
Real S. A. K.	2207 East Main, Suite #2, Bismarck, ND 58501	Sec. 33-T142N-R83W
AgriBank, FCB (f/k/a The Federal Land Bank and Farm Credit Bank of Saint Paul)	375 Jackson Street, P.O. Box 64949, St. Paul, MN 55164-0949	Sec. 33-T142N-R83W
Floyd B. Sperry	No street address of record, Bismarck, ND 58501	Sec. 33-T142N-R83W
State of North Dakota N.D. Dept. of Trust Lands	1707 N 9th St, Bismarck, ND 58501-5523	Sec. 33-T142N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Great Northern Properties Limited Partnership Attn: Steven K. Shirley	1101 N. 27th Street, Suite 201, Billings, MT 59101	Sec. 33-T142N-R83W
Meridian Minerals Company	5613 DTC Parkway, Suite 1100, Englewood, CO 80111	Sec. 33-T142N-R83W
Minnkota Power Cooperative, Inc.	5301 32nd Avenue S, Grand Forks, ND 58201-3312	Sec. 34-T142N-R83W
Bradley Ferderer, as trustee of the Thomas A. Ferderer Residuary Trust	Heil, ND 58546	Sec. 34-T142N-R83W
Nick Ferderer	Flasher, ND 58535 AND 912 Summit Blvd, Bismarck ND 58504-5277	Sec. 34-T142N-R83W
Harry H. Ferderer	907 Cowl Street, Milton Freewater OR 97862-1682	Sec. 34-T142N-R83W
John R. Ferderer	115 C Street North, Richardton ND 58652	Sec. 34-T142N-R83W
Eleanor Falstad	Eleanor Falstad Estate, c/o Valerie Fast, 2495 15th St. NW, Coleharbor ND 58531-9449	Sec. 34-T142N-R83W
Joyce Ervin, as personal representative of the Estate of Marie M. McGirl, deceased	2073 Rayshire Street, Thousand Oaks CA 91362-2460	Sec. 34-T142N-R83W
Esther Ferderer, as personal representative of the Estate of Jake H. Ferderer, deceased	No address of record	Sec. 34-T142N-R83W
Dorene Rambur	500 North 17th Street, Bismarck ND 58501	Sec. 34-T142N-R83W
Norman D. Bunch	6900 Wedgewood Ct., Black Hawk, SD 57718-9680	Sec. 34-T142N-R83W
Kaspar Barth	Center ND 58530	Sec. 34-T142N-R83W
United States of America	Unknown address	Sec. 34-T142N-R83W
County of Oliver	Oliver County Courthouse, 115 W Main, Center, ND 58530	Sec. 34-T142N-R83W
Pat Nassif	429 Sunset Place, Bismarck, ND 58504	Sec. 34-T142N-R83W
Fran Glasser	4735 Pintail Loop SE, Mandan, ND 58554	Sec. 34-T142N-R83W
Real S. A. K.	2207 East Main, Suite #2, Bismarck, ND 58501	Sec. 34-T142N-R83W
Floyd B. Sperry	No street address of record, Bismarck, ND 58501	Sec. 34-T142N-R83W
AgriBank, FCB (f/k/a The Federal Land Bank and Farm Credit Bank of Saint Paul)	375 Jackson Street, P.O. Box 64949, St. Paul, MN 55164-0949	Sec. 34-T142N-R83W
Minnkota Power Cooperative, Inc.	5301 32nd Avenue S, Grand Forks, ND 58201-3312	Sec. 3-T141N-R83W
Alan Schwalbe	3175 27th St., Center, ND 58530	Sec. 3-T141N-R83W
Pat Nassif	429 Sunset Place, Bismarck, ND 58504	Sec. 3-T141N-R83W
Fran Glasser	4735 Pintail Loop SE, Mandan, ND 58554	Sec. 3-T141N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Real S. A. K.	2207 East Main, Suite #2, Bismarck, ND 58501	Sec. 3-T141N-R83W
Florian Emineth	No street address of record, Mandan, ND 58554	Sec. 3-T141N-R83W
Wm. M. Mutz	No street address of record, Mandan, ND 58554	Sec. 3-T141N-R83W
William K. Engelter	202 15th Street NW, Apt. 6, Mandan ND 58554-2075	Sec. 3-T141N-R83W
Great Northern Properties Limited Partnership Attn: Steven K. Shirley	1101 N. 27th Street, Suite 201, Billings, MT 59101	Sec. 3-T141N-R83W
Meridian Minerals Company	5613 DTC Parkway, Suite 1100, Englewood, CO 80111	Sec. 3-T141N-R83W
Duane C. Anderson	740 N. 23rd Street, Bismarck, ND 58501	Sec. 3-T141N-R83W
Corrine L. Dockter	740 N. 23rd Street, Bismarck, ND 58501	Sec. 3-T141N-R83W
Vi Ann Olson	740 N. 23rd Street, Bismarck, ND 58501	Sec. 3-T141N-R83W
Gary A. Anderson	740 N. 23rd Street, Bismarck, ND 58501	Sec. 3-T141N-R83W
Robert Reinke	1144 College Drive #201, Bismarck, ND 58501	Sec. 31-T142N-R83W
Darlene Voegelé	P. O. Box 45, Stanton, ND 58571	Sec. 31-T142N-R83W
BNI Coal, Ltd. (f/k/a Baukol-Noonan, Inc.)	1637 Burnt Boat Drive, Bismarck, ND 58502	Sec. 31-T142N-R83W
Nellie Dietz	New Salem ND 58563	Sec. 31-T142N-R83W
Eldon Reinke	Eldon Reinke Estate, c/o Colleen Reinke, 13239 71st Street SE, Lisbon ND 58054	Sec. 31-T142N-R83W
Lyle Reinke	c/o Colleen Reinke, 13239 71st Street SE, Lisbon ND 58054	Sec. 31-T142N-R83W
Wayne Windhorst	P. O. Box 45, Stanton, ND 58571	Sec. 31-T142N-R83W
Spindletop Exploration Company, Inc.	P. O. Box 50787, Midland, TX 79710-0787	Sec. 31-T142N-R83W
Estate of Elizabeth Meader, deceased	116 Dix Ave., Kingsbury, NY 12809	Sec. 31-T142N-R83W
Estate of Mildred Doyle, deceased	6 Tower Street, Red Hook, NY 12571	Sec. 31-T142N-R83W
Shirley A. Kilgour	6 Tower Street, Red Hook, NY 12571	Sec. 31-T142N-R83W
Denis A. Doyle	9 Spencer Drive, Red Hook, NY 12571	Sec. 31-T142N-R83W
C. D. Griggs	230 Park Avenue, New York, NY 10169	Sec. 31-T142N-R83W
Lebert Lesch	Rt. 1, Box 134, Sheridan, WY 82801	Sec. 31-T142N-R83W
Lavern Heid	New Salem, ND 58563	Sec. 31-T142N-R83W
Carl Schwalbe	HC 2 Box 258, Center, ND 58530	Sec. 2-T141N-R83W
Rolland Schwalbe	HC 2 Box 258, Center, ND 58530	Sec. 2-T141N-R83W
Loren Schwalbe	603 3rd Ave. NE, Mandan, ND 58554	Sec. 2-T141N-R83W
State of North Dakota N.D. Dept. of Trust Lands	1707 N 9th St, Bismarck, ND 58501-5523	Sec. 2-T141N-R83W
United States of America	Unknown address	Sec. 2-T141N-R83W
Alan Schwalbe	3175 27th Street, Center, ND 58530	Sec. 10-T141N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Gertrude Schwalbe Estate c/o Susan Bohn, PR	16710 NE 41st Street, Redmond, WA 98052	Sec. 10-T141N-R83W
United States of America	Unknown address	Sec. 10-T141N-R83W
Duane C. Anderson	1321 Whispering Hill, Ada, OK 74820	Sec. 10-T141N-R83W
Corrine L. Dockter	624 S Hannifin Street; Apt. 3, Bismarck, ND 58504	Sec. 10-T141N-R83W
Vi Ann Olson	2130 27th Avenue S, Grand Forks, ND 58201	Sec. 10-T141N-R83W
Gary A. Anderson	315 Olier Avenue N, Center, ND 58530	Sec. 10-T141N-R83W
Delmar Hagerott	3170 27th Street, Center, ND 58530	Sec. 10-T141N-R83W
Delvin Bueligen/Delvin Bueligen and Jill Bueligen, as joint tenant	709A 3rd Ave. SE, Mandan, ND 58554	Sec. 10-T141N-R83W
Lowell Bueligen/Lowell Bueligen and Tammy Bueligen, as joint tenants	13621 Homestead Lane, Riverton, UT 84065	Sec. 10-T141N-R83W
Rodella Hausauer/Rodella Hausauer and Barry Hausauer, as joint tenants	1611 Castillian Way, Mundelein, IL 60060	Sec. 10-T141N-R83W
James Orgaard	9589 Brentford Drive, Highlands Ranch, CO 80126	Sec. 10-T141N-R83W
Clifford Orgaard	11839 Forada Beach Road SE, Unit A, Alexandria, MN 56308	Sec. 10-T141N-R83W
Michael Orgaard	3010 27th Street, Center, ND 58530	Sec. 10-T141N-R83W
Steven Orgaard	2935 Manitoba Lane, Bismarck, ND 58501	Sec. 10-T141N-R83W
Arline Orgaard	2935 Manitoba Lane, Bismarck, ND 58501	Sec. 10-T141N-R83W
Lynn C. Orgaard	2935 Manitoba Lane, Bismarck, ND 58501	Sec. 10-T141N-R83W
Norlan Hagerott	744 Lake Avenue, Ortonville, MN 56278	Sec. 10-T141N-R83W
Dollie Hagerot	744 Lake Avenue, Ortonville, MN 56278	Sec. 10-T141N-R83W
Albert Hagerott	3190 27th St, Center, ND 58530-9559	Sec. 10-T141N-R83W
Mary Hagerott	Mary Hagerott Estate, c/o Justin Hagerott, 3192 27th Street SW, Center ND 58530	Sec. 10-T141N-R83W
Robert Edward Hagerott and Margaret Ruth Hagerott, Trustees, or their successors in trust, of the Robert Edward Hagerott Revocable Trust, dated February 14, 1997	86 Warren Street, Needham, MA 02492	Sec. 10-T141N-R83W
Edward C. Hagerott and Rosemary T. Hagerott, Trustees, or their successors in trust, under the Edward C. Hagerott and Rosemary T. Hagerott Living Trust dated April 29, 1999	136 West Bonita Avenue, Sierra Madre, CA 91024	Sec. 10-T141N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
James Richard Keddy and Margaret R. Keddy, and successors, as Trustees of the Keddy Family Trust, dated January 14, 1994	16331 Serenade Lane, Huntington Beach, CA 92674	Sec. 10-T141N-R83W
Alvin Hagerott	HC2 Box 244, Center ND 58530	Sec. 10-T141N-R83W
Thomas Price	1211 Imperial Dr, Bismarck, ND 58504-7570 AND 115 Lakeview Dr, Watford City, ND 58854-7810 AND PO Box 96, Wolverton, MN 56594-0096 AND PO Box 631, Spencer, IN 47460-0631	Sec. 10-T141N-R83W
Dorothy L. Keck, Trustee of the Albert E. and Dorothy L. Keck Family Trust, dated July 21, 1989	1256 Cain Lane, Escondido, CA 92027	Sec. 10-T141N-R83W
Grace Ellen Janssen	Center, ND 58530	Sec. 10-T141N-R83W
AgriBank, FCB f/k/a The Federal Land Bank and Farm Credit Bank of Saint Paul	375 Jackson Street, P.O. Box 64949, St. Paul, MN 55164-0949	Sec. 10-T141N-R83W
Alan Schwalbe	3175 27th Street, Center, ND 58530	Sec. 11-T141N-R83W
Great Northern Properties L.P.	1415 Louisiana Street, Suite 2400, Houston, TX 77002-7361	Sec. 11-T141N-R83W
Meridian Minerals Company	5613 DTC Parkway, Suite 1100, Englewood, CO 80111	Sec. 11-T141N-R83W
State of North Dakota - Board of University and School Lands	1707 N 9th Street, Bismarck, ND 58501-5523	Sec. 11-T141N-R83W
Julie Hatzenbihler	P. O. Box 325, Center, ND 58530	Sec. 11-T141N-R83W
Rodney J. Hatzenbihler	2660 30th Avenue, Center, ND 58530	Sec. 11-T141N-R83W
Nancy Henke	P. O. Box 90, Hazen, ND 58545	Sec. 11-T141N-R83W
Bonnie Schwab	3203 Mink Avenue, Gillette, WY 82716	Sec. 11-T141N-R83W
Peggy Gobar	504 Garden Avenue NW, West Fargo, ND 58078	Sec. 11-T141N-R83W
Annette Hatzenbihler	310 W Tonk, Gillette, WY 82718	Sec. 11-T141N-R83W
Brent Hatzenbihler	310 W Tonk, Gillette, WY 82718	Sec. 11-T141N-R83W
Randy Hatzenbihler	P. O. Box 325, Center, ND 58530	Sec. 11-T141N-R83W
Janet K. Dohrmann and Jamie A. Fast, as Co-Trustees of The Opp Family Mineral Trust	9721 31st Street SW, Taylor, ND 58656	Sec. 18-T141N-R83W
State of North Dakota - Dept. of Trust Lands	1707 N 9th Street, Bismarck, ND 58501	Sec. 18-T141N-R83W
Wayne Reuther	4746 Glenwood Drive, Bismarck, ND 58504	Sec. 18-T141N-R83W
Kent Reuther	3610 27th St. SW, New Salem, ND 58563	Sec. 18-T141N-R83W
Keith Reuther	3594 27th St. SW, New Salem, ND 58563	Sec. 18-T141N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Karen Shulz	13720 Chamy Dr., Reno, NV 89521	Sec. 18-T141N-R83W
Jerald Reuther	405 E. Denver Avenue, Bismarck, ND 58503	Sec. 18-T141N-R83W
Martha Reuther	Martha Reuther Estate, c/o Jerald Reuther, 405 E Denver Avenue, Bismarck ND 58503 AND Martha Reuther Estate, c/o Jerald Reuther, New Salem ND 58563	Sec. 18-T141N-R83W
Larry F. Schmidt and Virginia Schmidt, as joint tenants	2631 35th Ave. SW Center ND 58530	Sec. 18-T141N-R83W
Peter Pflieger Jr.	No address of record	Sec. 18-T141N-R83W
Anton Pflieger and Helen Pflieger	105 Division Street NW, Mandan, ND 58554	Sec. 18-T141N-R83W
LouAnn Nider	824 Lohstreter Road, Mandan, ND 58554	Sec. 18-T141N-R83W
Carol Pflieger Anderson	734 Aspen Place, Bismarck, ND 58503	Sec. 18-T141N-R83W
Sandra Ohlhauser	1829 San Diego Drive, Bismarck, ND 58504	Sec. 18-T141N-R83W
Sherry Marentette	7417 Marble Ridge, Austin, TX 78747	Sec. 18-T141N-R83W
Kari Ann Pflieger Warner	411 6th Avenue NW, Mandan, ND 58554	Sec. 18-T141N-R83W
Marla Brown	28925 North Red Bloom Court, Wittmann, AZ 85361	Sec. 18-T141N-R83W
Holli K. Taylor	28827 N. 254th Lane, Wittmann, AZ 85361	Sec. 18-T141N-R83W
Myra Buntin	19425 Lower Territory Road, Prescott, AZ 86305	Sec. 18-T141N-R83W
Darrell Ray Buntin III	P.O. Box 167, Chino Valley, AZ 86323	Sec. 18-T141N-R83W
Amanda Marie Minick	4332 S. Fireside Trail, Gilbert, AZ 85297	Sec. 18-T141N-R83W
Lisa F. Pulse, as a purported heir to Angeline Bonogofsky, deceased	405 William Street, Miles City MT 59301-2336	Sec. 18-T141N-R83W
Donald Perry Bonogofsky, as a purported heir to Angeline Bonogofsky, deceased	1117 Palmer Street, Miles City, MT 59301	Sec. 18-T141N-R83W
Gary Blase Bonogofsky, as a purported heir to Angeline Bonogofsky, deceased	1117 Palmer Street, Miles City, MT 59301	Sec. 18-T141N-R83W
Brittany E. Bonogofsky	1820 N. Merriam Street, Miles City, MT 59301	Sec. 18-T141N-R83W
Duane J. Siegel	C65 100 3rd Street SW, Mandan, ND 58554	Sec. 18-T141N-R83W
Susan Jones	33800 NE Kern Court, Scappoose, OR 97056	Sec. 18-T141N-R83W
Larry F. Schmidt and Virginia Schmidt, as joint tenants	2631 35th Avenue SW, Center, ND 58530	Sec. 18-T141N-R83W
Dallas Engineering, Inc.	P. O. Box 80707, Fairbanks, AK 99708	Sec. 18-T141N-R83W
Breene Associates	P. O. Box 1773, Bismarck, ND 58501	Sec. 18-T141N-R83W
Carolyn Files	P.O. Box 154, Bunn, NC 27508	Sec. 18-T141N-R83W
Robert Files	1720-1/2 Reed Avenue, San Diego, CA 92109	Sec. 18-T141N-R83W
Richard Files	1720-1/2 Reed Avenue, San Diego, CA 92109	Sec. 18-T141N-R83W
Kurt Files	143 Lake Royale, Louisburg, NC 27549	Sec. 18-T141N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Penney Files	3387 West Silver Springs Boulevard, Lot 13, Ocala, FL 34475	Sec. 18-T141N-R83W
Erika Files Hilliard	HC 5, Box 103-1, Gainesville, MO 65655	Sec. 18-T141N-R83W
J.C. Fore	303 S Okfuskee Avenue, Wewoka, OK 74884	Sec. 18-T141N-R83W
J.L. McMullen	127 N 4TH ST, Okemah OK 74859-2456 AND 215 S 5TH ST Okemah OK 74859-3808	Sec. 18-T141N-R83W
Lily Stamper	No street address of record, Okemah, OK 74859	Sec. 18-T141N-R83W
George R. McKown	No street address of record, Okemah, OK 74859	Sec. 18-T141N-R83W
Mabel M. Johnson	P. O. Box 114, Wewoka, OK 74884	Sec. 18-T141N-R83W
Gerthel B. Fore	303 S Okfuskee Avenue, Wewoka, OK 74884	Sec. 18-T141N-R83W
Mrs. O.C. Fore	303 S Okfuskee Avenue, Wewoka, OK 74884	Sec. 18-T141N-R83W
Alexander Hamilton	2nd and Francis Streets, St. Joseph, MO 64501	Sec. 18-T141N-R83W
Nick N. Kouloures	No address of record	Sec. 18-T141N-R83W
Florence L. Hedrick	324 E 3rd Street, Newton, KS 67114	Sec. 18-T141N-R83W
Albert A. Goering	P. O. Box 366, Newton, KS 67114	Sec. 18-T141N-R83W
W.T. Brown	No street address of record, Newton, KS 67114	Sec. 18-T141N-R83W
Dean E. Stucky and O. Jean Stucky, as joint tenants	901 North Walnut, Medicine Lodge, KS 67104	Sec. 18-T141N-R83W
PEC Minerals LP	14860 Montfort Drive, Suite 209, Dallas, TX 75254	Sec. 18-T141N-R83W
Walter Duncan, Inc.	100 Park Avenue, Suite 1200, Oklahoma City, OK 73102-8006	Sec. 18-T141N-R83W
Black Stone Minerals Company, L.P.	1001 Fannin, Suite 2020, Houston, TX 77002-6709	Sec. 18-T141N-R83W
Barbara Endres	11449 SW 68th Court, Ocala, FL 34476	Sec. 18-T141N-R83W
Ellen Emley	6871 South Spotswood Street, Littleton, CO 80120	Sec. 18-T141N-R83W
Robert J. Mosbrucker	P. O. Box 745, Bothell, WA 98041	Sec. 19-T141N-R83W
Winfred Keller	728 Custer Drive, Mandan, ND 58554	Sec. 19-T141N-R83W
Douglas A. Keller, Trustee of the Winfrid and Alice Keller Family Trust	913 Saint Thomas Trail, Mandan, ND 58554	Sec. 19-T141N-R83W
Jerald Reuther	405 E. Denver Avenue, Bismarck, ND 58503	Sec. 19-T141N-R83W
Wayne Reuther	4746 Glenwood Drive, Bismarck, ND 58504	Sec. 19-T141N-R83W
Kent Reuther	3610 27th Street SW, New Salem, ND 58563	Sec. 19-T141N-R83W
Keith Reuther	3594 27th Street SW, New Salem, ND 58563	Sec. 19-T141N-R83W
Karen Shulz	13720 Chamy Drive, Reno, NV 89521	Sec. 19-T141N-R83W
Charles H. Kuether	Route #1, Box 45, New Salem, ND 58563	Sec. 19-T141N-R83W
Charles H. Kuether	3555 28th Street, New Salem, ND 58563	Sec. 19-T141N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Robert A Fryhling and Janice F. Fryhling, Trustees of the Fryhling Family Trust, dated August 15, 2002	2595 Calle Tres Lomas, San Diego, CA 92139	Sec. 19-T141N-R83W
Lila Wilson	Route #1, Box 45, New Salem, ND 58563	Sec. 19-T141N-R83W
Lois Hohimer	Route #1, Box 45, New Salem, ND 58563	Sec. 19-T141N-R83W
Madalyn Kraft	Route #1, Box 45, New Salem, ND 58563	Sec. 19-T141N-R83W
Central Dakota Humane Society	2104 37th Street, Mandan, ND 58554	Sec. 19-T141N-R83W
BNI Coal, Ltd.	2360 35th Avenue SW, Center, ND 58530-9499	Sec. 19-T141N-R83W
Earl Bodner	No address of record	Sec. 19-T141N-R83W
Erick G. Larson	50 Avalon Drive – Unit 7323, Milford CT 06460-8957	Sec. 19-T141N-R83W
Jack R. Hatzenbuhler and Helen Hatzenbuhler	3475 31st Street, Mandan, ND 58554	Sec. 27-T141N-R83W
Edward J. Koch	3359 Campstool Road, Cheyenne, WY 82007	Sec. 27-T141N-R83W
Randy L. Messer	3000 14th Avenue SE, Mandan, ND 58554	Sec. 27-T141N-R83W
Jacey Lee Messer	3000 14th Avenue SE, Mandan, ND 58554	Sec. 27-T141N-R83W
Gregory M. Messer	116 Pheasant Street, Bismarck, ND 58504	Sec. 27-T141N-R83W
Jennifer M. Messer	3000 14th Avenue SE, Mandan, ND 58554	Sec. 27-T141N-R83W
Jamie N. Messer	3000 14th Avenue SE, Mandan, ND 58554	Sec. 27-T141N-R83W
Jesse C. Messer	3000 14th Avenue SE, Mandan, ND 58554	Sec. 27-T141N-R83W
Ronald F. Messer	36 Santee Road, Lincoln, ND 58504	Sec. 27-T141N-R83W
Heather A. Messer	36 Santee Road, Lincoln, ND 58504	Sec. 27-T141N-R83W
Ashley M. Messer	36 Santee Road, Lincoln, ND 58504	Sec. 27-T141N-R83W
Debra L. Haugen	4010 Morning Star Drive S, P. O. Box 235, Mandan, ND 58554	Sec. 27-T141N-R83W
Dominic J. Haugen	4010 Morning Star Drive S, P. O. Box 235, Mandan, ND 58554	Sec. 27-T141N-R83W
Dayton L. Haugen	4010 Morning Star Drive S, P. O. Box 235, Mandan, ND 58554	Sec. 27-T141N-R83W
Magdalena Koch	1205 Sunset Drive, Mandan, ND 58554	Sec. 27-T141N-R83W
John R. Hatzenbuhler and Ida Hatzenbuhler, as joint tenants	Route 1, Mandan, ND 58554	Sec. 27-T141N-R83W
Roberts' Royalty LLC	12239 Treeview Lane, Farmers Branch, TX 75234-7809	Sec. 27-T141N-R83W
James H. Luther Royalty, LLC	717 S View Terrace, Alexandria, VA 22314	Sec. 27-T141N-R83W
BM Marcus Royalty LLC	3948 SW Greencastle Avenue, Oxford, IA 52322	Sec. 27-T141N-R83W
Mary Langdon	11707 Monica Lane, Houston, TX 77024	Sec. 27-T141N-R83W
Martha Bauman	1513 Gaston, Austin, TX 78703	Sec. 27-T141N-R83W
El Campo Energy Partners, LLC	8815 Chalk Knoll Drive, Austin, TX 78735	Sec. 27-T141N-R83W
Graham Shinnick	No street address or zip code of record, Detroit, MI	Sec. 27-T141N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Robert Moody, Trustee of the Alice H. Cordes Revocable Trust, dated January 11, 2007	2343 E Sierra Street, Phoenix, AZ 85028	Sec. 27-T141N-R83W
Jane Z. Hooker	4743 N 54th Street, Phoenix, AZ 85018-1905	Sec. 27-T141N-R83W
V. G. Perry	No street address, Detroit, MI 48127	Sec. 27-T141N-R83W
United States of America	No address of record	Sec. 22-T141N-R83W
Delmar Hagerott	3170 27th Street, Center, ND 58530	Sec. 22-T141N-R83W
Delvin Bueligen and Jill Bueligen	709A 3rd Ave. SE, Mandan, ND 58554	Sec. 22-T141N-R83W
Rodella Hausauer and Barry Hausauer	1611 Castillian Way, Mundelein, IL 60060	Sec. 22-T141N-R83W
Lowell Bueligen and Tammy Bueligen	13621 Homestead Lane, Riverton, UT 84065	Sec. 22-T141N-R83W
James Orgaard	9589 Brentford Drive, Highlands Ranch, CO 80126	Sec. 22-T141N-R83W
Clifford Orgaard	11839 Forada Beach Road SE; Unit A, Alexandria, MN 56308	Sec. 22-T141N-R83W
Michael Orgaard	3010 27th Street, Center, ND 58530	Sec. 22-T141N-R83W
Steven Orgaard	2935 Manitoba Lane, Bismarck, ND 58501	Sec. 22-T141N-R83W
Arline Orgaard	2935 Manitoba Lane, Bismarck, ND 58501	Sec. 22-T141N-R83W
Norlan Hagerott	744 Lake Avenue, Ortonville, MN 56278	Sec. 22-T141N-R83W
Albert Hagerott	3190 27th Street, Center ND 58530-9559	Sec. 22-T141N-R83W
Mary Hagerott	Mary Hagerott Estate, c/o Justin Hagerott, 3192 27th Street SW, Center ND 58530	Sec. 22-T141N-R83W
Robert Edward Hagerott and Margaret Ruth Hagerott, Trustees, or their successors in trust, of the Robert Edward Hagerott Revocable Trust, dated February 14, 1997	86 Warren Street, Needham, MA 02492	Sec. 22-T141N-R83W
Edward C. Hagerott and Rosemary T. Hagerott, Trustees, or their successors in trust, under the Edward C. Hagerott and Rosemary T. Hagerott Living Trust dated April 29, 1999	136 West Bonita Avenue, Sierra Madre, CA 91024	Sec. 22-T141N-R83W
James Richard Keddy and Margaret R. Keddy, and successors, as Trustees of the Keddy Family Trust, dated January 14, 1994	16331 Serenade Lane, Huntington Beach, CA 92647	Sec. 22-T141N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Thomas Price	1211 Imperial Dr, Bismarck, ND 58504-7570 AND 115 Lakeview Dr, Watford City, ND 58854-7810 AND PO Box 96, Wolverton, MN 56594-0096 AND PO Box 631, Spencer, IN 47460-0631	Sec. 22-T141N-R83W
Dorothy L. Keck, Trustee of the Albert E. and Dorothy L. Keck Family Trust, dated July 21, 1989	1256 Cain Lane, Escondido, CA 92027	Sec. 22-T141N-R83W
Grace Ellen Janssen	Center, ND 58530	Sec. 22-T141N-R83W
Jack R. Hatzenbuhler and Helen Hatzenbuhler	3475 31st Street, Mandan, ND 58554	Sec. 22-T141N-R83W
Edward J. Koch	3359 Campstool Road, Cheyenne, WY 82007	Sec. 22-T141N-R83W
Randy L. Messer	3000 14th Avenue SE, Mandan, ND 58554	Sec. 22-T141N-R83W
Jacey Lee Messer	3000 14th Avenue SE, Mandan, ND 58554	Sec. 22-T141N-R83W
Gregory M. Messer	116 Pheasant Street, Bismarck, ND 58504	Sec. 22-T141N-R83W
Jennifer M. Messer	3000 14th Avenue SE, Mandan, ND 58554	Sec. 22-T141N-R83W
Jamie N. Messer	3000 14th Avenue SE, Mandan, ND 58554	Sec. 22-T141N-R83W
Jesse C. Messer	3000 14th Avenue SE, Mandan, ND 58554	Sec. 22-T141N-R83W
Ronald F. Messer	36 Santee Road Lincoln, ND, 58504	Sec. 22-T141N-R83W
Heather A. Messer	36 Santee Road Lincoln, ND, 58504	Sec. 22-T141N-R83W
Ashley M. Messer	36 Santee Road Lincoln, ND, 58504	Sec. 22-T141N-R83W
Debra L. Haugen	4010 Morning Star Drive S, P. O. Box 235, Mandan, ND 58554	Sec. 22-T141N-R83W
Dominic J. Haugen	4010 Morning Star Drive S, P. O. Box 235, Mandan, ND 58554	Sec. 22-T141N-R83W
Dayton L. Haugen	4010 Morning Star Drive S, P. O. Box 235, Mandan, ND 58554	Sec. 22-T141N-R83W
Magdalena Koch	1205 Sunset Drive, Mandan, ND 58554	Sec. 22-T141N-R83W
John R. Hatzenbuhler and Ida Hatzenbuhler, as joint tenants	Route 1, Mandan, ND 58554	Sec. 22-T141N-R83W
Roberts' Royalty LLC	12239 Treeview Lane, Farmers Branch, TX 75234-7809	Sec. 22-T141N-R83W
James H. Luther Royalty, LLC	717 S View Terrace, Alexandria, VA 22314	Sec. 22-T141N-R83W
BM Marcus Royalty LLC	3948 SW Greencastle Avenue, Oxford, IA 52322	Sec. 22-T141N-R83W
Mary Langdon	11707 Monica Lane, Houston, TX 77024	Sec. 22-T141N-R83W
Martha Bauman	1513 Gaston, Austin, TX 78703	Sec. 22-T141N-R83W
El Campo Energy Partners, LLC	8815 Chalk Knoll Drive, Austin, TX 78735	Sec. 22-T141N-R83W
Graham Shinnick	No street address, Detroit, MI 48127	Sec. 22-T141N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Robert Moody, Trustee of the Alice H. Cordes Revocable Trust, dated January 11, 2007	2343 E Sierra Street, Phoenix, AZ 85028	Sec. 22-T141N-R83W
Jane Z. Hooker	4743 N 54th Street, Phoenix, AZ 85018-1905	Sec. 22-T141N-R83W
V. G. Perry	No street address, Detroit, MI 48127	Sec. 22-T141N-R83W
Jolene Berger	3004 Manchester Street, Bismarck, ND 58504	Sec. 1-T141N-R84W
Travis Klatt and Jessica Klatt, as joint tenants	2438 37th Ave. SW, Center, ND 58530	Sec. 1-T141N-R84W
Gary Leinius	204 Hager Avenue, Stanton ND 58571 AND 4958 Highway 200, Hazen ND 58545	Sec. 1-T141N-R84W
State of North Dakota - Dept. of Trust Lands	1707 N 9th Street, Bismarck, ND 58501	Sec. 1-T141N-R84W
Red Crown Royalties, LLC	1490 W. Canal Court, Suite 3000, Littleton, CO 80120	Sec. 1-T141N-R84W
Ida Schwable	HC02 Box 258, Center, ND 58530	Sec. 1-T141N-R84W
Alvin Hagerott	HC2 Box 244, Center, ND 58530	Sec. 1-T141N-R84W
Ernst R. Lueneburg	2903 Manitoba Lane, Bismarck, ND 58501	Sec. 1-T141N-R84W
Glacier Park Company	801 Cherry Street, Fort Worth, TX 76102	Sec. 1-T141N-R84W
Frase-Tucker Resources, LLC	P.O. Box 994486, Redding, CA 96099	Sec. 1-T141N-R84W
Tenneco Oil Company	P.O. Box 2511, Houston, TX 77252	Sec. 1-T141N-R84W
Douglas D. Doll and Deberra K. Doll	3901 Faye Avenue N, Mandan, ND 58554	Sec. 20-T141N-R83W
Becky Jo Lemar	798 San Angelo Drive, Bismarck, ND 58503	Sec. 20-T141N-R83W
Wendy April Wittenberg	3032 Ontario Lane, Bismarck, ND 58503	Sec. 20-T141N-R83W
Danielle Kae Borseth	5025 Hitchcock Drive, Bismarck, ND 58503	Sec. 20-T141N-R83W
James D. Pazdernik and Bonita Pazdernik	3487 37th Avenue, New Salem, ND 58563	Sec. 20-T141N-R83W
Thomas Pazdernik	2582 Windsor Drive N, Mandan, ND 58554	Sec. 20-T141N-R83W
Matthew Pazdernik	2445 37th Street, Mandan, ND 58554	Sec. 20-T141N-R83W
Theresa Moravec	921 Mouton Avenue, Bismarck, ND 58505	Sec. 20-T141N-R83W
Michael Pazdernik	P. O. Box 194, New Salem, ND 58563	Sec. 20-T141N-R83W
Mark Pazdernik	22 3rd Street S, Carrington, ND 58421	Sec. 20-T141N-R83W
Joseph Edwin Marcy	2133 SE 57th Avenue, Portland, OR 97214	Sec. 20-T141N-R83W
Nancy L. Carr	219 Mariners Way, Savannah, GA 31419-9308	Sec. 20-T141N-R83W
Charles L. Marsters	3903 Gershwin Avenue N, St. Paul, MN 55128-3010	Sec. 20-T141N-R83W
Beverly R. Buttram	5176 N Blackbird Way, Boise, ID 83714-1780	Sec. 20-T141N-R83W
Sandra Kaye Gish	1654 SW Sagebrush Court, Dallas, TX 97338-1262	Sec. 20-T141N-R83W
Michael Charles Marsters	3920 Miranda Drive, Paris, TX 75462-6648	Sec. 20-T141N-R83W
David S. Marsters	4205 Saint Andrews Place, New Albany, IN 47150-9691	Sec. 20-T141N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Ronald P. Tuning	13300 NE Whitlow Lane, Newberg, OR 97132-6723	Sec. 20-T141N-R83W
Daniel R. Cottrell, Surviving Trustee of The Cottrell Trust, a revocable living trust, dated September 26, 1996, as restated on August 25, 2014	8330 Cason Road, Unit 219, Gladstone, OR 97027	Sec. 20-T141N-R83W
L. D. Jenkins c/o Gentry, LLC	4216 North Portland, Suite 104, Oklahoma City, OK 73112	Sec. 20-T141N-R83W
Willow Point Corporation c/o Gentry, LLC	4216 North Portland, Suite 104, Oklahoma City, OK 73112	Sec. 20-T141N-R83W
Gentry, LLC	4216 North Portland, Suite 104, Oklahoma City, OK 73112	Sec. 20-T141N-R83W
Daniel Landeis and Carol Landeis	2735 Boundary Road, Bismarck, ND 58503	Sec. 20-T141N-R83W
Jessica Oakland	2218 LaForrest, Bismarck, ND 58501	Sec. 20-T141N-R83W
Jonica Norick	615 East Wachter Avenue, Bismarck, ND 58504	Sec. 20-T141N-R83W
Judy Dick and Brian T. Dick	8948 Carr Circle, Broomfield, CO 80021	Sec. 20-T141N-R83W
Jodi Gragg	4487 South Ireland Lane, Aurora, Co 80015	Sec. 20-T141N-R83W
Jeremiah Bigelow	8948 Carr Circle, Broomfield, CO 80021	Sec. 20-T141N-R83W
Benjamin Bigelow	8948 Carr Circle, Broomfield, CO 80021	Sec. 20-T141N-R83W
Garrett Dick	598 East Dry Creek Place, Littleton, CO 80122	Sec. 20-T141N-R83W
Mandy Davis	8394 South Everett Way, #F, Littleton, CO 80128	Sec. 20-T141N-R83W
Roger Landeis and Diane Landeis	7752 South Columbine Street, Centennial, CO 80122	Sec. 20-T141N-R83W
Tamara Landeis	2836 Mount Carmel Road, Newnan, GA 30263	Sec. 20-T141N-R83W
Randy Landeis and Susan Corine	11096 W 104th Drive, Westminster, CO 80021	Sec. 20-T141N-R83W
Cory Lee Landeis	11625 Community Center Drive, Apt. 1311, Northglenn, CO 80233	Sec. 20-T141N-R83W
Carisa Nicole Landeis	436 North 5th Avenue, Brighton, CO 80601	Sec. 20-T141N-R83W
Donald Roerich and Justine Roerich	1131 Cannon Lane, Washburn, ND 58577	Sec. 20-T141N-R83W
Mason Roerich	1131 Cannon Lane, Washburn, ND 58577	Sec. 20-T141N-R83W
Memphis Roerich	1131 Cannon Lane, Washburn, ND 58577	Sec. 20-T141N-R83W
Katherine Mosbrucker	404 NW 13th Street, Mandan, ND 58554	Sec. 20-T141N-R83W
Ralph P. Kautzman	Center, ND 58530 AND 1408 Central Avenue, Mandan ND 58554	Sec. 20-T141N-R83W
Irene Kautzman	1408 Central Avenue, Mandan, ND 58554	Sec. 20-T141N-R83W
Robert J. Mosbrucker	P. O. Box 745, Bothell, WA 98041	Sec. 20-T141N-R83W
Winfrid Keller	728 Custer Drive, Mandan, ND 58554	Sec. 20-T141N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Douglas A. Keller, Trustee of the Winfrid and Alice Keller Family Trust	913 Saint Thomas Trail, Mandan, ND 58554	Sec. 20-T141N-R83W
Dale P. Pfliger and Judy Pfliger	806 Tower Place, Mandan, ND 58554	Sec. 20-T141N-R83W
Mathias Pfliger	2508 10th Avenue SE, Mandan, ND 58554	Sec. 20-T141N-R83W
Aaron Pfliger	708 17th Street NW, Mandan, ND 58554	Sec. 20-T141N-R83W
Thomas Pfliger	806 Tower Place, Mandan, ND 58554	Sec. 20-T141N-R83W
Anton Pfliger and Helen Pfliger	105 Division Street NW, Mandan, ND 58554	Sec. 20-T141N-R83W
LouAnn Nider	824 Lohstreter Road, Mandan, ND 58554	Sec. 20-T141N-R83W
Carol Pfliger Anderson	734 Aspen Place, Bismarck, ND 58503	Sec. 20-T141N-R83W
Sandra Olhauser	1829 San Diego Drive, Bismarck, ND 58504	Sec. 20-T141N-R83W
Sherry Marentette	7417 Marble Ridge, Austin, TX 78747	Sec. 20-T141N-R83W
Kari Ann Pfliger Warner	411 6th Avenue NW, Mandan, ND 58554	Sec. 20-T141N-R83W
Anton Pfliger and Helen Pfliger	105 Division Street NW, Mandan, ND 58554	Sec. 28-T141N-R83W
LouAnn Nider	824 Lohstreter Road, Mandan, ND 58554	Sec. 28-T141N-R83W
Carol Pfliger Anderson	734 Aspen Place, Bismarck, ND 58503	Sec. 28-T141N-R83W
Sandra Olhauser	1829 San Diego Drive, Bismarck, ND 58504	Sec. 28-T141N-R83W
Sherry Marentette	7417 Marble Ridge, Austin, TX 78747	Sec. 28-T141N-R83W
Kari Ann Pfliger Warner	411 6th Avenue NW, Manda, ND 58554	Sec. 28-T141N-R83W
Marla Brown	28925 North Red Bloom Court, Whitman, AZ 85361	Sec. 28-T141N-R83W
Holli K. Taylor	28827 N 254th Lane, Whitman, AZ 85361	Sec. 28-T141N-R83W
Myra Buntin	19425 Lower Territory Road, Prescott, AZ 86305	Sec. 28-T141N-R83W
Darrell Ray Buntin III	P. O. Box 167, Chino Valley, AZ 86323	Sec. 28-T141N-R83W
Marie Pfliger	717 Solano Drive, Prescott, AZ86301	Sec. 28-T141N-R83W
Dale P. Pfliger and Judy Pfliger	806 Tower Place, Mandan, ND 58554	Sec. 28-T141N-R83W
Mathias Pfliger	2508 10th Avenue SE, Mandan, ND 58554	Sec. 28-T141N-R83W
Aaron Pfliger	708 17th Street NW, Mandan, ND 58554	Sec. 28-T141N-R83W
Thomas Pfliger	806 Tower Place, Mandan, ND 58554	Sec. 28-T141N-R83W
Clementine Freisz	710 Pine Avenue, New Salem, ND 58563	Sec. 28-T141N-R83W
Sandra K. Orgaard	2810 26th Street, Center, ND 58530	Sec. 28-T141N-R83W
Roger A. Friesz	797 7th Street, Idaho Falls, ID 83401	Sec. 28-T141N-R83W
Duane M. Friesz	4465 34th Street, New Salem, ND 58563	Sec. 28-T141N-R83W
Karen M. Porsborg	2720 37th Avenue SW, New Salem, ND 58563	Sec. 28-T141N-R83W
Michael J. Friesz	3463 County Road 87, New Salem, ND 58563	Sec. 28-T141N-R83W
Audrey A. Peterson	12719 Doris Drive, Black Hawk, SD 57718	Sec. 28-T141N-R83W
Marshall & Winston, Inc.	P. O. Box 50880, Midland, TX 79710-0880	Sec. 28-T141N-R83W
Hancock Enterprises	P. O. Box 2527, Billings, MT 59103	Sec. 28-T141N-R83W
Fortin Enterprises, Inc.	P.O. Box 3129, Palm Beach, FL 33480	Sec. 28-T141N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
DeKalb Energy Company	1625 Broadway Suite 1300, Denver, CO 80202-4713	Sec. 28-T141N-R83W
Anton Pflieger and Helen Pflieger	105 Division Street NW, Mandan, ND 58554	Sec. 21-T141N-R83W
LouAnn Nider	824 Lohstreter Road, Mandan, ND 58554	Sec. 21-T141N-R83W
Carol Pflieger Anderson	734 Aspen Place, Bismarck, ND 58503	Sec. 21-T141N-R83W
Sandra Olhauser	1829 San Diego Drive, Bismarck, ND 58504	Sec. 21-T141N-R83W
Sherry Marentette	7417 Marble Ridge, Austin, TX 78747	Sec. 21-T141N-R83W
Kari Ann Pflieger Warner	411 6th Avenue NW, Mandan, ND 58554	Sec. 21-T141N-R83W
Marla Brown	28925 North Red Bloom Court, Whitman, AZ 85361	Sec. 21-T141N-R83W
Holli K. Taylor	28827 N 254th Lane, Whitman, AZ 85361	Sec. 21-T141N-R83W
Myra Buntin	19425 Lower Territory Road, Prescott, AZ 86305	Sec. 21-T141N-R83W
Darrell Ray Buntin III	P. O. Box 167, Chino Valley, AZ 86323	Sec. 21-T141N-R83W
Amanda Marie Minick	4332 S Fireside Trail, Gilbert, AZ 85297	Sec. 21-T141N-R83W
Marie Pflieger	717 Solano Drive, Prescott, AZ 86301 AND 1487 Horseshoe Bend Drive, #37, Camp Verde, AZ 86322	Sec. 21-T141N-R83W
Delmar Hagerott	3170 27th Street, Center, ND 58530	Sec. 21-T141N-R83W
Delvin Bueligen and Jill Bueligen	709A 3rd Ave. SE, Mandan, ND 58554	Sec. 21-T141N-R83W
Lowell Bueligen and Tammy Bueligen	13621 Homestead Lane, Riverton, UT 84065	Sec. 21-T141N-R83W
Rodella Hausauer and Barry Hausauer	1611 Castillian Way, Mundelein, IL 60060	Sec. 21-T141N-R83W
James Orgaard	9589 Brentford Drive, Highlands Ranch, CO 80126	Sec. 21-T141N-R83W
Clifford Orgaard	11839 Forada Beach Road SE; Unit A, Alexandria, MN 56308	Sec. 21-T141N-R83W
Michael Orgaard	3010 27th Street, Center, ND 58530	Sec. 21-T141N-R83W
Steven Orgaard	2935 Manitoba Lane, Bismarck, ND 58501	Sec. 21-T141N-R83W
Arline Orgaard	2935 Manitoba Lane, Bismarck, ND 58501	Sec. 21-T141N-R83W
Norlan Hagerott	744 Lake Avenue, Ortonville, MN 56278	Sec. 21-T141N-R83W
Albert Hagerott	3190 27th Street, Center ND 58530-9559	Sec. 21-T141N-R83W
Mary Hagerott	Mary Hagerott Estate, c/o Justin Hagerott, 3192 27th Street SW, Center, ND 58530	Sec. 21-T141N-R83W
Robert Edward Hagerott and Margaret Ruth Hagerott, Trustees, or their successors in trust, of the Robert Edward Hagerott Revocable Trust, dated February 14, 1997	86 Warren Street, Needham, MA 02492	Sec. 21-T141N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Edward C. Hagerott and Rosemary T. Hagerott, Trustees, or their successors in trust, under the Edward C. Hagerott and Rosemary T. Hagerott Living Trust dated April 29, 1999	136 West Bonita Avenue, Sierra Madre, CA 91024	Sec. 21-T141N-R83W
James Richard Keddy and Margaret R. Keddy, and successors, as Trustees of the Keddy Family Trust, dated January 14, 1994	16331 Serenade Lane, Huntington Beach, CA 92647	Sec. 21-T141N-R83W
Thomas Price	1211 Imperial Dr, Bismarck, ND 58504-7570 AND 115 Lakeview Dr, Watford City, ND 58854-7810 AND PO Box 96, Wolverton, MN 56594-0096 AND PO Box 631, Spencer, IN 47460-0631	Sec. 21-T141N-R83W
Dorothy L. Keck, Trustee of the Albert E. and Dorothy L. Keck Family Trust, dated July 21, 1989	1256 Cain Lane, Escondido, CA 92027	Sec. 21-T141N-R83W
Grace Ellen Janssen	204 Juniper Dr., Bismarck, ND 58503-0292	Sec. 21-T141N-R83W
Douglas D. Doll and Deberra K. Doll	3901 Faye Avenue N, Mandan, ND 58554	Sec. 21-T141N-R83W
Becky Jo Lemar	798 San Angelo Drive, Bismarck, ND 58503	Sec. 21-T141N-R83W
Wendy April Wittenberg	3032 Ontario Lane, Bismarck, ND 58503	Sec. 21-T141N-R83W
Danielle Kae Borseth	5025 Hitchcock Drive, Bismarck, ND 58503	Sec. 21-T141N-R83W
James D. Pazdernik and Bonita Pazdernik	3487 37th Avenue, New Salem, ND 58563	Sec. 21-T141N-R83W
Thomas Pazdernik	2582 Windsor Drive N, Mandan, ND 58554	Sec. 21-T141N-R83W
Matthew Pazdernik	2445 37th Street, Mandan, ND 58554	Sec. 21-T141N-R83W
Theresa Moravec	921 Mouton Avenue, Bismarck, ND 58505	Sec. 21-T141N-R83W
Michael Pazdernik	P. O. Box 194, New Salem, ND 58563	Sec. 21-T141N-R83W
Mark Pazdernik	22 3rd Street S, Carrington, ND 58421	Sec. 21-T141N-R83W
Daniel Landeis and Carol Landeis	2735 Boundary Road, Bismarck, ND 58503	Sec. 21-T141N-R83W
Jessica Oakland	2218 LaForrest, Bismarck, ND 58501	Sec. 21-T141N-R83W
Jonica Norick	615 East Wachter Avenue, Bismarck, ND 58504	Sec. 21-T141N-R83W
Judy Dick and Brian T. Dick	8948 Carr Circle, Broomfield, CO 80021	Sec. 21-T141N-R83W
Jodi Gragg	4487 South Ireland Lane, Aurora, CO 80015	Sec. 21-T141N-R83W
Jeremiah Bigelow	8948 Carr Circle, Broomfield, CO 80021	Sec. 21-T141N-R83W
Benjamin Bigelow	8948 Carr Circle, Broomfield, CO 80021	Sec. 21-T141N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Garrett Dick	598 East Dry Creek Place, Littleton, CO 80122	Sec. 21-T141N-R83W
Mandy Davis	8394 South Everett Way, #F, Littleton, CO 80128	Sec. 21-T141N-R83W
Roger Landeis and Diane Landeis	7752 South Columbine Street, Centennial, CO 80122	Sec. 21-T141N-R83W
Tamara Landeis	2836 Mount Carmel Road, Newnan, GA 30263	Sec. 21-T141N-R83W
Randy Landeis and Susan Corine	11096 W 104th Drive, Westminster, CO 80021	Sec. 21-T141N-R83W
Cory Lee Landeis	11625 Community Center Drive, Apt. 1311, Northglenn, CO 80233	Sec. 21-T141N-R83W
Carisa Nicole Landeis	436 North 5th Avenue, Brighton, CO 80601	Sec. 21-T141N-R83W
Donald Roerich and Justine Roerich	1131 Cannon Lane, Washburn, ND 58577	Sec. 21-T141N-R83W
Mason Roerich	1131 Cannon Lane, Washburn, ND 58577	Sec. 21-T141N-R83W
Memphis Roerich	1131 Cannon Lane, Washburn, ND 58577	Sec. 21-T141N-R83W
Katherine Mosbrucker	404 NW 13th Street, Mandan, ND 58554	Sec. 21-T141N-R83W
Ralph P. Kautzman	1408 Central Avenue, Mandan, ND 58554	Sec. 21-T141N-R83W
Irene Kautzman	1408 Central Avenue, Mandan, ND 58554	Sec. 21-T141N-R83W
Mrs. Emanuel Kautzman	No address of record, Yakima WA 98901	Sec. 21-T141N-R83W
Estate of George Hagel, deceased	P.O. Box 223, Center, ND 58530	Sec. 2-T141N-R84W
City of Center Park District	No street address and zip code of record, Center ND	Sec. 2-T141N-R84W
James Hagel	746 E. 4th Ave., Kennewick, WA 99336	Sec. 2-T141N-R84W
Gene Hagel	9131 Prairie Vista Dr. NE, Albuquerque, NM 87113	Sec. 2-T141N-R84W
Kathy Lipp	4744 Thornburg Dr., Bismarck, ND 58504	Sec. 2-T141N-R84W
Loretta Rath	2606 Village Drive, Bismarck, ND 58505	Sec. 2-T141N-R84W
Julie Zahn	404 1st St. SW, Beulah, ND 58523	Sec. 2-T141N-R84W
Betty Yantzer	2745 18th St. SW, Center, ND 58530	Sec. 2-T141N-R84W
Jackie Schwab	938 Elbowoods Dr., Hazen, ND 58545	Sec. 2-T141N-R84W
Janice Matthews	P.O. Box 626, Washburn, ND 58577	Sec. 2-T141N-R84W
United States of America	No address of record	Sec. 2-T141N-R84W
Estate of Nick M. Berger, deceased	2529 37th Avenue SW, Center, ND 58530	Sec. 2-T141N-R84W
State Treasurer, as Trustee of the State of North Dakota	1707 N 9th Street, Bismarck, ND 58501	Sec. 2-T141N-R84W
Karmen Boehm	907 Nishu Place, Hazen, ND 58545	Sec. 2-T141N-R84W
Karle Boehm	1017 Fayette Drive, Hazen, ND 58545	Sec. 2-T141N-R84W
Dwight Wrantham and Linda Wrantham, as joint tenants	301 52nd St. SE, Bismarck, ND 58501	Sec. 2-T141N-R84W
Eileen Rooney Hewgley, L.L.C.	427 South Boston Avenue, Suite 304, Tulsa, OK 74103	Sec. 2-T141N-R84W
RLand, L.L.C.	401 South Boston Avenue, Suite 2400, Tulsa, OK 74103	Sec. 2-T141N-R84W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Patrick T. Rooney, Timothy P. Rooney, James Harris Rooney, and L.F. Rooney III, as Co-Trustees of The L.F. Rooney III Trust, created by the Lucy T. Rooney 1992 GST Exempt Family Trusts under Trust Agreement dated August 18, 1992	7 Spring Creek Road, Muskogee OK 74401	Sec. 2-T141N-R84W
Patrick T. Rooney, Timothy P. Rooney, James Harris Rooney, and L.F. Rooney III, as Co-Trustees of The Patrick T. Rooney Trust, created by the Lucy T. Rooney 1992 GST Exempt Family Trusts under Trust Agreement dated August 18, 1992	No address of record	Sec. 2-T141N-R84W
Patrick T. Rooney, Timothy P. Rooney, James Harris Rooney, and L.F. Rooney III, as Co-Trustees of The Timothy P. Rooney Trust, created by the Lucy T. Rooney 1992 GST Exempt Family Trusts under Trust Agreement dated August 18, 1992	7 Spring Creek Road, Muskogee OK 74401	Sec. 2-T141N-R84W
Patrick T. Rooney, Timothy P. Rooney, James Harris Rooney, and L.F. Rooney III, as Co-Trustees of The James Harris Rooney Trust, created by the Lucy T. Rooney 1992 GST Exempt Family Trusts under Trust Agreement dated August 18, 1992	7 Spring Creek Road, Muskogee OK 74401	Sec. 2-T141N-R84W
Patrick T. Rooney, Timothy P. Rooney, James Harris Rooney, and L.F. Rooney III, as Co-Trustees The Lucy Rooney Kapples Trust, created by the Lucy T. Rooney 1992 GST Exempt Family Trusts under Trust Agreement dated August 18, 1992	7 Spring Creek Road, Muskogee, OK 74401	Sec. 2-T141N-R84W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Patrick T. Rooney, Timothy P. Rooney, James Harris Rooney, and L.F. Rooney III, as Co-Trustees of The Rebecca Finch Rooney Trust, created by the Lucy T. Rooney 1992 GST Exempt Family Trusts under Trust Agreement dated August 18, 1992	7 Spring Creek Road, Muskogee, OK 74401	Sec. 2-T141N-R84W
Osprey Resources, Inc.	P.O. Box 56449, Houston, TX 77256-6449	Sec. 2-T141N-R84W
Mary Michael Genung	885 Live Oak Ridge Road, West Lake Hills, TX 78746	Sec. 2-T141N-R84W
Gonzaga University Law Dept. Scholarship	22H E. Euclid, Spokane, WA 99207	Sec. 2-T141N-R84W
J.C. Miller	508 Beacon Building, Tulsa, OK 74103	Sec. 2-T141N-R84W
Ralph M. Fahrenwald and Edna M. Fahrenwald, as joint tenants	3737 E. 45th Street, Tulsa, OK 74135	Sec. 2-T141N-R84W
Noah W. Millsap and Nell Rose Millsap, as joint tenants	1927 E. 33rd Place, Tulsa, OK 74105	Sec. 2-T141N-R84W
W.A. Dean and Fonda G. Dean, as joint tenants	1316 East 35th Place, Tulsa, OK 74105	Sec. 2-T141N-R84W
Delmar Hagerott	3170 27th Street, Center, ND 58530	Sec. 29-T141N-R83W
Delvin Bueligen and Jill Bueligen	709A 3rd Ave. SE, Mandan, ND 58554	Sec. 29-T141N-R83W
Rodella Hausauer and Barry Hausauer	1611 Castillian Way, Mundelein, IL 60060	Sec. 29-T141N-R83W
Lowell Bueligen and Tammy Bueligen	13621 Homestead Lane, Riverton, UT 84065	Sec. 29-T141N-R83W
James Orgaard	9589 Brentford Drive, Highlands Ranch, CO 80126	Sec. 29-T141N-R83W
Clifford Orgaard	11839 Forada Beach Road SE; Unit A, Alexandria, MN 56308	Sec. 29-T141N-R83W
Michael Orgaard	3010 27th Street, Center, ND 58530	Sec. 29-T141N-R83W
Steven Orgaard	2935 Manitoba Lane, Bismarck, ND 58501	Sec. 29-T141N-R83W
Arline Orgaard	2935 Manitoba Lane, Bismarck, ND 58501	Sec. 29-T141N-R83W
Norlan Hagerott	744 Lake Avenue, Ortonville, MN 56278	Sec. 29-T141N-R83W
Albert Hagerott	3190 27th Street, Center ND 58530-9559	Sec. 29-T141N-R83W
Mary Hagerott	Mary Hagerott Estate, c/o Justin Hagerott, 3192 27th Street SW, Center ND 58530	Sec. 29-T141N-R83W
Robert Edward Hagerott and Margaret Ruth Hagerott, Trustees, or their successors in trust, of the Robert Edward Hagerott Revocable Trust, dated February 14, 1997	86 Warren Street, Needham, MA 02492	Sec. 29-T141N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Edward C. Hagerott and Rosemary T. Hagerott, Trustees, or their successors in trust, under the Edward C. Hagerott and Rosemary T. Hagerott Living Trust dated April 29, 1999	136 West Bonita Avenue, Sierra Madre, CA 91024	Sec. 29-T141N-R83W
James Richard Keddy and Margaret R. Keddy, and successors, as Trustees of the Keddy Family Trust, dated January 14, 1994	16331 Serenade Lane, Huntington Beach, CA 92647	Sec. 29-T141N-R83W
Thomas Price	1211 Imperial Dr, Bismarck, ND 58504-7570 AND 115 Lakeview Dr, Watford City, ND 58854-7810 AND PO Box 96, Wolverton, MN 56594-0096 AND PO Box 631, Spencer, IN 47460-0631	
Dorothy L. Keck, Trustee of the Albert E. and Dorothy L. Keck Family Trust, dated July 21, 1989	1256 Cain Lane, Escondido, CA 92027	Sec. 29-T141N-R83W
Grace Ellen Janssen	Center, ND 58530	Sec. 29-T141N-R83W
Alvin Hagerott	HC2, Box 244, Center, ND 58530	Sec. 29-T141N-R83W
Dora Porsborg	Mandan Villa, Mandan, ND 58554	Sec. 29-T141N-R83W
Nels Porsborg	Mandan Villa, Mandan, ND 58554	Sec. 29-T141N-R83W
Dora Porsborg and Nels Porsborg c/o Kenneth Porsborg and Myron Porsborg	Route 1, Box 47A, Mandan, ND 58554	Sec. 29-T141N-R83W
Great Northern Properties LP	601 Jefferson Street; Suite 3600, Houston, TX 77002	Sec. 29-T141N-R83W
Meridian Minerals Company	5613 DTC Parkway, Suite 1100, Englewood, CO 80111	Sec. 29-T141N-R83W
Meridian Minerals Company	2919 Allen Parkway, Houston, TX 77019-2142	Sec. 29-T141N-R83W
Fern Bueligen	3022 Withers Drive, Mandan, ND 58554	Sec. 29-T141N-R83W
Steven P. Kraft and Julie F. Kraft, as joint tenants	2847 35th Avenue, New Salem, ND 58563	Sec. 29-T141N-R83W
Robert Mosbrucker	P. O. Box 745, Bothell, WA 98041	Sec. 29-T141N-R83W
Sandra Smith, Co-Trustee of the Kautzman Family Irrevocable Trust under agreement dated June 30, 2008	1320 County Road 80, Mandan, ND 58558	Sec. 29-T141N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Collette Friedt, Co-Trustee of the Kautzman Family Irrevocable Trust under agreement dated June 30, 2008	802 Wagon Trail Street, Gillette, WY 82718	Sec. 29-T141N-R83W
Stacy Kautzman, Co-Trustee of the Kautzman Family Irrevocable Trust under agreement dated June 30, 2008	9301 Wentworth Drive, Bismarck, ND 58503	Sec. 29-T141N-R83W
Jean L. Kautzman	2130 41st Avenue SW, Center, ND 58530	Sec. 29-T141N-R83W
Jay Kautzman	2024 N 5th Street, Bismarck, ND 58501	Sec. 29-T141N-R83W
Julie Frye	1853 N 23rd Street, Bismarck, ND 58501	Sec. 29-T141N-R83W
Janet Anderson	15537 East Radcliffe Place, Aurora, CO 80015	Sec. 29-T141N-R83W
Jeanine Marcolina	3938 East San Pedro, Gilbert, AZ 85234	Sec. 29-T141N-R83W
Douglas H. Kautzman	3450 County Road 138, Mandan, ND 58554	Sec. 29-T141N-R83W
Delmar Hagerott	3170 27th Street, Center, ND 58530	Sec. 13-T141N-R84W
Delvin Bueligen	709A 3rd Ave. SE, Mandan, ND 58554	Sec. 13-T141N-R84W
Rodella Hausauer	1611 Castillian Way, Mundelein, IL 60060	Sec. 13-T141N-R84W
Lowell Bueligen	13621 Homestead Lane, Riverton, UT 84065	Sec. 13-T141N-R84W
James Orgaard	9589 Brentford Drive, Highlands Ranch, CO 80126	Sec. 13-T141N-R84W
Clifford Orgaard	11839 Forada Beach Road SE; Unit A, Alexandria, MN 56308	Sec. 13-T141N-R84W
Michael Orgaard	3010 27th Street, Center, ND 58530	Sec. 13-T141N-R84W
Steven Orgaard	2935 Manitoba Lane, Bismarck, ND 58501	Sec. 13-T141N-R84W
Arline Orgaard	2935 Manitoba Lane, Bismarck, ND 58501	Sec. 13-T141N-R84W
Lynn C. Orgaard	2935 Manitoba Lane, Bismarck, ND 58501	Sec. 13-T141N-R84W
Fern Bueligen	3022 Withers Drive, Mandan, ND 58554	Sec. 13-T141N-R84W
Richard Bueligen	3022 Withers Drive, Mandan, ND 58554	Sec. 13-T141N-R84W
Norlan Hagerott	744 Lake Avenue, Ortonville, MN 56278	Sec. 13-T141N-R84W
Dollie Hagerott	744 Lake Avenue, Ortonville, MN 56278	Sec. 13-T141N-R84W
Annette Hatzenbihler	310 W Tonk, Gillette, WY 82718	Sec. 13-T141N-R84W
Nancy Henke and Dwight Henke	P. O. Box 90, Hazen, ND 58545	Sec. 13-T141N-R84W
Brent Hatzenbihler	310 W Tonk, Gillette, WY 82718	Sec. 13-T141N-R84W
Melissa Hatlestad	2372 Harmon Lane, Mandan, ND 58554	Sec. 13-T141N-R84W
Travis Henke	965 Gregory Lane, Mountain Home, ID 83647	Sec. 13-T141N-R84W
Rodney Hatzenbihler	2660 30th Avenue, Center, ND 58530	Sec. 13-T141N-R84W
State of North Dakota Dept. of Trust Lands	1707 N 9th Street, Bismarck, ND 58501	Sec. 13-T141N-R84W
Mark Erhardt	P. O. Box 132, Center, ND 58530	Sec. 13-T141N-R84W
Margaret Erhardt	3685 27th Street, New Salem, ND 58563-9617	Sec. 13-T141N-R84W
Kathryn Erhardt	P. O. Box 132, Center, ND 58530	Sec. 13-T141N-R84W
Agnes Phagan	419 Mathias Street, Taft, TX 78390	Sec. 13-T141N-R84W
Isabelle Forster	851 4th Avenue E, Dickinson, ND 58601	Sec. 13-T141N-R84W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Evangeline Bolton	1951 Carbon Ridge Street, Enumclaw, WA 98022	Sec. 13-T141N-R84W
Lorraine Bosch	851 4th Avenue E, Dickinson, ND 58601	Sec. 13-T141N-R84W
Ann Pasley	13838 162nd Avenue NE, Woodinville, WA 98072	Sec. 13-T141N-R84W
Scott Erhardt	3101 85M Avenue SW, Richardton, ND 58657	Sec. 13-T141N-R84W
Laura Kordonowy	2329 Main Street, Dickinson, ND 58601	Sec. 13-T141N-R84W
Alice Christianson	2585 Dakota Boulevard, Apt. 323, Dickinson, ND 58601	Sec. 13-T141N-R84W
Alice Frederick	Route 2 24C, Dickinson, ND 58601	Sec. 13-T141N-R84W
Marcus C. Erhardt	332 Wehrle Drive, Richardton, ND 58652	Sec. 13-T141N-R84W
Perry Erhardt	597 Twin Oaks Lane, Dallas, GA 30157	Sec. 13-T141N-R84W
Edward Erhardt	3105 85M Avenue SW, Richardton, ND 58652	Sec. 13-T141N-R84W
Wallace Erhardt	119 East Calgary Avenue, Bismarck, ND 58503	Sec. 13-T141N-R84W
Gloria Ciavarella	119 East Calgary Avenue, Bismarck, ND 58503	Sec. 13-T141N-R84W
Rose Erhardt	No street address of record, Dickinson, ND 58601	Sec. 13-T141N-R84W
Ronald P. Erhardt	No street address of record, Williston, ND 58801/58802/58803	Sec. 13-T141N-R84W
Rhoda P. Erhardt	2379 Snowshoe Court E, St. Paul, MN 55119	Sec. 13-T141N-R84W
Dorothy Mae Erhardt	Dickinson, ND 58601	Sec. 13-T141N-R84W
United States of America	No address of record	Sec. 14-T141N-R84W
Donald C. Erhard and Kathleen Erhardt	2955 37th Avenue SW, New Salem, ND 58563	Sec. 14-T141N-R84W
Lee Dresser	P. O. Box 683, Riverdale, ND 58565	Sec. 14-T141N-R84W
Yvonne Schmidt	3611 42nd Street NW, Mandan, ND 58554	Sec. 14-T141N-R84W
Raymond Schmidt, Sr. Estate	3611 42nd Street NW, Mandan, ND 58554	Sec. 14-T141N-R84W
Terrence Schmidt	515 Nottingham Drive, Bismarck, ND 58504	Sec. 14-T141N-R84W
Randall Schmidt	4817 Roughrider Circle, Mandan, ND 58554	Sec. 14-T141N-R84W
Raymond Schmidt, Jr.	5735 Highland Road, Mandan, ND 58554	Sec. 14-T141N-R84W
Marsha Strecker	P. O. Box 105, South Heart, ND 58655	Sec. 14-T141N-R84W
JoAnne Snow	329 Bedford Blvd., Bismarck, ND 58504	Sec. 14-T141N-R84W
Jeffrey Schmidt	3611 42nd Street NW, Mandan, ND 58554	Sec. 14-T141N-R84W
Margaret Schmidt	1305 2nd Street NW, Mandan, ND 58554	Sec. 14-T141N-R84W
Rose Royalty, LLC	6730 N Scottsdale Road; Ste. 270, Scottsdale, AZ 85253	Sec. 14-T141N-R84W
Cooper Land Family, LLC	460 Oak Hill Road, Chaska, MN 55318	Sec. 14-T141N-R84W
Kristoffer J. Land	12275 Berea Court, Poway, CA 92064	Sec. 14-T141N-R84W
Solveig K. Land, Trustee of the Solveig K. Land Revocable Trust Agreement, dated August 2, 2008	310 Parkway Court, Minneapolis, MN 55419	Sec. 14-T141N-R84W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Mike Golden	P. O. Box 2734, Bismarck, ND 58502	Sec. 14-T141N-R84W
A. G. Golden	P. O. Box 1853, Bismarck, ND 58502	Sec. 14-T141N-R84W
Peter Mosbrucker	No street address of record, New Salem, ND 58563	Sec. 14-T141N-R84W
Jesse L. Lackman and Darcy J. Lackman Revocable Living Trust	2647 37th Avenue SW, Center, ND 58530	Sec. 14-T141N-R84W
Raymond Mizak and Phyllis F. Mizak	794 E Gemini Place, Chandler, AZ 85249	Sec. 14-T141N-R84W
Armstrong Minerals, LLC	P. O. Box 1999, Dickinson, ND 58602	Sec. 14-T141N-R84W
Julie M. Fadden and Gordon W. Schnell, Co-Trustees of the Patrick Fadden Residuary Trust	1007 Highland Place, Bismarck, ND 58501	Sec. 14-T141N-R84W
Richard E. Haug	668 W 27th, Dickinson, ND 58601	Sec. 14-T141N-R84W
W. R. Everett	668 W 27th, Dickinson, ND 58601	Sec. 14-T141N-R84W
Michelle M. Miller	668 W 27th, Dickinson, ND 58601	Sec. 14-T141N-R84W
Dennis W. Yockim	P. O. Box 477, Williston, ND 58801	Sec. 14-T141N-R84W
Douglas C. McLeod	518 17th Street, Ste. 1525, Denver, CO 80202	Sec. 14-T141N-R84W
O. W. E. Oil Company	P. O. Box 422, Pauma Valley, CA 92061	Sec. 14-T141N-R84W
Crescent Energy, Inc.	Box 1413, Scottsdale, AZ 85252-1413	Sec. 14-T141N-R84W
TurmOil, Inc.	P. O. Box 5, Bismarck, ND 58502	Sec. 14-T141N-R84W
The Carter Investment Company	333 Clay Street, Ste. 3439, Houston, TX 77002	Sec. 14-T141N-R84W
Black Stone Minerals Company, L.P.	1001 Fannin, Ste. 2020, Houston, TX 77002	Sec. 14-T141N-R84W
William G. Seal and Marcellyn J. Seal	4662 S Troost, Tulsa, OK 74170	Sec. 14-T141N-R84W
Robert C. Simpson, Trustee of the Robert C. Simpson Living Trust created by declaration of trust dated April 5, 1999	P. O. Box 700216 Tulsa, OK, 74170-0216	Sec. 14-T141N-R84W
John Williard Forsyth c/o Benjamin Forsyth	3301 9th Street E Great Falls, MT, 59404	Sec. 14-T141N-R84W
Martha Ann Forsyth Thomas	34 Creekside Close, Nellysford, VA 22958	Sec. 14-T141N-R84W
Benjamin Ripley Forsyth	3301 9th Street E, Great Falls, MT 59404	Sec. 14-T141N-R84W
L. R. Forsyth	L. R. Boughton (f.k.a. L. R. Forsyth), 1566 Texakoma Park Road, Kingston OK 73439-9324	Sec. 14-T141N-R84W
Thomas D. Selby	P. O. Box 2344, Williston, ND 58801	Sec. 14-T141N-R84W
M. Sue Bruce and Clifford R. Bruce, Sr., as Co-Trustees of the M. Sue Bruce Declaration of Trust dated January 30, 2015	36 Greenridge Drive, Decatur, IL 62526-1404	Sec. 14-T141N-R84W
Charles F. Smith c/o Mary Sue Bruce	36 Greenridge Drive, Decatur, IL 62526-1404	Sec. 14-T141N-R84W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Al Nick	111 Church Street, Ferguson, MO 63135	Sec. 14-T141N-R84W
Al E. Nick, Trustee of the Modak Trust A	111 Church Street, Ferguson, MO 63135	Sec. 14-T141N-R84W
Michael J. Wetzell	7880 Shelbyville Road, Indianapolis, IN 45259	Sec. 14-T141N-R84W
Aqua Purple Reef, LLC	7582 Mulholland Drive, Los Angeles, CA 9004	Sec. 14-T141N-R84W
Mary Catherine Watson	8136 Bishops Lane, Indianapolis, IN 46217	Sec. 14-T141N-R84W
Arkoma Bakken, LLC	203 E Interstate 30, Rockwall, TX 75087-5402	Sec. 14-T141N-R84W
Jean M. Voltz	9006 River Ridge Drive, Texarkana TX, 75503	Sec. 14-T141N-R84W
Rial Genre and Lynnette Genre	367 5th Street SW, Dickinson, ND 58601	Sec. 14-T141N-R84W
Margaret Leone Sutton Revocable Trust Agreement dated April 10, 1993	201 W Gibson Street, West Liberty, IA 52776	Sec. 14-T141N-R84W
Lynn C. Wright c/o Marjorie E. McKim	911 East Madison, Mt. Pleasant, IA 52641	Sec. 14-T141N-R84W
Pledge Resources, LLC	P. O. Box 1032, Bismarck, ND 58502	Sec. 14-T141N-R84W
Herbert Weder	Highland, IL 62249	Sec. 14-T141N-R84W
Jay W. Boulanger	9th and Lemon Streets, Highland, IL 62249	Sec. 14-T141N-R84W
Wray Boulanger	9th and Lemon Streets, Highland, IL 62249	Sec. 14-T141N-R84W
Orville A. Winet and Nelda E. Winet, as joint tenants	R. R. 3, Highland, IL 62249	Sec. 14-T141N-R84W
Susan Kim Ballinger, Successor Trustee of the Sutton Family Revocable Trust dated January 10, 1985/Jane Sutton	P. O. Box 1271, Catoosa, OK 74015	Sec. 14-T141N-R84W
Susan Kim Ballinger, Trustee of The Deborah Lynn Sutton Trust dated August 7, 2017	P. O. Box 1271, Catoosa, OK 74015	Sec. 14-T141N-R84W
Susan Kim Ballinger, Trustee of The David Keith Sutton Trust dated August 7, 2017	P. O. Box 1271, Catoosa, OK 74015	Sec. 14-T141N-R84W
Susan Kim Ballinger, Trustee of, The Ashley and Steven Ballinger Trust dated August 7, 2017	P. O. Box 1271, Catoosa, OK 74015	Sec. 14-T141N-R84W
Susan Kim Ballinger	P. O. Box 1271, Catoosa, OK 74015	Sec. 14-T141N-R84W
Steven Ballinger	P. O. Box 1271, Catoosa, OK 74015	Sec. 14-T141N-R84W
Missouri River Royalty Corporation	919 S 7th Street, Ste. 405, Bismarck, ND 58504	Sec. 14-T141N-R84W
Northern Pacific Royalties, LLC	P. O. Box 572, Bismarck, ND 58502	Sec. 14-T141N-R84W
Northern Energy Corporation	P. O. Box 2283, Bismarck, ND 58502	Sec. 14-T141N-R84W
Jane Ogilvie	23 Geneva Drive, Muscatine, IA 52761	Sec. 14-T141N-R84W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Mason W. Potter Estate, c/o Jane Ogilvie	23 Geneva Drive, Muscatine, IA 52761	Sec. 14-T141N-R84W
LARCO Resources, LLC	P. O. Box 821, Bismarck, ND 58502-0821	Sec. 14-T141N-R84W
Clark James Crawford	1930 Riverwood Drive, Bismarck, ND 58504	Sec. 14-T141N-R84W
Eliza A. Burkholder	111 Bellemont Road, Bloomington, IL 61701	Sec. 14-T141N-R84W
Chester C. Alexander and Ralph E. Alexander	1590 Martha Drive, Elgin, IL 60123	Sec. 14-T141N-R84W
Yank Litzelman	Olney, IL 62450	Sec. 14-T141N-R84W
Mabel Litzelman	Olney, IL 62450	Sec. 14-T141N-R84W
Bavendick Minerals & Royalty, LLC	P. O. Box 313, Bismarck, ND 58502-0313	Sec. 14-T141N-R84W
C. R. Hippard and Chas F. Hippard	108 Locust Street, Maroa, IL 61756	Sec. 14-T141N-R84W
Valerian L. Roberts	2921 Cronin Drive, Springfield, I, 62711	Sec. 14-T141N-R84W
Michael D. Glaspey and Joyce A. Glaspey	P. O. Box 77, Lignite, ND 58752	Sec. 14-T141N-R84W
Joe E. Harrison, Jr.	778 W Decatur Street, Decatur, I, 62522	Sec. 14-T141N-R84W
William C. Clements	Highland, IL 62249	Sec. 14-T141N-R84W
Sherry D. Wilkin and Paul W. Wilken	285 Falcon Drive E, Highland, IL, 62249	Sec. 14-T141N-R84W
Amelia R. Clements	No street address of record, Highland, IL 62249	Sec. 14-T141N-R84W
Shari R. Weber, Trustee of the Shari R. Weber Trust dated August 10, 2008	75-6100 Alii Drive, Kona Isle E 22, Kailua-Kona, HI 96740	Sec. 14-T141N-R84W
Betty Eileen Ferrel	3740 Pinebrook Circle, #107, Bradenton, FL 34209	Sec. 14-T141N-R84W
Rikki P. Doyle	3740 Pinebrook Circle, #207, Bradenton, FL 34209	Sec. 14-T141N-R84W
Marcy P. Stacy	5619 Open Gate Court, Cincinnati, OH 45247	Sec. 14-T141N-R84W
Bobby Gene Story	8749 N 600th Street, Newton, IL 62448	Sec. 14-T141N-R84W
Lee Eugene Story	7711 N 500th Street, Newton, IL 62448	Sec. 14-T141N-R84W
Paul D. Johnson, Trustee of the Declaration of Trust of Paul D. Johnson, dated April 5, 1996	105 N Lafayette, Newton, IL 62448	Sec. 14-T141N-R84W
Sandra K. Hartrich	13 Carriage Lane, Newton, IL 62448	Sec. 14-T141N-R84W
Lana Dhom	107 N Maple Street, Newton, IL 62448	Sec. 14-T141N-R84W
Bruce Hartrich	1209 Seasons Drive, Godfrey, IL 62035	Sec. 14-T141N-R84W
Eric Hartrich	1137 Drewsbury Court, Smyrna, GA 30080	Sec. 14-T141N-R84W
Judith Ann Hartrich and Dennis Hartrich	212 Cherry Lane, White House, TN 37188	Sec. 14-T141N-R84W
Julie Burns	212 Cherry Lane, White House, TN 37188	Sec. 14-T141N-R84W
Bradley Hartrich	212 Cherry Lane, White House, TN 37188	Sec. 14-T141N-R84W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Jill Han	212 Cherry Lane, White House, TN 37188	Sec. 14-T141N-R84W
Edward Kocher	16295 E 700th Avenue, Newton, IL 62448	Sec. 14-T141N-R84W
Scott A. Kocher	832 W 90th Avenue N, Conway Springs, KS 67031	Sec. 14-T141N-R84W
Matthew E. Kocher	4214 E State Hwy 234, Greenfield, IN 46140	Sec. 14-T141N-R84W
Gary Henry	257 Addison Way, Titusville, FL 32780	Sec. 14-T141N-R84W
Monica Snook	3406 Antietam Court, Edwardsville, IL 62025	Sec. 14-T141N-R84W
Melissa Cruz	13008 Pingry Place, Town & Country, MO 63131	Sec. 14-T141N-R84W
Melanie Byrkit	204 Magnolia Trace Drive, Ballwin, MO 63021	Sec. 14-T141N-R84W
Georgia Ann Upton	1783 Avenida Alta Mira, Oceanside, CA 92056	Sec. 14-T141N-R84W
John C. McElhiney	1720 Landisburg Road, Landisburg, PA 17040	Sec. 14-T141N-R84W
SHARK VENTURES, LLC	P. O. Box 2714, Bentonville, AR 72712	Sec. 14-T141N-R84W
Kent Littlejohn and Brenda Littlejohn	10777 N Friendship Road, Casey, IL 62420	Sec. 14-T141N-R84W
Jack L. Pitcher	6653 E 1800 Avenue, Montrose, IL 62445	Sec. 14-T141N-R84W
Melvin E. Pitcher	1065 Co. Rd. 000 N, Jewett IL 62436	Sec. 14-T141N-R84W
Marilyn J. James	24 Co. Rd. 1125 E, Jewett IL 62436	Sec. 14-T141N-R84W
Joyce Etnire	18931 Westfield Road, Charleston, IL, 61920	Sec. 14-T141N-R84W
Wayne Pitcher	11777 Destination Lane, Carthege, MO 64836	Sec. 14-T141N-R84W
Richard Pitcher	9000 U. S. Highway, Lot 575, Clermont, FL 34711	Sec. 14-T141N-R84W
Pam Goess	20 Lido Boulevard, Lake Grove, NY 11755	Sec. 14-T141N-R84W
Beverly Rosalee Shupe	206 N Marietta Street, Greenup, IL 62428	Sec. 14-T141N-R84W
Norma Elaine Edwards	262 Oak Avenue, Neoga, IL 62447	Sec. 14-T141N-R84W
Terry Eugene Warner	2537 Georgetown Road, Danville, IL 61832	Sec. 14-T141N-R84W
Stewart J. Schutte	6592 N 1075th Street, Robinson, IL 62454	Sec. 14-T141N-R84W
Tyler R. Tedford	10250 Wicklow Court, Fishers, IN 46040	Sec. 14-T141N-R84W
Kent A. Tedford	3823 N Ashland Avenue, #203, Chicago IL 60613	Sec. 14-T141N-R84W
David Porsborg and Karen Porsborg	2720 37th Avenue, New Salem, ND 58563	Sec. 24-T141N-R84W
Beverly Faul	1420 9th Avenue NE, McClusky, ND 58463	Sec. 24-T141N-R84W
Brad Bonnet	3444 110th Avenue NE, Bismarck, ND 58504	Sec. 24-T141N-R84W
Justin Kessler	6045 Lyndale Avenue S, #255, Minneapolis, MN 55419	Sec. 24-T141N-R84W
Adam Porsborg	2722 37th Avenue SW, New Salem, ND 58563	Sec. 24-T141N-R84W
Andrew Porsborg	2722 37th Avenue SW, New Salem, ND 58563	Sec. 24-T141N-R84W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Chad Porsborg	3206 Stonewall Drive, Bismarck, ND 58501	Sec. 24-T141N-R84W
Heather Bullinger	2602 10th Avenue SE, Mandan, ND 58554	Sec. 24-T141N-R84W
Christie Sorge	4412 E Mulberry, #312, Ft. Collins, CO 80524	Sec. 24-T141N-R84W
Tina Sorge	4412 E Mulberry, #312, Ft. Collins, CO 80524	Sec. 24-T141N-R84W
Jerald Reuther	405 E Denver Avenue, Bismarck, ND 58503	Sec. 24-T141N-R84W
Wayne Reuther	476 Glenwood Drive, Bismarck, ND 58504	Sec. 24-T141N-R84W
Keith Reuther	3594 27th Street SW, New Salem, ND 58563	Sec. 24-T141N-R84W
Karen Shulz	13720 Chamy Drive, Reno, NV 89521	Sec. 24-T141N-R84W
Kent Reuther and Pam Reuther	3610 27th Street SW, New Salem, ND 58563	Sec. 24-T141N-R84W
Dorothy Kessler	800 N Sewell Avenue, Miles City, MT 59301	Sec. 24-T141N-R84W
Dorothy Willem	1808 N Strevell, Miles City, MT 59301	Sec. 24-T141N-R84W
Jeannette Bonnet	1420 9th Avenue NW, McClusky, ND 58463	Sec. 24-T141N-R84W
Darlene Sorge	63 Lakeview Drive, Wheatland, WY 82201	Sec. 24-T141N-R84W
Robert Porsborg	415 1st Street E, Center, ND 58530	Sec. 24-T141N-R84W
Martha Reuther Estate, c/o Jerald Reuther	Martha Reuther Estate, c/o Jerald Reuther, 405 E Denver Avenue, Bismarck ND 58503 AND Martha Reuther Estate, c/o Jerald Reuther, New Salem ND 58563	Sec. 24-T141N-R84W
United States of America	No address of record	Sec. 10-T141N-R84W
Kenneth W. Reinke and Darlene Reinke	3841 25th Street SW, Center, ND 58530	Sec. 10-T141N-R84W
August W. Reinke Estate, c/o Kenneth W. Reinke	3841 25th Street SW, Center, ND 58530	Sec. 10-T141N-R84W
Lawrence Reinke, c/o Kenneth W. Reinke	3841 25th Street SW, Center, ND 58530	Sec. 10-T141N-R84W
Dora Reinke, c/o Kenneth W. Reinke	3841 25th Street SW, Center, ND 58530	Sec. 10-T141N-R84W
Walford Reinke, c/o Kenneth W. Reinke	3841 25th Street SW, Center, ND 58530	Sec. 10-T141N-R84W
Ervin Reinke, c/o Kenneth W. Reinke	3841 25th Street SW, Center, ND 58530	Sec. 10-T141N-R84W
Dora Schulte, c/o Kenneth W. Reinke	3841 25th Street SW, Center, ND 58530	Sec. 10-T141N-R84W
Grace Weiss, c/o Kenneth W. Reinke	3841 25th Street SW, Center, ND 58530	Sec. 10-T141N-R84W
B. W. Henderscheid and Alice Henderscheid	3635 Hwy 200A, Center, ND 58530	Sec. 3-T141N-R84W
Gloria R. Albers	852 Bermuda Drive, Hemet, CA, 92543	Sec. 3-T141N-R84W
Shannon Wade Henke	8921 Island Road, Bismarck, ND 58503	Sec. 3-T141N-R84W
Karla Rae Henke	1238 Hyacinth Lane, Peachtree City, GA 30269	Sec. 3-T141N-R84W
Verlaine Gullickson	701 33rd Avenue N, Unit 411, Fargo, ND 58102	Sec. 3-T141N-R84W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Agnes Dockter	2424 South 121st Street, Seattle, WA 98101	Sec. 15-T142N-R83W
Josephine McAdoo	No street address of record, Froid, MT 59226	Sec. 15-T142N-R83W
Anna Friesz	203 5th Avenue NE, Mandan, ND 58554	Sec. 15-T142N-R83W
Keith Vitek, as purported successor to the Estate of Clarence Vitek, deceased	P.O. Box 1214, Center, ND 58530	Sec. 15-T142N-R83W
Brenda Vitek, as purported successor to the Estate of Clarence Vitek, deceased	P.O. Box 1214, Center, ND 58530	Sec. 15-T142N-R83W
John Vitek	3002 South 208 Street, No. 8, Seattle WA, 98188	Sec. 15-T142N-R83W
Denisa Iwata f/k/a Denise Vitek	1458 Columbia Way 6, Seattle, WA 98178	Sec. 15-T142N-R83W
Sheila K. Naglich	11034 Crestwood Drive S, Seattle, WA 98178	Sec. 15-T142N-R83W
Gloria Iwata	1321 S. Puget Drive, E14, Renton, WA 98055	Sec. 15-T142N-R83W
Kathleen A. Rusich	4308 Lake Road, Apt. G, Killeen, WA 98146	Sec. 15-T142N-R83W
Sandra L. Vitek	10405 5th Avenue Southwest, Seattle, WA 98146	Sec. 15-T142N-R83W
Sacred Heart Hospice Donatory Corporation	1200 12th Street SW, Austin, MN 55912	Sec. 15-T142N-R83W
Karen O. Van Amburg, life tenant	2620 - 214th Avenue SE, Sammamish, WA 98075	Sec. 15-T142N-R83W
Jana Van Amburg, remainderman	2620 - 214th Avenue SE, Sammamish, WA 98075	Sec. 15-T142N-R83W
Matthew Van Amburg, remainderman	2620 - 214th Avenue SE, Sammamish, WA 98075	Sec. 15-T142N-R83W
Anne Cerulli, life tenant	13641 Alderwood Lane, 35B, Seal Beach, CA 90740	Sec. 15-T142N-R83W
Anthony James Cerulli, remainderman	2227 E. Everett Place, Orange, CA 92867	Sec. 15-T142N-R83W
Nathan Raymond Cerulli, remainderman	2227 E. Everett Place, Orange, CA 92867	Sec. 15-T142N-R83W
Black Stone Minerals Company, L.P.	1001 Fannin, Suite 2020, Houston, TX 77002	Sec. 15-T142N-R83W
Dorchester Minerals, L.P.	3838 Oak Lawn Avenue, Suite 300, Dallas, TX 75219	Sec. 15-T142N-R83W
Mike Saba a/k/a Michael P. Saba	26560 N. Shore Pl., Hartford, SD 57033	Sec. 15-T142N-R83W
State of North Dakota, for the use and benefit of the State Highway Department	608 East Boulevard Avenue, Bismarck, ND 58505-0700	Sec. 15-T142N-R83W
Larry Doll	3155 49th Avenue, New Salem, ND 58563	Sec. 23-T142N-R83W
Ann Doll	4601 McKenzie Drive SE, Mandan, ND 58554	Sec. 23-T142N-R83W
Larry Doll	3155 49th Avenue, New Salem, ND 58563	Sec. 23-T142N-R83W
Williston Projects, Inc.	3345 Highway 132, Rayville, LA 71269	Sec. 23-T142N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Nick Freidig	17220 Schuch Lane, Stanwood, WA 56201	Sec. 23-T142N-R83W
Leo Freidig	1106 W. 14th St., Willmar, MN no zip code of record56201	Sec. 23-T142N-R83W
Johanna Rambur Jackson	3420 11th Place N., Renton, WA 98056	Sec. 23-T142N-R83W
Murex Petroleum Corporation	515 N. Sam Houston Parkway East, Suite 485, Houston, TX 77060	Sec. 23-T142N-R83W
Alan G. Cypert	6467 Glennox St., Dallas, TX 75214	Sec. 23-T142N-R83W
Missiana L.L.C.	15311 Vantage Parkway West, Suite 201, Houston, TX 77032	Sec. 23-T142N-R83W
Matt Freidig Jr.	2202 E. Rosser, Bismarck, ND 58501	Sec. 23-T142N-R83W
Cynthia C. Fowler, as Trustee of The Cotton 4 Mineral Trust	1411 North Boulevard, Houston, TX 77006	Sec. 23-T142N-R83W
Michael H. Dunn	1128 South 7th Street, Bismarck, ND 58504	Sec. 23-T142N-R83W
James M. Dunn	116 Center Street, Bismarck, ND 58504	Sec. 23-T142N-R83W
Alice R. Dunn Thompson	116 Center Street, Bismarck, ND 58504	Sec. 23-T142N-R83W
Cynthia C. Fowler, as Trustee of The Cotton 6 Mineral Trust	1411 North Boulevard, Houston, TX 77006	Sec. 23-T142N-R83W
George E. Moss Jr. and John K. Moss, as joint tenants	4360 Worth Street, Los Angeles, CA 90063	Sec. 23-T142N-R83W
Alexander F. Rolle and Andrew Rolle, as Trustees of The Andrew Rolle O & G Trust	2105 Adair, San Marino, CA 91108	Sec. 23-T142N-R83W
Henry O. Bergloff	606 North Addison, Villa Park, IL 60181	Sec. 23-T142N-R83W
Raymond A. Bergloff	22712 Brenford Street, Woodland Hills, CA 91364	Sec. 23-T142N-R83W
Cleone I. Fredrickson	Box 9116, Brooks, OR 97305	Sec. 23-T142N-R83W
Laurence S. Bergloff	9900 Oakland Avenue South, Bloomington, MN 55420	Sec. 23-T142N-R83W
Beatrice L. Ottema	9901 Oakland Avenue South, Bloomington, MN 55420	Sec. 23-T142N-R83W
Alfred O. Bergloff	2528 Atlas Drive, Bismarck, ND 58501	Sec. 23-T142N-R83W
Mardi Albers, as purported successor to the Estate of Joyce Albers	P.O. Box 164, Grass Range, MT 59032	Sec. 23-T142N-R83W
Claudette Yantzer, as purported successor to the Estate of Joyce Albers	P.O. Box 180, Killdeer, ND 58640	Sec. 23-T142N-R83W
Daniel Bergloff	1232 W. 450 #46, Clearfield, UT 84015	Sec. 23-T142N-R83W
Norman Berglof	1232 W. 450 #46, Clearfield, UT 84015	Sec. 23-T142N-R83W
Vylo Raye Glasgow	2029 Canyon Drive, Billings, MT 59102	Sec. 23-T142N-R83W
Renee K. Hicks	16690 S.W. Vincent St., Aloha, OR 97007	Sec. 23-T142N-R83W
Constance M. Russell and Robert L. Russell, as Trustees of The Constance M. Russell Trust executed March 15, 1993	6000 NE Livingston Road, Camas, WA 98607	Sec. 23-T142N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Keith H. Albers	2333 Portola Drive #46, Santa Cruz, CA 95062	Sec. 23-T142N-R83W
Roberta L. Herman	20247 Homestead Drive, Oregon City, OR 97045	Sec. 23-T142N-R83W
State of North Dakota	1707 N 9th Street, Bismarck, ND 58501	Sec. 36-T142N-R84W
John M. Haag and Beata Haag	P. O. Box 353, Center ND 58530	Sec. 36-T142N-R84W
Larry J. Doll and Faye Doll	5801 Lake Shore Est., Lot 9, Beulah, ND 58523	Sec. 25-T142N-R83W
Monsadius J. Hatzenbihler Estate, c/o Denise Brorby and Jill Bosch	265 93rd Street SE, Strasburg, ND 58573	Sec. 25-T142N-R83W
Red Crown Royalties, LLC	1490 W Canal Court; Ste. 3000, Littleton, CO 80120	Sec. 25-T142N-R83W
Patrick T. Rooney, Timothy P. Rooney, James Harris Rooney, and L. F. Rooney, III, Co-Trustees of the L. F. Rooney III, Trust created by the Lucy T. Rooney 1992 GST Exempt Family Trusts under Trust Agreement dated August 18, 1992	7 Spring Creek Road, Muskogee, OK 74401	Sec. 25-T142N-R83W
Patrick T. Rooney, Timothy P. Rooney, James Harris Rooney, and L. F. Rooney, III, Co-Trustees of the Patrick T. Rooney Trust created by the Lucy T. Rooney 1992 GST Exempt Family Trusts under Trust Agreement dated August 18, 1992	7 Spring Creek Road, Muskogee, OK 74401	Sec. 25-T142N-R83W
Patrick T. Rooney, Timothy P. Rooney, James Harris Rooney, and L. F. Rooney, III, Co-Trustees of the Timothy P. Rooney Trust created by the Lucy T. Rooney 1992 GST Exempt Family Trusts under Trust Agreement dated August 18, 1992	7 Spring Creek Road, Muskogee, OK 74401	Sec. 25-T142N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Patrick T. Rooney, Timothy P. Rooney, James Harris Rooney, and L. F. Rooney, III, Co-Trustees of the James Harris Rooney Trust created by the Lucy T. Rooney 1992 GST Exempt Family Trusts under Trust Agreement dated August 18, 1992	7 Spring Creek Road, Muskogee, OK 74401	Sec. 25-T142N-R83W
Patrick T. Rooney, Timothy P. Rooney, James Harris Rooney, and L. F. Rooney, III, Co-Trustees of the Lucy Rooney Kapples Trust created by the Lucy T. Rooney 1992 GST Exempt Family Trusts under Trust Agreement dated August 18, 1992	7 Spring Creek Road, Muskogee, OK 74401	Sec. 25-T142N-R83W
Patrick T. Rooney, Timothy P. Rooney, James Harris Rooney, and L. F. Rooney, III, Co-Trustees of the Rebecca Finch Rooney Trust created by the Lucy T. Rooney 1992 GST Exempt Family Trusts under Trust Agreement dated August 18, 1992	7 Spring Creek Road, Muskogee, OK 74401	Sec. 25-T142N-R83W
Eileen Rooney Hewgley, L.L.C.	427 S Boston Avenue; Ste. 304, Tulsa, OK 74103	Sec. 25-T142N-R83W
RLand, L.L.C.	401 S Boston Avenue; Ste. 2400, Tulsa, OK 74103	Sec. 25-T142N-R83W
Osprey Resources, Inc.	P. O. Box 56449, Houston, TX 77256-6449	Sec. 25-T142N-R83W
Mary Michael Genung	885 Live Oak Ridge Road, Austin, TX 78746	Sec. 25-T142N-R83W
Gonzaga University Law Department	1224 E Euclid, Spokane, WA 99207	Sec. 25-T142N-R83W
Frase-Tucker Resources, LLC	P. O. Box 994486, Redding, CA 96099	Sec. 25-T142N-R83W
Tenneco Oil Company	P. O. Box 3119, Englewood, CO 80155 AND 1001 Louisiana, P. O. Box 2511, Houston, TX 77252-2511	Sec. 25-T142N-R83W
John M. Haag and Beata Haag	P. O. Box 353, Center, ND 58530	Sec. 24-T142N-R84W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Patrick T. Rooney, Timothy P. Rooney, James Harris Rooney, and L. F. Rooney, III, Co-Trustees of the L. F. Rooney III, Trust created by the Lucy T. Rooney 1992 GST Exempt Family Trusts under Trust Agreement dated August 18, 1992	7 Spring Creek Road, Muskogee, OK 74401	Sec. 24-T142N-R84W
Patrick T. Rooney, Timothy P. Rooney, James Harris Rooney, and L. F. Rooney, III, Co-Trustees of the Patrick T. Rooney Trust created by the Lucy T. Rooney 1992 GST Exempt Family Trusts under Trust Agreement dated August 18, 1992	7 Spring Creek Road, Muskogee, OK 74401	Sec. 24-T142N-R84W
Patrick T. Rooney, Timothy P. Rooney, James Harris Rooney, and L. F. Rooney, III, Co-Trustees of the Timothy P. Rooney Trust created by the Lucy T. Rooney 1992 GST Exempt Family Trusts under Trust Agreement dated August 18, 1992	7 Spring Creek Road, Muskogee, OK 74401	Sec. 24-T142N-R84W
Patrick T. Rooney, Timothy P. Rooney, James Harris Rooney, and L. F. Rooney, III, Co-Trustees of the James Harris Rooney Trust created by the Lucy T. Rooney 1992 GST Exempt Family Trusts under Trust Agreement dated August 18, 1992	7 Spring Creek Road, Muskogee, OK 74401	Sec. 24-T142N-R84W
Patrick T. Rooney, Timothy P. Rooney, James Harris Rooney, and L. F. Rooney, III, Co-Trustees of the Lucy Rooney Kapples Trust created by the Lucy T. Rooney 1992 GST Exempt Family Trusts under Trust Agreement dated August 18, 1992	7 Spring Creek Road, Muskogee, OK 74401	Sec. 24-T142N-R84W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Patrick T. Rooney, Timothy P. Rooney, James Harris Rooney, and L. F. Rooney, III, Co-Trustees of the Rebecca Finch Rooney Trust created by the Lucy T. Rooney 1992 GST Exempt Family Trusts under Trust Agreement dated August 18, 1992	7 Spring Creek Road, Muskogee, OK 74401	Sec. 24-T142N-R84W
Eileen Rooney Hewgley, L.L.C.	427 S Boston Avenue; Ste. 304, Tulsa, OK 74103	Sec. 24-T142N-R84W
RLand, L.L.C.	401 S Boston Avenue; Ste. 2400, Tulsa, OK 74103	Sec. 24-T142N-R84W
Osprey Resources, Inc.	P. O. Box 56449, Houston, TX 77256-6449	Sec. 24-T142N-R84W
Mary Michael Genung	885 Live Oak Ridge Road, Austin, TX 78746	Sec. 24-T142N-R84W
Gonzaga University Law Department	1224 E Euclid, Spokane, WA 99207	Sec. 24-T142N-R84W
Carlotta B. Tyler	Elk River MN 55330	Sec. 25-T142N-R84W
E. L. Gunberg	No street address, Minneapolis, MN 55111	Sec. 25-T142N-R84W
O. P. Curry	No street address, Minneapolis, MN 55111	Sec. 25-T142N-R84W
P. H. Phillips	5444 Fremont Ave S, Minneapolis, MN 55419-1625	Sec. 25-T142N-R84W
Albert A. Reed	No street address or zip code of record, Minneapolis, MN	Sec. 25-T142N-R84W
Frances R. Kary	1709 Linda Drive, Mandan, ND 58554	Sec. 25-T142N-R84W
Cecelia Hatzenbihler	P. O. Box 283, Center, ND 58530	Sec. 25-T142N-R84W
Elizabeth Hatzenbihler	P. O. Box 325, Center, ND 58530	Sec. 25-T142N-R84W
Joyce Barrick	835 Harrington Street SW, Hutchinson, MN 55350-3013	Sec. 25-T142N-R84W
Richard Himmelspach	8983 Sheridan Lake Road, Rapid City, SD 57702-9064	Sec. 25-T142N-R84W
Gary Himmelspach	4201 Old Red Trail NW, Mandan, ND 58554-1352	Sec. 25-T142N-R84W
Michele Curtis	710 3rd Avenue SE, Jamestown, ND 58401	Sec. 25-T142N-R84W
Robert Himmelspach	6298 Fox Run Drive, Idaho Falls, ID 83402-5876	Sec. 25-T142N-R84W
Mary Nelson	5004 Cornice Drive, Bismarck, ND 58503	Sec. 25-T142N-R84W
Becky Martin	10049 N 27th E, Idaho Falls, ID 83401-6437	Sec. 25-T142N-R84W
Beverly Moon	#4 Manor Lane, Rossville, GA 30741	Sec. 25-T142N-R84W
Jeanette Brown	HC 2, Box 154, Hensler, ND 58530	Sec. 25-T142N-R84W
Joseph Schmidt c/o Kenneth Schmidt	2205 36th Avenue SW, Center, ND 58530	Sec. 25-T142N-R84W
Kenneth J. Schmidt, Personal Representative of the Monica Schmidt Estate	2205 36th Avenue SW, Center, ND 58530	Sec. 25-T142N-R84W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Kenneth J. Schmidt, Trustee of the Monica Schmidt Trust U/W DTD 1/18/2002	2205 36th Avenue SW, Center, ND 58530	Sec. 25-T142N-R84W
Joseph Schmidt	3581 22 Street SW, Center, ND 58530	Sec. 19-T142N-R83W
Kenneth J. Schmidt, Trustee of the Monica Schmidt Trust U/W DTD 1/18/2002	2205 36th Avenue SW, Center, ND 58530	Sec. 19-T142N-R83W
Robert A. Wilbrandt, Executor of Harold M. Tripp Estate	P. O. Box 85, Crystal Lake, IL 60039	Sec. 19-T142N-R83W
Mary S. Tripp	P. O. Box 85, Crystal Lake, IL 60039	Sec. 19-T142N-R83W
Matthias A. Erhardt and Josephine Erhardt, as co-trustees of the Erhardt Family Trust dated June 13, 2006	2121 35th Avenue SW, Center, ND 58530	Sec. 19-T142N-R83W
June T. Nelson	15100 Interlachen Drive, # 212, Silver Springs, MD 20906	Sec. 19-T142N-R83W
Anna I. V. Kiebert	No address of record	Sec. 19-T142N-R83W
William V. Kiebert	No address of record	Sec. 19-T142N-R83W
Mary E. Tripp	No street address or zip of record. USPS.com for zip, Faribault, MN 55021	Sec. 19-T142N-R83W
Joey Nagel	RR1, Box 256, Center, ND 58530	Sec. 1-T141N-R83W
Jerry Nagel	RR1, Box 256, Center, ND 58530	Sec. 1-T141N-R83W
Richard A. Schwalbe and Lila M. Schwalbe, as joint tenants	HC 2, Box 254, Center, ND 58530	Sec. 1-T141N-R83W
Carl Schwalbe	HC 2 Box 258, Center ND 58530	Sec. 1-T141N-R83W
Rolland Schwalbe	HC 2 Box 258, Center ND 58530	Sec. 1-T141N-R83W
Loren Schwalbe	603 3rd Ave. NE, Mandan, ND 58554	Sec. 1-T141N-R83W
Albert Schwalbe	502 3rd Ave. NW, Mandan ND 58554	Sec. 1-T141N-R83W
State of North Dakota, N.D. Dept. of Trust Lands	1707 N 9th St, Bismarck, ND 58501-5523	Sec. 1-T141N-R83W
Richard A. Schwalbe and Lila M. Schwalbe, as joint tenants	HC 2, Box 254, Center, ND 58530	Sec. 12-T141N-R83W
Albert Schwalbe	502 3rd Ave. NW, Mandan, ND 58554	Sec. 12-T141N-R83W
Fred Schwalbe	Center ND 58530	Sec. 12-T141N-R83W
Raynold Schwalbe	Center ND 58530	Sec. 12-T141N-R83W
Walter Schwalbe	Center ND 58530	Sec. 12-T141N-R83W
Julie Hatzenbihler	P.O. Box 325, Center, ND 58530	Sec. 12-T141N-R83W
Rodney J. Hatzenbihler	2660 30th Avenue, Center, ND 58530	Sec. 12-T141N-R83W
Nancy Henke and Dwight Henke, as joint life tenants	P.O. Box 90, Hazen, ND 58545	Sec. 12-T141N-R83W
Melissa Hatlestad	2372 Harmon Lane N, Mandan, ND 58554	Sec. 12-T141N-R83W
Travis Henke	965 Gregory Lane, Mountain Home, ID 83647	Sec. 12-T141N-R83W
Bonnie Schwab	3203 Mink Avenue, Gillette, WY 82716	Sec. 12-T141N-R83W
Peggy Gobar	504 Garden Ave. NW, West Fargo, ND 58078	Sec. 12-T141N-R83W
Annette Hatzenbihler	310 W. Tonk, Gillette, WY 82718	Sec. 12-T141N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Brent Hatzenbihler	310 W. Tonk, Gillette, WY, 82718	Sec. 12-T141N-R83W
Randy Hatzenbihler	P.O. Box 325, Center, ND 58530	Sec. 12-T141N-R83W
State of North Dakota, N.D. Dept. of Trust Lands	1707 N 9th St, Bismarck, ND 58501-5523z	Sec. 12-T141N-R83W
United States of America	No address of record	Sec. 12-T141N-R83W
Reda Renee Clinton and Stephanie A. Clarys, as joint tenants	3135 27th St. SW, Center, ND 58530	Sec. 14-T141N-R83W
Michael P. Hilton	3135 27th St. SW, Center, ND 58530	Sec. 14-T141N-R83W
Oliver County	Oliver County Courthouse, 115 W Main, Center, ND 58530	Sec. 14-T141N-R83W
John Barnhardt	1511 North 21st Street, Bismarck, ND 58501	Sec. 14-T141N-R83W
Gail M. Hilton	3195 27th St., Center, ND 58530	Sec. 14-T141N-R83W
Delmar Hagerott	3170 27th Street, Center, ND, 58530	Sec. 14-T141N-R83W
Arline Orgaard	2935 Manitoba Lane, Bismarck, ND 58501	Sec. 14-T141N-R83W
Delvin Bueligen	709A 3rd Ave. SE, Mandan, ND 58554	Sec. 14-T141N-R83W
Lowell Bueligen	13621 Homestead Lane, Riverton, UT 84065	Sec. 14-T141N-R83W
Rodella Hausauer	1611 Castillian Way, Mundelein, IL 60060	Sec. 14-T141N-R83W
James Orgaard	9589 Brentford Drive, Highlands Ranch, CO 80126	Sec. 14-T141N-R83W
Clifford Orgaard	11839 Forada Beach Road SE, Unit A, Alexandria, MN 56308	Sec. 14-T141N-R83W
Steven Orgaard	2935 Manitoba Lane, Bismarck, ND 58501	Sec. 14-T141N-R83W
Michael Orgaard	3010 27th Street, Center, ND 58530	Sec. 14-T141N-R83W
Dale Barnhardt	3199 27th Street, Center, ND 58530	Sec. 14-T141N-R83W
Alan Schwalbe	3175 27th St., Center, ND 58530	Sec. 14-T141N-R83W
United States of America	No address of record	Sec. 14-T141N-R83W
Jeff Erhardt ad Mary Erhardt, as joint tenants	2161 34th Ave. SW, Center, ND 58530	Sec. 20-T142N-R83W
Yolanda Bittner	3428 Highway 25, Center, ND 58530	Sec. 20-T142N-R83W
"State of North Dakota N.D. Dept. of Trust Lands"	1707 N 9th St, Bismarck, ND 58501-5523	Sec. 20-T142N-R83W
Federal Land Bank of Saint Paul	375 Jackson Street, P.O. Box 64949, St. Pau, MN 55164-0949	Sec. 20-T142N-R83W
General Council of the Assemblies of God	1445 N. Boonville Avenue, Springfield MO 65802-1894	Sec. 20-T142N-R83W
North Dakota District Council of the Assemblies of God	1724 North Grandview Lane, Bismarck ND 58503	Sec. 20-T142N-R83W
Matthias A. Erhardt and Josephine Erhardt, as co-trustees of the Erhardt Family Trust dated June 13, 2006	2121 35th Ave. SW, Center, ND 58530	Sec. 20-T142N-R83W
United States of America	No address of record	Sec. 20-T142N-R83W
Carl Schwalbe	HC 2 Box 258, Center ND 58530	Sec. 26-T142N-R83W
Heirs or Devises of the Estate of Loren Schwalbe, deceased	3520 81st Ave. SE, Unit 15, Jamestown, ND 58401	Sec. 26-T142N-R83W
Rolland Schwalbe	HC 2 Box 258, Center ND 58530	Sec. 26-T142N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Marie Mosbrucker	127 Klein Avenue, Center, ND 58530	Sec. 26-T142N-R83W
Raymond Friedig	523 South Anderson Street, Bismarck, ND 58504	Sec. 26-T142N-R83W
Duane Friedig	1706 East Bowman Avenue, Bismarck, ND 58504	Sec. 26-T142N-R83W
Shirley Hilzendeger	110 Klein Avenue, Center, ND 58530	Sec. 26-T142N-R83W
Sacred Heart Hospice Donatory Corporation	1200 12th Street SW, Austin, MN 55912	Sec. 26-T142N-R83W
John J. Krauth	Dumont MN 56236	Sec. 26-T142N-R83W
Larry Doll	3155 49th Avenue, New Salem, ND 58563	Sec. 26-T142N-R83W
Ann Doll	4601 McKenzie Drive SE, Mandan, ND 58554	Sec. 26-T142N-R83W
T. F. Hodge	1113 Continental Bank Building, Fort Worth, TX No zip code of record	Sec. 26-T142N-R83W
Pierce Exploration & Production Corporation	1133 Bal Harbor Blvd., #1139, Punta Gorda, FL 33950	Sec. 26-T142N-R83W
Marshall & Winston, Inc.	P.O. Box 50880, Midland, TX 79710-0880	Sec. 26-T142N-R83W
State of North Dakota, N.D. Dept. of Trust Lands	1707 N 9th St, Bismarck, ND 58501-5523	Sec. 26-T142N-R83W
Dale Barth	2255 33rd Ave. SW, Center, ND 58530	Sec. 27-T142N-R83W
Kathryn S. Wilson	1941 St. Johns Road, Apt. #34, Seal Beach, CA 90740	Sec. 27-T142N-R83W
Margaret A. Flavin	1240 Fourth Avenue, Los Angeles, CA 90019	Sec. 27-T142N-R83W
Bradley Ferderer, as trustee of the Thomas A. Ferderer Residuary Trust	Heil, ND 58546	Sec. 28-T142N-R83W
Nick Ferderer	Flasher, ND 58535 AND 912 Summit Blvd, Bismarck ND 58504-5277	Sec. 28-T142N-R83W
Harry H. Ferderer	907 Cowl Street, Milton Freewater, OR 97862-1682	Sec. 28-T142N-R83W
John R. Ferderer	115 C Street North Richardton ND 58652	Sec. 28-T142N-R83W
Eleanor Falstad	2495 15th St. NW Coleharbor, ND 58531-9449	Sec. 28-T142N-R83W
Joyce Ervin, as personal representative of the Estate of Marie M. McGirl, deceased	2073 Rayshire Street, Thousand Oaks CA 91362-2460	Sec. 28-T142N-R83W
Esther Ferderer, as personal representative of the Estate of Jake H. Ferderer, deceased	No address of record	Sec. 28-T142N-R83W
Dorene Rambur	500 North 17th Street Bismarck ND 58501	Sec. 28-T142N-R83W
Norman D. Bunch	6900 Wedgewood Ct., Black Hawk, SD 57718-9680	Sec. 28-T142N-R83W
Kasper Barth	Center ND 58530	

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Dale Barth	2255 33rd Ave SW, Center, ND 58530	Sec. 28-T142N-R83W
Dusty Backer	PO Box 411, Underwood, ND 58576	Sec. 28-T142N-R83W
United States of America	No address of record	Sec. 28-T142N-R83W
Minnkota Power Cooperative, Inc.	5301 32nd Avenue S., Grand Forks, ND 58208-3200 AND 1822 Mill Road, P. O. Box 13200, Grand Forks, ND 58208-3200	Sec. 29-T142N-R83W
Darlene Voegelé	P. O. Box 45, Stanton, ND 58571	Sec. 29-T142N-R83W
Charles Kuether	3555 28th St., New Salem, ND 58563	Sec. 29-T142N-R83W
Doris Kuether	3555 28th St., New Salem, ND 58563	Sec. 29-T142N-R83W
Wayne Windhorst	P. O. Box 45, Stanton, ND 58571	Sec. 29-T142N-R83W
Spindletop Exploration Company, Inc.	P. O. Box 50787, Midland, TX 79710-0787	Sec. 29-T142N-R83W
Estate of Elizabeth Meader, deceased	116 Dix Ave., Kingsbury, NY 12809	Sec. 29-T142N-R83W
Estate of Mildred Doyle, deceased	6 Tower Street, Red Hook, NY 12571	Sec. 29-T142N-R83W
Shirley A. Kilgour	6 Tower Street, Red Hook, NY 12571	Sec. 29-T142N-R83W
Denis A. Doyle	9 Spencer Drive, Red Hook, NY 12571	Sec. 29-T142N-R83W
J. F. Millard	5100 Aldrich Avenue South, Minneapolis, MN 55419	Sec. 29-T142N-R83W
Benischek Management, L.L.C.	3600 N. Harvey Parkway, Oklahoma City, OK 73118	Sec. 29-T142N-R83W
H. Gordon Eason	203 Chestnut, Battle Creek, MI 49017	Sec. 29-T142N-R83W
Margaret W. Eason	203 Chestnut, Battle Creek, MI 49017	Sec. 29-T142N-R83W
John H. Carton	Wolverine Tower, Battle Creek, MI	Sec. 29-T142N-R83W
Mack K. Lowrey	P. O. Box 393, Lancaster, TX 75146	Sec. 29-T142N-R83W
Red Crown Royalties, LLC	1490 W Canal Court, Suite 3000, Littleton, CO 80120	Sec. 29-T142N-R83W
Frase-Tucker Resources, LLC	P.O. Box 994486, Redding, CA 96099	Sec. 29-T142N-R83W
Minnkota Power Cooperative, Inc.	5301 32nd Avenue S, Grand Forks, ND 58201-3312 AND 1822 Mill Road, P. O. Box 13200, Grand Forks, ND 58208-3200	Sec. 30-T142N-R83W
Darlene Voegelé	P. O. Box 45, Stanton, ND 58571	Sec. 30-T142N-R83W
John M. Haag and Beata Haag, as joint tenants	P. O. Box 353, Center ND 58530	Sec. 30-T142N-R83W
Osprey Resources, Inc.	PO Box 56449, Houston, TX 77256-6449	Sec. 30-T142N-R83W
Mary Michael Genung	885 Live Oak Ridge Road, West Lake Hills, TX 78746	Sec. 30-T142N-R83W
Patrick T. Rooney, Timothy P. Rooney, James Harris Rooney, and L. F. Rooney III, as co-trustees of the L. F. Rooney III Trust	7 Spring Creek Road, Muskogee OK 74401	Sec. 30-T142N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Patrick T. Rooney, Timothy P. Rooney, James Harris Rooney, and L. F. Rooney III, as co-trustees of the Patrick T. Rooney Trust	7 Spring Creek Road, Muskogee OK 74401	Sec. 30-T142N-R83W
Patrick T. Rooney, Timothy P. Rooney, James Harris Rooney, and L. F. Rooney III, as co-trustees of the Timothy P. Rooney Trust	7 Spring Creek Road, Muskogee OK 74401	Sec. 30-T142N-R83W
Patrick T. Rooney, Timothy P. Rooney, James Harris Rooney, and L. F. Rooney III, as co-trustees of the James Harris Rooney Trust	7 Spring Creek Road, Muskogee OK 74401	Sec. 30-T142N-R83W
Patrick T. Rooney, Timothy P. Rooney, James Harris Rooney, and L. F. Rooney III, as co-trustees of the Lucy Rooney Kapples Trust	7 Spring Creek Road, Muskogee OK 74401	Sec. 30-T142N-R83W
Patrick T. Rooney, Timothy P. Rooney, James Harris Rooney, and L. F. Rooney III, as co-trustees of the Rebecca Finch Rooney Trust	7 Spring Creek Road, Muskogee OK 74401	Sec. 30-T142N-R83W
Eileen Rooney Hewgley, L.L.C.	427 South Boston Avenue, Suite 304, Tulsa, OK 74103	Sec. 30-T142N-R83W
RLand, L.L.C.	401 South Boston Avenue, Suite 2400, Tulsa, OK 74103	Sec. 30-T142N-R83W
Gonzaga University Law Dept.	1224 E Euclid, Spokane, WA 99207	Sec. 30-T142N-R83W
Charles Kuether	3555 28th St., New Salem, ND 58563	Sec. 30-T142N-R83W
Doris Kuether	3555 28th St., New Salem, ND 58563	Sec. 30-T142N-R83W
Benischek Management, L.L.C.	3600 N. Harvey Parkway, Oklahoma City, OK 73118	Sec. 30-T142N-R83W
H. Gordon Eason	203 Chestnut, Battle Creek, MI 49017	Sec. 30-T142N-R83W
Margaret W. Eason	203 Chestnut, Battle Creek, MI 49017	Sec. 30-T142N-R83W
John H. Carton	Wolverine Tower, Battle Creek, MI 49017	Sec. 30-T142N-R83W
Mack K. Lowrey	P. O. Box 393, Lancaster, TX 75146	Sec. 30-T142N-R83W
Red Crown Royalties, LLC	1490 W Canal Court, Suite 3000, Littleton, CO 80120	Sec. 30-T142N-R83W
Frase-Tucker Resources, LLC	P.O. Box 994486, Redding, CA 96099	Sec. 30-T142N-R83W
Spindletop Exploration Company, Inc.	P. O. Box 50787, Midland, TX 79710-0787	Sec. 30-T142N-R83W
Estate of Elizabeth Meader, deceased	116 Dix Ave., Kingsbury, NY No zip code of record	Sec. 30-T142N-R83W
Estate of Mildred Doyle, deceased	6 Tower Street, Red Hook, NY 12571	Sec. 30-T142N-R83W
Shirley A. Kilgour	6 Tower Street, Red Hook, NY 12571	Sec. 30-T142N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Denis A. Doyle	9 Spencer Drive, Red Hook, NY 12571	Sec. 30-T142N-R83W
Unknown trustee of the Frederick W. McCoy, Jr. Revocable Trust	PO Box 11215, St. Louis, MO 63105	Sec. 30-T142N-R83W
Hymen Cohen and Janis M. Cohen, as joint tenants	7301 Shaftesbury, University City, MO 63130	Sec. 30-T142N-R83W
Martha Buchheister	1748 Fremont Court, Ft. Collins, CO 80526	Sec. 30-T142N-R83W
DGHJLW Holdings, LLC	P.O. Box 33, Cleveland, NM 87715-0033	Sec. 30-T142N-R83W
Groundswell 45, LLC	P.O. Box 121, Kiowa, CO 80117	Sec. 30-T142N-R83W
AWerdel Minerals, LLC	1419 17th Street, Greeley, CO 80631	Sec. 30-T142N-R83W
J. Byron Werdel Resources, LLC	1419 17th Street, Greeley, CO 80631	Sec. 30-T142N-R83W
Shari R. Weber, as trustee of the Shari R. Weber Trust dated August 10, 2008	107 W. Cedar, P O Box 137, Robinson, IL 62454	Sec. 30-T142N-R83W
Betty Eileen Ferrel	3740 Pinebrook Circle, #107, Bradenton, FL 34209	Sec. 30-T142N-R83W
Rikkie P. Doyle	3740 Pinebrook Circle, #207, Bradenton, FL 34209	Sec. 30-T142N-R83W
Marcy P. Stacy	5619 Open Gate Court, Cincinnati, OH 45247	Sec. 30-T142N-R83W
Guy M. Simmons and Ruby P. Simmons, as joint tenants	820 North Cross St., Robinson, IL 62454	Sec. 30-T142N-R83W
Thomas E. Eaton, Sr.	7817 North 1150th Street, Newton, IL 62448	Sec. 30-T142N-R83W
Jacqueline R. Blakley	3207 Florence Drive, Champaign, IL, 61822-8011	Sec. 30-T142N-R83W
Lee. R. Martin	1602 South Lamar Street, Lakewood, CO 80226	Sec. 30-T142N-R83W
Kent Littlejohn and Brenda Littlejohn, as joint tenants	10777 N. Friendship Road, Casey, IL 62420	Sec. 30-T142N-R83W
O. E. Benefiel and Isabel Benefiel, as joint tenants	No street address of record, Newton, IL 62448	Sec. 30-T142N-R83W
Jerome Maginn and Mary Maginn, as joint tenants	Route #3, Newton, IL 62448	Sec. 30-T142N-R83W
Timothy J. Pulliam, as Trustee of the Timothy J. Pulliam Family Legacy Trust dated December 14, 2017	27701 Sycamore Creek Drive, Valencia, CA 91354	Sec. 30-T142N-R83W
Alonzo Walden and Buerryl Walden, as joint tenants	No street address of record, Hidalgo, IL No zip code of record	Sec. 30-T142N-R83W
Donald L. Long and Ledora M. Long, as joint tenants	R. R. 3, Newton, IL 62448	Sec. 30-T142N-R83W
Arnold L. Colpitts and Esther M. Colpitts, as joint tenants	No street address of record, Newton, IL No zip code of record	Sec. 30-T142N-R83W
Irma J. Goeckner, as Trustee of the Goeckner Living Trust dated January 24, 2011	7202 Torrington Way, Springfield, IL 62711	Sec. 30-T142N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Alice Marlene Heaton	863 County Road 500 East, Toledo, IL 62468	Sec. 30-T142N-R83W
Todd David Clark	3301 Avondale Avenue, Knoxville, TN 37917	Sec. 30-T142N-R83W
David Deatherage and Myrtle Deatherage, as joint tenants	No street address of record, Oblong, IL 62449	Sec. 30-T142N-R83W
Estate of Belva L. Dalrymple, deceased	8929 State Route 555, Cutler OH 45724-5167	Sec. 30-T142N-R83W
Robert Lynn Dalrymple and Elizabeth J. Feuerstein, as joint tenants	5 West Fairview Street, Arlington Heights, IL 60005-2551	Sec. 30-T142N-R83W
Barbara Breen, as PR of the Estate of William Wallace Dalrymple, deceased	4 Stuart on Oxford, Rolling Meadows, IL 60008	Sec. 30-T142N-R83W
Kay Kirkpatrick	430 S. Elmwood, Oak Park, IL 60302	Sec. 30-T142N-R83W
Karen Quinn	518 S. Euclid, Oak Park, IL 60304	Sec. 30-T142N-R83W
Kathy Simandl	R.R. #2, Box 210, Menomonie, WI 54751	Sec. 30-T142N-R83W
George G. Vaught, Jr.	P.O. Box 13557, Denver, CO 80201-3557	Sec. 30-T142N-R83W
Paul L. McCulliss	P.O. Box 3248, Littleton, CO 80161-3248	Sec. 30-T142N-R83W
Glengarry Oil Company	PO Box 267, Lima, OH 45802	Sec. 30-T142N-R83W
Stewart J. Schutte	6592 N. 1075th Street, Robinson, IL 62454	Sec. 30-T142N-R83W
Tyler R. Tedford	10250 Wicklow Court, Fishers, IN 46040	Sec. 30-T142N-R83W
Kent A. Tedford	3823 N. Ashland Avenue, #203, Chicago, IL 60613	Sec. 30-T142N-R83W
Charles Sanders	301 North Wolfenberger Street, #1, Sullivan IN 47882-7211	Sec. 30-T142N-R83W
Thomas L. Frichtl and Elizabeth Frichtl, as joint tenants	11681 North 1300th Street, Newton IL 62448-3622	Sec. 30-T142N-R83W
Frank G. Mefford, Emogene Mefford, and Cheryl A. Mefford, as joint tenants	Rt. 1, Palestine, IL 62451	Sec. 30-T142N-R83W
James D. Stout, as trustee of the Carl H. Zwermann Trust	PO Box 714, Robinson IL 62454	Sec. 30-T142N-R83W
United States of America	No address of record	Sec. 30-T142N-R83W
Carl Schwalbe	HC 2 Box 258, Center ND 58530	Sec. 35-T142N-R83W
Loren Schwalbe	603 3rd Ave. NE, Mandan ND 58554	Sec. 35-T142N-R83W
Rolland Schwalbe	HC 2 Box 258, Center ND 58530	Sec. 35-T142N-R83W
T. F. Hodge	1113 Continental Bank Building, Fort Worth, TX No zip code of record	Sec. 35-T142N-R83W
Pierce Exploration & Production Corporation	1133 Bal Harbor Blvd., #1139, Punta Gorda, FL 33950	Sec. 35-T142N-R83W
Marshall & Winston, Inc.	P.O. Box 50880 Midland, TX 79710-0880	Sec. 35-T142N-R83W
State of North Dakota, N.D. Dept. of Trust Lands	1707 N 9th St, Bismarck, ND 58501-5523	Sec. 36-T142N-R83W
Michelle Marie Ternes	3721 W Regent Drive, Bismarck, ND 58504	Sec. 35-T142NR84W
Michael P. Dresser	3731 24th Street SW, Center, ND 58530	Sec. 35-T142NR84W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Linda L. Ash	411B 32nd Avenue NW, Underwood, ND 58576	Sec. 35-T142NR84W
Thomas Dresser, Sr.	HC 2, Box 218", Center, ND 58530	Sec. 35-T142NR84W
USA - Dept. of Interior, Bureau of Land Management	1245 N 29th Street, Billings, MT 59101-0122	Sec. 34-T142N-R84W
Larry Bernard Dresser and Mary Dresser	RR 1, Box 80A", Washburn, ND 58577	Sec. 34-T142N-R84W
Thomas Dresser, Jr.	609 N Almon, #2028, Moscow, ID 83843	Sec. 34-T142N-R84W
Tammy L. Dresser	4810 16th Avenue SW, Apt. #206, Fargo, ND 58103	Sec. 34-T142N-R84W
Laura Ann Dresser	4810 Highway 7, Apt. #102, St. Louis Park, MN 55416	Sec. 34-T142N-R84W
Paul Ash	HC 1, Box 34", Underwood, ND 58576	Sec. 34-T142N-R84W
Dean Ash	HC 1, Box 34", Underwood, ND 58576	Sec. 34-T142N-R84W
Theresa Ash	HC 1, Box 34, Underwood, ND 58576	Sec. 34-T142N-R84W
Dale Barth	2255 33rd Ave. SW, Center, ND 58530	Sec. 16-T142NR83W
State of North Dakota		Sec. 16-T142NR83W
Luella C. Isaak	3347 Hwy 25, Center, ND 58530	Sec. 16-T142NR83W
Burton Isaak	3345 Hwy 25, Center, ND 58530	Sec. 16-T142NR83W
Bruce Isaak	1819 Xavier Street, Bismarck, ND 58501	Sec. 16-T142NR83W
Byron Isaak	2132 Terra Ridge Drive, Highlands Ranch, CO 80126	Sec. 16-T142NR83W
Brenda Kitzan	3313 Hwy 25, Center, ND 58530	Sec. 16-T142NR83W
Yolanda Bittner	3428 Highway 25, Center, ND 58530	Sec. 17-T142N-R83W
The State of North Dakota	1707 N 9th Street, Bismarck, ND 58501	Sec. 17-T142N-R83W
United States of America	No address of record	Sec. 12-T141N-R84W
Jolene Berger	3004 Manchester Street, Bismarck, ND 58504	Sec. 12-T141N-R84W
Brian Dresser	2574 37th Avenue SW, Center, ND 58530	Sec. 12-T141N-R84W
Frances Fuchs	2475 37th Avenue NW, Center, ND 58530	Sec. 12-T141N-R84W
Rosalie A. Dingus	400 Augsburg Avenue, Bismarck, ND 58504	Sec. 12-T141N-R84W
Mark R. Fuchs	18671 Fairweather, Canyon Country, CA 91351	Sec. 12-T141N-R84W
Jack B. Fuchs	15409 Rhododendron Drive, Canyon Country, CA 91351	Sec. 12-T141N-R84W
Yvonne Schmidt	3611 42nd Street NW, Mandan, ND 58554	Sec. 12-T141N-R84W
Terrence Schmidt	515 Nottingham Drive, Bismarck, ND 58504	Sec. 12-T141N-R84W
Randall Schmidt	4817 Roughrider Circle, Mandan, ND 58554	Sec. 12-T141N-R84W
Raymond Schmidt, Jr.	5735 Highland Road, Mandan, ND 58554	Sec. 12-T141N-R84W
Marsha Strecker	P. O. Box 105, South Heart, ND 58655 AND 203 S Prairie Lane, Mandan, ND 58554	Sec. 12-T141N-R84W
JoAnne Snow	329 Bedford Boulevard, Bismarck, ND 58504 AND 902 S Woodland Drive, Mandan, ND 58554	Sec. 12-T141N-R84W
Jeffrey Schmidt	3611 42nd Street NW, Mandan, ND 58554	Sec. 12-T141N-R84W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Patrick T. Rooney, Timothy P. Rooney, James Harris Rooney, and L. F. Rooney, III, Co-Trustees of the L. F. Rooney III, Trust created by the Lucy T. Rooney 1992 GST Exempt Family Trusts under Trust Agreement dated August 18, 1992	7 Spring Creek Road, Muskogee, OK 74401	Sec. 12-T141N-R84W
Patrick T. Rooney, Timothy P. Rooney, James Harris Rooney, and L. F. Rooney, III, Co-Trustees of the Patrick T. Rooney Trust created by the Lucy T. Rooney 1992 GST Exempt Family Trusts under Trust Agreement dated August 18, 1992	7 Spring Creek Road, Muskogee, OK 74401	Sec. 12-T141N-R84W
Patrick T. Rooney, Timothy P. Rooney, James Harris Rooney, and L. F. Rooney, III, Co-Trustees of the Timothy P. Rooney Trust created by the Lucy T. Rooney 1992 GST Exempt Family Trusts under Trust Agreement dated August 18, 1992	7 Spring Creek Road, Muskogee, OK 74401	Sec. 12-T141N-R84W
Patrick T. Rooney, Timothy P. Rooney, James Harris Rooney, and L. F. Rooney, III, Co-Trustees of the James Harris Rooney Trust created by the Lucy T. Rooney 1992 GST Exempt Family Trusts under Trust Agreement dated August 18, 1992	7 Spring Creek Road, Muskogee, OK 74401	Sec. 12-T141N-R84W
Patrick T. Rooney, Timothy P. Rooney, James Harris Rooney, and L. F. Rooney, III, Co-Trustees of the Lucy Rooney Kapples Trust created by the Lucy T. Rooney 1992 GST Exempt Family Trusts under Trust Agreement dated August 18, 1992	7 Spring Creek Road, Muskogee, OK 74401	Sec. 12-T141N-R84W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Patrick T. Rooney, Timothy P. Rooney, James Harris Rooney, and L. F. Rooney, III, Co-Trustees of the Rebecca Finch Rooney Trust created by the Lucy T. Rooney 1992 GST Exempt Family Trusts under Trust Agreement dated August 18, 1992	7 Spring Creek Road, Muskogee, OK 74401	Sec. 12-T141N-R84W
Eileen Rooney Hewgley, L.L.C.	401 S Boston Avenue; Ste. 2400, Tulsa, OK 74103	Sec. 12-T141N-R84W
RLand, L.L.C.	P. O. Box 56449, Houston, TX 77256-6449	Sec. 12-T141N-R84W
Osprey Resources, Inc.	885 Live Oak Ridge Road, Austin, TX 78746	Sec. 12-T141N-R84W
Mary Michael Genung	885 Live Oak Ridge Road, Austin, TX 78746	Sec. 12-T141N-R84W
Gonzaga University Law Department	1224 E Euclid, Spokane, WA 99207	Sec. 12-T141N-R84W
J. C. Miller	508 Beacon Building, Tulsa, OK 74103	Sec. 12-T141N-R84W
Ralph M. Fahrenwald and Edna M. Fahrenwald	3737 E 45th Street, Tulsa, OK 74135	Sec. 12-T141N-R84W
Noah W. Millsap and Nell Rose Millsap	1927 E 33rd Place, Tulsa, OK 74105	Sec. 12-T141N-R84W
W. A. Dean and Fonda G. Dean	1316 E 35th Place, Tulsa, OK 74105	Sec. 12-T141N-R84W
Regina Husfloen	240 Bridge Avenue, Center, ND 58530	Sec. 12-T141N-R84W
Judith McNulty	P. O. Box 1173, Center, ND 58530	Sec. 12-T141N-R84W
Gary Hagel	3453 Thunderbird Lane, Bismarck, ND 58503	Sec. 12-T141N-R84W
Scott Hagel	275 Poplar Drive , Shoreview, MN 55126	Sec. 12-T141N-R84W
Dennis Hagel	506 W Main, Hazen, ND 58545	Sec. 12-T141N-R84W
Jay Kautzman	2024 N 5th Street, Bismarck, ND 58501	Sec. 12-T141N-R84W
Julie Fry	1853 N 23rd Street, Bismarck, ND 58501	Sec. 12-T141N-R84W
Janet Anderson	15537 E Radcliffe Place, Aurora, CO 80015	Sec. 12-T141N-R84W
Jeanine Marcolina	3938 E San Pedro, Gilbert, AZ 85234	Sec. 12-T141N-R84W
John Kautzman	P. O. Box 82, Center, ND 58530	Sec. 12-T141N-R84W
Jeff Erhardt and Mary Erhardt, as joint tenants	2161 34th Ave. SW, Center, ND 58530	Sec. 21-T142N-R83W
Keith Erhardt	P.O. Box 1846, Center, ND 58530	Sec. 21-T142N-R83W
Keith Erhardt and Kelly Jo Erhardt, as joint tenants	P.O. Box 1846, Center, ND 58530	Sec. 21-T142N-R83W
Melvin Schoepp and Caroline Schoepp, as joint tenants	2023 Northridge Drive, Bismarck, ND 58503	Sec. 21-T142N-R83W
State of North Dakota	1707 N 9th St, Bismarck, ND 58501-5523	Sec. 21-T142N-R83W
AgriBank, FCB	375 Jackson Street, P.O. Box 64949, St. Paul, MN 55164-0949	Sec. 21-T142N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Sacred Heart Hospice Donatory Corporation (as apparent successor to Robert Dunn)	1200 12th Street SW, Austin, MN 55912	Sec. 21-T142N-R83W
Richard E. Armentrout and Margaret Ann Armentrout, as joint tenants	255 Lynn Ave., Satellite Beach, FL 32937	Sec. 21-T142N-R83W
Burtis B. Conyne	No street address of record, Bismarck ND, No zip code of record	Sec. 21-T142N-R83W
Mary Dunn Lynch	No street address of record Austin, MN 55912	Sec. 21-T142N-R83W
Margaret E. Hagerott	No street address of record, Mandan ND 58554	Sec. 21-T142N-R83W
Michael H. Dunn	1128 South 7th Street, Bismarck, ND 58504	Sec. 21-T142N-R83W
James M. Dunn	116 Center Street, Bismarck, ND 58504	Sec. 21-T142N-R83W
Alice R. Dunn Thompson	116 Center Street, Bismarck, ND 58504	Sec. 21-T142N-R83W
Red Crown Royalties, LLC	1490 W Canal Court, Suite 3000, Littleton, CO 80120	Sec. 21-T142N-R83W
Frase-Tucker Resources, LLC	P.O. Box 994486, Redding, CA 96099	Sec. 21-T142N-R83W
United States of America	No address of record	Sec. 11-T141N-R84W
State of North Dakota, Department of Trust Lands	1707 N 9th Street, Bismarck, ND 58501-5523	Sec. 11-T141N-R84W
Lee Dresser	P. O. Box 683, Riverdale, ND 58565	Sec. 11-T141N-R84W
David O. Berger and Debra A. Berger, as joint tenants	2531 37th Avenue SW, Center, ND 58530	Sec. 11-T141N-R84W
Great Northern Properties LP	1101 N 27th Street; Suite 201, Billings, MT 59101 AND 1658 Cole Boulevard, Building #6, Suite 2, Golden, CO 80401	Sec. 11-T141N-R84W
Meridian Land & Mineral Company	5613 DTC Parkway; Suite 1100, Englewood, CO 80111 AND 2919 Allen Parkway, Houston, TX 77019-2142	Sec. 11-T141N-R84W
Yvonne Schmidt	3611 42nd Street NW, Mandan, ND 58554	Sec. 11-T141N-R84W
Terrence Schmidt	515 Nottingham Drive, Bismarck, ND 58504	Sec. 11-T141N-R84W
Randall Schmidt	4817 Roughrider Circle, Mandan, ND 58554	Sec. 11-T141N-R84W
Raymond Schmidt, Jr.	5735 Highland Road, Mandan, ND 58554	Sec. 11-T141N-R84W
Marsha Strecker	P. O. Box 105, South Heart, ND 58655 AND 203 S Prairie Lane, Mandan, ND 58554	Sec. 11-T141N-R84W
JoAnne Snow	329 Bedford Boulevard, Bismarck, ND 58504 AND 902 S Woodland Drive, Mandan, ND 58554	Sec. 11-T141N-R84W
Jeffrey Schmidt	3611 42nd Street NW, Mandan, ND 58554	Sec. 11-T141N-R84W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Matt Berger and Rose Berger c/o David O. Berger"	2531 37th Avenue SW, Center, ND 58530	Sec. 11-T141N-R84W
Margaret Schmidt	1305 2nd Street NW, Mandan, ND 58554	Sec. 11-T141N-R84W
Raymond Schmidt Estate c/o Margaret Schmidt	1305 2nd Street NW, Mandan, ND 58554	Sec. 11-T141N-R84W
Melvin Schoepp	3020 Daytona Drive, Bismarck, ND 58503	Sec. 22-T142N-R83W
Caroline K. Schoepp	3020 Daytona Drive, Bismarck, ND 58503	Sec. 22-T142N-R83W
Larry Doll	3155 49th Ave., New Salem, ND 58563	Sec. 22-T142N-R83W
Grealing Starck and Deborah Stark, as joint tenants	3244 Highway 25, Center, ND 58530	Sec. 22-T142N-R83W
Marie Mosbrucker	127 Klein Avenue, Center, ND 58530	Sec. 22-T142N-R83W
Raymond Friedig	523 South Anderson Street, Bismarck, ND 58504	Sec. 22-T142N-R83W
Duane Friedig	1706 East Bowman Avenue, Bismarck, ND 58504	Sec. 22-T142N-R83W
Shirley Hilzendeger	110 Klein Avenue, Center, ND 58530	Sec. 22-T142N-R83W
Ann Doll	4601 McKenzie Drive SE, Mandan, ND 58554	Sec. 22-T142N-R83W
Richard C. Boulder, as Personal Representative of the Estate of Winifred M. Dunn, deceased	No street address of record, Austin, MN 55912	Sec. 22-T142N-R83W
Ryan Oil Company, LLC	P.O. Box 507, Evansville, IN 47703	Sec. 22-T142N-R83W
Derby Energy, L.L.C.	6420 Richmond Avenue, Suite 210, Houston, TX 77057	Sec. 22-T142N-R83W
State of North Dakota	1707 N 9th St, Bismarck, ND 58501-5523	Sec. 22-T142N-R83W
United States of America	No address of record	Sec. 22-T142N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
BNI Coal Ltd.	1637 Burnt Boat Drive, Bismarck, ND 58502-0897 AND P. O. Box 897, Bismarck, ND 58502 AND 16400 Saybrook Lane, Huntington, CA 92649	Sec. 3-T141N-R83W Sec. 5-T141N-R83W Sec. 6-T141N-R83W Sec. 7-T141N-R83W Sec. 8-T141N-R83W Sec. 9-T141N-R83W Sec. 15-T141N-R83W Sec. 16-T141N-R83W Sec. 17-T141N-R83W Sec. 18-T141N-R83W Sec. 19-T141N-R83W Sec. 20-T141N-R83W Sec. 21-T141N-R83W Sec. 22-T141N-R83W Sec. 28-T141N-R83W Sec. 29-T141N-R83W Sec. 3-T141N-R84W Sec. 10-T141N-R84W Sec. 11-T141N-R84W Sec. 12-T141N-R84W Sec. 13-T141N-R84W Sec. 14-T141N-R84W Sec. 24-T141N-R84W Sec. 15-T142N-R83W Sec. 16-T142N-R83W Sec. 17-T142N-R83W Sec. 19-T142N-R83W Sec. 20-T142N-R83W Sec. 21-T142N-R83W Sec. 22-T142N-R83W Sec. 28-T142N-R83W Sec. 29-T142N-R83W Sec. 30-T142N-R83W Sec. 32-T142N-R83W Sec. 33-T142N-R83W Sec. 25-T142N-R84W Sec. 34-T142N-R84W Sec. 35-T142N-R84W Sec. 36-T142N-R84W
BNI Coal, Ltd. (f/k/a Baukol-Noonan, Inc.)	1637 Burnt Boat Drive, Bismarck, ND 58502	Sec. 32-T142N-R83W
L. D. Jenkins c/o Gentry, LLC	4216 N Portland; Suite 104, Oklahoma City, OK 73112	Sec. 20-T141N-R83W

Mineral Owners, Lessees and Operators	Mailing Address	Legal Description
Willow Point Corporation c/o Gentry, LLC	4216 N Portland; Suite 104, Oklahoma City, OK 73112	Sec. 20-T141N-R83W
Gentry, LLC	4216 N Portland; Suite 104, Oklahoma City, OK 73112	Sec. 20-T141N-R83W
Otter Creek Mining Company, L.L.C.	2000 Schafer Street, Suite D, Bismarck, ND 58501	Sec. 15-T142N-R83W
Consolidation Coal Company	1800 Washington Road, Pittsburgh, PA 15241 AND Koppers Building, 436 7th Avenue, Pittsburgh, PA 15219	Sec. 11-T141N-R84W
William Coal Corporation	801 Wilmington Trust Building Wilmington, DE 19801	Sec. 11-T141N-R84W

2.0 GEOLOGIC EXHIBITS

2.1 Overview of Project Area Geology

The proposed Tundra SGS carbon dioxide (CO₂) storage project will be situated near the Milton R. Young Station (MRYS) southeast of Center, North Dakota (Figures 2-1 and 2-2). This project site is on the eastern flank of the Williston Basin.

Overall, the stratigraphy of the Williston Basin has been well-studied, particularly the numerous oil-bearing formations. Through research conducted via the Plains CO₂ Reduction (PCOR) Partnership, the Williston Basin has been identified as an excellent candidate for long-term CO₂ storage due, in part, to the thick sequence of clastic and carbonate sedimentary rocks and the basin's subtle structural character and tectonic stability (Peck, 2014; Glazewski, 2015).

The target CO₂ storage reservoirs addressed in this CO₂ storage facility permit for Tundra SGS are the predominantly sandstone horizons of the Black Island and Deadwood Formations, lying about 9,280 ft below MRYS. Shales of the Icebox Formation conformably overly the Black Island and serve as the primary confining zone (Figure 2-3). The continuous shales of the Deadwood Formation B member serve as the lower confining zone (Figure 2-3). Together, the Icebox, Black Island, and Deadwood Formations comprise this CO₂ storage complex for Tundra SGS (Table 2-1).

In addition to the Icebox Formation, there is 570 ft of impermeable rock formations between the Black Island Formation and the next overlying porous zone, the Red River Formation. An additional 7400 ft of section including several thousands of feet of impermeable intervals separate the Black Island and the lowest underground source of drinking water (USDW), the Fox Hills Formation (Figure 2-3).

2.2 Data and Information Sources

Several sets of data were used to characterize the injection and confining zones to establish their suitability for storage and containment of injected CO₂. Data sets used for characterization included both existing data (sources and uses are discussed within Section 2.2.1) and site-specific data acquired by the applicant to characterize the storage complex.

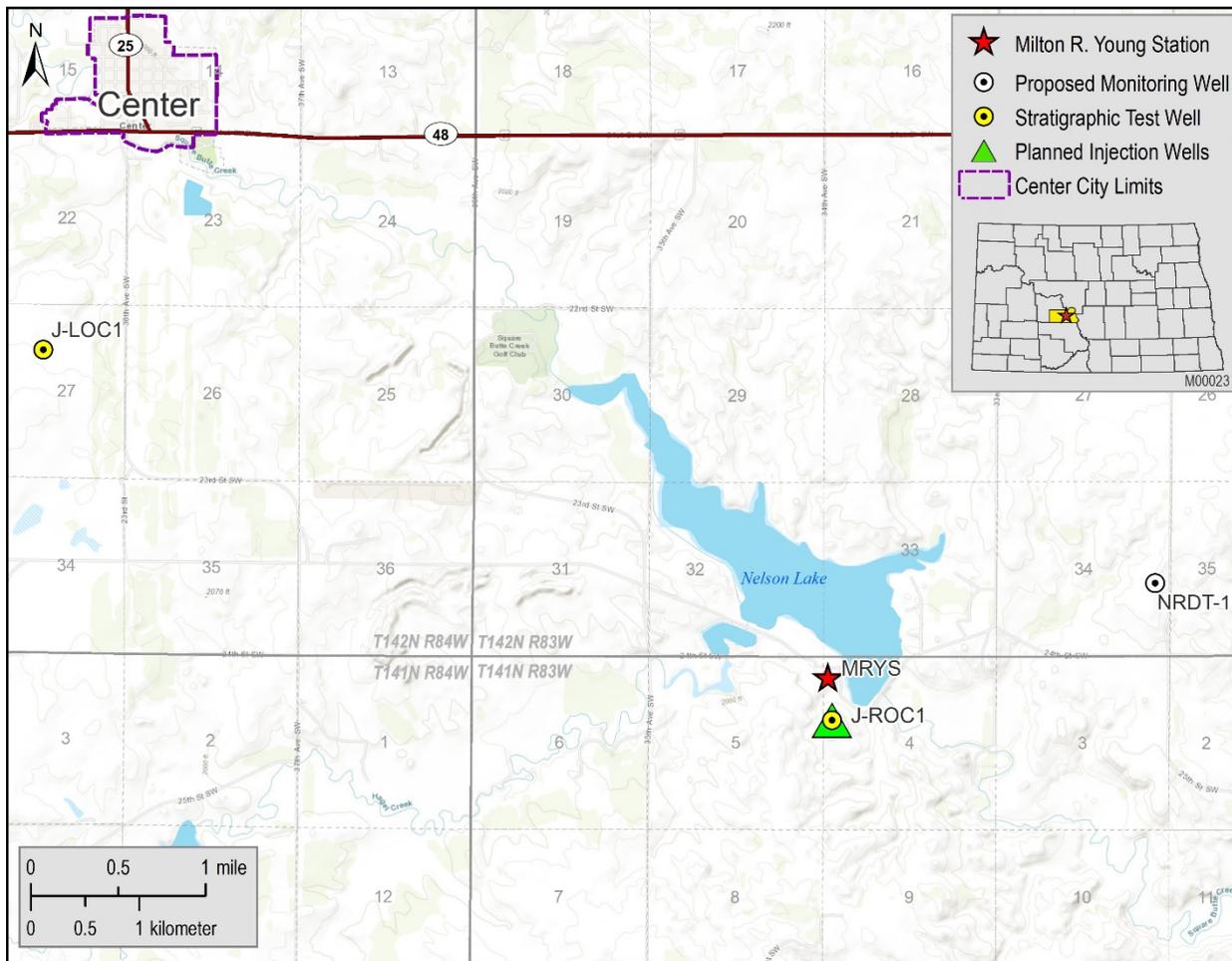


Figure 2-1. Topographic map of the Tundra SGS area showing well locations and MRYS.

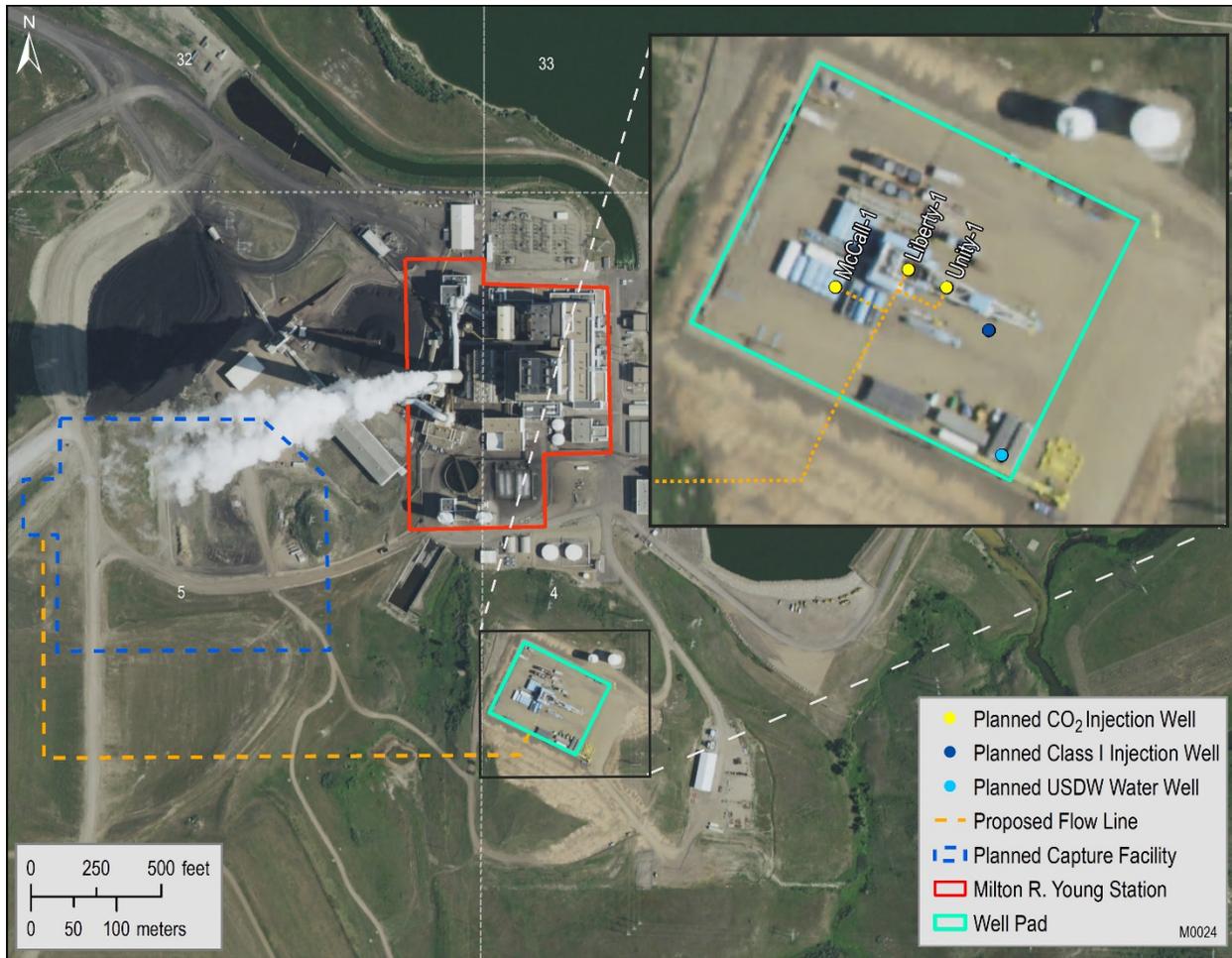


Figure 2-2. Topographic map of the proposed CO₂ flowlines and well pad layout.

2.2.1 Existing Data

Existing data used to characterize the geology beneath the Tundra SGS site included publicly available well logs and formation top depths acquired from the North Dakota Industrial Commission's (NDIC's) online database. Well log data and interpreted formation top depths were acquired for 13 wellbores within a 56-mi radius of the proposed storage site (Figure 2-4). These data were used to characterize the depth, thickness, and extent of the subsurface geologic formations. Existing laboratory measurements from Deadwood Formation core samples were available from one well: J-LOC1 (NDIC File No. 37380). These measurements were compiled and used to establish relationships between measured petrophysical characteristics and estimates from well log data. Two 3D surveys totaling 18.5 mi² (6.5-mi² west 3D and 12-mi² east 3D), encompassing the J-LOC1 and J-ROC1 wellsites, were examined to understand the heterogeneity and geologic structure of the Black Island and Deadwood Formations.

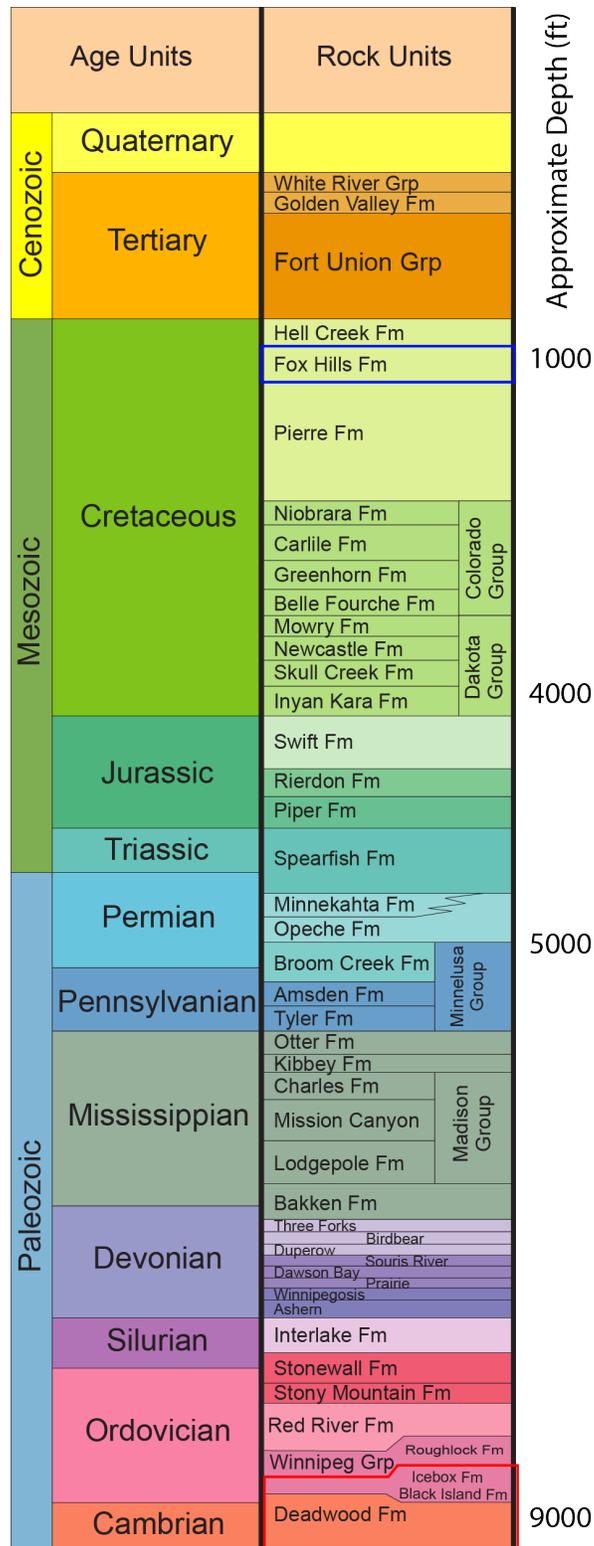


Figure 2-3. Stratigraphic column identifying the storage reservoir, confining zones, and lowest USDW addressed in this permit application for Tundra SGS.

Table 2-1. Formations Comprising the Tundra SGS CO₂ Storage Complex

	Formation	Purpose	Average Thickness	Average Depth	Lithology
			at Tundra SGS Site, ft	Tundra SGS Site, ft TVD	
Storage Complex	Icebox	Upper confining zone	118 (58 to 176)	9,308	Shale
	Black Island and Deadwood E member	Storage reservoir (i.e., injection zone)	118 (35 to 202)	9,427	Sandstone, shale, dolostone, limestone
	Deadwood C member sand	Storage reservoir (i.e., injection zone)	64 (40 to 88)	9,773	Sandstone
	Deadwood B member shale	Lower confining zone	34 (20 to 49)	9,791	Shale

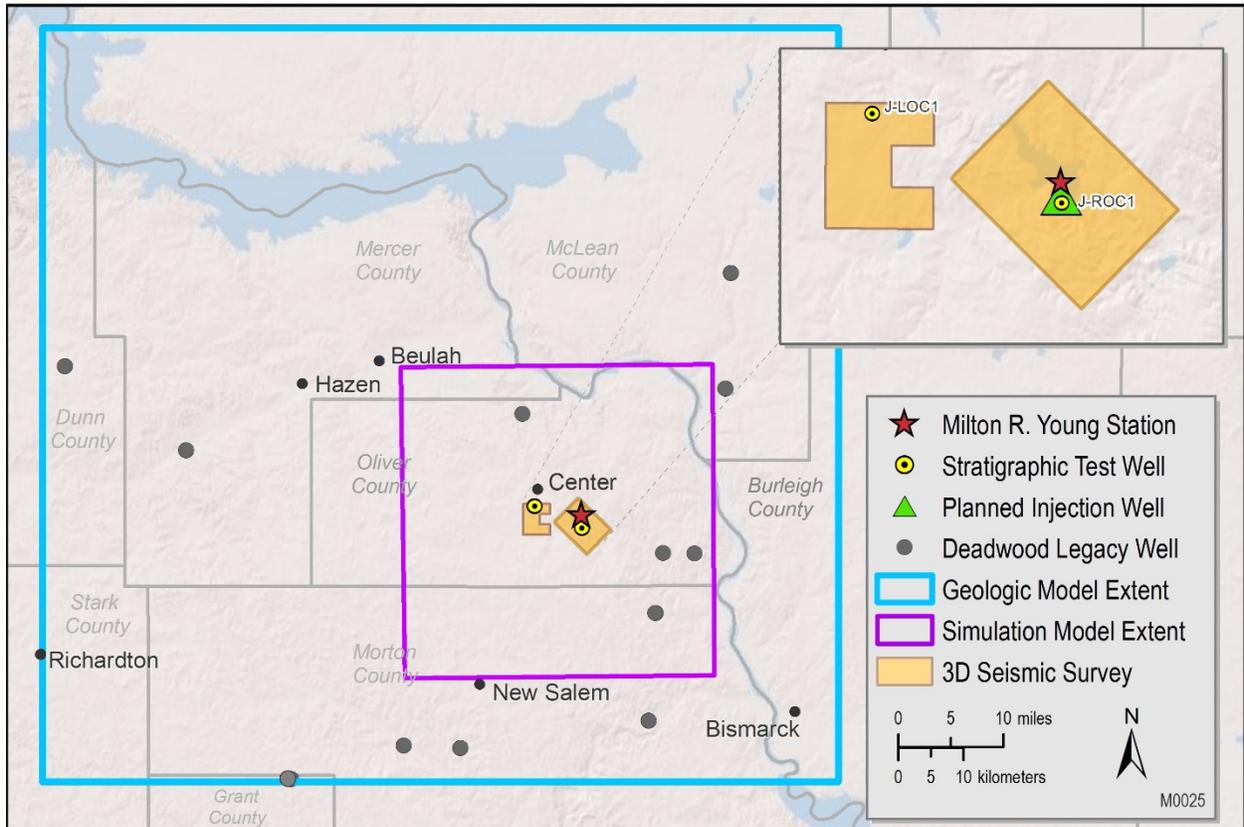


Figure 2-4. Map showing the extent of the regional geologic model, distribution of well control points, and extent of the simulation model. The wells shown penetrate the storage reservoir and the upper and lower confining zones.

2.2.2 *Site-Specific Data*

Site-specific efforts to characterize the proposed storage complex generated multiple data sets, including geophysical well logs, petrophysical data, fluid analyses, and 3D seismic data. In 2020, the J-LOC1 and J-ROC1 wells were drilled specifically to gather subsurface geologic data to support the development of a CO₂ storage facility permit. J-LOC1 was drilled to a depth of 10,477 ft, and J-ROC1 was drilled to a depth of 9,893 ft. A downhole sampling and measurement program focused on the proposed storage complex (i.e., the Black Island and Deadwood Formations [Figure 2-5a and 2-5b]). Additional characterization efforts focused on the Inyan Kara Formation interval and Broom Creek Formation interval as potential CO₂ storage reservoirs.

Site-specific data were used to assess the suitability of the storage complex for safe and permanent storage of CO₂ and were inputs for geologic model construction (Appendix A), numerical simulations of CO₂ injection (Appendix A), geochemical simulation (Sections 2.3.3 and 2.4.1.2), and geomechanical analysis (Section 2.4.4). The improved understanding of the subsurface provided by the site-specific data directly informed the selection of monitoring technologies, development of the timing and frequency of monitoring data collection, and interpretation of the monitoring data with respect to potential subsurface risks (Section 4.1). Furthermore, these data guide and influence the design and operation of site equipment and infrastructure (Sections 4.5 and 5.0).

2.2.2.1 *Geophysical Well Logs*

Openhole wireline geophysical well logs were acquired in the J-LOC1 and J-ROC1 wells along the entire open section of the wellbore. The logging suite included caliper, gamma ray (GR), density, porosity (neutron, density), dipole sonic, resistivity, spectral GR, a combinable magnetic resonance (CMR), and fracture finder log.

The acquired well logs were used to pick formation top depths and interpret lithology, petrophysical properties, and time-to-depth shifting of seismic data. Formation top depths were picked from the top of the Pierre Formation to the top of the Precambrian. The site-specific formation top depths were added to the existing data of the 13 wellbores within a 56-mi radius of the study area to understand the geologic extent, depth, and thickness of the subsurface geologic strata. Formation top depths were interpolated to create structural surfaces which served as inputs for geologic model construction.

2.2.2.2 *Core Sample Analyses*

Nearly 600 ft of core was collected in the Black Island and Deadwood storage complexes from J-LOC1, and 616 ft of core was collected from J-ROC1. This core was analyzed to characterize the lithologies of the Precambrian, Deadwood, Black Island, and Icebox Formations and correlated to well log data. Core analysis for the J-LOC1 included porosity and permeability measurements, x-ray diffraction (XRD), x-ray fluorescence (XRF), relative permeability testing, thin-section analysis, capillary entry pressure measurements, and triaxial geomechanics testing. The results were used to inform geologic modeling, predictive simulation inputs and assumptions, geochemical modeling, and geomechanical modeling.

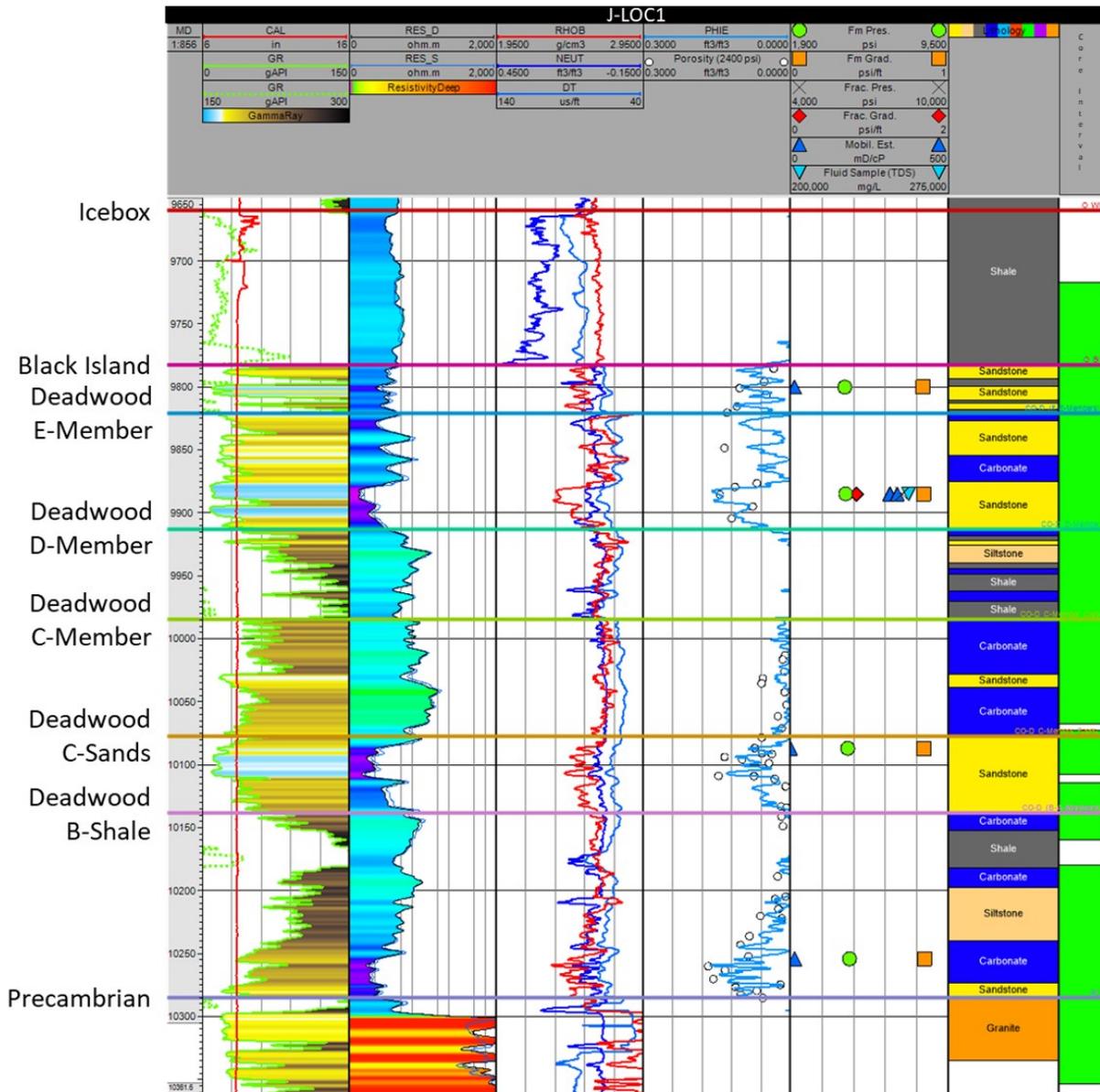


Figure 2-5a. Schematic showing vertical relationship of coring and testing intervals in the Icebox, Black Island, and Deadwood Formations and the Precambrian basement in the J-LOC1 well.

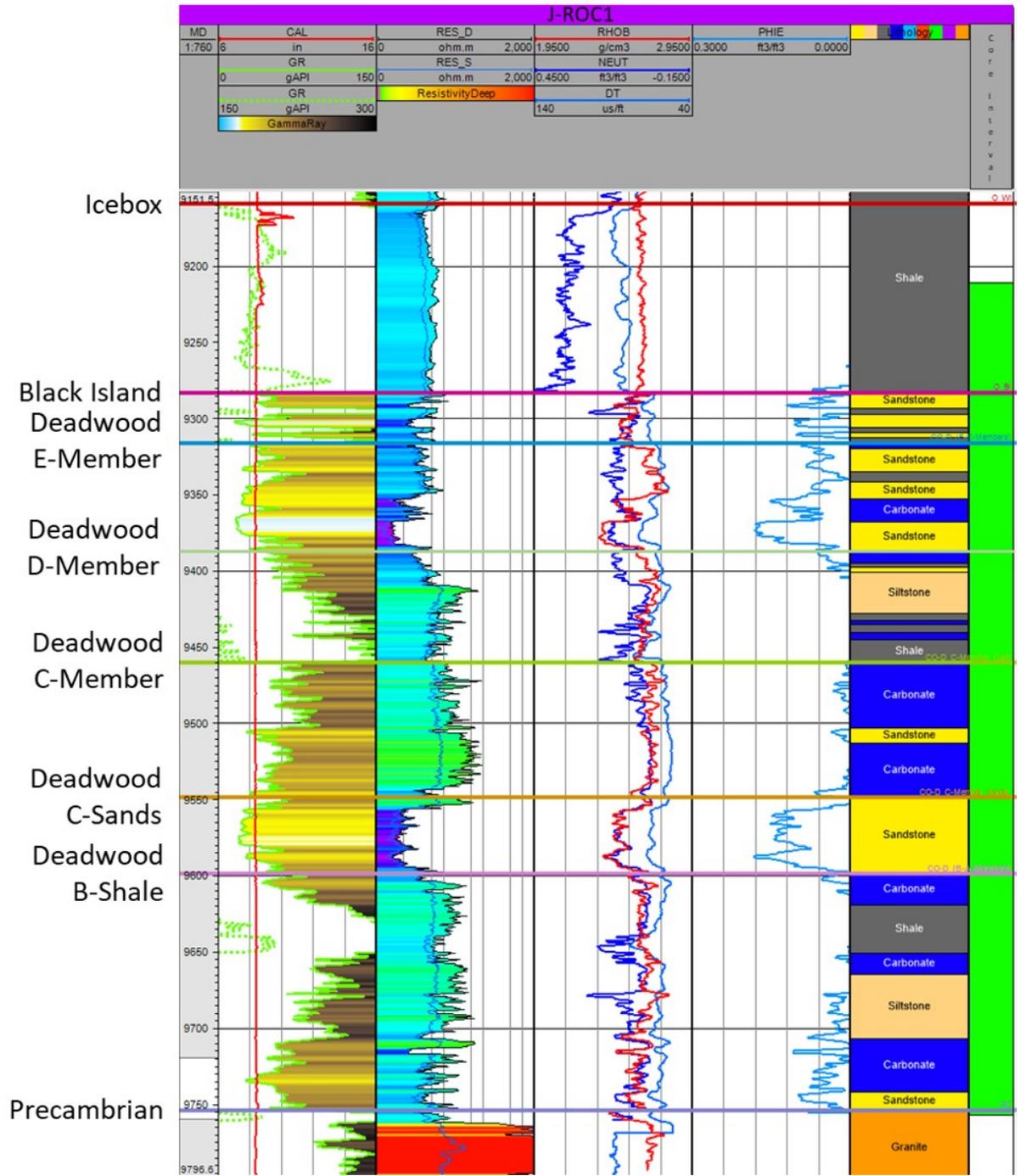


Figure 2-5b. Schematic showing vertical relationship of coring and testing intervals in the Icebox, Black Island, and Deadwood Formations and the Precambrian basement in the J-ROC1 well.

2.2.2.3 Formation Temperature and Pressure

Temperature data recorded from logging the J-LOC1 wellbore were used to derive a temperature gradient for the proposed injection site (Table 2-2). In combination with depth, the temperature gradient was used to distribute a temperature property throughout the geologic model of the study area. The temperature property was then used primarily to inform predictive simulation inputs and assumptions. Temperature data were also used as inputs for the geochemical modeling.

Pressure testing at J-LOC1 was performed with the Schlumberger MDT (modular formation dynamics testing) tool. A wireline-conveyed tool assembly incorporated a dual-packer module to isolate intervals, a large-diameter probe for formation pressure and temperature measurements, a pump-out module to pump unwanted mud filtrate, a flow control module, and sample chambers for formation fluid collection; see Appendix D, “Schlumberger, MDT.” The MDT tool formation pressure measurements from the Black Island and Deadwood Formations are included in Table 2-3. The calculated pressure gradients were used to model formation pressure profiles for use in the numerical simulations of CO₂ injection.

Table 2-2. Description of J-LOC1 Temperature Measurements and Calculated Temperature Gradients

Formation	Test Depth, ft	Temperature, °F
Icebox	9,751.17	182.97
	9,800.01	180.66
Black Island	9,884.89	182.94
Deadwood	9,885.14	180.68
	10,087.45	181.44
	10,254.12	184.26
Mean Black Island/Deadwood Temp., °F		182.00
Deadwood Temperature Gradient, °F/ft		0.01*

* The Black Island/Deadwood temperature gradient is an average of the MDT tool measured temperatures minus the average annual surface temperature of 40°F, divided by the associated test depth.

Table 2-3. Description of J-LOC1 Formation Pressure Measurements and Calculated Pressure Gradients

Formation	Test Depth, ft	Formation Pressure, psi
Black Island	9,800.01	4,506.66
Deadwood	9,884.89	4,548.42
Deadwood	9,885.14	4,548.27
Deadwood	10,087.45	4,650.86
Deadwood	10,254.12	4,734.49
Mean Black Island/Deadwood Pressure, psi		4,597.74
Deadwood Pressure Gradient, psi/ft		0.46*

* The Black Island/Deadwood pressure gradient is an average of the MDT tool measured pressures minus standard atmospheric pressure at 14.7 psi, divided by the associated test depth.

2.2.2.4 Microfracture In Situ Stress Tests

Using the Schlumberger MDT tool, microfracture in situ stress tests were performed in the J-LOC1 well. In situ reservoir testing measurements provide real-time formation pressure, formation temperature, fracture breakdown, propagation, and closure pressures. Microfracture in situ stress tests were attempted in the J-ROC1 well; however, because of extremely unstable wellbore conditions, the MDT stress tool run was not performed after a near loss of the tool in the wellbore.

Microfracture in situ stress tests were performed on the Icebox and Deadwood Formations in J-LOC1 (Table 2-4). The use of the dual-packer module on the MDT tool assembly to isolate the designated intervals tested a 1.5-ft section of the zone of interest. Fracture propagation pressures determined from the microfracture test in the J-LOC1 well were used to calculate pressure constraints related to the maximum allowable bottomhole pressure.

In the J-LOC1 wellbore, two microfracture in situ stress tests were performed in the Icebox Formation at 9,749.5 and 9,751.2 ft (Table 2-4). The interpretation of the results is provided in Section 2.4 Storage Reservoir Confinement Zone. Neither of the two tests attempted in the Icebox Formation were successful in depicting the formation breakdown pressure, with one predominant reason being the limitations of the dual-packer mechanical specifications having a set maximum differential pressure rating between the upper packer and hydrostatic pressure of 5,500 psi; see Appendix D, “Schlumberger Dual-Packer Module.” The inability to break down the Icebox Formation at the two depths indicated that the formation is very tight competent rock and exhibits sufficient geologic integrity to contain the injected CO₂ stream. One microfracture in situ stress test was performed in the Deadwood Formation, at 9,885.1 ft, with interpretation of the results provided in Section 2.3 Storage Reservoir Injection Zone (Table 2-4).

Table 2-4. Description of J-LOC1 Microfracture In Situ Stress Tests

Formation	Test Depth ft	Breakdown Pressure		Propagation Pressure		Closure Pressure		Initial Shut-In Pressure	
		psi	Gradient, psi/ft	Avg., psi	Gradient, psi/ft	Avg., psi	Gradient, psi/ft	Avg., psi	Gradient, psi/ft
Icebox	9,749.5	No observed formation breakdown. Maximum applied injection pressure = 10,984.9 psi							
	9,751.2	No observed formation breakdown. Maximum applied injection pressure = 10,867.24 psi							
Deadwood	9,885.1	8,231	0.833	7,450	0.754	7,393.55	0.748	N/A	

2.2.2.5 Fluid Samples

Fluid samples from the Deadwood Formation were collected from the J-LOC1 wellbore via the MDT tool (Appendix D, “Schlumberger Saturn 3D Radial Probe”). The sample was analyzed by Minnesota Valley Testing Laboratories, a state-certified lab, and confirmed by the Energy & Environmental Research Center (EERC). The sample collected at a depth of 9,884.9 ft had total dissolved solids of 256,000 mg/L. Fluid sample analysis results were used as inputs for geochemical modeling and dynamic reservoir simulations. Fluid sample analysis reports can be found in Appendix B.

In situ pressure testing was performed in the Icebox Formation (upper confining zone) with the MDT tool. This test used the tool’s large-diameter probe to test both the mobility and reservoir pressure (Appendix D). During the test, the formation was unable to rebound (build pressure) because of low (nearly zero) permeability. This result suggested that neither the reservoir pressure nor an in situ fluid sample could be measured or collected from the Icebox Formation. The testing results provide further evidence of the confining properties of the Icebox Formation, ensuring sufficient geologic integrity to contain the injected CO₂ stream.

2.2.2.6 Seismic Survey

A 5-mi-long seismic source test and 6.5-mi² 3D seismic survey were acquired in 2019, and a 12-mi² 3D seismic survey and 21 mi of 2D seismic lines were acquired in 2020 (Figure 2-6). The 3D seismic data allowed for visualization of deep geologic formations at lateral spatial intervals as short as tens of feet. The 2D seismic data provided a means to connect the two

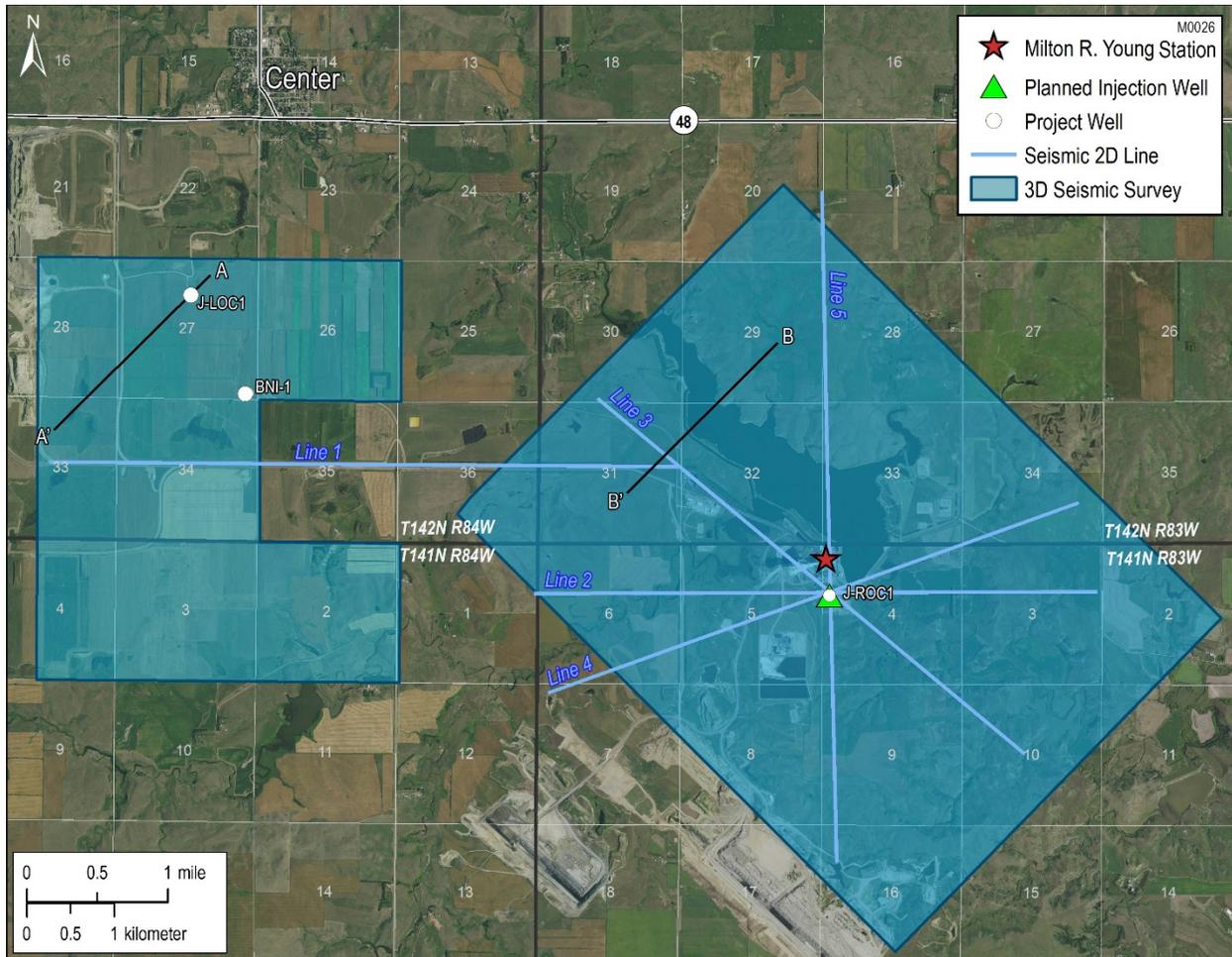


Figure 2-6. Map showing the 2D and 3D seismic surveys in the Tundra SGS area.

3D seismic data sets and ensure consistent interpretation across the entire Tundra SGS area. The seismic data were used for an assessment of the geologic structure, interpretation of interwell heterogeneity, and well placement. Data products generated from the interpretation and inversion of the 3D seismic data were used as inputs into the geologic model. Additionally, the geologic model that was informed by the seismic data was used to simulate migration of the CO₂ plume. These simulated CO₂ plumes were used to inform the testing and monitoring plan (Section 4.0).

The 3D seismic data and J-LOC1 and J-ROC1 well logs were used to interpret surfaces for the formations of interest within the survey area. These surfaces were converted to depth using the time-to-depth relationship derived from the J-LOC1 and J-ROC1 sonic logs. The depth-converted surfaces for the storage reservoir and upper and lower confining zones were used as inputs for the geologic model. These surfaces captured detailed information about the structure and varying thickness of the formations between wells. Interpretation of the 3D seismic data suggests there are no major stratigraphic pinch-outs or structural features with associated spill points in the Black Island/Deadwood storage complex in the Tundra SGS area. There were also no structural features, faults, or discontinuities that would cause a concern about seal integrity in the strata above the Black Island Formation observed in the seismic data.

In addition, the 3D seismic data were used to gain a better understanding of interwell heterogeneity across the Tundra SGS area for petrophysical property distributions. Acoustic impedance volumes were created using the 3D seismic and petrophysical data from the J-LOC1 and J-ROC1 wells (e.g., dipole sonic and density logs) (Figure 2-7). The acoustic impedance volumes were used to classify lithofacies of the Deadwood Formation and distribute lithofacies through the geologic model as well as inform petrophysical property distribution in the geologic model.

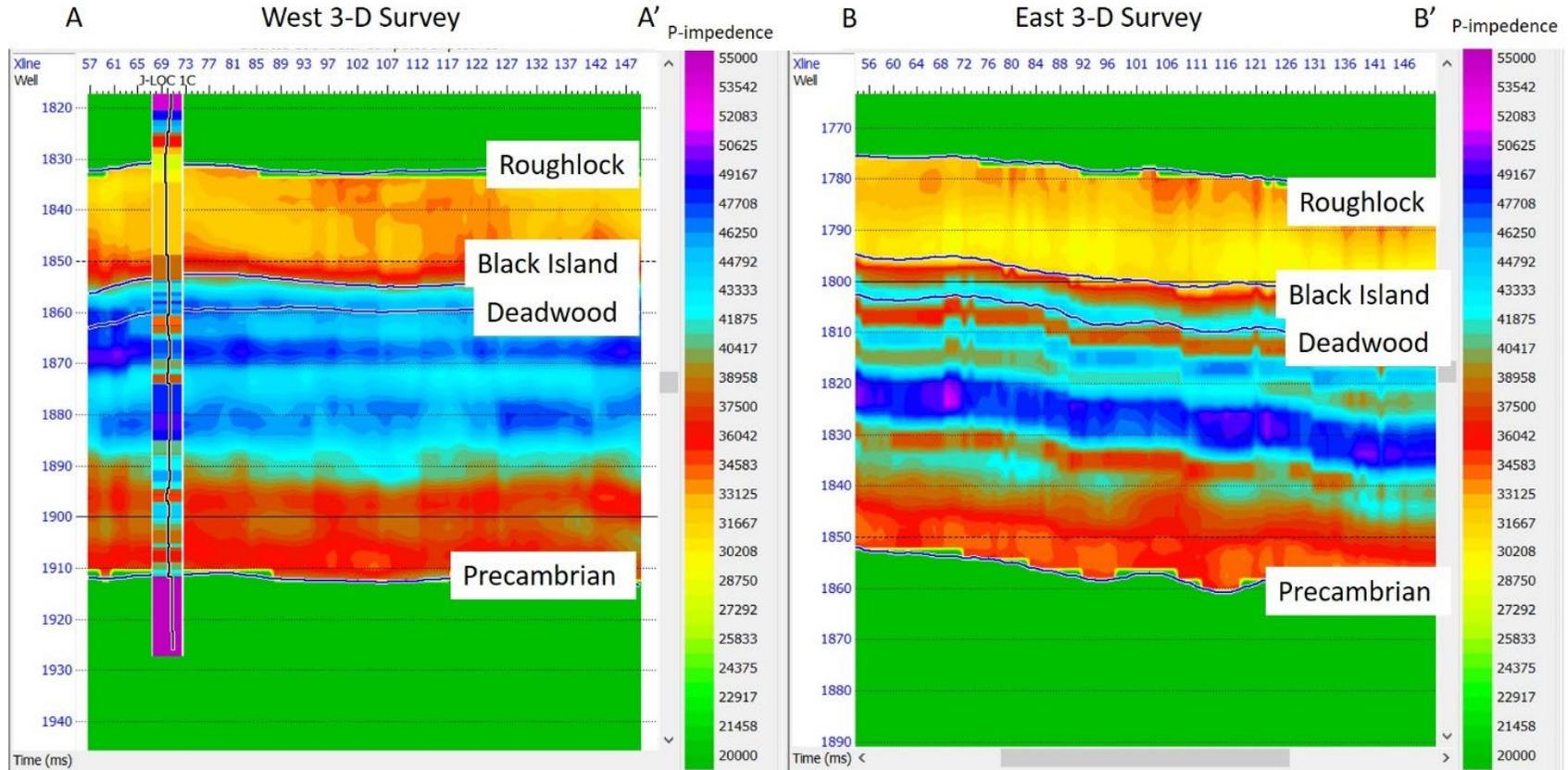


Figure 2-7. Left: cross section of the inverted acoustic impedance volume for the western seismic 3D survey that transects the J-LOC1 well. The acoustic impedance log calculated from the J-LOC1 sonic and density logs is shown on the inset panel. Right: cross section of the inverted acoustic impedance volume for the eastern 3D survey.

2.3 Storage Reservoir (injection zone)

Regionally, the Black Island and Deadwood Formations are laterally extensive (Figure 2-8). The Black Island comprises high-energy shallow marine sandstone (permeable storage intervals) and shale (impermeable layers). The sandy members (C-sand and E member) of the Deadwood Formation comprise reworked quartz arenites of marginal marine environment (Figure 2-9). The Deadwood Formation unconformably overlies the Precambrian basement and is unconformably overlain by the sands of the Black Island Formation followed by the conformable Icebox Formation (Figure 2-3).

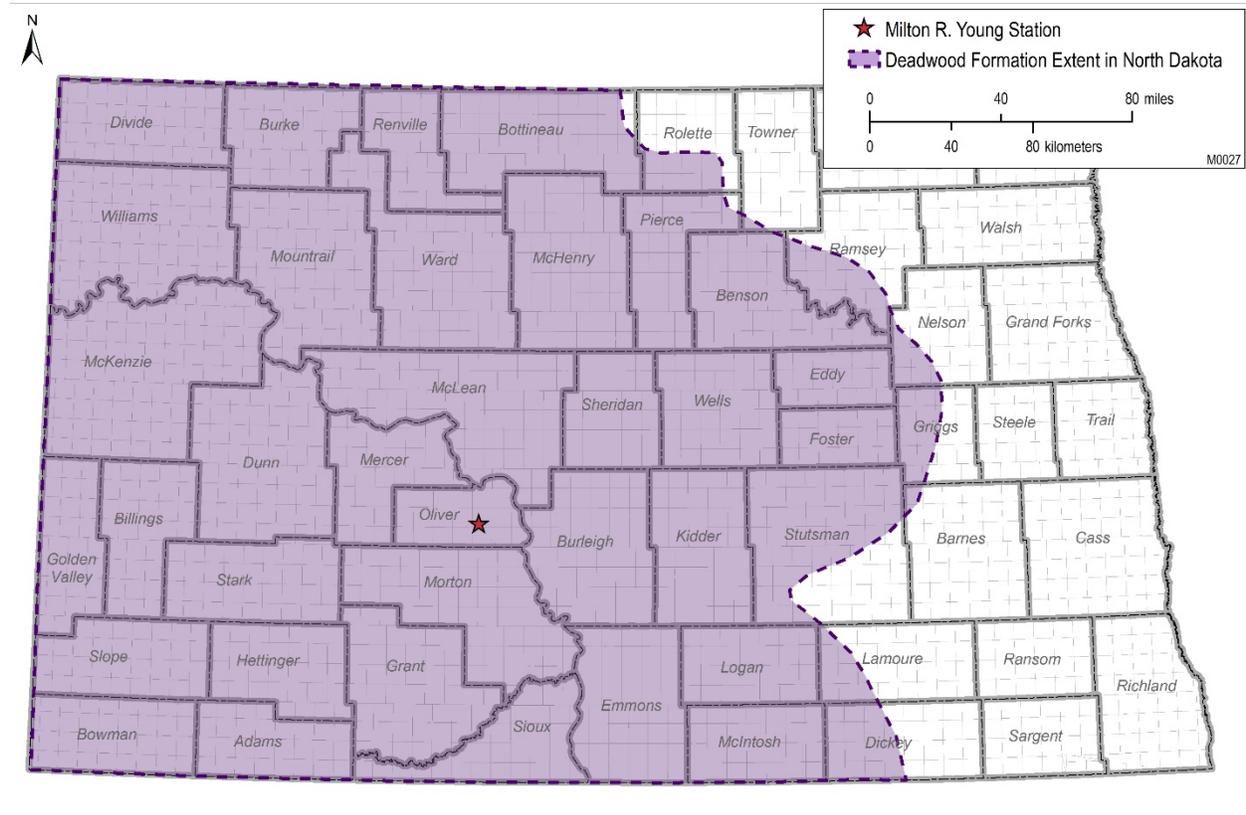


Figure 2-8. Areal extent of the Deadwood Formation in North Dakota (modified from Nesheim, 2012b).

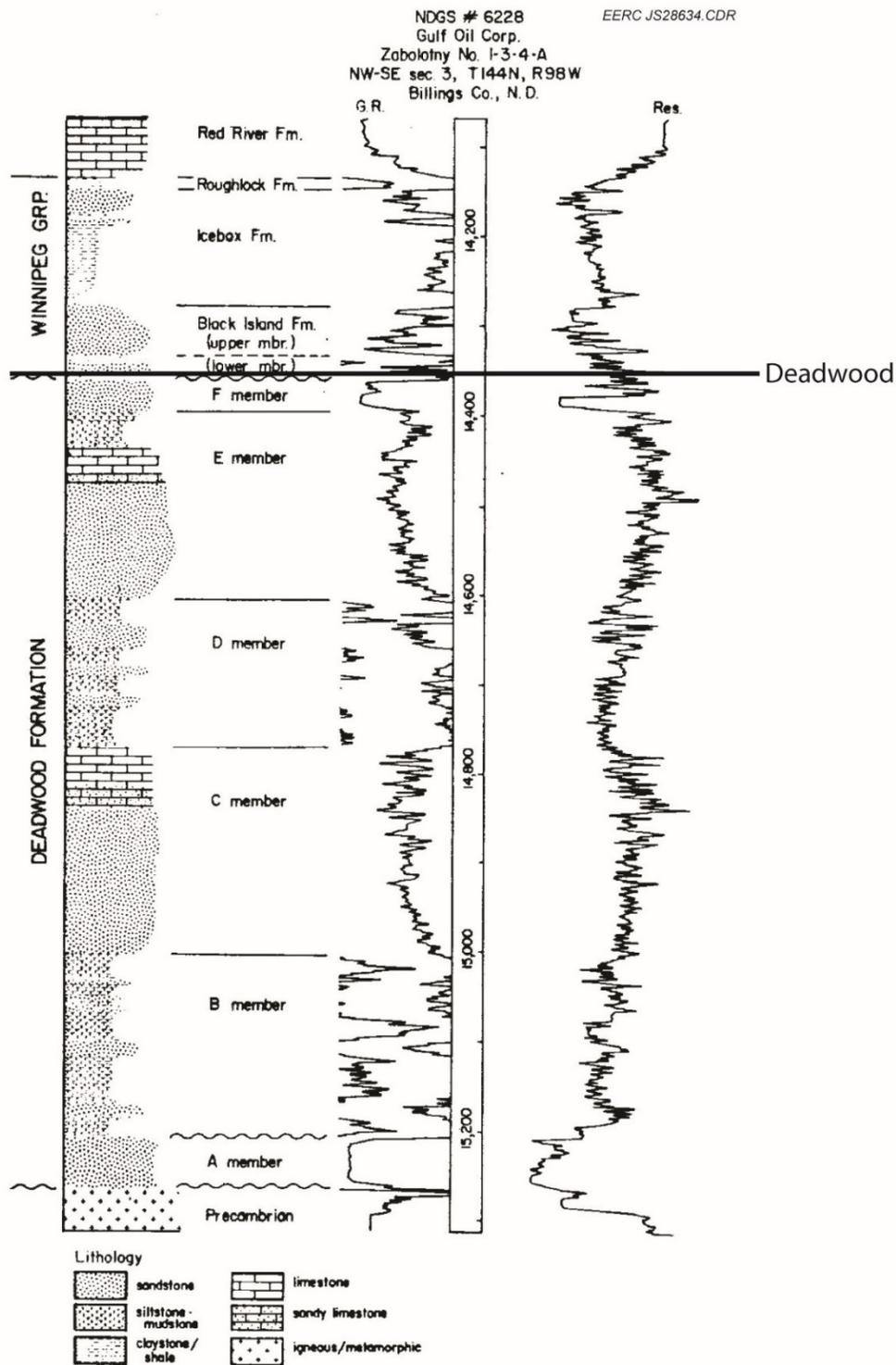


Figure 2-9. Type log showing the interpreted Deadwood members within the Williston Basin (Lefever and others, 1987).

At J-ROC1, the Deadwood C-sand member is made up of 50 ft of sandstone and is located at a depth of 9,548 ft. Across the model area, the Deadwood C-sand member varies in thickness from 40 to 88 ft, with an average thickness of 64 ft. Based on offset well data and geologic model characteristics, the Deadwood C-sand member is 100% sandstone. The Deadwood E member and Black Island Formations are made up of 69 ft of sandstone and 19 ft of dolostone and limestone at J-ROC1 and are located at a depth of 9,283 ft. Across the project area, the Deadwood E member varies in thickness from 0 to 139 ft, with an average thickness of 81 ft. The Black Island Formation varies in thickness from 14 to 77 ft, with an average of 36 ft. Based on offset well data and geologic model characteristics, the net reservoir thickness within the project area ranges from 63 to 287 ft, with an average of 165 ft (Figure 2-10).

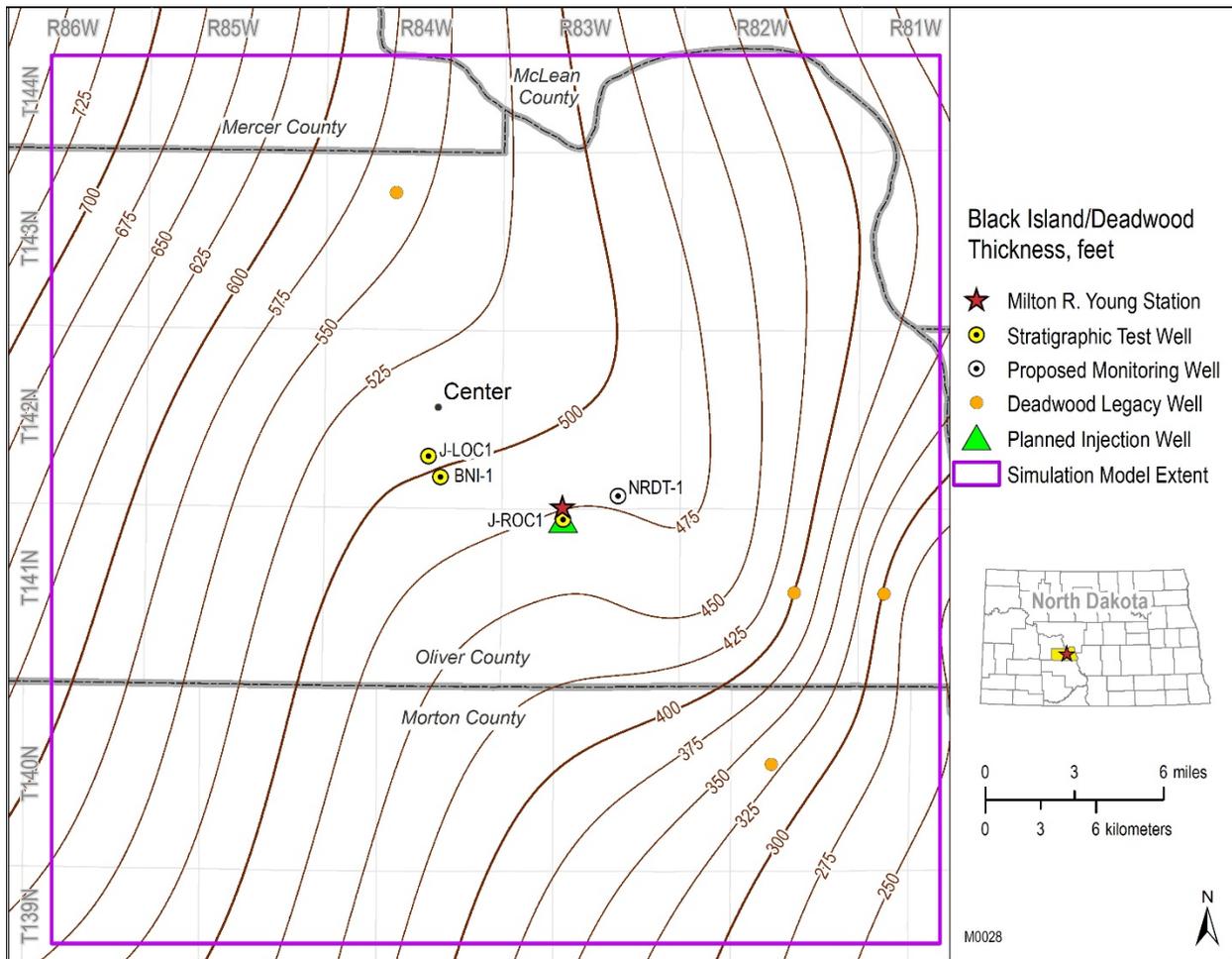


Figure 2-10. Isopach map of the Black Island and Deadwood Formations in the simulation model extent.

The well log signatures for the Black Island and Deadwood storage complex are consistent and predictable across the project area. The following are the correlation definitions used to indicate the reservoir and confining zones (Figure 2-11):

- The Icebox Formation is indicated at the transitions between a moderate GR, higher resistivity, low neutron, high density, and moderate compressional sonic for the base of the Roughlock Formation to the high GR, low resistivity, high neutron, high density, and high compressional sonic. The Icebox Formation is correlative across the project area.
- The Black Island Formation is indicated by the transition from the Icebox Formation to a relatively low GR, low neutron, high density, and low compressional sonic. The Black Island has interbedded high-GR and moderate-resistivity sections.
- The Deadwood Formation (Deadwood E member) is indicated by a transition from the base high GR signature of the Black Island Formation to a low GR signature, lower neutron, higher density, and lower compressional sonic. The Deadwood E thins from west to east across the project area.
- The Deadwood D member (base of Deadwood E member) is indicated by a transition to moderate to higher GR from top to base, higher resistivity, low neutron, high density, and low to higher compressional sonic from top to base.
- The Deadwood C member is the transition between the high GR of the Deadwood D member and moderate GR, higher resistivity, low neutron, high density, and low compressional sonic. The Deadwood C-sand member at the base of the Deadwood C member is indicated by a section of low GR (10 API), low resistivity, moderate neutron, moderate density, and moderate compressional sonic.
- The Deadwood B member (base of Deadwood C-sand member) is indicated by the transition from a low GR signature of the Deadwood C-sand member to a high GR, higher resistivity, low neutron, high density, and higher compressional sonic.
- The Deadwood B member shale unit is indicated by a higher GR, moderate resistivity, higher neutron, moderate density, and high compressional sonic. This unit is contained within the Deadwood B member and can be correlated across the project area.
- The Precambrian basement is indicated by a change from low to relatively high GR, low-to-moderate resistivity, and a lower compressional sonic character that can be correlated across the project area.

Seismic data collected as part of site characterization efforts (Figure 2-6) were used to reinforce structural correlation and thickness estimations of the storage reservoir. The combined structural correlation and analyses indicate that there should be few-to-no major reservoir stratigraphic discontinuities near J-LOC1 and J-ROC1 (Figures 2-12a and 2-12b). The Deadwood E member pinches out 12.5 mi to the east of the J-ROC1 site. A structure map of the Deadwood and Black Island Formations shows no detectable features (e.g., folds, domes, or fault traps) with associated spill points in the project area (Figure 2-13).

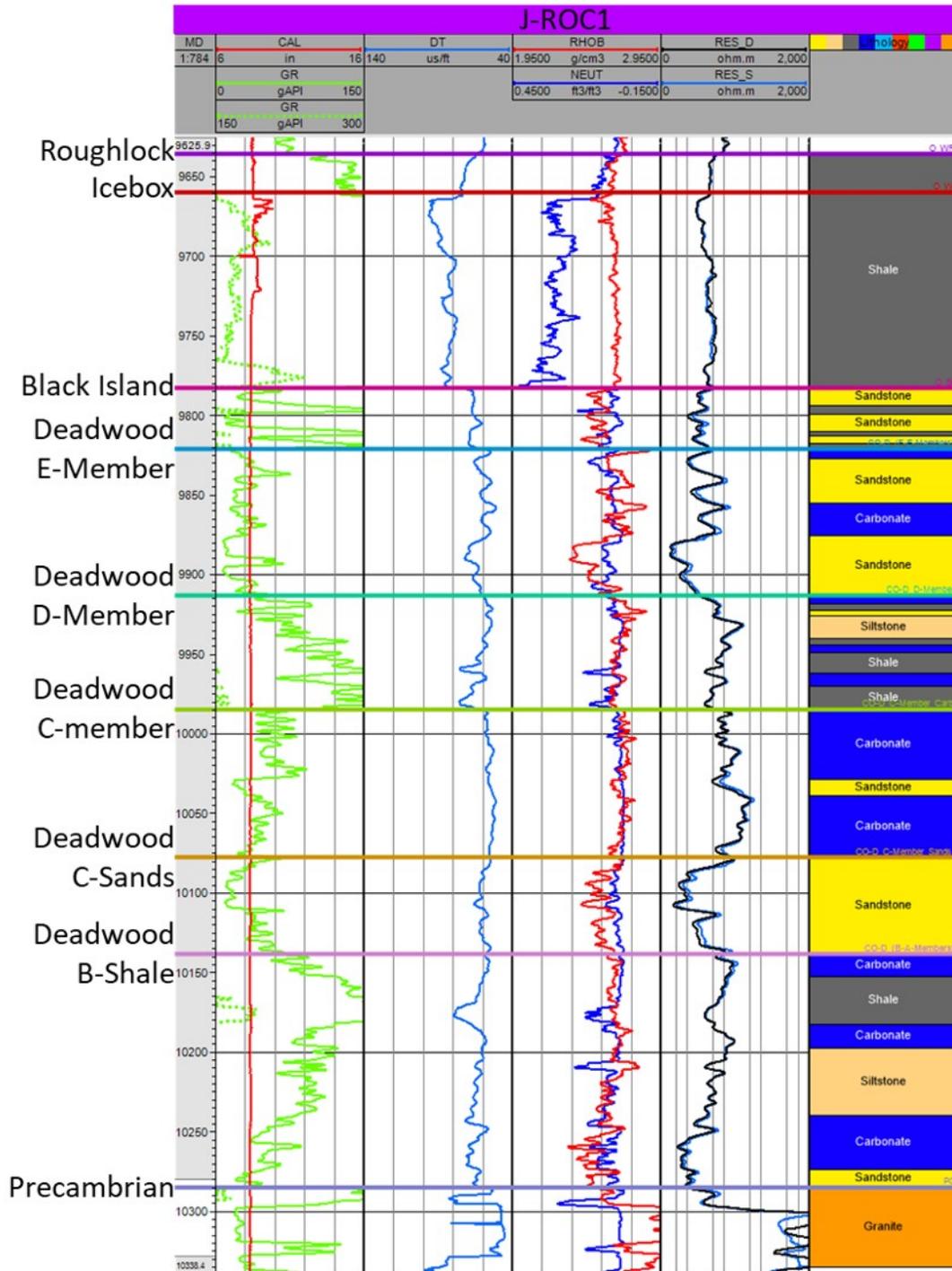


Figure 2-11. Well log display of the interpreted lithologies of the Roughlock, Icebox, Black Island, Deadwood, and Precambrian in J-ROC1.

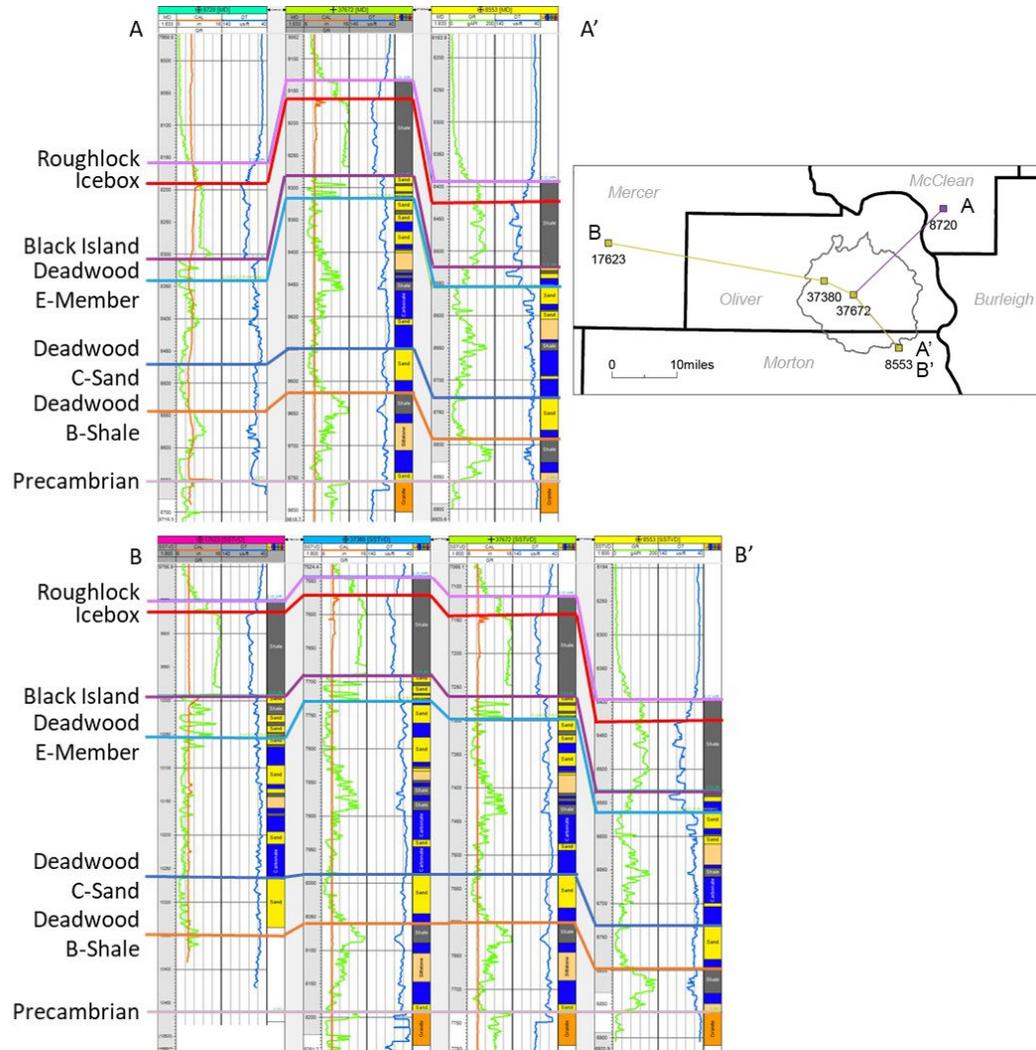


Figure 2-12a. Regional well log stratigraphic cross sections of the Roughlock, Icebox, Black Island, and Deadwood Formations and the Precambrian basement flattened on the top of the Precambrian basement. Logs displayed in tracks from left to right are 1) GR (green) and caliper (red), 2) delta time (blue), and 3) interpreted lithology log.

Note: Wells in these cross sections are spaced evenly. These figures do not portray the relative distance between wells. Because of the spacing, structure may appear more drastic than it actually is.

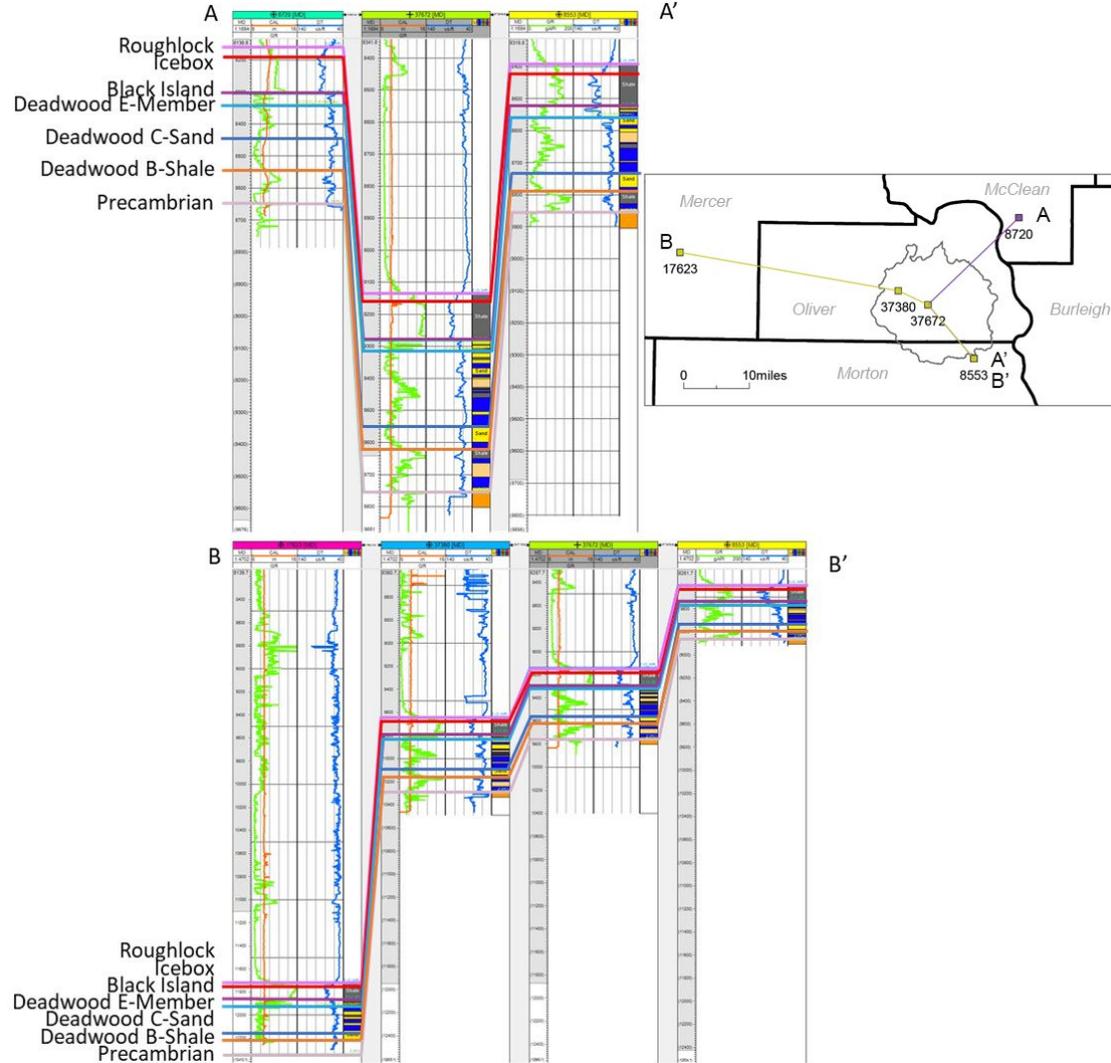


Figure 2-12b. Regional well log cross sections showing the structure of the Roughlock, Icebox, Black Island, and Deadwood Formations and the Precambrian basement. Logs displayed in tracks from left to right are 1) GR (green) and caliper (red) and 2) delta time (blue).

Note: Wells in these cross sections are spaced evenly. These figures do not portray the relative distance between wells. Because of the spacing, structure may appear more drastic than it actually is.

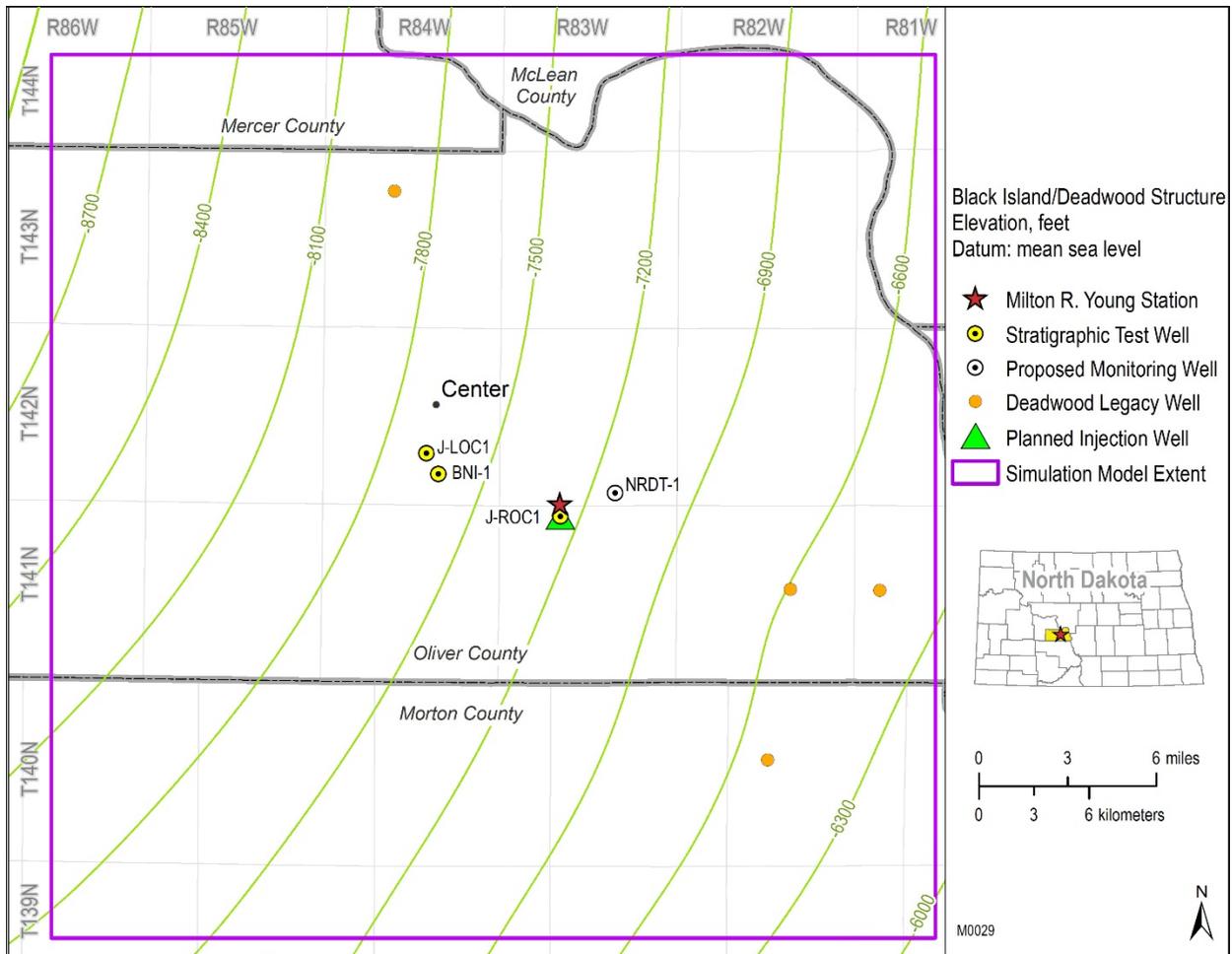


Figure 2-13. Structure map of the Black Island and Deadwood Formations across the simulation model extent.

Eighty-three 1-in.-diameter core plug samples were taken from the sandstone, limestone, and dolostone lithofacies of Deadwood members and Black Island core retrieved from the J-LOC1 well. These core samples were used to determine the distribution of porosity and permeability values throughout the formation.

Analysis of eight core samples of Deadwood E member core from J-LOC1 showed porosity values ranging from 6.85% to 14.3% and permeability ranging from 0.0325 to 2,060 mD. Porosity and permeability measurements from the J-LOC1 Black Island core samples (five) have porosity values ranging from 3.4% to 10.3% and permeability ranging from 0.0019 to 157 mD (Table 2-5). The wide range in porosity and permeability reflects the differences between the sandstone, limestone, and dolostone lithofacies in the Deadwood E member.

Table 2-5. Description of CO₂ Storage Reservoir (injection zone) at the J-LOC1 Well

Injection Zone Properties			
Property	Description		
Formation Name	Black Island, Deadwood E member, and Deadwood C-sand member		
Lithology	Sandstone, dolostone, limestone		
Formation Top Depth, ft	9782.2, 9820.9, and 10,077.4		
Thickness, ft	38.9, 92.3, and 60.9		
Capillary Entry Pressure (CO ₂ /Brine), psi	0.16		
Geologic Properties			
Formation	Property	Laboratory Analysis	Model Property Distribution
Black Island (sandstone)	Porosity, %*	8.0 (3.4–10.3)	5.6 (1.1–14.8)
	Permeability, mD**	3.7 (0.0019–157)	0.805 (<0.0001–96.0)
Deadwood E Member (sandstone)	Porosity, %	10 (6.85–14.43)	7.0 (0–17.7)
	Permeability, mD	5.63 (0.0325–2,060)	3.88 (<0.0001–4549.2)
Deadwood C-Sand Member	Porosity, %	7.6 (1.01–14.69)	7.6 (0.3–17.2)
	Permeability, mD	11 (0.0018–1140)	7.03 (<0.0001–830.3)

* Porosity values are reported as the arithmetic mean followed by the range of values in parentheses.

** Permeability values are reported as the geometric mean followed by the range of values in parentheses.

Analysis of 12 core samples from the sandstone portion of the Deadwood C-sand member core from J-LOC1 showed porosity values ranging from 1.01% to 14.69%, with an average of 7.6%. Permeability of the sandstone samples ranged from 0.0018 to 1,140 mD, with a geometric average of 11 mD (Table 2-5 and Figure 2-14).

Sandstone intervals in the Black Island and Deadwood Formations are associated with low GR, moderate density, average porosity (estimated from neutron, density, and sonic), low resistivity due to high brine salinity, and moderate compressional sonic velocity measurements. The dolostone and limestone intervals in the formation are associated with increased GR measurements compared to the sandstone intervals, in addition to high density, low porosity (estimated from neutron, density, and sonic), relatively high resistivity, and low sonic velocity measurements.

Core-derived measurements were used as the foundation for the generation of porosity and permeability properties within the 3D geologic model (Figure 2-15). The core sample measurements showed good agreement with the wireline logs collected from J-LOC1. This agreement allowed for confident extrapolation of porosity and permeability from offset well logs, thus creating a spatially and computationally larger data set to populate the geologic model. The model property distribution statistics shown in Table 2-5 were derived from a combination of the core analysis and the larger data set derived from offset well logs. A 5 multiplier for permeability was applied to the geologic model based on injection test results (Appendix A).

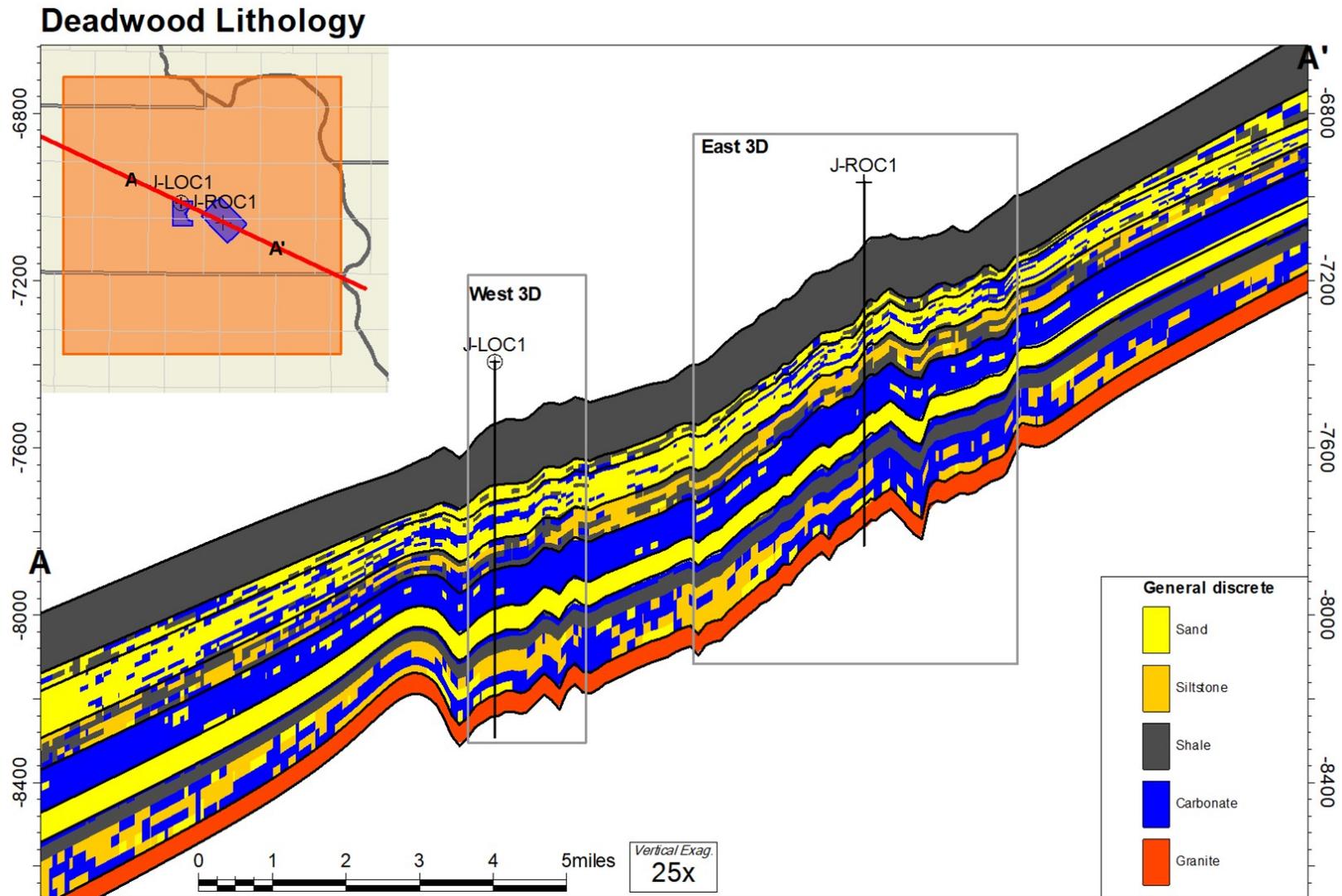


Figure 2-14. Cross section of the Tundra SGS CO₂ storage complex from the geologic model showing lithofacies distribution in the Deadwood Formation. Depths are referenced to mean sea level.

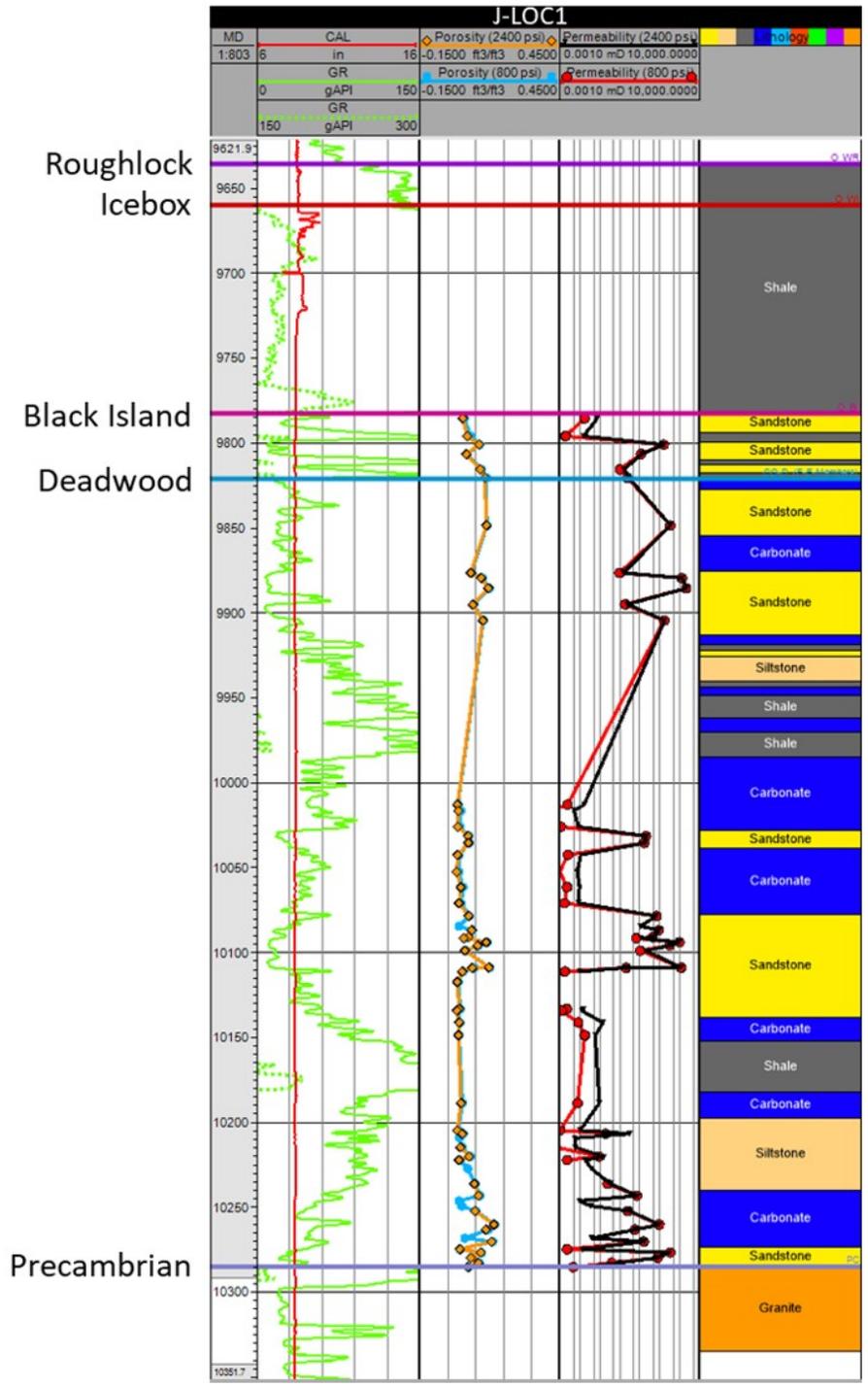


Figure 2-15. Vertical distribution of core-derived porosity and permeability values in the Tundra SGS CO₂ storage complex.

Pressure testing in the Deadwood Formation included a total of four formation pressure measurements via an MDT tool in J-LOC1. All tests resulted in good agreement, with reservoir pressures recorded that ranged from 4,548.27 to 4,734.49 psi. These pressures were used to derive a pressure gradient of 0.46 psi/ft. This pressure gradient was used to calculate a formation pressure profile for use in the numerical simulations of CO₂ injection.

A microfracture in situ test was performed within the Deadwood Formation via the Schlumberger MDT tool in the J-LOC1 well. The test was conducted 64.14 ft below the top of the formation. The results of this test are shown in Table 2-6, with a supporting graph for derivation of averages in Figure 2-16.

Table 2-6. Deadwood Microfracture Results from J-LOC1

Depth, ft	9,885.1	
Pressure/Gradient	psi	psi/ft
Breakdown	8,231	0.833
Avg. Fracture Propagation	7450	0.754
Avg. Closure	7,393.55	0.748

The measured temperature of the Deadwood Formation in J-LOC1 was 181.44°F at a depth of 10,087.5 ft. Using an average surface temperature of 40°F, the resulting temperature gradient for the Deadwood Formation is 0.01°F/ft.

$$\frac{181.44^{\circ}\text{F}-40^{\circ}\text{F}}{10087.5 \text{ ft}} = 0.01^{\circ}\text{F/ft} \quad [\text{Eq. 1}]$$

Fluid samples collected via an MDT tool in J-LOC1 from the Deadwood Formation were analyzed by a state-certified lab and confirmed by the EERC. A description of the fluid sample is found in Section 2.2.2.5.

2.3.1 J-LOC1 Injectivity Tests

The J-LOC1 formation well testing was performed specifically to characterize the injectivity and obtain the breakdown pressure of the Deadwood Formation in December 2020. The well testing consisted of step rate test, extended injection test, and pressure fall-off test. The well was perforated from 9,880 to 9,890 ft with 4 shots per foot (spf) and 90° phasing. To record the bottomhole pressure, a downhole memory gauge was installed at a depth of 9,855 ft. The well test data were interpreted by GeothermEx, a Schlumberger Company.

The step rate test was performed with a total of ten injection rates. The initial injection rate was 2.00 barrels per minute (bpm), and the final injection rate was 10.5 bpm. From the step rate test evaluation, no definitive analysis can be concluded from this test, but injection at the higher rate was below fracture opening pressure. Figure 2-17 provides the step rate test data of the Deadwood Formation.

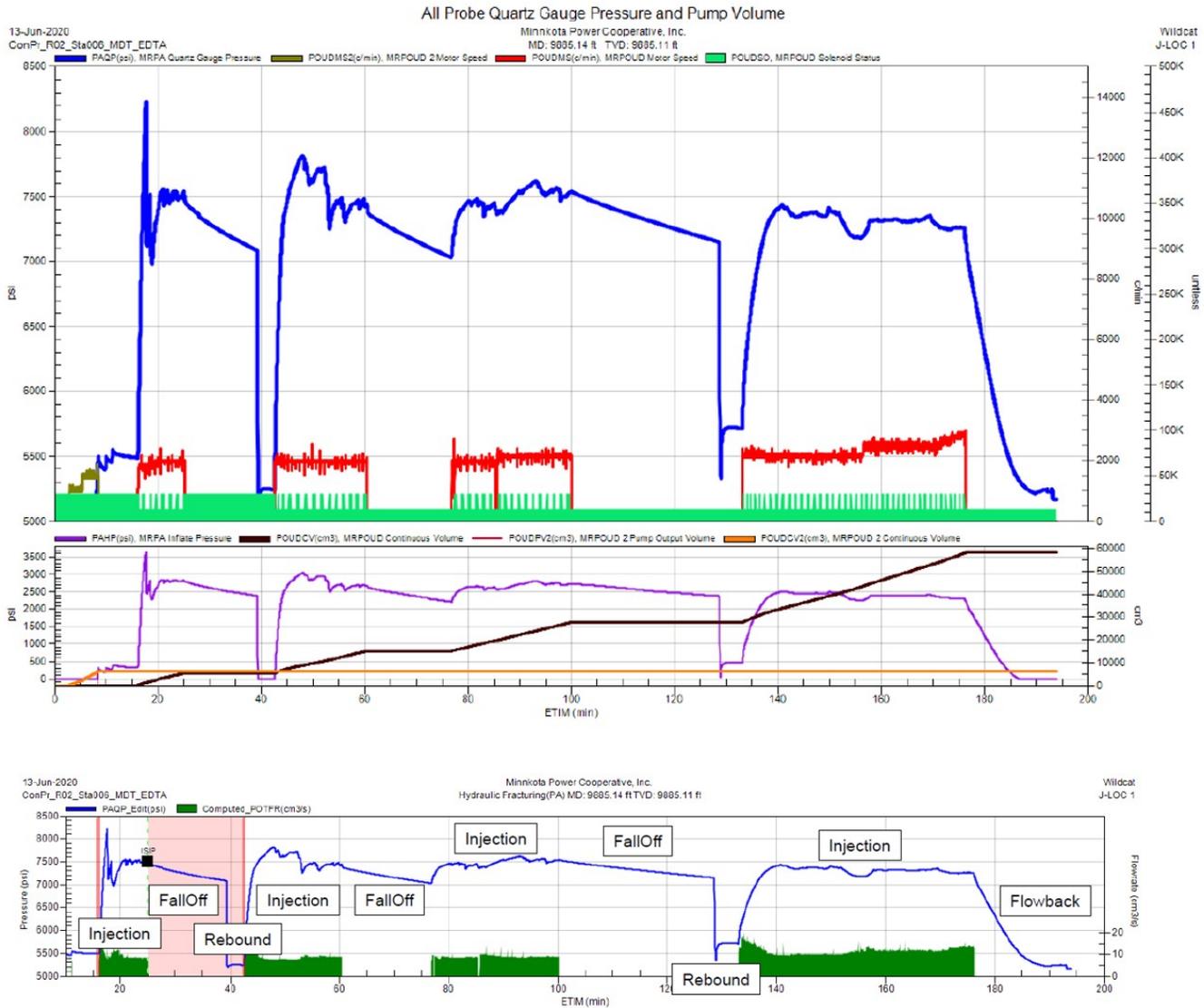


Figure 2-16. J-LOC1 Deadwood Formation MDT microfracture in situ stress pump cycle graph at 9,885.1 ft.

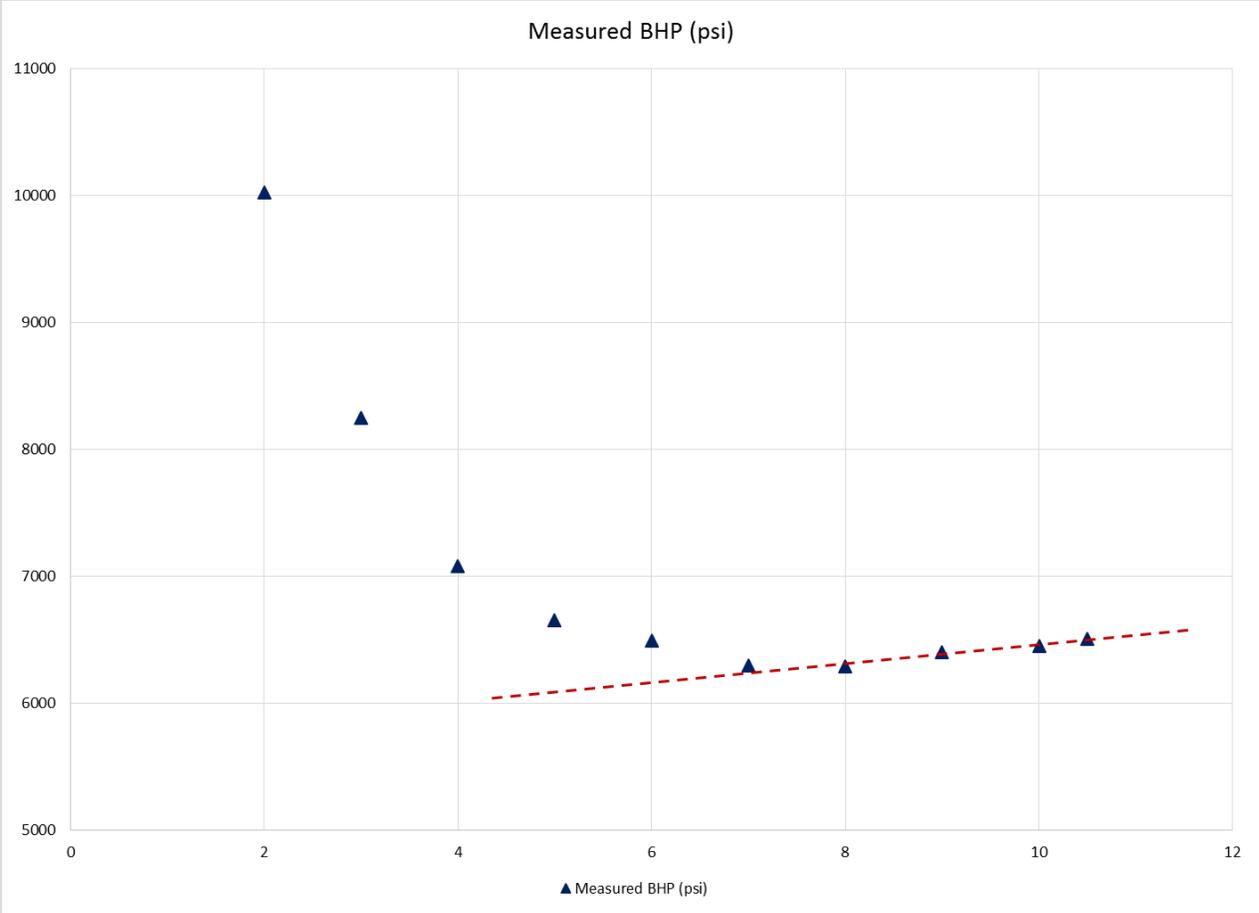


Figure 2-17. Step rate test data from the Deadwood Formation with no fracture opening pressure observed (courtesy of GeothermEx, a Schlumberger Company). The x-axis is injection rate in bpm while the y-axis is bottomhole injection pressure in psi.

A 12-hour extended injection rate was performed at a constant rate of 4.5 bpm followed by a 24-hour pressure fall-off test. The pressure fall-off data interpretation showed a permeability of 1,621 mD, with reservoir pressure of 4,521 psi. There was no lateral boundary observed from the pressure fall-off test within the radius of investigation of 9,183 ft, as shown in Figures 2-18 and 2-19. The Deadwood Formation well testing is summarized in Table 2-7.

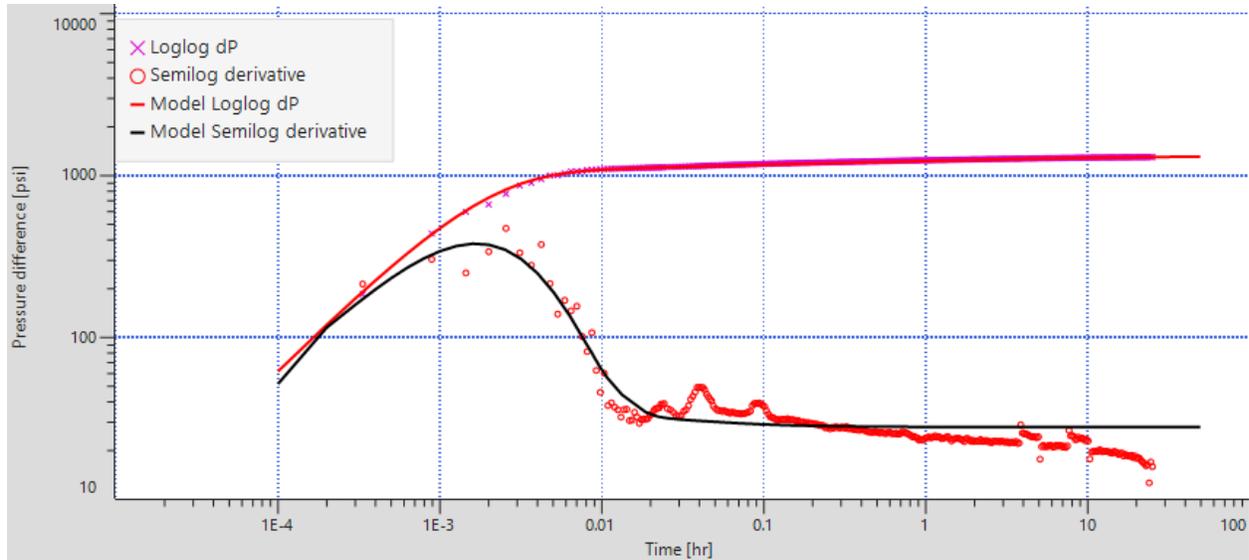


Figure 2-18. GeothermEx interpretation of the Deadwood Formation pressure fall-off test using Saphir – Kappa (courtesy of GeothermEx, a Schlumberger Company).

Formation	Deadwood
Perforation Interval (ft)	9,880 to 9,890
Estimated Formation Thickness (ft)	10
Tested Interval Thickness (ft)	10
Formation Transmissibility (mD.ft)	16,213
Formation Permeability (mD)	1,621
Skin Factor	13
Investigation Radius (ft)	9,183
Boundary Condition	Infinite Acting
Comments	Quality PFO test, good confidence in formation parameters assessed. Step rate test uninterpretable due to near well properties rapidly changing.

Figure 2-19. Deadwood well test summary of J-LOC1 well (modified from Schlumberger's presentation).

Table 2-7. J-LOC1 Deadwood Formation Test Summary

Parameters	Value	Unit
Reservoir Pressure	4,521	psi
Permeability	1,621	mD
Radius of Investigation	9,183	ft
Type of Boundary	Infinite acting	

2.3.2 Mineralogy

The combined interpretation of core, well logs, and thin sections shows that the Deadwood Formation is composed of fine- to medium-grained sandstone and several interbeds of carbonates (dolostone and limestone). Seventy-eight depth intervals representing nearly 274 ft of the Deadwood Formation were sampled for thin-section creation, XRD mineralogical determination, and XRF bulk chemical analysis. For the assessment below, thin sections and XRD provided an independent confirmation of the mineralogical constituents of the Deadwood Formation.

Thin-section analysis of the sandstone intervals shows that quartz (85%) is the dominant mineral. Throughout these intervals are minor occurrences of feldspar (5%), dolomite (5%), and calcite as cements (5%). Where present, calcite and dolomite are crystallized between quartz grains and obstruct the intercrystalline porosity. The contact between grains is long (straight) to tangential. The porosity due to quartz and feldspar dissolution ranges from 5% to 14%.

Four distinct carbonate intervals are notable. The first is the presence of a fine- to medium-grained dolostone (80%), with quartz of variable size and shape (10%) and calcite (10%) present. The porosity is not well-developed, averaging 5%. Diagenesis is expressed by dolomitization of the original calcite grains and dissolution of quartz grains. Fossils are not present in this interval. In the second occurrence of carbonate, the texture becomes coarse and more fossil-rich, comprising fine-grained limestone (80%), dolomite 10%, and quartz (10%). Diagenesis is expressed by dolomitization of the original calcite grains. The porosity is mainly fracture-related and averages 2%.

XRD data from the samples supported facies interpretations from core descriptions and thin-section analysis. The Deadwood Formation core primarily comprises quartz, feldspar, dolomite, calcite, anhydrite, clay, and iron oxides (Figure 2-20).

XRF data are shown in Figure 2-21a and 2-21b for the Black Island and Upper Deadwood Formations. As shown, the majority of the Upper Deadwood sandstone, calcite, and dolomite intervals are confirmed through the high percentages of SiO₂, CaO, and MgO. The presence of certain percentages of CaO and SO₃ at 10,077 ft indicates a presence of anhydrite as cement. The formation shows very little clay, with a range of 0.5% to 10% being the highest detected.

2.3.3 Mechanism of Geologic Confinement

For Tundra SGS, the initial mechanism for geologic confinement of CO₂ injected into the Deadwood Formation will be the cap rock (Icebox interval), which will contain the initially buoyant CO₂ under the effects of relative permeability and capillary pressure. Lateral movement of the injected CO₂ will be restricted by residual gas trapping (relative permeability) and solubility trapping (dissolution of the CO₂ into the native formation brine), confining the CO₂ within the

proposed storage reservoir, as identified in Figure 2-3. After the injected CO₂ becomes dissolved in the formation brine, the brine density will increase. This higher-density brine will ultimately sink in the storage formation (convective mixing). Over a much longer period (>100 years), mineralization of the injected CO₂ will ensure long-term, permanent geologic confinement. Injected CO₂ is not expected to adsorb to any of the mineral constituents of the target formation; therefore, this process is not considered to be a viable trapping mechanism in this project. Adsorption of CO₂ is a trapping mechanism notable in the storage of CO₂ in deep unminable coal seams.

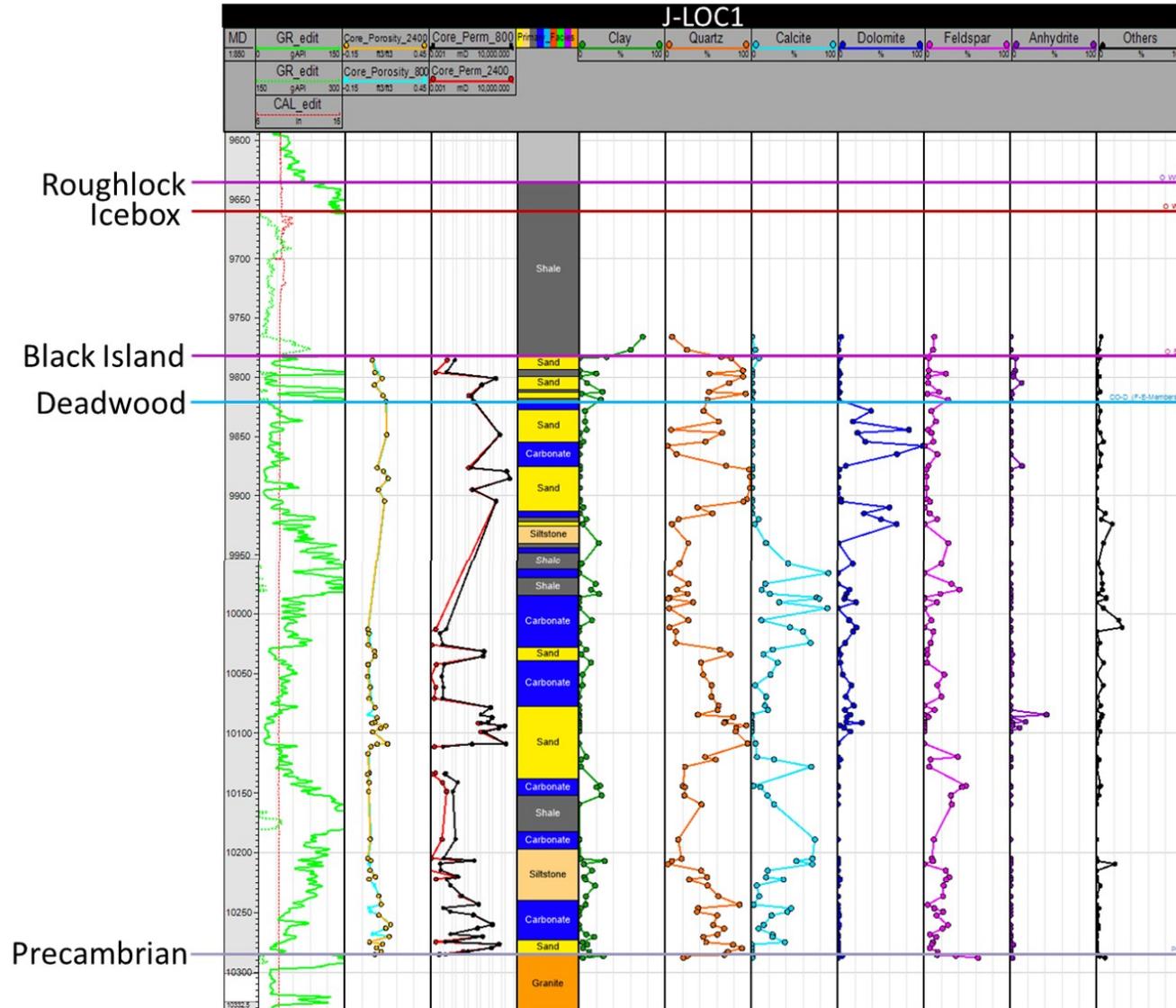


Figure 2-20. Laboratory-derived mineralogical characteristics of the Black Island and Deadwood Formations.

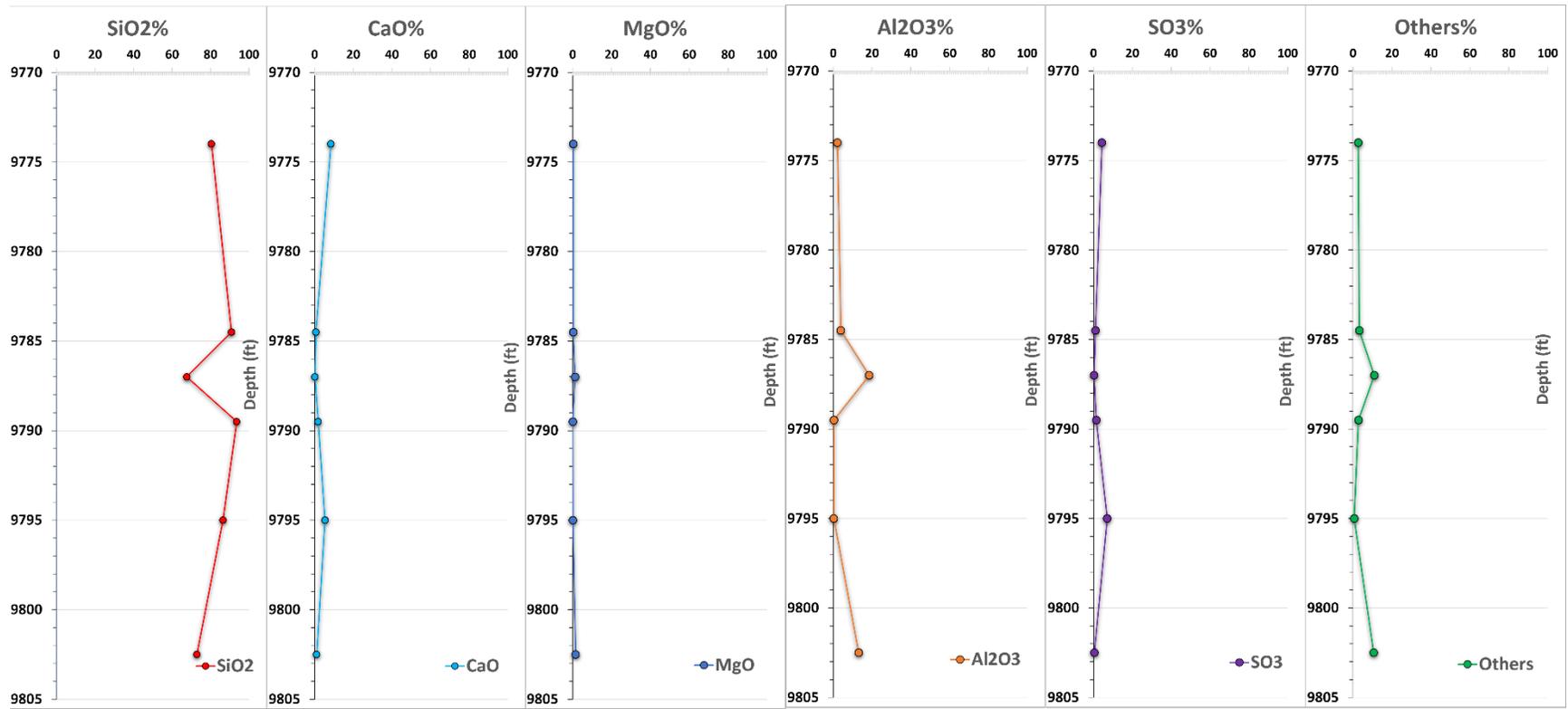


Figure 2-21a. XRF data from the Black Island Formation from J-LOC1.

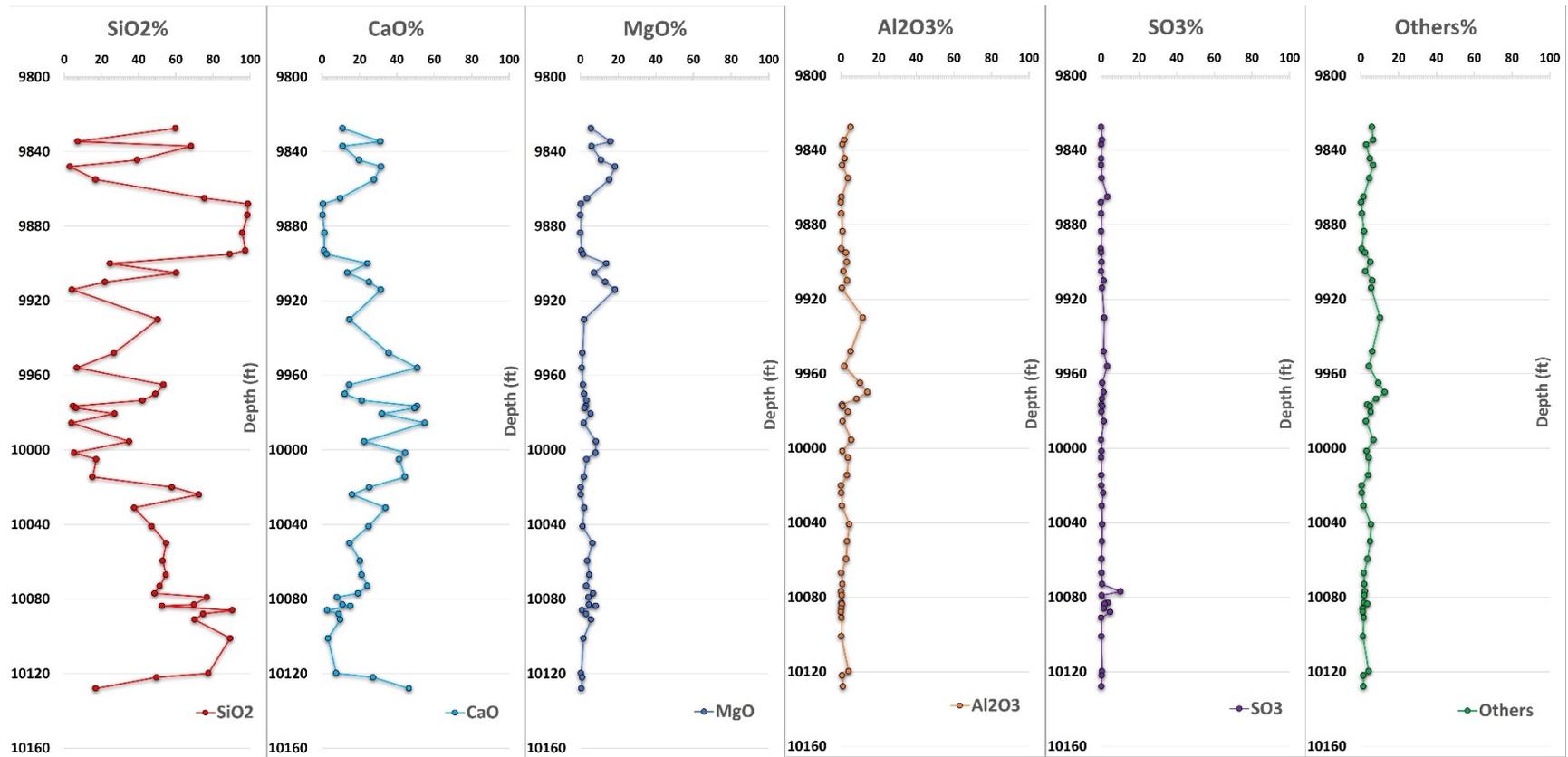


Figure 2-21b. XRF data from the Upper Deadwood Formation, including the C, D, and E members from J-LOC1.

2.3.4 Geochemical Information of Injection Zone

Geochemical simulation has been performed to calculate the effects of introducing the CO₂ stream into the injection zone. The effects have been found to be minor and not threatening to the geologic integrity of the storage system.

The injection zone, the Upper Deadwood sands and Black Island Formation, was investigated using the geochemical analysis option available in the Computer Modelling Group Ltd. (CMG) compositional simulation software package GEM. GEM is also the primary simulation software used for evaluation of the reservoir's dynamic behavior resulting from the expected CO₂ injection. The project's injection scenario was rerun with the geochemical analysis option included, and the differences were compared to the scenario that was run without the geochemical option included. Geochemical alteration effects were seen in the geochemistry case, as described below. However, these effects were not significant enough to cause meaningful change to storage reservoir performance or mechanical properties of the storage formation.

The geochemistry case was constructed using the injection case simulation inputs and assumptions as well as honoring the average mineralogical composition of the Deadwood Formation rock materials (94% of bulk reservoir volume) and average formation brine composition (6% of bulk reservoir volume). XRD data from the JLOC-1 well core samples were used to inform the mineralogical composition of the Deadwood Formation used in the geochemical modeling (Table 2-8). The ionic composition of the formation water is listed in Table 2-9. The injection stream composition remained the same as the injection case simulation, assumed as 100% CO₂. The injection stream is expected to be 99.9% CO₂. The other constituents represent 0.1% in the stream and likely include nitrogen (N₂) and water vapor (H₂O). However, 100% CO₂ was assumed for computational efficiency in the geochemical simulation to investigate rock and fluid interaction in the saline storage formation. N₂ is known to be an inert gas, and water is already in the saline storage formation and will have little to no impact on the geochemical reactions. In the injection stream, argon (Ar) and oxygen vapor (O₂) may also be present but in a negligible amount that would have no impact on geochemical reactions in the storage formation. The geochemistry case was run for the 20-year injection period followed by 94 years of postinjection shutdown and monitoring.

Table 2-8. XRD Results for JLOC-1 Deadwood Formation Core Samples

Mineral Data	Average %
Calcite	25.85
Dolomite	12.78
Quartz	32.94
Illite	4.7
K-Feldspar	8.54
Anhydrite	5.18
Ankerite	3.97
Other	6.04

Table 2-9. Deadwood Formation Water Ionic Composition, expressed as molality

Component	Molality
SO ₄ ²⁻	4.47E-3
K ⁺	0.03995
Na ⁺	3.58711
Ca ²⁺	0.17864
Mg ²⁺	0.02652
Fe ²⁺	3E-04
H ⁺	1.8836E-6
Cl ⁻	4.27731
HCO ₃ ⁻	0.03995
Al ³⁺	1E-05
SiO ₂ (aq)	1.0E-08

Figure 2-22 shows that reservoir performance results for the two cases are slightly different. As a result of geochemical reactions in the reservoir, there is an approximately 8% increase in cumulative injection potential. Wellhead injection pressure is slightly lower for the geochemistry case. Figure 2-23 shows the concentration of CO₂, in molality, in the reservoir after 20 years of injection. The pH of the reservoir brine changes in the vicinity of the CO₂ accumulation, as shown in Figure 2-24. The pH of the Deadwood native brine is 5.7 whereas the fluid pH declines to approximately 4.0 in the CO₂-flooded areas.

Figure 2-25 shows the mass of mineral dissolution and precipitation due to geochemical reactions in the model. Illite is the most prominent dissolution mineral, followed by anhydrite. Illite and anhydrite dissolution slows after Year 2042, the year in which injection ends. K-feldspar dissolves during the injection period but slowly begins to reprecipitate in the near-wellbore areas after injection. Calcite, quartz, and dolomite are the primary precipitation minerals. There is a small amount of net dissolution during the simulation period as somewhat larger quantities of minerals are dissolved rather than precipitated. Slow net dissolution continues after the injection period. Figures 2-26 and 2-27 provide an indication of the change in distribution of the mineral that has experienced the most dissolution (illite) and the mineral that has experienced the most precipitation (calcite), respectively. Considering the apparent net dissolution of minerals in the system, as indicated in Figure 2-25, there is an associated net increase in porosity of the affected area, as shown in Figure 2-28. However, the porosity change is small, less than 0.1% porosity units, equating to a maximum increase in average porosity from 6% to 6.1% after the 20-year injection period.

Results of the simulation show that geochemical processes will be at work in the Deadwood Formation during and after CO₂ injection. Mineral dissolution and some reprecipitation are expected to occur during the simulated time span of 114 years. Fluid pH will decrease in the area of the CO₂ accumulation from 5.7 to approximately 4.0, and there will be a slight net increase in system porosity. However, these changes create relatively small changes in reservoir performance parameters such as injection rate or wellhead injection pressure.

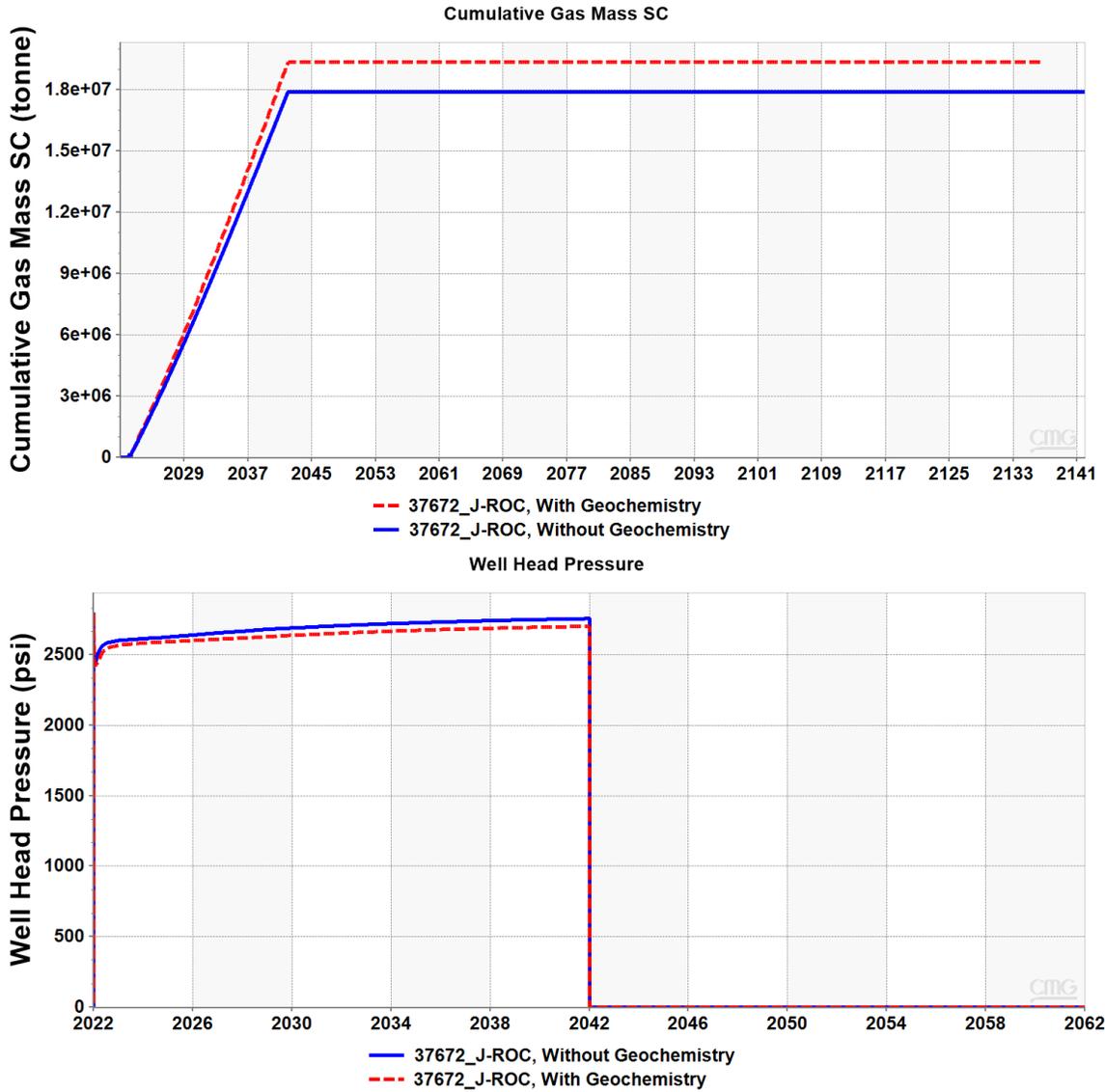


Figure 2-22. The upper graph shows cumulative injection vs. time. There is an increase in injection due to geochemical reactions. The lower graph shows wellhead injection pressure for the geochemistry case is slightly lower than for the injection case without geochemistry.

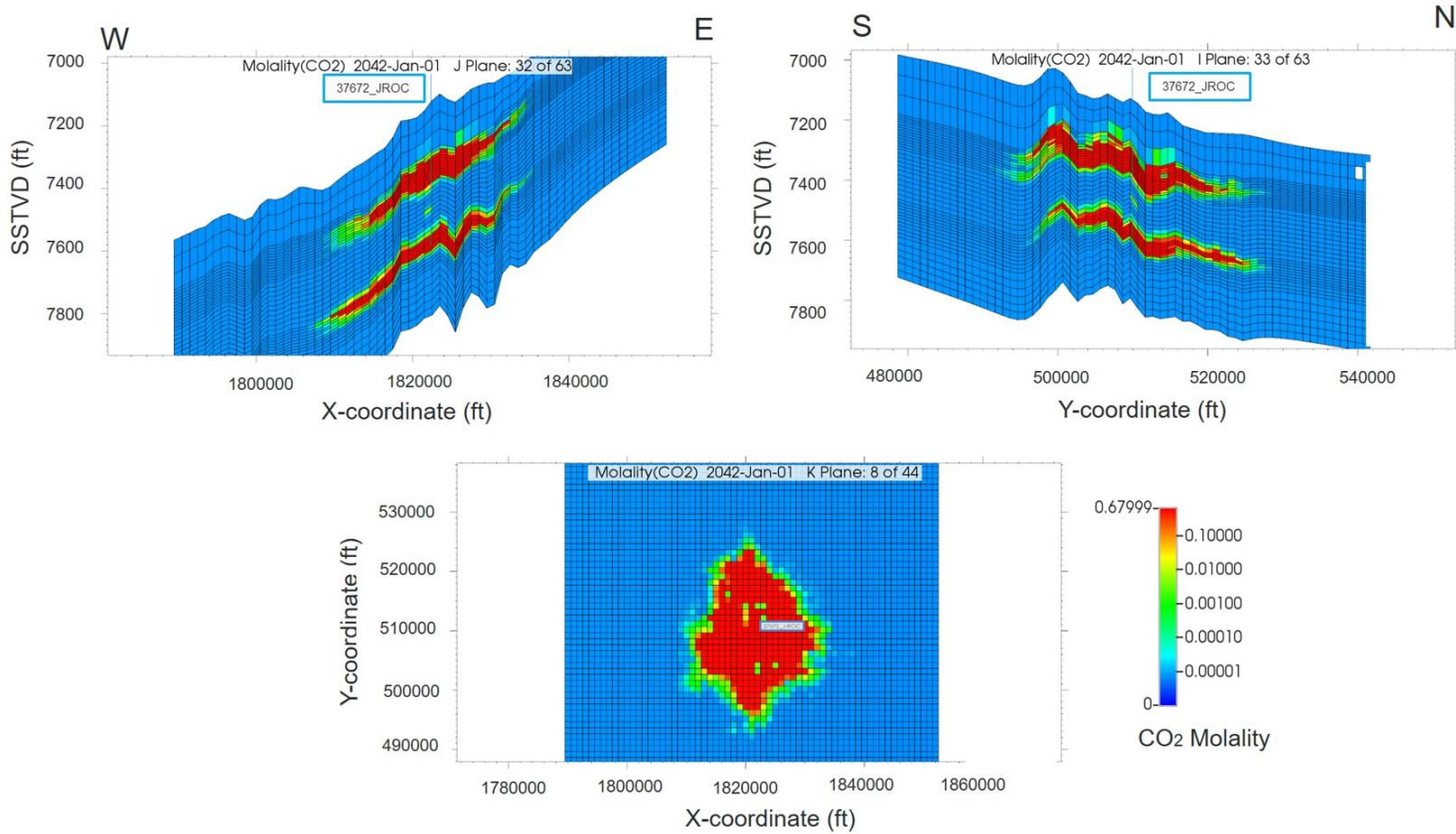


Figure 2-23. Geochemistry case simulation results after 20 years of injection showing the distribution of CO₂ molality. Upper images are west–east and north–south cross sections. Lower image is a planar view of Simulation Layer 8.

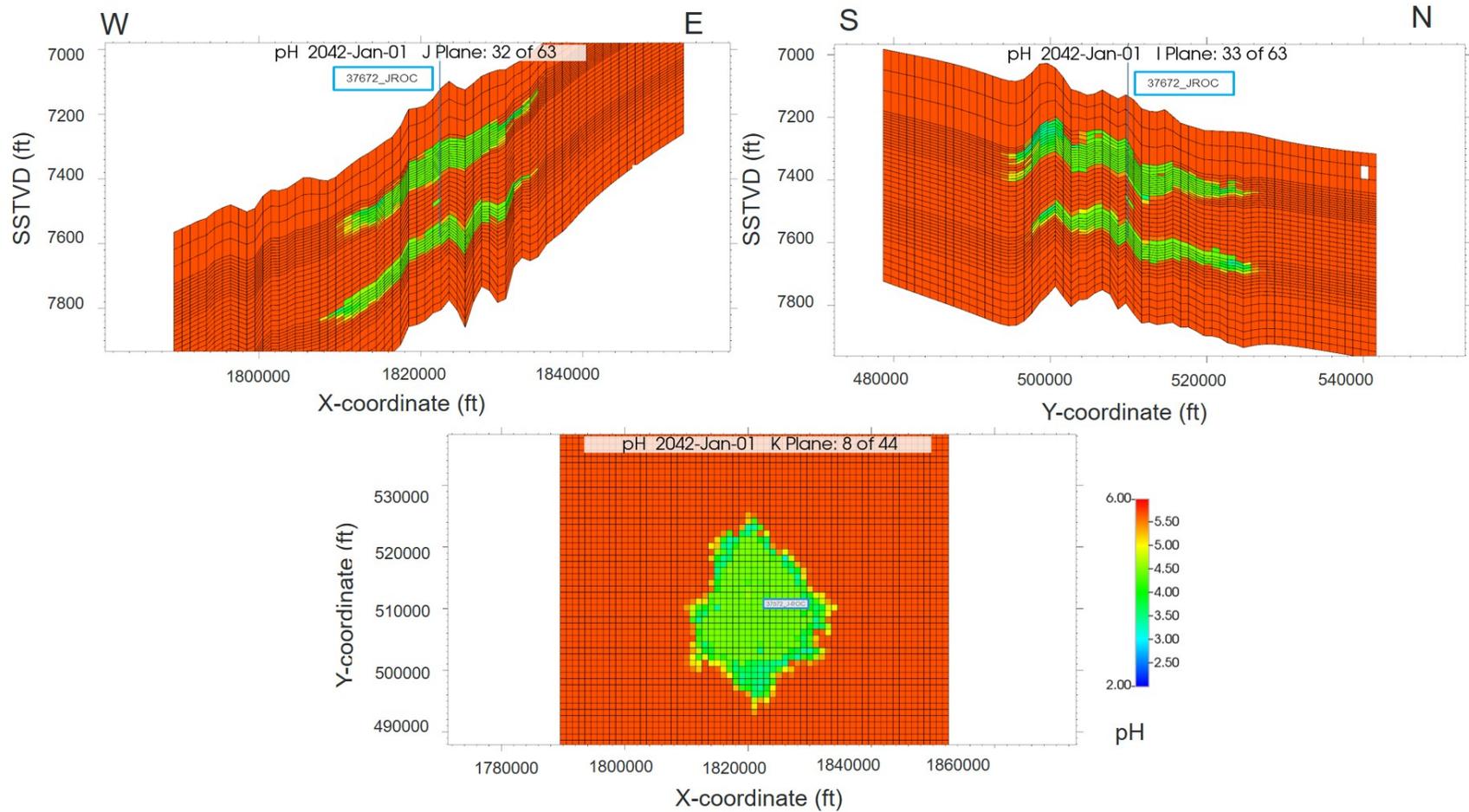


Figure 2-24. Geochemistry case simulation results after 20 years of injection showing the pH of formation brine.

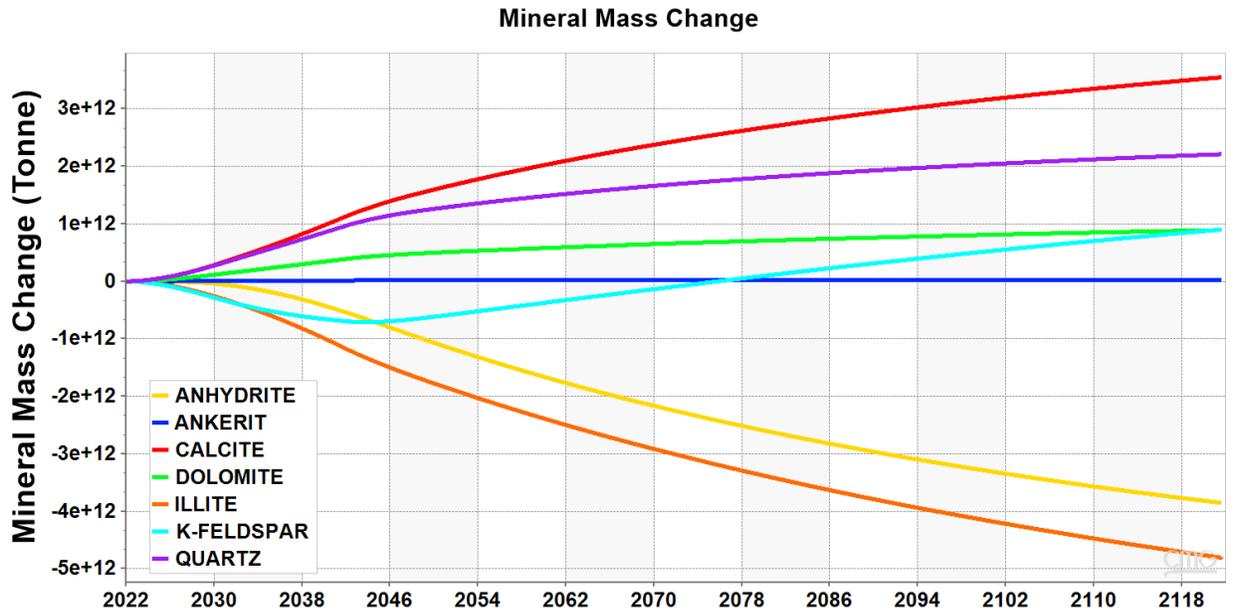


Figure 2-25. Dissolution and precipitation quantities of reservoir minerals due to CO₂ injection. Dissolution of illite and anhydrite with precipitation of calcite, quartz, and dolomite was observed. K-feldspar dissolves during the injection period but slowly begins to reprecipitate after injection.

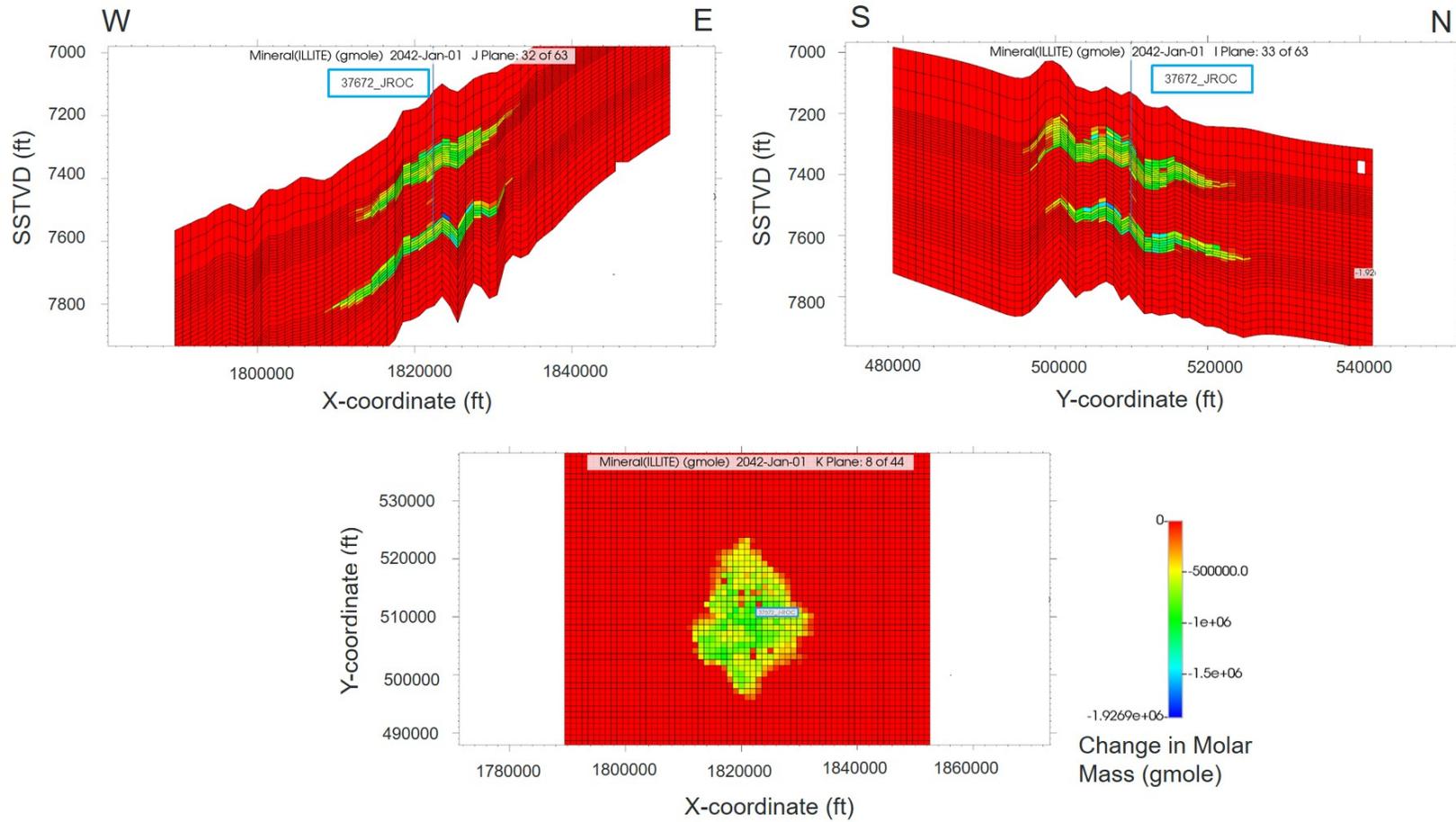


Figure 2-26. Molar distribution of illite, the most prominent dissolved mineral at the end of the injection period, shown in green. Compare to the molar CO₂ distribution in Figure 2-23.

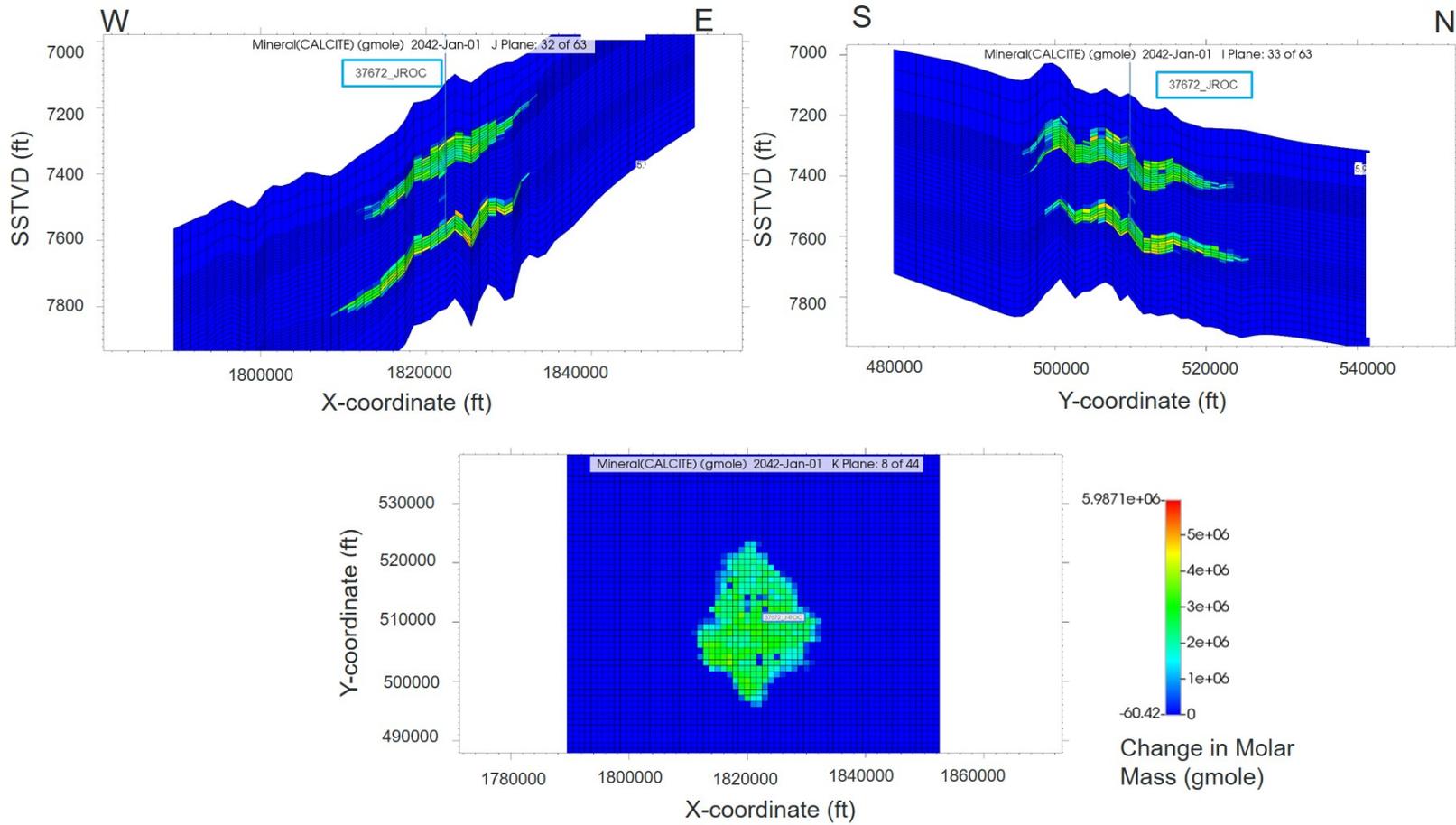


Figure 2-27. Molar distribution of calcite, the most prominent precipitated mineral at the end of the injection period. Compare to the molar CO₂ distribution in Figure 2-23.

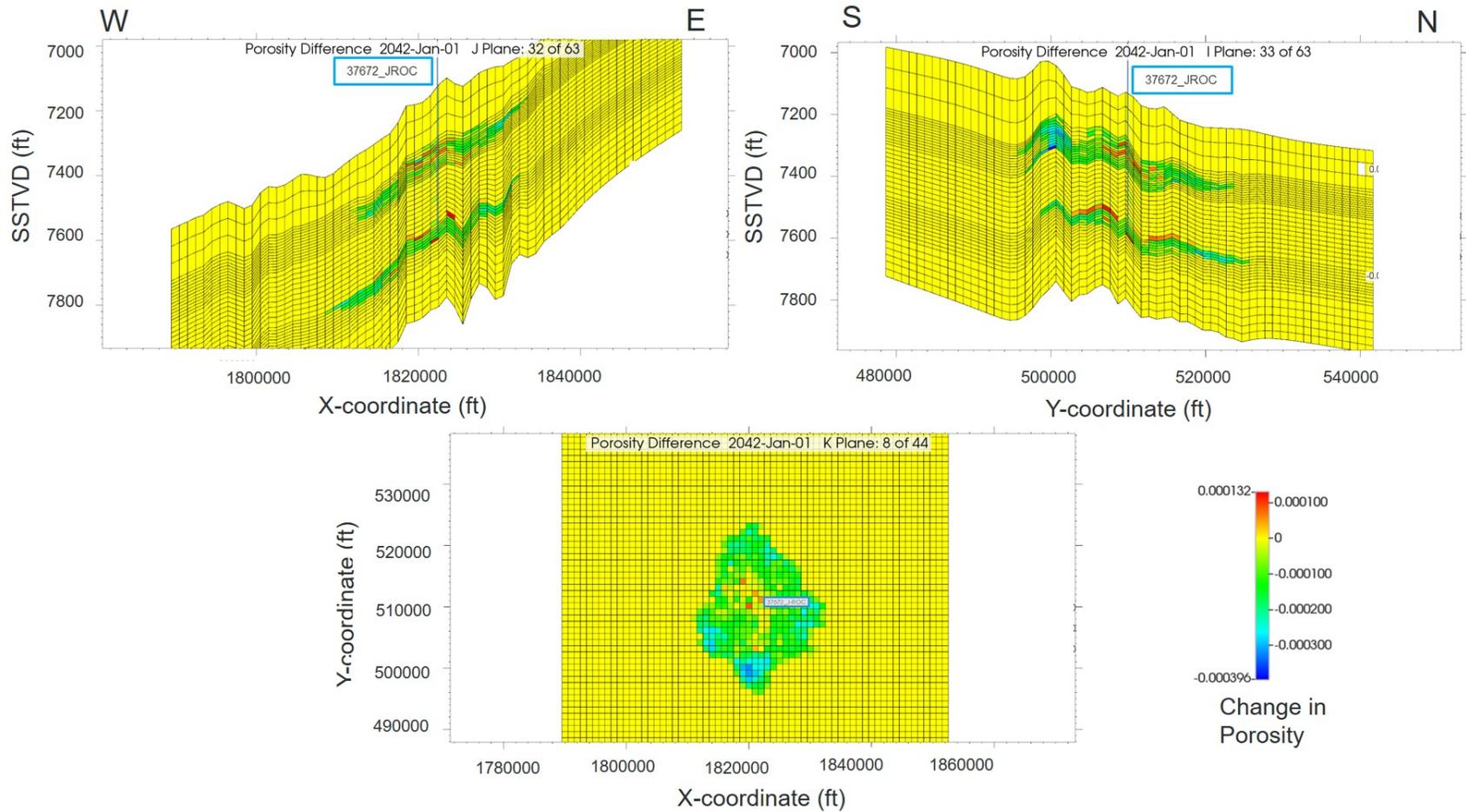


Figure 2-28. Change in porosity due to net geochemical dissolution after the 20-year injection period. Maximum porosity change is less than 0.1%. Compare to the molar CO₂ distribution in Figure 2-22.

2.4 Confining Zones

The confining zones for the Deadwood and Black Island Formations are the overlying Icebox Formation and underlying Deadwood B member shale (Figure 2-3, Table 2-10). All three units, the Icebox Formation, Deadwood B member shale, and Precambrian basement, consist of impermeable rock layers.

Table 2-10. Properties of Upper and Lower Confining Zones at the J-LOC1 Well

Confining Zone Properties	Upper Confining Zone	Lower Confining Zone
Formation Name	Icebox	Deadwood B member shale
Lithology	Shale	Shale
Formation Top Depth, ft	9,308	9,791
Thickness, ft	118	34
Porosity, % (core data)*	3.6***	2.0
Permeability, mD (core data)**	0.00002***	0.0103
Capillary Entry Pressure (CO ₂ /brine), psi	845	176****
Depth Below Lowest Identified USDW, ft	8,097	8,580

* Porosity values are reported as the arithmetic mean followed by the range of values in parentheses.

** Permeability values are reported as the geometric mean followed by the range of values in parentheses.

*** Porosity and permeability values derived from HPMI (high-pressure mercury injection) testing.

**** No shale samples in the Deadwood were tested. Value is for a sample from a sandy-shale interval in the Deadwood D member

2.4.1 Upper Confining Zone

In the Tundra SGS area, the Icebox consists of shale. This upper confining zone is laterally extensive across the project area (Figures 2-29 and 2-30) 9,308 ft below the land surface and 118 ft thick at the Tundra SGS site (Table 2-10 and Figure 2-31). The upper confining zone has sufficient areal extent and integrity to contain the injected CO₂. The upper confining zone is free of transmissive faults and fractures (Section 2.5). The contact between the underlying sandstone of the Black Island Formation is conformable and can be correlated across the project area. The transition from the Icebox to the Black Island is indicated by a relatively low GR, low neutron, high density, and low compressional sonic across the contact (Figure 2-32).

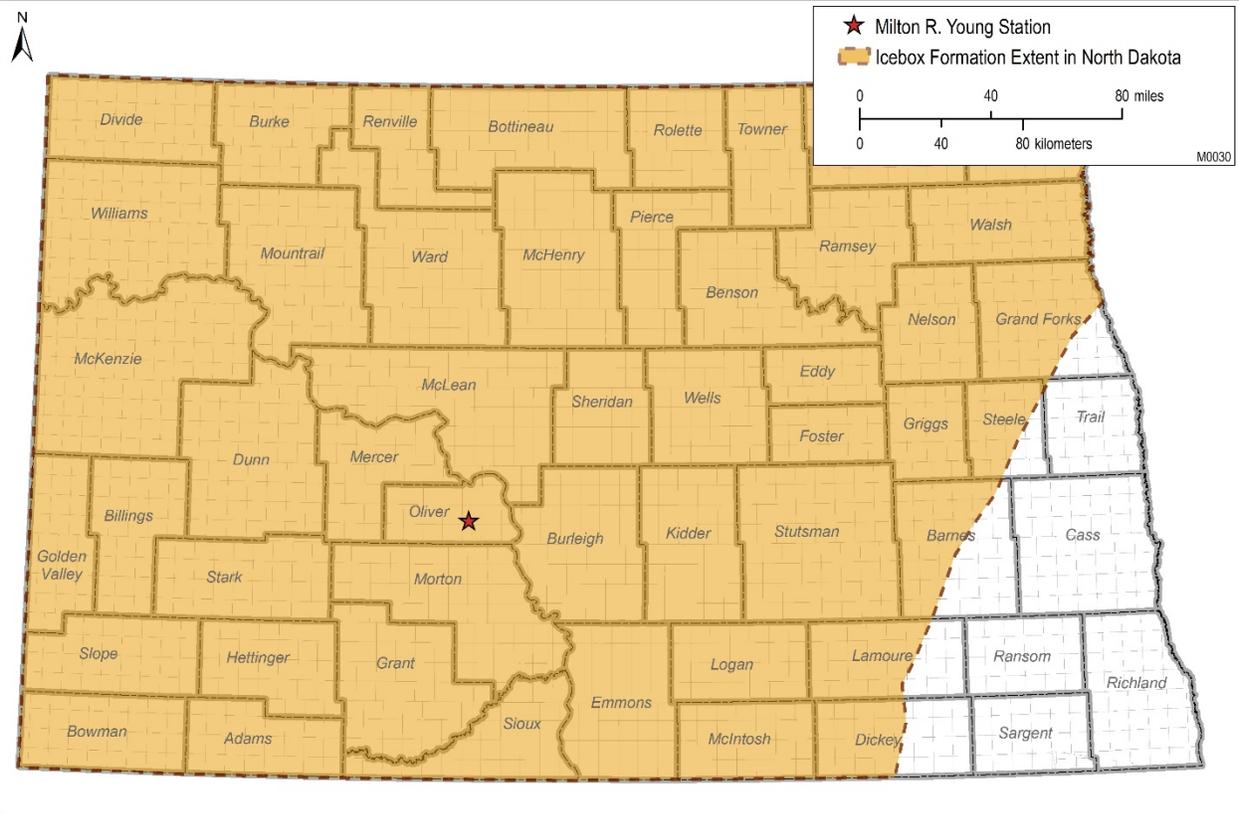


Figure 2-29. Areal extent of the Icebox Formation in western North Dakota (modified from Nesheim, 2012a).

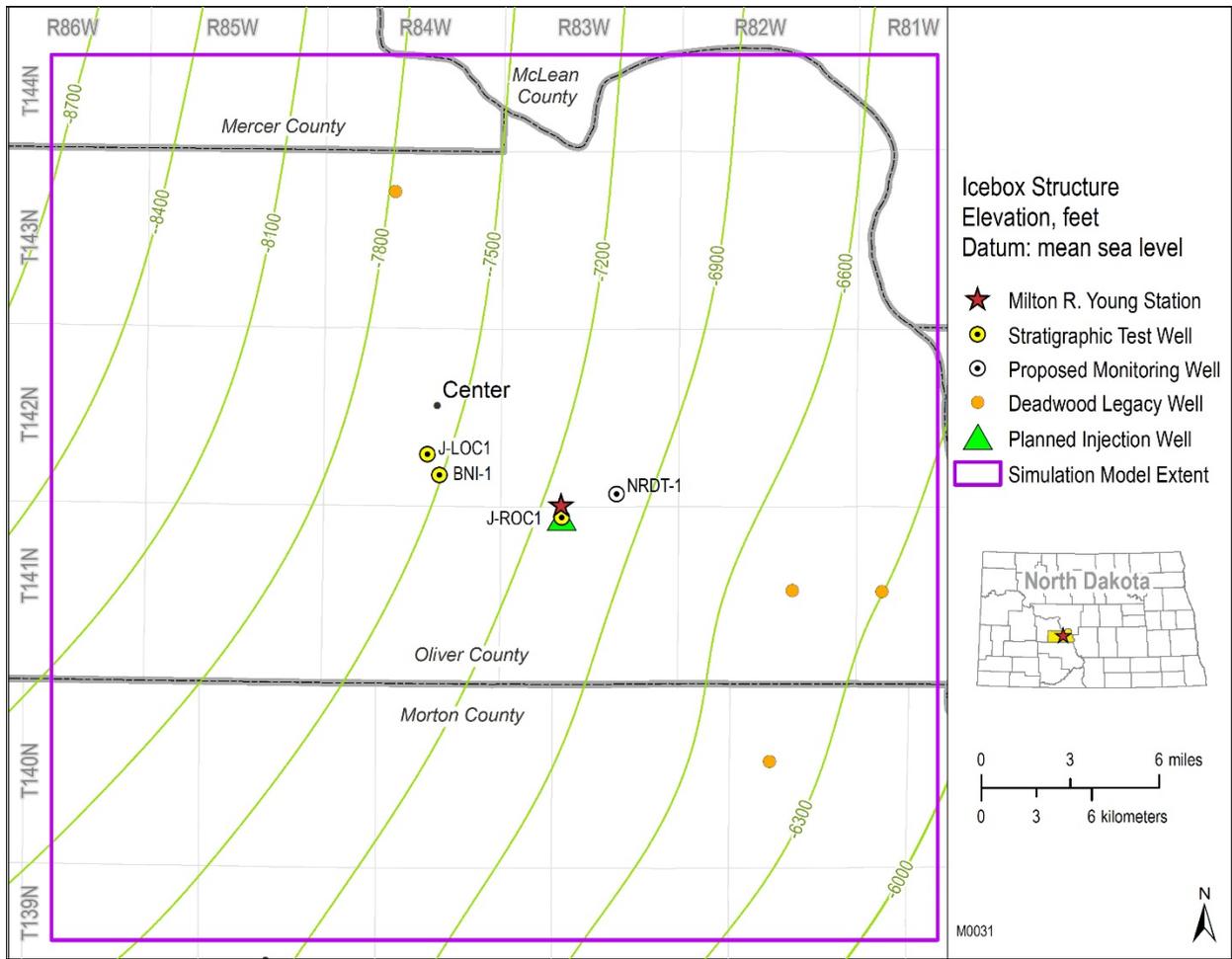


Figure 2-30. Structure map of the upper confining zone across the simulation model extent.

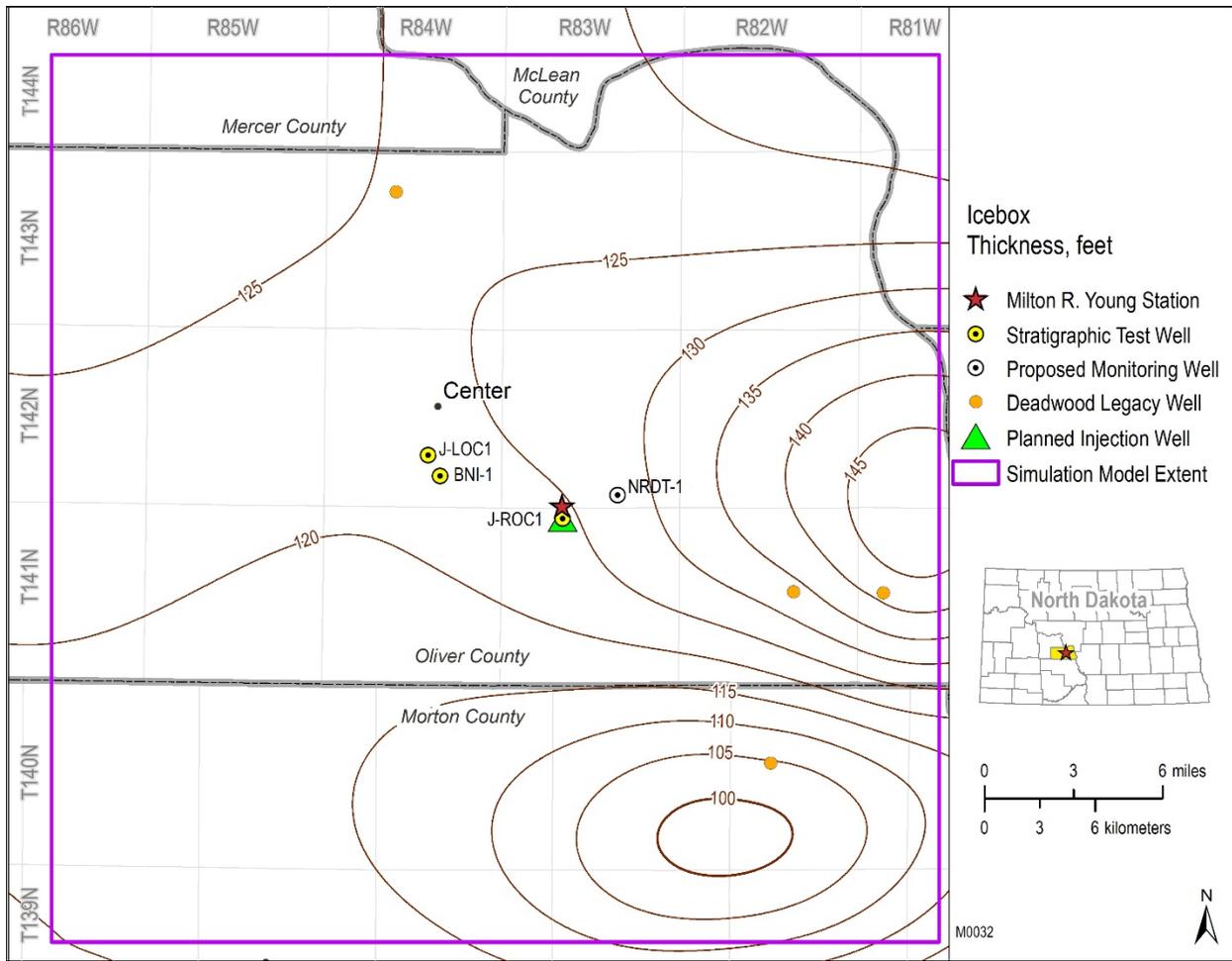


Figure 2-31. Isopach map of the upper confining zone across the simulation model extent.

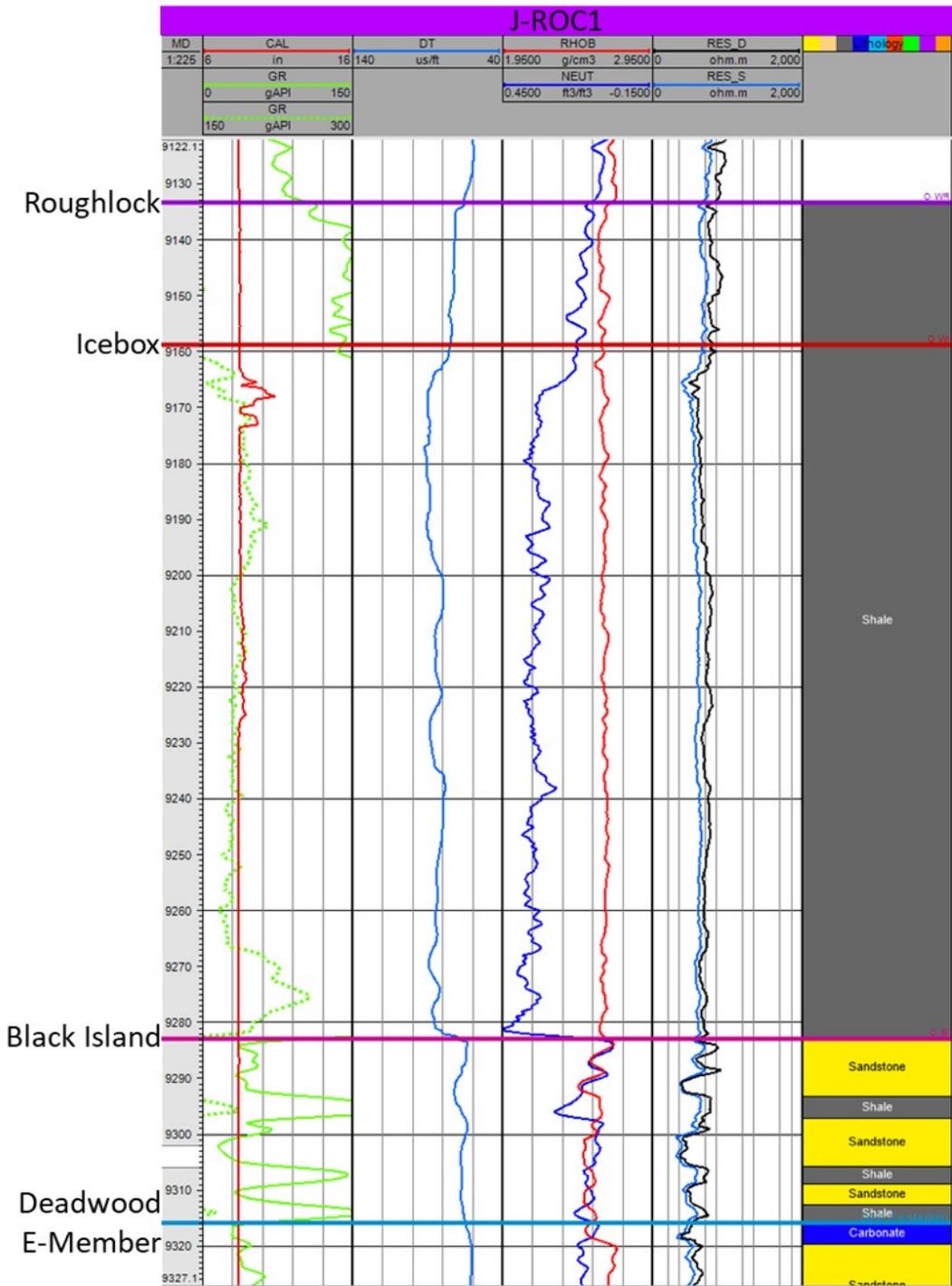


Figure 2-32. Well log display of the upper confining zone at the J-ROC1 well.

Microfracture in situ stress tests were performed using the MDT tool in the J-LOC1 wellbore. Microfracture stress tests were attempted in the J-ROC1 well; however, because of extremely unstable wellbore conditions, the MDT stress tool run was not performed after a near loss of the tool in the wellbore.

For the J-LOC1 well, in the Icebox Formation at 9,749.5 and 9,751.2 ft, the MDT tool was unable to cause a breakdown in the formation with an applied maximum injection pressure of 10,984.9 and 10,867.24 psi, respectively (Figures 2-33 and 2-34). The maximum injection pressure was limited by the dual-packer mechanical specifications having a set maximum differential pressure rating between the upper packer and hydrostatic pressure of 5,500 psi; see Appendix D, “Schlumberger Dual-Packer Module.” The inability to break down the Icebox Formation at the two depths indicated that the formation is very tight competent and exhibits sufficient geologic integrity to contain the injected CO₂ stream.

The Icebox Formation was not suitable to collect competent core samples from the J-LOC1 well core for the purposes of porosity and permeability laboratory tests; the samples would crush in the equipment. The formation was found to be tight, and porosity and permeability estimates were derived from HPMI testing for one sample (Table 2-11). The lithology of the cored sections of the Icebox Formation is primarily shale, with minor pyrite.

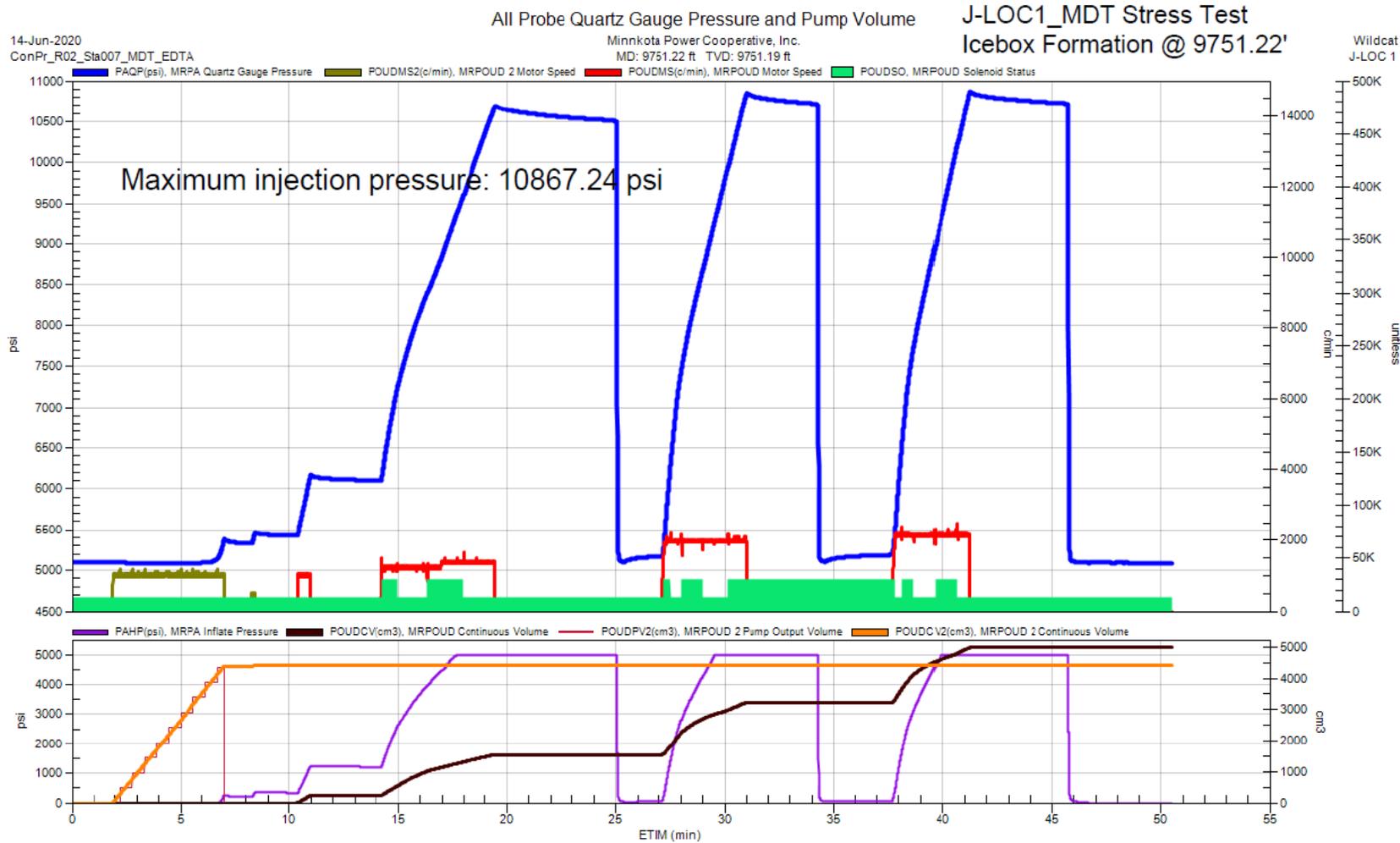


Figure 2-34. J-LOC1 Icebox Formation MDT microfracture in situ stress test pump cycle graph at 9,751.2 ft.

Table 2-11. Icebox Core Sample Porosity and Permeability from J-LOC1

Sample Depth, ft	Porosity, %	Permeability, mD
9,773	–	–
9,767	3.6*	0.000020*
9,756	–	–
Range	3.6*	0.000020*

* Derived from HPMI.

2.4.1.1 Mineralogy

Thin-section investigation shows that the Icebox Formation is primarily shale. Thin sections were created from the base of the Icebox and the shales present in the Black Island Formation. The shales present in the Black Island Formation have characteristics similar to the shales of the Icebox Formation. The mineral components present are clay, quartz, feldspar, and iron oxides. The quartz grains are always surrounded by a clay matrix. The porosity and permeability measurements could not be performed because of the fissility of the rock. The porosity was estimated from HPMI analysis and equaled 3.6%. Log interpretations (Figure 2-31) and visual inspection of the collected core validate consistent mineral assemblage within the Icebox and Black Island Formations.

XRD data from the J-LOC1 well core supported facies interpretations from core descriptions and thin-section analysis. The Icebox Formation comprises clay, quartz, feldspar, and iron oxides.

XRF analysis of the Icebox Formation identified the major chemical constituents to be dominated by SiO₂ (53%), SO₃ (1.6%), CaO (0.26%), Al₂O₃ (24%), and MgO (1.9%), correlating well with the silicate- and aluminum-rich mineralogy determined by XRD (Table 2-12). This correlates with XRD, core description, and thin-section analysis.

Table 2-12. XRF Data for the Icebox Formation from the J-LOC1 Well

Sample Depth			
9,756 ft		9,767 ft	
Component	Percentage	Component	Percentage
SiO ₂	50.51	SiO ₂	57.01
Al ₂ O ₃	26.11	Al ₂ O ₃	22.55
SO ₃	3.03	SO ₃	0.30
CaO	0.16	CaO	0.36
MgO	1.83	MgO	1.97
Other	15.89	Other	15.18

2.4.1.2 Geochemical Interaction, Icebox Formation

Geochemical simulation using PHREEQC geochemical software was performed to calculate the potential effects of injected CO₂ on the Icebox Formation, the primary confining zone for the Deadwood Formation. A vertically oriented 1D simulation was created using a stack of 1-meter grid cells where the formation was exposed to CO₂ at the bottom boundary of the simulation and allowed to enter the system by molecular diffusion processes. The results were calculated at grid cell centers located at 0.5, 1.5, and 2.5 meters above the cap rock–CO₂ exposure boundary. The mineralogical composition of the Icebox was honored (Table 2-13). The formation brine composition was assumed to be the same as the known composition from the Deadwood injection zone below (Table 2-14). The injection stream composition was as described by Minnkota Power Cooperative (Minnkota) (Table 2-15). Three different exposure levels, expressed in moles per year, of the CO₂ stream to the cap rock (1.15, 2.3, and 4.5 moles/yr) were used. These values are considerably higher than the expected actual exposure levels. This overestimate was done to ensure that the degree and pace of geochemical change would not be underestimated. These three simulations were run for 45 years to represent 20 years of injection plus 25 years postinjection. The simulations were performed at reservoir pressure and temperature conditions.

Table 2-13. Mineral Composition of the Icebox Formation Derived from XRD Analysis of JLOC-1 Core Samples (9773 ft MD)

Minerals, wt%	
Illite	18.2
Kaolinite	5.7
Chlorite	4.2
Montmorillonite	3.1
K-Feldspar	8.1
Quartz	59.3
Calcite	0.6
Pyrite	0.8

Table 2-14. Formation Water Chemistry from Deadwood Formation Fluid Samples from JLOC-1

pH	6	Total Dissolved Solids	256,000 mg/L
Total Alkalinity	72 mg/L CaCO ₃	Calcium	8,610 mg/L
Bicarbonate	72 mg/L CaCO ₃	Magnesium	1,210 mg/L
Carbonate	<20 mg/L CaCO ₃	Sodium	87,000 mg/L
Hydroxide	<20 mg/L CaCO ₃	Potassium	2020 mg/L
Total Organic Carbon	14 mg/L	Iron	22.2 mg/L
Sulfate	491 mg/L	Manganese	2.85 mg/L
Chloride	17,500 mg/L	Barium	<5 mg/L
Nitrate	<0.1 mg/L	Strontium	0.32 mg/L

Table 2-15. Injection Stream Composition

Component Flows	ppmv	mol%
CO ₂	804,195	0.999
H ₂ O	632	7.85E-04
N ₂	163	2.02E-04
O ₂	6	7.45E-06
H ₂	0	0.00E+00
Ar	4	4.97E-06

The results showed relatively minor geochemical processes at work. Figures 2-35, 2-36, and 2-37 show results from the most extreme exposure case. Figure 2-35 shows change in fluid pH over time as CO₂ enters the system. For the cell at the CO₂ interface, C1, the pH declines to and stabilizes at a level of 4.9. For the cell occupying the space 1 to 2 meters into the cap rock, C2, the pH only begins to change after Year 8. The pH is unaffected in Cell C3. Figure 2-36 shows change in mineral dissolution and precipitation in grams per cubic meter of rock. Dashed lines are for Cell C1, solid lines that are seen in the figure are from Cell C2, 1.0 to 2.0 meters into the cap rock. Any effects in Cell C3 are too small to represent at this scale. In Cell C1, K-feldspar is the primary dissolution mineral, which is primarily replaced by precipitation of illite, quartz, and montmorillonite. Similar, but lesser, effects are seen in Cell C2. Figure 2-37 shows change in porosity of the Icebox cap rock. During an initial model stabilization period, Cell C1 experiences an increase in porosity due to K-feldspar dissolution. However, the porosity gradually returns to its initial condition by Year 10. As the porosity scale shows, these changes are small, less than 0.0013 porosity units. Cells C2 and C3 experience no significant change in porosity during the 45 years of the simulation. The small net porosity changes from dissolution and precipitation in Cells C1 and C2, with essentially zero observed effect on Cell C3, suggest that geochemical change from exposure to CO₂ is very minor and will not cause substantive deterioration of the Icebox cap rock.

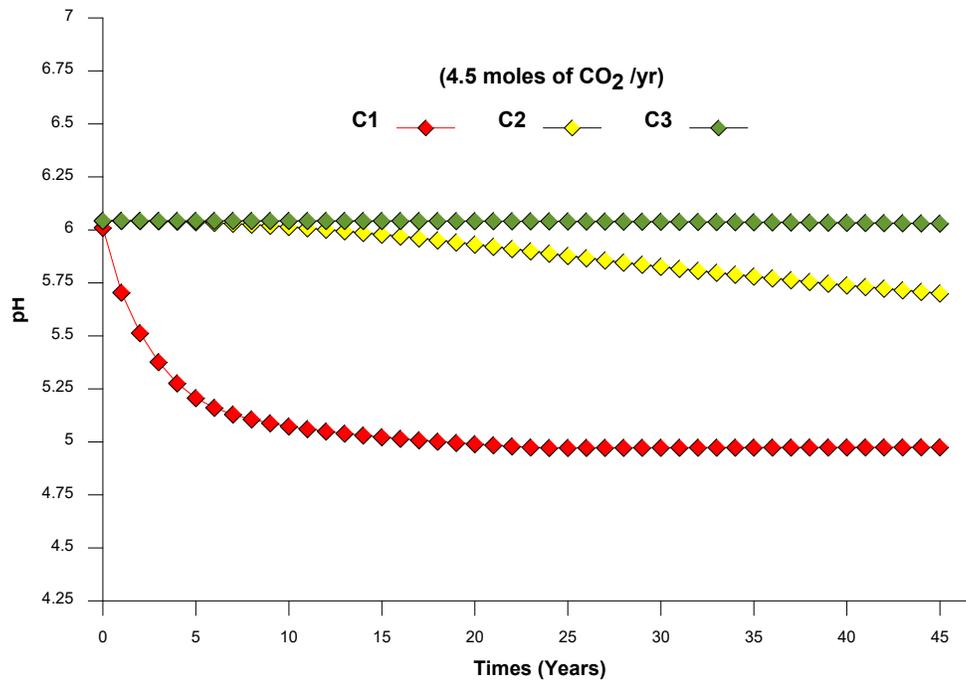


Figure 2-35. Change in fluid pH vs. time. Red line shows pH for the center of Cell C1 at 0.5 meters above the base of the Icebox cap rock. Yellow line shows Cell C2 at 1.5 meters above the cap rock base. Green line shows Cell C3 at 2.5 meters above the cap rock base.

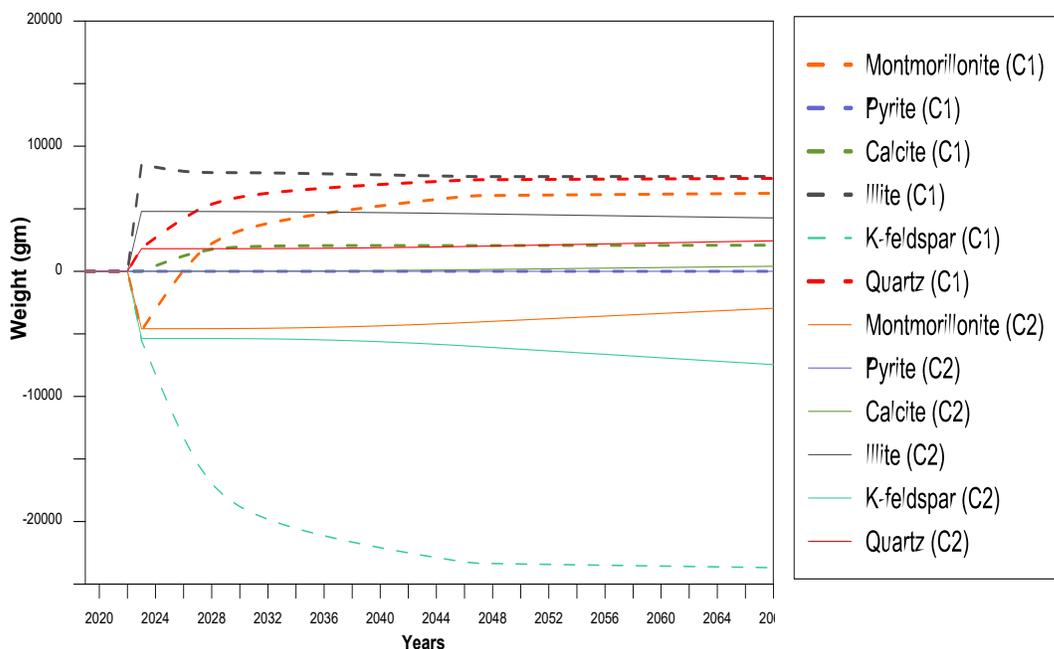


Figure 2-36. Dissolution and precipitation of minerals in the Icebox cap rock. Dashed lines show results calculated for Cell C1 at 0.5 meters above the cap rock base. Solid lines show results for Cell C2 at 1.5 meters above the cap rock base. Results from Cell C3 at 2.5 meters above the cap rock base are not shown as they are too small to be seen at this scale.

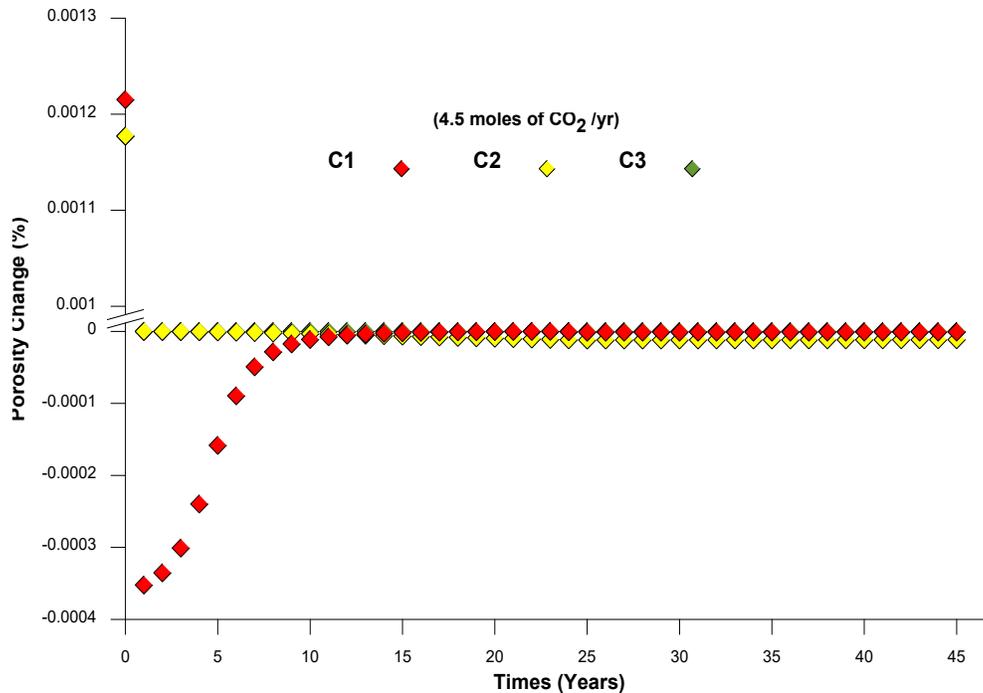


Figure 2-37. Change in percent porosity of the Icebox cap rock. Red line shows porosity change calculated for Cell C1 at 0.5 meters above the cap rock base. Yellow line shows Cell C2 at 1.5 meters above the cap rock base. Green line shows Cell C3 at 2.5 meters above the cap rock base. Long-term change in porosity is minimal.

2.4.2 Additional Overlying Confining Zones

Several other formations provide additional confinement above the Icebox. Impermeable rocks above the primary seal include the Roughlock Formation and the Red River D member, which make up the first additional group of confining formations (Table 2-16). Together with the Icebox, these formations are 612 ft thick and will isolate the Deadwood/Black Island Formations fluids from migrating upward into the next permeable interval, the Red River A, B, and C members (see Figure 2-38). Above the Red River Formation, >1,000 ft of impermeable rocks act as an additional seal between the Red River and Broom Creek, the next proposed storage complex, 876 ft of impermeable rocks separate the Broom Creek from the Inyan Kara and an additional 2,545 ft of impermeable rocks separates the Inyan Kara and the lowermost USDW, the Fox Hills Formation (see Figure 2-39). Confining layers above the Inyan Kara include the Skull Creek, Newcastle, Mowry, Greenhorn, and Pierre Formations (Table 2-16).

No known transmissible faults are within these confining systems in the project area. These formations between the Deadwood, Broom Creek, and Inyan Kara and between the Inyan Kara and lowest USDW have demonstrated the ability to prevent the vertical migration of fluids throughout geologic time and are recognized as impermeable flow barriers in the Williston Basin (Downey, 1986; Downey and Dinwiddie, 1988).

Table 2-16. Description of Zones of Confinement above the Immediate Upper Confining Zone (data based on the J-ROC1 well)

Name of Formation	Lithology	Formation Top Depth, ft	Thickness, ft	Depth below Lowest Identified USDW, ft
Pierre	Shale	1,150	1862	0
Greenhorn	Shale	3,012	391	1,862
Mowry	Shale	3,403	56	2,253
Skull Creek	Shale	3,458	235	2,308
Swift	Shale	3,864	473	2,714
Rierdon	Shale	4,337	147	3,187
Piper (Kline member)	Limestone	4,484	110	3,334
Piper (Picard)	Shale	4,594	91	3,444
Opeche	Shale/mudstone	4,685	55	3,535
Amsden	Dolostone/anhydrite	4,974	247	3,824
Kibbey Lime	Limestone	5,384	31	4,234
Charles	Limestone/anhydrite	5,526	147	4,376
Bakken	Shale	6,926	10	5,776
Birdbear	Limestone	7,075	74	5,925
Duperow	Limestone/dolostone	7,149	272	5,999
Souris River	Dolostone/limestone	7,421	175	6,271
Dawson Bay	Dolostone	7,596	729	6,446
Gunton	Dolostone/limestone	8,325	39	7,175
Stoughton	Shale/limestone	8,364	91	7,214
Lower Red River	Limestone	8,645	488	7,495
Roughlock	Shale/limestone	9,133	25	7,983

Carbonates of the Red River A, B, and C members comprise the first unit with relatively high porosity and permeability above the injection zone and primary sealing formation. The Red River represents the most likely candidate to act as an overlying pressure dissipation zone. The depth to the Red River Formation in the project area is approximately 8,438 ft, and the formation itself is about 450 ft thick. In the unlikely event of out-of-zone migration through the primary and secondary sealing formations, CO₂ would become trapped in the Red River Formation.

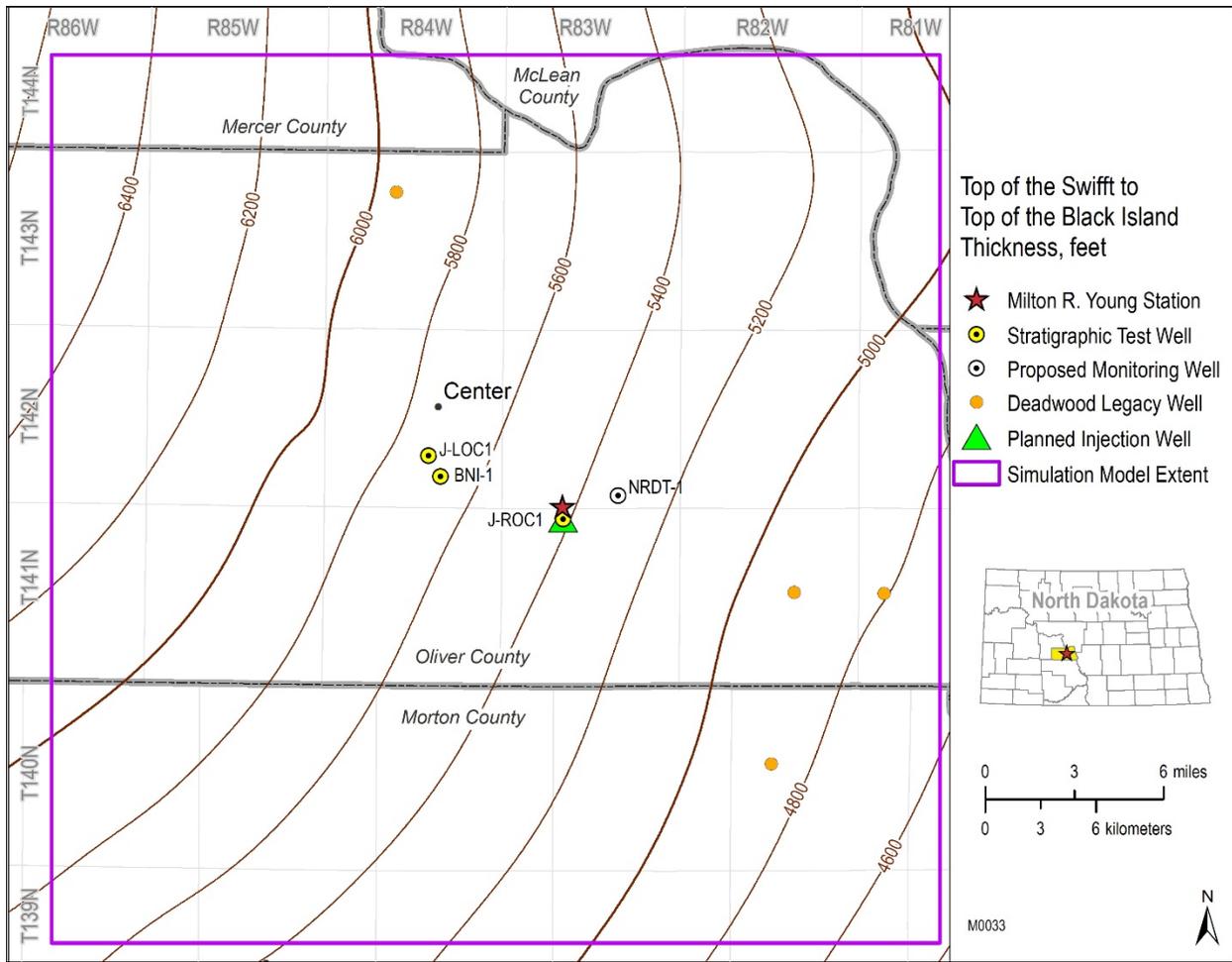


Figure 2-38. Isopach map of the interval between the top of the Black Island Formation and the top of the Swift Formation. This interval represents the primary and secondary confinement zones.

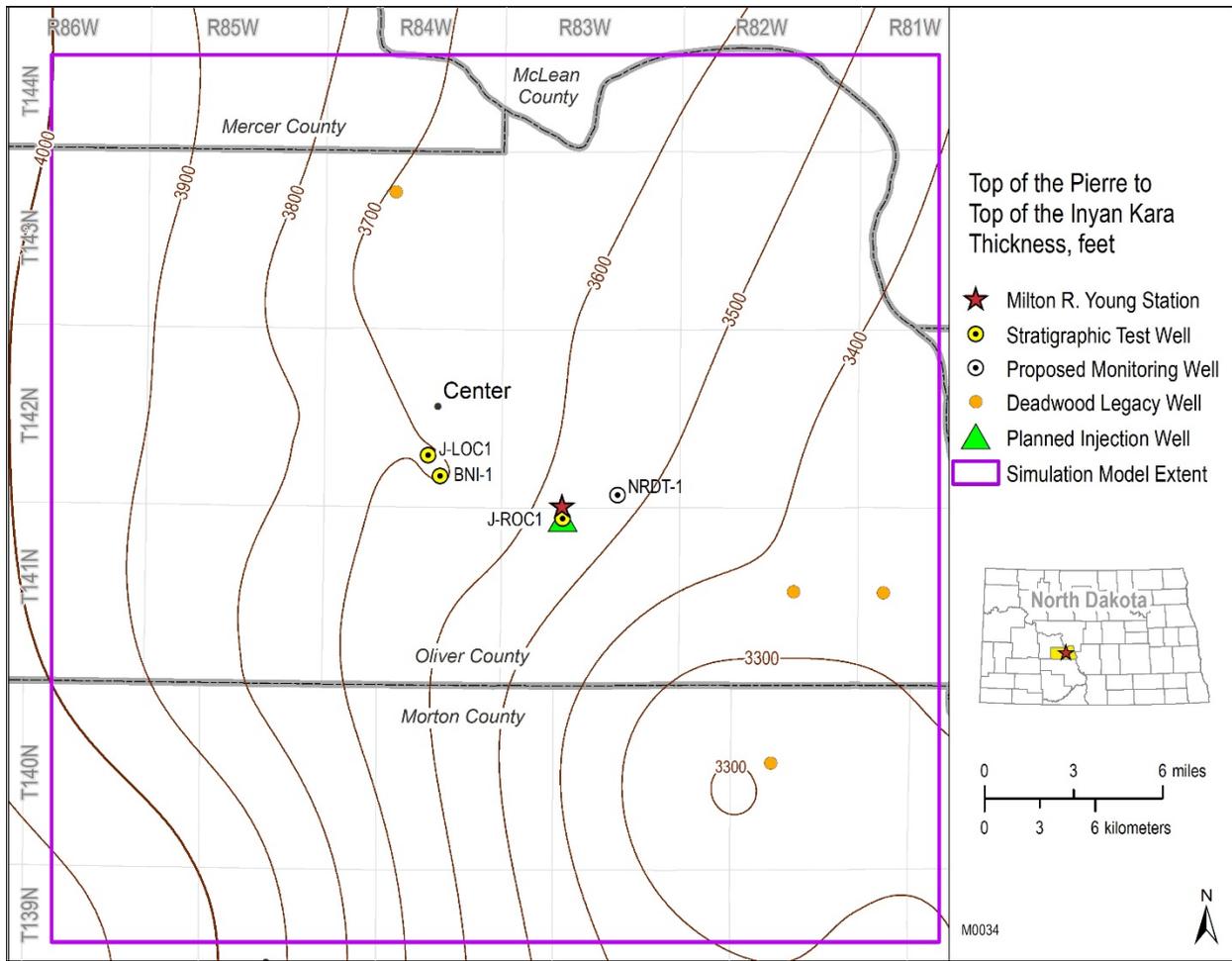


Figure 2-39. Isopach map of the interval between the top of the Inyan Kara Formation and the top of the Pierre Formation. This interval represents the tertiary confinement zone.

2.4.3 Lower Confining Zone

The lower confining zone of the storage complex is the Deadwood B member shale. The Deadwood B member shale consists predominantly of shale with a consistent and correlative package of higher GR, moderate resistivity, higher neutron, moderate density, and high compressional sonic across the project area. The shale within the Deadwood B member is 9,791 ft below the surface and 34 ft thick at the Tundra SGS site (Figures 2-40 and 2-41, Table 2-10).

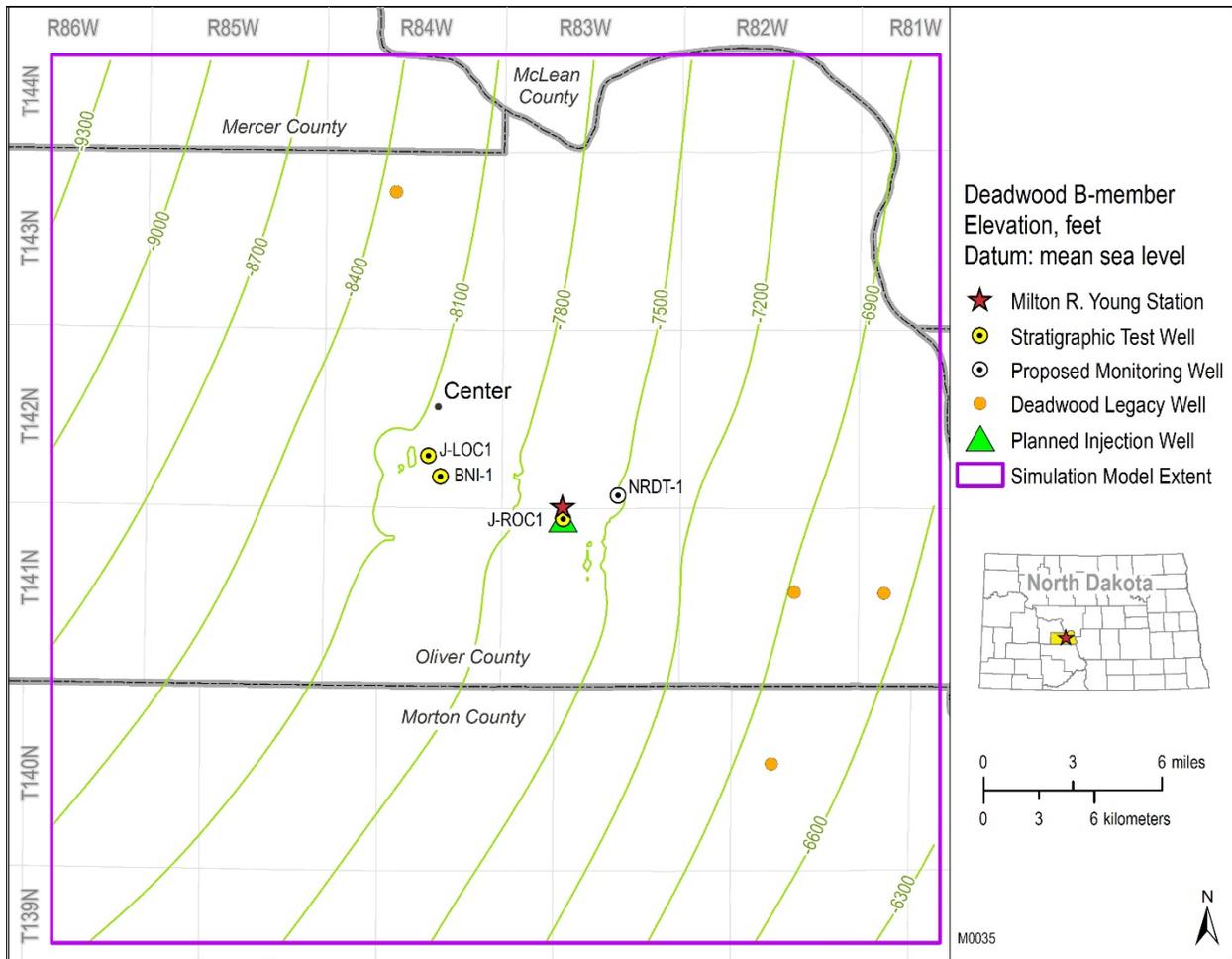


Figure 2-40. Structure map of the Deadwood B member shale across the greater Tundra SGS area.

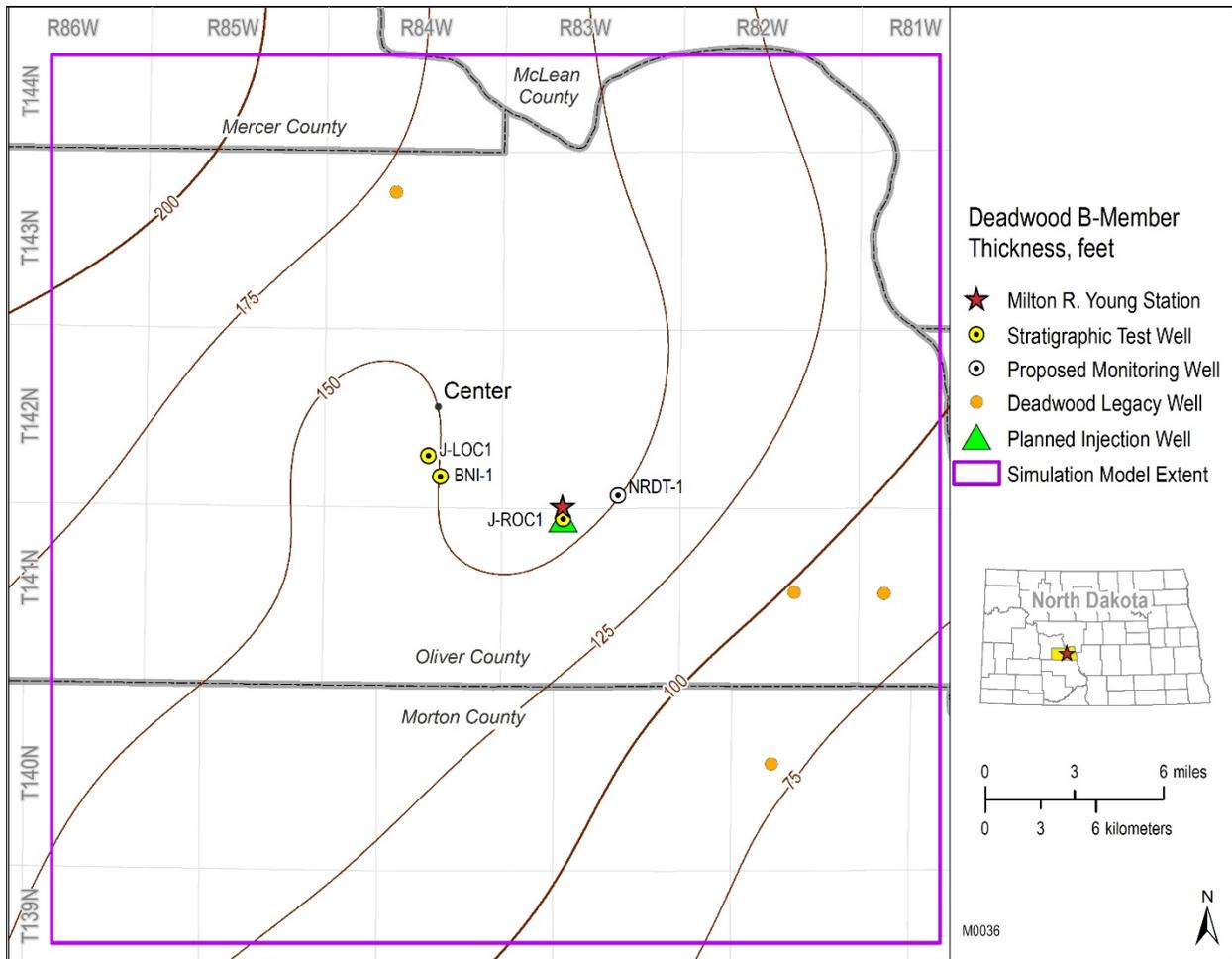


Figure 2-41. Isopach map of the Deadwood B member shale across the Tundra SGS area.

At 144 ft below the top of the Deadwood C-sand is an 80-ft-thick shaly layer of the Deadwood B member. Data acquired from the core plug samples taken from the Deadwood B member show porosity values ranging from 1.55% to 2.63% and permeability values from 0.0083 to 0.0177 mD (Table 2-17).

Table 2-17. Deadwood B Member Shale Core Sample Porosity and Permeability from J-LOC1

Sample Depth, ft	Porosity, %	Permeability, mD
10,152	1.84	0.0083
10,159.5	1.55	0.0177
10,181.5	2.63	0.0076
Range	1.55–2.63	0.0083–0.0177

2.4.3.1 *Mineralogy*

Thin-section analysis and well logs show that the Deadwood B interval comprises carbonates and shale facies. The carbonates are composed mainly of calcite minerals and fossils and then by feldspar and quartz. The Deadwood B shows a tight formation characteristic where the permeability ranges from 0.0094 and 3.18 mD and porosity ranges from 1% to 8%.

XRD was performed, and the results confirm the observations made during core analyses and thin-section description.

XRF data show the Deadwood B shale is mainly composed of CaO (35%), SiO₂ (30%), and Al₂O₃ (4%) (Table 2-18).

Table 2-18. XRF Data for the Deadwood B Shale from the J-LOC1 Well

Sample Depth			
10,159.5 ft		10,181.5 ft	
Component	Percentage	Component	Percentage
SiO ₂	45.18	SiO ₂	15.66
Al ₂ O ₃	5.08	Al ₂ O ₃	2.20
MgO	0.39	MgO	0.79
CaO	25.61	CaO	45.24
SO ₃	0.75	SO ₃	0.18
Other	5.40	Other	3.58

2.4.3.2 *Geochemical Interaction, Deadwood B Shale*

The Deadwood C-sand’s underlying confining layer, the Deadwood B, was investigated using PHREEQC geochemical software. A vertically oriented 1D simulation was created using a stack of five cells, each cell 1 meter in thickness. The formation was exposed to CO₂ at the top boundary of the simulation and allowed to enter the system by advection and dispersion processes. The results were calculated at the center of each cell below the confining layer–CO₂ exposure boundary. The mineralogical composition of the Deadwood B was honored (Table 2-19). Formation brine composition was assumed the same as the known composition from the Deadwood sand injection zone above (previously shown in Table 2-14). The injection stream composition was as described by Minnkota (Table 2-15). The Deadwood B Formation temperature and pressure were adjusted from the Deadwood sand reservoir temperature and pressure conditions, 188°F and 4,357 psi, respectively. Two different pressure levels, 4,357 and 4,652 psi, were applied to the CO₂-saturated brine at the base of the Deadwood sand. These values represent the initial and potential pore pressure levels. The higher-pressure results are shown here to represent a potentially more rapid pace of geochemical change. These simulations were run for 45 years to represent 20 years of injection plus 25 years postinjection.

Table 2-19. Mineral Composition of the Deadwood B Shale, derived from XRD analysis of JLOC-1 core samples Deadwood B Shale (10, 144 ft)

Minerals, wt%	
Illite/Muscovite	10.7
Glauconite	5.2
Clintonite	4.8
K-Feldspar	48.5
Quartz	20.2
Calcite	2.4
Chlorite	1.5
Kaolinite	1.3
Other	5.4

The results showed geochemical processes at work. Figures 2-42, 2-43, 2-44, and 2-45 show findings from the high-pressure, more extreme exposure case. Figure 2-42 shows change in fluid pH over 45 years of simulation time as CO₂ enters the system. Initial change in pH in all the cells from 6 to 5.8 is related to initial equilibration of the model. For the cell at the CO₂ interface, C1, the pH declines from its initial level of 6.0 to 5.3 after 4 years of injection and slowly declines further to 4.4 after the 25-year postinjection period. Similar, but progressively slower, pH change occurs for each cell that is more distant from the CO₂ interface. The pH for Cells 10–19 did not decline over the 45 years of simulation time. Figure 2-43 shows that CO₂ does not penetrate more than 9 meters (represented by Cell C9) within the 45 years simulated.

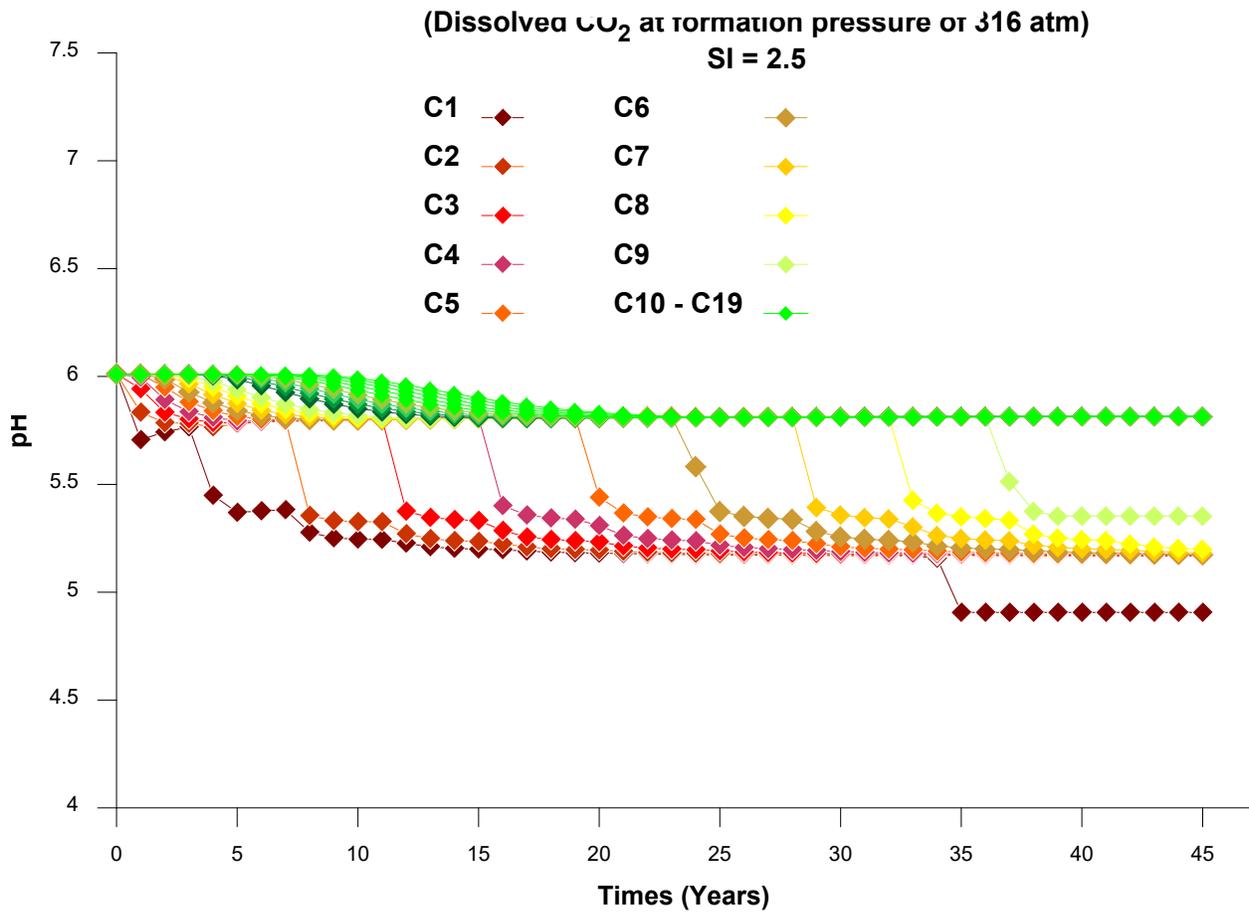


Figure 2-42. Change in fluid pH in the Deadwood B shale underlying confining layer. The red line shows the pH calculated at the center of Cell C1 at 0.5 meters below the Deadwood B top. The green line shows Cell C5 at 4.5 meters below the Deadwood B top.

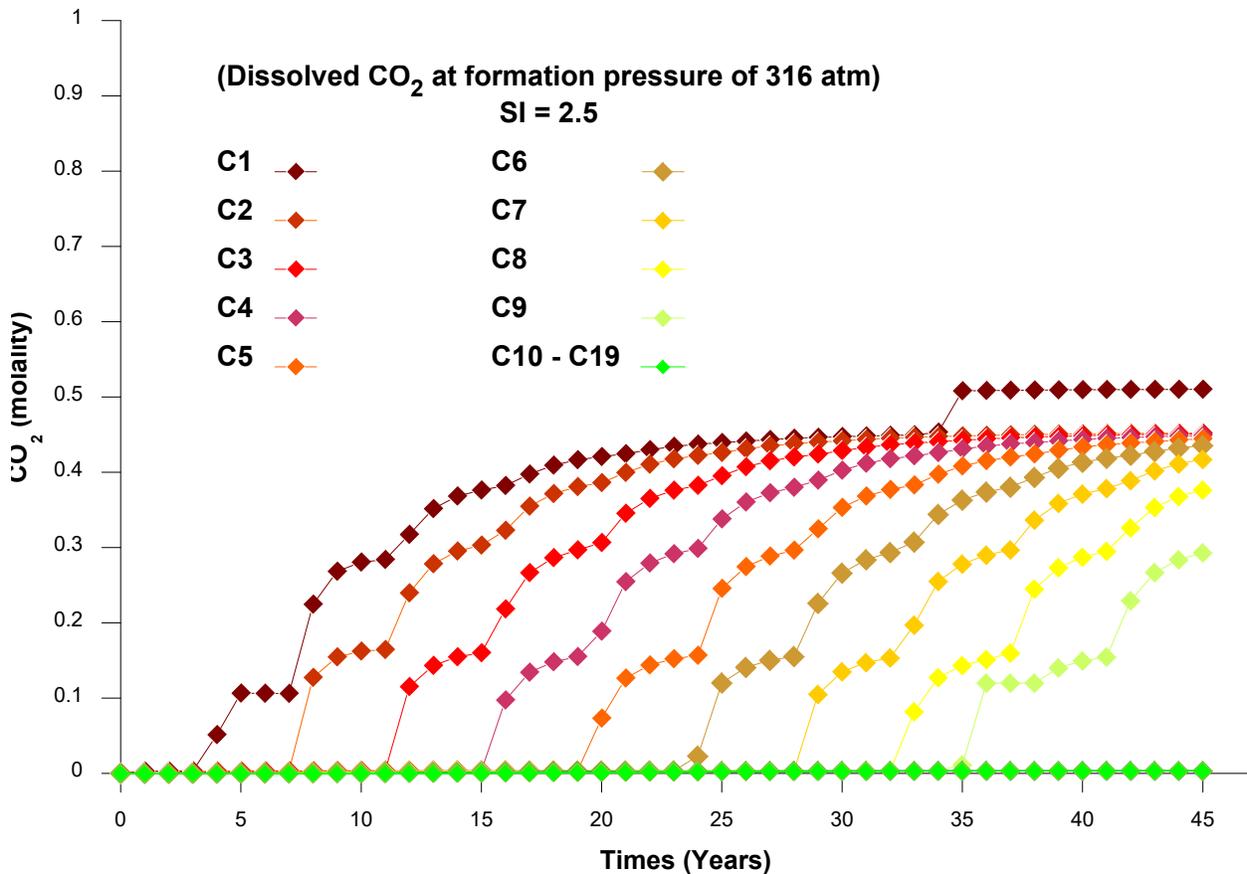


Figure 43. CO₂ concentration (molality) in the Deadwood B shale underlying confining layer for Cells C1–C19.

Figure 2-44 shows the changes in mineral dissolution and precipitation in grams per cubic meter. For Cell C1, K-feldspar is the primary dissolution mineral, with minor chlorite. Illite and quartz precipitation largely replace that dissolution. The reaction rate in the C1 cell dramatically slows after approximately 9 years, and cell geochemistry stabilizes. As Cell C1 stabilizes, dissolution and precipitation begin in Cell C2, with minor amounts of chlorite dissolving and modest precipitation of dolomite.

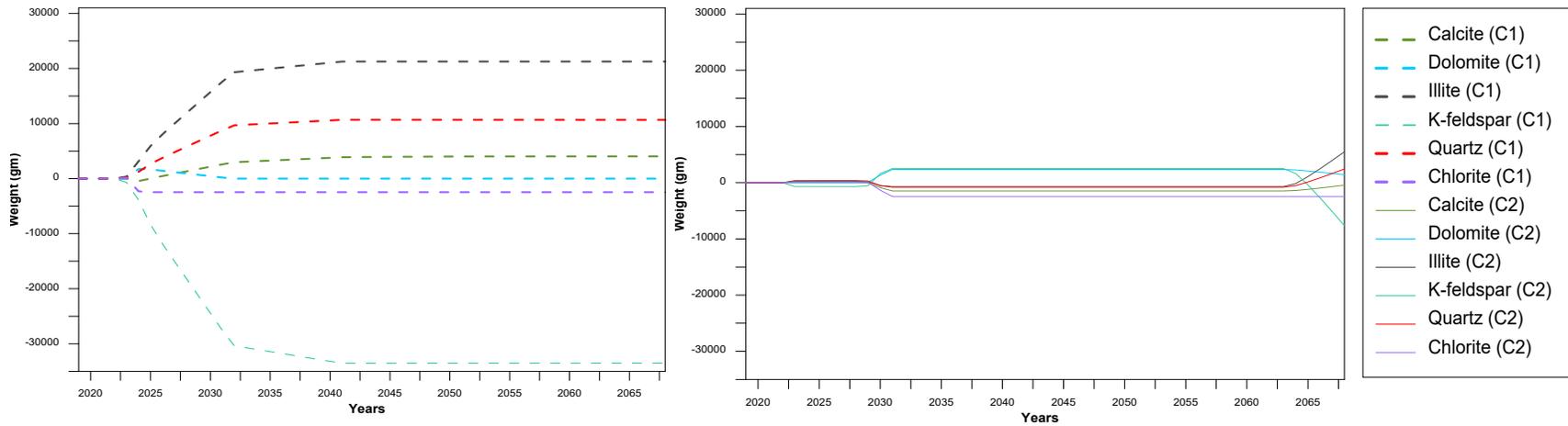


Figure 2-44. Dissolution and precipitation of minerals in the Deadwood B underlying confining layer. Dashed lines show results for Cell C1 at 0 to 1 meter below the Deadwood B top. Solid lines show results for Cell C2 at 1 to 2 meters below the Deadwood B.

Change in porosity (% units) of the Deadwood B underlying confining layer is displayed in Figure 2-45. The overall net porosity changes from dissolution and precipitation are minimal, less than a 0.2% change during the life of the simulation. Cell C1 shows an initial porosity increase of 0.1%, but this change is temporary, and the cell returns to its near-initial porosity value of 2.0%. Cells C2 and C3 undergo similar changes but with progressively longer time delay. At the end of the simulation, no significant net porosity changes were observed for these cells. These results suggest that the Deadwood B will not undergo significant geochemical change in the presence of CO₂ injection.

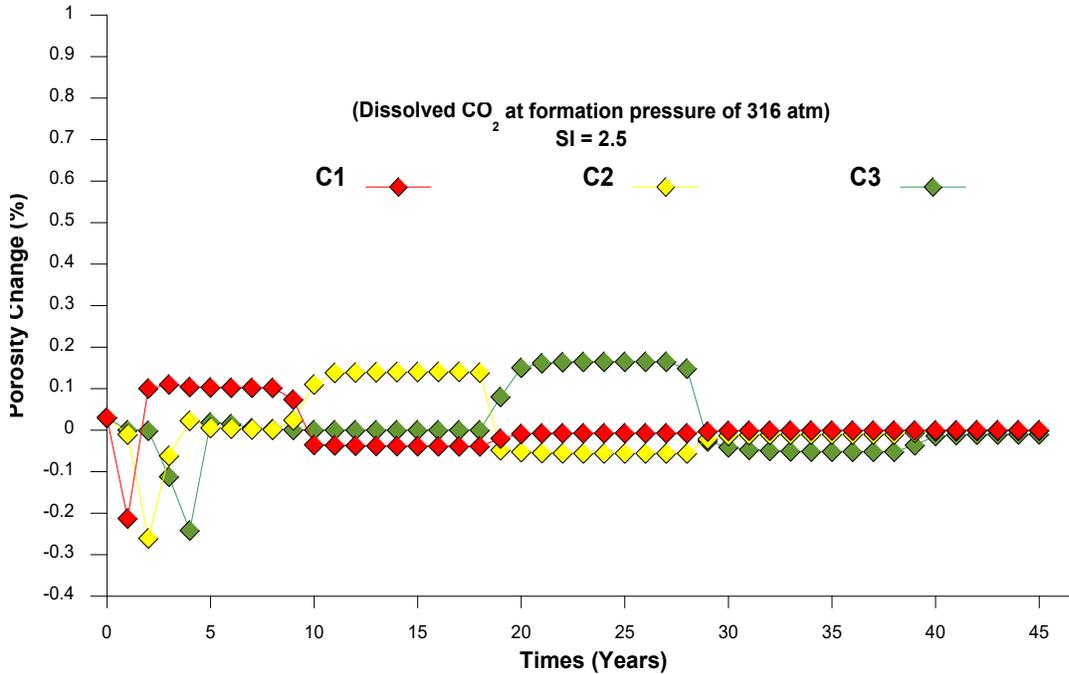


Figure 2-45. Change in percent porosity in the Deadwood B underlying confining layer. The red line shows porosity change for Cell C1 at 0 to 1 meter below the Deadwood B top. The yellow line shows Cell C2 at 1 to 2 meters below the Deadwood B top. The green line shows Cell C3 at 2 to 3 meters below the Deadwood B top. Long-term change in porosity is minimal and stabilized. Cells C4–C19 showed similar results, with net porosity change being less than 0.3%.

2.4.4 Geomechanical Information of Confining Zone

2.4.4.1 Fracture Analysis

Fractures within the Icebox Formation, the overlying confining zone, and Deadwood B Formation, the underlying confining zone, have been assessed during the description of the J-LOC1 well core. Observable fractures were categorized by attributes, including morphology, orientation, aperture, and origin. Secondly, natural, in situ fractures were assessed through the interpretation of Schlumberger's Quanta Geo log acquired during the drilling of the J-LOC1 well.

2.4.4.2 *Fracture Analysis Core Description*

Features within the Icebox Formation are primarily related to the compaction. There is no presence of natural fractures. Only the stylolites which are compaction-related exist; they vary in orientation and exhibit mainly horizontal and rare oblique trends.

In the Deadwood B Formation, rare closed-tension fractures were observed in the core interval and are commonly coincident with the observed horizontal compaction features (stylolite). Quartz is the dominant mineral found to fill observable fractures. The stylolites are well-represented, vary in orientation, and exhibit mainly a horizontal trend.

2.4.4.3 *Borehole Image Fracture Analysis*

Schlumberger's Quanta Geo log was chosen to evaluate the geomechanical condition of the formation in the subsurface. This log provides a 360-degree image of the formation of interest and can be oriented to provide an understanding of the general direction of features observed.

Figures 2-46 and 2-47 show two sections of the interpreted borehole imagery and primary features observed. The far-right track on Figure 2-46 demonstrates that the tool provides information on surface boundaries and bedding features and notes the presence of electrically conductive features that characterize the Icebox Formation. These are interpreted as stylolites. Figure 2-47 reveals the features that are clay-filled because of their electrically conductive signal. The logged interval of the Deadwood B shows that the main features present are stylolites, which are an indication that the formation has undergone a reduction in porosity in response to postdepositional stress.

The diagrams shown in Figures 2-48 and 2-49 provide the orientation of the electrically conductive features in the Icebox and Deadwood B Formations, respectively. As shown, the electrically conductive features are stylolites and have no preferred orientation.

Drilling-induced fractures were not identified either in the Icebox or Deadwood B Formations. However, breakouts were highlighted in the Precambrian basement and are oriented northwest-southeast (Figure 2-50), which is perpendicular to the maximum horizontal stress (SH_{max}).

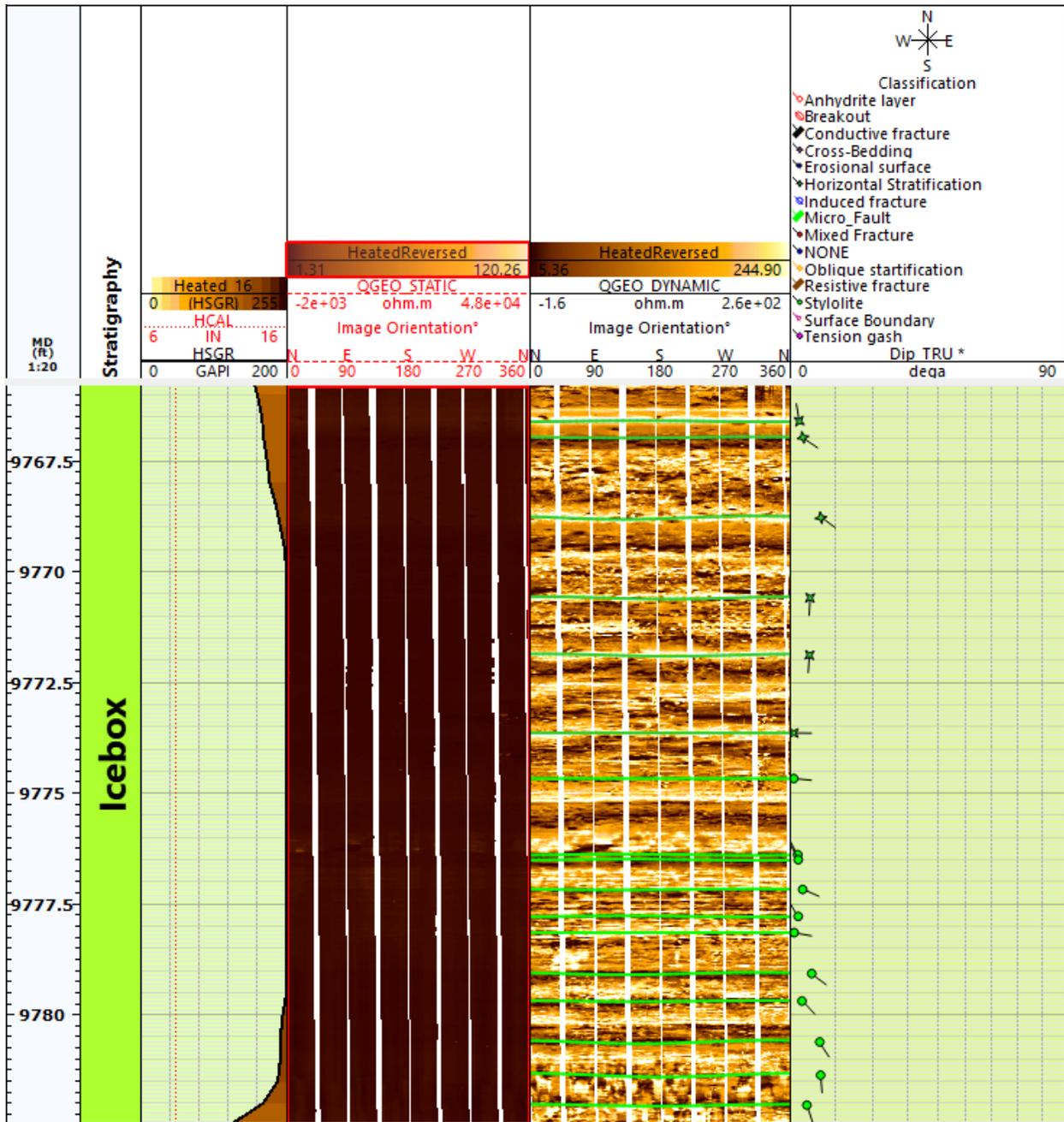


Figure 2-46. Examples of the interpreted Quanta Geo log for the J-LOC1 well. This example shows the common feature types seen in the Icebox Quanta Geo borehole image analysis.

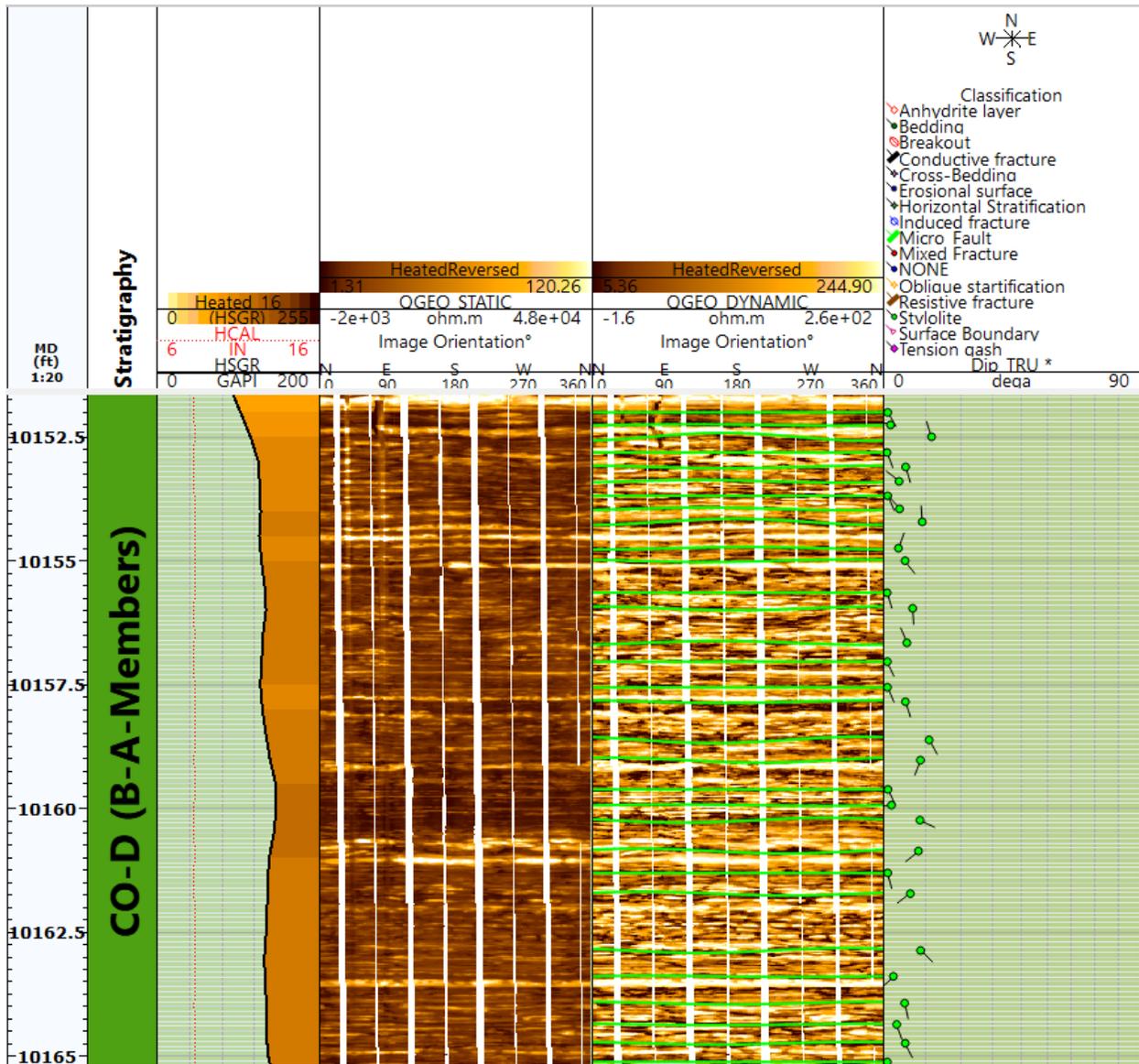


Figure 2-47. Examples of the interpreted Quanta Geo log for the J-LOC1 well. This example shows the common feature types seen in the Deadwood B Quanta Geo borehole image analysis.

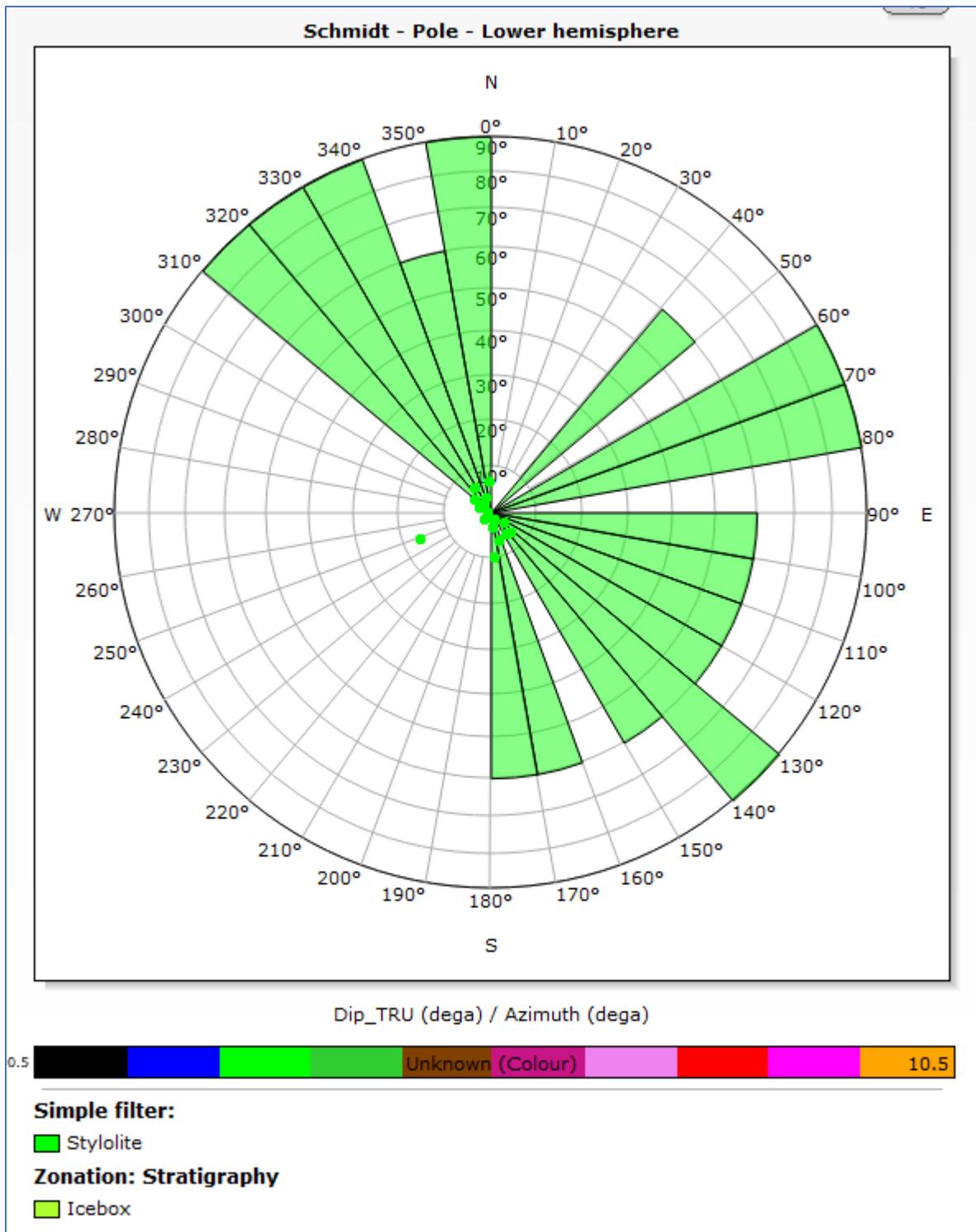


Figure 2-48. This example shows stylolites seen in the Icebox Formation.

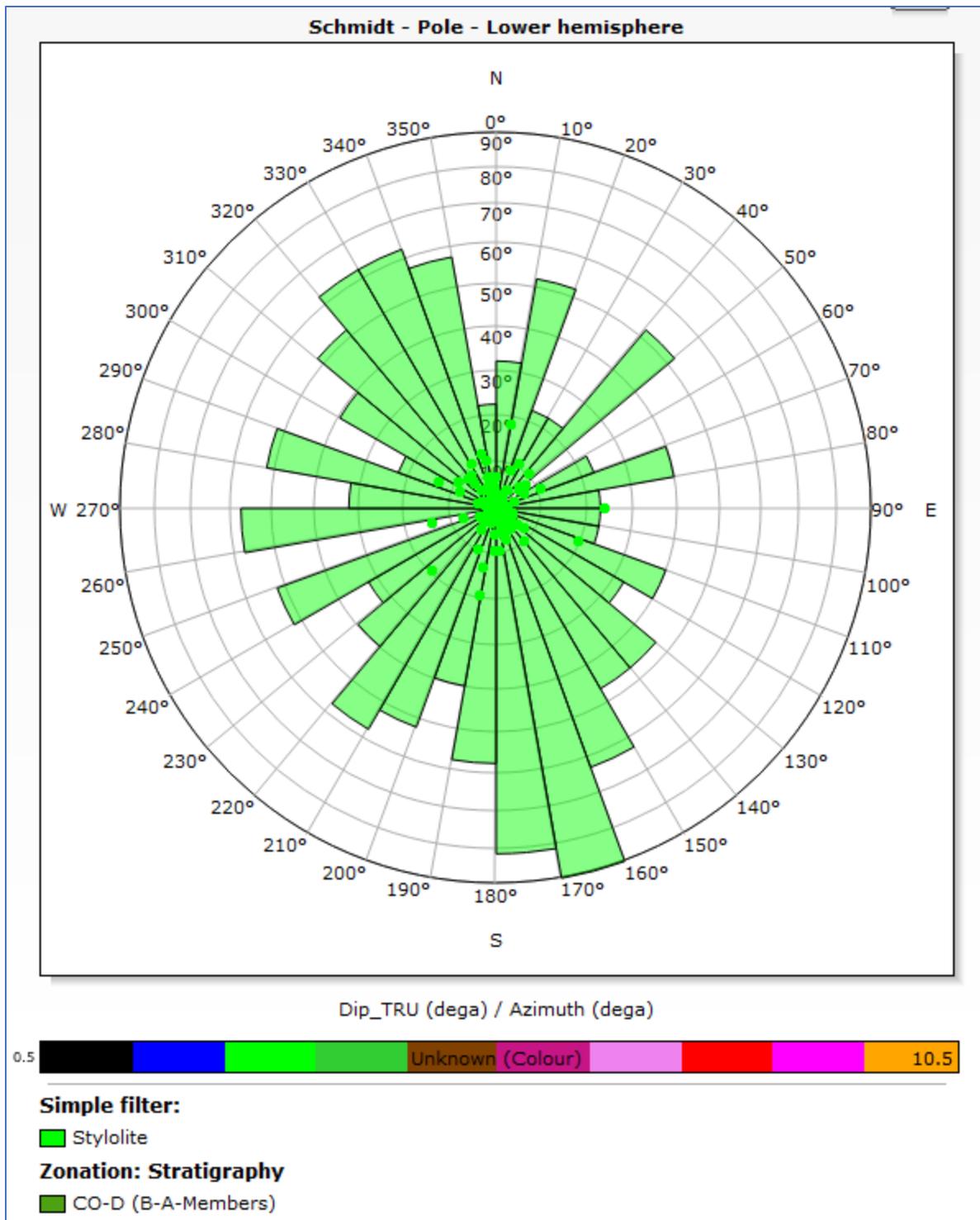


Figure 2-49. This example shows stylolites seen in the Deadwood B Formation.

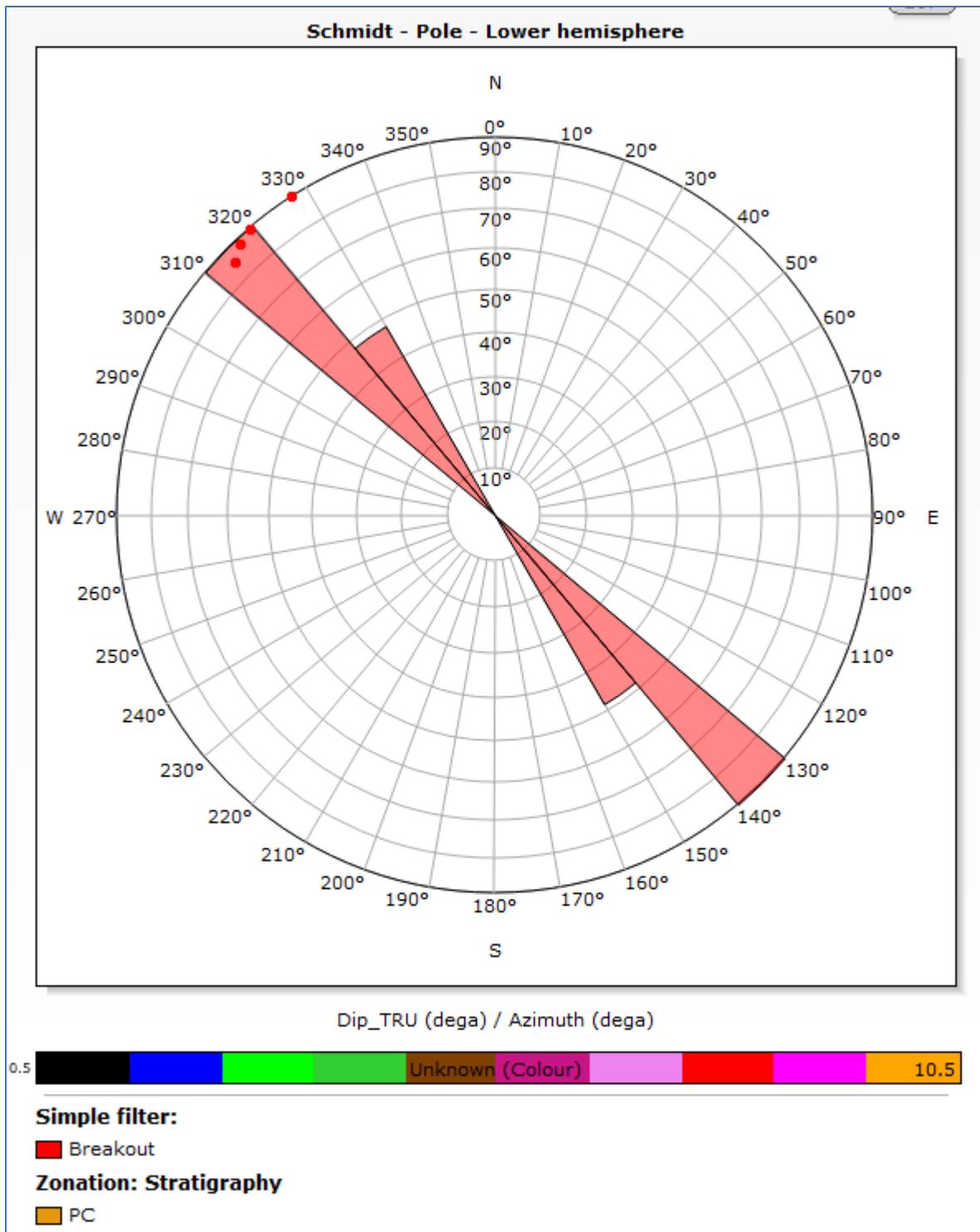


Figure 2-50. Breakout dip orientation in the Precambrian basement.

2.4.4.4 Stress

During drilling of the J-LOC1 well, an openhole MDT microfracture in situ stress test was completed to determine a formation breakdown pressure and minimum horizontal stress. The microfracture in situ stress test operation was performed using the MDT dual-packer module to obtain the formation breakdown pressure followed by multiple injection-falloff cycles to determine formation geomechanics properties. Within the Icebox Formation confining zone, two attempts were made at a depth of 9,749.51 and 9,751.19 ft to determine the formation breakdown pressure and closure pressure, which corresponds to the minimum horizontal stress. Unfortunately, these attempts were unsuccessful to achieve the formation breakdown pressure with an applied maximum injection pressure of 10984.9 and 10867.24 psi (Figure 2-51 and Figure 2-52). The maximum injection pressure was limited by the dual-packer mechanical specifications having a set maximum differential pressure rating between the upper packer and hydrostatic pressure of 5,500 psi; see Appendix D, “Schlumberger Dual-Packer Module.”

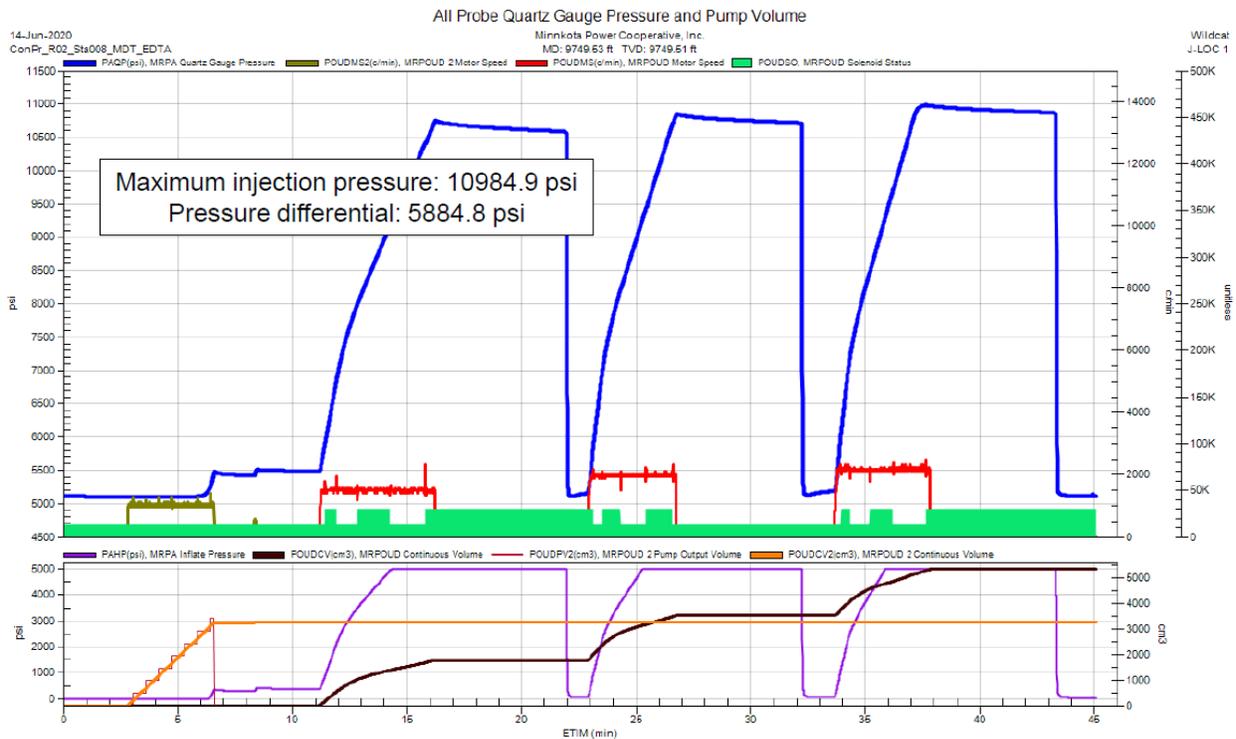


Figure 2-51. J-LOC1 Icebox MDT microfracture in situ stress test (first attempt) at 9,749.51 ft.

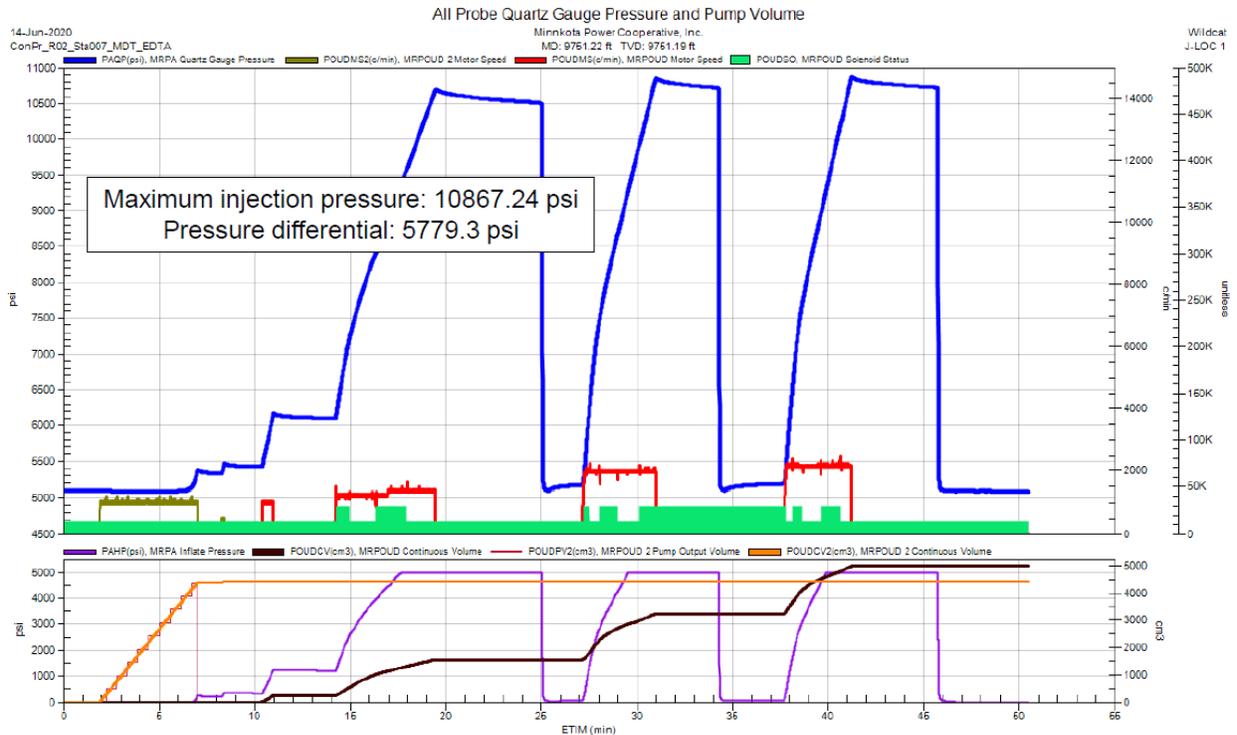


Figure 2-52. J-LOC1 Icebox MDT microfracture in situ stress test (second attempt) at 9,751.19 ft.

J-LOC1 openhole logging data were used to construct a 1D mechanical earth model (MEM) for different formations, including the Icebox Formation. The data available were loaded and quality-checked using Techlog software, where the overburden stress and pore pressure were estimated and calibrated with available MDT data. The elastic properties such as Young’s modulus, Poisson’s ratio, Shear modulus, and Bulk modulus were calculated based on the available well logs. The formation strength properties like uniaxial compressive strength (UCS), tensile strength, friction angle, and cohesion were also estimated from the available data (Figure 2-53). Table 2-21 provides the summary of stresses in the Icebox Formation generated using the 1D MEM.

Depth, ft	Hydrostatic pressure, psi	Vertical Stress, psi	Minimum Stress, psi
9,665	4,349	10,543	6,853
9,780	4,401	10,675	6,557

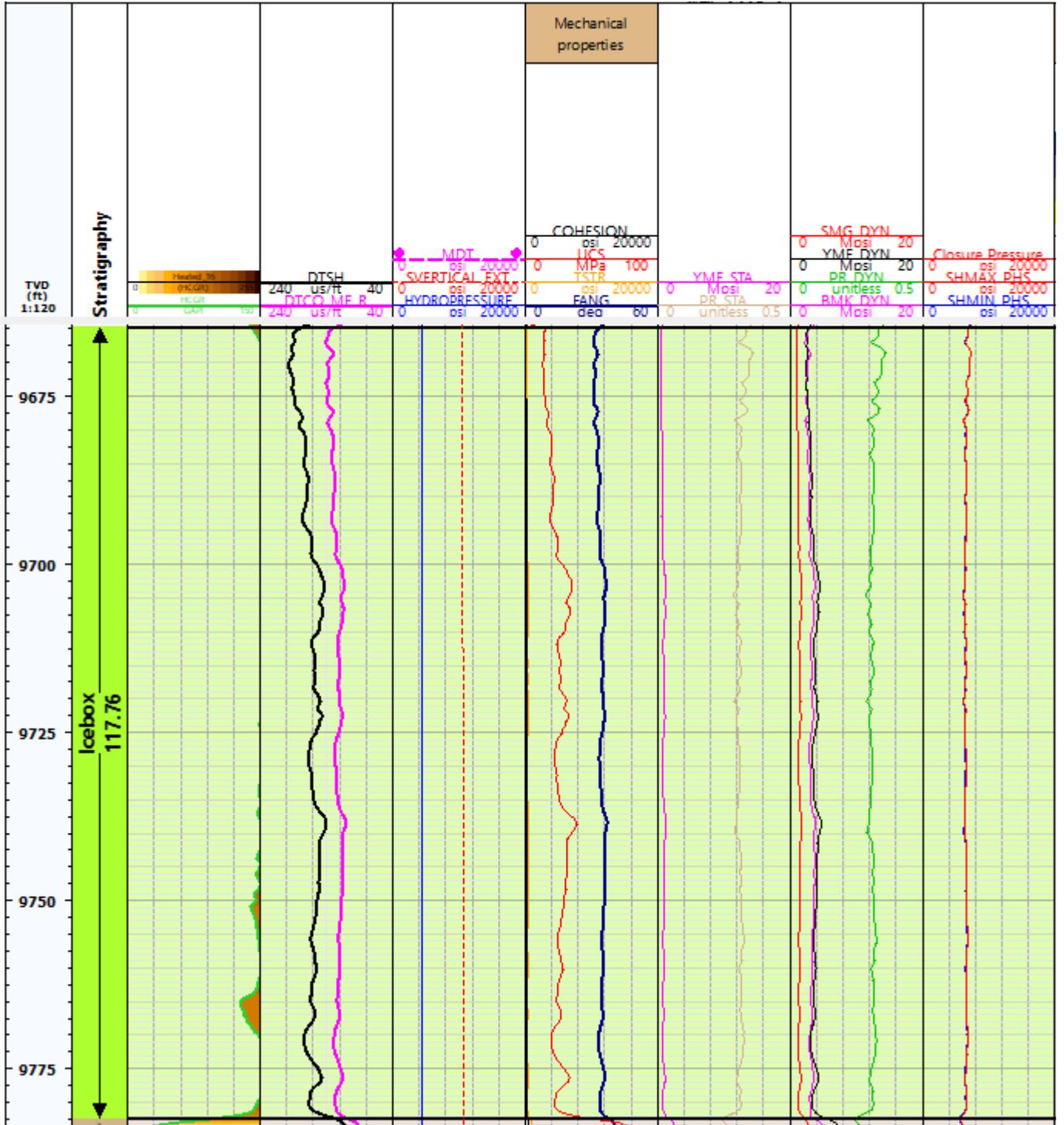


Figure 2-53. 1D MEM of the Icebox Formation.

2.4.4.5 Ductility and Rock Strength

Ductility and rock strength have been determined through laboratory testing of rock samples acquired from the Icebox and Deadwood B Formation cores in the J-LOC1. Icebox Formation samples were not testable. Plugs failed under minor stress because of the fissility of the rock. On the other hand, one sample from the Deadwood B Formation was tested and characterized by a porosity equal to 1.4% and a permeability of 0.001 mD. To determine these parameters, a multistage triaxial test was performed at confining pressures exceeding 40 MPa (5801.51 psi). This commonly used test provides information regarding the elastic parameters and peak strength of a material (Figure 2-54). Table 2-22 shows the sample parameters, while Tables 2-23 and 2-24 show the elastic, dynamic, and velocity parameters obtained at different confining pressures.

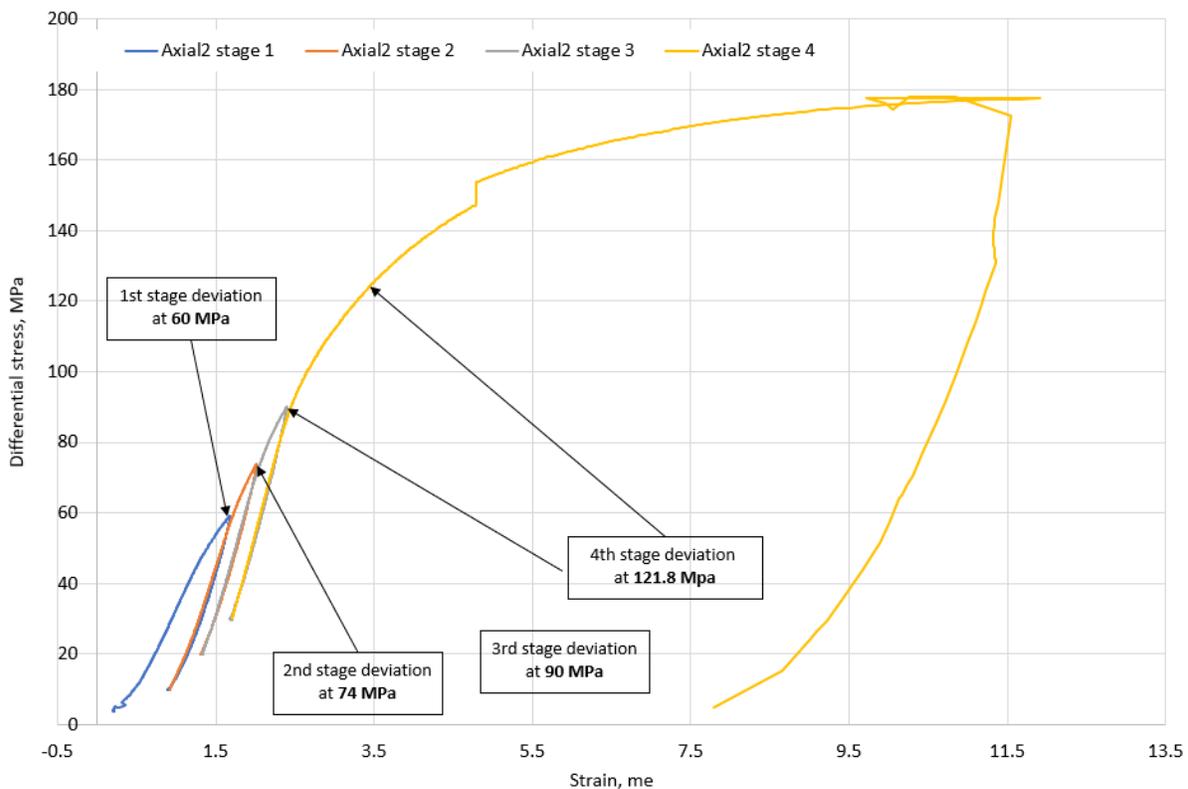


Figure 2-54. Results of multistage triaxial test performed at confining pressures exceeding 40 MPa (5,800 psi), providing information regarding the elastic parameters and peak strength of the rock sample. Failure occurred at the fourth-stage peak stress of 121.8 MPa.

Table 2-22. Sample Parameters

Sample and Experiment Information	
Depth: 10,197.5 ft	Rock Type: Limestone
Formation: Deadwood B	Porosity: 1.4%
Dry Bulk Density: 2.765 g/cm ³	Pore Fluids: –
Diameter: 25.40 mm	Entered Length: 58.17 mm

Table 2-23. Elastic Properties Obtained Through Experimentation: E = Young’s Modulus, n = Poisson’s Ratio, K = Bulk Modulus, G = Shear Modulus, P = Uniaxial Strain Modulus

Elastic Properties Measured at Different Confining Pressures							
Event	Conf., MPa	Diff., MPa	E, GPa	n	K, GPa	G, GPa	P, GPa
1	10.0	9.9	66.75	0.189	35.81	28.06	73.22
2	20.3	20.0	68.77	0.246	51.74	31.60	93.88
3	30.2	29.8	71.50	0.275	64.93	34.30	110.67
4	40.3	29.8	77.00	0.227	46.97	31.38	88.81

Table 2-24. Velocity and Dynamic Properties Obtained Through Experimentation: Vp = P-Wave Velocity, Vs = Shear Wave Velocity, E = Young’s Modulus, n = Poisson’s Ratio

Ultrasonic Velocity Measurements at Different Confining Pressures							
Event	Conf., MPa	Diff., MPa	Vp, m/s	Vs ^(X-direction) m/s	Vs ^(Y-direction) m/s	E, GPa	n, –
0	2.7	–	5172	2712	2944	56.91	0.287
1	10.2	–	5576	2837	3031	62.29	0.309
2	20.2	–	5836	3076	3131	69.39	0.303
3	30.1	–	5943	3098	3174	71.08	0.307
4	40.2	–	5986	3106	3220	72.27	0.306

2.5 Faults, Fractures, and Seismic Activity

In the Tundra SGS area, no known or suspected regional faults or fractures with sufficient permeability and vertical extent to allow fluid movement between formations have been identified through site-specific characterization activities, previous studies, or oil and gas exploration activities. Features interpreted from the 3D seismic data, including paleochannels, a flexure, and a suspected fault in the Precambrian basement, are discussed in this section as well as the data that support the low probability that these features will interfere with containment. The following section also discusses the seismic history of North Dakota and the low probability that seismic activity will interfere with containment.

2.5.1 Interpreted Features

The analysis of 3D seismic data acquired specifically for Tundra SGS in 2019 and 2020 (Figure 2-6) revealed evidence for suspected paleochannels or preferential erosional zones at the top of the Precambrian basement. Maps of the seismic reflection event interpreted to be the Precambrian–Deadwood contact suggest these features are fairly linear in nature (Figure 2-55). In cross-sectional view of the seismic data, these features appear as depressions in the top of the Precambrian and the lower portion of the Deadwood (Figure 2-56 and 2-57). The isopach values depicted in Figure 2-58 suggest erosional relief on the Precambrian surface of nearly 460 ft. The absence of thickness changes in the Winnipeg or other formations overlying the Deadwood associated with these features suggest these features were filled in during the deposition of the Deadwood.

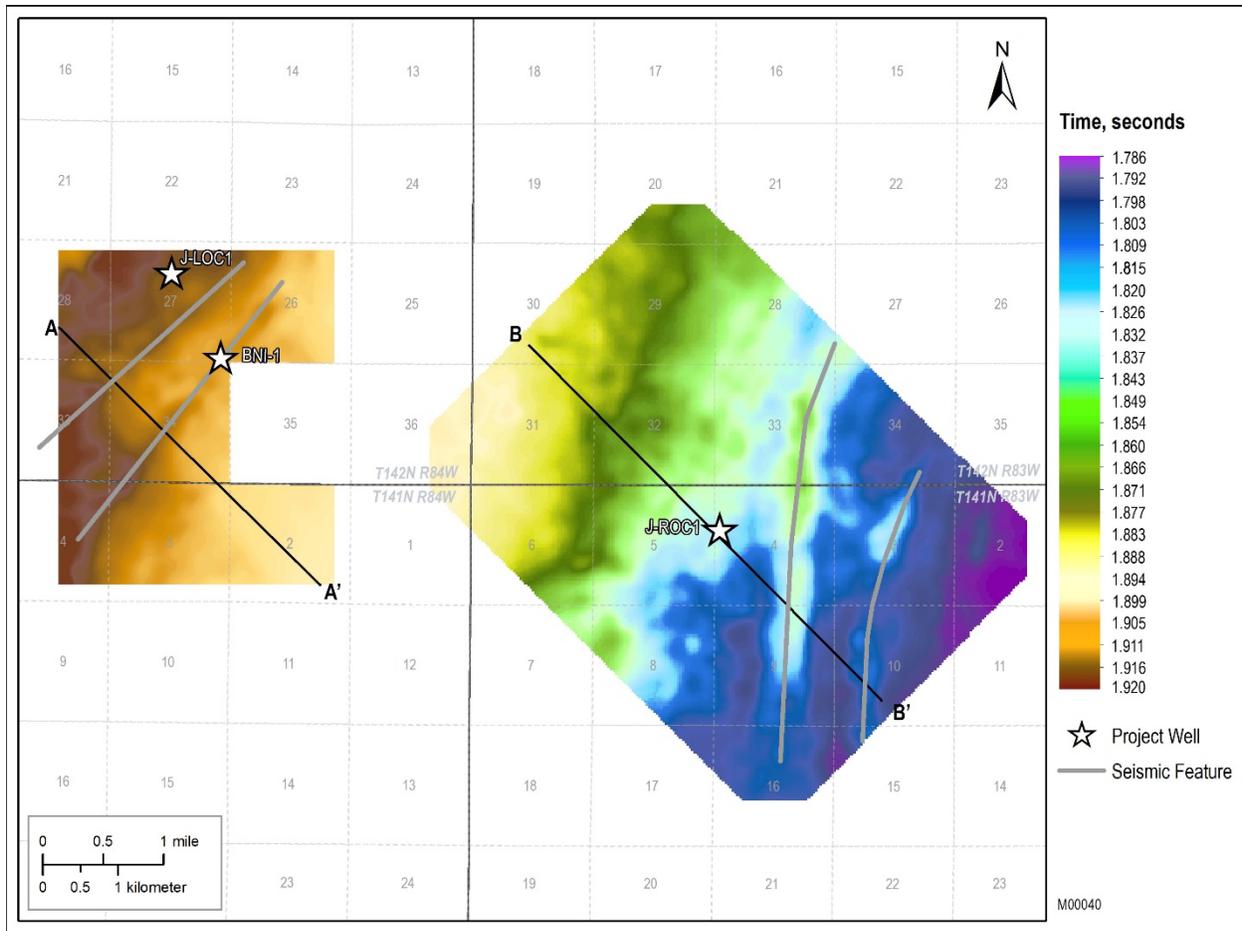


Figure 2-55. Map showing the time structure of the seismic reflection event interpreted to be the Precambrian–Deadwood contact.

In the western 3D seismic survey data, there is no indication that the identified features impact the intervals above the lower Deadwood. Additionally, there is no indication of offset reflections above or below these features in the western 3D seismic survey data that would suggest any deformation or movement associated with these features. There is no evidence to suggest that these interpreted paleochannel features have sufficient permeability or vertical extent to interfere with containment.

There is a flexure in the eastern 3D seismic data where the seismic reflections above the interpreted Precambrian–Deadwood boundary through the Red River Formation appear to dip or sag down (Figure 2-59). These depressions are interpreted to be draped over one of the interpreted paleochannels located at the Precambrian–Deadwood boundary (Figure 2-57). A deep structure was interpreted in the Precambrian basement below this paleochannel and flexure. This structure appears to be a low-dipping thrust fault that terminates at the top of the Precambrian basement (Figure 2-60). The location of this Precambrian fault provides evidence that there was likely

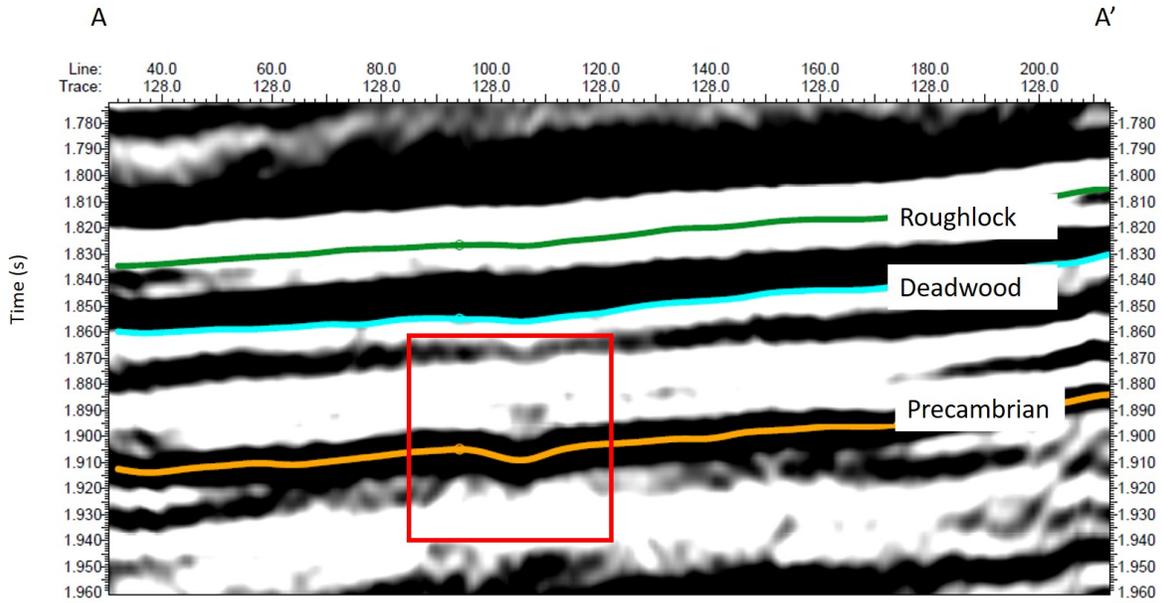


Figure 2-56. Cross-sectional view of the 3D seismic data through one of the linear trends in the West 3D seismic survey. Identified formations include Roughlock (green), Deadwood (blue), and Precambrian (yellow). The red box indicates the area that corresponds to the linear feature. Figure 2-55 shows the location of this cross section.

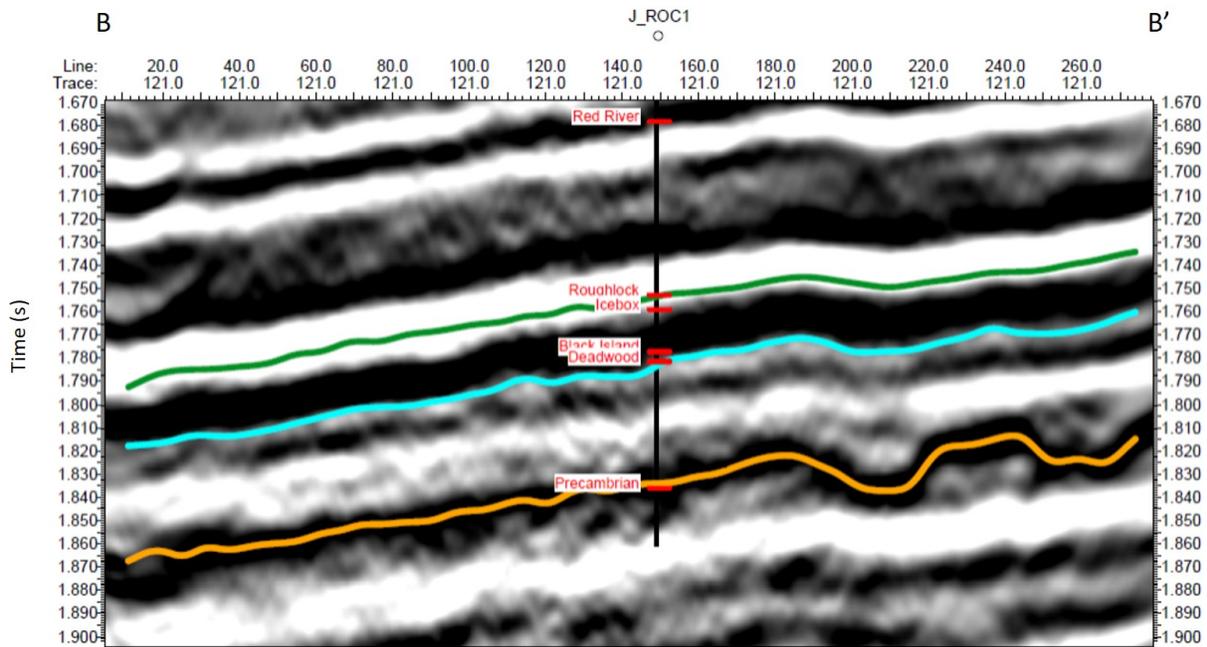


Figure 2-57. Cross-sectional view of the 3D seismic data through one of the linear trends in the east 3D seismic survey. Identified formations include Roughlock (green), Deadwood (blue), and Precambrian (yellow). Depressions along the top of the Precambrian suggest the presence of paleochannels. Figure 2-55 shows the location of this cross section.

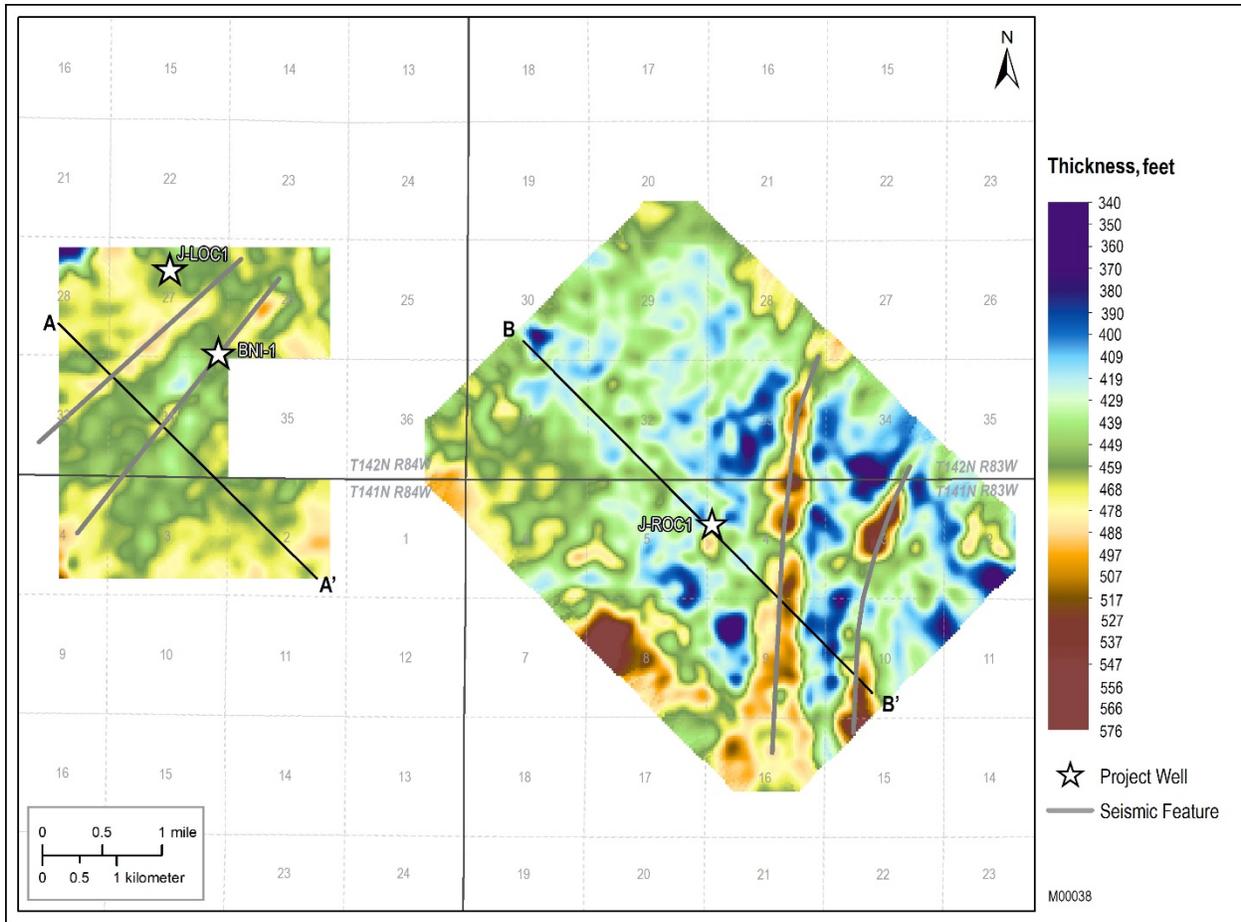


Figure 2-58. Map showing the thickness of the interval from the Precambrian erosional surface up through the top of the Deadwood Formation calculated using the seismic data. The linear trends correspond to areas of increased thickness.

preferential erosion along the exposed Precambrian fault trace during the deposition of the Deadwood Formation. The dip of the Precambrian fault is low-angle whereas the flexure above the paleochannel feature is near-vertical, supporting the interpretation of the fault terminating at the top of the Precambrian basement. The seismic interpretation indicates that the interpreted fault in the Precambrian basement is dipping at ~ 25 degrees relative to horizontal being 0 degrees. The flexure observed in the overlying sediments is likely associated with postdepositional differential compaction above the paleochannel or slump due to movement along this low-angle basement fault. There is no evidence to suggest that this flexural feature has sufficient permeability to interfere with containment.

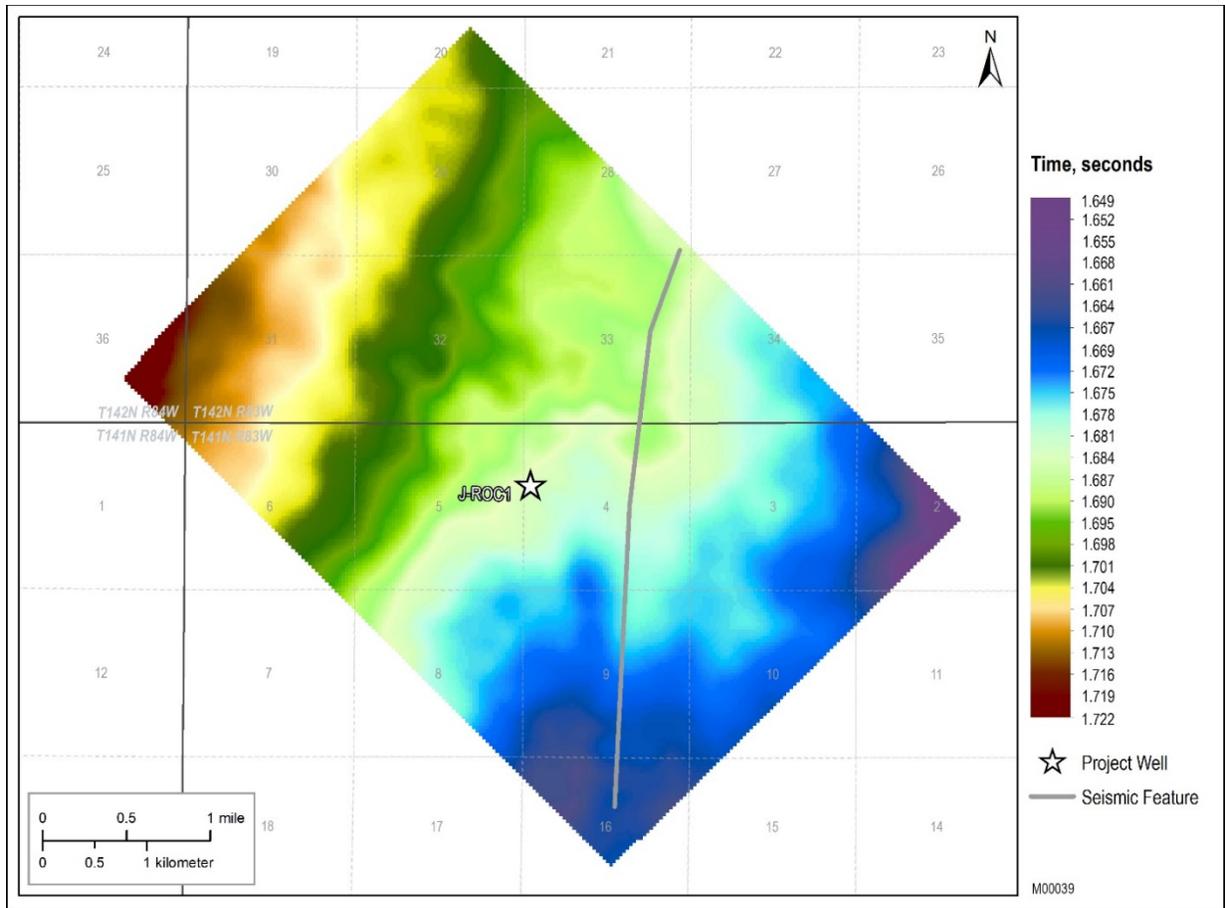


Figure 2-59. Map showing the time structure of the seismic reflection event interpreted to be the top of the Red River Formation. The line shows the location of the interpreted paleochannel that underlies the flexure.

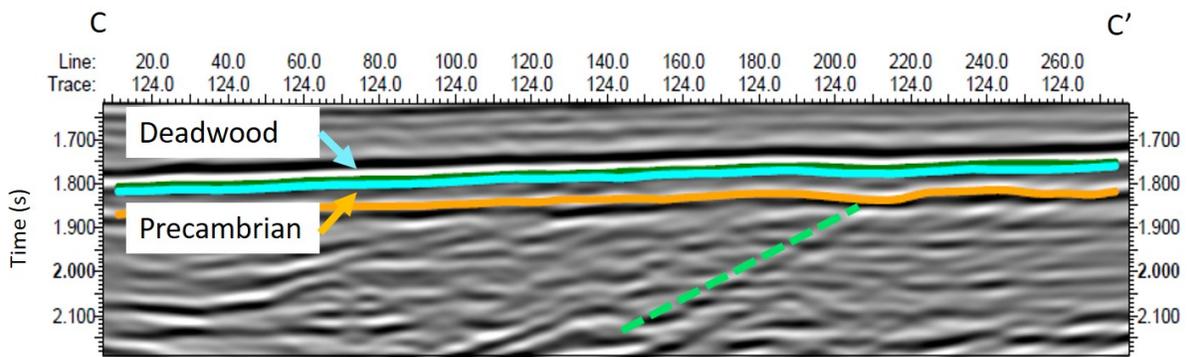


Figure 2-60. Cross-sectional view of the 3D seismic data through one of the linear trends in the east 3D seismic survey. Identified formations include Deadwood (blue) and Precambrian (yellow). The location of the interpreted low-angle thrust fault is shown by the green dashed line. Cross Section C-C' runs parallel to Cross Section B-B' shown in Figure 2-55 and is located 160 ft to the west of Cross Section B-B'.

2.5.5.1 Precambrian Fault Geomechanics Study

Geomechanical modeling was done to determine the potential risk of induced seismicity associated with the interpreted Precambrian fault and planned injection activities. The 3D seismic data were used to estimate the dip and strike of the interpreted fault, including uncertainty ranges on both for input into this modeling. A 1D stress model was built from the J-LOC1 well data using the density, compressional sonic, and shear sonic well logs. The pore pressure is assumed equivalent to hydrostatic pressure, with a slight overpressure in the Broom Creek Formation. Overburden stress was estimated by integrating the density data and projecting the density trend to surface. The principal horizontal stresses $S_{H_{min}}$ and $S_{H_{max}}$ were estimated using the modified Eaton poroelastic model from Theircelin and Plumb (1994) and calibrated to closure pressure measurements in the Deadwood, Broom Creek, and Inyan Kara Formations. Static elastic rock property inputs were calibrated to core measurements. The most conservative approach was taken by choosing the largest differential stress model to conduct the analysis, as it represented the highest risk scenario. A stress trend was developed to represent a consistent stress trend through the Deadwood Formation that was an equivalent trend through the highest-magnitude stresses. For the purposes of failure analysis on the existing feature in the seismic interpretation, that stress trend was projected down into the Precambrian basement.

To understand the highest possible risk scenario, the scenario where the interpreted Precambrian fault extends into the Deadwood Formation was considered even though the seismic data do not suggest that it does. Conservative estimates for friction coefficient (30) and cohesion (0) were used in this analysis. Given those conditions and the state of stress modeled in the Deadwood, the failure analysis indicated that a pressure increase of 3,600–4,800 psi would be required to induce shear failure on that feature (Figure 2-61).

The maximum expected pressure change in the Deadwood due to planned injection activities does not exceed 1,800 psi, which is well below the 3,600–4,800-psi pressure threshold for failure (Figure 2-62). Additionally, the injection interval is approximately 120 ft above the Precambrian–Deadwood boundary and the expected pressure change due to planned injection activities at the Precambrian–Deadwood boundary does not exceed 60 psi. Analysis of the geomechanics study results as applied to the characteristics of the interpreted Precambrian fault and site-specific geomechanical data suggests planned injection activities will not cause induced seismicity.

Additionally, sensitivity analysis was run using the publicly available Fault Slip Potential tool using the inputs of friction coefficient, $S_{H_{max}}$ azimuth, fault dip, fault strike, pore pressure, $S_{H_{max}}$ magnitude, $S_{H_{min}}$ magnitude, and overburden magnitude. The results proved insensitive to all inputs except the dip of the fault. At the low-angle dip of the fault, there is very low risk of failure given the interpretation of the state of stress.

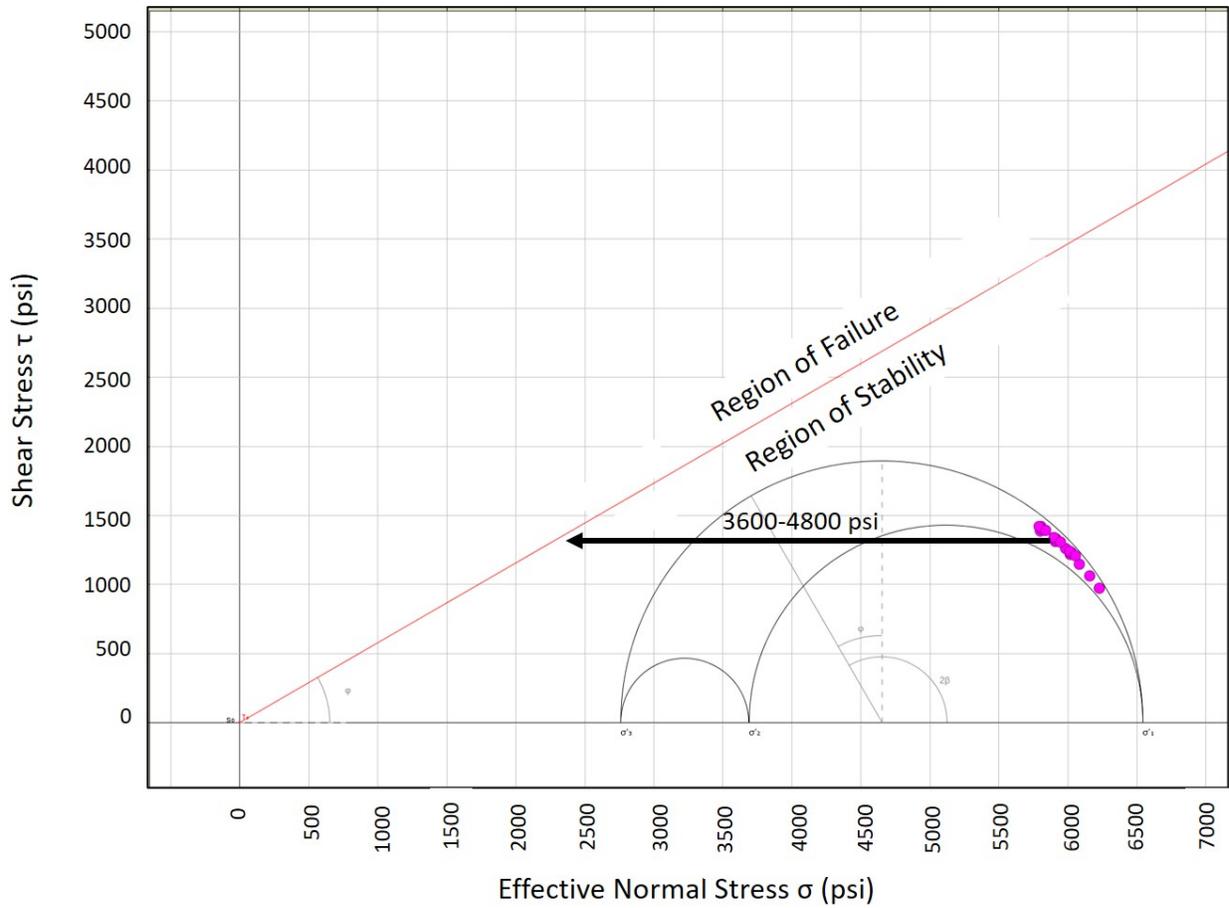


Figure 2-61. Mohr circle depiction of the stress state at the depth of the Deadwood Formation indicates a pressure window of 3,600 to 4,800 psi to create failure on the fault represented by the pink dots. Pink dots represent the strike and dip values for the fault interpreted from the seismic data relative to in situ stress orientations.

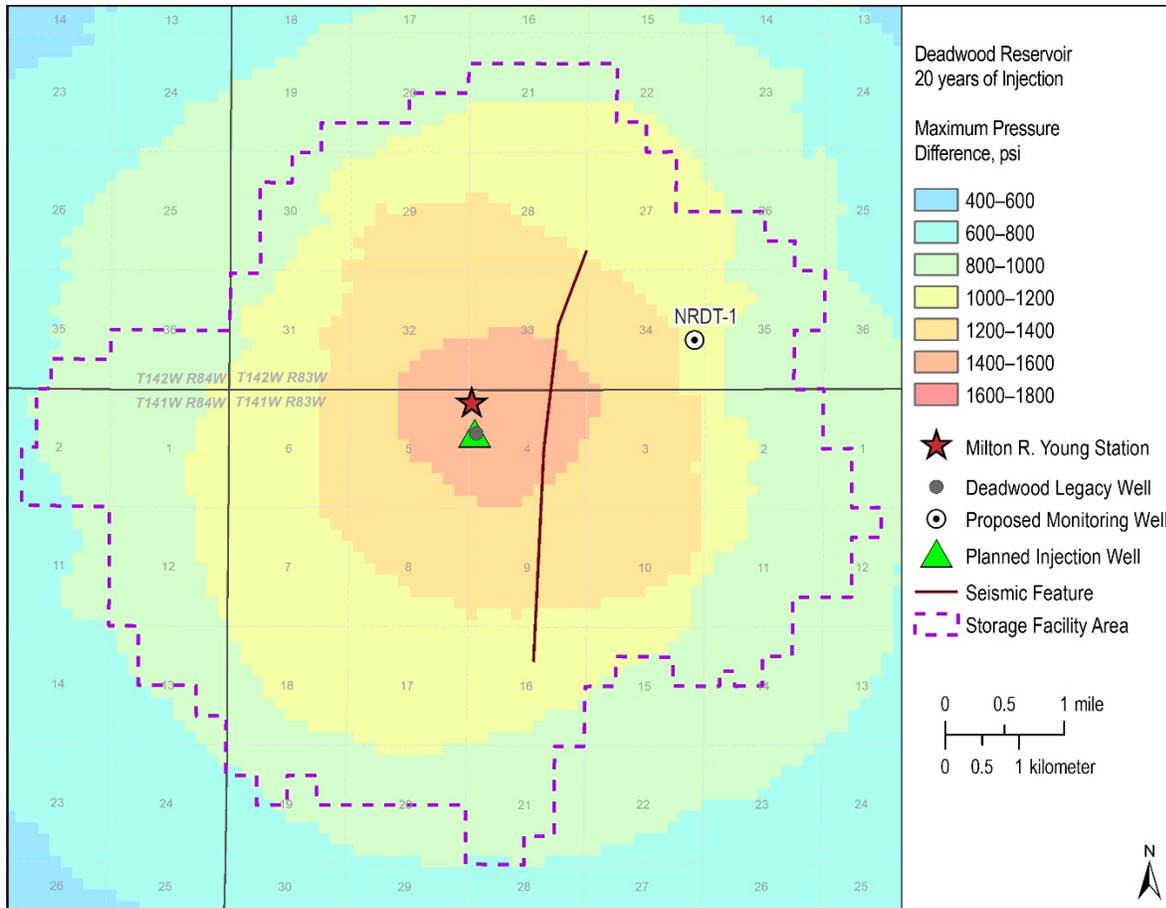


Figure 2-62. Map showing the maximum pressure change expected within the injection zone from the proposed injection activities. The location of the interpreted paleochannel and flexure is indicated by the red line.

2.5.2 Seismic Activity

The Williston Basin is a tectonically stable region of the North American Craton. Zhou and others (2008) summarize that “the Williston Basin as a whole is in an overburden compressive stress regime,” which could be attributed to the general stability of the North American Craton. Interpreted structural features associated with tectonic activity in the Williston Basin in North Dakota include anticlinal and synclinal structures in the western half of the state, lineaments associated with Precambrian basement block boundaries, and faults (North Dakota Industrial Commission, 2019).

Between 1870 and 2015, 13 seismic events were detected within the North Dakota portion of the Williston Basin (Table 2-25) (Anderson, 2016). Of these 13 seismic events, only three occurred along one of the eight interpreted Precambrian basement faults in the North Dakota portion of the Williston Basin (Figure 2-63). The seismic event recorded closest to the Tundra SGS storage facility area occurred 39.6 mi from the J-ROC1 well near Huff, North Dakota (Table 2-25). The magnitude of this seismic event is estimated to have been 4.4.

Table 2-25. Summary of Seismic Events Reported to Have Occurred in North Dakota (from Anderson, 2016)

Date	Magnitude	Depth, mi	Longitude	Latitude	City or Vicinity of Seismic Event	Map Label	Distance to Tundra SGS J-ROC1 Well, mi
Sept 28, 2012	3.3	0.4*	-103.48	48.01	Southeast of Williston	A	124.6
June 14, 2010	1.4	3.1	-103.96	46.03	Boxelder Creek	B	149.1
March 21, 2010	2.5	3.1	-103.98	47.98	Buford	C	144.1
Aug 30, 2009	1.9	3.1	-102.38	47.63	Ft. Berthold Southwest	D	67.4
Jan. 3, 2009	1.5	8.3	-103.95	48.36	Grenora	E	156.0
Nov 15, 2008	2.6	11.2	-100.04	47.46	Goodrich	F	61.6
Nov 11, 1998	3.5	3.1	-104.03	48.55	Grenora	G	166.5
March 9, 1982	3.3	11.2	-104.03	48.51	Grenora	H	164.9
July 8, 1968	4.4	20.5	-100.74	46.59	Huff	I	39.6
May 13, 1947	3.7**	U	-100.90	46.00	Selfridge	J	74.9
Oct 26, 1946	3.7**	U	-103.70	48.20	Williston	K	140.2
April 29, 1927	0.2**	U	-102.10	46.90	Hebron	L	43.4
Aug 8, 1915	3.7**	U	-103.60	48.20	Williston	M	136.4

* Estimated depth.

** Magnitude estimated from reported modified Mercalli intensity (MMI) value.

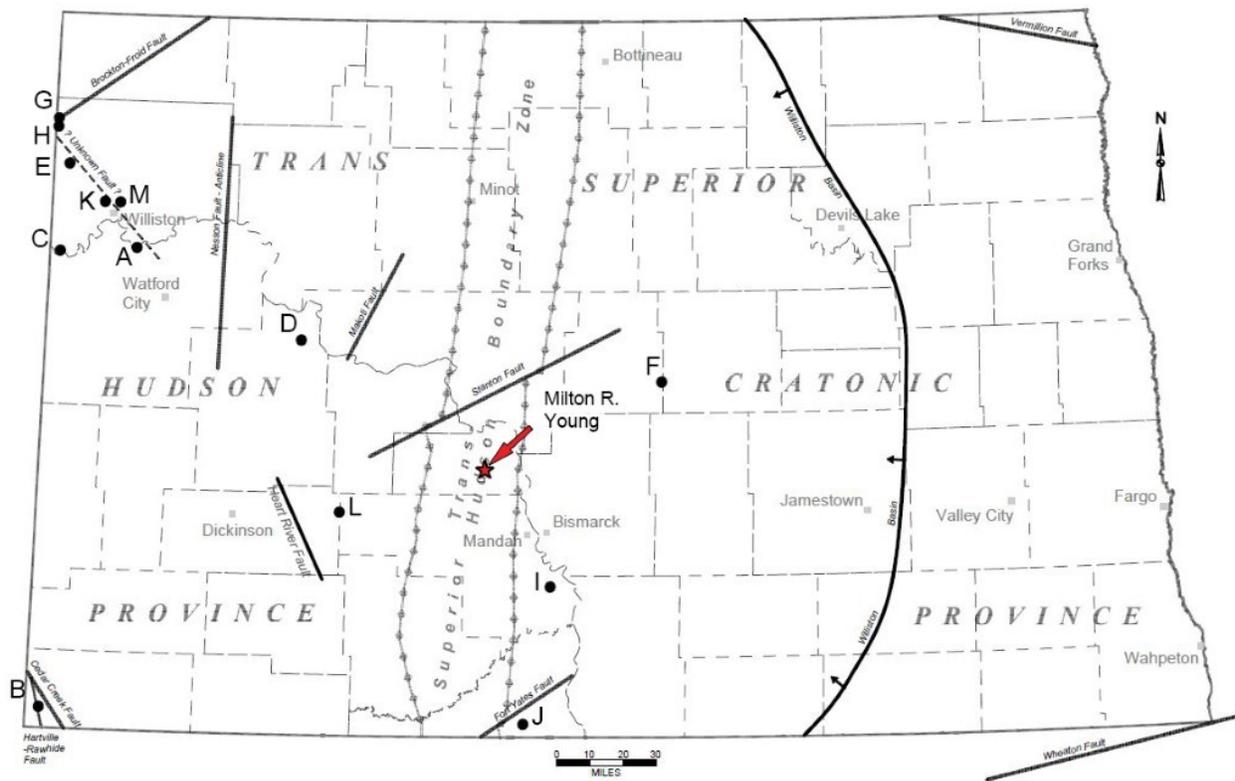


Figure 2-63. Location of major faults, tectonic boundaries, and seismic events in North Dakota (modified from Anderson, 2016). The black dots indicate seismic event locations listed in Table 2-24.

Studies completed by the U.S. Geological Survey (USGS) indicate there is a low probability of damaging seismic events occurring in North Dakota, with less than two damaging seismic events predicted to occur over a 10,000-year time period (Figure 2-64) (U.S. Geological Survey, 2019). A 1-year seismic forecast (including both induced and natural seismic events) released by USGS in 2016 determined North Dakota has very low risk (less than 1% chance) of experiencing any seismic events resulting in damage (U.S. Geological Survey, 2016). Frohlich and others (2015) state there is very little seismic activity near the injection wells in the Williston Basin. They noted only two historic seismic events in North Dakota that could be associated with nearby oil and gas activities. These results indicate relatively stable geologic conditions in the region surrounding the potential injection site. Based on the review and assessment of 1) the USGS studies, 2) the characteristics of the Black Island and Deadwood injection zone and upper and lower confining zones, 3) the low risk of induced seismicity due to the basin stress regime, and 4) the history of recorded seismic events, seismic activity is not expected to interfere with containment of the maximum volume of CO₂ proposed to be injected annually over the life of this project.

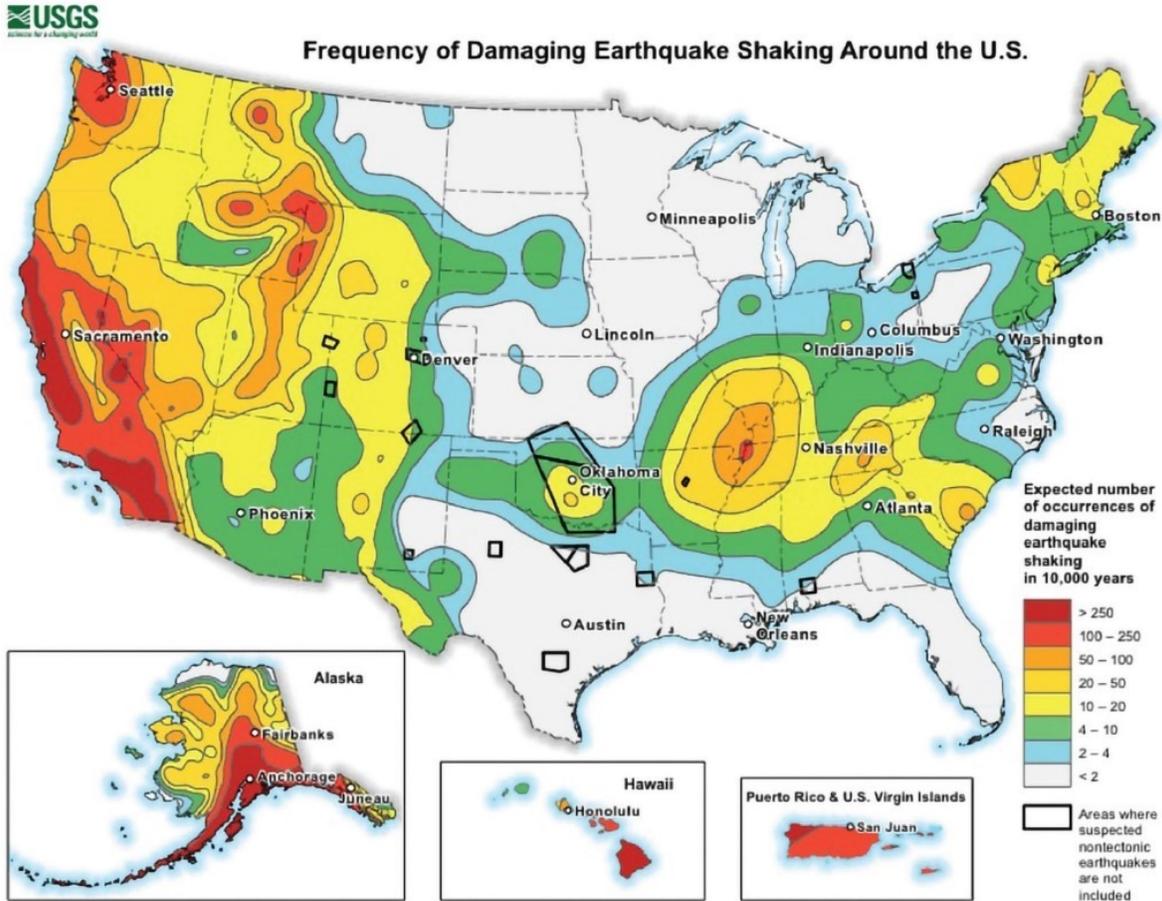


Figure 2-64. Probabilistic map showing how often scientists expect damaging seismic event shaking around the United States (U.S. Geological Survey, 2019). The map shows there is a low probability of damaging seismic events occurring in North Dakota.

2.6 Potential Mineral Zones

There has been no historic hydrocarbon exploration in, or production from, formations above the Deadwood Formation in the storage facility area. The only hydrocarbon exploration well near the storage facility area, the Herbert Dresser 1-34 (NDIC File No. 4937), was drilled in 1970 to explore potential hydrocarbons in the Charles Formation. The well was dry and did not suggest the presence of hydrocarbons. There are no known producible accumulations of hydrocarbons in the storage facility area.

Shallow gas resources can be found in many areas of North Dakota. North Dakota regulations define shallow gas resources as “gas produced from a zone that consists of strata or formation, including lignite or coal strata or seam, located above the depth of five thousand feet (1,524 meters) below the surface, or located more than five thousand feet (1,524 meters) below the surface but above the top of the Rierdon Formation (Jurassic), from which gas may be produced.”

Lignite coal currently is mined in the area of the Center coal mine, operated by BNI Coal. The Center Mine currently mines the Hagel coal seam for use as fuel at Minnkota’s MRYS. The Hagel coal seam is the lowermost major lignite present in the area in the Sentinel Butte Formation.

Thickness of the Hagel coal seam averages 7.8 ft in the area permitted to be mined but varies, with some areas exceeding 10 ft in thickness (Figure 2-65) (Ellis and others, 1999). Coal seams in the Bullion Creek Formation exist in the area below the Hagel seam, but currently the Hagel is the only economically minable seam with its thickness and overburden of 100 ft or less (Figure 2-66). The thickness of the Hagel and other coal seams in the Fort Union Group thicken and deepen to the west. The overlying Beulah–Zap coal seam pinches out farther to the west but is economically minable in the central part of Mercer County at North American Coal’s Coteau Mine. The Hagel seam pinches out to the east, and there are no other coal seams mined farther east than the Hagel.

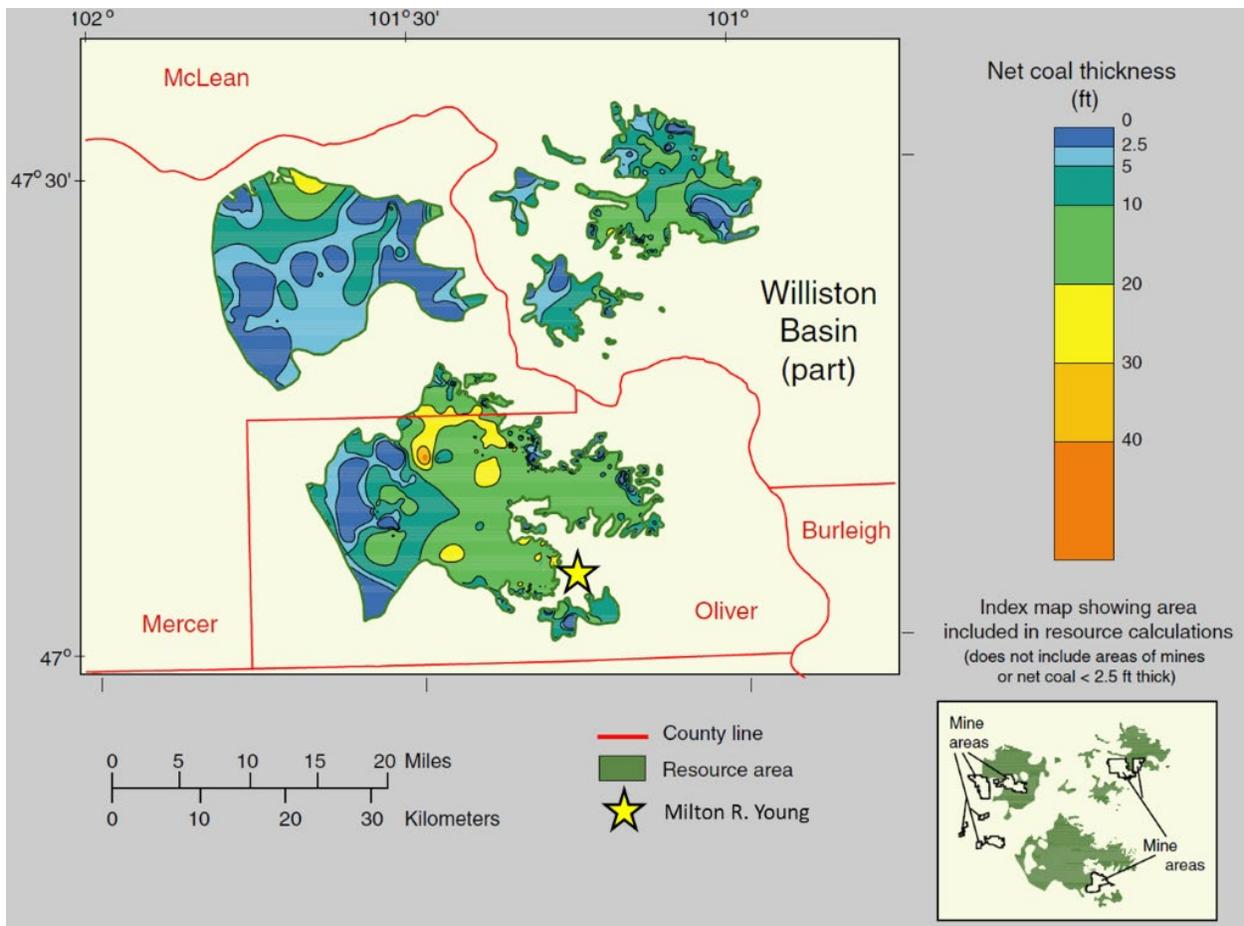


Figure 2-65. Hagel net coal isopach map (modified from Ellis and others, 1999).

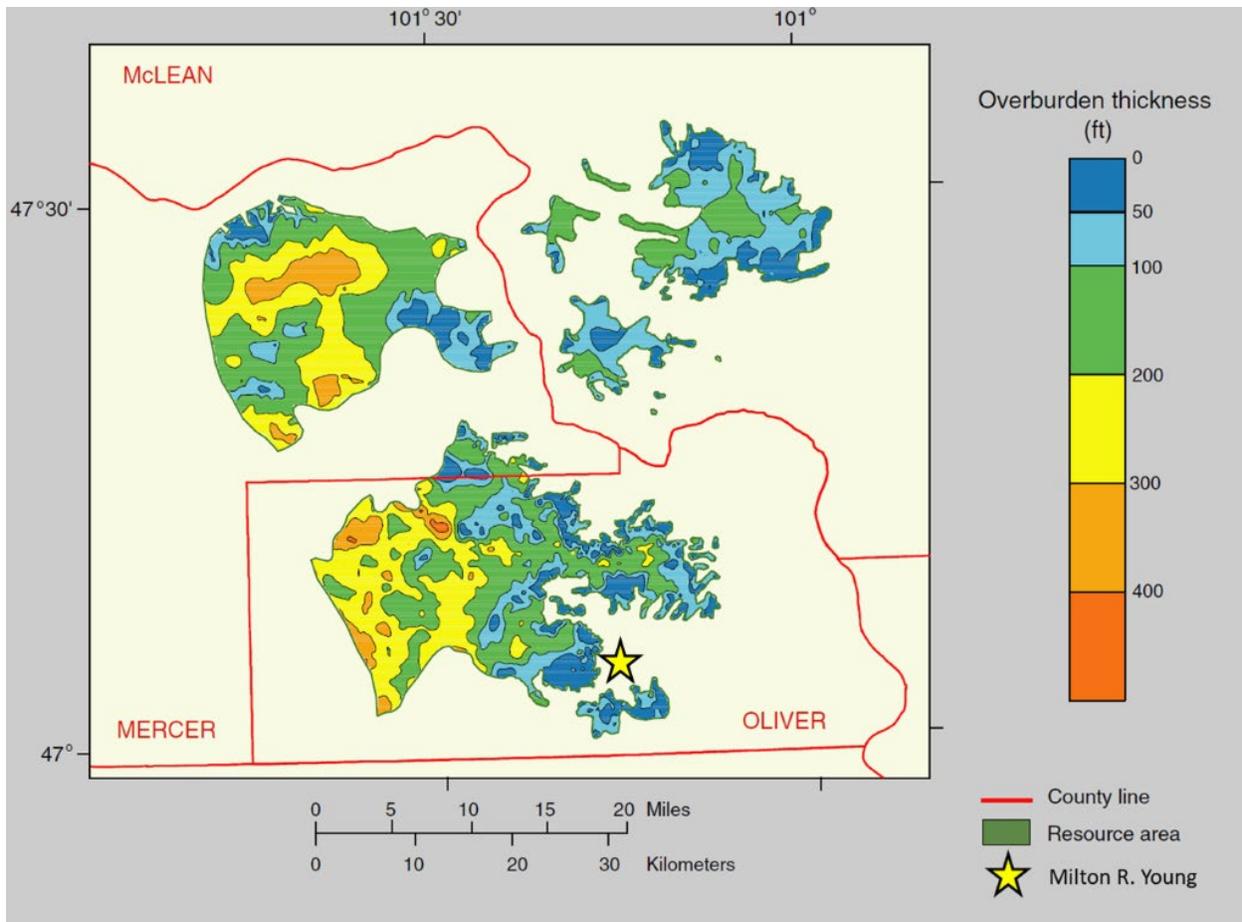


Figure 2-66. Hagel overburden isopach map (modified from Ellis and others, 1999).

2.7 References

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3.0 AREA OF REVIEW

3.1 Area of Review Delineation

3.1.1 Written Description

North Dakota carbon dioxide (CO₂) storage regulations require that each storage facility permit delineate an area of review (AOR), which is defined as “the region surrounding the geologic storage project where underground sources of drinking water (USDWs) may be endangered by the injection activity” (North Dakota Administrative Code [NDAC] § 43-05-01-01[4]). Concern regarding the endangerment of USDWs is related to the potential vertical migration of CO₂ and/or brine from the injection zone to the USDW. Therefore, the AOR encompasses the region overlying the injected free-phase CO₂ and the region overlying the extent of formation fluid pressure (Figure 3-1) increase sufficient to drive formation fluids (e.g., brine) into USDWs, assuming pathways for this migration (e.g., abandoned wells or fractures) are present. The minimum fluid pressure increase in the reservoir that results in a sustained flow of brine upward into an overlying drinking water aquifer is referred to as the “critical threshold pressure increase” and resultant pressure as the “critical threshold pressure.” Application of the U.S. Environmental Protection Agency (EPA) method shows the critical threshold pressure increase at the top of the Deadwood Formation using site-specific data from J-ROC1 was determined to be 127 psi (Appendix A, Table A-4).

Appendix A includes a detailed discussion on the computational modeling and simulations (e.g., CO₂ plume extent, pressure front, AOR boundary, etc.), assumptions, and justification used to delineate the AOR and method for delineation of the AOR.

NDAC § 43-05-01-05 subsection 1(b)(3) requires, “A review of the data of public record, conducted by a geologist or engineer, for all wells within the facility area, which penetrate the storage reservoir or primary or secondary seals overlying the reservoir, and all wells within the facility area and within one mile [1.61 kilometers], or any other distance as deemed necessary by the commission, of the facility area boundary.” Based on the computational methods used to simulate CO₂ injection activities and associated pressure front (Figure 3-1), the resulting AOR for Tundra SGS is delineated as being 1 mi beyond the storage facility area boundary. This extent ensures compliance with existing state regulations.

All wells located in the AOR that penetrate the storage reservoir and its primary overlying seal were evaluated (Figures 3-2 through 3-5) by a professional engineer pursuant to NDAC § 43-05-01-05 subsection 1(b)(3). The evaluation was performed to determine if corrective action is required and included a review of all available well records (Table 3-1). The evaluation determined that all abandoned wells within the AOR have sufficient isolation to prevent formation fluids or injected CO₂ from vertically migrating outside of the storage reservoir or into USDWs and that no corrective action is necessary (Tables 3-2 through 3-5 and Figures 3-6 through 3-8).

An extensive geologic and hydrogeologic characterization performed by a team of geologists from the Energy & Environmental Research Center (EERC) resulted in no evidence of transmissive faults or fractures in the upper confining zone within the AOR and revealed that the upper confining zone has sufficient geologic integrity to prevent vertical fluid movement. All geologic data and investigations indicate the storage reservoir within the AOR has sufficient

containment and geologic integrity, including geologic confinement above and below the injection zone, to prevent vertical fluid movement.

This section of the storage facility permit application is accompanied by maps and tables that include information required and in accordance with NDAC §§ 43-05-01-05 subsections 1(a) and 1(b) and 43-05-01-05.1 subsection 2, such as the storage facility area, location of any proposed injection wells or monitoring wells, presence of significant surface structures or land disturbances, and location of water wells and any other wells within the AOR. Table 3-1 lists all the surface and subsurface features that were investigated as part of the AOR evaluation, pursuant to NDAC §§ 43-05-01-05 subsections 1(a) and 1(b)(3) and 43-05-01-05.1 subsection 2. Surface features that were investigated but not found within the AOR boundary were identified in Table 3-1.

3.1.2 Supporting Maps

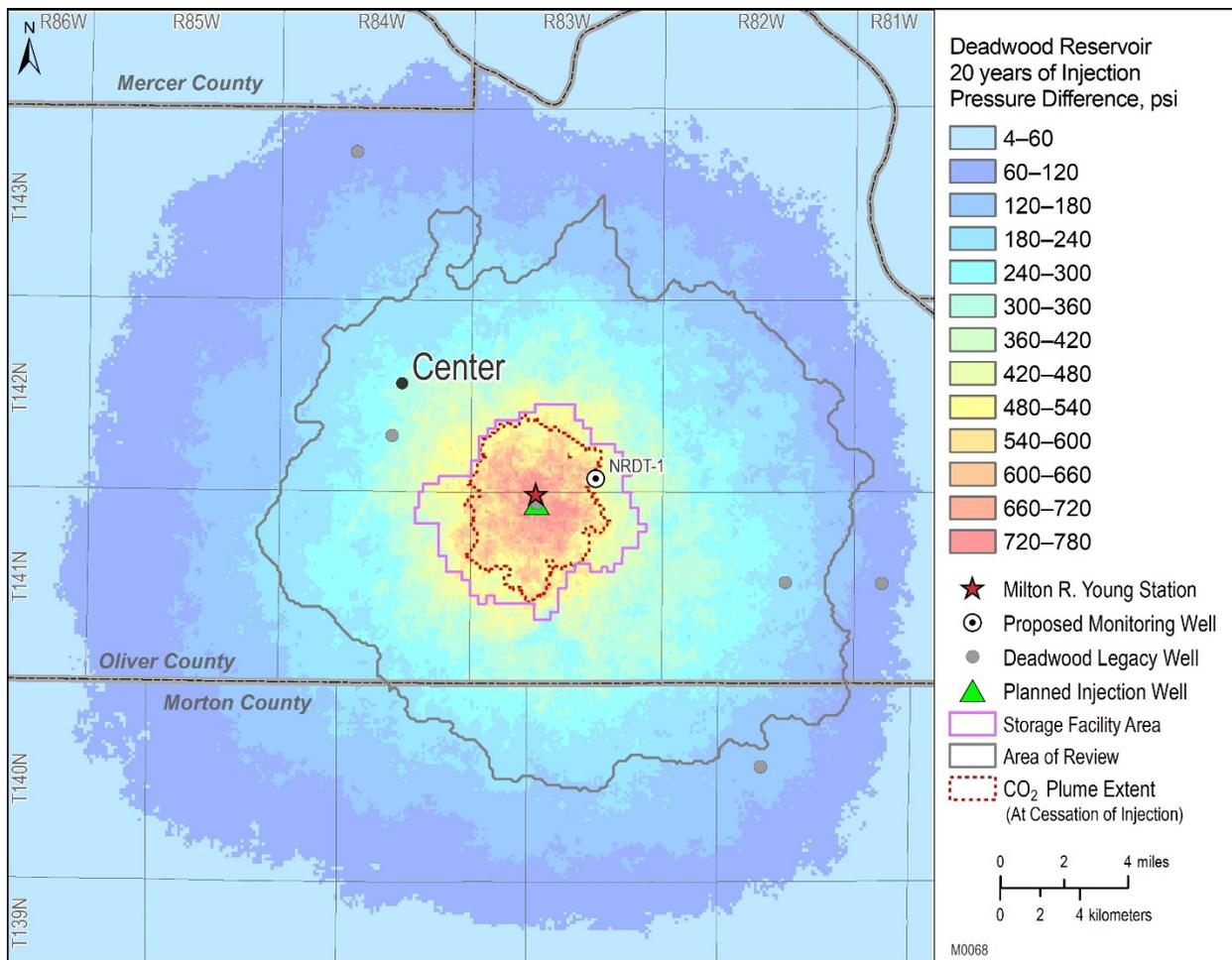


Figure 3-1. Pressure map showing the subsurface pressure influence associated with CO₂ injection in the Deadwood Formation. Shown is the CO₂ plume extent after 20 years of injection, storage facility area, and AOR boundary in relation to the subsurface pressure influence. Subsurface pressure subsides at the cessation of injection.

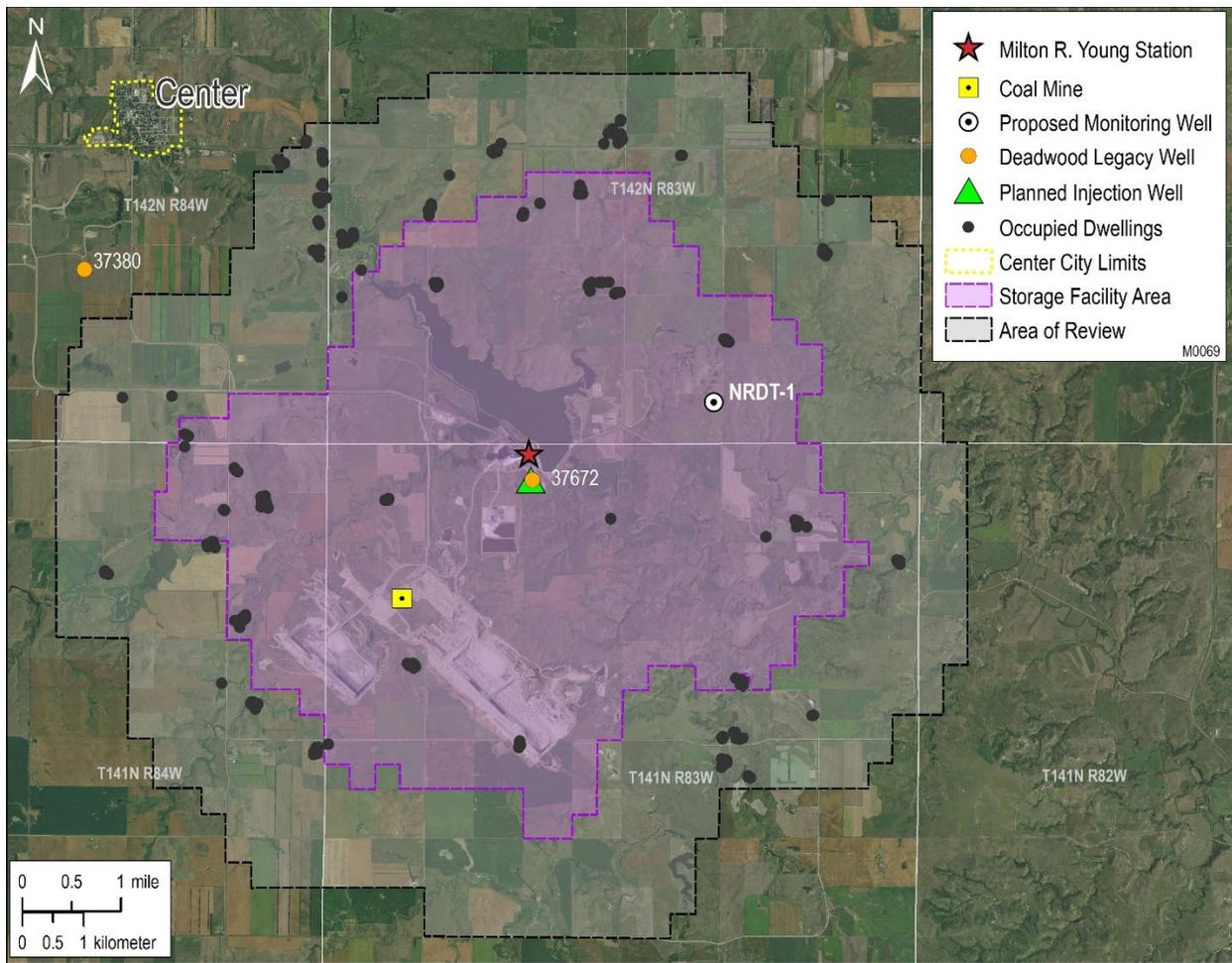


Figure 3-2. Final AOR map showing the storage facility area and AOR boundaries. The black circles represent occupied dwellings, and yellow boundaries represent buildings.

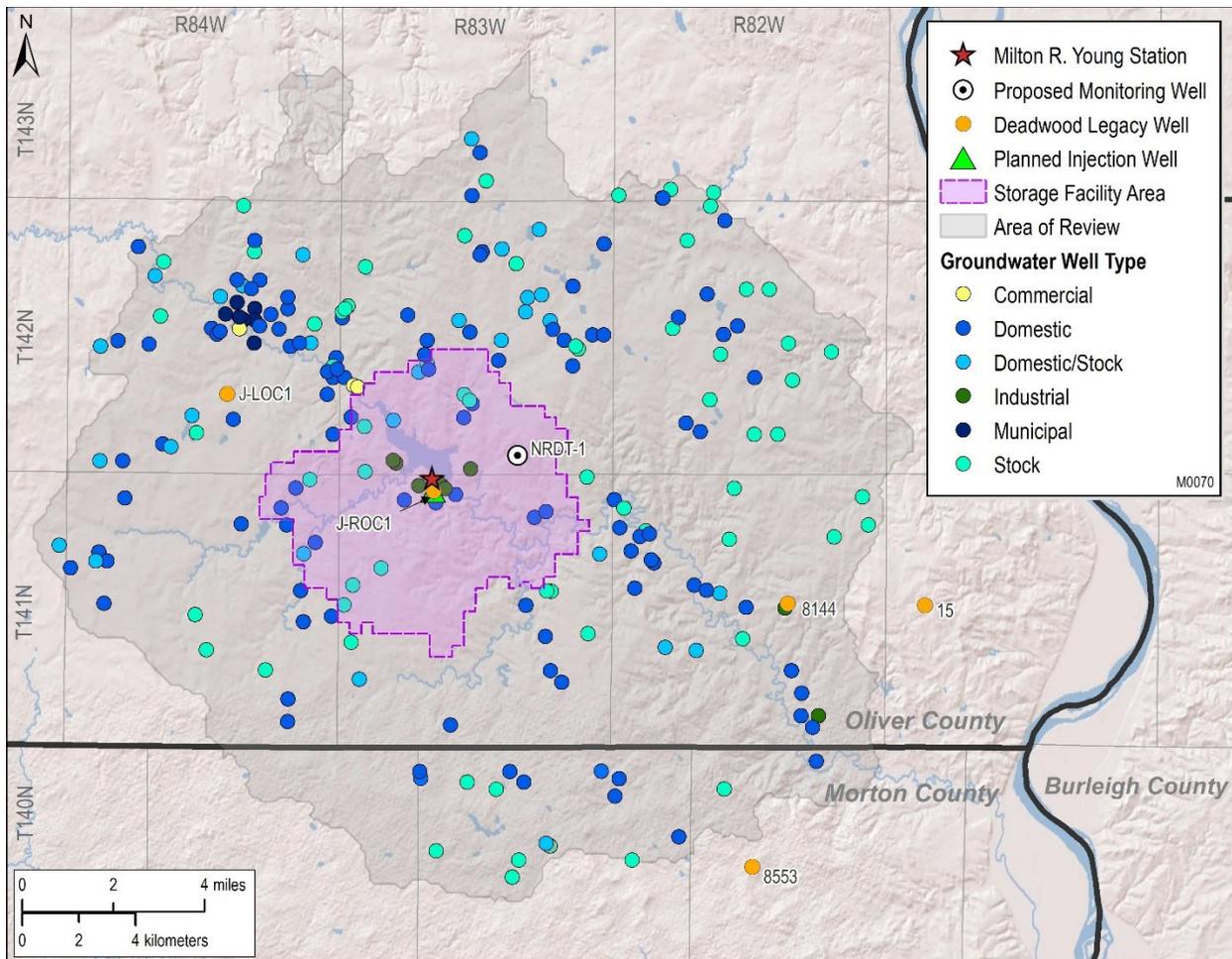


Figure 3-3. AOR map in relation to nearby legacy wells and groundwater wells. Shown are the storage facility area and AOR boundaries.

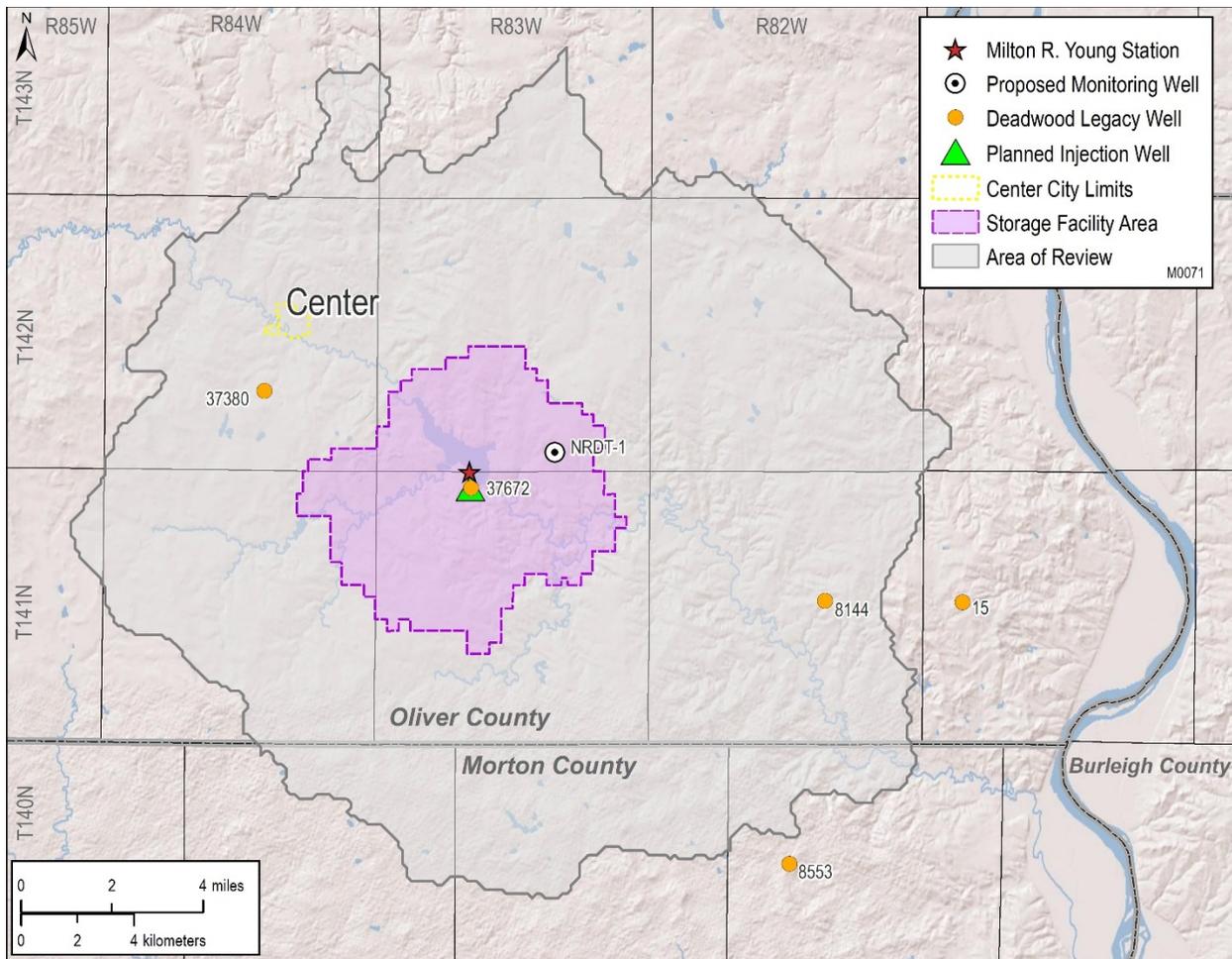


Figure 3-4. The AOR map in relation to nearby legacy wells. Shown are the storage facility area (purple boundary), Center city limits (yellow dotted boundary), and AOR (gray boundary). Orange circles represent nearby legacy wells near the project area, including within the AOR.

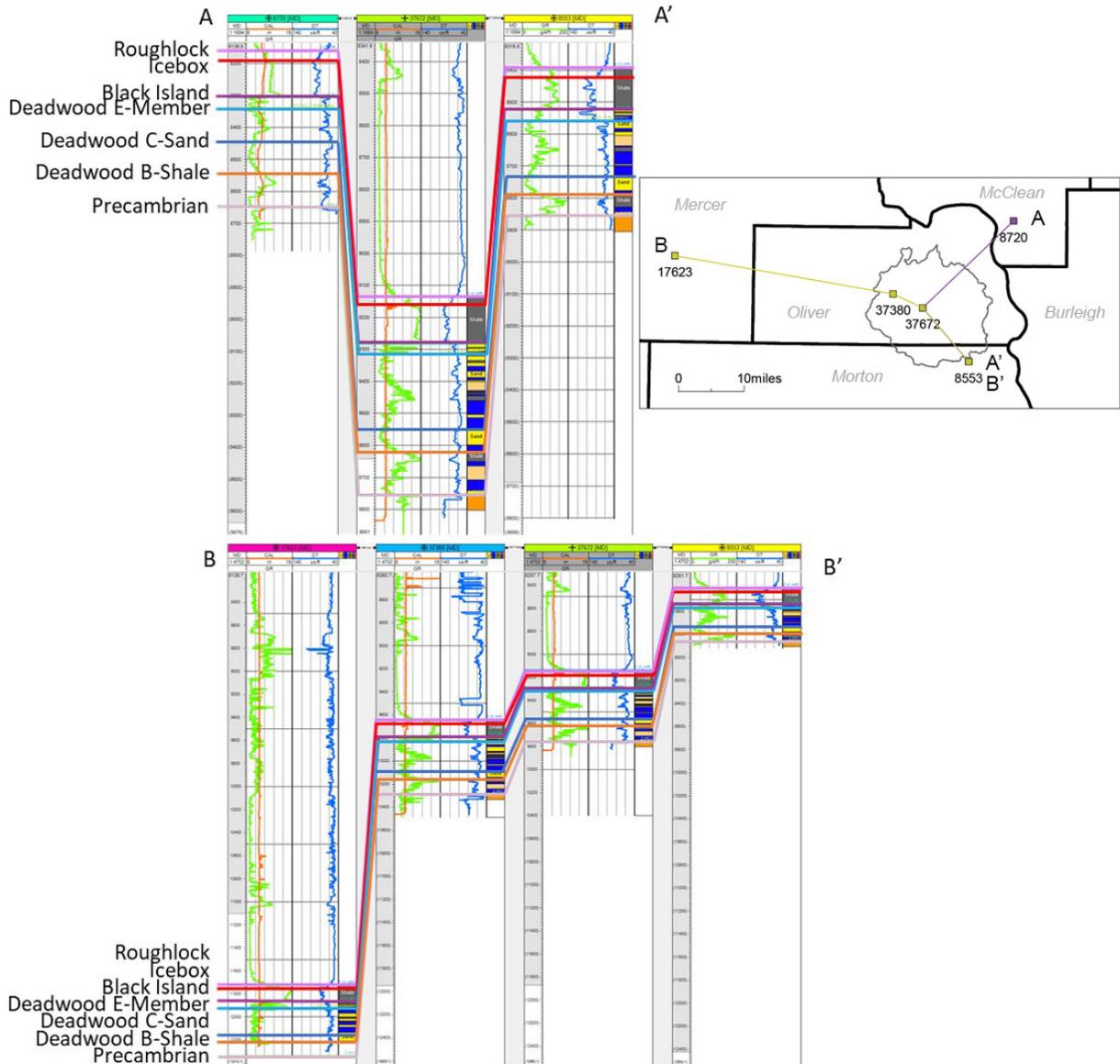


Figure 3-5. Regional well log cross sections showing the structure of the Roughlock, Icebox, Black Island, and Deadwood Formations and the Precambrian basement with an inset map demonstrating the location of the J-LOC1 and J-ROC1 wells. Logs displayed in tracks from left to right are 1) gamma ray (GR, green) and caliper (orange) and 2) delta time (blue), and 3) interpreted lithology log.

Table 3-1. Investigated and Identified Surface and Subsurface Features (Figures 3-1 through 3-5)

Surface and Subsurface Features	Investigated and Identified (Figures 3-1 through 3-5)	Investigated But Not Found in AOR
Producing (active) Wells		X
Abandoned Wells	X	
Plugged Wells or Dry Holes	X	
Deep Stratigraphic Boreholes	X	
Subsurface Cleanup Sites		X
Surface Bodies of Water	X	
Springs	X	
Water Wells	X	
Mines (surface and subsurface)	X	
Quarries		X
Subsurface Structures (e.g., coal mines)	X	
Location of Proposed Wells	X	
*Location of Proposed Cathodic Protection Boreholes	X	
Any Existing Aboveground Facilities		X
Roads	X	
State Boundary Lines		X
County Boundary Lines	X	
Indian Boundary Lines		X
**Other Pertinent Surface Features	X	

* Cathodic protection is planned with location TBD.

** Center, North Dakota, city limit boundary.

3.2 Corrective Action Evaluation

Table 3-2. Wells in AOR Evaluated for Corrective Action

NDIC ¹ Well File No.	Operator	Well Name	Spud Date	Surface Casing OD, in,	Surface Casing Seat, ft	Long-String Casing, in.	Hole Direction	TD, ² ft	TVD, ³ ft	Status	Plug Date	TWN	RNG	Section	Qtr/Qtr	County	Corrective Action Needed
8144	Pennzoil Co.	Little Boot 15-44	2/14/1981	8.625	2,014	Openhole	Vertical	8,655	8,655	P&A	4/1/1981	141 N	82 W	15	SE/SE	Oliver	No
37672	Minnkota Power Cooperative, Inc. (Minnkota)	J-ROC1	9/8/2020	13.375	2,000	Openhole	Vertical	9,871	9,871	TA	10/27/2020	141 N	83 W	4	SW/NW	Oliver	No
37380	Minnkota	J-LOC1	5/14/2020	9.625	1,654	5.5	Vertical	10,470	10,470	TA	12/19/2020	141 N	83 W	27	SW/NE	Oliver	No

¹ North Dakota Industrial Commission.

² Total depth.

³ True vertical depth.

Table 3-3. Little Boot 15-44 (NDIC File No. 8144) Well Evaluation

Well Name: Little Boot 15-44 (NDIC File No. 8144)

3-9

Cement Plugs				
Number	Interval (ft)		Thickness (ft)	Volume (sacks)
1	8,500	8,600	100	35
2	7,720	7,820	100	35
3	7,200	7,300	100	35
4	6,500	6,600	100	35
5	5,450	5,550	100	35
6	5,050	5,150	100	35
7	4,300	4,500	200	100
8	1,587	2,800	1,213	424
9	2	12	10	10

Formation		Cement Plug Remarks
Name	Estimated Top (ft)	
Pierre	1,375	Cement Plug 9 isolates the surface.
8 5/8" Casing Shoe	2,014	Cement Plug 8 isolates the surface casing shoe and above the Mowry Formation.
Greenhorn	2,803	
Mowry	3,177	Cement Plug 7 isolates below the Mowry and Inyan Kara Formations
Inyan Kara	3,434	
Swift	3,651	
Rierdon	4,038	
Broom Creek	4,400	Cement Plug 7 isolates above the Broom Creek Formation.
Kibbey Lime	5,051	
Icebox	8,440	Cement Plug 2 isolates above the Icebox and Deadwood Formations.
Deadwood	8,587	Cement Plug 1 isolates above the Deadwood Formation.

Spud Date: 2/14/1981
 Total Depth: 8,655 ft (Deadwood Formation)

Surface Casing:
 8 5/8" 36# K-55 casing set at 2,014 ft, cement to surface with 935 sacks Class G cement.

Openhole P&A

Corrective Action: No corrective action is necessary. The Deadwood Formation is isolated mechanically by a series of balanced cement plugs and is located near the outside edge of the AOR. Monitoring at this location may be necessary depending on actual plume growth.

Table 3-4. J-ROC1 (NDIC File No. 37672) Well Evaluation

Well Name: J-ROC1 (NDIC File No. 37672)

Cement Plugs				
Number	Interval (ft)		Thickness (ft)	Volume (sacks)
1	9,030	9,375	345	241
2	7,830	8,550	720	212
3	7,361	7,830	469	272
4	6,516	7,200	684	241
5	5,215	5,600	385	147
6	4,430	4,770	340	160
7	3,400	3,715	315	145
8	1,715	2,050	335	221
9	28	90	62	46

Formation		Cement Plug Remarks
Name	Wireline Top (ft)	
Pierre	1,150	Cement Plug 9 isolates the surface.
13 ³ / ₈ " Casing Shoe	2,000	Cement Plug 8 isolates the surface casing shoe.
Mowry	3,404	Cement Plug 7 isolates above the Inyan Kara Formation.
Inyan Kara	3,686	
Swift	3,865	
Spearfish/Opeche	4,688	Cement Plug 6 isolates above the Broom Creek and Spearfish/Opeche Formations.
Broom Creek	4,740	
Amsden	4,974	
Icebox	9,170	Cement Plug 1 isolates above the Deadwood Formation and is CO ₂ -resistant.
Deadwood	9,316	
Precambrian	9,762	

Spud Date: 9/8/2020
 Total Depth: 9,871 ft (Precambrian Basement)

Surface Casing:
 13³/₈" 61# K-55 casing set at 2,000 ft, cement to surface with 1,207 sacks Class C cement.

Openhole TA

Corrective Action: No corrective action is necessary. The Deadwood Formation is isolated mechanically by a series of conventional and CO₂-resistant balanced cement plugs. Minnkota plans to convert this well into an injection well named Liberty-1 (J-ROC1 NDIC File No. 37672).

Table 3-5. J-LOC1 (NDIC File No. 37380) Well Evaluation

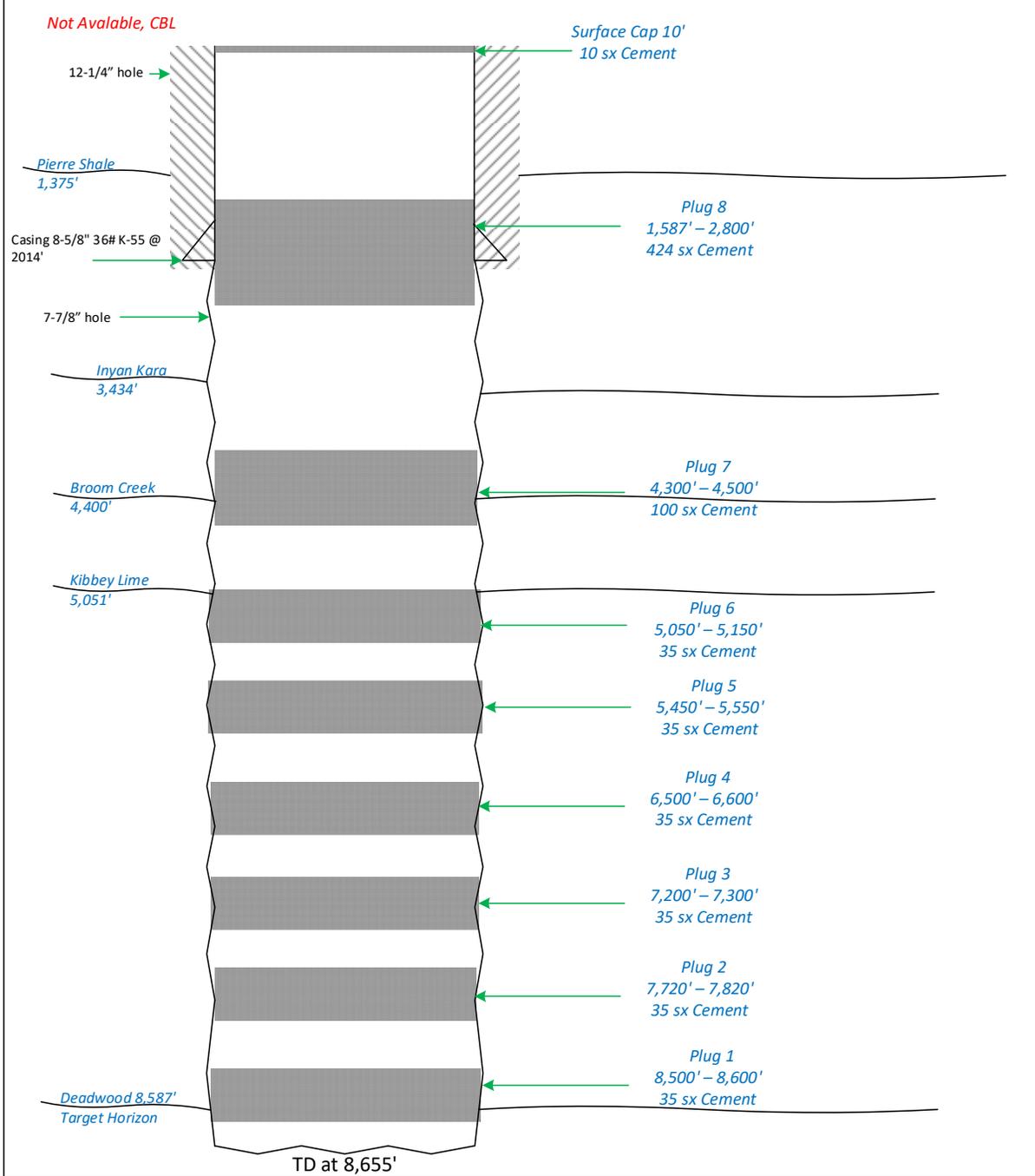
Well Name: J-LOC1 (NDIC File No. 37380)				
Casing Program				
Section	Casing Outside Diameter (OD), in.	Weight, lb/ft	Casing Seat, ft	Grade
Surface	9 ⁵ / ₈	40	1,654	K-55
Production	5 ¹ / ₂	23	10,450	L-80
				13Cr-95
Cementing Program				
Casing, in.	Cement Type	TOC, ft	Excess, %	Volume, sacks
9 ⁵ / ₈	Class C	Surface	100	728
5 ¹ / ₂	Class G	2,920	100	1,160
	CO ₂ - resistant	4,952		
Completion/Plugging Program				
Item	Description	Length (ft)	Top Depth (ft)	
1	Wireline bailed cement	50	3,929	
2	2AA CICR	1.73	3,979	
3	Perforation	10	4,015	
4	2AA CIBP	1.5	4,069	
5	Wireline bailed cement	50	4,846	
6	2AA CICR	1.73	4,896	
7	Perforation	10	4,912	
8	Wireline bailed cement	50	9,782	
9	2AA CICR	1.73	9,832	
10	Perforation	10	9,880	
Spud Date: 5/14/2020				
Total Depth: 10,470 ft (Precambrian Basement)				
Cased-hole TA				

Formation		Remarks
Name	Wireline Top (ft)	
Pierre	1,250	Surface and production casing and cement behind both strings isolate the surface section.
9 ⁵ / ₈ " Casing Shoe	1,654	
Mowry	3,585	Production casing, cement behind the casing, cast iron bridge plug, cast iron cement retainer (CICR), and cement above isolate the Inyan Kara Formation.
Inyan Kara	3,881	
Swift	4,057	
Opeche	4,879	Production casing, CO ₂ -resistant cement behind the casing, CICR and cement above isolate the Broom Creek Formation.
Broom Creek	4,906	
Amsden	5,210	Production casing, CO ₂ -resistant cement behind the casing, CICR and cement above isolate the Deadwood Formation.
Icebox	9,665	
Deadwood	9,821	
Precambrian	10,297	

Corrective Action: No corrective action is necessary. The Deadwood Formation is isolated mechanically by conventional and CO₂-resistant casing and cement. Perforations in the Deadwood, Broom Creek, and Inyan Kara are isolated by CICRs and cement on top. A mechanical integrity test (MIT) was witnessed and approved by North Dakota State Inspector, Jared Thune, on December 21, 2020.

LITTLE BOOT 15-44

NDIC Well File No. 8144



Note:

- * Class G cement was used for the cement plug
- * Cement yield is 1.15 cuft/sack, all plugs has the same yield value

Not to scale

Figure 3-6. Little Boot 15-44 (NDIC File No. 8144) well schematic showing the location and thickness of cement plugs.

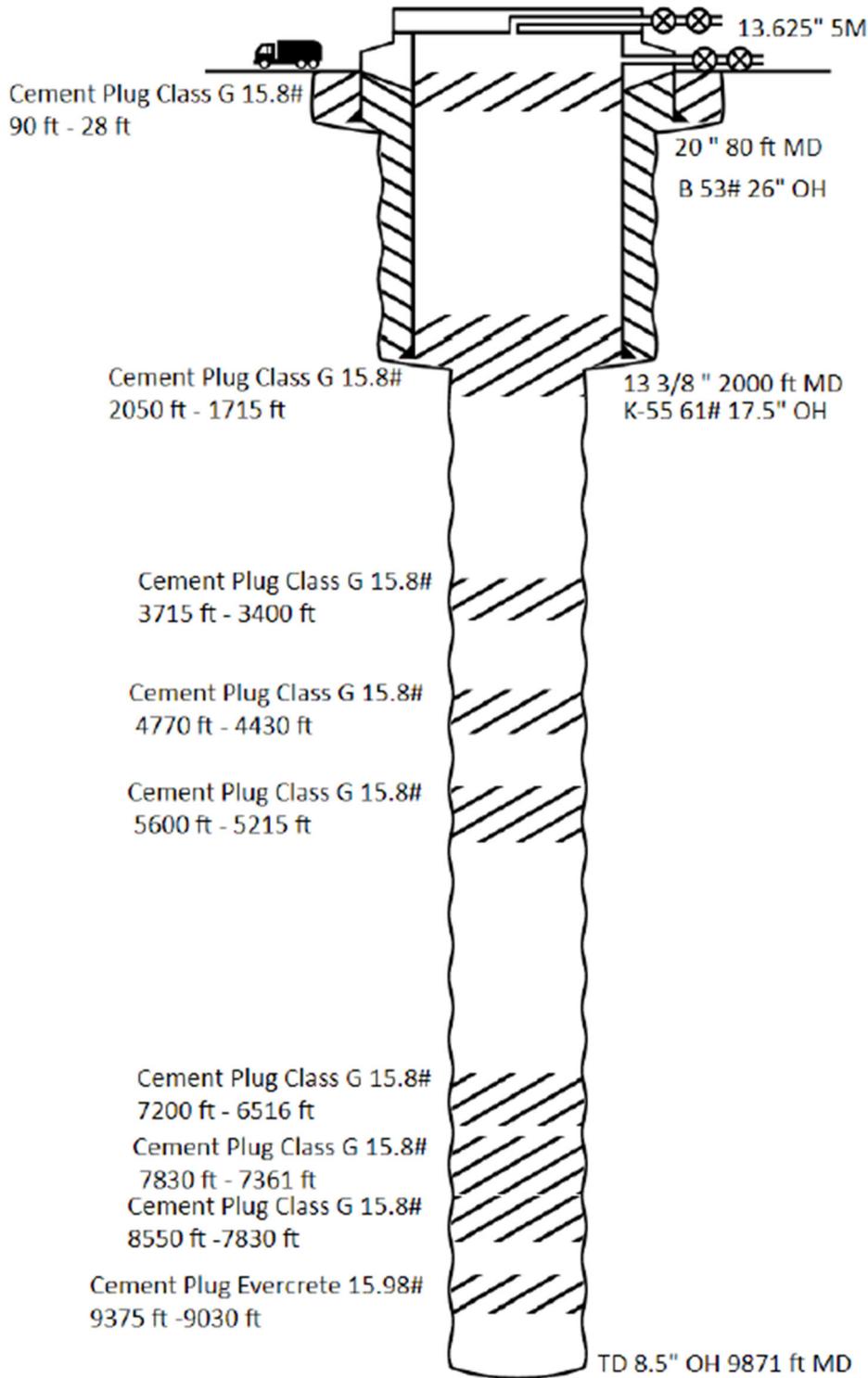


Figure 3-7. J-ROC1 (NDIC File No. 37672) well schematic showing the location and thickness of cement plugs.

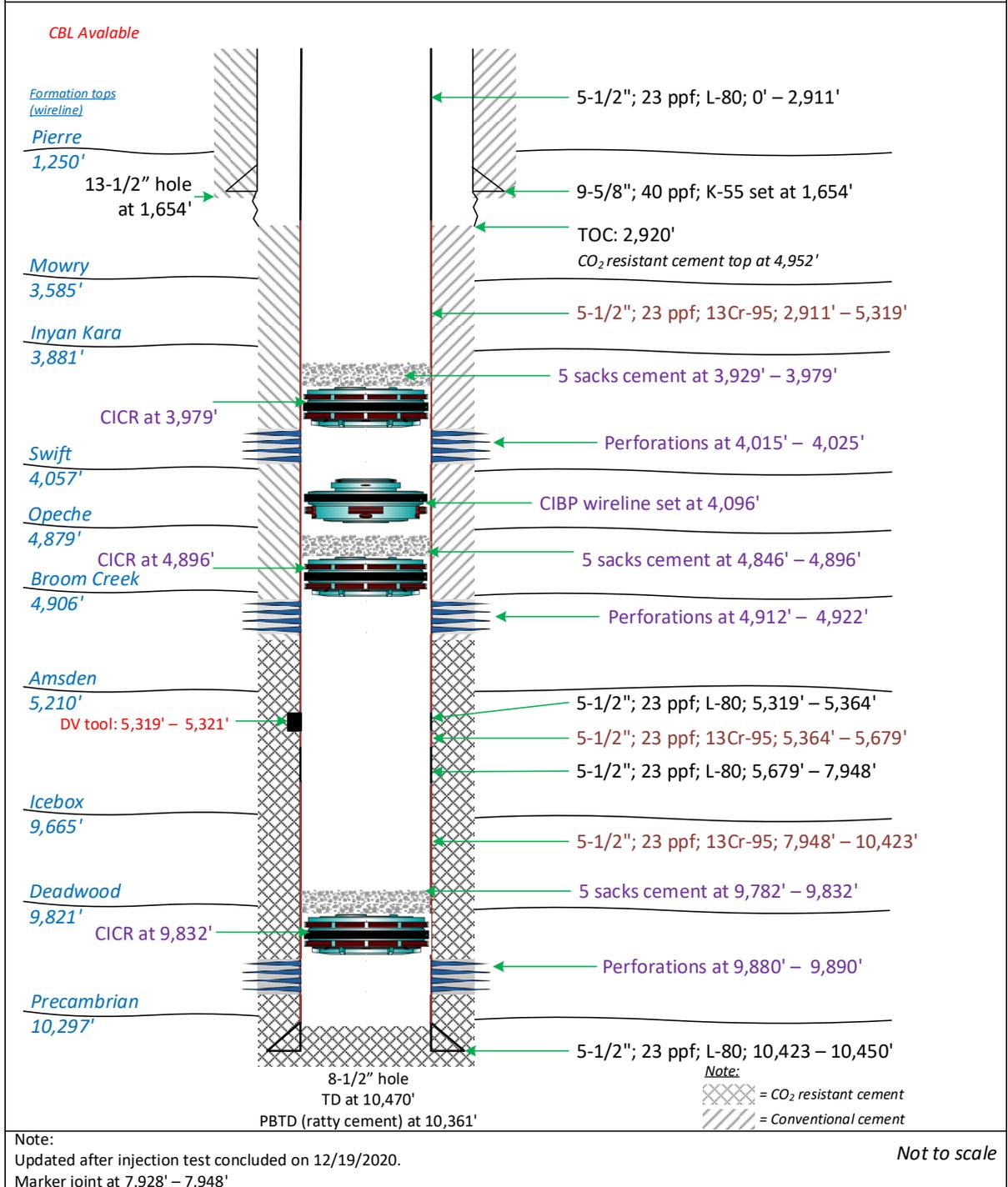


Figure 3-8. J-LOC1 (NDIC File No. 37380) as-constructed well schematic showing the final installation equipment used inside the wellbore to isolate perforations.

3.3 Reevaluation of AOR and Corrective Action Plan

Minnkota will periodically reevaluate the AOR and corrective action plan in accordance with NDAC § 43-05-01-05.1, with the first reevaluation taking place not later than the fifth anniversary of NDIC's issuance of a permit to operate under NDAC § 43-05-01-10 and every fifth anniversary thereafter (each being a Reevaluation Date). The AOR reevaluations will address the following:

- Any changes to the monitoring and operational data prior to the scheduled Reevaluation Date.
- Monitoring and operational data (e.g., injection rate and pressure) will be used to update the geologic model and computational simulations. These updates will then be used to inform a reevaluation of the AOR and corrective action plan, including the computational model that was used to determine the AOR, and operational data to be utilized as the basis for that update will be identified.
- The protocol to conduct corrective action, if necessary, will be conducted, including 1) what corrective action will be performed and 2) how corrective action will be adjusted if there are changes in the AOR.

3.4 Protection of USDWs

3.4.1 Introduction of USDW Protection

The primary confining zone and additional overlying confining zones geologically isolate the Fox Hills Formation, the deepest USDW in the AOR. The Icebox Formation is the primary confining zone with additional confining layers above, which geologically isolates all USDWs from the injection zone (Table 3-6).

3.4.2 Geology of USDW Formations

The hydrogeology of western North Dakota comprises several shallow freshwater-bearing formations of the Quaternary, Tertiary, and upper Cretaceous-aged sediments underlain by multiple saline aquifer systems of the Williston Basin (Figure 3-9). These saline and freshwater systems are separated by the Cretaceous Pierre Shale of the Williston Basin, a regionally extensive shale between 1000 and 1500 ft thick (Thamke and others, 2014).

The freshwater aquifers comprise the Cretaceous Fox Hills and Hell Creek Formations; overlying Cannonball, Tongue River, and Sentinel Butte Formations of Tertiary Fort Union Group; and the Tertiary Golden Valley Formation (Figure 3-10). Above these are undifferentiated alluvial and glacial drift Quaternary aquifer layers, which are not necessarily present in all parts of the AOR (Croft, 1973).

Table 3-6. Description of Zones of Confinement above the Immediate Upper Confining Zone (data based on the J-ROC1 well)

Name of Formation	Lithology	Formation Top Depth, ft	Thickness, ft	Depth below Lowest Identified USDW, ft
Pierre	Shale	1,150	1862	0
Greenhorn	Shale	3,012	391	1,862
Mowry	Shale	3,403	56	2,253
Skull Creek	Shale	3,458	235	2,308
Swift	Shale	3,864	473	2,714
Rierdon	Shale	4,337	147	3,187
Piper (Kline Member)	Limestone	4,484	110	3,334
Piper (Picard)	Shale	4,594	91	3,444
Opeche	Shale/mudstone	4,685	55	3,535
Amsden	Dolostone/anhydrite	4,974	247	3,824
Kibbey Lime	Limestone	5,384	31	4,234
Charles	Limestone/anhydrite	5,526	147	4,376
Bakken	Shale	6,926	10	5,776
Birdbear	Limestone	7,075	74	5,925
Duperow	Limestone/dolostone	7,149	272	5,999
Souris River	Dolostone/limestone	7,421	175	6,271
Dawson Bay	Dolostone	7,596	729	6,446
Gunton	Dolostone/limestone	8,325	39	7,175
Stoughton	Shale/limestone	8,364	91	7,214
Lower Red River	Limestone	8,645	488	7,495
Roughlock	Shale/limestone	9,133	25	7,983

The lowest USDW in the AOR is the Fox Hills Formation, which together with the overlying Hell Creek Formation, is a confined aquifer system. The Hell Creek Formation is a poorly consolidated unit composed of interbedded sandstone, siltstone, and claystones with occasional carbonaceous beds, all fluvial origin. The underlying Fox Hills Formation is interpreted as interbedded nearshore marine deposits of sand, silt, and shale deposited as part of the final Western Interior Seaway retreat (Fischer, 2013). The Fox Hills Formation in the AOR is approximately 700 to 900 ft deep and 200 to 350 ft thick. The structure of the Fox Hills and Hell Creek Formations follows that of the Williston Basin, dipping gently toward the center of the basin to the northwest of the AOR (Figure 3-11).

The Pierre Shale is a thick, regionally extensive shale unit, which forms the lower boundary of the Fox Hills–Hell Creek system, also isolating all overlying freshwater aquifers from the deeper saline aquifer systems. The Pierre shale is a dark gray to black marine shale and is typically 1000 ft thick in the AOR (Thamke and others, 2014).

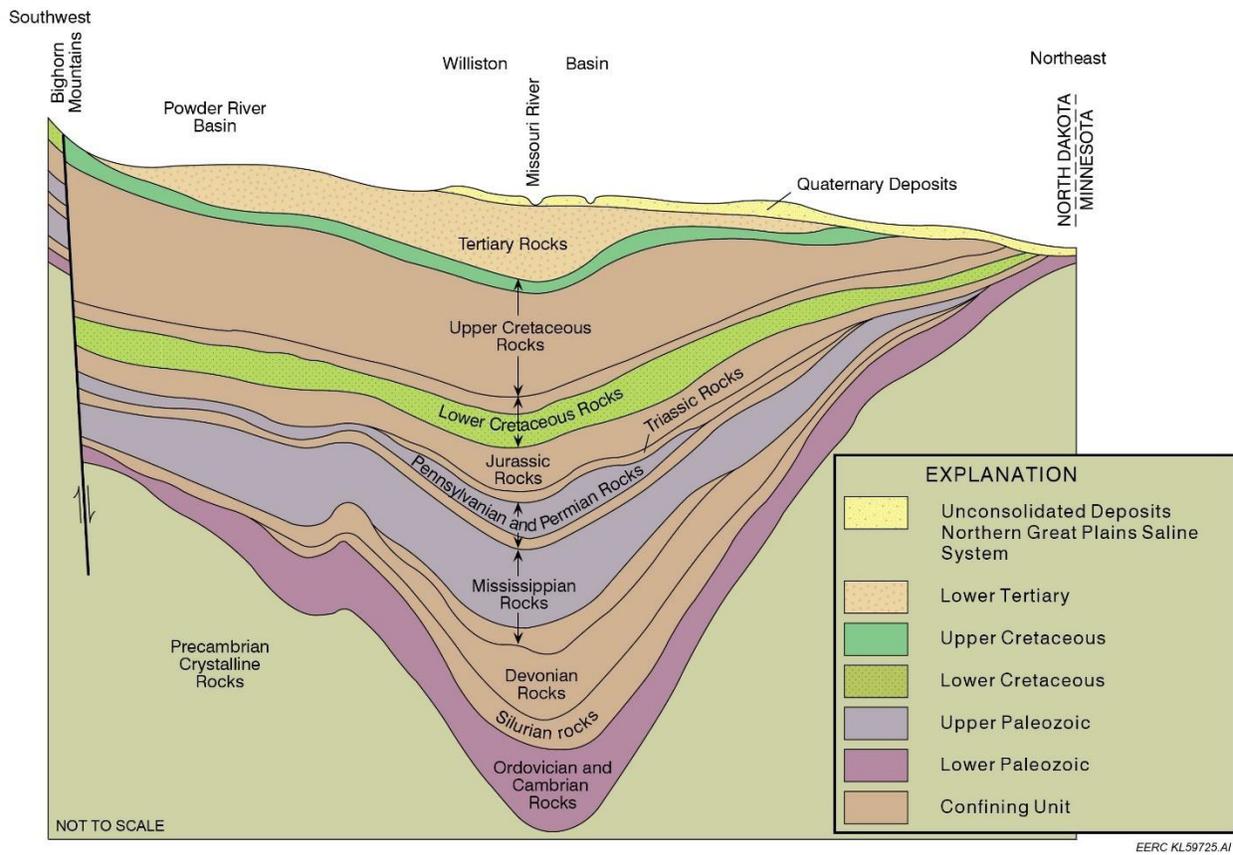


Figure 3-9. Major aquifer systems of the Williston Basin.

Era	Period	Group	Formation	Freshwater Aquifer(s) Present
Cenozoic	Quaternary		Glacial Drift	Yes
	Tertiary		Golden Valley	Yes
		Fort Union	Sentinel Butte	Yes
			Tongue River	Yes
			Cannonball	Yes
Mesozoic	Cretaceous		Hell Creek	Yes
			Fox Hills	Yes
			Pierre	No
		Colorado	Niobrara	No
			Carlile	No
			Greenhorn	No
			Belle Fourche	No

Figure 3-10. Upper stratigraphy of Oliver County showing the stratigraphic relationship of Cretaceous and Tertiary groundwater-bearing formations (modified from Croft, 1973).

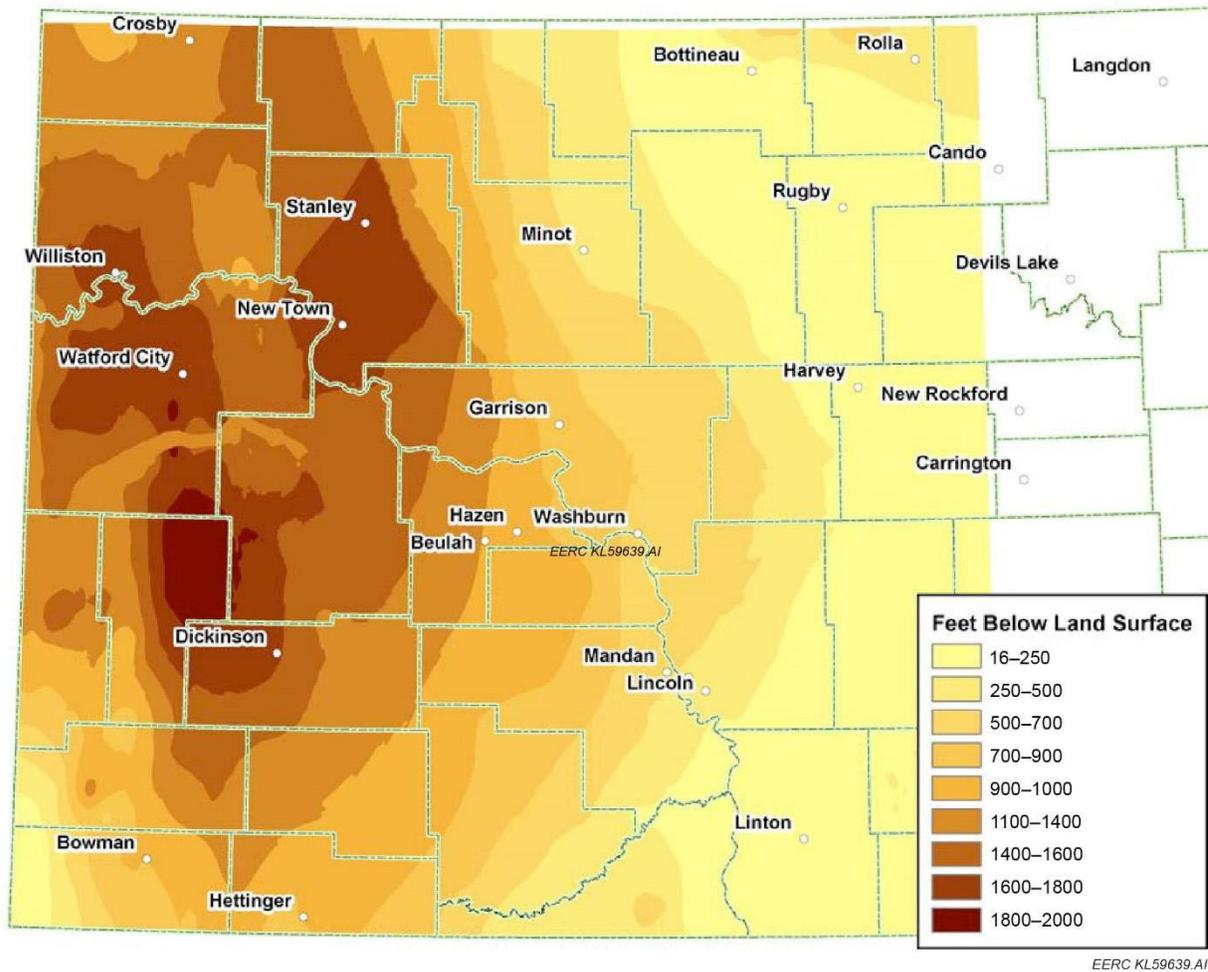


Figure 3-11. Depth to surface of the Fox Hills Formation in western North Dakota (Fischer, 2013).

3.4.3 Hydrology of USDW Formations

The aquifers of the Fox Hills and Hell Creek Formations are hydraulically connected and function as a single confined aquifer system (Fischer, 2013). The Bacon Creek Member of the Hell Creek Formation forms a regional aquitard for the Fox Hills–Hell Creek aquifer system, which isolates it from the overlying aquifer layers. Recharge for the Fox Hills–Hell Creek aquifer system occurs in southwestern North Dakota along the Cedar Creek Anticline and discharges into overlying strata under central and eastern North Dakota (Fischer, 2013). Flow through the AOR is to the east (Figure 3-12). Water sampled from the Fox Hills Formation is a sodium bicarbonate type with a total dissolved solids (TDS) content of approximately 1,500–1,600 ppm. Previous analysis of Fox Hills Formation water has also noted high levels of fluoride, more than 5 mg/L (Trapp and Croft, 1975). As such, the Fox Hills–Hell Creek system is typically not used as a primary source of drinking water. However, it is occasionally produced for irrigation and/or livestock watering.

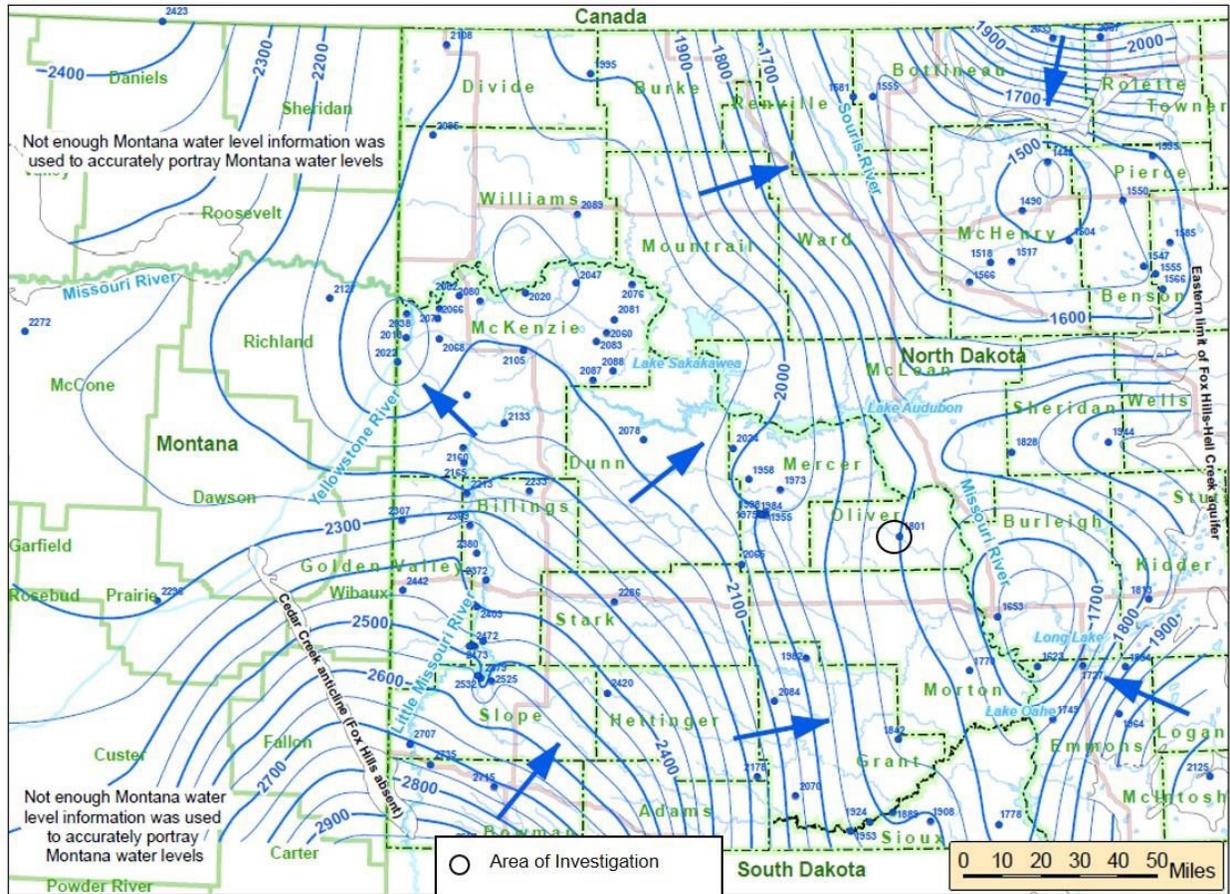


Figure 3-12. Potentiometric surface of the Fox Hills–Hell Creek aquifer system shown in feet of hydraulic head above sea level. Flow is to the northeast through the area of investigation in central Oliver County (modified from Fischer, 2013).

Based on the North Dakota State Water Commission (SWC) database, eight water wells penetrate the Fox Hills Formation in the AOR (Figure 3-13). One observation well monitored by the U.S. Geological Survey is located 1 mi east of Center, North Dakota, nearly 5 mi northwest of the McCall-1 injection site. One well is 5 mi northeast of the injection site along North Dakota Highway 25 and is used for stock. The status of the remaining six wells is under investigation. One well is about 9 mi southeast of the injection site near a legacy oil exploratory well and is permitted as an industrial well. Five wells lie to the southwest. Three wells are about 3, 11, and 12 mi from the injection site and are permitted as domestic water supply. The last two wells are located on adjacent sections 11 mi from the injection site; one is permitted for stock, and the other’s purpose is unknown.

Multiple other freshwater-bearing units, primarily of Tertiary age, overlie the Fox Hills–Hell Creek aquifer system in the AOR (Figure 3-14). These formations are often used for domestic and agricultural purposes. The Cannonball and Tongue River Formations comprise the major aquifer units of the Fort Union Group, which overlies the Hell Creek Formation. The Cannonball Formation consists of interbedded sandstone, siltstone, claystone, and thin lignite beds of marine

origin. The Tongue River Formation is predominantly sandstone interbedded with siltstone, claystone, lignite, and occasional carbonaceous shales. The basal sandstone member of the Tongue River is persistent and a reliable source of groundwater in the region. The thickness of this basal sand ranges from approximately 200 to 500 ft and directly underlies surficial glacial deposits in the area of investigation. Tongue River groundwaters are generally a sodium bicarbonate type with a TDS of approximately 1,000 ppm (Croft, 1973).

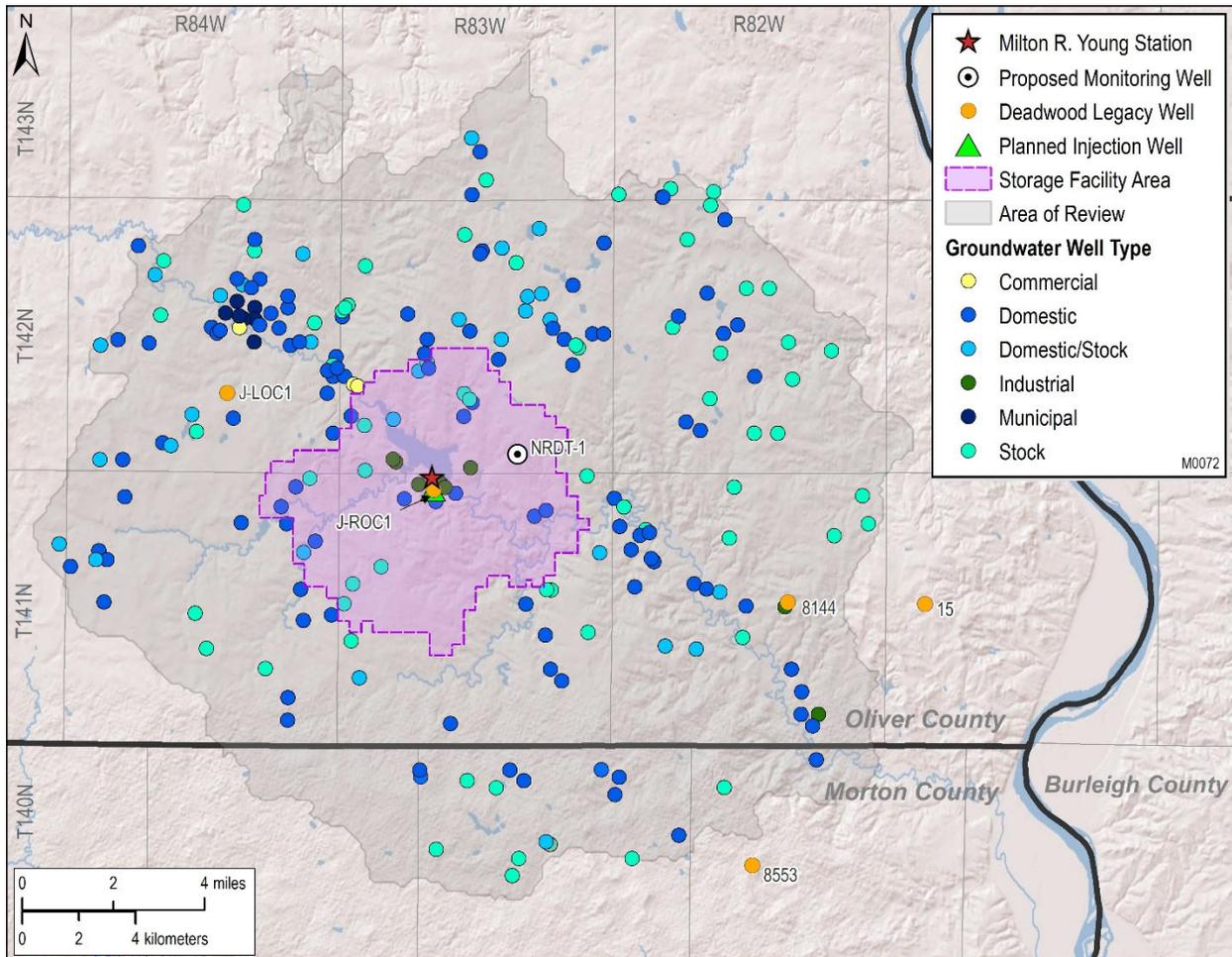


Figure 3-13. Map of water wells in the AOR in relation to the McCall-1 planned injection well, the NRDT-1 proposed monitoring well, storage facility area, AOR, and legacy oil and gas wells.

The Sentinel Butte Formation, a silty fine-to-medium-grained sandstone with claystone and lignite interbeds, overlies the Tongue River Formation in the extreme western portion of the AOR. The Sentinel Butte Formation is predominantly sandstone with lignite interbeds. While the Sentinel Butte Formation is another important source of groundwater in the region, primarily to the west of the AOR, the Sentinel Butte is not a source of groundwater within the AOR. TDS in the Sentinel Butte Formation range from approximately 400–1,000 ppm (Croft, 1973).

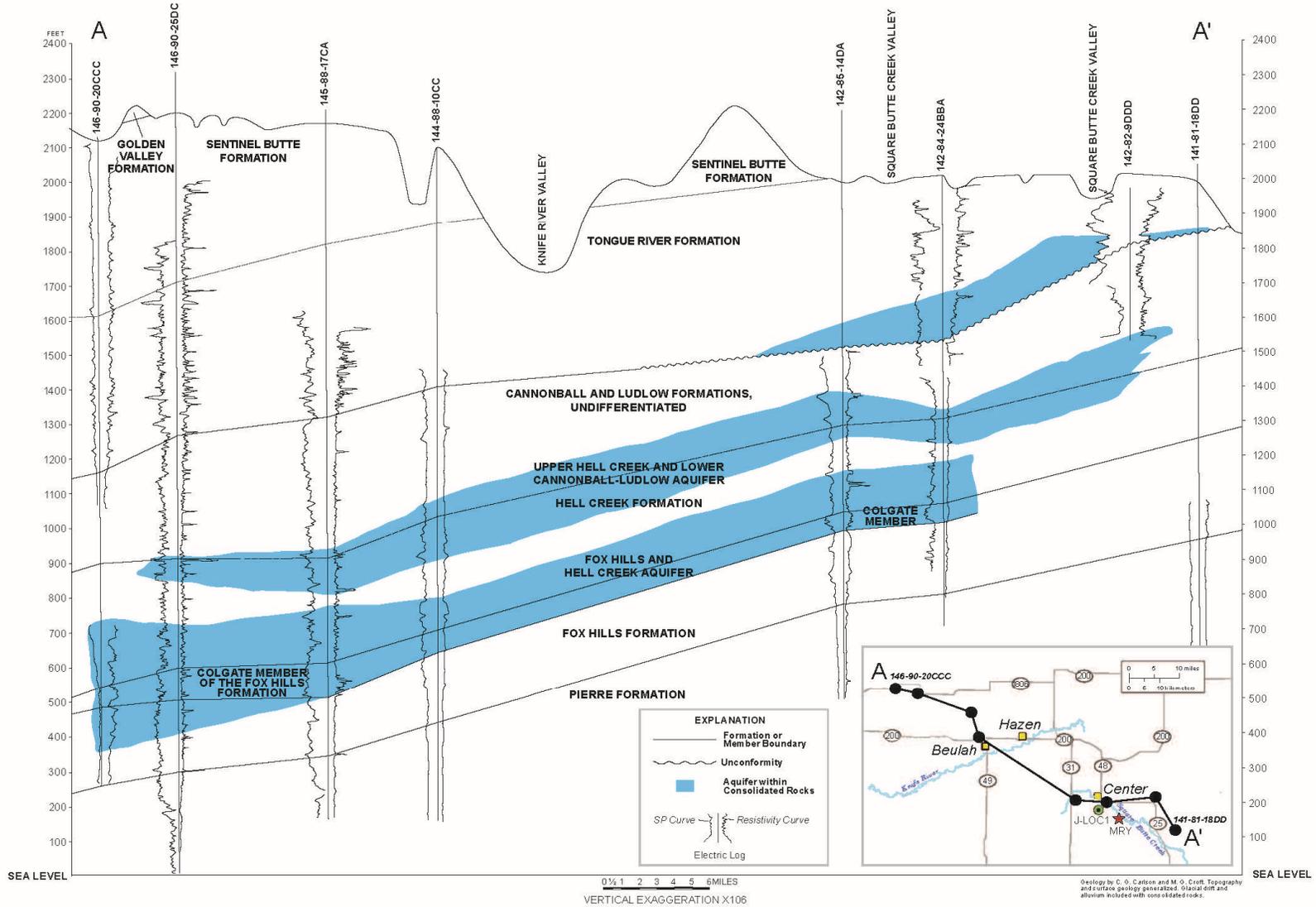


Figure 3-14. West–east cross section of the major regional aquifer layers in Mercer and Oliver Counties and their associated geologic relationships (modified from Croft, 1973). The black dots on the inset map represent the locations of the water wells illustrated on the cross section.

3.4.4 Protection for USDWs

The Fox Hills–Hell Creek aquifer system is the lowest USDW in the AOR. The injection zone (Deadwood Formation) and lowest USDW (Fox Hills–Hell Creek aquifer system) are isolated geologically and hydrologically by multiple impermeable rock layers consisting of shale and carbonate formations of Ordovician, Silurian, Devonian, Carboniferous, Permian, Jurassic, and Cretaceous ages (Figure 3-9). The primary seal of the injection zone is the Ordovician-aged Icebox Formation with shales of the Ordovician-aged Roughlock and Stoughton, Mississippian–Devonian-aged Bakken, Permian-aged Opeche, Jurassic-aged Piper (Picard), Rierdon, and Swift Formations, all of which overlie the Icebox Formation. Above the Swift is the confined saltwater aquifer system of the Inyan Kara Formation, which extends across much of the Williston Basin. The Inyan Kara Formation will be monitored for temperature and pressure changes via fiber optic lines installed in the injection well, McCall-1 and the NRDT-1 monitoring well. Above the Inyan Kara Formation are the Cretaceous-aged shale formations, which are named the Skull Creek, Mowry, Belle Fourche, Greenhorn, Carlisle, Niobrara, and Pierre. The Pierre Formation is the thickest shale formation in the AOR and the primary geologic barrier between the USDWs and the injection zone. The geologic strata overlying the injection zone consist of multiple impermeable rock layers that are free of transmissive faults or fractures and provide adequate isolation of the USDWs from CO₂ injection activities in the AOR.

3.5 References

- Croft, M.G., 1973, Ground-water resources of Mercer and Oliver Counties, North Dakota: U.S. Geological Survey, County Ground Water Studies – 15.
- Fischer, K., 2013, Groundwater flow model inversion to assess water availability in the Fox Hills–Hell Creek Aquifer: North Dakota State Water Commission Water Resources Investigation No. 54.
- Thamke, J.N., LeCain, G.D., Ryter, D.W., Sando, R., and Long, A.J., 2014, Hydrogeologic framework of the uppermost principal aquifer systems in the Williston and Powder River structural basins, United States and Canada: U.S. Geological Survey Groundwater Resources Program Scientific Investigations Report 2014-5047.
- Trapp, H., and Croft, M.G., 1975, Geology and ground water resources of Hettinger and Stark Counties North Dakota: U.S. Geological Survey, County Ground Water Studies – 16.

4.0 SUPPORTING PERMIT PLANS

The ten supporting plans of this permit application are listed in Table 4-1 and provided in this section of the application. To aid in the review of these plans, it should be noted that four monitoring-related plans (i.e., corrosion monitoring and prevention plan, surface leak detection and monitoring plan, subsurface leak detection and monitoring plan, and testing and monitoring plan) are presented under the single subsection entitled Testing and Monitoring Plan. The other plans are presented in their respective subsections.

Table 4-1. Supporting Plans for Permit Application

Testing and Monitoring Plan
Corrosion Monitoring and Prevention Plan*
Surface Leak Detection and Monitoring Plan*
Subsurface Leak Detection and Monitoring Plan*
Emergency and Remedial Response Plan
Financial Assurance Demonstration Plan
Worker Safety Plan
Well Casing and Cementing Plan
Plugging Plan
Postinjection Site Care and Facility Closure Plan

* These plans are presented under the heading Testing and Monitoring Plan (Section 4.1).

The development of several of the plans identified in Table 4-1 was informed by a screening-level risk assessment (SLRA) of the geologic storage project, which was performed in accordance with the international standard, ISO 31000 (Ayash, Azzolina, and Nakles, technical memorandum, February 12, 2020). The SLRA was conducted through a series of work group sessions involving subject matter experts (SMEs) that were held from May 2018 through April 2019. The technical experts were asked to review 18 individual technical project risks and four nontechnical risks and assign them a probability of occurrence and assess their potential impacts on cost, schedule, health and safety, environment, permitting/compliance, and corporate image/public relations.

The technical risks were grouped into the following six risk categories: 1) injectivity (three risks), 2) storage capacity (two risks); 3) subsurface containment – lateral migration of carbon dioxide (CO₂) or formation water brine (one risk); 4) subsurface containment – propagation of subsurface pressure plume (two risks); 5) subsurface containment – vertical migration of CO₂ or formation water brine via injection wells, plugged and abandoned wells, monitoring wells, or faults/fractures (nine risks); and 6) induced seismicity (one risk). The risk assessment results indicated that there were currently no potential risks that would prevent the storage complexes evaluated in the feasibility study from serving as commercial-scale geologic CO₂ storage sites. While the results of the SLRA indicated that there are no risks that would preclude the commercial deployment of the project, it identified a set of operational events with the potential for endangering underground sources of drinking water (USDWs) for future monitoring and provided the basis for the identification and costing of potential emergency response actions during the geologic storage operations.

Using this SLRA as a starting point, a team consisting of representatives of Oxy Permian Risk, Low Carbon Ventures (LCV) engineers, Minnkota personnel, Energy & Environmental Research Center (EERC) staff, and BNI Energy engineers met to conduct further risk assessment of Tundra SGS proposed design and operations. The purpose of this review was to identify potential hazards based on facility design and operation.

The risk assessment process used for Project Tundra was developed specifically for this project based on consultation and agreement of risk team members. The agreed-upon approach used a combination of evaluating impact and probability level for a variety of impact categories to determine the overall risk level. These steps are performed for each of the identified risk scenarios developed as discussed in more detail below.

A total of 38 scenarios associated with the facility operation were evaluated. Thirteen (13) scenarios were identified to have a Risk Level 4 or higher which may be equivalent to a medium level risk, the yellow range identified on the risk matrix (Section 6. Risk Matrix). However, the team did not define high, medium, or low risk based on risk score. Further discussion of costing and actions related to the monitoring approaches identified in this section are included in the financial assurance demonstration plan (FADP).

4.1 Testing and Monitoring Plan

An extensive monitoring, verification, and accounting (MVA) system will be implemented to verify that the Tundra SGS project is operating as permitted and is not endangering USDWs. The objectives of the MVA program are to proactively account for and verify the location of CO₂ injected. This MVA plan includes an analysis of the injected CO₂, periodic testing of the injection well, a corrosion-monitoring plan for the CO₂ injection well components, a leak detection and monitoring plan for surface components of the CO₂ injection system, and a leak detection plan to monitor any movement of the CO₂ outside of the storage reservoir. As such, this plan simultaneously meets the permit requirements for three other required plans: 1) corrosion-monitoring and prevention plan, 2) surface leak detection and monitoring plan, and 3) subsurface leak detection and monitoring plan.

The combination of the above monitoring efforts is used to verify that the geologic storage project is operating as permitted and protecting the USDWs. An overview of these individual monitoring efforts is provided in Table 4-2 along with the structure/project area that is being monitored.

Pursuant to North Dakota Administrative Code (NDAC) § 43-05-01-11.4 subsection 1j, “Periodic reviews of the testing and monitoring plan by the storage operator to incorporate monitoring data collected, operational data collected, and the most recent area of review reevaluation performed. The storage operator shall review the testing and monitoring plan at least once every five years.”

Table 4-2. Overview of Tundra SGS Monitoring Program for the Geologic Storage of CO₂

Monitoring Type	Tundra SGS Monitoring Program	Target Structure/ Project Area
Analysis of Injected CO ₂	Compositional and isotopic analysis of the injected CO ₂ stream	Upstream or downstream of the flowmeter
CO ₂ Flowline	Distributed temperature sensing (DTS)/distributed acoustic sensing (DAS) and distributed strain sensing (DSS)	Capture facility to the wellsite
Continuous Recording of Injection Pressure, Rate, and Volume	Surface pressure/temperature gauges and a flowmeter installed at the wellhead with shutoff alarms	Surface-to-reservoir (injection well)
Well Annulus Pressure Between Tubing and Casing	Annular pressure gauge for continuous monitoring	Surface-to-reservoir (injection well)
Near-Surface Monitoring	Groundwater wells in the area of review (AOR), dedicated Fox Hills monitoring well, and soil gas sampling and analyses	Near-surface environment, USDWs
Direct Reservoir Monitoring	Wireline logging, tubing-conveyed downhole pressure and temperature gauges, and casing-conveyed DTS (fiber optic)	Storage reservoir and primary sealing formation
Indirect Reservoir Monitoring	Time-lapse geophysical (seismic) surveys, inSAR ¹ and passive seismic measurements	Entire storage complex
Internal and External Mechanical Integrity	Tubing-casing annulus pressure testing (internal), casing integrity tools (i.e., USIT ²) (external)	Well infrastructure
Corrosion Monitoring	Flow-through corrosion coupon test system for periodic corrosion monitoring	Well infrastructure

¹ Interferometric synthetic aperture radar.

² Ultrasonic imager tool.

If needed, amendments to the testing and monitoring plan (i.e., technologies applied, frequency of testing, etc.) will be submitted for approval by the North Dakota Industrial Commission (NDIC). The results of pertinent analyses and data evaluations conducted as part of the monitoring program will be compiled and reported, as required. Another goal of this monitoring program is to establish preinjection baseline data for the storage complex, including baseline data for nearby groundwater wells, the Fox Hills Formation (deepest USDW), and soil gas.

Additional details of the individual efforts of the monitoring program are provided in the remainder of this section.

4.1.1 Analysis of Injected CO₂ and Injection Well Testing

4.1.1.1 CO₂ Analysis

Prior to injection, Minnkota Power Cooperative, Inc. (Minnkota) will determine the chemical and physical characteristics of the CO₂ that has been captured for storage using appropriate analytical methods. The anticipated chemical composition is shown in Table 4-3.

Table 4-3. Proposed Composition of the Injection Stream (Minnkota)

Chemical Component	ppmv	mol%
CO ₂	804,195	0.999
H ₂ O	632	7.85E-04
N ₂	163	2.02E-04
O ₂	6	7.45E-06
H ₂	0	0.00E+00
Ar	4	4.97E-06

4.1.1.2 Injection Well Integrity Tests

Until the CO₂ injection well is plugged, Minnkota will monitor its external mechanical integrity with casing integrity tools. These casing integrity tools, either an USIT or electromagnetic (EM) log will be run on the injection well to establish the initial baseline external mechanical integrity. A casing integrity tool will be run annually at a minimum from 7800 ft TD (i.e., inclusive of the Deadwood injection interval) in the McCall-1 to verify the external mechanical integrity of the injection well. Internal mechanical integrity of the injection well will be demonstrated via a tubing-casing annulus pressure test prior to injection at least once every 5 years thereafter. In addition, a pressure fall-off test will be performed in the injection well prior to initiation of CO₂ injection activities, and at least once every 5 years thereafter, to demonstrate storage reservoir injectivity.

4.1.2 Corrosion Monitoring and Prevention Plan

The corrosion management program (CMP) includes identification of active and potential future damage mechanisms and their mitigation, control, and monitoring. The CMP is a major component of the mechanical integrity program and monitoring, reporting, and verification (MRV) plan.

For the purpose of the CMP document, the CCS (carbon capture and storage) hub was divided into the following systems:

- **CO₂ capture facility:** not included in the scope of this permit application.
- **CO₂ transportation flowline:** from the fence line of the CO₂-metering facility to the outlet at the well pad borders.
- **Surface piping, instrumentation, and pressure control equipment at the injection wellsite:** from the outlet of the main CO₂ flowline until the connection with the injection tree/wellhead.
- **Downhole equipment:** from the injection tree/wellhead to the reservoir. There are two categories for downhole equipment based on the service conditions: injector wells and in-zone monitoring wells.

4.1.2.1 *Corrosion Threat Assessment*

The corrosion threat assessment identifies which damage mechanism is currently active and likely to occur in systems or equipment along with the potential consequences of the damage.

4.1.2.2 *Identification of Critical Components and Operating Conditions*

This section identifies the different components included in the corrosion and monitoring plan as well as the fluid compositions, fluid state, operating pressures, temperatures, and flow rates to which the equipment will be exposed:

- For each system, the critical component or equipment is identified in Appendix F.
- A detailed description of the selected material and operating condition is specified by each component or equipment.
- Table 4-4 shows the CO₂ specifications for the Tundra SGS project.

Table 4-4. CO₂ Specifications for Tundra SGS Project

Stream Description	Compressed CO₂ Product to Battery
Stream Number	606
Temperature, °F	120
Pressure, psia	1,688.7
Components	
Component Flows	Limits
H ₂ O	632 ppmv
CO ₂	99.90%
N ₂	163 ppmv
Ar	4 ppmv
O ₂	6 ppmv
H ₂	0%
SO ₂	<1 ppmv
NO ₂	<1 ppmv
NO	30 ppmv

4.1.2.3 *Damage Mechanism*

This section defines the corrosion mechanisms currently active and likely to occur, along with the potential consequences of the damage.

Damage mechanisms are classified in the following four categories:

- **Internal corrosion:** results in loss of wall thickness of the equipment and piping due to the action of the contained fluid on the material of construction. The damage may be general or localized.

- **External corrosion:** results in loss of wall thickness of the equipment and piping due to the action of the environment on the materials of construction. The damage may be general or localized.
- **Environmental-assisted cracking:** caused by a specific combination of the environment, material of construction, and applied or residual stress. Cracking may originate from the inside (process side) or outside (environment side).
- **Mechanical and metallurgic damage:** results from the interaction of the material and process or external environment, such as brittle fracture, creep, erosion, and metal fatigue.

Appendix F summarizes the damage mechanism associated with each component or element during the analysis.

4.1.2.4 Corrosion Control Program (CCP)

For each component identified in the corrosion threat assessment and damage mechanism association, a set of mitigations, corrosion-monitoring techniques, inspections, data gathering, and analysis will be implemented. The CCP includes the following:

- Description of the system and damage mechanism
- Mitigations, if any
- Monitoring description
- Monitoring frequency
- Target limits for monitoring
- Person responsible for the analysis of the monitoring data
- Consequence of operation outside of target limits
- Remedial action outside of target limits
- Required period for remedial action

Appendix F includes the CCP matrix.

4.1.2.5 Annual Review

The operator shall prepare an annual CMP report, confirming the status of the actions and controls described in the CMP, highlighting any findings during inspections, and identifying the failure and root cause analysis. The CMP shall be reviewed more frequently if there are changes in the conditions that could lead to:

- An increase in severity of the active corrosion mechanism.
- A significant likelihood of any inactive corrosion mechanism being activated.

4.1.2.6 Data Management

The results of the corrosion threat assessment and CCP shall be recorded and available for review, according to the operator data management standard and systems.

4.1.3 Surface Leak Detection and Monitoring Plan

Surface components of the injection system, including the CO₂ transport flowline and wellhead, will be monitored using CO₂ leak detection equipment. The flowline from the capture facility to the wellhead will be monitored using a DTS/DAS and DSS fiber optic cable with an interrogator system to provide the ability to detect leaks along the flowline. The CO₂ detectors will be placed at the injection wellhead and key wellsite locations (e.g., flowline riser). Leak detection equipment will be integrated with automated warning systems, which will be inspected and tested on a semiannual basis. Any defective equipment will be repaired or replaced within 10 days and retested, if necessary. A record of each inspection result will be kept by the site operator, maintained for at least 10 years, and available to NDIC upon request. Any detected leaks at the surface facilities shall be promptly reported to NDIC.

4.1.4 Subsurface Leak Detection and Monitoring Plan

The monitoring plan for detecting subsurface leaks comprises the surface-, near-surface-, and deep subsurface-monitoring programs. Surface/near-surface refers to the region from ground surface down to, and including, the deepest USDW as well as surface waters, soil gas (vadose zone), and shallow groundwater (e.g., residential drinking water wells, stock wells, etc.). The deep subsurface zone extends from the base of the deepest USDW to the bottom of the injection zone of the storage reservoir.

Subsurface leak detection will require multiple approaches to ensure confidence that surface (i.e., ambient and workspace atmospheres and surface waters) and near-surface (i.e., vadose zone, groundwater wells, and deepest USDWs) environments are protected and that the CO₂ is safely and permanently stored in the storage reservoir. More specifically, for the Tundra SGS project, near-surface monitoring will include installation of one dedicated Fox Hills Formation monitoring well to detect if the deepest USDW is being impacted by operations as well as two soil gas profile stations, each located at the CO₂ injection (i.e., McCall-1 and NRDT-1) deep monitoring wellsites. In addition, existing groundwater wells within the AOR have been identified, and a set of domestic wells will be periodically sampled as outlined in the monitoring program. These monitoring efforts will provide additional lines of evidence to ensure the surface/near-surface environment is being protected and injected CO₂ is being safely and permanently stored in the storage reservoir.

Operational monitoring at the injection well (McCall-1), including injection rates, pressures, and temperatures, will provide data to inform the monitoring approaches. Internal and external mechanical integrity of the injection well will also be demonstrated to ensure no leakage pathway exists that may allow vertical movement of the CO₂. Additionally, geophysical (seismic) surveys conducted over regular intervals will monitor subsurface CO₂ plume movement.

More details regarding the surface-, near-surface-, and deep subsurface-monitoring efforts are provided in the remainder of this section.

4.1.5 Near-Surface Groundwater and Soil Gas Sampling and Monitoring

Surface and near-surface environments will be monitored within the delineated AOR via groundwater wells (e.g., domestic drinking water wells, stock wells, etc.) and vadose zone soil gas-sampling prior to CO₂ injection (preoperational baseline), during active CO₂ injection (operational), and in the postoperational-monitoring time frame.

Using data from ongoing mine reclamation and power plant monitoring programs, Minnkota has achieved near-surface baseline sampling of the Tongue River aquifer near the injection site. The North Dakota State Water Commission (NDSWC) database was used to identify candidate wells within the AOR to complete an initial near-surface baseline sampling program, including seasonal sampling of existing groundwater wells (Figure 4-1). This baseline sampling program and results to date are described in detail in Section 4.1.6.

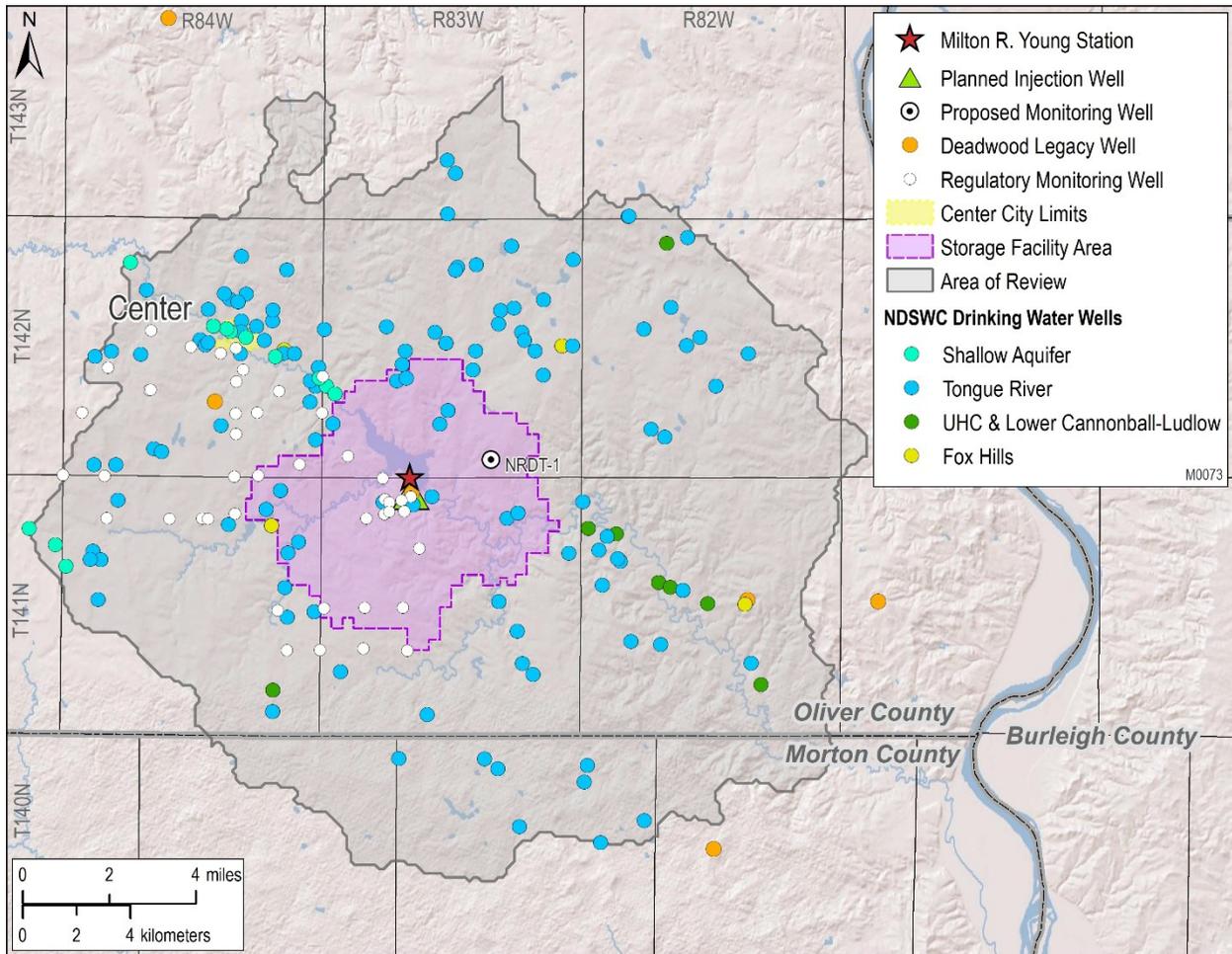


Figure 4-1. Minnkota will carry out initial sampling program for near-surface groundwater wells. Shown are existing regulatory monitoring wells to be used for baseline; all wells listed for drinking water in the NDSWC database by aquifer; the location of all plugged and abandoned (P&A) legacy oil and gas exploratory wells; city of Center, North Dakota; Milton R. Young Station (MRYS); and McCall-1 (proposed injector) and NRDT-1 (proposed monitoring well) in relation to the storage facility area and the AOR. The well drilled for baseline characterization and monitoring of the Fox Hills Formation will be located at the injection wellsite.

Prior to injection operations, one dedicated Fox Hills Formation monitoring well will be installed at the McCall-1 CO₂ injection wellsite. The Fox Hills Formation will be sampled seasonally, and baseline state-certified laboratory analyses will be provided to NDIC prior to injection. In addition, two soil gas profile stations will be installed: one near the McCall-1 injection wellsite and another near the deep monitoring wellsite (NRDT-1). Baseline soil gas analyses will be provided to NDIC prior to CO₂ injection operations.

The near-surface monitoring plan will focus on the dedicated Fox Hills Formation well, a subset of the existing groundwater wells characterized to establish baseline, and soil gas profile stations. The plan is described in Section 4.1.7.

4.1.6 Baseline Sampling Program

4.1.6.1 Groundwater Baseline Sampling

An initial baseline characterization of the shallow groundwater near the McCall-1 injection site has been completed by acquiring data from long-term regulatory monitoring in the Tongue River aquifer by Minnkota's MRYS and BNI Coal. Additional baseline characterization of existing groundwater wells within the AOR will be completed prior to CO₂ injection by collecting and characterizing seasonal samples of up to 16 groundwater wells taken from the five aquifer systems (i.e., Square Butte Creek, Otter Creek, Tongue River, Upper Hell Creek–Lower Cannonball and Ludlow, and Upper Fox Hills–Lower Hell Creek aquifers) underlying the AOR. The locations of these candidate wells are shown in Figure 4-2. The results of the existing regulatory program to be used for baseline measurements for TDS (total dissolved solids), pH, specific conductivity, and alkalinity are provided in Table 4-5, with comprehensive laboratory analyses for each well attached in Appendix C.

Future baseline sampling will include selected domestic wells in the Square Butte Creek, Tongue River, Upper Hell Creek–Lower Cannonball and Ludlow, and Upper Fox Hills–Lower Hell Creek aquifers and one U.S. Geological Survey (USGS) Fox Hills observation well. Verification of the domestic well status is under way, and final selection of domestic wells will be based on viability of the well (existence, depth, access, etc.) and landowner cooperation. The locations of these candidate wells are shown in Figure 4-2. Appendix C describes the selection method and well verification results for all well permits in the NDSWC database labeled domestic, domestic/stock, and municipal. Characterization of selected domestic wells and one USGS Fox Hills observation well will include the water quality parameters; anions; dissolved and total carbon, major cations, and trace metals; and isotope analysis to establish the natural partitioning of the groundwater constituents listed in Appendix C.

The results from these sampling efforts will provide a preoperational baseline of the groundwater quality in the four USDWs within the AOR of the CO₂ geologic storage project. The results will be submitted to NDIC before CO₂ injection occurs.

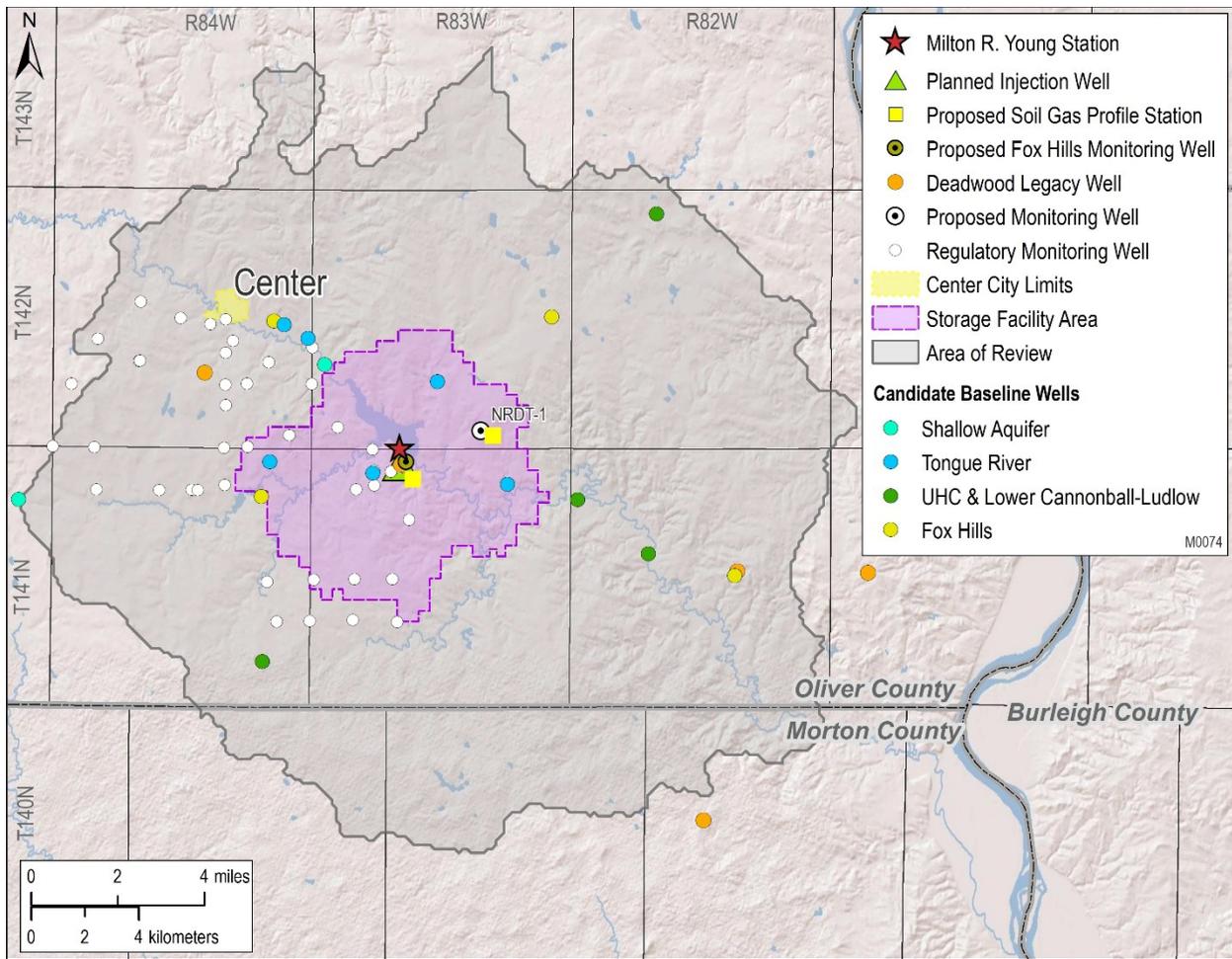


Figure 4-2. Tundra SGS project groundwater well sampling program to establish a groundwater baseline, including seasonal fluctuation, within the AOR. Shown are locations for existing regulatory monitoring well data and candidate options for additional baseline sampling by aquifer.

Table 4-5. Baseline Groundwater-Data

Parameter		TDS, mg/L*			pH			Specific Conductance, mS/cm			Alkalinity as CaCO ₃ , mg/L		
BNI Well No.	Depth, ft	July 2018	July 2019	July 2020	July 2018	July 2019	July 2020	July 2018	July 2019	July 2020	July 2018	July 2019	July 2020
322A	21	525	726	532	6.19	6.6	6.6	801	980	832	118	124	165
324	88	360	817	745	7.8	7.8	7.8	649	1193	1182	188	345	369
363	82	1440	1500	1550	8.3	8.3	8.2	2446	2460	2454	1090	1110	1200
C1-1	129	706	699	698	8.4	8.4	8.4	1151	1123	1168	454	480	526
C7-1	184	1410	1480	1490	8.5	8.4	8.2	2105	2098	2096	985	1050	1120
C9-1	163	1520	1610	1430	8.2	8.3	8.3	2029	2032	2012	968	1030	1080
MRYS Well No.	Depth, ft	May 2019	Sept. 2019	April 2020	May 2019	Sept. 2019	April 2020	May 2019	Sept. 2019	April 2020	May 2019	Sept. 2019	April 2020
92-5A	185	800	790	780	8.75	8.9	8.94	1,131	1,184	1,129	488	520	499
92-6A	150	1,180	1,180	1,150	8.43	8.87	8.67	1,697	1,744	1,642	641	690	632
92-3	155	1,270	1,280	1,280	8.32	8.65	8.66	1,812	1,887	1,841	823	910	837
95-4	145	1,260	1,260	1,260	8.31	8.55	8.53	1,797	1,862	1,815	829	880	836
97-1	67	2,740	2,900	2,410	6.3	6.26	6.33	3,736	3,485	3,597	284	310	327
USGS Well No.	Depth, ft	January 2021			January 2021			January 2021			January 2021		
10	1,290	1,520			8.42			2,641			938		

* Calculation. For MRYS wells, calculated on reported field electrical conductivity.

4.1.6.2 Soil Gas Baseline Sampling

Soil gas sampling and analyses will be performed in order to establish baseline soil gas concentrations near the injection and deep monitoring wellsites in the AOR. Effective soil gas monitoring in reclaimed mine lands requires installation of soil gas profile stations, which will be located off of the well pads near the McCall-1 CO₂ injection and deep monitoring (NRDT-1) wellsites, as shown in Figure 4-3. The analyses, which determine the concentration of CO₂, O₂, and N₂, will be performed in accordance with ASTM International (ASTM) standard procedures (D5314) for soil gas sampling and analysis (ASTM International, 2006). In addition, isotopic analysis of the baseline soil gas samples will establish the natural source partitioning of the gases.

The sampling results from these efforts will provide a preoperational baseline of the soil gas chemistry of the vadose zone in the AOR of the CO₂ geologic storage project. Results will be submitted to NDIC.

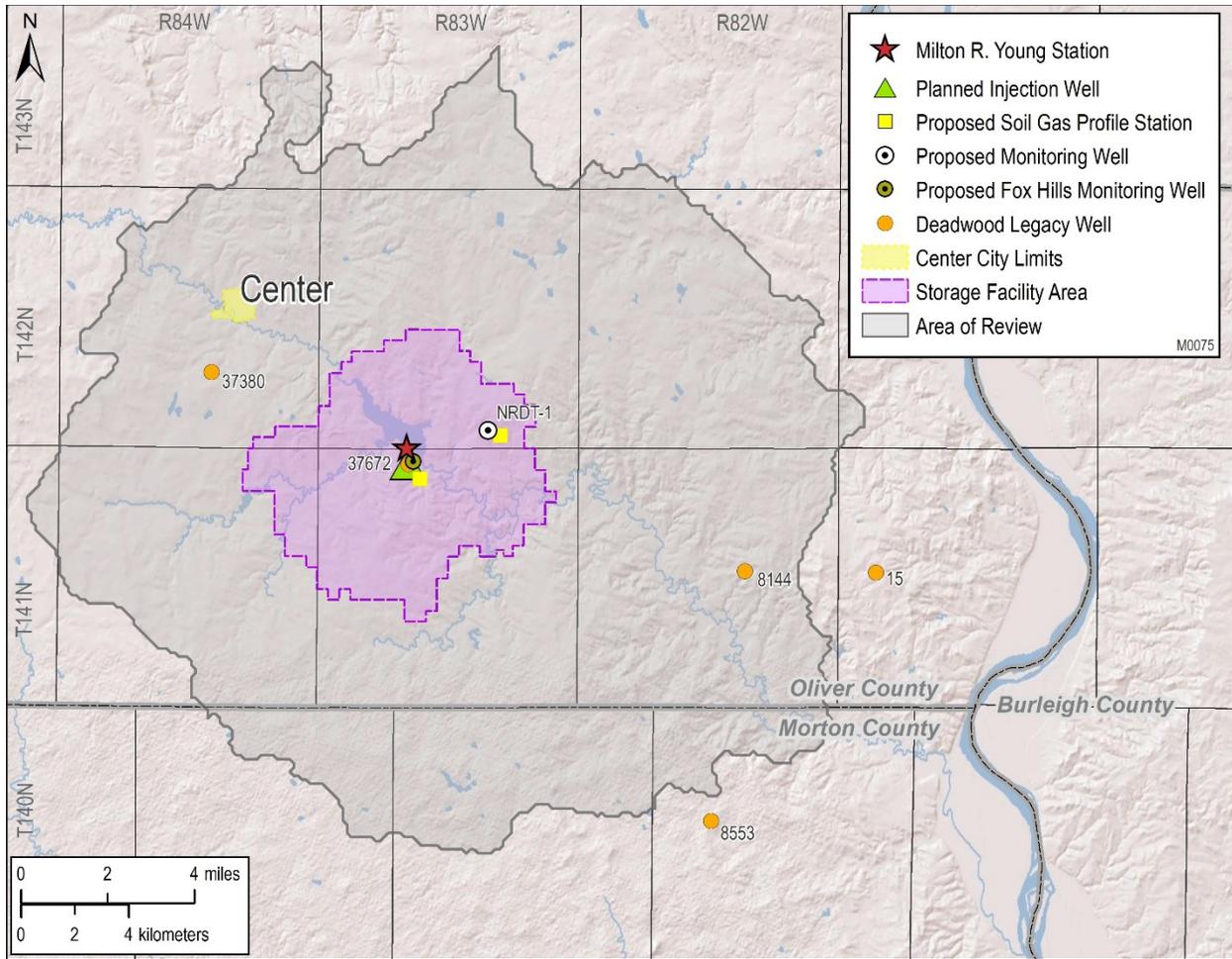


Figure 4-3. Minnkota will install soil gas profile stations and complete an initial soil gas-sampling program to establish baseline soil gas concentrations, including seasonal fluctuation. The sample locations are near the CO₂ injection McCall-1 and deep monitoring NRDT-1 wellsites of the Tundra SGS project site.

4.1.7 Near-Surface (Groundwater and Soil Gas) Monitoring Plan

Prior to injection operations, Minnkota will drill and construct a dedicated groundwater-monitoring well in the Fox Hills Formation (i.e., deepest USDW) at the McCall-1 (proposed) CO₂ injection wellsite (Figure 4-4). Baseline Fox Hills Formation water samples will be collected from this monitoring well over a 1-year period prior to CO₂ injection, with the goal of securing these samples during each of the four seasons (spring, summer, fall, and winter). Minnkota plans to monitor the vadose zone by installing two soil gas profile stations, each one near the well sites of the McCall-1 (proposed) CO₂ injection and NRDT-1 deep monitoring well pads (Figure 4-4). Minnkota will select a subset of existing groundwater wells, as outlined above, within the AOR boundary for periodic monitoring during CO₂ injection operations and postinjection monitoring (see Figure 4-4).

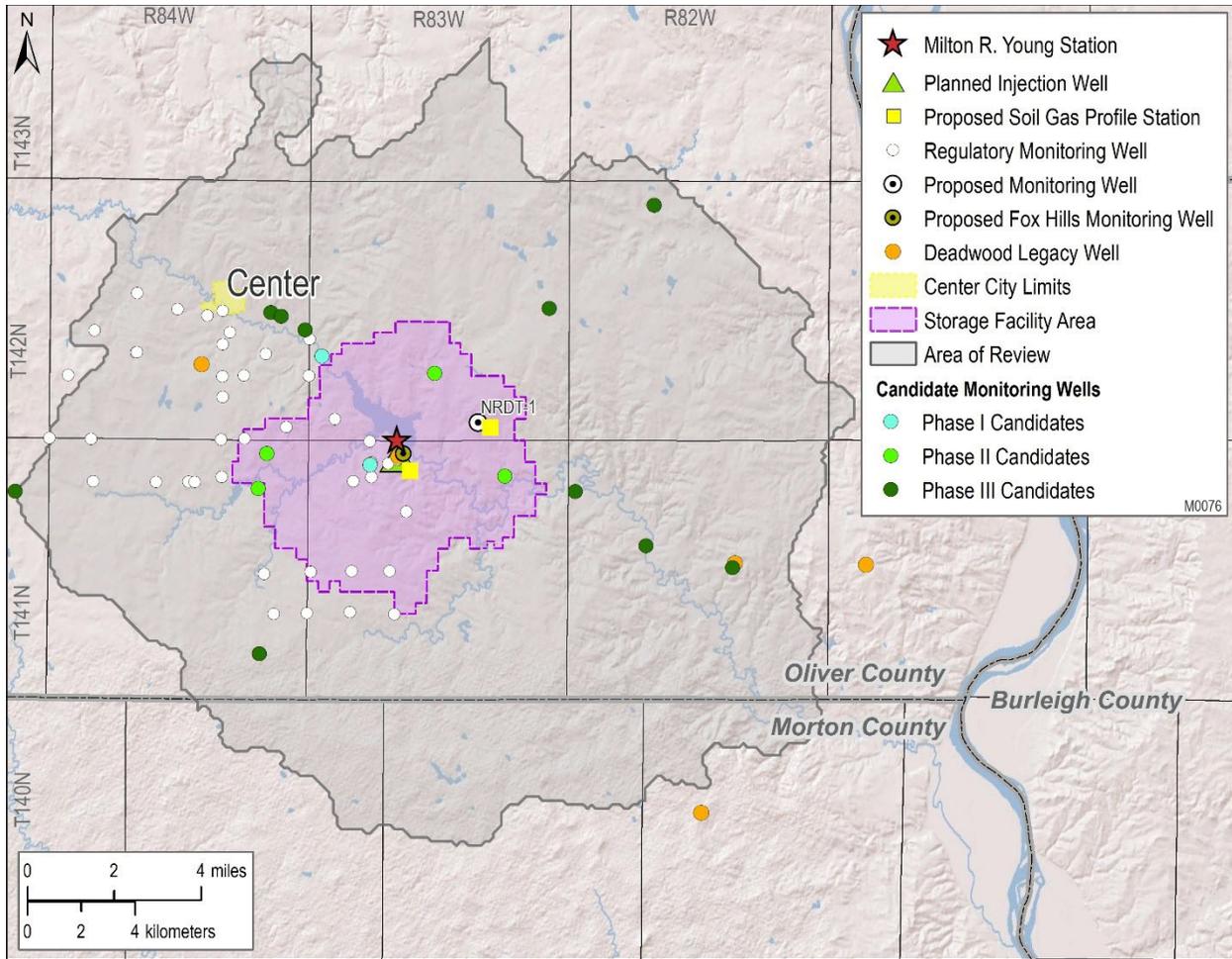


Figure 4-4. Tundra SGS project near-surface monitoring plan sample locations showing the Fox Hills Formation (deepest USDW) monitoring well, candidate groundwater wells to be sampled, and the two soil gas profile stations in and around the Tundra SGS project site.

During the first 3 years of CO₂ injection activities, the Fox Hills Formation monitoring well, soil gas profile stations (near the McCall-1 CO₂ injection and NRDT-1 deep monitoring wellsites), and select groundwater wells within the AOR will be sampled on an annual basis. All laboratory results will be filed with NDIC. If the results show no significant changes to water chemistry, the well-sampling frequency will be reduced to one sample every 5 years starting at Year 5 of the injection operations for all previously monitored wells.

As the areal extent of the CO₂ plume increases, monitoring of additional groundwater wells within the AOR will be phased in over time based on monitoring of the CO₂ plume in the injection zone. Each additional well will be sampled annually for 3 years. If the results show no significant changes to the water chemistry, the sampling frequency will be reduced to one sample at a 2-year interval and then at 5-year intervals thereafter. A detailed near-surface monitoring plan is presented in Table 4-6, including the frequency and duration of the sampling during each phase (i.e., preinjection, operational, and postoperational) of the geologic CO₂ storage project.

Table 4-6. Baseline (preinjection), Operational, and Postoperational Monitoring Frequency and Duration for Soil Gas, Groundwater, and Surface Air

Monitoring Type	Baseline (preinjection)*	Operational	Postoperational
Soil Monitoring			
Soil Gas Profile Stations	Duration: minimum 1 year	Duration: 20 years	Duration: minimum 10 years
Soil Gas Probes	Frequency: Sample 3–4 events per well to establish natural seasonal baseline. Soil gas profile stations at each location (near the McCall-1 CO ₂ injection and NRDT-1 deep monitoring wellsites) will be sampled prior to initiation of CO ₂ injection operations.	Frequency: 3–4 sample events per year at soil gas profile station locations (near the McCall-1 CO ₂ injection and NRDT-1 deep monitoring wellsites) to account for natural seasonal fluctuation. Additional soil gas probe sampling may be conducted every 5 years based on monitoring and the expansion of the subsurface CO ₂ plume in the injection zone.	Frequency: 3–4 seasonal sample events at soil gas profile station locations (near the McCall-1 CO ₂ injection and NRDT-1 deep monitoring wellsites) performed every 3 years following cessation of CO ₂ injection.
Water Monitoring			
Groundwater (existing freshwater wells, e.g., domestic water wells, municipal wells, etc.)	Duration: minimum 1 year Frequency: minimum of one sample per year of select groundwater wells within the AOR. Groundwater wells are selected based on location, type, depth, aquifer, etc., to ensure a baseline of each groundwater horizon has been established prior to CO ₂ injection.	Duration: 20 years Frequency: Sampling of select groundwater wells within the AOR will occur at a minimum of once per year during Years 1–3. Assuming the data are consistent during the first 3 years, monitoring frequency will decrease to one at a 2-year interval and then repeated at 5-year intervals thereafter. Additional monitoring wells will be phased in over time based on expansion of the subsurface CO ₂ plume in the injection zone. Sampling frequency for added wells will follow the same structure as the original wells.	Duration: minimum 10 years Frequency: 3–4 sample events at cessation of injection and 3–4 sample events as part of the final site closure assessment.

Continued . . .

Table 4-6. Baseline (preinjection), Operational, and Postoperational Monitoring Frequency and Duration for Soil Gas, Groundwater, and Surface Air (continued)

Monitoring Type	Baseline (preinjection)*	Operational	Postoperational
Fox Hills Formation (deepest USDW)	Duration: minimum of 1 year Frequency: 3–4 sample events per well (establish seasonal fluctuation baseline). One Fox Hills Formation monitoring well (to be installed) located at the CO ₂ injection wellsite (McCall-1).	Duration: 20 years Frequency: Sampling of Fox Hills monitoring well will occur at a minimum of once per year during Years 1–3. Assuming the data are consistent during the first 3 years, monitoring frequency will decrease to one at a 2-year interval and then repeated at 5-year intervals thereafter.	Duration: minimum 10 years Frequency: 3–4 sample events at cessation of injection and 3–4 sample events as part of the final site closure assessment.

* The preinjection baseline monitoring effort is under way as of the writing of this permit application. As noted in the text, selected additional samples will be collected between the submission date of this permit application and the start of CO₂ injection.

4.1.8 Deep Subsurface Monitoring of Free-Phase CO₂ Plume and Pressure Front

Minnkota will implement direct and indirect methods to monitor the location, thickness, and distribution of the free-phase CO₂ plume (plume) and associated pressure front (pressure) relative to the permitted storage reservoir. The time frame of these monitoring efforts will encompass the entire life cycle of the injection site, which includes the preoperational (baseline), operational, and postoperational periods. The methods described in Tables 4-7 and 4-8 will be used to characterize the plume and pressure within the AOR. Minnkota’s testing and monitoring plan will include periodic reviews in which the monitoring data and operational data will be analyzed, AOR will be reevaluated and, if warranted, the testing and monitoring plan will be adapted to meet NDIC monitoring requirements.

The testing and monitoring plan will be reviewed in this manner at least once every 5 years. Based on this review, it will either be demonstrated that no amendment to the testing and monitoring plan is needed or modifications to the program are necessary to ensure proper monitoring of the storage performance is achieved and risk profile of the storage operations is addressed moving forward. This determination will be submitted to NDIC for approval. Should amendments to the testing and monitoring plan be necessary, these revisions will be incorporated into the permit following approval by NDIC. During the operational period, monitoring methods and data collection may be supplemented or replaced as advanced techniques are developed.

Early monitoring and operational data will be used to evaluate conformance between observations and history-matched simulation of the CO₂ and pressure distribution relative to the permitted geologic storage facility. The early monitoring and operational data will be used for additional calibration of the geologic model and associated simulations. These calibrated simulations and model interpretations will be used to demonstrate lateral and vertical containment of the injected CO₂ within the permitted geologic storage facility.

Table 4-7. Description of Tundra SGS Monitoring Program

Monitoring Type	Preoperational (baseline)	Operational	Postoperational
Storage Reservoir Monitoring			
Injection Well Monitoring (McCall-1) During Operations: <ul style="list-style-type: none"> • Flow Rates • Volumes • Surface Injection Pressure • Surface Injectate Temperature • Annulus Pressure Between Tubing and Long-String 	Frequency: initial setup The maximum allowable injection pressure and annulus pressure will be derived from preoperational injection tests.	Duration: 20 years Frequency: continuous monitoring	Plug and Abandon (P&A) injection well at cessation of injection operations Continue to monitor annulus pressure in NRDT-1 well
• Packer Fluid (corrosion inhibitor) Volume	Initial volume of packer fluid to fill casing.	Record if additional volume to fill annulus. Test corrosion inhibitors effectiveness (as needed during well workovers).	P&A injection well at cessation of injection operations. Monitor fluid levels until well is plugged.
Downhole Pressure and Temperature Monitoring			
Tubing-Conveyed Pressure and Temperature Gauges in McCall-1 and NRDT-1	Gauges provide baseline temperature and pressure of the injection zone (Deadwood).	Gauges provide continuous temperature and pressure monitoring of the injection zone (Deadwood).	Gauges provide continuous temperature and pressure monitoring of the injection zone (Deadwood) until plume stabilization. Monitoring will continue in the NRDT-1 well as part of postinjection site care and facility closure plan.
Wireline Logging and Retrievable Monitoring			
Pulsed-Neutron Log (PNL) (McCall-1 and NRDT-1)	Baseline PNL logging	PNL logging to ensure fluids are contained within storage interval and ground-truth 3D seismic monitors once every 5 years (in conjunction with timing of seismic monitor).	Log McCall-1 at cessation and before P&A and NRDT-1 well at cessation of injection and once every 5 years thereafter until plume stabilization (in conjunction with timing of seismic monitor).
External Mechanical Integrity: Casing Integrity Tools (i.e., USIT or EM Casing Inspection Tool (McCall-1 and NRDT-1)	Baseline casing inspection logging prior to injection.	Duration: 20 years Frequency: McCall-1 annual logging (minimum 7800 ft TD) across Deadwood injection interval. NRDT-1 5-year logging interval (during well workovers, if possible).	Duration: minimum 10 years postinjection Frequency: Perform during well workovers but not more frequently than once every 5 years in NRDT-1 well and N/A P&A McCall-1.

Continued . . .

Table 4-7. Description of Tundra SGS Monitoring Program (continued)

Monitoring Type	Baseline (preoperational)	Operational	Postoperational
Internal Mechanical Integrity: <ul style="list-style-type: none"> Tubing-Casing Annulus Pressure Test 	Mechanical integrity test – internal pressure testing. McCall-1 (proposed) and NRDT-1 (proposed)	Perform during well workovers but not more frequently than once every 5 years in McCall-1 (proposed) and NRDT-1 (proposed)	Duration: minimum 10 years postinjection Frequency: perform during well workovers but not more frequently than once every 5 years in NRDT-1 (proposed) well
External Mechanical Integrity: <ul style="list-style-type: none"> Downhole Temperature 	DTS AND Baseline temperature logging through the storage interval to surface McCall-1 (proposed) and NRDT-1 (proposed)	Continuous DTS OR, if fiber fails, annual temperature logging through the storage interval to surface NRDT-1 (proposed). Continuous DTS (surface – 7800 ft) OR, if fiber fails, annual temperature logging through the storage interval (7800 ft TD) McCall-1 (proposed).	Annual temperature logging in NRDT-1 (if fiber fails) until plume stabilization.
Pressure Fall-Off Test (injection zone)	Prior to injection at McCall-1 (proposed)	Every 5 years at McCall-1 (proposed)	Prior to P&A
Corrosion Monitoring	Baseline material specifications	Quarterly sampling for loss of mass, thickness, cracking, pitting, and other signs of corrosion. Corrosion coupons placed in contact with the CO ₂ stream.	N/A
Geophysical Monitoring			
Time-Lapse Seismic	Existing baseline 2D and 3D seismic and integrated in reservoir model for site characterization. Existing 2D and 3D seismic covers the predicted extent of the CO ₂ plume in the early monitoring of the site.	2D and/or 3D seismic monitor will be collected within first 5 years of injection sufficient to determine distribution of injected free-phase CO ₂ plume relative to permitted area and every 5 years thereafter. If plumes exceed baseline data extents, additional baseline data will be acquired or 2D or 3D AVO (amplitude variation with offset) data can be used to monitor plume extents.	2D and/or 3D time-lapse seismic and/or AVO method will continue every 5 years as part of minimum 10-year post-CO ₂ injection operations monitoring plan and until stability of plume is demonstrated.

Continued . . .

Table 4-7. Description of Tundra SGS Monitoring Program (continued)

Monitoring Type	Baseline (preoperational)	Operational	Postoperational
InSAR	Feasibility of surface deformation monitoring with InSAR – baseline data	To be determined. Continuous monitoring of ground elevation based on relative surface deformation with InSAR	To be determined. Continuous monitoring of ground elevation based on relative surface deformation with InSAR until storage facility achieves stabilization.
Passive Seismicity	Project will plan additional seismometer stations sufficient to confidently measure baseline seismicity 5 km from injection area.	The data collected in the surface seismometers will be continuously recorded and analyzed for potential seismicity magnitudes and hypocenter locations.	N/A

Table 4-8a. Logging Program for Deadwood Injector Well (McCall-1 [proposed])

Log	Justification	NDAC Section
Cased Hole Logs: ultrasonic CBL (cement bond log), VDL (variable-density log), GR (gamma ray), Temperature Log	Identify cement bond quality radially. Detect cement channels. Evaluate the cement top and zonal isolation.	43-05-01-11.2(1c[2])
Triple Combo (resistivity, density,* neutron,* GR, caliper) and SP (spontaneous potential) *No density or neutron in surface section.	Quantify variability in reservoir properties such as resistivity and lithology. Identify the wellbore volume to calculate the required cement volume. Provide input for enhanced geomodeling and predictive simulation of CO ₂ injection into the interest zones to improve test design and interpretations.	43-05-01-11.2(1c[1])
Temperature Log	Monitor wellbore temperature in the openhole. A temperature log will also be run in cased hole for temperature to DTS calibration.	43-05-01-11.2(1c[2])
Spectral GR	Identify clays and lithology that could affect injectivity.	43-05-01-11.2(2)
Dipole Sonic and 4-Arm Caliper	Identify mechanical properties including stress anisotropy. Provide compression and shear waves for seismic tie-in and quantitative analysis of the seismic data.	43-05-01-11.2(1c[1])
Fracture Finder Log	Quantify fractures in the Broom Creek and Black Island/Deadwood Formations and confining layers to ensure safe, long-term storage of CO ₂ .	43-05-01-11.2(1c[1])
MDT (modular dynamics testing) Fluid Sampling	Collect fluid samples from the Broom Creek and Deadwood Formations for geochemical testing and TDS quantification.	43-05-01-11.2(2)
MDT Formation Pressure Testing	Collect reservoir pressure tests to establish a pressure profile and mobility.	43-05-01-11.2(2)
MDT Stress Testing	Collect breakdown pressure, fracture propagation pressure, fracture closure pressure (minimum in situ stress) to establish injection pressure limits.	43-05-01-11.2(1c[1])
Sidewall Cores	Sidewall cores will be collected from the injection zones and associated confining zones.	43-05-01-11.2(2)

Table 4-8b. Logging Program for Deadwood Monitor Well (NRDT-1 proposed monitoring well)

Log	Justification	NDAC Section
Cased Hole Logs: Ultrasonic CBL, VDL, GR, Temperature Log	Identify cement bond quality radially. Detect cement channels. Evaluate the cement top and zonal isolation.	43-05-01-11.2(1c[2])
Triple Combo and SP	Quantify variability in reservoir properties such as resistivity and lithology. Identify the wellbore volume to calculate the required cement volume. Provide input for enhanced geomodeling and predictive simulation of CO ₂ injection into the interest zones to improve test design and interpretations.	43-05-01-11.2(1c[1])
Temperature Log	Monitor wellbore temperature in the openhole. A temperature log will also be run in cased hole for temperature to DTS calibration.	43-05-01-11.2(1c[2])
Dipole Sonic and 4-Arm Caliper	Identify mechanical properties including stress anisotropy. Provide compression and shear waves for seismic tie-in and quantitative analysis of the seismic data.	43-05-01-11.2(1c[1])

Tables 4-8a and 4-8b describe the logging programs for the Deadwood injector (McCall-1) and the monitoring (NRDT-1) wells (Figure 4-5). Included in the table is a description of logs collected. These wellbore data have been integrated with preoperational (baseline) 3D seismic and 2D seismic lines to provide a detailed reservoir and structural description for the geologic model and inform the reservoir simulations that are used to characterize the initial state of the reservoir before injection operations. The simulated CO₂ plumes that are based on the current geologic model and simulations are shown in Figures 4-6 and 4-7. These simulated CO₂ plume extents inform the timing and frequency of the application of the direct and indirect monitoring methods of the testing and monitoring plan.

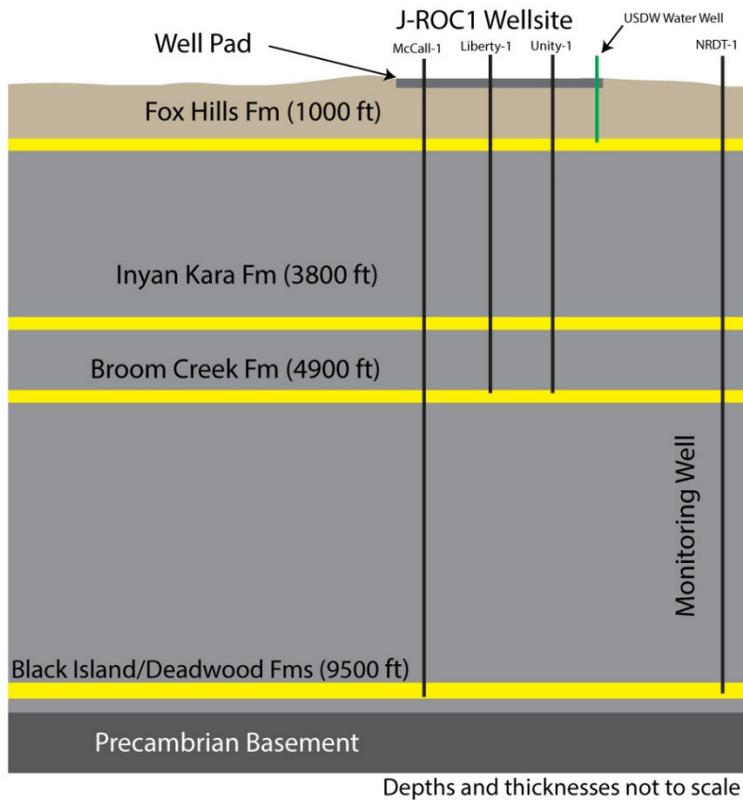


Figure 4-5. Monitoring schematic (not to scale) includes the location of the two Broom Creek injectors (Liberty-1 and Unity-1 [proposed]), the Deadwood injector (McCall-1 [proposed]), and monitoring well NRDT-1 (proposed).

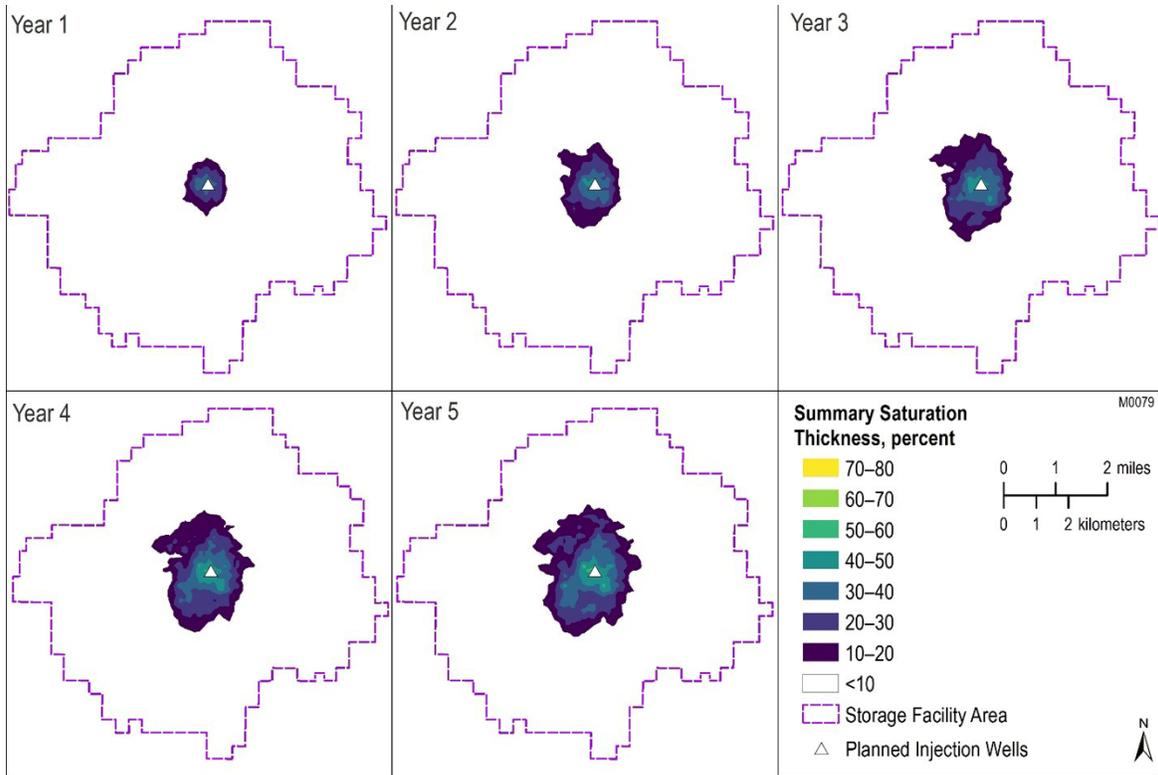


Figure 4-6. Simulated CO₂ plume saturation at the end of Years 1 through 5 after initial CO₂ injection.

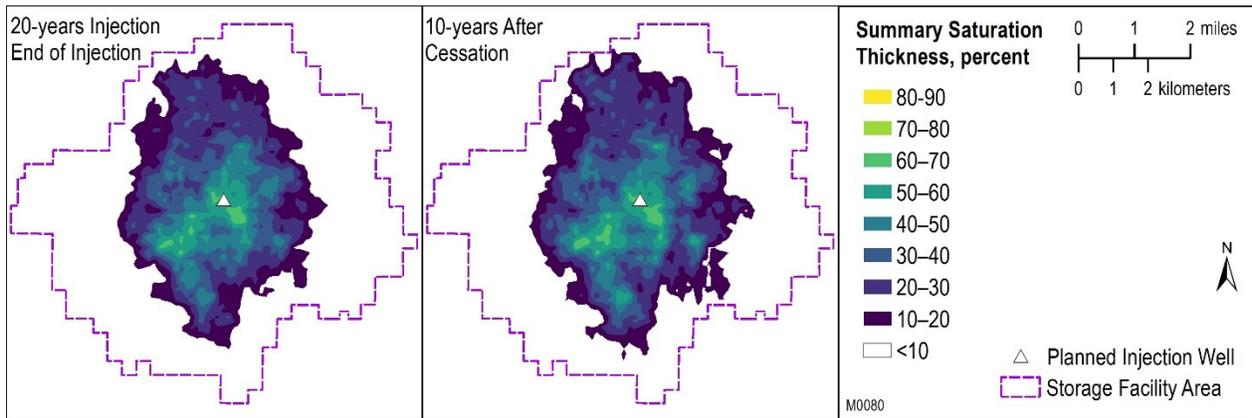


Figure 4-7. Simulated extent of the CO₂ plume at the cessation of injection and the postinjection stabilized plume.

4.1.8.1 Direct Monitoring Methods

To directly monitor and track the extent of the CO₂ plume within the storage reservoir, the injection (McCall-1) and monitoring (NRDT-1) wells will be equipped with tubing conveyed temperature (borehole temperature) and pressure (borehole pressure) gauges as well as casing deployed distributed fiber optics sensing systems (see Figures 4-8 and 4-9). Continuous reservoir temperature and pressure will be monitored in the Deadwood Formation and temperature in the overlying confining zone. Monitoring of the overlying interval can provide an early warning of out-of-zone migration of fluids, which provides sufficient time for the development and implementation of mitigation strategies to ensure these migrating fluids do not impact a USDW or reach the surface.

The fiber optic sensing system installed within the McCall-1 (proposed) and NRDT-1 proposed monitoring wells will be used to acquire continuous high-resolution temperature data. PNLs of the injection and monitoring wells will also be performed on a 5-year schedule basis to demonstrate that fluids are not moving beyond the sealing formations. Preoperational baseline PNL data will be collected in the injection and monitoring wells. These time-lapse saturation data will be used to monitor for CO₂ in the formation directly above the storage reservoir, otherwise known as the above-zone monitoring interval, or AZMI, as an assurance-monitoring technique.



McCall-1 (Deadwood Injector)

KB: 2022 ft / GL:1997 ft
Latitude / Longitude : 47.0627201 N ; 101.2131405 W

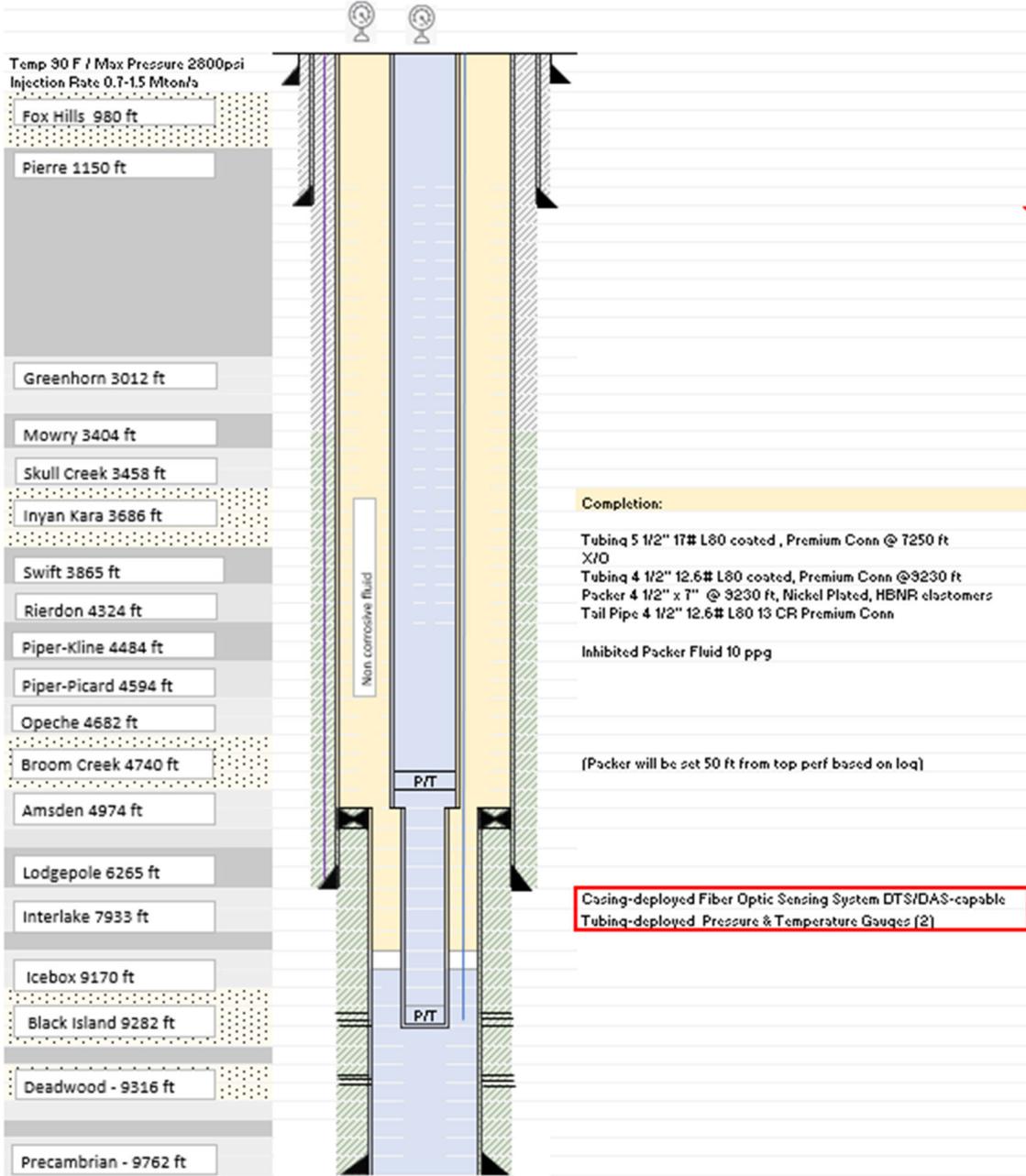


Figure 4-8. McCall-1 Deadwood injection wellbore schematic showing placement of tubing-deployed pressure and temperature-monitoring gauges and casing-deployed fiber optic sensing system (DTS/DAS-capable).



NRDT-1
Monitor Well
Broom Creek / Deadwood

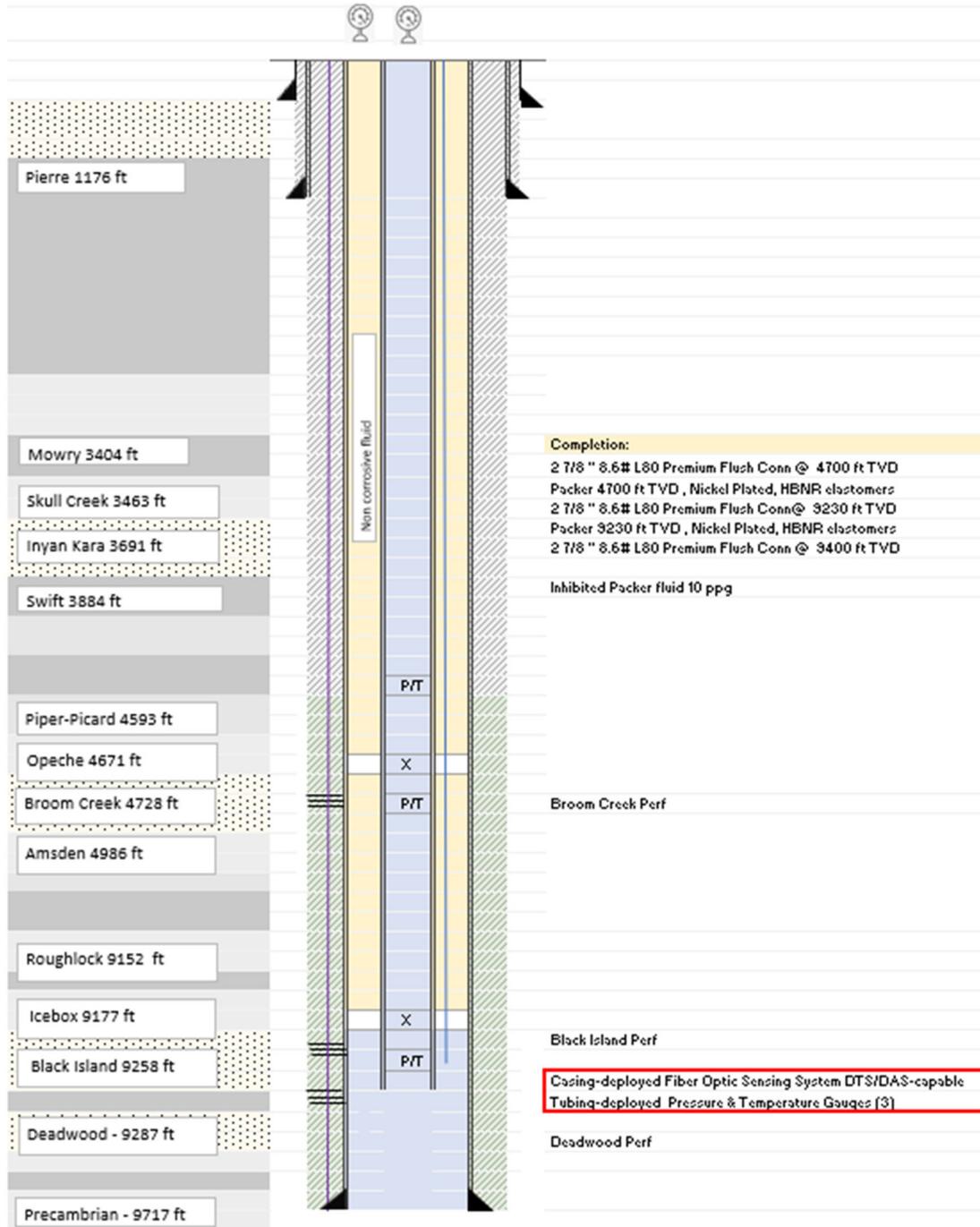


Figure 4-9. Broom Creek and Deadwood monitoring wellbore schematic showing placement of tubing-deployed pressure and temperature-monitoring gauges and casing-deployed fiber optic sensing system (DTS/DAS-capable).

4.1.8.2 Indirect Monitoring Methods

Indirect monitoring methods will also track the extent of the CO₂ plume within the storage reservoir and can be accomplished by performing time-lapse geophysical surveys of the AOR. A 3D seismic survey was conducted to establish baseline conditions in the storage reservoir. Figure 4-10 shows the extent of the injected free-phase CO₂ plume at the end of 20 years of injection relative to the baseline 3D seismic and storage facility area. To demonstrate conformance between the reservoir model simulation and site performance, repeat 2D and/or 3D seismic surveys (4D seismic) will be collected to monitor the extent of the CO₂ plume within the first 5 years of CO₂ injection.

The seismic surveys will also be interpreted for an AVO response for detecting seismic response related to the CO₂ plume. In later years of the operational period (e.g., 10–20 years) if the free-phase CO₂ plume falls outside of the baseline 3D outline, AVO methods, with 2D and 3D

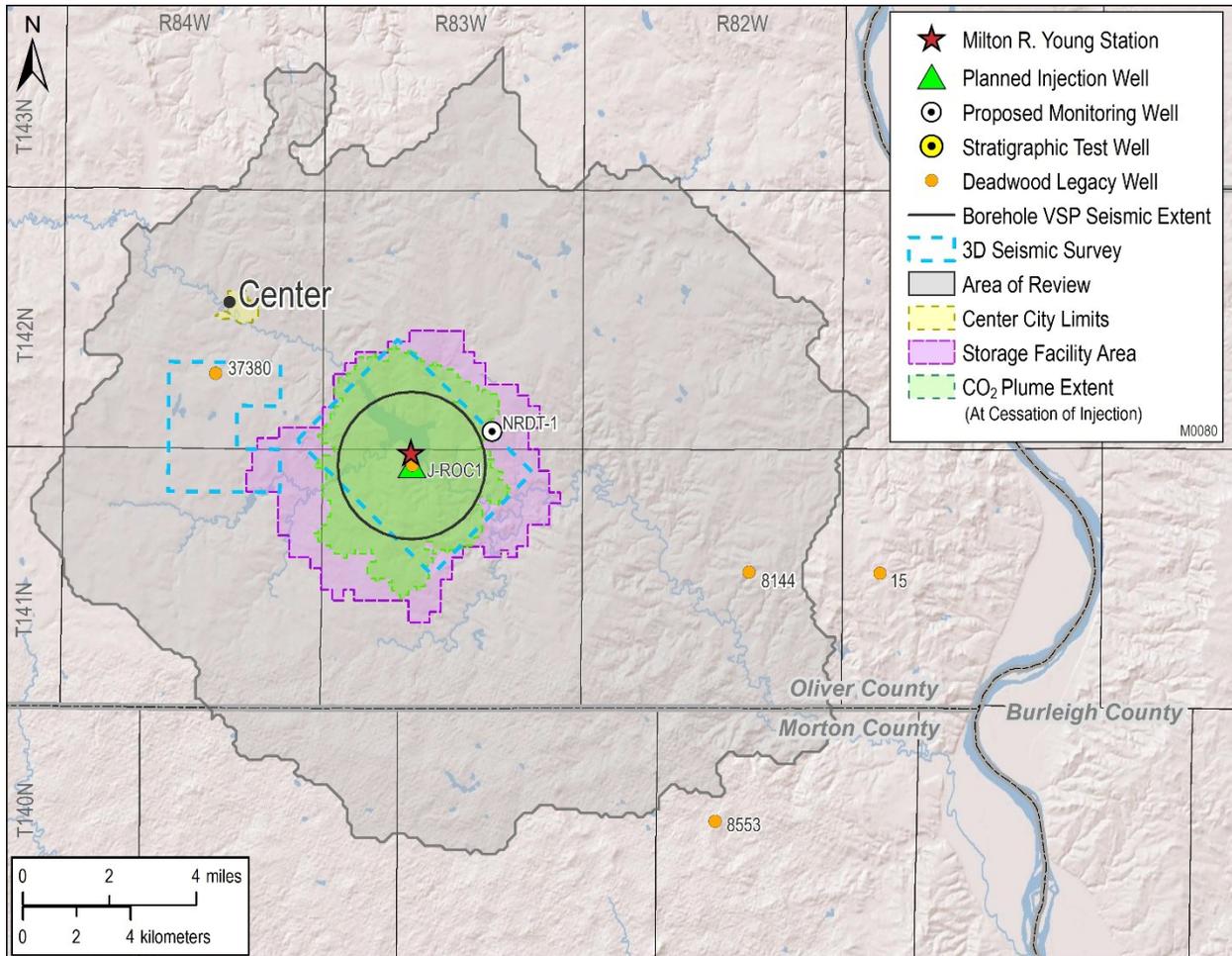


Figure 4-10. Simulated extent of the CO₂ plume at the end of injection operations in green. Surface seismic and borehole VSP seismic data outlines shown on the map will provide coverage for indirectly monitoring the predicted extents of the CO₂ plume over time.

prestack seismic, can be implemented as a standalone method for monitoring CO₂ migration. If it is found that the AVO method is not effective, the baseline 2D and/or 3D will need to be extended for sufficient time-lapse coverage. This seismic monitoring data will provide confirmation of the simulation predictions and confirm the extent of the CO₂ plume within the AOR. Through the operational phase of the project, the 4D seismic monitoring plan will be adapted based on updated simulations of the predicted extents of the CO₂ plume. At the end of the operational phase, 4D seismic and/or AVO methods will be utilized during the postinjection period to confirm stabilization of the plume, as defined in Appendix A. The monitoring plan will be reevaluated at least every 5 years to determine if the testing and monitoring plan is sufficiently characterizing of the migrating CO₂ plume.

The time-lapse seismic response (4D seismic) and AVO method provide measurements of the change in fluid compressibility. Since CO₂ is a highly compressible fluid, it can be tracked with conventional seismic methods. Borehole seismic (3D vertical seismic profile [VSP]) methods are effective for monitoring the distribution of the CO₂ plume. During CO₂ injection operations, the DAS fiber optic system provides a cost-effective and higher-resolution opportunity for monitoring the extents of the CO₂ injection with a 3D VSP. The extent of 3D VSP coverage for the Deadwood Formation will be limited relative to the predicted plume extents. The 3D VSP method should be implemented early in the operational period (i.e., within the first 10 years) when the simulated plume extent is predicted to be well within the possible 3D VSP coverage. The maximum radius of the 3D VSP image area, as a rule of thumb, can be estimated to be approximately the equivalent of the depth of the formation being imaged. Once the radius of the injected plume exceeds the depth to the Deadwood Formation (~9,000 ft), the 3D VSP recorded in the injection well will not adequately monitor the plume. At this point, surface seismic (i.e., 4D seismic and/or AVO) is an appropriate method for monitoring the advancing plume.

Throughout the operational phase of injection operations, continuous monitoring of seismicity will be performed. Existing seismometer stations and additional stations will be installed (“array” of surface seismometers) sufficient to confidently measure baseline seismicity 5 km from injection. The data collected in the surface seismometers will be continuously recorded and analyzed for potential seismicity magnitudes and hypocenter locations. These seismometer stations with broadband sensors are capable of continuously measuring a wide range of seismicity (micro/macro events). Baseline passive seismic data will be collected both prior to injection as well as throughout the operational phase of the project.

InSAR (Vasco and others, 2020), which can detect small-scale surface ground deformation, has been shown to be one such technique for approximately mapping pressure distribution associated with subsurface fluid injection (Reed, 2021). Geodetic methods, like InSAR, are widely available and allow for multiple nonunique interpretations requiring integration with other monitoring methods (e.g., time-lapse seismic). InSAR requires continuous satellite coverage with consistent surface reflectivity (Vasco and others, 2020). In areas where there is snowfall, agricultural changes, or erosional features, the InSAR results will be uncertain and unreliable for elevation changes. To improve InSAR measurement sensitivity, reflectivity challenges can be mitigated by installing stable reflective monuments.

At the conclusion of the operating phase of the project, the monitoring program will permit an assessment of the long-term containment and stability of the injected CO₂ within the storage complex. This assessment is required to secure a certificate of project completion from NDIC. To this end, monitoring of the storage complex will continue following the cessation of CO₂ injection until it can be established that the injected CO₂ plume is stable.

4.1.9 Quality Control and Surveillance Plan

Minnkota has developed a quality control and surveillance plan (QASP) as part of the testing and monitoring plan. The QCSP is provided in Appendix D of this permit.

4.2 Emergency and Remedial Response Plan

Minnkota developed a comprehensive emergency and remedial response plan (ERRP) for the Tundra SGS site, indicating what actions would be necessary in the unlikely event of an emergency at the Tundra SGS site or within the AOR. The ERRP describes the potential affected resources and provides that site operators know which entities and individuals are to be notified and what actions need to be taken to expeditiously mitigate any emergency and protect human health, safety, and the environment (HSE), including USDWs.

This ERRP describes actions the operator of Tundra SGS shall take in the event of an emergency that could endanger any USDW within the project AOR during construction, operation, or postinjection site care. Such events may include unplanned CO₂ release or detection of unexpected subsurface movement of CO₂ or associated fluids in or from the injection zone.

This ERRP incorporates the risk analysis and evaluation of Tundra SGS, including monitoring wells, monitoring system, injection well network, and CO₂ flowline from the capture facility to the storage site. The ERRP is provided in Appendix E of this permit.

4.2.1 Description of Project Area

The Tundra SGS site includes mostly land associated with the coal-mining operation from BNI Coal, the area where MRYS is located, and land primarily used for agriculture activities (Figure 4-11). The closest highly populated area is Center, North Dakota, which is approximately 3.3 mi northwest of the Tundra SGS site.

The Tundra SGS project area consists of existing groundwater wells varying in type/use and located in shallow aquifers ranging in depth. Two wells penetrate the Fox Hills Formation (deepest USDW) and will be sampled (preinjection, operational, and postoperational) for periodic monitoring (ID 14108411AA and ID 14208424BBA). In addition, Minnkota will be installing a Fox Hills Formation monitoring well (NRDT-1) at the injection wellsite (McCall-1). Detailed information on the freshwater resources and protection of USDWs in the AOR can be found in Section 3.4 Protection of USDWs.

Section 2.6 in the Geologic Exhibits addresses any potential mineral zones within the project area.

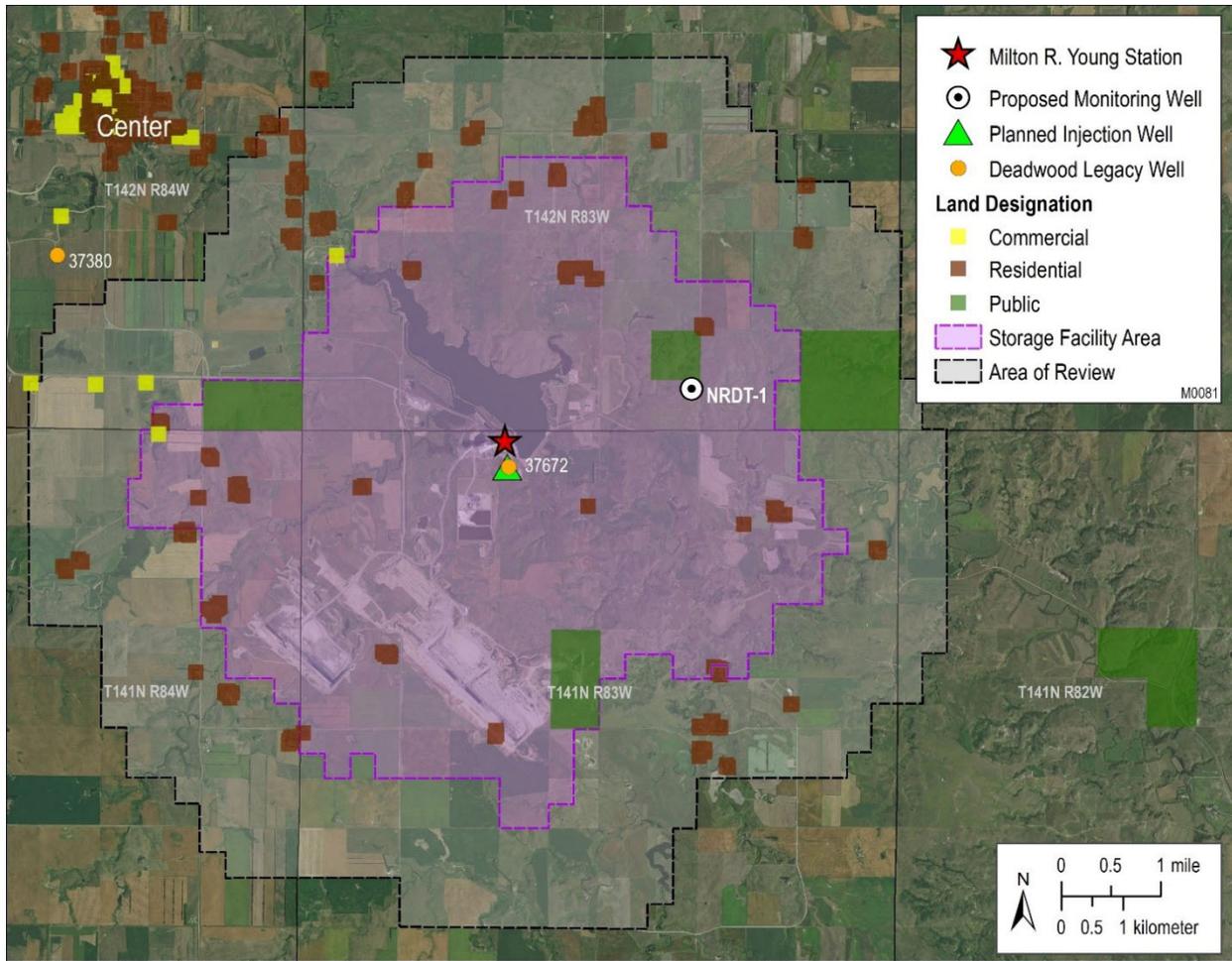


Figure 4-11. Residential, commercial, and public land use within 1 mi of the storage facility boundary.

4.2.2 Risk Identification and Severity

Several scenarios could activate an emergency response. This ERRP considers any adverse incident with the potential of causing personal injuries, USDW contamination, or property damage as an “event.” The scope of response, actions, and order of activities will be proportional to the severity and impacts of the event and implemented as outlined in this ERRP. The events identified during technical reviews for the Tundra SGS are listed in Table 4-9. Appendix E contains a response protocol for each event identified in Table 4-9. The protocols may be modified and refined based on the specific circumstances and conditions of the event as well as any discussion with governmental authorities having jurisdiction.

Table 4-9. Risk Category Matrix

<p>Construction Period</p> <ul style="list-style-type: none"> • Well control event while drilling or completing the well with loss of containment • Movement of brine between formations during drilling • Presence of H₂S while drilling or completing the well
<p>Injection Period</p> <ul style="list-style-type: none"> • Loss of mechanical integrity (flowlines, injection, monitoring wells, disposal well) • Loss of containment (LOC): vertical migration of CO₂/brines via injection wells, monitor wells, Class I wells, P&A wells, and undocumented wells • LOC: lateral migration of CO₂ outside of defined AOR • LOC: vertical migration due to failure in the confining zone, faults, and fractures • External impact in flowlines, wells, and infrastructure • Monitoring equipment failure or malfunction • Induced seismicity • Seismic event • Other natural disaster
<p>Postinjection Site-Care Period</p> <ul style="list-style-type: none"> • Loss of mechanical integrity (monitoring wells) • LOC: vertical migration of CO₂/brines via monitoring, wells, Class I wells, P&A wells, and undocumented wells • LOC: lateral migration of CO₂ outside of defined AOR • LOC: vertical migration due to failure in the confining zone, faults, and fractures • External impact in monitoring wells • Monitoring equipment failure or malfunction • Natural seismicity • Other natural disaster

Event severity is classified as major emergency, serious emergency, and minor emergency, according to the Table 4-10 description.

Table 4-10 Severity Matrix

Consequence Degree of Severity	Definition
Major Emergency	Event poses immediate substantial risk to human health, resources, or infrastructure. Emergency actions involving local authorities (evacuation or isolation of areas) should be initiated. Example: well blowout while injecting
Serious Emergency	Event poses potential serious (or significant) near-term risk to human health, resources, or infrastructure if conditions worsen or no response actions are taken. Example: malfunction of monitoring equipment for pressure or temperature that may indicate a problem with the injection well and possible endangerment of public health and the environment
Minor Emergency	Event poses no immediate risk to human health, resources, or infrastructure. Example: higher pressure reading observed in monitoring wells, with no potential to move fluid

If information from the monitoring network, alarm system, field operators, or external reports evidences a potential leak of CO₂ or formation fluids from any well or surface facility including any pressure change or monitoring data which indicates the presence of a leak or loss of containment from the storage reservoir or concern for the mechanical integrity of the system, the following actions will be taken:

1. The project will activate the emergency and remediation response protocol consistent with this ERRP and circumstances of the event.
2. The NDIC Department of Mineral Resources (DMR) Underground Injection Control Program director (UIC program director) will be immediately notified within 24 hours of the event being discovered.

The UIC program director may allow the operator to resume injection prior to remediation if the storage operator demonstrates that the injection operation will not endanger USDWs.

4.2.3 Response Protocols

Discovery of an event triggers the corresponding response plan proposed in herein. Response plan actions and activities will depend upon the circumstances and severity of the event. The Tundra SGS operator will address an event immediately and, when required, will communicate the event to the UIC program director within 24 hours of discovery.

The protocols described in this document are conceptual and may be adjusted based on actual circumstances and conditions of the event and any previous communication with governmental authorities having jurisdiction.

If an event triggers cessation of injection and remedial actions, Tundra SGS shall demonstrate the efficacy of the response actions to the satisfaction of the UIC program director before resuming injection operations. Injection operations shall only resume upon receipt of written authorization of the UIC program director.

For each of the scenarios identified in the risk screening, a detailed description of the mitigation and monitoring techniques is included in Appendix E.

4.2.4 Emergency Contacts

If an event is discovered, the Tundra SGS superintendent and HSE supervisor on duty will be notified immediately. The superintendent will be responsible for notifying off-site emergency response agencies and resources (Table 4-11). The superintendent shall also be responsible for notifying the UIC program director (Table 4-12) within 24 hours of initial discovery. Additional emergency response providers are listed in Table 4-13.

Table 4-11 Outside Emergency Response

	Agency	Location	Phone
Fire	Oliver County Rural Fire Protection District (volunteer department)	106 East Main Street, Center, ND	Phone: 911 or 701.794.3210
Ambulance	Oliver County Ambulance Service (volunteer basic life support service)	111 Main Street, Center, ND	Phone: 911– Ambulance Garage 701.794.8828 Cell 701.220.1329
Helicopter Air Care (MRYS ERT trains with Sanford AirMed and can be requested if needed, based on emergency)	Sanford AirMed	Bismarck, ND	Phone 911 or Sanford AirMed Dispatch 1.800.437.6886 Sioux Falls, SD, Office 844.424.7633
State Police	North Dakota Highway Patrol	600 East Boulevard Avenue Bismarck, ND	Phone: 911 or State Radio Dispatch 701.328.9921 Office 701.328.2447
Sheriff	Oliver County Sheriff Dave Hilliard	PO Box 362, Center, ND	Phone 911 Office 701.794.3450
Emergency Response Team (ERT)	MRYS Emergency Rescue Team	3401 24th Street Southeast, Center, ND	Phone 701.794.8711 or use the Plant Gaitronics intercom system to call “U1 Control Room” and report the emergency. The operator will sound the alarm for the ERT.

Table 4-12. NDIC DMR UIC Contact

Company	Service	Location	Phone
NDIC DMR	Class VI/CCUS Supervisor	Bismarck, ND	701-328-8020

Table 4-13. Potential Contractor and Services Providers (name available)

Company	Service	Location	Phone
Baranko Brothers	Excavation & Dirt Work/Hauling	Dickinson, ND	701-690-7279
Cyclone	Drilling rig	Gillette, WY	307-660-2370
Enerstar	Housing & Rentals	Bismarck, ND	701-934-1557
GeothermEx	Site Management/Drilling Supervisor Services	Houston, TX	281-769-4517
Schlumberger	Cementing,	Denver, CO	720-272-5288
	Core Analysis	Houston, TX	801-232-5799
	Direction & Measurements	Denver, CO	484-522-8434
	Products & Services	Denver, CO	517-755-9050
	Cameron Surface	Denver, CO/Minot,ND	970-260-4260
	Bits	Denver, CO/Williston, ND	303-518-6135
	Completions	Houston, TX	440-391-2711
Reservoir Group	Coring	Denver, CO/Houston, TX	832-350-5292
Rud Oil	Diesel	Center, ND	701-794-3165
Go Wireline	Wireline Tool/Fishing Services	Dickinson/Williston, ND	406-480-1086
MI SWACO	Drilling Fluids		661-549-3645
Sunburst Mudlogging	Logging/Geologic Services	Billings, MT	406-860-1228
Innovative Solutions	Solids Control	Williston, ND	701-770-0359
WellPro Inc	Fishing Equipment	Dickinson, ND	701-227-3737
Creek Oilfield Services	Waste Disposal/Casing Runnig/Supply	Williston/Bismarck, ND	701-590-5859 715-563-7543
Environmental Solutions	Cuttings Disposal	Belfield, ND	701-300-1156
Waste Management	Trash	Bismarck, ND	701-214-9741
ASK Transportations	Bulk fresh Water	Williston, ND	701-580-5627
Darby Welding	Welding	Dickinson, ND	701-483-5896
Panther PPT	Bop testing	Watford, ND	701-227-3737
Wyoming Casing	Casing Services	Williston, ND	701-290-8522
CCS	Tank Farm	Cody, WY	701-260-7780
MVTL Lab	Formation Fluids Collection	Bismarck, ND	701-204-5478
Petroleum Services	Casing (Float, Centralizer)	Williston, ND	701-770-1763

4.2.5 Emergency Communications Plan

Prior to the commencement of CO₂ injection operations, the Tundra SGS operator will communicate in writing with landowners living adjacent to the storage site to provide a summary of the information contained within this ERRP, including, but not limited to, information about the nature of the operations, operator contact list, potential risks, and possible response approaches.

An emergency contact list will be maintained during the life of the project. In the occurrence of an event, the superintendent will start the contact list and make sure that responsible, essential personnel are contacted. The operator's designated personnel will handle all event communications with the public.

The Tundra SGS operators will communicate adequate information to the public about any event to allow public understanding to the extent reasonably practicable, considering the circumstances leading to the event and any known environmental or safety implications. The amount of information, timing, and communications method(s) will be appropriate based upon the circumstances and severity of the event, which may include, but is not limited to, the following:

1. Event description and location.
2. Event investigation process, and response status (e.g., actions taken).
3. Whether there is any known impact to the drinking water or other environmental resources.
4. Any known injury to a person or property.

For protracted responses (e.g., passive monitoring or ongoing cleanups), the project will provide periodic updates on the progress of the response action(s).

4.2.6 ERRP Review

ERRP will be reviewed no less than:

- a. Annually.
- b. Following any significant changes to the Tundra SGS facility, such as AOR reevaluation or addition of injection or monitoring wells, on a schedule determined by the UIC program director.
- c. When required by the UIC program director.

If the review indicates that no amendments to the ERRP are necessary, the Tundra SGS operator will provide the documentation supporting the "no amendment necessary" determination to the UIC program director.

If the review indicates that amendments to the ERRP are necessary, amendments shall be made and submitted to Tundra SGS as soon as reasonably practicable, but in no event later than 1 year following the commencement of a review.

4.3 Financial Assurance Demonstration Plan

The FADP has been prepared in accordance with NDAC § 43-05-01-09.1. The FADP describes actions the operator of Tundra SGS has taken and shall take to ensure state and federal regulators that sufficient financial support is in place to:

- a) Cover the cost of any corrective action that may be required at the geologic storage facility during any of its phases of operation, well plugging, postinjection site care and facility closure, ERR, and endangerment to USDWs.
- b) Provide funds for routine monitoring and reporting activities by Minnkota during injection operations, closure activities, and an extended postclosure period as determined by regulatory agencies

While there are two separate storage reservoirs, these two separate reservoirs are commonly operated as dedicated Tundra SGS for a single CCS facility. The FADP was prepared to account for the entire operation of the Tundra SGS.

This FADP takes into account Tundra SGS storage facility permits and associated Class VI drilling permits in satisfying NDIC regulations contained in Title 43, Chapter 5, et seq. In preparing the FADP, U.S. Environmental Protection Agency (EPA) guidance was also considered in assessing the effectiveness of multiple qualifying financial instruments in the context of the Tundra SGS project, e.g., key aspects of long-term public confidence, optimization of stakeholder interests, and practicality of implementation.

Based on review and consideration of the available financial instruments contained in NDAC § 43-05-01-09.1, Minnkota proposes to use a combination of commercial insurance and a trust fund to fulfill the FADP requirements of the Class VI permits. The details contained in this FADP, along with supporting documentation, establish the approach Minnkota proposes to use to meet the financial responsibility requirements and that each of these instruments sufficiently addresses the activities and costs associated with the corrective action plan, injection well-plugging program, postinjection site care and facility closure, ERRP, and endangerment of USDWs.

Each of these instruments is described in full in subsequent subsections of this FADP and in Appendix G. Information related to the financial instruments will be updated on an annual basis and submitted to NDIC for review and approval as required under § NDAC 43-05-01-09.1.

4.3.1 Approach to Meeting Financial Responsibility Requirements

In accordance with the requirements contained in NDAC § 43-05-01-09.1, the FADP provides financial assurance sufficient to cover the activities identified in the corrective action plan, injection well-plugging program, postinjection site care and facility closure, ERRP and to address endangerment of USDWs. The following provides a summary description of the considerations and assessment approach for each component.

4.3.1.1 Corrective Action

According to § 43-05-01-05.1, corrective action involves inventorying and characterizing existing wells in the proposed AOR. The objective of corrective action assessment is planning actions to

take, prior to and over the course of the project operation, on existing wells in order to proactively prevent the movement of fluid into or between USDWs. The detailed AOR can be found in Section 3.0 of this application. Minnkota has determined and asserts that there are no wells in the proposed AOR to which corrective action would be required prior to or during the course of the project operation or postclosure period. For the avoidance of doubt, if wells proposed as part of Tundra SGS operation require corrective action, such action and the costs relating thereto are included as part of the project operating cost.

4.3.1.2 Injection well plugging program

The plugging of injection wells as part of site program closure and as required by NDAC § 43-05-01-11.5 is included within the project cost and is covered within this FADP and proposed instruments. The specifics of the plugging program can be found in Section 4.6. Costs were estimated using work scopes provided by third-party industry experts and comparable actual third-party costs for performance of services and procurement of associated goods. These costs shall be disbursed through the trust as described herein, while the amount associated with well plugging shall be funded following commencement of the operation of the wells. The estimate covers the aggregated cost of abandoning three injector wells, including rig mobilization, rig rentals, cementing, logging and haulage. To ensure a conservative estimate, a 20% contingency was added, and no deductions were made for salvage value of materials.

4.3.1.3 Postinjection site care and Facility closure

Postinjection site care (PISC) and facility closure cost estimates include site monitoring and periodic reassessment of the AOR, facilities maintenance and power costs, and overhead and support costs. Details of the activities and actions contained in the PISC can be found Section 4.0. The largest element of the PISC cost estimate relates to seismic studies, which are required to be carried out at 5-year intervals to validate seismicity models, which are expected to cover an area of up to 25 mi².

4.3.1.4 Emergency and remedial response

The ERRP and associated detailed assessment can be found in Section 4.0. The ERRP assessment supports a determination that the likelihood of release of significant volumes of CO₂ from underground storage into the soil or the atmosphere, or significant volumes of saltwater into the environment, are considered remote. Multiple factors were considered in the development of the ERRP, including:

- a) Extensive and independently verified analysis of the integrity of the storage mechanism.
- b) Selection of qualified and experienced storage facility operator.
- c) Selection of qualified and experienced drilling contractor.

Risk mitigation measures include:

- a) Location of injection facilities away from urban population and in an industrial-zoned, brownfield property.
- b) Continuous monitoring of transportation and injection systems.
- c) Routine measurement and reporting of CO₂ volumes.

- d) Physical security, barriers and signage around injection facilities.
- e) Primary and secondary containment for leaked fluids at injection well pads.

In the interest of providing sufficient financial assurance, Minnkota has compiled cost estimates associated with a conservative hypothetical scenario wherein a significant volume of briny water arises to the surface injection operations. The scenario contemplates a reactive response approach; e.g., mobilization of response personnel and equipment would be upon discovery of such an event. This approach is considered appropriate because of the remoteness of the residual risk. Specific postoccurrence action is not determinable until occurrence; thus actual response to such an event would be based on its severity. Because of the remote likelihood, this single conservative scenario was compiled to account for the outer-limit cost estimate to satisfy event response. The scenario used for cost estimating assumed the optimal operating conditions (10 years of operation) requiring outer limit response and remediation costs. This conservative outer limit cost estimate was calculated and used as a basis for this FADP document.

Dual Utilization of the ERRP Trust Property

Upon authorization from NDIC to begin injecting CO₂ under the Class VI well permit(s), Minnkota must be prepared to undertake any emergency or remedial response (ERR) actions, although such actions are unlikely to be needed. Further, in accordance with North Dakota Century Code (NDCC) § 43-05-01-17, Minnkota must account for a one cent fee on each metric ton of carbon dioxide for administration of a storage facility fund and a fee of seven cents on each ton of CO₂ injected for a storage facility fund which can be utilized for post closure period activities (together referred to as “commission fee”). The average projected amount of CO₂ injected will be 4 MMt annually. Minnkota estimates a minimum of 12 years of operation and is permitting operation of the storage facility for 20 years of injection. Minnkota therefore estimates being required to pay a commission fee of \$320,000.00 annually, with a total commission fee of \$3,840,000.00 by year 12 of operation (\$6,400,00.00 is the cumulative commission fee by Year 20). Minnkota’s estimated total cost of ERR activities is \$16,560,000.00, assuming conditions allowing a conservative outer-limit cost estimate (at least 10 years of operation), with \$5,960,000.00 of the estimate funded by the trust. Since the ERR cost estimate exceeds the estimated 12-year commission fee¹ and ERR activities are unlikely to be needed, the account containing the ERR principal and any associated interest may be used at site closure for satisfying the commission fee and commission required closure activities calculated under NDCC § 43-05-01-17. Therefore, Minnkota proposes the account containing the ERR principal and any associated interest to be used at closure (or termination of the trust) to satisfy the commission fee. The trust agreement would allow the trustee to release an amount equal to the total commission fee upon written direction of NDIC from the principal and interest contained in the ERR account in an amount equal to the fee calculated in accordance with § 43-05-01-17 at the time NDIC issues the certificate of closure or termination of the trust, whichever occurs first.

Minnkota proposes that the account associated with the ERR account should be funded with an initial amount sufficient to cover the costs associated with the ERR activities upon issuance of authorization to operate a Class VI injection well. Minnkota proposes an initial funding of an amount equal to the net of the cost estimate for ERR activities less the calculated 12-year commission fee based upon the projected annual average injection rate of 4 MMt, \$2,120,000.00.

¹ Commission fee would not exceed the fund principal amount until Year 18 of operation.

Minnkota will fully fund the ERR activities with seven equal installments annually of \$548,572.00 made in the injection period, with the first installment prior to the 1-year anniversary of NDIC's issuance of authorization to operate a Class VI injection well and the remaining installments to be made individually on the successive anniversary until fully funding the principal amount of \$5,960,000.00. However, if at any time NDIC determines the amount of the commission fee exceeds the principal amount then contained in the ERR account, then upon written direction from NDIC, grantor shall fund amounts sufficient to cover the commission fee calculated in accordance with NDCC § 43-05-01-17.

4.3.1.5 Endangerment of Drinking Water Sources

As discussed in the ERRP subsection, the risk of endangerment to USDW is considered remote. However, as part of the reactive response scenario contemplated in the ERRP cost estimate, Minnkota assessed the specific response actions and cost data to represent the likely impact of such an event on sources of drinking water. Because of precautions taken in the design for spill control and pollution prevention, the well pad design incorporates two liners and a berm that, in combination with the response strategy, would minimize this portion of environmental repair. Thus Minnkota assessed the second reactive scenario, which contemplates a subsurface leak scenario. This subsurface leak scenario has primary costs relate to groundwater delineation and an extended period (10 years) of quarterly monitoring and reporting after emergency remedial actions are taken.

4.3.2 Approach to Financial Risk

Minnkota formed a task force (TF) to understand and quantify project risks. The TF consisted of 14 members with relevant professional qualifications and experience in subsurface analysis, facilities engineering, drilling engineering, operations, finance, environmental protection, or risk engineering. The TF identified and quantified the likelihood and impact of multiple risks using industry-standard methodology and methods. Four working sessions, each between 3 and 4 hours in duration, were conducted, and the TF reached consensus on the assessment of risks underlying various aspects of the project. The findings of the TF support the understanding of financial risks and the approach to FADP described in this document.

4.3.3 Selected Elements of Minnkota's Analysis of Inherent Risks

The projected AOR includes mostly land associated with the coal-mining operations of BNI, the area where MRYS is located, and land primarily used for agriculture activities. Residents and man-made structures are scattered across the surface. The closest highly populated area is the town of Center, North Dakota, approximately 3.3 mi northwest of the proposed Tundra SGS facility boundary.

From the surface to the lowermost USDW—the Fox Hills Aquifer—the groundwater is considered a protected aquifer with <10,000 ppm TDS. The Fox Hills base is estimated at approximately 1,000 ft and is followed by a thick section of clays with a thickness of approximately 2,600 ft. These clays act as a seal until the next major permeable zone, the Inyan Kara. The Inyan Kara is an underpressured formation that is classified as an exempt aquifer under NDCC § 43-02-05-03 west of the 83W range line, and this formation is mostly targeted for water disposal wells in those areas. Approximately 900 ft of cap rock acts as a main seal between the Inyan Kara zone and the shallowest of the two injection reservoirs: the Broom Creek.

Inside the AOR, 64 water wells are located in shallow aquifers, providing water for the associated farms' livestock, irrigation, and localized consumption. Two wells that penetrate the Fox Hills Formation will be used as tools for monitoring the USDW (ID 14108411AA and ID 14208424BBA). The project will install one additional USDW well, as described in the monitoring plan, to sample underground water.

No producible mineral, oil, natural gas, or other reserves are reported in the AOR for the Deadwood Formation or overlying formations. As described in the AOR and corrective action section, for the Tundra SGS storage reservoir and drilling applications, there are three deep wells (one oil and gas [O&G] exploration, two stratigraphic) within or in proximity to the plume boundaries and the identified pressure front: these wells are identified as BNI-1 (API 33065000180000), Herbert Dresser 1-34 (API 33065000050000), and J-LOC1 (33065000190000). J-LOC1 will be converted to a pressure monitoring well for Tundra SGS or will be permanently abandoned, and the other two wells were analyzed and included in the risk assessment as well as in the corrective action plan.

4.3.4 Cost Estimates

Tables in this section provide a detailed estimate, in current dollars, of the cost of performing corrective action on wells in the AOR, plugging the injection well, postinjection site care and facility closure, and ERR. Table 4-14 is a summary of the cost estimates underlying the FADP document, identifying proposed financial instrument(s) that will provide the appropriate assurance to regulatory agencies of Minnkota's intent and ability to fulfil its responsibilities.

Cost estimates assume that these costs would be incurred if a third party were contracted to perform these activities. For that reason, the estimate includes costs such as project management and oversight, general and administrative costs, and overhead during the postinjection period, e.g., the use of postinjection seismic surveys.

Table 4-14. Potential Future Costs Covered by Financial Assurance in \$K

Activity	Total Cost	Covered by Special-Purpose Trust	Covered by Commercial Insurance	Details in Supporting Table
Corrective Action on Wells in AOR	\$0	\$0	\$0	NA
Plugging Injection Wells	\$2,025	\$2,025	\$0	Table 4-14-1
Postinjection Site Care	\$10,285	\$10,285	\$0	Table 4-14-2
Site Closure	\$1,554	\$1,554	\$0	Table 4-14-3
Emergency and Remedial Response	\$16,560	\$5,960	\$10,600	Table 4-14-4
Endangerment of USDWs	\$2,240	\$0	\$2,240	Table 4-14-5
Total	\$32,664	\$19,824	\$12,840	

The values included in the FADP are based on cost estimates provided during the permit application development process and are based on the hiring of a third party to perform the services or procurement of goods associated with performance. Cost estimates are based upon historic price data from other projects managed by Oxy Low Carbon Ventures (OLCV), cost quotes from third-party companies, regulatory guidance documents, and professional judgment about the level of effort required to complete an activity. These values are subject to change during the course of the project to account for inflation of costs and any changes to the project that affect the cost of the covered activities. If the cost estimates change, Minnkota will adjust the value of the financial instruments, and any adjustment will be submitted for approval by NDIC as required under NDAC § 43-05-01-09.1(3).

Tables 4-14.1 through 4-14.6 provide detailed breakdowns of the future cost estimates provided in Table 4-14.

Table 4-14-1. Plugging Injection Wells

Activity	Cost
Mobilization and Location	\$435,000
Rig Rates and Daily Cost	\$467,000
Hauling and Disposal	\$57,000
Balance of Plant	\$
Hydrostatic Testing and Scanning	\$
Pipe Rental	\$
Bit and Scrapers	\$
Logging	\$105,000
Casing Crew and Torque	\$40,000
DST Service and Manifold	\$
Sensors and Fiber Optic	\$60,000
Cementing	\$353,000
Perforating Cost	\$
Pumping Truck and Acid	\$
Wellhead Service	\$60,000
Tangibles	\$
Subtotal	\$1,577,000
Contingency	20%
Tax	7%
Total Cost	\$2,025,000

Notes:

- Costs are based on estimates of current contract day rates and materials.
- Costs are based on P&A of a total of three injector wells: two in the Broom Creek Formation and one in the Deadwood Formation.

Table 4-14-2. Postinjection Site Care

Activity	Cost
Monitoring and AOR Revisions (see Table 4-14-3)	\$7,197,000
Overhead and Support	\$1,388,000
Facilities Maintenance and Power	\$1,700,000
Total	\$10,285,000

Notes:

- Costs are based on estimates of current contract day rates and materials.
- Postinjection seismic survey conducted at 5-year intervals.

**Table 4-14-3. Monitoring and AOR Revisions
(part of postinjection site care)**

Activity	Cost
Gas Soil Probes	\$716,000
3D Seismic Survey – Time Lapse	\$5,000,000
Water Sampling	\$180,000
Saturation Log Monitoring Wells	\$819,000
Annular Pressure Test	\$100,000
AOR Assessment	\$86,000
Casing Inspection Log Monitoring Wells	\$160,000
Optical Gas Imaging	\$72,000
Visual Inspection	\$64,000
Total	\$7,197,000

Table 4-14-4. Site Closure

Activity	Cost
Monitoring Well P&A	\$764,000
Facilities Closure	\$1,020,000
Total Site Closure	\$1,784,000

Notes:

- Costs are based on estimates of current contract day-rates and materials.
- Costs are based on P&A of two monitoring wells.
- Facilities closure estimate includes abandonment in place of buried pipelines.

Table 4-14-5. Emergency and Remedial Response

Activity/Item	Cost
Pump Trucks (twin pump)	\$113,784
Frac Tanks	\$48,000
Vacuum Truck	\$36,000
Dozer	\$18,600
Excavator	\$20,400
Dump Truck	\$32,400
Brine Disposal (no Class I)	\$1,000
Trucking Water	\$11,000
Water Transfer Pump and Personnel Package	\$11,600
Light Towers, Trailers, Generator, Heaters, Communications, etc.	\$7,690
Heater Packages	\$36,000
Fuel Tank Storage	\$3,400
Drill and P&A Relief Well in Broom Creek	\$8,760,000
Special Well Control Team – (e.g., wild well/boots & coats)	\$1,500,000
New Injector Well – Replacement (mob, drill and comp.)	\$5,060,000
Original Injector Well Abandonment	\$900,000
Total	\$16,559,874

Notes:

- These costs are based on activities in response to a hypothetical scenario with remote risk of occurrence.
- A significant portion of these costs, should they be incurred, would be covered by commercial insurance which is an industry standard control of well (COW) coverage.
- Costs are based on estimates of current contract rates.

Table 4-14-6. Endangerment of USDWs

Description	Total Estimated Amount
Subsurface Release to USDW	
General Response Actions	\$6,000
Groundwater Delineation	\$1,290,000
Irrigation/Domestic Well Sampling and Replacement	\$131,000
Quarterly Groundwater Monitoring (10 years) and Reporting	\$760,000
P&A of Groundwater-Monitoring Wells	\$53,000
Total	\$2,240,000

Notes:

- These costs are based on activities in response to a hypothetical scenario with remote risk of occurrence.
- Costs are based on estimates of current contract rates.

4.4 Worker Safety Plan

The worker safety plan (WSP) describes the minimum safety programs, permit activities, and training requirements to deploy during construction, operation, and postinjection site care periods. This document does not limit the application of additional programs and technologies that could improve the safety and performance of the operation.

This WSP incorporates the safety program for the Tundra SGS as a whole. It includes monitoring wells, monitoring system, injection well network, and CO₂ flowline of the storage facility.

4.4.1 Definitions

a. Confined space means a space large enough and so configured that an employee can bodily enter and perform assigned work, has limited or restricted means for entry or exit (for example, tanks, vessels, silos, storage bins, hoppers, vaults, and pits or spaces that may have limited means of entry), and is not designed for continuous employee occupancy. This definition could also apply to a trench, bellhole, cellar, or excavation.

Some confined spaces are designated permit-required confined spaces: meaning entry into the space must be controlled through application of a confined space entry permit. A “yes” answer to *any one* of the following questions means the space must be designated “permit-required”:

- Does the space contain, or have the potential to contain, a hazardous atmosphere?
- Does the space contain a material that has the potential for engulfing an entrant?
- Does the space have an internal configuration such that an entrant could be trapped or asphyxiated by inwardly converging walls or a floor that slopes downward and tapers to a smaller cross section?
- Does the space contain any other recognized serious safety or health hazard?
- The confined space entry (CSE) program is provided to protect authorized employees and contractors that will enter permit-required confined spaces.

b. Contractor means a company or person performing work, providing services, or supplying equipment at the work site, including its subcontractors.

c. Hazardous energy means energy sources, including electrical, mechanical, hydraulic, pneumatic, chemical, thermal, or other sources in machines and equipment, where the unexpected start-up or release of stored energy can result in serious injury or death.

d. Operator means the Tundra SGS or any Tundra SGS employee.

e. Permitted work activities means activities that require the use of a permit, including but not limited to, confined space entry, lockout/tagout, trenching and excavation, electrical, and hotwork, which require the use of a permit.

f. Site manager/supervisor means the operator designated representative in charge of the work site or work.

g. Work site means physical location under control of the operator where work is being performed on behalf of the operator.

h. Work means task or tasks to be executed by the operator or contractor.

i. Visitor means a person or person(s) present at the work site who are there for observational, not work purposes.

4.4.2 Stop Work Authority

Each operator and contractor has the right, obligation, authority, and responsibility to stop any work or action that is unsafe or, if continued, may result in adverse impact to the environment. No operator employee or contractor will be subject to discipline or sanction for stopping any work or

action that they believe in good faith is unsafe or may result in adverse impact to the environment. Work must be stopped in a safe manner and immediately reported to the site manager/supervisor or operator representative. Appropriate actions will be taken to mitigate the hazard before the work will be allowed to commence. Every contractor will have a stop work authority program that advises their employees of their rights to use stop work authority.

4.4.3 Incident Notification and Response

The operator employee or contractor shall be required to immediately notify the site manager/supervisor (or designated operator representative) of all incidents involving injury or illness to a contractor, damage to operator or contractor equipment as a result of contractor activities at the work site, and any spill, release, or leak. Prompt investigation is required of all injuries, illnesses, equipment or property damage, environmental spills/releases, and other HSE-related incidents.

Unsafe conditions must be immediately reported to the operator. “Near-miss” incidents that could have resulted in injury or damage must be reported by the operator employee or contractor to the site manager/supervisor (or designated operator representative).

4.4.4 Incident Report and Investigation

An initial preliminary written incident report for all workplace incidents shall be submitted within 24 hours of occurrence, with known facts, to the site manager/supervisor (or the designated operator representative).

An investigation will be started as soon as possible following notification into all injuries, illnesses, equipment or property damage, leak, spill or release, or other HSE-related incidents. A written interim incident investigation report for all incidents will be provided every 7 calendar days until the final incident report is submitted to the site manager/supervisor (or the designated operator representative). The operator may participate in any investigation of incidents at any work site and will be permitted to reproduce all work site audits and incident investigations for the purposes of correction, training, investigation, and root cause analysis.

The final incident report shall include, at minimum, description of the incident, location, chronology, injury details, Occupational Health and Safety Administration (OSHA) classification, impact on people and the environment, protective equipment performance assessment, review of the process (design, operation, maintenance, and administrative control), identification of root cause, and recommendation for corrective actions. The operator shall provide timely notification to the site owner of all incidents involving injury or property damage and will provide weekly reports to the site owner that identify all incidents reported in the prior week.

All incident reports that result in formal notification to any government entity or authority shall be provided to the operator. Additionally, any investigations, inspections, or penalties assessed on the contractor by any government entity or authority, relating to or in connection with any work performed for the operator, shall promptly be provided to the operator.

4.4.5 Training

The contractor shall receive training related to health and safety, operational procedures, and emergency response according to the roles and responsibilities of their work assignments. Initial training shall be conducted by, or under the supervision of, an operator site supervisor/manager or an operator-designated representative. Trainers must be thoroughly familiar with the operations plan and ERRP.

The contractor shall conduct a training needs assessment that is representative of the contracted work site assignments. The contractor shall establish the type and frequency of training in a role and responsibility matrix by position (matrix). The contractor shall ensure that personnel have been given all core and special training identified in the matrix.

However, the following are minimum requirements regardless of position or work:

- All newly hired personnel need to attend onboarding training for the work site and fulfill the safety training according to the position before starting on the job.
- All operation employees shall participate in annual training to teach or reinforce how to perform the job, equipment functioning, and instrumentation.
- All employees shall participate in an annual refresher training for the emergency response procedures contained in the ERRP.
- Monthly briefings shall be provided to operations personnel according to their respective responsibilities and shall highlight recent operating incidents, actual experience in operating equipment, and recent storage reservoir monitoring information.
- Documentation of all training shall be retained by the contractor and made available for operator inspection upon request.

4.4.6 Contractor Qualification and Bridging Documents

The contractor shall have a qualification program and auditing process to ensure personnel are held to the same safety standards or higher than operator standards. A bridging document shall be created to align the safety program between operator's and contractor's policies if required.

4.4.7 General Health, Safety, and Welfare

The work site must be maintained so as not to create or otherwise contribute to an unhealthy working or living environment. To accomplish this objective, the operator and contractor shall ensure the following:

Information/Posting/Signs. All emergency, safety and operational information/postings/signs shall be communicated in a format to ensure comprehension by the operator and visitors or contractors on the worksite in accordance with OSHA 29 Code of Federal Regulations (CFR) 1910.145, country, state/province, local, or international equivalent.

Job Safety Analysis. The contractor shall complete and review, with all affected parties, a job safety analysis (JSA) prior to performing any work. Anytime the job scope or conditions change, the contractor shall review and revise (if needed) the JSA with all affected parties.

Prejob Meeting. On work sites where simultaneous operations (SIMOPS) shall be conducted, daily prejob planning meeting(s) shall be held involving representatives from all potentially affected parties.

English Language Proficiency. At least one person per crew or work group assigned to the task must be fully capable of communicating in the English language (both in a verbal and written manner) such that they can perform the work safely. If required, an interpreter shall be provided.

Short Service Or New Hire. Short service personnel or new hires without experience shall be mentored and supervised by a senior professional and uniquely identified in the field (stickers and unique color hard hat). The employee shall fulfill core training before starting activities on the work site. Documentation of such mentoring/training must be retained and available for inspection upon request.

Medical Fitness/Personal Hygiene. Personnel shall be medically fit to safely perform the work they are expected to perform. The operator may audit to ensure that personnel maintain appropriate standards of personal hygiene during performance of the work.

Housekeeping. The contractor shall ensure good housekeeping practices are conducted at the work site by all personnel to provide for a safe and orderly working environment. Aisles, emergency exits, and controls must be always kept free of obstacles.

Machine Guarding. The contractor shall ensure that all equipment machine guarding (permanent, temporary and portable) is properly installed and maintained. Before removing guards to service guarded equipment, which should be isolated, locked out, tagged out, and verified to be nonfunctioning, see lockout/tagout procedure.

Portable Hand Tools. All portable hand tools shall have proper insulation, grounding, and guarding, in accordance with manufacturer requirements. All portable tools shall be properly maintained and used based on manufacturer original design and intended purpose. Tools shall be regularly inspected and damaged or worn tools shall be taken out of service. No homemade or modified hand tools shall be used on the work site.

Management of Change (MOC). The contractor shall have a formal MOC process implemented for all equipment (except for “replacement in kind”), process, and procedural changes. The contractor shall ensure no contractor’s equipment is used or modified outside of the original equipment manufacturer-design specifications.

Clothing and Other Apparel. Ragged or loose clothing and jewelry (rings, watches without breakaway nonmetallic bands, necklaces, exposed piercings, etc.) are not to be worn when on the work site. Any clothing that becomes saturated with hazardous chemicals should be promptly removed.

First Aid/CPR. The contractor shall ensure sufficient First Aid/CPR and defibrillator equipment and trained personnel (National Safety Council, American Heart Association,

Red Cross, etc.) are available at work site in accordance with OSHA 29 CFR 1910.151 or equivalent country, state/province, or local regulations. First Aid/CPR and defibrillator kit(s) containing an appropriate quantity of supplies shall be maintained on location at all times.

Transportation Safety. The contractor shall ensure that all modes of transportation are fit for purpose for travel to/from/within the work site. The contractor shall ensure compliance with all applicable country, state/province, and local regulations.

Industrial Hygiene

- The contractor will assess job duties to determine if hazards are present, or are likely to be present, which necessitate the use of engineering controls, administrative controls, or personal protective equipment (PPE).
- The contractor shall document this hazard assessment through a written certification that identifies the work site evaluated, person certifying that the evaluation has been performed, and date(s) of the hazard assessment. Documentation shall be retained by the contractor and made available to the operator upon request for inspection.
- Based on the results of this hazard assessment, the contractor may be required to perform an industrial hygiene assessment of the work site to determine the level of exposure to hazards (chemicals, lead, dust, noise, etc.).
- Appropriate measures shall be taken based on these assessments in order to safely manage operator, contractor, and visitor exposures.

4.4.8 Personal Protective Equipment

All contractors and visitors must wear appropriate PPE for the hazards present at the work site. Actual PPE requirements shall be determined in accordance with hazard/risk assessments, and safety data sheets (SDSs) must be provided for products that personnel might be exposed to at the work site (“Risk Assessment”).

The following PPE, at a minimum, must be used by all operators or contractors at the work site, along with the appropriate training in the proper use and care of such PPE:

- Hard hats
- Safety glasses with side shields
- Protective footwear (safety-toed boots)
- Personal monitor(s) as needed based on risk assessments for H₂S or other hazardous materials

The following is a list of PPE that, based on the hazard/risk assessment, might be required for the work site and applicable standards/certifications that apply:

- Respiratory protection meeting OSHA 29 CFR 1910.134, National Institute for Occupational Safety and Health (NIOSH)-certified.
- Head protection meeting American National Standards Institute (ANSI) Z89.1 Type 1, Classes E and G.
- Eye and face protection appropriate for the work environment and hazards meeting ANSI Z87.1.

- Foot protection meeting ASTM F 2413 or international equivalent standard.
- Hearing protection meeting ANSI S3.19 standard.
- Hand protection (gloves) appropriate for the work environment, exposure, and hazards.
- Flame-retardant clothing certified to National Fire Protection Association (NFPA) 2112/(NFPA 70E Arc Flash PPE category for personnel performing electrical work) (as identified by regulation or local company management including but not limited to 29 CFR 1910.132, 1910.269, and 1910.335; ASTM 1506; NFPA 70E, 2112, and 2113).

Fire protection. The contractor shall, based on a risk assessment, provide and maintain fire protection equipment for the work. Fire protection shall comply with all local regulatory or equivalent NFPA requirements and be dedicated for firefighting use only.

4.4.9 Hand Safety

The contractors shall have a hand safety awareness-training program targeting topics such as pinch points, hold points, soft grips, cutting devices, proper hand tools, hot/cold conditions, chemical handling, etc.

Selection of appropriate hand protection should be based on an evaluation of the performance characteristics of the hand protection relative to the task(s) to be performed, conditions present, duration of use, and hazards and potential hazards identified.

Contractors are required to use appropriate hand protection when they encounter the following hand hazards:

- Thermal
- Sharp materials
- Electrical current
- Chemical exposure
- Impact
- Abrasive materials

4.4.10 Permitted Work Activities

The following are considered permitted activities and require a permit to be executed:

- **Hot work.** Any work that may introduce any source of ignition where flammable vapors may be present or will generate sufficient heat to ignite combustible and/or flammable materials and these materials will support combustion once ignited.
- **CSE.** Any CSE conducted on operator property must be done under a permit-required confined space program, which shall identify methods to comply with the requirements of OSHA Standard 1910.146.
- **Lockout/Tagout Procedure.** When any hazardous energy scenario is encountered, including but not limited to the following during performance of servicing or maintenance of equipment:

- a. Removal or bypass of machine guards or other safety devices.
- b. Placement or positioning of any part of the body in contact with the point of operation.
- c. Placement or positioning of any part of the body in a danger zone associated with a machine's operating cycle.
- d. When the release of stored energy that could injure the operator, contractor, visitor, or a member of the public if the isolated device (e.g., valve, breaker, etc.) were to be operated by mistake.

The following safe work practices are required:

- a. Use of lockout/tagout controls to prevent the release of hazardous energy.
- b. The equipment must be deenergized, and locks and tags must be applied to the energy-isolating devices.
- c. All work involving isolation of hazardous energy must be done in accordance with 29 CFR 1910.147.

Excavation and Trenching. The contractor performing trenching and excavation activities on a work site must provide competent personnel capable of identifying existing and predictable hazards in the immediate surroundings. The contractor shall ensure that the competent person must be on-site during all excavation activities where the potential for injury exists. The competent person must also comply with all applicable OSHA construction regulations.

Preexcavation Notification Requirements. Injection and plant locations must have a means of receiving a written "ticket locate request" from a state one-call notification center. In addition, each location must have a 24-hour emergency telephone number, such as a plant location or answering service.

Electrical. The contractor performing electrical work activities shall provide qualified personnel. Qualified persons must be trained and knowledgeable of the construction and operations of the equipment or a specific work method and be trained to recognize and avoid the electrical hazards that might be present with respect to that equipment or work method.

Energized equipment to which a qualified or unqualified person might be exposed must be in an electrically safe work condition before an employee works within the limited approach or the arc flash protection boundaries. For cases where it is determined that the equipment cannot be placed in an electrically safe work condition, an energized electrical work permit must be completed and approved prior to commencing the work.

Energized work that is considered routine for diagnostic testing or troubleshooting is exempted from the energized electrical work permit requirements if there is an approved maintenance or operating procedure in place for the task.

Electrical Safety Program. The contractor shall have an electrical safety program that identifies the levels of all electrical and associated tasks to be performed and personnel position qualified to perform each of these tasks in accordance with OSHA/ National Electrical Code (NEC), American

Petroleum Institute (API) 500, NFPA 70E, or equivalent country, state/province, or local regulations.

Contractor electricians shall be qualified to perform electrical activities on contractor or operator equipment at the work site as required by local regulations or equivalent OSHA/NEC/NFPA 70E standards.

Contractors working in areas where there are electrical hazards shall be provided with and use protective equipment that is designed and constructed for the specific part of the body to be protected and work to be performed.

The contractor shall consider all overhead power lines to be energized unless proper measures have been taken for deenergizing. When work is being performed near energized overhead power lines, any part of the crane, boom, mast, gin poles, suspended loads, or machinery shall not be permitted within 10 ft (3 m) of the power lines. However, this safe working distance can be increased according to the voltage of the power lines (OSHA 29 CFR 1926.550, 1910.181, and 1910.269 or equivalent country, state/province, or local regulations).

The contractor shall ensure that all personnel will use only portable ladders, scaffolding, or other elevating devices made of nonconductive material when working around energized electrical equipment.

Precautions shall be taken to ensure that all equipment used is properly grounded and accidental contact with ungrounded electrical sources is prevented.

Contractor shall ensure all contractor electrical components, tools, and PPE are maintained in a safe working condition.

Temporary electrical power setup for the operation of tools and equipment shall be protected by ground fault circuit interrupter (GFCI) circuits.

4.4.11 Chemical, Hazardous, or Flammable Materials

SDSs. The contractor shall ensure that all chemical products/materials supplied to the work site are accompanied by the respective SDS upon delivery. The contractor shall provide the site supervisor/manager with an inventory of all chemical products/materials to be used along with copies of the related SDS documents. The operator shall have authority to prohibit any chemical product/material that is deemed unacceptable at the sole discretion of the operator.

The contractor shall instruct all personnel on the safe use of the chemical products/materials in accordance with an appropriate written hazard communication program as dictated by local/state/federal regulatory requirements.

The contractor shall ensure that SDSs for chemicals are reviewed by personnel prior to exposure.

Storage, Use, and Labeling of Chemicals, and Hazardous/Flammable Materials. The contractor shall ensure all hazardous and/or flammable materials/products are labeled, handled, dispensed and stored in accordance with OSHA 29 CFR 1910.106 and 1910.1200 or equivalent country, state/province, or local regulations.

All chemicals, paints, and hazardous/flammable materials shall be kept in appropriate containers, which are clearly labeled as to the respective contents, and stored in fit-for-purpose storage containers (uniquely identified, vented, etc.). Container labeling shall be consistent with OSHA, U.S. Department of Transportation (DOT), NFPA or equivalent country, state/province, or local regulation.

Hydrogen Sulfide. When the presence of hydrogen sulfide gas may exist at greater than 10 ppm in the wellbore, formation, facilities, or production stream, the contractor is responsible for ensuring that personnel are properly trained and qualified. Personal monitoring equipment shall be used by all personnel, and personal monitoring devices must be set to alarm at 10 ppm so that personnel are alerted to evacuate the area. The H₂S monitors shall be calibrated per manufacturer specifications, and at a minimum, personal H₂S monitors shall be “bump”-tested at least monthly.

4.4.12 Compressed Gas and Air Cylinders

Compressed gas cylinders shall be properly used, maintained, stored, handled, and transported as designated by OSHA 29 CFR 1910.101-106, 1910.252, 1910.253, and 1926.350 or equivalent country, state/province, or local regulations.

Compressed gas and air equipment shall be constructed in accordance with American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section VIII Edition 1968 or equivalent country, state/province, local or international laws or regulations. Equipment includes but is not limited to safety devices, flame arrestors, regulators, pressure gauges, check valves, pressure relief valves, labeling, etc.

All compressed gas cylinders shall be returned promptly to a suitable/designated storage area when not in use. Compressed gas cylinders shall be stored in the upright position and secured.

Protective caps shall be placed over the cylinder valves when not in use or being transported.

Compressed gas cylinders shall be stored away from heat, fire, molten metal, and electrical lines.

Compressed gas cylinders shall not be transported by mobile cranes unless a special carrier is used.

Oxygen and flammable gases shall be stored in areas separated by a minimum of 20 ft or fire barrier rated for 30 minutes.

Acetylene or liquid compressed gas cylinders shall never be used in a horizontal position, as the liquid may be forced out through the hose, causing a fire hazard or explosion.

Oxygen/acetylene cutting torch lines shall include flashback arrestors placed (at least) at the cylinder end. The preference is the arrestor be on the torch side.

Compressed air should not be used for cleaning clothing or parts of the body. If compressed air is used for cleaning, the discharge shall not exceed 30 psi (2.07 bar), and eye/face protection shall be worn.

4.4.13 Overhead/Outside Guarded Area

Lifting and Hoisting. When the contractor is working overhead, the area below shall be barricaded or other equivalent measures taken to protect workers on the work site. No one shall be permitted to pass under any suspended load.

Each lifting device shall identify the manufacturer, safe working load, service/manufactured date, and serial/identification number.

Lifting devices shall be managed in a formal maintenance program (i.e., in-service – out-of-service date, color-coding, rejection criteria, etc.).

Tail chains used on rig floor tuggers, winches, cranes, etc., must be attached to a certified lifting point and cannot be wrapped/choked around the load and/or back onto itself.

Tail chains are prohibited from use in all man-riding operations.

All other application of chains shall be consistent with original equipment manufacturer (OEM) ratings, design, and usage.

Lever-type load binders are prohibited for use on all work sites.

Homemade or modified lifting devices are prohibited for use on all work sites.

Tag lines shall be used when moving or lifting equipment.

Powered Lifting Device Safety. All contractors operating a powered lifting device (forklift, cranes, winches, gin pole trucks, etc.) shall maintain current certification/training in accordance with OSHA regulations or equivalent country, state/province, or local regulations. All powered lifting devices shall have a preuse inspection as required by local regulation or manufacturer recommendation.

Scaffolds or Platforms. All scaffolds or platforms used for installation and maintenance or removal of machinery and equipment shall be erected, maintained, and used in compliance with OSHA or a country, state/province, local, or international equivalent regulation. All scaffolds are to be inspected and tagged by a competent person prior to use and, subsequently, inspected by a competent person prior to each shift.

Safety Harnesses and Lifelines. When working outside of properly guarded work platforms, a full-body safety harness and lifeline, complete with shock-absorbing lanyard(s) or self-retracting lifeline, shall be provided by the contractor and worn by all workers when working above 6 ft (construction) or when walking on working surfaces higher than 4 ft (general industry) without proper guarding. The contractor shall have procedures, trained personnel, and equipment necessary to rescue workers who may be suspended from fall protection equipment following a fall.

4.4.14 Work Site Conduct

Firearms, Weapons, and Non-Work-Related Dangerous Materials. The possession of firearms, weapons, explosives, or non-work-related dangerous materials on work or while conducting work is strictly forbidden.

Drug, Alcohol, and Controlled Substance Requirements. The contractor shall have a written Drug and Alcohol Program that conforms to the Operator's Drug, Alcohol, and Controlled Substances Requirements, of which the contractor confirms receipt and understanding. The contractor shall comply with all governmental requirements, including all applicable federal, state, and local drug- and alcohol-related laws and regulations, including, without limitation, the applicable DOT regulations. The contractor shall have a drug and alcohol policy in place and a functioning drug and alcohol-testing program, which includes provisions for preemployment, postaccident, random, reasonable suspicion, return to duty, and follow-up testing as allowable under local, state, and federal law.

At a minimum, testing requirements and procedures, including testing mechanisms, substances, and cut-off levels, must comply with current DOT guidelines under 49 CFR Part 199 and/or 49 CFR Part 40. The contractor must have a non-DOT drug program. The contractor non-DOT Drug and Alcohol Program shall include preemployment/preaccess screening and drug testing, postincident testing, for-cause/reasonable suspicion testing, and random testing with an annual rate of at least 25% for drugs and 10% for alcohol. No alcoholic beverages are to be consumed on the work site. Any contractor determined to be under the influence of, in possession of, or distributing either drugs or alcohol will be discharged for the remainder of the work.

Smoking and Lighters/Matches. Smoking is not allowed in any facilities or vehicles owned by the operator or within at least 20 ft or more of any facility entrance or exit, windows, or air intake vents. Smoking is not allowed on any roof area. If permitted on the work site, lighters and matches should be stored in safe areas away from flammable or combustible materials. Electronic cigarettes are to be treated in the same manner and shall only be used in designated areas.

Inappropriate Behavior. Inappropriate behavior including, but not limited to, horseplay, practical jokes, offensive remarks, offensive gestures, harassment, etc., is prohibited while performing work or while on the work site. Contractors are expected to discharge any personnel engaged in fighting on the job site for the duration of the work. If any contractor is caught stealing from the operator or other contractors, those personnel are to be discharged and will be prohibited from returning to the work site.

4.5 Well Casing and Cementing Program

Minnkota plans to construct one CO₂ injection well (McCall-1 [proposed]) in the Deadwood Formation and one proposed monitoring well (NRDT-1) through the Deadwood Formation, as designed by OLCV in compliance with Class VI UIC injection well construction requirements. The target horizon for the injection well (McCall-1 [proposed]) is the Deadwood Formation, while the objective of the proposed monitoring well (NRDT-1) is to provide real-time pressure and temperature response from the Deadwood injection well (McCall-1) and Broom Creek injection wells (Liberty-1 (J-ROC1 file no. 37672) and Unity-1 [proposed]) based on actual injection operations.

The following information represents the proposed designs for the CO₂ injection well (McCall-1) (illustrated in Figure 4-12 and detailed in Tables 4-15–4-18) and monitoring well (NRDT-1) (illustrated in Figure 4-13 and detailed in Tables 4-19–4-22).

4.5.1 McCall-1 – Proposed Deadwood CO₂ Injection Well Casing and Cementing Programs

Tables 4-15 through 4-18 provide the casing and cement programs for the proposed Deadwood CO₂ injection well (McCall-1). The well construction materials will comply with NDAC § 43-05-01-11 (Injection Well Construction and Completion Standards).

Table 4-15. McCall-1 Proposed Deadwood CO₂ Injection Well Information

Well Name:	McCall-1	NDIC No.:	TBD	API No.:	TBD
County:	Oliver County	State:	ND	Operator:	Minnkota Power Cooperative, Inc.
Location:	Section 4, T141N R83W	Footages:	TBD	Total Depth:	10,000' MD

Table 4-16. McCall-1 Proposed Deadwood CO₂ Injection Well Casing Program

Section	Hole Size, in.	Casing OD, in.	Weight, lb/ft	Casing Seat	Casing Seat Measured Depth, ft	Grade, Connection*	Objective
Conductor	30	20	52.73	Surface formation	100	B, WELD-API 5L Specs	Prevent shallow groundwater and protect loose sediment near surface formations
Surface	17.50	13.375	54.5	Pierre	2,000	K-55, BTC	Cover shallow freshwater aquifers
Intermediate-1	12.25	9.625	47.0	Swift	4,200	L-80, premium	Cover shale formations
Intermediate-2	12.25	9.625	47.0	Mission Canyon State A	6,000	13CR-80, premium	Protect high-permeable formations with CO ₂ -resistant casing
Intermediate-1	12.25	9.625	47.0	Dawson Bay	7,800	L-80, premium	Cover shale formations
Production	8.50	7.00	29.0	Precambrian	10,000	13CR-C95, premium	Protect sandstone formations with CO ₂ -resistant casing

* BTC: buttress-thread and coupled, premium connection: gas-tight thread and coupled: vendor to be determined.

Table 4-17. McCall-1 Proposed Deadwood CO₂ Injection Well Casing Properties

Casing Description	Hole, in.	Depths, ft	ID, in.	Drift, in.	Burst, psi	Collapse, psi	Tension, Klb	OD Thread, in.
13.375" 54.5# K55 BTC	17.5	0–2,000	12.615	12.459	2,730	1,130	766	14.375
9.625" 47# L80 Premium Conn.	12.25	0–4,200	8.681	8.525	6,870	4,750	1,086	10.625
9.625" 47# L80 13Cr Premium Conn.	12.25	4,200–6,000	8.681	8.525	6,870	4,750	1,086	10.625
9.625" 47# L80 Premium Conn.	12.25	6,000–7,800	8.681	8.525	6,870	4,750	1,086	10.625
7" 29# C95 13Cr Premium Conn.	8.5	7,300–10,000	6.184	6.059	9,690	7,840	803	7.656

Table 4-18. McCall-1 Proposed Deadwood CO₂ Injection Well Cement Program

Section	Type	Depths (ft)	Density	Sx	Min. Excess	Cap	Vol	Yield
17.5" Hole	Class G cement with additives	0–1,500	12.5	822	50%	0.1237219	278	1.90
	Class G cement with additives	1,500–2,000	15.8	449	50%	0.1237219	93	1.16
12¼" Hole	Class G cement with additives	0–2,900	11.8–12.5	615	20%	0.0557819	194	1.77
	Class G cement with additives	2,900–3,400	14.8	164	20%	0.0557819	33	1.15
	DV tool @ 3,400 ft CO ₂ -resistant cement	3,400–7,800	14.8	134 3	20%	0.0557819	295	1.23
8½" Hole	CO ₂ -resistant cement	7,300–10,000	14.8	334	20%	0.022586	73	1.23

Note: Evaluate well condition to increase cement excess in case of losses. Centralization target 90%.

4.5.2 NRDT-1 – Proposed Deadwood CO₂-Monitoring Well Casing and Cementing Programs

The proposed design of the Deadwood CO₂-monitoring well (NRDT-1) is provided below in Figure 4-13.

Tables 4-19 through 4-22 provide the casing and cement programs for the proposed Deadwood CO₂-monitoring well (NRDT-1). The well construction materials will comply with NDAC § 43-05-01-11 (Injection Well Construction and Completion Standards).



NRDT-1
Monitor Well
Broom Creek / Deadwood

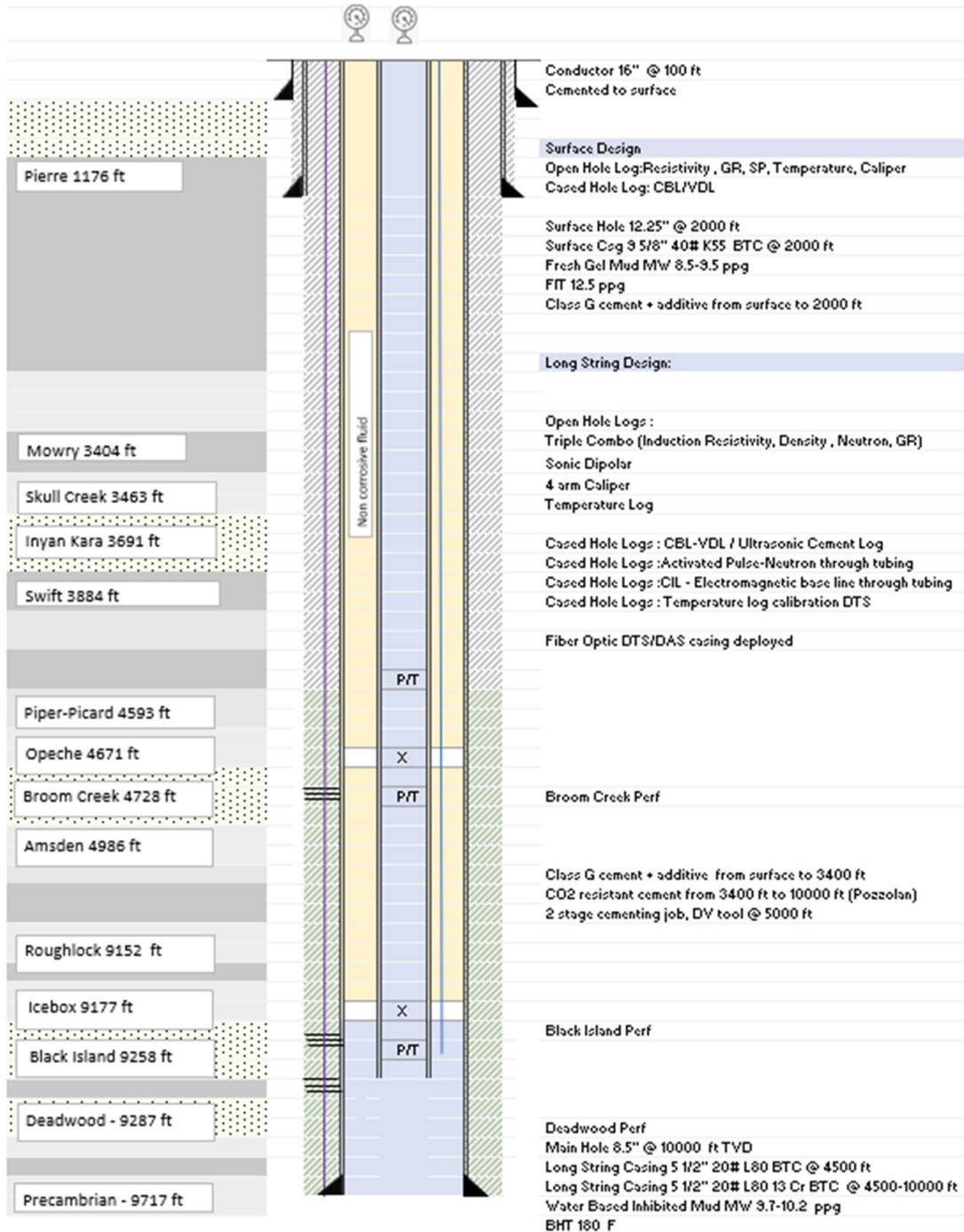


Figure 4-13. NRDT-1 proposed design of the Deadwood CO₂-monitoring wellbore schematic.

Table 4-19. NRDT-1 Proposed Deadwood CO₂-Monitoring Well Information

Well Name:	NRDT-1	NDIC No.:	-	API No.:	-
County:	Oliver County	State:	ND	Operator:	Minnkota Power Cooperative
Location:	-	Footages:	-	Total Depth:	10,000'

Table 4-20. NRDT-1 Proposed Deadwood CO₂-Monitoring Well Casing Program

Section	Hole Size, in.	Casing OD, in.	Weight, lb/ft	Grade	Connection	Top Depth, ft	Bottom Depth, ft	Objective
Surface	12¼	9⅝	40.0	K-55	BTC	0	2,000	Protect shallow freshwater aquifers
Long-String	8½	5½	20.0	L-80	BTC	0	4,500	Protect low-permeable formations
Long-String	8½	5½	20.0	13CR-80	BTC	4,500	10,000	Protect high-permeable formations

Table 4-21. NRDT-1 Proposed Deadwood CO₂-Monitoring Well Casing Properties

Casing Description	Hole in.	Casing Depths ft	Casing OD in.	Weight lb/ft	Grade	ID in.	Drift in.	Burst psi	Collapse psi	Tension Klb	Thread	OD Thread
9.625 in. 40 ppf K55 BTC	12.25	0–2,000	9.625	40	K55	8.835	8.679	3,950	2,570	630	BTC	10.625
5.5 in. 20 ppf L80 BTC	8.5	0–4,500	5.5	20	L80	4.778	4.653	9,190	8,830	466	BTC	6.05
5.5 in. 20 ppf L80 13Cr BTC	8.5	4,500–10,000	5.5	20	L80 13Cr	4.778	4.653	9,190	8,830	466	BTC	6.05

Table 4-22. NRDT-1 Proposed Deadwood CO₂-Monitoring Well Cement Program

Section	Hole Size, in.	Type	Depth, ft	Density, ppg	Sacks of Cement	Excess	Vol, bbl	Yield, ft ³ /sk	
Surface	12.25	Class G cement with additives	0–1,500	12.5	370	50%	126	1.90	
		Class G cement with additives	1,500–2,000	15.8	202	50%	42	1.16	
Long-String	8.5	Class G cement with additives	0–3,400	11.8–12	528	20%	166	1.77	
		CO ₂ -resistant cement	3,400–5,000	14.8	357	20%	78	1.23	
		DV tool @ 5,000 ft							
		Class G cement with additives	5,000–8,500	11.8–12	543	20%	171	1.77	
		CO ₂ -resistant cement	8,500–10,000	14.8	335	20%	73	1.23	

4.6 Well P&A Program

Upon end of life for the McCall-1 (proposed) CO₂ injection well or completion of the project, Minnkota plans to P&A the CO₂ injection well (McCall-1 [proposed]) in the Deadwood Formation and one proposed monitoring well (NRDT-1) through the Deadwood Formation, designed by OLCV according to NDAC 43-05-01-11.5. The plugging procedure and materials will be designed to prevent any unwanted fluid movement, resist the corrosive aspects of CO₂ with water mixtures, and protect any USDWs. Table 4-23 provides the cement program for plugging the proposed Deadwood CO₂ injection well, McCall-1. Figure 4-14 is the schematic.

The injection zone, the Black Island/Deadwood Formation, and overlying seal will be isolated from upper zones and USDWs with CO₂-resistant cement. An external mechanical integrity log will be performed before plugging. In addition, the well will be flushed with brine to force CO₂ into the formation.

4.6.1 McCall-1 Deadwood CO₂ Injection Well P&A

1. After injection has ceased, the well will be flushed with a kill fluid. A minimum of three tubing volumes will be injected without exceeding fracture pressure.
2. Bottomhole pressure measurements will be taken using the installed downhole gauges. In the case where the gauges are not functional, the operator will run pressure gauges during the P&A process of the well.
3. An active pulse neutron log will be run, and the well will be pressure-tested to ensure integrity both inside and outside of the casing prior to plugging. Production logging tools (PLTs), tracers, noise, or temperature logs could be run in substitution.
4. If a loss of mechanical integrity is discovered, the well will be repaired prior to proceeding further with the plugging operations.

5. All casing in this well will have been cemented to surface at the time of construction and will not be retrievable at abandonment.
6. After injection is terminated permanently, the injection tubing and packer will be removed.
7. Then the balanced-plug placement method will be used to plug the well. A cement retainer will be used to isolate the perforation section to avoid flowback of formation fluids that could contaminate the plug.

Contingency: If, after flushing, the tubing and packer cannot be released, an electric line with tubing cutter will be used to cut off the tubing above the packer and packer will be left in the well. The cement retainer method will be used for plugging the injection formation below the abandoned packer.

8. All casing strings will be cut off at least 5' below the surface and plow line.
9. A blanking plate with the required permit information will be welded on top of the cutoff casing.

Table 4-23. McCall-1 Proposed Deadwood CO₂ Injection Well Plug and Abandonment Cement Plug Program

Description/Plug No.	1	2	3	4	5	6
Placement Method	Squeeze	Balance plug mix and pump				
Slurry Density	15.8	15.8	15.8	15.8	15.8	15.8
Type of Slurry	-----CO ₂ -resistant-----				Class G + additive	
ID, in.	6.184	8.681	8.681	8.681	8.681	8.681
Slurry volume, bbl	50	24	56	48	42	5
Sacks of Cement by Plug	252	121	283	242	203	25
Plug Top, feet	9,100	7,000	4,500	3,300	1,700	0
Plug Bottom, feet	9,700	7,300	5,200	3,900	2,200	60

4.6.1.1 McCall-1 Injection Well-Plugging Schematic

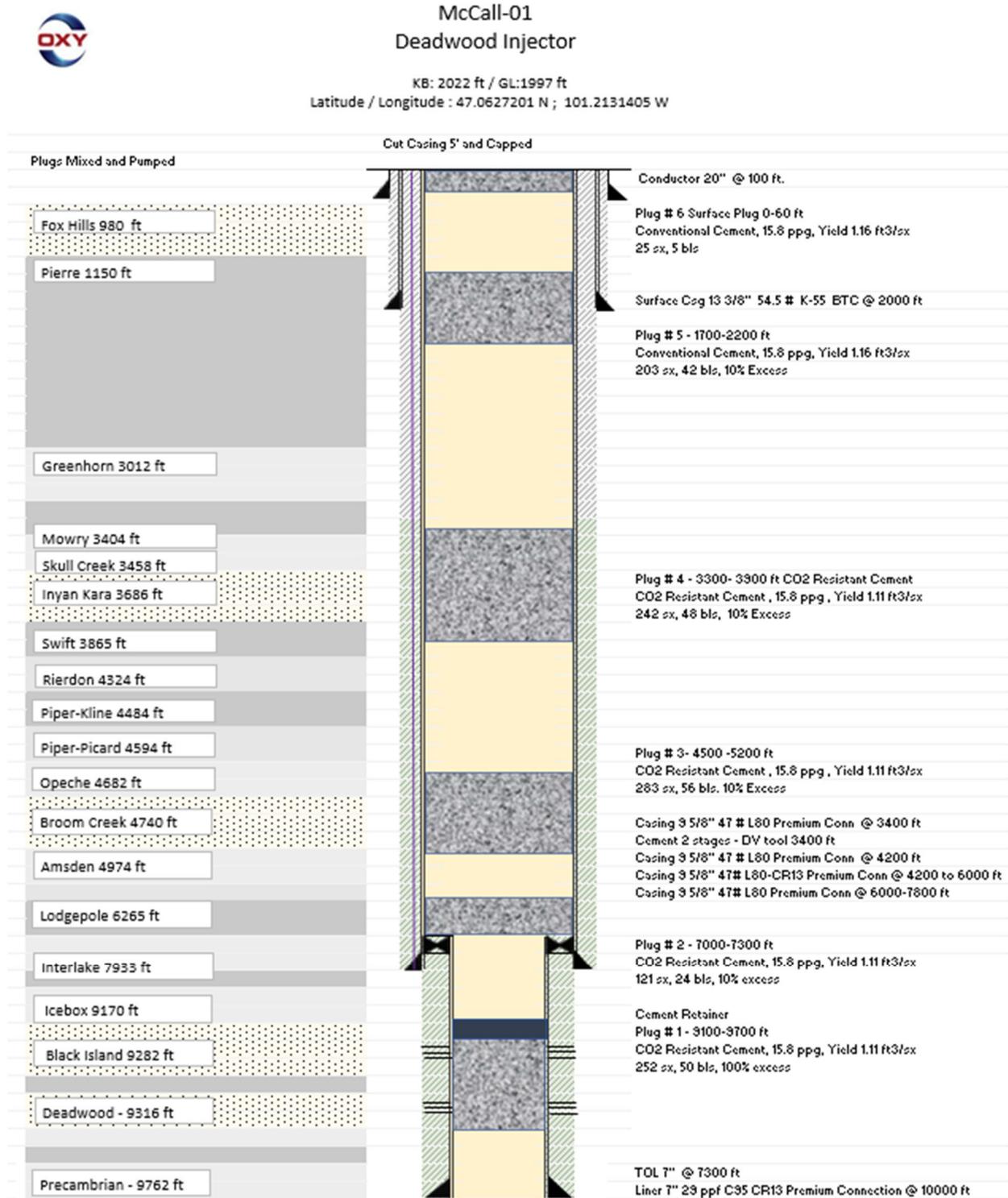


Figure 4-14. Proposed design of the Deadwood CO₂ injection well, McCall-1, P&A wellbore schematic.

4.6.1.2 Tentative Plugging Procedures

1. Move in (MI) rig onto McCall-1 well and rig up (RU). All CO₂ pipelines will be marked and noted with rig supervisor prior to MI.
2. Conduct and document a safety meeting.
3. Record bottomhole pressure from downhole gauge and calculate the kill fluid density.
4. Test the pump and line to 5,000 psi. Fill the tubing with kill fluid (determined by the bottomhole pressure measurement). Bleeding off occasionally may be necessary to remove all air from the system. Monitor tubing pressure.
5. Test casing annulus to 1,500 psi, or NDIC approved test pressure, and monitor it for 30 minutes. If the pressure decreases more than 10% in 30 minutes, bleed pressure, check surface lines and connections, and repeat test. Release pressure.

Note: If failure in long-string casing is identified, the operator will prepare a plan to repair the well prior to the P&A.

6. If both casing and tubing are dead, then nipple up blowout preventers (NU BOPs).

Contingency: If the well is not dead or pressure cannot be bled off tubing, RU slickline, and set plug in lower-profile nipple below the packer. Circulate tubing and annulus with kill weight fluid until the well is dead. After the well is dead, nipple down tree, NU BOPs, and perform a function test. Prepare to recover packer with work string.

7. Pull out of hole and lay down tubing, packer, cable, and sensors.

Contingency: If unable to release tubing and retrieve packer, RU electric line, and make a cut on the tubing string just above packer. Make a cut above the packer at least 5 to 10 ft MD. Then pull the work string out of the hole and proceed to the next step. If problems are noted, update cement remediation plan. The cement retainer might be used to force out cement in case the packer cannot be removed.

8. Pick up work string, and trip in hole (TIH) with bit to condition wellbore.
9. Pull out of the hole, and RU logging unit. Confirm external mechanical integrity by running one of the tests listed as options. Rig down logging truck.
 - a. Activate neutron log
 - b. Noise log
 - c. PLT
 - d. Tracers
 - e. Temperature log

10. TIH work string with cement retainer to the top of Plug 1. Circulate well, set retainer, and perform injectivity test. RU equipment for cementing operations.
11. Mix and pump CO₂-resistant slurry to cover the Black Island/Deadwood Formations and isolate them from the upper formations. Disconnect from retainer, and check flow. Circulate.
12. Move work string to 7,300 ft, set balanced plug with CO₂-resistant slurry 15.8 ppg to the top of the 7-in. liner.
13. Pull work string to 5,200 ft. Set balance plug with CO₂-resistant slurry 15.8 ppg to isolate Broom Creek Formation from the Dakota Group.
14. Pull out to 300 ft above the plug and circulate. Wait on cement. Run in the hole and tag cement to validate top.
15. Pull work string to 3,900 ft and circulate. Set balanced plug with CO₂-resistant slurry 15.8 ppg to cover the Dakota Group and isolate it from the USDW, Fox Hills. Pull 300 ft above the plug. Wait on cement. Run in the hole and tag plug.
16. Set balanced plug with Class G cement + additive 15.8 ppg to cover the shoe of the surface casing. Pull out above the plug and circulate.
17. Set surface plug with Class G cement + additive, 15.8 ppg to isolate the top of surface casing.
18. Lay down all the work string. Rig down all equipment and move out. Cut the casing at 5 ft below the ground. Clean cellar to where a plate can be welded with well information.
19. The procedures described above are subject to modification during execution as necessary to ensure a successful plugging operation. Any significant modifications due to unforeseen circumstances will be described in the plugging report.

4.6.2 NRDT-1 Deadwood Monitor Well P&A

Upon completion of the project, as part of the closure plan of the facilities, the well will be plugged and abandoned according to NDAC § 43-05-01-11.5. The plugging procedure and materials will be designed to prevent any unwanted fluid movement, resist the corrosive aspects of CO₂ with water mixtures, and protect any USDWs.

NRDT-1 is located at the border of the projected CO₂ plume, which will minimize the probability that the CO₂ mixed with formation fluids will cause damage to the cement or proposed tubulars. The plugs are designed to isolate the Black Island/Deadwood perforations from the Broom Creek section and overlying seal until the USDW. An external mechanical integrity log will be performed before plugging. In addition, the well will be flushed with brine to force any formation fluid back into the reservoir.

Table 4-24 provides the plugging cement program for the proposed NRDT-1 Deadwood CO₂-monitoring well. Figure 4-15 shows the proposed schematic.

Table 4-24. NRDT-1 Proposed Deadwood CO₂-Monitoring Well Plug and Abandonment Cement Plug Program

Description/Plug No.	1	2	3	4	5
Placement Method	Squeeze	Squeeze	Balanced Plug	Balanced Plug	Balanced Plug
Slurry Density	15.8	15.8	15.8	15.8	15.8
Type of Slurry	-----CO ₂ -resistant-----			Class G + additive	
ID, in.	4.653	4.653	4.653	4.653	4.653
Slurry Volume, bbl	19	13	14	12	4
Sacks of Cement by Plug	96	64	70	56	18
Plug Top, ft	9,100	4,600	3,300	1,700	0
Plug Bottom, ft	9,700	5,000	3,900	2,200	160

4.6.2.1 NRDT-1 Monitor Well-Plugging Schematic

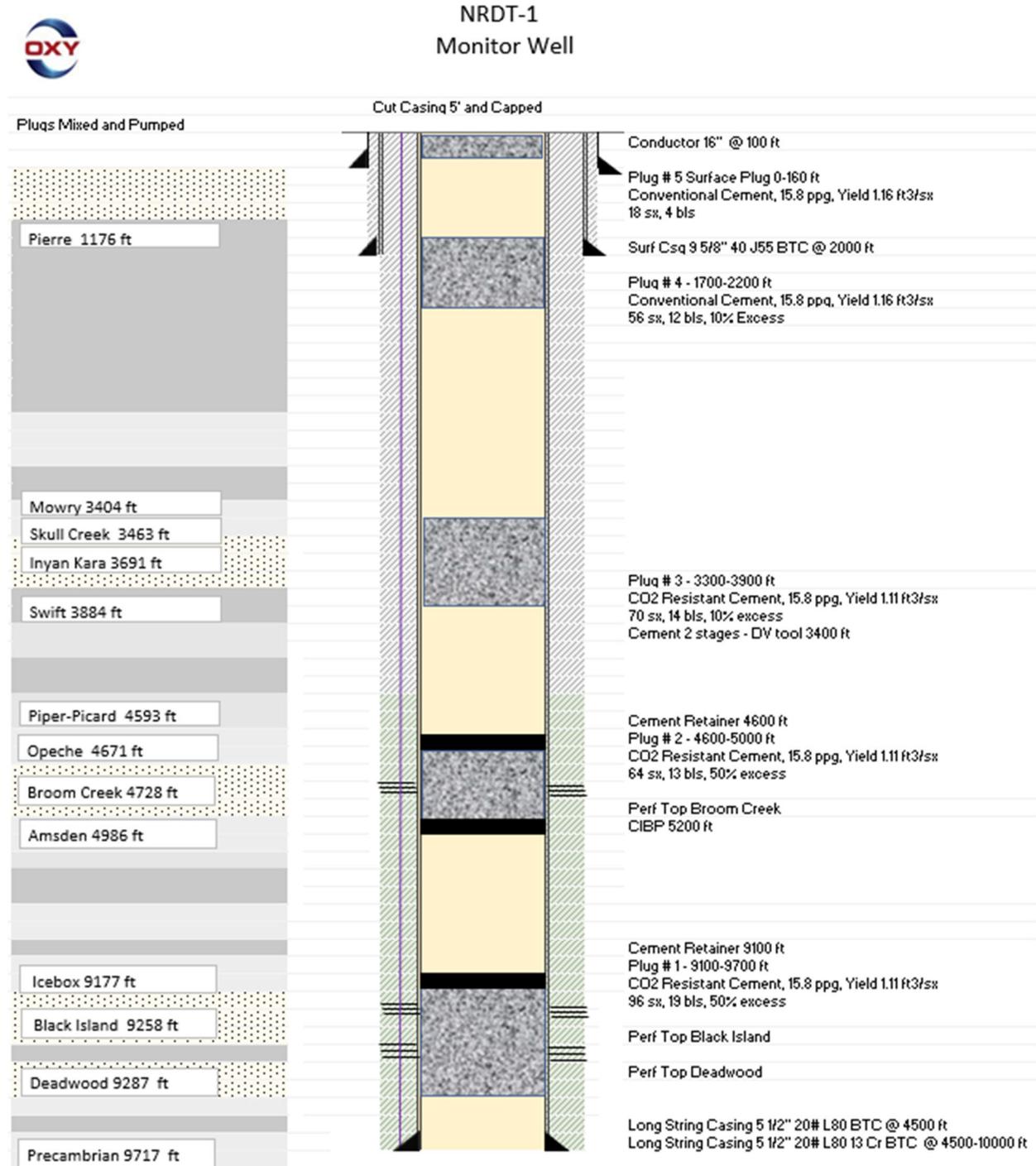


Figure 4-15. NRDT-1 proposed design of the CO₂ monitor well P&A wellbore schematic.

4.6.2.2 Tentative Plugging Procedures

1. Move-in (MI) rig onto NRDT-1 well and rig-up (RU).
2. Conduct and document a safety meeting.
3. Test the pump and line to 5,000 psi. Fill tubing with kill fluid. Bleeding off the system occasionally may be necessary to remove all the air. Monitor tubing pressure.
4. Test casing annulus to 1,500 psi, or approved NDIC pressure, and monitor it for 30 minutes. If the pressure decreases more than 10% in 30 minutes, bleed pressure, check surface lines and connections, and repeat test. Release pressure.

Note: If failure in the long string casing is identified, the operator will prepare a plan to repair the well prior to the plug and abandonment.

5. If both casing and tubing are dead, then NU BOPs.

Contingency: If the well is not dead or pressure cannot be bled off the tubing, RU slickline and set plug in the lower profile nipple below first packer. Circulate tubing and annulus with kill weight fluid until the well is dead. Then nipple down tree, NU BOPs, and perform a function test. Prepare to recover packer with work string.

6. Pull out of hole and lay down tubing, packer, cable, and sensors.

Contingency: If unable to release tubing and retrieve packers due to:

- a) **Top Packer Stuck:** Prepare plan to cut tubing above the top packer, 5 to 10 ft of MD. Mill/wash over the seals and OD of the top packer to release the string, until the bottom packer. Run fishing equipment and work fish out.
- b) **Bottom Packer Stuck:** If bottom packer is stuck, proceed to RU electric line and make cut on tubing string just above bottom packer pull the work string out of hole and proceed to next step. If problems are noted, update cement remediation plan.

7. Pick up work string, and TIH with bit to condition wellbore.
8. Pull out of the hole, and RU logging unit. Confirm external mechanical integrity by running one of the tests listed as options. Rig down logging truck.
 - a. Activate neutron log
 - b. Noise log
 - c. PLT
 - d. Tracers
 - e. Temperature log

9. TIH with work string and cement retainer to the top of Plug 1. Circulate well, set retainer, and perform injectivity test. RU equipment for cementing operations.
10. Mix and pump CO₂-resistant slurry to cover the Black Island/Deadwood Formations and isolate them from the upper formations. Disconnect from retainer and check flow. Circulate.
11. Pull work string out of the hole.
12. Run CIBP 50 ft below the perf in Broom Creek ~5,000 ft.
13. TIH work string with work string and cement retainer to the top of Plug 2. Circulate well, set retainer and perform injectivity test. RU equipment for cementing operations.
14. Mix and pump CO₂ resistant slurry 15.8 ppg to isolate the Broom Creek Formation From the Dakota Group. Disconnect from retainer and check flow. Circulate.
15. Pull work string to 3,900 ft. Circulate. Set balanced plug, CO₂ resistant slurry 15.8 ppg to cover Dakota Group and isolate it from USDW Fox Hills. Pull 300 ft above the plug. Wait on cement. Run in the hole and tag plug.
16. Set balanced plug with Class G cement + additive 15.8 ppg to cover the shoe of the surface casing. Pull out above the plug and circulate.
17. Set surface plug with Class G cement + additive, 15.8 ppg to isolate the top of surface casing.
18. Lay down all work string. Rig down all equipment and move out. Cut the casing at 5 ft below surface. Clean cellar to where a plate can be welded with well information.
19. The procedures described above are subject to modification during execution as necessary to ensure a successful plugging operation. Any significant modifications due to unforeseen circumstances will be described in the plugging report.

4.7 Postinjection Site and Facility Closure Plan

The PISC and facility closure plan describes the activities that Minnkota will perform following the cessation of CO₂ injection to achieve final closure of the site. A primary component of this plan is a postinjection monitoring program that will provide evidence that the injected CO₂ plume is stable; i.e., CO₂ migration will be unlikely to move beyond the boundary of the storage facility area. The monitoring locations, methods, and schedule are designed to show the position of the CO₂ plume and demonstrate that the CO₂ injected is within the storage reservoir and there is no endangerment to USDWs.

Based on the current simulations of the CO₂ plume movement following the cessation of CO₂ injection, it is projected that the CO₂ plume will stabilize within the storage facility area boundary (see Appendix A), ensuring the safety of USDWs within the AOR. Based on these observations, a minimum postinjection monitoring period of 10 years is planned to confirm these current predictions of the CO₂ plume extent and postinjection stabilization. However, monitoring

will be extended beyond 10 years if it is determined that additional data are required to demonstrate a stable CO₂ plume and safety of USDWs. The nature and duration of that extension will be determined based upon an update of this plan and NDIC approval.

In addition to executing the postinjection monitoring program, the Class VI injection and monitoring wells will be plugged, as described in the plugging plan of this permit application (Section 4.6). All surface equipment not associated with long-term monitoring will be removed, and the surface land of the site will be reclaimed to as close as practical to its original condition. Lastly, following the plume stability demonstration, a final assessment will be prepared to document the status of the site and submitted as part of a site closure report.

4.7.1 Predicted Postinjection Subsurface Conditions

4.7.1.1 Pre- and Postinjection Pressure Differential

Model simulations were performed to estimate the change in pressure in the Deadwood Formation during and after the cessation of CO₂ injection. The simulations were conducted for 20 years of CO₂ injection at a rate of 1.17 MMt per year, followed by a postinjection period of 10 years.

Figure 4-16 shows the predicted pressure differential at the conclusion of 20 years of CO₂ injection. As shown, at the time that CO₂ injection operations have stopped, the model predicts an increase in the pressure of the reservoir, with a maximum pressure differential of 0 to 164.33 psi at the location of the injection well. It is important to note that this maximum pressure increase is not sufficient to move formation fluids from the storage reservoir to the deepest USDW. The details of this pressure evaluation are provided as part of the AOR delineation of this permit application (see Appendix A).

A description of the predicted decrease in this pressure profile of the Deadwood Formation over the 10-year postinjection period is provided in Figure 4-17. As expected, the pressure in the reservoir gradually decreases over time following the cessation of CO₂ injection, with the pressure at the injection well after 10 years of postinjection predicted to decrease 414.3 to 1,318.18 psi compared to the pressure at the time CO₂ injection was terminated. This trend of decreasing pressure in the storage reservoir is anticipated to continue over time until the pressure of the storage reservoir approaches the original storage reservoir pressure conditions prior to any CO₂ injection activities.

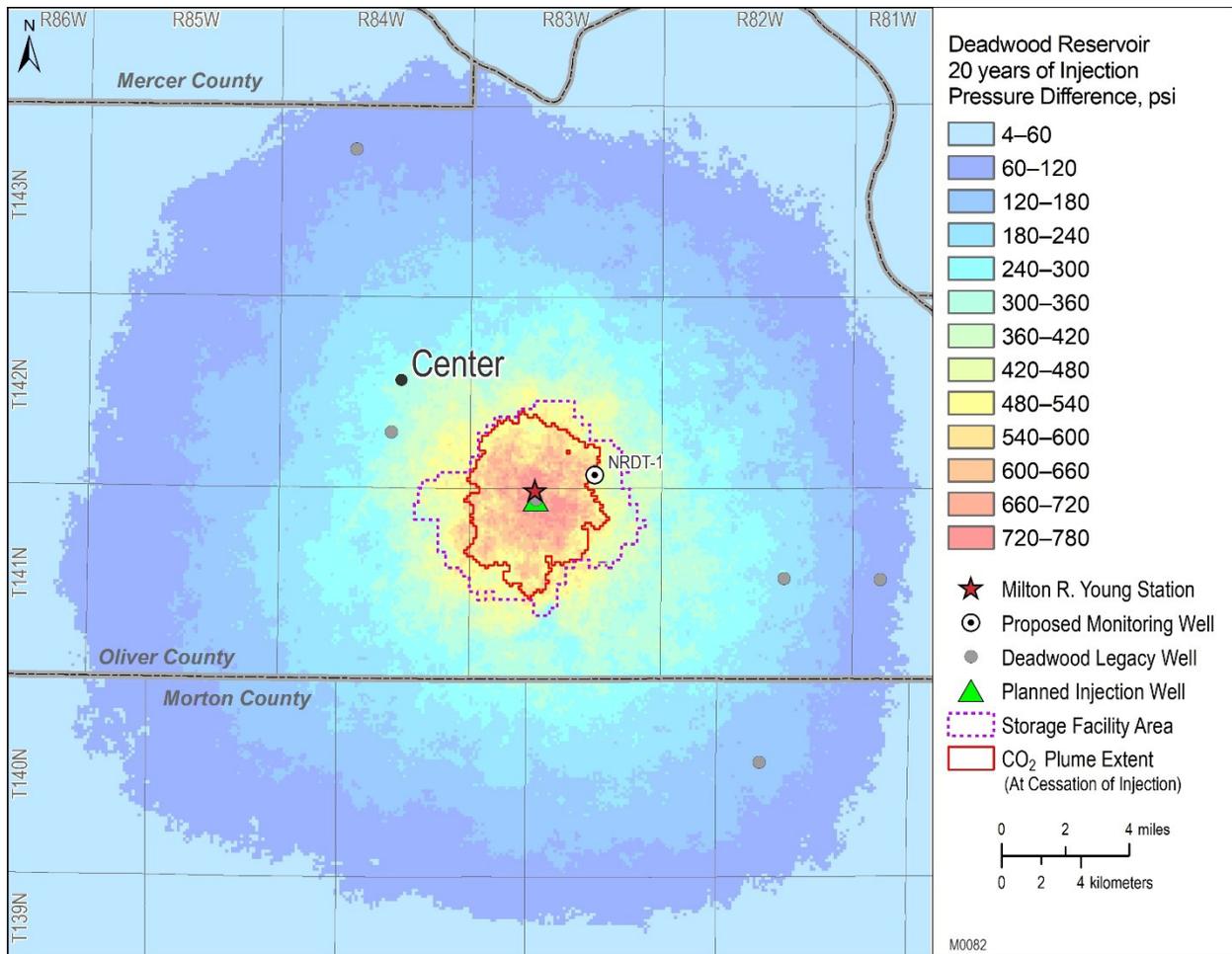


Figure 4-16. Predicted pressure increase in storage reservoir following 20 years of injection of 1.17 MMt per year of CO₂.

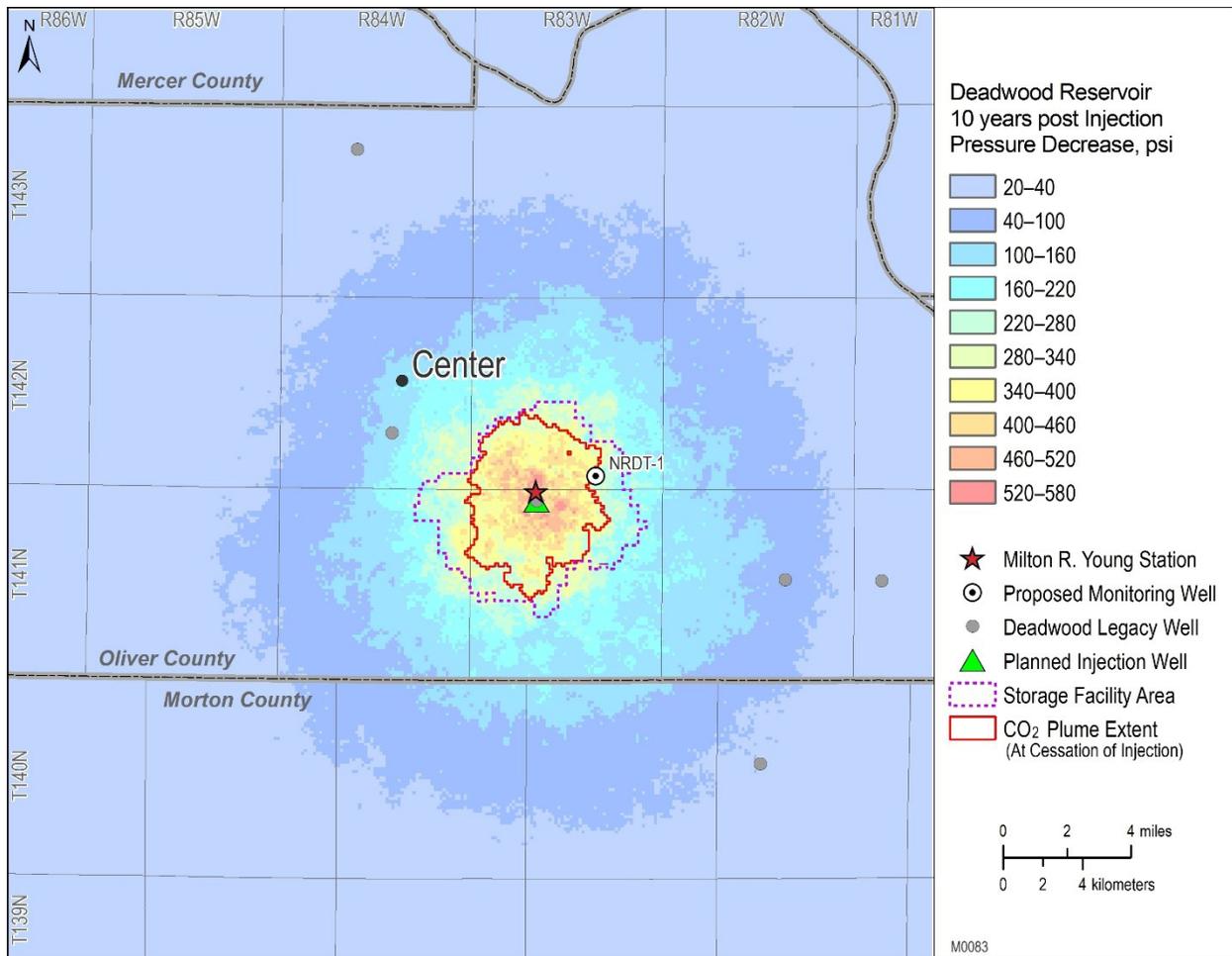


Figure 4-17. Predicted decrease in pressure in the storage reservoir over a 10-year period following the cessation of CO₂ injection.

4.7.1.2 Predicted Extent of CO₂ Plume

Also shown in Figures 4-16 and 4-17 are numerical simulation predictions of the extent of the CO₂ plume at the time CO₂ injection was terminated (i.e., after 20 years of injection) and following the planned 10-year PISC period, respectively. The results of these simulations predict that 99.0% of the separate-phase CO₂ mass would be contained within an area of 20 mi² at the end of CO₂ injection (see Figure 4-16). As shown in Figure 4-17, the areal extent of the CO₂ plume is not predicted to change substantially over the planned 10-year PISC period.

Additional simulations beyond the 10-year PISC period were also performed and predict that at no time will the boundary of the stabilized plume at the site, which is shown on both Figures 4-16 and 4-17, extend beyond the boundary of the storage facility area. If such a determination can be made following the planned 10-year postinjection period, the CO₂ plume will meet the definition of stabilization as presented in NDCC § 38-22-17(5d) and qualify the geologic storage site for receipt of a certificate of project completion.

4.7.1.3 Postinjection Monitoring Plan

A summary of the postinjection monitoring plan that will be implemented during the 10-year postinjection period is provided in Table 4-25. The plan includes a combination of soil gas and groundwater/USDW monitoring, storage reservoir pressure/temperature and CO₂ saturation monitoring, well integrity testing, and geophysical monitoring of the CO₂ plume in the storage reservoir. Each of these monitoring efforts is described in more detail in Table 4-25.

Table 4-25. Summary of 10-year Postinjection Site Care-Monitoring Program

Type of Monitoring	Frequency	Comments
Near-Surface Monitoring		
Soil Monitoring		
Soil Gas Profile Stations (Soil Gas Location – see Figure 4-18)	Duration: minimum 10 years. Frequency: 3–4 seasonal sample events at soil gas profile stations performed every 3 years following cessation of CO ₂ injection.	Located at the McCall-1 and NRDT-1 wells. See Figure 4-18.
Water Monitoring		
Groundwater Wells	Duration: minimum 10 years. Frequency: 3–4 sample events per year at the cessation of injection and 3–4 sample events as part of the final site closure assessment.	Sampling will be performed on all active and accessible freshwater groundwater wells within the AOR (see Figure 4-18).
Fox Hills Formation	Duration: minimum 10 years. Frequency: 3–4 sample events at cessation of injection and 3–4 sample events as part of the final site closure assessment.	Deepest USDW.
Storage Reservoir Monitoring		
Injection Well (McCall-1)	Monitor fluid levels until well is plugged.	Minnkota plans to P&A injection well (McCall-1) at cessation of injection operations.
Downhole Pressure and Temperature Monitoring (NRDT-1)		
Distributed Fiber Optic Temperature (DTS)	Continuous.	DTS fiber will give continuous temperature profile for monitoring well NRDT-1 from the base of fiber to the surface until plume stabilization.
Pressure and Temperature Gauges in NRDT-1	Bimonthly.	Gauges provide continuous temperature and pressure monitoring of the injection zone (Deadwood) until plume stabilization. Monitoring will continue as part of the PISC and facility closure plan.
Wireline Logging and Retrievable Monitoring (NRDT-1)		
PNL (McCall-1 and NRDT-1)	NRDT-1 at cessation of injection and once every 5 years thereafter until plume stabilization is demonstrated.	Log McCall-1 and NRDT-1 wells at cessation of injection.

Continued . . .

Table 4-25. Summary of 10-year Postinjection Site Care Monitoring Program (continued)

Type of Monitoring	Frequency	Comments
Well Integrity Test		
External Mechanical Integrity: USIT or Electromagnetic Casing Inspection Tool	Duration: minimum 10 years postinjection. Frequency: Perform during well workovers but not more frequently than once every 5 years in NRDT-1.	Annually until the injection well is P&A.
External Mechanical Integrity: Downhole Temperature	Annual temperature logging in NRDT-1 (if fiber fails) until plume stabilization.	
DTS	Continuous.	Continuous DTS monitoring in NRDT-1 until P&A. DTS fiber provides continuous temperature profile from the base of fiber to the surface until plume stabilization.
Pressure Fall-Off Test (Injection Zone)	Prior to P&A.	
Geophysical Monitoring		
Time-Lapse Seismic	Perform 2D and/or 3D seismic surveys at the cessation of CO ₂ injection and every 5 years during the postinjection period.	Time-lapse seismic surveys will continue as part of the 10-year postinjection period to support a stabilization assessment of the CO ₂ plume.
InSAR	To be determined.	To be determined – continuous monitoring of ground elevation based on relative storage deformation with InSAR until storage facility achieves stabilization.

4.7.2 Groundwater and Soil Gas Monitoring

Two soil gas profile stations, two Fox Hills Formation (i.e., deepest USDW) monitoring wells, and various groundwater wells, that were identified and sampled during the operations phase of the project, will be sampled during the proposed 10-year PISC period. Figure 4-18 identifies the location of the soil gas profile stations, Fox Hills Formation monitoring wells, and groundwater monitoring wells that will be included in this monitoring effort. It is proposed that these samples will be analyzed for the same list of parameters as described in the testing and monitoring plan (Section 4.4 of this permit application); however, it is anticipated that the final target list of analytical parameters will likely be reduced for the PISC period based upon an evaluation of the monitoring results that are generated during the 20-year injection period of the storage operations.

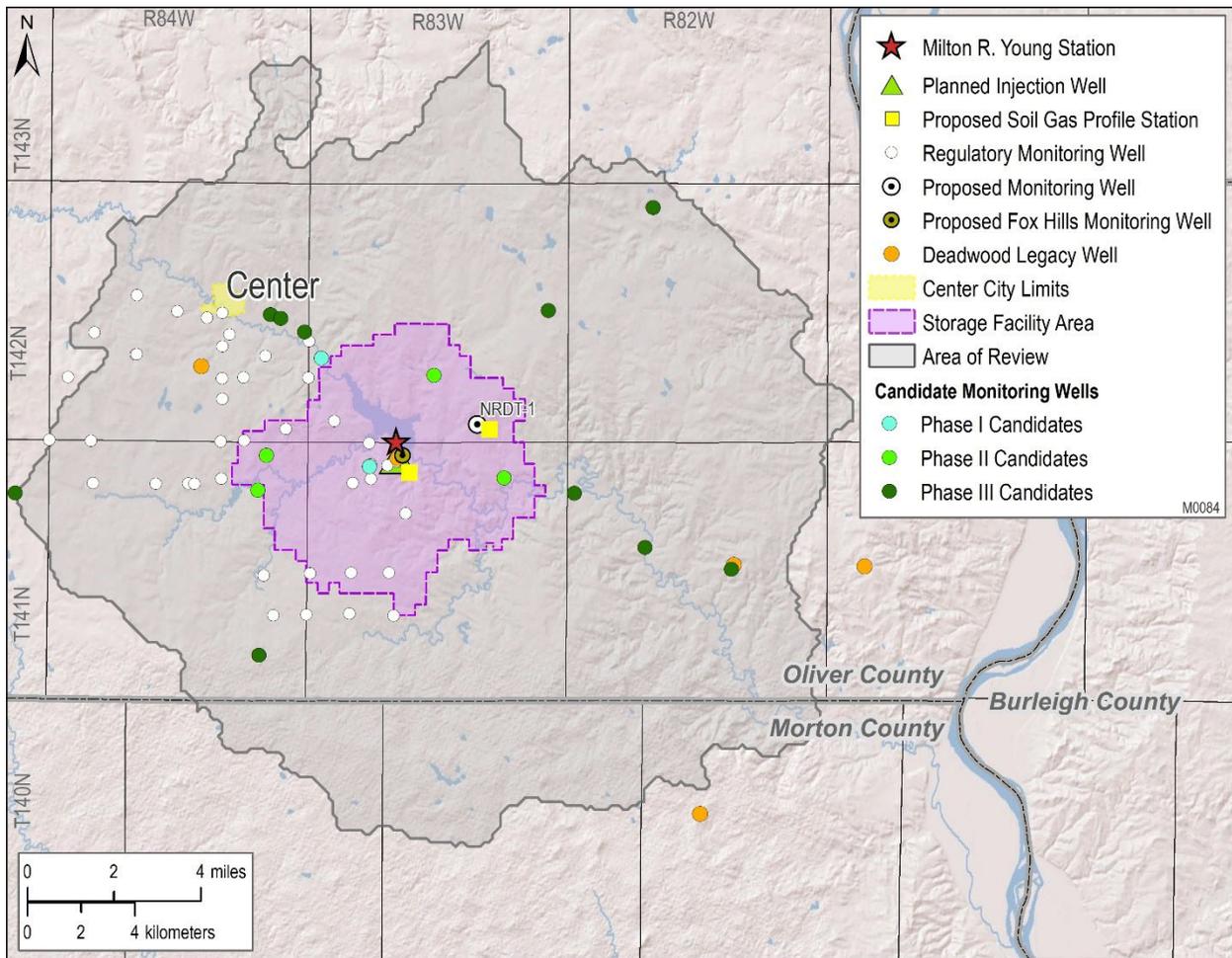


Figure 4-18. Location of soil gas and groundwater well sampling locations included in the PISC monitoring program.

4.7.3 Monitoring of CO₂ Plume and Pressure Front

Monitoring of the CO₂ plume location and storage reservoir pressure will be conducted during the PISC period using the methods summarized in Table 4-25, which are also discussed in more detail in the testing and monitoring plan of this permit application (Section 4.4). Monitoring methods include a combination of formation-monitoring methods (e.g., downhole pressure, temperature, mechanical integrity tests, PNLs, and capture/reservoir saturation tool logs) and geophysical monitoring techniques (i.e., surface 3D seismic monitor [4D seismic]) that monitor CO₂ saturation. Figure 4-19 provides an aerial view of the extents of both the existing 3D seismic surveys and potential borehole seismic (or VSP) surveys as compared to the predicted areal extents of the CO₂ plume at the cessation of injection and stabilized plume.

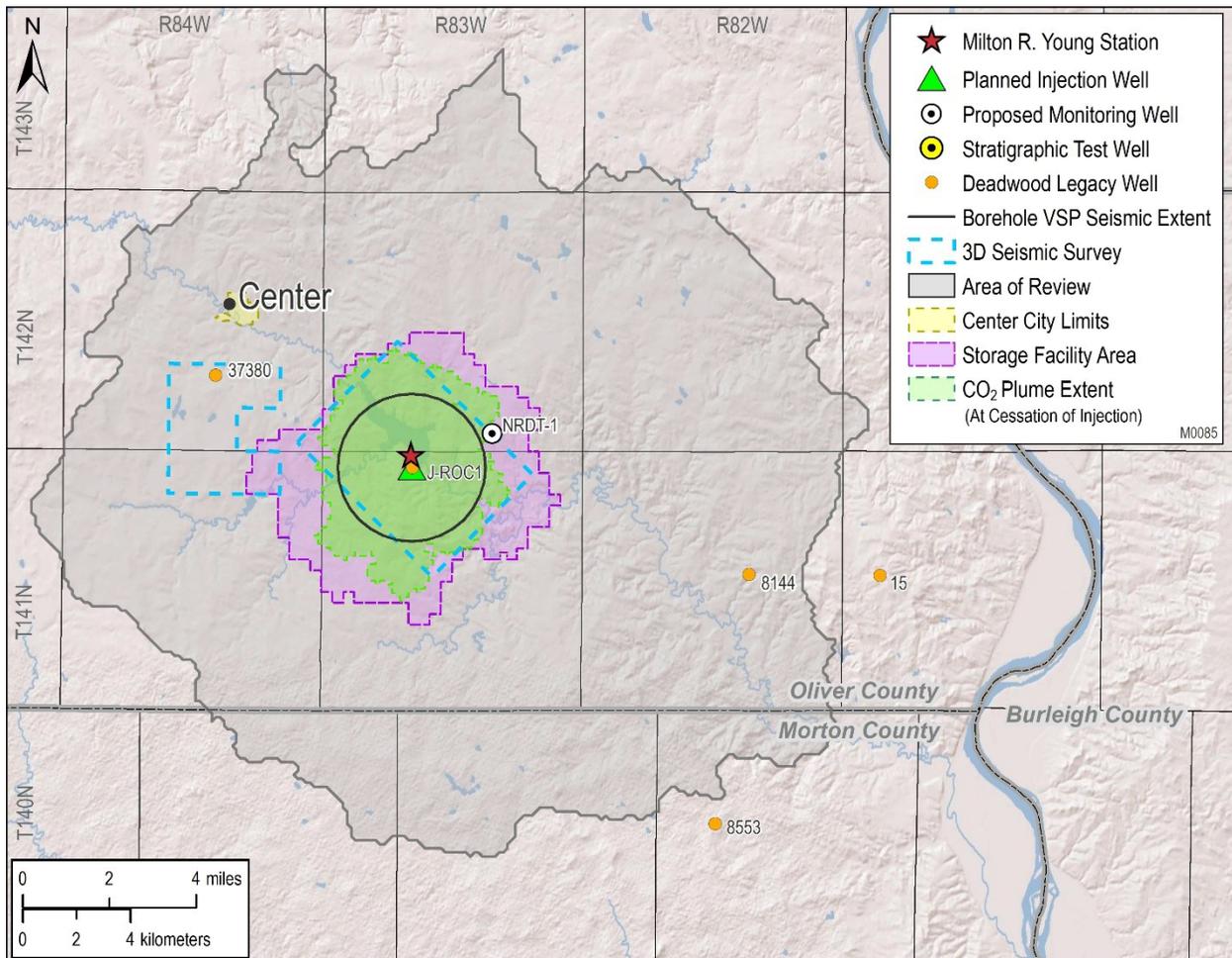


Figure 4-19. Areal extents of the 3D and borehole seismic surveys proposed during the PISC period in comparison to the areal extent of the CO₂ plume at cessation of injection.

4.7.3.1 Schedule for Submitting Postinjection Monitoring Results

All postinjection site care-monitoring data and monitoring results will be submitted to NDIC in annual reports. These reports will be submitted each year, within 60 days following the anniversary date on which the CO₂ injection ceased. Water sample analytical results will also be submitted to the ND State Water Commission.

The annual reports will contain information and data generated during the reporting period, including seismic data acquisition, formation-monitoring data, soil gas and groundwater sample analytical results, and simulation results from updated site models and numerical simulations.

4.7.3.2 Site Closure Plan

Minnkota will submit a final site closure plan and notify NDIC at least 90 days prior of its intent to close the site. The site closure plan will describe a set of closure activities that will be performed, following approval by NDIC, at the end of the PISC period. Site closure activities will include the plugging of all wells that are not targeted for use as future subsurface observation wells; decommissioning of storage facility equipment, appurtenances, and structures (e.g., structures/buildings, gravel pads, access roads, etc.) not associated with monitoring; and reclaiming of the surface land of the site to as close as is practical to its original condition.

4.7.3.3 Submission of Site Closure Report, Survey, and Deed

A site closure report will be prepared and submitted to NDIC within 90 days following the execution of the PISC and facility closure plan. This report will provide NDIC with a final assessment that documents the location of the stored CO₂ in the reservoir, describes its characteristics, and demonstrates the stability of the CO₂ plume in the reservoir over time. The site closure report will also document the following:

- Plugging of the verification and geophysical wells (and injection well if it has not previously been plugged).
- Location of sealed injection well on a plat survey that has been submitted to the local zoning authority.
- Notifications to state and local authorities as required by NDAC § 43-05-01-19.
- Records regarding the nature, composition, and volume of the injected CO₂.
- Postinjection monitoring records.

At the same time, Minnkota will also provide NDIC with a copy of an accurate plat certified by a registered surveyor that has been submitted to the county recorder's office designated by NDIC. The plat will indicate the location of the injection well relative to permanently surveyed benchmarks pursuant to NDAC § 43-05-01-19.

Lastly, Minnkota will record a notation on the deed (or any other title search document) to the property on which the injection well was located pursuant to NDAC § 43-05-01-19.

4.8 References

- ASTM International, 2017, ASTM G1-03(2017)e1, Standard practice for preparing, cleaning, and evaluating corrosion specimens: West Conshohocken, Pennsylvania, ASTM International, www.astm.org (accessed December 2020).
- Reed, S., Ge, J., Burnison, S.A., Bosshart, N.W., Hamling, J.A., and Gorecki, C.D., 2018, Viability of InSAR as a monitoring tool in challenging terrain: Bell Creek, Montana: Paper presented at the 14th International Conference on Greenhouse Gas Control Technologies (GHGT-14), Melbourne, Australia, October 21–25, 2018.
- Vasco, D.W., Dixon, T.H., Ferretti, A., and Samsonov, S.V., 2020, Monitoring the fate of injected CO₂ using geodetic techniques: *The Leading Edge*, v. 39, no. 1, p. 29–37.

5.0 INJECTION WELL AND STORAGE OPERATIONS

This section of the storage facility permit (SFP) application presents the engineering criteria for completing and operating the injection well in a manner that protects underground sources of drinking water (USDWs). The information that is presented meets the permit requirements for injection well and storage operations as presented in North Dakota Administrative Code (NDAC) § 43-05-01-05 (SFP, Table 5-1) and NDAC § 43-05-01-11.3

Table 5-1. McCall-1 Proposed Deadwood Injection Well Operating Parameters

Predicted Metric	McCall-1	Description/Comments
Injection Volume		
Total Injected Volume, MMT	23.4	Based on 20 years of injection.
Injection Rate		
Predicted Average Injection Rate, tonnes per day	3,250	Based on total injected volumes for 20 years and using 365 operating days a year.
Maximum Predicted Daily Injection Rate, tonnes per day	3,865	Based on 20 years of injection.
Pressure		
Formation Fracture Pressure at Top Perforation, psi	6,866	The injectivity test results fracture closure gradient of 0.75 psi/ft.
Average Predicted Operating Surface Injection Pressure, psi	2,794	Based on 20 years of injection.
Maximum Wellhead Injection Pressure, psi	3,445	Maximum wellhead injection pressure is limited based on surface facility constraints and 90% of formation fracture pressure.
Average Predicted Operating Bottomhole Pressure (BHP), psi	6,139	Based on 20 years of injection.
Maximum BHP psi	6,179	Calculated maximum BHP using 90% of the closure pressure from the injectivity test at the top of the perforation. Maximum BHP is limited based on surface facility constraints.

5.1 Proposed Completion Procedure to Conduct Injection Operations in the Deadwood Injection Well

Minnkota Power Cooperative (Minnkota) plans to construct one carbon dioxide (CO₂) injection well (McCall-1) designed by Oxy Low Carbon Ventures in compliance with Class VI UIC (underground injection control) injection well construction requirements, as discussed in previous sections and drilled according to the proposed program in the permit to drill. The following proposed completion procedure outlines the steps necessary to complete a Deadwood well for injection purposes (Figure 5-1, Table 5-2).

McCall-1 (Deadwood Injector)

KB: 2022 ft / GL:1997 ft
Latitude / Longitude : 47.0627201 N ; 101.2131405 W

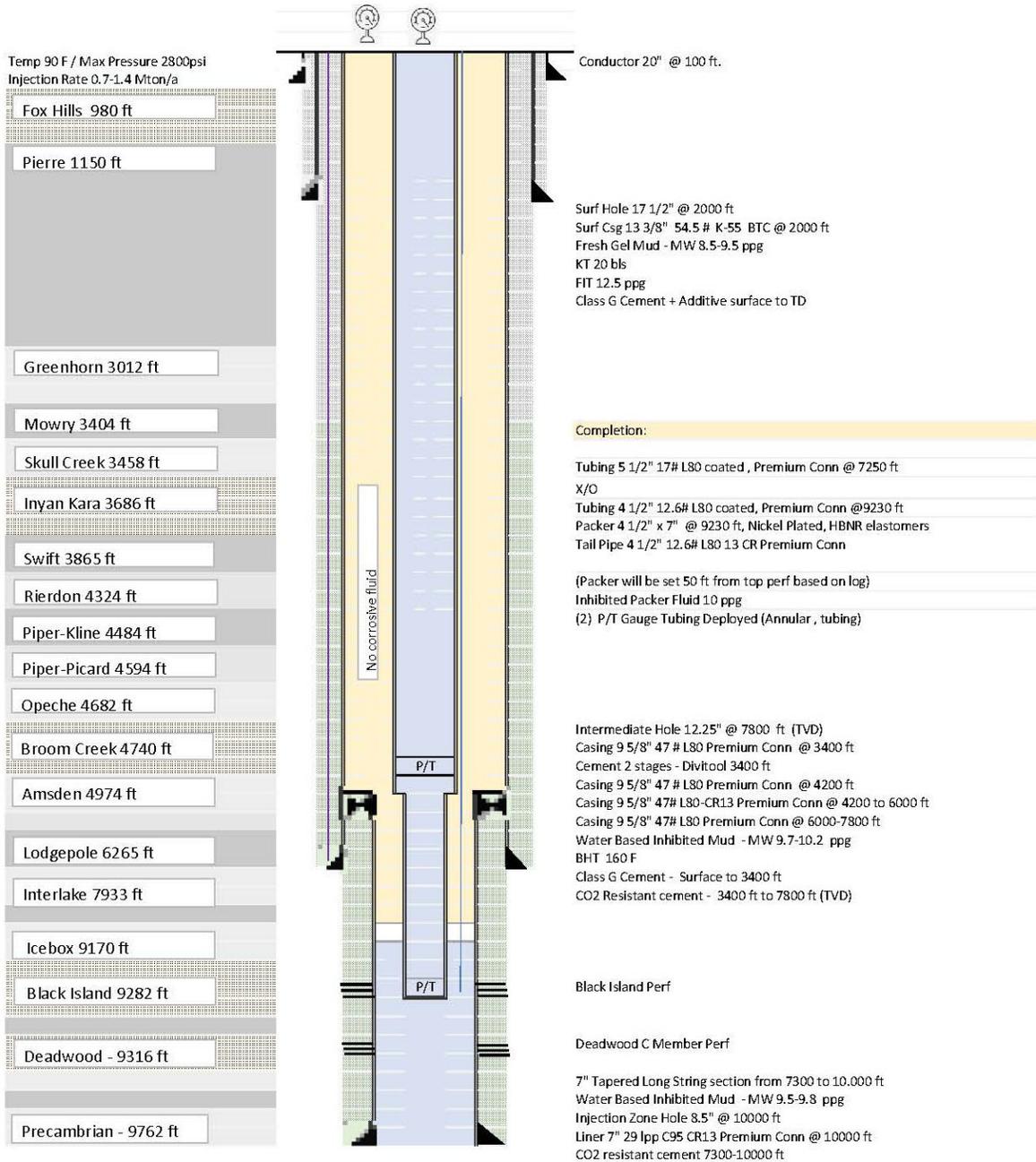


Figure 5-1. McCall-1_Deadwood injection well proposed completion wellbore schematic.

Table 5-2. McCall-1 Deadwood Injection Well Proposed Casing Properties

Casing Description ID	Hole, in.	Depths, ft	ID, in.	Drift, in.	Burst, psi	Collapse, psi	Tension, Klb	OD Thread, in.
13.375" 54.5# K55 BTC	17.5	0–2,000	12.615	12.459	2,730	1,130	766	14.375
9.625" 47# L80 Premium Conn	12.25	0–4,200	8.681	8.525	6,870	4,750	1,086	10.625
9.625" 47# L80 13Cr Premium Conn	12.25	4,200–6,000	8.681	8.525	6,870	4,750	1,086	10.625
9.625" 47# L80 Premium Conn	12.25	6,000–7,800	8.681	8.525	6,870	4,750	1,086	10.625
7" 29# C95 13Cr Premium Conn	8.5	7,300–10,000	6.184	6.059	9,690	7,840	803	7.656

5.2 Proposed Completion Procedure for McCall-1_Deadwood CO₂ Injectate Well

1. Pick up work string with 8½" bit to clean cement on top of the tapered long string. Clean cement, circulate, and pull out of the hole.
2. Pick up work string with 6¾" and rotating scrapper to clean cement inside of the tapered long string. Clean cement to the top of the landing collar.
3. Circulate with brine 10 ppg.
4. Test casing for 30 minutes with 1,500 psi. If the pressure decreases more than 10% in 30 minutes, bleed pressure, check surface lines and surface connections, and repeat test. If the failure persists, the Operator may require assessing the root cause and correcting it.
5. Pull bottomhole assembly (BHA) out of the hole.
6. Perform safety meeting to discuss logging and perforating operations.
7. Rig up logging truck.
8. Run cased hole logs by program. **Note:** run CBL/VDL (cement bond log/carriable-density log) and USIT (ultrasonic imaging tool) without pressure as a first pass and run it with 1,000 psi pressure as a second pass, if needed.

Note: In case the cementing logs show poor bonding in the cementing job, the results will be communicated to the North Dakota Industrial Commission (NDIC), and an action plan will be prepared.

9. Run perforating guns to the injection target.
10. Perforate the Black Island and Deadwood Formation, minimum 4 spf (shots per foot). Depth will be defined with the final log. Gas gun technology or high-performance guns should be evaluated to provide deeper penetration into the formation.
11. Pull guns out of the hole.
12. Rig down logging truck.
13. Pick up straddle packer and run in the hole with working string.
14. Circulate with brine 10 ppg.
15. Set packer in the Deadwood Formation to isolate the perforations.
16. Rig up acid trucks and equipment.
17. Perform cleaning of the perforations with acid (design volumes and pressures will be evaluated based on the well conditions once drilled). Adjust acid formulation and volumes with water samples and compatibility test.
18. Rig down acid trucks and equipment.

19. Perform an injectivity test/step rate test.
20. Unset packer and circulate hole.
21. Set packer in the Black Island Formation to isolate the perforations.
22. Rig up acid trucks and equipment.
23. Perform cleaning of the perforations with acid (design volumes and pressures will be evaluated based on the well conditions once drilled). Adjust acid formulation and volumes with water samples and compatibility test.
24. Rig down acid trucks and equipment.
25. Perform an injectivity test/step rate test.
26. Unset packer and circulate hole.
27. Pull packer and work string out of the hole.
28. Rig up spooler and prepare rig floor to run upper completion.
29. Run completion assembly per program.
30. Circulate well with inhibited packer fluid.
31. Set packer 50 ft above the top perforations.
32. Install tubing sections, cable connector, and tubing hanger.
33. Rig up logging truck.
34. Run cased hole logs through tubing by program.
35. Rig down logging truck.
36. Nipple down BOP (blowout preventer).
37. Install injection tree.
Note: Figure 5-2 illustrates the proposed wellhead schematic
38. Rig down equipment.

Note: DTS/DAS (distributed temperature sensing/distributed acoustic sensing) fiber optic will be run and attached to the exterior of the intermediate casing. Special clamps, bands, and centralizers will be installed to protect the fiber and provide a marker for wireline operations.

Note: Tapered long string hanger should include top packer seal.

The McCall-1_Deadwood CO₂ Injection Well Proposed Tubing Design is detailed in the following section (Table 5-3).

Table 5-3. McCall-1_Deadwood CO₂ Injection Well Proposed Tubing Design

Description	Type, in.	Depths, ft	ID, in.	Burst, psi	Collapse, psi	Tension, Klb	OD Thread, in.
5.5" 20# L80 Coated Premium Conn	Tubing	0–7,250	4.778	9,190	8,830	466	6.05
4.5" 12.6# L80 Coated Premium Conn	Tubing	7,250–9,230	3.958	8,430	7,500	288	5.2
Packer 4.5" × 7"	50 ft above Perf.		Nickel-Plated, HNBR*				
4.5" 12.6# L80 13Cr Premium Conn	Tubing	9,230–9,400	3.958	8,430	7,500	288	5.2

* Hydrogenated nitrile butadiene rubber.

1. Packer depth will be adjusted with the final perforation depth interval.
2. Packer will be set 50 ft above top perforations.
3. Packer is required to be nickel-plated with HNBR elastomers.

4. Inconel cable along with quartz pressure and temperature gauges will be run in upper completion.

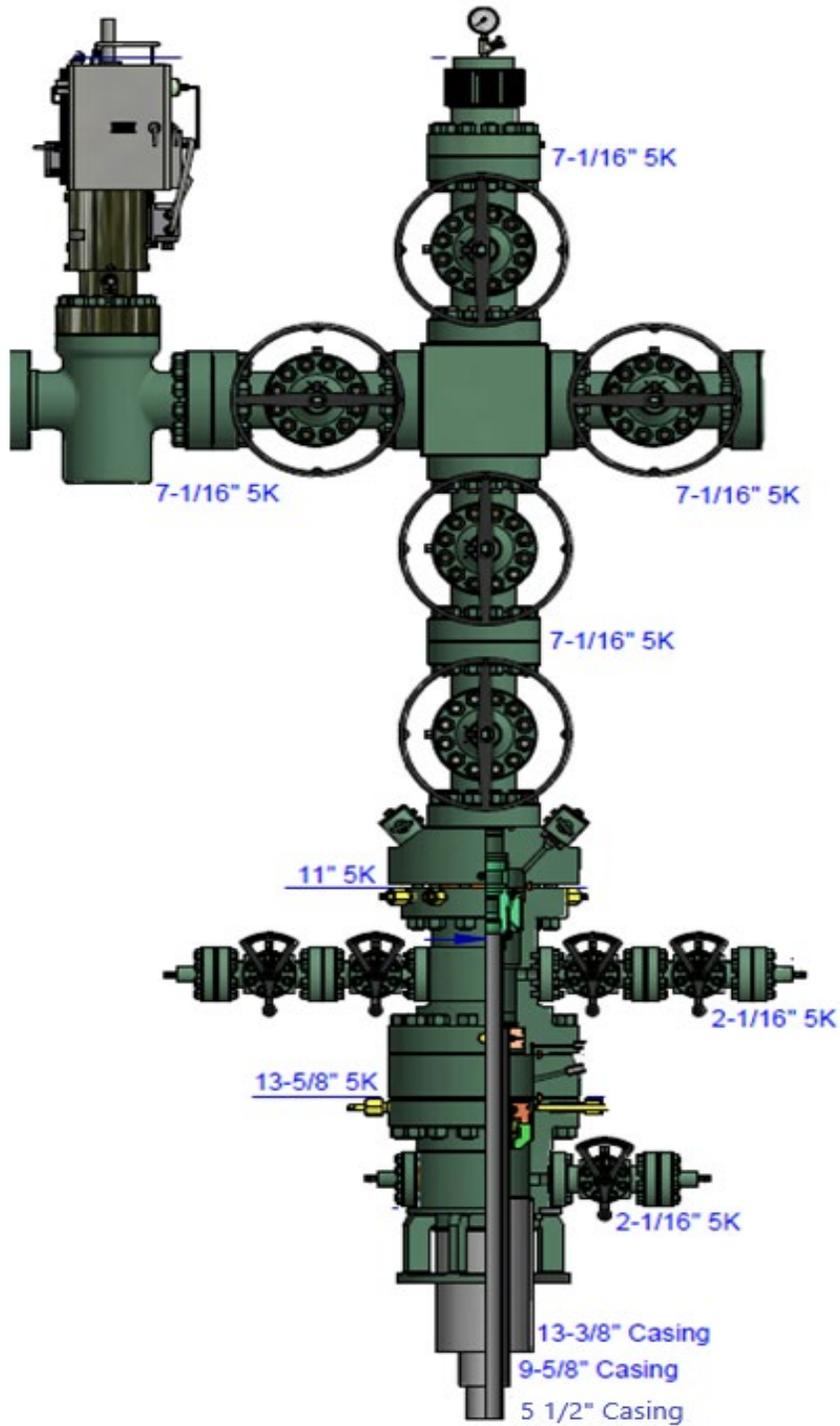


Figure 5-2. Proposed Deadwood injection well CO₂-resistant wellhead schematic.

5.3 Logging Program

The proposed logging program is detailed in Table 5-4.

Table 5-4. McCall-1 Deadwood CO₂ Injection Well Proposed Logging Program

Section	Type	Depth, ft
17½" Hole	Open Hole: Resistivity, GR (gamma ray), SP (spontaneous potential), Temperature	0–2,000
	Cased Hole: CBL/VDL	0–2,000
12¼" Hole	Open Hole:	
	Induction Resistivity	2,000–7,800
	Density	2,000–7,800
	Neutron	2,000–7,800
	Sonic Dipolar	2,000–7,800
	GR	2,000–7,800
	Caliper	2,000–7,800
	Temperature Log	2,000–7,800
	SP	2,000–7,800
	Spectral GR	2,000–7,800
	Full-Bore Formation Microimager	4,400–7,800
	Cased Hole:	
	CBL–VDL–Ultrasonic	2,000–7,800
	Temperature – Calibration DTS	0–7,800
8½" Hole	Open Hole:	
	Induction Resistivity	7,800–10,000
	Density	7,800–10,000
	Neutron	7,800–10,000
	Sonic Dipolar	7,800–10,000
	GR	7,800–10,000
	Caliper	7,800–10,000
	Temperature Log	7,800–10,000
	SP	7,800–10,000
	Spectral GR	8,500–10,000
	Full-Bore Formation Microimager	8,500–10,000
	10 SWC (sidewall coring: seals, injection zones)	Depth by log
	5 Fluid Samples (injection zones)	Depth by log
	25 MDT (modular formation dynamics tester: injection zones)	Depth by log
Cased Hole:		
CBL–VDL–Ultrasonic	7,300–10,000	
Casing Inspection Log – Through Tubing	0–10,000	
Active Pulse Neutron – Through Tubing	8,500–10,000	

5.4 BOP Equipment (BOPE)

1. BOPE must be API-monogramed and adhere to API Standard 53, Specifications 16A and 16C, at a minimum, and meet or exceed all applicable regulatory specifications (Figure 5-3).
2. BOPE other than annular preventers must have a minimum working pressure exceeding the maximum anticipated surface pressure (MASP).
3. All BOPE stacks must incorporate a set of blind or blind/shear rams.
4. Blind rams must be located in the lower ram cavity of a two-ram stack or middle ram cavity of a three-ram stack.
5. Choke and kill line outlets must be located below the blind rams on either a three- or two-ram stack.
6. All rigs must have a calibrated trip tank. The trip tank and trip sheet are used to measure the fluid required to fill or displace from the hole during all tripping operations, including casing or completion string running. Trip sheets must include number of joints or stands run into or pulled from the hole versus the calculated and actual displacements per step and running total as a minimum.
7. A full opening safety valve (FOSV) and an inside BOP safety valve (IBOPSV) must be always available on the rig floor for each drill pipe, drill collar size, and connection type in use. The FOSV is used to stab into the string and shut off flow through the drill string. The IBOPSV is used **above** the FOSV to prevent backflow through the drill string. The tools must remain in the fully open position until installed.

Note: This requirement is in addition to any integral safety valve in the top drive system inclusive of casing running operations. In the event of a power failure on a VFD (variable frequency drive) rig, it is impossible to slack off and make up the top drive to the string; therefore, an additional independent stabbing valve(s) is needed on the floor at all times.

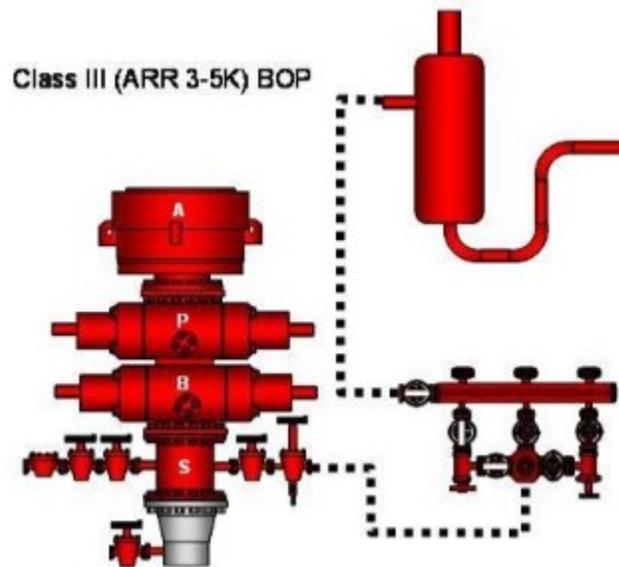


Figure 5-3. Proposed Deadwood Injection Well BOP schematic.

8. If a wireline lubricator is utilized for wireline operations, it should not be the type that slips into and is held by the annular preventer or rams. A hydraulic cutter or other means of safely cutting the wireline must be available if a lubricator is not in use.
9. Pressure-energized metal ring gaskets must be used on flanged well control equipment. The gaskets must not be reused on equipment that will be nipped up on the wellbore.

5.4.1 Choke Manifolds and Kill Line

1. The choke manifold must be API-monogrammed, meet API Spec. 16C at a minimum, and meet or exceed all applicable regulatory specifications.
2. All BOPE must include a choke manifold with at least one remotely operated choke and one manual choke installed. The control panel must contain calibrated drill pipe and casing pressure gauges that must be both accurate and maintained. The choke manifold casing pressure should have the capability of being recorded on the rig drilling recorder. If necessary, for clear dialogue, an electronic means of direct communication with the driller should be in place. This equipment must be tested and calibration-checked at each casing shoe, as well as at every BOPE test, and will be logged on every BOPE test report.
3. Flare/vent lines must be as long as practical, a minimum of 150' from well center, as straight as possible, without sumps, collection areas, or uphill flow areas (to prevent fluids buildup and resulting backpressure), and securely anchored.

5.4.2 Closing Units

1. BOPE closing units must adhere to API Spec 16D and API STD 53 at a minimum and meet or exceed all applicable regulatory specifications.
2. BOPE control systems must include full controls on the closing unit, and at least one remote control station. One control station must be located within 10 feet of the drillers console.
3. The BOPE closing unit must have two separate charging pumps with two independent power sources, as specified in API Spec. 16D, or N₂ bottle backup.
4. Closing units must have sufficient usable hydraulic fluid volume with pumps inoperative, to close one annular preventer, close all ram preventers, and open one HCR (high closing ratio) valve against zero wellbore pressure with 200 psi remaining pressure above the precharge pressure.

5.4.3 Pressure Testing

1. BOPE components (including the BOP stack, choke manifold, and choke lines) must be pressure-tested at the following frequency:
 - a. When installed. If the BOPE is stump-tested, only the new connections are required to be tested at installation.
 - b. Before 21 days have elapsed since the last BOPE pressure test. When the 21-day test is due in the near future, consider testing BOPE prior to drilling H₂S, abnormal pressure, or any lost return zones in order to avoid testing while drilling these intervals.
 - c. Anytime a BOPE connection seal is broken, the break must be pressure-tested.
 - d. When utilizing tapered strings, variable bore-type rams and annular preventer must be pressure-tested with all tubing or drill pipe sizes anticipated to be used.

2. BOPE should be tested using a test plug or other means to isolate the casing and open hole from the test pressures. The casing head valve should be opened and monitored to avoid exerting BOPE test pressure on the casing or open hole.
3. BOP components must first be low-pressure-tested to between 250 and 350 psi. If during the test, the pressure exceeds 350 psi, the pressure must be bled off to 0 psi and the test restarted. Pressuring up beyond 350 psi can induce a seal and give a false test result.
4. BOPE components, excluding the annular preventer, must be tested to the lesser of Rated Working Pressure (RWP) or wellhead RWP, if less than BOPE RWP. The annular preventer must be tested to 70% of its RWP. In all cases, the test pressure must not exceed the RWP of any components being tested.
5. Use of a cup tester should be avoided. If a cup tester is utilized for BOP testing, consideration must be given to casing burst pressure and possible pressure applied to the casing string or open hole below the cup tester in the event of a leaking cup tester.
6. An accumulator closing test must be performed after the initial nipple up of the BOP, after any repairs that required isolation or partial isolation of the system, or at initial nipple up on each well.
7. During the course of drilling, the pipe rams must be functionally operated at least once every 24-hour period. The blind rams must be functionally operated each trip out of the wellbore.

5.4.4 Wellhead

- Casing head 13⁵/₈" – 5K flanged.
- Two 2¹/₆" valves in casing head.
- Tubing spool 13⁵/₈" 5K × 11" 10K flanged.
- Production tree assembly 7¹/₆" 10K FF: two master valves, cross, one swab valve, tubing hanger 11" × 7" FF.

APPENDIX A

DATA, PROCESSING, AND OUTCOMES OF CO₂ STORAGE GEOMODELING AND SIMULATIONS

DATA, PROCESSING, AND OUTCOMES OF CO₂ STORAGE GEOMODELING AND SIMULATIONS

INTRODUCTION

Minnkota Power Cooperative's (Minnkota's) Tundra SGS (secure geologic storage) site located proximate to the Milton R. Young Station (MRYS) has been a focus of investigation of future potential commercial-scale carbon dioxide (CO₂) injection within the sandstones of the Black Island and Deadwood Formations. The Tundra SGS site is located near Center, North Dakota, in the south-central portion of the Williston Basin.

Multiple sets of publicly available data, including well logs and formation top depths, were acquired from the online database of the North Dakota Industrial Commission (NDIC). Site-specific data, which were collected as part of storage reservoir characterization efforts and included geophysical well logs, petrophysical analyses, formation fluid analyses, and surface seismic surveys, were also used in the model construction. Two 3D seismic surveys were collected over the Tundra SGS site, and two stratigraphic test wells were drilled to augment data available from offset wells in the study area. Data collected from these sources were incorporated into a geologic model of the Black Island and Deadwood Formations and the overlying and underlying sealing formations. Simulated CO₂ injection studies were conducted to determine the wellhead and downhole pressure response resulting from injection and displacement of injected CO₂ within the Black Island Formation and Deadwood Formation E and C Members. Reservoir conditions observed from the stratigraphic test wells were used to characterize and establish initial conditions. Results of the injection studies were then used to determine the project's area of review (AOR) pursuant to North Dakota's geologic CO₂ storage regulations.

The well logs acquired in the J-LOC1 and J-ROC1 wells (NDIC file numbers 37380 and 37672, respectively) (Figure A-1) were used to pick formation top depths, interpret lithology, estimate petrophysical properties, and determine a time–depth shift for seismic data. Formation top depths were picked from the top of the Pierre Formation to the top of the Precambrian basement. Regional formation top depths from wellbores within a 56-mile radius around the proposed storage site were added to the J-LOC and J-ROC1 site-specific data to understand the geologic extent, depth, and thickness of subsurface geologic strata. Lateral structure trends from the acquired seismic data were used to reinforce interpolation of the formation tops to create structural surfaces that served as inputs for geologic model construction.

Core samples obtained from the J-LOC1 wellbore were analyzed as inputs for modeling and simulation. These analyses included x-ray fluorescence (XRF), x-ray diffraction (XRD), thin sections, porosity, and flow measurements. Knowledge gained from these site-specific core data analyses and well logs collected from the J-LOC1 wellbore were used to determine Black Island and Deadwood Formation lithologies in legacy wellbores throughout the area for which no core data were collected. Lithologies assigned to each wellbore were then used to generate the lithofacies properties of the injection zone. Eleven offset wells with porosity logs were used to inform petrophysical property distributions in addition to the core data from J-LOC1. The various data sets derived from J-LOC1 and J-ROC1 showed good agreement with the offset well data available near the J-LOC1 site.

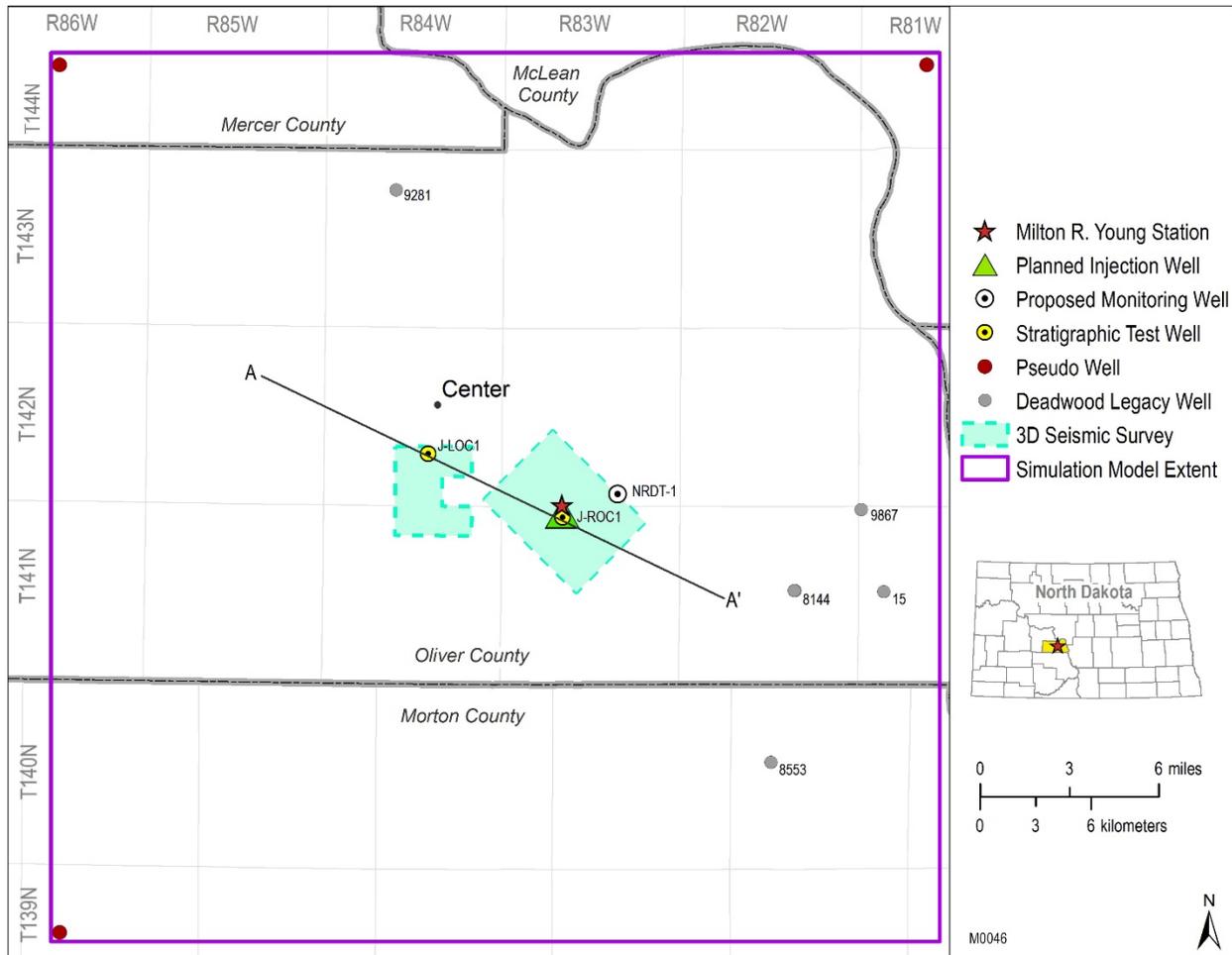


Figure A-1. Map of the geologic model boundary (purple polygon), seismic surveys (green polygons), pseudowells (NE-pseudo, NW-pseudo, and SW-pseudo represented as red circles) and nearby Deadwood wells.

A geologic model was constructed using Schlumberger’s Petrel software suite (Schlumberger, 2020). Petrel is a software platform that allows for the development of geologic models using well and seismic data in combination with geostatistics. The geologic model is a digital representation of the subsurface geology, including the proposed CO₂ storage reservoir and its primary confining zones. The upper confining zone includes (descending order) the Roughlock and Icebox Formations Figure (A-2). The upper 50 ft of the Precambrian basement was included to test confinement of injection pressure to the Deadwood B Member shale in simulation. Geologic properties were distributed within the 3D model as inputs for numerical simulations of CO₂ injection to predict the migration of CO₂ and pressure effects throughout the storage reservoir. These geologic properties included 1) lithofacies (bodies of rock with similar geologic characteristics) which were used to assign relative permeability curves 2) porosity, and 3) permeability.

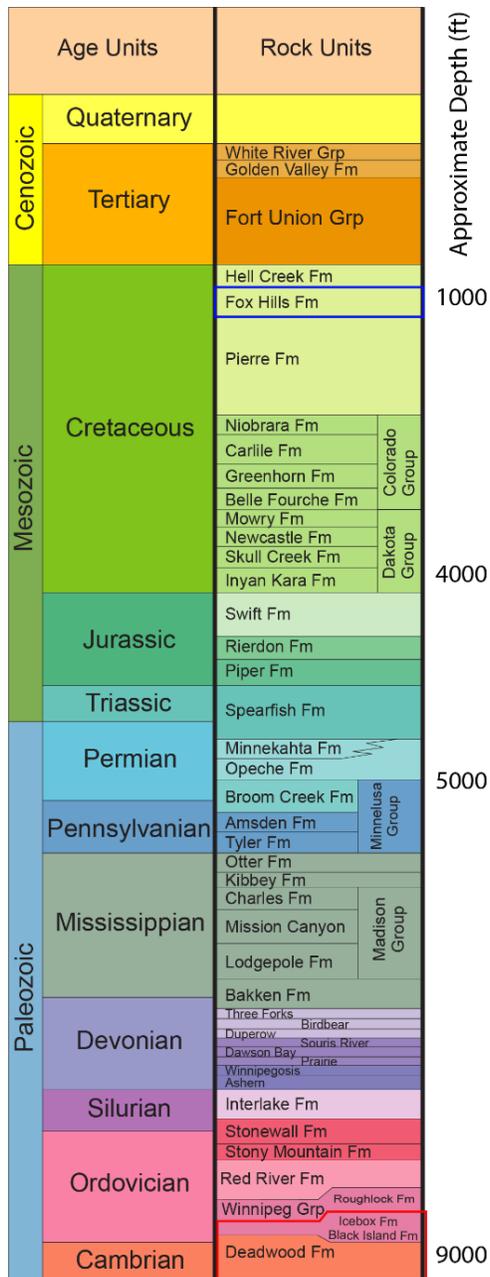


Figure A-2. Stratigraphic column identifying the storage reservoir and confining zones (red polygon) and lowest underground source of drinking water (blue polygon) for the geology underlying the Tundra SGS storage facility area.

The geologic model provided the basis for inputs of fluid flow simulations using Computer Modelling Group's (CMG's) GEM software (Computer Modelling Group, 2019). Fluid flow properties, such as the relative permeability and capillary pressures associated with each lithofacies, were determined by mercury injection capillary pressure (MICP) measurements of representative core samples from their respective formations, and then adjusted for the geomodel-inferred average porosity of each lithofacies in the model. Finally, the fluid flow simulation permeability was tuned using a permeability multiplier based on measured permeability during brine injectivity tests conducted within the injection zone. This tuned simulation to site-specific injectivity testing and core sample data was utilized to simulate expected CO₂ injection capacity and the resulting CO₂ plume and pressure plume throughout the project life and postinjection period.

GEOLOGIC MODEL DEVELOPMENT

The activities performed to characterize the injection zone, overlying formations, and underlying confining formations included data aggregation, structural modeling, data analysis, and property distribution. Major inputs for the geologic model, which acted as control points during distribution of the geologic properties throughout the modeled area, included seismic survey data, geophysical well logs from nearby wells, and core sample measurements.

Structural Framework Construction

Schlumberger Petrel software was used to interpolate structural surfaces for the Icebox, Black Island, and Deadwood Formations and Precambrian basement. Input data included formation top depths from the online NDIC database and supported by conventions described in literature (LeFever and others, 1987), data collected from the J-LOC1 and J-ROC1 wells, and 3D seismic surveys conducted at the site. The interpolated structural data were used to constrain the model extent in 3D space.

Data Analysis and Property Distribution

Confining Zones (Icebox Formation, Deadwood B Member)

The Icebox Formation and Deadwood B Member were assigned shale lithofacies; classifications were determined as primary lithologic constituents through well log analysis. Porosity and permeability logs were upscaled to the model to serve as control points for property distributions. The control points were used in combination with variograms and Gaussian random function simulations to distribute properties. Variograms model spatial variance of data in lateral and vertical directions to allow for interpolation through geostatistical methods. A variogram with a major axis range of 6,500 ft, minor axis range of 6,000 ft, and an azimuth of 90° was used for the Icebox Formation. In the Deadwood B Member, a variogram with major and minor axis lengths of 5,000 ft with an azimuth of 0° was used. A vertical variogram length of 6 ft was used for all confining zones.

Injection Zone (Black Island and Deadwood Formations)

Seismic data were resampled to match the resolution of the geologic model grid and used to determine variogram direction and an estimate of ranges by creating a variogram map. A variogram map is a 2D representation of the variograms calculated for all directions (0°–359°) for

the input data. Variogram mapping investigations indicated that geobody structures with the following dimensions are present in the Black Island Formation: major and minor axis ranges of 5,000 ft. In the Deadwood E Member, investigation indicated major axis range of 5,500 ft, minor axis range of 5,000 ft, and an azimuth of 155°. In the Deadwood C Member sandstone, investigation indicated major axis range of 6,000 ft, minor axis range of 5,500 ft, and an azimuth of 30°. Well logs recorded from J-LOC1 and J-ROC1 and offset wellbores served as the basis for deriving a vertical variogram length of 6 ft.

Available sonic well logs (ΔT) and bulk density (RHOB) in the area were transformed to acoustic impedance (AI) logs ($AI = RHOB * 1,000,000 / \Delta T$) to aid in discovering trends between well log data and seismic AI data. The AI from 3D seismic surveys (east and west) was edited to remove edge effects. The east 3D AI range was rescaled into alignment of the west 3D prior to combining the volumes to account for the differences in acquisition methods.

The AI logs were smoothed to resolve vertical resolution differences between the seismic and well log resolutions. By using an arithmetic smoothing window centered on each depth point, the smoothed well log AI with a 40-ft sampling window, AI_40, provides the best correlation to the seismic AI and to well AI. A correlation coefficient of 0.609 was observed between the smoothed AI_40 logs and seismic AI. Also, a decent correlation of 0.7353 was seen between AI_40 and initial AI data (Figure A-3). This correlation allows for a high level of control when using seismic results to apply trends during property distributions.

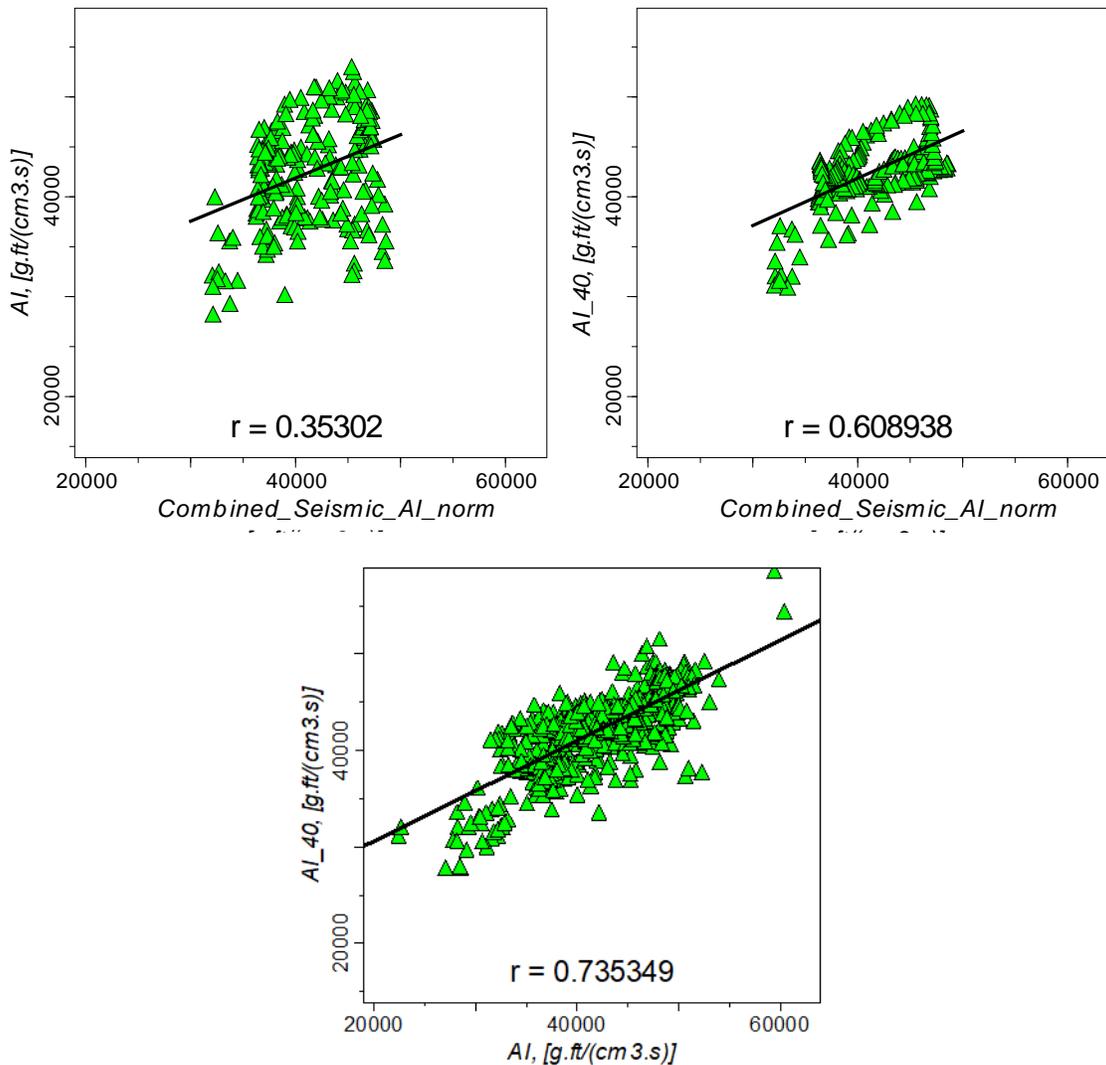


Figure A-3. Correlation coefficient between well log-derived AI and seismic AI data: 1) correlation coefficient of 0.3530 was determined based on the initial data (top left panel), 2) correlation coefficient of 0.6089 was determined after performing smoothing over a 40-ft window to resolve vertical resolution differences (top right panel), and 3) correlation coefficient of 0.7353 was determined based on the initial data (AI) and smoothed data (AI_40) (bottom).

The AI₄₀ logs were distributed over the seismic area using Gaussian random function simulation, the upscaled pointset, and variogram structures described previously for each zone. Then the AI logs were distributed throughout 3D volume using the same variogram parameters described previously and cokriged with the distributed AI₄₀ for each zone with a colocated cokriging coefficient of 0.75 (Figure A-4). The distributed AI property (Figure A-5) was used to distribute lithofacies and petrophysical properties to better link them to the seismic data.

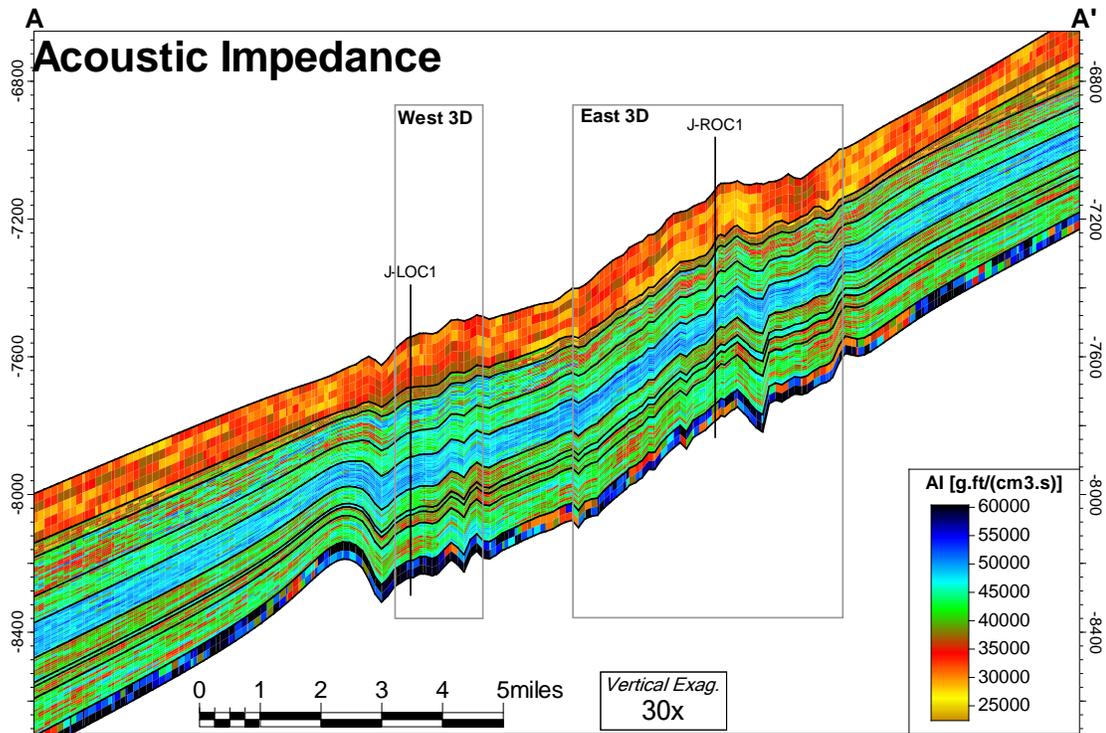


Figure A-4. Distributed AI property along the NW–SE cross section. The distributed property was used to distribute lithofacies and petrophysical properties to seismic data. Vertical units on the y-axis are displayed as feet below mean sea level (30× vertical exaggeration shown).

Because of the low count of well logs containing both ΔT and RHOB logs immediately near the J-LOC1 and J-ROC1 wellsites, three pseudowells were added to the geologic model: one at the northeast (NE-pseudo), one at the northwest (NW-pseudo), and one at the southwest (SW-pseudo) corners of the model boundary (Figure A-1). The well log AI, bulk density, neutron porosity, sonic, resistivity, gamma ray, effective and total porosity, volume of clay, and permeability data from offset wells from both outside and inside the bounds of the model were projected onto the pseudowells. The values of the offset well logs were weighted using inverse distance squared to project the ΔT and RHOB logs to the pseudowells. These data were used to help control AI distribution outside of the seismic boundary to the edges of the model boundary.

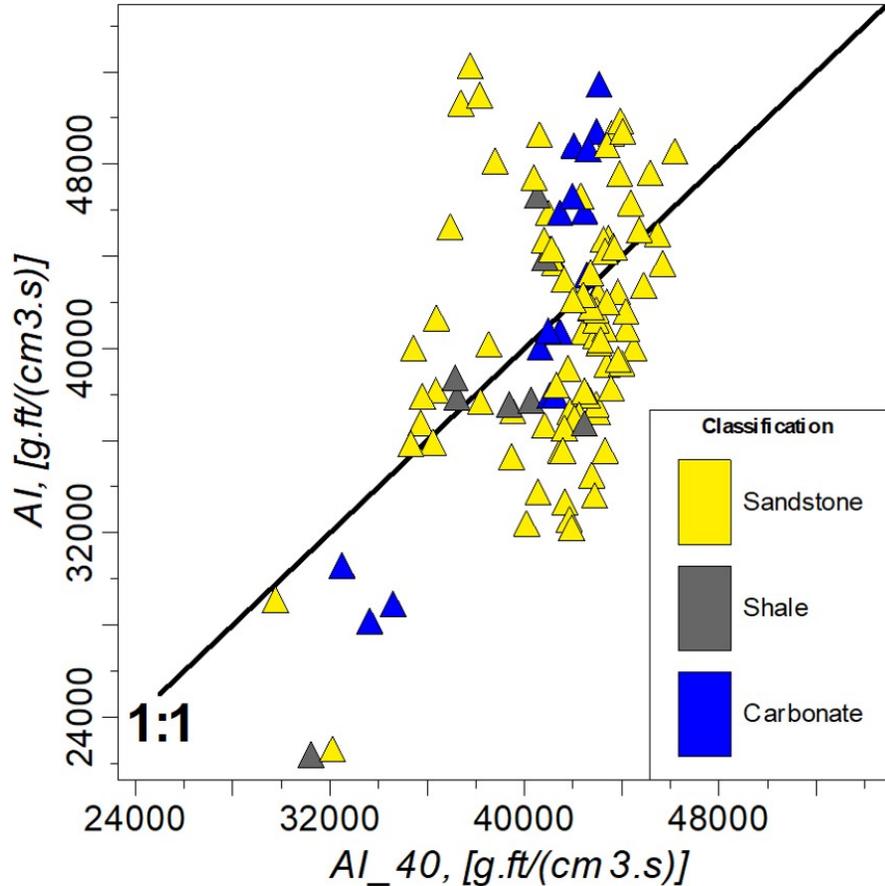


Figure A-5. Upscaled AI vs. upscaled AI₄₀ for Black Island Formation, Deadwood E Member, and Deadwood C Member sandstone. Points representing upscaled cells are colored by interpreted lithology: yellow represents sandstone, dark blue represents carbonate, and gray represents shale. AI₄₀ provided a better separation between sandstone facies and shale facies, while AI has a slight separation between carbonate and noncarbonate facies.

Lithofacies classification was determined from well log data and correlated with descriptions of core taken from the J-LOC1 well. Facies logs were upscaled into a structure grid with an average cell size of 500 ft × 500 ft × 5 ft (I, J, and K directions, respectively). Trend modeling was employed to build a 3D probability trend for each lithofacies utilizing the AI and smoothed AI (AI₄₀). The trend model used an isometric 10,000-ft variogram length and simple kriging type. Figure A-5 demonstrates the better facies separation between sandstone and nonsandstone facies using AI₄₀ rather than AI. The slight facies separation between carbonate and shale facies is seen using AI rather than AI₄₀. Along with the 3D probability trends for each facies, facies distributions were performed using sequential indicator simulation. Variogram models described previously guide the distribution of facies in each zone (Figures A-6 and A-7).

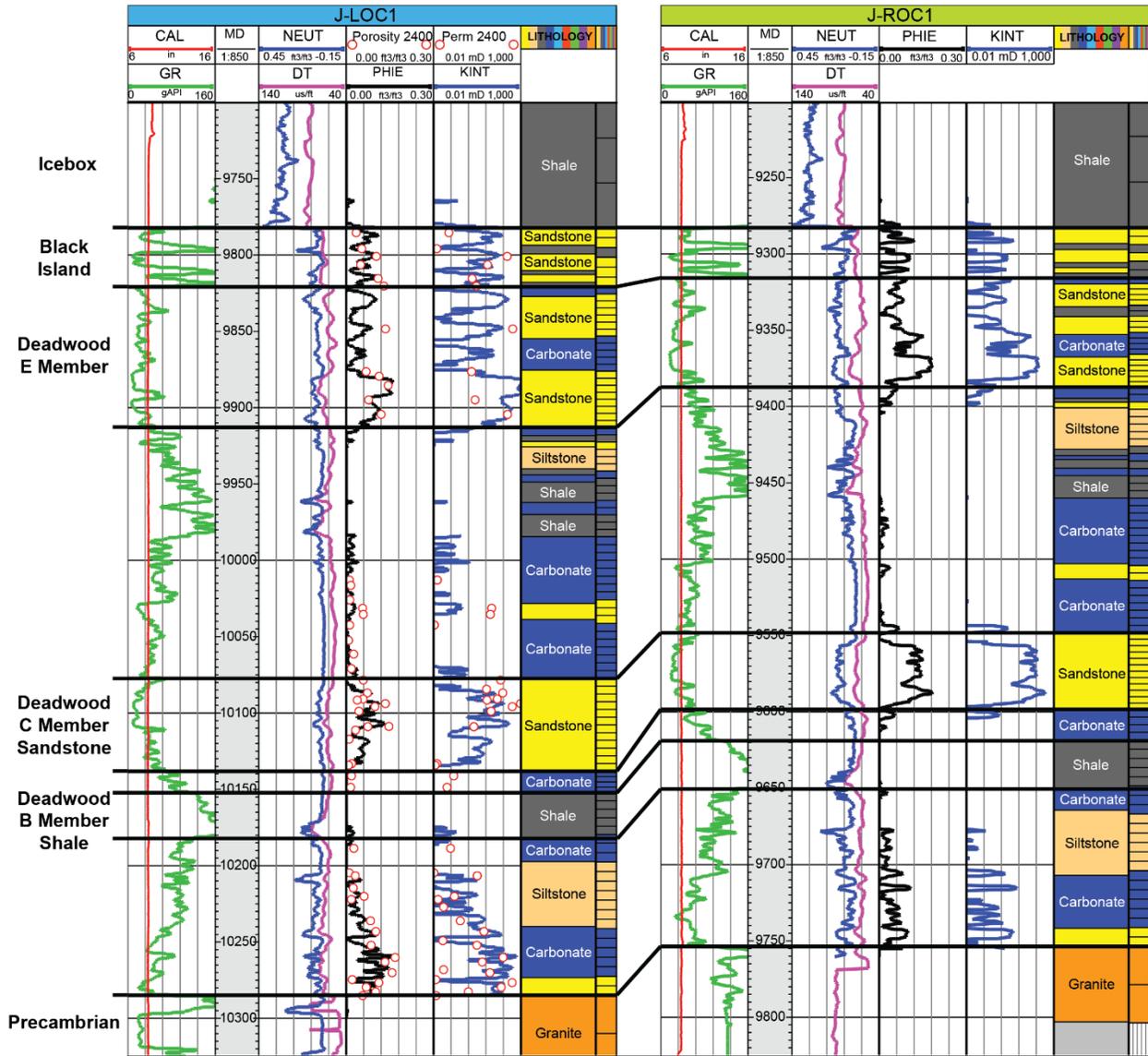


Figure A-6. Lithofacies classification in wells J-LOC1 and J-ROC1. Logs displayed in tracks from left to right are 1) gamma ray (green) and caliper (red), 2) measured depth in feet, 3) neutron porosity (dark blue) and delta time (purple), 4) effective porosity (black) and core porosity (red dots), 5) permeability (dark blue) and core permeability (red dots), 6) interpreted lithology log, and 7) upscaled lithology.

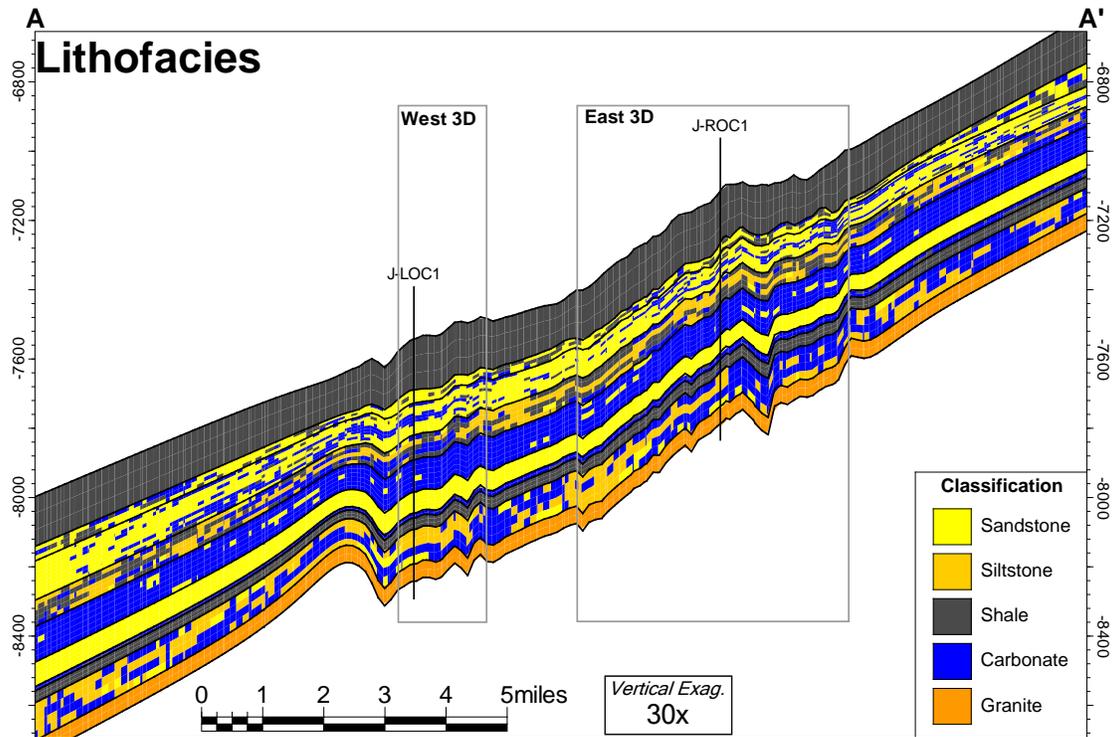


Figure A-7. Lithofacies distribution along the NW–SE cross section. Sandstone and carbonate distributions correlate well with the AI property. The heterogeneity observed across the seismic data is matched outside seismic control (Figure A-4). Vertical units on the y-axis represent feet below sea level (30× vertical exaggeration shown).

Prior to distributing the porosity and permeability properties, core porosity and permeability measurements from the J-LOC1 well were compared with effective porosity (PHIE) well logs and permeability estimated from the Wyllie–Rose (Wyllie and Rose, 1950) model utilizing the Morris–Biggs parameters (Morris and Biggs, 1967) to ensure good agreement between the two data sets (Figure A-6). Total porosity (PHIT) was upscaled to the model to be used as control points for distribution. PHIT was distributed by zone and lithology using Gaussian random function simulation and variogram models described previously and cokriged with AI volume using a correlation coefficient of -0.88. PHIE was distributed (Figure A-8) using the same variables as PHIT and cokriged to PHIT with a correlation coefficient for each zone and lithology. Intrinsic permeability (KINT) was distributed using the same variables and cokriged to PHIE volume.

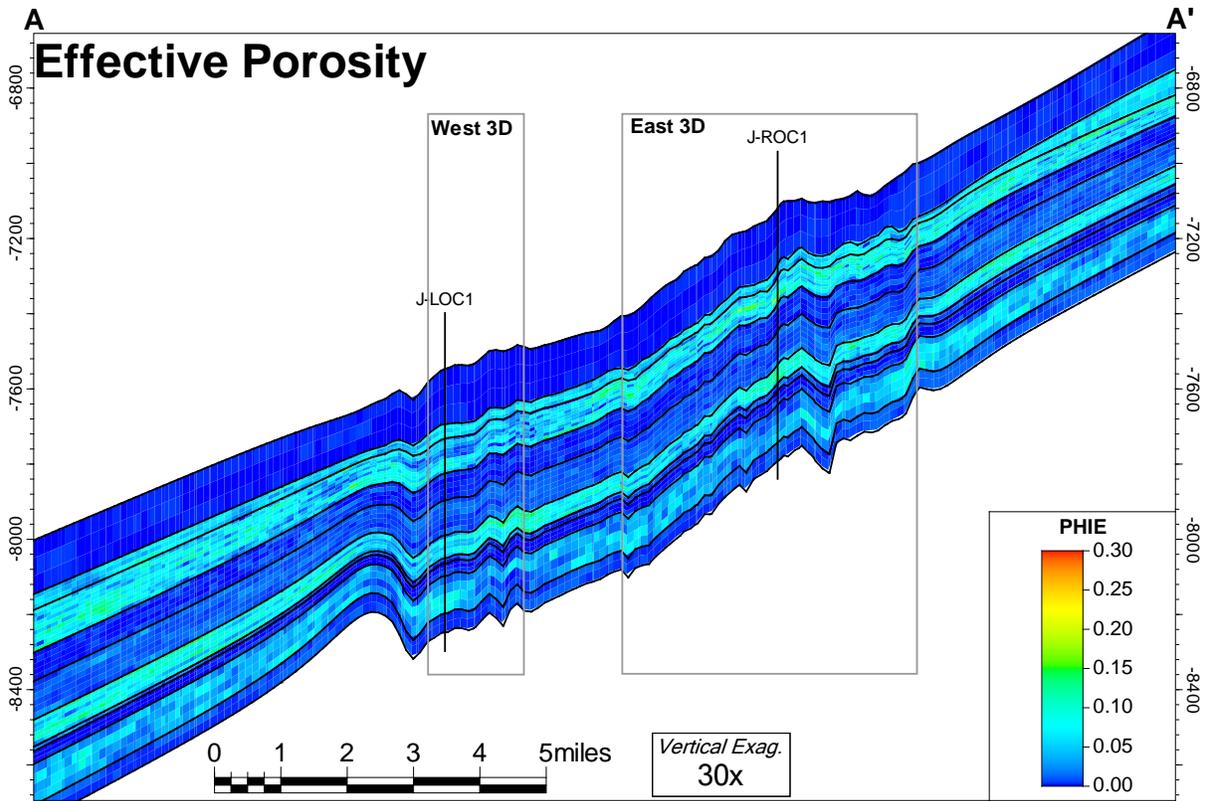


Figure A-8. Effective porosity distribution throughout the 3D gridded volume along NW-SE cross section. Units on the y-axis represent feet below sea level (30× vertical exaggeration shown).

Numerical Simulation

Numerical simulations of CO₂ injection into the Deadwood Formation were conducted using the geologic model described above (Figure A-9). Simulations were carried out using CMG’s GEM, a compositional reservoir simulation module. Both calculated temperature and pressure, along with the reference datum depth, were used to initialize the reservoir equilibrium conditions for performing numerical simulation. A compositional simulator is one of the most mechanistically accurate methods to solve compositional multiphase fluid flow processes. Compositional simulators utilize cubic equations of state, such as Peng–Robinson’s, which calculates thermal dynamic properties of fluids within the reservoir, including the resulting mixture of fluids when CO₂ is injected into the saline formation. During the simulation process for this study, the compositional EOS (equation of state) simulator accounts for and estimates CO₂ solubility, residual gas trapping, and flow dynamics through a duration of time.

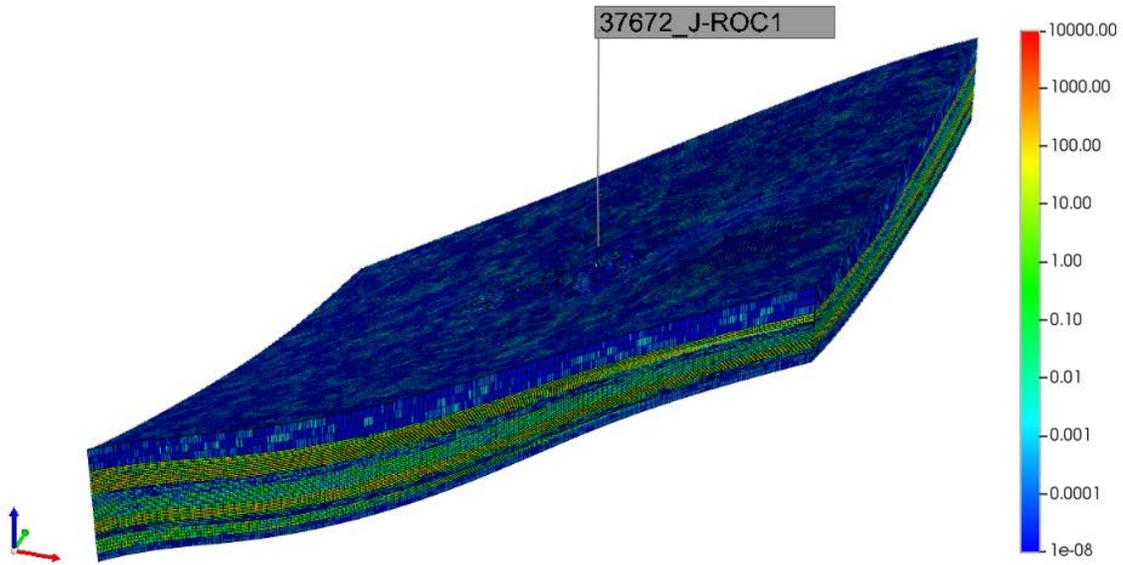


Figure A-9. The 3D view of the simulation model with the permeability property displayed. Note the low-permeability layers (dark blue) at the top and bottom of the figure. These layers represent the Icebox Formation (upper) and the Precambrian basement (lower). The varied permeability of the Black Island and Deadwood Formations is observed in between these layers. Vertical exaggeration is 40×.

The simulation model boundaries were assigned infinite-acting conditions to allow lateral water flux and pressure dispersion through the simulated-boundary aquifer. The reservoir was assumed to be 100% brine saturated with an initial formation salinity of 256,000 ppm total dissolved solids (TDS). Simulations performed allowed CO₂ to dissolve into the native formation brine. Both the relative permeability and the capillary pressure data for the Deadwood were analyzed and generated for three representative rock types in the simulation (sandstone/siltstone, shale/granite, and carbonate/dolostone) through Core Labs MICP evaluation and Energy & Environmental Research Center (EERC) laboratory analysis (Figures A-10 through A-12). The MICP-measured capillary pressures were adjusted to CO₂-brine pressures based on theoretical predictions of CO₂-brine contact angles and interfacial tensions. These CO₂-brine capillary pressures were further adjusted to account for the simulation-predicted average porosity and permeability compared to the MICP sample measured porosity and permeability.

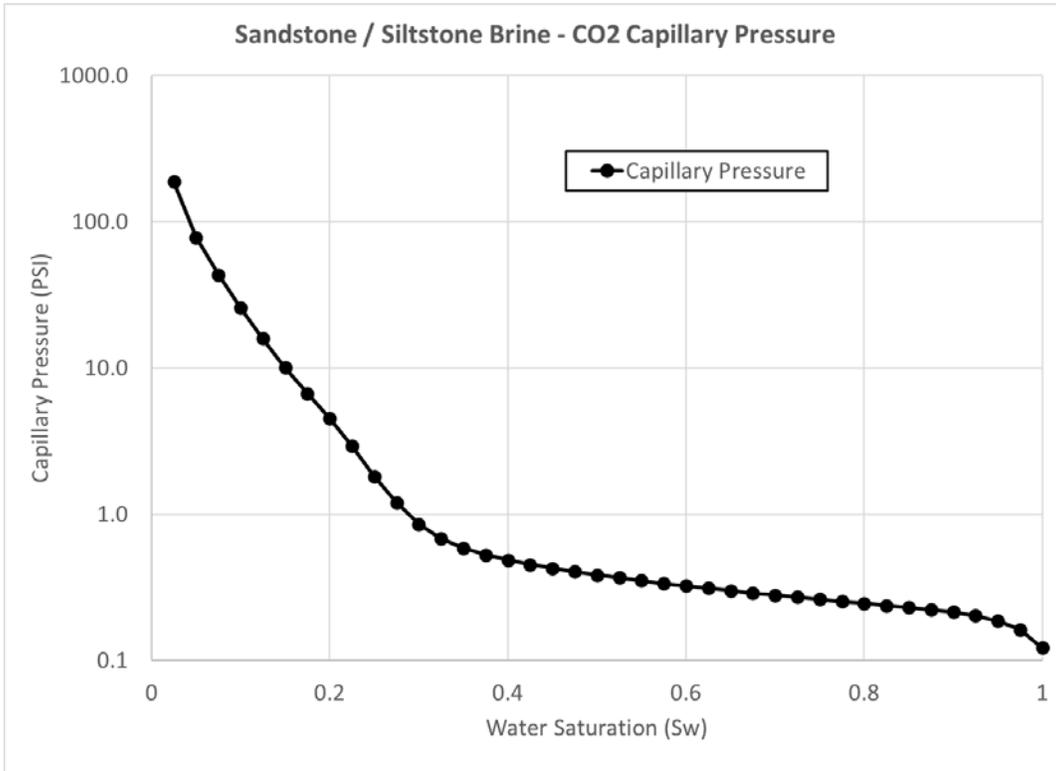
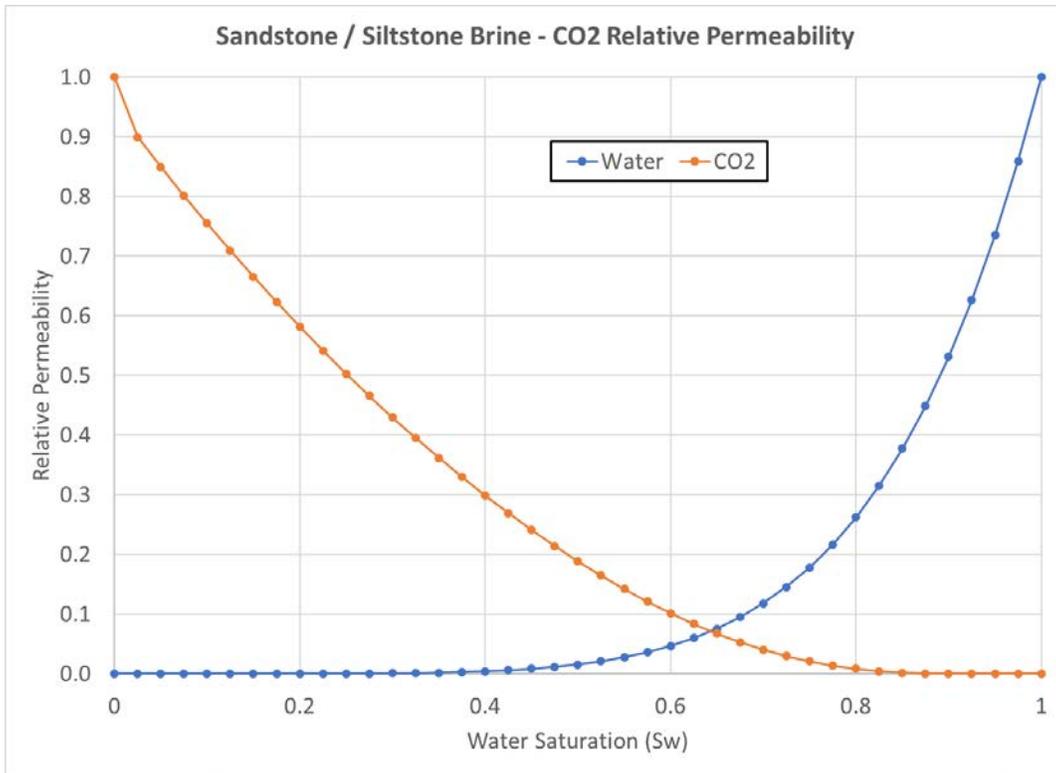


Figure A-10. Relative permeability (top) and capillary pressure curves (bottom) for the sandstone and siltstone rock types in the Black Island and Deadwood Formations.

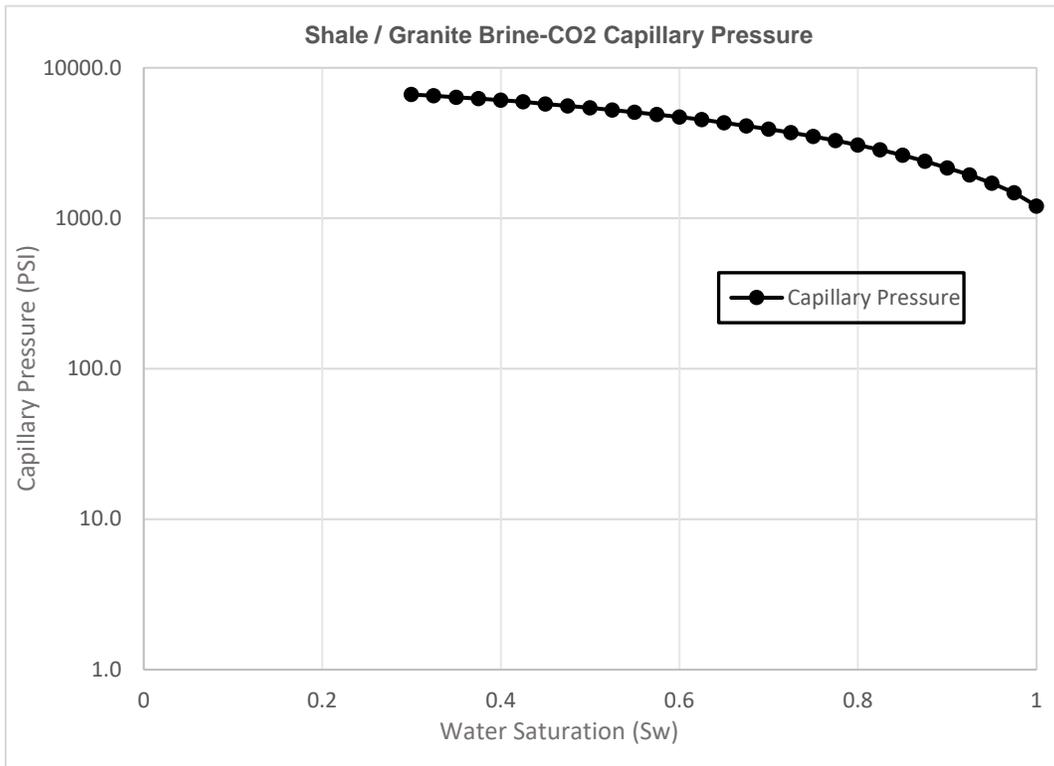
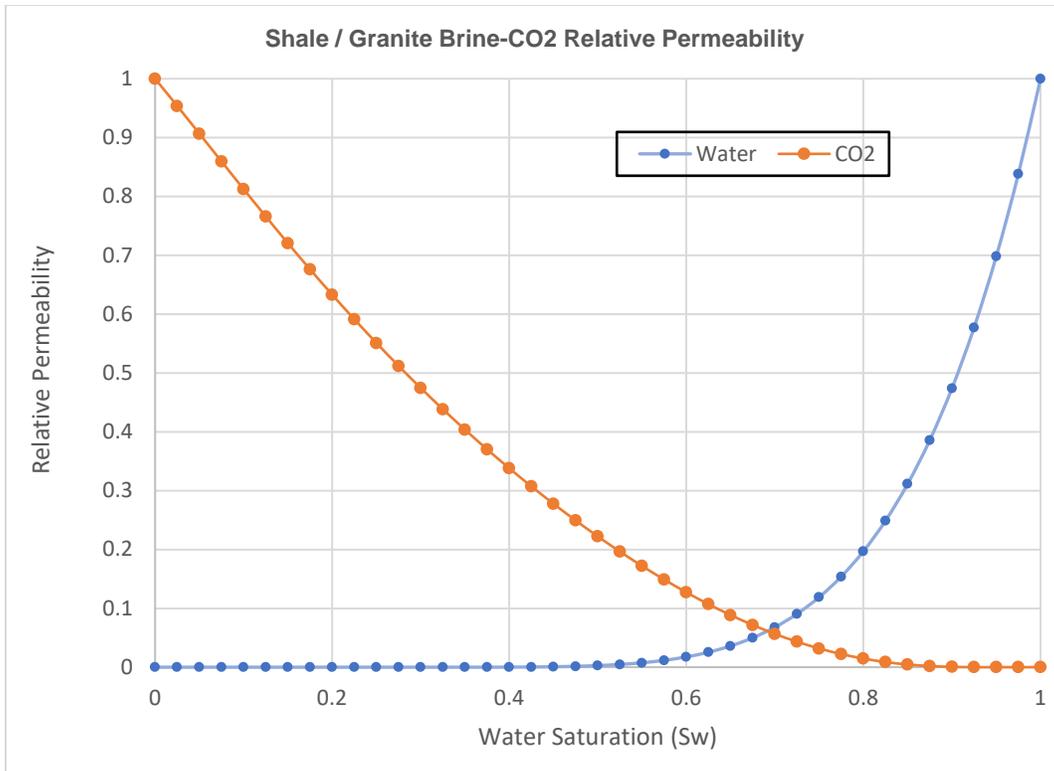


Figure A-11. Relative permeability (top) and capillary pressure curves (bottom) for the shale in the Icebox, Black Island, and Deadwood Formations and for the Granite in Precambrian.

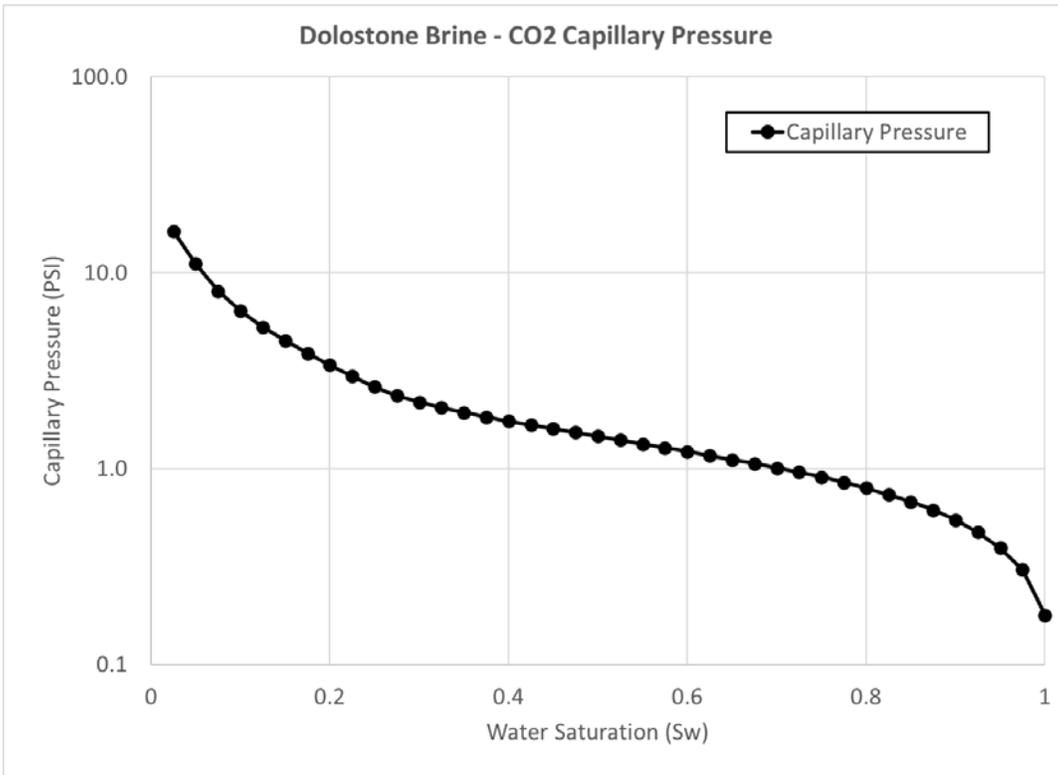
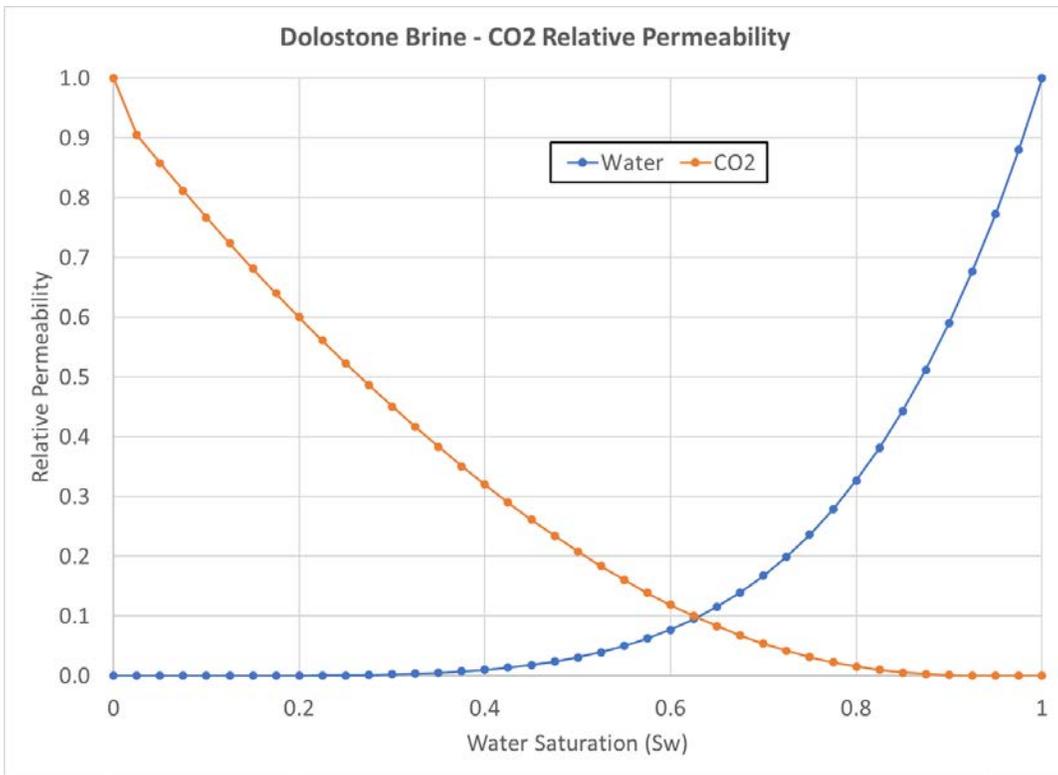


Figure A-12. Relative permeability (top) and capillary pressure curves (bottom) for the carbonate/dolostone rock type in the Black Island and Deadwood Formations.

Capillary entry pressure data included in the dynamic reservoir simulation model were derived from core testing. The capillary entry pressure value applied to the Ice Box shale layers in the model was determined by deriving a ratio between the reservoir quality index of Ice Box core samples and modelled properties to scale the capillary entry pressure value derived from core testing (Table A-1). The capillary entry pressure value derived from core sample testing, 0.16 psi, was applied to the Deadwood and Black Island sand lithologies in the model. A core sample was not collected from carbonate intervals in the Deadwood and Black Island, so capillary entry pressure data from Broom Creek carbonate samples was applied to the carbonate lithologies in the model in combination with a multiplication factor derived from the ratio of reservoir quality index between the core sample and modelled properties (Table A-1). Samples tested within the Deadwood and Black Island Formation included sandstone, shaly sandstone and shaly arkose lithologies. Therefore, the capillary entry pressure values from the Ice Box shale were used for the Deadwood and Black Island shale lithologies in the simulation model.

Table A-1. Core and Model Properties Showing the Multiplication Factor Used to Calculate Capillary Entry Pressure Used in the Model

Formation	Core			Model			
	Phi (fraction)	K, md	Capillary Entry Pressure, psi	Phi (fraction)	K, md	Capillary Entry Pressure, psi	Multiplication Factor
Deadwood and Black Island (carbonate)	0.048	0.00478	27	0.050**	39.3**	0.3	0.011
Icebox (shale)	0.036	0.00002	845	0.008***	1.45E-06***	1450*	1.75

* Maximum value allowed in CMG is 1450 psi, the scaled capillary entry pressure (1480 psi) exceeded this.

** Pore volume weighted average.

*** Pore volume weighted average of Icebox shale and Precambrian used to calculate multiplication factor.

Temperature data recorded from logging the J-LOC1 wellbore were used to derive a temperature gradient of 0.01°F/ft for the proposed injection site. In combination with depth, this temperature gradient was used to calculate subsurface temperatures throughout the geologic model of the study area. Pressure testing within the J-LOC1 well was performed with a modular formation dynamics tester (MDT) logging tool. Multiple pressure readings recorded from the Black Island and Deadwood Formations were used to derive a pore pressure gradient of 0.46 psi/ft (Table A-2). Combined with depth, this gradient was used to distribute pressure throughout the geologic model.

Table A-2. MDT Pressure Measurements Recorded from the J-LOC1 Well and Derived Formation Pressure Gradients

Test Depth, ft MD*	Formation Pressure, psi	Formation Pressure Gradient, psi/ft
9,800	4,507	0.46
9,885	4,548	0.46
9,885	4,548	0.46
10,087	4,651	0.46
10,254	4,734	0.46

* Measured depth.

Simulation model permeability was tuned globally by applying a multiplier to match reservoir properties estimated from a Deadwood Formation step rate test. Permeability multipliers were calculated by dividing the average permeability estimated from the injection test by the average model permeability over a certain distance from the J-LOC1 well. Using the model permeability averaged over a distance of approximately 750–1,250 ft from J-LOC1 and comparing it with the average permeability based on the injection test, the estimated multipliers ranged from 3.5–7.1×, with an average value of nearly 5×. Ultimately, a global multiplier of 5× was applied to the permeability properties before numerical simulations.

Table A-3 shows the general properties used for numerical simulation analysis in this study. The injection well, J-ROC1, is simulated as perforated across the entire Black Island Formation interval and across the Deadwood intervals C through E (the lowest two Deadwood intervals, A and B, were not perforated). The J-ROC1 well constraints and wellbore model inputs for the simulation model are shown in Table A-4.

Table A-3. Summary of Reservoir Properties in the Simulation Model

Average Permeability, mD	Average Porosity, %	Initial Pressure, P _i , psi	Salinity, ppm	Boundary Condition
Icebox: 7.25×10^{-7}	Icebox: ~0.12	~4,548.42	256,000	Open (infinite-acting)
Black Island: 9.81	Black Island: ~5.48			
Deadwood: 31.65	Deadwood: ~3.81			
Precambrian: 7.88×10^{-7}	Precambrian: ~0.74			

Table A-4. Well Constraints and Wellbore Model in the Simulation Model

Primary Constraint, Wellhead Pressure	Secondary Constraint, Bottomhole Injection Pressure	Tubing Size	Wellhead Temperature	Downhole Temperature
2,800 psi	6,179 psi	5.5 in.	90°F	181°F

Simulation Results

Simulations of CO₂ injection with the given well constraints, listed in Table A-4, predicted that the injection bottomhole pressure (BHP) will not exceed 6,179 psi during injection operations, assuming a wellhead pressure (WHP) limit of 2,800 psi (Figure A-13). Results of a stress test performed by an MDT tool in the J-LOC1 wellbore, conducted at a depth of 9,885.1 ft MD, estimated a fracture closure pressure of 7,417 psi, resulting in a fracture closure gradient of 0.750 psi/ft. The closure pressure gradient was used to calculate maximum BHP constraints, based upon 90% of the fracture closure pressure. Cumulative CO₂ injection at the above-described pressure conditions was approximately 23.4 million metric tons (MMt) over the 20 years of injection. The resulting average injection rate of CO₂ injected into the Black Island and Deadwood Formations over the 20 years of simulated injection was 1.17 MMt per year (Figure A-14).

During and after injection, free-phase (supercritical) CO₂ accounts for the majority of CO₂ observed in the model's pore space, but the mass of free-phase CO₂ declines during the postinjection period. Throughout the injection operation, a portion of the free-phase CO₂ is trapped in the formation's pores through a process known as residual trapping. Residual trapping can occur as a function of low CO₂ saturation and inability to flow under the effects of relative permeability. CO₂ also dissolves into the formation brine throughout injection operations (and continues afterward), although the rate of dissolution slows over time. The relative portions of free-phase, trapped, and dissolved CO₂ can be tracked throughout the duration of the simulation (Figure A-15).

The pressure plume shown in Figure A-16 shows the distribution of pressure increase in the Deadwood Formation during the 20-year injection period. Figure A-16 shows the average increase in pressure after 20 years of injection. The largest increase will appear in the near-wellbore area, where the maximum increase of 1,620 psi is estimated.

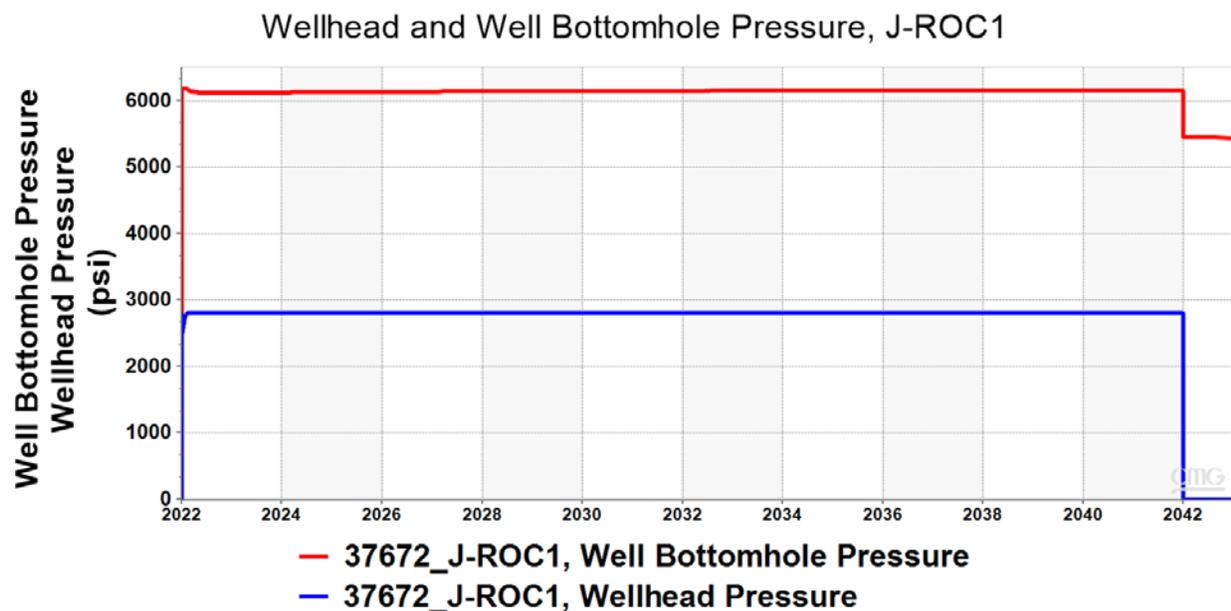


Figure A-13. WHP and BHP response with the expected injection rate.

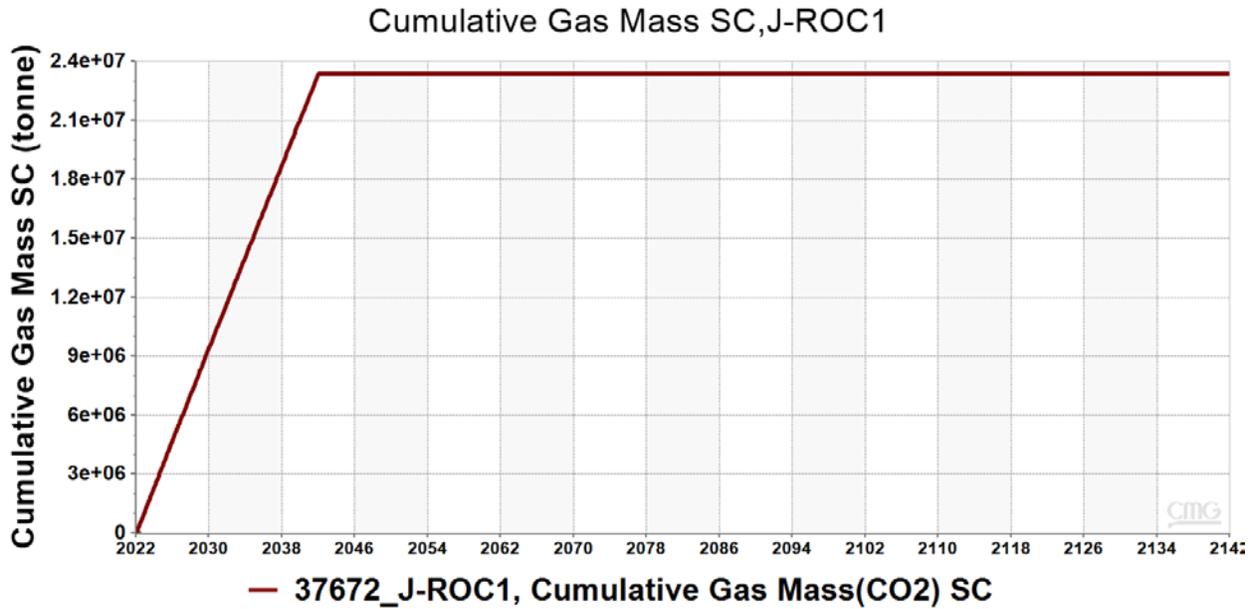


Figure A-14. Cumulative injected gas mass over 20 years of injection.

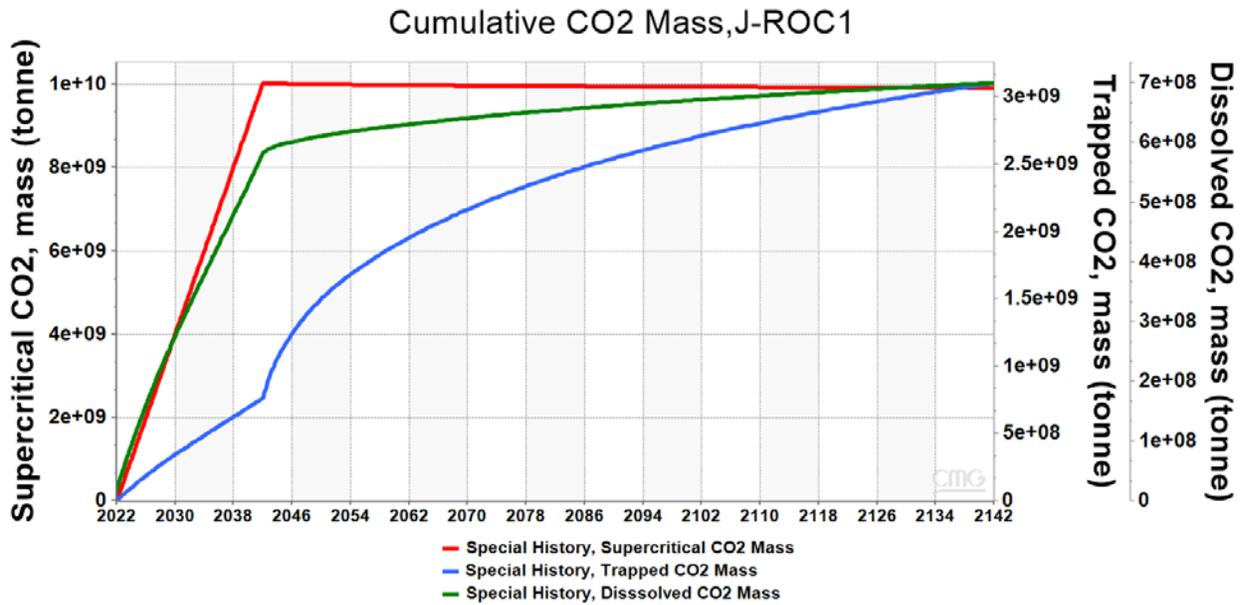


Figure A-15. Simulated total dissolved CO₂ in brine, supercritical-phase CO₂, and residually trapped CO₂.

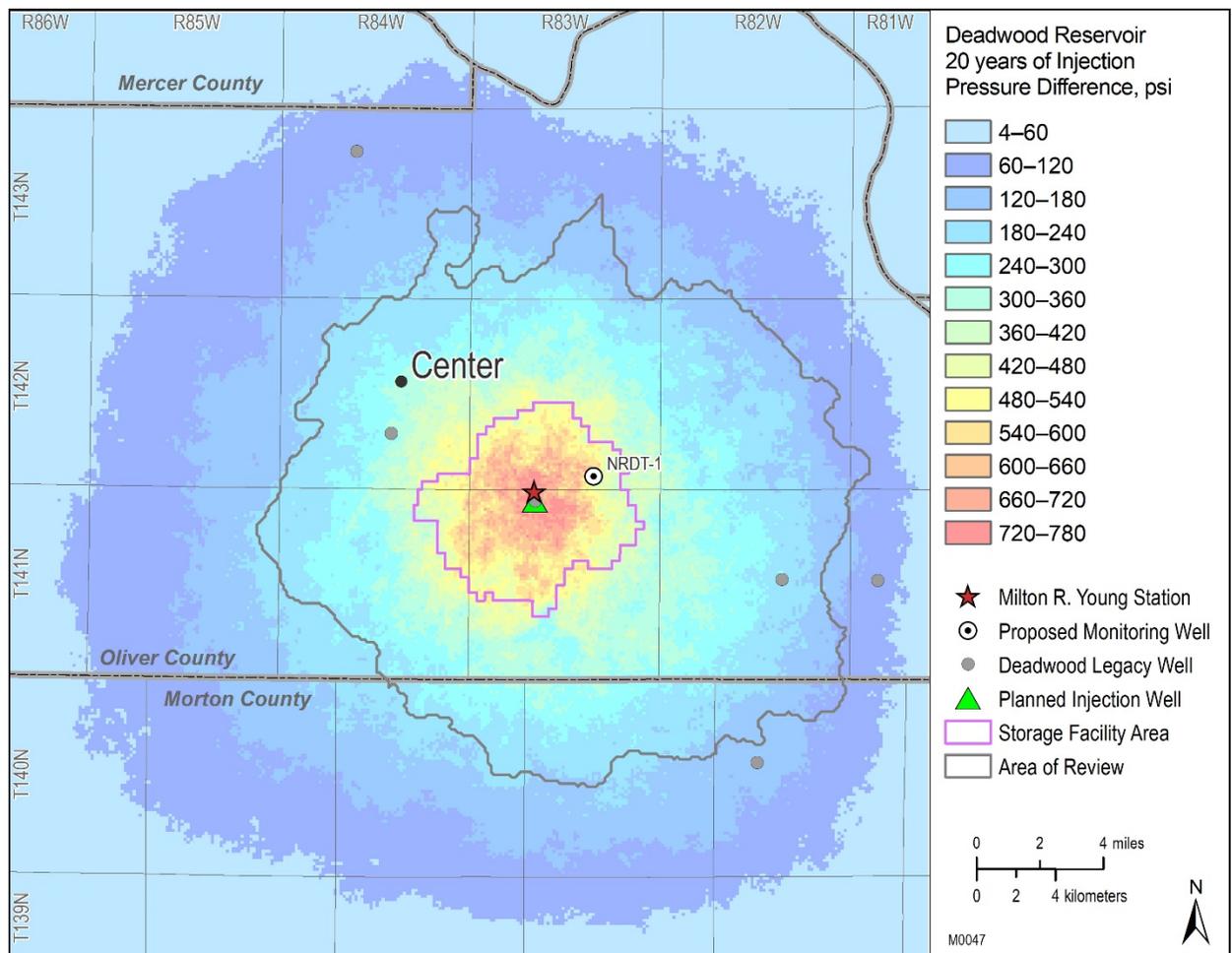


Figure A-16. Average pressure increase within the Deadwood Formation at the end of a simulated 20-year CO₂ injection operation.

Long-term CO₂ migration potential was also investigated through the numerical simulation efforts. The slow lateral migration of the plume is caused by the effects of buoyancy where the free-phase CO₂ injected into the formation rises to the cap rock or lower-permeability layers present in the Black Island and Deadwood Formations and then outward. This process results in a higher concentration of CO₂ at the center which gradually spreads out toward the model edges where the CO₂ saturation is lower. Figures A-17 and A-18 show the gas saturation changes between the end of injection and 20 years postinjection in the cross-sectional view.

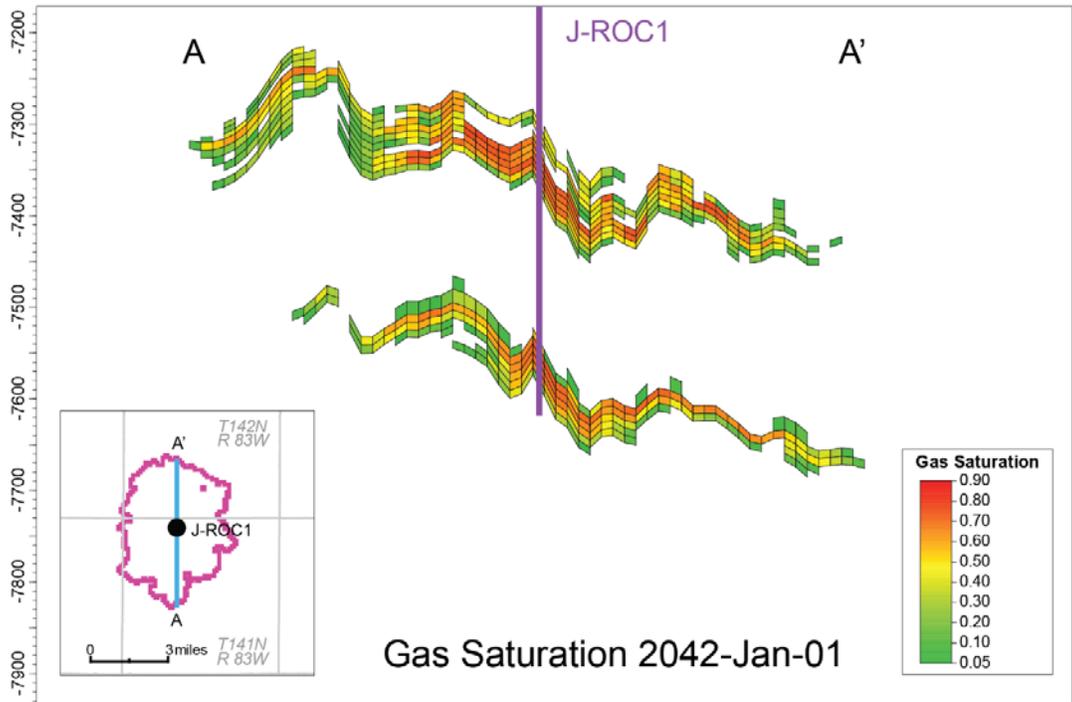


Figure A-17. CO₂ plume boundary and cross section at the end of injection displayed south to north through the J-ROC1 well.

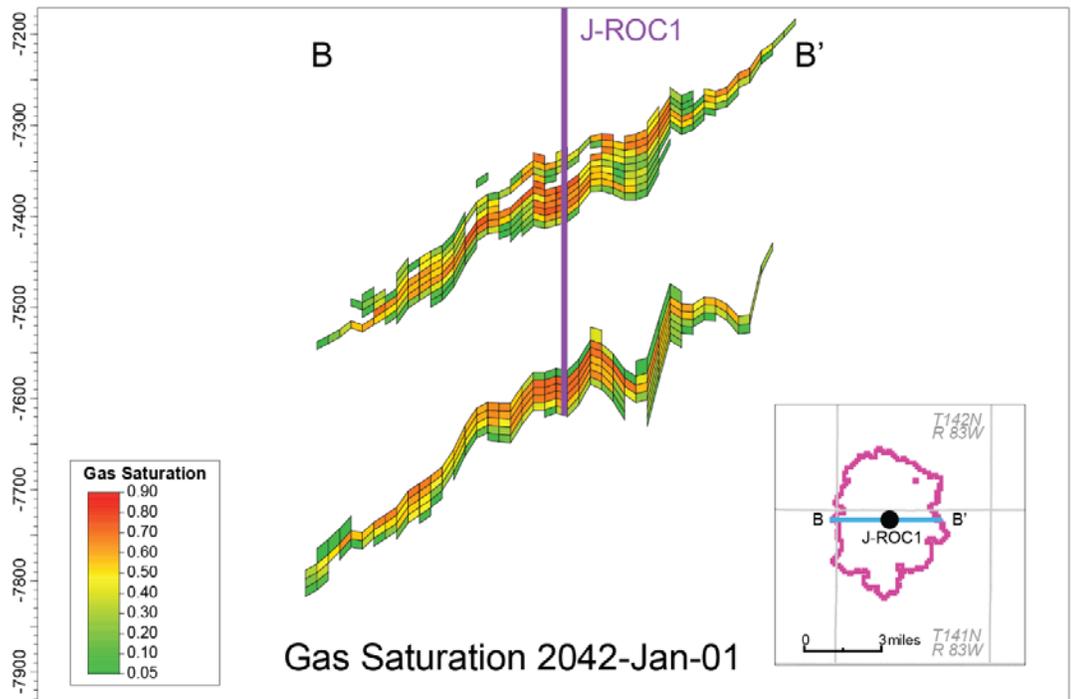


Figure A-18. CO₂ plume boundary and cross section at the end of injection displayed east to west through the J-ROC1 well.

Maximum Surface Injection Pressure

Injectivity in the Deadwood Formation is limited by the WHP and BHP constraints (90% of fracture closure pressure). The initial WHP of 1,700 psi was not sufficient to maximize injectivity while staying significantly below the maximum BHP constraint. An initial feasibility investigation by project partners suggested a step-up to the next compressor capacity (outlet pressure of 2,800 psi) is required to increase injection rate in Deadwood while staying at or below the maximum BHP. A WHP (surface) of 2,800 psi was considered to maximize injection in the simulation model.

The maximum surface pressure was reached in the simulations before the maximum BHP was encountered. At the maximum surface pressure of 2,800 psi, the peak predicted BHP response was observed to be 6,179 psi with an average of 6,139 psi as the BHP remains lower than the maximum BHP of 6,179 psi for most of the injection period (Figure A-19).

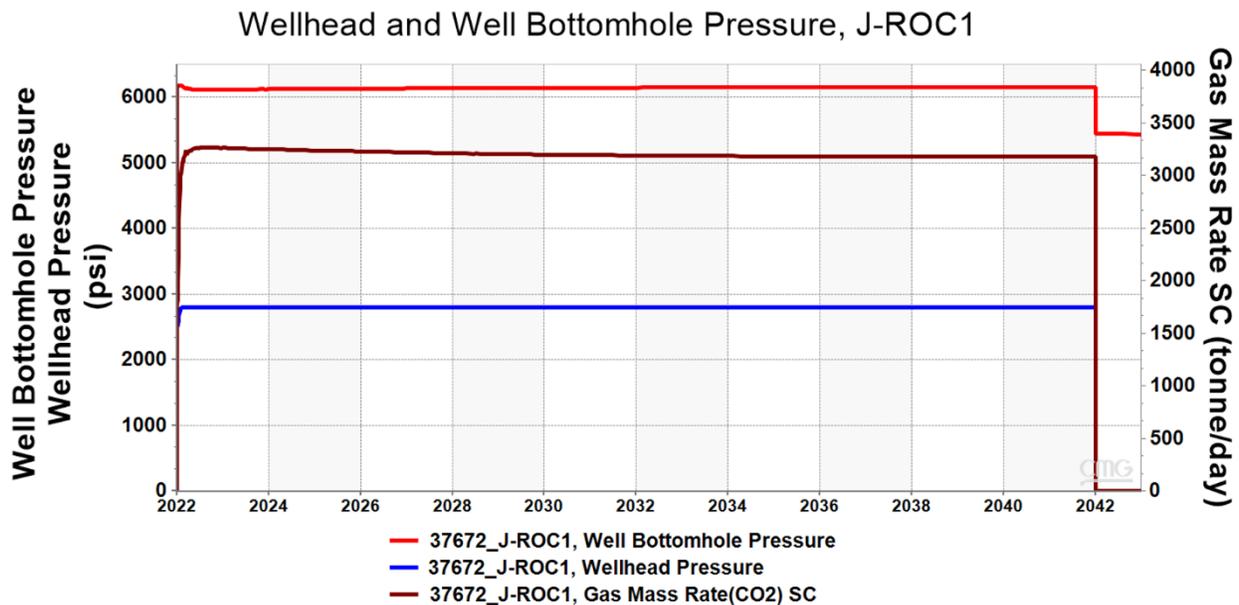


Figure A-19. Maximum pressure and rate response when the well is operated at its maximum safety rating, using 5.5-in. tubing.

DELINEATION OF THE AREA OF REVIEW

The AOR is defined as the region surrounding the geologic storage project where USDWs may be endangered by CO₂ injection activity (North Dakota Administrative Code [NDAC] § 43-05-01-05). The primary endangerment risk is due to the potential for vertical migration of CO₂ and/or formation fluids to a USDW from the storage reservoir. Therefore, the AOR encompasses the region overlying the extent of reservoir fluid pressure increase sufficient to drive formation fluids (e.g., brine) into a USDW, assuming pathways for this migration (e.g., abandoned wells or fractures) are present. The minimum pressure increase in the reservoir that results in a sustained flow of brine upward into an overlying drinking water aquifer is referred to as the “critical threshold pressure increase” and the resultant pressure as the “critical threshold pressure.” The

U.S. Environmental Protection Agency (EPA) guidance for AOR delineation under the Underground Injection Control (UIC) Program for Class VI wells provides several methods for estimating the critical threshold pressure increase and the resulting critical threshold pressure.

EPA (2013) Method 1 (*pressure front based on bringing injection zone and USDW to equivalent hydraulic heads*) is presented as a method for determining whether a storage reservoir is in hydrostatic equilibrium with the lowest USDW (Thornhill and others, 1982). Under Method 1, the increase in pressure (ΔP) that may be sustained in the injection zone (critical pressure threshold) is given by:

$$\Delta P_{i,f} = P_u + \rho_i g \cdot (z_u - z_i) - P_i \quad [\text{Eq. 1}]$$

where P_u is the initial fluid pressure in the USDW, ρ_i is the storage reservoir fluid density (mg/m^3), g is the acceleration due to gravity (m/s^2), z_u is the representative elevation of the USDW (m amsl), z_i is the representative elevation of the injection zone (m amsl), P_i is the initial pressure in the injection zone (Pa), and $\Delta P_{i,f}$ is the critical pressure threshold.

Equation 1 assumes that the hypothetical open borehole is perforated exclusively within the injection zone and USDW. If $\Delta P_{i,f} = 0$, then the reservoir and USDW are in hydrostatic equilibrium; if $\Delta P_{i,f} > 0$, then the reservoir is underpressurized relative to the USDW, and if $\Delta P_{i,f} < 0$, then the reservoir is overpressurized relative to the USDW. In the case of $\Delta P_{i,f} > 0$, the value of $\Delta P_{i,f}$ represents the amount of pressure increase that can be accommodated in the storage reservoir before brine would flow into the lowest USDW.

Critical Threshold Pressure Increase Estimation at J-ROC1

For the purposes of delineating the $\Delta P_{i,f}$ for the Tundra SGS study area, constant fluid densities for the lowermost USDW (the Fox Hills Formation) and the injection zone (the Deadwood Formation) were used. A density of $1,001 \text{ kg/m}^3$ was used to represent the USDW fluids, and a density of $1,177 \text{ kg/m}^3$, which is estimated based on the in situ brine salinity, temperature, and pressure, was used to represent injection zone fluids.

Critical pressure threshold increases were calculated for the proposed storage reservoir at a range of depths across the reservoir using Equation 1, formation depths and thicknesses from J-ROC1, and fluid density values from the nearby J-LOC1 stratigraphic test well (Table A-5). Using this method, the critical threshold pressure increase ($\Delta P_{i,f}$) at the top of the Deadwood Formation at the J-ROC1 well was determined to be 127 psi. Because $\Delta P_{i,f} > 0$, the value of $\Delta P_{i,f}$ represents the amount of pressure increase that can be accommodated in the storage reservoir before brine would flow into the lowest USDW.

Calculations of critical threshold pressure increase were compared to potential pressure increases within the storage facility area that would result from CO_2 injection and the potential lateral extent of the injection fluid as determined by predictive simulations. Table A-5 provides estimates of $\Delta P_{i,f}$ for various depths within the Deadwood Formation at J-ROC1. The same calculations were applied to the geologic model to determine $\Delta P_{i,f}$ for each cell, values from which were then compared against the difference in pressure predicted for each cell in the simulation

Table A-5. EPA Method 1 Critical Threshold Pressure Increase Calculated at the J-ROC1 Wellbore Location

Depth,*		P_i Injection Zone Pressure,	P_u USDW Pressure,	ρ_i Injection Zone Density,	Z_u USDW Base Elevation,	Z_i Reservoir Elevation,	$\Delta P_{i,f}$ Threshold Pressure Increase,	
ft	m	MPa	MPa	kg/m ³	m amsl	m amsl	MPa	psi
9,154	2,790	30.850	3.535	1,177	266	-2174	0.88	127
9,407	2,867	31.703	3.535	1,177	266	-2251	0.90	130
9,660	2,944	32.556	3.535	1,177	266	-2328	0.92	133

* Chosen depths represent the top, middle, and base of the Deadwood Formation at J-ROC1. Ground surface elevation is 609 m above mean sea level.

model at the end of injection (time of greatest increase in pressure since the beginning of simulated injection). A defined area of the simulation model around the injection well displays a 20-year pressure increase (ΔP) that is greater than the calculated $\Delta P_{i,f}$ for the cells in that area. The boundary between where $\Delta P_{i,f} > \Delta P$ and where $\Delta P_{i,f} < \Delta P$ delineates the line of critical threshold pressure increase and must be accounted for—in conjunction with the CO₂ areal extent—when determining AOR.

The storage reservoir is the maximum extent of the injected CO₂ or the maximum extent of the critical pressure, whichever is greater. At Tundra SGS, the line of critical threshold pressure increase plus 1 mile is the AOR, because the maximum extent of critical pressure is larger than the maximum extent of the injected CO₂. As shown in Figure A-20, the AOR is depicted by the gray shaded area, which includes the storage facility area (purple shaded area). Figure A-21 illustrates the land use within the AOR.

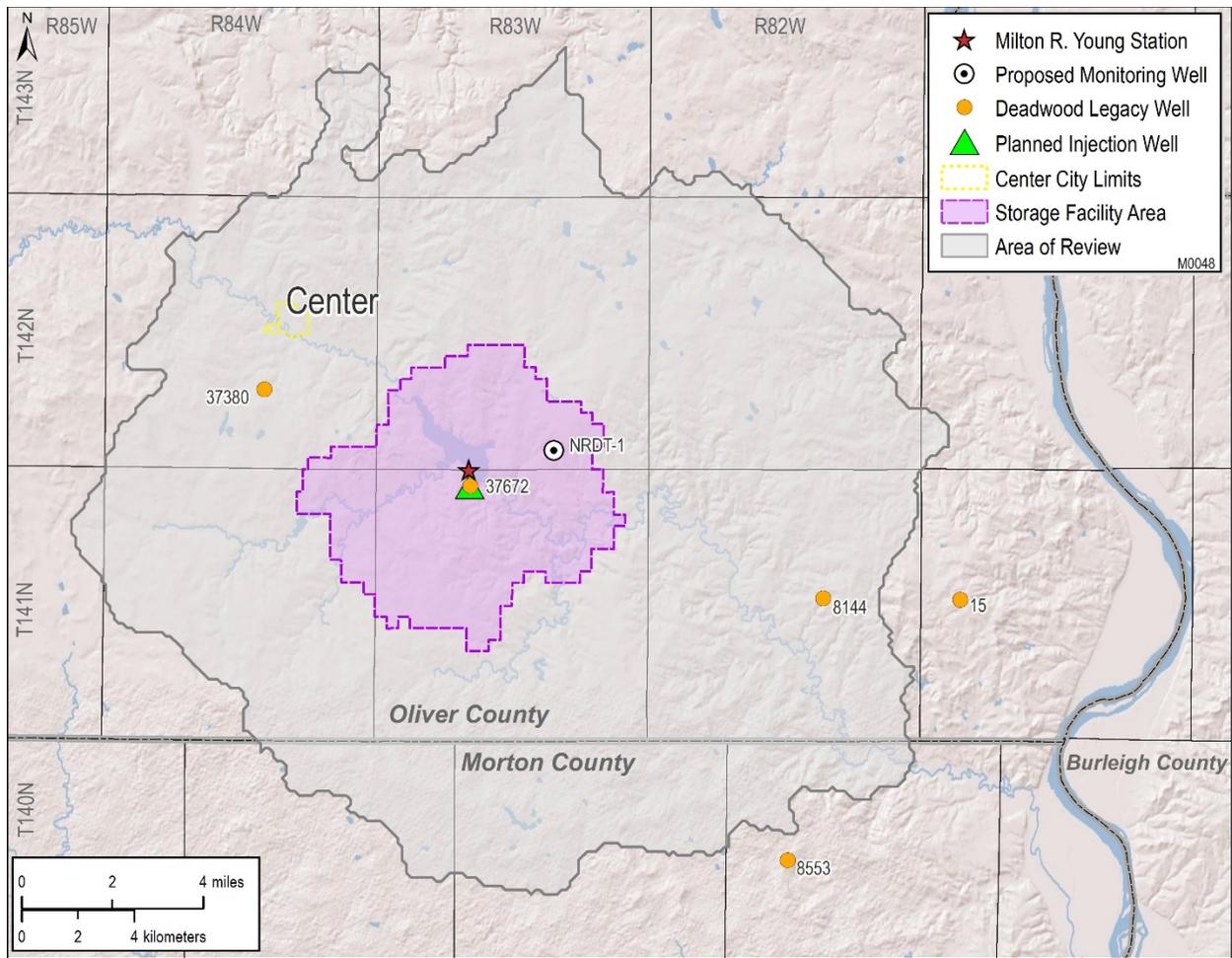


Figure A-20. Final AOR estimations of the Tundra SGS storage facility area in relation to nearby legacy wells. Shown is the storage facility area (purple boundary and shaded area), area of review (gray boundary and shaded area), and Center city limits (dotted yellow boundary). Orange circles represent legacy wells near the storage facility area.

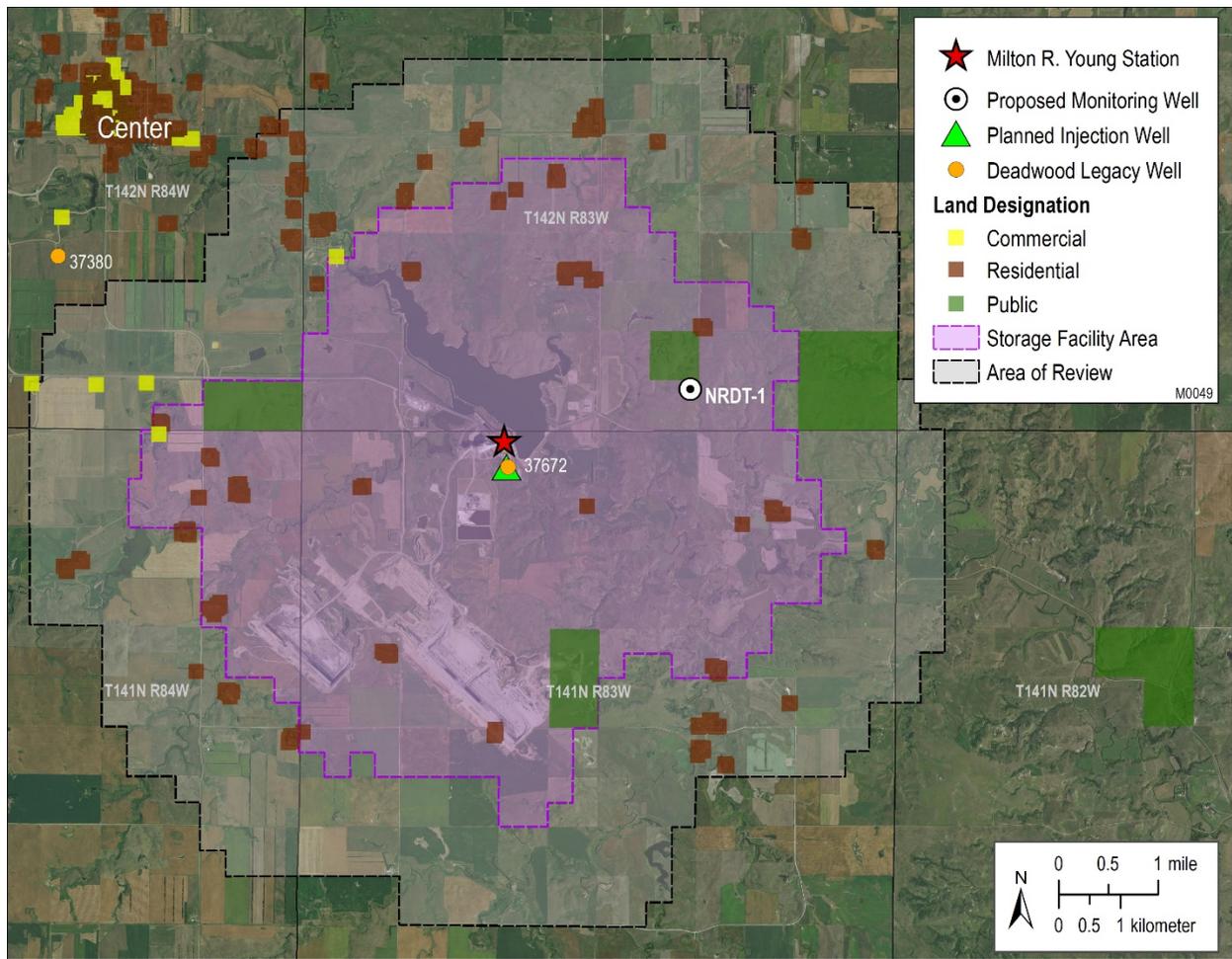


Figure A-21. Land use in and around the AOR of the Tundra SGS storage facility.

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APPENDIX B

**WELL AND WELL FORMATION FLUID-
SAMPLING LABORATORY
ANALYSIS**

ANALYTICAL RESEARCH LAB - Final Results
Set Number: 54654

Request Date: Thursday, June 18, 2020

Fund#: 25089

Due Date: Thursday, July 2, 2020

July 24, 2020
PI: Lonny Jacobson

Set Description: Minnkota JLOC 1 Well-MDT Fluid
 Sampling June 2020

Contact Person: Lonny Jacobson

Sample	Parameter	Result
54654-05	Deadwood 6/13/20	
	Alkalinity, as Bicarbonate (HCO ₃ ⁻)	33.1 mg/L
	Alkalinity, as Carbonate (CO ₃ ⁼)	0 mg/L
	Alkalinity, as Hydroxide (OH ⁻)	0 mg/L
	Alkalinity, Total as CaCO ₃	27.2 mg/L
	Aluminum	< 1000 µg/L
	Antimony	< 5 µg/L
	Arsenic	< 5 µg/L
	Barium	2990 µg/L
	Beryllium	< 4 µg/L
	Bismuth	< 5 µg/L
	Boron	54.0 mg/L
	Bromide	278 mg/L
	Cadmium	< 2 µg/L
	Calcium	8340 mg/L
	Chloride	153000 mg/L
	Chromium	< 40 µg/L
	Cobalt	< 20 µg/L
	Conductivity at 25°C	236000 µS/cm
	Copper	< 200 µg/L
	Dissolved Inorganic Carbon	5.9 mg/L
	Dissolved Organic Carbon	1010 mg/L
	Fluoride	< 5 mg/L
	Iron	25.2 mg/L
	Lead	93 µg/L
	Lithium	41.3 mg/L
	Magnesium	1260 mg/L
	Manganese	3300 µg/L
	Mercury	< 0.3 µg/L
	Molybdenum	< 25 µg/L
	Nickel	< 40 µg/L
	Phosphorus	< 10 mg/L
	Potassium	1800 mg/L
	Selenium	< 5 µg/L
	Silicon	< 10 mg/L

Distribution _____ Date _____

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Set Description: Minnkota JLOC 1 Well-MDT Fluid
Sampling June 2020

Contact Person: Lonny Jacobson

Sample	Parameter	Result
54654-05	Deadwood 6/13/20	
	Silver	< 5 µg/L
	Sodium	91000 mg/L
	Strontium	248 mg/L
	Sulfate	504 mg/L
	Thallium	51 µg/L
	Thorium	< 10 µg/L
	Total Dissolved Solids	256000 mg/L
	Total Inorganic Carbon	12.1 mg/L
	Total Organic Carbon	1060 mg/L
	Uranium	< 5 µg/L
	Vanadium	< 20 µg/L
	Zinc	0.987 mg/L
54654-06	Deadwood 6/13/20 duplicate	
	Alkalinity, as Bicarbonate (HCO ₃ ⁻)	32.5 mg/L
	Alkalinity, as Carbonate (CO ₃ ⁼)	0 mg/L
	Alkalinity, as Hydroxide (OH ⁻)	0 mg/L
	Alkalinity, Total as CaCO ₃	26.7 mg/L
	Aluminum	< 1000 µg/L
	Antimony	< 5 µg/L
	Arsenic	< 5 µg/L
	Barium	2940 µg/L
	Beryllium	< 4 µg/L
	Bismuth	< 5 µg/L
	Boron	52.6 mg/L
	Bromide	283 mg/L
	Cadmium	< 2 µg/L
	Calcium	8350 mg/L
	Chloride	155000 mg/L
	Chromium	< 40 µg/L
	Cobalt	< 20 µg/L
	Conductivity at 25°C	236000 µS/cm
	Copper	< 200 µg/L

Distribution _____ Date _____

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PI: Lonny Jacobson

Set Description: Minnkota JLOC 1 Well-MDT Fluid
Sampling June 2020

Contact Person: Lonny Jacobson

Sample	Parameter	Result
54654-06	Deadwood 6/13/20 duplicate	
	Dissolved Inorganic Carbon	6.0 mg/L
	Dissolved Organic Carbon	1000 mg/L
	Fluoride	< 5 mg/L
	Iron	24.7 mg/L
	Lead	93 µg/L
	Lithium	40.8 mg/L
	Magnesium	1240 mg/L
	Manganese	3230 µg/L
	Mercury	< 0.3 µg/L
	Molybdenum	< 25 µg/L
	Nickel	< 40 µg/L
	Phosphorus	< 10 mg/L
	Potassium	1790 mg/L
	Selenium	< 5 µg/L
	Silicon	< 10 mg/L
	Silver	< 5 µg/L
	Sodium	90300 mg/L
	Strontium	247 mg/L
	Sulfate	510 mg/L
	Thallium	52 µg/L
	Thorium	< 10 µg/L
	Total Dissolved Solids	257000 mg/L
	Total Inorganic Carbon	10 mg/L
	Total Organic Carbon	1060 mg/L
	Uranium	< 5 µg/L
	Vanadium	< 20 µg/L
	Zinc	0.887 mg/L

Distribution _____ Date _____

ANALYTICAL RESEARCH LAB - Final Results
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Request Date: Thursday, June 18, 2020

July 23, 2020
Fund#: 25089

Due Date: Thursday, July 2, 2020

PI: Lonny Jacobson

Set Description: Minnkota JLOC 1 Well-MDT Fluid
 Sampling June 2020 (Total Metals)

Contact Person: Lonny Jacobson

Sample	Parameter	Result
54655-05	Deadwood 6/13/20 (Total Metals)	
	Aluminum	< 1000 µg/L
	Antimony	< 5 µg/L
	Arsenic	< 5 µg/L
	Barium	3150 µg/L
	Beryllium	< 4 µg/L
	Bismuth	< 5 µg/L
	Boron	50.3 mg/L
	Cadmium	< 2 µg/L
	Calcium	8060 mg/L
	Chromium	< 40 µg/L
	Cobalt	< 20 µg/L
	Copper	< 200 µg/L
	Iron	22.5 mg/L
	Lead	92 µg/L
	Lithium	40.8 mg/L
	Magnesium	1200 mg/L
	Manganese	3140 µg/L
	Mercury	< 0.3 µg/L
	Molybdenum	< 25 µg/L
	Nickel	< 40 µg/L
	Phosphorus	< 10 mg/L
	Potassium	1740 mg/L
	Selenium	< 5 µg/L
	Silicon	< 10 mg/L

Note: Results are reported on a dry basis, unless otherwise noted.

Distribution _____ Date _____

ANALYTICAL RESEARCH LAB - Final Results

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Set Number: 54655

Request Date: Thursday, June 18, 2020

Fund#: 25089

Due Date: Thursday, July 2, 2020

PI: Lonny Jacobson

Set Description: Minnkota JLOC 1 Well-MDT Fluid
Sampling June 2020 (Total Metals)

Contact Person: Lonny Jacobson

Sample	Parameter	Result
54655-05	Deadwood 6/13/20 (Total Metals)	
	Silver	< 5 µg/L
	Sodium	88500 mg/L
	Strontium	243 mg/L
	Thallium	51 µg/L
	Thorium	< 10 µg/L
	Uranium	< 5 µg/L
	Vanadium	< 20 µg/L
	Zinc	0.946 mg/L
54655-06	Deadwood 6/13/20 duplicate (Total Metals)	
	Aluminum	< 1000 µg/L
	Antimony	< 5 µg/L
	Arsenic	< 5 µg/L
	Barium	3200 µg/L
	Beryllium	< 4 µg/L
	Bismuth	< 5 µg/L
	Boron	49.2 mg/L
	Cadmium	< 2 µg/L
	Calcium	8210 mg/L
	Chromium	< 40 µg/L
	Cobalt	< 20 µg/L
	Copper	< 200 µg/L
	Iron	22.8 mg/L
	Lead	96 µg/L
	Lithium	41.8 mg/L
	Magnesium	1210 mg/L
	Manganese	3120 µg/L
	Mercury	< 0.3 µg/L
	Molybdenum	< 25 µg/L
	Nickel	< 40 µg/L
	Phosphorus	< 10 mg/L
	Potassium	1770 mg/L
	Selenium	< 5 µg/L

Note: Results are reported on a dry basis, unless otherwise noted.

Distribution _____ Date _____

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Request Date: Thursday, June 18, 2020

Fund#: 25089

Due Date: Thursday, July 2, 2020

PI: Lonny Jacobson

Set Description: Minnkota JLOC 1 Well-MDT Fluid
Sampling June 2020 (Total Metals)

Contact Person: Lonny Jacobson

Sample	Parameter	Result
54655-06	Deadwood 6/13/20 duplicate (Total Metals)	
	Silicon	< 10 mg/L
	Silver	< 5 µg/L
	Sodium	88700 mg/L
	Strontium	241 mg/L
	Thallium	52 µg/L
	Thorium	< 10 µg/L
	Uranium	< 5 µg/L
	Vanadium	< 20 µg/L
	Zinc	1.15 mg/L

Note: Results are reported on a dry basis, unless otherwise noted.

Distribution _____ Date _____

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Page: 1 of 2

Jennifer Altendorf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 30 Jun 20
Lab Number: 20-W1767
Work Order #: 82-1477
Account #: 007048
Date Sampled: 13 Jun 20 10:00
Date Received: 15 Jun 20 8:00
Sampled By: MVTL Field Services
PO #: 203046

Sample Description: Deadwood

Temp at Receipt: 4.2C

	As Received Result		Method RL	Method Reference	Date Analyzed	Analyst
Metal Digestion				EPA 200.2	15 Jun 20	JD
pH	* 6.0	units	N/A	SM4500 H+ B	15 Jun 20 17:00	HT
Conductivity (EC)	201590	umhos/cm	N/A	SM2510-B	15 Jun 20 17:00	HT
pH - Field	5.46	units	NA	SM 4500 H+ B	13 Jun 20 10:00	JSM
Temperature - Field	21.2	Degrees C	NA	SM 2550B	13 Jun 20 10:00	JSM
Total Alkalinity	72	mg/l CaCO3	20	SM2320-B	15 Jun 20 17:00	HT
Phenolphthalein Alk	< 20	mg/l CaCO3	20	SM2320-B	15 Jun 20 17:00	HT
Bicarbonate	72	mg/l CaCO3	20	SM2320-B	15 Jun 20 17:00	HT
Carbonate	< 20	mg/l CaCO3	20	SM2320-B	15 Jun 20 17:00	HT
Hydroxide	< 20	mg/l CaCO3	20	SM2320-B	15 Jun 20 17:00	HT
Conductivity - Field	216320	umhos/cm	1	EPA 120.1	13 Jun 20 10:00	JSM
Total Organic Carbon	14.0	mg/l	0.5	SM5310-C	23 Jun 20 17:34	NAS
Sulfate	491	mg/l	5.00	ASTM D516-11	17 Jun 20 11:38	EV
Chloride	17500	mg/l	1.0	SM4500-Cl-E	17 Jun 20 9:50	EV
Nitrate-Nitrite as N	< 0.1	mg/l	0.10	EPA 353.2	18 Jun 20 8:37	EV
Ammonia-Nitrogen as N	60.4	mg/l	0.20	EPA 350.1	16 Jun 20 11:40	EV
Mercury - Dissolved	< 0.0002	mg/l	0.0002	EPA 245.1	18 Jun 20 12:37	MDE
Total Dissolved Solids	256000	mg/l	10	I1750-85	17 Jun 20 15:53	HT
Calcium - Total	8610	mg/l	1.0	6010D	16 Jun 20 13:25	MDE
Magnesium - Total	1210	mg/l	1.0	6010D	16 Jun 20 13:25	MDE
Sodium - Total	87000	mg/l	1.0	6010D	16 Jun 20 13:25	MDE
Potassium - Total	2020	mg/l	1.0	6010D	16 Jun 20 13:25	MDE
Iron - Total	22.2	mg/l	0.10	6010D	24 Jun 20 11:07	MDE
Manganese - Total	2.85	mg/l	0.05	6010D	24 Jun 20 11:07	MDE
Barium - Dissolved	< 5 @	mg/l	0.10	6010D	23 Jun 20 12:02	SZ

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

@ = Due to sample matrix # = Due to concentration of other analytes
! = Due to sample quantity + = Due to internal standard response

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Jennifer Altendorf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 30 Jun 20
Lab Number: 20-W1767
Work Order #: 82-1477
Account #: 007048
Date Sampled: 13 Jun 20 10:00
Date Received: 15 Jun 20 8:00
Sampled By: MVTL Field Services
PO #: 203046

Sample Description: Deadwood

Temp at Receipt: 4.2C

	As Received Result		Method RL	Method Reference	Date Analyzed	Analyst
Copper - Dissolved	< 2.5 @	mg/l	0.05	6010D	23 Jun 20 12:02	SZ
Molybdenum - Dissolved	< 5 @	mg/l	0.10	6010D	23 Jun 20 12:02	SZ
Strontium - Dissolved	246	mg/l	0.10	6010D	23 Jun 20 12:02	SZ
Arsenic - Dissolved	< 0.04 @	mg/l	0.0020	6020B	15 Jun 20 16:05	MDE
Cadmium - Dissolved	0.0247	mg/l	0.0005	6020B	16 Jun 20 12:21	MDE
Chromium - Dissolved	< 0.04 @	mg/l	0.0020	6020B	15 Jun 20 16:05	MDE
Lead - Dissolved	0.0836	mg/l	0.0005	6020B	15 Jun 20 16:05	MDE
Selenium - Dissolved	< 0.1 @	mg/l	0.0050	6020B	15 Jun 20 16:05	MDE
Silver - Dissolved	< 0.02 @	mg/l	0.0005	6020B	16 Jun 20 12:21	MDE

* Holding time exceeded

Approved by:

Claudette K. Carroll

Claudette K. Carroll, Laboratory Manager, Bismarck, ND

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APPENDIX C

NEAR-SURFACE MONITORING PARAMETERS AND BASELINE DATA

C1. Near-Surface Monitoring: Groundwater and Soil Gas

Near-surface sampling discussed herein comprises 1) sampling of shallow groundwater aquifers (underground sources of drinking water [USDW]) and 2) sampling of soil gas in the shallow vadose zone. Sampling and chemical analysis of these zones provide concentrations of chemical constituents, including carbon dioxide (CO₂), which are focused on detecting movement of the CO₂ out of the reservoir. Ultimately, these monitoring efforts will provide data to confirm that near-surface environments are not adversely impacted by CO₂ injection and storage operations.

C1-1. Groundwater Analysis Protocol

Baseline Groundwater Wells

Two laboratories will be used to analyze the water samples: 1) Minnesota Valley Testing Laboratories, Inc. (MVTL) for general parameters, anions, cations, metals (dissolved and total), and nonmetals (Tables C-1 and C-2) and 2) Isotech Laboratories, Inc., for isotopic signatures (Table C-3).

Table C-1. Measurements of General Parameters for Groundwater Samples

Parameter	Method
Alkalinity	SM ¹ 2320B
Bromide	EPA ² 300.0
Chloride	EPA 300.0
Dissolved Inorganic Carbon (DIC)	EPA 9060
Dissolved Mercury	EPA 245.2
Dissolved Metals ³ (31 metals)	EPA 200.7/200.8
Dissolved Organic Carbon (DOC)	SM 5310B
Fluoride	EPA 300.0
Sulfate	EPA 300.0
Sulfide	SM 4500-S ²⁻ F
TDS	SM 2540C
Total Inorganic Carbon (TIC)	EPA 9060
Total Mercury	EPA 7470A
Total Metals ² (31 metals)	EPA 6010B/6020
Total Organic Carbon (TOC)	SM 5310B

¹Standard method; American Public Health Association (2017).

²U.S. Environmental Protection Agency.

³See Table C-2 for entire sampling list of total and dissolved metals.

Table C-2. Total and Dissolved Metals and Cation Measurements for Groundwater Samples

Major Cations	Minor and Trace Metals		
Calcium	Aluminum	Copper	Selenium
Magnesium	Antimony	Iron	Silicon
Potassium	Arsenic	Lead	Silver
Sodium	Barium	Lithium	Strontium
	Beryllium	Manganese	Thallium
	Bismuth	Mercury	Thorium
	Boron	Molybdenum	Uranium
	Cadmium	Nickel	Vanadium
	Chromium	Phosphorus	Zinc
	Cobalt		

Table C-3. Isotope Measurements for Groundwater Samples

Isotope	Units
$\delta^2\text{H H}_2\text{O}$	‰ ^a
$\delta^{18}\text{O H}_2\text{O}$	‰
Tritium	TU ^b
$\delta^{13}\text{C DIC}$	‰
$^{14}\text{C DIC}$	pMC ^c

^a One tenth of a percent (0.1%).

^b Tritium unit.

^c Percent modern carbon.

C1-2. Soil Gas-Sampling and Analysis Protocol

Vadose zone soil gas monitoring directly measures the characteristics of the air space between soil components and is an indirect indicator of both chemical and biological processes occurring in and below a sampling horizon.

Soil Gas Profile Station Locations

Fixed soil gas profile stations will be installed for the sampling of soil gas adjacent to the well pads at the injection and monitoring wellsites J-ROC1 and MLR-1 prior to the initiation of CO₂ injection. A schematic of these soil gas profile stations is shown in Figure C-1. Each soil gas profile station contains three isolated gas-sampling screens from which individual soil gas samples will be obtained.

The procedures for the acquisition of the soil gas samples from the soil gas profile stations are as follows: sampling will not proceed until the screens have been purged and the composition of the soil gas has been determined to be stable. Following industry standards for landfill gas analysis, an on-site analysis of the soil gas will be conducted (RAE handheld meter) and a laboratory sample collected for the parameters identified in Table C-4. In addition, a sample will be collected and sent to Isotech Laboratories, Inc. (Champaign, Illinois) for isotopic analyses (see Table C-5).

Table C-4. Soil Gas Analytes Identified with Field and Laboratory Instruments

RAE Handheld Meter	Agilent Technologies RGA-GC 7890A
CO ₂	CO ₂
O ₂	O ₂
H ₂ S	N ₂
Total VOCs*	He
	H ₂
	CH ₄
	CO
	C ₂ H ₆
	C ₂ H ₄
	C ₃ H ₈
	C ₂ H ₈
	(CH ₃) ₂ CH-CH ₃ C ₄ H ₁₀
	HC≡CH
	H ₂ C=CH-C ₂ H ₅
	H ₃ C-CH=CH-CH ₃
	(CH ₃) ₂ C=CH ₂
	H ₃ C-CH=CH-CH ₃
	(CH ₃) ₂ CH-CH ₂ -CH ₃
	C ₅ H ₁₂
	H ₂ C=CH-CH=CH ₂

* Volatile organic compounds.

Table C-5. Isotope Measurements of Soil Gas Samples

Isotope	Units
δ ¹³ C of CO ₂	‰
δD	‰
¹⁴ C in CO ₂	pMC
¹⁴ C in CH ₄	pMC

C2. Near-Surface Water Well Verification

The North Dakota State Water Commission (NDSWC) drilling records provided the starting point for selecting baseline characterization and monitoring wells. Nearly 600 drilling records were included in the project area. Key well characteristics for further investigations were 1) potential as a drinking water source (i.e., labeled domestic, domestic/stock, and municipal) and 2) aquifer. Based on the database drilling records, most of the wells in the area draw from the Tongue River aquifer. As a result, wells labeled for purposes other than drinking water (e.g., stock, industrial, unknown) were included in the initial selection for the Fox Hills and Upper Hell Creek and Cannonball and Ludlow aquifers. The 42 well records fitting these criteria underwent review to verify their status (e.g., do they still exist? can they be sampled?). The verification process is ongoing. It is anticipated that up to 19 viable wells may be selected to characterize the baseline groundwater quality of the USDWs in the project area.

C3. Laboratory Analyses of Baseline Data

Existing monitoring well data have been compiled as one element of the baseline characterization effort. These data represent long-term regulatory monitoring associated with the BNI coal mine and MRYS power plant operations. Additionally, baseline sampling has begun in an existing observation well in the deepest USDW for in the USGS-managed Fox Hills observation well (NDSWC Well No. 3558) east of Center, North Dakota. The first of four anticipated baseline sampling events occurred on January 12, 2021.

Attached to this appendix are laboratory results from these three sources. They include the following:

1. 3 years of analyses from annual sampling of six mine land wells monitored by BNI
2. 3 years of analyses from five ash disposal pond wells monitored by MRYS.
3. Laboratory results from one sample of Fox Hills observation well 2558.

APPENDIX C-1

**BNI COAL MONITORING WELL ANALYSES
FOR BASELINE DATA**



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Page: 1 of 1

Derrick Placek
BNI Coal
2360 35th Ave SW
Center ND 58530

Report Date: 8 Aug 18
Lab Number: 18-W2083
Work Order #: 82-1752
Account #: 003022
Date Sampled: 17 Jul 18 12:47
Date Received: 18 Jul 18 8:00
Sampled By: MVTL Field Services

Project Name: BNI Coal-Center
Sample Description: 322A
Sample Site: Annual Groundwater Sampling
Event and Year: 2018

Temp at Receipt: 3.1C ROI

	As Received Result		Method RL	Method Reference	Date Analyzed	Analyst
Metal Digestion				EPA 200.2	18 Jul 18	SVS
pH	* 6.4	units	N/A	SM4500 H+ B	18 Jul 18 17:00	SVS
Conductivity (EC)	801	umhos/cm	N/A	SM2510-B	18 Jul 18 17:00	SVS
pH - Field	6.19	units	NA	SM 4500 H+ B	17 Jul 18 12:47	DJN
Temperature - Field	11.2	Degrees C	NA	SM 2550B	17 Jul 18 12:47	DJN
Total Alkalinity	118	mg/l CaCO3	20	SM2320-B	19 Jul 18 17:00	SVS
Phenolphthalein Alk	< 20	mg/l CaCO3	20	SM2320-B	19 Jul 18 17:00	SVS
Bicarbonate	118	mg/l CaCO3	20	SM2320-B	19 Jul 18 17:00	SVS
Carbonate	< 20	mg/l CaCO3	20	SM2320-B	19 Jul 18 17:00	SVS
Hydroxide	< 20	mg/l CaCO3	20	SM2320-B	19 Jul 18 17:00	SVS
Conductivity - Field	870	umhos/cm	1	EPA 120.1	17 Jul 18 12:47	DJN
Tot Dis Solids(Summation)	525	mg/l	12.5	SM1030-F	2 Aug 18 13:22	Calculated
Bicarb as HCO3	144	mg/l HCO3	NA	SM2320-B	19 Jul 18 17:00	Calculated
Total Hardness as CaCO3	415	mg/l	NA	SM2340-B	30 Jul 18 12:35	Calculated
Cation Summation	9.84	meq/L	NA	SM1030-F	30 Jul 18 12:35	Calculated
Anion Summation	8.25	meq/L	NA	SM1030-F	2 Aug 18 13:22	Calculated
Percent Error	8.79	%	NA	SM1030-F	2 Aug 18 13:22	Calculated
Sodium Adsorption Ratio	0.70		NA	USDA 20b	30 Jul 18 12:35	Calculated
Fluoride	< 0.1	mg/l	0.10	SM4500-F-C	18 Jul 18 17:00	SVS
Sulfate	277	mg/l	5.00	ASTM D516-07	20 Jul 18 14:32	EMS
Chloride	3.6	mg/l	1.0	SM4500-Cl-E	26 Jul 18 12:11	EV
Nitrate-Nitrite as N	0.25	mg/l	0.10	EPA 353.2	2 Aug 18 13:22	EV
Calcium - Total	96.2	mg/l	1.0	6010D	30 Jul 18 12:35	BT
Magnesium - Total	42.4	mg/l	1.0	6010D	30 Jul 18 12:35	BT
Sodium - Total	32.8	mg/l	1.0	6010D	30 Jul 18 12:35	BT
Potassium - Total	2.1	mg/l	1.0	6010D	30 Jul 18 12:35	BT
Iron - Dissolved	1.55	mg/l	0.10	6010D	27 Jul 18 11:25	BT
Manganese - Dissolved	0.28	mg/l	0.05	6010D	27 Jul 18 11:25	BT

* Holding time exceeded

Approved by:

Claudette K Carroll

8 Aug 18

Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit

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Derrick Placek
BNI Coal
2360 35th Ave SW
Center ND 58530

Report Date: 27 Aug 19
Lab Number: 19-W2683
Work Order #: 82-1966
Account #: 003022
Date Sampled: 29 Jul 19 14:40
Date Received: 30 Jul 19 15:00
Sampled By: MVTL Field Services

Sample Description: 322A

Temp at Receipt: 0.7C

Event and Year: 2019

	As Received Result		Method RL	Method Reference	Date Analyzed	Analyst
Metal Digestion				EPA 200.2	30 Jul 19	MDE
pH	* 6.6	units	N/A	SM4500 H+ B	31 Jul 19 18:00	SVS
Conductivity (EC)	980	umhos/cm	N/A	SM2510-B	31 Jul 19 18:00	SVS
pH - Field	6.21	units	NA	SM 4500 H+ B	29 Jul 19 14:40	JSM
Temperature - Field	14.4	Degrees C	NA	SM 2550B	29 Jul 19 14:40	JSM
Total Alkalinity	124	mg/l CaCO3	20	SM2320-B	31 Jul 19 18:00	SVS
Phenolphthalein Alk	< 20	mg/l CaCO3	20	SM2320-B	31 Jul 19 18:00	SVS
Bicarbonate	124	mg/l CaCO3	20	SM2320-B	31 Jul 19 18:00	SVS
Carbonate	< 20	mg/l CaCO3	20	SM2320-B	31 Jul 19 18:00	SVS
Hydroxide	< 20	mg/l CaCO3	20	SM2320-B	31 Jul 19 18:00	SVS
Conductivity - Field	1193	umhos/cm	1	EPA 120.1	29 Jul 19 14:40	JSM
Tot Dis Solids(Summation)	726	mg/l	12.5	SM1030-F	22 Aug 19 8:28	Calculated
Bicarb as HCO3	151	mg/l HCO3	NA	SM2320-B	31 Jul 19 18:00	Calculated
Total Hardness as CaCO3	561	mg/l	NA	SM2340-B	14 Aug 19 10:17	Calculated
Cation Summation	13.0	meq/L	NA	SM1030-F	16 Aug 19 18:14	Calculated
Anion Summation	11.3	meq/L	NA	SM1030-F	22 Aug 19 8:28	Calculated
Percent Error	6.94	%	NA	SM1030-F	22 Aug 19 8:28	Calculated
Sodium Adsorption Ratio	0.72		NA	USDA 20b	14 Aug 19 10:17	Calculated
Fluoride	0.10	mg/l	0.10	SM4500-F-C	31 Jul 19 18:00	SVS
Sulfate	419	mg/l	5.00	ASTM D516-07	22 Aug 19 8:28	EV
Chloride	4.0	mg/l	1.0	SM4500-C1-E	31 Jul 19 10:28	EV
Nitrate-Nitrite as N	0.17	mg/l	0.10	EPA 353.2	31 Jul 19 14:48	EMS
Calcium - Total	130	mg/l	1.0	6010D	14 Aug 19 10:17	SZ
Magnesium - Total	57.4	mg/l	1.0	6010D	14 Aug 19 10:17	SZ
Sodium - Total	39.2	mg/l	1.0	6010D	14 Aug 19 10:17	SZ
Potassium - Total	2.0	mg/l	1.0	6010D	14 Aug 19 10:17	SZ
Iron - Dissolved	1.16	mg/l	0.10	6010D	16 Aug 19 18:14	SZ
Manganese - Dissolved	0.23	mg/l	0.05	6010D	16 Aug 19 18:14	SZ

* Holding time exceeded

Approved by:

Claudette K. Carroll

29 Aug 19

Claudette K. Carroll, Laboratory Manager, Bismarck, ND

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Derrick Placek
BNI Coal
2360 35th Ave SW
Center ND 58530

Report Date: 4 Aug 20
Lab Number: 20-W2663
Work Order #: 82-2008
Account #: 003022
Date Sampled: 27 Jul 20 12:50
Date Received: 27 Jul 20 16:49
Sampled By: MVTL Field Services

Project Name: BNI Coal - Center
Sample Description: 322A
Sample Site: Annual Groundwater Sampling
Event and Year: 2020

Temp at Receipt: 4.3C ROI

	As Received Result		Method RL	Method Reference	Date Analyzed	Analyst
Metal Digestion				EPA 200.2	28 Jul 20	HT
pH	* 6.6	units	N/A	SM4500 H+ B	28 Jul 20 17:00	HT
Conductivity (EC)	832	umhos/cm	N/A	SM2510-B	28 Jul 20 17:00	HT
pH - Field	6.14	units	NA	SM 4500 H+ B	27 Jul 20 12:50	DJN
Temperature - Field	10.0	Degrees C	NA	SM 2550B	27 Jul 20 12:50	DJN
Total Alkalinity	165	mg/l CaCO3	20	SM2320-B	28 Jul 20 17:00	HT
Phenolphthalein Alk	< 20	mg/l CaCO3	20	SM2320-B	28 Jul 20 17:00	HT
Bicarbonate	165	mg/l CaCO3	20	SM2320-B	28 Jul 20 17:00	HT
Carbonate	< 20	mg/l CaCO3	20	SM2320-B	28 Jul 20 17:00	HT
Hydroxide	< 20	mg/l CaCO3	20	SM2320-B	28 Jul 20 17:00	HT
Conductivity - Field	863	umhos/cm	1	EPA 120.1	27 Jul 20 12:50	DJN
Tot Dis Solids(Summation)	532	mg/l	12.5	SM1030-F	30 Jul 20 11:00	Calculated
Bicarb as HCO3	201	mg/l HCO3	NA	SM2320-B	28 Jul 20 17:00	Calculated
Total Hardness as CaCO3	423	mg/l	NA	SM2340-B	29 Jul 20 11:25	Calculated
Cation Summation	9.96	meq/L	NA	SM1030-F	3 Aug 20 13:38	Calculated
Anion Summation	8.68	meq/L	NA	SM1030-F	30 Jul 20 11:00	Calculated
Percent Error	6.87	%	NA	SM1030-F	3 Aug 20 13:38	Calculated
Sodium Adsorption Ratio	0.69		NA	USDA 20b	29 Jul 20 11:25	Calculated
Fluoride	< 0.1	mg/l	0.10	SM4500-F-C	28 Jul 20 17:00	HT
Sulfate	253	mg/l	5.00	ASTM D516-11	29 Jul 20 12:30	EV
Chloride	3.5	mg/l	1.0	SM4500-Cl-E	29 Jul 20 9:46	EV
Nitrate-Nitrite as N	0.13	mg/l	0.10	EPA 353.2	30 Jul 20 11:00	EV
Calcium - Total	99.3	mg/l	1.0	6010D	29 Jul 20 11:25	MDE
Magnesium - Total	42.6	mg/l	1.0	6010D	29 Jul 20 11:25	MDE
Sodium - Total	32.4	mg/l	1.0	6010D	29 Jul 20 11:25	MDE
Potassium - Total	1.9	mg/l	1.0	6010D	29 Jul 20 11:25	MDE
Iron - Dissolved	0.88	mg/l	0.10	6010D	3 Aug 20 13:38	MDE
Manganese - Dissolved	0.14	mg/l	0.05	6010D	3 Aug 20 13:38	MDE

* Holding time exceeded

CC

Approved by:

Claudette K. Carroll

4 Aug 20 20

Claudette K. Carroll, Laboratory Manager, Bismarck, ND

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 2360 35th Ave SW
 Center ND 58530

Report Date: 8 Aug 18
 Lab Number: 18-W2170
 Work Order #: 82-1784
 Account #: 003022
 Date Sampled: 19 Jul 18 9:16
 Date Received: 19 Jul 18 15:08
 Sampled By: MVTL Field Services

Project Name: BNI Coal-Center
 Sample Description: 324

Temp at Receipt: 7.2C ROI

Event and Year: 2018

	As Received Result		Method RL	Method Reference	Date Analyzed	Analyst
Metal Digestion				EPA 200.2	19 Jul 18	SVS
pH	* 7.8	units	N/A	SM4500 H+ B	23 Jul 18 17:00	SVS
Conductivity (EC)	649	umhos/cm	N/A	SM2510-B	23 Jul 18 17:00	SVS
pH - Field	7.47	units	NA	SM 4500 H+ B	19 Jul 18 9:16	DJN
Temperature - Field	9.28	Degrees C	NA	SM 2550B	19 Jul 18 9:16	DJN
Total Alkalinity	188	mg/l CaCO3	20	SM2320-B	23 Jul 18 17:00	SVS
Phenolphthalein Alk	< 20	mg/l CaCO3	20	SM2320-B	23 Jul 18 17:00	SVS
Bicarbonate	188	mg/l CaCO3	20	SM2320-B	23 Jul 18 17:00	SVS
Carbonate	< 20	mg/l CaCO3	20	SM2320-B	23 Jul 18 17:00	SVS
Hydroxide	< 20	mg/l CaCO3	20	SM2320-B	23 Jul 18 17:00	SVS
Conductivity - Field	632	umhos/cm	1	EPA 120.1	19 Jul 18 9:16	DJN
Tot Dis Solids (Summation)	360	mg/l	12.5	SM1030-F	7 Aug 18 16:30	Calculated
Bicarb as HCO3	229	mg/l HCO3	NA	SM2320-B	23 Jul 18 17:00	Calculated
Total Hardness as CaCO3	92.1	mg/l	NA	SM2340-B	30 Jul 18 14:35	Calculated
Cation Summation	6.53	meq/L	NA	SM1030-F	30 Jul 18 14:35	Calculated
Anion Summation	6.09	meq/L	NA	SM1030-F	7 Aug 18 16:30	Calculated
Percent Error	3.47	%	NA	SM1030-F	7 Aug 18 16:30	Calculated
Sodium Adsorption Ratio	4.81		NA	USDA 20b	30 Jul 18 14:35	Calculated
Fluoride	0.20	mg/l	0.10	SM4500-F-C	23 Jul 18 17:00	SVS
Sulfate	103	mg/l	5.00	ASTM D516-07	20 Jul 18 16:05	EMS
Chloride	4.0	mg/l	1.0	SM4500-Cl-E	26 Jul 18 14:56	EV
Nitrate-Nitrite as N	1.06	mg/l	0.10	EPA 353.2	7 Aug 18 16:30	EMS
Calcium - Total	20.4	mg/l	1.0	6010D	30 Jul 18 14:35	BT
Magnesium - Total	10.0	mg/l	1.0	6010D	30 Jul 18 14:35	BT
Sodium - Total	106	mg/l	1.0	6010D	30 Jul 18 14:35	BT
Potassium - Total	3.1	mg/l	1.0	6010D	30 Jul 18 14:35	BT
Iron - Dissolved	< 0.1	mg/l	0.10	6010D	30 Jul 18 11:55	SZ
Manganese - Dissolved	< 0.05	mg/l	0.05	6010D	30 Jul 18 11:55	SZ

* Holding time exceeded

Approved by:

Claudette K Carroll

CC
8 Aug 18

Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

@ = Due to sample matrix
 ! = Due to sample quantity

= Due to concentration of other analytes
 + = Due to internal standard response

CERTIFICATION: ND # ND-00016



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Derrick Placek
BNI Coal
2360 35th Ave SW
Center ND 58530

Report Date: 7 Aug 20
Lab Number: 20-W2552
Work Order #: 82-1952
Account #: 003022
Date Sampled: 21 Jul 20 11:51
Date Received: 22 Jul 20 8:00
Sampled By: MVTL Field Services

Sample Description: 324

Temp at Receipt: 5.5C ROI

	As Received Result		Method RL	Method Reference	Date Analyzed	Analyst
Metal Digestion				EPA 200.2	22 Jul 20	HT
pH	* 7.8	units	N/A	SM4500 H+ B	22 Jul 20 17:00	HT
Conductivity (EC)	1182	umhos/cm	N/A	SM2510-B	22 Jul 20 17:00	HT
pH - Field	7.54	units	NA	SM 4500 H+ B	21 Jul 20 11:51	DJN
Temperature - Field	9.58	Degrees C	NA	SM 2550B	21 Jul 20 11:51	DJN
Total Alkalinity	369	mg/l CaCO3	20	SM2320-B	22 Jul 20 17:00	HT
Phenolphthalein Alk	< 20	mg/l CaCO3	20	SM2320-B	22 Jul 20 17:00	HT
Bicarbonate	369	mg/l CaCO3	20	SM2320-B	22 Jul 20 17:00	HT
Carbonate	< 20	mg/l CaCO3	20	SM2320-B	22 Jul 20 17:00	HT
Hydroxide	< 20	mg/l CaCO3	20	SM2320-B	22 Jul 20 17:00	HT
Conductivity - Field	1174	umhos/cm	1	EPA 120.1	21 Jul 20 11:51	DJN
Tot Dis Solids(Summation)	745	mg/l	12.5	SM1030-F	5 Aug 20 8:19	Calculated
Bicarb as HCO3	450	mg/l HCO3	NA	SM2320-B	22 Jul 20 17:00	Calculated
Total Hardness as CaCO3	173	mg/l	NA	SM2340-B	31 Jul 20 9:21	Calculated
Cation Summation	12.4	meq/L	NA	SM1030-F	31 Jul 20 9:21	Calculated
Anion Summation	12.8	meq/L	NA	SM1030-F	5 Aug 20 8:19	Calculated
Percent Error	-1.82	%	NA	SM1030-F	5 Aug 20 8:19	Calculated
Sodium Adsorption Ratio	6.68		NA	USDA 20b	31 Jul 20 9:21	Calculated
Fluoride	0.29	mg/l	0.10	SM4500-F-C	22 Jul 20 17:00	HT
Sulfate	256	mg/l	5.00	ASTM D516-11	5 Aug 20 8:19	EV
Chloride	4.0	mg/l	1.0	SM4500-Cl-E	28 Jul 20 15:16	EV
Nitrate-Nitrite as N	< 0.1	mg/l	0.10	EPA 353.2	23 Jul 20 11:53	EMS
Calcium - Total	37.7	mg/l	1.0	6010D	31 Jul 20 9:21	MDE
Magnesium - Total	19.2	mg/l	1.0	6010D	31 Jul 20 9:21	MDE
Sodium - Total	202	mg/l	1.0	6010D	31 Jul 20 9:21	MDE
Potassium - Total	4.3	mg/l	1.0	6010D	31 Jul 20 9:21	MDE
Iron - Dissolved	0.16	mg/l	0.10	6010D	27 Jul 20 11:42	MDE
Manganese - Dissolved	< 0.05	mg/l	0.05	6010D	27 Jul 20 11:42	MDE

* Holding time exceeded

cc

Approved by: Claudette K. Carroll 7 Aug 2020

Claudette K. Carroll, Laboratory Manager, Bismarck, ND

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! = Due to sample quantity + = Due to internal standard response

CERTIFICATION: ND # ND-00016



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Page: 1 of 1

Derrick Placek
BNI Coal
2360 35th Ave SW
Center ND 58530

Report Date: 4 Aug 20
Lab Number: 20-W2657
Work Order #: 82-2008
Account #: 003022
Date Sampled: 27 Jul 20 13:43
Date Received: 27 Jul 20 16:49
Sampled By: MVTL Field Services

Project Name: BNI Coal - Center
Sample Description: 363
Sample Site: Annual Groundwater Sampling
Event and Year: 2020

Temp at Receipt: 4.3C ROI

	As Received Result		Method RL	Method Reference	Date Analyzed	Analyst
Metal Digestion				EPA 200.2	28 Jul 20	HT
pH	* 8.2	units	N/A	SM4500 H+ B	28 Jul 20 17:00	HT
Conductivity (EC)	2454	umhos/cm	N/A	SM2510-B	28 Jul 20 17:00	HT
pH - Field	7.94	units	NA	SM 4500 H+ B	27 Jul 20 13:43	DJN
Temperature - Field	11.0	Degrees C	NA	SM 2550B	27 Jul 20 13:43	DJN
Total Alkalinity	1200	mg/l CaCO3	20	SM2320-B	28 Jul 20 17:00	HT
Phenolphthalein Alk	< 20	mg/l CaCO3	20	SM2320-B	28 Jul 20 17:00	HT
Bicarbonate	1200	mg/l CaCO3	20	SM2320-B	28 Jul 20 17:00	HT
Carbonate	< 20	mg/l CaCO3	20	SM2320-B	28 Jul 20 17:00	HT
Hydroxide	< 20	mg/l CaCO3	20	SM2320-B	28 Jul 20 17:00	HT
Conductivity - Field	2508	umhos/cm	1	EPA 120.1	27 Jul 20 13:43	DJN
Tot Dis Solids (Summation)	1550	mg/l	12.5	SM1030-F	30 Jul 20 10:43	Calculated
Bicarb as HCO3	1460	mg/l HCO3	NA	SM2320-B	28 Jul 20 17:00	Calculated
Total Hardness as CaCO3	53.6	mg/l	NA	SM2340-B	29 Jul 20 10:25	Calculated
Cation Summation	27.2	meq/L	NA	SM1030-F	3 Aug 20 12:38	Calculated
Anion Summation	28.4	meq/L	NA	SM1030-F	30 Jul 20 10:43	Calculated
Percent Error	-2.16	%	NA	SM1030-F	3 Aug 20 12:38	Calculated
Sodium Adsorption Ratio	35.4		NA	USDA 20b	29 Jul 20 10:25	Calculated
Fluoride	0.90	mg/l	0.10	SM4500-F-C	28 Jul 20 17:00	HT
Sulfate	195	mg/l	5.00	ASTM D516-11	29 Jul 20 12:30	EV
Chloride	12.1	mg/l	1.0	SM4500-Cl-E	29 Jul 20 9:46	EV
Nitrate-Nitrite as N	< 0.1	mg/l	0.10	EPA 353.2	30 Jul 20 10:43	EV
Calcium - Total	10.6	mg/l	1.0	6010D	29 Jul 20 10:25	MDE
Magnesium - Total	6.6	mg/l	1.0	6010D	29 Jul 20 10:25	MDE
Sodium - Total	596	mg/l	1.0	6010D	29 Jul 20 10:25	MDE
Potassium - Total	6.8	mg/l	1.0	6010D	29 Jul 20 10:25	MDE
Iron - Dissolved	0.82	mg/l	0.10	6010D	3 Aug 20 12:38	MDE
Manganese - Dissolved	0.08	mg/l	0.05	6010D	3 Aug 20 12:38	MDE

* Holding time exceeded

CC

Approved by: Claudette K. Carroll 4 Aug 2020

Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit

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CERTIFICATION: ND # ND-00016



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Derrick Placek
BNI Coal
2360 35th Ave SW
Center ND 58530

Report Date: 2 Aug 18
Lab Number: 18-W2077
Work Order #: 82-1751
Account #: 003022
Date Sampled: 17 Jul 18 10:58
Date Received: 18 Jul 18 8:00
Sampled By: MVTl Field Services

Project Name: BNI Coal-Center
Sample Description: C1-1
Sample Site: Annual Groundwater Sampling
Event and Year: 2018

Temp at Receipt: 1.7C ROI

Table with columns: As Received Result, Method RL, Method Reference, Date Analyzed, Analyst. Rows include various chemical and physical parameters like pH, Conductivity, Total Alkalinity, etc.

* Holding time exceeded

Approved by: Claudette K. Carroll 7 Aug 18
Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit

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Page: 1 of 1

Derrick Placek
BNI Coal
2360 35th Ave SW
Center ND 58530

Report Date: 4 Aug 20
Lab Number: 20-W2669
Work Order #: 82-2018
Account #: 003022
Date Sampled: 28 Jul 20 10:08
Date Received: 28 Jul 20 14:25
Sampled By: MVTL Field Services

Project Name: BNI Coal - Center
Sample Description: C1-1
Sample Site: Annual Groundwater Sampling
Event and Year: 2020

Temp at Receipt: 2.2C ROI

	As Received Result		Method RL	Method Reference	Date Analyzed	Analyst
Metal Digestion				EPA 200.2	28 Jul 20	HT
pH	* 8.4	units	N/A	SM4500 H+ B	28 Jul 20 18:00	HT
Conductivity (EC)	1168	umhos/cm	N/A	SM2510-B	28 Jul 20 18:00	HT
pH - Field	8.31	units	NA	SM 4500 H+ B	28 Jul 20 10:08	DJN
Temperature - Field	11.6	Degrees F	1	SM 2550B	28 Jul 20 10:08	DJN
Total Alkalinity	526	mg/l CaCO3	20	SM2320-B	28 Jul 20 18:00	HT
Phenolphthalein Alk	< 20	mg/l CaCO3	20	SM2320-B	28 Jul 20 18:00	HT
Bicarbonate	522	mg/l CaCO3	20	SM2320-B	28 Jul 20 18:00	HT
Carbonate	< 20	mg/l CaCO3	20	SM2320-B	28 Jul 20 18:00	HT
Hydroxide	< 20	mg/l CaCO3	20	SM2320-B	28 Jul 20 18:00	HT
Conductivity - Field	1143	umhos/cm	1	EPA 120.1	28 Jul 20 10:08	DJN
Tot Dis Solids(Summation)	698	mg/l	12.5	SM1030-F	30 Jul 20 11:00	Calculated
Bicarb as HCO3	637	mg/l HCO3	NA	SM2320-B	28 Jul 20 18:00	Calculated
Total Hardness as CaCO3	26.7	mg/l	NA	SM2340-B	29 Jul 20 11:25	Calculated
Cation Summation	12.3	meq/L	NA	SM1030-F	3 Aug 20 13:38	Calculated
Anion Summation	12.7	meq/L	NA	SM1030-F	30 Jul 20 11:00	Calculated
Percent Error	-1.45	%	NA	SM1030-F	3 Aug 20 13:38	Calculated
Sodium Adsorption Ratio	22.5		NA	USDA 20b	29 Jul 20 11:25	Calculated
Fluoride	< 0.1	mg/l	0.10	SM4500-F-C	28 Jul 20 18:00	HT
Sulfate	99.7	mg/l	5.00	ASTM D516-11	29 Jul 20 13:56	EV
Chloride	2.6	mg/l	1.0	SM4500-Cl-E	29 Jul 20 9:46	EV
Nitrate-Nitrite as N	< 0.1	mg/l	0.10	EPA 353.2	30 Jul 20 11:00	EV
Calcium - Total	5.9	mg/l	1.0	6010D	29 Jul 20 11:25	MDE
Magnesium - Total	2.9	mg/l	1.0	6010D	29 Jul 20 11:25	MDE
Sodium - Total	267	mg/l	1.0	6010D	29 Jul 20 11:25	MDE
Potassium - Total	3.9	mg/l	1.0	6010D	29 Jul 20 11:25	MDE
Iron - Dissolved	1.71	mg/l	0.10	6010D	3 Aug 20 13:38	MDE
Manganese - Dissolved	< 0.05	mg/l	0.05	6010D	3 Aug 20 13:38	MDE

* Holding time exceeded

Approved by: Claudette K Carroll *CC*
4 Aug 2020

Claudette K. Carroll, Laboratory Manager, Bismarck, ND

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CERTIFICATION: ND # ND-00016



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Derrick Placek
 BNI Coal
 2360 35th Ave SW
 Center ND 58530

Report Date: 10 Aug 18
 Lab Number: 18-W2160
 Work Order #: 82-1776
 Account #: 003022
 Date Sampled: 18 Jul 18 10:00
 Date Received: 19 Jul 18 8:00
 Sampled By: MVTL Field Services

Project Name: BNI Coal-Center
 Sample Description: C7-1

Temp at Receipt: 4.2C ROI

	As Received Result		Method RL	Method Reference	Date Analyzed	Analyst
Metal Digestion				EPA 200.2	19 Jul 18	SVS
pH	* 8.5	units	N/A	SM4500 H+ B	19 Jul 18 18:00	SVS
Conductivity (EC)	2105	umhos/cm	N/A	SM2510-B	19 Jul 18 18:00	SVS
pH - Field	8.02	units	NA	SM 4500 H+ B	18 Jul 18 10:00	DJN
Temperature - Field	11.5	Degrees C	NA	SM 2550B	18 Jul 18 10:00	DJN
Total Alkalinity	985	mg/l CaCO3	20	SM2320-B	19 Jul 18 18:00	SVS
Phenolphthalein Alk	< 20	mg/l CaCO3	20	SM2320-B	19 Jul 18 18:00	SVS
Bicarbonate	957	mg/l CaCO3	20	SM2320-B	19 Jul 18 18:00	SVS
Carbonate	28	mg/l CaCO3	20	SM2320-B	19 Jul 18 18:00	SVS
Hydroxide	< 20	mg/l CaCO3	20	SM2320-B	19 Jul 18 18:00	SVS
Conductivity - Field	2091	umhos/cm	1	EPA 120.1	18 Jul 18 10:00	DJN
Tot Dis Solids(Summation)	1410	mg/l	12.5	SM1030-F	7 Aug 18 16:11	Calculated
Bicarb as HCO3	1170	mg/l HCO3	NA	SM2320-B	19 Jul 18 18:00	Calculated
Total Hardness as CaCO3	58.5	mg/l	NA	SM2340-B	30 Jul 18 14:35	Calculated
Cation Summation	25.0	meq/L	NA	SM1030-F	30 Jul 18 14:35	Calculated
Anion Summation	25.1	meq/L	NA	SM1030-F	7 Aug 18 16:11	Calculated
Percent Error	-0.31	%	NA	SM1030-F	7 Aug 18 16:11	Calculated
Sodium Adsorption Ratio	30.7		NA	USDA 20b	30 Jul 18 14:35	Calculated
Fluoride	1.07	mg/l	0.10	SM4500-F-C	19 Jul 18 18:00	SVS
Sulfate	234	mg/l	5.00	ASTM D516-07	20 Jul 18 15:44	EMS
Chloride	20.2	mg/l	1.0	SM4500-Cl-E	26 Jul 18 14:56	EV
Nitrate-Nitrite as N	< 0.1	mg/l	0.10	EPA 353.2	7 Aug 18 16:11	EMS
Calcium - Total	10.4	mg/l	1.0	6010D	30 Jul 18 14:35	BT
Magnesium - Total	7.9	mg/l	1.0	6010D	30 Jul 18 14:35	BT
Sodium - Total	540	mg/l	1.0	6010D	30 Jul 18 14:35	BT
Potassium - Total	7.1	mg/l	1.0	6010D	30 Jul 18 14:35	BT
Iron - Dissolved	4.02	mg/l	0.10	6010D	30 Jul 18 10:55	SZ
Manganese - Dissolved	0.09	mg/l	0.05	6010D	30 Jul 18 10:55	SZ

* Holding time exceeded

Approved by:

Claudette K. Carroll

*CL
10 Aug 18*

Claudette K. Carroll, Laboratory Manager, Bismarck, ND

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 + = Due to internal standard response

CERTIFICATION: ND # ND-00016



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Derrick Placek
 BNI Coal
 2360 35th Ave SW
 Center ND 58530

Report Date: 27 Aug 19
 Lab Number: 19-W2712
 Work Order #: 82-1976
 Account #: 003022
 Date Sampled: 30 Jul 19 9:07
 Date Received: 31 Jul 19 8:00
 Sampled By: MVTL Field Services

Sample Description: C7-1

Temp at Receipt: 7.3C ROI

Event and Year: 2019

	As Received Result		Method RL	Method Reference	Date Analyzed	Analyst
Metal Digestion				EPA 200.2	31 Jul 19	MDE
pH	* 8.4	units	N/A	SM4500 H+ B	1 Aug 19 17:00	SVS
Conductivity (EC)	2098	umhos/cm	N/A	SM2510-B	1 Aug 19 17:00	SVS
pH - Field	7.97	units	NA	SM 4500 H+ B	30 Jul 19 9:07	DJN
Temperature - Field	9.19	Degrees C	NA	SM 2550B	30 Jul 19 9:07	DJN
Total Alkalinity	1050	mg/l CaCO3	20	SM2320-B	1 Aug 19 17:00	SVS
Phenolphthalein Alk	< 20	mg/l CaCO3	20	SM2320-B	1 Aug 19 17:00	SVS
Bicarbonate	1030	mg/l CaCO3	20	SM2320-B	1 Aug 19 17:00	SVS
Carbonate	20	mg/l CaCO3	20	SM2320-B	1 Aug 19 17:00	SVS
Hydroxide	< 20	mg/l CaCO3	20	SM2320-B	1 Aug 19 17:00	SVS
Conductivity - Field	2084	umhos/cm	1	EPA 120.1	30 Jul 19 9:07	DJN
Tot Dis Solids(Summation)	1480	mg/l	12.5	SM1030-F	14 Aug 19 13:17	Calculated
Bicarb as HCO3	1260	mg/l HCO3	NA	SM2320-B	1 Aug 19 17:00	Calculated
Total Hardness as CaCO3	55.5	mg/l	NA	SM2340-B	14 Aug 19 13:17	Calculated
Cation Summation	25.3	meq/L	NA	SM1030-F	26 Aug 19 10:38	Calculated
Anion Summation	27.1	meq/L	NA	SM1030-F	2 Aug 19 15:11	Calculated
Percent Error	-3.33	%	NA	SM1030-F	26 Aug 19 10:38	Calculated
Sodium Adsorption Ratio	31.9		NA	USDA 20b	14 Aug 19 13:17	Calculated
Fluoride	1.12	mg/l	0.10	SM4500-F-C	1 Aug 19 17:00	SVS
Sulfate	252	mg/l	5.00	ASTM D516-07	2 Aug 19 15:11	EMS
Chloride	28.8	mg/l	1.0	SM4500-Cl-E	31 Jul 19 11:15	EV
Nitrate-Nitrite as N	< 2 @	mg/l	0.10	EPA 353.2	31 Jul 19 15:56	EMS
Calcium - Total	9.7	mg/l	1.0	6010D	14 Aug 19 13:17	SZ
Magnesium - Total	7.6	mg/l	1.0	6010D	14 Aug 19 13:17	SZ
Sodium - Total	547	mg/l	1.0	6010D	14 Aug 19 13:17	SZ
Potassium - Total	5.3	mg/l	1.0	6010D	14 Aug 19 13:17	SZ
Iron - Dissolved	7.52	mg/l	0.10	6010D	26 Aug 19 10:38	SZ
Manganese - Dissolved	0.17	mg/l	0.05	6010D	26 Aug 19 10:38	SZ

* Holding time exceeded

Approved by:

Claudette K. Carroll

*cc
28 Aug 19*

Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

@ = Due to sample matrix
 ! = Due to sample quantity

= Due to concentration of other analytes
 + = Due to internal standard response

CERTIFICATION: ND # ND-00016



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Page: 1 of 1

Derrick Placek
BNI Coal
2360 35th Ave SW
Center ND 58530

Report Date: 7 Aug 20
Lab Number: 20-W2541
Work Order #: 82-1952
Account #: 003022
Date Sampled: 21 Jul 20 8:23
Date Received: 22 Jul 20 8:00
Sampled By: MVTL Field Services

Sample Description: C7-1

Temp at Receipt: 5.5C ROI

	As Received Result		Method RL	Method Reference	Date Analyzed	Analyst
Metal Digestion				EPA 200.2	22 Jul 20	HT
pH	* 8.2	units	N/A	SM4500 H+ B	22 Jul 20 17:00	HT
Conductivity (EC)	2096	umhos/cm	N/A	SM2510-B	22 Jul 20 17:00	HT
pH - Field	8.20	units	NA	SM 4500 H+ B	21 Jul 20 8:23	DJN
Temperature - Field	10.9	Degrees C	NA	SM 2550B	21 Jul 20 8:23	DJN
Total Alkalinity	1120	mg/l CaCO3	20	SM2320-B	22 Jul 20 17:00	HT
Phenolphthalein Alk	< 20	mg/l CaCO3	20	SM2320-B	22 Jul 20 17:00	HT
Bicarbonate	1120	mg/l CaCO3	20	SM2320-B	22 Jul 20 17:00	HT
Carbonate	< 20	mg/l CaCO3	20	SM2320-B	22 Jul 20 17:00	HT
Hydroxide	< 20	mg/l CaCO3	20	SM2320-B	22 Jul 20 17:00	HT
Conductivity - Field	2239	umhos/cm	1	EPA 120.1	21 Jul 20 8:23	DJN
Tot Dis Solids(Summation)	1490	mg/l	12.5	SM1030-F	27 Jul 20 11:17	Calculated
Bicarb as HCO3	1370	mg/l HCO3	NA	SM2320-B	22 Jul 20 17:00	Calculated
Total Hardness as CaCO3	54.5	mg/l	NA	SM2340-B	24 Jul 20 13:45	Calculated
Cation Summation	24.3	meq/L	NA	SM1030-F	27 Jul 20 10:42	Calculated
Anion Summation	28.3	meq/L	NA	SM1030-F	27 Jul 20 11:17	Calculated
Percent Error	-7.64	%	NA	SM1030-F	27 Jul 20 11:17	Calculated
Sodium Adsorption Ratio	30.6		NA	USDA 20b	24 Jul 20 13:45	Calculated
Fluoride	1.06	mg/l	0.10	SM4500-F-C	22 Jul 20 17:00	HT
Sulfate	258	mg/l	5.00	ASTM D516-11	22 Jul 20 15:38	EMS
Chloride	19.0	mg/l	1.0	SM4500-Cl-E	27 Jul 20 11:17	EV
Nitrate-Nitrite as N	< 0.1	mg/l	0.10	EPA 353.2	23 Jul 20 11:33	EMS
Calcium - Total	9.8	mg/l	1.0	6010D	24 Jul 20 13:45	MDE
Magnesium - Total	7.3	mg/l	1.0	6010D	24 Jul 20 13:45	MDE
Sodium - Total	519	mg/l	1.0	6010D	24 Jul 20 13:45	MDE
Potassium - Total	5.0	mg/l	1.0	6010D	24 Jul 20 13:45	MDE
Iron - Dissolved	13.5	mg/l	0.10	6010D	27 Jul 20 10:42	MDE
Manganese - Dissolved	0.35	mg/l	0.05	6010D	27 Jul 20 10:42	MDE

* Holding time exceeded

Approved by:

Claudette K. Carroll

CC
7 Aug 2020

Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:
@ = Due to sample matrix # = Due to concentration of other analytes
! = Due to sample quantity + = Due to internal standard response

CERTIFICATION: ND # ND-00016



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Page: 1 of 1

Derrick Placek
 BNI Coal
 2360 35th Ave SW
 Center ND 58530

Report Date: 27 Aug 19
 Lab Number: 19-W2715
 Work Order #: 82-1976
 Account #: 003022
 Date Sampled: 30 Jul 19 9:55
 Date Received: 31 Jul 19 8:00
 Sampled By: MVTL Field Services

Sample Description: C9-1

Temp at Receipt: 7.3C ROI

Event and Year: 2019

	As Received Result		Method RL	Method Reference	Date Analyzed	Analyst
Metal Digestion				EPA 200.2	31 Jul 19	MDE
pH	* 8.3	units	N/A	SM4500 H+ B	1 Aug 19 17:00	SVS
Conductivity (EC)	2032	umhos/cm	N/A	SM2510-B	1 Aug 19 17:00	SVS
pH - Field	7.75	units	NA	SM 4500 H+ B	30 Jul 19 9:55	DJN
Temperature - Field	11.3	Degrees C	NA	SM 2550B	30 Jul 19 9:55	DJN
Total Alkalinity	1030	mg/l CaCO3	20	SM2320-B	1 Aug 19 17:00	SVS
Phenolphthalein Alk	< 20	mg/l CaCO3	20	SM2320-B	1 Aug 19 17:00	SVS
Bicarbonate	1014	mg/l CaCO3	20	SM2320-B	1 Aug 19 17:00	SVS
Carbonate	< 20	mg/l CaCO3	20	SM2320-B	1 Aug 19 17:00	SVS
Hydroxide	< 20	mg/l CaCO3	20	SM2320-B	1 Aug 19 17:00	SVS
Conductivity - Field	1991	umhos/cm	1	EPA 120.1	30 Jul 19 9:55	DJN
Tot Dis Solids(Summation)	1610	mg/l	12.5	SM1030-F	14 Aug 19 13:17	Calculated
Bicarb as HCO3	1240	mg/l HCO3	NA	SM2320-B	1 Aug 19 17:00	Calculated
Total Hardness as CaCO3	148	mg/l	NA	SM2340-B	14 Aug 19 13:17	Calculated
Cation Summation	27.3	meq/L	NA	SM1030-F	26 Aug 19 11:38	Calculated
Anion Summation	29.6	meq/L	NA	SM1030-F	2 Aug 19 15:38	Calculated
Percent Error	-4.11	%	NA	SM1030-F	26 Aug 19 11:38	Calculated
Sodium Adsorption Ratio	18.7		NA	USDA 20b	14 Aug 19 13:17	Calculated
Fluoride	1.19	mg/l	0.10	SM4500-F-C	1 Aug 19 17:00	SVS
Sulfate	350	mg/l	5.00	ASTM D516-07	2 Aug 19 15:38	EMS
Chloride	61.6	mg/l	1.0	SM4500-Cl-E	31 Jul 19 11:15	EV
Nitrate-Nitrite as N	< 10 @	mg/l	0.10	EPA 353.2	31 Jul 19 15:56	EMS
Calcium - Total	28.3	mg/l	1.0	6010D	14 Aug 19 13:17	SZ
Magnesium - Total	18.8	mg/l	1.0	6010D	14 Aug 19 13:17	SZ
Sodium - Total	523	mg/l	1.0	6010D	14 Aug 19 13:17	SZ
Potassium - Total	8.4	mg/l	1.0	6010D	14 Aug 19 13:17	SZ
Iron - Dissolved	37.3	mg/l	0.10	6010D	26 Aug 19 11:38	SZ
Manganese - Dissolved	0.77	mg/l	0.05	6010D	26 Aug 19 11:38	SZ

* Holding time exceeded

CC
 28 Aug 19

Approved by: Claudette K. Carroll

Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:
 @ = Due to sample matrix # = Due to concentration of other analytes
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CERTIFICATION: ND # ND-00016



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Page: 1 of 1

Derrick Placek
BNI Coal
2360 35th Ave SW
Center ND 58530

Report Date: 7 Aug 20
Lab Number: 20-W2543
Work Order #: 82-1952
Account #: 003022
Date Sampled: 21 Jul 20 8:59
Date Received: 22 Jul 20 8:00
Sampled By: MVTL Field Services

Sample Description: C9-1

Temp at Receipt: 5.5C ROI

	As Received Result		Method RL	Method Reference	Date Analyzed	Analyst
Metal Digestion				EPA 200.2	22 Jul 20	HT
pH	* 8.3	units	N/A	SM4500 H+ B	22 Jul 20 17:00	HT
Conductivity (EC)	2012	umhos/cm	N/A	SM2510-B	22 Jul 20 17:00	HT
pH - Field	8.20	units	NA	SM 4500 H+ B	21 Jul 20 8:59	DJN
Temperature - Field	9.91	Degrees C	NA	SM 2550B	21 Jul 20 8:59	DJN
Total Alkalinity	1080	mg/l CaCO3	20	SM2320-B	22 Jul 20 17:00	HT
Phenolphthalein Alk	< 20	mg/l CaCO3	20	SM2320-B	22 Jul 20 17:00	HT
Bicarbonate	1080	mg/l CaCO3	20	SM2320-B	22 Jul 20 17:00	HT
Carbonate	< 20	mg/l CaCO3	20	SM2320-B	22 Jul 20 17:00	HT
Hydroxide	< 20	mg/l CaCO3	20	SM2320-B	22 Jul 20 17:00	HT
Conductivity - Field	2012	umhos/cm	1	EPA 120.1	21 Jul 20 8:59	DJN
Tot Dis Solids(Summation)	1430	mg/l	12.5	SM1030-F	5 Aug 20 8:19	Calculated
Bicarb as HCO3	1320	mg/l HCO3	NA	SM2320-B	22 Jul 20 17:00	Calculated
Total Hardness as CaCO3	92.4	mg/l	NA	SM2340-B	24 Jul 20 13:45	Calculated
Cation Summation	24.2	meq/L	NA	SM1030-F	27 Jul 20 10:42	Calculated
Anion Summation	26.9	meq/L	NA	SM1030-F	5 Aug 20 8:19	Calculated
Percent Error	-5.27	%	NA	SM1030-F	5 Aug 20 8:19	Calculated
Sodium Adsorption Ratio	23.0		NA	USDA 20b	24 Jul 20 13:45	Calculated
Fluoride	1.14	mg/l	0.10	SM4500-F-C	22 Jul 20 17:00	HT
Sulfate	210	mg/l	5.00	ASTM D516-11	5 Aug 20 8:19	EV
Chloride	32.4	mg/l	1.0	SM4500-Cl-E	27 Jul 20 11:17	EV
Nitrate-Nitrite as N	< 0.1	mg/l	0.10	EPA 353.2	23 Jul 20 11:53	EMS
Calcium - Total	17.2	mg/l	1.0	6010D	24 Jul 20 13:45	MDE
Magnesium - Total	12.0	mg/l	1.0	6010D	24 Jul 20 13:45	MDE
Sodium - Total	508	mg/l	1.0	6010D	24 Jul 20 13:45	MDE
Potassium - Total	7.0	mg/l	1.0	6010D	24 Jul 20 13:45	MDE
Iron - Dissolved	1.96	mg/l	0.10	6010D	27 Jul 20 10:42	MDE
Manganese - Dissolved	0.06	mg/l	0.05	6010D	27 Jul 20 10:42	MDE

* Holding time exceeded

Approved by: Claudette K. Carroll ^{cc} 7 Aug 2020
Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:
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CERTIFICATION: ND # ND-00016

APPENDIX C-2

**MILTON R. YOUNG POWER STATION
MONITORING WELL ANALYSES
FOR BASELINE DATA**



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CERTIFICATE of ANALYSIS - STATE

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 21 Sep 20
Lab Number: 20-W3411
Work Order #: 82-2509
Account #: 007048
Date Sampled: 9 Sep 20 13:33
Date Received: 10 Sep 20 8:10
Sampled By: MVTL Field Services

Project Name: Minnkota - CCWDF

PO #: 200004

Sample Description: 92-5A

Temp at Receipt: 0.5C ROI

Event and Year: Fall 2020

	As Received Result		Method RL	Method Reference	Date Analyzed	Analyst
Metal Digestion				EPA 200.2	10 Sep 20	HT
Total Suspended Solids	183	mg/l	2	USGS I3765-85	10 Sep 20 16:00	HT
Conductivity (EC)	1099	umhos/cm	1	SM2510B-11	10 Sep 20 17:00	HT
pH - Field	9.06	units	NA	SM 4500 H+ B	9 Sep 20 13:33	JSM
pH	* 8.9	units	0.1	SM4500-H+-B-11	10 Sep 20 17:00	HT
Temperature - Field	8.66	Degrees C	NA	SM 2550B	9 Sep 20 13:33	JSM
Total Alkalinity	510	mg/l CaCO3	20	SM2320B-11	10 Sep 20 17:00	HT
Phenolphthalein Alk	29	mg/l CaCO3	20	SM2320B-11	10 Sep 20 17:00	HT
Bicarbonate	451	mg/l CaCO3	20	SM2320B-11	10 Sep 20 17:00	HT
Carbonate	59	mg/l CaCO3	20	SM2320B-11	10 Sep 20 17:00	HT
Hydroxide	< 20	mg/l CaCO3	20	SM2320B-11	10 Sep 20 17:00	HT
Conductivity - Field	1071	umhos/cm	1	EPA 120.1	9 Sep 20 13:33	JSM
Tot Dis Solids(Summation)	686	mg/l	12.5	SM1030-F	17 Sep 20 8:50	Calculatec
Total Hardness as CaCO3	34.8	mg/l	NA	SM2340B-11	14 Sep 20 13:15	Calculatec
Cation Summation	12.9	meq/L	NA	SM1030-F	15 Sep 20 9:55	Calculatec
Anion Summation	12.0	meq/L	NA	SM1030-F	17 Sep 20 8:50	Calculatec
Percent Error	3.42	%	NA	SM1030-F	17 Sep 20 8:50	Calculatec
Fluoride	0.50	mg/l	0.10	SM4500-F-C	11 Sep 20 17:00	HT
Sulfate	85.5	mg/l	5.00	ASTM D516-11	16 Sep 20 9:14	EV
Chloride	2.3	mg/l	1.0	SM4500-Cl-E-11	14 Sep 20 9:54	EV
Nitrate-Nitrite as N	< 0.1	mg/l	0.10	EPA 353.2	17 Sep 20 8:50	EV
Phosphorus as P - Total	0.23	mg/l	0.10	EPA 365.1	11 Sep 20 8:25	EV
Mercury - Dissolved	< 0.0002	mg/l	0.0002	EPA 245.1	18 Sep 20 15:01	MDE
Calcium - Total	5.2	mg/l	1.0	6010D	14 Sep 20 13:15	SZ
Magnesium - Total	5.3	mg/l	1.0	6010D	14 Sep 20 13:15	SZ
Sodium - Total	279	mg/l	1.0	6010D	14 Sep 20 13:15	SZ
Potassium - Total	2.2	mg/l	1.0	6010D	14 Sep 20 13:15	SZ
Iron - Dissolved	0.30	mg/l	0.10	6010D	15 Sep 20 9:55	MDE
Manganese - Dissolved	< 0.05	mg/l	0.05	6010D	15 Sep 20 9:55	MDE
Boron - Dissolved	0.34	mg/l	0.10	6010D	11 Sep 20 9:57	MDE
Arsenic - Dissolved	< 0.002	mg/l	0.0020	6020B	14 Sep 20 16:12	MDE
Barium - Dissolved	0.0586	mg/l	0.0020	6020B	14 Sep 20 16:12	MDE
Beryllium - Dissolved	< 0.0005	mg/l	0.0005	6020B	14 Sep 20 16:12	MDE
Cadmium - Dissolved	< 0.0005	mg/l	0.0005	6020B	14 Sep 20 16:12	MDE
Chromium - Dissolved	< 0.002	mg/l	0.0020	6020B	14 Sep 20 16:12	MDE

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

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! = Due to sample quantity + = Due to internal standard response

CERTIFICATION: ND # ND-00016



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Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 24 Aug 20
Lab Number: 20-W2873
Work Order #: 82-2147
Account #: 007048
Date Sampled: 6 Aug 20 15:55
Date Received: 7 Aug 20 8:00
Sampled By: MVTL Field Service

Project Name: Minnkota - CCWDF

Sample Description: 97-1

PO #: 200004

Event and Year: Fall 2020

Temp at Receipt: 0.2C

Table with 7 columns: Analyte, As Received Result, Method RL, Method Reference, Date Analyzed, and Analyst. Rows include Molybdenum - Dissolved, Selenium - Dissolved, and Silver - Dissolved.

* Holding time exceeded

^ Elevated result due to instrument performance at the lower limit of quantification (LLOQ).

Approved by:

Claudette K. Carroll

CC
25 Aug 2020

Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

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! = Due to sample quantity + = Due to internal standard response

CERTIFICATION: ND # ND-00016



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Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 24 Aug 20
Lab Number: 20-W2869
Work Order #: 82-2147
Account #: 007048
Date Sampled: 5 Aug 20 16:40
Date Received: 7 Aug 20 8:00
Sampled By: MVTL Field Service

Project Name: Minnkota - CCWDF

PO #: 200004

Sample Description: 95-4

Temp at Receipt: 0.2C

Event and Year: Fall 2020

Table with columns: As Received Result, Method RL, Method Reference, Date Analyzed, Analyst. Rows include various chemical tests like pH, Conductivity, Total Suspended Solids, etc.

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

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! = Due to sample quantity + = Due to internal standard response

CERTIFICATION: ND # ND-00016



MINNESOTA VALLEY TESTING LABORATORIES, INC.

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Page: 2 of 2

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 24 Aug 20
Lab Number: 20-W2869
Work Order #: 82-2147
Account #: 007048
Date Sampled: 5 Aug 20 16:40
Date Received: 7 Aug 20 8:00
Sampled By: MVTL Field Service

Project Name: Minnkota - CCWDF

PO #: 200004

Sample Description: 95-4

Temp at Receipt: 0.2C

Event and Year: Fall 2020

	As Received Result		Method RL	Method Reference	Date Analyzed	Analyst
Molybdenum - Dissolved	< 0.002 mg/l		0.0020	6020B	12 Aug 20 12:39	MDE
Selenium - Dissolved	< 0.005 mg/l		0.0050	6020B	12 Aug 20 12:39	MDE
Silver - Dissolved	< 0.0005 mg/l		0.0005	6020B	12 Aug 20 12:39	MDE

* Holding time exceeded

cc

Approved by: Claudette K. Carroll 25 Aug 2020

Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

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Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 24 Aug 20
Lab Number: 20-W2868
Work Order #: 82-2147
Account #: 007048
Date Sampled: 5 Aug 20 14:57
Date Received: 7 Aug 20 8:00
Sampled By: MVTL Field Service

Project Name: Minnkota - CCWDF

PO #: 200004

Sample Description: 92-3

Temp at Receipt: 0.2C

Event and Year: Fall 2020

	As Received Result		Method RL	Method Reference	Date Analyzed	Analyst
Metal Digestion				EPA 200.2	7 Aug 20	HT
pH	* 8.8	units	N/A	SM4500-H+-B-11	7 Aug 20 18:00	HT
Conductivity (EC)	1822	umhos/cm	N/A	SM2510B-11	7 Aug 20 18:00	HT
Total Suspended Solids	< 2	mg/l	2	USGS I3765-85	7 Aug 20 15:30	HT
pH - Field	8.66	units	NA	SM 4500 H+ B	5 Aug 20 14:57	DJN
Temperature - Field	9.14	Degrees C	NA	SM 2550B	5 Aug 20 14:57	DJN
Total Alkalinity	901	mg/l CaCO3	20	SM2320B-11	7 Aug 20 18:00	HT
Phenolphthalein Alk	34	mg/l CaCO3	20	SM2320B-11	7 Aug 20 18:00	HT
Bicarbonate	832	mg/l CaCO3	20	SM2320B-11	7 Aug 20 18:00	HT
Carbonate	69	mg/l CaCO3	20	SM2320B-11	7 Aug 20 18:00	HT
Hydroxide	< 20	mg/l CaCO3	20	SM2320B-11	7 Aug 20 18:00	HT
Conductivity - Field	1797	umhos/cm	1	EPA 120.1	5 Aug 20 14:57	DJN
Tot Dis Solids(Summation)	1120	mg/l	12.5	SM1030-F	13 Aug 20 9:14	Calculatec
Total Hardness as CaCO3	10.9	mg/l	NA	SM2340B-11	11 Aug 20 15:10	Calculatec
Cation Summation	19.7	meq/L	NA	SM1030-F	11 Aug 20 15:10	Calculatec
Anion Summation	20.6	meq/L	NA	SM1030-F	13 Aug 20 9:14	Calculatec
Percent Error	-2.24	%	NA	SM1030-F	13 Aug 20 9:14	Calculatec
Fluoride	1.63	mg/l	0.10	SM4500-F-C	7 Aug 20 18:00	HT
Sulfate	117	mg/l	5.00	ASTM D516-11	10 Aug 20 11:25	SD
Chloride	6.2	mg/l	1.0	SM4500-Cl-E-11	7 Aug 20 12:19	SD
Nitrate-Nitrite as N	< 0.1	mg/l	0.10	EPA 353.2	13 Aug 20 9:14	SD
Phosphorus as P - Total	0.26	mg/l	0.10	EPA 365.1	14 Aug 20 8:39	EV
Mercury - Dissolved	< 0.0002	mg/l	0.0002	EPA 245.1	14 Aug 20 12:22	MDE
Calcium - Total	2.4	mg/l	1.0	6010D	11 Aug 20 15:10	MDE
Magnesium - Total	1.2	mg/l	1.0	6010D	11 Aug 20 15:10	MDE
Sodium - Total	447	mg/l	1.0	6010D	11 Aug 20 15:10	MDE
Potassium - Total	2.5	mg/l	1.0	6010D	11 Aug 20 15:10	MDE
Iron - Dissolved	< 0.1	mg/l	0.10	6010D	10 Aug 20 15:07	SZ
Manganese - Dissolved	< 0.05	mg/l	0.05	6010D	10 Aug 20 15:07	SZ
Boron - Dissolved	0.45	mg/l	0.10	6010D	12 Aug 20 13:07	MDE
Arsenic - Dissolved	< 0.002	mg/l	0.0020	6020B	12 Aug 20 12:39	MDE
Barium - Dissolved	0.1072	mg/l	0.0020	6020B	12 Aug 20 12:39	MDE
Beryllium - Dissolved	< 0.0005	mg/l	0.0005	6020B	12 Aug 20 12:39	MDE
Cadmium - Dissolved	< 0.0005	mg/l	0.0005	6020B	12 Aug 20 12:39	MDE
Chromium - Dissolved	< 0.002	mg/l	0.0020	6020B	12 Aug 20 12:39	MDE
Lead - Dissolved	< 0.0005	mg/l	0.0005	6020B	12 Aug 20 12:39	MDE

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

@ = Due to sample matrix # = Due to concentration of other analytes
! = Due to sample quantity + = Due to internal standard response

CERTIFICATION: ND # ND-00016



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www.mvttl.com



Page: 1 of 2

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 24 Aug 20
Lab Number: 20-W2867
Work Order #: 82-2147
Account #: 007048
Date Sampled: 5 Aug 20 11:01
Date Received: 7 Aug 20 8:00
Sampled By: MVT L Field Service

Project Name: Minnkota - CCWDF

PO #: 200004

Sample Description: 92-6A

Temp at Receipt: 0.2C

Event and Year: Fall 2020

	As Received Result		Method RL	Method Reference	Date Analyzed	Analyst
Metal Digestion				EPA 200.2	7 Aug 20	HT
pH	* 8.5	units	N/A	SM4500-H+-B-11	7 Aug 20 18:00	HT
Conductivity (EC)	1646	umhos/cm	N/A	SM2510B-11	7 Aug 20 18:00	HT
Total Suspended Solids	7	mg/l	2	USGS I3765-85	7 Aug 20 15:30	HT
pH - Field	8.84	units	NA	SM 4500 H+ B	5 Aug 20 11:01	DJN
Temperature - Field	8.22	Degrees C	NA	SM 2550B	5 Aug 20 11:01	DJN
Total Alkalinity	799	mg/l CaCO3	20	SM2320B-11	7 Aug 20 18:00	HT
Phenolphthalein Alk	< 20	mg/l CaCO3	20	SM2320B-11	7 Aug 20 18:00	HT
Bicarbonate	783	mg/l CaCO3	20	SM2320B-11	7 Aug 20 18:00	HT
Carbonate	< 20	mg/l CaCO3	20	SM2320B-11	7 Aug 20 18:00	HT
Hydroxide	< 20	mg/l CaCO3	20	SM2320B-11	7 Aug 20 18:00	HT
Conductivity - Field	1618	umhos/cm	1	EPA 120.1	5 Aug 20 11:01	DJN
Tot Dis Solids(Summation)	1090	mg/l	12.5	SM1030-F	13 Aug 20 9:14	Calculated
Total Hardness as CaCO3	11.2	mg/l	NA	SM2340B-11	11 Aug 20 14:10	Calculated
Cation Summation	17.3	meq/L	NA	SM1030-F	11 Aug 20 14:10	Calculated
Anion Summation	20.4	meq/L	NA	SM1030-F	13 Aug 20 9:14	Calculated
Percent Error	-8.21	%	NA	SM1030-F	13 Aug 20 9:14	Calculated
Fluoride	0.97	mg/l	0.10	SM4500-F-C	7 Aug 20 18:00	HT
Sulfate	211	mg/l	5.00	ASTM D516-11	10 Aug 20 11:25	SD
Chloride	2.3	mg/l	1.0	SM4500-Cl-E-11	7 Aug 20 12:19	SD
Nitrate-Nitrite as N	< 0.1	mg/l	0.10	EPA 353.2	13 Aug 20 9:14	SD
Phosphorus as P - Total	0.13	mg/l	0.10	EPA 365.1	14 Aug 20 8:39	EV
Mercury - Dissolved	< 0.0002	mg/l	0.0002	EPA 245.1	14 Aug 20 12:22	MDE
Calcium - Total	2.5	mg/l	1.0	6010D	11 Aug 20 14:10	MDE
Magnesium - Total	1.2	mg/l	1.0	6010D	11 Aug 20 14:10	MDE
Sodium - Total	392	mg/l	1.0	6010D	11 Aug 20 14:10	MDE
Potassium - Total	2.5	mg/l	1.0	6010D	11 Aug 20 14:10	MDE
Iron - Dissolved	< 0.1	mg/l	0.10	6010D	10 Aug 20 15:07	SZ
Manganese - Dissolved	< 0.05	mg/l	0.05	6010D	10 Aug 20 15:07	SZ
Boron - Dissolved	0.39	mg/l	0.10	6010D	12 Aug 20 12:07	MDE
Arsenic - Dissolved	< 0.002	mg/l	0.0020	6020B	12 Aug 20 12:39	MDE
Barium - Dissolved	0.0146	mg/l	0.0020	6020B	12 Aug 20 12:39	MDE
Beryllium - Dissolved	< 0.0005	mg/l	0.0005	6020B	12 Aug 20 12:39	MDE
Cadmium - Dissolved	< 0.0005	mg/l	0.0005	6020B	12 Aug 20 12:39	MDE
Chromium - Dissolved	< 0.002	mg/l	0.0020	6020B	12 Aug 20 12:39	MDE
Lead - Dissolved	< 0.0005	mg/l	0.0005	6020B	12 Aug 20 12:39	MDE

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

@ = Due to sample matrix # = Due to concentration of other analytes
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CERTIFICATION: ND # ND-00016



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Page: 2 of 2

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 24 Aug 20
Lab Number: 20-W2867
Work Order #: 82-2147
Account #: 007048
Date Sampled: 5 Aug 20 11:01
Date Received: 7 Aug 20 8:00
Sampled By: MVTL Field Service

Project Name: Minnkota - CCWDF

PO #: 200004

Sample Description: 92-6A

Temp at Receipt: 0.2C

Event and Year: Fall 2020

	As Received Result		Method RL	Method Reference	Date Analyzed	Analyst
Molybdenum - Dissolved	< 0.002 mg/l		0.0020	6020B	12 Aug 20 12:39	MDE
Selenium - Dissolved	< 0.005 mg/l		0.0050	6020B	12 Aug 20 12:39	MDE
Silver - Dissolved	< 0.0005 mg/l		0.0005	6020B	12 Aug 20 12:39	MDE

* Holding time exceeded

CC

Approved by: Claudette K. Carroll 25 Aug 2020

Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:
@ = Due to sample matrix # = Due to concentration of other analytes
! = Due to sample quantity + = Due to internal standard response

CERTIFICATION: ND # ND-00016



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Page: 1 of 2

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 1 May 20
Lab Number: 20-W774
Work Order #: 82-0961
Account #: 007048
Date Sampled: 23 Apr 20 13:17
Date Received: 24 Apr 20 7:28
Sampled By: MVTL Field Services

Project Name: Minnkota - CCWDF

Sample Description: 92-5A

PO #: 200004

Event and Year: Spring 2020

Temp at Receipt: 3.8C ROI

Table with columns: As Received Result, Method RL, Method Reference, Date Analyzed, Analyst. Rows include various chemical tests like Metal Digestion, pH, Conductivity, etc.

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:
@ = Due to sample matrix # = Due to concentration of other analytes
! = Due to sample quantity + = Due to internal standard response

CERTIFICATION: ND # ND-00016



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Page: 2 of 2

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 1 May 20
Lab Number: 20-W776
Work Order #: 82-0961
Account #: 007048
Date Sampled: 23 Apr 20 16:51
Date Received: 24 Apr 20 7:28
Sampled By: MVTL Field Services

Project Name: Minnkota - CCWDF

PO #: 200004

Sample Description: 92-3

Temp at Receipt: 3.8C ROI

Event and Year: Spring 2020

	As Received Result	Method RL	Method Reference	Date Analyzed	Analyst
Molybdenum - Dissolved	< 0.002 mg/l	0.0020	6020B	27 Apr 20 13:10	CC
Selenium - Dissolved	< 0.005 mg/l	0.0050	6020B	27 Apr 20 13:10	CC
Silver - Dissolved	< 0.0005 mg/l	0.0005	6020B	27 Apr 20 13:10	CC

* Holding time exceeded

Approved by: Claudette K. Carroll ^{CC} 8 May 2020
Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit
The reporting limit was elevated for any analyte requiring a dilution as coded below:
@ = Due to sample matrix # = Due to concentration of other analytes
! = Due to sample quantity + = Due to internal standard response
CERTIFICATION: ND # ND-00016



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Page: 2 of 2

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 1 May 20
Lab Number: 20-W777
Work Order #: 82-0961
Account #: 007048
Date Sampled: 23 Apr 20 15:09
Date Received: 24 Apr 20 7:28
Sampled By: MVTL Field Services

Project Name: Minnkota - CCWDF

PO #: 200004

Sample Description: 95-4

Temp at Receipt: 3.8C ROI

Event and Year: Spring 2020

	As Received Result		Method RL	Method Reference	Date Analyzed	Analyst
Molybdenum - Dissolved	< 0.002	mg/l	0.0020	6020B	27 Apr 20 13:10	CC
Selenium - Dissolved	< 0.005	mg/l	0.0050	6020B	27 Apr 20 13:10	CC
Silver - Dissolved	< 0.0005	mg/l	0.0005	6020B	27 Apr 20 13:10	CC

* Holding time exceeded

Approved by: *CC*
Claudette K. Carroll 8 May 2020
Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit
The reporting limit was elevated for any analyte requiring a dilution as coded below:
@ = Due to sample matrix # = Due to concentration of other analytes
! = Due to sample quantity + = Due to internal standard response
CERTIFICATION: ND # ND-00016

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Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 1 May 20
Lab Number: 20-W781
Work Order #: 82-0961
Account #: 007048
Date Sampled: 23 Apr 20 13:28
Date Received: 24 Apr 20 7:28
Sampled By: MVTL Field Services

Project Name: Minnkota - CCWDF

PO #: 200004

Sample Description: 97-1

Temp at Receipt: 3.8C ROI

Event and Year: Spring 2020

	As Received Result		Method RL	Method Reference	Date Analyzed	Analyst
Metal Digestion				EPA 200.2	24 Apr 20	SD
pH	* 6.7	units	N/A	SM4500 H+ B	24 Apr 20 17:00	SD
Conductivity (EC)	3597	umhos/cm	N/A	SM2510-B	24 Apr 20 17:00	SD
Total Suspended Solids	64	mg/l	2	I3765-85	24 Apr 20 16:40	HT
pH - Field	6.33	units	NA	SM 4500 H+ B	23 Apr 20 13:28	JSM
Temperature - Field	10.3	Degrees C	NA	SM 2550B	23 Apr 20 13:28	JSM
Total Alkalinity	327	mg/l CaCO3	20	SM2320-B	24 Apr 20 17:00	SD
Phenolphthalein Alk	< 20	mg/l CaCO3	20	SM2320-B	24 Apr 20 17:00	SD
Bicarbonate	327	mg/l CaCO3	20	SM2320-B	24 Apr 20 17:00	SD
Carbonate	< 20	mg/l CaCO3	20	SM2320-B	24 Apr 20 17:00	SD
Hydroxide	< 20	mg/l CaCO3	20	SM2320-B	24 Apr 20 17:00	SD
Conductivity - Field	3447	umhos/cm	1	EPA 120.1	23 Apr 20 13:28	JSM
Tot Dis Solids(Summation)	3130	mg/l	12.5	SM1030-F	30 Apr 20 8:44	Calculated
Total Hardness as CaCO3	2200	mg/l	NA	SM2340-B	27 Apr 20 11:26	Calculated
Cation Summation	53.1	meq/L	NA	SM1030-F	30 Apr 20 9:58	Calculated
Anion Summation	48.8	meq/L	NA	SM1030-F	30 Apr 20 8:44	Calculated
Percent Error	4.20	%	NA	SM1030-F	30 Apr 20 9:58	Calculated
Fluoride	0.10	mg/l	0.10	SM4500-F-C	24 Apr 20 17:00	SD
Sulfate	1960	mg/l	5.00	ASTM D516-11	29 Apr 20 9:08	EV
Chloride	51.9	mg/l	1.0	SM4500-Cl-E	27 Apr 20 10:57	EV
Nitrate-Nitrite as N	0.11	mg/l	0.10	EPA 353.2	30 Apr 20 8:44	EV
Phosphorus as P - Total	< 0.1	mg/l	0.10	EPA 365.1	1 May 20 8:34	EMS
Mercury - Dissolved	< 0.0002	mg/l	0.0002	EPA 245.1	29 Apr 20 12:59	MDE
Calcium - Total	475	mg/l	1.0	6010D	27 Apr 20 11:26	MDE
Magnesium - Total	246	mg/l	1.0	6010D	27 Apr 20 11:26	MDE
Sodium - Total	196	mg/l	1.0	6010D	27 Apr 20 11:26	MDE
Potassium - Total	5.3	mg/l	1.0	6010D	27 Apr 20 11:26	MDE
Iron - Dissolved	12.3	mg/l	0.10	6010D	30 Apr 20 9:58	MDE
Manganese - Dissolved	1.33	mg/l	0.05	6010D	30 Apr 20 9:58	MDE
Boron - Dissolved	0.34	mg/l	0.10	6010D	28 Apr 20 12:30	SZ
Arsenic - Dissolved	< 0.002	mg/l	0.0020	6020B	27 Apr 20 13:10	CC
Barium - Dissolved	0.0440	mg/l	0.0020	6020B	27 Apr 20 15:50	CC
Beryllium - Dissolved	< 0.0005	mg/l	0.0005	6020B	27 Apr 20 13:10	CC
Cadmium - Dissolved	< 0.0005	mg/l	0.0005	6020B	27 Apr 20 13:10	CC
Chromium - Dissolved	< 0.002	mg/l	0.0020	6020B	27 Apr 20 13:10	CC
Lead - Dissolved	< 0.0005	mg/l	0.0005	6020B	27 Apr 20 13:10	CC

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

@ = Due to sample matrix # = Due to concentration of other analytes
! = Due to sample quantity + = Due to internal standard response

CERTIFICATION: ND # ND-00016



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CERTIFICATE of ANALYSIS - STATE

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 3 Oct 19
Lab Number: 19-W3428
Work Order #: 82-2442
Account #: 007048
Date Sampled: 5 Sep 19 14:18
Date Received: 6 Sep 19 8:00
Sampled By: MVT L Field Services

Project Name: Minnkota - CCWDF - Hagel

PO #: 190093

Sample Description: 97-1

Temp at Receipt: 3.7C

Event and Year: Fall 2019

Table with columns: As Received Result, Method RL, Method Reference, Date Analyzed, Analyst. Rows include various chemical and physical tests like Metal Digestion, Conductivity, pH, Temperature, etc.

RL - Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:
@ = Due to sample matrix # = Due to concentration of other analytes
! = Due to sample quantity + = Due to internal standard response

CERTIFICATION: ND # ND-00016



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Page: 2 of 2

Amended 5 Oct 19 (Pb result) - STATE

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 3 Oct 19
Lab Number: 19-W3428
Work Order #: 82-2442
Account #: 007048
Date Sampled: 5 Sep 19 14:18
Date Received: 6 Sep 19 8:00
Sampled By: MVTL Field Services

Project Name: Minnkota - CCWDF - Hagel

PO #: 190093

Sample Description: 97-1

Temp at Receipt: 3.7C

Event and Year: Fall 2019

	As Received Result		Method RL	Method Reference	Date Analyzed	Analyst
Lead - Dissolved	< 0.001 *	mg/l	0.0005	6020B	2 Oct 19 13:37	MDE
Molybdenum - Dissolved	< 0.002	mg/l	0.0020	6020B	2 Oct 19 13:37	MDE
Selenium - Dissolved	< 0.005	mg/l	0.0050	6020B	2 Oct 19 13:37	MDE
Silver - Dissolved	< 0.0005	mg/l	0.0005	6020B	2 Oct 19 13:37	MDE

* Holding time exceeded

^ Elevated result due to instrument performance at the lower limit of quantification (LLOQ).

Approved by:

Claudette K. Carroll

CC
50CT19

Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

⊙ = Due to sample matrix # = Due to concentration of other analytes
! = Due to sample quantity + = Due to internal standard response

CERTIFICATION: ND # ND-00016



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CERTIFICATE of ANALYSIS - STATE

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 1 Oct 19
Lab Number: 19-W3421
Work Order #: 82-2441
Account #: 007048
Date Sampled: 5 Sep 19 14:05
Date Received: 6 Sep 19 8:00
Sampled By: MVTL Field Services

Project Name: Minnkota - CCWDF

PO #: 190093

Sample Description: 92-5A

Temp at Receipt: 3.7C

Event and Year: Fall 2019

Table with 6 columns: Analyte, As Received Result, Method RL, Method Reference, Date Analyzed, Analyst. Rows include Lead - Dissolved, Molybdenum - Dissolved, Selenium - Dissolved, and Silver - Dissolved.

* Holding time exceeded

Approved by: Claudette K. Carroll 1 OCT 19
Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:
@ = Due to sample matrix # = Due to concentration of other analytes
! = Due to sample quantity + = Due to internal standard response

CERTIFICATION: ND # ND-00016



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CERTIFICATE of ANALYSIS - STATE

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 1 Oct 19
Lab Number: 19-W3422
Work Order #: 82-2441
Account #: 007048
Date Sampled: 4 Sep 19 16:01
Date Received: 6 Sep 19 8:00
Sampled By: MVTL Field Services

Project Name: Minnkota - CCWDF

PO #: 190093

Sample Description: 92-6A

Temp at Receipt: 3.7C

Event and Year: Fall 2019

Table with columns: As Received Result, Method RL, Method Reference, Date Analyzed, Analyst. Rows include various chemical and physical tests like Metal Digestion, Conductivity, pH, Temperature, etc.

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

@ = Due to sample matrix # = Due to concentration of other analytes
! = Due to sample quantity + = Due to internal standard response

CERTIFICATION: ND # ND-00016



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CERTIFICATE of ANALYSIS - STATE

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 1 Oct 19
Lab Number: 19-W3422
Work Order #: 82-2441
Account #: 007048
Date Sampled: 4 Sep 19 16:01
Date Received: 6 Sep 19 8:00
Sampled By: MVTl Field Services

Project Name: Minnkota - CCWDF

PO #: 190093

Sample Description: 92-6A

Temp at Receipt: 3.7C

Event and Year: Fall 2019

	As Received Result		Method RL	Method Reference	Date Analyzed	Analyst
Lead - Dissolved	< 0.0005 mg/l		0.0005	6020B	17 Sep 19 9:30	MDE
Molybdenum - Dissolved	< 0.002 mg/l		0.0020	6020B	17 Sep 19 9:30	MDE
Selenium - Dissolved	< 0.005 mg/l		0.0050	6020B	17 Sep 19 9:30	MDE
Silver - Dissolved	< 0.0005 mg/l		0.0005	6020B	17 Sep 19 9:30	MDE

* Holding time exceeded

Approved by: Claudette K Carroll

CC
1 OCT 19

Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

- ⊙ = Due to sample matrix
- ! = Due to sample quantity
- # = Due to concentration of other analytes
- + = Due to internal standard response

CERTIFICATION: ND # ND-00016



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CERTIFICATE of ANALYSIS - STATE

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 1 Oct 19
Lab Number: 19-W3423
Work Order #: 82-2441
Account #: 007048
Date Sampled: 5 Sep 19 16:15
Date Received: 6 Sep 19 8:00
Sampled By: MVTl Field Services

Project Name: Minnkota - CCWDF

PO #: 190093

Sample Description: 92-3

Temp at Receipt: 3.7C

Event and Year: Fall 2019

Table with 6 columns: Analyte, As Received Result, Method RL, Method Reference, Date Analyzed, and Analyst. Rows include Lead - Dissolved, Molybdenum - Dissolved, Selenium - Dissolved, and Silver - Dissolved.

* Holding time exceeded

Approved by: Claudette K. Carroll (handwritten signature) 10 OCT 19 (handwritten date)
Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit
The reporting limit was elevated for any analyte requiring a dilution as coded below:
@ = Due to sample matrix # = Due to concentration of other analytes
! = Due to sample quantity + = Due to internal standard response
CERTIFICATION: ND # ND-00016

MVTl guarantees the accuracy of the analysis done on the sample submitted for testing. It is not possible for MVTl to guarantee that a test result obtained on a particular sample will be the same on any other sample unless all conditions affecting the sample are the same, including sampling by MVTl. As a mutual protection to clients, the public and ourselves, all reports are submitted as the confidential property of clients, and authorization for publication of statements, conclusions or extracts from or regarding our reports is reserved pending our written approval.



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CERTIFICATE of ANALYSIS - STATE

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 1 Oct 19
Lab Number: 19-W3424
Work Order #: 82-2441
Account #: 007048
Date Sampled: 5 Sep 19 17:59
Date Received: 6 Sep 19 8:00
Sampled By: MVTL Field Services

Project Name: Minnkota - CCWDF

PO #: 190093

Sample Description: 95-4

Temp at Receipt: 3.7C

Event and Year: Fall 2019

Table with 6 columns: Analyte, As Received Result, Method RL, Method Reference, Date Analyzed, Analyst. Rows include Lead - Dissolved, Molybdenum - Dissolved, Selenium - Dissolved, and Silver - Dissolved.

* Holding time exceeded

Approved by: Claudette K. Carroll (signature) 10 OCT 19
Claudette K. Carroll, Laboratory Manager, Bismarck, ND

EL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:
@ = Due to sample matrix # = Due to concentration of other analytes
! = Due to sample quantity * = Due to internal standard response

CERTIFICATION: ND # ND-00016



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Page: 1 of 2

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 17 Jun 19
Lab Number: 19-W1534
Work Order #: 82-1235
Account #: 007048
Date Sampled: 28 May 19 14:41
Date Received: 30 May 19 8:00
Sampled By: MVTL Field Services

Project Name: Minnkota-CCWDF

PO #: 190093

Sample Description: 92-3

Temp at Receipt: 3.2C

Event and Year: May 2019

Table with columns: As Received Result, Method RL, Method Reference, Date Analyzed, Analyst. Rows include various chemical and physical parameters like pH, Conductivity, Total Suspended Solids, etc.

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

@ = Due to sample matrix # = Due to concentration of other analytes
! = Due to sample quantity + = Due to internal standard response

CERTIFICATION: ND # ND-00016



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Page: 2 of 2

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 17 Jun 19
Lab Number: 19-W1534
Work Order #: 82-1235
Account #: 007048
Date Sampled: 28 May 19 14:41
Date Received: 30 May 19 8:00
Sampled By: MVTL Field Services

Project Name: Minnkota-CCWDF

PO #: 190093

Sample Description: 92-3

Temp at Receipt: 3.2C

Event and Year: May 2019

Table with 6 columns: Analyte, As Received Result, Method RL, Method Reference, Date Analyzed, Analyst. Rows include Molybdenum - Dissolved, Selenium - Dissolved, and Silver - Dissolved.

* Holding time exceeded

Approved by: Claudette K. Carroll (handwritten signature) 28 Jun 19 (handwritten date)
Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit

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CERTIFICATION: ND # ND-00016



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Page: 1 of 2

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 17 Jun 19
Lab Number: 19-W1535
Work Order #: 82-1235
Account #: 007048
Date Sampled: 28 May 19 16:23
Date Received: 30 May 19 8:00
Sampled By: MVTL Field Services

Project Name: Minnkota-CCWDF

PO #: 190093

Sample Description: 95-4

Temp at Receipt: 3.2C

Event and Year: May 2019

Table with columns: As Received Result, Method RL, Method Reference, Date Analyzed, Analyst. Rows include various chemical and physical tests like pH, Conductivity, Total Suspended Solids, etc.

RL = Method Reporting Limit

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! = Due to sample quantity + = Due to internal standard response

CERTIFICATION: ND # ND-00016



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Page: 2 of 2

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 17 Jun 19
Lab Number: 19-W1535
Work Order #: 82-1235
Account #: 007048
Date Sampled: 28 May 19 16:23
Date Received: 30 May 19 8:00
Sampled By: MVTL Field Services

Project Name: Minnkota-CCWDF

PO #: 190093

Sample Description: 95-4

Temp at Receipt: 3.2C

Event and Year: May 2019

Table with 6 columns: Analyte, As Received Result, Method RL, Method Reference, Date Analyzed, Analyst. Rows include Molybdenum - Dissolved, Selenium - Dissolved, and Silver - Dissolved.

* Holding time exceeded

Approved by: Claudette K. Carroll 28 Jun 19

Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit

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! = Due to sample quantity + = Due to internal standard response

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Page: 1 of 2

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 17 Jun 19
Lab Number: 19-W1533
Work Order #: 82-1235
Account #: 007048
Date Sampled: 28 May 19 12:23
Date Received: 30 May 19 8:00
Sampled By: MVTL Field Services

Project Name: Minnkota-CCWDF

PO #: 190093

Sample Description: 92-6A

Temp at Receipt: 3.2C

Event and Year: May 2019

Table with columns: As Received Result, Method RL, Method Reference, Date Analyzed, Analyst. Rows include various chemical tests like pH, Conductivity, Total Suspended Solids, etc.

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:
@ = Due to sample matrix # = Due to concentration of other analytes
! = Due to sample quantity + = Due to internal standard response

CERTIFICATION: ND # ND-00016



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Page: 2 of 2

Scott Hopfauf
 Minnkota Power Cooperative
 3401 24th St SW
 Center ND 58530

Report Date: 17 Jun 19
 Lab Number: 19-W1533
 Work Order #: 82-1235
 Account #: 007048
 Date Sampled: 28 May 19 12:23
 Date Received: 30 May 19 8:00
 Sampled By: MVTL Field Services

Project Name: Minnkota-CCWDF

Sample Description: 92-6A

PO #: 190093

Event and Year: May 2019

Temp at Receipt: 3.2C

	As Received Result		Method RL	Method Reference	Date Analyzed	Analyst
Molybdenum - Dissolved	< 0.002	mg/l	0.0020	6020B	11 Jun 19 15:27	MDE
Selenium - Dissolved	< 0.005	mg/l	0.0050	6020B	12 Jun 19 10:10	MDE
Silver - Dissolved	< 0.0005	mg/l	0.0005	6020B	11 Jun 19 15:27	MDE

* Holding time exceeded

CC

Approved by: Claudette K. Carroll 28 Jun 19

Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

- = Due to sample matrix
- ! = Due to sample quantity
- # = Due to concentration of other analytes
- + = Due to internal standard response

CERTIFICATION: ND # ND-00016



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Page: 2 of 2

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 17 Jun 19
Lab Number: 19-W1532
Work Order #: 82-1235
Account #: 007048
Date Sampled: 29 May 19 12:10
Date Received: 30 May 19 8:00
Sampled By: MVTL Field Services

Project Name: Minnkota-CCWDF

PO #: 190093

Sample Description: 92-5A

Temp at Receipt: 3.2C

Event and Year: May 2019

Table with 6 columns: Analyte, As Received Result, Method, Method Reference, Date Analyzed, Analyst. Rows include Molybdenum - Dissolved, Selenium - Dissolved, and Silver - Dissolved.

* Holding time exceeded

Approved by: Claudette K Carroll 28 Jun 19
Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:
@ = Due to sample matrix # = Due to concentration of other analytes
! = Due to sample quantity + = Due to internal standard response

CERTIFICATION: ND # ND-00016



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Page: 2 of 2

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 19 Jun 19
Lab Number: 19-W1539
Work Order #: 82-1251
Account #: 007048
Date Sampled: 29 May 19 8:54
Date Received: 30 May 19 8:00
Sampled By: MVTL Field Services

Project Name: Minnkota-CCWDF

PO #: 190093

Sample Description: 97-1

Temp at Receipt: 3.2C

Event and Year: May 2019

Table with 6 columns: Analyte, As Received Result, Method RL, Method Reference, Date Analyzed, Analyst. Rows include Molybdenum - Dissolved, Selenium - Dissolved, and Silver - Dissolved.

* Holding time exceeded

^ Elevated result due to instrument performance at the lower limit of quantification (LLOQ).

Approved by:

Claudette K. Carroll

Handwritten initials CC and date 28 Jun 19

Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

- @ = Due to sample matrix
! = Due to sample quantity
= Due to concentration of other analytes
+ = Due to internal standard response

CERTIFICATION: ND # ND-00016



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CERTIFICATE of ANALYSIS - STATE

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 5 Oct 18
Lab Number: 18-W3108
Work Order #: 82-2513
Account #: 007048
Date Sampled: 25 Sep 18 11:04
Date Received: 25 Sep 18 15:49
Sampled By: MVTL Field Services

Project Name: Minnkota-CCWDF

PO #: 180247

Sample Description: 97-1

Temp at Receipt: 2.1C

Event and Year: Sept 2018

Table with columns: As Received Result, Method RL, Method Reference, Date Analyzed, Analyst. Rows include various chemical tests like Total Suspended Solids, Conductivity, pH, etc.

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

@ = Due to sample matrix # = Due to concentration of other analytes
! = Due to sample quantity + = Due to internal standard response

CERTIFICATION: ND # ND-00016



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Page: 2 of 10

CERTIFICATE of ANALYSIS - STATE

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 5 Oct 18
Lab Number: 18-W3108
Work Order #: 82-2513
Account #: 007048
Date Sampled: 25 Sep 18 11:04
Date Received: 25 Sep 18 15:49
Sampled By: MVTl Field Services

Project Name: Minnkota-CCWDF

Sample Description: 97-1

PO #: 180247

Event and Year: Sept 2018

Temp at Receipt: 2.1C

Table with 6 columns: Analyte, As Received Result, Method, Method Reference, Date Analyzed, Analyst. Rows include Molybdenum - Dissolved, Selenium - Dissolved, and Silver - Dissolved.

* Holding time exceeded

Approved by:

Claudette K. Carroll

10 OCT 18

Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

- @ = Due to sample matrix
! = Due to sample quantity
= Due to concentration of other analytes
+ = Due to internal standard response

CERTIFICATION: ND # ND-00016



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CERTIFICATE of ANALYSIS - STATE

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 5 Oct 18
Lab Number: 18-W3109
Work Order #: 82-2513
Account #: 007048
Date Sampled: 24 Sep 18 18:02
Date Received: 25 Sep 18 15:49
Sampled By: MVTL Field Services

Project Name: Minnkota-CCWDF

PO #: 180247

Sample Description: 92-5A

Temp at Receipt: 2.1C

Event and Year: Sept 2018

Table with columns: As Received Result, Method RL, Method Reference, Date Analyzed, Analyst. Rows include various chemical and physical tests like Metal Digestion, Conductivity, pH, Temperature, etc.

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

@ = Due to sample matrix # = Due to concentration of other analytes
! = Due to sample quantity + = Due to internal standard response

CERTIFICATION: ND # ND-00015



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CERTIFICATE of ANALYSIS - STATE

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 5 Oct 18
Lab Number: 18-W3109
Work Order #: 82-2513
Account #: 007048
Date Sampled: 24 Sep 18 18:02
Date Received: 25 Sep 18 15:49
Sampled By: MVTL Field Services

Project Name: Minnkota-CCWDF

PO #: 180247

Sample Description: 92-5A

Temp at Receipt: 2.1C

Event and Year: Sept 2018

	As Received Result	Method RL	Method Reference	Date Analyzed	Analyst
Molybdenum - Dissolved	< 0.002 mg/l	0.0020	6020B	27 Sep 18 18:24	BB
Selenium - Dissolved	< 0.005 mg/l	0.0050	6020B	27 Sep 18 18:16	CC
Silver - Dissolved	< 0.0005 mg/l	0.0005	6020B	27 Sep 18 18:24	BB

* Holding time exceeded

Approved by:

Claudette K Carroll

10 OCT 18

Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

@ = Due to sample matrix # = Due to concentration of other analytes
! = Due to sample quantity + = Due to internal standard response

CERTIFICATION: ND # ND-00016



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Page: 5 of 10

CERTIFICATE of ANALYSIS - STATE

Scott Hopfauf
 Minnkota Power Cooperative
 3401 24th St SW
 Center ND 58530

Report Date: 5 Oct 18
 Lab Number: 18-W3110
 Work Order #: 82-2513
 Account #: 007048
 Date Sampled: 25 Sep 18 10:41
 Date Received: 25 Sep 18 15:49
 Sampled By: MVTL Field Services

Project Name: Minnkota-CCWDF

PO #: 180247

Sample Description: 92-6A

Temp at Receipt: 2.1C

Event and Year: Sept 2018

	As Received Result		Method RL	Method Reference	Date Analyzed	Analyst
Metal Digestion				EPA 200.2	25 Sep 18	SVS
Total Suspended Solids	9	mg/l	2	I3765-85	25 Sep 18 17:38	SVS
Conductivity (EC)	1717	umhos/cm	1	SM2510-B	25 Sep 18 18:00	SVS
pH - Field	8.75	units	NA	SM 4500 H+ B	25 Sep 18 10:41	DJN
pH	* 8.8	units	0.1	SM4500 H+ B	25 Sep 18 18:00	SVS
Temperature - Field	7.77	Degrees C	NA	SM 2550B	25 Sep 18 10:41	DJN
Total Alkalinity	654	mg/l CaCO3	20	SM2320-B	26 Sep 18 18:00	SVS
Phenolphthalein Alk	36	mg/l CaCO3	20	SM2320-B	26 Sep 18 18:00	SVS
Bicarbonate	581	mg/l CaCO3	20	SM2320-B	26 Sep 18 18:00	SVS
Carbonate	73	mg/l CaCO3	20	SM2320-B	26 Sep 18 18:00	SVS
Hydroxide	< 20	mg/l CaCO3	20	SM2320-B	26 Sep 18 18:00	SVS
Conductivity - Field	1681	umhos/cm	1	EPA 120.1	25 Sep 18 10:41	DJN
Tot Dis Solids (Summation)	1010	mg/l	12.5	SM1030-F	3 Oct 18 12:23	Calculated
Total Hardness as CaCO3	13.3	mg/l	NA	SM2340-B	3 Oct 18 11:42	Calculated
Cation Summation	18.2	meq/L	NA	SM1030-F	5 Oct 18 10:46	Calculated
Anion Summation	17.3	meq/L	NA	SM1030-F	3 Oct 18 12:23	Calculated
Percent Error	2.40	%	NA	SM1030-F	5 Oct 18 10:46	Calculated
Fluoride	0.95	mg/l	0.10	SM4500-F-C	26 Sep 18 18:00	SVS
Sulfate	200	mg/l	5.00	ASTM D516-07	26 Sep 18 16:04	EMS
Chloride	2.3	mg/l	1.0	SM4500-Cl-E	28 Sep 18 15:33	RAG
Nitrate-Nitrite as N	< 0.1	mg/l	0.10	EPA 353.2	3 Oct 18 12:23	EV
Phosphorus as P - Total	0.17	mg/l	0.10	EPA 365.1	27 Sep 18 14:00	EMS
Mercury - Dissolved	< 0.0002	mg/l	0.0002	EPA 245.1	28 Sep 18 13:16	EV
Calcium - Total	3.2	mg/l	1.0	6010D	3 Oct 18 11:42	BB
Magnesium - Total	1.3	mg/l	1.0	6010D	3 Oct 18 11:42	BB
Sodium - Total	410	mg/l	1.0	6010D	3 Oct 18 11:42	BB
Potassium - Total	2.4	mg/l	1.0	6010D	3 Oct 18 11:42	BB
Iron - Dissolved	< 0.1	mg/l	0.10	6010D	5 Oct 18 10:46	SZ
Manganese - Dissolved	< 0.05	mg/l	0.05	6010D	5 Oct 18 10:46	SZ
Boron - Dissolved	0.38	mg/l	0.10	6010D	2 Oct 18 16:33	SZ
Arsenic - Dissolved	< 0.002	mg/l	0.0020	6020B	26 Sep 18 21:07	BB
Barium - Dissolved	0.0142	mg/l	0.0020	6020B	26 Sep 18 21:07	BB
Cadmium - Dissolved	< 0.0005	mg/l	0.0005	6020B	27 Sep 18 18:24	CC
Chromium - Dissolved	< 0.002	mg/l	0.0020	6020B	26 Sep 18 21:07	BB
Lead - Dissolved	< 0.0005	mg/l	0.0005	6020B	26 Sep 18 21:07	BB

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

@ = Due to sample matrix # = Due to concentration of other analytes
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CERTIFICATION: ND # ND-00016



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CERTIFICATE of ANALYSIS - STATE

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 5 Oct 18
Lab Number: 18-W3110
Work Order #: 82-2513
Account #: 007048
Date Sampled: 25 Sep 18 10:41
Date Received: 25 Sep 18 15:49
Sampled By: MVTl Field Services

Project Name: Minnkota-CCWDF

PO #: 180247

Sample Description: 92-6A

Temp at Receipt: 2.1C

Event and Year: Sept 2018

	As Received Result		Method RL	Method Reference	Date Analyzed	Analyst
Molybdenum - Dissolved	< 0.002 mg/l		0.0020	6020B	27 Sep 18 18:24	BB
Selenium - Dissolved	< 0.005 mg/l		0.0050	6020B	27 Sep 18 18:16	CC
Silver - Dissolved	< 0.0005 mg/l		0.0005	6020B	27 Sep 18 18:24	BB

* Holding time exceeded

Approved by:

Claudette K Carroll

*CC
10 OCT 18*

Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

- = Due to sample matrix
- ! = Due to sample quantity
- # = Due to concentration of other analytes
- * = Due to internal standard response

CERTIFICATION: ND # ND-00016



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Page: 8 of 10

CERTIFICATE of ANALYSIS - STATE

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 5 Oct 18
Lab Number: 18-W3111
Work Order #: 82-2513
Account #: 007048
Date Sampled: 25 Sep 18 13:07
Date Received: 25 Sep 18 15:49
Sampled By: MVTl Field Services

Project Name: Minnkota-CCWDF

PO #: 180247

Sample Description: 92-3

Temp at Receipt: 2.1C

Event and Year: Sept 2018

Table with 6 columns: Analyte, As Received Result, Method RL, Method Reference, Date Analyzed, Analyst. Rows include Molybdenum, Selenium, and Silver.

* Holding time exceeded

Approved by:

Claudette K. Carroll

CC
10 OCT 18

Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

- = Due to sample matrix
! = Due to sample quantity
= Due to concentration of other analytes
+ = Due to internal standard response

CERTIFICATION: ND # ND-00016



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CERTIFICATE of ANALYSIS - STATE

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 5 Oct 18
Lab Number: 18-W3112
Work Order #: 82-2513
Account #: 007048
Date Sampled: 25 Sep 18 14:50
Date Received: 25 Sep 18 15:49
Sampled By: MVTl Field Services

Project Name: Minnkota-CCWDF

Sample Description: 95-4

PO #: 180247

Event and Year: Sept 2018

Temp at Receipt: 2.1C

Table with 6 columns: Analyte, As Received Result, Method RL, Method Reference, Date Analyzed, Analyst. Rows include Molybdenum, Selenium, and Silver.

* Holding time exceeded

Approved by:

Claudette K. Carroll

CC
10 OCT 18

Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

- @ = Due to sample matrix
! = Due to sample quantity
= Due to concentration of other analytes
+ = Due to internal standard response

CERTIFICATION: ND # ND-00016



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CERTIFICATE of ANALYSIS - STATE

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 6 Jun 18
Lab Number: 18-W1293
Work Order #: 82-1116
Account #: 007048
Date Sampled: 22 May 18 13:07
Date Received: 24 May 18 8:00
Sampled By: MVTl Field Services

Project Name: Minnkota-CCWDF

PO #: 180247

Sample Description: 97-1

Temp at Receipt: 3.9C

Event and Year: May 2018

	As Received Result	Method RL	Method Reference	Date Analyzed	Analyst
Molybdenum - Dissolved	< 0.002 mg/l	0.0020	6020B	30 May 18 17:07	CC
Selenium - Dissolved	< 0.005 mg/l	0.0050	6020B	29 May 18 17:35	CC
Silver - Dissolved	< 0.0005 mg/l	0.0005	6020B	29 May 18 17:35	CC

* Holding time exceeded

Approved by:

Claudette K Carroll

16 Jun 18

Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

- ⊙ = Due to sample matrix
- ! = Due to sample quantity
- # = Due to concentration of other analytes
- + = Due to internal standard response

CERTIFICATION: ND # ND-00016



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CERTIFICATE of ANALYSIS - STATE

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 6 Jun 18
Lab Number: 18-W1294
Work Order #: 82-1116
Account #: 007048
Date Sampled: 23 May 18 12:40
Date Received: 24 May 18 8:00
Sampled By: MVTl Field Services

Project Name: Minnkota-CCWDF

PO #: 180247

Sample Description: 92-5A

Temp at Receipt: 3.9C

Event and Year: May 2018

Table with 6 columns: Analyte, As Received Result, Method RL, Method Reference, Date Analyzed, Analyst. Rows include Molybdenum - Dissolved, Selenium - Dissolved, and Silver - Dissolved.

* Holding time exceeded

Approved by: Claudette K. Carroll (signature) 16 Jun 18 (handwritten)
Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit
The reporting limit was elevated for any analyte requiring a dilution as coded below:
@ = Due to sample matrix * = Due to concentration of other analytes
! = Due to sample quantity + = Due to internal standard response
CERTIFICATION: ND # ND-00016



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CERTIFICATE of ANALYSIS - STATE

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 6 Jun 18
Lab Number: 18-W1295
Work Order #: 82-1116
Account #: 007048
Date Sampled: 22 May 18 15:11
Date Received: 24 May 18 8:00
Sampled By: MVTL Field Services

Project Name: Minnkota-CCWDF

PO #: 180247

Sample Description: 92-6A

Temp at Receipt: 3.9C

Event and Year: May 2018

Table with columns: As Received Result, Method RL, Method Reference, Date Analyzed, Analyst. Rows include various chemical and physical tests like Metal Digestion, Total Suspended Solids, Conductivity, pH, Temperature, etc.

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:
@ = Due to sample matrix # = Due to concentration of other analytes
! = Due to sample quantity + = Due to internal standard response

CERTIFICATION: ND # ND-00016



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CERTIFICATE of ANALYSIS - STATE

Scott Hopfauf
Minnkota Power Cooperative
3401 24th St SW
Center ND 58530

Report Date: 6 Jun 18
Lab Number: 18-W1297
Work Order #: 82-1116
Account #: 007048
Date Sampled: 23 May 18 14:26
Date Received: 24 May 18 8:00
Sampled By: MVTL Field Services

Project Name: Minnkota-CCWDF

PO #: 180247

Sample Description: 95-4

Temp at Receipt: 3.9C

Event and Year: May 2018

Table with 6 columns: Analyte, As Received Result, Method RL, Method Reference, Date Analyzed, Analyst. Rows include Molybdenum, Selenium, and Silver.

* Holding time exceeded

Approved by:

Claudette K Carroll

CC
16 Jun 18

Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL - Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

- @ = Due to sample matrix
! = Due to sample quantity
= Due to concentration of other analytes
+ = Due to internal standard response

CERTIFICATION: ND # ND-00016

APPENDIX C-3

**FOX HILLS OBSERVATION WELL 3558
ANALYSES
FOR BASELINE DATA**

MINNESOTA VALLEY TESTING LABORATORIES, INC.

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MEMBER
ACIL

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Page: 1 of 4

Amended 2Feb21 (TDS)

Barry Botnen
UND-Energy & Environmental
15 N. 23rd St.
Grand Forks ND 58201

Report Date: 28 Jan 21
Lab Number: 21-W40
Work Order #: 82-0072
Account #: 007033
Date Sampled: 12 Jan 21 12:45
Date Received: 12 Jan 21 14:35
Sampled By: MVTL Field Services

Project Name: Center USGS Well

PO #: B. Botnen

Sample Description: USGS Well

Temp at Receipt: 8.9C ROI

	As Received Result		Method RL	Method Reference	Date Analyzed	Analyst
Metal Digestion				EPA 200.2	12 Jan 21	HT
pH - Field	8.42	units	NA	SM 4500 H+ B	12 Jan 21 12:45	JSM
Temperature - Field	11.8	Degrees C	NA	SM 2550B	12 Jan 21 12:45	JSM
Total Alkalinity	938	mg/l CaCO3	20	SM2320B-11	12 Jan 21 17:00	HT
Phenolphthalein Alk	< 20	mg/l CaCO3	20	SM2320B-11	12 Jan 21 17:00	HT
Bicarbonate	912	mg/l CaCO3	20	SM2320B-11	12 Jan 21 17:00	HT
Carbonate	26	mg/l CaCO3	20	SM2320B-11	12 Jan 21 17:00	HT
Hydroxide	< 20	mg/l CaCO3	20	SM2320B-11	12 Jan 21 17:00	HT
Conductivity - Field	2641	umhos/cm	1	EPA 120.1	12 Jan 21 12:45	JSM
Tot Dis Solids(Summation)	1520	mg/l	12.5	SM1030-F	15 Jan 21 11:45	Calculated
Nitrate as N	< 0.2	mg/l	NA	EPA 353.2	14 Jan 21 9:17	Calculated
Bromide	2.83	mg/l	0.100	EPA 300.0	14 Jan 21 22:24	RMV
Total Organic Carbon	1.7	mg/l	0.5	SM5310C-11	22 Jan 21 17:28	NAS
Dissolved Organic Carbon	1.7	mg/l	0.5	SM5310C-96	22 Jan 21 17:28	NAS
Fluoride	3.54	mg/l	0.10	SM4500-F-C	12 Jan 21 17:00	HT
Sulfate	< 5	mg/l	10.0	ASTM D516-11	15 Jan 21 8:50	EV
Chloride	323	mg/l	2.0	SM4500-Cl-E-11	13 Jan 21 11:25	EV
Nitrate-Nitrite as N	< 0.2	mg/l	0.20	EPA 353.2	14 Jan 21 9:17	EV
Nitrite as N	< 0.2	mg/l	0.20	EPA 353.2	14 Jan 21 7:59	EV
Phosphorus as P - Total	< 0.2	mg/l	0.20	EPA 365.1	15 Jan 21 8:17	EV
Phosphorus as P-Dissolved	< 0.2	mg/l	0.20	EPA 365.1	15 Jan 21 8:17	EV
Mercury - Total	< 0.0002	mg/l	0.0002	EPA 245.1	13 Jan 21 11:16	MDE
Mercury - Dissolved	< 0.0002	mg/l	0.0002	EPA 245.1	13 Jan 21 11:16	MDE

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

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! = Due to sample quantity + = Due to internal standard response

CERTIFICATION: ND # ND-00016

MINNESOTA VALLEY TESTING LABORATORIES, INC.

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Amended 2Feb21 (TDS)

Barry Botnen
UND-Energy & Environmental
15 N. 23rd St.
Grand Forks ND 58201

Report Date: 28 Jan 21
Lab Number: 21-W40
Work Order #: 82-0072
Account #: 007033
Date Sampled: 12 Jan 21 12:45
Date Received: 12 Jan 21 14:35
Sampled By: MVTL Field Services

Project Name: Center USGS Well

PO #: B. Botnen

Sample Description: USGS Well

Temp at Receipt: 8.9C ROI

	As Received Result		Method RL	Method Reference	Date Analyzed	Analyst
Calcium - Total	4.0	mg/l	1.0	6010D	15 Jan 21 11:45	MDE
Magnesium - Total	< 1	mg/l	1.0	6010D	15 Jan 21 11:45	MDE
Sodium - Total	630	mg/l	1.0	6010D	15 Jan 21 11:45	MDE
Potassium - Total	2.8	mg/l	1.0	6010D	15 Jan 21 11:45	MDE
Lithium - Total	0.186	mg/l	0.020	6010D	21 Jan 21 15:22	MDE
Aluminum - Total	< 0.1	mg/l	0.10	6010D	20 Jan 21 10:36	MDE
Iron - Total	0.40	mg/l	0.10	6010D	20 Jan 21 10:36	MDE
Silicon - Total	5.04	mg/l	0.10	6010D	26 Jan 21 9:37	MDE
Strontium - Total	0.16	mg/l	0.10	6010D	20 Jan 21 10:36	MDE
Zinc - Total	< 0.05	mg/l	0.05	6010D	20 Jan 21 10:36	MDE
Boron - Total	2.87	mg/l	0.10	6010D	26 Jan 21 10:46	MDE
Calcium - Dissolved	3.7	mg/l	1.0	6010D	15 Jan 21 9:45	MDE
Magnesium - Dissolved	< 1	mg/l	1.0	6010D	15 Jan 21 9:45	MDE
Sodium - Dissolved	670	mg/l	1.0	6010D	15 Jan 21 9:45	MDE
Potassium - Dissolved	3.2	mg/l	1.0	6010D	15 Jan 21 9:45	MDE
Lithium - Dissolved	0.102	mg/l	0.020	6010D	21 Jan 21 15:22	MDE
Aluminum - Dissolved	< 0.1	mg/l	0.10	6010D	20 Jan 21 9:36	MDE
Iron - Dissolved	0.25	mg/l	0.10	6010D	20 Jan 21 9:36	MDE
Silicon - Dissolved	5.12	mg/l	0.10	6010D	26 Jan 21 9:37	MDE
Strontium - Dissolved	0.15	mg/l	0.10	6010D	20 Jan 21 9:36	MDE
Zinc - Dissolved	< 0.05	mg/l	0.05	6010D	20 Jan 21 9:36	MDE
Boron - Dissolved	2.85	mg/l	0.10	6010D	26 Jan 21 10:46	MDE
Antimony - Total	< 0.001	mg/l	0.0010	6020B	14 Jan 21 19:47	MDE

RL = Method Reporting Limit

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Amended 2Feb21 (TDS)

Barry Botnen
UND-Energy & Environmental
15 N. 23rd St.
Grand Forks ND 58201

Report Date: 28 Jan 21
Lab Number: 21-W40
Work Order #: 82-0072
Account #: 007033
Date Sampled: 12 Jan 21 12:45
Date Received: 12 Jan 21 14:35
Sampled By: MVTL Field Services

Project Name: Center USGS Well

PO #: B. Botnen

Sample Description: USGS Well

Temp at Receipt: 8.9C ROI

	As Received Result		Method RL	Method Reference	Date Analyzed	Analyst
Arsenic - Total	< 0.002	mg/l	0.0020	6020B	14 Jan 21 19:47	MDE
Barium - Total	0.0966	mg/l	0.0020	6020B	14 Jan 21 19:47	MDE
Beryllium - Total	< 0.0005	mg/l	0.0005	6020B	14 Jan 21 19:47	MDE
Cadmium - Total	< 0.0005	mg/l	0.0005	6020B	14 Jan 21 19:47	MDE
Chromium - Total	< 0.002	mg/l	0.0020	6020B	14 Jan 21 19:47	MDE
Cobalt - Total	< 0.002	mg/l	0.0020	6020B	14 Jan 21 19:47	MDE
Copper - Total	< 0.002	mg/l	0.0020	6020B	14 Jan 21 19:47	MDE
Lead - Total	0.0006	mg/l	0.0005	6020B	14 Jan 21 19:47	MDE
Manganese - Total	0.0088	mg/l	0.0020	6020B	14 Jan 21 19:47	MDE
Molybdenum - Total	0.0058	mg/l	0.0020	6020B	14 Jan 21 19:47	MDE
Nickel - Total	< 0.002	mg/l	0.0020	6020B	14 Jan 21 19:47	MDE
Selenium - Total	< 0.005	mg/l	0.0050	6020B	14 Jan 21 19:47	MDE
Silver - Total	< 0.0005	mg/l	0.0005	6020B	14 Jan 21 19:47	MDE
Thallium - Total	< 0.0005	mg/l	0.0005	6020B	14 Jan 21 19:47	MDE
Vanadium - Total	< 0.002	mg/l	0.0020	6020B	14 Jan 21 19:47	MDE
Antimony - Dissolved	< 0.001	mg/l	0.0010	6020B	15 Jan 21 14:56	MDE
Arsenic - Dissolved	< 0.002	mg/l	0.0020	6020B	15 Jan 21 14:56	MDE
Barium - Dissolved	0.0954	mg/l	0.0020	6020B	15 Jan 21 14:56	MDE
Beryllium - Dissolved	< 0.0005	mg/l	0.0005	6020B	15 Jan 21 14:56	MDE
Cadmium - Dissolved	< 0.0005	mg/l	0.0005	6020B	15 Jan 21 14:56	MDE
Chromium - Dissolved	< 0.002	mg/l	0.0020	6020B	15 Jan 21 14:56	MDE
Cobalt - Dissolved	< 0.002	mg/l	0.0020	6020B	15 Jan 21 14:56	MDE
Copper - Dissolved	< 0.002	mg/l	0.0020	6020B	15 Jan 21 14:56	MDE

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:

@ = Due to sample matrix # = Due to concentration of other analytes
! = Due to sample quantity + = Due to internal standard response

CERTIFICATION: ND # ND-00016

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MEMBER ACIL

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Amended 2Feb21 (TDS)

Barry Botnen
UND-Energy & Environmental
15 N. 23rd St.
Grand Forks ND 58201

Report Date: 28 Jan 21
Lab Number: 21-W40
Work Order #: 82-0072
Account #: 007033
Date Sampled: 12 Jan 21 12:45
Date Received: 12 Jan 21 14:35
Sampled By: MVTL Field Services

Project Name: Center USGS Well

PO #: B. Botnen

Sample Description: USGS Well

Temp at Receipt: 8.9C ROI

Table with 6 columns: Analyte, As Received Result, Method RL, Method Reference, Date Analyzed, Analyst. Rows include Lead, Manganese, Molybdenum, Nickel, Selenium, Silver, Thallium, and Vanadium.

^ Elevated result due to instrument performance at the lower limit of quantification (LLOQ).

Approved by: Claudette K. Carroll

Claudette K. Carroll, Laboratory Manager, Bismarck, ND

RL = Method Reporting Limit

The reporting limit was elevated for any analyte requiring a dilution as coded below:
@ = Due to sample matrix # = Due to concentration of other analytes
! = Due to sample quantity + = Due to internal standard response

CERTIFICATION: ND # ND-00016

APPENDIX D

TESTING AND MONITORING – QUALITY CONTROL AND SURVEILLANCE PLAN

TESTING AND MONITORING – QUALITY CONTROL AND SURVEILLANCE PLAN Tundra SGS (Secure Geological Storage)

1. PROJECT MANAGEMENT AND SURVEILLANCE PROCESS

From conception to closure, Tundra SGS operation will include the participation of multidisciplinary teams of government representatives, researchers, operator staff, consultants, and subcontractors. Each of these teams are highly specialized and recognized in their specific areas of expertise, providing technical and economic inputs to the project in order to ensure a safe, successful, and efficient operation.

Characterization of the reservoirs, seals, and subsurface features has been done by experienced professionals in geosciences from the Energy & Environmental Research Center (EERC), Oxy Low Carbon Ventures (OLCV), Schlumberger, etc., led by Minnkota Power Cooperative, Inc., applying the latest technology in logging and testing equipment as well as industry recognized software and techniques for modeling and simulations.

The main flowline, surface equipment, and well designs comply with industry standards for carbon dioxide (CO₂) material selection and operating conditions to guaranty mechanical integrity of the system during the life of the project and have been prepared by specialized companies such as Burns & McDonnell and OLCV.

Monitoring programs for leak detection, corrosion, and surveillance have been tailored for the site to ensure protection of underground sources of drinking water (USDWs), the environment, and communities; ensure the mechanical integrity of storage; maximize operating time; and extend the life of the assets. These plans incorporate best practices and recommendation for carbon capture and storage projects worldwide as well as the experience of years of development in enhanced oil recovery (EOR) fields.

As part of the quality control (QC) process, during testing and surveillance, most of the samples collected and data gathered will be analyzed, processed, validated, or witnessed by third parties independent and outside of the operator staff.

For specialized data such as seismicity and distributed temperature sensing (DTS), the project will have additional support from the provider of the selected technologies to perform QC and verification of the data as well as calibration of the systems as needed.

Sensors, transducers and controllers will be connected in a central platform (supervisory control and data acquisition [SCADA] system) to monitor the operating conditions, set alarms for malfunction, and establish safety protocols in case of abnormal conditions in the system. Data interfaces will be created for equipment that is not linked directly to the SCADA system, to be integrated in a unique surveillance platform.

The operating parameters, monitoring values, laboratory results, reports, and surveillance documents for the project will be stored in a central database to provide support for area of review (AOR) reviews, quality assurance (QA) programs, and reporting.

The project established a key staffing position that will ensure reliable operation with the highest standard of quality and surveillance procedures as well as accurate storage evaluation and reporting. Some of the staff will be dedicated full time to the operation, and others will be as required by AOR reviews, maintenance activities, or specific activities of the project.

Once the project is in operation, the Tundra SGS operator will maintain a contact list with the specific names of the individuals in each position and will keep that list updated.

1.1 Operator Organizational Chart

Figure D-1 shows the operator organizational chart for Tundra SGS.

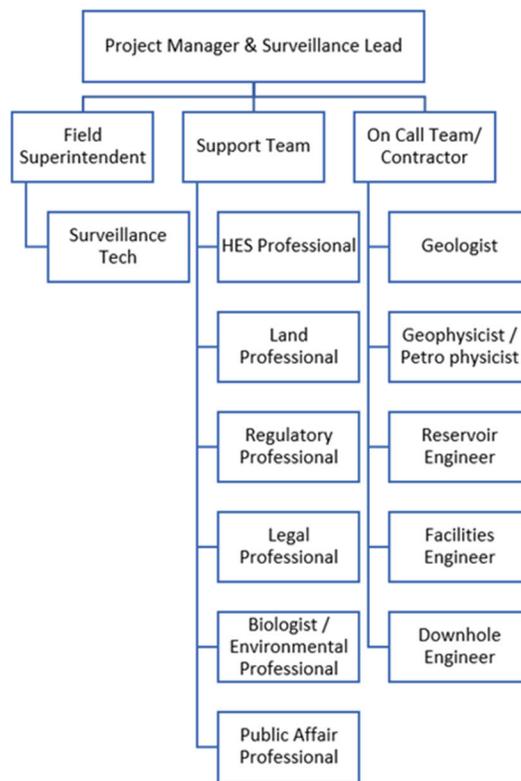


Figure D-1. Operator organizational chart.

A brief description of full-time positions is as follows:

- **Project Manager:** The project manager (PM) plays a central role in the implementation of all data gathering and analysis for the Tundra SGS project and provides overall coordination and responsibility for all organizational and administrative aspects. The PM is responsible for the planning, funding, schedules, and controls needed to implement project plans. The PM is responsible to enforce the data validation process and perform surveillance on the site.
- **Field Superintendent:** The field superintendent (FS) is responsible to ensure operating procedures are followed and any deviation from set parameters is corrected. The FS is responsible to verify surveillance is being performed and data are being communicated and reported properly. The FS is responsible to ensure all personnel comply with the safety worker plan and policies of the operator. The FS is the focal point for activation of the emergency response and remedial plan. The FS is responsible to coordinate personnel and contractors on the site.
- **Surveillance Technician:** The surveillance technician (ST) is responsible for the surveillance of the system on the field. The position is 24/7 and requires an experience SCADA operator to monitor the sequestration complex, clear alarms, and troubleshoot deviation from normal operation.

Additional to the key staffing positions and specialized consultants identified in the above sections, the project will have the support of additional subcontractors based on the scope of the work to be performed.

1.2 Data Verification and Validation

The project will establish a standardized program to validate the data and acquisition methods. The program will verify that collected data are reasonable, were processed and analyzed correctly, and are free of errors. Peer reviews or third-party consultant will be used as a QC mechanism to verify the information. If issues are identified during a peer review, they will be addressed and corrected by the data owner. If an error is identified in data under validation, in addition to correcting the error, affected work products and management decisions will be identified, affected users will be notified, and corrective actions will be coordinated to ensure that the extent of the error's impact is fully addressed.

1.3 Management of Change (MOC)

The project will implement a MOC procedure to communicate and document any deviation from facilities designs, policies, operational parameters, standard operating procedures, etc. The MOC procedure aims to control major deviations in cost.

1.4 Contractor Requirements

Each contractor will follow a qualification process defined by the operator, before being authorized to execute work in the site. Each contractor providing service to Tundra SGS must provide a copy of its QA/QC and safety management program before it is qualified to perform the work and might be audited by the operator's subject matter experts. All contractors are required to comply with the

Worker Safety Program described in this permit as well as the operator's policies at the working site. The operator reserves the right to inspect and audit contractors' operation and quality program to guaranty safety and quality programs are being followed.

1.5 Special Training/Certifications

Wireline logging, indirect geophysical methods, and some nonroutine sampling will be performed by trained, qualified, and certified personnel, according to the service company's requirements.

Routine injectate and groundwater sampling will be performed by trained personnel; no specialized certifications are required. Some special training will be required for project personnel, particularly in the areas of pulsed-neutron capture (PNC) logging interpretation, certain geophysical methods, certain data acquisition/transmission systems, and certain sampling technologies.

Training of project staff will be conducted by existing project personnel knowledgeable in project-specific sampling procedures. Training documentation will be maintained as project QA records.

1.6 Documentation, Records and Reporting

All data and project records will be stored electronically on secure servers and routinely backed up. Reporting will comply with North Dakota Administrative Code (NDAC) § 43-05-01-18.

2. TESTING AND MONITORING TECHNIQUES QA/QC

2.1 Logging Program

The logging program is described in detailed in the testing and monitoring section of the permit. These activities are executed by specialized contractors with proven technology in the oil and gas industry. Calibration and QC of the tools will follow specific protocols and procedures based on the provider. Example of data sheets for the different formation evaluation tools are included in the Appendix D-1 of this document as reference only.

2.1.1 Ultrasonic Casing Inspection Tool, Isolation Scanner, and Electromagnetic Pipe Examiner

For mechanical integrity evaluation, the Tundra SGS monitoring program proposed ultrasonic and electromagnetic tools that evaluate the conditions of the tubulars in the well and provide information about thickness, ovality, ruptures, potential corrosion, etc. Table D-1 provides basic data for each tool.

2.1.2 Pulsed-Neutron Logging

Pulsed-neutron logging is considered a proven technique to detect gas saturation in reservoirs. Advances in the technology have improved the accuracy of the tool to track the movement of the CO₂ plumes in the reservoir and evaluate flow conformance. Table D-2 shows basic specifications of the tools based on the provider.

Table D-1. Types of Data Provided by Individual Tools

Logging Type	Isolation Scanner	USIT	EM Pipe Xaminer	EM Pipe Scanner	CAST-XR
Acquisition	Real time	Real time	Real time	Real time	Real time
Logging Speed	2,700 ft/h	1800 ft/h	900 ft/h	1,800–3,600 ft/h	3,600 ft/h
Thickness Measurement Accuracy				EM thickness 15%	± 0.05 in.
Range of Measurement	0 to 10 Mrayl	0 to 10 Mrayl		1.5 in.	0–10 Mrayl
Mud Type Limitations	None	None	None	None	None
Temperature Rating	350°F	350°F	350°F	302°F	350°F
Pressure Rating	20,000 psi	20,000 psi	15,000 psi	15,000 psi	20,000 psi
Casing Size Min.	4 ½ in.	4½ in.	2.38 in.	2⅞ in.	4.67 in.
Casing Size Max.	9⅞ in.	13⅜ in.	24 in.	13⅜ in.	20 in.
Outside Diameter	3.37 in.	3.375 in.	1.69 in.	2.125 in.	3.625 in.
Length	19.73 ft	19.75 in.	17.34 ft	19.7 ft	17.9 ft
Weight	333 lb	333 lb	87 lb	110 lb	316 lb
1st Pipe Defect Detection Accuracy			1%	± 0.05 in	
1st Pipe (2Cs) Accuracy			2% or 0.015 in		
Total Metal Thickness 1.2 In (3Cs) Overall Average			7%		
Total Metal Thickness 1.8 In (4Cs) Overall Average			10%		

Table D-2. Data Specifications for the Pulsed-Neutron Logging Tool

Logging Type	Pulsar¹ – Neutron	TMD3D² Pulse Neutron
Acquisition	Real time	Real time
Logging Speed	200–3,600 ft/h	60–1,800 ft/h
Depth of Investigation		10–14 in.
Vertical Resolution		24 in.
Range of Measurement	0 to 60 pu	5 to 60 pu
Mud Type Limitations	None	None
Temperature Rating	350°F	300°F
Pressure Rating	15,000 psi	15,000 psi
Casing Size Min.	2⅜ in.	2 in.
Casing Size Max.	9⅞ in.	16 in.
Outside Diameter	1.72 in.	1.69 in.
Length	18.3 ft	14.25 ft
Weight	88 lb	35 lb

¹ Pulsar – Schlumberger technology.² TMD3D – Halliburton technology.

2.2 Mud-Logging Sampling

Mud-logging samples must be collected from surface to final total depth (TD), every 30 ft maximum. The samples must be washed, dried, and placed in standard envelopes, and packed in the correct order into standard sample boxes. The sample boxes must be identified with a label indicating operator, well name, well file number, API number, and location and depth of samples and forwarded to the state core and sample library within 30 days of the completion of drilling operations.

2.3 Coring or Sidewall Coring (SWC) Sampling

The coring program is described in detailed in the specific drilling and completion program of the wells. The coring provider must provide tools in good condition and according to the program discussed with the technical team. Operators reserve the right to inspect the tools and request a replacement if substandard conditions are detected. The coring provider must provide the tools to cut, retrieve, and stabilize the core to get the maximum possible recovery factor. All cores or SWCs taken shall be preserved, placed in a standard core box, and the entire core forwarded to the state core and sample library, free of cost, within 180 days after completion of drilling operations.

2.4 MDT In Situ Stress Testing

The Schlumberger MDT (modular dynamics testing) tool delivers real-time formation temperature and pressure measurements and fluid sampling. The tools for formation pressure measurements incorporate a wireline-conveyed tester with a dual packer module, with two probes for pressure measurements, pumps, a flow control module, and sample chambers (Appendix D-2). Reservoir pressure measurements require inserting a probe into the reservoir and withdrawing a small amount of fluid. The pressure gauge is exposed to many temperature and pressure changes and has high resolution to accurately measure the dynamic conditions. Precise flowline control during testing and sampling ensures monophasic flow, delivering accurate permeability. In situ reservoir stress testing measurements provide formation breakdown, propagation, and closure pressures.

The dual-packer module (MRPA) is used to isolate formation intervals to provide enhanced data because the cross-sectional area of the isolated interval is greater than the standard MDT probe. This small interval lowers the wellbore storage effects. The MRPA is used to take pressure measurements and fluid samples in unconsolidated formations.

The MDT tool allows the measurements of the in situ reservoir stresses without breaking into confining zones. The tool creates a controlled fracture in the isolated zone and measures the related pressure response. The created fracture plane is perpendicular to the direction of the minimum in situ stress. The fracture is reopened and closed for measurement repeatability, with several constant rate injection cycles. The repeated cycles assist the fracture to grow beyond hoop stresses to sense far-field stresses accurately.

MDT interpretation software provides real-time plotting of pressure, resistivity, and optical properties versus time. This capability is essential for real-time QC and ongoing optimization of the job. Using the InterACT* wellsite-monitoring and control system provides real-time data transfer to remote sites.

2.4.1 Tool Limitations

Schlumberger's dual-packer mechanical specifications were set with a maximum differential pressure between the upper packer and the hydrostatic pressure of 5500 psi (Appendix D-3). This limited the maximum injection pressure during the microfracture stress tests in the formations, which caused certain tests to be unsuccessful.

2.5 Formation Pressure and Fluid Sampling

The self-sealing Saturn * 3D radial probe delivers circumferential flow in the formation around the wellbore to obtain representative formation fluid samples and provides downhole fluid analysis and complete pressure surveys (Appendix D-4). In the water-based mud environment, the MDT flowline resistivity measurement helps discriminate between fluid contaminated by mud filtrate and formation oil or freshwater. Formation pressure testing similarly requires fluid withdrawal.

2.6 Analysis of Injected CO₂

The CO₂ injection stream will be continuously monitored at the surface for pressure, temperature, and flow as part of the instrumentation and control systems of the site. Quarterly samples will be collected and analyzed to track CO₂ composition and purity. Based on the anticipated composition of the CO₂ stream, a list of parameters has been identified for analysis.

Additional to the parameters listed in Table D-3, isotopic signatures of the CO₂ stream will be analyzed as baseline for potential use in monitoring techniques.

Table D-3. CO₂ Stream Analysis

Parameter	Frequency
Pressure, psi	Continuous
Temperature, °F	Continuous
CO ₂ , %	Quarterly
Water, ppm	Quarterly
Nitrogen, ppm	Quarterly
Oxygen, ppm	Quarterly
Argon, ppm	Quarterly
Hydrogen, %	Quarterly
Sulfur Dioxide SO ₂ , ppm	Quarterly
Nitrogen Dioxide NO ₂ , ppm	Quarterly
Nitric Oxide NO, ppm	Quarterly
Hydrogen Sulfide, ppm	Quarterly

2.6.1 Sampling and Custody

CO₂ sampling will be performed upstream or downstream of the flowmeter. Sampling procedures will follow contractor protocols to ensure the sample is representative of the injectant, and samples will be processed, packaged, and shipped to the contracted laboratory following standard sample handling and chain-of-custody guidance (U.S. Environmental Protection Agency [EPA] 540-R-09-03 or equivalent). Sampling tubing, connectors and valves required to sample the CO₂ gas stream will be supplied by the analytical lab providing the sampling containers.

Once the samples are analyzed, the laboratory will be responsible of properly disposed containers and residues.

2.6.2 Equipment and Calibration

For sampling, field equipment will be maintained, serviced, and calibrated in accordance with manufacturer recommendations. Spare parts that may be needed during sampling will be included in supplies on hand during field sampling. For all laboratory equipment, testing, inspection, and maintenance will be the responsibility of the analytical laboratory in accordance with method-specific protocols and the laboratory’s QA program. The Tundra SGS operator reserve the right to audit the protocols and methods of the selected laboratory prior to awarding the work.

Calibration of all laboratory instrumentation/equipment will be the responsibility of the analytical laboratory in accordance with method-specific protocols and the laboratory’s QA program, which will be reviewed by the alliance prior to contract award.

2.6.3 Personnel and Training

Sampling will be performed by trained personnel from the laboratory at the beginning of the operation, and the field staff will be trained in the procedures and protocols to take the samples.

2.6.4 Analytical Method

Table D-4 shows analytical parameters and methods.

Table D-4. Example Analytical Parameters and Methods

Analytical Parameter	Analytical Method	Detection Limit	Typical Precision/Accuracy
CO ₂	GC/TCD ¹	1 ppm to 100%	± 1% of full scale
Water	GC/HID ²	1 ppm to 100%	± 10%
Nitrogen	GC/TCD	1 ppm to 100%	± 1% of full scale
Oxygen	GC/TCD	1 ppm to 100%	± 1% of full scale
Argon	GC/TCD	1 ppm to 100%	± 1% of full scale
Hydrogen	GC/TCD	1 ppm to 100%	± 1% of full scale
Sulfur Dioxide	GC/FPD ³	0 to 500 (ppmv)	± 2% of full scale
Nitrogen Dioxide	Colorimetric	0.2 to 5 µL/L (ppmv)	± 20%
Nitric Oxide	Colorimetric	0.2 to 5 µL/L (ppmv)	± 20%
Hydrogen Sulfide	GC/FPD	0 to 500 ppm	± 2% of full scale

¹ GC/TCD – gas chromatography with a thermal conductivity detector.

² GC/HID – gas chromatography with helium ionization detector.

³ GC/FDP – gas chromatography with flame photometric detector.

Additional to compositional gas, the samples will be analyzed during the baseline period to identify the isotopes in Table D-5.

Table D-5. Isotopes to Be Identified During Baseline Sampling

Hydrocarbons	Method
$\delta^{13}\text{C}$ and ^{14}C of CO_2	GC-IRMS, AMS for ^{14}C

GC-IRMS, AMS = gas chromatography-isotope-ratio mass spectrometry/accelerator mass spectrometry.

2.6.4 Quality Control

If CO_2 composition shows abnormal values during the testing period, the project will perform a validation of the sampling process. A new sample will be collected by the laboratory technician and sent to the testing facilities for verification.

2.7 Corrosion Coupons

Samples of injection well materials (coupons) will be monitored for signs of corrosion to verify that the well components meet the minimum standards for material strength and performance and to identify well maintenance needs. Coupons shall be collected and sent quarterly to a third-party company for analysis conducted in accordance with NACE (National Institute of Corrosion Engineers) Standard SP-0775-2018-SG to determine and document corrosion wear rates based on mass loss.

2.7.1 Sampling and Custody

Prior to installation of the corrosion-monitoring flow-through corrosion coupon test system, the following information should be recorded: coupon serial number, installation date, identification (ID) of the location in the system, and orientation of the coupon and holder. The coupon should be handled carefully to avoid contamination.

The field operator will collect the coupons and identify them by serial number, date, company name, ID of the location, ID of where the coupon was removed from, and the field operator name. The field operator will visually inspect the coupon for signs of erosion, pitting, scale, or other damage and take a photograph before packing the sample. The coupon will be protected from contamination by oxidation and handling, placing the coupon in a moisture-proof or special envelope impregnated with volatile corrosion inhibitor, and shipped immediately to the laboratory for analysis.

There is no special training required to collect the coupons; however, the field operator will be trained in best practices to keep the coupon for contamination, and process refreshers will be provided as part of the continuous training process.

2.7.2 Equipment and Calibration

The preparation, cleaning, and evaluation of the corrosion specimens will be handled by a certified third-party contractor and will follow NACE RP0775-2005 or equivalent. The contractor is responsible for the calibration and maintenance of the measurement equipment as well as the disposal of the samples when the analysis is finished.

2.7.3 Analytical Method

Table D-6 shows the analytical methods to be used for sampling.

Table D-6. Analytical Method to Be Used for Sampling

Parameters	Analytical Method	Resolution Instruments	Precisions/Std Dev
Mass	NACE SP0775-2018-SC	0.05 mg	2%
Thickness	NACE SP0775-2018-SC	0.01 mm	± 0.05 mm

NACE SP0775-2018-SC: Preparation, Installation, Analysis, and Interpretation of Corrosion Coupons in Oilfield Operations.

2.7.4 Quality Control

The operators reserve the right to audit the QA/QC procedures prior to awarding the work to a contractor and during the execution of the service to ensure the quality and safety program are being followed.

2.7.5 Typical Corrosion Coupon Report

Figure D-2 provides an example typical corrosion coupon report.

RP0775-2005

Appendix A—Typical Corrosion Coupon Report

Lease or facility _____ Well number _____

Well or facility type _____

Flowrates—Oil, m³/d (BOPD) _____ Water, m³/d (BWPD) _____

Gas, m³/d (MMCFPD) _____

Temperature _____ °C (°F) Pressure _____ MPa (psig)

Fluid analysis (attach if lengthy) _____

Gas analysis (attach if lengthy) _____

Coupon location in system _____

Sketch of system with coupon position shown: _____

Coupon number _____ Material _____

Surface finish _____ Exposed area _____

Dimensions _____

Installation date _____ Installation mass _____

Removal date _____ Removal mass _____

Days in system _____ Mass after cleaning _____

Mass loss _____

Average corrosion rate: _____ mm/y (mpy)

Deepest measured pit _____ mm (mil) Maximum pitting rate _____ mm/y (mpy)

Description of deposit before cleaning _____

Analysis of deposit _____

Description of coupon after cleaning (e.g., etch, pitting, erosion, etc.) _____

Chemical treatment during exposure _____

Other remarks _____

Figure D-2. Example typical corrosion coupon report.

2.8 Soil Gas Sampling

The method for soil gas sampling is described in Appendix C of the permit. The samples will be sent to a specialized laboratory to determine gas composition and perform isotopic analysis to characterize the fluid and get a fingerprint for appropriation. In between sampling events, a handheld device should be enough for routine monitoring purposes, which could be done monthly.

2.8.1 Analytical Method

Compositional analysis of the gases includes chromatographic determination of the concentrations of fixed gases and hydrocarbons listed in Table D-7.

Table D-7. Fixed Gas and Hydrocarbons for Compositional Analysis

Fixed Gases		Method
Nitrogen	N ₂	GC
Oxygen	O ₂	GC
Argon	Ar	GC
Carbon Dioxide	CO ₂	GC
Carbon Monoxide	CO	GC
Hydrogen	H ₂	GC
Helium	He	GC
Hydrocarbons		Method
Methane	CH ₄	GC
Ethane	C ₂ H ₆	GC
Ethylene	C ₂ H ₄	GC
Propane	C ₃ H ₈	GC
Propylene	C ₃ H ₆	GC
Isobutane	iC ₄ H ₁₀	GC
Normal Butane	nC ₄ H ₁₀	GC
Isopentane	iC ₅ H ₁₂	GC
Normal Pentane	nC ₅ H ₁₂	GC
Hexanes Plus	C ₆ +	GC

In addition to compositional gas analysis, the samples will be analyzed during the baseline period to identify the isotopes in Table D-8.

Table D-8. Isotopes to Be Identified During Baseline Sampling

Hydrocarbons	Method
$\delta^{13}\text{C}$ and ^{14}C of CO ₂ and CH ₄	GC-IRMS, AMS for ^{14}C
δD of CH ₄ .	GC-IRMS

Isotopes are different forms of the same element, differing only in the number of neutrons in the nucleus of the atom. Although some isotopes are unstable and decay radioactively, most are

stable. Isotopes are valuable tools to distinguish the source of the element and create a fingerprint of the gas.

2.8.2 Equipment and Calibration

Calibration will be performed in accordance with manufacturer protocol. Sampling will be performed by trained or specialize personnel from the lab at the beginning of the operation, and the field operator will be trained in the process to be able to take samples and monitor gas composition with handheld devices as routine operation.

2.9 Water Sampling

2.9.1 Sampling and Custody

2.9.1.1 Sampling Flowing Surface Waters (rivers, streams, drainage ditches)

- Surface water samples at both flowing water and still water sites will be collected using the nonisokenetic (bottles or bailers) sampling method. Field measurement instruments will be calibrated in accordance with manufacturer instructions.
- Before samples are collected, the sample-wetted portions of most of the collection and processing equipment require a field rinse with native water. Field rinsing helps to condition sampling equipment to the sample environment. Rinsing also serves to ensure that all cleaning solution residues have been removed. An area of low-flow turbidity should be located at the sampling site to partially fill and rinse the bottle sampler, trying to avoid getting sand or sediment in the sampler.
- Location and site conditions will be recorded on the field data sheets (i.e., GPS [global positioning system] coordinates, air temperature, wind speed, precipitation, and barometric pressure). An area will be identified in the flowing water body where the water is well mixed laterally and vertically. In general, downstream samples should be collected first followed by upstream samples to minimize disturbance of bottom sediments. Extreme caution should be taken wading in fast-flowing water, and every attempt should be made to utilize a sampling device that does not require wading. In general, personnel shall not wade into flowing water when the product of depth (in feet) and velocity (in feet per second) equals 10 or greater. If flow data are not available, personnel shall not exceed a water depth of knee height. For sample locations that are considerable distance from the shoreline, a boat, dock, or bridge may be employed for sampling.
- Using a bottle, the sample should be collected by standing downstream of the bottle. Care must be taken to avoid collecting particulates that might be resuspended as the result of wading.
- Following the manufacturer instructions for the YSI multiparameter meter and the HANNA chemistry kits, the following measurements should be taken on the first sample collected: temperature, pH, conductivity, dissolved oxygen (DO), total dissolved solids (TDS), oxidation reduction potential (ORP), CO₂, alkalinity calcium carbonate (CaCO₃), and chloride (Cl). Measurements should be recorded on the field data sheet.

- Sample containers should be filled and samples filtered and/or preserved according to instructions in Section 7.0. Date and time of sampling should be recorded on the field data sheet.
- Samples should be labeled with the name of the person sampling, sample description, date, and time. The chain-of-custody form should also be completed.
- Any unusual conditions or deviations from the sampling procedure should be documented on the field data sheet.

2.9.1.2 *Sampling Still Waters (lakes, reservoirs, ponds, marshes)*

- Since still waters have a greater tendency to stratify than rivers or streams, it is important to collect a vertical sample near the bottom of the body of water without disturbing the sediment.
- If the body of water is so large that the sampling locations cannot be reached from the bank, it may be necessary to use a small boat to reach the sampling area.
- If using a bailer or bottle, the sampler should be slowly lowered to the desired depth while minimizing disturbance of the water column, the sample collected, and the sampler slowly raised to the surface. Sampling should be repeated until enough water is collected for the sample bottles.
- If using a peristaltic pump, the pump sample tubing (attached to a weighted line) should be lowered to the desired sampling depth. The pump should be turned on, and about three sample tubing volumes should be pumped to rinse and condition the pump, tubing, and other sample collection or processing equipment. The rinse should be discarded.
- Following the manufacturer instructions for the multiparameter meter and the chemistry kits, the following measurements should be taken on the first sample collected: temperature, pH, conductivity, DO, TDS, ORP, CO₂, alkalinity (CaCO₃), and Cl. Measurements should be recorded on the field data sheet.
- Flow should be direct sampled into collection container(s) until sufficient sample volume has been collected to fill sample bottles.
- Sample containers should be filled and samples filtered and/or preserved. Date and time of sampling should be recorded on the field data sheets.
- Samples should be labeled with the name of person sampling, sample description, date, and time. A chain-of-custody form should be completed.
- Any unusual conditions or deviations from the sampling procedure should be documented on the field data sheet.

2.9.1.3 Ground Water Sampling

Purging the well removes standing and/or stagnant water from the well casing. The purpose of purging is to reduce chemical and biochemical artifacts caused by the materials used for well installation and well construction and by reactions occurring within an open borehole or annular space between a well casing and borehole wall. The rule of thumb is to remove a minimum of three well casing volumes while monitoring field parameters until they stabilize before actual samples can be collected. The well diameter, water level, well bottom depth, and purge volume should be recorded on the field data sheet. At a minimum, three well volumes should be purged while monitoring the temperature, pH, and conductivity until the readings have stabilized. If the readings have stabilized after three well volume purges and meet the criteria in Table D-9, sample collection can proceed. If readings are not stable after three volumes, purge should continue until they are stable, but ten purge volumes should not be exceeded before collecting samples. Those instances when readings are not stable prior to sample collection should be documented. The following stability criteria for the measurements are the allowable variation among five or more field measurements.

Table D-9. Field Measurement Stability Criteria

Field Measurement	Stability Criteria
pH	± 0.1 standards units
Temperature, °C	± 0.5°C
Conductivity, mS/cm	± 5%

2.9.2 Equipment and Calibration

For groundwater sampling, field equipment will be maintained, serviced, and calibrated according to the manufacturers' recommendations. Spare parts that may be needed during sampling will be included in supplies on hand during field sampling. For all laboratory equipment, testing, inspection, maintenance, and calibration will be the responsibility of the analytical laboratory according to method-specific protocols and the laboratory's QA program.

2.9.3 Personnel and Training

Water testing will be performed by personnel of a certified laboratory following the specific methods approved by EPA or other standard. The operator might audit the procedures and results of the selected laboratory with a third party to improve QC.

2.9.4 Analytical Method

Where possible, methods are based on standard protocols from EPA or Standard Methods for the Examination of Water and Wastewater. Laboratories shall have standard operating procedures for the analytical methods performed (Table D-10).

Table D-10. Analytic Method and Parameters that May Be Used During Testing

Parameter	Analytical Method
Major Cations: Al, Ba, Ca, Fe, K, Mg, Mn, Na, Si, Zn, Sr	ICP–AES, EPA Method 200.7 or similar
Trace Metals: Sb, As, Cd, Cr, Cu, Pb, Se, Tl	ICP–MS, EPA Method 200.8 or similar
Cyanide (CN ⁻)	EPA 335.4, colorimetry
Mercury	EPA 245.1, CVAA
Anions: Cl ⁻ , Br ⁻ , F ⁻ , SO ₄ ²⁻ , PO ₄ ³⁻ , NO ₃ ⁻	Ion chromatography, EPA Method 300.1, 4110B or similar
Total and Bicarbonate Alkalinity (as CaCO ₃ ²⁻)	Titration, Standard Methods 2320B
Hardness—Total, as CaCO ₃ , mg/L	Automated colorimetric, EPA 130.1
Gravimetric TDS	Gravimetric method Standard Methods 2540C
Water Density	ASTM International D5057 or equivalent
Total Inorganic Carbon (TIC)	SW846 9060A or equivalent
Dissolved Inorganic Carbon (DIC)	SW846 9060A or equivalent
Total Organic Carbon (TOC)	SW846 9060A or equivalent
Dissolved Organic Carbon (DOC)	SW846 9060A or equivalent
Volatile Organic Analysis (VOA)	SW846 8260B or equivalent
Methane	RSK-175 Mod headspace GC/FID or equivalent
Stable Carbon Isotopes ^{13/12} C (¹³ C) of DIC in Water	Gas bench and CF-IRMS for ^{13/12} C
Radiocarbon ¹⁴ C of DIC in Water	AMS for ¹⁴ C
Hydrogen and Oxygen Isotopes ^{2/1} H (δ) and ^{18/16} O (¹⁸ O) of Water	CRDS H ₂ O
Carbon and Hydrogen Isotopes (¹⁴ C, ^{13/12} C, ^{2/1} H) of Dissolved Methane in Water	Offline prep and dual inlet IRMS for ¹³ C; AMS for ¹⁴ C
Compositional Analysis of Dissolved Gas in Water (including N ₂ , CO ₂ , O ₂ , Ar, H ₂ , He, CH ₄ , C ₂ H ₆ , C ₃ H ₈ , iC ₄ H ₁₀ , nC ₄ H ₁₀ , iC ₅ H ₁₂ , nC ₅ H ₁₂ , and C ₆₊)	GC, modified ASTM 1945D
pH	pH electrode, EPA 150.2, D1293
Temperature	2550B
Conductivity	2510B
Specific Conductance	EPA 120.1

ICP–AES = inductively coupled plasma atomic emission spectrometry; ICP–MS = inductively coupled plasma mass spectrometry; LCS = laboratory control sample; GC/MS = gas chromatography–mass spectrometry; GC/FID = gas chromatography with flame ionization detector; AMS = accelerator mass spectrometry; CRDS = cavity ring down spectrometry; IRMS = isotope ratio mass spectrometry; CVAA: cold-vapor atomic absorption; CF–IRMS: continuous flow isotope ratio mass spectrometry.

2.9.5 Quality Control

QC of the sampling and results will follow the protocols established in the analytical method for testing. The Tundra SGS operator reserves the right to audit the lab procedures and protocols to validate the methods are being followed and the results are accurate.

2.10 CO₂ Flowline Monitoring with Fiber Optics

2.10.1 *Equipment and Calibration*

Fiber optic cables are installed on the flowline for continuous conditioning monitoring. This method is accurate, continuous, and can detect leaks, movement of the flowline due to seismic activities, ground erosion, etc. The main characteristics are as follows:

- Distributed acoustic sensing (DAS): Various DAS technologies are used in the market; the most common is based on coherent optical time domain reflectometry (C-OTDR). C-OTDR utilizes Rayleigh back-scattering, allowing acoustic frequency signals to be detected over long distances. The interrogator sends a coherent laser pulse along an optical fiber (sensor cable). Scattering sites within the fiber causes the fiber to act as a distributed interferometer with a gauge length like the pulse length. Acoustic disturbance on a fiber generates microscopic elongation or compression of the fiber (microstrain), which causes a change in the phase relation and/or amplitude. Before the next laser pulse can be transmitted, the previous pulse must have had time to travel the full length of the fiber and for its reflections to return. Hence, the maximum pulse rate is determined by the length of the fiber. Therefore, acoustic signals can be measured that vary at frequencies up to the Nyquist frequency, which is typically half of the pulse rate. As higher frequencies are attenuated very quickly, most of the relevant ones to detect and classify events are in the lower of the 2-kHz range.
- Distributed temperature sensing (DTS): DTS uses fiber optic sensor cables, typically over lengths of several kilometers, that function as linear temperature sensors. The result is a continuous temperature profile along the entire length of the sensor cable. DTS utilizes the Raman effect to measure temperature. An optical laser pulse sent through the fiber results in some scattered light reflecting to the transmitting end, where the information is analyzed. The intensity of the Raman scattering is a measure of the temperature along the fiber. The anti-Stokes Raman signal changes its amplitude significantly with changing temperature; the Stokes Raman signal is relatively stable. The *position* of the temperature reading is determined by measuring the arrival timing of the returning light pulse similar to a radar echo.
- Distributed strain sensing (DSS): DSS detects change in strain along the flowline due to shifting soil, erosion, frost, and seismic activities.

2.10.2 *Resolution and Accuracy*

Multiple strands of optical fibers in a sheath are installed to take care of the monitoring requirements listed above. A single standard-range temperature sensor can measure up to 9 mi (15 km) of fiber with 3-ft (1-m) resolution, update data in just a few seconds, and resolve temperatures to 0.018°F (0.01°C). The DAS/strain sensor can measure 25 mi in intervals of 6.5 ft to give multiple data alongside the pipe.

Table D-11. Technical Specifications for DTS Sensor

Parameter	
Number of Channels	12 SE or 6 DE
Total Fiber Length (SE)	9 mi
Spatial Resolution	3 or 6 ft
Sample Spacing	15. or 3 ft
Temperature Repeatability	±1.8°F in 12 s
Operating Temperature	32° to 104°F
Non-Operating Temperature	-4° to 149°F
Humidity	5% to 85% relative

Table D-12. Technical Specifications for Intelligence Vibration Sensor/Strain

Parameter	
Number of Channels	1 SE
Total Fiber Length (SE)	25 mi
Lost Budget	18.5 dB
Output	Full aperture seismic waveform or vibration logs
Measurement Parameter	Strain
Operating Wavelength	1550 nm
Range	25 mi
Output Spatial Interval	6.6, 16.4 and 32.8 ft
Output Time Interval	0.1, 0.25, 0.5, 1 and 2 ms
Low-Frequency Limit	5 Hz
Operating Temperature	32° to 113°F
Storing Temperature	-4° to 158°F

2.10.3 Quality Control

The fiber optic cable is governed by American National Standards Institute (ANSI)/Insulated Cable Engineers Association (ICEA) S-87-640 and ANSI/ICEA S104-696 standards. The size and construction details of the cable and installation details will be decided during detailed design of the flowline in consultation with the vendor specialized in the engineering and installation of fiber optic cables.

2.11 Continuous Recording of Injection Pressures, Rate, Temperature, and Volume

Injection pressure and temperature will be continuously measured at the surface via real-time pressure/temperature (P/T) instruments installed in the CO₂ flowline near the interface with the wellhead. The pressure will be measured by electronic pressure transmitter, with analog output mounted on the CO₂ line associated with each injection well (example technical specifications shown in Table D-13). The temperature will be measured by an electronic temperature transmitter mounted in the CO₂ line at a location near the pressure transmitter, and both transmitters will be located near the wellhead (Table D-14).

Table D-13. Technical Specifications for Surface Pressure Gauges

Parameter	
Calibrated Working Pressure Range	0 to 3,000 psi
Pressure Accuracy	±0.0065%
Pressure Resolution	0.001 psi
Type of Sensor	4–20-mA output transmitter; static measurement; 4-wire

Table D-14. Technical Specifications for Surface Temperature Gauges

Parameter	
Calibrated Working Temperature Range	0 to 150°F
Temperature Accuracy	±0.0055%
Temperature Resolution	0.01°F
Type of Sensor	4–20-mA output; RTD

RTD = resistance temperature detector.

Continuously recorded injection parameters will be reviewed and interpreted on a regular basis, to evaluate the injection stream parameters against permit requirements (example technical specifications found in Table D-15). Trend analysis will also help evaluate the performance (e.g., drift) of the instruments, suggesting the need for maintenance or calibration.

Table D-15. Technical Specifications for Multivariable Pressure Transmitter

Parameter	
Mass Flow Rate Accuracy	±0.075%
Differential Pressure	–1000 to 1000 in H ₂ O (–2.5 to 2.5 bar)
Static Pressure Type	Gauge
Static Pressure Range Url	3,626 psi
Temperature Range	–328° to 1562°F
Type of Equipment	Orifice meter with multivariable transmitters and direct process variable outputs for static pressure, differential pressure, and temperature

The flow rate of CO₂ injected into the well field will be measured by flowmeter skids with senior orifice meters (Table D-16). A total of three meters will be supplied. Each well will have a dedicated meter. Piping and valving will be configured to permit the calibration of each flowmeter. The flow transmitters will each be connected to a remote terminal unit (RTU) on the flowmeter skid.

Table D-16. Technical Specifications for Senior Orifice

Senior Orifice	
Sizing	8-in., 16-in. ranges, flow rate by manufacturer
Temperature Range	-50° to 200°F
Tolerance	Based on manufacturer manual

The flowmeters will be connected to the main CO₂ storage site SCADA system for continuous monitoring and control of the CO₂ injection rate into each well. The flow rate into each well will be controlled using a flow control valve located in the CO₂ pipeline associated with each well.

Pressure and temperature gauges will be deployed on tubing above and below the injection packer to monitor in real-time bottomhole conditions. The gauges and cables will be selected to comply with CO₂ service conditions, and the data will be integrated in the SCADA system and the surveillance platform. Table D-17 shows an example of technical specifications for downhole gauges.

Table D-17. Technical Specifications for Downhole Sensors P/T

Parameter	
Pressure of Sensor	Quartz/Inconel [®] Carriers
Pressure Accuracy	± 0.02%
Pressure Repeatability	≤0.01% of full scale
Temperature Sensor	Quartz/Inconel carriers
Temperature Accuracy	±0.5°C
Temperature Resolution	0.005°C
Operating Temperature Ranges	-20° to 200°C
Sample Rate	1 s
Inconel Cable	Required

2.12 Annular Pressure Testing

Annular pressure testing is used to validate mechanical integrity in the system. Tests will be performed at least once every 5 years in injectors and monitoring wells, when tubing and packer are pulled for workover, or when the monitoring systems indicate a potential mechanical integrity issue.

To start the test, the well is shut in to stabilize the pressures (injectors). The testing equipment is connected to the annular valves, and surface lines are tested to 1500 psi above the testing pressure. The operator must ensure there are no surface leaks from the pumping unit to the wellhead valve. Any air in the system is bled. If needed, the annular is completed with packer fluid and corrosion inhibitor (it should require minimum amount if so). Initial tubing and casing pressure are recorded. The well will be tested to 1000 psi in the annular, and the pressure should not

decrease more than 10% in 30 minutes. Tubing and casing pressure is monitored continuously. Final tubing and casing pressure are recorded and pressure and volume bled.

If the pressure decreases more than 10%, the pressure is bled, the surface connection tested, and the test repeated. If there is an indication of mechanical failure, the operator will prepare a plan to repair the well and discuss it with the director.

Surface gauges should be calibrated according to manufacturer recommendations and should have a pressure range which will allow the test pressure to be near the midrange of the gauge. Additionally, the gauge must be of sufficient accuracy and scale to allow an accurate reading of a 10% change. The test results will be documented and store in the centralized database of the project for reporting and documentation.

2.13 Fall-Off Test in Injector Wells

Pressure fall-off testing will be conducted upon completion of the injection wells to characterize reservoir hydrogeologic properties and aquifer response model characteristics as well as changes in near-well/reservoir conditions that may affect operational CO₂ injection behavior.

Pressure fall-off testing will also be conducted at least once 5 years after injection for AOR review. Specifically, the objective of the periodic pressure fall-off testing is to determine whether any significant changes in the near-wellbore conditions have occurred that may adversely affect well/reservoir performance.

2.13.1 Testing Method

Controlled pressure fall-off tests are conducted by terminating injection for a designed period/duration of time. The pressure fall-off test is then started with shutting in the well by closing the surface wellhead valve(s) and maintaining continuous monitoring of the surface and downhole pressure recovery within the well/test interval system during the fall-off/recovery period. The designed duration of the pressure fall-off recovery test is a function of a number of factors, including the exhibited preoperational injection reservoir test response characteristics, injection well history prior to termination (i.e., injection duration, rate history), and potential pressure interference effects imposed by any surrounding injection wells completed within the same reservoir. Because of the potential impact of injection rate variability on early-time pressure fall-off recovery behavior, its recommended that injection rates and pressures be uniform and held constant prior to initiating a pressure fall-off test.

Upon shutting-in the well, pressure measurements are monitored continuously in real time, both downhole (within or in the proximity to the injection reservoir) and at the surface wellhead location. Temperature measurements taken during the test may assist in data interpretation. Bottomhole reservoir pressure measurements may be less subject to data scatter, and because of the compressible nature of supercritical and liquid CO₂, bottomhole gauges should be the least affected by wellbore effects. Wellhead (surface) pressure measurements may be sufficient if a positive pressure is maintained at the surface throughout the test.

The duration of the shut-in period used in conducting the pressure fall-off test should be extended sufficiently beyond wellbore storage effects and when the pressure recovery is indicative

of infinite-acting radial flow (IARF) conditions. The establishment of IARF conditions is best determined by using pressure derivative diagnostic analysis plots (Boudet and others, 1989; Spane, 1993; Spane and Wurstner, 1993) and is indicated when the log-log pressure derivative/recovery time plot forms a horizontal line. When IARF pressure fall-off conditions are indicated, the pressure response versus log of fall-off/recovery time becomes a straight line on a standard semi-log plot.

EPA (2012) recommends a general rule-of-thumb of extending pressure fall-off tests a factor of three to five beyond the time required to reach radial flow conditions, while Earlougher (1977) suggests extending recovery periods between 1 and 1.5 log cycles beyond when the pressure response starts to deviate from purely wellbore storage response characteristics (i.e., a unit slope, 1:1 on a standard log-log pressure fall-off recovery plot).

For projects like the Tundra SGS Broom Creek Formation that will use more than one injection well completed in the same reservoir, special considerations need to be taken to execute the pressure fall-off testing to minimize the pressure response impacts from neighboring injection wells in the well recovery response. For the neighboring injection wells (i.e., those not being tested), EPA (2012) recommends that injection at these wells either be terminated prior to initiating the pressure fall-off test for a duration exceeding the planned shut-in period or injection rates at the neighboring wells be held constant and continuously recorded prior to and during the fall-off recovery test. Following the fall-off test, owners or operators are encouraged to send at least two pulses to the test well by way of rate changes in the offset well. These pulses will demonstrate communication between the wells, and if maintained for sufficient duration, they can be analyzed as an interference test to obtain interwell reservoir parameters.

No specialized sample/data-handling procedures are required. Electronic sensor data (e.g., pressure data) will be recorded on data loggers. All electronic data and field records will be transferred and stored on secure servers at the conclusion of each test.

2.13.2 Analytical Methods

Quantitative analysis of the pressure fall-off test response recorded following termination of injection for the test well provides the basis for assessing near well and larger-scale reservoir behavior. Comparison of diagnostic pressure fall-off plots established prior to the operational injection of CO₂ and periodic fall-off tests conducted during the operational injection phases can be used to determine whether significant changes in well or injection reservoir conditions have occurred. Diagnostic derivative plot analysis (Boudet and others, 1989; Spane, 1993; Spane and Wurstner, 1993) of the pressure fall-off recovery response is particularly useful for assessing potential changes in well and reservoir behavior.

The plotting of downhole temperature concurrent with the observed fall-off test pressure is also useful diagnostically for assessing any observed anomalous pressure fall-off recovery response. Commercially available pressure gauges typically are self-compensating for environmental temperature effects within the probe sensor (i.e., within the pressure sensor housing). However, if temperature anomalies are not accounted for correctly (e.g., well/reservoir temperatures responding differently than registered within the probe sensor), erroneous fall-off pressure response results may be derived. As previously discussed, concurrent plotting of

downhole temperature and pressure fall-off responses is commonly useful for assessing when temperature anomalies may be affecting pressure fall-off/recovery behavior. In addition, diagnostic pressure fall-off plots should be evaluated relative to the sensitivity of the pressure gauges used to confirm adequate gauge resolution (i.e., excessive instrument noise).

Standard diagnostic log–log and semi-log plots of observed pressure change and/or pressure derivative plots versus recovery time are commonly used as the primary means for analyzing pressure fall-off tests. In addition to determining specific well performance conditions (e.g., well skin) and aquifer hydraulic property and boundary conditions, the presence of prevailing flow regimes can be identified (e.g., wellbore storage, linear, radial, spherical, double-porosity, etc.) based on characteristic diagnostic fall-off pressure derivative patterns. A more extensive list of diagnostic derivative plots for various formation and boundary conditions is presented by Horne (1990) and Renard and others (2009).

Early pressure fall-off recovery response corresponds to flow conditions within and in the proximity of the wellbore, while later fall-off recovery response is reflective of progressively more distant reservoir conditions from the injection well location. Significant divergence in pressure fall-off response patterns from previous pressure fall-off tests (e.g., accelerated pressure fall-off recovery rates) may be indicative of a change in well and/or reservoir conditions (e.g., reservoir leakage). A more detailed discussion of using diagnostic plot analysis of pressure fall-off tests for discerning possible changes to well and reservoir conditions is presented by EPA (2002).

Quantitative analysis of the pressure fall-off test data can be used to determine formation hydraulic property characteristics (e.g., permeability, transmissivity) and well skin factor (additional pressure change effects due to altering the permeability/storativity conditions of the reservoir/well injection interval boundary). Determination of well skin is a standard result for pressure fall-off test analysis and described in the standard well test analysis texts such as that by Earlougher (1977). Software programs are also commercially available for analyzing pressure fall-off tests. Significant changes in well and reservoir property characteristics (as determined from pressure fall-off analysis), compared to those used in site computational modeling and AOR delineation, may signify a reevaluation of the AOR.

2.13.3 Instrument/Equipment Calibration and Frequency

All field equipment will be visually inspected and tested prior to use. Spare instruments, batteries, etc., will be stored in the field support trailer.

Pressure gauges that are used to conduct fall-off tests will be calibrated in accordance with manufacturer recommendations. In lieu of removing the injection tubing to regularly recalibrate the downhole pressure gauges, their accuracy might be demonstrated by comparison to a second pressure gauge, with current certified calibration, that will be lowered into the well to the same depth as the permanent downhole gauge. Calibration curves, based on annual calibration checks (using the second calibrated pressure gauge) developed for the downhole gauge, can be used for the purpose of the fall-off test. If used, these calibration curves (showing all historic pressure deviations) will accompany the fall-off test data.

2.14 CO₂ Leak Detector

An infrared gas detector will be installed closed to the wellheads of the injector wells and the monitoring well. This sensor will be the interface with the surveillance system to set alarms and provide information on potential leaks at the surface. An example of sensor technical specifications is described in the following data sheet as a reference only (Figure D-3). Final selection of the technology will consider the integration of all the sensors and transducers in a unique surveillance system. Calibration and maintenance protocols will be based on manufacturer specifications and will be performed by specialized professionals. Table D-18 shows referential technical specifications for the CO₂ leak detector.

2.15 DTS Fiber Optic Array Downhole

DTS for downhole application follows the same physical principle discussed for flowline monitoring in the previous sections. The fiber optic is run alongside the casing as an umbilical, and it is protected with clamps and a centralizer to avoid any damage while deploying in the well. The fiber is connected on surface to an interrogator to convert the signal to temperature values, and data are transmitted to the monitoring platform in real time to perform surveillance.

The maintenance and calibration of the equipment will be performed in accordance with manufacturer manuals and will be the responsibility of the provider of the technology. Tables D-19 and D-20 show referential technical specification for DTS systems and fiber optic cable.

2.16 Time-Lapsed 3D Seismic Survey

3D surface seismic is a proven deep reflection technique utilizing seismic sources and receivers to produce full volumetric images of subsurface structure including reservoir and overburden. Under favorable circumstances, 3D surface seismic can offer spatial resolution down to a few meters or less. It offers an effective means of imaging compressible fluids (i.e., CO₂) in the subsurface. A key application of surface seismic methods for monitoring purposes is the time-lapse 3D (4D) seismic method, in which a number of repeat surveys are acquired, enabling changes in fluid distribution to be mapped through time. This has been used successfully in the oil industry to image fluid changes in hydrocarbon reservoirs for a number of years. The technique produces reflections that correspond to P-wave acoustic impedance boundaries in the subsurface. These are commonly associated with boundaries between different rock units, so reflectivity is an effective proxy for subsurface structure. Because of its physical properties, CO₂ in the free (gaseous or fluid) state is highly compressible, which enhances reflectivity over a range of underground storage situations and is particularly well-suited to seismic imaging methods.

2.16.1 Equipment and Calibration

Seismic acquisition and processing are performed by highly specialized companies and crews that provide the equipment, procedures, and QC protocols based on the technology selected for acquisition and parameters for processing the data. As such, these parameters are verified by the client with a parameter sheet, as shown in Figure D-4.

S5000 Gas Monitor

Specifications



Product Specifications		Environmental Specifications	
COMBUSTIBLE GAS SENSOR TYPE	Catalytic bead (Passive comb., XCell comb.) Infrared (IR400)	OPERATING TEMPERATURE RANGE	Transmitter CB (sintered, Zones) -55°C to +75°C CB (screened, Div) -40°C to +70°C MOS (sintered, Zones) -40°C to +70°C MOS (screened, Div) -40°C to +75°C IR (CSA) -40°C to +75°C IR (ATEX/IECEX) -60°C to +75°C XCell (Comb) -55°C to +60°C XCell (Toxic/O ₂) -40°C to +60°C
TOXIC GAS & OXYGEN SENSOR TYPE	XCell Toxic Ammonia (NH ₃), Carbon Monoxide (CO), Carbon Monoxide (CO) H ₂ -resistant, Chlorine (Cl ₂), Sulfur Dioxide (SO ₂) Passive MOS, Echem, XCell Toxic Hydrogen Sulfide (H ₂ S) XCell O₂ Oxygen (O ₂) Infrared Carbon Dioxide (CO ₂) Electrochem Ammonia (NH ₃), Hydrogen (H ₂), Hydrogen Chloride (HCl), Hydrogen Cyanide (HCN), Nitric Oxide (NO), Nitrogen Dioxide (NO ₂)	STORAGE TEMPERATURE RANGE	Housing, IR400, IR700, passive sensors -50°C to +85°C XCell sensors -40°C to +60°C
SENSOR MEASURING RANGES	Combustible 0-100% LEL (CB, IR) O₂ 0-5, 0-10, 0-20 ppm CO 0-100, 0-500, 0-1000 ppm CO, H₂-resistant 0-100 ppm CO₂ 0-2000, 0-5000, 0-10000, 0-30000, 0-50000 ppm H₂ 0-1000 ppm HCl 0-50 ppm HCN 0-50 ppm H₂S 0-10, 0-20, 0-50, 0-100, 0-500 ppm NH₃ 0-100 ppm, 0-1000 ppm NO 0-100 ppm NO₂ 0-10 ppm O₂ 0-25% SO₂ 0-25, 0-100 ppm	RELATIVE HUMIDITY (NON-CONDENSING)	XCell sensors, IR400, IR700 10-95% Passive combustible 0-95% Passive H ₂ S 15-95%
APPROVALS CLASSIFICATION DIVISIONS (US/CAN)	See manual for complete CSA listings.	Mechanical Specifications	
US ZONES	Class I, Div/Zone 1&2, Groups A, B, C & DTs/T4; Class II, Div/Zone 1&2, Groups E, F & G, T6; Class III Type 4X, IP66	INPUT POWER	24VDC nominal, 12 to 30VDC
CANADIAN ZONES/ ATEX/ IECEx	Class I, Zone 1 AEx db IIC T5 Gb Class I, Zone 2 AEx nA nC IIC T4 Gc Zone 21 AEx tb IIIC T85°C Db Ex db IIC T5 Gb Ex nA nC IIC T4 Gc Ex tb IIIC T85°C Db	SIGNAL OUTPUT	Dual 4-20 mA current source or sink, HART, Modbus, Bluetooth. <i>Optional: w/o Bluetooth</i>
CE MARKING DIRECTIVES	Complies with EMC, RED, ATEX	RELAY RATINGS	5A @ 30VDC; 5A @220VAC (3X) SPDT – fault, warn, alarm
WARRANTY	S5000 transmitter 2 years XCell Sensors 3 years Passive comb., MOS, IR400, IR700 2 years Echem Sensors Varies by gas	RELAY MODES	Common, discrete, horn
APPROVALS	CSA, FM [®] , ATEX, IECEx, INMETRO, ABS, DNV-GL Marine, CE Marking. Complies with C22.2 No. 152, FM 6320, ANS/ISA/CSA/IEC/EN 60079-29-1, ANS/ ISA 12.13.01. Suitable for SIL 2.	NORMAL MAX POWER	Without Relays With Relays Passive comb. 5.0 W 6.0 W Passive MOS 9.8 W 10.8 W IR400/IR700 7.9 W 8.9 W XCell comb. 5.0 W 6.0 W XCell toxic & O ₂ 2.6 W 3.6 W IR400/IR700 + XCell comb. 10.8 W 11.8 W IR400/IR700 + XCell toxic or O ₂ 8.6 W 9.6 W Dual XCell toxic or O ₂ 3.3 W 4.3 W Dual XCell comb. 7.4 W 8.4 W XCell comb. + XCell toxic or O ₂ 5.7 W 6.7 W
Dimensions	HOUSING (W x H x D) 6.37" x 5.38" x 4.25" (162 x 137 x 108 mm) W/PASSIVE SENSOR 6.37" x 7.62" x 4.25" (162 x 193 x 108 mm) W/DIGITAL SENSOR 6.37" x 10.4" x 4.25" (162 x 265 x 108 mm) W/IR400 IR SENSOR 14.8" x 6.0" x 4.25" (375 x 152 x 108 mm)	STATUS INDICATORS	4-digit scrolling LED, icons depicting fault, warn, alarm, Bluetooth, 1 and 2 to indicate sensor reading displayed
WEIGHT	8 lb. (3.6 kg), 316 SS	RS-485 OUTPUT	Modbus RTU, suitable for linking up to 128 units or up to 247 units with repeaters
		BAUD RATE	2400, 4800, 9600, 19200, 38400, 115200
		HART	HART 7, Device Description (DD) and Device Type Manager (DTM) available
		FAULTS MONITORED	Low supply voltage, RAM checksum error, flash checksum error, EEPROM error, internal circuit error, relay, invalid sensor configuration, sensor faults, calibration faults, analog output mismatch fault
		CABLE REQUIREMENTS	3-wire shielded cable for single sensor and 4-wire shielded cable for dual sensor configurations. Accommodates up to 12 AWG or 4 mm ² <i>Refer to manual for mounting distances.</i>

** See manual for FM-approved sensors

Specifications subject to change without notice.

MSA operates in over 40 countries worldwide. To find an MSA office near you, please visit MSAsafety.com/offices.

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MSAsafety.com/detection

Figure D-3. Example data sheet of sensor technical specifications.

Table D-18. Technical Specifications for CO₂ Leak Detector

Type of Sensor	Infrared
Measurement Ranges	
Combustible	0–100% lower explosive limit (LEL)
CO ₂	0–2,000, 0–5,000, 0–10,000, 0–30,000 ppm
Resolution	1% LEL
Response Time	T50 <4 s, T90 < 9 s
Approval Classification	Class I, Div/Zone 1&2, Groups A,B,C,D T5/T4
Operating Ranges	–40° to 50°C
Relative Humidity	10%–95%

Table D-19. Technical Specification for DTS

	Parameter
Spatial Resolution	1 m (3.2 ft) across entire measurement range
Sampling Resolution	Down to 0.5 m (1.6 ft) across entire measurement range
Temperature Resolution	0.1°C (0.18°F)
Accuracy	±0.5°C (± 0.9°F)
Measurement Range	Up to 12 km
Measurement Temperature Range	–250° to 400°C
Measurement Times	10 s to 24 h
Dynamic Range	30 dB
Operating Environment	–10° to 60°C, humidity 0–95% noncondensing

Table D-20. Technical Specifications for Fiber Optic Cable

	Parameter
Tensile Strength	2,372 lb
Yield Strength	2,018 lb
Strain @ Yield	0.31%
Hydrostatic Pressure	23,872 psi
Burts Pressure	28,050 psi
Working Pressure	20,526 psi
Static Bend Radius	3.2 in.



ZLand Gen2 Transcriber Parameter Sheet

Project Name:	Carbonsafe Phase III 2D/3D	Test Line: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Project Co-ordinate system:	NAD 1927 StatePlane North Dakota South FIPS 3302	
Transcriber Script Projection:		
Acquisition Schedule:	<input checked="" type="checkbox"/> Continuous	<input type="checkbox"/> Scheduled: Start: Finish:
Acquisition Parameters:	Sample Rate	<input type="checkbox"/> 0.5ms <input type="checkbox"/> 1ms <input checked="" type="checkbox"/> 2ms <input type="checkbox"/> 4ms
	Pre-Amp Gain	<input type="checkbox"/> 0dB <input type="checkbox"/> 6dB <input type="checkbox"/> 12dB <input type="checkbox"/> 18dB <input type="checkbox"/> 24dB <input type="checkbox"/> 30dB <input checked="" type="checkbox"/> 36dB
	Anti-Alias Filter	<input checked="" type="checkbox"/> Linear <input type="checkbox"/> Minimum
<i>*Note no low cut filter is not recommended by Fairfield Nodal.</i>	Low Cut Filter	<input checked="" type="checkbox"/> 1-60Hz (1Hz) <input type="checkbox"/> None (Not recommended)
Pre-Start Instrument Tests:	<input type="checkbox"/> All gains and sample rates <input checked="" type="checkbox"/> Production Parameters Only	
Source Type:	<input checked="" type="checkbox"/> Vibroseis <input type="checkbox"/> Dynamite <input type="checkbox"/> OnSeis © <input type="checkbox"/> Other:Passive	
	Vibroseis Sweep Length:	3 x 20 seconds
Record Length:	5 seconds total	
Wireline Regularity: N/A	<input type="checkbox"/> Weekly <input type="checkbox"/> Monthly <input type="checkbox"/> Other (Post Startup wirelines can be requested after project completion)	
Aux Channels Required:	<input checked="" type="checkbox"/> Timebreak <input type="checkbox"/> Pilot <input type="checkbox"/> Spare Pilot	
<i>*Note: 2 Pilots is SAE Standard for Vib</i>	<input checked="" type="checkbox"/> Others: TBD, reference marks, uphole	
Sensor to be used:	<input checked="" type="checkbox"/> Internal 10hz DTCC SOLO <input type="checkbox"/> External: SM24 6x1	
Deliverable Data:	<input checked="" type="checkbox"/> Shot Gather RAW <input checked="" type="checkbox"/> Shot Gather Correlated <input type="checkbox"/> Stacked	
<i>*Note: Correlation will be done with 3rd party software.</i>	<input type="checkbox"/> Receiver Gather (Combed)	
	<input checked="" type="checkbox"/> Continuous Receiver Gather (Record length: <input checked="" type="checkbox"/> 30 Sec <input type="checkbox"/> 60Sec)	
Supporting Documents:	<input checked="" type="checkbox"/> Data Output Logs <input checked="" type="checkbox"/> Deployment File <input checked="" type="checkbox"/> Receiver File	<input type="checkbox"/> Other:
Data Delivery Address:	One copy: Earth Signal Processing Ltd., Attn: Brendan Smith, 1600, 715 – 5th Avenue SW Calgary, Alberta, Canada T2P 2X6 One copy: Minnkota Power Cooperative, Attn: Dan Laudal, 5301 32 nd Ave. S., Grand Forks, ND 58201	

Figure D-4. Example parameter sheet.

2.17 Geophone Array for Seismicity

Based on the information provided by the U.S. Geological Survey (USGS), the North Dakota area does not show high seismic activity that could endanger the containment of the CO₂ in the storage complex or nearby infrastructure. Seismicity history was discussed in Section 2.0 of the permit.

Change of in situ stresses on existing faults caused by human activities (e.g., mining, dam impoundment, geothermal reservoir stimulation, wastewater injection, hydraulic fracturing, and CO₂ sequestration) may induce earthquakes on critically stressed fault segments. To monitor potential induced seismicity due to the injection of CO₂ in the area. The project will plan to continuously monitor seismicity magnitudes and hypocenter locations through sufficiently supplementing existing available stations. The existing 3D seismic and velocity data in the AOR provide additional confidence for locating the hypocenter of measurable seismicity. Other sources of impulsive seismic noise (i.e., large commercial vehicles, mine blasts, etc.), recorded with the proposed seismometer array, can be easily discriminated from potential seismicity related to injection operations.

2.17.1 Personnel and Equipment

The design and installation of the seismometer station array is performed by specialized contractors including the following activities:

- Project management support to design seismometer array, model network performance, coordinate permitting and equipment installation, testing and maintenance, and ensuring optimum execution of project.
- Field operation to deploy surface seismic station instrumentation, power and communication systems, data quality, and commissioning.
- Data acquisition, system configuration, and processing setup.
- Continuous support and monitoring for data verification and QA/QC.
- Continuous near-real-time reporting, including analyst review and alert notifications for events at or above predetermined magnitude thresholds over the seismic area.

The equipment proposed for seismic station includes the following:

- Broadband sensors
- Data logger
- Solar power system and back-up battery
- Communication system
- Cabling
- Mounting equipment

Figure D-5 shows technical specifications for the broadband seismometer as a reference. Figure D-6 shows an example of setup for data acquisition, transfer, storage, and analysis.

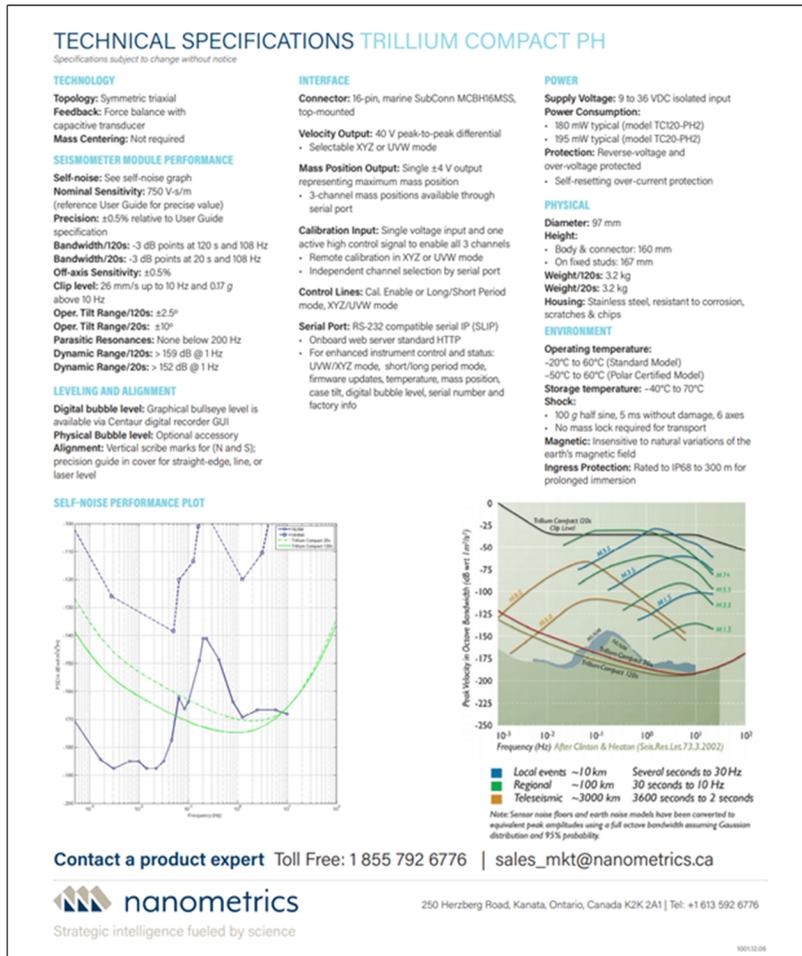


Figure D-5. Reference technical specifications for broadband seismometer.

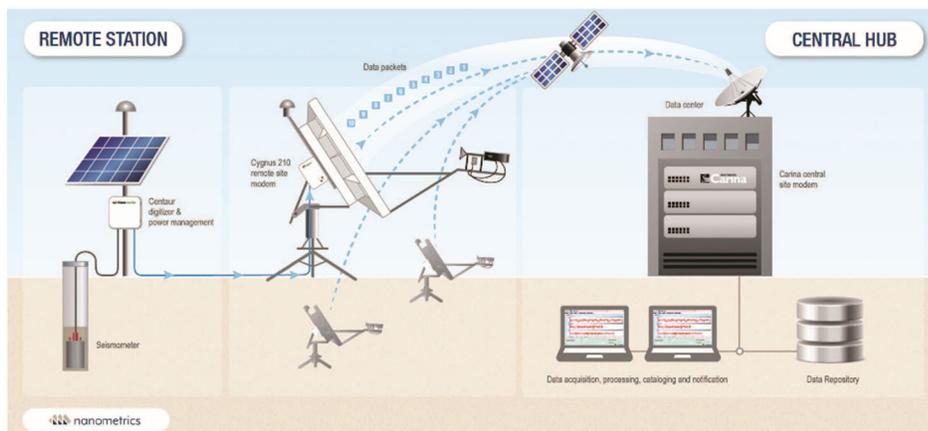


Figure D-6. Example setup for data acquisition, transfer, storage, and analysis.

2.17.2 *Traffic Light System*

While the historical seismicity of the project area indicates few earthquakes in the area, the operator intends to maintain a surface array for the duration of the project to ensure the safe operation of both the storage facility and adjacent infrastructure in the area. This seismic monitoring will be conducted with a surface array deployed to ensure detection of events above ML 2.0, with epicentral locations within 5 km of the injection well.

If an event is recorded by either the local private array or the public national array to have occurred within 5 km of the injection well, the operator would implement its response plan subject to detected earthquake magnitude limits defined below so as to eliminate or reduce the magnitude and/or frequency of seismic events.

- For events above ML 2.0 within 5 km of the injection well, the operator will closely monitor seismic activity and may implement a pause to operations or continue operations at a reduced rate, should analysis indicate a causal relationship between injection operations and detected seismicity.
- For events above ML 4.0 within 5 km of the injection well, the operator will stop injection and perform an inspection in surface facilities and wells. If there is no damage, the operator will reduce the injection rate by not less than 50% and perform a detailed analysis to determine if a causal relationship exists. Should a causal relationship be determined, a revised injection plan would be developed to reduce or eliminate operationally related seismicity. Such plans are dependent on the pressures and seismicity observed and may include, but not be limited to:
 - Pausing operations until reservoir pressures fall below a critical limit.
 - Continuing operations at a reduced rate and/or below a revised maximum operation pressure.

If the event is not related to the storage facility operation, the operator will resume normal injection rates.

- For events above ML 4.5 within 5 km of the injection well, the operator will stop injection. The operator will inform the regulator of seismic activity and inform them that operations have stopped pending a technical analysis. The operator will initiate an inspection of surface infrastructure for damage from the earthquake. A detailed analysis is conducted to determine if a causal relationship exists between injection operations and observed seismic activity. Should a causal relationship be determined, a revised injection plan would be developed to reduce or eliminate operationally related seismicity before resuming injection operations. Such plans are dependent on the pressures and seismicity observed and may include, but not be limited to:
 - Pausing operations until reservoir pressures fall below a critical limit.
 - Continuing operations at a reduced rate and/or below a revised maximum operation pressure.

If the event is not related to the storage facility operation, and previously approved by the regulators, the operator will resume normal injection rates in steps, increasing the surveillance.

2.18 InSAR Method for Surface Deformation

Geodetic methods, like interferometric synthetic aperture radar (InSAR) (Vasco and others, 2020), can detect small-scale surface deformation and has been shown to approximately map pressure distribution associated with subsurface fluid injection (Reed and others, 2018). InSAR is widely available and allows for multiple nonunique interpretations requiring integration with other monitoring methods (e.g., time-lapse seismic). InSAR requires continuous satellite coverage with consistent surface reflectivity (Klemm and others, 2010). In areas where there is snowfall, agricultural changes, or erosional features, the InSAR results will be uncertain and unreliable for elevation changes. To improve inSAR measurement sensitivity, reflectivity challenges can be mitigated by installing stable reflective monuments.

3. REFERENCES

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APPENDIX D-1

**DATA SHEET FOR FORMATION EVALUATION
TOOLS**

S5000 Gas Monitor

Extreme Durability. Anytime. Anywhere.



General Monitors

Simple retrofits have identical footprint and wiring to S4000 Gas Monitor series.

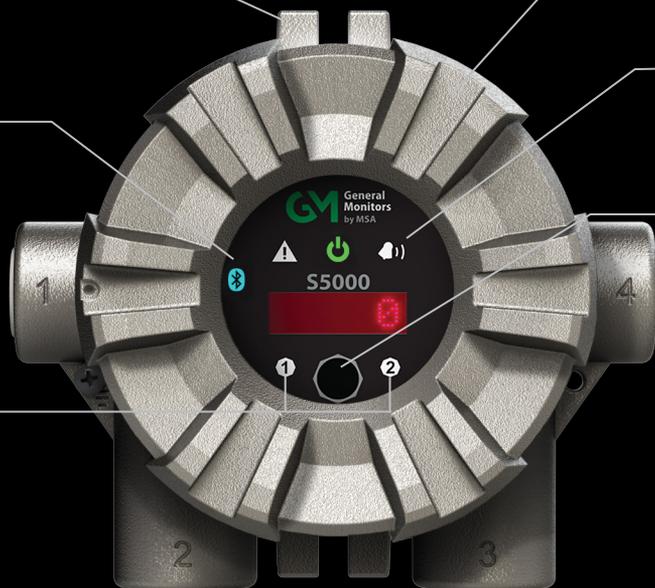
Wide operating temperature for extreme environments (-55°C to +75°C).

Bluetooth® wireless technology allows mobile device to act as HMI screen and controller via the X/S Connect App.

Instrument status indicators illuminate power, fault, and alarm conditions.

Dual sensor capability increases detection coverage without increasing CAPEX expense. Remote mount gas sensors up to 100 m away.

Intuitive user experience with industry-first touch-button interface or familiar magnetic interface.



X/S Connect App

Reduce setup time by at least 50% with the X/S Connect App.



Advanced Sensor Technology

POWERED BY



WITH



- Patented XCell H₂S and CO Sensors with TruCal technology extend calibration cycles for as long as 2 years, actively monitor sensor integrity, and compensate for environmental factors and electrochemical sensor drift.
 - **Diffusion Supervision** sends acoustic signal every 6 hours to check that sensor inlet isn't obstructed so gas can reach the sensor.
 - Worry-free operation; automatically self-checks four times per day.
- Three-year warranty and five-year expected life for XCell Sensors.
- **SafeSwap** enables safe and quick XCell Sensor replacement without powering off gas detector.

Applications

- Compressor stations
- LNG/LPG processing and storage
- CNG maintenance facilities
- Oil well logging
- Drilling and production platforms
- Petrochemical
- Fuel loading facilities
- Refineries



SafeSwap®



The Safety Company

WE KNOW WHAT'S AT STAKE.

S5000 Gas Monitor

Sensor Specifications



Electrochemical Sensors													
Gas	Default Range	Selectable Full Scale Range	Resolution	Response Time*		Repeatability	Zero Drift	Operating Temperature		Sensor Type	Sensor Life	Warranty	Classification
				T50	T90			Min	Max				
Ammonia - 100	0 - 100 ppm	25 - 100 ppm	0.1 ppm	< 20 Sec	< 60 Sec	< +/- 1%	<1% FS / Month	-40 C (-40 F)	60 C (140 F)	XCell	5 Years	3 Years	Div/Zone 2
Ammonia - 1000	0 - 1000 ppm	190 - 1000 ppm	10 ppm	< 20 Sec	< 300 Sec	< +/- 15%	<1% FS / Month	-30 C (-22 F)	50 C (122 F)	Echem	2 Years	1 Year	Div/Zone 2
Carbon Monoxide - 100	0 - 100 ppm	10 - 1000 ppm	1 ppm	< 3 Sec	< 9 Sec	< +/- 1%	<1% FS / Year	-40 C (-40 F)	60 C (140 F)	XCell	5 Years	3 Years	Div/Zone 1
Carbon Monoxide - 500	0 - 500 ppm	10 - 1000 ppm	1 ppm	< 3 Sec	< 9 Sec	< +/- 1%	<1% FS / Year	-40 C (-40 F)	60 C (140 F)	XCell	5 Years	3 Years	Div/Zone 1
Carbon Monoxide - 1000	0 - 1000 ppm	10 - 1000 ppm	1 ppm	< 3 Sec	< 9 Sec	< +/- 1%	<1% FS / Year	-40 C (-40 F)	60 C (140 F)	XCell	5 Years	3 Years	Div/Zone 1
Carbon Monoxide - H2 Resistant	0 - 100 ppm	10 - 1000 ppm	1 ppm	< 3 Sec	< 9 Sec	< +/- 1%	<1% FS / Year	-40 C (-40 F)	60 C (140 F)	XCell	5 Years	3 Years	Div/Zone 1
Chlorine - 5	0 - 5 ppm	1 - 20 ppm	0.1 ppm	< 5 Sec	< 12 Sec	< +/- 1%	<1% FS / Month	-40 C (-40 F)	60 C (140 F)	XCell	5 Years	3 Years	Div/Zone 2
Chlorine - 10	0 - 10 ppm	1 - 20 ppm	0.1 ppm	< 5 Sec	< 12 Sec	< +/- 1%	<1% FS / Month	-40 C (-40 F)	60 C (140 F)	XCell	5 Years	3 Years	Div/Zone 2
Chlorine - 20	0 - 20 ppm	1 - 20 ppm	0.1 ppm	< 5 Sec	< 12 Sec	< +/- 1%	<1% FS / Month	-40 C (-40 F)	60 C (140 F)	XCell	5 Years	3 Years	Div/Zone 2
Hydrogen	0 - 1000 ppm	250 - 1000 ppm	10 ppm	< 40 Sec	< 185 Sec	< +/- 10%	<1% FS / Month	-30 C (-22 F)	50 C (122 F)	Echem	2 Years	1 Year	Div/Zone 1
Hydrogen Chloride	0 - 50 ppm	25 - 50 ppm	1 ppm	< 30 Sec	< 120 Sec	< +/- 35%	<1% FS / Month	-30 C (-22 F)	40 C (104 F)	Echem	2 Years	1 Year	Div/Zone 2
Hydrogen Cyanide	0 - 50 ppm	25 - 50 ppm	1 ppm	< 8 Sec	< 30 Sec	< +/- 15%	<1% FS / Month	-20 C (-4 F)	40 C (40 F)	Echem	2 Years	1 Year	Div/Zone 1
Hydrogen Sulfide - 10	0 - 10 ppm	10 - 100 ppm	0.1 ppm	< 7 Sec	< 23 Sec	< +/- 1%	<1% FS / Year	-40 C (-40 F)	60 C (140 F)	XCell	5 Years	3 Years	Div/Zone 1
Hydrogen Sulfide - 50	0 - 50 ppm	10 - 100 ppm	0.1 ppm	< 7 Sec	< 23 Sec	< +/- 1%	<1% FS / Year	-40 C (-40 F)	60 C (140 F)	XCell	5 Years	3 Years	Div/Zone 1
Hydrogen Sulfide - 100	0 - 100 ppm	10 - 100 ppm	0.1 ppm	< 7 Sec	< 23 Sec	< +/- 1%	<1% FS / Year	-40 C (-40 F)	60 C (140 F)	XCell	5 Years	3 Years	Div/Zone 1
Hydrogen Sulfide - 500	0 - 500 ppm	20 - 500 ppm	1 ppm	< 20 Sec	< 60 Sec	< +/- 10%	<1% FS / Month	-40 C (-40 F)	50 C (122 F)	Echem	2 Years	1 Year	Div/Zone 1
Nitric Oxide	0 - 100 ppm	2.5 - 100 ppm	0.5 ppm	< 5 Sec	< 20 Sec	< +/- 15%	<1% FS / Month	-30 C (-22 F)	50 C (122 F)	Echem	2 Years	1 Year	Div/Zone 1
Nitrogen Dioxide	0 - 10 ppm	1.5 - 10 ppm	0.1 ppm	< 30 Sec	< 60 Sec	< +/- 10%	<1% FS / Month	-40 C (-40 F)	50 C (122 F)	Echem	2 Years	1 Year	Div/Zone 2
Oxygen/Oxygen (FM)	0 - 25%	5 - 25%	0.10%	< 6 Sec	< 11 Sec	< +/- 1% Vol	<0.2 % Vol / Year	-40 C (-40 F)	60 C (140 F)	XCell	5 Years	3 Years	Div/Zone 1
Oxygen (Low)	0 - 25%	2 - 25%	0.10%	< 10 Sec	< 30 Sec	< +/- 10%	<1% FS / Month	-30 C (-22 F)	50 C (122 F)	Echem	2 Years	1 Year	Div/Zone 1
Sulfur Dioxide - 100	0 - 100 ppm	25 - 100 ppm	1 ppm	< 10 Sec	< 30 Sec	< +/- 15%	<1% FS / Month	-30 C (-22 F)	50 C (122 F)	Echem	2 Years	1 Year	Div/Zone 2
Sulfur Dioxide - 25	0 - 25 ppm	5 - 25 ppm	0.1 ppm	< 3 Sec	< 6 Sec	< +/- 1%	<1% FS / Month	-40 C (-40 F)	60 C (140 F)	XCell	5 Years	3 Years	Div/Zone 2

XCell Catalytic Bead Sensors													
Gas	Default Range	Selectable Full Scale Range	Resolution	Response Time*		Repeatability	Zero Drift	Operating Temperature		Sensor Type	Sensor Life	Warranty	Classification
				T50	T90			Min	Max				
Methane (5.0 %)	0 - 100% LEL	20 - 100% LEL	1%	< 10 Sec	< 22 Sec	< +/- 1% LEL	<5% LEL / Year	-55 C (-67 F)	60 C (140 F)	XCell Cat Bead	5 Years	3 Years	Div/Zone 1
Propane (2.1 %)	0 - 100% LEL	20 - 100% LEL	1%	< 10 Sec	< 22 Sec	< +/- 1% LEL	<5% LEL / Year	-55 C (-67 F)	60 C (140 F)	XCell Cat Bead	5 Years	3 Years	Div/Zone 1
Heptane (1.05 %)	0 - 100% LEL	20 - 100% LEL	1%	< 10 Sec	< 22 Sec	< +/- 1% LEL	<5% LEL / Year	-55 C (-67 F)	60 C (140 F)	XCell Cat Bead	5 Years	3 Years	Div/Zone 1
Nonane (0.8 %)	0 - 100% LEL	20 - 100% LEL	1%	< 10 Sec	< 22 Sec	< +/- 1% LEL	<5% LEL / Year	-55 C (-67 F)	60 C (140 F)	XCell Cat Bead	5 Years	3 Years	Div/Zone 1
Hydrogen (4.0 %)	0 - 100% LEL	20 - 100% LEL	1%	< 10 Sec	< 22 Sec	< +/- 1% LEL	<5% LEL / Year	-55 C (-67 F)	60 C (140 F)	XCell Cat Bead	5 Years	3 Years	Div/Zone 1
Methane (4.4 % EN)	0 - 100% LEL	20 - 100% LEL	1%	< 10 Sec	< 22 Sec	< +/- 1% LEL	<5% LEL / Year	-55 C (-67 F)	60 C (140 F)	XCell Cat Bead	5 Years	3 Years	Div/Zone 1
Propane (1.7 % EN)	0 - 100% LEL	20 - 100% LEL	1%	< 10 Sec	< 22 Sec	< +/- 1% LEL	<5% LEL / Year	-55 C (-67 F)	60 C (140 F)	XCell Cat Bead	5 Years	3 Years	Div/Zone 1
Heptane (0.85 % EN)	0 - 100% LEL	20 - 100% LEL	1%	< 10 Sec	< 22 Sec	< +/- 1% LEL	<5% LEL / Year	-55 C (-67 F)	60 C (140 F)	XCell Cat Bead	5 Years	3 Years	Div/Zone 1
Nonane (0.7 % EN)	0 - 100% LEL	20 - 100% LEL	1%	< 10 Sec	< 22 Sec	< +/- 1% LEL	<5% LEL / Year	-55 C (-67 F)	60 C (140 F)	XCell Cat Bead	5 Years	3 Years	Div/Zone 1

*At ambient conditions

S5000 Gas Monitor

Sensor Specifications



Infrared Sensors

Gas	Default Range	Selectable Full Scale Range	Resolution	Response Time*		Repeatability	Zero Drift	Operating Temperature		Sensor Type	Sensor Life	Warranty	Classification
				T50	T90			Min	Max				
IR400 0-100 % LEL Propane	0 - 100% LEL	N/A	1% LEL	< 1.5 Sec	< 3 Sec	+3% LEL @ <50% LEL; +5% LEL @ >50% LEL	N/A	-40 C (-40 F)	75 C (167 F)	IR400	5+ Years	2 Years	Div/Zone 1
IR400 0-100% LEL Hexane	0 - 100% LEL	N/A	1% LEL	< 1.5 Sec	< 3 Sec	+3% LEL @ <50% LEL; +5% LEL @ >50% LEL	N/A	-40 C (-40 F)	75 C (167 F)	IR400	5+ Years	2 Years	Div/Zone 1
IR400 0-100% LEL Pentane	0 - 100% LEL	N/A	1% LEL	< 1.5 Sec	< 3 Sec	+3% LEL @ <50% LEL; +5% LEL @ >50% LEL	N/A	-40 C (-40 F)	75 C (167 F)	IR400	5+ Years	2 Years	Div/Zone 1
IR400 0-100 % LEL Ethylene	0 - 100% LEL	N/A	1% LEL	< 2 Sec	< 4 Sec	+3% LEL @ <50% LEL; +5% LEL @ >50% LEL	N/A	-40 C (-40 F)	60 C (140 F)	IR400	5+ Years	2 Years	Div/Zone 1
IR400 0-100% LEL Butane	0 - 100% LEL	N/A	1% LEL	< 1.5 Sec	< 3 Sec	+3% LEL @ <50% LEL; +5% LEL @ >50% LEL	N/A	-40 C (-40 F)	75 C (167 F)	IR400	5+ Years	2 Years	Div/Zone 1
IR400 0-100% LEL Ethane	0 - 100% LEL	N/A	1% LEL	< 1.5 Sec	< 3 Sec	+3% LEL @ <50% LEL; +5% LEL @ >50% LEL	N/A	-40 C (-40 F)	75 C (167 F)	IR400	5+ Years	2 Years	Div/Zone 1
IR400 0-100% by Volume Methane	0 - 100% LEL	N/A	1% LEL	< 1.5 Sec	< 3 Sec	+3% LEL @ <50% LEL; +5% LEL @ >50% LEL	N/A	-40 C (-40 F)	75 C (167 F)	IR400	5+ Years	2 Years	Div/Zone 1
IR400 0-100 % LEL Methane EN	0 - 100% LEL	N/A	1% LEL	< 1.5 Sec	< 3 Sec	+3% LEL @ <50% LEL; +5% LEL @ >50% LEL	N/A	-60 C (-76 F)	75 C (167 F)	IR400	5+ Years	2 Years	Div/Zone 1
IR400 0-100 % LEL Propane EN	0 - 100% LEL	N/A	1% LEL	< 1.5 Sec	< 3 Sec	+3% LEL @ <50% LEL; +5% LEL @ >50% LEL	N/A	-60 C (-76 F)	75 C (167 F)	IR400	5+ Years	2 Years	Div/Zone 1
IR400 0-100% LEL Hexane EN	0 - 100% LEL	N/A	1% LEL	< 1.5 Sec	< 3 Sec	+3% LEL @ <50% LEL; +5% LEL @ >50% LEL	N/A	-60 C (-76 F)	75 C (167 F)	IR400	5+ Years	2 Years	Div/Zone 1
IR400 0-100 % LEL Ethylene EN	0 - 100% LEL	N/A	1% LEL	< 2 Sec	< 4 Sec	+3% LEL @ <50% LEL; +5% LEL @ >50% LEL	N/A	-40 C (-40 F)	60 C (140 F)	IR400	5+ Years	2 Years	Div/Zone 1
IR400 0-100% LEL Butane EN	0 - 100% LEL	N/A	1% LEL	< 1.5 Sec	< 3 Sec	+3% LEL @ <50% LEL; +5% LEL @ >50% LEL	N/A	-60 C (-76 F)	75 C (167 F)	IR400	5+ Years	2 Years	Div/Zone 1
IR400 0-100% LEL Ethane EN	0 - 100% LEL	N/A	1% LEL	< 1.5 Sec	< 3 Sec	+3% LEL @ <50% LEL; +5% LEL @ >50% LEL	N/A	-60 C (-76 F)	75 C (167 F)	IR400	5+ Years	2 Years	Div/Zone 1
IR700 0-2000 ppm Carbon Dioxide	0-2000 ppm	N/A	1% LEL	< 4 Sec	< 9 Sec	+5% FS @ <50% FS; +10% FS @ >50% FS	N/A	-40 C (-40 F)	50 C (122 F)	IR700	5+ Years	2 Years	Div/Zone 1
IR700 0-5000 ppm Carbon Dioxide	0-5000 ppm	N/A	1% LEL	< 4 Sec	< 9 Sec	+5% FS @ <50% FS; +10% FS @ >50% FS	N/A	-40 C (-40 F)	50 C (122 F)	IR700	5+ Years	2 Years	Div/Zone 1
IR700 0-10000 ppm Carbon Dioxide	0-10000 ppm	N/A	1% LEL	< 4 Sec	< 9 Sec	+5% FS @ <50% FS; +10% FS @ >50% FS	N/A	-40 C (-40 F)	50 C (122 F)	IR700	5+ Years	2 Years	Div/Zone 1
IR700 0-30000 ppm Carbon Dioxide	0-30000 ppm	N/A	1% LEL	< 4 Sec	< 9 Sec	+5% FS @ <50% FS; +10% FS @ >50% FS	N/A	-40 C (-40 F)	50 C (122 F)	IR700	5+ Years	2 Years	Div/Zone 1
IR700 0-50000 ppm Carbon Dioxide	0-50000 ppm	N/A	1% LEL	< 4 Sec	< 9 Sec	+5% FS @ <50% FS; +10% FS @ >50% FS	N/A	-40 C (-40 F)	50 C (122 F)	IR700	5+ Years	2 Years	Div/Zone 1

Passive Sensors

Gas	Default Range	Selectable Full Scale Range	Resolution	Response Time*		Repeatability	Zero Drift	Operating Temperature		Sensor Type	Sensor Life	Warranty	Classification
				T50	T90			Min	Max				
10058-1	0 - 100% LEL	N/A	1% LEL	< 10 sec	< 30 sec	+3% LEL @ <50% LEL; +5% LEL @ >50% LEL	<5% FS / Year	-40 C (-40 F)	75 C (167 F)	Cat Bead Screened	3-5 Years	2 Years	Div/Zone 1
11159-8	0-20% LEL	N/A	1% LEL	< 10 sec	< 30 sec	+3% LEL @ <50% LEL; +5% LEL @ >50% LEL	<5% FS / Year	-40 C (-40 F)	70 C (158 F)	Cat Bead Sintered	3-5 Years	2 Years	Div/Zone 1
11159-1	0 - 100% LEL	N/A	1% LEL	< 10 sec	< 30 sec	+3% LEL @ <50% LEL; +5% LEL @ >50% LEL	<5% FS / Year	-40 C (-40 F)	70 C (158 F)	Cat Bead Sintered	3-5 Years	2 Years	Div/Zone 1
50448-9	0-20 ppm	N/A	1 ppm	< 14 sec	n/a	+ 2 ppm or 10% of applied gas	N/A	-40 C (-40 F)	75 C (167 F)	MOS Screened	3-5 Years	2 Years	Div/Zone 1
50448-5	0-50 ppm	N/A	1 ppm	< 14 sec	n/a	+ 2 ppm or 10% of applied gas	N/A	-40 C (-40 F)	75 C (167 F)	MOS Screened	3-5 Years	2 Years	Div/Zone 1
50448-1	0-100 ppm	N/A	1 ppm	< 14 sec	n/a	+ 2 ppm or 10% of applied gas	N/A	-40 C (-40 F)	75 C (167 F)	MOS Screened	3-5 Years	2 Years	Div/Zone 1
51457-9	0-20 ppm	N/A	1 ppm	< 30 sec	n/a	+ 2 ppm or 10% of applied gas	N/A	-40 C (-40 F)	70 C (158 F)	MOS Sintered	3-5 Years	2 Years	Div/Zone 1
51457-5	0-50 ppm	N/A	1 ppm	< 30 sec	n/a	+ 2 ppm or 10% of applied gas	N/A	-40 C (-40 F)	70 C (158 F)	MOS Sintered	3-5 Years	2 Years	Div/Zone 1
51457-1	0-100 ppm	N/A	1 ppm	< 30 sec	n/a	+ 2 ppm or 10% of applied gas	N/A	-40 C (-40 F)	70 C (158 F)	MOS Sintered	3-5 Years	2 Years	Div/Zone 1

*At ambient conditions

Product Specifications	
COMBUSTIBLE GAS SENSOR TYPE	Catalytic bead (Passive comb., XCell comb.) Infrared (IR400)
TOXIC GAS & OXYGEN SENSOR TYPE	XCell Toxic Ammonia (NH ₃), Carbon Monoxide (CO), Carbon Monoxide (CO) H ₂ -resistant, Chlorine (Cl ₂), Sulfur Dioxide (SO ₂) Passive MOS, Echem, XCell Toxic Hydrogen Sulfide (H ₂ S) XCell O₂ Oxygen (O ₂) Infrared Carbon Dioxide (CO ₂) Electrochem Ammonia (NH ₃), Hydrogen (H ₂), Hydrogen Chloride (HCl), Hydrogen Cyanide (HCN), Nitric Oxide (NO), Nitrogen Dioxide (NO ₂)
SENSOR MEASURING RANGES	Combustible 0-100% LEL (CB, IR) Cl₂ 0-5, 0-10, 0-20 ppm CO 0-100, 0-500, 0-1000 ppm CO, H₂-resistant 0-100 ppm CO₂ 0-2000, 0-5000, 0-10000, 0-30000, 0-50000 ppm H₂ 0-1000 ppm HCl 0-50 ppm HCN 0-50 ppm H₂S 0-10, 0-20, 0-50, 0-100, 0-500 ppm NH₃ 0-100 ppm, 0-1000 ppm NO 0-100 ppm NO₂ 0-10 ppm O₂ 0-25% SO₂ 0-25, 0-100 ppm
APPROVALS CLASSIFICATION DIVISIONS (US/CAN)	See manual for complete CSA listings. Class I, Div/Zone 1&2, Groups A, B, C & D T5/T4; Class II, Div/Zone 1&2, Groups E, F & G, T6; Class III Type 4X, IP66
US ZONES	Class I, Zone 1 AEx db IIC T5 Gb Class I, Zone 2 AEx nA nC IIC T4 Gc Zone 21 AEx tb IIIC T85°C Db
CANADIAN ZONES/ ATEX/ IECEx	Ex db IIC T5 Gb Ex nA nC IIC T4 Gc Ex tb IIIC T85°C Db
CE MARKING DIRECTIVES	Complies with EMC, RED, ATEX
WARRANTY	S5000 transmitter 2 years XCell Sensors 3 years Passive comb., MOS, IR400, IR700 2 years Echem Sensors Varies by gas
APPROVALS	CSA, FM**, ATEX, IECEx, INMETRO, ABS, DNV-GL Marine, CE Marking. Complies with C22.2 No. 152, FM 6320, ANSI/ISA/CSA/IEC/EN 60079-29-1, ANSI/ ISA 12.13.01. Suitable for SIL 2.
Dimensions	
HOUSING (W x H x D)	6.37" x 5.38" x 4.25" (162 x 137 x 108 mm)
W/PASSIVE SENSOR	6.37" x 7.62" x 4.25" (162 x 193 x 108 mm)
W/DIGITAL SENSOR	6.37" x 10.4" x 4.25" (162 x 265 x 108 mm)
W/IR400 IR SENSOR	14.8" x 6.0" x 4.25" (375 x 152 x 108 mm)
WEIGHT	8 lb. (3.6 kg), 316 SS

Environmental Specifications		
OPERATING TEMPERATURE RANGE	Transmitter -55°C to +75°C CB (sintered, Zones) -40°C to +70°C CB (screened, Div) -40°C to +75°C MOS (sintered, Zones) -40°C to +70°C MOS (screened, Div) -40°C to +75°C IR (CSA) -40°C to +75°C IR (ATEX/IECEx) -60°C to +75°C XCell (Comb) -55°C to +60°C XCell (Toxic/O₂) -40°C to +60°C	
STORAGE TEMPERATURE RANGE	Housing, IR400, IR700, passive sensors -50°C to +85°C XCell sensors -40°C to +60°C	
RELATIVE HUMIDITY (NON-CONDENSING)	XCell sensors, IR400, IR700 10-95% Passive combustible 0-95% Passive H₂S 15-95%	
Mechanical Specifications		
INPUT POWER	24 VDC nominal, 12 to 30 VDC	
SIGNAL OUTPUT	Dual 4-20 mA current source or sink, HART, Modbus, Bluetooth. <i>Optional: w/o Bluetooth</i>	
RELAY RATINGS	5A @ 30VDC; 5A @220 VAC (3X) SPDT – fault, warn, alarm	
RELAY MODES	Common, discrete, horn	
NORMAL MAX POWER		Without Relays With Relays
	Passive comb.	5.0 W 6.0 W
	Passive MOS	9.8 W 10.8 W
	IR400/IR700	7.9 W 8.9 W
	XCell comb.	5.0 W 6.0 W
	XCell toxic & O₂	2.6 W 3.6 W
	IR400/IR700 + XCell comb.	10.8 W 11.8 W
	IR400/IR700 + XCell toxic or O₂	8.6 W 9.6 W
	Dual XCell toxic or O₂	3.3 W 4.3 W
	Dual XCell comb.	7.4 W 8.4 W
	XCell comb. + XCell toxic or O₂	5.7 W 6.7 W
STATUS INDICATORS	4-digit scrolling LED, icons depicting fault, warn, alarm, Bluetooth, 1 and 2 to indicate sensor reading displayed	
RS-485 OUTPUT	Modbus RTU, suitable for linking up to 128 units or up to 247 units with repeaters	
BAUD RATE	2400, 4800, 9600, 19200, 38400, 115200	
HART	HART 7, Device Description (DD) and Device Type Manager (DTM) available	
FAULTS MONITORED	Low supply voltage, RAM checksum error, flash checksum error, EEPROM error, internal circuit error, relay, invalid sensor configuration, sensor faults, calibration faults, analog output mismatch fault	
CABLE REQUIREMENTS	3-wire shielded cable for single sensor and 4-wire shielded cable for dual sensor configurations. Accommodates up to 12 AWG or 4 mm ² <i>Refer to manual for mounting distances.</i>	

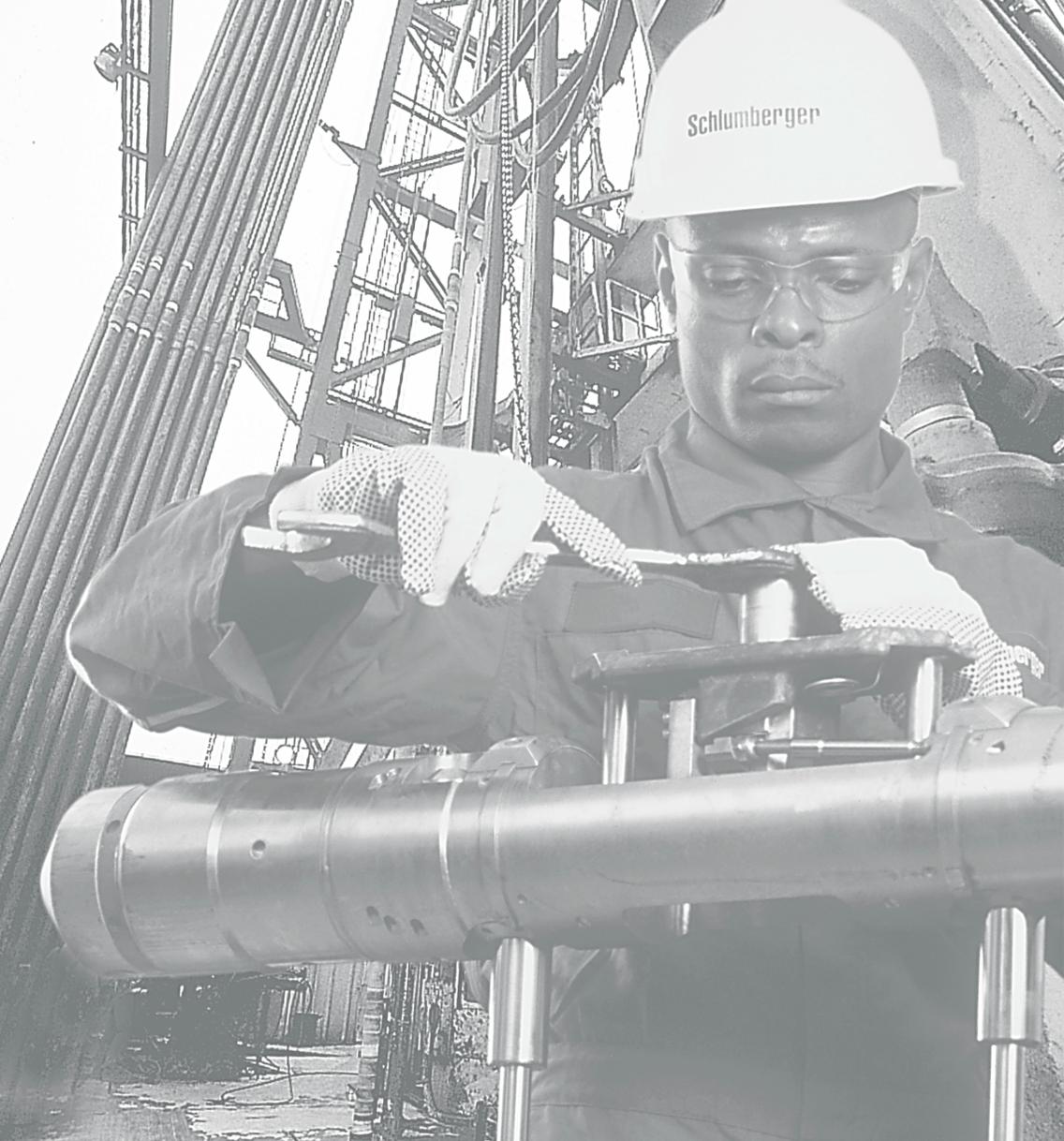
** See manual for FM-approved sensors

Specifications subject to change without notice.

MSA operates in over 40 countries worldwide. To find an MSA office near you, please visit MSAsafety.com/offices.

APPENDIX D-2

SCHLUMBERGER MDT BROCHURE



Schlumberger

MDT Modular Formation Dynamics Tester



Quality fluid samples
and highly accurate
reservoir pressures

Applications

- Formation pressure measurement and fluid contact identification
- Formation fluid sampling
- Permeability measurement
- Permeability anisotropy measurement
- Mini-drillstem test (DST) and productivity assessment
- In-situ stress and minifrac testing

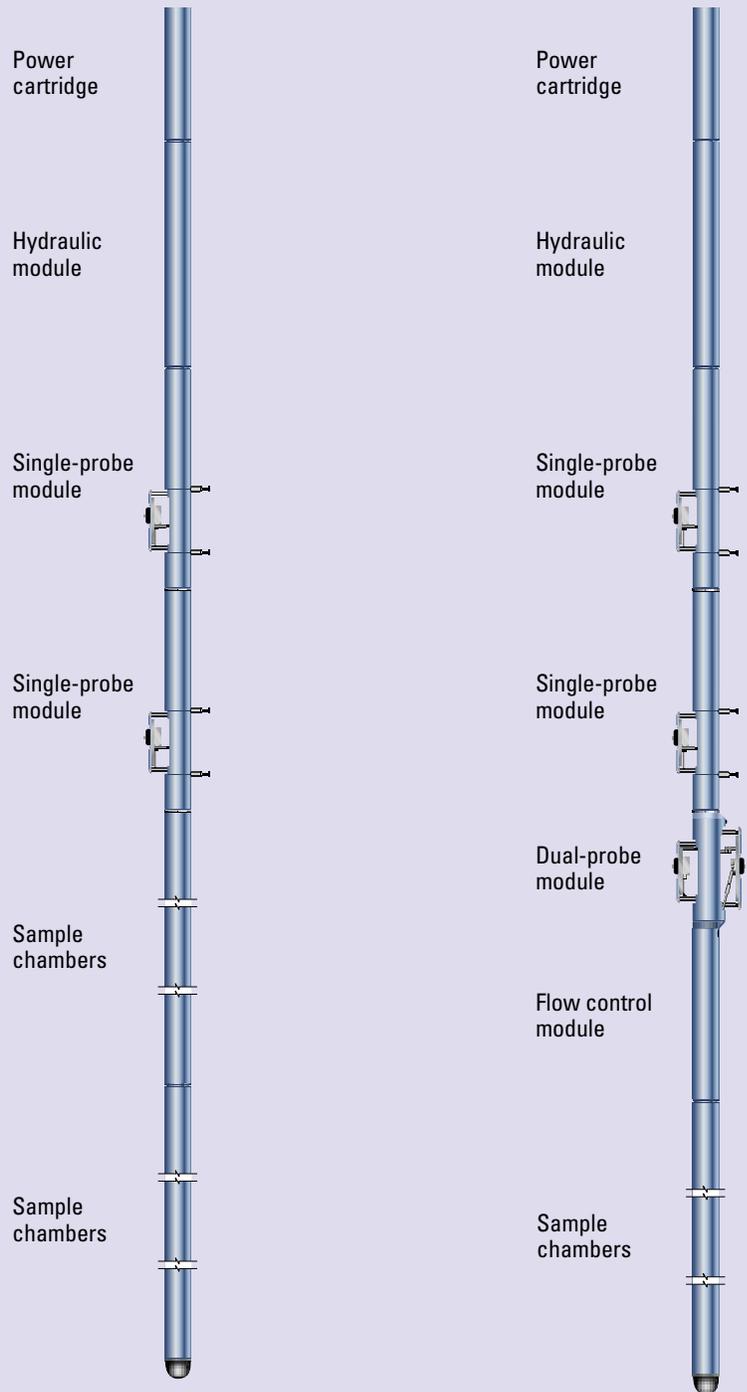
Benefits

- Testing and sampling in low permeability, laminated, fractured, unconsolidated and heterogeneous formations
- Fast, repeatable pressure measurements
- Faster tests in low permeability—reduced seal losses and probe plugging
- Pressure, volume and temperature (PVT) formation fluid samples
- Downhole fluid differentiation
- Real-time fluid gradients, permeability and contamination assessment

Features

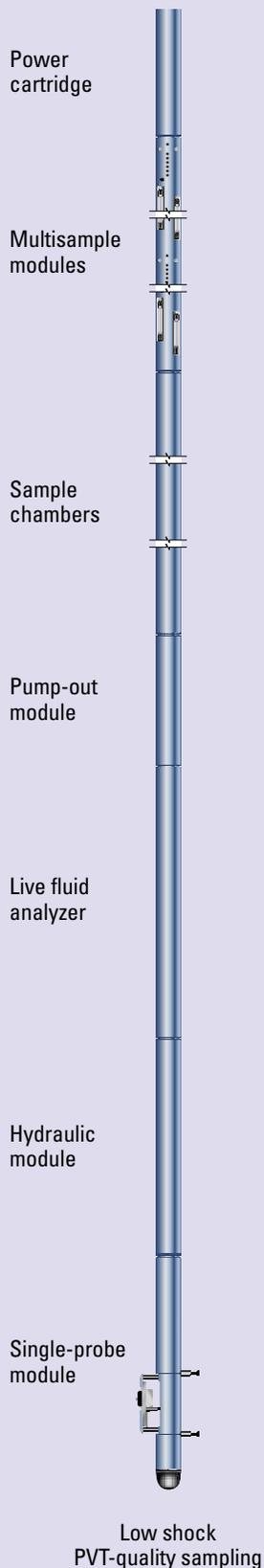
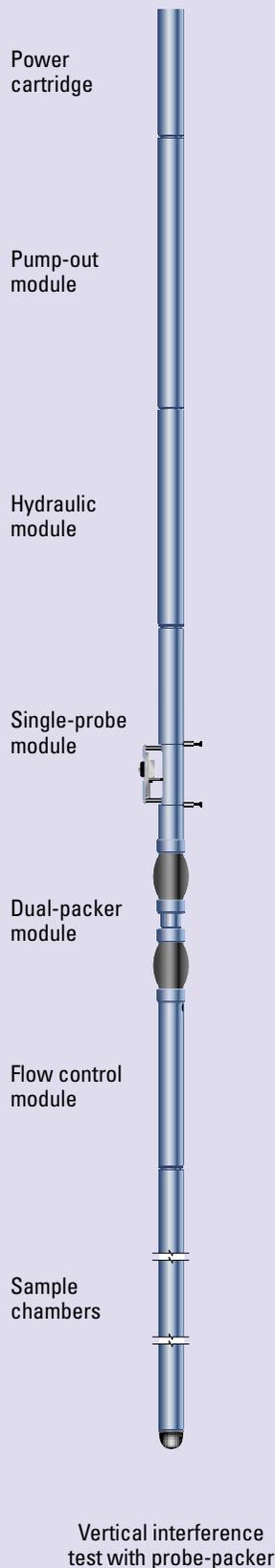
- Modular, custom-design capability
- Multiple samples in one trip
- Multiprobe and inflatable dual packer module options
- Efficient integration with other tools
- Accurate pressure measurements using a CQG* Crystal Quartz Gauge
- Programmable pretest pressure, rate and volume
- Filtrate pumpout prior to sampling
- Fluid resistivity and temperature measurements at the probe
- Quantitative sample contamination measurement with optical spectroscopy techniques
- Low-shock and single-phase sampling
- Field-proven database for accurate pumpout time

The MDT tool can be customized and efficiently assembled on-site to meet exact requirements depending on the needs of a particular well evaluation.



Basic MDT configuration for pressure, permeability and sampling

Multi-probe vertical interference testing



Real-time measurements

The Schlumberger MDT* Modular Formation Dynamics Tester tool provides fast and accurate pressure measurements and high-quality fluid sampling. It can also measure permeability anisotropy. In a single trip, the MDT tool is able to acquire most of the data requirements needed for accurate and timely decision making.

Flexibility

The key to this remarkable tool is an innovative, modular design that lets you customize the tool for the required applications. MDT modules combine to meet the exact needs and goals of the data acquisition program. This designed flexibility makes the tool compatible with almost all Schlumberger measurement technologies and allows the MDT tool to evolve as new measurement techniques, technologies and options evolve.

Quick, accurate pressure and permeability measurements

Reservoir pressure measurements using a wireline tester require inserting the probe into the reservoir and withdrawing a small amount of fluid. Since the pressure gauge is exposed to many temperature and pressure changes, these measurements require accurate gauges with high resolution that can dependably react to the dynamic conditions.

The MDT tool uses highly accurate gauges with best-in-class resolution, repeatability and dynamic response for pressure measurements. These pressure gauges exhibit excellent response with no compromise in accuracy or resolution. Precise flowline control during testing and sampling ensures monophasic flow. These innovative features provide the most efficient and accurate permeability determination available.

MDT modules

Electronic power module

The power cartridge (MRPC) converts AC power from the surface to provide DC power for all modules in the tool. It is an essential part of any MDT configuration.

Hydraulic power module

The hydraulic power module (MRHY) contains an electric motor and hydraulic pump to provide hydraulic power for setting and retracting the single- and dual-probe modules. The MRHY module features an accumulator that allows the test probes to autoretract and prevent a stuck-tool situation in the event of a power failure.

Single-probe module

The single-probe module (MRPS) contains the probe assembly, (with packer and telescoping backup pistons), the pressure gauges, fluid resistivity and temperature sensors, and a 20-cc pretest chamber. The MRPS also contains a strain gauge and an accurate, high-resolution, quick-response CQG gauge. The volume, rate and drawdown of this chamber can be controlled from the surface to adjust to any test situation, especially in tight formations.

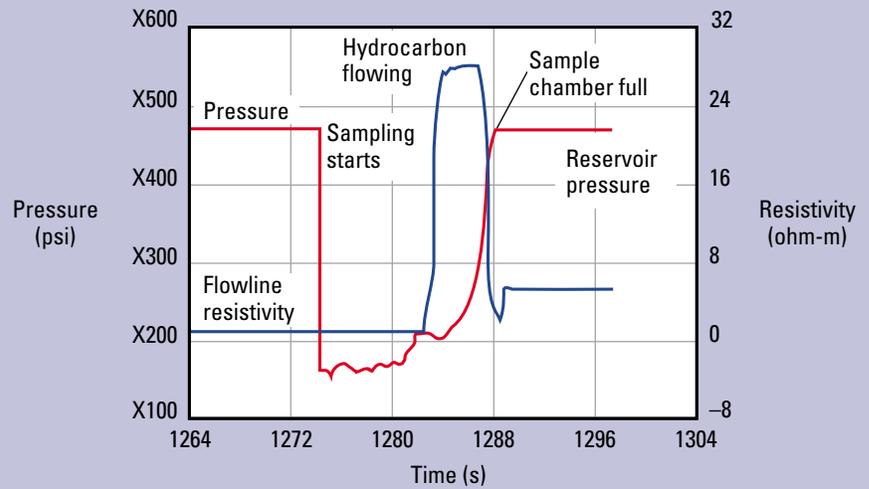
Dual-probe module

The dual-probe module (MRPD) contains two probes mounted back-to-back, 180° apart on the same block. When combined with an MRPS module, it forms a multiprobe system capable of determining horizontal and vertical permeability.

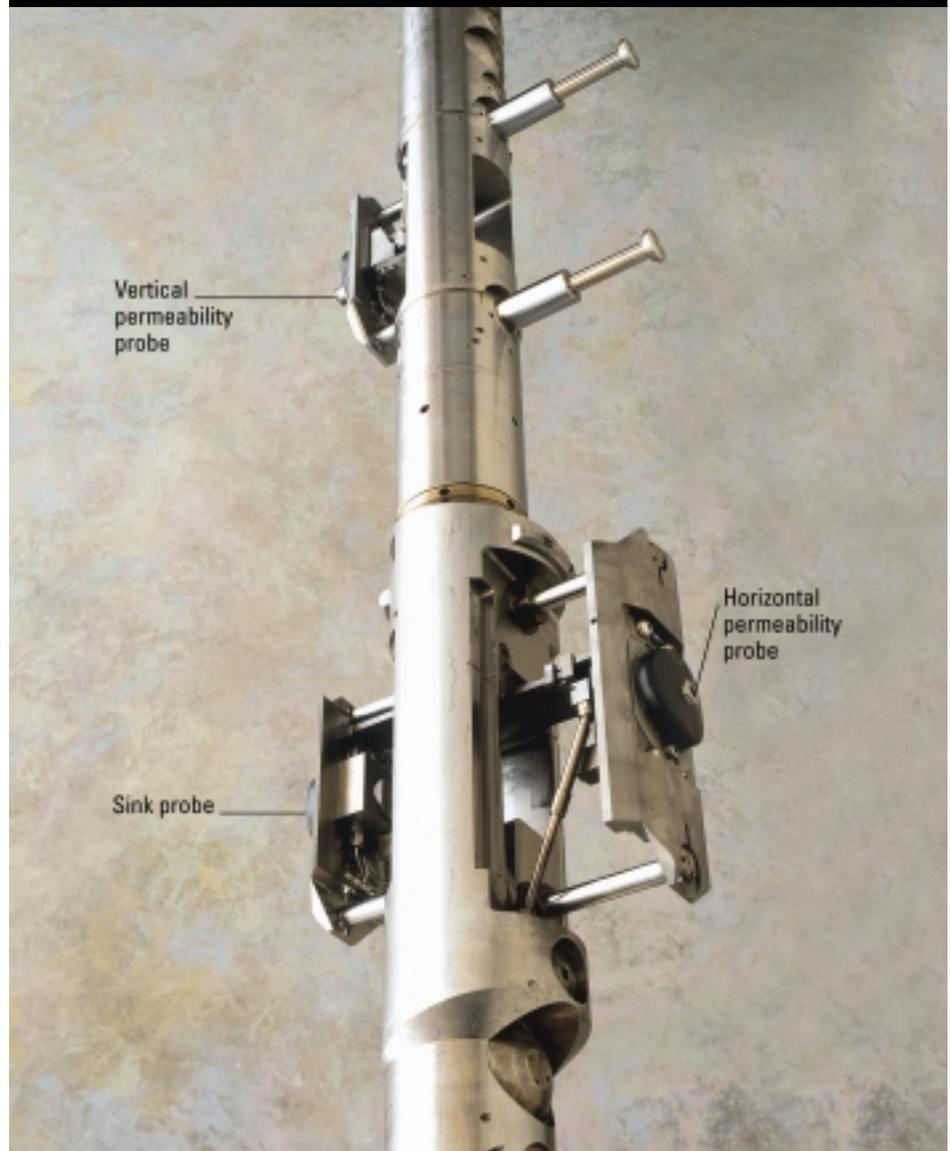
During a typical test with the MRPD module, formation fluid is diverted through the sink probe to a one-liter pretest chamber in the flow control module. The MRPD module, in conjunction with the pressure measured at the vertical probe from the MRPS module, measures the pressure at both probes. These measurements are used to determine near-wellbore permeability anisotropy.

Flexible probe configurations are a unique feature of the MDT tool. By running multiple probe modules, pressure communication between adjacent formations can be monitored during an interference test. The MDT multiprobe configuration also allows in-situ verification of gauge quality and utilization of two different probe assemblies for redundancy in difficult conditions.

In a water-based mud environment, the MDT flowline resistivity measurement helps discriminate between fluid contaminated by mud filtrate and formation oil or fresh water.



The multiprobe configuration of the MDT tool measures the pressure response at two or more locations in addition to the single probe data. Data from the MDT multiprobe configuration provide an evaluation of horizontal and vertical permeabilities and formation heterogeneity.



The MRPA module employs two inflatable packers to isolate a borehole interval for testing. Tests in low-permeability formations are greatly enhanced, because the cross-sectional area of the isolated interval is many times greater than that of the standard MDT probe.



Dual-packer module

The dual-packer module (MRPA) uses two inflatable packers, set against the borehole wall, to isolate a 3 to 11 ft. section of the formation and provide access to the formation over a wall area that is thousands of times larger than the standard probe area. This allows fluids to be withdrawn at a higher rate without dropping below the bubble point, and it provides a permeability estimate with a radius of investigation in the range of tens of feet. The MRPA is useful for making pressure measurements and taking fluid samples in difficult conditions (tight, vuggy, fractured and unconsolidated formations) and has also been used in cased holes after a perforation operation. In addition, the MRPA module can be used for in-situ stress testing and mini-frac testing.

Modular sample chamber

The Modular Sample Chamber (MRSC) is available in three sizes: 1 gal, 2.75 gal and 6 gal. The upper block of each chamber contains a throttle valve that can be operated fully open, fully closed or in throttle mode. The 1- and 2.75-gal chambers exist in both H₂S and non-H₂S versions. The 6-gal chamber can be expanded in 6-gal increments to act as dump chambers by adding more 6-gal cylinders.

Multisample module

The Multisample Module (MRMS) allows the collection of high-quality samples for PVT analysis. The module is designed to retrieve six formation fluid samples, 450-cc each, during a single trip into the well. Sample bottles detach easily from the tool for transport to a PVT laboratory. The bottles meet transportation regulations for shipping pressurized vessels, so no wellsite transfer is necessary.

Since multiple MRSC and MRMS modules can be combined, the total number of sample modules is limited only by cable strength and well conditions. For longer tool strings, as well as highly deviated and horizontal wells, the MDT tool can be combined with the TLC* Tough Logging Conditions system for efficient sampling operations.

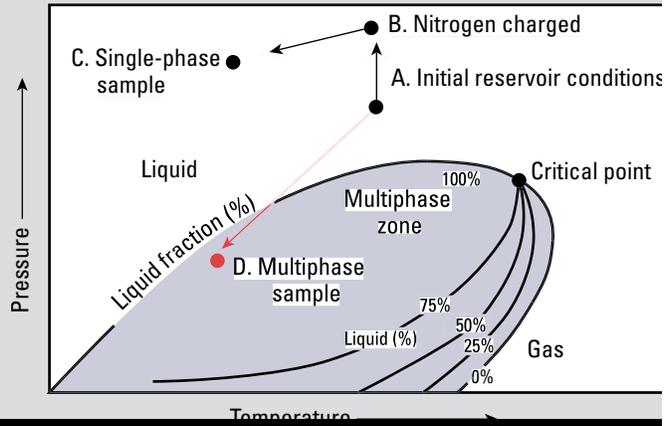
Multiple MRMS modules—each capable of collecting six high-quality PVT samples—can be combined in one run to meet sampling requirements.



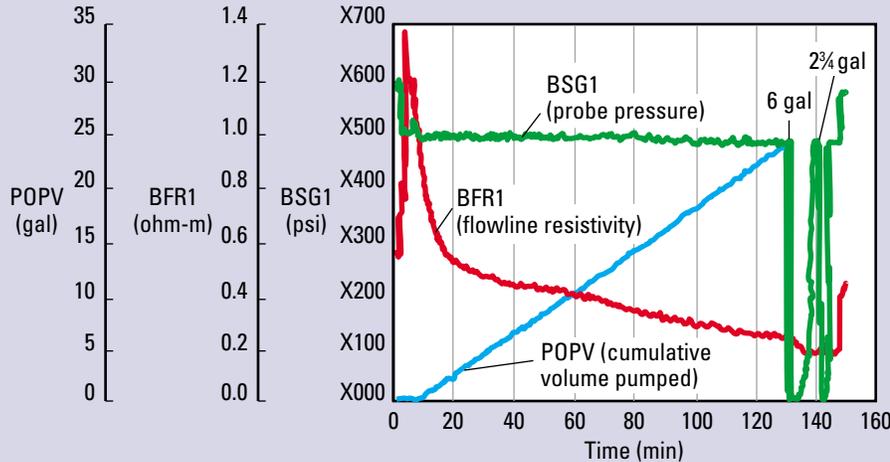
Chemical analysis of MDT-acquired samples helps to characterize the reservoir fluid and facilitates optimal completion and surface facilities design.



As they are brought to the surface, samples taken at reservoir temperature and pressure (A) can change phase at lower temperatures and pressures (D). Overpressuring the sample downhole (B) will maintain its initial phase as it is brought to the surface (C) at a lower temperature.



In oil-based mud environments, flowline resistivity may also aid in formation water sampling.



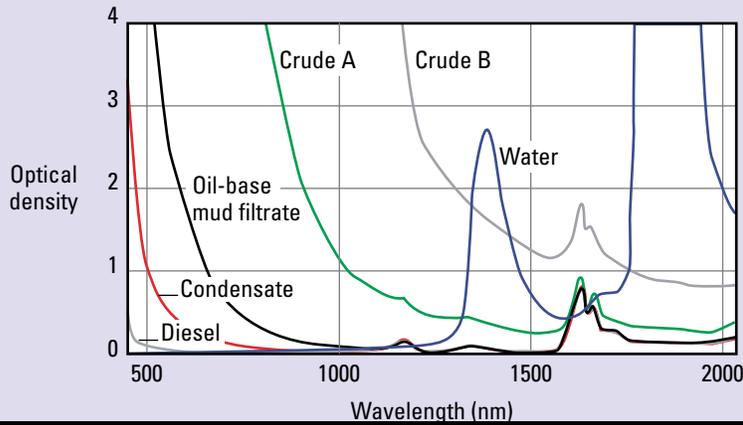
Single-phase multisample chamber

The single-phase multisample chamber ensures collection of monophasic fluid samples by overpressuring samples after they are taken at reservoir conditions. Sample chambers are pressurized with a nitrogen gas chamber across two pistons. This compensates for the temperature-induced pressure drop as the samples are returned to the surface.

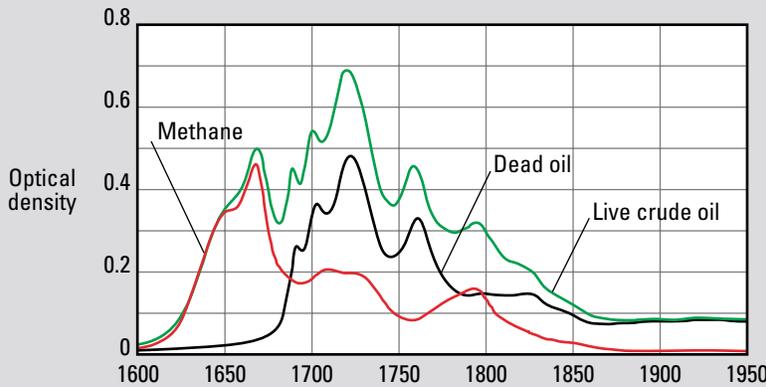
Pump-out module

The Pump-Out Module (MRPO) is used to pump unwanted fluid (mud filtrate) from the formation to the borehole, so representative samples can be taken. It is also used to pump fluid from the borehole into the flowline for inflating the packers of the MRPA module. In addition, the module can pump within the tool, for example, from a sample chamber to the inflatable packers.

Optical density spectra can be used to uniquely identify different fluids.



The graph below illustrates the optical density (OD) of methane, dead oil and live crude oil. An OD of zero means there is full transmission (no absorption) of light. An OD of 1 means that 10% of the light is transmitted, and 90% is absorbed. Methane and dead oil peaks are prominently shown in the live crude oil spectrum.



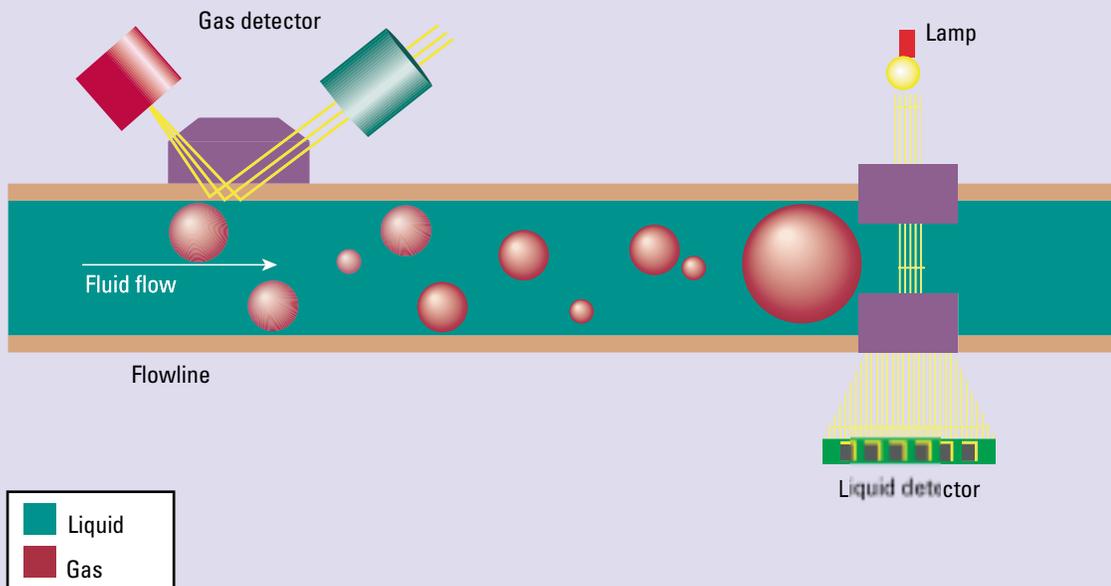
The LFA module provides real-time downhole fluid analysis by measuring multiple optical properties of the fluid to quantify the amount of reservoir and drilling fluids in the flowline.

Live fluid analyzer module

Downhole fluid analysis in real time, as provided by the LFA* Live Fluid Analyzer module, enhances the usefulness of new techniques like pumpout and dual inflatable packers. The LFA module measures optical properties of the fluid in the flowline.

The LFA module employs an absorption spectrometer that utilizes visible and near infrared light to quantify the amount of reservoir and drilling fluids in the flowline. Light is transmitted through the fluid as it flows past the LFA spectrometer. The amount of light absorbed by the fluid depends on the composition of the fluid. Water and oil are reliably detected by their unique absorption spectra. A second sensor in the LFA module is the gas refractometer, which can be used to differentiate between gas and liquid.

Optical absorption in the visible and near infrared region is used for fluid discrimination and quantification; the change in index of refraction is used for free gas detection; and methane presence is used for both contamination monitoring and gas detection.



Flow control module

The Flow Control Module (MRCF) is a 1-liter pretest chamber where the flow rate can be accurately measured and controlled. The MRCF can also be used during sampling that requires a controlled flow rate. The volume is limited to 1 liter. The module creates a pressure pulse in the formation large enough for multi-probe measurements.

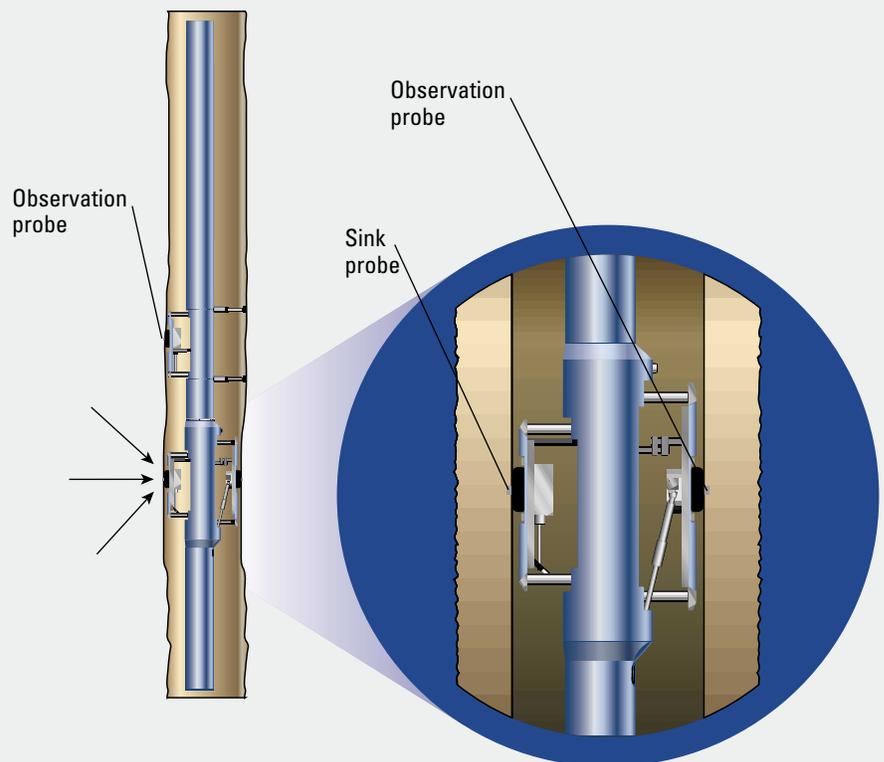
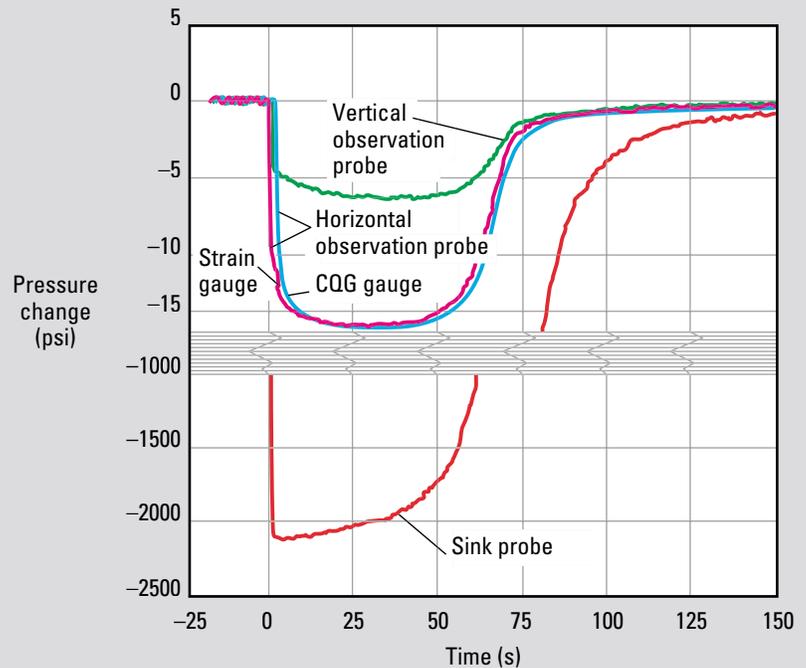
Prejob modeling and real-time answers

The software capabilities of the MDT tool enhance its hardware capabilities. Drawing on experience based on the vast number of MDT projects that have been completed over the past decade, programs are available to accurately plan and execute new MDT jobs. Highly sophisticated interpretation programs generate accurate pressure gradient, permeability and fluid sampling answers when they are needed.

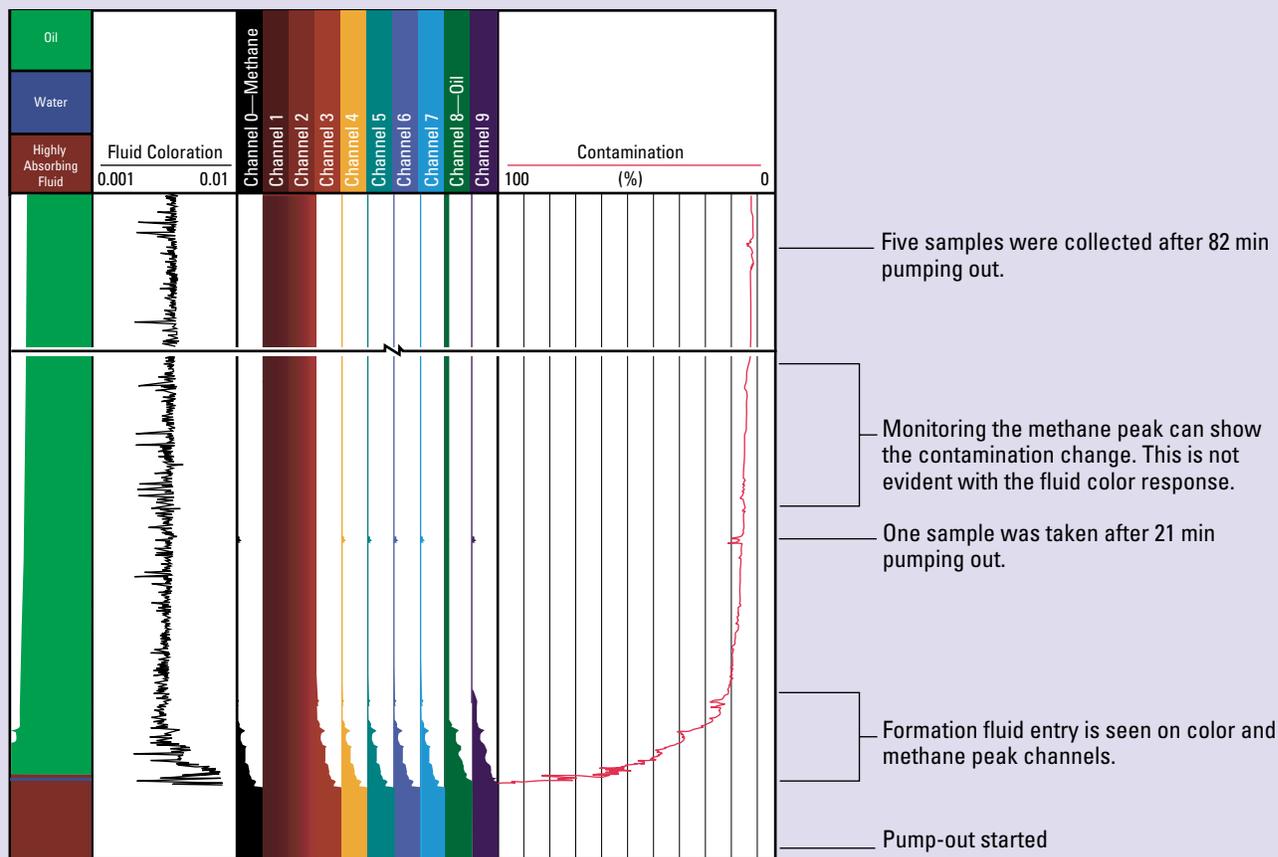
Planning programs are also available to predict the response of the different gauges under any given environment and for any tool configuration. These programs also predict the duration of required pumping time and the likelihood of sticking in any given situation. These expert systems, based on the huge MDT job database, help optimize the running of the job. In the unlikely event that sticking does occur, the LWF* logging while fishing technique can be used to simultaneously complete the survey on drillpipe and safely retrieve the stuck string.

MDT interpretation software provides real-time plotting of pressure, resistivity and optical properties versus time. These plots generate derivatives and perform interpretation at the wellsite. This capability is essential for real-time quality control and ongoing optimization of the job. Using the InterACT* wellsite monitoring and control system for real-time data transfer to remote sites, Schlumberger and customer experts can simultaneously apply more sophisticated and elaborate modeling and interpretation software offsite.

The Flow Control Module contains a one-liter pretest chamber and metering valves capable of producing finely tuned drawdowns.



The LFA module monitors oil-based mud contamination by analyzing fluid color and methane content to ensure quality fluid sampling. Color and methane curves indicate the percentage of fluid contamination.



Fluid identification example

The purpose of fluid sampling is to obtain a representative sample of the virgin reservoir fluid. To obtain the sample, the unwanted fluid must be discarded prior to collecting the formation fluid sample. There also must be a method to analyze and determine the nature of the fluid in real time. The MDT tool with the pump-out module, LFA module and the flowline resistivity measurement identifies and collects high-quality reservoir fluid samples suitable for further laboratory analysis.

Flowline resistivity measurements taken by the probe module help discriminate between formation fluids and filtrate from water- and oil-base muds. Equipping the MDT tool with a pump-out module makes it possible to sample fluid, while monitoring the flowline resistivity, by pumping filtrate-contaminated fluid into the mud column. Fluid removed from the formation is excluded from the sample chamber until an uncontaminated sample can be recovered.

MDT Specifications

Single-probe configuration

OD	4.75 in. [120.6 mm]
Min hole size	5 $\frac{7}{8}$ in. [149.2 mm] [†]
Max without kits	14.25 in. [361.5 mm]
Max with kits	24 in. [610 mm]
Pressure rating	25,000 psi [17,235 kPa] [‡]
Max temperature rating	400°F [205°C] [§]

Multiprobe tool configuration

OD	6.00 in. [152.4 mm]
Min hole size	7.62 in. [193.6 mm]
Max without kit	13.75 in. [336.5 mm]
Max with kit	15.00 in. [381.00 mm]
Max pressure rating	25,000 psi [17,235 kPa]
Max temperature rating	400°F [205°C]

Dual-packer configuration

OD	5.00 to 10.00 in. [127.0 to 254 mm] ^{††}
Min hole size	5 $\frac{7}{8}$ in. [149.2 mm] ^{††}
Max hole size	14.75 in. [374.6 mm] ^{††}
Pressure rating	25,000 psi [17,235 kPa]
Max temperature rating	325°F [163°C] ^{††}

LFA module

OD	4.75 in. [120.6 mm]
Length	5.83 ft [1.7 m]
Weight	161 lbm [73 kg]
Range	0 to 5 optical density
Accuracy	0.01 optical density
Pressure rating	25,000 psi [17,236 kPa]
Temperature rating	350°F [176°C]

Pressure gauge specifications

Strain gauge

Range	0 to 25,000 psi [0 to 17,236 kPa] ^{††}
Accuracy	0.10% full scale
Repeatability	0.06% full scale
Resolution	0.1 psi [0.689 kPa]
Temperature rating	400°F [205°C] ^{††}

CQG gauge

Range	0 to 25,000 psi ^{††}
Accuracy	2.0 psi [13.8 kPa]+ 0.01% of reading
Repeatability	< 1.0 psi
Resolution	0.01 psi
Temperature rating	400°F [205°C] ^{††}

[†] If wellbore conditions are favorable, the tool can be run on TLC in holes with an ID as small as 5 $\frac{1}{8}$ in. [14 cm].

[‡] 25,000 psi [172.5 mPa] for the high pressure MDT and 20,000 psi [138 mPa] for the normal MDT tool

[§] 350°F [175°C] with some CQG types

^{††} Functional rating based on the actual packer installed and type of mud used.

⁺⁺ Actual pressure/temperature combination will depend on specific type of gauge. For the CQG, HCQG-A is rated 175°C/25,000 psi, HCQG-B/D 200°C/18,000 psi or 180°C/20,000 psi and CQG-C/G 175°C/15,000 psi.

APPENDIX D-3

SCHLUMBERGER DUAL PACKER MODULE SPECIFICATIONS GUIDELINES

Dual-Packer Module

Inflatable packers that seal against the borehole wall to isolate the interval for MDT tester operations

APPLICATIONS

Used with the MDT* modular formation dynamics tester for

- Downhole fluid analysis (DFA)
- Formation fluid sampling
- Formation pressure measurement and fluid gradient estimation
- Determination of pretest drawdown mobility (permeability/viscosity)
- Permeability and anisotropy determination away from the well
- In situ stress determination

High-performance packers

The Dual-Packer Module (MRPA) of the MDT modular formation dynamics tester consists of two inflatable packer elements that seal against the borehole wall to isolate an interval, improving the effectiveness of pressure measurement and fluid sampling in low-permeability, laminated, or fractured formations.

High-performance packers are run with the MRPA to expand the MDT tester's operating envelope, with a temperature rating to 410 degF [210 degC] and compatibility with both water- and oil-base mud systems. The superior elasticity and improved durability of the high-performance packers enable performing more stations per run and lessen packer replacement. The asymmetrical packer design reduces sticking and bulging potential.

Operational reliability is further enhanced by the autoretract mechanism (ARM), which applies a longitudinal tensile force to assist in retracting the packers after deflation, in turn minimizing drag. At temperatures below 225 degF [107 degC], the elements retain enough elasticity for operation without the ARM.

The MDT Pumpout Module (MRPO) is used to inflate the packers with fluid.

Reliability in high-H₂S environments

For operations in H₂S environments, the Dual-Packer Module is available in a NACE-compliant version for sampling up to 50% H₂S in hole sizes from 5½ to 9½ in.

Effective isolation of large areas

The length of the test interval between the packers is 3.2 ft [0.98 m] and can be extended to 5.2, 8.2, or 11.2 ft [1.58, 2.5, or 3.41 m] by using 2- and 3-ft [0.61- and 0.91-m] spacers with large-diameter mandrels. For the 3.2-ft interval, the area of the isolated interval of the borehole is about 3,000 times larger than the area of the borehole wall isolated by the MDT tester's Single-Probe Module (MRPS). For fluid sampling, the large area results in flowing pressures that are only slightly below the reservoir pressure, which avoids phase separation even for pressure-sensitive fluids such as gas condensates or volatile oils. In low-permeability formations, high drawdown usually occurs with the probe, whereas fluid can be withdrawn from the formation using the MRPA with minimum pressure drop through the larger flowing area. In finely laminated formations, the MRPA can be used to straddle permeable streaks that would be difficult to locate with a probe. In fractured formations, the MRPA can usually seal the interval whereas a probe could not.



Dual-Packer Module.

Dual-Packer Module

For pressure transient testing, following a large-volume flow from the formation, the resulting pressure buildup has a radius of investigation of 50 to 80 ft [15 to 24 m]. Depending on the application, an interval pressure transient test (IPTT) provides advantages over a conventional drillstem test (DST). It is environmentally friendly because no fluids flow to the surface, and it is cost effective because many zones can be tested in a short time.

The MRPA can be used to create a micro-hydraulic fracture that can be pressure tested to determine the minimum in situ stress magnitude. The fracture is created by pumping wellbore fluid into the interval between the inflatable packer elements.

Measurement Specifications

	MRPA
Range of measurement	CQG* crystal quartz gauge: 750 to 15,000 psi [5 to 103 MPa] Quartzdyne® gauge: 0 to 25,000 psi [0 to 172 MPa] Axton* dynamically compensated single quartz gauge: 0 to 30,000 psi [207 MPa] to 374 degF [190 degC] and 0 to 20,000 psi [138 MPa] to 392 degF [200 degC] [†] Temperature: -67 to 400 degF [-55 to 204 degC]
Resolution	CQG gauge: 0.008 psi [55 Pa] at 1.3-s gate time Quartzdyne gauge: 0.01 psi/s [69 Pa/s] Axton gauge: 0.008-psi [55-Pa] rms at 1-s gate time Temperature: 0.01 degF [0.05 degC]
Accuracy	CQG gauge: ±2 psi [13,789 Pa] + 0.01% of reading [†] Quartzdyne gauge: ±(0.02% of full scale + 0.01% of reading) Axton gauge: ±2.0 psi [±13,689 Pa] for typical HPHT operational range (>212 degF [>100 degC] and >15,000 psi [>103 MPa]) and ±6.0 psi [±41,368 Pa] for full range [†] Temperature: ±1.0 degF [±0.5 degC]

* Operating range up to 400 degF and default calibration to 392 degF with calibration to higher temperature on request.

† Includes fitting error, hysteresis, repeatability, and allowance for sensor aging; the corresponding percentages of the pressure reading account for the uncertainty of the calibration equipment.

Dual-Packer Module Packers Mechanical Specifications

Packer	Outside Diameter, in [cm]	Hole Size—Min., in	Hole Size—Max., in	Temperature Rating, degF [degC]	Pressure Rating, psi [MPa]	Differential Pressure Rating, psi [MPa]	Type	Recommended Number of Settings [†]
SIP-A3-5in	5 [12.70]	5.875	7.5	350 [177]	20,000 [138]	4,500 [31]	Symmetrical	10 settings at 3,000 psi in 6-in hole
SIP-A3A-5in	5 [12.70]	5.875	7.5	350 [177]	20,000 [138]	4,500 [31]	Asymmetrical	10 settings at 3,000 psi in 6-in hole
IPCF-H2S-500	5 [12.70]	5.875	7.5	350 [177]	20,000 [138]	TBQ [†]	Asymmetrical	TBQ [†]
SIP-A3-6.75in	7 [17.78]	7.875	9.625	350 [177]	20,000 [138]	3,000 [21]	Symmetrical	10 settings at 3,000 psi in 8.75-in hole
SIP-A3A-6.75in	7 [17.78]	7.875	9.625	350 [177]	20,000 [138]	3,000 [21]	Asymmetrical	10 settings at 3,000 psi in 8.75-in hole
IPCF-PAS-700	7 [17.78]	7.875	9.625	350 [177]	20,000 [138]	3,000 [21]	Symmetrical	10 settings at 3,000 psi in 8.5-in hole
IPCF-PA-700	7 [17.78]	7.875	9.625	350 [177]	20,000 [138]	3,000 [21]	Asymmetrical	10 settings at 3,000 psi in 8.5-in hole
IPCF-PC-700	7 [17.78]	7.875	9.625	350 [177]	20,000 [138]	4,500 [31]	Asymmetrical	5 settings at 4,500 psi in 8.5-in hole
IPCF-BA-700	7 [17.78]	7.875	9.625	410 [210]	20,000 [138]	3,000 [21]	Asymmetrical	3 settings at 3,000 psi in 8.5-in hole
IPCF-H2S-700	7 [17.78]	7.875	9.625	350 [177]	20,000 [138]	3,000 [21]	Asymmetrical	10 settings at 3,000 psi in 8.5-in hole
SIP-A3A-8.5in	8.5 [21.59]	9.875	14	350 [177]	20,000 [138]	3,000 [21]	Asymmetrical	10 settings at 3,000 psi in 12.25-in hole
SIP-A3A-10in	10 [25.40]	11	17.5	350 [177]	20,000 [138]	2,100 [14]	Asymmetrical	7 settings at 2,100 psi in 14.4-in hole

[†] At the specified pressure and hole size

[†] To be qualified

slb.com/mdt

APPENDIX D-4

SCHLUMBERGER SATURN 3D RADIAL PROBE

Schlumberger



Saturn
3D radial probe

Saturn

Fluid flow and pressure measurement where not previously possible

Applications

- Formation fluid sampling
- Downhole fluid analysis (DFA)
- Formation pressure measurement
- Fluid-gradient determination
- Far-field permeability measurement and anisotropy determination
- Well testing design optimization

Benefits

- Fluid sampling and DFA for
 - Low-permeability formations
 - Heavy oil
 - Fluids with a bubble- or dewpoint near reservoir pressure
 - Unconsolidated formations
 - Rugose boreholes
- Low-permeability formation pressure testing
- Interval pressure transient testing (IPTT) with reduced storage for fast flow-regime identification

Features

- Combinable with all MDT* modular formation dynamics tester modules
- High-temperature rated to 350 degF
- 8,000-psi differential pressure rating between flowline and hydrostatic pressure
- Low storage effect
- No sump, eliminating fluids mixing with stationary mud
- Four field-replaceable, elliptical suction probes
- 79.44-in² total surface flow area
- Individual probe filters to prevent flowline plugging
- Self-sealing drain assembly for excellent seal maintenance during sampling in any quality of borehole



The keys to fluid acquisition and pressure pretests

A revolution in sampling and pressure-testing technology

The self-sealing Saturn* 3D radial probe enables true 3D circumferential flow in the formation around the borehole, significantly reducing the time needed to obtain representative formation fluids and extend fluid sampling and downhole fluid analysis (DFA) to what were previously challenging environments:

- low-permeability formations
- heavy oil
- near-critical fluids
- unconsolidated formations
- rugose boreholes.

The low storage volume of the Saturn design not only facilitates fluid sampling and DFA but also the efficient performance of complete pressure surveys in extremely low-permeability formations.

Surface area open to flow and pressure drawdown

Successful wireline fluid sampling and DFA begin with accessing a representative sample of the virgin reservoir fluid, ideally in a minimum amount of time. Formation pressure testing similarly requires fluid withdrawal.

The fluid extraction is typically conducted with a probe module that includes a packer, telescoping backup pistons, and a flowline.

The pistons extend the probe and packer assembly against the borehole wall to provide a sealed fluid path from the reservoir to the flowline. The governing principle behind flowing any fluid from a reservoir for formation testing is Darcy's law, in which flow (q) is a function of permeability (k), drawdown pressure (Δp), surface area open to flow (A), fluid viscosity (μ), and the length (L) over which the drawdown is applied.

$$q = \frac{k A \Delta P}{\mu L}$$

Flow from the formation to a conventional formation tester is narrowed to the intake of the single probe, not from the entire circumference of the borehole wall.

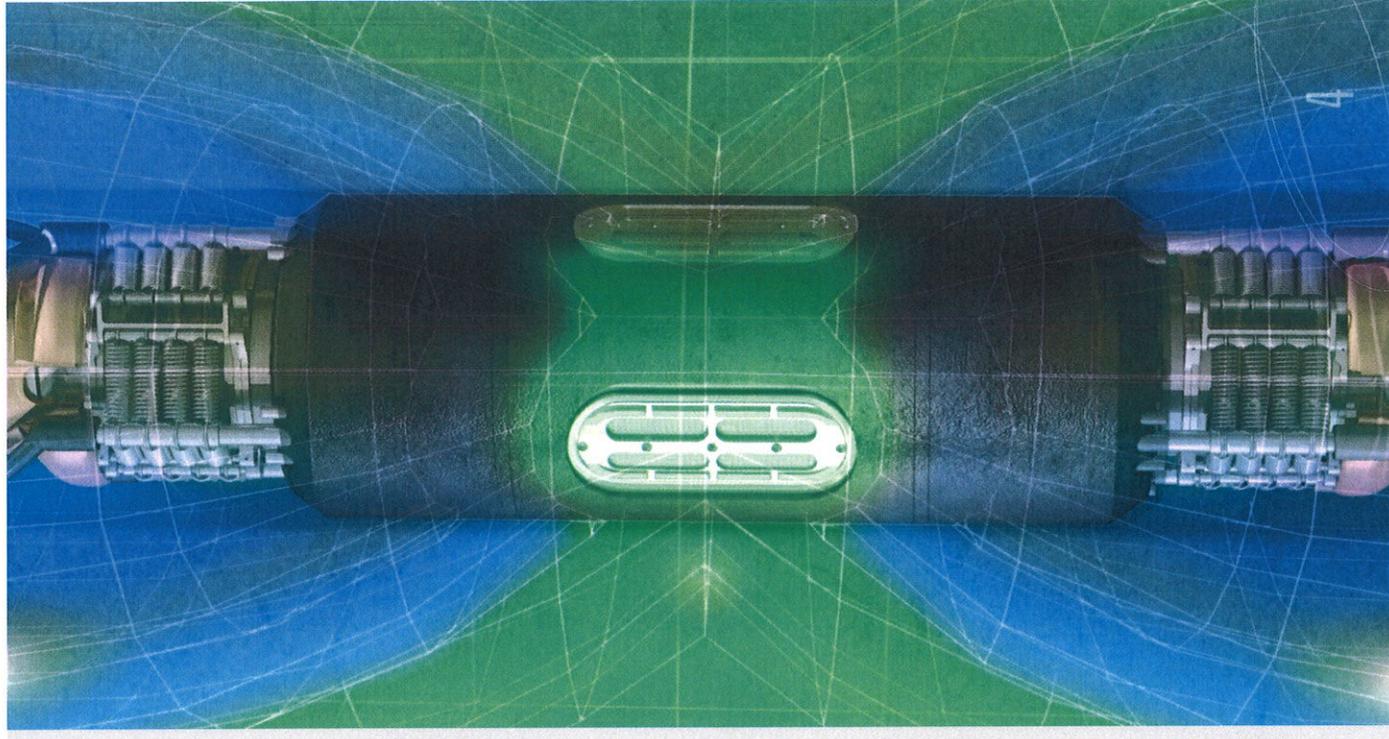
Different probe surface flow areas and the maximum pressure drawdowns that the formation tester can manage are used depending on the formation permeability and fluid viscosity. Typically, the larger the surface area and the higher the maximum drawdown pressure, the higher the flow rate of fluid from the formation that can be achieved for a formation testing operation.

Over the years, Schlumberger innovation has increased the maximum allowable differential pressure from 4,596 psi with the standard pumpout displacement unit to 11,760 psi with the high-pressure displacement unit. Concurrently, the available surface area of the probes has increased by nearly 40 times, from the standard probe's 0.15 in² to the 6.03-in² elliptical probe. This technical progression enables successfully performing

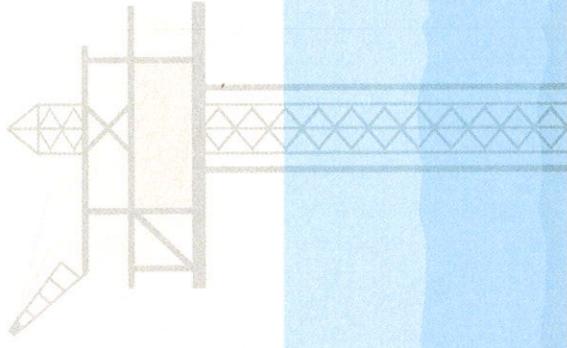
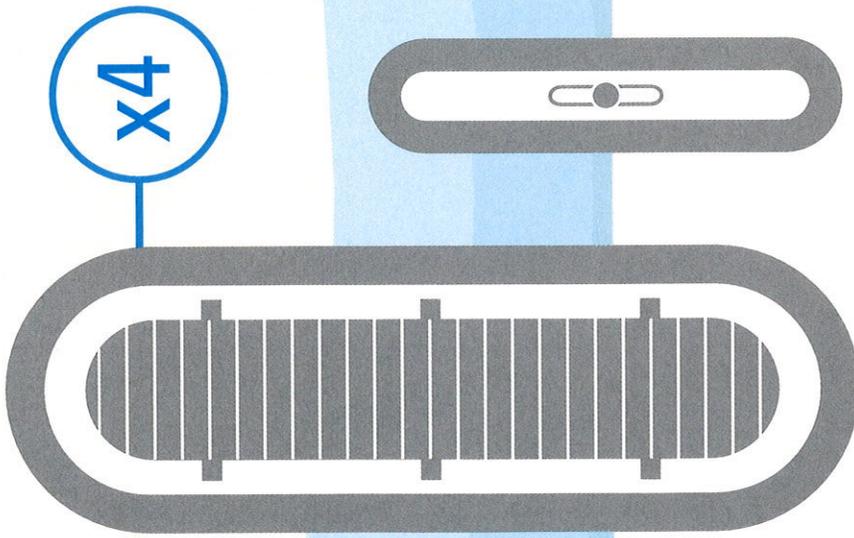
formation testing in a wider range of environments. However, as operators attempt to tap into hydrocarbons previously thought to be unproducible—low-permeability or unconsolidated reservoirs, high-viscosity formation fluids—or where reduced drawdown is necessary to test reservoirs in which the saturation pressure of the fluid is close to the reservoir pressure, formation testing is technologically challenged.

The **Saturn 3D radial probe** meets these challenges with a radical redesign of the fluid-extraction module to deploy multiple self-sealing probes around the borehole. With a total surface flow area of 79.44 in², Saturn technology expands the operating envelope of formation testing for both fluid flow and reservoir environments.

The self-sealing drain assembly incorporating the four Saturn probes circumferentially extracts fluid from the formation instead of localizing flow at a single probe.



The Saturn 3D radial probe increases the probe surface area by more than 500 times.



Probes not to scale.

79.44

Surface flow area, in²

Saturn 3D radial probe

6.03

Surface flow area, in²

Elliptical probe

2.01

Surface flow area, in²

Extralarge-diameter probe

1.01

Surface flow area, in²

Quicksilver Probe* probe

0.85

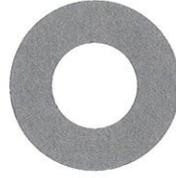
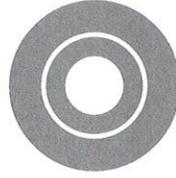
Surface flow area, in²

Large-diameter probe

0.15

Surface flow area, in²

Standard probe



Flow certainty for understanding your heavy oil and low-permeability reservoir

The 79.44 in² of surface flow area of the Saturn 3D radial probe makes it easy to extract heavy oils for conducting DFA, sampling, and pressure testing. Having brought uncontaminated oil with a relative density as low as 7.5 API to the surface, the Saturn probe significantly expands the operating envelope of sampling and determining mobility for viscous fluids.

Reliably out of the hole, every time

Sixty-four individual heavy-duty springs mounted around the edges of the Saturn assembly and two large-diameter heavy-duty springs around the mandrel ensure reliable, consistent retraction of the elliptical suction probes after every station. The large cumulative closing force of the mechanical spring system keeps operational risk to a bare minimum.



The mechanical retract mechanism of the Saturn 3D radial probe employs heavy-duty springs to secure the probes when not deployed.

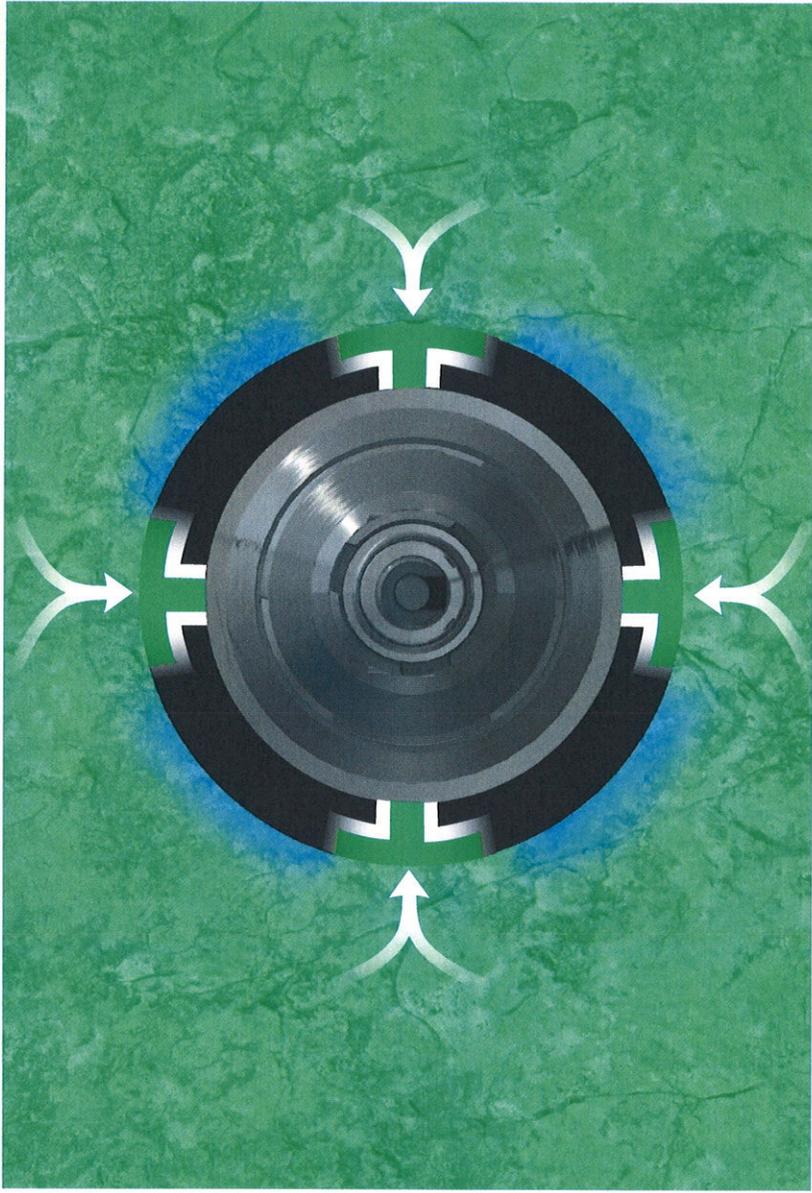
Flow fluid in three dimensions

The Saturn 3D radial probe comprises four elliptical-shaped suction probes, distributed at 90° intervals around the circumference of the tool. This placement pulls fluid circumferentially from around the borehole, instead of the conventional probe arrangement of one port as the sole fluid access point. Each of the four Saturn probes has a surface flow area of 19.86 in², which is more than 2 times larger than the surface area of the largest conventional probe. Together, the four Saturn probes total 79.44 in² of surface flow area, an increase of more than 500 times over the area of the standard conventional probe.



Flow from the formation to a conventional formation tester is narrowed to the intake of the single probe, not from the entire circumference of the borehole wall.

Circumferential flow around the wellbore has significant benefits for both sampling cleanup and interval pressure transient testing (IPTT). The Saturn 3D radial probe quickly removes the filtrate from the entire circumference of the wellbore to draw in uncontaminated formation fluid. In addition, the significantly larger flow area of the 3D radial probe can induce and sustain flow in low-mobility formations, formations in which the matrix is uncemented, and the viscous fluid content of heavy oil reservoirs.



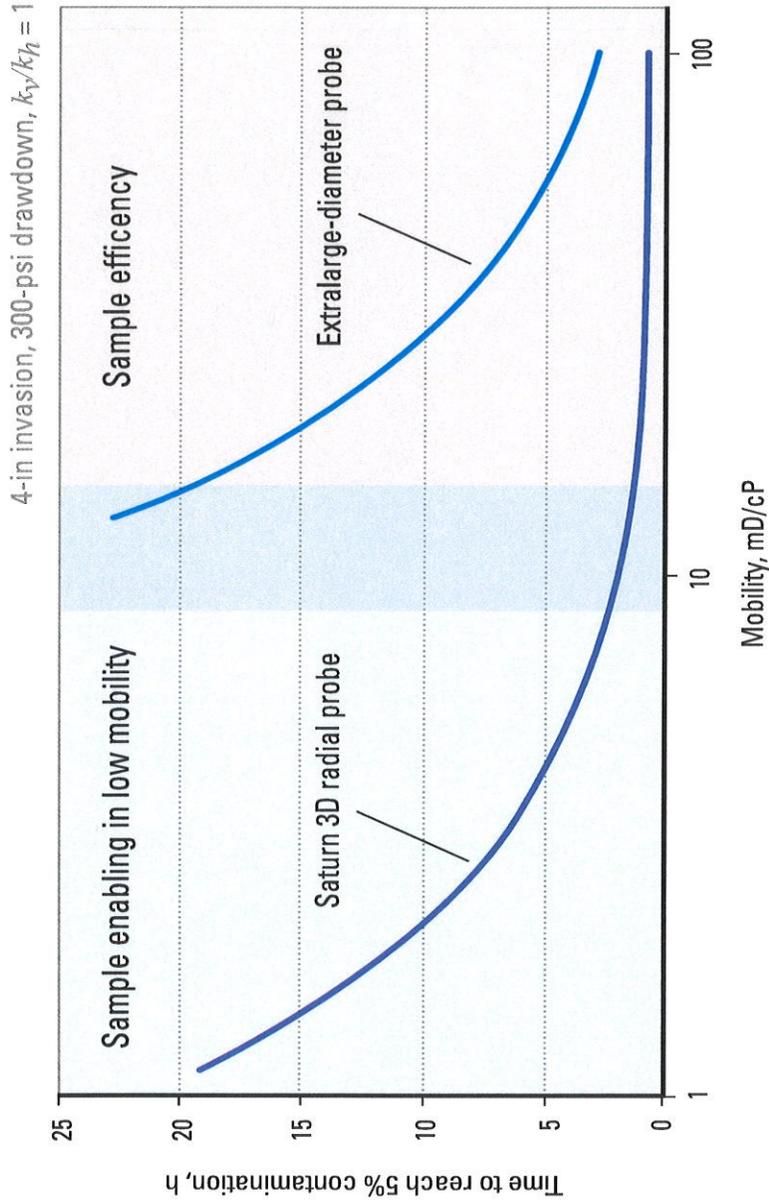
The four Saturn probes efficiently establish circumferential flow from the formation to quickly remove filtrate-contaminated fluid and flow uncontaminated, representative fluid for DFA, sampling, and pressure measurements.

Sealing with confidence

Unlike the packer incorporated in a conventional probe assembly or operations using a dual straddle packer in the testing string, the Saturn probes self-seal with suction to the borehole wall to receive direct flow from the formation with faster cleanup.

Direct rig-time savings in low-permeability formations

As the permeability of a formation decreases, the performance improvement of the Saturn 3D radial probe over conventional probes widens significantly. As shown in comparison with the extralarge-diameter probe for achieving 5% contamination, the Saturn 3D radial probe improves sampling efficiency beginning at formation mobilities of 500 mD/cP, with the performance gap greatly expanding as the mobility decreases. Once mobility approaches 10 mD/cP, the extralarge-diameter probe cannot move the formation fluid, whereas the Saturn 3D radial probe is an enabling technology.



Modeled cleanup times for the Saturn 3D radial probe and a conventional extralarge-diameter probe show the increase in sampling efficiency possible. The Saturn 3D radial probe is an enabling technology for sampling at mobilities less than 10 mD/cP, at which the conventional probe cannot perform.

Complete pressure surveys in low-mobility formations

The technology that makes the Saturn 3D radial probe excel at fluid extraction also delivers a step change in formation pressure testing. Conventional formation tester probes with the largest surface flow area currently available are limited to pressure testing formations with mobilities no lower than about 1 mD/cP. Pretesting-only service is the current benchmark for excellent performance in low-permeability formations, but the mobility limit for pressure tests is about 0.1 mD/cP.

The Saturn 3D radial probe, with 79.44 in² of surface flow area, can perform pressure tests at mobilities as low as 0.01 mD/cP. In addition to its unprecedented pressure-testing capability in very tight formations, the Saturn 3D radial probe has proved far less susceptible to supercharging. Conducted with the MDT Pumpout Module, Saturn pressure tests produce significantly more fluid than during a conventional probe test.

Circumferential support for unconsolidated formations

The circumferential self-sealing technology of the Saturn 3D radial probe mechanically supports the borehole with the compliant rubber seal of its drain assembly throughout the sampling operation. Pressure drawdown is localized to the four elliptical suction probes, which minimizes the matrix stress while flowing fluid. If any matrix disengages while flowing fluid, the Saturn 3D radial probe is equipped with sandface filtering mechanisms on each of the probes to prevent plugging of the system.

Case Studies



Saturn probe retrieves uncontaminated 7.5-API oil from friable sandstone

Accurate fluid description and determination of pressure differentials were needed to guide well placement and completion in an onshore Mexico field to avoid the development of preferential flow along higher-mobility intervals. However, the combination of a poorly consolidated formation, with unconfined compressive strength (UCS) values ranging from 100 to 800 psi, and high-viscosity fluid content meant that the pressure differential generated by conventional formation testing inevitably caused collapse of the wellbore wall and failure of the seal or sanding out of the tool.

The operator had to resort to temporarily perforating, completing, and flowing each sand separately to collect samples in coiled tubing-deployed bottles on a DST string. The complicated logistics and high costs of this approach were not sustainable.

Unlike single-probe conventional formation testers, the Saturn 3D radial probe is ideal for flowing fluid in these challenging conditions of an unconsolidated reservoir with low mobility. The four self-sealing elliptical probes, with the industry's largest surface flow area of more than 79 in², quickly establish and maintain flow from the entire circumference of the wellbore instead of funneling fluid from the reservoir to a single access point. The result is quicker cleanup and the efficient performance of pressure measurements.

In unconsolidated formations, the compliant rubber surface of the Saturn drain assembly mechanically supports the borehole throughout the sampling operation. Pressure drawdown is localized to the four elliptical probes, which minimizes matrix stress while fluid is flowing.

If sand grains were drawn in with the flowing fluid, the Saturn drain assembly incorporates individual probe filters to prevent flowline plugging.

The Saturn 3D radial probe was deployed in the field to test and sample at multiple stations in several wells, which have up to 12% ovalization. Whereas conventional probes commonly experienced lost seals in the rugose holes, the Saturn self-sealing probes maintained seal integrity to support the borehole in the unconsolidated sandstone reservoirs. There was no evidence of sand grains reaching the pumps.

Full pressure surveys were conducted in both water- and oil-base mud environments with only minor storage effects observed in the pressure responses. The pressure surveys in combination with the mobilities determined from every pretest are being used to design completions that will evenly distribute injected steam among designated intervals and avoid channeling.

Fluid sampling successfully captured an uncontaminated sample of 7.5-API oil; subsequent laboratory analysis reported a viscosity of approximately 1,030 cP at downhole conditions. Being able to use the Saturn 3D radial probe to collect what were previously unobtainable high-quality samples and pressure data is providing a wealth of information for the operator.



The Saturn 3D radial probe collected an uncontaminated sample of 7.5-API oil from an unconsolidated sandstone reservoir without sanding or seal failure.



Each self-sealing Saturn probe incorporates a filter to capture any dislodged matrix and prevent plugging.

Case Study



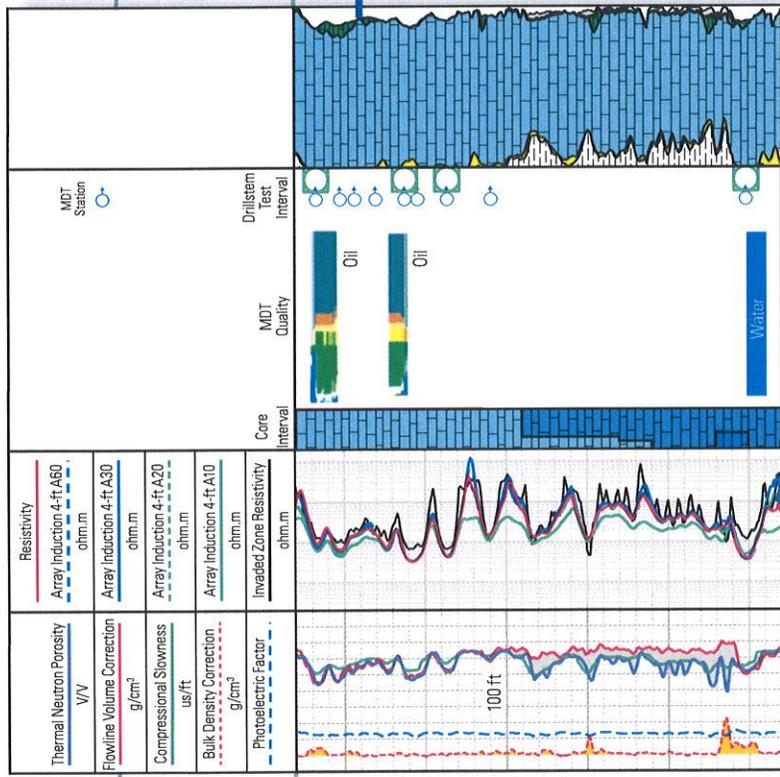
Saturn probe delineates low-mobility oil zone in carbonate reservoir

The extent of the oil zone in a tight carbonate reservoir in a Middle East field was not clear. Openhole logs strongly indicated that the top of the formation was oil bearing and the bottom was water-wet, but the fluid contents of the middle zone were ambiguous. The middle zone had a lower resistivity response that was similar to that in the underlying water zone. The location of the oil/water contact could not be determined from the logs alone, and conventional formation tester probes would not be able to acquire fluid samples from the tight formation.

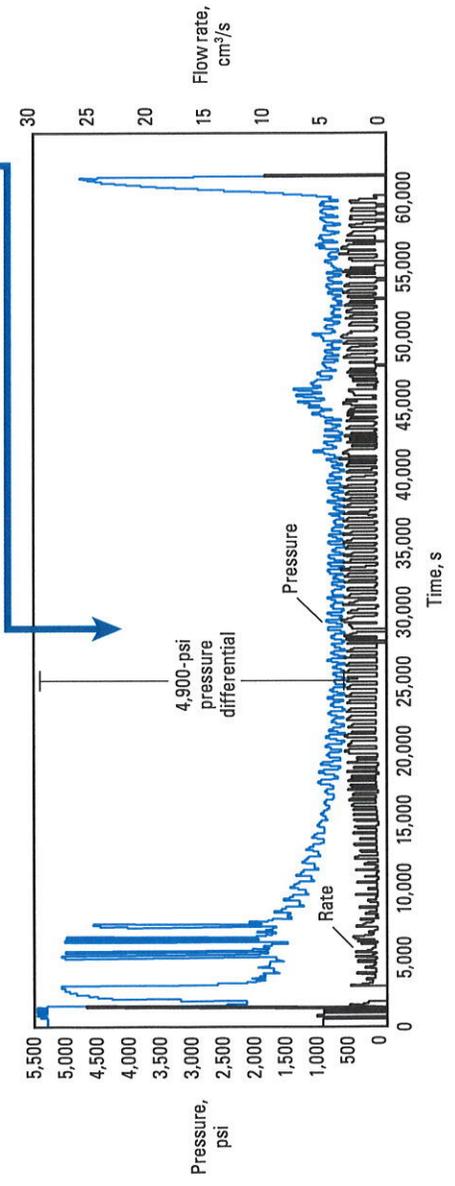
By establishing true 3D circumferential flow around the borehole in the low-permeability formation, the Saturn 3D radial probe successfully collected samples from the top, middle, and bottom of the carbonate reservoir.

Extensive pumpout by the Saturn probe confirmed light oil in the top zone through DFA. A radial flow regime was established with an estimated horizontal permeability of approximately 1 mD. The station in the bottom zone yielded water and had a similar permeability.

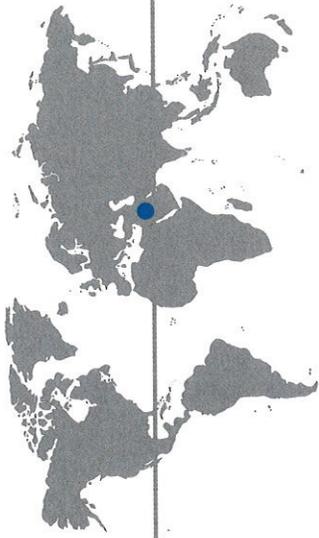
DFA then identified mobile light oil in the middle of the reservoir, and the operator was able to determine the thickness of the oil zone with confidence. Pumpout for the middle station was achieved with a 4,900-psi pressure differential for 15 h, resulting in a mobility determination of 0.04 mD/cP.



Mobile oil was acquired by the Saturn 3D radial probe at the top and middle stations to favorably place the oil/water contact compared with the ambiguous low-resistivity logs. The bottom pressure plot shows the pressure differential applied over an extensive pumpout at the middle station to retrieve representative oil from the carbonate reservoir, with a mobility of 0.04 mD/cP.



Case Study

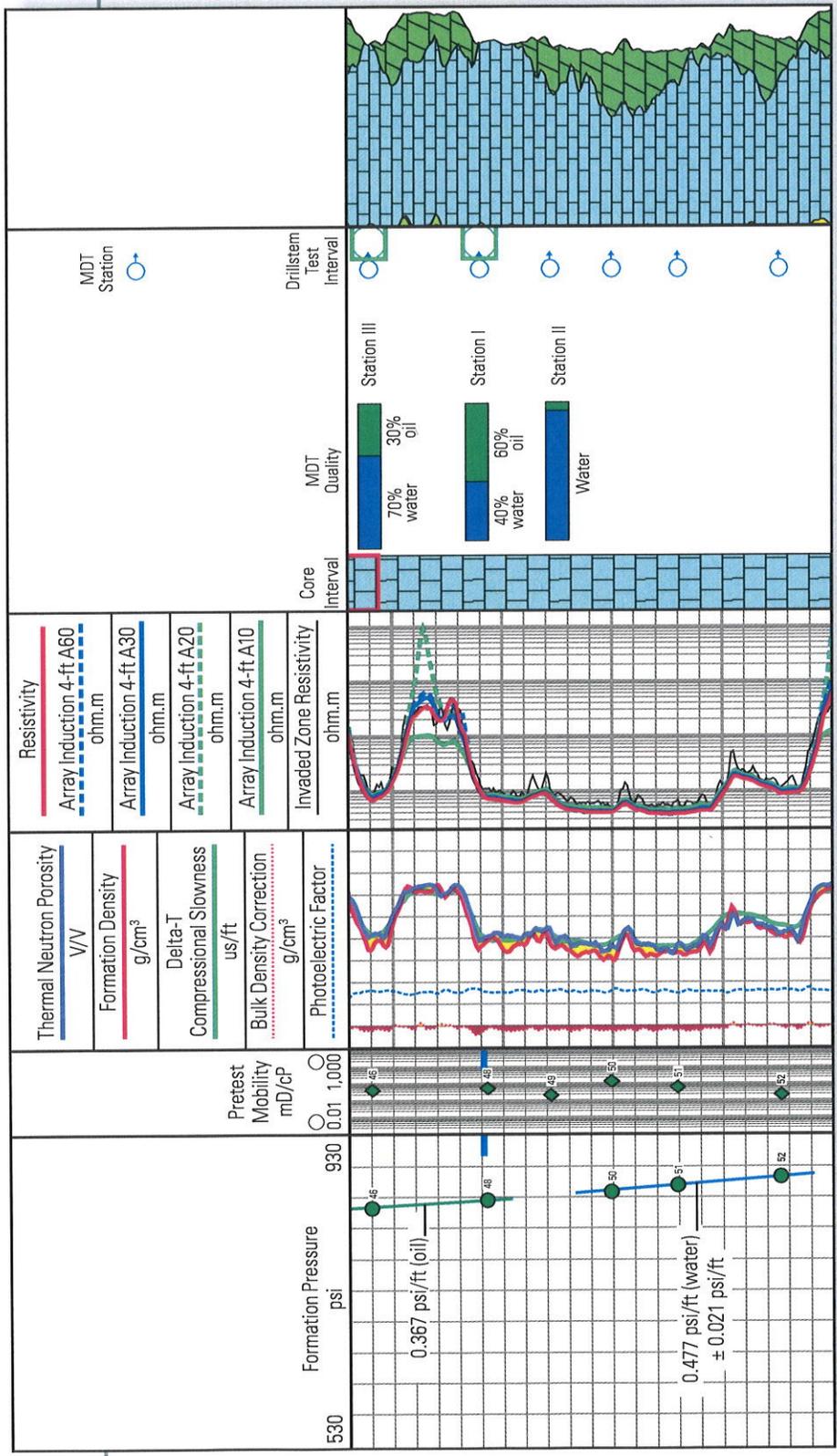


650% faster flow rate efficiently acquires fluids from dolomite

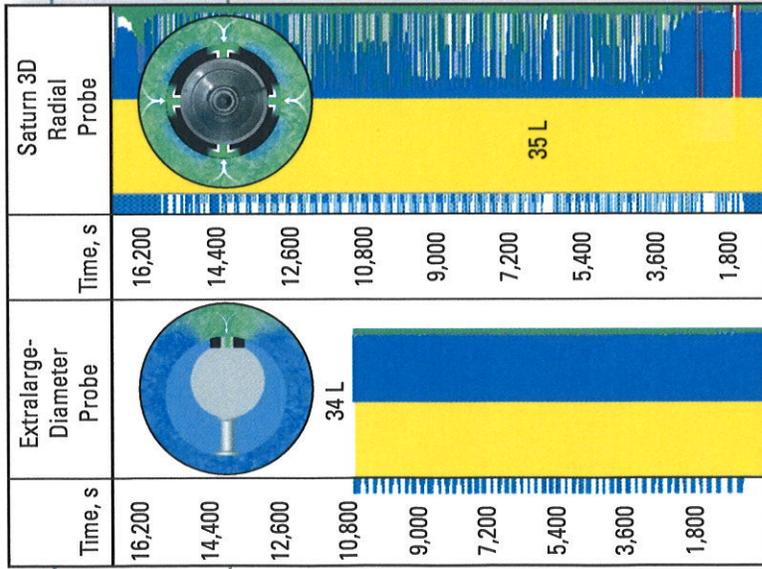
The openhole logs from a dolomitic limestone interval drilled with saline water-base mud in the Middle East did not indicate the presence of hydrocarbon, but the analysis was ambiguous because some zones had resistivity values as low as 0.7 ohm.m. The operator wanted to conduct DFA and collect samples to resolve the identity of the reservoir fluids, but the time allowed at each sampling station was limited to 4 h in consideration of mud losses during the job.

Schlumberger deployed an advanced wireline formation tester toolstring that included both the Saturn 3D radial probe and an extralarge-diameter conventional probe to acquire fluid at multiple stations in a single trip.

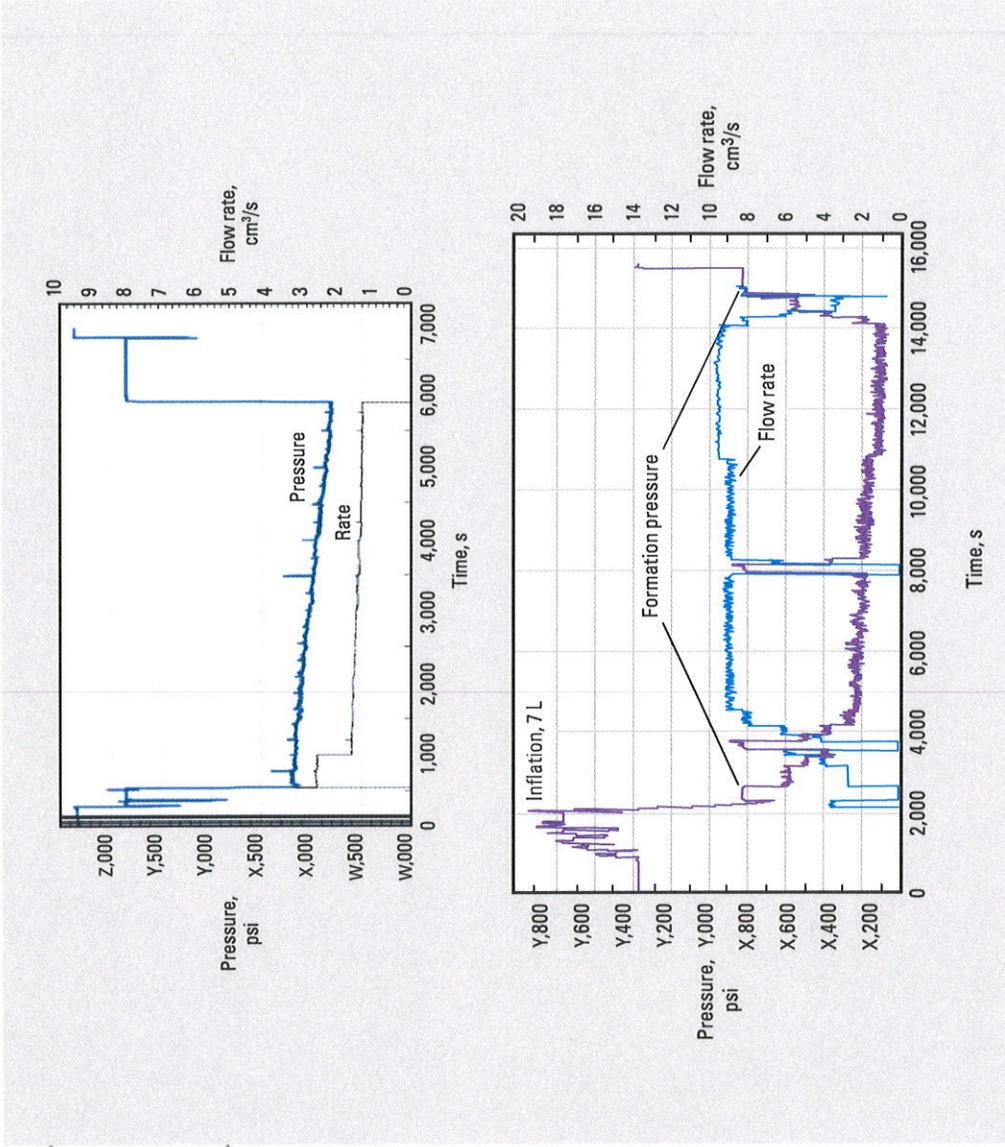
After DFA at Station I clearly identified 60%–70% oil, Station II was selected for determining the lowest mobile oil. The initial sampling attempt with the extralarge-diameter probe experienced a significant pressure drop, with 2,000-psi drawdown and a low flow rate of 5.2 L/h. The resulting pretest mobility was 1.5 mD/cP. After 1.5 h of pumping out, flow was switched to the Saturn 3D radial probe, and the rate increased 650% with only 680-psi drawdown. The performance of the Saturn 3D radial probe for the ratio of rate to pressure drop was a 19-times improvement over that of the extralarge-diameter probe for the 1.5-mD/cP mobility. Flowline resistivity stabilization was achieved with water identification at Station II within the 4-h limit for the well, and the water collected in the sample bottle confirmed the DFA results.



The extralarge-diameter probe was able to collect reservoir fluid at Station I, but after 1.5 h of pumping out at Station II, flow was switched to the Saturn 3D radial probe, which increased the flow rate by 650%.



No oil was observed by the optical analyzers for the 34 L of fluid extracted at Station II by the extralarge-diameter probe (left) at a large drawdown and low rate. Once flow was switched to the Saturn 3D radial probe (right), cleanup was achieved at a rate that was about 3.5 times faster. The insets show how the fluid flow in the reservoir is to a single point for the conventional probe but circumferentially for the four self-sealing Saturn probes.



Comparison of pressure and rate of the extralarge-diameter probe (left) and Saturn 3D radial probe (right) at Station II shows that the Saturn probe increased the flow rate 650% with only 680-psi drawdown, which is one-third of the conventional single probe's drawdown. The resulting ratio of rate to pressure drop delivered an improvement of 19 times over the single probe's performance.



Specifications	
Saturn 3D Radial Probe	
Measurement	Ultralow-contamination formation fluids, formation pressure, fluid mobility
Output	Stationary
Logging speed	None
Mud type or weight limitations	Fully integrates with MDT modular formation dynamics tester system and InSitu Family* sensors
Combinability	Low-permeability formations, heavy oil, near-critical fluids, unconsolidated formations, and rugose boreholes
Special applications	
Mechanical	
Temperature rating	350 degF [177 degC]
Pressure rating	20,000 psi [1.38 MPa]
Borehole size—min.	7.875 in [20.00 cm]
Borehole size—max.	9.5 in [24.13 cm]
Max. hole ovality	20%
Outside diameter	Tool body: 4.75 in [12.06 cm] Drain assembly: 7 in [17.78 cm]
Length	5.7 ft [1.74 m] With Modular Reservoir Sonde and Electronics (MRSE): 12.4 ft [3.78 m]
Weight (in air)	385 lbm [175 kg] With MRSE: 585 lbm [265 kg]

Saturn



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APPENDIX E

**RISK ASSESSMENT EMERGENCY REMEDIAL
AND RESPONSE**

Stage	Risk	Description	Severity	Likelihood	Monitoring	Control in Place	Potential Response Actions	Response Personnel
Construction Period	Well control event while drilling or completing the well with loss of containment.	This event could occur during drilling and completion operations if the hydrostatic column controlling the well decreases below the formation pressure, allowing fluids to enter the well suddenly.	Serious	Unlikely	<ul style="list-style-type: none"> * Flow sensor. * Pressure sensor. * Tank level indicator. * Tripping displacement practices. * Mud weight control. 	<ul style="list-style-type: none"> * Blowout prevention (BOP) equipment. * Kill fluid. * Well control training. * BOP testing protocol. * Kick drill. * Lubricators for wireline operations. 	<p>Drilling:</p> <ul style="list-style-type: none"> * Stop operation. * Close BOP. * Clear floor and secure area. * Execute well control procedure. * Evaluate drilling parameters to identify root cause. * Continue operations. <p>Completion:</p> <ul style="list-style-type: none"> * Stop operations. * Close BOP. * Clear floor and secure area. * Execute well control procedure. * Continue operations. 	<ul style="list-style-type: none"> * Rig crew * Rig manager * Field superintendent * Project manager
Construction Period	Movement of brine between formations during drilling.	This event could occur if, while drilling the injection target, there is cross flow, with losses into the USDW.	Minor	Unlikely	<ul style="list-style-type: none"> * Tank level sensor. * Mud lab test. * Pressure sensors. * Flow sensors. * Tripping sheets. 	<ul style="list-style-type: none"> * USDW will be covered with the surface casing and set in Pierre Formation. * Casing test after cementing surface casing to check integrity. * FIT test to verify shoe integrity. * Mud used in surface casing are based on fresh water and clays. * CBL to check cement bonding. 	<ul style="list-style-type: none"> * Stop drilling. * Check well level to detect a lost circulation or influx. * In case of losses, treat the well with lost circulation material, and evaluate mud weight and drilling parameters. * In case of influx, control the well, without compromising the shoe integrity. * In case shoe is identified as leaking, squeeze to regain integrity. * In case surface casing shows a leak, squeeze or install a casing patch. 	<ul style="list-style-type: none"> * Rig crew * Rig manager * Field superintendent
Injection Period	Loss of mechanical integrity injection wells – tubing/packer leak	This event could occur because of corrosion, damage in the tubulars during installation, fatigue, higher load profiles, and others and could cause communication of formation fluids with the annular casing tubing as well as sustained casing pressure. There is no LOC in this scenario.	Serious	Likely	<ul style="list-style-type: none"> * Pressure and temperature gauges on surface and downhole real time. * Electromagnetic casing inspection log. * Annular pressure test * CO₂ leak sensors on the wellhead 	<ul style="list-style-type: none"> * Coated tubing. * Inhibited packer fluid in annular. * Corrosion monitoring plan. * Dry CO₂ injected. * Nickel-plated packers. * FF trim tubing hanger and tree. * CR tubing tailpipes below packers. * CR or Inconel carrier for the sensors. * New tubing. 	<ul style="list-style-type: none"> * Trigger alarm by the system, monitoring personnel, or operations engineer. * Follow protocol to stop operation, vent, or deviate CO₂. * Troubleshoot the well. * If tubing leak is detected, discuss with regulator the action plan based on the finding. * Schedule well service to repair tubing. 	<ul style="list-style-type: none"> * Operation engineer * Field superintendent * Project manager
Injection Period Postinjection	Loss of mechanical integrity monitoring wells – tubing/packer leak.	This event could occur because of corrosion, damage in the tubulars during installation, fatigue, higher load profiles, and others and could cause a communication of the formation fluids with the annular casing tubing as well as sustained casing pressure. There is no LOC in this scenario. Monitoring wells are designed to be outside of the projected plume for the majority of the project which reduces the risk of contact with CO ₂ .	Minor	Unlikely	<ul style="list-style-type: none"> * Pressure and temperature gauges on surface and downhole real time. * Electromagnetic casing inspection log. * Annular pressure test. * CO₂ leak sensors on the wellhead. 	<ul style="list-style-type: none"> * Coated tubing. * Inhibited packer fluid in annular. * Corrosion monitoring plan. * Nickel-plated packers * CR tubing below/between packers. * CR or Inconel carrier for the sensors. * New tubing. 	<ul style="list-style-type: none"> * Trigger alarm by the system, monitoring personnel, or operations engineer. * Troubleshoot the well. * If tubing leak is detected, discuss with regulator the action plan for well service. * Schedule well service to repair tubing or abandon the well. 	<ul style="list-style-type: none"> * Operation engineer * Field superintendent * Project manager * Rig crew and DH contractors

Injection Period	Loss of mechanical integrity injection wells – casing leak.	This event could occur because of corrosion, damage in the tubulars during installation, fatigue, higher load profiles, or others. This event could cause a migration of CO ₂ and brines through the casing, the cement sheet, and into different formations of the injection target or into USDW.	Serious	Unlikely	<ul style="list-style-type: none"> * Pressure and temperature gauges on surface and downhole real time. * Electromagnetic casing inspection log. * CO₂ leak sensors on the wellhead. * DTS fiber real time alongside the casing. * Flow rate monitoring. * Soil gas probes. * Neutron activated logs. * USDW water monitoring. 	<ul style="list-style-type: none"> * CO₂-resistant cement and metallurgic across injection zone. * Injection through tubing and packer. * Nickel-plated packers. * CR or Inconel carrier sensors. * Inhibited packer fluid in the annular. * Cement to surface. * Corrosion monitoring plan. * CBL/USIT after installation. * New casing and tubing installed. 	<ul style="list-style-type: none"> * Trigger alarm by the system, monitoring personnel, or operations engineer. * Follow protocol to stop operation, vent, or deviate CO₂. * Troubleshoot the well. * Evaluate if there is a movement of CO₂ or brines to USDW. In the remote event that USDW gets affected, discuss remediation options with the regulatory agency. * If casing leak is detected, discuss with regulator the action plan based on the finding and location of the leak. * Schedule well service to repair the casing. 	<ul style="list-style-type: none"> * Operation engineer * Field superintendent * Project manager * Rig crew and DH contractors * Remediation contractors
Injection Period Postinjection	Loss of mechanical integrity monitoring wells – casing leak.	This event could occur because of corrosion, damage in the tubulars during installation, fatigue, higher load profiles, and others. This event could cause a migration of CO ₂ and brines through the casing, the cement sheet, and into different formations of the injection target or into USDW. Monitoring wells are designed to be outside of the projected plume for the majority of the project which minimizes the risk of contact with CO ₂ .	Serious	Unlikely	<ul style="list-style-type: none"> * Pressure and temperature gauges on surface and downhole real time. * Electromagnetic casing inspection log. * CO₂ leak sensors on the wellhead. * Soil gas probes. * Neutron activated logs. * USDW water monitoring. 	<ul style="list-style-type: none"> * CO₂-resistant cement across injection zone. * Nickel-plated packers. * CR or Inconel carrier sensors. * Inhibited packer fluid in the annular. * Cement to surface. * Corrosion monitoring plan. * CBL/USIT after installation. * New casing and tubing installed. 	<ul style="list-style-type: none"> * Trigger alarm by the system, monitoring personnel, or operations engineer. * Troubleshoot the well. * Evaluate if there is a movement of CO₂ or brines to USDW. In the remote event that USDW gets affected, discuss remediation options with the regulatory agency. * If casing leak is detected, discuss with regulator the action plan based on the findings and the location of the leak. * Schedule well service to repair the casing. 	<ul style="list-style-type: none"> * Operation engineer * Field superintendent * Project manager * Rig crew and DH contractors * Remediation contractors
Injection Period	LOC: vertical migration via injection wells.	<p>During the life of the injector wells, there are induced stresses and chemical reactions on the tubulars and cement exposed to the CO₂ pressure and plume.</p> <p>Changes in temperature and injection pressure create stresses in the tubulars trying to expand or contract, and it can lead to microannulus effects.</p> <p>The combination of the dry CO₂ injected and the formation brines creates carbonic acid that reacts with the components of the cement to degrade properties such as permeability, strength, porosity, etc., weakening the matrix.</p> <p>These mechanics could lead to cracks, channels, or simply permeable paths inside the cement that could connect the injection zone with those above the storage complex, causing migration of brines/CO₂.</p>	Serious	Unlikely	<ul style="list-style-type: none"> * CO₂ leak sensors on the wellhead. * DTS fiber real time alongside the casing. * Soil gas probes. * USDW water monitoring. * Neutron activated logs to be run for external MI. * Pressure gauges at surface. * Flow rate monitoring. 	<ul style="list-style-type: none"> * CO₂-resistant cement and metallurgic across injection zone. * Injection through tubing and packer. * Cement to surface. * CBL/USIT after installation. * USDW covered as second barrier with surface casing and surface cement sheet. * New casing installed. 	<ul style="list-style-type: none"> * Trigger alarm by the system, monitoring personnel, or operations engineer. * Follow protocol to stop operation, vent, or deviate CO₂. * Troubleshoot the well. * Evaluate if there is a movement of CO₂ or brines to USDW. In the remote event that USDW gets affected, discuss with regulatory agency remediation options, action plan, and monitoring program. * Discuss with regulator the action plan to repair the well or P&A based on the findings of the assessment. 	<ul style="list-style-type: none"> * Operation engineer * Field superintendent * Project manager * Rig crew and DH contractors * Remediation contractors

Injection Period Postinjection	LOC: vertical migration via monitoring wells.	During the life of the monitoring wells, there are induced stresses and chemical reactions on the tubulars and cement-exposed brines, pressure plume and, eventually, CO ₂ . These mechanics could lead to cracks, cement deterioration, channels, or simply permeable paths inside the cement that could connect the injection zone with those above the storage complex, causing migration of brines/CO ₂ . Monitoring wells are designed to be outside of the plume for the majority of the injection period.	Serious	Unlikely	* CO ₂ leak sensors on the wellhead. * Soil gas probes. * USDW water monitoring. * Neutron activated logs to be run for external MI. * Pressure gauges at surface.	* CO ₂ -resistant cement across injection zone. * Cement to surface. * CBL/USIT after installation. * USDW covered as second barrier with surface casing and surface cement sheet. * New casing installed.	* Trigger alarm by the system, monitoring personnel, or operations engineer. * Troubleshoot the well. * Evaluate if there is a movement of CO ₂ or brines to USDW. In the remote event that USDW gets affected, discuss with regulatory agency remediation options, action plan, and monitoring program. * Discuss with regulator action plan to repair the well or P&A based on the findings of the assessment.	* Operation engineer * Field superintendent * Project manager * Rig crew and DH contractors * Remediation contractors
Injection Period Postinjection	LOC: vertical migration via water disposal well in Inyan Kara.	This scenario could occur if there is a LOC in the CO ₂ injector well through poor cement or cracks that could allow movement of carbonic acid into the Inyan Kara Formation. Inyan Kara is the main target for water disposal in the area. If carbonic acid gets in contact with the cement and casing for the water disposal well, corrosion and cement degradation could happen, with a potential path to USDW.	Serious	Unlikely	* CO ₂ leak sensors on the wellhead. * Soil gas probes. * USDW water monitoring. * Neutron activated logs to be run for external MI or tracers. * Pressure gauges at surface.	* Evaluate CO ₂ -resistant cement through Inyan Kara in the water disposal well. * Validate Class I well will cover USDW to Pierre as well. * Recommended to include water disposal well in corrosion monitoring plan.	* Trigger alarm by the system, monitoring personnel, or operations engineer. * Follow protocol to stop injection. * Troubleshoot the well. * Evaluate if there is a movement of CO ₂ or brines to USDW and the source of the leak. * If the injector is the source of the leak, follow protocol for LOC in injectors. * In the remote event that USDW gets affected, discuss with regulatory agency remediation options, action plan, and monitoring program. * Discuss with regulator action plan to repair the well or P&A based on the findings of the assessment.	* Operation engineer * Field superintendent * Project manager * Rig crew and DH contractors * Remediation contractors
Injection Period Postinjection	LOC: vertical migration via legacy wells and P&A wells.	Brines and CO ₂ could migrate through poor cement bonding, cement degradation, or cracking in the cement in P&A wells.	Serious	Unlikely	* Soil gas probes. * CO ₂ leak sensors. * 4D seismic survey (AOR review periods).	* Legacy wells are properly abandoned for brine movement because of pressurization of injection zone. * Injectors will be abandoned as soon as CO ₂ injection in the HUB ends, except if they are left as monitoring wells.	* Trigger alarm by the system, monitoring personnel, or operations engineer. * Evaluate if it's a positive CO ₂ release because of a leak in the legacy/P&A well. * Discuss plan with regulator to repair the well, delineate the area, and identify potential resources affected. * Discuss specific remediation actions and monitoring plans. * Execute program, monitor, and evaluate efficacy.	* Operation engineer * Field superintendent * Project manager * Rig crew and DH contractors * Remediation contractors
Injection Period	LOC: vertical migration due to failure of confining rock, faults, or fractures.	This event can occur if, during injection, the pressurization of the injection zone exceeds the sealing capacity of the cap rock/seal above or if there are features such as fault or fractures that are reactivated. CO ₂ and brine could find a leak path to a shallower formation, including USDW.	Serious	Unlikely	* USDW water sampling. * 4D seismic survey. * Neutron activated log in injector and monitoring wells. * Gas soil monitoring.	* Seismic survey in the area shows no faults crossing the storage formation or the seal. * Injection is limited to 90% of frac gradient. * Extensive characterization of the rocks show good sealing capacity. * In case cap rock above Broom Creek fails, Inyan Kara underpressure zone will act as a buffer formation before CO ₂ or brines reaching USDW.	* Trigger alarm by the system, monitoring personnel, or operations engineer. * Follow protocol to stop injection. * Assess root cause by reviewing monitoring data. * If required, conduct geophysical survey to delineate potential leak path. * Evaluate if there is a movement of CO ₂ or brines to USDW. In the event that USDW gets affected, discuss with regulatory agency remediation options, action plan, and monitoring program. * Actions to restore injection will depend on the nature of the leak path and the extent. Operator needs to reevaluate model and discuss action plan with regulator.	* Monitoring staff * Geologist * Reservoir engineer * Project manager * Remediation contractors

Injection Period Postinjection	LOC: lateral migration of CO ₂ outside defined AoR.	This event could occur if the CO ₂ plume moves faster or in an unexpected pattern and expands beyond the secured pore space for the project and the AoR.	Serious	Unlikely	<ul style="list-style-type: none"> * 4D seismic. * Neutron activated logs in monitoring wells. * Pressure and temperature gauges real time in monitoring wells. 	<ul style="list-style-type: none"> * Detailed geologic model with stratigraphic wells as calibration. * Seismic survey integrated in the model. * Extensive characterization of the rocks and formation. * AoR review and calibration at least every 5 years. * Monitor the plume until stabilization (min 10 years). 	<p>Injection period:</p> <ul style="list-style-type: none"> * Trigger alarm by monitoring staff. * Review monitoring data and trends, and compare with the simulation. * Discuss with regulatory agency the findings, and request to keep injection process while AoR is reviewed, if the data show that CO₂ will stay in the secured pore space. * Perform logging in monitoring wells. * Conduct geophysical survey as required to evaluate AoR. * Recalibrate model, and simulate new AoR. * Assess if additional corrective actions are needed and if it's required to secure additional pore space. * Assess if any remediation is needed, and discuss action plan with regulatory agency. * Present AoR review to regulatory agency for approval and adjust monitoring plan. <p>Postinjection period:</p> <ul style="list-style-type: none"> * Trigger alarm by monitoring staff. * Review monitoring data and trends, compare with the simulation. * Discuss findings with regulatory agency. * Conduct geophysical survey as required to evaluate AoR. * Recalibrate model, and simulate new AoR. * Assess if additional corrective actions are needed and if it's required to secure additional pore space. * Assess if any remediation is needed, and discuss action plan with regulatory agency. 	<ul style="list-style-type: none"> * Monitoring staff * Geologist * Reservoir engineers * Project manager
Injection Period	External impact – injector well.	This event could occur if, during injection, the wellhead is hit by a massive object that causes major damages to the equipment. The well gets disconnected from the pipeline and from the shutoff system and leads to a loss of containment of CO ₂ and brine.	Major	Unlikely	<ul style="list-style-type: none"> * Pressure, temperature, and flow sensors in real time. * Field inspections. * OGI cameras. 	<ul style="list-style-type: none"> * Fence location and block direct access to the wellhead. * No populated area. * Doubled lined pads. * Location is able to contain 70.000 bbl, and additional transfer pump and lines are designed to move fluid to the settling ponds southwest of the location. 	<ul style="list-style-type: none"> * Trigger alarm by the system or operations staff. * Follow protocol to shut down CO₂ delivery if the automatic shutoff device is not functional. * If there is injured personnel, call emergency team, and execute evacuation protocol. * Contact the field superintendent to activate emergency plan. * Clear the location, and secure the perimeter. If possible, install containment devices around the location. * Contact well control special team to execute blowout emergency plan that may include but is not limited to capping the well, secure location, drill relief well to kill injector, properly repair or abandon injection well. This plan would be discussed with the regulatory agency. * Evaluate environmental impact (soil, water, fauna, vegetation), and present remediation plan to the Commission for approval. * Execute remediation, and install monitoring system as needed. 	<ul style="list-style-type: none"> * Operation engineer * Field superintendent * Project manager * Rig crew and DH contractors * Remediation contractors * Well control specialist

Injection Period Postinjection	External impact – monitoring well.	This event could occur if the wellhead of the deep monitoring well is hit by a massive object that causes major damages leading to a LOC. Since the well is open to the formation pressure at the injection zone, formation fluids have the potential to flow and spill on the location.	Major	Unlikely	<ul style="list-style-type: none"> * Pressure, temperature, and flow sensors in real time. * Field inspections. * OGI cameras. 	<ul style="list-style-type: none"> * Fence location, and block direct access to the wellhead. * No populated area. * Lined pads. * Reduced pressure in the monitoring well compared with the injector well on bottom. 	<ul style="list-style-type: none"> * Trigger alarm by the system or operations staff. * If there is injured personnel, call emergency team and execute evacuation protocol. * Contact the field superintendent to activate emergency plan. * Clear the location, and secure the perimeter. If possible, install containment devices around the location. * Contact well control special team to execute blowout emergency plan that may include, but is not limited to, capping the well, securing the location, drilling relief well to kill the injector, properly repairing, or abandoning the injection well. This plan would be discussed with the regulatory agency. * Evaluate environmental impact (soil, water, fauna, vegetation), and present remediation plan to the Commission for approval. * Execute remediation, and install monitoring system as needed. 	<ul style="list-style-type: none"> * Operation engineer * Field superintendent * Project manager * Rig crew and DH contractors * Remediation contractors * Well control specialist
Injection Period	External impact – pipeline.	This event could occur if, during injection, the CO ₂ pipeline is hit, causing major damages and LOC of the CO ₂ .	Major	Unlikely	<ul style="list-style-type: none"> * Pressure, temperature, and flowmeter sensors in real time. * Field inspections. * OGI cameras? 	<ul style="list-style-type: none"> * Buried pipe. * Bollards and/or concrete barriers installed to protect aboveground piping at valve stations. * Painting for visibility in varied weather conditions. * Signage along right of way as needed. * One-call 811 program. 	<ul style="list-style-type: none"> * Trigger alarm by the system or operations staff. * If there is injured personnel, call emergency team, and execute evacuation protocol. * Verify CO₂ flow was shut off by the system, or start protocol to stop flow. * Contact the field superintendent to activate emergency plan. * Clear the location, and secure the perimeter. If possible, install containment devices around the location. * Evaluate environmental impact (soil, water, fauna, vegetation), and present remediation plan to the Commission for approval. * Execute remediation, and install monitoring system as needed. 	<ul style="list-style-type: none"> * Operation engineer * Field superintendent * Remediation contractors * Emergency teams * Plant manager/contact
Injection Period	Monitoring equipment failure or malfunction.	If there is a failure on the monitoring system/ alarm devices, it could lead to overpressurization of the system or reservoir beyond the design limits, causing potential fracturing of the reservoir, leaks or failure on equipment and tubulars, and damage of the facilities.	Serious	Unlikely	<ul style="list-style-type: none"> * Real-time monitoring system and redundancy. * Field inspections. 	<ul style="list-style-type: none"> * Preventive maintenance. * Periodic inspections. 	<ul style="list-style-type: none"> * Trigger alarm by the system or operations staff. * If there is injured personnel or property damage, contact the field superintendent to activate emergency evacuation and secure location. * Assess mechanical integrity of the system, and propose repair actions if needed. * Assess any potential environmental impact, and discuss remedial action with the Commission if needed. * If the assessment allows resuming injection safely, discuss plan with the Commission, and get approval. * Repair or replace instrumentation. Calibrate equipment. * Review monitoring records, and if needed, perform an injectivity test or falloff test to evaluate reservoir. 	<ul style="list-style-type: none"> * Operation engineer * Field superintendent * Project manager * Remediation contractors * Emergency teams * Geologist * Reservoir engineers * Monitoring staff

Injection Period	Induced seismicity.	This event could occur if pressurization of the reservoir, during injection of CO ₂ , activates preexisting fault planes and creates a displacement that causes a seismic event. If it's a major event (>2.7 Richter), it could compromise the integrity of the wells, facilities, or pipeline.	Major	Unlikely	<ul style="list-style-type: none"> * Geophones array in surface to monitor induced seismicity. * Geophones/DAS fiber. 	<ul style="list-style-type: none"> * Seismic survey of the storage complex shows no faults that could be reactivated. * A detailed geomechanical model was created to evaluate the storage complex. * The region is seismically stable. 	<p>Event < 2.7 Richter:</p> <ul style="list-style-type: none"> * Trigger alarm by monitoring personnel. * Review monitoring parameters to validate normal operations. If parameters indicate a potential mechanical integrity failure, follow procedure for Event > 2.7 Richter. * Compare storage behavior with the model, and if needed, propose adjustment in operating conditions. <p>Event > 2.7 Richter</p> <ul style="list-style-type: none"> * Trigger alarm by the system or operations staff. * If there is injured personnel or property damages, contact the field superintendent to activate emergency evacuation and secure location. * Follow protocol to stop injection. * Assess mechanical integrity of the system, and propose repair actions based on the findings. * Assess any potential environmental impact, and discuss remedial action with the Commission if needed. * Review regional information as well as monitoring records to determine the origin of the event (natural or induced). * If it's an induced event, reevaluate model, define new injection parameters, and get approval from the Commission. * If the assessment allows resuming injection safely, increase surveillance to validate effectiveness of the actions. 	<ul style="list-style-type: none"> * Operation engineer * Field superintendent * Project manager * Remediation contractors * Emergency teams * Geologist * Reservoir engineers * Monitoring staff
Injection Period Postinjection	Major seismic event.	Major natural seismic event.	Major	Unlikely	<ul style="list-style-type: none"> * Geophones array in surface to monitor induced seismicity. * Geophones/DAS fiber. 	<ul style="list-style-type: none"> * The region is seismically stable. 	<p>Event < 2.7 Richter:</p> <ul style="list-style-type: none"> * Trigger alarm by monitoring personnel. * Review monitoring parameters to validate normal operations. If parameters indicate a potential mechanical integrity failure, follow procedure for Event > 2.7 Richter. <p>Event > 2.7 Richter</p> <ul style="list-style-type: none"> * Trigger alarm by the system or operations staff. * If there is injured personnel or property damage, contact the field superintendent to activate emergency evacuation and secure location. * Follow protocol to stop injection (injection period). * Assess mechanical integrity of the system, and propose repair actions based on the findings. * Assess any potential environmental impact, and discuss remedial action with the Commission if needed. * Review regional information as well as monitoring records to determine the origin of the event (natural or induced). * If the assessment allows resuming injection safely, increase surveillance to validate effectiveness of the actions (injection period). 	<ul style="list-style-type: none"> * Operation engineer * Field superintendent * Project manager * Remediation contractors * Emergency teams * Geologist * Reservoir engineers * Monitoring staff

Injection Period Postinjection	Other major natural disaster.	This scenario could occur in the event of a natural disaster that limits or endangers the normal operation of the Hub.			n/a	n/a	<ul style="list-style-type: none"> * Trigger alarm by the system or operations staff. * If there is injured personnel or property damage, contact the field superintendent to activate emergency evacuation and secure location. * Follow protocol to stop injection. * Assess mechanical integrity of the system, and propose repair actions based on the findings. * Assess any potential environmental impact, and discuss remedial action with the Commission if needed. * If the assessment allows resuming injection safely, increase surveillance to validate effectiveness of the actions. 	<ul style="list-style-type: none"> * Operation engineer * Field superintendent * Project manager * Remediation contractors * Emergency teams * Geologist * Reservoir engineers * Monitoring staff

APPENDIX F
CORROSION CONTROL MATRIX

System	Category	Component	Material	Additional Specs	Temperature		Pressure		Flow Rate (MMscfd)		Fluid Composition	
					Surface	Downhole	Surface	Downhole	Min	Max	External	Internal
Downhole Equipment	Injection well Broom Creek.	Tubing, nipples, XO.	* L80, coated TK-805 or equiv. * 13CR any tail pipe or tubular potentially exposed to carbonic acid.	Internal connection flush, "corrosion barrier-type."	Ambient 6" to 120°F	Max: 140°F	Max: 1,700 psi.	Max: 3,550 psi. Assuming 0.71 psi/ft frac.	50	150	* Packer fluid (corrosion inhibitor additive) from surface to injection packer. * Potential CO ₂ mixed with formation brine in shut-in event in tail pipes during shut-in event.	* CO ₂ Tundra spec. * Potential CO ₂ mixed with formation brine in shut-in event.
Downhole Equipment	Injection well Broom Creek.	Casing.	* L80 from surface to min 200 ft above first injection zone. * CR13 across all injection zones.	Premium connection gas sealed.	Ambient 6" to 120°F	Max: 140°F	Max: 1,700 psi.	Max: 3,550 psi. Assuming 0.71 psi/ft frac.	50	150	* CO ₂ -resistant cement across injection zone and min 200 ft above the seal formation. * Conventional cement above seal formation to surface.	* Packer fluid (corrosion inhibitor additive) from surface to injection packer. * CO ₂ Tundra spec. from injection packer to perforations. * Potential CO ₂ mixed with formation brine in shut-in event.
Downhole Equipment	Injection well Broom Creek.	P/T gauges and carriers.	* Inconel carriers. * Quartz gauges.	n/a	n/a	Max: 140°F	n/a	Max: 3,550 psi. Assuming 0.71 psi/ft frac.	n/a	n/a	* Packer fluid (corrosion inhibitor additive). * Potential CO ₂ mixed with formation brine in shut-in event in tail pipes during shut-in event.	* CO ₂ Tundra spec. * Potential CO ₂ mixed with formation brine in shut-in event.
Downhole Equipment	Injection well Broom Creek.	Electric cable for the gauges.	* Inconel.	n/a	n/a	Max: 140°F	n/a	Max: 3,550 psi. Assuming 0.71 psi/ft frac.	n/a	n/a	* Packer fluid (corrosion inhibitor additive). * Potential CO ₂ mixed with formation brine in shut-in event in tail pipes during shut-in event.	n/a
Downhole Equipment	Injection well Broom Creek.	Packers.	* Nickel-plated. * Hydrogenated nitrile rubber (HNBR), rigid gas decompression (RGD) with 90 D hardness.	Validate with provider.	n/a	Max: 140°F	n/a	Max: 3,550 psi. Assuming 0.71 psi/ft frac.	50	150	* Packer fluid (corrosion inhibitor additive), above packer. * CO ₂ Tundra spec. below packer. * Potential CO ₂ mixed with formation brine below packer.	* CO ₂ Tundra spec. * Potential CO ₂ mixed with formation brine when shut in.
Downhole Equipment	Injection well Broom Creek.	Wellhead.	* Carbon or low-alloy steel.	n/a	Min: 6°F Max: 120°F	n/a	1,700 psi.	n/a	50	150	Ambient air.	n/a
Downhole Equipment	Injection well Broom Creek.	Tree and tubing hanger.	* CC or FF trim.	n/a	Min: 6°F Max: 120°F	n/a	1,700 psi.	n/a	50	150	Ambient air.	* CO ₂ Tundra spec.
Downhole Equipment	Injection well Deadwood.	Tubing, nipples, XO.	* L80, coated TK-805 or equiv.	Internal connection flush, corrosion barrier-type.	Min: 6°F Max: 120°F	Max: 190°F	Max: 2,800 psi.	Max: 5,800 psi. Assuming 0.3 psi/ft fluid and 2,800 psi max on surface.	50	100	* Packer fluid (corrosion inhibitor additive) from surface to injection packer. * Potential CO ₂ mixed with formation brine in shut-in event in tail pipes during shut-in event.	* CO ₂ Tundra spec. * Potential CO ₂ mixed with formation brine in shut-in event.
Downhole Equipment	Injection well Deadwood.	Casing.	* L80 from surface min to 200 ft above first injection zone. * CR13 across all injection zones. * L80 between injection zones.	Premium connection gas sealed.	Min: 6°F Max: 120°F	Max: 190°F	Max: 2,800 psi.	Max: 5,800 psi. Assuming 0.3 psi/ft fluid and 2,800 psi max on surface.	50	100	* CO ₂ -resistant cement across all injection zone and min 200 ft above the seal. * Conventional cement above seal formation to surface.	* Packer fluid (corrosion inhibitor additive) from surface to injection packer. * CO ₂ Tundra spec. from injection packer to perforations. * Potential CO ₂ mixed with formation brine in shut-in event.
Downhole Equipment	Injection well Deadwood.	P/T gauges and carriers.	* Inconel carriers. * Quartz gauges.	n/a	n/a	Max: 190°F	n/a	Max: 5,800 psi. Assuming 0.3 psi/ft fluid and 2,800 psi max on surface.	n/a	n/a	* Packer fluid (corrosion inhibitor additive). * Potential CO ₂ mixed with formation brine in shut-in event in tail pipes during shut-in event.	* CO ₂ Tundra spec. * Potential CO ₂ mixed with formation brine in shut-in event.
Downhole Equipment	Injection well Deadwood.	Electric cable.	* Inconel.	n/a	n/a	Max: 190°F	n/a	Max: 5,800 psi. Assuming 0.3 psi/ft fluid and 2,800 psi max on surface.	n/a	n/a	* Packer fluid (corrosion inhibitor additive). * Potential CO ₂ mixed with formation brine in tail pipes during shut-in event.	n/a
Downhole Equipment	Injection well Deadwood.	Packers.	* Nickel-plated. * HNBR, RGD with 90 D hardness.	n/a	n/a	Max: 190°F	n/a	Max: 5,800 psi. Assuming 0.3 psi/ft fluid and 2,800 psi max on surface.	50	100	* Packer fluid (corrosion inhibitor additive), above packer. * CO ₂ Tundra spec. below packer. * Potential CO ₂ mixed with formation brine below packer.	* CO ₂ Tundra spec. * Potential CO ₂ mixed with formation brine when shut in.
Downhole Equipment	Injection well Deadwood.	Tapered long string hanger.	* Nickel-plated. * HNBR, RGD with 90 D hardness.	Validate with provider.	n/a	Max: 190°F	n/a	Max: 5,800 psi. Assuming 0.3 psi/ft fluid and 2,800 psi max on surface.	n/a	n/a	* CO ₂ -resistant cement.	* Packer fluid (corrosion inhibitor additive).
Downhole Equipment	Injection well Deadwood.	Wellhead.	* Carbon or low-alloy steel.	n/a	Min: 6°F Max: 120°F	n/a	2,800 psi.	n/a	50	100	Ambient air.	n/a
Downhole Equipment	Injection well Deadwood.	Tree and tubing hanger.	* CC or FF trim.	n/a	Min: 6°F Max: 120°F	n/a	2,800 psi.	n/a	50	100	Ambient air.	* CO ₂ Tundra spec.
Downhole Equipment	In-zone monitoring well.	Tubing.	* L80. * 13CR between packers in open zones.	Premium connection gas-sealed.	Min: 6°F Max: 120°F	Max: 190°F	n/a	Max: 5,800 psi. Assuming 0.3 psi/ft fluid and 2,800 psi max on surface.	n/a	n/a	* Packer fluid (corrosion inhibitor additive) from surface to injection packer. * Formation brine between packers in monitoring zone. Once CO ₂ breakthrough, CO ₂ + formation brines.	* Packer fluid. * Formation brines in lower joints.
Downhole Equipment	In-zone monitoring well.	Casing.	* L80 from surface to 200 ft from injection zones. * CR injection zones.	Premium connection gas-sealed.	Min: 6°F Max: 120°F	Max: 190°F	n/a	Max: 5,800 psi. Assuming 0.3 psi/ft fluid and 2,800 psi max on surface.	n/a	n/a	* CO ₂ -resistant cement across all injection zone and min 200 ft above the seal. * Conventional cement above seal formation to surface.	* Packer fluid. * Formation brines. * Formation brines and CO ₂ after breakthrough.
Downhole Equipment	In-zone monitoring well.	P/T gauges and carriers.	* Inconel carriers. * Quartz gauges.	n/a	n/a	Max: 190°F	n/a	Max: 5,800 psi. Assuming 0.3 psi/ft fluid and 2,800 psi max on surface.	n/a	n/a	* Packer fluid. * Formation brines. * Formation brines and CO ₂ after breakthrough.	* Packer fluid. * Formation brines in lower joints.
Downhole Equipment	In-zone monitoring well.	Electric cable.	* Inconel.	n/a	n/a	Max: 190°F	n/a	Max: 5,800 psi. Assuming 0.3 psi/ft fluid and 2,800 psi max on surface.	n/a	n/a	* Packer fluid. * Formation brines. * Formation brines and CO ₂ after breakthrough.	n/a
Downhole Equipment	In-zone monitoring well.	Packers.	* Nickel-plated. * HNBR, RGD with 90 D hardness.	Validate with provider.	n/a	Max: 190°F	n/a	Max: 5,800 psi. Assuming 0.3 psi/ft fluid and 2,800 psi max on surface.	n/a	n/a	* Packer fluid. * Formation brines. * Formation brines and CO ₂ after breakthrough.	* Packer fluid. * Formation brines in lower joints.
Downhole Equipment	In-zone monitoring well.	Wellhead.	* Carbon or low-alloy steel.	n/a	Min: 6°F Max: 120°F	n/a	2,800 psi.	n/a	n/a	n/a	Ambient air.	n/a
Downhole Equipment	In-zone monitoring well.	Tree and tubing hanger.	* Carbon or low-alloy steel.	n/a	Min: 6°F Max: 120°F	n/a	2,800 psi.	n/a	n/a	n/a	Ambient air.	n/a

System	Category	Component	Material	Additional Specs	Temperature	Pressure	Flow Rate (MMscfd)	Fluid Composition		
CO ₂ Pipeline – Minimum Burial Depth 48"	Pipeline.	Pipeline.	API 5L	14–16 mil fusion. Bond epoxy external coating.	Min: 6°F; Max: 120°F	1,800 psig.	224	Ground.	*CO ₂ tundra spec.	
CO ₂ Pipeline – Surface	Pipeline.	Pipeline.	API 5L	Painted.	Min: –50°F; Max: 120°F	1,800 psig.	224	Ambient air.	*CO ₂ tundra spec.	
Surface Piping, Instrumentation, and Pressure Control	Surface scope Broom Creek well.	Surface piping.	API 5L	Painted.	Min: –50°F; Max: 120°F	1,800 psig.	224	Ambient air; heat tracing.	*CO ₂ tundra spec.	
Surface Piping, Instrumentation, and Pressure Control	Surface scope Broom Creek well.	Valves.	Carbon steel body x stainless steel or ENP carbon steel internals.	Soft seats; CO ₂ compatible materials.	Min: –50°F; Max: 120°F	1,800 psig.	156 (each well total flow)	Ambient air; heat tracing.	*CO ₂ tundra spec.	
Surface Piping, Instrumentation, and Pressure Control	Surface scope Broom Creek well.	Instrumentation.	Stainless steel x stainless steel 2" isolating valving (WOG3000); in-line instrumentation per piping specification.		Varied.	Varied.	1,800 psig.	Varied	Ambient air; heat tracing.	*CO ₂ tundra spec.
Surface Piping, Instrumentation, and Pressure Control	Surface scope Broom Creek well.	Injection pressure gauge.			Min: 6°F; Max: 120°F	Design pressure: 1,800 psig. Analog gauge operating range: 1,500–3,000 psig.	n/a	n/a	Ambient air; heat tracing.	*CO ₂ tundra spec.
Surface Piping, Instrumentation, and Pressure Control	Surface scope Broom Creek well.	Injection rate meter.	Carbon steel body x stainless steel internals.	Senior orifice meter.	Min: 6°F; Max: 120°F	1,800 psig.	50–160 (each well flow range)		Ambient air; heat tracing.	*CO ₂ tundra spec.
Surface Piping, Instrumentation, and Pressure Control	Surface scope Broom Creek well.	Injection temperature gauge.			Operating range: –40°–200°F.		n/a	n/a	Ambient air; heat tracing.	*CO ₂ tundra spec.
Surface Piping, Instrumentation, and Pressure Control	Surface scope Broom Creek well.	Emergency shutdown valve.	Carbon steel body x stainless steel internals.	Soft seats; CO ₂ compatible materials.	Min: –50°F; Max: 120°F	1,800 psig.	n/a	n/a	Ambient air; heat tracing.	*CO ₂ tundra spec.
Surface Piping, Instrumentation, and Pressure Control	Surface scope Deadwood well.	Surface piping.	API 5L	Painted.	Min: –50°F; Max: 120°F	3,500 psig.	68		Ambient air; heat tracing.	*CO ₂ tundra spec.
Surface Piping, Instrumentation, and Pressure Control	Surface scope Deadwood well.	Valves.	Carbon steel body x stainless steel or ENP carbon steel internals.	Soft seats; CO ₂ compatible materials.	Min: –50°F; Max: 120°F	3,500 psig.	68		Ambient air; heat tracing.	*CO ₂ tundra spec.
Surface Piping, Instrumentation, and Pressure Control	Surface scope Deadwood well.	Instrumentation.	Stainless steel x stainless steel 2" isolating valving (WOG3000); in-line instrumentation per piping specification.		Varied.	Varied.	3,500 psig.	Varied.	Ambient air; heat tracing.	*CO ₂ tundra spec.
Surface Piping, Instrumentation, and Pressure Control	Surface scope Deadwood well.	Injection pressure gauge.			Min: 6°F; Max: 120°F	Design pressure: 3,500 psig. Analog gauge operating range: 2,000–4,000 psig.	n/a	n/a	Ambient air; heat tracing.	*CO ₂ tundra spec.
Surface Piping, Instrumentation, and Pressure Control	Surface scope Deadwood well.	Injection rate meter.	Carbon steel body x stainless steel internals.	Senior orifice meter.	Min: 6°F; Max: 120°F	3,500 psig.	30–70		Ambient air; heat tracing.	*CO ₂ tundra spec.
Surface Piping, Instrumentation, and Pressure Control	Surface scope Deadwood well.	Injection temperature gauge.			Operating Range: –40°–200°F		n/a	n/a	Ambient air; heat tracing.	*CO ₂ tundra spec.
Surface Piping, Instrumentation, and Pressure Control	Surface scope Deadwood well.	Emergency shutdown valve.	Carbon steel body x stainless steel internals.	Soft seats; CO ₂ compatible materials.	Min: 6°F; Max: 120°F	3,500 psig.	n/a	n/a	Ambient air; heat tracing.	*CO ₂ tundra spec.



Corrosion Control Program – Corrosion Control Matrix

System	Category	Equipment or Component	Damage Mechanism	Mitigation	Monitoring Activity	Location	Frequency	Limits	Consequences	Remedial Action	Remedial Action Responsible Person	Remedial Action Time Limit
Downhole Equipment	Injection Wells	Tubing , Nipples, X/O	CO ₂ Corrosion	<ul style="list-style-type: none"> * Dehydrated CO₂ to 630 ppm of H₂O Injected. * Internal coating applied to the tubing. * CR13 specification for tail pipe below packers. * Inhibited packer fluid. 	<ol style="list-style-type: none"> 1. Electromagnetic logging. 2. Corrosion coupons. 3. Pressure and temperature gauges. 4. Annular pressure test. 	<ol style="list-style-type: none"> 1. Log run through tubing. 2. Installed upstream injection wellhead. 3. Wellhead and on top of the packer. 4. Surface. 	<ol style="list-style-type: none"> 1. Every 5 years. 2. Quarterly. 3. Real time. 4. Every 5 years. 	<ul style="list-style-type: none"> * Failure detected. * High risk assessed by the monitoring technique. 	Stop of injection is required by permit once the failure is detected.	<ol style="list-style-type: none"> 1. Stop injection. 2. Troubleshoot the well. 3. If loss of mechanical integrity is validated, prepare workover proposal. 4. Inform Commission within 24 hr and discuss with action plan. 5. Pull tubing and packer scanning . 6. Run casing inspection log. 7. If well has casing integrity , run back completion hydrotesting. 8. Perform annular pressure test. 9. Run CIL log through tubing. 10. Perform falloff test. 11. Perform root cause analysis, and report finding to corrosion database. 	<ol style="list-style-type: none"> 1. Field Manager. 2. Project Manager. 3. Downhole maintenance crew. 	1. The well needs to be repaired and put back on injection within 90 days; request an extension or P&A.
Downhole Equipment	Injection Wells	Casing	CO ₂ Corrosion	<ul style="list-style-type: none"> * CR13 material selected across CO₂ injection zones. * CO₂-resistant cement covering injection zone interval. * Injection though packer and tubing. * Casing cemented to surface. * Continous injection. 	<ol style="list-style-type: none"> 1. Electromagnetic logging. 2. Corrosion coupons. 3. Pressure and temperature gauges. 4. DTS fiber technology. 5. Annular pressure test. 	<ol style="list-style-type: none"> 1. Log run through tubing. 2. Installed upstream injection wellhead. 3. Wellhead and on top of the packer. 4. Casing exterior. 5. Surface. 	<ol style="list-style-type: none"> 1. Every 5 years. 2. Quarterly. 3. Real time. 4. Real time. 5. Every 5 years. 	<ul style="list-style-type: none"> * Failure detected. * High risk assessed by the monitoring technique. 	Stop of injection is required by permit once the failure is detected.	<ol style="list-style-type: none"> 1. Stop injection. 2. Troubleshoot the well. 3. If loss of mechanical integrity is validated, prepare workover proposal. 4. Inform Commission within 24 hr, and discuss with action plan. 5. Pull tubing and packer. 6. Run casing inspection log. 7. If required, propose casing repair program or P&A and discuss with Commission, based on the findings. 8. Once the casing is repaired, run back completion hydrotesting. 9. Perform annular pressure test. 10. Run CIL log through tubing. 11. Perform falloff test. 12. Perform root cause analysis, and report finding to corrosion database. 	<ol style="list-style-type: none"> 1. Field Manager. 2. Project Manager. 3. Downhole maintenance crew. 	1. The well needs to be repaired and put back on injection within 90 days; request an extension or P&A.
Downhole Equipment	Injection Wells	P/T Gauges & Carriers	CO ₂ Corrosion	<ul style="list-style-type: none"> * Inconel carriers and quartz gauges. * Packer inhibited fluid in the annular in contact with the tools. 	<ol style="list-style-type: none"> 1. Real-time data transfer. 2. Electromagnetic logging. 3. Annular pressure test. 	<ol style="list-style-type: none"> 1. n/a 2. Log run through tubing. 3. Surface test. 	<ol style="list-style-type: none"> 1. Real time. 2. Annually. 3. Annually. 	<ul style="list-style-type: none"> * Failure detected. * High risk assessed by the monitoring technique. 	Replace or repair tool.	<ol style="list-style-type: none"> 1. Stop injection. 2. Perform annular pressure test to identify any loss of mechanical integrity in tubing or casing above injection zone. 3. If the well has integrity, inform Commission within 24 hr, and discuss WO or alternative to replace the gauge or aquire the date. 4. If the Commission approves, continue injection while the remedial action is taken. 5. During well service to repair or replace the gauges and carriers, run casing integrity log and pressure test well, inspect tubing, and change any defective equipment on the completion. 6. Identify root cause of failure to take remedial actions, and record the findings in the corrosion management database. 	<ol style="list-style-type: none"> 1. Field Manager. 2. Project Manager. 3. Downhole maintenance crew. 	1. If the well proves mechanical integrity, discuss time of the repair with the Commission.

Downhole Equipment	Injection Wells	Electric Cable	CO ₂ Corrosion	* Inconel material * Packer inhibited fluid in the annular in contact with the tools.	* Real-time data transfer.	n/a	* Real time.	* Failure detected.	Replace or repair tool.	1. Troubleshoot the system. 2. Review monitoring data. 3. If the well has integrity, inform Commission within 24 hr, and discuss WO or alternative to replace cable or acquire data. 4. Prepare plan for replacement or repair of the equipment. 5. Upon Commission approval, continue injection and monitor pressure with surface gauges.	1. Field Manager. 2. Project Manager. 3. Downhole maintenance crew.	1. If the well proves mechanical integrity, discuss time of the repair with the Commission.
Downhole Equipment	Injection Wells	Packers	CO ₂ Corrosion	* Nickel-plated packers. * Elastomers HNBR (RGD).	1. Pressure and temperature gauges surface and downhole. 2. DST fiber alongside the casing. 3. Annular pressure test.	1. Wellhead and downhole. 2. Casing. 3. Surface test.	1. Real time. 2. Real time. 3. Annually.	* Failure detected. * High risk assessed by the monitoring technique.	Stop of injection is required by permit once the failure is detected.	1. Stop injection. 2. Troubleshoot the well. 3. If loss of mechanical integrity is validated, prepare workover proposal. 4. Inform Commission within 24 hr, and discuss with action plan. 5. Pull tubing and packer scanning. 6. Run casing inspection log. 7. If well has casing integrity, run back completion hydrotesting. 8. Perform annular pressure test. 9. Run CIL log through tubing. 10. Perform falloff test. 11. Perform root cause analysis, and report finding to corrosion database.	1. Field Manager. 2. Project Manager. 3. Downhole maintenance crew.	1. The well needs to be repaired and put back on injection within 90 days; request an extension or P&A.
Downhole Equipment	Injection Wells	Wellhead	CO ₂ Corrosion Atmospheric Corrosion	* Wellhead sections are not in contact with CO ₂ or formation fluids.	1. Preventive maintenance. 2. Visual inspection. 3. Function test.	1. Surface. 2. Surface.	1. Quarterly. 2. Weekly.	* Damage detected.	Replace or repair equipment (potentially the valves).	1. Perform inspection with wellhead provider. 2. Define replacement or repair procedure.	1. Field Manager. 2. Project Manager. 3. Surface maintenance team. 4. Downhole maintenance team.	n/a
Downhole Equipment	Injection Wells	Tree	CO ₂ Corrosion Atmospheric Corrosion	* FF trim selected in the wellhead. * Dry CO ₂ injected, no H ₂ S in the system.	1. Preventive maintenance. 2. Visual inspection. 3. Function test.	Surface.	1. Quarterly. 2. Weekly. 3. By manufacturer recommendation.	* Damage or malfunction detected.	Stop injection to replace equipment.	1. Stop injection. 2. Perform inspection by wellhead specialist. 3. Define action plan based on findings.	1. Field Manager. 2. Project Manager. 3. Surface maintenance team. 4. Downhole maintenance team.	To be defined by the procedure and findings.
Downhole Equipment	Injection Wells	Tubing Hanger	CO ₂ Corrosion	* FF trim selected in the wellhead. * Dry CO ₂ injected, no H ₂ S in the system.	1. Surface pressure gauges.	1. Surface. 2. Surface.	1. Real time.	* Damage or malfunction detected.	Stop of injection is required by permit once the failure is detected.	1. Stop injection. 2. Troubleshoot the well. 3. If loss of mechanical integrity is validated, prepare workover proposal. Actions will depend on the assessment and troubleshooting. 4. Inform Commission within 24 hr, and discuss with action plan. 5. Execute repair. 6. Perform root cause analysis, and report finding to corrosion database.	1. Field Manager. 2. Project Manager. 3. Surface maintenance team. 4. Downhole maintenance team.	1. The well needs to be repaired and put back on injection within 90 days; request an extension or P&A.
Downhole Equipment	Injection Wells	Tapered Long String Hanger	CO ₂ Corrosion	* CO ₂ -resistant cement. * Inhibited packer fluids above tapered long string. * Top packer seal. * Continuous injection. * Elastomers HNBR (RGD).	1. Corrosion coupons. 2. Pressure and temperature gauges. 3. DTS fiber technology.	1. Installed upstream injection wellhead. 2. Wellhead and on top of the packer. 3. Casing exterior.	1. Quarterly. 2. Real time. 3. Real time.	* Failure detected. * High risk assessed by the monitoring technique.	Stop of injection is required by permit once the failure is detected.	1. Stop injection. 2. Troubleshoot the well. 3. If loss of mechanical integrity is validated, prepare workover proposal. 4. Inform Commission within 24 hr, and discuss with action plan. 5. Pull tubing and packer. 6. Run casing inspection log. 7. If needed, pressure-test the casing with straddle packers. 8. If damage in the tapered long string hanger is detected, prepare workover proposal, and discuss it with the Commission. 9. Once the tapered long string hanger is repaired, run back upper completion hydrotesting. 10. Perform annular pressure test. 11. Run CIL log through tubing. 12. Perform falloff test. 13. Perform root cause analysis, and report	1. Field Manager. 2. Project Manager. 3. Downhole maintenance crew.	1. The well needs to be repaired and put back on injection within 90 days; request an extension or P&A.

Downhole Equipment	Monitoring Wells	Tubing , Nipples, X/O	CO ₂ Corrosion	* CR13 metallurgic for tail pipe below/between packers. * Inhibited packer fluid.	1. Electromagnetic logging. 2. Corrosion coupons. 3. Pressure and temperature gauges. 4. Annular pressure test.	1. Log run through tubing. 2. Installed upstream injection wellhead. 3. Wellhead and on top of the packer. 4. Surface.	1. Annually . 2. Quarterly. 3. Real time. 4. Annually.	* Failure detected. * High risk assessed by the monitoring technique.	* Lost of information for plume monitoring. * Corrosion from formation brines if it's not repaired.	1. Trigger alarm from monitoring system/operator. 2. Troubleshoot the well. 3. If loss of mechanical integrity is validated, prepare workover proposal. 4. Inform Commission within 24 hr, and discuss with action plan. 5. Pull tubing and packer scanning. 6. Run casing inspection log. 7. If well has casing integrity, run back completion hydrotesting. 8. Perform annular pressure test. 9. Run CIL log through tubing. 10. Perform root cause analysis, and report finding to corrosion database.	1. Field Manager. 2. Project Manager. 3. Downhole maintenance crew.	1. The well needs to be repaired and put back within a year; request an extension or P&A.
Downhole Equipment	Monitoring Wells	Casing	CO ₂ Corrosion	* CR13 metallurgic across injection zones. * Inhibited packer fluid in annular above injection zones. * Casing cemented to surface. * Isolated monitoring zone with packer across injection targets.	1. Electromagnetic logging. 2. Corrosion coupons. 3. Pressure and temperature gauges. 4. Annular pressure test.	1. Run through tubing. 2. Installed upstream injection wellhead. 3. Surface and downhole. 4. Surface.	1. Annually . 2. Quarterly. 3. Real time. 4. Annually.	* Failure detected. * High risk assessed by the monitoring technique.	* Lost of information for plume monitoring. * Corrosion from formation brines if it's not repaired.	1. Trigger alarm from monitoring system/operator. 2. Troubleshoot the well. 3. If loss of mechanical integrity is validated, prepare workover proposal. 4. Inform Commission within 24 hr, and discuss with action plan. 5. Pull tubing and packer. 6. Run casing inspection log. 7. If required, propose casing repair program or P&A, and discuss with director, based on the findings. 8. Once the casing is repaired, run back completion hydrotesting. 9. Perform annular pressure test. 10. Run CIL log through tubing. 11. Perform root cause analysis and report finding to corrosion database.	1. Field Manager. 2. Project Manager. 3. Downhole maintenance crew.	1. The well needs to be repaired and put back within a year; request an extension or P&A.
Downhole Equipment	Monitoring Wells	P/T Gauges & Carriers	CO ₂ Corrosion	* Inconel carriers and quartz gauges.	1. Real-time data transfer. 2. Electromagnetic logging. 3. Annular pressure test.	1.n/a 2. Log run through tubing. 3. Surface test.	1. Real time. 2. Annually. 3. Annually.	* Failure detected. * High risk assessed by the monitoring technique.	Replace or repair tool.	1. Trigger alarm from monitoring system/operator. 2. Troubleshoot the well. 3. Perform annular pressure test to identify any loss of mechanical integrity in tubing or casing above packers. 4. If the well has integrity, inform Commission within 24 hr, and discuss WO or alternative to replace the gauge or acquire the date. 6. During well service to repair or replace the gauges and carriers, run electromagnetic integrity log to verify condition of the casing, replace any packer or equipment damaged, and hydrotest tubing. 7. Identify root cause of failure to take preventive actions, and record findings in the corrosion management database.	1. Field Manager. 2. Project Manager. 3. Downhole maintenance crew.	1. If the well proves mechanical integrity, discuss time of the remediation with the Commission.
Downhole Equipment	Monitoring Wells	Electric Cable	CO ₂ Corrosion	* Inconel material. * Packer inhibited fluid in the annular in contact with the tools.	* Real-time data transfer.	n/a	* Real time.	* Failure detected.	Replace or repair tool.	1. Troubleshoot the system. 2. Review monitoring data. 3. If the well has integrity, inform Commission within 24 hr, and discuss WO or alternative to replace cable or acquire data. 4. Prepare plan for replacement or repair of the equipment. 5. Upon Commission approval, continue injection and monitor pressure with surface gauges.	1. Field Manager. 2. Project Manager. 3. Downhole maintenance crew.	1. If the well proves mechanical integrity, discuss time of the repair with the Commission.

Downhole Equipment	Monitoring Wells	Packers	CO ₂ Corrosion	* Nickel-plated packers. * Elastomers HNBR (RGD).	1. Pressure and temperature gauges surface and downhole. 2. DST fiber alongside the casing. 3. Annular pressure test.	1. Wellhead and downhole. 2. Casing. 3. Surface test.	1. Real time. 2. Real time. 3. Annually.	* Failure detected. * High risk assessed by the monitoring technique.	* Lost of information for plume monitoring. * Corrosion from formation brines if it's not repaired.	1. Stop injection. 2. Troubleshoot the well. 3. If loss of mechanical integrity is validated, prepare workover proposal. 4. If the well has integrity, inform Commission within 24 hr, and discuss WO or alternative to replace the gauge or acquire the data. 5. Pull tubing and packer scanning. 6. Run casing inspection log. 7. If well has casing integrity, run back completion hydrotesting. 8. Perform annular pressure test. 9. Run CIL log through tubing. 10. Perform falloff test. 11. Perform root cause analysis, and report finding to corrosion database.	1. Field Manager. 2. Project Manager. 3. Downhole maintenance crew.	1. The well needs to be repaired and put back on injection within 1 year; request an extension or P&A.
Downhole Equipment	Monitoring Wells	Wellhead / Tree	CO ₂ Corrosion Atmospheric Corrosion	* Wellhead and tree section are not in contact with CO ₂ or formation fluids.	1. Preventive maintenance. 2. Visual inspection. 3. Function test.	1. Surface. 2. Surface. 3. Surface.	1. Quarterly. 2. Weekly. 3. By manufacturer recommendation	* Damage detected.	Replace or repair equipment (potentially the valves).	1. Perform inspection with wellhead provider. 2. Define replacement or repair procedure based on the findings.	1. Field Superintendent. 2. Project Manager. 3. Surface maintenance team.	n/a
CO ₂ Pipeline	CO ₂ Pipeline	API-5L Line Pipe	CO ₂ in the Presence of H ₂ O	Dehydrate the CO ₂ to 630 ppm of H ₂ O (30 #/MMscf).	1. ILL smart pig the pipeline every 5 years. 2. Annual cathodic protection potential survey. 3. Monitor cathodic protection rectifier monthly. 4. DCVG survey every 5 years (DOT pipeline). 5. Analyze product for H ₂ O levels above 30 lb/MMscf with shut-off capabilities prior to entering pipelines. 6. Coupon test station near pipeline inlet.	n/a	1. Every 5 years. 2. Annually. 3. Monthly 4. Every 5 years. 5. Continuously. 6. Monthly.	* Failure detected. * High risk assessed by the monitoring technique.	Depends on the severity of the finding during examination.	TBD by the severity of the finding on the examination.	Mechanical Integrity (MI) personnel in charge of the pipeline.	TBD by the severity of the finding on the examination.
Surface Piping, Instrumentation, and Pressure Control	Surface Piping, Instrumentation, and Pressure Control	Surface Piping	CO ₂ Corrosion	*CO ₂ dehydrated to 630 ppm H ₂ O injected (30 lb/MMscf). *Selection of materials for CO ₂ service.	1. Corrosion coupons. 2. Monitoring of CO ₂ composition from capture facility.	1. Surface. 2. Capture facility.	1. Quarterly. 2. Real time. 3. Real time.	* Failure detected. * High risk assessed by the monitoring technique.	Depends on the severity of the finding during examination; noncritical instrumentation may be isolated and replaced online; critical instruments and valves will require shutdown.	Replacement of piping segment, depending on severity of examination.	MI personnel in charge of the surface facility.	TBD by the severity of the finding on the examination.
Surface Piping, Instrumentation, and Pressure Control	Surface Piping, Instrumentation, and Pressure Control	Valves	CO ₂ Corrosion	*CO ₂ dehydrated to 630 ppm H ₂ O injected (30 lb/MMscf). *Selection of materials for CO ₂ service.	1. Corrosion coupons. 2. Monitoring of CO ₂ composition from capture facility.	1. Surface. 2. Capture facility.	1. Quarterly. 2. Real time. 3. Real time.	* Failure detected. * High risk assessed by the monitoring technique.	Depends on the severity of the finding during examination; noncritical instrumentation may be isolated and replaced online; critical instruments and valves will require shutdown.	Replacement of valve, depending on severity of examination.	MI personnel in charge of the surface facility.	TBD by the severity of the finding on the examination and criticality of valve.
Surface Piping, Instrumentation, and Pressure Control	Surface Piping, Instrumentation, and Pressure Control	Instrumentation	CO ₂ Corrosion	*CO ₂ dehydrated to 630 ppm H ₂ O injected (30 lb/MMscf). *Selection of materials for CO ₂ service.	1. Corrosion coupons. 2. Monitoring of CO ₂ composition from capture facility. 3. Visual inspection.	1. Surface. 2. Capture facility. 3. Surface.	1. Quarterly. 2. Real time. 3. Weekly site visits.	* Failure detected. * High risk assessed by the monitoring technique.	Depends on the severity of the finding during examination; noncritical instrumentation may be isolated and replaced online; critical instruments and valves will require shutdown.	Replacement of instrumentation, depending on severity of examination.	MI personnel in charge of the surface facility.	TBD by the severity of the finding on the examination and criticality of the instrument.
Surface Piping, Instrumentation, and Pressure Control	Surface Piping, Instrumentation, and Pressure Control	Injection Pressure Gauge	CO ₂ Corrosion	*CO ₂ dehydrated to 630 ppm H ₂ O injected (30 lb/MMscf). *Selection of materials for CO ₂ service.	1. Corrosion coupons. 2. Monitoring of CO ₂ composition from capture facility. 3. Visual inspection.	1. Surface. 2. Capture facility. 3. Surface.	1. Quarterly. 2. Real time. 3. Weekly site visits.	* Failure detected. * High risk assessed by the monitoring technique.	Depends on the severity of the finding during examination; critical instruments and valves will require shutdown.	Replacement of instrumentation, depending on severity of examination	MI personnel in charge of the surface facility.	Immediate action required to maintain compliance. Pressure must be monitored during injection.
Surface Piping, Instrumentation, and Pressure Control	Surface Piping, Instrumentation, and Pressure Control	Injection Rate Meter	CO ₂ Corrosion	*CO ₂ dehydrated to 630 ppm H ₂ O injected (30 lb/MMscf). *Selection of materials for CO ₂ service.	1. Corrosion coupons. 2. Monitoring of CO ₂ composition from capture facility. 3. Visual inspection of orifice plate using senior fittings.	1. Surface. 2. Capture facility. 3. Surface.	1. Quarterly. 2. Real time. 3. Quarterly.	* Failure detected. * High risk assessed by the monitoring technique.	Depends on the severity of the finding during examination; critical instruments and valves will require shutdown.	Replacement of instrumentation, depending on severity of examination	MI personnel in charge of the surface facility.	Immediate action required to maintain compliance. Rate must be monitored during injection.
Surface Piping, Instrumentation, and Pressure Control	Surface Piping, Instrumentation, and Pressure Control	Injection Temperature Gauge	CO ₂ Corrosion	*CO ₂ dehydrated to 630 ppm H ₂ O injected (30 lb/MMscf). *Selection of materials for CO ₂ service.	1. Corrosion coupons. 2. Monitoring of CO ₂ composition from capture facility. 3. Visual inspection.	1. Surface. 2. Capture facility. 3. Surface.	1. Quarterly. 2. Real time. 3. Weekly site visits.	* Failure detected. * High risk assessed by the monitoring technique.	Depends on the severity of the finding during examination; critical instruments and valves will require shutdown.	Replacement of instrumentation, depending on severity of examination.	MI personnel in charge of the surface facility.	Immediate action required to maintain compliance. Temperature must be monitored during injection.

Surface Piping, Instrumentation, and Pressure Control	Surface Piping, Instrumentation, and Pressure Control	Emergency Shutdown Valve	CO ₂ Corrosion	*CO ₂ dehydrated to 630 ppm H ₂ O injected (30 lb/MMscf). *Selection of materials for CO ₂ service.	1. Corrosion coupons. 2. Monitoring of CO ₂ composition from capture facility. 3. Testing of valve integrity.	1. Surface. 2. Capture facility. 3. Surface.	1. Quarterly. 2. Real time. 3. By manufacturer recommendation.	* Failure detected. * High risk assessed by the monitoring technique.	Depends on the severity of the finding during examination; critical instruments and valves will require shutdown.	Replacement of valve, depending on severity of examination.	MI personnel in charge of the surface facility.	Immediate action required to maintain compliance. Shutoff capability must be maintained during injection.
Surface Piping, Instrumentation, and Pressure Control	Surface Piping, Instrumentation, and Pressure Control	Surface Piping	Corrosion under Insulation (CUI)	*External painting.	1. Visual inspection.	1. Surface.	1. Site visits/expected weekly activity.	* Failure detected.	n/a	Repainting and replacement of insulation.	MI personnel in charge of the surface facility.	TBD by the severity of the finding on the examination.
Surface Piping, Instrumentation, and Pressure Control	Surface Piping, Instrumentation, and Pressure Control	Valves	CUI	*External painting.	1. Visual inspection.	1. Surface.	1. Site visits/expected weekly activity.	* Failure detected.	n/a	Repainting and replacement of insulation.	MI personnel in charge of the surface facility.	TBD by the severity of the finding on the examination and criticality of valve.
Surface Piping, Instrumentation, and Pressure Control	Surface Piping, Instrumentation, and Pressure Control	Instrumentation	CUI	*Stainless steel materials.	1. Visual inspection.	1. Surface.	1. Site visits/expected weekly activity.	* Failure detected.	n/a	Repainting and replacement of insulation.	MI personnel in charge of the surface facility.	TBD by the severity of the finding on the examination and criticality of instrument.
Surface Piping, Instrumentation, and Pressure Control	Surface Piping, Instrumentation, and Pressure Control	Injection Pressure Gauge	CUI	*Stainless steel materials.	1. Visual inspection.	1. Surface.	1. Site visits/expected weekly activity.	* Failure detected.	n/a	Repainting and replacement of insulation.	MI personnel in charge of the surface facility.	Immediate action required to maintain compliance. Pressure must be monitored during injection.
Surface Piping, Instrumentation, and Pressure Control	Surface Piping, Instrumentation, and Pressure Control	Injection Rate Meter	CUI	*External painting.	1. Visual inspection.	1. Surface.	1. Site visits/expected weekly activity.	* Failure detected.	n/a	Repainting and replacement of insulation.	MI personnel in charge of the surface facility.	Immediate action required to maintain compliance. Rate must be monitored during injection.
Surface Piping, Instrumentation, and Pressure Control	Surface Piping, Instrumentation, and Pressure Control	Injection Temperature Gauge	CUI	* Stainless steel materials.	1. Visual inspection.	1. Surface.	1. Site visits/expected weekly activity.	* Failure detected.	n/a	Repainting and replacement of insulation.	MI personnel in charge of the surface facility.	Immediate action required to maintain compliance. Temperature must be monitored during injection.
Surface Piping, Instrumentation, and Pressure Control	Surface Piping, Instrumentation, and Pressure Control	Emergency Shutdown Valve	CUI	* External painting.	1. Visual inspection.	1. Surface.	1. Site visits/expected weekly activity.	* Failure detected.	n/a	Repainting and replacement of insulation.	MI personnel in charge of the surface facility.	Immediate action required to maintain compliance. Shutoff capability must be maintained during injection.
Surface Piping, Instrumentation, and Pressure Control	Surface Piping, Instrumentation, and Pressure Control	Surface Piping	Brittle Fracture	*Insulation/heat tracing to provide cold-weather protection. *Building/structure.	1. Visual inspection. 2. Monitoring heat tracing and maintenance per vendor requirements.	1. Surface 2. Surface	1. Site visits/expected weekly activity. 2. Per vendor requirements.	* Failure detected. * High risk assessed by the monitoring technique.	Depends on the severity of the finding during examination; shutdown may be required.	Replacement or repair of insulation/heat tracing. Potential replacement of piping depending on results of inspection.	MI personnel in charge of the surface facility.	TBD by the severity of the finding on the examination.
Surface Piping, Instrumentation, and Pressure Control	Surface Piping, Instrumentation, and Pressure Control	Valves	Brittle Fracture	*Insulation/heat tracing to provide cold-weather protection. *Building/structure.	1. Visual inspection. 2. Monitoring heat tracing and maintenance per vendor requirements.	1. Surface 2. Surface	1. Site visits/expected weekly activity. 2. Per vendor requirements.	* Failure detected. * High risk assessed by the monitoring technique.	Depends on the severity of the finding during examination; shutdown may be required.	Replacement or repair of insulation/heat tracing. Potential replacement of valve(s) depending on results of inspection.	MI personnel in charge of the surface facility.	TBD by the severity of the finding on the examination and criticality of valve.
Surface Piping, Instrumentation, and Pressure Control	Surface Piping, Instrumentation, and Pressure Control	Instrumentation	Brittle Fracture	*Insulation/heat tracing to provide cold-weather protection. *Building/structure.	1. Visual inspection. 2. Monitoring heat tracing and maintenance per vendor requirements.	1. Surface 2. Surface	1. Site visits/expected weekly activity. 2. Per vendor requirements.	* Failure detected. * High risk assessed by the monitoring technique.	Depends on the severity of the finding during examination; shutdown may be required.	Replacement or repair of insulation/heat tracing. Potential replacement of instrumentation depending on results of inspection.	MI personnel in charge of the surface facility.	TBD by the severity of the finding on the examination and criticality of instrument.
Surface Piping, Instrumentation, and Pressure Control	Surface Piping, Instrumentation, and Pressure Control	Injection Pressure Gauge	Brittle Fracture	*Insulation/heat tracing to provide cold-weather protection. *Building/structure.	1. Visual inspection. 2. Monitoring heat tracing and maintenance per vendor requirements.	1. Surface. 2. Surface.	1. Site visits/expected weekly activity. 2. Per vendor requirements.	* Failure detected. * High risk assessed by the monitoring technique.	Depends on the severity of the finding during examination; shutdown may be required.	Replacement or repair of insulation/heat tracing. Potential replacement of instrumentation depending on results of inspection.	MI personnel in charge of the surface facility.	Immediate action required to maintain compliance. Pressure must be monitored during injection.
Surface Piping, Instrumentation, and Pressure Control	Surface Piping, Instrumentation, and Pressure Control	Injection Rate Meter	Brittle Fracture	*Insulation/heat tracing to provide cold-weather protection. *Building/structure.	1. Visual inspection. 2. Monitoring heat tracing and maintenance per vendor requirements.	1. Surface. 2. Surface.	1. Site visits/expected weekly activity. 2. Per vendor requirements.	* Failure detected. * High risk assessed by the monitoring technique.	Depends on the severity of the finding during examination; shutdown may be required.	Replacement or repair of insulation/heat tracing. Potential replacement of instrumentation depending on results of inspection.	MI personnel in charge of the surface facility.	Immediate action required to maintain compliance. Rate must be monitored during injection.

Surface Piping, Instrumentation, and Pressure Control	Surface Piping, Instrumentation, and Pressure Control	Injection Temperature Gauge	Brittle Fracture	*Insulation/heat tracing to provide cold-weather protection. *Building/structure.	1. Visual inspection. 2. Monitoring heat tracing and maintenance per vendor requirements.	1. Surface. 2. Surface.	1. Site visits/expected weekly activity. 2. Per vendor requirements.	* Failure detected. * High risk assessed by the monitoring technique.	Depends on the severity of the finding during examination; shutdown may be required.	Replacement or repair of insulation/heat tracing. Potential replacement of instrumentation depending on results of inspection.	MI personnel in charge of the surface facility.	Immediate action required to maintain compliance. Temperature must be monitored during injection.
Surface Piping, Instrumentation, and Pressure Control	Surface Piping, Instrumentation, and Pressure Control	Emergency Shutdown Valve	Brittle Fracture	*Insulation/heat tracing to provide cold-weather protection. *Building/structure.	1. Visual inspection. 2. Monitoring heat tracing and maintenance per vendor requirements.		1. Site visits/expected weekly activity. 2. Per vendor requirements.	* Failure detected. * High risk assessed by the monitoring technique.	Depends on the severity of the finding during examination; shutdown may be required.	Replacement or repair of insulation/heat tracing. Potential replacement of valve depending on results of inspection.	MI personnel in charge of the surface facility.	Immediate action required to maintain compliance. Shutoff capability must be maintained during injection.



Fluid Specifications

1. CO₂ Spec

Stream Description	Compressed CO ₂ Product to Battery Limits
Stream Number	606
Temperature, °F	120
Pressure, psia	1688.7
Components	
Component Flows	Limits
H ₂ O	632 ppmv
CO ₂	99.90%
N ₂	163 ppmv
Ar	4 ppmv
O ₂	6 ppmv
H ₂	0%
SO ₂	<1 ppmv
NO ₂	< 1ppmv
NO	30 ppmv

APPENDIX G

**FINANCIAL ASSURANCE DEMONSTRATION
PLAN**

**Tundra Secure Geologic Storage Site
Financial Assurance Plan
Details of Financial Instruments Provided in Conjunction with Application**

SPECIAL-PURPOSE TRUST

This section describes the selection of a trustee for the Tundra SGS Trust Fund, the Trust Agreement, and the financial strength of the trustee. The trust fund will be established prior to first injection and will be designed to meet the requirements of NDAC § 43-05-01-09.1.

The trust fund will be available for emergency and remedial response upon approval of the Class VI permits and, after injection ceases, for injection well plugging, postinjection site care, and site closure. The trust funds will be available to the Applicant or to a third party if the Applicant were no longer involved with Tundra SGS site operation.

Applicant sent request to three local, regional, and national banks seeking a statement of qualifications for the management of an irrevocable trust to meet Tundra SGS obligations for injection well plugging and postinjection site care and site closure. The Applicant provided the trustee requirements and specifications that prospective trustees must meet and provided the draft Trust Agreement attached hereto as Appendix G-1. Expressions of interest were due to Applicant February 15, 2021.

On March 8, 2021, the Applicant sent a formal Request for Proposal to two banks that had expressed interest in serving as the trustee for the Tundra SGS Trust Fund. Applicant selected Bank of North Dakota (BND) based upon its experience, expertise, and overall approach and responsiveness.

BND provides corporate trust services for the state of North Dakota and its political subdivisions. Services include trustee, escrow agent, paying agent, bond registrar, and transfer agent. BND monitors compliance with financing documents, oversees reporting requirements, invests fund balance, receives and disburses funds, reconciles accounts, and maintains proper records. BND will provide monthly transaction and balance sheet reports, and annual valuations of the account will be completed.

BND has a Compliance Officer who monitors regulations and assists with implementation of new requirements. In addition, Internal Audit staff provide periodic reviews of the Trust Services to ensure adherence to policies and procedures.

Strength of the Trustee

BND maintains a Standard & Poor's long-term A+ and short-term A-1 credit rating. The Trust department currently has over \$2 billion under management.

Trust Agreement

The trust fund will be funded in a phased approach to account for the fact that certain covered activities will not be incurred until shortly before authorization of operation is received. For example, resources to cover the cost of activities like emergency remedial response and

postinjection site care will not need to be covered until closer to when injection begins. The Applicant is providing financial responsibility for the cost of plugging injection wells, postinjection site care, site closure, and emergency and remedial response via a trust fund valued at \$19,824,000.00 and established through the attached Trust Agreement which BND has expressed willingness to accept all recommended terms.

Payment Schedule

The payment schedule for Trust funds commences upon approval of the Class VI permit to operate. Commercial insurance will be bound upon approval of drilling contractor for injection wellbores and is not included in this section.

Initial funding for Trust, in the amount of \$2.12 million, representing potential exposure for emergency and remedial response actions, shall be placed into the Trust upon approval of the Class VI permit to operate.

Subsequent funding of the Trust, in the amount of \$17.704 million, representing obligations for injection well plugging and postinjection site care and site closure, shall be placed into the Trust in equal installments over a period of seven (7) years commencing on the anniversary of the date of first injection.

Pay-In Periods

The following table provides the pay-in periods for the funding of the Trust. Amounts after initial pay-in are subject to annual review and reporting for continuing validation of estimated costs and underlying assumptions.

Funding	Activities	Costs (\$000)	Amount to Be Added Before End of Phase (\$000)
Preinjection (within 7 days of operating permit issuance)	Emergency and Remedial Response	\$5,960	\$2,120
	AOR and Corrective Action	\$0	
Injection (seven (7) equal installments at least 7 days prior to successive anniversaries of operating permit issuance)	Plugging Injection and Monitoring Wells	\$2,025	\$17,704
	Emergency and Remedial Response	\$3,840	
	Postinjection Site Care (includes monitoring)	\$10,285	
	Closure	\$1,554	
Total Fund			\$19,824

COMMERCIAL INSURANCE

This section describes the manner in which the Applicant will select a third-party insurer, develop an insurance estimate, obtain proof of insurance, and confirm the financial strength of the insurer.

The Applicant has procured the services of Marsh McLennan Companies.

The Applicant intends to secure third-party insurance to cover the potential need to undertake emergency and remedial response actions to protect USDWs in the AOR. Although the Applicant has been able to obtain information about the possible terms, conditions, and cost of such a policy, the Applicant has not yet applied for such a policy. This section and accompanying market assessment describe the type of coverage that the Applicant expects to obtain from a third-party insurer, including protective conditions of coverage (cancellation, renewal, and continuation provisions). Additional information about deductions, exceptions, and the premium to be paid is also provided in the attached Appendix G-2 Market Assessment.

Coverage Limits

The greatest exposure would be an acute upward migration through the CO₂ injection well, which would have an estimated cost of \$16,560,000.00 for emergency and remedial response actions, and such coverage would be an amount sufficient to cover the amounts identified in the endangerment of USDWs. The coverage limit will not be lower than the estimated amount to be covered by Commercial Insurance, \$10,600,000.00, as found in Section 4.0, Table 4-14, and may be acquired at a higher limit based upon assessment of available insurance products and market capacity.

Premium

These are only estimates; the premium will be determined based on information provided to the underwriter prior to a cost quotation.

Proof of Insurance

Proof of insurance will be provided when the insurance policy is obtained, prior to first injection.

Financial Strength of Insurer

The financial strength of the insurer will be an important component of the Applicant's selection of an insurer. Information regarding the insurer's financial strength will be provided to the Commission when the insurer is selected.

APPENDIX G-1
STANDBY TRUST AGREEMENT

APPENDIX G-1
STANDBY TRUST AGREEMENT

THIS TRUST AGREEMENT (the “Agreement”) is entered into as of _____ by and between Minnkota Power Cooperative, Inc. (MPC), owner or operator, a corporation (the “Grantor”), and Bank of North Dakota (the “Trustee”), a bank duly organized and existing under the laws of the State of North Dakota.

WHEREAS, the North Dakota Industrial Commission (Commission), an agency of the State of North Dakota, has established authority to administer certain regulations pursuant to the US Environmental Protection Agency’s Class VI Underground Injection Control Program (UIC). The Commission’s regulations, applicable to the Grantor, require that an owner or operator of an injection well shall provide assurance that funds will be available when needed for corrective actions, injection well plugging, post-injection site care and site closure, and emergency and remedial response during the operation of carbon dioxide (CO₂) geologic sequestration injection wells;

WHEREAS, the Grantor has elected to establish a trust to provide all or part of such financial assurance for the facility or facilities identified herein, and;

WHEREAS, the Grantor, acting through its duly authorized officers, has selected the Trustee to be the trustee under this Agreement, and the Trustee is willing to act as trustee.

NOW THEREFORE, the Grantor and the Trustee agree as follows:

Section 1. Definitions. As used in this Agreement:

- A. The term “Grantor” means the owner or operator who enters into this Agreement and any successors or assigns of the Grantor.
- B. The term “Trustee” means the Trustee who enters into this Agreement and any successor Trustee.
- C. Facility or activity means any “underground injection well” or any other facility or activity that is subject to regulation under the Underground Injection Control Program.
- D. “Commission” means the North Dakota Industrial Commission or an authorized representative.
- E. “ERR” means emergency and remedial response plan, associated cost estimate and the funded trust property and income apportioned to cover these costs.

Section 2. Identification of Facilities and Cost Estimates. This Agreement pertains to the facilities and cost estimates identified on attached Schedule A.

Section 3. Establishment of Fund. The Grantor and the Trustee hereby establish a CO₂ Storage Trust Fund (the “Fund”) to satisfy the financial responsibility demonstration and storage facility fees under the Class VI Underground Injection Control (“UIC”) regulations (N.D.A.C. § 43-05-01-09.1 and N.D.A.C. § 43-05-01-17). This Fund shall remain dormant until funded with the proceeds listed on Schedule C. The Trustee shall have no duties or responsibilities beyond safekeeping this Agreement. Upon funding, this Fund shall become active and be administered

pursuant to the terms of this instrument. The Grantor and the Trustee acknowledge that the purpose of the Fund is to fulfill the Grantor's corrective action, injection well plugging, post-injection site care, site closure, emergency and remedial response, and storage facility fee obligations described at N.D.A.C. § 43-05-01-05.1 (Area of review and corrective action), N.D.A.C. § 43-05-01-11.5 (Injection well plugging), N.D.A.C. § 43-05-01-19 (Post-injection site care and site closure), N.D.A.C. § 43-05-01-13 (Emergency and remedial response), and N.D.A.C. § 43-05-01-17 (Storage Facility Fees) respectively. All expenditures from the Fund shall be to fulfill the legal obligations of the Grantor under such regulations, and not any obligation of the Commission or any other state agency. The Grantor and the Trustee intend that no third party have access to the Fund except as herein provided. The Fund is established initially as consisting of the property, which is acceptable to the Trustee, described in Schedule B attached hereto. Such property and any other property subsequently transferred to the Trustee is referred to as the Fund, together with all earnings and profits thereon, less any payments or distributions made by the Trustee pursuant to this Agreement. The Fund shall be held by the Trustee, IN TRUST, as hereinafter provided. The Trustee shall not be responsible, nor shall it undertake any responsibility, for the amount or adequacy of any additional payments necessary to discharge any liabilities of the Grantor established by the Commission.

Section 4. Payment for Corrective Action, Injection Well Plugging, Post-Injection Site Care and Site Closure, and Emergency and Remedial Response. The Trustee shall make payments from the Fund only as the Commission shall direct, in writing, to provide for the payment of the costs of corrective action, injection well plugging, post-injection site care and site closure, and emergency and remedial response of the injection wells covered by this Agreement. The Trustee shall use the Fund to direct-pay or reimburse the Grantor, other persons selected by the Grantor to perform work, or as otherwise directed by the Commission when the Commission advises in writing that the work will be or was necessary for the fulfillment of the Grantor's corrective action, injection well plugging, post-injection site care and site closure, or emergency and remedial response obligations described in N.D.A.C. §§ 43-05-01-05.1, 43-05-01-11.5, 43-05-01-19 and 43-05-01-13, respectively. All expenditures from the Fund shall be to fulfill the legal obligations of the Grantor under such regulations, and not any obligation of the Commission, as the Commission is not a beneficiary of the Trust. The Commission may advise the Trustee that amounts in the Fund are no longer necessary to fulfill the Grantor's obligations under N.D.A.C. § 43-05-01-09.1 and that the Trustee may refund all or a portion of the remaining funds to the Grantor. Upon refund, such funds shall no longer constitute part of the Fund as defined herein.

Section 5. Payments Comprising the Fund. Payments made to the Trustee for the Fund shall consist of cash or securities acceptable to the Trustee. Schedule C provides the amounts and timing of the seven (7) payments (i.e., the pay-in schedule).

Section 6. Trustee Management and Investment. Trustee shall manage, invest, and reinvest all of the Trust assets, made up of the principal and income of the Fund, in accordance with the North Dakota Prudent Investor Standards, Chapter 59-17, *et seq.* of the North Dakota Century Code, as amended ("Act"). The Trustee shall invest and reinvest the principal and income, without distinction, according to the investment instructions included within the attached Exhibit B (referred to as "Permitted Investments"), *provided* the Permitted Investments may be revised at any time upon notice from the Grantor. To the extent not inconsistent with the Act and Permitted

Investments, Trustee shall hold the Fund assets thereon subject to the terms and conditions of this Agreement and is empowered and directed to invest and reinvest the Fund assets and any accumulated income in such certificates of deposit, obligations to the United States of America, demand deposits, commercial paper or other securities or accounts as the Grantor shall direct. In the absence of instructions from the Grantor, Trustee shall invest and reinvest the Fund assets in money market funds available upon demand or short notice. All interest earned on the Fund principal shall become part of the Fund assets. Notwithstanding the foregoing, none of the Fund assets may be held in any investment that cannot be sold, redeemed or otherwise liquidated at the holders' option in ninety (90) days or less without loss of interest or discount. All amounts and investments (other than bearer instruments) comprising the Fund assets shall be registered and held in the name of the Trustee.

Section 7. Express Powers of Trustee. Without in any way limiting the powers and discretions conferred upon the Trustee by the other provisions of this Agreement or by law, the Trustee is expressly authorized and empowered:

- A. To sell, exchange, convey, transfer, or otherwise dispose of any property held by it, by public or private sale. No person dealing with the Trustee shall be bound to see to the application of the purchase money or to inquire into the validity or expediency of any such sale or other disposition;
- B. To make, execute, acknowledge, and deliver any and all documents of transfer and conveyance and any and all other instruments that may be necessary or appropriate to carry out the powers herein granted;
- C. To register any securities held in the Fund in its own name or in the name of a nominee and to hold any security in bearer form or in book entry, or to combine certificates representing such securities with certificates of the same issue held by the Trustee in other fiduciary capacities, or to deposit or arrange for the deposit of such securities in a qualified central depository even though, when so deposited, such securities may be merged and held in bulk in the name of the nominee of such depository with other securities deposited therein by another person, or to deposit or arrange for the deposit of any securities issued by the United States Government, or any agency or instrumentality thereof, with a Federal Reserve bank, but the books and records of the Trustee shall at all times show that all such securities are part of the Fund;
- D. To deposit any cash in the Fund in interest-bearing accounts maintained or savings certificates issued by the Trustee, in its separate corporate capacity, or in any other banking institution affiliated with the Trustee, to the extent insured by an agency of the Federal or State government; and,
- E. To compromise or otherwise adjust all claims in favor of or against the Fund, including claims in favor of the Trust as a loss payee under applicable insurance policies.

Section 8. Taxes and Expenses. All taxes of any kind that may be assessed or levied against or in respect of the Fund and all brokerage commissions incurred by the Fund shall be paid from the Fund. All other expenses incurred by the Trustee in connection with the administration of this Trust, including fees for legal services rendered to the Trustee, the compensation of the Trustee to the extent not paid directly by the Grantor, and all other charges and disbursements of the Trustee permitted under this Agreement shall be paid from the Fund.

Section 9. Annual Valuation. The Trustee shall annually, at least 30 days prior to the anniversary date of establishment of the Fund, furnish to the Grantor and to the Commission a statement confirming the value of the Fund. Any securities in the Fund shall be valued at market value as of no more than 60 days prior to the anniversary date of establishment of the Fund.

Section 10. Advice of Counsel. The Trustee may from time to time consult with counsel, who may be counsel to the Grantor, with respect to any question arising as to the construction of this Agreement or any action to be taken hereunder. The Trustee shall be fully protected, to the extent permitted by law, in acting upon the advice of counsel.

Section 11. Trustee Compensation. Trustee shall be entitled to reasonable compensation for its services provided hereunder in accordance with the Trustee's fee schedule as in effect during the course of this Agreement, *provided* that any change or revision to the fee schedule shall be effective only upon Trustee providing Grantor with thirty (30) days written notice, or another mutually agreed to period of time, which notice shall include effective date(s) of any change or revision. Trustee's current fee schedule is attached as Exhibit C, with such fees identified therein being each and together "Trustee Fees." Additionally, Trustee shall be reimbursed for all expenses reasonably incurred by Trustee in connection with the performance of its duties and enforcement of its rights hereunder and otherwise in connection with the preparation, operation, administration and enforcement of this Agreement, including, without limitation, attorneys' fees, brokerage costs and related expenses incurred by Trustee ("Trustee Expenses"). Grantor shall pay the Trustee Fees and Trust Expenses within thirty (30) days following receipt of an invoice from Trustee.

Section 12. Successor Trustee. The Trustee may resign or the Grantor may replace the Trustee, but such resignation or replacement shall not be effective until the Grantor has appointed a successor trustee and this successor accepts the appointment, and the Commission consents to the appointment. The successor trustee shall have the same powers and duties as those conferred upon the Trustee hereunder. Upon the successor trustee's acceptance and receipt of Commission consent of the appointment, the Trustee shall assign, transfer, and pay over to the successor trustee the funds and properties then constituting the Fund. If for any reason the Grantor cannot or does not act in the event of the resignation of the Trustee, the Trustee may apply to a court of competent jurisdiction for the appointment of a successor trustee or for instructions. The successor trustee shall specify the date on which it assumes administration of the trust in a writing sent to the Grantor, the Commission, and the present Trustee by certified mail ten (10) days before such change becomes effective. Any expenses incurred by the Trustee as a result of any of the acts contemplated by this Section shall be paid as provided in Section 9.

Section 13. Instructions to the Trustee. All orders, requests, and instructions by the Grantor to the Trustee shall be in writing, signed by such persons as are designated in the attached Exhibit A or such other designees as the Grantor may designate by amendment to Exhibit A. The Trustee shall be fully protected in acting without inquiry in accordance with the Grantor's orders, requests, and instructions. All orders, requests, and instructions by the Commission to the Trustee shall be in writing, signed by the Commission or its duly constituted delegate(s), and the Trustee may rely on these instructions to the extent permissible by law. The Trustee shall have the right to assume, in the absence of written notice to the contrary, that no event constituting a change or a termination of the authority of any person to act on behalf of the Grantor or Commission hereunder has

occurred. The Trustee shall have no duty to act in the absence of such orders, requests, and instructions from the Grantor and/or the Commission, except as provided for herein.

Section 14. Notice of Nonpayment. The Trustee shall notify the Grantor and the Commission, by certified mail within ten (10) days following the expiration of the 30-day period after the anniversary of the establishment of the Trust, if no payment is received from the Grantor during that period.

Section 15. Amendment of Agreement. This Agreement may be amended by an instrument in writing executed by the Grantor and the Trustee, with the concurrence of the Commission, or by the Trustee and the Commission if the Grantor ceases to exist. Provided, however, that the Commission may not be named as a beneficiary of the Trust, receive funds from the Trust, or direct that Trust funds be paid to a particular entity selected by the Commission.

Section 16. Cancellation, Irrevocability and Termination. Subject to the right of the parties to amend this Agreement as provided in Section 16, this Trust shall be irrevocable and shall continue until terminated at the written agreement of the Grantor and the Trustee, with the concurrence of the Commission, or by the Trustee and the Commission if the Grantor ceases to exist. Upon termination of the Trust, all remaining Fund property, less final trust administration expenses, and excluding the principal and income contained in the ERR fund account, shall be delivered to the Grantor, or if the Grantor is no longer in existence, at the written direction of the Commission. At termination of the Trust or upon early written direction by the Grantor, with concurrence of the Commission, Trustee must distribute ERR principal in an amount calculated in accordance with N.D.A.C. § 43-05-01-17 plus a pro rata portion of the income accrued. Following the distribution of the ERR principal and income in accordance with the foregoing clause, any remaining Fund property shall be delivered to the Grantor, or if the Grantor is no longer in existence, at the written direction of the Commission.

Section 17. Immunity and Indemnification. The Trustee shall not incur personal liability of any nature in connection with any act or omission, made in good faith, in the administration of this Trust, or in carrying out any directions by the Grantor issued in accordance with this Agreement. The Trustee shall be indemnified and saved harmless by the Grantor or from the Fund, or both, from and against any personal liability to which the Trustee may be subjected by reason of any act or conduct in its official capacity, including all expenses reasonably incurred in its defense in the event the Grantor fails to provide such defense. The Commission does not indemnify either the Grantor or the Trustee. Rather, any claims against the Commission are subject to Chapter 32-12.2, *et seq.*

Section 18. Choice of Law. This Agreement shall be administered, construed, and enforced according to the laws of the State of North Dakota with regard to claims by the Grantor or Trustee. Claims involving the Commission are subject to North Dakota State law.

Section 19. Interpretation. As used in this Agreement, words in the singular include the plural and words in the plural include the singular. The descriptive headings for each Section of this Agreement shall not affect the interpretation or the legal efficacy of this Agreement.

{Signature Page to Follow}

IN WITNESS WHEREOF the parties below have caused this Agreement to be executed by their respective representatives duly authorized and their seals to be hereunto affixed and attested as of the date first above written.

Signature of Grantor's Authorized Representative: _____

Name of Grantor's Authorized Representative: _____

Title: _____

Attest:

Signature: _____

Name of Attester: _____

Title of Attester: _____

Certification of Acknowledgement of Notary:

Signature of Trustee's Authorized Representative: _____

Name of Trustee's Authorized Representative: _____

Title: _____

Attest:

Signature: _____

Name of Attester: _____

Title of Attester: _____

Certification of Acknowledgement of Notary:

Schedule A: Facilities and Cost Estimates to which the Trust Agreement Applies

Because the three injection wells covered by this Agreement will be similarly constructed and drilled from a single well pad and under a combined project plan, the CO₂ injected through the three wells will form one co-mingled and overlapping, stacked CO₂ plume in a contractual and legal context. Therefore, funds noted in the table below apply to all three injection wells as one integrated facility.

Facility	Corrective Action (\$)	Injection Well Plugging (\$)	Post-injection Site Care (\$)	Site Closure (\$)	Emergency and Remedial Response (\$)
Unity-2 (BC-2)	\$0.00	\$2,025,000.00	\$10,285,000.00	\$1,554,000.00	\$5,960,000.00
Liberty-1 (BC-1)					
McCall-3 (DW-1)					
NRDT(Monitoring Well)					

Schedule B: Trust Fund Property

Because the three injection wells covered by this Agreement will be similarly constructed and drilled from a single well pad and under a combined project plan, the CO₂ injected through the three wells will form one co-mingled and overlapping, stacked CO₂ plume in a contractual and legal context. Therefore, funds noted in the table below apply to all three injection wells as one integrated facility.

Facility	Funding Value for Activities
Unity-2 (BC-2)	\$19,824,000.00
Liberty-1 (BC-1)	
McCall-3 (DW-1)	
NRDT(Monitoring Well)	

Schedule C: Pay-in Periods/Schedule

The Fund will be funded according to when the financial risks are incurred in three (3) distinct Periods of activity.

- **Pre-Injection:** Upon authorization from the Commission to begin injecting CO₂ under the Class VI well permit(s), Grantor must be prepared to undertake any emergency or remedial response (ERR) actions, although such actions are unlikely to be needed. Further, in accordance with N.D.C.C. § 43-05-01-17 Grantor must account for a one cent fee on each metric ton of carbon dioxide for administration of a storage facility fund and a fee of seven cents on each ton of carbon dioxide injected for a storage facility fund which can be utilized for post closure period activities (together referred to as “Commission Fee”). The average projected amount of carbon dioxide injected will be 4MM metric tons annually. The Grantor estimates a minimum of 12 years of operation and is permitting operation of the storage facility for 20 years of injection. Grantor’s estimated total cost of ERR activities is \$16,560,000.00 assuming conditions allowing a conservative outer-limit cost estimate (at least 10 years of operation) with \$5,960,000.00 of the estimate funded by the trust. Grantor shall initially fund an amount equal to the net of the cost estimate for ERR activities less the calculated 12 year Commission Fee based upon the projected annual average injection rate of 4MM metric tons, \$2,120,000.00. The initial funding payment in the amount of \$2,120,000.00 will fund the Fund account in the Pre-Injection Period with the remaining equal installments made in the Injection Period, as further discussed below.

- **Injection:**
 - Once an injection or monitoring well is drilled, plugging costs will need to be incurred prior to cessation of injection operations. Therefore, the trust account will need to account for the cost of plugging injection and monitoring wells prior to the Post-Injection period. Grantor’s estimated cost of this plugging activity is \$2,025,000.00. The total plugging cost will be paid across the seven (7) equal annual funding installments made in the Injection Period, each installment consisting of \$289,285.71 for plugging expenses with the first installment prior to the one-year anniversary of authorization to operate a Class VI injection well and the remaining installments to be made individually on the successive anniversary until fully funding the principal amount of \$2,025,000.00.

 - Also, Grantor will fully fund the ERR Fund account making seven (7) equal annual installments of \$548,572.00 made in the Injection Period, with the first installment prior to the one-year anniversary Commission’s issuance of authorization to operate a Class VI injection well and the remaining installments to be made individually on the successive anniversary until fully funding the principal amount of \$5,960,000.00. However, if at any time the Commission determines the actual amount of the Commission Fee as calculated under N.D.C.C. 43-05-01-17 exceeds the principal amount then contained in the ERR account, then upon written direction from the Commission, Grantor shall fund amounts to bring the principal and income to an amount sufficient cover the Commission Fee.

- Grantor will fund the Fund account for post-injection site care, monitoring and site closure making seven (7) equal annual installments of \$1,691,286.00. Grantor's estimated cost of post-injection site care and monitoring is \$10,285,00.00 and site closure activities is \$1,554,000.00. The first installment to be made in the Injection period prior to the one-year anniversary of the Commission's issuance of authorization to operate a Class VI injection well and the remaining installments to be made individually on the successive anniversary until fully funding the principal amount of \$11,839,000.00.
- The seven (7) installments are to be made individually prior to the successive anniversary of the Commission's issuance of authorization to operate a Class VI injection well until fully funding the principal amount of \$19,824,000.00.
- **Post-Injection and Closure:** All costs associated with post-injection and closure activities must be funded before or at the start of the post-injection phase. However, the Fund may phase out these costs as associated Pre-Injection and Injection Period activities are completed (with approval from the Commission). For example, once wells have been plugged, their corresponding plugging costs may be subtracted from the total value of the Fund account.

Pay-in Schedule

Within seven (7) calendar days after the issuance of final Class VI authorization to operate for the three injection wells, Grantor will ensure that \$2,120,000.00 is in the Fund to cover the cost of Injection Period activities (Emergency and Remedial Response Plan). The total value of the trust at the beginning of the Injection Period will be \$2,120,000.00.

On or before the seven-year anniversary of the issuance of the final Class VI permit to operate for the three injection wells, Grantor will ensure that an additional \$17,704,000.00 is in the Fund to cover the remaining costs of the Pre-Injection, Injection, Post-Injection, and Closure Periods. An additional \$2,529,143.00 will be added on or before the one-year anniversary of the issuance of the final Class VI permit to operate for the three injection wells. An additional \$2,529,143.00 will be added on or before the two-year anniversary of the issuance of the final Class VI permit to operate for the three injection wells. An additional \$2,529,143.00 will be added on or before the three-year anniversary of the issuance of the final Class VI permit to operate for the three injection wells. An additional \$2,529,143.00 will be added on or before the four-year anniversary of the issuance of the final Class VI permit to operate for the three injection wells. An additional \$2,529,143.00 will be added on or before the five-year anniversary of the issuance of the final Class VI permit to operate for the three injection wells. An additional \$2,529,143.00 will be added on or before the six-year anniversary of the issuance of the final Class VI permit to operate for the three injection wells. A final installment of \$2,529,142.00 will be added on or before the seven-year anniversary for the permit to operate for the three injection wells, completing the phase-in of financial responsibility payments for the Pre-Injection, Post-Injection, and Closure Periods. Grantor may also elect to substitute another mechanism to demonstrate financial responsibility for emergency and remedial response for the injection and post-injection phases. If Commission approves such a substitution, this Agreement will be amended accordingly.

These amounts are based on the third-party cost estimate submitted by Grantor in its *Supporting Documentation: Underground Injection Control Class VI Injection Well Permit Applications for Tundra SGS _____ Wells , , and ,* dated _____ (Appendix _) and on the

Commission’s independent evaluation of the cost estimates. These costs are subject to review and approval by the Commission and may be adjusted for inflation or any change to the cost estimate in accordance with N.D.C.C. § 43-05-01-09.1.

Table 1 shows the activities and estimated costs according to when the payments would be required (i.e., at the start of the “Pre-Injection”) phase or at the start of the “Injection and Post-Injection Phase”).

Table 1: Trust Funding Schedule

Funding Phase	Activities	Total Activities’ Costs Prior to Funding Phase (\$000)	Amount to be Added Before End of Phase (\$000)
Pre-Injection (within 7 days of operating permit issuance)	Emergency and Remedial Response	\$5,960	\$2,120
	AoR and Corrective Action	\$0	
Injection (seven (7) equal installments prior to successive anniversaries of operating permit issuance)	Plugging Injection and Monitoring Wells	\$2,025	\$17,704
	Emergency and Remedial Response	\$3,840	
	Post-Injection Site Care (Includes Monitoring)	\$10,285	
	Closure	\$1,554	
Total Fund			\$19,824

Exhibit A: [Grantor] Designee Authorized to Instruct Trustee

[Name]

[Title]

[Grantor name or company if different]

[Address 1]

[Address 2]

[Phone]

[Grantor], as Grantor, may designate other designees by amendment to this Exhibit.

Exhibit B

Permitted Investments

- (i) Direct obligations of the United States of America or any agency or instrumentality thereof or obligations backed by the full faith and credit of the United States of America maturing in twelve (12) months or less from the date of acquisition:
- (ii) Commercial paper maturing in 180 days or less rated not lower than A-1, by Standard & Poor's or P-1 by Moody's Investors Service, Inc. on the date of acquisition.
- (iii) Demand deposits, time deposits or certificates of deposit maturing within one year in commercial banks whose obligations are rated A-1, A or the equivalent or better by Standard & Poor's on the date of acquisition;
- (iv) Money market or mutual funds whose investments are limited to those types of investments described in clauses (i) and (iii) above; and
- (v) Deposits of the Bank of North Dakota, to the extent guaranteed by the State of North Dakota under North Dakota Century Code Section 6-09-10, or a successor statute.

Exhibit C

Compensation and Reimbursement of Expenses
Trustees Fee Schedule

Outlined below are the initial and ongoing fees for the Bank of North Dakota to provide Trustee services:

One Time Initial Fee:	\$1,250.00
Annual fee for Administration:	\$1,250.00
Legal Review of Documents:	\$400 - \$600 estimated

Contact: Carrie Willits
(701) 328-5612
cwillits@nd.gov

The Annual Fee for Administration is subject to change upon a 30 day notification.

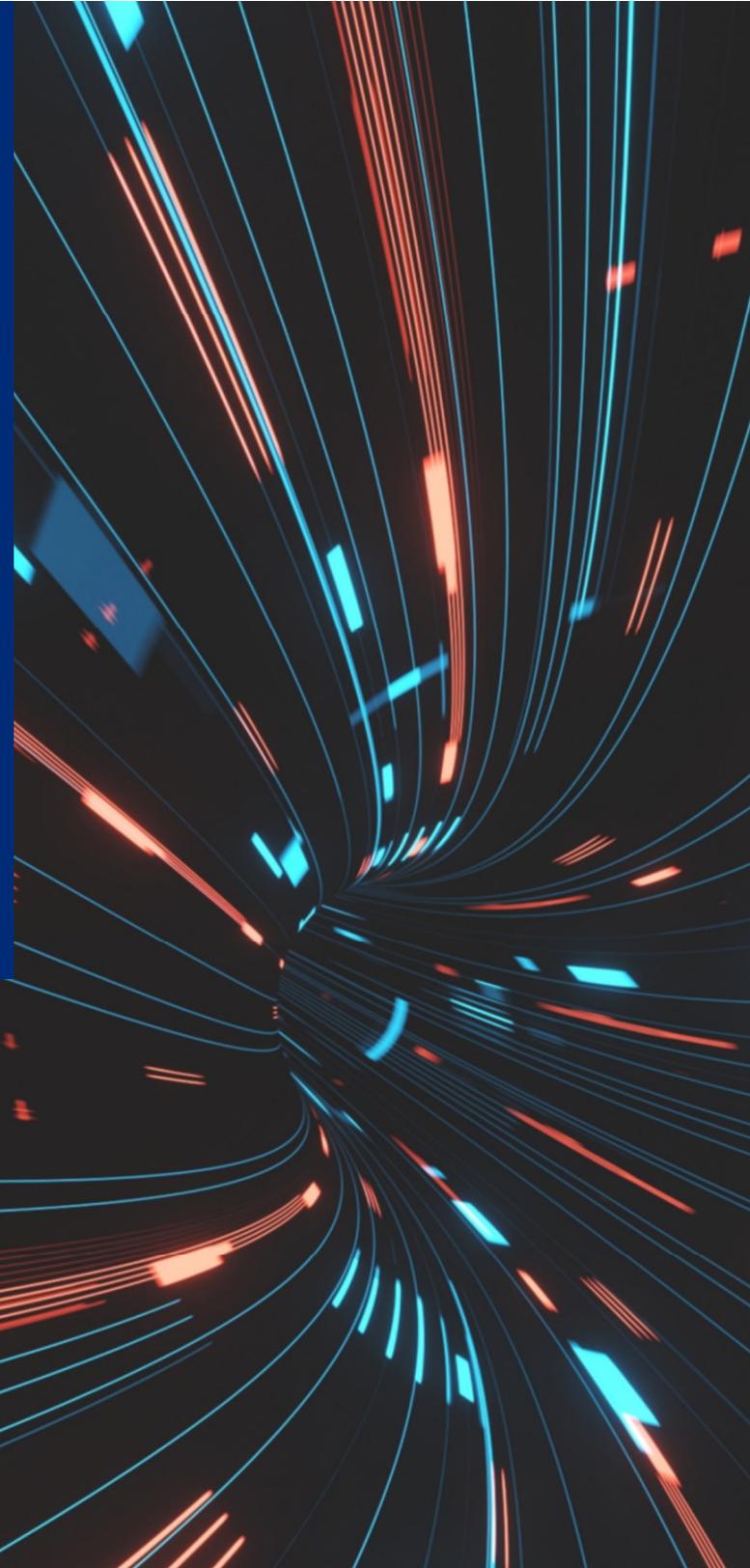
APPENDIX G-2
MARKET ASSESSMENT



Project Tundra

Use of Insurance in the FADP

May 26, 2021



Contents

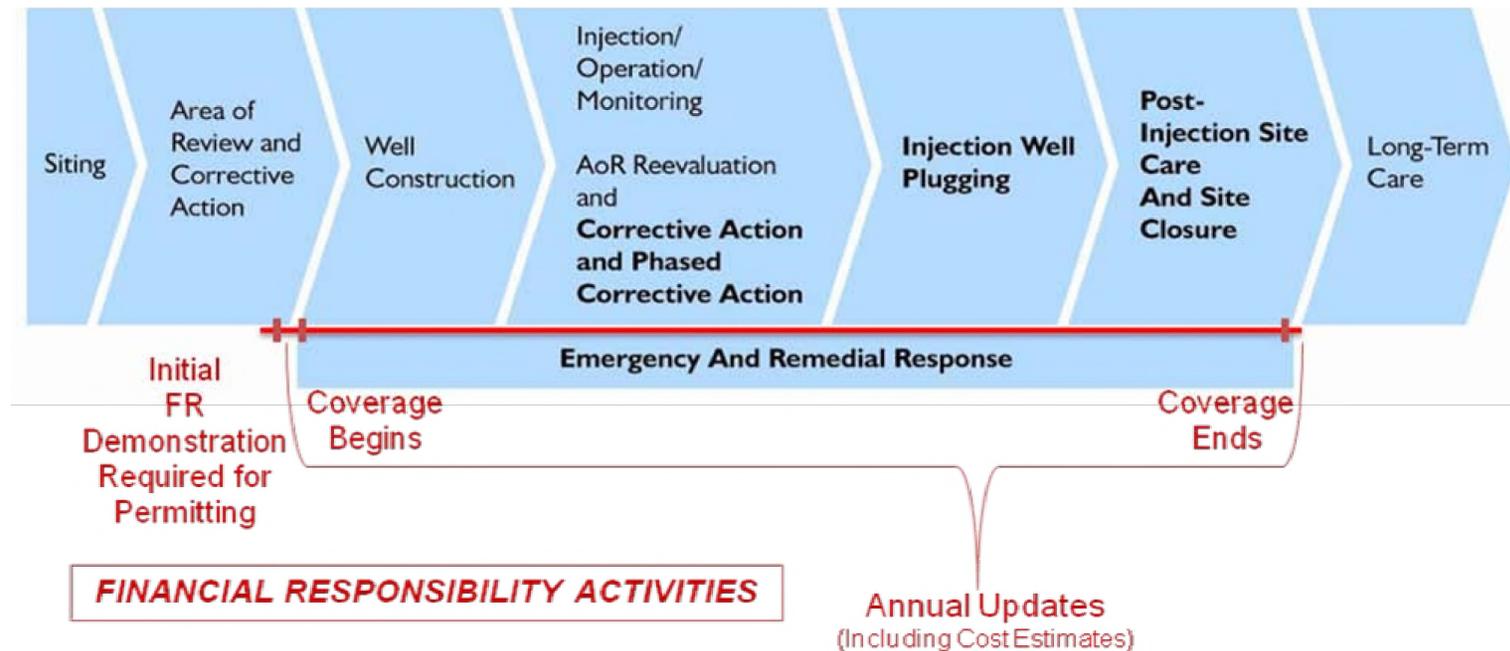
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Section One

Executive Summary

This document will examine pollution liability insurance options over the course of the operating lifetime of the CO₂ sequestration company, “Tundra SGS”, including the 10 year, post-injection site care period prior to transfer of liability to the State of North Dakota. The following graphic is a helpful summary.



The market review was requested to outline the applicable environmental insurance products, expected policy terms and conditions, exclusions, costs and deductibles to support applicant to the North Dakota Industrial Commission for necessary UIC Class VI well injection permit financial responsibility requirements. The examination extends only to Contractors Pollution Liability, Pollution Liability and Operators Extra Expense/Control of Well insurances based on the Emergency and Remedial Response activities for the Tundra SGS geologic sequestration project, which could respond following a liability claim arising from contamination of an Underground Source of Drinking Water (USDW). First party/property insurances as well as the extended family of 3rd party liability insurance such as (but not limited to): general liability, auto liability, employer’s liability, cyber liability, professional liability and all measure of executive liability coverages, while generally critical to the greater project

and highly recommended, are not under consideration in this analysis. All coverage descriptions, options and estimates provided herein are non-binding estimates based on whatever project data has been provided at this point. Over the 20+ year of life of the project (not to mention the next few months) these estimates will change, as such no guarantee is possible as to the future fitness of the program details provided in this report.

Marsh & McLennan Companies Introduction

[Marsh & McLennan Companies](#) (MMC) is the leading global professional services firm in the areas of risk, strategy and people. With annual revenue approaching USD17 billion and 76,000 colleagues worldwide, MMC helps clients navigate an increasingly dynamic and complex environment through four market-leading businesses: [Marsh](#), [Guy Carpenter](#), [Mercer](#), and [Oliver Wyman](#).

We are four companies, with one purpose: helping our clients to meet the challenges of our time.



About Marsh

Marsh is the world's leading insurance broker and risk adviser. With over 35,000 colleagues operating in more than 130 countries, Marsh serves commercial and individual clients with data driven risk solutions and advisory services.

Power Industry Expertise

With more than 270 utility clients in the United States, the Marsh Power and Utilities team remains at the forefront of helping utilities manage the many risks they face. We placed over \$1 billion of insurance premium on behalf of our utility clients into the global insurance market. We are recognized as the leading broker in the power and utility industry sector, and have deep relationships with all the major insurers actively underwriting power and utilities business, including AEGIS, EIM, AIG, ANI, Everest, Liberty International, and FM Global. We have extensive knowledge and deliver results for clients owning all forms of power generation, including natural gas, coal, nuclear, hydro, biomass, geothermal, wind, solar, and energy storage.

Contact

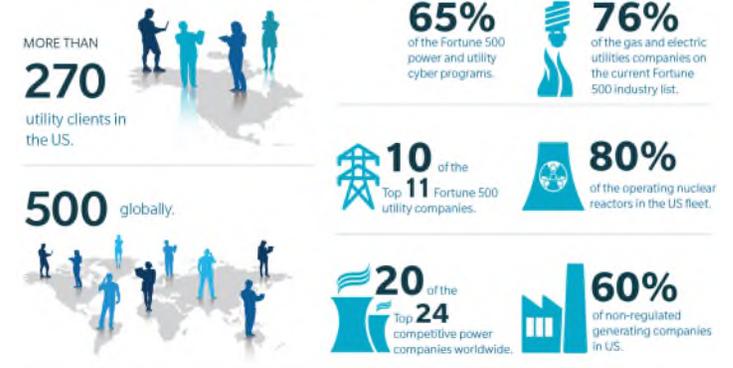
Gavin Hurd, Managing Director, Energy & Power

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MARSH'S US POWER & UTILITY PRACTICE



Section Two

Coverage Assessment by Project Phase

This section outlines the certain types of insurance which may respond to a pollution event during certain phases of the project life.

Project Phase	General Risks Associated	Types of Insurance	Assumptions/Questions
Construction phase pollution event	<ol style="list-style-type: none"> 1. Pollution event during construction 2. Well control event during drilling or completion 	<ol style="list-style-type: none"> 1. Contractors Pollution Liability (CPL) for Contractor. Separate CPL policy for Owner interest. 2. Operators Extra Expense (OEE) for either owner or contractor as assigned in the drilling contract 	<ol style="list-style-type: none"> 1. CPL required by contract with contractor. Owners CPL operates as a difference in limits/difference in conditions to contractors policy 2. Party responsible to provide OEE is established by contract
Operations phase pollution event	<ol style="list-style-type: none"> 1. Pollution during operations 2. Well control event during operations 	<ol style="list-style-type: none"> 1. Pollution Liability (PL) Coverage for owner 2. Operators Extra Expense (OEE) for owner or operator 	<ol style="list-style-type: none"> 1. Multi-year policy could be desirable. Combined GL/PL may also be available 2. Responsibility to carry OEE can be transferred to the contract operator and can include operator of record via Contract Operator Endorsement.
Injection Well Plugging phase pollution event	Well control event during plugging	OEE for either owner or contractor as per contract	<p>Party responsible to provide OEE is established by contract.</p> <p>Owner's operating pollution liability coverage remains in force until Tundra SGS operations are discontinued</p>
Post Injection Site Care pollution event	Gradual migration of CO ₂ into USDWs	Pollution Liability	Following injection well plugging, pollution policies adjusted to maximum terms and renewed as necessary until liabilities assumed by State of North Dakota

Section Three

Contractors Pollution Liability Coverage Details

Summary

Contractors Pollution Liability (CPL) covers third party damages for bodily, injury property damage or cleanup related to pollution events which occur during construction operations. Unlike other pollution coverage, CPL does not have reporting windows for discovery or reporting of an occurrence. The following coverage sections can be included in a CPL policy:

- Coverage A: Contractors Pollution Liability
- Coverage B: Pollution Liability during Transportation
- Coverage C: Non-Owned Site Pollution Liability
- Coverage D: Time-Element Pollution Liability
- Coverage E: Image Restoration Expenses
- Coverage F: Disinfection Event Expenses
- Coverage G: Pre-Claim Event Expenses

Refer to Specimen Policy Form in Appendix A

Coverage terms and conditions are governed by the complete terms and conditions of the policy, including restrictions and exclusions. Defense is included within the limit of liability, with possibility for additional defense outside. Limits are structured as per incident and aggregate and are elected at time of binding.

Pollution Liability (PL) policies (discussed in the following section) prefer not to extend coverage to construction operations, including those events occurring during the operations period but arising directly from construction. Accordingly, in order to keep PL market selection as broad as possible, we recommend a separate CPL to cover construction operations.

Status of Market

The market for CPL is stable and very competitive. Viable markets include Ironshore, Aspen, Ascot, Enviant, Hamilton, and Markel.

Review of Coverage

Coverage Limits

Benchmarking reveals an average Contractors Pollution Liability purchase of \$20M for multi-year policies. Drilling contractors often carry lower than average CPL limits due to the historical experience of pollution events at contractor risk which occur during drilling operations, the rural location of their work and general reliance on the pollution coverage grants within other policies which can cover sudden and accidental pollution events. Selection of CPL limits is often driven by broader contract negotiations as well as the aggregate nature of the limit provided over the term of the construction period and completed operations period.

CPL coverage can be structured in many ways, as owner or contractor controlled for the project, owner's or contractor's interest separately or in a combination. The owner's basic objective should be to cover a target limit for pollution events arising from construction activities both during the actual construction and completed operations coverage for 10-years following construction. The simplest approach would be to require the contractor via the construction contract to carry the entire desired limit. While most contractors already carry CPL, the limit may not be large enough and is usually shared across the contractor's entire portfolio of projects. Given smaller usual limits and the shared aggregate, requiring the contractor to cover the entire desired limit can restrict contractor selection and distort available bids.

For this project we recommend that part of the desired CPL limit be stipulated by contract as a Contractor required insurance, along with others such as General Liability, Auto Liability, Excess, etc. All contractors and subcontractors engaged to perform work at the site should carry the required CPL. We further recommend the owner carry the balance of the desired limit in a CPL Owner's Interest policy to protect against contractor CPL policy deficiencies and termination of coverage or exhaustion of limit over the completed operations period. The owner's CPL policy would operate as Difference in Conditions/Difference in Limit to the Contractors so would only be accessed in the event the limit was exhausted or not maintained in accordance with the contract requirements. We recommend that both CPL and CPL Owner's interest policies be purchased during the construction period. For the contractor's CPL, a project specific policy is recommended, but not required in this case as the Owner's CPL can supplement. If contractor needs more flexible terms (such as lower limit and not project specific), the owner's CPL can be adjusted to make up the balance of the target pollution policy limit.

Market capacity for CPL is estimated at \$500M.

Deductible

Standard deductibles vary from \$25,000 to \$100,000 for Owner's Interest CPL policies

Exclusions

Exclusions – Refer to Specimen Policy Form in Appendix A

Some of the basic exclusions in a pollution legal liability policy are outlined below, however please note that this is not a complete listing of all exclusions or restrictions contained within the policy.

Applicable to All Insuring Agreements, Except as Indicated

-
- | | |
|--|---|
| <ul style="list-style-type: none"> • Criminal Fines, Penalties, and Assessments • Contractual Liability – except where noted in agreement • Prior Waste Disposal Activities • Intentional Noncompliance • Internal Expenses • Insured vs. Insured • Asbestos and Lead • Employer Liability • Prior Knowledge/Non-Disclosure | <ul style="list-style-type: none"> • Identified Underground Storage Tank (unless scheduled) • Closure/Post Closure and Reclamation Costs • Drilling and Specialty Equipment • Divested Property • Damage to Insured's Products and Work • Insured's Professional Services • Products Liability • Property Damage to Conveyances • Costs to Cleanup Pits or Ponds |
|--|---|
-

Renewal

The policies would not renew. The recommended Contractor's CPL and owner's interest CPL would both run the course of construction and carry a 10 year completed operations extension.

Cancellation

Policy cancellation as per Section IV. Conditions clause 3. Cancellation on page 11 of the sample wording in Appendix A

Many of these risks are written at 100% minimum earned. However, the minimum premium will continue to climb on a multi-year policy so that outpaces the earning. Rule of thumb would be that the policy is 100% fully earned at least two-thirds through a multi-year policy. Refer to policy language. Additionally, sample manuscript endorsements available.

Premium

CPL Limit: Contractor premiums are difficult to estimate without detailed knowledge of contractor revenues, operations and loss history.

CPL Owner's interest Limit Option: Construction Period plus 10 Years Completed Operations, Limit of \$10M – at \$50,000 Deductible = \$25,000 to \$35,000 annually (\$250,000 to \$350,000 for a 10-year term), not including applicable taxes and fees.

Pollution Liability Coverage Details

Summary

Pollution Liability is an insurance policy which protects business organizations against liability claims for bodily injury (BI), property damage (PD) and Cleanup (CU) arising out of premises and operations at scheduled locations. Coverage may include various extensions, including first party discovery, non-owned disposal sites, contingent transportation, emergency response, image restoration, and Natural Resource Damages. Additionally, as this coverage does not have reporting windows for events, it can be coordinated with other liability policies that may offer sudden & accidental pollution coverage, such as General Liability and Excess and Operators Extra Expense.

Pollution Liability (PL) coverage can be provided on an annual or multi-year policy term covering property, assets. Coverage is offered on a claims-made policy form for specifically scheduled assets. Coverage terms and conditions are governed by the complete terms and conditions of the policy, including restrictions and exclusions. Defense is included within the limit of liability, with possibility for additional defense outside. Limits are structured as per incident and aggregate. *Most often those limits are the same; however, some Insured's choose a split aggregate limit. A split aggregate makes it challenging to build a significant tower of limits.*

Coverage A: Third party claims for Bodily Injury, Property Damage or Remediation expenses

Coverage B: First party Remediation Expenses

Coverage C: Emergency Response Expenses

Coverage D: Evacuation Expenses

Coverage E: Image Restoration Expenses

Status of Market

The pollution market is hardening, fueled by claims and the exit of a major carrier. This has led to increased retentions, increased premiums, and lower limits. This has primarily applied to operators and facility owners. On the other hand, CO₂ sequestration has caught the attention of many insurers who want to be involved in the next trend, especially a green initiative. However, since CO₂ sequestration unrelated to enhanced oil recovery projects are rare, there is limited appetite at this moment. We anticipate that as more projects are developed and come to market, the coverage will be easier to obtain.

Many insurers offer coverage on an annual basis. However, some can offer on a multi-year basis. Therefore, it is important to remember the limits do not reinstate annually. However, this type of structure is advantageous as discounts are built into multi-year options. Pollution Liability is driven by severity, not frequency. Viable markets include Ironshore, Aspen, Ascot, Enviant, Hamilton, and Markel.

Review of Coverage

Coverage Limits

Benchmarking reveals an average Pollution Liability (PL) purchase of \$10M for annual and 2-3 year policies. Longer-term policies (such as 10 years) have larger limits to accommodate the possibility of erosion of the aggregate limit. At first glance, the average PL limit purchase of \$10M would appear lower than necessary to respond to recent pollution events. Pollution Liability is often purchased as an excess and difference in conditions coverage to sudden and accidental pollution coverage grants within the main liability program. Operational liability programs normally have much larger limits and serve as a natural downward influence on PL limits purchased. It is almost impossible to say how insurance programs covering CO₂ sequestration compare to the benchmark as there are so few working examples with pollution policies. Considering the nature of sequestration operations, contamination of an underground source of drinking water is likely to occur gradually and not be discovered until well after the event which caused it. Typical sudden & accidental pollution liability with discovery and reporting windows generally around 21 and 45-days respectively (and shorter) may not reasonably be expected to provide much coverage. Due to the novel nature of CO₂ sequestration operations and lack of an ability to rely on the sudden and accidental pollution grants within the operational liability, it is likely that selection of Pollution Liability limits by CO₂ sequestration operations will trend well above benchmarked limits.

For example, a leak in the well casing causing contamination of a source of underground drinking water could trigger various sections of the PL policy such as Coverages A, C and E and potentially D. Generally, the policy would respond to efforts to measure the extent of the contamination and compensate any users of the drinking water for property damage and/or bodily injury arising from the contamination. Costs to control the breach and restore the well to production would be covered under the OEE policy discussed in the following section.

Market capacity for PL for this risk is estimated at \$150M. A combined General Liability and Pollution Liability product is often preferred by other waste disposal operations as it tends to be more cost efficient than standalone liability and pollution towers. Given the novel nature of standalone CO₂ sequestration, this is certainly the desired option but may not be available until the market gains more comfort with sequestration operations.

Deductible

The minimum deductible for this risk will likely be \$250,000. Small credits are available for incremental increases in deductible but are generally not efficient. Deductible is usually established by market preference and premium for the overall account and limit. The preferred maximum deductible would be \$1,000,000, as very small discounts are provided above that amount. The deductible will be a self-insured retention versus a true deductible. Environmental markets do not typically analyze individual financial performance or require collateral for support.

Exclusions

Refer to Specimen Policy Form in Appendix B

Some of the basic exclusions in a PL policy are outlined below, however please note that this is not a complete listing of all exclusions or restrictions contained within the policy.

Applicable to All Insuring Agreements, Except as Indicated

-
- | | |
|---|---|
| <ul style="list-style-type: none"> • Criminal Fines, Penalties, and Assessments • Contractual Liability – except where noted in JOAs • Prior Waste Disposal Activities • Intentional Noncompliance • Internal Expenses • Insured vs. Insured • Asbestos and Lead • Employer Liability • Prior Knowledge/Non-Disclosure | <ul style="list-style-type: none"> • Identified Underground Storage Tank (unless scheduled) • Closure/Post Closure and Reclamation Costs • Drilling and Specialty Equipment • Divested Property • Damage to Insured's Products and Work • Insured's Professional Services • Products Liability • Property Damage to Conveyances • Costs to Cleanup Pits or Ponds |
|---|---|
-

Renewal

Operations: If PL is purchased on a standalone basis, then we recommend a multi-year period for premium efficiency. The longest available multi-year period for operating assets is usually three years. A combined GL/PL form may be available in the near future as Insurers become more comfortable with risk, technology and appetite. A combined form renews annually.

Post Injection Site Closure: After plugging of the injection well, it would be desirable (if possible) to purchase a 10-year policy to match the post injection site closure period.

Cancellation

Policy cancellation as per Section VII. Conditions clause E. on page 9 of the sample wording in Appendix B

Many of these risks are written at 100% minimum earned. However, the minimum premium will continue to climb on a multi-year policy so that outpaces the earning. Rule of thumb would be that the policy is 100% fully earned at least two-thirds through a multi-year policy. Refer to policy language. Additionally, sample manuscript endorsements available.

Premium

Pollution Legal Limit Options

PL Limit Option 1: Annual Limit of \$15M = \$125,000

PL Limit Option 2: Three-year Limit of \$25M = \$400,000

PL Limit Option 3: Three-year Limit of \$50M = \$700,000

All premiums are non-adjustable

Section Four

Operators Extra Expense Coverage Details

Operators Extra Expense (OEE), also known as Control of Well (COW), indemnifies owners against costs associated with a well out of control. The base coverage is divided into 3 coverage grants:

- A. Cost to control,
- B. Cost of re-drill or restoration of the well, and
- C. Cost of pollution clean-up

Coverage C. grant is of interest to this analysis but can only be triggered by a well out of control event per policy definition. Limits are also supplemented by various extensions (see below).

Review of Coverage

Coverage Limits

OEE policy limits are combined single limits of liability across all coverage sections and extensions for any one occurrence (including defense costs). Therefore, it is prudent to be conservative with limit selection. Conventional wisdom for OEE limit selection for exploration and production accounts holds that the OEE limit should be 3-5 times the dry hole cost of the well insured. While this approach tends to breakdown for uncommon well types and operations, it is considered the general benchmark in selecting limits. A comparison of five times the projected dry hole cost (\$5.8MM * 5 = \$29MM) and the sum of estimated Emergency and Remedial Response expenses from the FADP report (\$16.6MM) reveals that a limit of either \$25,000,000(100%) or \$30,000,000(100%) any one occurrence appears reasonable for both drilling and producing wells.

OEE and PL limits can be coordinated by the insured but the OEE limit is generally not viewed as substitute for PL coverage for the following reasons:

- The priority of payments clause on the OEE policy allows the Insured to direct the limit to whichever sections he chooses
- Operators prefer to reserve OEE limits for Cost to Control or Re-drill. These activities have been known to be very expensive in large or difficult claims and could leave little for pollution clean-up.
- Given the broader nature of PL coverage, insureds prefer to reserve PL limits for claims arising from an occurrence which would not be covered by either the OEE or Operational Liability program.

For example, a leak in the well casing causing contamination of a source of underground drinking water could trigger various sections of the OEE policy such as Coverages A, B and C. We recommend that Tundra SGS direct costs to control and restore the well to production first to the OEE

policy and deploy any remaining limit to clean-up pollution. The PL policy referenced above should be used to respond to all other remaining clean-up costs that are covered by the policy.

Coverage form should be as broad as possible and include such coverage extensions as: Making Wells Safe, Underground Control of Well, Care Custody and Control, Unlimited Re-Drill, Extended Re-Drill, Extended Pollution, and Removal of Wreck.

The load or credit associated with increased or diminished limits is discussed in the premium section.

Deductible

Often referred to as a retention or excess, the OEE policy carries a single deductible over all coverage sections. The Project should expect a deductible of between \$250,000(100%) and \$500,000(100%) any one occurrence for drilling and producing wells. Due to the small schedule and Minnkota's minimal well operating record, Insurers may be reluctant to offer lower deductibles.

The credit associated with increased deductibles is discussed in the premium section

Exclusions

A sample copy of the wording is provided in the Appendix C. Exclusions of note are:

-
- Fines or Penalties
 - Breach of Warranties Clause and breach of Due Diligence Clause
 - Delay or loss of use (adding Loss of Production Insurance would serve to add back coverage)
 - Costs arising out of a well which flow can be promptly controlled by use of onsite equipment or by increasing the weight of drilling fluid
 - Exclusion for claim recoverable under the policy solely by reason of the addition or attachment to Section A of the Underground Control of Well Endorsement. This exclusion should be amended or removed to better fit CO₂ Sequestration operations.
-

Renewal

Most OEE policies renew annually.

Cancellation

As per clause 13. Cancellation on page 9 of the sample policy wording in Appendix C

Premium

All premiums are annual minimum and deposit premiums which are adjustable for drilling wells and flat at inception for producing wells. Based on current market feedback, the \$100,000 minimum premium drives the premium during the operating phase due to the small schedule of wells and Minnkota's minimal well operating record. A contract operator could possibly leverage their experience and existing premium base to provide lower OEE premiums. Additionally, we may be able to negotiate lower premiums for the operating period once injection operations are established and the market is more comfortable with the risk.

Type of Well	Combined Single Limit	Est. Annual Premium
2 Broom Creek Wells (drilling phase)	\$25,000,000	Rate of 1.5% times Completed Well Cost (CWC), minimum annual premium \$100,000. Eg. CWC est. \$5.8M for each then Est. Annual Premium for 2 wells is \$174,000
	\$30,000,000 (option)	Rate of 1.7% on CWC, minimum annual premium of \$100,000. Eg. CWC est. \$5.8M for each then Est. Annual Premium for 2 wells is \$197,200
2 Broom Creek Wells (operating phase)	\$25,000,000	Rate of 10% of drilling rate subject to a minimum annual premium \$100,000. Est. Annual Premium is \$100,000
	\$30,000,000 (option)	Rate of 10% of drilling rate subject to a minimum annual premium \$100,000. Est. Annual Premium is \$100,000

Type of Well	Combined Single Limit	Est. Annual Premium
2 Broom Creek wells & 1 Deadwood Well (drilling phase)	\$25,000,000	Rate of 1.5% times Completed Well Cost (CWC), minimum annual premium \$100,000. Eg. CWC est. \$5.8M for each Broom Creek well and \$8.2M for the Deadwood well then Est. Annual Premium for 3 wells is \$297,000
	\$30,000,000 (option)	Rate of 1.7% on CWC, minimum annual premium of \$100,000. Eg. CWC est. \$5.8M for each Broom Creek well and \$8.2M for the Deadwood well then Est. Annual Premium for 3 wells is \$336,600
2 Broom Creek wells & 1 Deadwood well (operating phase)	\$25,000,000	Rate of 10% of drilling rate subject to a minimum annual premium \$100,000. Est. Annual Premium is \$100,000
	\$30,000,000 (option)	Rate of 10% of drilling rate subject to a minimum annual premium \$100,000. Est. Annual Premium is \$100,000

Appendix A

Contractors Pollution Wording



Ironshore sample
CPL wording.pdf

Appendix B

Pollution Liability Policy Wording



IE.COV.SPILLS.OG.001
1212 Oil and Gas Co

Appendix C

OEE Draft Policy Wording



EED FORM.pdf



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APPENDIX H

SURFACE USE AND PORE SPACE LEASE

**STORAGE AGREEMENT
TUNDRA DEADWOOD – SECURE GEOLOGIC STORAGE
OLIVER COUNTY, NORTH DAKOTA**

THIS AGREEMENT (“Agreement”) is entered into as of the 1st day of November 1, 2021, by the parties who have signed the original of this instrument, a counterpart thereof, ratification and joinder or other instrument agreeing to become a Party hereto.

RECITALS:

A. It is in the public interest to promote the geologic storage of carbon dioxide in a manner which will benefit the state and the global environment by reducing greenhouse gas emissions and in a manner which will help ensure the viability of the state's coal and power industries, to the economic benefit of North Dakota and its citizens;

B. To further geologic storage of carbon dioxide, a potentially valuable commodity, may allow for its ready availability if needed for commercial, industrial, or other uses, including enhanced recovery of oil, gas, and other minerals; and

C. For geologic storage, however, to be practical and effective requires cooperative use of surface and subsurface property interests and the collaboration of property owners, which may require procedures that promote, in a manner fair to all interests, cooperative management, thereby ensuring the maximum use of natural resources.

AGREEMENT:

It is agreed as follows:

**ARTICLE 1
DEFINITIONS**

As used in this Agreement:

1.1 **Carbon Dioxide** means carbon dioxide in gaseous, liquid, or supercritical fluid state together with incidental associated substances derived from the source materials, capture process and any substances added or used to enable or improve the injection process.

1.2 **Commission** means the North Dakota Industrial Commission.

1.3 **Effective Date** is the time and date this Agreement becomes effective as provided in Article 14.

1.4 **Facility Area** is the land described by Tracts in Exhibit “B” and shown on Exhibit “A” containing 18903.211 acres, more or less.

1.5 **Party** is any individual, corporation, limited liability company, partnership, association, receiver, trustee, curator, executor, administrator, guardian, tutor, fiduciary, or other representative of any kind, any department, agency, or instrumentality of the state, or any governmental subdivision thereof, or any other entity capable of holding an interest in the Storage Reservoir.

1.6 **Pore Space** means a cavity or void, whether natural or artificially created, in any subsurface stratum.

1.7 **Pore Space Interest** is a right to or interest in the Pore Space in any Tract within the boundaries of the Facility Area.

1.8 **Pore Space Owner** is a Party hereto who owns Pore Space Interest.

1.9 **Storage Equipment** is any personal property, lease and well equipment, plants and other facilities and equipment for use in Storage Operations.

1.10 **Storage Expense** is all costs, expense or indebtedness incurred by the Storage Operator pursuant to this Agreement for or on account of Storage Operations.

1.11 **Storage Reservoir** consists of the Pore Space and confining subsurface strata underlying the Facility Area described as the Opeche-Picard (Upper Confining Zone), Broom Creek (Storage Reservoir/Injection Zone), and Amsden (Lower Confining Zone) Formation(s) and which are defined as identified by the well logging suite performed at two stratigraphic wells, the J-LOC1 well (File No. 37380) and the J-ROC1 1 well (File No. 37672). The log suites included caliper, gamma ray (GR), density, porosity (neutron, density), dipole sonic, resistivity, spectral GR, a combinable magnetic resonance (CMR), and fracture finder log. Further, the logs were used to pick formation top depths and interpret lithology, petrophysical properties, and time-to-depth shifting of seismic data obtained from two 3D seismic surveys covering an area totaling 18.5 miles in and around the J-ROC1 1 (located in Section 4, Township 141 North, Range 83 West) and the J-LOC 1 (located in Section 27, Township 142 North, Range 84 West) stratigraphic wells located in Oliver County, North Dakota. Formation top depths were picked from the top of the Pierre Formation to the top of the Precambrian. These logs and data which encompass the stratigraphic interval from an average depth of 4,650 feet to an average depth of 5,450 feet within the limits of the Facility Area.

1.12 **Storage Facility** is the unitized or amalgamated Storage Reservoir created pursuant to an order of the Commission.

1.13 **Storage Facility Participation** is the percentage shown on Exhibit "C" for allocating payments for use of the Pore Space under each Tract identified in Exhibit "B".

1.14 **Storage Operations** are all operations conducted by the Storage Operator pursuant to this Agreement or otherwise authorized by any lease covering any Pore Space Interest.

1.15 **Storage Operator** is the person or entity named in Section 4.1 of this Agreement.

1.16 **Storage Rights** are the rights to explore, develop, and operate lands within the Facility Area for the storage of Storage Substances.

1.17 **Storage Substances** are Carbon Dioxide and incidental associated substances, fluids, and minerals.

1.18 **Tract** is the land described as such and given a Tract number in Exhibit "B."

ARTICLE 2 EXHIBITS

2.1 **Exhibits.** The following exhibits, which are attached hereto, are incorporated herein by reference:

2.1.1 Exhibit "A" is a map that shows the boundary lines of the Tundra Deadwood Facility Area and the tracts therein;

2.1.2 Exhibit "B" is a schedule that describes the acres of each Tract in the Tundra Deadwood Facility Area;

2.1.3 Exhibit "C" is a schedule that shows the Storage Facility Participation of each Tract; and

2.1.4 Exhibit "D" is a form of Surface Use and Pore Space Lease.

2.2 **Reference to Exhibits.** When reference is made to an exhibit, it is to the exhibit as originally attached or, if revised, to the last revision.

2.3 **Exhibits Considered Correct.** Exhibits "A," "B," "C" and "D" shall be considered to be correct until revised as herein provided.

2.4 **Correcting Errors.** The shapes and descriptions of the respective Tracts have been established by using the best information available. If it subsequently appears that any Tract, mechanical miscalculation or clerical error has been made, Storage Operator, with the approval of Pore Space Owners whose interest is affected, shall correct the mistake by revising the exhibits to conform to the facts. The revision shall not include any re-evaluation of engineering or geological interpretations used in determining Storage Facility Participation. Each such revision of an exhibit made prior to thirty (30) days after the Effective Date shall be effective as of the Effective Date. Each such revision thereafter made shall be effective at 7:00 a.m. on the first day of the calendar month next following the filing for record of the revised exhibit or on such other date as may be determined by Storage Operator and set forth in the revised exhibit.

2.5 **Filing Revised Exhibits.** If an exhibit is revised, Storage Operator shall execute an appropriate instrument with the revised exhibit attached and file the same for record in the county or counties in which this Agreement or memorandum of the same is recorded and shall also file the amended changes with the Commission.

ARTICLE 3
CREATION AND EFFECT OF STORAGE FACILITY

3.1 **Unleased Pore Space Interests.** Any Pore Space Owner in the Storage Facility who owns a Pore Space Interest in the Storage Reservoir that is not leased for the purposes of this Agreement and during the term hereof, shall be treated as if it were subject to the Surface Use and Pore Space Lease attached hereto as Exhibit "D".

3.2 **Amalgamation of Pore Space.** All Pore Space Interests in and to the Tracts are hereby amalgamated and combined insofar as the respective Pore Space Interests pertain to the Storage Reservoir, so that Storage Operations may be conducted with respect to said Storage Reservoir as if all of the Pore Space Interests in the Facility Area had been included in a single lease executed by all Pore Space Owners, as lessors, in favor of Storage Operator, as lessee and as if the lease contained all of the provisions of this Agreement.

3.3 **Amendment of Leases and Other Agreements.** The provisions of the various leases, agreements, or other instruments pertaining to the respective Tracts or the storage of the Storage Substances therein, including the Surface Use and Pore Space Lease attached hereto as Exhibit "D", are amended to the extent necessary to make them conform to the provisions of this Agreement, but otherwise shall remain in effect.

3.4 **Continuation of Leases and Term Interests.** Injection in to any part of the Storage Reservoir, or other Storage Operations, shall be considered as injection in to or upon each Tract within said Storage Reservoir, and such injection or operations shall continue in effect as to each lease as to all lands and formations covered thereby just as if such operations were conducted on and as if a well were injecting in each Tract within said Storage Reservoir.

3.5 **Titles Unaffected by Storage.** Nothing herein shall be construed to result in the transfer of title of the Pore Space Interest of any Party hereto to any other Party or to Storage Operator.

3.6 **Injection Rights.** Storage Operator is hereby granted the right to inject into the Storage Reservoir any Storage Substances in whatever amounts Storage Operator may deem expedient for Storage Operations, together with the right to drill, use, and maintain injection wells in the Facility Area, and to use for injection purposes.

3.7 **Transfer of Storage Substances from Storage Facility.** Storage Operator may transfer from the Storage Facility any Storage Substances, in whatever amounts Storage Operator may deem expedient for Storage Operations, to any other reservoir, subsurface stratum or formation permitted by the Commission for the storage of carbon dioxide under Chapter 38-22 of the North Dakota Century Code. The transfer of such Storage Substances out of the Storage Facility shall be disregarded for the purposes of calculating the royalty under any lease covering a Pore Space Interest (including Exhibit "D") and shall not affect the allocation of Storage Substances injected into the Storage Facility through the surface of the Facility Area in accordance with Article 6 of this Agreement.

3.8 **Receipt of Storage Substances.** Storage Operator may accept and receive into the Storage Facility any Storage Substances, in whatever amounts Storage Operator may deem expedient for Storage Operations, being stored in any other reservoir, subsurface stratum or formation permitted by the Commission for the storage of carbon dioxide under Chapter 38-22 of the North Dakota Century Code. The receipt of such Storage Substances into the Storage Facility shall be disregarded for the purposes of calculating the royalty under any lease covering a Pore Space Interest (including Exhibit "D") and shall not affect the allocation of Storage Substances injected into the Storage Facility through the surface of the Facility Area in accordance with Article 6 of this Agreement.

3.9 **Cooperative Agreements.** Storage Operator may enter into cooperative agreements with respect to lands adjacent to the Facility Area for the purpose of coordinating Storage Operations. Such cooperative agreements may include, but shall not be limited to, agreements regarding the transfer and receipt of Storage Substances pursuant to Sections 3.7 and 3.8 of this Agreement.

3.10 **Border Agreements.** Storage Operator may enter into an agreement or agreements with owners of adjacent lands with respect to operations which may enhance the injection of the Storage Substances in the Storage Reservoir in the Facility Area or which may otherwise be necessary for the conduct of Storage Operations.

ARTICLE 4 STORAGE OPERATIONS

4.1 **Storage Operator.** Minnkota Power Cooperative, Inc. is hereby designated as the initial Storage Operator. Storage Operator shall have the exclusive right to conduct Storage Operations, which shall conform to the provisions of this Agreement and any lease covering a Pore Space Interest. If there is any conflict between such agreements, this Agreement shall govern.

4.2 **Successor Operators.** The initial Storage Operator and any subsequent operator may, at any time, transfer operatorship of the Storage Facility with and upon the approval of the Commission.

4.3 **Method of Operation.** Storage Operator shall engage in Storage Operations with diligence and in accordance with good engineering and injection practices.

4.4 **Change of Method of Operation.** As permitted by the Commission nothing herein shall prevent Storage Operator from discontinuing or changing in whole or in part any method of operation which, in its opinion, is no longer in accord with good engineering or injection practices. Other methods of operation may be conducted or changes may be made by Storage Operator from time to time if determined by it to be feasible, necessary or desirable to increase the injection or storage of Storage Substances.

ARTICLE 5 TRACT PARTICIPATIONS

5.1 **Tract Participations.** The Storage Facility Participation of each Tract is shown in Exhibit "C." The Storage Facility Participation of each Tract shall be based 100% upon the ratio of surface acres in each Tract to the total surface acres for all Tracts within the Facility Area.

5.2 **Relative Storage Facility Participations.** If the Facility Area is enlarged or reduced, the revised Storage Facility Participation of the Tracts remaining in the Facility Area and which were within the Facility Area prior to the enlargement or reduction shall remain in the same ratio to one another.

ARTICLE 6 ALLOCATION OF STORAGE SUBSTANCES

6.1 **Allocation of Tracts.** All Storage Substances injected shall be allocated to the several Tracts in accordance with the respective Storage Facility Participation effective during the period that the Storage Substances are injected. The amount of Storage Substances allocated to each tract, regardless of whether the amount is more or less than the actual injection of Storage Substances from the well or wells, if any, on such Tract, shall be deemed for all purposes to have been injected into such Tract. Storage Substances transferred or received pursuant to Sections 3.7 and 3.8 of this Agreement shall be disregarded for the purposes of this Section 6.1.

6.2 **Distribution within Tracts.** The Storage Substances injected and allocated to each Tract shall be distributed among, or accounted for to, the Pore Space Owners who own a Pore Space Interest in such Tract in accordance with the Pore Space Owners' Storage Facility Participation effective during the period that the Storage Substances were injected. If any Pore Space Interest in a Tract hereafter becomes divided and owned in severalty as to different parts of the Tract, the owners of the divided interests, in the absence of an agreement providing for a different division, shall be compensated for the storage of the Storage Substances in proportion to the surface acreage of their respective parts of the Tract. Storage Substances transferred or received pursuant to Sections 3.7 and 3.8 of this Agreement shall be disregarded for the purposes of this Section 6.2.

ARTICLE 7 TITLES

7.1 **Warranty and Indemnity.** Each Pore Space Owner who, by acceptance of revenue for the injection of Storage Substances into the Storage Reservoir, shall be deemed to have warranted title to its Pore Space Interest, and, upon receipt of the proceeds thereof to the credit of such interest, shall indemnify and hold harmless the Storage Operator and other Parties from any loss due to failure, in whole or in part, of its title to any such interest.

7.2 **Injection When Title Is in Dispute.** If the title or right of any Pore Space Owner claiming the right to receive all or any portion of the proceeds for the storage of any Storage Substances allocated to a Tract is in dispute, Storage Operator shall require that the Pore Space Owner to whom the proceeds thereof are paid furnish security for the proper accounting thereof to the rightful Pore Space Owner if the title or right of such Pore Space Owner fails in whole or in part.

7.3 **Payments of Taxes to Protect Title.** The owner of surface rights to lands within the Facility Area is responsible for the payment of any *ad valorem* taxes on all such rights, interests or property, unless such owner and the Storage Operator otherwise agree. If any *ad valorem* taxes are not paid by or for such owner when due, Storage Operator may at any time prior to tax sale or expiration of period of redemption after tax sale, pay the tax, redeem such rights, interests or property, and discharge the tax lien. Storage Operator shall, if possible, withhold from any proceeds derived from the storage of Storage Substances otherwise due any Pore Space Owner who is a delinquent taxpayer an amount sufficient to defray the costs of such payment or redemption, such withholding to be credited to the Storage Operator. Such withholding shall be without prejudice to any other remedy available to Storage Operator.

7.4 **Pore Space Interest Titles.** If title to a Pore Space Interest fails, but the tract to which it relates is not removed from the Facility Area, the Party whose title failed shall not be entitled to share under this Agreement with respect to that interest.

ARTICLE 8 EASEMENTS OR USE OF SURFACE

8.1 **Grant of Easement.** Storage Operator shall have the right to use as much of the surface of the land within the Facility Area as may be reasonably necessary for Storage Operations and the injection of Storage Substances.

8.2 **Use of Water.** Storage Operator shall have and is hereby granted free use of water from the Facility Area for Storage Operations, except water from any well, lake, pond or irrigation ditch of a Pore Space Owner; notwithstanding the foregoing, Storage Operator may access any well, lake, or pond as provided in Exhibit "D".

8.3 **Surface Damages.** Storage Operator shall pay surface owners for damage to growing crops, timber, fences, improvements and structures located on the Facility Area that result from Storage Operations.

8.4 **Surface and Sub-Surface Operating Rights.** Except to the extent modified in this Agreement, Storage Operator shall have the same rights to use the surface and sub-surface and use of water and any other rights granted to Storage Operator in any lease covering Pore Space Interests. Except to the extent expanded by this Agreement or the extent that such rights are common to the effected leases, the rights granted by a lease may be exercised only on the land covered by that lease. Storage Operator will to the extent possible minimize surface impacts.

ARTICLE 9 ENLARGEMENT OF STORAGE FACILITY

9.1 **Enlargement of Storage Facility.** The Storage Facility may be enlarged from time to time to include acreage and formations reasonably proven to be geologically capable of storing Storage Substances. Any expansion must be approved in accordance with the rules and regulations of the Commission.

9.2 **Determination of Tract Participation.** Storage Operator, subject to Section 5.2, shall determine the Storage Facility Participation of each Tract within the Storage Facility as enlarged, and shall revise Exhibits “A”, “B” and “C” accordingly and in accordance with the rules, regulations and orders of the Commission.

9.3 **Effective Date.** The effective date of any enlargement of the Storage Facility shall be effective as determined by the Commission.

ARTICLE 10 TRANSFER OF TITLE PARTITION

10.1 **Transfer of Title.** Any conveyance of all or part of any interest owned by any Party hereto with respect to any Tract shall be made expressly subject to this Agreement. No change of title shall be binding upon Storage Operator, or any Party hereto other than the Party so transferring, until 7:00 a.m. on the first day of the calendar month following thirty (30) days from the date of receipt by Storage Operator of a photocopy, or a certified copy, of the recorded or filed instrument evidencing such a change in ownership.

10.2 **Waiver of Rights to Partition.** Each Party hereto agrees that, during the existence of this Agreement, it will not resort to any action to partition any Tract or parcel within the Facility Area or the facilities used in the development or operation thereof, and to that extent waives the benefits or laws authorizing such partition.

ARTICLE 11 RELATIONSHIP OF PARTIES

11.1 **No Partnership.** The duties, obligations and liabilities arising hereunder shall be several and not joint or collective. This Agreement is not intended to create, and shall not be construed to create, an association or trust, or to impose a partnership duty, obligation or liability with regard to any one or more of the Parties hereto. Each Party hereto shall be individually responsible for its own obligations as herein provided.

11.2 **No Joint Marketing.** This Agreement is not intended to provide, and shall not be construed to provide, directly or indirectly, for any joint marketing of Storage Substances.

11.3 **Pore Space Owners Free of Costs.** This Agreement is not intended to impose, and shall not be construed to impose, upon any Pore Space Owner any obligation to pay any Storage Expense unless such Pore Space Owner is otherwise so obligated.

11.4 **Information to Pore Space Owners.** Each Pore Space Owner shall be entitled to all information in possession of Storage Operator to which such Pore Space Owner is entitled by an existing lease or a lease imposed by this Agreement.

**ARTICLE 12
LAWS AND REGULATIONS**

12.1 **Laws and Regulations.** This Agreement shall be subject to all applicable federal, state and municipal laws, rules, regulations and orders.

**ARTICLE 13
FORCE MAJEURE**

13.1 **Force Majeure.** All obligations imposed by this Agreement on each Party, except for the payment of money, shall be suspended while compliance is prevented, in whole or in part, by a labor dispute, fire, war, civil disturbance, or act of God; by federal, state or municipal laws; by any rule, regulation or order of a governmental agency; by inability to secure materials; or by any other cause or causes, whether similar or dissimilar, beyond reasonable control of the Party. No Party shall be required against his will to adjust or settle any labor dispute. Neither this Agreement nor any lease or other instrument subject hereto shall be terminated by reason of suspension of Storage Operations due to any one or more of the causes set forth in this Article.

**ARTICLE 14
EFFECTIVE DATE**

14.1 **Effective Date.** This Agreement shall become effective as determined by the Commission.

14.2 **Ipsa Facto Termination.** If the requirements of Section 14.1 are not accomplished on or before April 1, 2022 this Agreement shall *ipso facto* terminate on that date (hereinafter called "termination date") and thereafter be of no further effect, unless prior thereto Pore Space Owners owning a combined Storage Facility Participation of at least thirty percent (30%) of the Facility Area have become Parties to this Agreement and have decided to extend the termination date for a period not to exceed six (6) months. If the termination date is so extended and the requirements of Section 14.1 are not accomplished on or before the extended termination date this Agreement shall *ipso facto* terminate on the extended termination date and thereafter be of no further effect.

14.3 **Certificate of Effectiveness.** Storage Operator shall file for record in the county or counties in which the land affected is located a certificate stating the Effective Date of this Agreement.

**ARTICLE 15
TERM**

15.1 **Term.** Unless sooner terminated in the manner hereinafter provided or by order of the Commission, this Agreement shall remain in full force and effect until the Commission has issued a certificate of project completion with respect to the Storage Facility in accordance with § 38-22-17 of the North Dakota Century Code.

15.2 **Termination by Storage Operator.** This Agreement may be terminated at any time by the Storage Operator with the approval of the Commission.

15.3 **Effect of Termination.** Upon termination of this Agreement all Storage Operations shall cease. Each lease and other agreement covering Pore Space within the Facility Area shall remain in force for ninety (90) days after the date on which this Agreement terminates, and for such further period as is provided by Exhibit "C" or other agreement.

15.4 **Salvaging Equipment Upon Termination.** If not otherwise granted by Exhibit "C" or other instruments affecting each Tract, Pore Space Owners hereby grant Storage Operator a period of six (6) months after the date of termination of this Agreement within which to salvage and remove Storage Equipment.

15.5 **Certificate of Termination.** Upon termination of this Agreement, Storage Operator shall file for record in the county or counties in which the land affected is located a certificate that this Agreement has terminated, stating its termination date.

ARTICLE 16 APPROVAL

16.1 **Original, Counterpart or Other Instrument.** A Pore Space Owner may approve this Agreement by signing the original of this instrument, a counterpart thereof, ratification or joinder or other instrument approving this instrument hereto. The signing of any such instrument shall have the same effect as if all Parties had signed the same instrument.

16.2 **Joinder in Dual Capacity.** Execution as herein provided by any Party as either a Pore Space Owner or the Storage Operator shall commit all interests owned or controlled by such Party and any additional interest thereafter acquired in the Facility Area.

16.3 **Approval by the North Dakota Industrial Commission.**
Notwithstanding anything in this Article to the contrary, all Tracts within the Facility Area shall be deemed to be qualified for participation if this Agreement is duly approved by order of the Commission.

ARTICLE 17 GENERAL

17.1 **Amendments Affecting Pore Space Owners.** Amendments hereto relating wholly to Pore Space Owners may be made with approval by the Commission.

17.4 **Construction.** This agreement shall be construed according to the laws of the State of North Dakota.

ARTICLE 18
SUCCESSORS AND ASSIGNS

18.1 **Successors and Assigns.** This Agreement shall extend to, be binding upon, and inure to the benefit of the Parties hereto and their respective heirs, devisees, legal representatives, successors and assigns and shall constitute a covenant running with the lands, leases and interests covered hereby.

[Remainder of page intentionally left blank. Signature page follows.]

Executed the date set opposite each name below but effective for all purposes as provided by Article 14.

Dated: _____, 2021

STORAGE OPERATOR

MINNKOTA POWER COOPERATIVE, INC.

By: _____

Its: _____

71751370.1

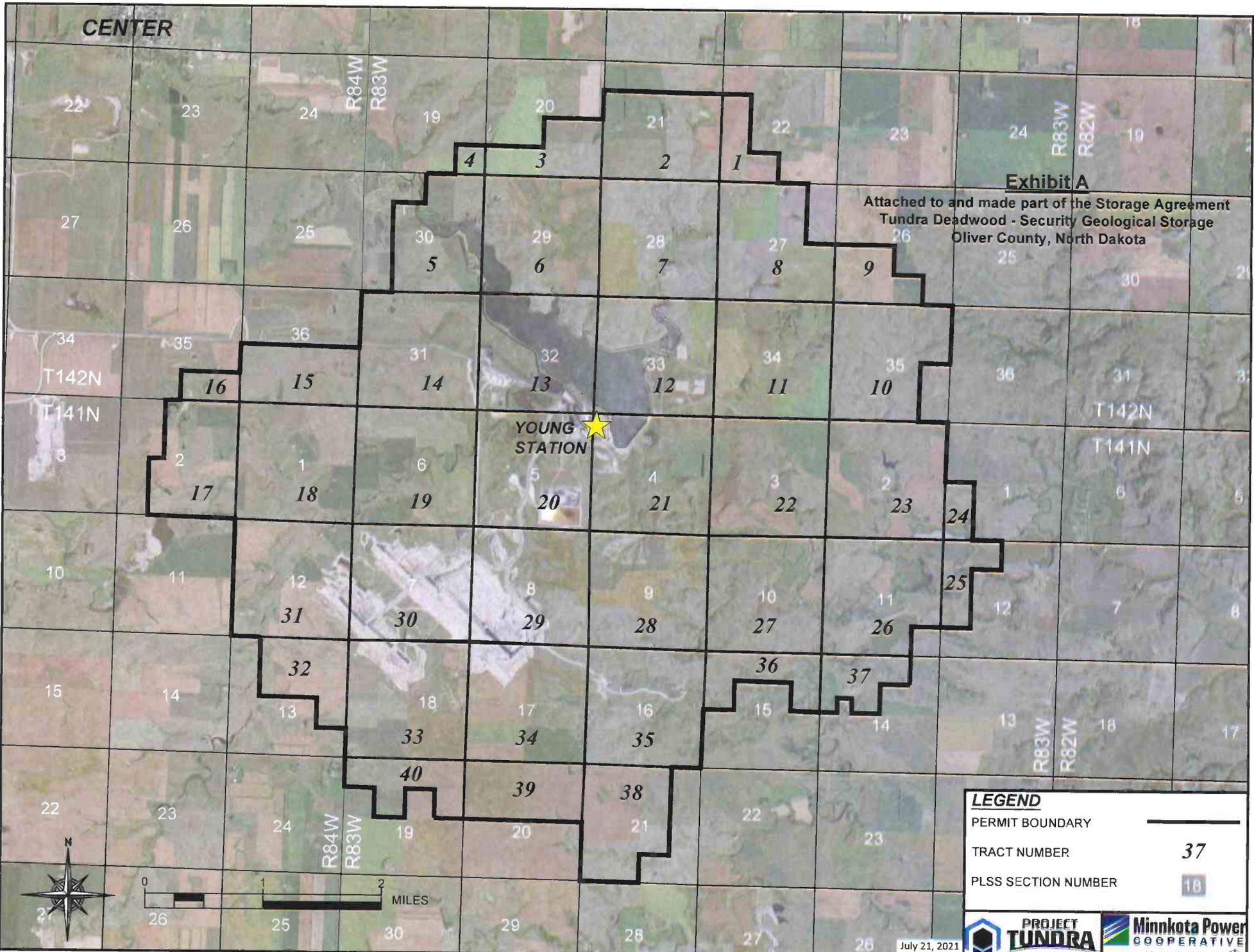


Exhibit A

Attached to and made part of the Storage Agreement
 Tundra Deadwood - Security Geological Storage
 Oliver County, North Dakota

YOUNG STATION ★

LEGEND

PERMIT BOUNDARY 

TRACT NUMBER **37**

PLSS SECTION NUMBER 

PROJECT TUNDRA  **Minnkota Power COOPERATIVE** 
A Dealing Energy Solutions

July 21, 2021

EXHIBIT B

Tract Summary

Attached to and made part of the Storage Agreement
Tundra Deadwood - Secure Geological Storage
Oliver County, North Dakota

<u>Tract No.</u>	<u>Land Description</u>	<u>Owner Name</u>	<u>Tract Net Acres</u>	<u>Tract Participation</u>	<u>Storage Facility Participation</u>
1	Section 22-T142N-R83W	Melvin Schoepp	20.000	12.50000000%	0.10580213%
		Caroline K. Schoepp	20.000	12.50000000%	0.10580213%
		Marie Mosbrucker	30.000	18.75000000%	0.15870320%
		Raymond Friedig	30.000	18.75000000%	0.15870320%
		Duane Friedig	30.000	18.75000000%	0.15870320%
		Shirley Hilzendeger	30.000	18.75000000%	0.15870320%
		Tract Total:		160.000	100.00000000%
2	Section 21-T142N-R83W	Jeff Erhardt and Mary Erhardt	120.000	25.00000000%	0.63481278%
		Keith Erhardt	35.000	7.29166667%	0.18515373%
		Keith Erhardt and Kelly Jo Erhardt	5.000	1.04166667%	0.02645053%
		Melvin Schoepp and Caroline Schoepp	320.000	66.66666667%	1.69283409%
		Tract Total:		480.000	100.00000000%
3	Section 20-T142N-R83W	Jeff Erhardt and Mary Erhardt	160.000	66.66666667%	0.84641705%
		Matthias A. Erhardt, as trustee of the Matthias A. Erhardt Trust dated December 27, 1994	40.000	16.66666667%	0.21160426%
		Josephine Erhardt, as trustee of the Josephine Erhardt Trust dated December 27, 1994	40.000	16.66666667%	0.21160426%
		Tract Total:		240.000	100.00000000%
4	Section 19-T142N-R83W	Matthias A. Erhardt, trustee, or successor trustee(s), of the Matthias A. Erhardt Trust dated December 27, 1994	20.000	50.00000000%	0.10580213%
		Josephine Erhardt, trustee, or successor trustee(s), of the Josephine Erhardt Trust dated December 27, 1994	20.000	50.00000000%	0.10580213%
		Tract Total:		40.000	100.00000000%
5	Section 30-T142N-R83W	Minnkota Power Cooperative, Inc.	322.170	73.22045455%	1.70431362%
		Ryan J. Weber	40.000	9.09090909%	0.21160426%

		Darlene Voegele	77.830	17.68863636%	0.41172899%
		Tract Total:	440.000	100.00000000%	
6	Section 29-T142N-R83W	Minnkota Power Cooperative, Inc.	92.360	14.43125000%	0.48859424%
		Darlene Voegele	227.640	35.56875000%	1.20423985%
		Charles Kuether	150.000	23.43750000%	0.79351598%
		Doris Kuether	150.000	23.43750000%	0.79351598%
		Terrie Nehring	20.000	3.12500000%	0.10580213%
		Tract Total:	640.000	100.00000000%	
7	Section 28-T142N-R83W	Minnkota Power Cooperative, Inc.	160.000	25.00000000%	0.84641705%
		Dale Barth	476.320	74.42500000%	2.51978354%
		Dusty Backer	3.680	0.57500000%	0.01946759%
		Tract Total:	640.000	100.00000000%	
8	Section 27-T142N-R83W	Dale Barth	560.000	100.00000000%	2.96245966%
		Tract Total:	560.000	100.00000000%	
9	Section 26-T142N-R83W	Raymond Friedig, as personal representative of the Estate of Magdalen F. Friedig, deceased	154.460	77.23000000%	0.81710986%
		Carl Schwalbe	13.333	6.66666667%	0.07053475%
		Heirs or Devisees of the Estate of Loren Schwalbe, deceased	13.333	6.66666667%	0.07053475%
		Rolland Schwalbe	13.333	6.66666667%	0.07053475%
		Randolph Middleton and Mary Middleton	5.540	2.77000000%	0.02930719%
		Tract Total:	200.000	100.00000000%	
10	Section 35-T142N-R83W	Brennan Price	560.000	100.00000000%	2.96245966%
		Tract Total:	560.000	100.00000000%	
11	Section 34-T142N-R83W	Minnkota Power Cooperative, Inc.	477.990	74.68593750%	2.52861802%
		State of North Dakota	160.000	25.00000000%	0.84641705%
		County of Oliver	2.010	0.31406250%	0.01063311%
		Tract Total:	640.000	100.00000000%	
12	Section 33-T142N-R83W	Square Butte Electric Cooperative	3.900	0.60937500%	0.02063142%
		Minnkota Power Cooperative, Inc.	625.040	97.66250000%	3.30652819%
		ALLETE, INC.	11.060	1.72812500%	0.05850858%
		Tract Total:	640.000	100.00000000%	
13	Section 32-T142N-R83W	Minnkota Power Cooperative, Inc.	465.830	72.78593750%	2.46429033%
		Heirs or Devisees of Alex Sorge, deceased	80.000	12.50000000%	0.42320852%

		Darlene Voegele	37.470	5.85468750%	0.19822029%
		BNI Coal, Ltd.	56.700	8.85937500%	0.29994904%
		Tract Total:	640.000	100.00000000%	
14	Section 31-T142N-R83W	Robert Reinke	456.910	70.56743065%	2.41710258%
		Darlene Voegele	149.640	23.11113857%	0.79161154%
		BNI Coal, Ltd.	40.930	6.32143078%	0.21652406%
		Tract Total:	647.480	100.00000000%	
15	Section 36-T142N-R84W	State of North Dakota Board of University and School Lands	320.000	100.00000000%	1.69283409%
		Tract Total:	320.000	100.00000000%	
16	Section 35-T142N-R84W	Michael P. Dresser	80.000	100.00000000%	0.42320852%
		Tract Total:	80.000	100.00000000%	
17	Section 2-T141N-R84W	City of Center Park District	46.050	10.68544545%	0.24360941%
		Barry A. Berger and Carrie Berger	286.460	66.47020505%	1.51540392%
		Dwight Wrangham and Linda Wrangham	3.000	0.69612029%	0.01587032%
		BNI Coal, Ltd.	95.450	22.14822721%	0.50494067%
		Tract Total:	430.960	100.00000000%	
18	Section 1-T141N-R84W	Jolene Berger	627.320	97.93917442%	3.31858963%
		Travis Klatt and Jessica Klatt	8.310	1.29738338%	0.04396079%
		Gary Leinius	4.890	0.76344220%	0.02586862%
		Tract Total:	640.520	100.00000000%	
19	Section 6-T141N-R83W	Brian Reinke	19.577	3.02274377%	0.10356336%
		Benjamin Reinke	30.997	4.78601096%	0.16397532%
		Elizabeth Wagendorf	30.997	4.78601096%	0.16397532%
		Jolene Berger	245.840	37.95877403%	1.30051979%
		Gary Leinius	320.240	49.44646028%	1.69410372%
		Tract Total:	647.650	100.00000000%	
20	Section 5-T141N-R83W	Minnkota Power Cooperative, Inc.	641.12000000	99.92518703%	3.39159310%
		Square Butte Electric Cooperative	0.48000000	0.07481297%	0.00253925%
		Tract Total:	641.600	100.00000000%	
21	Section 4-T141N-R83W	Square Butte Electric Cooperative	3.820	0.59499704%	0.02020821%
		Minnkota Power Cooperative, Inc.	638.200	99.40500296%	3.37614599%
		Tract Total:	642.020	100.00000000%	

22	Section 3-T141N-R83W	Minnkota Power Cooperative, Inc. Alan Schwalbe Tract Total:	7.720 634.240 641.960	1.20256714% 98.79743286% 100.00000000%	0.04083962% 3.35519717%
23	Section 2-T141N-R83W	Carl Schwalbe Rolland Schwalbe Loren Schwalbe Tract Total:	214.347 214.347 214.347 643.041	33.33333333% 33.33333333% 33.33333333% 100.00000000%	1.13391846% 1.13391846% 1.13391846%
24	Section 1-T141N-R83W	Carl Schwalbe Rolland Schwalbe Loren Schwalbe Tract Total:	26.667 26.667 26.667 80.000	33.33333333% 33.33333333% 33.33333334% 100.00000000%	0.14106951% 0.14106951% 0.14106951%
25	Section 12-T141N-R83W	Richard A. Schwalbe and Lila M. Schwalbe Tract Total:	160.000 160.000	100.00000000% 100.00000000%	0.84641705%
26	Section 11-T141N-R83W	Alan Schwalbe Julie Hatzenbihler Rodney J. Hatzenbihler Nancy Henke Bonnie Schwab Peggy Gobar Annette Hatzenbihler Brent Hatzenbihler Randy Hatzenbihler Tract Total:	480.000 15.000 15.000 15.000 15.000 15.000 15.000 15.000 15.000 600.000	80.00000000% 2.50000000% 2.50000000% 2.50000000% 2.50000000% 2.50000000% 2.50000000% 2.50000000% 2.50000000% 100.00000000%	2.53925114% 0.07935160% 0.07935160% 0.07935160% 0.07935160% 0.07935160% 0.07935160% 0.07935160% 0.07935160%
27	Section 10-T141N-R83W	Alan Schwalbe Minnkota Power Cooperative, Inc. Delmar Hagerott Tract Total:	237.840 2.160 400.000 640.000	37.16250000% 0.33750000% 62.50000000% 100.00000000%	1.25819894% 0.01142663% 2.11604261%
28	Section 9-T141N-R83W	Minnkota Power Cooperative, Inc. Tract Total:	640.000 640.000	100.00000000% 100.00000000%	3.38566818%
29	Section 8-T141N-R83W	BNI Coal, Ltd. Minnkota Power Cooperative, Inc. Five D's, LLP Tract Total:	161.000 160.000 319.000 640.000	25.15625000% 25.00000000% 49.84375000% 100.00000000%	0.85170715% 0.84641705% 1.68754398%

30	Section 7-T141N-R83W	Janet K. Dohrmann and L. J. Dohrmann, Trustees of the Janet and L. J. Dohrmann Revocable Trust	328.460	50.65231471%	1.73758839%
		Gary Leinius	320.000	49.34768529%	1.69283409%
		Tract Total:	648.460	100.00000000%	
31	Section 12-T141N-R84W	Jolene Berger	160.00000000	25.00000000%	0.84641705%
		Brian Dresser	320.00000000	50.00000000%	1.69283409%
		Frances Fuchs	160.00000000	25.00000000%	0.84641705%
		Tract Total:	640.000	100.00000000%	
32	Section 13-T141N-R84W	Mark Leischner and Susan Leischner	280.000	100.00000000%	1.48122983%
		Tract Total:	280.000	100.00000000%	
33	Section 18-T141N-R83W	Janet K. Dohrmann and L.J. Dohrmann, as Trustees of The Janet and L.J. Fast Revocable Trust	123.820	19.12100809%	0.65502099%
		Wayne Reuther	33.957	5.24378693%	0.17963438%
		Kent Reuther	33.957	5.24378693%	0.17963438%
		Keith Reuther	33.957	5.24378693%	0.17963438%
		Karen Shulz	33.957	5.24378693%	0.17963438%
		Jerald Reuther	33.957	5.24378693%	0.17963438%
		Martha Reuther	33.957	5.24378693%	0.17963438%
		Larry F. Schmidt and Virginia Schmidt	320.000	49.41627031%	1.69283409%
		Tract Total:	647.560	100.00000000%	
		34	Section 17-T141N-R83W	Five D's LLP	320.000
Jerald O. Reuther	79.698			12.45286458%	0.42161267%
Wayne A. Reuther	53.333			8.33333333%	0.28213902%
Karen L. Reuther	26.667			4.16666667%	0.14106951%
Jeanette M. Reuther	0.302			0.04713542%	0.00159585%
Larry F. Schmidt and Virginia Schmidt	160.000			25.00000000%	0.84641705%
Tract Total:	640.000			100.00000000%	
35	Section 16-T141N-R83W			Larry F. Schmidt and Virginia Schmidt	160.000
		BNI Coal, Ltd.	160.000	25.00000000%	0.84641705%
		Oliver County	2.510	0.39218750%	0.01327817%
		State of North Dakota - Dept. of Trust Lands Attn: Commissioner of University and School Lands	317.490	49.60781250%	1.67955592%
		Tract Total:	640.000	100.00000000%	
36	Section 15-T141N-R83W	Delmar Hagerott	240.000	100.00000000%	1.26962557%
		Tract Total:	240.000	100.00000000%	

37	Section 14-T141N-R83W	Alan Schwalbe	190.000	100.00000000%	1.00512024%
		Tract Total:	190.000	100.00000000%	
38	Section 21-T141N-R83W	Douglas D. Doll and Deberra K. Doll	100.000	22.72727273%	0.52901065%
		James D. Pazdernik and Bonita Pazdernik	100.000	22.72727273%	0.52901065%
		Anton Pflieger and Helen Pflieger	160.000	36.36363636%	0.84641705%
		Delmar Hagerott	80.000	18.18181818%	0.42320852%
		Tract Total:	440.000	100.00000000%	
39	Section 20-T141N-R83W	Douglas D. Doll and Deberra K. Doll	80.000	25.00000000%	0.42320852%
		James D. Pazdernik and Bonita Pazdernik	80.000	25.00000000%	0.42320852%
		Dale P. Pfliger and Judy Pfliger	80.000	25.00000000%	0.42320852%
		Thomas Pfliger	80.000	25.00000000%	0.42320852%
		Tract Total:	320.000	100.00000000%	
40	Section 19-T141N-R83W	Winfrid Keller	120.000	49.59497438%	0.63481278%
		Jerald Reuther	23.684	9.78839478%	0.12529088%
		Wayne Reuther	23.684	9.78839478%	0.12529088%
		Kent Reuther	23.684	9.78839478%	0.12529088%
		Keith Reuther	27.224	11.25144652%	0.14401786%
		Karen Shulz	23.684	9.78839478%	0.12529088%
		Tract Total:	241.960	100.00000000%	
Total Acres:			18903.211	Total Participation:	100.00000000%

EXHIBIT C

Tract Participation Factors

Attached to and made part of the Storage Agreement
Tundra Deadwood - Secure Geological Storage
Oliver County, North Dakota

<u>Tract No.</u>	<u>Acres</u>	<u>Tract Participation Factor</u>
1	160.000	0.84641705%
2	480.000	2.53925114%
3	240.000	1.26962557%
4	40.000	0.21160426%
5	440.000	2.32764687%
6	640.000	3.38566818%
7	640.000	3.38566818%
8	560.000	2.96245966%
9	200.000	1.05802131%
10	560.000	2.96245966%
11	640.000	3.38566818%
12	640.000	3.38566818%
13	640.000	3.38566818%
14	647.480	3.42523818%
15	320.000	1.69283409%
16	80.000	0.42320852%
17	430.960	2.27982431%
18	640.520	3.38841904%
19	647.650	3.42613750%
20	641.600	3.39413235%
21	642.020	3.39635420%
22	641.960	3.39603679%
23	643.041	3.40175539%
24	80.000	0.42320852%
25	160.000	0.84641705%
26	600.000	3.17406392%
27	640.000	3.38566818%
28	640.000	3.38566818%
29	640.000	3.38566818%
30	648.460	3.43042248%
31	640.000	3.38566818%
32	280.000	1.48122983%
33	647.560	3.42566139%
34	640.000	3.38566818%
35	640.000	3.38566818%
36	240.000	1.26962557%
37	190.000	1.00512024%
38	440.000	2.32764687%
39	320.000	1.69283409%
40	241.960	1.27999418%
Total:	18903.211	100.00000000%

EXHIBIT D

Surface Use And Pore Space Lease
Attached to and made part of the Storage Agreement
Tundra Deadwood
Oliver County, North Dakota

SURFACE USE AND PORE SPACE LEASE

THIS SURFACE USE AND PORE SPACE LEASE (“**Lease**”) is made, entered into, and effective as of the _____ day of _____, 2020 (“**Effective Date**”) by and between _____, whose address is _____ (whether one or more, “**Lessor**”), and Minnkota Power Cooperative, Inc., a Minnesota cooperative association, whose address is _____ (whether one or more, “**Lessee**”). Lessor and Lessee are sometimes referred to in this Lease individually as a “**Party**” and collectively as the “**Parties.**”

1. DEFINITIONS. The following terms shall have the following meanings in this Lease:

“**Carbon Dioxide**” means carbon dioxide in gaseous, liquid, or supercritical fluid state together with incidental associated substances derived from the source materials, capture process and any substances added or used to enable or improve the injection process.

“**Commencement of Operations**” means the date on which Carbon Dioxide is first injected into a Reservoir for commercial operations under this Lease, provided that the performance of test injections and related activities shall not be deemed Commencement of Operations.

“**Commission**” means the North Dakota Industrial Commission.

“**Completion Notice**” means a certificate of project completion issued to Lessee by the Commission pursuant to Chapter 38-22 of the North Dakota Century Code.

“**Environmental Attributes**” means any and all credits, benefits, emissions reductions, offsets, and allowances, howsoever entitled, attributable to the Operations, including any avoided emissions and the reporting rights related to these avoided emissions, such as 26 U.S.C. §45Q Tax Credits.

“**Environmental Incentives**” means any and all credits, rebates, subsidies, payments or other incentives that relate to the use of technology incorporated into the Operations, environmental benefits of Operations, or other similar programs available from any regulated entity or any Governmental Authority.

“**Facilities**” means all facilities, structures, improvements, fixtures, equipment, and any other personal property at any time acquired or constructed by or for Lessee that are necessary or desirable in connection with any use of Reservoirs and their Formations or Operations, including without limitation wells, pipelines, roads, utilities, metering or monitoring equipment, and buildings.

“**Financing Parties**” means person or persons providing construction or permanent financing to Lessee in connection with construction, ownership, operation and maintenance of Facilities or Operations, including financial institutions, leasing companies, institutions, tax equity partners, joint venture partners and/or private lenders.

“**Formation**” means the geological formation of which any Reservoir is a part.

“**Hazardous Substance**” means any chemical, waste or other substances, expressly excluding Carbon Dioxide and Non-Native Carbon Dioxide, (a) which now or hereafter becomes defined as or included in the definition of “hazardous substances,” “hazardous wastes,” “hazardous materials,” “extremely hazardous wastes,” “restricted hazardous wastes,” “toxic substances,” “toxic pollutants,” “pollutions,” “pollutants,” “regulated substances,” or words of similar import under any law

pertaining to environment, health, safety or welfare, (b) which is declared to be hazardous, toxic or polluting by any Governmental Authority, (c) exposure to which now or hereafter prohibited, limited or regulated by any Governmental Authority, (d) the storage, use, handling, disposal or release of which is restricted or regulated by any Governmental Authority, or (e) for which remediation or cleanup is required by any Governmental Authority.

“Leased Premises” means the surface and subsurface of the land, excluding mineral rights, described in Exhibit A of this Lease.

“Native Oil and Gas” means all oil, natural gas, and other hydrocarbons present in and under the Leased Premises and not injected by Lessor, Lessee or any third party.

“Non-Native Carbon Dioxide” means Carbon Dioxide that is not naturally occurring in the Reservoir together with incidental associated substances, fluids, minerals, oil, and gas, excluding that which, independent of Operations, originates from an accumulation meeting the definition of a Pool. All Non-Native Carbon Dioxide will be considered personal property of the Lessee and its successor and assigns under this Agreement.

“Operating Year” means the calendar year or portion of the calendar year following Commencement of Operations during which Operations occur.

“Operations” means the transportation and injection of Carbon Dioxide into a Reservoir after Commencement of Operations, and any withdrawal of this Carbon Dioxide, as well as the withdrawal of Non-Native Carbon Dioxide, for sale or disposal in accordance with applicable law.

“Option Money” means 20 percent of the Initial Term Payment (as such term is defined in that certain Option to Lease between Lessor and Lessee with respect to the Leased Premises).

“Pool” means an underground Reservoir containing a common accumulation of Native Oil and Gas that is economically recoverable. A zone of a structure that is completely separated from any other zone in the same structure is a Pool.

“Pore Space” means a cavity or void, whether natural or artificially created, in a Reservoir.

“Related Person” means any member, partner, principal, officer, director, shareholder, predecessor-in-interest, successor-in-interest, employee, agent, heir, representative, contractor, lessee, sublessee, licensee, invitee, permittee of a Party, Financing Parties or any other person or entity that has obtained or in future obtains rights or interests from, under or through a Party (excluding the other Party itself).

“Reservoir” means any subsurface stratum, sand, formation, aquifer, cavity or void, whether natural or artificially created, wholly or partially within the Leased Premises, suitable for the storage or sequestration of carbon dioxide or other gaseous substances.

“Storage Fee” means Lessor’s proportionate share of sixteen cents (\$0.16) per metric ton of Carbon Dioxide (“Storage Rate”) as determined by the Lessee’s last meter before injection as part of Operations. For injection periods after 2026, the Storage Rate shall be adjusted to an amount equal to the product of sixteen cents (\$0.16) and the inflation adjustment factor for such calendar year. The inflation adjustment factor shall be determined in the same manner as provided in 26 U.S.C. §45Q(f)(7)(B), substituting “2026” for “2008”. The Storage Fee shall be: (i) calculated separately for each amalgamated area as created and established by the Commission that includes any portion of the Leased Premises; (ii) limited to the Carbon Dioxide injected in said amalgamated area in the immediately preceding Operating Year; and (iii) based on the Lessor’s proportionate per net acre share of said unit. For avoidance of doubt, the Lessor shall receive a separate Storage Fee for each amalgamated area created and established by the Commission that includes any portion of the Leased Premises on a net acre basis within the Lessor’s interest being the numerator and the acres in the amalgamated area being the denominator.

“Tax Credits” means any and all (a) investment tax credits, (b) production tax credits, (c)

credits under 26 U.S.C. §45Q credits, and (d) similar tax credits or grants under federal, state or local law relating to construction, ownership or Operations

2. LEASE RIGHTS. In consideration of the compensation, covenants, agreements, and conditions set forth in this Lease, Lessor grants, demises, leases and lets to Lessee the exclusive right to use all Pore Space, Reservoirs and their Formations in the Leased Premises for any purpose not previously granted or reserved by an instrument of record related to the capture, injection, storage, sequestration, sale, withdrawal or disposal of Carbon Dioxide, Non-Native Carbon Dioxide and incidental associated substances, fluids, and minerals, provided that Lessee shall have no right to use potable water from within the Leased Premises in Operations; together with the following exclusive rights:

(a) to use the Leased Premises for developing, constructing, installing, improving, maintaining, replacing, repowering, relocating, removing, abandoning in place, expanding, and operating Facilities;

(b) to lay, maintain, replace, repair, and remove roads on the Leased Premises to allow Lessee, in its sole discretion, to exercise its rights under this Lease; and

(c) to enter upon and use the Leased Premises for the purposes of conducting:

(i) any investigations, studies, surveys, and tests, including without limitation drilling and installing test wells and monitoring wells, seismic testing, and other activities as Lessee deems necessary or desirable to determine the suitability of the Leased Premises for Operations,

(ii) any inspections and monitoring of Reservoirs and Carbon Dioxide as Lessee or any governmental authority deems necessary or desirable during the term of this Lease, and

(iii) any maintenance to the Facilities that Lessee or any governmental authority deems necessary or as required by applicable law.

Lessor also hereby grants and conveys unto Lessee all other and further easements across, over, under and above the Leased Premises as reasonably necessary to provide access to and services reasonably required for Lessee's performance under the Lease. The easements granted hereunder shall run with and burden the Leased Premises for the term of this Lease. Notwithstanding the surface easements granted herein, Lessee shall provide notice to Lessor prior to accessing the surface of the Property, and if such activity requires permit then prior notice shall be in form and not be less than that required by law or rule.

Lessee may exercise its rights under this Lease in conjunction with related operations on other properties near the Leased Premises. Lessee shall have no obligation, express or implied, to begin, prosecute or continue storage operations in, upon or under the Leased Premises, or to store and/or sell or use all or any portion of the gaseous substances stored thereon. The timing, nature, manner and extent of Lessee's operations, if any, under this Lease shall be at the sole discretion of Lessee. All obligations of Lessee are expressed herein, and there shall be no covenants implied under this Lease, it being agreed that all amounts paid hereunder constitute full and adequate consideration for this Lease.

3. INITIAL TERM. This Lease shall commence on the Effective Date and shall continue for an initial term of twenty (20) years ("Initial Term") unless sooner terminated in accordance with the terms of this Lease. Lessee may, but is not obligated to, extend the Initial Term for up to four successive five-year periods by paying Lessor \$25.00 per net acre in the Leased Premises per five-year extension on or prior to the last day of the Initial Term or expiring five-year extension period. The Initial Term together with any extensions are referred to as the "Primary Term."

4. OPERATIONAL TERM. Upon Commencement of Operations at any time during the Primary Term, this Lease shall continue for so long as any portion of the Leased Premises or

Lessee's Facilities are subject to a permit issued by the Commission or under the ownership or control of the State of North Dakota ("Operational Term"); *provided, however*, that all of Lessee's obligations under this Lease shall terminate upon issuance of a Completion Notice, except for payment of the Final Royalty Payment (as applicable), and Final Occupancy Fee (as applicable). If Commencement of Operations does not occur during the Primary Term, this Lease shall terminate, and Lessee shall execute a document evidencing termination of this Lease in recordable form and shall record it in the official records of the county in which the Leased Premises is located.

5. COMPENSATION.

(a) **Initial Term Payment.** Lessee shall pay to Lessor the greater of \$50.00 per net acre in the Leased Premises ("Initial Term Payment") or a one-time flat \$500.00 payment, the receipt and sufficiency of which are hereby acknowledged.

(b) **Royalty.** During the Operational Term, Lessee shall annually on or before May 31st pay to Lessor a royalty equal to the greater of a flat \$100.00 payment or the Storage Fee(s) for the immediately preceding Operating Year. For the Operating Year in which Lessee provides Lessor with a Completion Notice, Lessee shall pay a pro rata share of the Storage Fee(s) ("Final Royalty Payment"), as applicable, and said payment shall be made within sixty days after the date the Completion Notice was issued.

(c) **Occupancy Fee.** Within sixty days of the anniversary of the Effective Date after which any Facilities are installed or used, Lessee shall pay Lessor, as applicable, a one-time fee of (i) \$3,000.00 per net surface acre of the Leased Premises occupied by Facilities (excluding pipelines), and (ii) \$1.50 for each linear foot of pipeline in place on the Leased Premises. For the year in which Lessee provides Lessor with a Completion Notice, Lessee shall pay any fees owed pursuant to this provision ("Final Occupancy Fee") within sixty days after the date the Completion Notice was issued.

Lessor and Lessee agree that the Lease shall continue as specified herein even in the absence of Operations and the payment of royalties.

6. AMALGAMATION. (a) Lessee, in its sole discretion, shall have the right and power, at any time (including both before and after Commencement of Operations), to pool, unitize, or amalgamate any Reservoir or portion of a Reservoir with any other lands or interests into which that Reservoir extends and document such unit in accordance with applicable law or agency order. Amalgamated units shall be of such shape and dimensions as Lessee may elect and as are approved by the Commission. Amalgamated areas may include, but are not required to include, land upon which injection or extraction wells have been completed or upon which the injection and/or withdrawal of Carbon Dioxide and Non-Native Carbon Dioxide has commenced prior to the effective date of amalgamation. In exercising its amalgamation rights under this Lease and if required by law, Lessee shall record or cause to be recorded a copy of the Commission's amalgamation order or other notice thereof in the county in which the amalgamated unit. Amalgamating in one or more instances shall, if approved by the Commission, not exhaust the rights of Lessee to amalgamate Reservoirs or portions of Reservoirs into other amalgamation areas, and Lessee shall have the recurring right to revise any amalgamated area formed under this Lease by expansion or contraction or both. Lessee may dissolve any amalgamated area at any time and document such dissolution by recording an instrument in accordance with applicable law or agency order. Lessee shall have the right to negotiate, on behalf of and as agent for Lessor, any unit agreements and operating agreements with respect to the operation of any amalgamated areas formed under this Lease. (b) The injection and/or withdrawal of Carbon Dioxide and Non-Native Carbon Dioxide into a Reservoir from any property within a amalgamated area that includes the Leased Premises shall be treated as if Operations were occurring on the Leased Premises, except that the royalty payable to Lessor under Section 5(b) of this Lease shall be Lessor's per net acre proportionate share of the total Storage Fee for the preceding Operating year's injection of Carbon Dioxide into the amalgamated area.

7. ENVIRONMENTAL INCENTIVES. Unless otherwise specified, Lessee is the owner of all

Environmental Attributes and Environmental Incentives and is entitled to the benefit of all Tax Credits or any other attributes of ownership of the Facilities and Operations. Lessor shall cooperate with Lessee in obtaining, securing and transferring all Environmental Attributes and Environmental Incentives and the benefit of all Tax Credits. Lessor shall not be obligated to incur any out-of-pocket costs or expenses in connection with such actions unless reimbursed by Lessee. If any Environmental Incentives are paid directly to Lessor, Lessor shall immediately pay such amounts over to Lessee.

8. SURRENDER OF LEASED PREMISES. Lessee shall have the unilateral right at any time and from time to time to execute and deliver to Lessor a written notice of surrender and/or release covering all or any part of the Leased Premises for which the subsurface pore space is not being utilized for storage as set forth herein, and upon delivery of such surrender and/or release to Lessor this Lease shall terminate as to such lands, and Lessee shall be released from all further obligations and duties as to the lands so surrendered and/or released, including, without limitation, any obligation to make payments provided for herein, except obligations accrued as of the date of the surrender and/or release.

9. FACILITIES.

- (a) Lessee shall in good faith consult with Lessor regarding the location of the Facilities, selection of the Facilities location shall be within the discretion of the Lessee with consent of the Lessor, not to be unreasonably withheld. The withholding of such consent by the Lessor regarding the location of the Facilities shall be deemed "unreasonable" if the proposed location of the Facility is located more than 500 feet from any occupied dwellings or currently used buildings existing on the Leased Premises as of the Effective Date. Notwithstanding the foregoing, in no event shall Facilities be located within 500 feet of any currently occupied dwelling or currently used building existing on the Leased Premises as of the Effective Date without Lessor's express consent. Lessee may erect fences around all or part of any aboveground Facilities (excluding roads) to separate Facilities from adjacent Lessor-controlled lands, and shall do so if Lessor so requests. Lessee shall maintain and repair at its expense any roads it constructs on the Leased Premises in reasonably safe and usable condition.
- (b) Lessor and Lessee agree that all Facilities and property of whatever kind and nature constructed, placed or affixed on the rights-of-way, easements, patented or leased lands as part of Lessee's Operations, as against all parties and persons whomsoever (including without limitation any party acquiring interest in the rights-of-way, easements, patented or leased lands or any interest in or lien, claim or encumbrance against any of such Facilities), shall be deemed to be and remain the property of the Lessee, and shall not be considered to be fixtures or a part of the Leased Premises. Lessor waives, to the fullest extent permitted by applicable law, any and all rights it may have under the laws of the State of North Dakota, arising under this Lease, by statute or otherwise to any lien upon, or any right to distress or attachment upon, or any other interest in, any item constituting the Facilities or any other equipment or improvements constructed or acquired by or for Lessee and located on the leased Premises or within any easement area. Each Lessor and Lessee agree that the Lessee (or the designated assignee of Lessee or Financing Parties) is the tax owner of any such Facilities, structures, improvements, equipment and property of whatever kind and nature and all tax filings and reports will be filed in a manner consistent with this Lease. Facilities shall at all times retain the legal status of personal property as defined under Article 9 of the Uniform Commercial Code. If there is any mortgage or fixture filing against the Premises which could reasonably be construed as prospectively attaching to the Facilities as a fixture of the Premises, Lessor shall provide a disclaimer or release from such lienholder. Lessor, as fee owner, consents to the filing of a disclaimer of the Facilities as a fixture of the Premises in the Oliver County Recorder's Office, or where real estate records of Oliver County are customarily filed.

10. SURFACE DAMAGE COMPENSATION ACT. The compensation contemplated and paid to Lessor hereunder is compensation for, among other things, damages sustained by Lessor for the lost use of and access to Lessor's land, pore space (to the extent required under North Dakota law), and any other damages which are contemplated under Ch. 38-11.1 of the North Dakota Century Code (to the extent applicable).

11. MINERALS, OIL AND GAS. This Lease is not intended to grant or convey, nor does it grant or convey, any right to or obligation for Lessee to explore for or produce minerals, including Native Oil and Gas, that may exist on the Leased Premises. Lessee shall not engage in any activity or permit its Related Persons to engage in any activity that unreasonably interferes with the Lessor's or third party's (or parties') rights to the granted, leased, or reserved mineral interests. If Lessor owns hydrocarbon mineral interests in the Leased Premises and Lessee should inadvertently discover a Pool in conjunction with its efforts to explore for and develop a Reservoir for Operations, Lessee shall inform Lessor within 60 days of discovery. If Lessee determines that it will not use in conjunction with Operations a well that has encountered a Pool within the Leased Premises, Lessor shall have the option but not the obligation to buy such well at cost, provided Lessor has the ability and assumes all permits and risks and liabilities which are associated with the ownership and operation of an oil, gas or mineral well.

12. FORCE MAJEURE. Should Lessee be prevented from complying with any express or implied covenant of this Lease, from utilizing the Leased Premises for underground storage purposes by reason of scarcity of or an inability to obtain or to use equipment or material failure or breakdown of equipment, or by operation of force majeure (including, but not limited to, riot, insurrection, war (declared or not), mobilization, explosion, labor dispute, fire, flood, earthquake, storm, lightning, tsunami, backwater caused by flood, vandalism, act of the public enemy, terrorism, epidemic, pandemic (including COVID-19), civil disturbances, strike, labor disturbances, work slowdown or stoppage, blockades, sabotage, labor or material shortage, national emergency, and the amendment, adoption or repeal of or other change in, or the interpretation or application of, any applicable laws, orders, rules or regulations of governmental authority), then while so prevented, Lessee's obligation to comply with such covenant shall be suspended and this Lease shall be extended while and so long as Lessee is prevented by any such cause from utilizing the property for underground storage purposes and the time while Lessee is so prevented shall not be counted against Lessee, anything in this Lease to the contrary notwithstanding.

13. DEFAULT/TERMINATION. Lessor may not terminate the Lease for any reason whatsoever unless a Default Event has occurred and is continuing consistent with the terms of this Section 13. Any Party that fails to perform its responsibilities as listed below shall be deemed to be the "Defaulting Party," the other Party shall be deemed to be the "Non-Defaulting Party," and each event of default shall be a "Default Event." A Default Event is: (a) failure of a Party to pay any amount due and payable under this Lease, other than an amount that is subject to a good faith dispute, within thirty (30) days following receipt of written notice from Non-Defaulting Party of such failure to pay; or (b) a material violation or default of any terms of this Lease by a Party, provided the Non-Defaulting Party provides written notice of violation or default and Defaulting Party fails to substantially cure the violation or default within sixty (60) days after receipt of said notice to cure such violations or defaults. Parties acknowledge that in connection with any construction or long-term financing or other credit support provided to Lessee or its affiliates by Financing Parties, that such Financing Parties may act to cure a continuing Default Event and Lessor agrees to accept performance from any such Financing Parties so long as such Financing Parties perform in accordance with the terms of this Lease. If Lessee, its affiliates or Financing Parties, fail to substantially cure such Default Event within the applicable cure period, Lessor may terminate the Lease. Lessee may terminate the lease with thirty (30) days written notice to Lessor. Upon termination of this Lease, Lessee shall have one hundred eighty (180) days to remove, plug, and/or abandon in place all Facilities of Lessee located on the Leased Premises in accordance with applicable permit requirements or other applicable statutes, rules or regulations.

14. ASSIGNMENT. (a) Lessor shall not sell, transfer, assign or encumber the Facilities or any part of Operations, Lessee's title or Lessee's rights under this Lease. (b) Lessee has the right to sell,

assign, mortgage, pledge, transfer, use as collateral, or otherwise collaterally assign or convey all or any of its rights under this Lease, including, without limitation, an assignment by Lessee to Financing Parties. (c) In the event Lessee assigns its rights under this Lease, Lessee shall be relieved of all obligations with respect to the assigned portion arising after the date of assignment so long as notice of such assignment is provided to Lessor, and provided that Lessee shall not be relieved from any obligation in respect of any payment or other obligations that have not been satisfied or performed prior to such date of assignment. (d) This Lease shall be binding on and inure to the benefit of the successors and assignees. The assigning Party shall provide written notice of any assignment within sixty (60) days after such assignment has become effective; provided, however, that an assigning Party's failure to deliver written notice of assignment within such 60-day period shall not be deemed a breach of this Lease unless such failure is willful and intentional. Further, no change or division in Lessor's ownership of or interest in the Leased Premises or royalties shall enlarge the obligations or diminish the rights of Lessee or be binding on Lessee until after Lessee has been furnished with a written assignment or a true copy of the assignment with evidence that same has been recorded with the Oliver County Recorder's Office.

15. FINANCING. (a) Lessor acknowledges that Lessee may obtain tax equity, construction, long-term financing and other credit support from one or more Financing Parties and that Lessee intends to enter into various agreements and execute various documents relating to such financing, which documents may, among other things, assign this Lease and any related easements to a Financing Party, grant a sublease in the Leased Premises and a lease of the Facilities from such Financing Party to Lessee, grant the Financing Parties a sublease or other real property interest in Lessee's interests in and to the Leased Premises, grant a first priority security interest in Lessee's interest in the Facilities and/or this Lease and Lessee's other interests in and to the Leased Premises, including, but not limited to, any easements, rights of way or similar interests (such documents, "Financing Documents"). Lessor acknowledges notice of the foregoing and consents to the foregoing actions and Financing Documents described above.

(b) Lessor agrees, to execute, and agrees to cause any and all of Lessor's lenders to execute, such commercially reasonable subordination agreements, non-disturbance agreements, forbearance agreements, consents, estoppels, modifications of this Lease and other acknowledgements of the foregoing as Lessee or the Financing Parties may reasonably request (collectively, "Lessor Financing Consent Instruments"). Lessor acknowledges and agrees that (i) Lessee's ability to obtain financing for the construction and operation of the Facilities is dependent upon the prompt cooperation of Lessor and its lenders as contemplated by this Section 15; (ii) if Lessee is unable to close on the financing for the Facilities, the construction of the Facilities and the Commencement of Operations will not likely occur; and (iii) it is in the best interest of both Lessee and Lessor for Lessee to obtain financing from the Financing Parties as contemplated by this Section 15. Therefore, Lessor agrees to act promptly, reasonably and in good faith in connection with any request for approval and execution of all Lessor Financing Consent Instruments. The Lessor shall also reasonably cooperate with the Lessee or the Financing Party in the making of any filings required by such requesting party for regulatory compliance or in accordance with applicable laws and in the operation and maintenance of the Facilities, all solely at the expense of the Lessee.

(c) As a precondition to exercising any rights or remedies as a result of any default or alleged default by Lessee under this Lease, Lessor shall deliver a duplicate copy of the applicable notice of default to each Financing Parties concurrently with delivery of such notice to Lessee, specifying in detail the alleged default and the required remedy, provided Lessor was given notice of such Financing Parties and if no such notice of default is required to be delivered to Lessee under this Lease, Lessor may not terminate this Lease unless Lessor has delivered a notice of default to each Financing Party specifying in detail the alleged default or breach and permitting each Financing Party the opportunity to cure as provided in this Section 15(c). Each Financing Party shall have the same period after receipt of a notice of default to remedy default, or cause the same to be remedied, as is given to Lessee after Lessee's receipt of a notice

of default under this Lease, plus, in each instance, the following additional time periods: (i) ten (10) Business Days in the event of any monetary default; and (ii) sixty (60) days in the event of any non-monetary default; provided, however, that (A) such sixty (60)-day period shall be extended for an additional sixty (60) days to enable such Financing Party to complete such cure, including the time required for such Financing Party to obtain possession of the Facilities (including possession by a receiver), institute foreclosure proceedings or otherwise perfect its right to effect such cure and (B) such Financing Party shall not be required to cure those defaults which are not reasonably susceptible of being cured or performed. Lessor shall accept such performance by or at the instance of a Financing Party as if the performance had been made by Lessee.

(d) If any Lessee Default Event cannot be cured without obtaining possession of all or part of the Facilities and/or the leasehold interest created by the Lease (the "Leasehold Estate"), then any such Lessee Default Event shall nonetheless be deemed remedied if: (i) within sixty (60) days after receiving the notice of default, a Financing Party acquires possession thereof, or commences appropriate judicial or non-judicial proceedings to obtain the same; (ii) such Financing Party is prosecuting any such proceedings to completion with commercially reasonable diligence; and (iii) after gaining possession thereof, such Financing Party performs all other obligations as and when the same are due in accordance with the terms of the Lease. If a Financing Party is prohibited by any process or injunction issued by any court or by reason of any action of any court having jurisdiction over any bankruptcy or insolvency proceeding involving Lessee from commencing or prosecuting the proceedings described above, then the sixty (60)-day period specified above for commencing such proceedings shall be extended for the period of such prohibition.

(e) Financing Parties shall have no obligation or liability to the Lessor for performance of the Lessee's obligations under the Lease prior to the time the Financing Party acquires title to the Leasehold Estate. A Financing Party shall be required to perform the obligations of the Lessee under this Lease only for and during the period the Financing Party directly holds such Leasehold Estate. Any assignment pursuant to this Section 15 shall release the assignor from obligations accruing under this Lease after the date the liability is assumed by the assignee.

(f) Each Financing Party shall have the absolute right to do one, some or all of the following things: (i) assign the rights, mortgage or pledge held by Financing Party (the "Financing Party's Lien"); (ii) enforce the Financing Party's Lien; (iii) acquire title (whether by foreclosure, assignment in lieu of foreclosure or other means) to the Leasehold Estate; (iv) take possession of and operate the Facilities or any portion thereof and perform any obligations to be performed by Lessee under the Lease, or cause a receiver to be appointed to do so; (v) assign or transfer the Leasehold Estate to a third party; or (vi) exercise any rights of Lessee under this Lease. Lessor's consent shall not be required for any of the foregoing; and, upon acquisition of the Leasehold Estate by a Financing Party or any other third party who acquires the same from or on behalf of the Financing Party or any purchaser who purchases at a foreclosure sale, Lessor shall recognize the Financing Party or such other party (as the case may be) as Lessee's proper successor, and this Lease shall remain in full force and effect.

(g) If this Lease is terminated for any reason whatsoever, including a termination by Lessor on account of a Lessee Default Event, or if this Lease is rejected by a trustee of Lessee in a bankruptcy or reorganization proceeding or by Lessee as a debtor-in-possession (whether or not such rejection shall be deemed to terminate this Lease), if requested by Financing Party, Lessor shall execute a new lease (the "New Lease") for the Leased Premises with the Financing Parties (or their designee(s), if applicable) as Lessee, within thirty (30) days following the date of such request. The New Lease shall be on substantially the same terms and conditions as are in this Lease (except for any requirements or conditions satisfied by Lessee prior to the termination or rejection). Upon execution of the New Lease by Lessor, Financing Parties (or their designee, if applicable) shall pay to Lessor any and all sums owing by Lessee under this Lease that are unpaid and that would, at the time of the execution of the New Lease, be due and payable under this Lease if this Lease had not been terminated or rejected. The provisions of this Section 15(g) shall survive any termination of this Lease prior to the expiration of the Term, and any

rejection of this Lease in any bankruptcy or reorganization proceeding.

(h) Lessor consents to each Financing Party's security interest, if any, in the Facilities and waives all right of levy for rent and all claims and demands of every kind against the Facilities, such waiver to continue so long as any sum remains owing from Lessee to any Financing Parties. Lessor agrees that the Facilities shall not be subject to distraint or execution by, or to any claim of, Lessor.

16. INDEMNIFICATION; WAIVER. (a) Each Party shall indemnify, defend, and hold harmless the other Party and its Related Persons from and against any and all third-party suits, claims, or damages suffered or incurred by the indemnified Party and its Related Persons arising out of physical damage to property and physical injuries to any person, including death, caused by the indemnifying Party or its Related Persons except to the extent such claims arise out of the negligence or willful misconduct of the indemnified Party or its Related Persons. (b) Each Party shall indemnify, defend and hold harmless the other Party and its Related Persons from and against all suits, claims, or damages suffered or incurred by the indemnified Party and its Related Persons arising out of or relating to the existence at, on, above, below or near the Leased Premises of any Hazardous Substance, except to the extent deposited, spilled or otherwise caused by the indemnified Party or any of its contractors or agents, provided that Lessee shall not be obligated to indemnify Lessor with respect to any Hazardous Substance on the Leased Premises prior to the Effective Date.

17. INSURANCE. Lessee shall, at its sole cost and expense, keep and maintain in force commercial general liability insurance including broad form property damage liability, personal injury liability, and contractual liability coverage, on an "occurrence" basis, with a combined single limit, which may be effected by primary and excess coverage, of not less than Five Million Dollars (\$5,000,000.00) during the primary term, except that such limit in the Primary Term shall be instead not less than One Million Dollars (\$1,000,000.00) until such time as Lessee commences physical testing of any injection wells or other similar commercial activities, with such commercially reasonable deductibles as Lessee, in its discretion, may deem appropriate. Lessor shall be named as an additional insured in such policy but only to the extent of the liabilities specifically assumed by the Lessee under this Lease. The policy shall contain provisions by which the insurer waives any right of subrogation it may have against Lessor and shall be endorsed to provide that the insurer shall give Lessor thirty days written notice before any material modification or termination of coverage. Upon Lessor's request, Lessee shall promptly deliver certificates of such insurance to Lessor.

18. MISCELLANEOUS.

(a) **Confidentiality.** Lessor shall maintain in the strictest confidence, and shall require each of Lessor's Related Persons to hold and maintain in the strictest confidence, for the benefit of Lessee, all information pertaining to the compensation paid under this Lease, any information regarding Lessee and its business, operations on the Leased Premises or on any other lands, the capacity and suitability of the Reservoir, and any other information that is deemed proprietary or that Lessee requests or identifies to be held confidential, in each such case whether disclosed by Lessee or discovered by Lessor.

(b) **Liens.** (i) Lessee shall protect the Leased Premises from liens of every character arising from its activities on the Leased Premises, provided that Lessee may, at any time and without the consent of Lessor, encumber, hypothecate, mortgage, pledge, or collaterally assign (including by mortgage, deed of trust or personal property security instrument) all or any portion of Lessee's right, title or interest under this Lease (but not Lessor's right, title or interest in the Leased Premises), as security for the repayment of any indebtedness and/or the performance of any obligation. (ii) Lessor shall not directly or indirectly cause, create, incur, assume or allow to exist any mortgage, pledge, lien, charge, security interest, encumbrance or other claim of any nature on or with respect to the Facilities, Operations or any interest therein. Lessor shall immediately notify Lessee in writing of the existence of any such mortgage, pledge, lien, charge, security interest, encumbrance or other claim, shall promptly cause the same to be discharged and released of record without cost to Lessee, and shall indemnify the Lessee against all costs and expenses (including reasonable attorneys' fees) incurred in discharging and releasing any such

mortgage, pledge, lien, charge, security interest, encumbrance or other claim.

(c) **Warranty of Title.** Lessor represents and warrants to Lessee that Lessor is the owner in fee of the surface and subsurface pore space of the Leased Premises. Lessor hereby warrants and agrees to defend title to the Leased Premises and Lessor hereby agrees that Lessee, at its option, shall have the right to discharge any tax, mortgage, or other lien upon the Leased Premises, and in the event Lessee does so, Lessee shall be subrogated to such lien with the right to enforce the same and apply annual rental payments or any other such payments due to Lessor toward satisfying the same. At any time on or after the Effective Date, Lessee may obtain for itself and/or any Financing Party, at Lessee's expense, a policy of title insurance in a form and with exceptions acceptable to Lessee and/or such Financing Party in its sole discretion (the "Title Policies"). Lessor agrees to cooperate fully and promptly with Lessee in its efforts to obtain the Title Policies, and Lessor shall take such actions as Lessee or any Financing Party may reasonably request in connection therewith.

(d) **Conduct of Operations.** Each Party shall, at its expense, use best efforts to comply (and cause its Related Persons to comply) in all material respects with all laws applicable to its (or their) activities on the Leased Premises, provided that each Party shall have the right, in its sole discretion, to contest, by appropriate legal proceedings, the validity or applicability of any law, and the other Party shall cooperate in every reasonable way in such contest, at no out-of-pocket expense to the cooperating Party. During the Primary Term, Lessee, its agents, affiliates, servants, employees, nominees and licensees shall be entitled to: (i) apply for and obtain any necessary permits, approvals and other governmental authorizations (collectively called "Governmental Authorizations") required for the development, construction, operation and maintenance of the Project and Lessor agrees to co-operate, execute, obtain or join with Lessee in any applications or proceedings relating to the Governmental Authorizations upon Lessee's written request and at Lessee's direction, cost and expense; and (ii) apply for any approvals and permits and any zoning amendment of any area of the Leased Premises required in connection with the Project, and Lessor agrees to co-operate, execute, obtain or join with Lessee in any applications or proceedings relating to such approvals, permits and zoning amendments upon Lessee's written request and at Lessee's direction, cost and expense.

(e) **Title to Carbon Dioxide.** As between Lessor and Lessee, all right, title, interest and ownership to all Carbon Dioxide injected into any Reservoir shall belong to Lessee, as measured by corresponding Storage Fee payment to Lessor.

(f) **Hazardous Substances.** Lessee shall have no liability for any regulated hazardous substances located on the Leased Premises prior to the Effective Date or placed in, on or within the Leased Premises by Lessor or any of its Related Persons on or after the Effective Date, and nothing in this Lease shall be construed to impose upon Lessee any obligation for the removal of such regulated hazardous substances.

(g) **Interference.** Lessee shall peaceably and quietly have, hold and enjoy the Leased Premises against any person claiming by, through or under the Lessor and without disturbance by the Lessor, unless Lessee is found in default of the terms of this Lease and such default is continuing. Lessor shall not unreasonably interfere with Lessee's access to or maintenance of the Facilities or associated use of Leased Premises under this Lease; endanger the safety of Lessor, Lessee, the general public, private or personal property, or the Facilities; or install or maintain or permit to be installed or maintained vegetation, undergrowth, trees (including overhanging limbs and foliage and any trees standing which are substantially likely to fall), buildings, structures, installations, and any other obstructions which unreasonably interfere to Lessee access or use of the Facilities, Formations or Lessee's use of the Leased Premises under this Lease. Lessor shall not engage in any activity or permit its Related Persons to engage in any activity that might damage or undermine the physical integrity of any Formation or interfere with Lessee's use of the Leased Premises under this Lease, provided however that it is understood by Lessee that Lessor has no right to permit or to prohibit the exercise of any mineral rights not owned by Lessor at the time of entering into the Option to Lease between Lessor and Lessee with respect to the Leased Premises. Neither Lessee nor its agents will engage in any activity that damages existing oil, gas and

other mineral exploration and development activities occurring on the Leased Premises without first obtaining permission from the relevant mineral rights holder.

(h) **Reservations.** Lessor reserves the right to sell, lease, or otherwise dispose of any interest in the Leased Premises subject to the rights granted in this Lease and agrees that sales, leases, or other dispositions of any interest or estate in the Leased Premises shall be expressly made subject to the terms of this Lease and shall not unreasonably interfere with Lessee's rights under this Lease.

(i) **Taxes.** Lessor shall pay for all real estate taxes and other assessments levied upon the Leased Premises. Lessee shall pay any taxes, assessments, fines, fees, and other charges levied by any governmental authority against its Facilities on the Leased Premises. The Parties agree to cooperate fully to obtain any available tax refunds or abatements with respect to the Leased Premises. Lessee shall have the right to pay all taxes, assessments and other fees on behalf of Lessor and to deduct the amount so paid from other payments due to Lessor hereunder.

(j) **Amendments.** Lessee reserves the right to revise this Lease to remedy any mistakes, including correcting the names of the Parties, the legal description of the Leased Premises, or otherwise. In the event that any amendment alters the bonus and royalty payable under Section 5(a)-(b) of this Lease, the Lessee shall pay the Lessor the amount owed under the Lease as amended. Any amendments must be in writing and signed by both parties.

(k) **Remedies.** Notwithstanding anything to the contrary in this Lease, neither Party shall be liable to the other for any indirect, special, punitive, incidental or exemplary damages, whether foreseeable or not and whether arising out of or in connection with this Lease, by statute, in contract, tort, including negligence, strict liability or otherwise, and all such damages are expressly disclaimed.. This provision does not limit Lessee's obligation to indemnify Lessor for third-party suits, claims, or damages under Section 16 of this Lease.

(l) **Financial Responsibility.** Lessee will comply with all applicable law regarding financial responsibility for Carbon Dioxide storage, and will post bonds or other financial guarantees as required by the government entities.

(m) **Attorneys' Fees.** If any suit or action is filed or arbitration commenced by either Party against the other Party to enforce this Lease or otherwise with respect to the subject matter of this Lease, the prevailing party shall be entitled to recover reasonable costs and attorneys' fees incurred in investigation of related matters and in preparation for and prosecution of such suit, action, or arbitration as fixed by the arbitrator or court, and if any appeal or other form of review is taken from the decision of the arbitrator or any court, reasonable costs and attorneys' fees as fixed by the court.

(n) **Representations and Warranties.** Lessor represents and warrants to Lessee the following as of the Effective Date and covenants that throughout the Term: (i) Lessor has the full right, power and authority to grant rights, interests and license as contained in this Lease. Such grant of the right, interests and license does not violate any law, ordinance, rule or other governmental restriction applicable to the Lessor or the Leased Premises and is not inconsistent with and will not result in a breach or default under any agreement by which the Lessor is bound or that affects the Leased Premises. (ii) Neither the execution and delivery of this Lease by Lessor nor the performance by Lessor of any of its obligations under this Lease conflicts with or will result in a breach or default under any agreement or obligation to which Lessor is a party or by which Lessor or the Leased Premises is bound. (iii) All information provided by Lessor to Lessee, as it pertains to the Leased Premises' physical condition, along with Lessor's rights, interests and use of the Leased Premises, is accurate in all material respects. (iv) Lessor has no actual or constructive notice or knowledge of Hazardous Substances at, on, above, below or near the Leased Premises. (v) Each of the undersigned represents and warrants that they have the authority to execute this Lease on behalf of the Party for which they are signing.

(o) **Severability.** Should any provision of this Lease be held, in a final and unappealable decision by a court of competent jurisdiction, to be either invalid, void or unenforceable, the remaining provisions

of this Lease shall remain in full force and effect, unimpaired by the holding. If the easements or other rights under this Lease are found to be in excess of the longest duration permitted by applicable law, the term of such easements or other rights shall instead expire on the latest date permitted by applicable law.

(p) **Memorandum of Lease.** This Lease shall not be recorded in the real property records. Lessee shall cause a memorandum of this Lease to be recorded in the real property records of the county in which the Leased Premises is situated. A recorded copy of said memorandum shall be furnished to Lessor within thirty (30) days of recording.

(q) **Notices.** All notices required to be given under this Lease shall be in writing, and shall be deemed to have been given upon (a) personal delivery, (b) one (1) Business Day after being deposited with FedEx or another reliable overnight courier service, with receipt acknowledgment requested, or (c) upon receipt or refused delivery deposited in the United States mail, registered or certified mail, postage prepaid, return receipt required, and addressed to the respective Party at the addresses set forth at the beginning of this Lease, or to such other address as either Party shall from time to time designate in writing to the other Party.

(r) **No Waiver.** The failure of either Party to insist in any one or more instances upon strict performance of any of the provisions of this Lease or to take advantage of any of its rights hereunder shall not be construed as a waiver of any such provision or the relinquishment of any such rights, but the same shall continue and remain in full force and effect.

(s) **Estoppels.** Either party hereto (the "Receiving Party"), without charge, at any time and from time to time, within ten (10) Business Days after receipt of a written request by the other party hereto (the "Requesting Party"), shall deliver a written statement, duly executed, certifying to such Requesting Party, or any other person, firm or entity specified by such Requesting Party: (i) that this Lease is unmodified and in full force and effect, or if there has been any modification, that the same is in full force and effect as so modified and identifying the particulars of such modification; (ii) whether or not, to the knowledge of the Receiving Party, there are then existing any offsets or defenses in favor of such Receiving Party against enforcement of any of the terms, covenants and conditions of this Lease and, if so, specifying the particulars of same and also whether or not, to the knowledge of such Receiving Party, the Requesting Party has observed and performed all of the terms, covenants and conditions on its part to be observed and performed, and if not, specifying the particulars of same; and (iii) such other information as may be reasonably requested by the Requesting Party. Any written instrument given hereunder may be relied upon by the recipient.

(t) **Counterparts.** This Lease may be executed in any number of counterparts, each of which, when executed and delivered, shall be an original, but all of which shall collectively constitute one and the same instrument.

(u) **Governing Law.** This Lease shall be governed, interpreted, and enforced in accordance with the laws of the state of North Dakota.

(v) **Further Action.** Each Party will execute and deliver all documents, provide all information, and take or forbear from all actions as may be necessary or appropriate to achieve the purposes of this Lease, including without limitation executing a memorandum of easement and all documents required to obtain any necessary government approvals.

(w) **Entire Agreement.** This Lease, into which the attached **Exhibit A** is incorporated by reference, contains the entire agreement of the Parties. There are no other conditions, agreements, representations, warranties, or understandings, express or implied.

[Remainder of page intentionally left blank. Signature page follows.]

IN WITNESS OF THE ABOVE, Lessor and Lessee have caused this Lease to be executed and delivered by their duly authorized representatives as of the Effective Date.

LESSOR:

By: _____
Print: _____

By: _____
Print: _____

LESSEE:

MINNKOTA POWER COOPERATIVE, INC.

By: _____
Print: _____
Its: _____

Exhibit A

LEGAL DESCRIPTION OF THE PROPERTY

The Leased Premises consists of the lands located in Oliver County, North Dakota that are owned by the Lessor and generally described as follows:

For purposes of calculating the royalty payable under Section 5(b) of this Lease, the Parties stipulate that the Leased Premises consists of _____ acres.

73933018.1

APPENDIX I

**STORAGE FACILITY PERMIT REGULATORY
COMPLIANCE**

STORAGE FACILITY PERMIT REGULATORY COMPLIANCE TABLE

Permit Item	NDAC Reference	Requirement	Regulatory Summary	Storage Facility Permit (Section and Page Number; see main body for reference cited)	Figure/Table Number and Description
Pore Space Amalgamation	NDCC 38-22-06 §3 & 4 NDAC 43-05-01-08 §1 & 2	<p>NDCC 38-22-06</p> <p>3. Notice of the hearing must be given to each mineral lessee, mineral owner, and pore space owner within the storage reservoir and within one-half mile of the storage reservoir's boundaries.</p>	<p>a. An affidavit of mailing certifying that all pore space owners and lessees within the storage reservoir boundary and within one-half mile outside of its boundary have been notified of the proposed carbon dioxide storage project;</p>	<p>Minnkota Power Cooperative, Inc. (Minnkota) has identified the owners (surface and mineral); in addition, no mineral lessees or operators of mineral extraction activities are within the facility area or within one-half mile of its outside boundary. Minnkota will notify all owners of a pore space amalgamation hearing at least 45 days prior to the scheduled hearing and will provide information about the proposed CO₂ storage project and the details of the scheduled hearing. An affidavit of mailing will be provided to the North Dakota Industrial Commission (NDIC) to certify that these notifications were made.</p>	
		4. Notice of the hearing must be given to each surface owner of land overlying the storage reservoir and within one-half mile of the reservoir's boundaries.	<p>b. A map showing the extent of the pore space that will be occupied by carbon dioxide over the life of the project;</p>	<p>1.0 PORE SPACE ACCESS North Dakota law explicitly grants title of the pore space in all strata underlying the surface of lands and waters to the overlying surface estate, i.e., the surface owner owns the pore space (North Dakota Century Code [NDCC] Chapter 47-31 Subsurface Pore Space Policy). Prior to issuance of the storage facility permit (SFP), the storage operator is required by North Dakota statute for geologic storage of carbon dioxide (CO₂) to make a good faith attempt to obtain the consent of all persons who own pore space within the storage reservoir. The North Dakota Industrial Commission (NDIC) can amalgamate the nonconsenting owners' pore space into the storage reservoir if the operator can show that 1) after making a good faith attempt, it was able to obtain consent of persons who own at least 60% of the pore space in the storage reservoir and 2) NDIC finds that the nonconsenting owners will be equitably compensated for the use of the pore space.</p>	Figure 1-1. Deadwood storage facility area map.
		1. The commission shall hold a public hearing before issuing a storage facility permit. At least forty-five days prior to the hearing, the applicant shall give notice of the hearing to the following:	<p>c. A map showing the storage reservoir boundary and one-half mile outside of the storage reservoir boundary with a description of pore space ownership;</p>	<p>Amalgamation of pore space will be considered at an administrative hearing as part of the regulatory process required for consideration of the SFP application (NDCC §§ 38-22-06(3) and -06(4) and North Dakota Administrative Code [NDAC] §§ 43-05-01-08[1] and -08[2]). In connection herewith, Minnkota submits the form of storage agreement attached hereto as Appendix H which, upon final approval by NDIC, shall govern certain rights and obligations of the storage operator and the persons owning pore space within the amalgamated storage reservoir.</p>	Figure 1-1. Deadwood storage facility area map.
		a. Each operator of mineral extraction activities within the facility area and within one-half mile [0.80 kilometer] of its outside boundary;	<p>d. A map showing the storage reservoir boundary and one-half mile outside of its boundary with a description of each operator of mineral extraction activities;</p>	<p>1.1 Storage Reservoir Pore Space Minnkota Power Cooperative, Inc. (Minnkota) defines the proposed storage reservoir boundaries as the projected vertical and horizontal migration of the CO₂ plume from the start until the end of injection. The storage reservoir vertical and horizontal boundaries are identified based on the computational model output of the areal extent of the CO₂ plume volume at the end of the injection period (20 years), in which a CO₂ saturation is predicted to be greater than or equal to 5%. The model utilizes applicable geologic and reservoir engineering information and analysis as detailed in Section 2.0 and Appendix A.</p>	Figure 1-1. Deadwood storage facility area map.
		b. Each mineral lessee of record within the facility area and within one-half mile [0.80 kilometer] of its outside boundary;	<p>e. A map showing the storage reservoir boundary and one-half mile outside of its boundary with a description of each mineral lessee of record;</p>	<p>The operation inputs for the simulation scenarios assumes storage at the average designed injection rates, approximately 4.0 MMt/year injected into the Broom Creek storage reservoir for the first 15 years of operation and 3.5MMt/year for year 15 through year 20 of operation. The operation input for the Black Island–Deadwood simulation scenario assumes storage at the maximum designed injection rate of approximately 1.17 MMt/year for 20 years. These maximum rates were based on Minnkota's consideration of the planned maintenance, outage, and operating capacity of the Milton R. Young Station (MRYs) and carbon capture equipment along with the planned maintenance requirements and testing requirements of the Tundra SGS (secure geologic storage) site equipment. During Phase 1 operation of the Broom Creek storage facility, Minnkota will conduct ongoing validation and assessment of need for construction and operation of the Black Island–Deadwood.</p>	Table 1-1. Owners, Lessees, and Operators Requiring Pore Space Hearing Notification
			<p>f. A map showing the storage reservoir boundary and one-half mile outside of its boundary with a description of each surface owner of record;</p>	<p>1.1.1 Horizontal Boundaries The proposed horizontal boundaries of the storage reservoirs, including an adequate buffer area, are defined by the simulated migration of the CO₂ plume, using the actual rate of injection from the start until the end of injection. In establishing the definite boundaries of the storage facility area, Minnkota considered the characteristics and external factors influencing the operating life of the project, the opportunity for phased development of stacked storage facilities, and the coordinated operation of Broom Creek and Deadwood storage facilities if needed. The horizontal storage reservoir boundary is proposed using a 20-year injection period and was benchmarked off the maximum design life of the carbon capture equipment. The reservoir models will be updated regularly with operating data and the operator will provide evidence of the CO₂ plume migration as part of the reevaluations required under NDAC §§ 43-05-01-05.1 and 43-05-01-</p>	Table 1-2. Mineral Owners, Mineral Lessees and Operators Requiring Hearing Notification
			<p>g. A map showing the storage reservoir boundary and one-half mile outside of its boundary with a description of each owner of record of minerals.</p>		

		<p>c. Each owner of record of the surface within the facility area and one-half mile [0.80 kilometer] of its outside boundary;</p> <p>d. Each owner of record of minerals within the facility area and within one-half mile [0.80 kilometer] of its outside boundary;</p> <p>e. Each owner and each lessee of record of the pore space within the storage reservoir and within one-half mile [0.80 kilometer] of the reservoir's boundary; and</p> <p>f. Any other persons as required by the commission.</p> <p>2. The notice given by the applicant must contain:</p> <p>a. A legal description of the land within the facility area.</p> <p>b. The date, time, and place that the commission will hold a hearing on the permit application.</p> <p>c. A statement that a copy of the permit application and draft permit may be obtained from the commission.</p>		<p>11.4. These reevaluations are to occur no later than every 5 years, thus the simulation output at 5 years of operation is indicated in Figure 1-1 to exemplify the buffer existing within the proposed storage facility area, allowing safe operation as proposed and contemplated. The stacked storage operations scenario option allows for coordination of the capacity of the Black–Island Deadwood with the Broom Creek capacity and provides further assurance of the contemplated operation within the defined storage reservoir boundary.</p> <p>The simulated horizontal storage reservoir boundary results proposed for the Deadwood Formation are depicted in Figure 1-1.</p> <p>1.1.2 Vertical Boundaries The Tundra SGS site was designed using a stacked storage concept, where two storage reservoirs identified with varying vertical depths could be accessed by a common well site. A key benefit of this development approach is to minimize the surface land use impact by reducing the amount of surface facilities required for operation. Despite the significant overlap of pore space area between the Broom Creek and Deadwood reservoirs, two distinct SFPs are being requested, with the distinct vertical boundaries based upon geologic analysis and simulations which are further detailed and described in Section 2.0 of the respective SFP application supporting information.</p> <p>The applicant requests amalgamation of the injection zone pore space within the Black Island, Deadwood E-member, and Deadwood C-member Sand intervals, as identified in Section 2.0, Figure 2-3. In addition to the injection zone, the applicant requests the permitted storage facility consist of the Icebox Formation as the upper confining zone and Deadwood B member shale as the lower confining zone (Section 2.0, Figure 2-3).</p> <p>1.2 Persons Notified Minnkota will identify the owners of record (surface and mineral), pore space and mineral lessees of record, and operators of mineral extraction activities within the facility area and within 0.5 mi of its outside boundary. Minnkota will notify in accordance with NDAC § 43-05-01-08 of the SFP hearing at least 45 days prior to the scheduled hearing. An affidavit of mailing will be provided to NDIC to certify that these notifications were made.</p> <p>The identification of the owners, lessees, and operators that require notification was based on the following, recognizing that all surface owners also own the underlying pore space in accordance with North Dakota law (NDCC Chapter 47-31):</p> <ul style="list-style-type: none"> • A map showing the extent of the pore space that will be occupied by the CO2 plume over the injection period, including the storage reservoir boundary and 0.5 mi (0.8 km) outside of the storage reservoir boundary with a description of the pore space ownership, surface owner, and pore space lessees of record (Figure 1-1). • A table identifying all pore space (surface) owners, and lessees of pore space of record, their mailing addresses, and legal descriptions of their pore space landownership (Table 1-1). • A table identifying each owner of record of minerals, mineral lessees and operators of record (Table 1-2). 	
Geologic Exhibits	NDAC 43-05-01-05 §1b(1) and §1b(2)(k)	NDAC 43-05-01-05 §1b(1) and §1b(2)(k) (1) The name, description, and	a. Geologic description of the storage reservoir: Name Lithology	2.3 Storage Reservoir (injection zone) Regionally, the Black Island and Deadwood Formations are laterally extensive (Figure 2-8). The Black Island comprises high-energy shallow marine sandstone (permeable storage intervals) and shale (impermeable layers). The sandy members (C-sand and E member) of the Deadwood Formation comprise reworked quartz arenites of marginal marine environment	Figure 2-8. Areal extent of the Deadwood Formation in North Dakota (modified from Nesheim, 2012b).

		<p>average depth of the storage reservoirs; (k) Data on the depth, areal extent, thickness, mineralogy, porosity, permeability, and capillary pressure of the injection and confining zone, including facies changes based on field data, which may include geologic cores, outcrop data, seismic surveys, well logs, and names and lithologic descriptions;</p>	<p>Average depth Average thickness</p>	<p>(Figure 2-9). The Deadwood Formation unconformably overlies the Precambrian basement and is unconformably overlain by the sands of the Black Island Formation followed by the conformable Icebox Formation (Figure 2-3).</p> <p>At J-ROC1, the Deadwood C-sand member is made up of 50 ft of sandstone and is located at a depth of 9,548 ft. Across the model area, the Deadwood C-sand member varies in thickness from 40 to 88 ft, with an average thickness of 64 ft. Based on offset well data and geologic model characteristics, the Deadwood C-sand member is 100% sandstone. The Deadwood E member and Black Island Formations are made up of 69 ft of sandstone and 19 ft of dolostone and limestone at J-ROC1 and are located at a depth of 9,283 ft. Across the project area, the Deadwood E member varies in thickness from 0 to 139 ft, with an average thickness of 81 ft. The Black Island Formation varies in thickness from 14 to 77 ft, with an average of 36 ft. Based on offset well data and geologic model characteristics, the net reservoir thickness within the project area ranges from 63 to 287 ft, with an average of 165 ft (Figure 2-10).</p> <p>The well log signatures for the Black Island and Deadwood storage complex are consistent and predictable across the project area. The following are the correlation definitions used to indicate the reservoir and confining zones (Figure 2-11):</p> <ul style="list-style-type: none"> • The Icebox Formation is indicated at the transitions between a moderate GR, higher resistivity, low neutron, high density, and moderate compressional sonic for the base of the Roughlock Formation to the high GR, low resistivity, high neutron, high density, and high compressional sonic. The Icebox Formation is correlative across the project area. • The Black Island Formation is indicated by the transition from the Icebox Formation to a relatively low GR, low neutron, high density, and low compressional sonic. The Black Island has interbedded high-GR and moderate-resistivity sections. • The Deadwood Formation (Deadwood E member) is indicated by a transition from the base high GR signature of the Black Island Formation to a low GR signature, lower neutron, higher density, and lower compressional sonic. The Deadwood E thins from west to east across the project area. • The Deadwood D member (base of Deadwood E member) is indicated by a transition to moderate to higher GR from top to base, higher resistivity, low neutron, high density, and low to higher compressional sonic from top to base. • The Deadwood C member is the transition between the high GR of the Deadwood D member and moderate GR, higher resistivity, low neutron, high density, and low compressional sonic. The Deadwood C-sand member at the base of the Deadwood C member is indicated by a section of low GR (10 API), low resistivity, moderate neutron, moderate density, and moderate compressional sonic. • The Deadwood B member (base of Deadwood C-sand member) is indicated by the transition from a low GR signature of the Deadwood C-sand member to a high GR, higher resistivity, low neutron, high density, and higher compressional sonic. • The Deadwood B member shale unit is indicated by a higher GR, moderate resistivity, higher neutron, moderate density, and high compressional sonic. This unit is contained within the Deadwood B member and can be correlated across the project area. • The Precambrian basement is indicated by a change from low to relatively high GR, low-to-moderate resistivity, and a lower compressional sonic character that can be correlated across the project area. <p>Seismic data collected as part of site characterization efforts (Figure 2-6) were used to reinforce structural correlation and thickness estimations of the storage reservoir. The combined structural correlation and analyses indicate that there should be few-to-no major reservoir stratigraphic discontinuities near J-LOC1 and J-ROC1 (Figures 2-12a and 2-12b). The Deadwood E member pinches out 12.5 mi to the east of the J-ROC1 site. A structure map of the Deadwood and Black Island Formations shows no detectable features (e.g., folds, domes, or fault traps) with associated spill points in the project area (Figure 2-13).</p> <p><u>For additional information, go to Section 2.3 of the Tundra SGS SFP.</u></p>	<p>Figure 2-9. Type log showing the interpreted Deadwood members within the Williston Basin (Lefever and others, 1987).</p> <p>Figure 2-10. Isopach map of the Black Island and Deadwood Formations in the simulation model extent.</p> <p>Figure 2-11. Well log display of the interpreted lithologies of the Roughlock, Icebox, Black Island, Deadwood, and Precambrian in J-ROC1.</p> <p>Figure 2-12a. Regional well log stratigraphic cross sections of the Roughlock, Icebox, Black Island, and Deadwood Formations and the Precambrian basement flattened on the top of the Precambrian basement. Logs displayed in tracks from left to right are 1) GR (green) and caliper (red), 2) delta time (blue), and 3) interpreted lithology log.</p> <p>Figure 2-12b. Regional well log cross sections showing the structure of the Roughlock, Icebox, Black Island, and Deadwood Formations and the Precambrian basement. Logs displayed in tracks from left to right are 1) GR (green) and caliper (red) and 2) delta time (blue).</p> <p>Figure 2-13. Structure map of the Black Island and Deadwood Formations across the simulation model extent.</p> <p>Table 2-5. Description of CO₂ Storage Reservoir (injection zone) at the J-LOC1 Well</p> <p>Figure 2-14. Cross section of the Tundra SGS CO₂ storage complex from the geologic model showing lithofacies distribution in the Deadwood Formation. Depths are referenced to mean sea level.</p> <p>Figure 2-15. Vertical distribution of core-derived porosity and permeability values in the Tundra SGS CO₂ storage complex.</p> <p>Table 2-6. Deadwood Microfracture Results from J-LOC1</p>
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				<p>Table 2-1. Formations Comprising the Tundra SGS CO₂ Storage Complex</p> <table border="1"> <thead> <tr> <th rowspan="2">Formation</th> <th rowspan="2">Purpose</th> <th colspan="2">Average Depth</th> <th rowspan="2">Lithology</th> </tr> <tr> <th>Average Thickness at Tundra SGS Site, ft</th> <th>Tundra SGS Site, ft TVD</th> </tr> </thead> <tbody> <tr> <td>Icebox</td> <td>Upper confining zone</td> <td>118 (58 to 176)</td> <td>9,308</td> <td>Shale</td> </tr> <tr> <td>Black Island and Deadwood E member</td> <td>Storage reservoir (i.e., injection zone)</td> <td>118 (35 to 202)</td> <td>9,427</td> <td>Sandstone, shale, dolostone, limestone</td> </tr> <tr> <td>Deadwood C member sand</td> <td>Storage reservoir (i.e., injection zone)</td> <td>64 (40 to 88)</td> <td>9,773</td> <td>Sandstone</td> </tr> <tr> <td>Deadwood B member shale</td> <td>Lower confining zone</td> <td>34 (20 to 49)</td> <td>9,791</td> <td>Shale</td> </tr> </tbody> </table>	Formation	Purpose	Average Depth		Lithology	Average Thickness at Tundra SGS Site, ft	Tundra SGS Site, ft TVD	Icebox	Upper confining zone	118 (58 to 176)	9,308	Shale	Black Island and Deadwood E member	Storage reservoir (i.e., injection zone)	118 (35 to 202)	9,427	Sandstone, shale, dolostone, limestone	Deadwood C member sand	Storage reservoir (i.e., injection zone)	64 (40 to 88)	9,773	Sandstone	Deadwood B member shale	Lower confining zone	34 (20 to 49)	9,791	Shale	
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The sandy members (C-sand and E member) of the Deadwood Formation comprise reworked quartz arenites of marginal marine environment (Figure 2-9). The Deadwood Formation unconformably overlies the Precambrian basement and is unconformably overlain by the sands of the Black Island Formation followed by the conformable Icebox Formation (Figure 2-3).</p> <p>At J-ROC1, the Deadwood C-sand member is made up of 50 ft of sandstone and is located at a depth of 9,548 ft. Across the model area, the Deadwood C-sand member varies in thickness from 40 to 88 ft, with an average thickness of 64 ft. Based on offset well data and geologic model characteristics, the Deadwood C-sand member is 100% sandstone. The Deadwood E member and Black Island Formations are made up of 69 ft of sandstone and 19 ft of dolostone and limestone at J-ROC1 and are located at a depth of 9,283 ft. Across the project area, the Deadwood E member varies in thickness from 0 to 139 ft, with an average thickness of 81 ft. 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The Deadwood C-sand member at the base of the Deadwood C member is indicated by a section of low GR (10 API), low resistivity, moderate neutron, moderate density, and moderate compressional sonic. • The Deadwood B member (base of Deadwood C-sand member) is indicated by the transition from a low GR signature of the Deadwood C-sand member to a high GR, higher resistivity, low neutron, high density, and higher compressional sonic. 	<p>Figure 2-8. Areal extent of the Deadwood Formation in North Dakota (modified from Nesheim, 2012b).</p> <p>Figure 2-9. Type log showing the interpreted Deadwood members within the Williston Basin (Lefever and others, 1987).</p> <p>Figure 2-10. Isopach map of the Black Island and Deadwood Formations in the simulation model extent.</p> <p>Figure 2-11. Well log display of the interpreted lithologies of the Roughlock, Icebox, Black Island, Deadwood, and Precambrian in J-ROC1.</p> <p>Figure 2-12a. Regional well log stratigraphic cross sections of the Roughlock, Icebox, Black Island, and Deadwood Formations and the Precambrian basement flattened on the top of the Precambrian basement. Logs displayed in tracks from left to right are 1) GR (green) and caliper (red), 2) delta time (blue), and 3) interpreted lithology log.</p> <p>Figure 2-12b. Regional well log cross sections showing the structure of the Roughlock, Icebox, Black Island, and Deadwood Formations and the Precambrian basement. Logs displayed in tracks from left to right are 1) GR (green) and caliper (red) and 2) delta time (blue).</p> <p>Figure 2-13. Structure map of the Black Island and Deadwood Formations across the simulation model extent.</p> <p>Table 2-5. Description of CO₂ Storage Reservoir (injection zone) at the J-LOC1 Well</p>																											

- The Deadwood B member shale unit is indicated by a higher GR, moderate resistivity, higher neutron, moderate density, and high compressional sonic. This unit is contained within the Deadwood B member and can be correlated across the project area.
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Seismic data collected as part of site characterization efforts (Figure 2-6) were used to reinforce structural correlation and thickness estimations of the storage reservoir. The combined structural correlation and analyses indicate that there should be few-to-no major reservoir stratigraphic discontinuities near J-LOC1 and J-ROC1 (Figures 2-12a and 2-12b). The Deadwood E member pinches out 12.5 mi to the east of the J-ROC1 site. A structure map of the Deadwood and Black Island Formations shows no detectable features (e.g., folds, domes, or fault traps) with associated spill points in the project area (Figure 2-13).

For additional information, go to section 2.3 of the Tundra SGS SFP.

Table 2-5. Description of CO₂ Storage Reservoir (injection zone) at the J-LOC1 Well

Injection Zone Properties			
Property	Description		
Formation Name	Black Island, Deadwood E member, and Deadwood C-sand member		
Lithology	Sandstone, dolostone, limestone		
Formation Top Depth, ft	9782.2, 9820.9, and 10,077.4		
Thickness, ft	38.9, 92.3, and 60.9		
Capillary Entry Pressure (CO ₂ /brine), psi	0.16		
Geologic Properties			
Formation	Property	Laboratory Analysis	Model Property Distribution
Black Island (sandstone)	Porosity, %*	8.0 (3.4–10.3)	5.6 (1.1–14.8)
	Permeability, mD**	3.7 (0.0019–157)	0.805 (<0.0001–96.0)
Deadwood E Member (sandstone)	Porosity, %	10 (6.85–14.43)	7.0 (0–17.7)
	Permeability, mD	5.63 (0.0325–2,060)	3.88 (<0.0001–4549.2)
Deadwood C-Sand Member	Porosity, %	7.6 (1.01–14.69)	7.6 (0.3–17.2)
	Permeability, mD	11 (0.0018–1140)	7.03 (<0.0001–830.3)

Figure 2-14. Cross section of the Tundra SGS CO₂ storage complex from the geologic model showing lithofacies distribution in the Deadwood Formation. Depths are referenced to mean sea level.

Figure 2-15. Vertical distribution of core-derived porosity and permeability values in the Tundra SGS CO₂ storage complex.

Table 2-6. Deadwood Microfracture Results from J-LOC1

Figure 2-16. J-LOC1 Deadwood Formation MDT microfracture in situ stress pump cycle graph at 9,885.1 ft.

Figure 2-17. Step rate test data from the Deadwood Formation with no fracture opening pressure observed (courtesy of GeothermEx, a Schlumberger Company). The x-axis is injection rate in bpm while the y-axis is bottomhole injection pressure in psi.

Figure 2-18. GeothermEx interpretation of the Deadwood Formation pressure fall-off test using Saphir – Kappa (courtesy of GeothermEx, a Schlumberger Company).

Figure 2-19. Deadwood well test summary of J-LOC1 well (modified from Schlumberger’s presentation).

Table 2-7. J-LOC1 Deadwood Formation Test Summary

Figure 2-20. Laboratory-derived mineralogic characteristics of the Black Island and Deadwood Formations.

Figure 2-21a. XRF data from the Black Island Formation from J-LOC1.

Figure 2-21b. XRF data from the Upper Deadwood Formation, including the C, D, and E members from J-LOC1.

Table 2-8. XRD Results for JLOC-1 Deadwood Formation Core Samples

Table 2-9. Deadwood Formation Water Ionic Composition, expressed as molality

Figure 2-22. The upper graph shows cumulative injection vs. time. There is an increase in injection due to geochemical

			<p>2.3.1 J-LOC1 Injectivity Tests The J-LOC1 formation well testing was performed specifically to characterize the injectivity and obtain the breakdown pressure of the Deadwood Formation in December 2020. The well testing consisted of step rate test, extended injection test, and pressure fall-off test. The well was perforated from 9,880 to 9,890 ft with 4 shots per foot (spf) and 90° phasing. To record the bottomhole pressure, a downhole memory gauge was installed at a depth of 9,855 ft. The well test data were interpreted by GeothermEx, a Schlumberger Company.</p> <p>The step rate test was performed with a total of ten injection rates. The initial injection rate was 2.00 barrels per minute (bpm), and the final injection rate was 10.5 bpm. From the step rate test evaluation, no definitive analysis can be concluded from this test, but injection at the higher rate was below fracture opening pressure. Figure 2-17 provides the step rate test data of the Deadwood Formation.</p> <p>A 12-hour extended injection rate was performed at a constant rate of 4.5 bpm followed by a 24-hour pressure fall-off test. The pressure fall-off data interpretation showed a permeability of 1,621 mD, with reservoir pressure of 4,521 psi. There was no lateral boundary observed from the pressure fall-off test within the radius of investigation of 9,183 ft, as shown in Figures 2-18 and 2-19. The Deadwood Formation well testing is summarized in Table 2-7.</p> <p>2.3.2 Mineralogy The combined interpretation of core, well logs, and thin sections shows that the Deadwood Formation is composed of fine- to medium-grained sandstone and several interbeds of carbonates (dolostone and limestone). Seventy-eight depth intervals representing nearly 274 ft of the Deadwood Formation were sampled for thin-section creation, XRD mineralogical determination, and XRF bulk chemical analysis. For the assessment below, thin sections and XRD provided an independent confirmation of the mineralogical constituents of the Deadwood Formation.</p> <p>Thin-section analysis of the sandstone intervals shows that quartz (85%) is the dominant mineral. Throughout these intervals are minor occurrences of feldspar (5%), dolomite (5%), and calcite as cements (5%). Where present, calcite and dolomite are crystallized between quartz grains and obstruct the intercrystalline porosity. The contact between grains is long (straight) to tangential. The porosity due to quartz and feldspar dissolution ranges from 5% to 14%.</p> <p>Four distinct carbonate intervals are notable. The first is the presence of a fine- to medium-grained dolostone (80%), with quartz of variable size and shape (10%) and calcite (10%) present. The porosity is not well-developed, averaging 5%. Diagenesis is expressed by dolomitization of the original calcite grains and dissolution of quartz grains. Fossils are not present in this interval. In the second occurrence of carbonate, the texture becomes coarse and more fossil-rich, comprising fine-grained limestone (80%), dolomite 10%, and quartz (10%). Diagenesis is expressed by dolomitization of the original calcite grains. The porosity is mainly fracture-related and averages 2%.</p> <p>XRD data from the samples supported facies interpretations from core descriptions and thin-section analysis. The Deadwood Formation core primarily comprises quartz, feldspar, dolomite, calcite, anhydrite, clay, and iron oxides (Figure 2-20).</p> <p>XRF data are shown in Figure 2-21a and 2-21b for the Black Island and Upper Deadwood Formations. As shown, the majority of the Upper Deadwood sandstone, calcite, and dolomite intervals are confirmed through the high percentages of SiO₂, CaO, and MgO. The presence of certain percentages of CaO and SO₃ at 10,077 ft indicates a presence of anhydrite as cement. The formation shows very little clay, with a range of 0.5% to 10% being the highest detected.</p> <p>2.3.3 Mechanism of Geologic Confinement For Tundra SGS, the initial mechanism for geologic confinement of CO₂ injected into the Deadwood Formation will be the cap rock (Icebox interval), which will contain the initially buoyant CO₂ under the effects of relative permeability and capillary pressure. Lateral movement of the injected CO₂ will be restricted by residual gas trapping (relative permeability) and solubility trapping (dissolution of the CO₂ into the native formation brine), confining the CO₂ within the proposed storage reservoir, as identified in Figure 2-3. After the injected CO₂ becomes dissolved in the formation brine, the brine density will increase. This higher-density brine will ultimately sink in the storage formation (convective mixing). Over a much longer period (>100 years), mineralization of the injected CO₂ will ensure long-term, permanent geologic confinement. Injected CO₂ is not expected to adsorb to any of the mineral constituents of the target formation; therefore, this process is not considered to be a viable trapping mechanism in this project. Adsorption of CO₂ is a trapping mechanism notable in the storage of CO₂ in deep unminable coal seams.</p>	<p>reactions. The lower graph shows wellhead injection pressure for the geochemistry case is slightly lower than for the injection case without geochemistry.</p> <p>Figure 2-23. Geochemistry case simulation results after 20 years of injection showing the distribution of CO₂ molality. Upper images are west–east and north–south cross sections. Lower image is a planar view of Simulation Layer 8.</p> <p>Figure 2-24. Geochemistry case simulation results after 20 years of injection showing the pH of formation brine.</p> <p>Figure 2-25. Dissolution and precipitation quantities of reservoir minerals due to CO₂ injection. Dissolution of illite and anhydrite with precipitation of calcite, quartz, and dolomite was observed. K-feldspar dissolves during the injection period but slowly begins to reprecipitate after injection.</p> <p>Figure 2-26. Molar distribution of illite, the most prominent dissolved mineral at the end of the injection period, shown in green. Compare to the molar CO₂ distribution in Figure 2-23.</p> <p>Figure 2-27. Molar distribution of calcite, the most prominent precipitated mineral at the end of the injection period. Compare to the molar CO₂ distribution in Figure 2-23.</p> <p>Figure 2-28. Change in porosity due to net geochemical dissolution after the 20-year injection period. Maximum porosity change is less than 0.1%. Compare to the molar CO₂ distribution in Figure 2-22.</p>
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2.3.4 Geochemical Information of Injection Zone

Geochemical simulation has been performed to calculate the effects of introducing the CO₂ stream into the injection zone. The effects have been found to be minor and not threatening to the geologic integrity of the storage system.

The injection zone, the Upper Deadwood sands and Black Island Formation, was investigated using the geochemical analysis option available in the Computer Modelling Group Ltd. (CMG) compositional simulation software package GEM. GEM is also the primary simulation software used for evaluation of the reservoir's dynamic behavior resulting from the expected CO₂ injection. The project's injection scenario was rerun with the geochemical analysis option included, and the differences were compared to the scenario that was run without the geochemical option included. Geochemical alteration effects were seen in the geochemistry case, as described below. However, these effects were not significant enough to cause meaningful change to storage reservoir performance or mechanical properties of the storage formation.

The geochemistry case was constructed using the injection case simulation inputs and assumptions as well as honoring the average mineralogical composition of the Deadwood Formation rock materials (94% of bulk reservoir volume) and average formation brine composition (6% of bulk reservoir volume). XRD data from the JLOC-1 well core samples were used to inform the mineralogical composition of the Deadwood Formation used in the geochemical modeling (Table 2-8). The ionic composition of the formation water is listed in Table 2-9. The injection stream composition remained the same as the injection case simulation, assumed as 100% CO₂. The injection stream is expected to be 99.9% CO₂. The other constituents represent 0.1% in the stream and likely include nitrogen (N₂) and water vapor (H₂O). However, 100% CO₂ was assumed for computational efficiency in the geochemical simulation to investigate rock and fluid interaction in the saline storage formation. N₂ is known to be an inert gas, and water is already in the saline storage formation and will have little to no impact on the geochemical reactions. In the injection stream, argon (Ar) and oxygen vapor (O₂) may also be present but in a negligible amount that would have no impact on geochemical reactions in the storage formation. The geochemistry case was run for the 20-year injection period followed by 94 years of postinjection shutdown and monitoring.

Figure 2-22 shows that reservoir performance results for the two cases are slightly different. As a result of geochemical reactions in the reservoir, there is an approximately 8% increase in cumulative injection potential. Wellhead injection pressure is slightly lower for the geochemistry case. Figure 2-23 shows the concentration of CO₂, in molality, in the reservoir after 20 years of injection. The pH of the reservoir brine changes in the vicinity of the CO₂ accumulation, as shown in Figure 2-24. The pH of the Deadwood native brine is 5.7 whereas the fluid pH declines to approximately 4.0 in the CO₂-flooded areas.

Figure 2-25 shows the mass of mineral dissolution and precipitation due to geochemical reactions in the model. Illite is the most prominent dissolution mineral, followed by anhydrite. Illite and anhydrite dissolution slows after Year 2042, the year in which injection ends. K-feldspar dissolves during the injection period but slowly begins to reprecipitate in the near-wellbore areas after injection. Calcite, quartz, and dolomite are the primary precipitation minerals. There is a small amount of net dissolution during the simulation period as somewhat larger quantities of minerals are dissolved rather than precipitated. Slow net dissolution continues after the injection period. Figures 2-26 and 2-27 provide an indication of the change in distribution of the mineral that has experienced the most dissolution (illite) and the mineral that has experienced the most precipitation (calcite), respectively. Considering the apparent net dissolution of minerals in the system, as indicated in Figure 2-25, there is an associated net increase in porosity of the affected area, as shown in Figure 2-28. However, the porosity change is small, less than 0.1% porosity units, equating to a maximum increase in average porosity from 6% to 6.1% after the 20-year injection period.

Results of the simulation show that geochemical processes will be at work in the Deadwood Formation during and after CO₂ injection. Mineral dissolution and some reprecipitation are expected to occur during the simulated time span of 114 years. Fluid pH will decrease in the area of the CO₂ accumulation from 5.7 to approximately 4.0, and there will be a slight net increase in system porosity. However, these changes create relatively small changes in reservoir performance parameters such as injection rate or wellhead injection pressure.

				<p style="text-align: center;">Table 2-8. XRD Results for JLOC-1 Deadwood Formation Core Samples</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th style="text-align: left;">Mineral Data</th> <th style="text-align: center;">Average %</th> </tr> </thead> <tbody> <tr> <td>Calcite</td> <td style="text-align: center;">25.85</td> </tr> <tr> <td>Dolomite</td> <td style="text-align: center;">12.78</td> </tr> <tr> <td>Quartz</td> <td style="text-align: center;">32.94</td> </tr> <tr> <td>Illite</td> <td style="text-align: center;">4.7</td> </tr> <tr> <td>K-Feldspar</td> <td style="text-align: center;">8.54</td> </tr> <tr> <td>Anhydrite</td> <td style="text-align: center;">5.18</td> </tr> <tr> <td>Ankerite</td> <td style="text-align: center;">3.97</td> </tr> <tr> <td>Other</td> <td style="text-align: center;">6.04</td> </tr> </tbody> </table>	Mineral Data	Average %	Calcite	25.85	Dolomite	12.78	Quartz	32.94	Illite	4.7	K-Feldspar	8.54	Anhydrite	5.18	Ankerite	3.97	Other	6.04										
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			<p>c. Data on the confining zone and source of the data which may include geologic cores, outcrop data, seismic surveys, and well logs:</p> <ul style="list-style-type: none"> Depth Areal extent Thickness Mineralogy Porosity Permeability Capillary pressure Facies changes 	<p>2.4 Confining Zones The confining zones for the Deadwood and Black Island Formations are the overlying Icebox Formation and underlying Deadwood B member shale (Figure 2-3, Table 2-10). All three units, the Icebox Formation, Deadwood B member shale, and Precambrian basement, consist of impermeable rock layers.</p> <p style="text-align: center;">Table 2-10. Properties of Upper and Lower Confining Zones at the J-LOC1 Well</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th style="text-align: left;">Confining Zone Properties</th> <th style="text-align: center;">Upper Confining Zone</th> <th style="text-align: center;">Lower Confining Zone</th> </tr> </thead> <tbody> <tr> <td>Formation Name</td> <td style="text-align: center;">Icebox</td> <td style="text-align: center;">Deadwood B member shale</td> </tr> <tr> <td>Lithology</td> <td style="text-align: center;">Shale</td> <td style="text-align: center;">Shale</td> </tr> <tr> <td>Formation Top Depth, ft</td> <td style="text-align: center;">9,308</td> <td style="text-align: center;">9,791</td> </tr> <tr> <td>Thickness, ft</td> <td style="text-align: center;">118</td> <td style="text-align: center;">34</td> </tr> <tr> <td>Porosity, % (core data)*</td> <td style="text-align: center;">3.6***</td> <td style="text-align: center;">2.0</td> </tr> <tr> <td>Permeability, mD (core data)**</td> <td style="text-align: center;">0.00002***</td> <td style="text-align: center;">0.0103</td> </tr> <tr> <td>Capillary Entry Pressure (CO₂/brine), psi</td> <td style="text-align: center;">845</td> <td style="text-align: center;">176****</td> </tr> <tr> <td>Depth Below Lowest Identified USDW, ft</td> <td style="text-align: center;">8,097</td> <td style="text-align: center;">8,580</td> </tr> </tbody> </table> <p>2.4.1 Upper Confining Zone In the Tundra SGS area, the Icebox consists of shale. This upper confining zone is laterally extensive across the project area (Figures 2-29 and 2-30) 9,308 ft below the land surface and 118 ft thick at the Tundra SGS site (Table 2-10 and Figure 2-31). The upper confining zone has sufficient areal extent and integrity to contain the injected CO₂. The upper confining zone is free of transmissive faults and fractures (Section 2.5). The contact between the underlying sandstone of the Black Island Formation is conformable and can be correlated across the project area. The transition from the Icebox to the Black Island is indicated by a relatively low GR, low neutron, high density, and low compressional sonic across the contact (Figure 2-32).</p> <p>Microfracture in situ stress tests were performed using the MDT tool in the J-LOC1 wellbore. Microfracture stress tests were attempted in the J-ROC1 well; however, because of extremely unstable wellbore conditions, the MDT stress tool run was not performed after a near loss of the tool in the wellbore.</p> <p>For the J-LOC1 well, in the Icebox Formation at 9,749.5 and 9,751.2 ft, the MDT tool was unable to cause a breakdown in the formation with an applied maximum injection pressure of 10,984.9 and 10,867.24 psi, respectively</p>	Confining Zone Properties	Upper Confining Zone	Lower Confining Zone	Formation Name	Icebox	Deadwood B member shale	Lithology	Shale	Shale	Formation Top Depth, ft	9,308	9,791	Thickness, ft	118	34	Porosity, % (core data)*	3.6***	2.0	Permeability, mD (core data)**	0.00002***	0.0103	Capillary Entry Pressure (CO ₂ /brine), psi	845	176****	Depth Below Lowest Identified USDW, ft	8,097	8,580	<p>Table 2-10. Properties of Upper and Lower Confining Zones at the J-LOC1 Well</p> <p>Figure 2-29. Areal extent of the Icebox Formation in western North Dakota (modified from Nesheim, 2012a).</p> <p>Figure 2-30. Structure map of the upper confining zone across the simulation model extent.</p> <p>Figure 2-31. Isopach map of the upper confining zone across the simulation model extent.</p> <p>Figure 2-32. Well log display of the upper confining zone at the J-ROC1 well.</p> <p>Figure 2-33. J-LOC1 Icebox Formation MDT microfracture in situ stress test pump cycle graph at 9,749.5 ft.</p> <p>Figure 2-34. J-LOC1 Icebox Formation MDT microfracture in situ stress test pump cycle graph at 9,751.2 ft.</p> <p>Table 2-11. Icebox Core Sample Porosity and Permeability from J-LOC1</p> <p>Table 2-12. XRF Data for the Icebox Formation from the J-LOC1 Well</p> <p>Table 2-13. Mineral Composition of the Icebox Formation Derived from XRD Analysis of JLOC-1 Core Samples (9773 ft MD)</p> <p>Table 2-14. Formation Water Chemistry from Deadwood Formation Fluid Samples from JLOC-1</p>
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			<p>(Figures 2-33 and 2-34). The maximum injection pressure was limited by the dual-packer mechanical specifications having a set maximum differential pressure rating between the upper packer and hydrostatic pressure of 5,500 psi; see Appendix D, “Schlumberger Dual-Packer Module.” The inability to break down the Icebox Formation at the two depths indicated that the formation is very tight competent and exhibits sufficient geologic integrity to contain the injected CO₂ stream.</p> <p>The Icebox Formation was not suitable to collect competent core samples from the J-LOC1 well core for the purposes of porosity and permeability laboratory tests; the samples would crush in the equipment. The formation was found to be tight, and porosity and permeability estimates were derived from HPMI testing for one sample (Table 2-11). The lithology of the cored sections of the Icebox Formation is primarily shale, with minor pyrite.</p> <p><i>2.4.1.1 Mineralogy</i> Thin-section investigation shows that the Icebox Formation is primarily shale. Thin sections were created from the base of the Icebox and the shales present in the Black Island Formation. The shales present in the Black Island Formation have characteristics similar to the shales of the Icebox Formation. The mineral components present are clay, quartz, feldspar, and iron oxides. The quartz grains are always surrounded by a clay matrix. The porosity and permeability measurements could not be performed because of the fissility of the rock. The porosity was estimated from HPMI analysis and equaled 3.6%. Log interpretations (Figure 2-31) and visual inspection of the collected core validate consistent mineral assemblage within the Icebox and Black Island Formations.</p> <p>XRD data from the J-LOC1 well core supported facies interpretations from core descriptions and thin-section analysis. The Icebox Formation comprises clay, quartz, feldspar, and iron oxides.</p> <p>XRF analysis of the Icebox Formation identified the major chemical constituents to be dominated by SiO₂ (53%), SO₃ (1.6%), CaO (0.26%), Al₂O₃ (24%), and MgO (1.9%), correlating well with the silicate- and aluminum-rich mineralogy determined by XRD (Table 2-12). This correlates with XRD, core description, and thin-section analysis.</p> <p><i>2.4.1.2 Geochemical Interaction</i> Geochemical simulation using PHREEQC geochemical software was performed to calculate the potential effects of injected CO₂ on the Icebox Formation, the primary confining zone for the Deadwood Formation. A vertically oriented 1D simulation was created using a stack of 1-meter grid cells where the formation was exposed to CO₂ at the bottom boundary of the simulation and allowed to enter the system by molecular diffusion processes. The results were calculated at grid cell centers located at 0.5, 1.5, and 2.5 meters above the cap rock–CO₂ exposure boundary. The mineralogical composition of the Icebox was honored (Table 2-13). The formation brine composition was assumed to be the same as the known composition from the Deadwood injection zone below (Table 2-14). The injection stream composition was as described by Minnkota Power Cooperative (Minnkota) (Table 2-15). Three different exposure levels, expressed in moles per year, of the CO₂ stream to the cap rock (1.15, 2.3, and 4.5 moles/yr) were used. These values are considerably higher than the expected actual exposure levels. This overestimate was done to ensure that the degree and pace of geochemical change would not be underestimated. These three simulations were run for 45 years to represent 20 years of injection plus 25 years postinjection. The simulations were performed at reservoir pressure and temperature conditions.</p> <p>The results showed relatively minor geochemical processes at work. Figures 2-35, 2-36, and 2-37 show results from the most extreme exposure case. Figure 2-35 shows change in fluid pH over time as CO₂ enters the system. For the cell at the CO₂ interface, C1, the pH declines to and stabilizes at a level of 4.9. For the cell occupying the space 1 to 2 meters into the cap rock, C2, the pH only begins to change after Year 8. The pH is unaffected in Cell C3. Figure 2-36 shows change in mineral dissolution and precipitation in grams per cubic meter of rock. Dashed lines are for Cell C1, solid lines that are seen in the figure are from Cell C2, 1.0 to 2.0 meters into the cap rock. Any effects in Cell C3 are too small to represent at this scale. In Cell C1, K-feldspar is the primary dissolution mineral, which is primarily replaced by precipitation of illite, quartz, and montmorillonite. Similar, but lesser, effects are seen in Cell C2. Figure 2-37 shows change in porosity of the Icebox cap rock. During an initial model stabilization period, Cell C1 experiences an increase in porosity due to K-feldspar dissolution. However, the porosity gradually returns to its initial condition by Year 10. As the porosity scale shows, these changes are small, less than 0.0013 porosity units. Cells C2 and C3 experience no significant change in porosity during the 45 years of the simulation. The small net porosity changes from dissolution and precipitation in Cells C1 and C2, with essentially zero observed effect on Cell C3, suggest that geochemical change from exposure to CO₂ is very minor and will not cause substantive deterioration of the Icebox cap rock.</p>	<p>Table 2-15. Injection Stream Composition</p> <p>Figure 2-35. Change in fluid pH vs. time. Red line shows pH for the center of Cell C1 at 0.5 meters above the base of the Icebox cap rock. Yellow line shows Cell C2 at 1.5 meters above the cap rock base. Green line shows Cell C3 at 2.5 meters above the cap rock base.</p> <p>Figure 2-36. Dissolution and precipitation of minerals in the Icebox cap rock. Dashed lines show results calculated for Cell C1 at 0.5 meters above the cap rock base. Solid lines show results for Cell C2 at 1.5 meters above the cap rock base. Results from Cell C3 at 2.5 meters above the caprock base are not shown as they are too small to be seen at this scale.</p> <p>Figure 2-37. Change in percent porosity of the Icebox cap rock. Red line shows porosity change calculated for Cell C1 at 0.5 meters above the cap rock base. Yellow line shows Cell C2 at 1.5 meters above the cap rock base. Green line shows Cell C3 at 2.5 meters above the cap rock base. Long-term change in porosity is minimal.</p> <p>Table 2-16. Description of Zones of Confinement above the Immediate Upper Confining Zone (data based on the J-ROC1 well)</p> <p>Figure 2-38. Isopach map of the interval between the top of the Black Island Formation and the top of the Swift Formation. This interval represents the primary and secondary confinement zones.</p> <p>Figure 2-39. Isopach map of the interval between the top of the Inyan Kara Formation and the top of the Pierre Formation. This interval represents the tertiary confinement zone.</p> <p>Figure 2-40. Structure map of the Deadwood B member shale across the greater Tundra SGS area.</p> <p>Figure 2-41. Isopach map of the Deadwood B member shale across the Tundra SGS area.</p> <p>Table 2-17. Deadwood B Member Shale Core Sample Porosity and Permeability from J-LOC1</p>
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2.4.2 Additional Overlying Confining Zones

Several other formations provide additional confinement above the Icebox. Impermeable rocks above the primary seal include the Roughlock Formation and the Red River D member, which make up the first additional group of confining formations (Table 2-16). Together with the Icebox, these formations are 612 ft thick and will isolate the Deadwood/Black Island Formations fluids from migrating upward into the next permeable interval, the Red River A, B, and C members (see Figure 2-38). Above the Red River Formation, >1,000 ft of impermeable rocks act as an additional seal between the Red River and Broom Creek, the next proposed storage complex, 876 ft of impermeable rocks separate the Broom Creek from the Inyan Kara and an additional 2,545 ft of impermeable rocks separates the Inyan Kara and the lowermost USDW, the Fox Hills Formation (see Figure 2-39). Confining layers above the Inyan Kara include the Skull Creek, Newcastle, Mowry, Greenhorn, and Pierre Formations (Table 2-16).

No known transmissible faults are within these confining systems in the project area. These formations between the Deadwood, Broom Creek, and Inyan Kara and between the Inyan Kara and lowest USDW have demonstrated the ability to prevent the vertical migration of fluids throughout geologic time and are recognized as impermeable flow barriers in the Williston Basin (Downey, 1986; Downey and Dinwiddie, 1988).

Carbonates of the Red River A, B, and C members comprise the first unit with relatively high porosity and permeability above the injection zone and primary sealing formation. The Red River represents the most likely candidate to act as an overlying pressure dissipation zone. The depth to the Red River Formation in the project area is approximately 8,438 ft, and the formation itself is about 450 ft thick. In the unlikely event of out-of-zone migration through the primary and secondary sealing formations, CO₂ would become trapped in the Red River Formation. Monitoring DTS (distributed temperature sensor) data for the Red River Formation using the downhole fiber optic cable in the proposed monitor well provides an additional opportunity for mitigation and remediation (Section 4.0).

Table 2-16. Description of Zones of Confinement above the Immediate Upper Confining Zone (data based on the J-ROC1 well)

Name of Formation	Lithology	Formation Top Depth, ft	Thickness, ft	Depth below Lowest Identified USDW, ft
Pierre	Shale	1,150	1862	0
Greenhorn	Shale	3,012	391	1,862
Mowry	Shale	3,403	56	2,253
Skull Creek	Shale	3,458	235	2,308
Swift	Shale	3,864	473	2,714
Rierdon	Shale	4,337	147	3,187
Piper (Kline member)	Limestone	4,484	110	3,334
Piper (Picard)	Shale	4,594	91	3,444
Opeche	Shale/mudstone	4,685	55	3,535
Amsden	Dolostone/anhydrite	4,974	247	3,824
Kibbey Lime	Limestone	5,384	31	4,234
Charles	Limestone/anhydrite	5,526	147	4,376
Bakken	Shale	6,926	10	5,776
Birdbear	Limestone	7,075	74	5,925
Duperow	Limestone/dolostone	7,149	272	5,999

Table 2-18. XRF Data for the Deadwood B Shale from the J-LOC1 Well

Table 2-19. Mineral Composition of the Deadwood B Shale, derived from XRD analysis of JLOC-1 core samples Deadwood B Shale (10, 144 ft)

Figure 2-42. Change in fluid pH in the Deadwood B shale underlying confining layer. The red line shows the pH calculated at the center of Cell C1 at 0.5 meters below the Deadwood B top. The green line shows Cell C5 at 4.5 meters below the Deadwood B top.

Figure 43. CO₂ concentration (molality) in the Deadwood B shale underlying confining layer for Cells C1–C19.

Figure 2-44. Dissolution and precipitation of minerals in the Deadwood B underlying confining layer. Dashed lines show results for Cell C1 at 0 to 1 meter below the Deadwood B top. Solid lines show results for Cell C2 at 1 to 2 meters below the Deadwood B.

Figure 2-45. Change in percent porosity in the Deadwood B underlying confining layer. The red line shows porosity change for Cell C1 at 0 to 1 meter below the Deadwood B top. The yellow line shows Cell C2 at 1 to 2 meters below the Deadwood B top. The green line shows Cell C3 at 2 to 3 meters below the Deadwood B top. Long-term change in porosity is minimal and stabilized. Cells C4–C19 showed similar results, with net porosity change being less than 0.3%.

Souris River	Dolostone/limestone	7,421	175	6,271
Dawson Bay	Dolostone	7,596	729	6,446
Gunton	Dolostone/limestone	8,325	39	7,175
Stoughton	Shale/limestone	8,364	91	7,214
Lower Red River	Limestone	8,645	488	7,495
Roughlock	Shale/limestone	9,133	25	7,983

2.4.3 Lower Confining Zones

The lower confining zone of the storage complex is the Deadwood B member shale. The Deadwood B member shale consists predominantly of shale with a consistent and correlative package of higher GR, moderate resistivity, higher neutron, moderate density, and high compressional sonic across the project area. The shale within the Deadwood B member is 9,791 ft below the surface and 34 ft thick at the Tundra SGS site (Figures 2-40 and 2-41, Table 2-10).

At 144 ft below the top of the Deadwood C-sand is an 80-ft-thick shaly layer of the Deadwood B member. Data acquired from the core plug samples taken from the Deadwood B member show porosity values ranging from 1.55% to 2.63% and permeability values from 0.0083 to 0.0177 mD (Table 2-17).

2.4.3.1 Mineralogy

Thin-section analysis and well logs show that the Deadwood B interval comprises carbonates and shale facies. The carbonates are composed mainly of calcite minerals and fossils and then by feldspar and quartz. The Deadwood B shows a tight formation characteristic where the permeability ranges from 0.0094 and 3.18 mD and porosity ranges from 1% to 8%.

XRD was performed, and the results confirm the observations made during core analyses and thin-section description.

XRF data show the Deadwood B shale mainly comprises CaO (35%), SiO₂ (30%), and Al₂O₃ (4%) (Table 2-18).

2.4.3.2 Geochemical Interaction

The Deadwood C-sand's underlying confining layer, the Deadwood B, was investigated using PHREEQC geochemical software. A vertically oriented 1D simulation was created using a stack of five cells, each cell 1 meter in thickness. The formation was exposed to CO₂ at the top boundary of the simulation and allowed to enter the system by advection and dispersion processes. The results were calculated at the center of each cell below the confining layer–CO₂ exposure boundary. The mineralogical composition of the Deadwood B was honored (Table 2-19). Formation brine composition was assumed the same as the known composition from the Deadwood sand injection zone above (previously shown in Table 2-14). The injection stream composition was as described by Minnkota (Table 2-15). The Deadwood B Formation temperature and pressure were adjusted from the Deadwood sand reservoir temperature and pressure conditions, 188°F and 4,357 psi, respectively. Two different pressure levels, 4,357 and 4,652 psi, were applied to the CO₂-saturated brine at the base of the Deadwood sand. These values represent the initial and potential pore pressure levels. The higher-pressure results are shown here to represent a potentially more rapid pace of geochemical change. These simulations were run for 45 years to represent 20 years of injection plus 25 years postinjection.

The results showed geochemical processes at work. Figures 2-42, 2-43, 2-44, and 2-45 show findings from the high-pressure, more extreme exposure case. Figure 2-42 shows change in fluid pH over 45 years of simulation time as CO₂ enters the system. Initial change in pH in all the cells from 6 to 5.8 is related to initial equilibration of the model. For the cell at the CO₂ interface, C1, the pH declines from its initial level of 6.0 to 5.3 after 4 years of injection and slowly declines further to 4.4 after the 25-year postinjection period. Similar, but progressively slower, pH change occurs for each cell that is more distant from the CO₂ interface. The pH for Cells 10–19 did not decline over the 45 years of simulation time. Figure 2-43 shows that CO₂ does not penetrate more than 9 meters (represented by Cell C9) within the 45 years simulated.

Figure 2-44 shows the changes in mineral dissolution and precipitation in grams per cubic meter. For Cell C1, K-feldspar is the primary dissolution mineral, with minor chlorite. Illite and quartz precipitation largely replace that dissolution. The reaction rate in the C1 cell dramatically slows after approximately 9 years, and cell geochemistry

				<p>stabilizes. As Cell C1 stabilizes, dissolution and precipitation begin in Cell C2, with minor amounts of chlorite dissolving and modest precipitation of dolomite.</p> <p>Change in porosity (% units) of the Deadwood B underlying confining layer is displayed in Figure 2-45. The overall net porosity changes from dissolution and precipitation are minimal, less than a 0.2% change during the life of the simulation. Cell C1 shows an initial porosity increase of 0.1%, but this change is temporary, and the cell returns to its near-initial porosity value of 2.0%. Cells C2 and C3 undergo similar changes but with progressively longer time delay. At the end of the simulation, no significant net porosity changes were observed for these cells. These results suggest that the Deadwood B will not undergo significant geochemical change in the presence of CO₂ injection.</p>	
NDAC 43-05-01-05 §1b(2) ¶	<p>NDAC 43-05-01-05 §1b(2)</p> <p>(2) A geologic and hydrogeologic evaluation of the facility area, including an evaluation of all existing information on all geologic strata overlying the storage reservoir, including the immediate caprock containment characteristics and all subsurface zones to be used for monitoring. The evaluation must include any available geophysical data and assessments of any regional tectonic activity, local seismicity and regional or local fault zones, and a comprehensive description of local and regional structural or stratigraphic features. The evaluation must describe the storage reservoir's mechanisms of geologic confinement, including rock properties, regional pressure gradients, structural features, and adsorption characteristics with regard to the ability of that confinement to prevent migration of</p>	<p>d. A description of the storage reservoir's mechanisms of geologic confinement characteristics with regard to preventing migration of carbon dioxide beyond the proposed storage reservoir, including:</p> <ul style="list-style-type: none"> Rock properties Regional pressure gradients Adsorption processes 	<p>2.3.3 Mechanism of Geologic Confinement</p> <p>For Tundra SGS, the initial mechanism for geologic confinement of CO₂ injected into the Deadwood Formation will be the cap rock (Icebox interval), which will contain the initially buoyant CO₂ under the effects of relative permeability and capillary pressure. Lateral movement of the injected CO₂ will be restricted by residual gas trapping (relative permeability) and solubility trapping (dissolution of the CO₂ into the native formation brine), confining the CO₂ within the proposed storage reservoir, as identified in Figure 2-3. After the injected CO₂ becomes dissolved in the formation brine, the brine density will increase. This higher-density brine will ultimately sink in the storage formation (convective mixing). Over a much longer period (>100 years), mineralization of the injected CO₂ will ensure long-term, permanent geologic confinement. Injected CO₂ is not expected to adsorb to any of the mineral constituents of the target formation; therefore, this process is not considered to be a viable trapping mechanism in this project. Adsorption of CO₂ is a trapping mechanism notable in the storage of CO₂ in deep unminable coal seams.</p>	<p>Figure 2-20. Laboratory-derived mineralogic characteristics of the Black Island and Deadwood Formations.</p> <p>Figure 2-21a. XRF data from the Black Island Formation from J-LOC1.</p> <p>Figure 2-21b. XRF data from the Upper Deadwood Formation, including the C, D, and E members from J-LOC1.</p>	

		carbon dioxide beyond the proposed storage reservoir. The evaluation must also identify any productive existing or potential mineral zones occurring within the facility area and any underground sources of drinking water in the facility area and within one mile [1.61 kilometers] of its outside boundary. The evaluation must include exhibits and plan view maps showing the following:			
NDAC 43-05-01-05 §1b(2)(g)	<p>NDAC 43-05-01-05 §1b(2)(g)</p> <p>(g) Identification of all structural spill points or stratigraphic discontinuities controlling the isolation of stored carbon dioxide and associated fluids within the storage reservoir;</p>	<p>e. Identification of all characteristics controlling the isolation of stored carbon dioxide and associated fluids within the storage reservoir, including:</p> <ul style="list-style-type: none"> Structural spill points Stratigraphic discontinuities 	<p>2.3.3 Mechanism of Geologic Confinement</p> <p>For Tundra SGS, the initial mechanism for geologic confinement of CO₂ injected into the Deadwood Formation will be the cap rock (Icebox interval), which will contain the initially buoyant CO₂ under the effects of relative permeability and capillary pressure. Lateral movement of the injected CO₂ will be restricted by residual gas trapping (relative permeability) and solubility trapping (dissolution of the CO₂ into the native formation brine), confining the CO₂ within the proposed storage reservoir, as identified in Figure 2-3. After the injected CO₂ becomes dissolved in the formation brine, the brine density will increase. This higher-density brine will ultimately sink in the storage formation (convective mixing). Over a much longer period (>100 years), mineralization of the injected CO₂ will ensure long-term, permanent geologic confinement. Injected CO₂ is not expected to adsorb to any of the mineral constituents of the target formation; therefore, this process is not considered to be a viable trapping mechanism in this project. Adsorption of CO₂ is a trapping mechanism notable in the storage of CO₂ in deep unminable coal seams.</p> <p>2.2.2.6 Seismic Survey</p> <p>A 5-mi-long seismic source test and 6.5-mi² 3D seismic survey were acquired in 2019, and a 12-mi² 3D seismic survey and 21 mi of 2D seismic lines were acquired in 2020 (Figure 2-6). The 3D seismic data allowed for visualization of deep geologic formations at lateral spatial intervals as short as tens of feet. The 2D seismic data provided a means to connect the two 3D seismic data sets and ensure consistent interpretation across the entire Tundra SGS area. The seismic data were used for an assessment of the geologic structure, interpretation of interwell heterogeneity, and well placement. Data products generated from the interpretation and inversion of the 3D seismic data were used as inputs into the geologic model. Additionally, the geologic model that was informed by the seismic data was used to simulate migration of the CO₂ plume. These simulated CO₂ plumes were used to inform the testing and monitoring plan (Section 4.0).</p> <p>The 3D seismic data and J-LOC1 and J-ROC1 well logs were used to interpret surfaces for the formations of interest within the survey area. These surfaces were converted to depth using the time-to-depth relationship derived from the J-LOC1 and J-ROC1 sonic logs. The depth-converted surfaces for the storage reservoir and upper and lower confining zones were used as inputs for the geologic model. These surfaces captured detailed information about the structure and varying thickness of the formations between wells. Interpretation of the 3D seismic data suggests there are no major stratigraphic pinch-outs or structural features with associated spill points in the Black Island/Deadwood storage complex in the Tundra SGS area. There were also no structural features, faults, or discontinuities that would cause a concern about seal integrity in the strata above the Black Island Formation observed in the seismic data.</p> <p>In addition, the 3D seismic data were used to gain a better understanding of interwell heterogeneity across the Tundra SGS area for petrophysical property distributions. Acoustic impedance volumes were created using the 3D seismic and petrophysical data from the J-LOC1 and J-ROC1 wells (e.g., dipole sonic and density logs) (Figure 2-7). The acoustic</p>	<p>Figure 2-20. Laboratory-derived mineralogic characteristics of the Black Island and Deadwood Formations.</p> <p>Figure 2-21a. XRF data from the Black Island Formation from J-LOC1.</p> <p>Figure 2-21b. XRF data from the Upper Deadwood Formation, including the C, D, and E members from J-LOC1.</p> <p>Figure 2-6. Map showing the 2D and 3D seismic surveys in the Tundra SGS area.</p> <p>Figure 2-7. Left: cross section of the inverted acoustic impedance volume for the western seismic 3D survey that transects the J-LOC1 well. The acoustic impedance log calculated from the J-LOC1 sonic and density logs is shown on the inset panel. Right: cross section of the inverted acoustic impedance volume for the eastern 3D survey.</p>	

				impedance volumes were used to classify lithofacies of the Deadwood Formation and distribute lithofacies through the geologic model as well as inform petrophysical property distribution in the geologic model.	
NDAC 43-05-01-05 §1b(2)c	NDAC 43-05-01-05 §1b(2)c (c) Any regional or local faulting;	f. Any regional or local faulting;	<p>2.5 Faults, Fractures, and Seismic Activity</p> <p>In the Tundra SGS area, no known or suspected regional faults or fractures with sufficient permeability and vertical extent to allow fluid movement between formations have been identified through site-specific characterization activities, previous studies, or oil and gas exploration activities. Features interpreted from the 3D seismic data, including paleochannels, a flexure, and a suspected fault in the Precambrian basement, are discussed in this section as well as the data that support the low probability that these features will interfere with containment. The following section also discusses the seismic history of North Dakota and the low probability that seismic activity will interfere with containment.</p> <p>2.5.1 Interpreted Features</p> <p>The analysis of 3D seismic data acquired specifically for Tundra SGS in 2019 and 2020 (Figure 2-6) revealed evidence for suspected paleochannels or preferential erosional zones at the top of the Precambrian basement. Maps of the seismic reflection event interpreted to be the Precambrian–Deadwood contact suggest these features are fairly linear in nature (Figure 2-55). In cross-sectional view of the seismic data, these features appear as depressions in the top of the Precambrian and the lower portion of the Deadwood (Figure 2-56 and 2-57). The isopach values depicted in Figure 2-58 suggest erosional relief on the Precambrian surface of nearly 460 ft. The absence of thickness changes in the Winnipeg or other formations overlying the Deadwood associated with these features suggest these features were filled in during the deposition of the Deadwood.</p> <p>In the western 3D seismic survey data, there is no indication that the identified features impact the intervals above the lower Deadwood. Additionally, there is no indication of offset reflections above or below these features in the western 3D seismic survey data that would suggest any deformation or movement associated with these features. There is no evidence to suggest that these interpreted paleochannel features have sufficient permeability or vertical extent to interfere with containment.</p> <p>There is a flexure in the eastern 3D seismic data where the seismic reflections above the interpreted Precambrian–Deadwood boundary through the Red River Formation appear to dip or sag down (Figure 2-59). These depressions are interpreted to be draped over one of the interpreted paleochannels located at the Precambrian–Deadwood boundary (Figure 2-57). A deep structure was interpreted in the Precambrian basement below this paleochannel and flexure. This structure appears to be a low-dipping thrust fault that terminates at the top of the Precambrian basement (Figure 2-60). The location of this Precambrian fault provides evidence that there was likely preferential erosion along the exposed Precambrian fault trace during the deposition of the Deadwood Formation. The dip of the Precambrian fault is low-angle whereas the flexure above the paleochannel feature is near-vertical, supporting the interpretation of the fault terminating at the top of the Precambrian basement. The seismic interpretation indicates that the interpreted fault in the Precambrian basement is dipping at ~25 degrees relative to horizontal being 0 degrees. The flexure observed in the overlying sediments is likely associated with postdepositional differential compaction above the paleochannel or slump due to movement along this low-angle basement fault. There is no evidence to suggest that this flexural feature has sufficient permeability to interfere with containment.</p>	<p>Figure 2-55. Map showing the time structure of the seismic reflection event interpreted to be the Precambrian–Deadwood contact.</p> <p>Figure 2-56. Cross-sectional view of the 3D seismic data through one of the linear trends in the West 3D seismic survey. Identified formations include Roughlock (green), Deadwood (blue), and Precambrian (yellow). The red box indicates the area that corresponds to the linear feature. Figure 2-55 shows the location of this cross section.</p> <p>Figure 2-57. Cross-sectional view of the 3D seismic data through one of the linear trends in the east 3D seismic survey. Identified formations include Roughlock (green), Deadwood (blue), and Precambrian (yellow). Depressions along the top of the Precambrian suggest the presence of paleochannels. Figure 2-55 shows the location of this cross section.</p> <p>Figure 2-58. Map showing the thickness of the interval from the Precambrian erosional surface up through the top of the Deadwood Formation calculated using the seismic data. The linear trends correspond to areas of increased thickness.</p> <p>Figure 2-59. Map showing the time structure of the seismic reflection event interpreted to be the top of the Red River Formation. The line shows the location of the interpreted paleochannel that underlies the flexure.</p> <p>Figure 2-60. Cross-sectional view of the 3D seismic data through one of the linear trends in the east 3D seismic survey. Identified formations include Deadwood (blue) and Precambrian (yellow). The location of the interpreted low-angle thrust fault is shown by the green dashed line. Cross Section C-C' runs parallel to Cross Section B-B' shown in Figure 2-55 and is located 160 ft to the west of Cross Section B-B'.</p>	
NDAC 43-05-01-05 §1b(2)(j)	NDAC 43-05-01-05 §1b(2)(j) (j) The location, orientation, and properties of known or suspected faults and fractures that may transect the confining	g. Properties of known or suspected faults and fractures that may transect the confining zone in the area of review: Location Orientation Determination of the probability that they would interfere with containment	<p>2.5.1 Interpreted Features</p> <p>The analysis of 3D seismic data acquired specifically for Tundra SGS in 2019 and 2020 (Figure 2-6) revealed evidence for suspected paleochannels or preferential erosional zones at the top of the Precambrian basement. Maps of the seismic reflection event interpreted to be the Precambrian–Deadwood contact suggest these features are fairly linear in nature (Figure 2-55). In cross-sectional view of the seismic data, these features appear as depressions in the top of the Precambrian and the lower portion of the Deadwood (Figure 2-56 and 2-57). The isopach values depicted in Figure 2-58 suggest erosional relief on the Precambrian surface of nearly 460 ft. The absence of thickness changes in the Winnipeg or other formations overlying the Deadwood associated with these features suggest these features were filled in during the deposition of the Deadwood.</p>	<p>Figure 2-55. Map showing the time structure of the seismic reflection event interpreted to be the Precambrian–Deadwood contact.</p> <p>Figure 2-56. Cross-sectional view of the 3D seismic data through one of the linear trends in the West 3D seismic survey. Identified formations include Roughlock (green),</p>	

		<p>zone in the area of review, and a determination that they would not interfere with containment;</p>		<p>other formations overlying the Deadwood associated with these features suggest these features were filled in during the deposition of the Deadwood.</p> <p>In the western 3D seismic survey data, there is no indication that the identified features impact the intervals above the lower Deadwood. Additionally, there is no indication of offset reflections above or below these features in the western 3D seismic survey data that would suggest any deformation or movement associated with these features. There is no evidence to suggest that these interpreted paleochannel features have sufficient permeability or vertical extent to interfere with containment.</p> <p>There is a flexure in the eastern 3D seismic data where the seismic reflections above the interpreted Precambrian–Deadwood boundary through the Red River Formation appear to dip or sag down (Figure 2-59). These depressions are interpreted to be draped over one of the interpreted paleochannels located at the Precambrian–Deadwood boundary (Figure 2-57). A deep structure was interpreted in the Precambrian basement below this paleochannel and flexure. This structure appears to be a low-dipping thrust fault that terminates at the top of the Precambrian basement (Figure 2-60). The location of this Precambrian fault provides evidence that there was likely preferential erosion along the exposed Precambrian fault trace during the deposition of the Deadwood Formation. The dip of the Precambrian fault is low-angle whereas the flexure above the paleochannel feature is near-vertical, supporting the interpretation of the fault terminating at the top of the Precambrian basement. The seismic interpretation indicates that the interpreted fault in the Precambrian basement is dipping at ~25 degrees relative to horizontal being 0 degrees. The flexure observed in the overlying sediments is likely associated with postdepositional differential compaction above the paleochannel or slump due to movement along this low-angle basement fault. There is no evidence to suggest that this flexural feature has sufficient permeability to interfere with containment.</p>	<p>Deadwood (blue), and Precambrian (yellow). The red box indicates the area that corresponds to the linear feature. Figure 2-55 shows the location of this cross section.</p> <p>Figure 2-57. Cross-sectional view of the 3D seismic data through one of the linear trends in the east 3D seismic survey. Identified formations include Roughlock (green), Deadwood (blue), and Precambrian (yellow). Depressions along the top of the Precambrian suggest the presence of paleochannels. Figure 2-55 shows the location of this cross section.</p> <p>Figure 2-58. Map showing the thickness of the interval from the Precambrian erosional surface up through the top of the Deadwood Formation calculated using the seismic data. The linear trends correspond to areas of increased thickness.</p> <p>Figure 2-59. Map showing the time structure of the seismic reflection event interpreted to be the top of the Red River Formation. The line shows the location of the interpreted paleochannel that underlies the flexure.</p> <p>Figure 2-60. Cross-sectional view of the 3D seismic data through one of the linear trends in the east 3D seismic survey. Identified formations include Deadwood (blue) and Precambrian (yellow). The location of the interpreted low-angle thrust fault is shown by the green dashed line. Cross Section C-C' runs parallel to Cross Section B-B' shown in Figure 2-55 and is located 160 ft to the west of Cross Section B-B'.</p>
<p>NDAC 43-05-01-05 §1b(2) ¶ & §1b(2)(m)</p>	<p>NDAC 43-05-01-05 §1b(2) (2) A geologic and hydrogeologic evaluation of the facility area, including an evaluation of all existing information on all geologic strata overlying the storage reservoir, including the immediate caprock containment characteristics and all subsurface zones to be used for monitoring. The evaluation must</p>	<p>h. Information on any regional tectonic activity, and the seismic history, including: The presence and depth of seismic sources; Determination of the probability that seismicity would interfere with containment;</p>	<p>2.5 Faults, Fractures, and Seismic Activity In the Tundra SGS area, no known or suspected regional faults or fractures with sufficient permeability and vertical extent to allow fluid movement between formations have been identified through site-specific characterization activities, previous studies, or oil and gas exploration activities. Features interpreted from the 3D seismic data, including paleochannels, a flexure, and a suspected fault in the Precambrian basement, are discussed in this section as well as the data that support the low probability that these features will interfere with containment. The following section also discusses the seismic history of North Dakota and the low probability that seismic activity will interfere with containment.</p> <p>2.5.1 Interpreted Features The analysis of 3D seismic data acquired specifically for Tundra SGS in 2019 and 2020 (Figure 2-6) revealed evidence for suspected paleochannels or preferential erosional zones at the top of the Precambrian basement. Maps of the seismic reflection event interpreted to be the Precambrian–Deadwood contact suggest these features are fairly linear in nature (Figure 2-55). In cross-sectional view of the seismic data, these features appear as depressions in the top of the Precambrian and the lower portion of the Deadwood (Figure 2-56 and 2-57). The isopach values depicted in Figure 2-58 suggest erosional relief on the Precambrian surface of nearly 460 ft. The absence of thickness changes in the Winnipeg or other formations overlying the Deadwood associated with these features suggest these features were filled in during the deposition of the Deadwood.</p>	<p>Figure 2-55. Map showing the time structure of the seismic reflection event interpreted to be the Precambrian–Deadwood contact.</p> <p>Figure 2-56. Cross-sectional view of the 3D seismic data through one of the linear trends in the West 3D seismic survey. Identified formations include Roughlock (green), Deadwood (blue), and Precambrian (yellow). The red box indicates the area that corresponds to the linear feature. Figure 2-55 shows the location of this cross section.</p> <p>Figure 2-57. Cross-sectional view of the 3D seismic data through one of the linear trends in the east 3D seismic survey. Identified formations include Roughlock (green), Deadwood (blue), and Precambrian (yellow).</p>	

		<p>include any available geophysical data and assessments of any regional tectonic activity, local seismicity and regional or local fault zones, and a comprehensive description of local and regional structural or stratigraphic features. The evaluation must describe the storage reservoir's mechanisms of geologic confinement, including rock properties, regional pressure gradients, structural features, and adsorption characteristics with regard to the ability of that confinement to prevent migration of carbon dioxide beyond the proposed storage reservoir. The evaluation must also identify any productive existing or potential mineral zones occurring within the facility area and any underground sources of drinking water in the facility area and within one mile [1.61 kilometers] of its outside boundary. The evaluation must include exhibits and plan view maps showing the following:</p> <p>NDAC 43-05-01-05 §1b(2)(m) (m) Information on the seismic history, including the presence and depth of seismic sources and a</p>		<p>In the western 3D seismic survey data, there is no indication that the identified features impact the intervals above the lower Deadwood. Additionally, there is no indication of offset reflections above or below these features in the western 3D seismic survey data that would suggest any deformation or movement associated with these features. There is no evidence to suggest that these interpreted paleochannel features have sufficient permeability or vertical extent to interfere with containment.</p> <p>There is a flexure in the eastern 3D seismic data where the seismic reflections above the interpreted Precambrian–Deadwood boundary through the Red River Formation appear to dip or sag down (Figure 2-59). These depressions are interpreted to be draped over one of the interpreted paleochannels located at the Precambrian–Deadwood boundary (Figure 2-57). A deep structure was interpreted in the Precambrian basement below this paleochannel and flexure. This structure appears to be a low-dipping thrust fault that terminates at the top of the Precambrian basement (Figure 2-60). The location of this Precambrian fault provides evidence that there was likely preferential erosion along the exposed Precambrian fault trace during the deposition of the Deadwood Formation. The dip of the Precambrian fault is low-angle whereas the flexure above the paleochannel feature is near-vertical, supporting the interpretation of the fault terminating at the top of the Precambrian basement. The seismic interpretation indicates that the interpreted fault in the Precambrian basement is dipping at ~25 degrees relative to horizontal being 0 degrees. The flexure observed in the overlying sediments is likely associated with postdepositional differential compaction above the paleochannel or slump due to movement along this low-angle basement fault. There is no evidence to suggest that this flexural feature has sufficient permeability to interfere with containment.</p> <p><i>2.5.5.1 Precambrian Fault Geomechanics Study</i> Geomechanical modeling was done to determine the potential risk of induced seismicity associated with the interpreted Precambrian fault and planned injection activities. The 3D seismic data were used to estimate the dip and strike of the interpreted fault, including uncertainty ranges on both for input into this modeling. A 1D stress model was built from the J-LOC1 well data using the density, compressional sonic, and shear sonic well logs. The pore pressure is assumed equivalent to hydrostatic pressure, with a slight overpressure in the Broom Creek Formation. Overburden stress was estimated by integrating the density data and projecting the density trend to surface. The principal horizontal stresses SHmin and SHmax were estimated using the modified Eaton poroelastic model from Theircelin and Plumb (1994) and calibrated to closure pressure measurements in the Deadwood, Broom Creek, and Inyan Kara Formations. Static elastic rock property inputs were calibrated to core measurements. The most conservative approach was taken by choosing the largest differential stress model to conduct the analysis, as it represented the highest risk scenario. A stress trend was developed to represent a consistent stress trend through the Deadwood Formation that was an equivalent trend through the highest-magnitude stresses. For the purposes of failure analysis on the existing feature in the seismic interpretation, that stress trend was projected down into the Precambrian basement.</p> <p>To understand the highest possible risk scenario, the scenario where the interpreted Precambrian fault extends into the Deadwood Formation was considered even though the seismic data do not suggest that it does. Conservative estimates for friction coefficient (30) and cohesion (0) were used in this analysis. Given those conditions and the state of stress modeled in the Deadwood, the failure analysis indicated that a pressure increase of 3,600–4,800 psi would be required to induce shear failure on that feature (Figure 2-61).</p> <p>The maximum expected pressure change in the Deadwood due to planned injection activities does not exceed 1,800 psi, which is well below the 3,600–4,800-psi pressure threshold for failure (Figure 2-62). Additionally, the injection interval is approximately 120 ft above the Precambrian–Deadwood boundary and the expected pressure change due to planned injection activities at the Precambrian–Deadwood boundary does not exceed 60 psi. Analysis of the geomechanics study results as applied to the characteristics of the interpreted Precambrian fault and site-specific geomechanical data suggests planned injection activities will not cause induced seismicity.</p> <p>Additionally, sensitivity analysis was run using the publicly available Fault Slip Potential tool using the inputs of friction coefficient, SHmax azimuth, fault dip, fault strike, pore pressure, SHmax magnitude, SHmin magnitude, and overburden magnitude. The results proved insensitive to all inputs except the dip of the fault. At the low-angle dip of the fault, there is very low risk of failure given the interpretation of the state of stress.</p> <p><i>2.5.2 Seismic Activity</i> The Williston Basin is a tectonically stable region of the North American Craton. Zhou and others (2008) summarize that “the Williston Basin as a whole is in an overburden compressive stress regime,” which could be attributed to the general</p>	<p>Depressions along the top of the Precambrian suggest the presence of paleochannels. Figure 2-55 shows the location of this cross section.</p> <p>Figure 2-58. Map showing the thickness of the interval from the Precambrian erosional surface up through the top of the Deadwood Formation calculated using the seismic data. The linear trends correspond to areas of increased thickness.</p> <p>Figure 2-59. Map showing the time structure of the seismic reflection event interpreted to be the top of the Red River Formation. The line shows the location of the interpreted paleochannel that underlies the flexure.</p> <p>Figure 2-60. Cross-sectional view of the 3D seismic data through one of the linear trends in the east 3D seismic survey. Identified formations include Deadwood (blue) and Precambrian (yellow). The location of the interpreted low-angle thrust fault is shown by the green dashed line. Cross Section C-C' runs parallel to Cross Section B-B' shown in Figure 2-55 and is located 160 ft to the west of Cross Section B-B'.</p> <p>Figure 2-61. Mohr circle depiction of the stress state at the depth of the Deadwood Formation indicates a pressure window of 3,600 to 4,800 psi to create failure on the fault represented by the pink dots. Pink dots represent the strike and dip values for the fault interpreted from the seismic data relative to in situ stress orientations.</p> <p>Figure 2-62. Map showing the maximum pressure change expected within the injection zone from the proposed injection activities. The location of the interpreted paleochannel and flexure is indicated by the red line.</p> <p>Table 2-25. Summary of Seismic Events Reported to Have Occurred in North Dakota (from Anderson, 2016)</p> <p>Figure 2-63. Location of major faults, tectonic boundaries, and seismic events in North Dakota (modified from Anderson, 2016). The black dots indicate seismic event locations listed in Table 2-24.</p> <p>Figure 2-64. Probabilistic map showing how often scientists expect damaging seismic event shaking around the United States (U.S.</p>
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		determination that the seismicity would not interfere with containment;		<p>stability of the North American Craton. Interpreted structural features associated with tectonic activity in the Williston Basin in North Dakota include anticlinal and synclinal structures in the western half of the state, lineaments associated with Precambrian basement block boundaries, and faults (North Dakota Industrial Commission, 2019).</p> <p>Between 1870 and 2015, 13 seismic events were detected within the North Dakota portion of the Williston Basin (Table 2-25) (Anderson, 2016). Of these 13 seismic events, only three occurred along one of the eight interpreted Precambrian basement faults in the North Dakota portion of the Williston Basin (Figure 2-63). The seismic event recorded closest to the Tundra SGS storage facility area occurred 39.6 mi from the J-ROC1 well near Huff, North Dakota (Table 2-25). The magnitude of this seismic event is estimated to have been 4.4.</p> <p>Studies completed by the U.S. Geological Survey (USGS) indicate there is a low probability of damaging seismic events occurring in North Dakota, with less than two damaging seismic events predicted to occur over a 10,000-year time period (Figure 2-64) (U.S. Geological Survey, 2019). A 1-year seismic forecast (including both induced and natural seismic events) released by USGS in 2016 determined North Dakota has very low risk (less than 1% chance) of experiencing any seismic events resulting in damage (U.S. Geological Survey, 2016). Frohlich and others (2015) state there is very little seismic activity near the injection wells in the Williston Basin. They noted only two historic seismic events in North Dakota that could be associated with nearby oil and gas activities. These results indicate relatively stable geologic conditions in the region surrounding the potential injection site. Based on the review and assessment of 1) the USGS studies, 2) the characteristics of the Black Island and Deadwood injection zone and upper and lower confining zones, 3) the low risk of induced seismicity due to the basin stress regime, and 4) the history of recorded seismic events, seismic activity is not expected to interfere with containment of the maximum volume of CO₂ proposed to be injected annually over the life of this project.</p>	Geological Survey, 2019).The map shows there is a low probability of damaging seismic events occurring in North Dakota.
NDAC 43-05-01-05 §1b(2) ¶ NDAC 43-05-01-05 §1b(2)(n)	<p>NDAC 43-05-01-05 §1b(2) (2) A geologic and hydrogeologic evaluation of the facility area, including an evaluation of all existing information on all geologic strata overlying the storage reservoir, including the immediate caprock containment characteristics and all subsurface zones to be used for monitoring. The evaluation must include any available geophysical data and assessments of any regional tectonic activity, local seismicity and regional or local fault zones, and a comprehensive description of local and regional structural or stratigraphic features. The evaluation must describe the storage reservoir's mechanisms of geologic confinement,</p>	<p>i. Illustration of the regional geology, hydrogeology, and the geologic structure of the storage reservoir area: Geologic maps Topographic maps Cross sections</p>	<p>2.3 Storage Reservoir (Injection Zone) Regionally, the Black Island and Deadwood Formations are laterally extensive (Figure 2-8). The Black Island comprises high-energy shallow marine sandstone (permeable storage intervals) and shale (impermeable layers). The sandy members (C-sand and E member) of the Deadwood Formation comprise reworked quartz arenites of marginal marine environment (Figure 2-9). The Deadwood Formation unconformably overlies the Precambrian basement and is unconformably overlain by the sands of the Black Island Formation followed by the conformable Icebox Formation (Figure 2-3).</p> <p>At J-ROC1, the Deadwood C-sand member is made up of 50 ft of sandstone and is located at a depth of 9,548 ft. Across the model area, the Deadwood C-sand member varies in thickness from 40 to 88 ft, with an average thickness of 64 ft. Based on offset well data and geologic model characteristics, the Deadwood C-sand member is 100% sandstone. The Deadwood E member and Black Island Formations are made up of 69 ft of sandstone and 19 ft of dolostone and limestone at J-ROC1 and are located at a depth of 9,283 ft. Across the project area, the Deadwood E member varies in thickness from 0 to 139 ft, with an average thickness of 81 ft. The Black Island Formation varies in thickness from 14 to 77 ft, with an average of 36 ft. Based on offset well data and geologic model characteristics, the net reservoir thickness within the project area ranges from 63 to 287 ft, with an average of 165 ft (Figure 2-10).</p> <p>The well log signatures for the Black Island and Deadwood storage complex are consistent and predictable across the project area. The following are the correlation definitions used to indicate the reservoir and confining zones (Figure 2-11):</p> <ul style="list-style-type: none"> • The Icebox Formation is indicated at the transitions between a moderate GR, higher resistivity, low neutron, high density, and moderate compressional sonic for the base of the Roughlock Formation to the high GR, low resistivity, high neutron, high density, and high compressional sonic. The Icebox Formation is correlative across the project area. • The Black Island Formation is indicated by the transition from the Icebox Formation to a relatively low GR, low neutron, high density, and low compressional sonic. The Black Island has interbedded high-GR and moderate-resistivity sections. • The Deadwood Formation (Deadwood E member) is indicated by a transition from the base high GR signature of the Black Island Formation to a low GR signature, lower neutron, higher density, and lower compressional sonic. The Deadwood E thins from west to east across the project area. • The Deadwood D member (base of Deadwood E member) is indicated by a transition to moderate to higher GR from top to base, higher resistivity, low neutron, high density, and low to higher compressional sonic from top to base. 	<p>2.3 Storage Reservoir (Injection Zone) Regionally, the Black Island and Deadwood Formations are laterally extensive (Figure 2-8). The Black Island comprises high-energy shallow marine sandstone (permeable storage intervals) and shale (impermeable layers). The sandy members (C-sand and E member) of the Deadwood Formation comprise reworked quartz arenites of marginal marine environment (Figure 2-9). The Deadwood Formation unconformably overlies the Precambrian basement and is unconformably overlain by the sands of the Black Island Formation followed by the conformable Icebox Formation (Figure 2-3).</p> <p>At J-ROC1, the Deadwood C-sand member is made up of 50 ft of sandstone and is located at a depth of 9,548 ft. Across the model area, the Deadwood C-sand member varies in thickness from 40 to 88 ft, with an average thickness of 64 ft. Based on offset well data and geologic model characteristics, the Deadwood C-sand member is 100% sandstone. The Deadwood E member and Black Island Formations are made up of 69 ft of sandstone and 19 ft of dolostone and limestone at J-ROC1 and are located at a depth of 9,283 ft. Across the project area, the Deadwood E member varies in thickness from 0 to 139 ft, with an average thickness of 81 ft. The Black Island Formation varies in thickness from 14 to 77 ft, with an average of 36 ft. Based on offset well data and geologic model characteristics, the net reservoir thickness within the project area ranges from 63 to 287 ft, with an average of 165 ft (Figure 2-10).</p> <p>The well log signatures for the Black Island and Deadwood storage complex are consistent and predictable across the project area. The following are the correlation definitions used to indicate the reservoir and confining zones (Figure 2-11):</p> <ul style="list-style-type: none"> • The Icebox Formation is indicated at the transitions between a moderate GR, higher resistivity, low neutron, high density, and moderate compressional sonic for the base of the Roughlock Formation to the high GR, low resistivity, high neutron, high density, and high compressional sonic. The Icebox Formation is correlative across the project area. • The Black Island Formation is indicated by the transition from the Icebox Formation to a relatively low GR, low neutron, high density, and low compressional sonic. The Black Island has interbedded high-GR and moderate-resistivity sections. • The Deadwood Formation (Deadwood E member) is indicated by a transition from the base high GR signature of the Black Island Formation to a low GR signature, lower neutron, higher density, and lower compressional sonic. The Deadwood E thins from west to east across the project area. • The Deadwood D member (base of Deadwood E member) is indicated by a transition to moderate to higher GR from top to base, higher resistivity, low neutron, high density, and low to higher compressional sonic from top to base. 	<p>Figure 2-8. Areal extent of the Deadwood Formation in North Dakota (modified from Nesheim, 2012b).</p> <p>Figure 2-9. Type log showing the interpreted Deadwood members within the Williston Basin (Lefever and others, 1987).</p> <p>Figure 2-10. Isopach map of the Black Island and Deadwood Formations in the simulation model extent.</p> <p>Figure 2-11. Well log display of the interpreted lithologies of the Roughlock, Icebox, Black Island, Deadwood, and Precambrian in J-ROC1.</p> <p>Figure 2-12a. Regional well log stratigraphic cross sections of the Roughlock, Icebox, Black Island, and Deadwood Formations and the Precambrian basement flattened on the top of the Precambrian basement. Logs displayed in tracks from left to right are 1) GR (green) and caliper (red), 2) delta time (blue), and 3) interpreted lithology log.</p> <p>Figure 2-12b. Regional well log cross sections showing the structure of the Roughlock, Icebox, Black Island, and Deadwood Formations and the Precambrian basement. Logs displayed in tracks from left to right are 1) GR (green) and caliper (red) and 2) delta time (blue).</p>

including rock properties, regional pressure gradients, structural features, and adsorption characteristics with regard to the ability of that confinement to prevent migration of carbon dioxide beyond the proposed storage reservoir. The evaluation must also identify any productive existing or potential mineral zones occurring within the facility area and any underground sources of drinking water in the facility area and within one mile [1.61 kilometers] of its outside boundary. The evaluation must include exhibits and plan view maps showing the following:

NDAC 43-05-01-05 §1b(2)(n)
(n) Geologic and topographic maps and cross sections illustrating regional geology, hydrogeology, and the geologic structure of the facility area; and

- The Deadwood C member is the transition between the high GR of the Deadwood D member and moderate GR, higher resistivity, low neutron, high density, and low compressional sonic. The Deadwood C-sand member at the base of the Deadwood C member is indicated by a section of low GR (10 API), low resistivity, moderate neutron, moderate density, and moderate compressional sonic.
- The Deadwood B member (base of Deadwood C-sand member) is indicated by the transition from a low GR signature of the Deadwood C-sand member to a high GR, higher resistivity, low neutron, high density, and higher compressional sonic.
- The Deadwood B member shale unit is indicated by a higher GR, moderate resistivity, higher neutron, moderate density, and high compressional sonic. This unit is contained within the Deadwood B member and can be correlated across the project area.
- The Precambrian basement is indicated by a change from low to relatively high GR, low-to-moderate resistivity, and a lower compressional sonic character that can be correlated across the project area.

Seismic data collected as part of site characterization efforts (Figure 2-6) were used to reinforce structural correlation and thickness estimations of the storage reservoir. The combined structural correlation and analyses indicate that there should be few-to-no major reservoir stratigraphic discontinuities near J-LOC1 and J-ROC1 (Figures 2-12a and 2-12b). The Deadwood E member pinches out 12.5 mi to the east of the J-ROC1 site. A structure map of the Deadwood and Black Island Formations shows no detectable features (e.g., folds, domes, or fault traps) with associated spill points in the project area (Figure 2-13).

For additional information, go to Section 2.3 of the Tundra SGS SFP.

Table 2-1. Formations Comprising the Tundra SGS CO₂ Storage Complex

	Formation	Purpose	Average Depth		Lithology
			Average Thickness at Tundra SGS Site, ft	Tundra SGS Site, ft TVD	
Storage Complex	Icebox	Upper confining zone	118 (58 to 176)	9,308	Shale
	Black Island and Deadwood E member	Storage reservoir (i.e., injection zone)	118 (35 to 202)	9,427	Sandstone, shale, dolostone, limestone
	Deadwood C member sand	Storage reservoir (i.e., injection zone)	64 (40 to 88)	9,773	Sandstone
	Deadwood B member shale	Lower confining zone	34 (20 to 49)	9,791	Shale

Table 2-5. Description of CO₂ Storage Reservoir (injection zone) at the J-LOC1 Well

Injection Zone Properties	
Property	Description
Formation Name	Black Island, Deadwood E member, and Deadwood C-sand member
Lithology	Sandstone, dolostone, limestone
Formation Top Depth, ft	9782.2, 9820.9, and 10,077.4
Thickness, ft	38.9, 92.3, and 60.9
Capillary Entry Pressure (CO ₂ /Brine), psi	0.16

Geologic Properties

Formation	Property	Laboratory Analysis	Model Property Distribution
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Figure 2-13. Structure map of the Black Island and Deadwood Formations across the simulation model extent.

Table 2-5. Description of CO₂ Storage Reservoir (injection zone) at the J-LOC1 Well

Figure 2-14. Cross section of the Tundra SGS CO₂ storage complex from the geologic model showing lithofacies distribution in the Deadwood Formation. Depths are referenced to mean sea level.

Figure 2-15. Vertical distribution of core-derived porosity and permeability values in the Tundra SGS CO₂ storage complex.

Table 2-6. Deadwood Microfracture Results from J-LOC1

Table 2-10. Properties of Upper and Lower Confining Zones at the J-LOC1 Well

Figure 2-29. Areal extent of the Icebox Formation in western North Dakota (modified from Nesheim, 2012a).

Figure 2-30. Structure map of the upper confining zone across the simulation model extent.

Figure 2-31. Isopach map of the upper confining zone across the simulation model extent.

Figure 2-32. Well log display of the upper confining zone at the J-ROC1 well.

Figure 2-33. J-LOC1 Icebox Formation MDT microfracture in situ stress test pump cycle graph at 9,749.5 ft.

Figure 2-34. J-LOC1 Icebox Formation MDT microfracture in situ stress test pump cycle graph at 9,751.2 ft.

Table 2-11. Icebox Core Sample Porosity and Permeability from J-LOC1

Table 2-16. Description of Zones of Confinement above the Immediate Upper Confining Zone (data based on the J-ROC1 well)

Figure 2-38. Isopach map of the interval between the top of the Black Island Formation

Black Island (sandstone)	Porosity, %*	8.0 (3.4–10.3)	5.6 (1.1–14.8)
	Permeability, mD**	3.7 (0.0019–157)	0.805 (<0.0001–96.0)
Deadwood E Member (sandstone)	Porosity, %	10 (6.85–14.43)	7.0 (0–17.7)
	Permeability, mD	5.63 (0.0325–2,060)	3.88 (<0.0001–4549.2)
Deadwood C-Sand Member	Porosity, %	7.6 (1.01–14.69)	7.6 (0.3–17.2)
	Permeability, mD	11 (0.0018–1140)	7.03 (<0.0001–830.3)

2.4 Confining Zones

The confining zones for the Deadwood and Black Island Formations are the overlying Icebox Formation and underlying Deadwood B member shale (Figure 2-3, Table 2-10). All three units, the Icebox Formation, Deadwood B member shale, and Precambrian basement, consist of impermeable rock layers.

Table 2-10. Properties of Upper and Lower Confining Zones at the J-LOC1 Well

Confining Zone Properties	Upper Confining Zone	Lower Confining Zone
Formation Name	Icebox	Deadwood B member shale
Lithology	Shale	Shale
Formation Top Depth, ft	9,308	9,791
Thickness, ft	118	34
Porosity, % (core data)*	3.6***	2.0
Permeability, mD (core data)**	0.00002***	0.0103
Capillary Entry Pressure (CO ₂ /brine), psi	845	176****
Depth below Lowest Identified USDW, ft	8,097	8,580

2.4.1 Upper Confining Zone

In the Tundra SGS area, the Icebox consists of shale. This upper confining zone is laterally extensive across the project area (Figures 2-29 and 2-30) 9,308 ft below the land surface and 118 ft thick at the Tundra SGS site (Table 2-10 and Figure 2-31). The upper confining zone has sufficient areal extent and integrity to contain the injected CO₂. The upper confining zone is free of transmissive faults and fractures (Section 2.5). The contact between the underlying sandstone of the Black Island Formation is conformable and can be correlated across the project area. The transition from the Icebox to the Black Island is indicated by a relatively low GR, low neutron, high density, and low compressional sonic across the contact (Figure 2-32).

and the top of the Swift Formation. This interval represents the primary and secondary confinement zones.

Figure 2-39. Isopach map of the interval between the top of the Inyan Kara Formation and the top of the Pierre Formation. This interval represents the tertiary confinement zone.

Figure 2-40. Structure map of the Deadwood B member shale across the greater Tundra SGS area.

Figure 2-41. Isopach map of the Deadwood B member shale across the Tundra SGS area.

Table 2-17. Deadwood B Member Shale Core Sample Porosity and Permeability from J-LOC1

Table 3-6. Description of Zones of Confinement above the Immediate Upper Confining Zone (data based on the J-ROC1 well)

Figure 3-9. Major aquifer systems of the Williston Basin.

Figure 3-10. Upper stratigraphy of Oliver County showing the stratigraphic relationship of Cretaceous and Tertiary groundwater-bearing formations (modified from Croft, 1973).

Figure 3-11. Depth to surface of the Fox Hills Formation in western North Dakota (Fischer, 2013).

Figure 3-12. Potentiometric surface of the Fox Hills–Hell Creek aquifer system shown in feet of hydraulic head above sea level. Flow is to the northeast through the area of investigation in central Oliver County (modified from Fischer, 2013).

Figure 3-13. Map of water wells in the AOR in relation to the McCall-1 planned injection well, the NRDT-1 proposed monitoring well, storage facility area, AOR, and legacy oil and gas wells.

Figure 3-14. West–east cross section of the major regional aquifer layers in Mercer and Oliver Counties and their associated geologic relationships (modified from Croft, 1973). The

Microfracture in situ stress tests were performed using the MDT tool in the J-LOC1 wellbore. Microfracture stress tests were attempted in the J-ROC1 well; however, because of extremely unstable wellbore conditions, the MDT stress tool run was not performed after a near loss of the tool in the wellbore.

For the J-LOC1 well, in the Icebox Formation at 9,749.5 and 9,751.2 ft, the MDT tool was unable to cause a breakdown in the formation with an applied maximum injection pressure of 10,984.9 and 10,867.24 psi, respectively (Figures 2-33 and 2-34). The maximum injection pressure was limited by the dual-packer mechanical specifications having a set maximum differential pressure rating between the upper packer and hydrostatic pressure of 5,500 psi; see Appendix D, “Schlumberger Dual-Packer Module.” The inability to break down the Icebox Formation at the two depths indicated that the formation is very tight competent and exhibits sufficient geologic integrity to contain the injected CO₂ stream.

The Icebox Formation was not suitable to collect competent core samples from the J-LOC1 well core for the purposes of porosity and permeability laboratory tests; the samples would crush in the equipment. The formation was found to be tight, and porosity and permeability estimates were derived from HPMI testing for one sample (Table 2-11). The lithology of the cored sections of the Icebox Formation is primarily shale, with minor pyrite.

2.4.2 Additional Overlying Confining Zones

Several other formations provide additional confinement above the Icebox. Impermeable rocks above the primary seal include the Roughlock Formation and the Red River D member, which make up the first additional group of confining formations (Table 2-16). Together with the Icebox, these formations are 612 ft thick and will isolate the Deadwood/Black Island Formations fluids from migrating upward into the next permeable interval, the Red River A, B, and C members (see Figure 2-38). Above the Red River Formation, >1,000 ft of impermeable rocks act as an additional seal between the Red River and Broom Creek, the next proposed storage complex, 876 ft of impermeable rocks separate the Broom Creek from the Inyan Kara and an additional 2,545 ft of impermeable rocks separates the Inyan Kara and the lowermost USDW, the Fox Hills Formation (see Figure 2-39). Confining layers above the Inyan Kara include the Skull Creek, Newcastle, Mowry, Greenhorn, and Pierre Formations (Table 2-16).

No known transmissible faults are within these confining systems in the project area. These formations between the Deadwood, Broom Creek, and Inyan Kara and between the Inyan Kara and lowest USDW have demonstrated the ability to prevent the vertical migration of fluids throughout geologic time and are recognized as impermeable flow barriers in the Williston Basin (Downey, 1986; Downey and Dinwiddie, 1988).

Carbonates of the Red River A, B, and C members comprise the first unit with relatively high porosity and permeability above the injection zone and primary sealing formation. The Red River represents the most likely candidate to act as an overlying pressure dissipation zone. The depth to the Red River Formation in the project area is approximately 8,438 ft, and the formation itself is about 450 ft thick. In the unlikely event of out-of-zone migration through the primary and secondary sealing formations, CO₂ would become trapped in the Red River Formation. Monitoring DTS (distributed temperature sensor) data for the Red River Formation using the downhole fiber optic cable in the proposed monitor well provides an additional opportunity for mitigation and remediation (Section 4.0).

Table 2-16. Description of Zones of Confinement above the Immediate Upper Confining Zone (data based on the J-ROC1 well)

Name of Formation	Lithology	Formation Top Depth, ft	Thickness, ft	Depth below Lowest Identified USDW, ft
Pierre	Shale	1,150	1862	0
Greenhorn	Shale	3,012	391	1,862
Mowry	Shale	3,403	56	2,253
Skull Creek	Shale	3,458	235	2,308
Swift	Shale	3,864	473	2,714

black dots on the inset map represent the locations of the water wells illustrated on the cross section.

Rierdon	Shale	4,337	147	3,187
Piper (Kline member)	Limestone	4,484	110	3,334
Piper (Picard)	Shale	4,594	91	3,444
Opeche	Shale/mudstone	4,685	55	3,535
Amsden	Dolostone/anhydrite	4,974	247	3,824
Kibbey Lime	Limestone	5,384	31	4,234
Charles	Limestone/anhydrite	5,526	147	4,376
Bakken	Shale	6,926	10	5,776
Birdbear	Limestone	7,075	74	5,925
Duperow	Limestone/dolostone	7,149	272	5,999
Souris River	Dolostone/limestone	7,421	175	6,271
Dawson Bay	Dolostone	7,596	729	6,446
Gunton	Dolostone/limestone	8,325	39	7,175
Stoughton	Shale/limestone	8,364	91	7,214
Lower Red River	Limestone	8,645	488	7,495
Roughlock	Shale/limestone	9,133	25	7,983

2.4.3 Lower Confining Zones

The lower confining zone of the storage complex is the Deadwood B member shale. The Deadwood B member shale consists predominantly of shale with a consistent and correlative package of higher GR, moderate resistivity, higher neutron, moderate density, and high compressional sonic across the project area. The shale within the Deadwood B member is 9,791 ft below the surface and 34 ft thick at the Tundra SGS site (Figures 2-40 and 2-41, Table 2-10).

At 144 ft below the top of the Deadwood C-sand is an 80-ft-thick shaly layer of the Deadwood B member. Data acquired from the core plug samples taken from the Deadwood B member show porosity values ranging from 1.55% to 2.63% and permeability values from 0.0083 to 0.0177 mD (Table 2-17).

3.4 Protection of USDWs

3.4.1 Introduction of USDW Protection

The primary confining zone and additional overlying confining zones geologically isolate the Fox Hills Formation, the deepest USDW in the AOR. The Icebox Formation is the primary confining zone with additional confining layers above, which geologically isolates all USDWs from the injection zone (Table 3-6).

3.4.2 Geology of USDW Formations

The hydrogeology of western North Dakota comprises several shallow freshwater-bearing formations of the Quaternary, Tertiary, and upper Cretaceous-aged sediments underlain by multiple saline aquifer systems of the Williston Basin (Figure 3-9). These saline and freshwater systems are separated by the Cretaceous Pierre Shale of the Williston Basin, a regionally extensive shale between 1000 and 1500 ft thick (Thamke and others, 2014).

The freshwater aquifers comprise the Cretaceous Fox Hills and Hell Creek Formations; overlying Cannonball, Tongue River, and Sentinel Butte Formations of Tertiary Fort Union Group; and the Tertiary Golden Valley Formation (Figure 3-

			<p>10). Above these are undifferentiated alluvial and glacial drift Quaternary aquifer layers, which are not necessarily present in all parts of the AOR (Croft, 1973).</p> <p>The lowest USDW in the AOR is the Fox Hills Formation, which together with the overlying Hell Creek Formation, is a confined aquifer system. The Hell Creek Formation is a poorly consolidated unit composed of interbedded sandstone, siltstone, and claystones with occasional carbonaceous beds, all fluvial origin. The underlying Fox Hills Formation is interpreted as interbedded nearshore marine deposits of sand, silt, and shale deposited as part of the final Western Interior Seaway retreat (Fischer, 2013). The Fox Hills Formation in the AOR is approximately 700 to 900 ft deep and 200 to 350 ft thick. The structure of the Fox Hills and Hell Creek Formations follows that of the Williston Basin, dipping gently toward the center of the basin to the northwest of the AOR (Figure 3-11).</p> <p>The Pierre Shale is a thick, regionally extensive shale unit, which forms the lower boundary of the Fox Hills–Hell Creek system, also isolating all overlying freshwater aquifers from the deeper saline aquifer systems. The Pierre shale is a dark gray to black marine shale and is typically 1000 ft thick in the AOR (Thamke and others, 2014).</p> <p>3.4.3 Hydrology of USDW Formations</p> <p>The aquifers of the Fox Hills and Hell Creek Formations are hydraulically connected and function as a single confined aquifer system (Fischer, 2013). The Bacon Creek Member of the Hell Creek Formation forms a regional aquitard for the Fox Hills–Hell Creek aquifer system, which isolates it from the overlying aquifer layers. Recharge for the Fox Hills–Hell Creek aquifer system occurs in southwestern North Dakota along the Cedar Creek Anticline and discharges into overlying strata under central and eastern North Dakota (Fischer, 2013). Flow through the AOR is to the east (Figure 3-12). Water sampled from the Fox Hills Formation is a sodium bicarbonate type with a total dissolved solids (TDS) content of approximately 1,500–1,600 ppm. Previous analysis of Fox Hills Formation water has also noted high levels of fluoride, more than 5 mg/L (Trapp and Croft, 1975). As such, the Fox Hills–Hell Creek system is typically not used as a primary source of drinking water. However, it is occasionally produced for irrigation and/or livestock watering.</p> <p>Based on the North Dakota State Water Commission (SWC) database, eight water wells penetrate the Fox Hills Formation in the AOR (Figure 3-13). One observation well monitored by the U.S. Geological Survey is located 1 mi east of Center, North Dakota, nearly 5 mi northwest of the McCall-1 injection site. One well is 5 mi northeast of the injection site along North Dakota Highway 25 and is used for stock. The status of the remaining six wells is under investigation. One well is about 9 mi southeast of the injection site near a legacy oil exploratory well and is permitted as an industrial well. Five wells lie to the southwest. Three wells are about 3, 11, and 12 mi from the injection site and are permitted as domestic water supply. The last two wells are located on adjacent sections 11 mi from the injection site; one is permitted for stock, and the other’s purpose is unknown.</p> <p>Multiple other freshwater-bearing units, primarily of Tertiary age, overlie the Fox Hills–Hell Creek aquifer system in the AOR (Figure 3-14). These formations are often used for domestic and agricultural purposes. The Cannonball and Tongue River Formations comprise the major aquifer units of the Fort Union Group, which overlies the Hell Creek Formation. The Cannonball Formation consists of interbedded sandstone, siltstone, claystone, and thin lignite beds of marine origin. The Tongue River Formation is predominantly sandstone interbedded with siltstone, claystone, lignite, and occasional carbonaceous shales. The basal sandstone member of the Tongue River is persistent and a reliable source of groundwater in the region. The thickness of this basal sand ranges from approximately 200 to 500 ft and directly underlies surficial glacial deposits in the area of investigation. Tongue River groundwaters are generally a sodium bicarbonate type with a TDS of approximately 1,000 ppm (Croft, 1973).</p> <p>The Sentinel Butte Formation, a silty fine-to-medium-grained sandstone with claystone and lignite interbeds, overlies the Tongue River Formation in the extreme western portion of the AOR. The Sentinel Butte Formation is predominantly sandstone with lignite interbeds. While the Sentinel Butte Formation is another important source of groundwater in the region, primarily to the west of the AOR, the Sentinel Butte is not a source of groundwater within the AOR. TDS in the Sentinel Butte Formation range from approximately 400–1,000 ppm (Croft, 1973).</p> <p>3.4.4 Protection for USDWs</p> <p>The Fox Hills–Hell Creek aquifer system is the lowest USDW in the AOR. The injection zone (Deadwood Formation) and lowest USDW (Fox Hills–Hell Creek aquifer system) are isolated geologically and hydrologically by multiple impermeable rock layers consisting of shale and carbonate formations of Ordovician, Silurian, Devonian, Carboniferous, Permian, Jurassic, and Cretaceous ages (Figure 3-9). The primary seal of the injection zone is the Ordovician-aged Icebox</p>	
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				<p>Formation with shales of the Ordovician-aged Roughlock and Stoughton, Mississippian–Devonian-aged Bakken, Permian-aged Opeche, Jurassic-aged Piper (Picard), Rierdon, and Swift Formations, all of which overlie the Icebox Formation. Above the Swift is the confined saltwater aquifer system of the Inyan Kara Formation, which extends across much of the Williston Basin. The Inyan Kara Formation will be monitored for temperature and pressure changes via fiber optic lines installed in the injection well, McCall-1 and the NRDT-1 monitoring well. Above the Inyan Kara Formation are the Cretaceous-aged shale formations, which are named the Skull Creek, Mowry, Belle Fourche, Greenhorn, Carlisle, Niobrara, and Pierre. The Pierre Formation is the thickest shale formation in the AOR and the primary geologic barrier between the USDWs and the injection zone. The geologic strata overlying the injection zone consist of multiple impermeable rock layers that are free of transmissive faults or fractures and provide adequate isolation of the USDWs from CO₂ injection activities in the AOR.</p>	
<p>NDAC 43-05-01-05 §1b(2)(d)</p>	<p>NDAC 43-05-01-05 §1b(2)(d) (d) An isopach map of the storage reservoirs;</p>	<p>NDAC 43-05-01-05 §1b(2)(d)</p>	<p>j. An isopach map of the storage reservoir(s);</p>	<p>Figure 2-10</p> <p>2.3 Storage Reservoir (Injection Zone)</p> <p>Regionally, the Black Island and Deadwood Formations are laterally extensive (Figure 2-8). The Black Island comprises high-energy shallow marine sandstone (permeable storage intervals) and shale (impermeable layers). The sandy members (C-sand and E member) of the Deadwood Formation comprise reworked quartz arenites of marginal marine environment (Figure 2-9). The Deadwood Formation unconformably overlies the Precambrian basement and is unconformably overlain by the sands of the Black Island Formation followed by the conformable Icebox Formation (Figure 2-3).</p> <p>At J-ROC1, the Deadwood C-sand member is made up of 50 ft of sandstone and is located at a depth of 9,548 ft. Across the model area, the Deadwood C-sand member varies in thickness from 40 to 88 ft, with an average thickness of 64 ft. Based on offset well data and geologic model characteristics, the Deadwood C-sand member is 100% sandstone. The Deadwood E member and Black Island Formations are made up of 69 ft of sandstone and 19 ft of dolostone and limestone at J-ROC1 and are located at a depth of 9,283 ft. Across the project area, the Deadwood E member varies in thickness from 0 to 139 ft, with an average thickness of 81 ft. The Black Island Formation varies in thickness from 14 to 77 ft, with an average of 36 ft. Based on offset well data and geologic model characteristics, the net reservoir thickness within the project area ranges from 63 to 287 ft, with an average of 165 ft (Figure 2-10).</p> <p>The well log signatures for the Black Island and Deadwood storage complex are consistent and predictable across the project area. The following are the correlation definitions used to indicate the reservoir and confining zones (Figure 2-11):</p> <ul style="list-style-type: none"> • The Icebox Formation is indicated at the transitions between a moderate GR, higher resistivity, low neutron, high density, and moderate compressional sonic for the base of the Roughlock Formation to the high GR, low resistivity, high neutron, high density, and high compressional sonic. The Icebox Formation is correlative across the project area. • The Black Island Formation is indicated by the transition from the Icebox Formation to a relatively low GR, low neutron, high density, and low compressional sonic. The Black Island has interbedded high-GR and moderate-resistivity sections. • The Deadwood Formation (Deadwood E member) is indicated by a transition from the base high GR signature of the Black Island Formation to a low GR signature, lower neutron, higher density, and lower compressional sonic. The Deadwood E thins from west to east across the project area. • The Deadwood D member (base of Deadwood E member) is indicated by a transition to moderate to higher GR from top to base, higher resistivity, low neutron, high density, and low to higher compressional sonic from top to base. • The Deadwood C member is the transition between the high GR of the Deadwood D member and moderate GR, higher resistivity, low neutron, high density, and low compressional sonic. The Deadwood C-sand member at the base of the Deadwood C member is indicated by a section of low GR (10 API), low resistivity, moderate neutron, moderate density, and moderate compressional sonic. • The Deadwood B member (base of Deadwood C-sand member) is indicated by the transition from a low GR signature of the Deadwood C-sand member to a high GR, higher resistivity, low neutron, high density, and higher compressional sonic. • The Deadwood B member shale unit is indicated by a higher GR, moderate resistivity, higher neutron, moderate density, and high compressional sonic. This unit is contained within the Deadwood B member and can be correlated across the project area. 	<p>Figure 2-10. Isopach map of the Black Island and Deadwood Formations in the simulation model extent.</p>

				<ul style="list-style-type: none"> The Precambrian basement is indicated by a change from low to relatively high GR, low-to-moderate resistivity, and a lower compressional sonic character that can be correlated across the project area. <p>Seismic data collected as part of site characterization efforts (Figure 2-6) were used to reinforce structural correlation and thickness estimations of the storage reservoir. The combined structural correlation and analyses indicate that there should be few-to-no major reservoir stratigraphic discontinuities near J-LOC1 and J-ROC1 (Figures 2-12a and 2-12b). The Deadwood E member pinches out 12.5 mi to the east of the J-ROC1 site. A structure map of the Deadwood and Black Island Formations shows no detectable features (e.g., folds, domes, or fault traps) with associated spill points in the project area (Figure 2-13).</p> <p><u>For additional information, go to section 2.3 of the Tundra SGS SFP.</u></p>	
NDAC 43-05-01-05 §1b(2)(e)	NDAC 43-05-01-05 §1b(2)(e) (e)An isopach map of the primary and any secondary containment barrier for the storage reservoir;	k. An isopach map of the primary containment barrier for the storage reservoir;		<p>Figure 2-31 and Figure 2-41</p> <p>2.4 Confining Zones The confining zones for the Deadwood and Black Island Formations are the overlying Icebox Formation and underlying Deadwood B member shale (Figure 2-3, Table 2-10). All three units, the Icebox Formation, Deadwood B member shale, and Precambrian basement, consist of impermeable rock layers.</p> <p>2.4.1 Upper Confining Zone In the Tundra SGS area, the Icebox consists of shale. This upper confining zone is laterally extensive across the project area (Figures 2-29 and 2-30) 9,308 ft below the land surface and 118 ft thick at the Tundra SGS site (Table 2-10 and Figure 2-31). The upper confining zone has sufficient areal extent and integrity to contain the injected CO₂. The upper confining zone is free of transmissive faults and fractures (Section 2.5). The contact between the underlying sandstone of the Black Island Formation is conformable and can be correlated across the project area. The transition from the Icebox to the Black Island is indicated by a relatively low GR, low neutron, high density, and low compressional sonic across the contact (Figure 2-32).</p> <p>Microfracture in situ stress tests were performed using the MDT tool in the J-LOC1 wellbore. Microfracture stress tests were attempted in the J-ROC1 well; however, because of extremely unstable wellbore conditions, the MDT stress tool run was not performed after a near loss of the tool in the wellbore.</p> <p>For the J-LOC1 well, in the Icebox Formation at 9,749.5 and 9,751.2 ft, the MDT tool was unable to cause a breakdown in the formation with an applied maximum injection pressure of 10,984.9 and 10,867.24 psi, respectively (Figures 2-33 and 2-34). The maximum injection pressure was limited by the dual-packer mechanical specifications having a set maximum differential pressure rating between the upper packer and hydrostatic pressure of 5,500 psi; see Appendix D, “Schlumberger Dual-Packer Module.” The inability to break down the Icebox Formation at the two depths indicated that the formation is very tight competent and exhibits sufficient geologic integrity to contain the injected CO₂ stream.</p> <p>The Icebox Formation was not suitable to collect competent core samples from the J-LOC1 well core for the purposes of porosity and permeability laboratory tests; the samples would crush in the equipment. The formation was found to be tight, and porosity and permeability estimates were derived from HPMT testing for one sample (Table 2-11). The lithology of the cored sections of the Icebox Formation is primarily shale, with minor pyrite.</p> <p>2.4.3 Lower Confining Zones The lower confining zone of the storage complex is the Deadwood B member shale. The Deadwood B member shale consists predominantly of shale with a consistent and correlative package of higher GR, moderate resistivity, higher neutron, moderate density, and high compressional sonic across the project area. The shale within the Deadwood B member is 9,791 ft below the surface and 34 ft thick at the Tundra SGS site (Figures 2-40 and 2-41, Table 2-10).</p> <p>At 144 ft below the top of the Deadwood C-sand is an 80-ft-thick shaly layer of the Deadwood B member. Data acquired from the core plug samples taken from the Deadwood B member show porosity values ranging from 1.55% to 2.63% and permeability values from 0.0083 to 0.0177 mD (Table 2-17).</p>	<p>Figure 2-31. Isopach map of the upper confining zone across the simulation model extent.</p> <p>Figure 2-41. Isopach map of the Deadwood B member shale across the Tundra SGS area.</p>

		<p>l. An isopach map of the secondary containment barrier for the storage reservoir;</p>	<p>Figure 2-38 and Figure 2-39</p> <p>2.4.2 Additional Overlying Confining Zones Several other formations provide additional confinement above the Icebox. Impermeable rocks above the primary seal include the Roughlock Formation and the Red River D member, which make up the first additional group of confining formations (Table 2-16). Together with the Icebox, these formations are 612 ft thick and will isolate the Deadwood/Black Island Formations fluids from migrating upward into the next permeable interval, the Red River A, B, and C members (see Figure 2-38). Above the Red River Formation, >1,000 ft of impermeable rocks act as an additional seal between the Red River and Broom Creek, the next proposed storage complex, 876 ft of impermeable rocks separate the Broom Creek from the Inyan Kara and an additional 2,545 ft of impermeable rocks separates the Inyan Kara and the lowermost USDW, the Fox Hills Formation (see Figure 2-39). Confining layers above the Inyan Kara include the Skull Creek, Newcastle, Mowry, Greenhorn, and Pierre Formations (Table 2-16).</p> <p>No known transmissible faults are within these confining systems in the project area. These formations between the Deadwood, Broom Creek, and Inyan Kara and between the Inyan Kara and lowest USDW have demonstrated the ability to prevent the vertical migration of fluids throughout geologic time and are recognized as impermeable flow barriers in the Williston Basin (Downey, 1986; Downey and Dinwiddie, 1988).</p> <p>Carbonates of the Red River A, B, and C members comprise the first unit with relatively high porosity and permeability above the injection zone and primary sealing formation. The Red River represents the most likely candidate to act as an overlying pressure dissipation zone. The depth to the Red River Formation in the project area is approximately 8,438 ft, and the formation itself is about 450 ft thick. In the unlikely event of out-of-zone migration through the primary and secondary sealing formations, CO₂ would become trapped in the Red River Formation. Monitoring DTS (distributed temperature sensor) data for the Red River Formation using the downhole fiber optic cable in the proposed monitor well provides an additional opportunity for mitigation and remediation (Section 4.0).</p>	<p>Figure 2-38. Isopach map of the interval between the top of the Black Island Formation and the top of the Swift Formation. This interval represents the primary and secondary confinement zones.</p> <p>Figure 2-39. Isopach map of the interval between the top of the Inyan Kara Formation and the top of the Pierre Formation. This interval represents the tertiary confinement zone.</p>
<p>NDAC 43-05-01-05 §1b(2)(f)</p>	<p>NDAC 43-05-01-05 §1b(2)(f) (f) A structure map of the top and base of the storage reservoirs;</p>	<p>m. A structure map of the top of the storage formation;</p>	<p>Figure 2-13 and Figure 2-30</p> <p>2.3 Storage Reservoir (Injection Zone) Regionally, the Black Island and Deadwood Formations are laterally extensive (Figure 2-8). The Black Island comprises high-energy shallow marine sandstone (permeable storage intervals) and shale (impermeable layers). The sandy members (C-sand and E member) of the Deadwood Formation comprise reworked quartz arenites of marginal marine environment (Figure 2-9). The Deadwood Formation unconformably overlies the Precambrian basement and is unconformably overlain by the sands of the Black Island Formation followed by the conformable Icebox Formation (Figure 2-3).</p> <p>At J-ROC1, the Deadwood C-sand member is made up of 50 ft of sandstone and is located at a depth of 9,548 ft. Across the model area, the Deadwood C-sand member varies in thickness from 40 to 88 ft, with an average thickness of 64 ft. Based on offset well data and geologic model characteristics, the Deadwood C-sand member is 100% sandstone. The Deadwood E member and Black Island Formations are made up of 69 ft of sandstone and 19 ft of dolostone and limestone at J-ROC1 and are located at a depth of 9,283 ft. Across the project area, the Deadwood E member varies in thickness from 0 to 139 ft, with an average thickness of 81 ft. The Black Island Formation varies in thickness from 14 to 77 ft, with an average of 36 ft. Based on offset well data and geologic model characteristics, the net reservoir thickness within the project area ranges from 63 to 287 ft, with an average of 165 ft (Figure 2-10).</p> <p>The well log signatures for the Black Island and Deadwood storage complex are consistent and predictable across the project area. The following are the correlation definitions used to indicate the reservoir and confining zones (Figure 2-11):</p> <ul style="list-style-type: none"> • The Icebox Formation is indicated at the transitions between a moderate GR, higher resistivity, low neutron, high density, and moderate compressional sonic for the base of the Roughlock Formation to the high GR, low resistivity, high neutron, high density, and high compressional sonic. The Icebox Formation is correlative across the project area. • The Black Island Formation is indicated by the transition from the Icebox Formation to a relatively low GR, low neutron, high density, and low compressional sonic. The Black Island has interbedded high-GR and moderate-resistivity sections. 	<p>Figure 2-13. Structure map of the Black Island and Deadwood Formations across the simulation model extent.</p> <p>Figure 2-30. Structure map of the upper confining zone across the simulation model extent.</p>

				<ul style="list-style-type: none"> • The Deadwood Formation (Deadwood E member) is indicated by a transition from the base high GR signature of the Black Island Formation to a low GR signature, lower neutron, higher density, and lower compressional sonic. The Deadwood E thins from west to east across the project area. • The Deadwood D member (base of Deadwood E member) is indicated by a transition to moderate to higher GR from top to base, higher resistivity, low neutron, high density, and low to higher compressional sonic from top to base. • The Deadwood C member is the transition between the high GR of the Deadwood D member and moderate GR, higher resistivity, low neutron, high density, and low compressional sonic. The Deadwood C-sand member at the base of the Deadwood C member is indicated by a section of low GR (10 API), low resistivity, moderate neutron, moderate density, and moderate compressional sonic. • The Deadwood B member (base of Deadwood C-sand member) is indicated by the transition from a low GR signature of the Deadwood C-sand member to a high GR, higher resistivity, low neutron, high density, and higher compressional sonic. • The Deadwood B member shale unit is indicated by a higher GR, moderate resistivity, higher neutron, moderate density, and high compressional sonic. This unit is contained within the Deadwood B member and can be correlated across the project area. • The Precambrian basement is indicated by a change from low to relatively high GR, low-to-moderate resistivity, and a lower compressional sonic character that can be correlated across the project area. <p>Seismic data collected as part of site characterization efforts (Figure 2-6) were used to reinforce structural correlation and thickness estimations of the storage reservoir. The combined structural correlation and analyses indicate that there should be few-to-no major reservoir stratigraphic discontinuities near J-LOC1 and J-ROC1 (Figures 2-12a and 2-12b). The Deadwood E member pinches out 12.5 mi to the east of the J-ROC1 site. A structure map of the Deadwood and Black Island Formations shows no detectable features (e.g., folds, domes, or fault traps) with associated spill points in the project area (Figure 2-13).</p> <p><u>For additional information, go to section 2.3 of the Tundra SGS SFP.</u></p> <p>2.4.1 Upper Confining Zone In the Tundra SGS area, the Icebox consists of shale. This upper confining zone is laterally extensive across the project area (Figures 2-29 and 2-30) 9,308 ft below the land surface and 118 ft thick at the Tundra SGS site (Table 2-10 and Figure 2-31). The upper confining zone has sufficient areal extent and integrity to contain the injected CO₂. The upper confining zone is free of transmissive faults and fractures (Section 2.5). The contact between the underlying sandstone of the Black Island Formation is conformable and can be correlated across the project area. The transition from the Icebox to the Black Island is indicated by a relatively low GR, low neutron, high density, and low compressional sonic across the contact (Figure 2-32).</p> <p>Microfracture in situ stress tests were performed using the MDT tool in the J-LOC1 wellbore. Microfracture stress tests were attempted in the J-ROC1 well; however, because of extremely unstable wellbore conditions, the MDT stress tool run was not performed after a near loss of the tool in the wellbore.</p> <p>For the J-LOC1 well, in the Icebox Formation at 9,749.5 and 9,751.2 ft, the MDT tool was unable to cause a breakdown in the formation with an applied maximum injection pressure of 10,984.9 and 10,867.24 psi, respectively (Figures 2-33 and 2-34). The maximum injection pressure was limited by the dual-packer mechanical specifications having a set maximum differential pressure rating between the upper packer and hydrostatic pressure of 5,500 psi; see Appendix D, “Schlumberger Dual-Packer Module.” The inability to break down the Icebox Formation at the two depths indicated that the formation is very tight competent and exhibits sufficient geologic integrity to contain the injected CO₂ stream.</p> <p>The Icebox Formation was not suitable to collect competent core samples from the J-LOC1 well core for the purposes of porosity and permeability laboratory tests; the samples would crush in the equipment. The formation was found to be tight, and porosity and permeability estimates were derived from HPMT testing for one sample (Table 2-11). The lithology of the cored sections of the Icebox Formation is primarily shale, with minor pyrite.</p>	
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			<p>n. A structure map of the base of the storage formation;</p>	<p>Figure 2-13 and Figure 2-40</p> <p>2.3 Storage Reservoir (Injection Zone)</p> <p>Regionally, the Black Island and Deadwood Formations are laterally extensive (Figure 2-8). The Black Island comprises high-energy shallow marine sandstone (permeable storage intervals) and shale (impermeable layers). The sandy members (C-sand and E member) of the Deadwood Formation comprise reworked quartz arenites of marginal marine environment (Figure 2-9). The Deadwood Formation unconformably overlies the Precambrian basement and is unconformably overlain by the sands of the Black Island Formation followed by the conformable Icebox Formation (Figure 2-3).</p> <p>At J-ROC1, the Deadwood C-sand member is made up of 50 ft of sandstone and is located at a depth of 9,548 ft. Across the model area, the Deadwood C-sand member varies in thickness from 40 to 88 ft, with an average thickness of 64 ft. Based on offset well data and geologic model characteristics, the Deadwood C-sand member is 100% sandstone. The Deadwood E member and Black Island Formations are made up of 69 ft of sandstone and 19 ft of dolostone and limestone at J-ROC1 and are located at a depth of 9,283 ft. Across the project area, the Deadwood E member varies in thickness from 0 to 139 ft, with an average thickness of 81 ft. The Black Island Formation varies in thickness from 14 to 77 ft, with an average of 36 ft. Based on offset well data and geologic model characteristics, the net reservoir thickness within the project area ranges from 63 to 287 ft, with an average of 165 ft (Figure 2-10).</p> <p>The well log signatures for the Black Island and Deadwood storage complex are consistent and predictable across the project area. The following are the correlation definitions used to indicate the reservoir and confining zones (Figure 2-11):</p> <ul style="list-style-type: none"> • The Icebox Formation is indicated at the transitions between a moderate GR, higher resistivity, low neutron, high density, and moderate compressional sonic for the base of the Roughlock Formation to the high GR, low resistivity, high neutron, high density, and high compressional sonic. The Icebox Formation is correlative across the project area. • The Black Island Formation is indicated by the transition from the Icebox Formation to a relatively low GR, low neutron, high density, and low compressional sonic. The Black Island has interbedded high-GR and moderate-resistivity sections. • The Deadwood Formation (Deadwood E member) is indicated by a transition from the base high GR signature of the Black Island Formation to a low GR signature, lower neutron, higher density, and lower compressional sonic. The Deadwood E thins from west to east across the project area. • The Deadwood D member (base of Deadwood E member) is indicated by a transition to moderate to higher GR from top to base, higher resistivity, low neutron, high density, and low to higher compressional sonic from top to base. • The Deadwood C member is the transition between the high GR of the Deadwood D member and moderate GR, higher resistivity, low neutron, high density, and low compressional sonic. The Deadwood C-sand member at the base of the Deadwood C member is indicated by a section of low GR (10 API), low resistivity, moderate neutron, moderate density, and moderate compressional sonic. • The Deadwood B member (base of Deadwood C-sand member) is indicated by the transition from a low GR signature of the Deadwood C-sand member to a high GR, higher resistivity, low neutron, high density, and higher compressional sonic. • The Deadwood B member shale unit is indicated by a higher GR, moderate resistivity, higher neutron, moderate density, and high compressional sonic. This unit is contained within the Deadwood B member and can be correlated across the project area. • The Precambrian basement is indicated by a change from low to relatively high GR, low-to-moderate resistivity, and a lower compressional sonic character that can be correlated across the project area. <p>Seismic data collected as part of site characterization efforts (Figure 2-6) were used to reinforce structural correlation and thickness estimations of the storage reservoir. The combined structural correlation and analyses indicate that there should be few-to-no major reservoir stratigraphic discontinuities near J-LOC1 and J-ROC1 (Figures 2-12a and 2-12b). The Deadwood E member pinches out 12.5 mi to the east of the J-ROC1 site. A structure map of the Deadwood and Black Island Formations shows no detectable features (e.g., folds, domes, or fault traps) with associated spill points in the project area (Figure 2-13).</p> <p><u>For additional information, go to section 2.3 of the Tundra SGS SFP.</u></p>	<p>Figure 2-13. Structure map of the Black Island and Deadwood Formations across the simulation model extent.</p> <p>Figure 2-40. Structure map of the Deadwood B member shale across the greater Tundra SGS area</p>
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				<p>2.4.3 Lower Confining Zones The lower confining zone of the storage complex is the Deadwood B member shale. The Deadwood B member shale consists predominantly of shale with a consistent and correlative package of higher GR, moderate resistivity, higher neutron, moderate density, and high compressional sonic across the project area. The shale within the Deadwood B member is 9,791 ft below the surface and 34 ft thick at the Tundra SGS site (Figures 2-40 and 2-41, Table 2-10).</p> <p>At 144 ft below the top of the Deadwood C-sand is an 80-ft-thick shaly layer of the Deadwood B member. Data acquired from the core plug samples taken from the Deadwood B member show porosity values ranging from 1.55% to 2.63% and permeability values from 0.0083 to 0.0177 mD (Table 2-17).</p>	
NDAC 43-05-01-05 §1b(2)(i)	NDAC 43-05-01-05 §1b(2)(i) (i) Structural and stratigraphic cross sections that describe the geologic conditions at the storage reservoir;	o. Structural cross sections that describe the geologic conditions at the storage reservoir;		<p>Figures 2-12a and 2-12b; and 2-14</p> <p>2.3 Storage Reservoir (Injection Zone) Regionally, the Black Island and Deadwood Formations are laterally extensive (Figure 2-8). The Black Island comprises high-energy shallow marine sandstone (permeable storage intervals) and shale (impermeable layers). The sandy members (C-sand and E member) of the Deadwood Formation comprise reworked quartz arenites of marginal marine environment (Figure 2-9). The Deadwood Formation unconformably overlies the Precambrian basement and is unconformably overlain by the sands of the Black Island Formation followed by the conformable Icebox Formation (Figure 2-3).</p> <p>At J-ROC1, the Deadwood C-sand member is made up of 50 ft of sandstone and is located at a depth of 9,548 ft. Across the model area, the Deadwood C-sand member varies in thickness from 40 to 88 ft, with an average thickness of 64 ft. Based on offset well data and geologic model characteristics, the Deadwood C-sand member is 100% sandstone. The Deadwood E member and Black Island Formations are made up of 69 ft of sandstone and 19 ft of dolostone and limestone at J-ROC1 and are located at a depth of 9,283 ft. Across the project area, the Deadwood E member varies in thickness from 0 to 139 ft, with an average thickness of 81 ft. The Black Island Formation varies in thickness from 14 to 77 ft, with an average of 36 ft. Based on offset well data and geologic model characteristics, the net reservoir thickness within the project area ranges from 63 to 287 ft, with an average of 165 ft (Figure 2-10).</p> <p>The well log signatures for the Black Island and Deadwood storage complex are consistent and predictable across the project area. The following are the correlation definitions used to indicate the reservoir and confining zones (Figure 2-11):</p> <ul style="list-style-type: none"> • The Icebox Formation is indicated at the transitions between a moderate GR, higher resistivity, low neutron, high density, and moderate compressional sonic for the base of the Roughlock Formation to the high GR, low resistivity, high neutron, high density, and high compressional sonic. The Icebox Formation is correlative across the project area. • The Black Island Formation is indicated by the transition from the Icebox Formation to a relatively low GR, low neutron, high density, and low compressional sonic. The Black Island has interbedded high-GR and moderate-resistivity sections. • The Deadwood Formation (Deadwood E member) is indicated by a transition from the base high GR signature of the Black Island Formation to a low GR signature, lower neutron, higher density, and lower compressional sonic. The Deadwood E thins from west to east across the project area. • The Deadwood D member (base of Deadwood E member) is indicated by a transition to moderate to higher GR from top to base, higher resistivity, low neutron, high density, and low to higher compressional sonic from top to base. • The Deadwood C member is the transition between the high GR of the Deadwood D member and moderate GR, higher resistivity, low neutron, high density, and low compressional sonic. The Deadwood C-sand member at the base of the Deadwood C member is indicated by a section of low GR (10 API), low resistivity, moderate neutron, moderate density, and moderate compressional sonic. • The Deadwood B member (base of Deadwood C-sand member) is indicated by the transition from a low GR signature of the Deadwood C-sand member to a high GR, higher resistivity, low neutron, high density, and higher compressional sonic. • The Deadwood B member shale unit is indicated by a higher GR, moderate resistivity, higher neutron, moderate density, and high compressional sonic. This unit is contained within the Deadwood B member and can be correlated across the project area. 	<p>Figure 2-12a. Regional well log stratigraphic cross sections of the Roughlock, Icebox, Black Island, and Deadwood Formations and the Precambrian basement flattened on the top of the Precambrian basement. Logs displayed in tracks from left to right are 1) GR (green) and caliper (red), 2) delta time (blue), and 3) interpreted lithology log.</p> <p>Figure 2-12b. Regional well log cross sections showing the structure of the Roughlock, Icebox, Black Island, and Deadwood Formations and the Precambrian basement. Logs displayed in tracks from left to right are 1) GR (green) and caliper (red) and 2) delta time (blue).</p> <p>Figure 2-14. Cross section of the Tundra SGS CO₂ storage complex from the geologic model showing lithofacies distribution in the Deadwood Formation. Depths are referenced to mean sea level.</p>

				<ul style="list-style-type: none"> The Precambrian basement is indicated by a change from low to relatively high GR, low-to-moderate resistivity, and a lower compressional sonic character that can be correlated across the project area. <p>Seismic data collected as part of site characterization efforts (Figure 2-6) were used to reinforce structural correlation and thickness estimations of the storage reservoir. The combined structural correlation and analyses indicate that there should be few-to-no major reservoir stratigraphic discontinuities near J-LOC1 and J-ROC1 (Figures 2-12a and 2-12b). The Deadwood E member pinches out 12.5 mi to the east of the J-ROC1 site. A structure map of the Deadwood and Black Island Formations shows no detectable features (e.g., folds, domes, or fault traps) with associated spill points in the project area (Figure 2-13).</p> <p><u>For additional information, go to section 2.3 of the Tundra SGS SFP.</u></p>	
			<p>p. Stratigraphic cross sections that describe the geologic conditions at the storage reservoir;</p>	<p>Figures 2-12a and 2-12b; and 2-14</p> <p>2.3 Storage Reservoir (Injection Zone)</p> <p>Regionally, the Black Island and Deadwood Formations are laterally extensive (Figure 2-8). The Black Island comprises high-energy shallow marine sandstone (permeable storage intervals) and shale (impermeable layers). The sandy members (C-sand and E member) of the Deadwood Formation comprise reworked quartz arenites of marginal marine environment (Figure 2-9). The Deadwood Formation unconformably overlies the Precambrian basement and is unconformably overlain by the sands of the Black Island Formation followed by the conformable Icebox Formation (Figure 2-3).</p> <p>At J-ROC1, the Deadwood C-sand member is made up of 50 ft of sandstone and is located at a depth of 9,548 ft. Across the model area, the Deadwood C-sand member varies in thickness from 40 to 88 ft, with an average thickness of 64 ft. Based on offset well data and geologic model characteristics, the Deadwood C-sand member is 100% sandstone. The Deadwood E member and Black Island Formations are made up of 69 ft of sandstone and 19 ft of dolostone and limestone at J-ROC1 and are located at a depth of 9,283 ft. Across the project area, the Deadwood E member varies in thickness from 0 to 139 ft, with an average thickness of 81 ft. The Black Island Formation varies in thickness from 14 to 77 ft, with an average of 36 ft. Based on offset well data and geologic model characteristics, the net reservoir thickness within the project area ranges from 63 to 287 ft, with an average of 165 ft (Figure 2-10).</p> <p>The well log signatures for the Black Island and Deadwood storage complex are consistent and predictable across the project area. The following are the correlation definitions used to indicate the reservoir and confining zones (Figure 2-11):</p> <ul style="list-style-type: none"> The Icebox Formation is indicated at the transitions between a moderate GR, higher resistivity, low neutron, high density, and moderate compressional sonic for the base of the Roughlock Formation to the high GR, low resistivity, high neutron, high density, and high compressional sonic. The Icebox Formation is correlative across the project area. The Black Island Formation is indicated by the transition from the Icebox Formation to a relatively low GR, low neutron, high density, and low compressional sonic. The Black Island has interbedded high-GR and moderate-resistivity sections. The Deadwood Formation (Deadwood E member) is indicated by a transition from the base high GR signature of the Black Island Formation to a low GR signature, lower neutron, higher density, and lower compressional sonic. The Deadwood E thins from west to east across the project area. The Deadwood D member (base of Deadwood E member) is indicated by a transition to moderate to higher GR from top to base, higher resistivity, low neutron, high density, and low to higher compressional sonic from top to base. The Deadwood C member is the transition between the high GR of the Deadwood D member and moderate GR, higher resistivity, low neutron, high density, and low compressional sonic. The Deadwood C-sand member at the base of the Deadwood C member is indicated by a section of low GR (10 API), low resistivity, moderate neutron, moderate density, and moderate compressional sonic. The Deadwood B member (base of Deadwood C-sand member) is indicated by the transition from a low GR signature of the Deadwood C-sand member to a high GR, higher resistivity, low neutron, high density, and higher compressional sonic. 	<p>Figure 2-12a. Regional well log stratigraphic cross sections of the Roughlock, Icebox, Black Island, and Deadwood Formations and the Precambrian basement flattened on the top of the Precambrian basement. Logs displayed in tracks from left to right are 1) GR (green) and caliper (red), 2) delta time (blue), and 3) interpreted lithology log.</p> <p>Figure 2-12b. Regional well log cross sections showing the structure of the Roughlock, Icebox, Black Island, and Deadwood Formations and the Precambrian basement. Logs displayed in tracks from left to right are 1) GR (green) and caliper (red) and 2) delta time (blue).</p> <p>Figure 2-14. Cross section of the Tundra SGS CO₂ storage complex from the geologic model showing lithofacies distribution in the Deadwood Formation. Depths are referenced to mean sea level.</p>

				<ul style="list-style-type: none"> • The Deadwood B member shale unit is indicated by a higher GR, moderate resistivity, higher neutron, moderate density, and high compressional sonic. This unit is contained within the Deadwood B member and can be correlated across the project area. • The Precambrian basement is indicated by a change from low to relatively high GR, low-to-moderate resistivity, and a lower compressional sonic character that can be correlated across the project area. <p>Seismic data collected as part of site characterization efforts (Figure 2-6) were used to reinforce structural correlation and thickness estimations of the storage reservoir. The combined structural correlation and analyses indicate that there should be few-to-no major reservoir stratigraphic discontinuities near J-LOC1 and J-ROC1 (Figures 2-12a and 2-12b). The Deadwood E member pinches out 12.5 mi to the east of the J-ROC1 site. A structure map of the Deadwood and Black Island Formations shows no detectable features (e.g., folds, domes, or fault traps) with associated spill points in the project area (Figure 2-13).</p> <p>For additional information, go to section 2.3 of the Tundra SGS SFP.</p>	
NDAC 43-05-01-05 §1b(2)(h)	NDAC 43-05-01-05 §1b(2)(h) (h) Evaluation of the pressure front and the potential impact on underground sources of drinking water, if any;	q. Evaluation of the pressure front and the potential impact on underground sources of drinking water, if any;		<p>3.1 Area of Review Delineation</p> <p>3.1.1 Written Description</p> <p>North Dakota carbon dioxide (CO₂) storage regulations require that each storage facility permit delineate an area of review (AOR), which is defined as “the region surrounding the geologic storage project where underground sources of drinking water (USDWs) may be endangered by the injection activity” (North Dakota Administrative Code [NDAC] § 43-05-01-01[4]). Concern regarding the endangerment of USDWs is related to the potential vertical migration of CO₂ and/or brine from the injection zone to the USDW. Therefore, the AOR encompasses the region overlying the injected free-phase CO₂ and the region overlying the extent of formation fluid pressure (Figure 3-1) increase sufficient to drive formation fluids (e.g., brine) into USDWs, assuming pathways for this migration (e.g., abandoned wells or fractures) are present. The minimum fluid pressure increase in the reservoir that results in a sustained flow of brine upward into an overlying drinking water aquifer is referred to as the “critical threshold pressure increase” and resultant pressure as the “critical threshold pressure.” Application of the U.S. Environmental Protection Agency (EPA) method shows the critical threshold pressure increase at the top of the Deadwood Formation using site-specific data from J-ROC1 was determined to be 127 psi (Appendix A, Table A-4).</p> <p>Appendix A includes a detailed discussion on the computational modeling and simulations (e.g., CO₂ plume extent, pressure front, AOR boundary, etc.), assumptions, and justification used to delineate the AOR and method for delineation of the AOR.</p> <p>NDAC § 43-05-01-05 subsection 1(b)(3) requires, “A review of the data of public record, conducted by a geologist or engineer, for all wells within the facility area, which penetrate the storage reservoir or primary or secondary seals overlying the reservoir, and all wells within the facility area and within one mile [1.61 kilometers], or any other distance as deemed necessary by the commission, of the facility area boundary.” Based on the computational methods used to simulate CO₂ injection activities and associated pressure front (Figure 3-1), the resulting AOR for Tundra SGS is delineated as being 1 mi beyond the storage facility area boundary. This extent ensures compliance with existing state regulations.</p> <p>All wells located in the AOR that penetrate the storage reservoir and its primary overlying seal were evaluated (Figures 3-2 through 3-5) by a professional engineer pursuant to NDAC § 43-05-01-05 subsection 1(b)(3). The evaluation was performed to determine if corrective action is required and included a review of all available well records (Table 3-1). The evaluation determined that all abandoned wells within the AOR have sufficient isolation to prevent formation fluids or injected CO₂ from vertically migrating outside of the storage reservoir or into USDWs and that no corrective action is necessary (Tables 3-2 through 3-5 and Figures 3-6 through 3-8).</p> <p>An extensive geologic and hydrogeologic characterization performed by a team of geologists from the Energy & Environmental Research Center (EERC) resulted in no evidence of transmissive faults or fractures in the upper confining zone within the AOR and revealed that the upper confining zone has sufficient geologic integrity to prevent vertical fluid movement. All geologic data and investigations indicate the storage reservoir within the AOR has sufficient containment and geologic integrity, including geologic confinement above and below the injection zone, to prevent vertical fluid movement.</p>	<p>Table A-5. EPA Method 1 Critical Threshold Pressure Increase Calculated at the J-ROC1 Wellbore Location</p> <p>Figure A-20. Final AOR estimations of the Tundra SGS storage facility area in relation to nearby legacy wells. Shown is the storage facility area (purple boundary and shaded area), area of review (gray boundary and shaded area), and Center city limits (dotted yellow boundary). Orange circles represent legacy wells near the storage facility area.</p> <p>Figure A-21. Land use in and around the AOR of the Tundra SGS storage facility.</p>

This section of the storage facility permit application is accompanied by maps and tables that include information required and in accordance with NDAC §§ 43-05-01-05 subsections 1(a) and 1(b) and 43-05-01-05.1 subsection 2, such as the storage facility area, location of any proposed injection wells or monitoring wells, presence of significant surface structures or land disturbances, and location of water wells and any other wells within the AOR. Table 3-1 lists all the surface and subsurface features that were investigated as part of the AOR evaluation, pursuant to NDAC §§ 43-05-01-05 subsections 1(a) and 1(b)(3) and 43-05-01-05.1 subsection 2. Surface features that were investigated but not found within the AOR boundary were identified in Table 3-1.

Appendix A – DATA, PROCESSING, AND OUTCOMES OF CO₂ STORAGE GEOMODELING AND SIMULATIONS

Delineation of AOR

The AOR is defined as the region surrounding the geologic storage project where USDWs may be endangered by CO₂ injection activity (North Dakota Administrative Code [NDAC] § 43-05-01-05). The primary endangerment risk is due to the potential for vertical migration of CO₂ and/or formation fluids to a USDW from the storage reservoir. Therefore, the AOR encompasses the region overlying the extent of reservoir fluid pressure increase sufficient to drive formation fluids (e.g., brine) into a USDW, assuming pathways for this migration (e.g., abandoned wells or fractures) are present. The minimum pressure increase in the reservoir that results in a sustained flow of brine upward into an overlying drinking water aquifer is referred to as the “critical threshold pressure increase” and the resultant pressure as the “critical threshold pressure.” The U.S. Environmental Protection Agency (EPA) guidance for AOR delineation under the Underground Injection Control (UIC) Program for Class VI wells provides several methods for estimating the critical threshold pressure increase and the resulting critical threshold pressure.

EPA (2013) Method 1 (pressure front based on bringing injection zone and USDW to equivalent hydraulic heads) is presented as a method for determining whether a storage reservoir is in hydrostatic equilibrium with the lowest USDW (Thornhill and others, 1982). Under Method 1, the increase in pressure (ΔP) that may be sustained in the injection zone (critical pressure threshold) is given by:

$$\Delta P_{i,f} = P_u + \rho_i g \cdot (z_u - z_i) - P_i \quad [\text{Eq. 1}]$$

where P_u is the initial fluid pressure in the USDW, ρ_i is the storage reservoir fluid density (mg/m^3), g is the acceleration due to gravity (m/s^2), z_u is the representative elevation of the USDW (m amsl), z_i is the representative elevation of the injection zone (m amsl), P_i is the initial pressure in the injection zone (Pa), and $\Delta P_{i,f}$ is the critical pressure threshold.

Equation 1 assumes that the hypothetical open borehole is perforated exclusively within the injection zone and USDW. If $\Delta P_{i,f} = 0$, then the reservoir and USDW are in hydrostatic equilibrium; if $\Delta P_{i,f} > 0$, then the reservoir is underpressurized relative to the USDW, and if $\Delta P_{i,f} < 0$, then the reservoir is overpressurized relative to the USDW. In the case of $\Delta P_{i,f} > 0$, the value of $\Delta P_{i,f}$ represents the amount of pressure increase that can be accommodated in the storage reservoir before brine would flow into the lowest USDW.

Critical Threshold Pressure Increase Estimation at J-ROC1 For the purposes of delineating the $\Delta P_{i,f}$ for the Tundra SGS study area, constant fluid densities for the lowermost USDW (the Fox Hills Formation) and the injection zone (the Deadwood Formation) were used. A density of 1,001 kg/m^3 was used to represent the USDW fluids, and a density of 1,177 kg/m^3 , which is estimated based on the in situ brine salinity, temperature, and pressure, was used to represent injection zone fluids.

Critical pressure threshold increases were calculated for the proposed storage reservoir at a range of depths across the reservoir using Equation 1, formation depths and thicknesses from J-ROC1, and fluid density values from the nearby J-LOC1 stratigraphic test well (Table A-5). Using this method, the critical threshold pressure increase ($\Delta P_{i,f}$) at the top of the Deadwood Formation at the J-ROC1 well was determined to be 127 psi. Because $\Delta P_{i,f} > 0$, the value of $\Delta P_{i,f}$ represents the amount of pressure increase that can be accommodated in the storage reservoir before brine would flow into the lowest USDW.

Calculations of critical threshold pressure increase were compared to potential pressure increases within the storage facility area that would result from CO₂ injection and the potential lateral extent of the injection fluid as determined by predictive simulations. Table A-5 provides estimates of $\Delta P_{i,f}$ for various depths within the Deadwood Formation at J-

				<p>ROC1. The same calculations were applied to the geologic model to determine $\Delta P_{i,f}$ for each cell, values from which were then compared against the difference in pressure predicted for each cell in the simulation model at the end of injection (time of greatest increase in pressure since the beginning of simulated injection). A defined area of the simulation model around the injection well displays a 20-year pressure increase (ΔP) that is greater than the calculated $\Delta P_{i,f}$ for the cells in that area. The boundary between where $\Delta P_{i,f} > \Delta P$ and where $\Delta P_{i,f} < \Delta P$ delineates the line of critical threshold pressure increase and must be accounted for—in conjunction with the CO₂ areal extent—when determining AOR.</p> <p>The storage reservoir is the maximum extent of the injected CO₂ or the maximum extent of the critical pressure, whichever is greater. At Tundra SGS, the line of critical threshold pressure increase plus 1 mile is the AOR, because the maximum extent of critical pressure is larger than the maximum extent of the injected CO₂. As shown in Figure A-20, the AOR is depicted by the gray shaded area, which includes the storage facility area (purple shaded area). Figure A-21 illustrates the land use within the AOR.</p>	
NDAC 43-05-01-05 §1b(2)(l)	NDAC 43-05-01-05 §1b(2)(l)	(l) Geomechanical information on fractures, stress, ductility, rock strength, and in situ fluid pressures within the confining zone. The confining zone must be free of transmissive faults or fractures and of sufficient areal extent and integrity to contain the injected carbon dioxide stream;	<p>r. Geomechanical information on the confining zone. The confining zone must be free of transmissive faults or fractures and of sufficient areal extent and integrity to contain the injected carbon dioxide:</p> <ul style="list-style-type: none"> Fractures Stress Ductility Rock strength In situ fluid pressure 	<p>2.4.4 Geomechanical Information of Confining Zone</p> <p>2.4.4.1 Fracture Analysis Fractures within the Icebox Formation, the overlying confining zone, and Deadwood B Formation, the underlying confining zone, have been assessed during the description of the J-LOC1 well core. Observable fractures were categorized by attributes, including morphology, orientation, aperture, and origin. Secondly, natural, in situ fractures were assessed through the interpretation of Schlumberger’s Quanta Geo log acquired during the drilling of the J-LOC1 well.</p> <p>2.4.4.2 Fracture Analysis Core Description Features within the Icebox Formation are primarily related to the compaction. There is no presence of natural fractures. Only the stylolites which are compaction-related exist; they vary in orientation and exhibit mainly horizontal and rare oblique trends.</p> <p>In the Deadwood B Formation, rare closed-tension fractures were observed in the core interval and are commonly coincident with the observed horizontal compaction features (stylolite). Quartz is the dominant mineral found to fill observable fractures. The stylolites are well-represented, vary in orientation, and exhibit mainly a horizontal trend.</p> <p>2.4.4.3 Borehole Image Fracture Analysis (FMI) Schlumberger’s Quanta Geo log was chosen to evaluate the geomechanical condition of the formation in the subsurface. This log provides a 360-degree image of the formation of interest and can be oriented to provide an understanding of the general direction of features observed.</p> <p>Figures 2-46 and 2-47 show two sections of the interpreted borehole imagery and primary features observed. The far-right track on Figure 2-46 demonstrates that the tool provides information on surface boundaries and bedding features and notes the presence of electrically conductive features that characterize the Icebox Formation. These are interpreted as stylolites. Figure 2-47 reveals the features that are clay-filled because of their electrically conductive signal. The logged interval of the Deadwood B shows that the main features present are stylolites, which are an indication that the formation has undergone a reduction in porosity in response to postdepositional stress.</p> <p>The diagrams shown in Figures 2-48 and 2-49 provide the orientation of the electrically conductive features in the Icebox and Deadwood B Formations, respectively. As shown, the electrically conductive features are stylolites and have no preferred orientation.</p> <p>Drilling-induced fractures were not identified either in the Icebox or Deadwood B Formations. However, breakouts were highlighted in the Precambrian basement and are oriented northwest–southeast (Figure 2-50), which is perpendicular to the maximum horizontal stress (SHmax).</p> <p>2.4.4.4 Stress During drilling of the J-LOC1 well, an openhole MDT microfracture in situ stress test was completed to determine a formation breakdown pressure and minimum horizontal stress. The microfracture in situ stress test operation was performed using the MDT dual-packer module to obtain the formation breakdown pressure followed by multiple injection–falloff cycles to determine formation geomechanics properties. Within the Icebox Formation confining zone, two attempts were made at a depth of 9,749.51 and 9,751.19 ft to determine the formation breakdown pressure and closure pressure, which corresponds to the minimum horizontal stress. Unfortunately, these attempts were unsuccessful to achieve the</p>	<p>Figure 2-46. Examples of the interpreted Quanta Geo log for the J-LOC1 well. This example shows the common feature types seen in the Icebox Quanta Geo borehole image analysis.</p> <p>Figure 2-47. Examples of the interpreted Quanta Geo log for the J-LOC1 well. This example shows the common feature types seen in the Deadwood B Quanta Geo borehole image analysis.</p> <p>Figure 2-48. This example shows stylolites seen in the Icebox Formation.</p> <p>Figure 2-49. This example shows stylolites seen in the Deadwood B Formation.</p> <p>Figure 2-50. Breakout dip orientation in the Precambrian basement.</p> <p>Figure 2-51. J-LOC1 Icebox MDT microfracture in situ stress test (first attempt) at 9,749.51 ft.</p> <p>Figure 2-52. J-LOC1 Icebox MDT microfracture in situ stress test (second attempt) at 9,751.19 ft.</p> <p>Table 2-21. Summary of Stresses in Icebox Formation</p> <p>Figure 2-53. 1D MEM of the Icebox Formation.</p> <p>Figure 2-54. Results of multistage triaxial test performed at confining pressures exceeding 40 MPa (5,800 psi), providing information regarding the elastic parameters and peak strength of the rock sample. Failure occurred at the fourth-stage peak stress of 121.8 MPa.</p> <p>Table 2-22. Sample Parameters</p>

				<p>formation breakdown pressure with an applied maximum injection pressure of 10984.9 and 10867.24 psi (Figure 2-51 and Figure 2-52). The maximum injection pressure was limited by the dual-packer mechanical specifications having a set maximum differential pressure rating between the upper packer and hydrostatic pressure of 5,500 psi; see Appendix D, “Schlumberger Dual-Packer Module.”</p> <p>J-LOC1 openhole logging data were used to construct a 1D mechanical earth model (MEM) for different formations, including the Icebox Formation. The data available were loaded and quality-checked using Techlog software, where the overburden stress and pore pressure were estimated and calibrated with available MDT data. The elastic properties such as Young’s modulus, Poisson’s ratio, Shear modulus, and Bulk modulus were calculated based on the available well logs. The formation strength properties like uniaxial compressive strength (UCS), tensile strength, friction angle, and cohesion were also estimated from the available data (Figure 2-53). Table 2-21 provides the summary of stresses in the Icebox Formation generated using the 1D MEM.</p> <p><i>2.4.4.5 Ductility and Rock Strength</i></p> <p>Ductility and rock strength have been determined through laboratory testing of rock samples acquired from the Icebox and Deadwood B Formation cores in the J-LOC1. Icebox Formation samples were not testable. Plugs failed under minor stress because of the fissility of the rock. On the other hand, one sample from the Deadwood B Formation was tested and characterized by a porosity equal to 1.4% and a permeability of 0.001 mD. To determine these parameters, a multistage triaxial test was performed at confining pressures exceeding 40 MPa (5801.51 psi). This commonly used test provides information regarding the elastic parameters and peak strength of a material (Figure 2-54). Table 2-22 shows the sample parameters, while Tables 2-23 and 2-24 show the elastic, dynamic, and velocity parameters obtained at different confining pressures.</p> <p>Appendix A - DATA, PROCESSING, AND OUTCOMES OF CO₂ STORAGE GEOMODELING AND SIMULATIONS</p> <p>Table A-2. MDT Pressure Measurements Recorded from the J-LOC1 Well and Derived Formation Pressure Gradients</p> <table border="1" data-bbox="1342 1003 2511 1185"> <thead> <tr> <th>Test Depth, ft MD*</th> <th>Formation Pressure, psi</th> <th>Formation Pressure Gradient, psi/ft</th> </tr> </thead> <tbody> <tr> <td>9,800</td> <td>4,507</td> <td>0.46</td> </tr> <tr> <td>9,885</td> <td>4,548</td> <td>0.46</td> </tr> <tr> <td>9,885</td> <td>4,548</td> <td>0.46</td> </tr> <tr> <td>10,087</td> <td>4,651</td> <td>0.46</td> </tr> <tr> <td>10,254</td> <td>4,734</td> <td>0.46</td> </tr> </tbody> </table> <p>Table A-3. Summary of Reservoir Properties in the Simulation Model</p> <table border="1" data-bbox="1299 1272 2489 1461"> <thead> <tr> <th>Average Permeability, mD</th> <th>Average Porosity, %</th> <th>Initial Pressure, P_i, psi</th> <th>Salinity, ppm</th> <th>Boundary Condition</th> </tr> </thead> <tbody> <tr> <td>Icebox: 7.25 × 10⁻⁷</td> <td>Icebox: ~0.12</td> <td rowspan="4">~4,548.42</td> <td rowspan="4">256,000</td> <td rowspan="4">Open (infinite-acting)</td> </tr> <tr> <td>Black Island: 9.81</td> <td>Black Island: ~5.48</td> </tr> <tr> <td>Deadwood: 31.65</td> <td>Deadwood: ~3.81</td> </tr> <tr> <td>Precambrian: 7.88 × 10⁻⁷</td> <td>Precambrian: ~0.74</td> </tr> </tbody> </table>	Test Depth, ft MD*	Formation Pressure, psi	Formation Pressure Gradient, psi/ft	9,800	4,507	0.46	9,885	4,548	0.46	9,885	4,548	0.46	10,087	4,651	0.46	10,254	4,734	0.46	Average Permeability, mD	Average Porosity, %	Initial Pressure, P _i , psi	Salinity, ppm	Boundary Condition	Icebox: 7.25 × 10 ⁻⁷	Icebox: ~0.12	~4,548.42	256,000	Open (infinite-acting)	Black Island: 9.81	Black Island: ~5.48	Deadwood: 31.65	Deadwood: ~3.81	Precambrian: 7.88 × 10 ⁻⁷	Precambrian: ~0.74	<p>Table 2-23. Elastic Properties Obtained Through Experimentation: E = Young’s Modulus, n = Poisson’s Ratio, K = Bulk Modulus, G = Shear Modulus, P = Uniaxial Strain Modulus</p> <p>Table 2-24. Velocity and Dynamic Properties Obtained Through Experimentation: V_p = P-Wave Velocity, V_s = Shear Wave Velocity, E = Young’s Modulus, n = Poisson’s Ratio</p>
Test Depth, ft MD*	Formation Pressure, psi	Formation Pressure Gradient, psi/ft																																					
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Icebox: 7.25 × 10 ⁻⁷	Icebox: ~0.12	~4,548.42	256,000	Open (infinite-acting)																																			
Black Island: 9.81	Black Island: ~5.48																																						
Deadwood: 31.65	Deadwood: ~3.81																																						
Precambrian: 7.88 × 10 ⁻⁷	Precambrian: ~0.74																																						
NDAC 43-05-01-05 §1b(2)(o)	NDAC 43-05-01-05 §1b(2)(o)	(o) Identify and characterize additional strata overlying the storage reservoir that will prevent vertical fluid movement, are free of transmissive faults or fractures, allow for pressure dissipation, and	s. Identify and characterize additional strata overlying the storage reservoir that will prevent vertical fluid movement: Free of transmissive faults Free of transmissive fractures Effect on pressure dissipation Utility for monitoring, mitigation, and remediation.	<p><i>2.4.2 Additional Overlying Confining Zones</i></p> <p>Several other formations provide additional confinement above the Icebox. Impermeable rocks above the primary seal include the Roughlock Formation and the Red River D member, which make up the first additional group of confining formations (Table 2-16). Together with the Icebox, these formations are 612 ft thick and will isolate the Deadwood/Black Island Formations fluids from migrating upward into the next permeable interval, the Red River A, B, and C members (see Figure 2-38). Above the Red River Formation, >1,000 ft of impermeable rocks act as an additional seal between the Red River and Broom Creek, the next proposed storage complex, 876 ft of impermeable rocks separate the Broom Creek from the Inyan Kara and an additional 2,545 ft of impermeable rocks separates the Inyan Kara and the lowermost USDW, the Fox Hills Formation (see Figure 2-39). Confining layers above the Inyan Kara include the Skull Creek, Newcastle, Mowry, Greenhorn, and Pierre Formations (Table 2-16).</p>	<p>Table 2-16. Description of Zones of Confinement above the Immediate Upper Confining Zone (data based on the J-ROC1 well)</p> <p>Figure 2-38. Isopach map of the interval between the top of the Black Island Formation and the top of the Swift Formation. This interval represents the primary and secondary confinement zones.</p>																																		

provide additional opportunities for monitoring, mitigation, and remediation.

No known transmissible faults are within these confining systems in the project area. These formations between the Deadwood, Broom Creek, and Inyan Kara and between the Inyan Kara and lowest USDW have demonstrated the ability to prevent the vertical migration of fluids throughout geologic time and are recognized as impermeable flow barriers in the Williston Basin (Downey, 1986; Downey and Dinwiddie, 1988).

Carbonates of the Red River A, B, and C members comprise the first unit with relatively high porosity and permeability above the injection zone and primary sealing formation. The Red River represents the most likely candidate to act as an overlying pressure dissipation zone. The depth to the Red River Formation in the project area is approximately 8,438 ft, and the formation itself is about 450 ft thick. In the unlikely event of out-of-zone migration through the primary and secondary sealing formations, CO₂ would become trapped in the Red River Formation. Monitoring DTS (distributed temperature sensor) data for the Red River Formation using the downhole fiber optic cable in the proposed monitor well provides an additional opportunity for mitigation and remediation (Section 4.0).

Table 2-16. Description of Zones of Confinement above the Immediate Upper Confining Zone (data based on the J-ROC1 well)

Name of Formation	Lithology	Formation Top Depth, ft	Thickness, ft	Depth below Lowest Identified USDW, ft
Pierre	Shale	1,150	1862	0
Greenhorn	Shale	3,012	391	1,862
Mowry	Shale	3,403	56	2,253
Skull Creek	Shale	3,458	235	2,308
Swift	Shale	3,864	473	2,714
Rierdon	Shale	4,337	147	3,187
Piper (Kline member)	Limestone	4,484	110	3,334
Piper (Picard)	Shale	4,594	91	3,444
Opeche	Shale/mudstone	4,685	55	3,535
Amsden	Dolostone/anhydrite	4,974	247	3,824
Kibbey Lime	Limestone	5,384	31	4,234
Charles	Limestone/anhydrite	5,526	147	4,376
Bakken	Shale	6,926	10	5,776
Birdbear	Limestone	7,075	74	5,925
Duperow	Limestone/dolostone	7,149	272	5,999
Souris River	Dolostone/limestone	7,421	175	6,271
Dawson Bay	Dolostone	7,596	729	6,446
Gunton	Dolostone/limestone	8,325	39	7,175
Stoughton	Shale/limestone	8,364	91	7,214
Lower Red River	Limestone	8,645	488	7,495
Roughlock	Shale/limestone	9,133	25	7,983

Figure 2-39. Isopach map of the interval between the top of the Inyan Kara Formation and the top of the Pierre Formation. This interval represents the tertiary confinement zone.

<p>Area of Review Delineation</p>	<p>NDAC 43-05-01-05 §1j & §1b(3)</p>	<p>NDAC 43-05-01-05 §1j j. An area of review and corrective action plan that meets the requirements pursuant to section 43-05-01-05.1;</p> <p>NDAC 43-05-01-05 §1b(3) (3) A review of the data of public record, conducted by a geologist or engineer, for all wells within the facility area, which penetrate the storage reservoir or primary or secondary seals overlying the reservoir, and all wells within the facility area and within one mile [1.61 kilometers], or any other distance as deemed necessary by the commission, of the facility area boundary. The review must include the following:</p>	<p>The carbon dioxide storage reservoir area of review includes the areal extent of the storage reservoir and one mile outside of the storage reservoir boundary, plus the maximum extent of the pressure front caused by injection activities. The area of review delineation must include the following:</p>	<p>3.0 AREA OF REVIEW</p> <p>3.1 AOR Delineation</p> <p>3.1.1 Written Description North Dakota carbon dioxide (CO₂) storage regulations require that each storage facility permit delineate an area of review (AOR), which is defined as “the region surrounding the geologic storage project where underground sources of drinking water (USDWs) may be endangered by the injection activity” (North Dakota Administrative Code [NDAC] § 43-05-01-01[4]). Concern regarding the endangerment of USDWs is related to the potential vertical migration of CO₂ and/or brine from the injection zone to the USDW. Therefore, the AOR encompasses the region overlying the injected free-phase CO₂ and the region overlying the extent of formation fluid pressure (Figure 3-1) increase sufficient to drive formation fluids (e.g., brine) into USDWs, assuming pathways for this migration (e.g., abandoned wells or fractures) are present. The minimum fluid pressure increase in the reservoir that results in a sustained flow of brine upward into an overlying drinking water aquifer is referred to as the “critical threshold pressure increase” and resultant pressure as the “critical threshold pressure.” Application of the U.S. Environmental Protection Agency (EPA) method shows the critical threshold pressure increase at the top of the Deadwood Formation using site-specific data from J-ROC1 was determined to be 127 psi (Appendix A, Table A-4).</p> <p>Appendix A includes a detailed discussion on the computational modeling and simulations (e.g., CO₂ plume extent, pressure front, AOR boundary, etc.), assumptions, and justification used to delineate the AOR and method for delineation of the AOR.</p> <p>NDAC § 43-05-01-05 subsection 1(b)(3) requires, “A review of the data of public record, conducted by a geologist or engineer, for all wells within the facility area, which penetrate the storage reservoir or primary or secondary seals overlying the reservoir, and all wells within the facility area and within one mile [1.61 kilometers], or any other distance as deemed necessary by the commission, of the facility area boundary.” Based on the computational methods used to simulate CO₂ injection activities and associated pressure front (Figure 3-1), the resulting AOR for Tundra SGS is delineated as being 1 mi beyond the storage facility area boundary. This extent ensures compliance with existing state regulations.</p> <p>All wells located in the AOR that penetrate the storage reservoir and its primary overlying seal were evaluated (Figures 3-2 through 3-5) by a professional engineer pursuant to NDAC § 43-05-01-05 subsection 1(b)(3). The evaluation was performed to determine if corrective action is required and included a review of all available well records (Table 3-1). The evaluation determined that all abandoned wells within the AOR have sufficient isolation to prevent formation fluids or injected CO₂ from vertically migrating outside of the storage reservoir or into USDWs and that no corrective action is necessary (Tables 3-2 through 3-5 and Figures 3-6 through 3-8).</p> <p>An extensive geologic and hydrogeologic characterization performed by a team of geologists from the Energy & Environmental Research Center (EERC) resulted in no evidence of transmissive faults or fractures in the upper confining zone within the AOR and revealed that the upper confining zone has sufficient geologic integrity to prevent vertical fluid movement. All geologic data and investigations indicate the storage reservoir within the AOR has sufficient containment and geologic integrity, including geologic confinement above and below the injection zone, to prevent vertical fluid movement.</p> <p>This section of the storage facility permit application is accompanied by maps and tables that include information required and in accordance with NDAC §§ 43-05-01-05 subsections 1(a) and 1(b) and 43-05-01-05.1 subsection 2, such as the storage facility area, location of any proposed injection wells or monitoring wells, presence of significant surface structures or land disturbances, and location of water wells and any other wells within the AOR. Table 3-1 lists all the surface and subsurface features that were investigated as part of the AOR evaluation, pursuant to NDAC §§ 43-05-01-05 subsections 1(a) and 1(b)(3) and 43-05-01-05.1 subsection 2. Surface features that were investigated but not found within the AOR boundary were identified in Table 3-1.</p> <p>See Appendix A – DATA, PROCESSING, AND OUTCOMES OF CO₂ STORAGE GEOMODELING AND SIMULATIONS.</p>	
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	<p>NDAC 43-05-01-05 §1b(3) & §1a</p>	<p>NDAC 43-05-01-05 §1b(3) (3) A review of the data of public record, conducted by a geologist or engineer, for all wells within the facility area, which penetrate the storage reservoir or primary or secondary seals overlying the reservoir, and all wells within the facility area and within one mile [1.61 kilometers], or any other distance as deemed necessary by the commission, of the facility area boundary. The review must include the following:</p> <p>NDAC 43-05-01-05 §1a a. A site map showing the boundaries of the storage reservoir and the location of all proposed wells, proposed cathodic protection boreholes, and surface facilities within the carbon dioxide storage facility area;</p>	<p>a. A map showing the following within the carbon dioxide reservoir area:</p> <ul style="list-style-type: none"> i. Boundaries of the storage reservoir ii. Location of all proposed wells iii. Location of proposed cathodic protection boreholes iv. Any existing or proposed above ground facilities; 	<p>3.1.2 Supporting Maps</p>	<p>Figure 3-2. Final AOR map showing the storage facility area and AOR boundaries. The black circles represent occupied dwellings, and yellow boundaries represent buildings.</p>
	<p>NDAC 43-05-01-05 §1b(2)(a)</p>	<p>NDAC 43-05-01-05 §1b(2)(a) (a) All wells, including water, oil, and natural gas exploration and development wells, and other man-made subsurface structures and activities, including coal mines, within the facility area and within one mile [1.61 kilometers] of its outside boundary;</p>	<p>b. A map showing the following within the storage reservoir area and within one mile outside of its boundary:</p> <ul style="list-style-type: none"> i. All wells, including water, oil, and natural gas exploration and development wells ii. All other man-made subsurface structures and activities, including coal mines; 	<p>3.1.2 Supporting Maps</p>	<p>Figure 3-3. AOR map in relation to nearby legacy wells and groundwater wells. Shown are the storage facility area and AOR boundaries.</p> <p>Figure 3-3. AOR map in relation to nearby legacy wells and groundwater wells. Shown are the storage facility area and AOR boundaries.</p>
	<p>NDAC 43-05-01-05 §1c NDAC 43-05-01-05.1 §1a</p>	<p>NDAC 43-05-01-05 §1c c. The extent of the pore space that will be occupied by carbon dioxide as determined by utilizing all appropriate geologic and reservoir</p>	<p>c. A description of the method used for delineating the area of review, including:</p> <ul style="list-style-type: none"> i. The computational model to be used ii. The assumptions that will be made 	<p>Appendix A – DATA, PROCESSING, AND OUTCOMES OF CO₂ STORAGE GEOMODELING AND SIMULATIONS</p>	

		<p>engineering information and reservoir analysis, which must include various computational</p> <p>NDAC 43-05-01-05.1 §1a</p> <p>a. The method for delineating the area of review, including the model to be used, assumptions that will be made, and the site characterization data on which the model will be based;</p>	<p>iii. The site characterization data on which the model will be based;</p>		
<p>NDAC 43-05-01-05.1 §1b(1-4)</p>		<p>NDAC 43-05-01-05.1 §1b(1-4)</p> <p>b. A description of:</p> <p>(1) The reevaluation date, not to exceed five years, at which time the storage operator shall reevaluate the area of review;</p> <p>(2) The monitoring and operational conditions that would warrant a reevaluation of the area of review prior to the next scheduled reevaluation date;</p> <p>(3) How monitoring and operational data (e.g., injection rate and pressure) will be used to inform an area of review reevaluation; and</p> <p>(4) How corrective action will be conducted to meet the requirements of this section, including what corrective action will be performed prior to injection</p>	<p>d. A description of:</p> <p>(1) The reevaluation date, not to exceed five years, at which time the storage operator shall reevaluate the area of review;</p> <p>(2) Any monitoring and operational conditions that would warrant a reevaluation of the area of review prior to the next scheduled reevaluation date;</p> <p>(3) How monitoring and operational data (e.g., injection rate and pressure) will be used to inform an area of review reevaluation;</p> <p>(4) How corrective action will be conducted if necessary, including:</p> <p>a. What corrective action will be performed prior to injection</p> <p>b. How corrective action will be adjusted if there are changes in the area of review;</p>	<p>3.3 Reevaluation of AOR and Corrective Action Plan</p> <p>Minnkota will periodically reevaluate the AOR and corrective action plan in accordance with NDAC § 43-05-01-05.1, with the first reevaluation taking place not later than the fifth anniversary of NDIC’s issuance of a permit to operate under NDAC § 43-05-01-10 and every fifth anniversary thereafter (each being a Reevaluation Date). The AOR reevaluations will address the following:</p> <ul style="list-style-type: none"> • Any changes to the monitoring and operational data prior to the scheduled Reevaluation Date. • Monitoring and operational data (e.g., injection rate and pressure) will be used to update the geologic model and computational simulations. These updates will then be used to inform a reevaluation of the AOR and corrective action plan, including the computational model that was used to determine the AOR, and operational data to be utilized as the basis for that update will be identified. • The protocol to conduct corrective action, if necessary, will be conducted, including 1) what corrective action will be performed and 2) how corrective action will be adjusted if there are changes in the AOR. 	

		and what, if any, portions of the area of review will have corrective action addressed on a phased basis and how the phasing will be determined; how corrective action will be adjusted if there are changes in the area of review; and how site access will be guaranteed for future corrective action.			
NDAC 43-05-01-05 §1b(2)(b)	NDAC 43-05-01-05 §1b(2)(b) (b) All man-made surface structures that are intended for temporary or permanent human occupancy within the facility area and within one mile [1.61 kilometers] of its outside boundary;	e. A map showing the areal extent of all man-made surface structures that are intended for temporary or permanent human occupancy within the storage reservoir area, and within one mile outside of its boundary;	3.1.2 Supporting Maps		Figure 3-2. Final AOR map showing the storage facility area and AOR boundaries. The black circles represent occupied dwellings, and yellow boundaries represent buildings.
NDAC 43-05-01-05 §1b(2) ¶	NDAC 43-05-01-05 §1b(2) (2) A geologic and hydrogeologic evaluation of the facility area, including an evaluation of all existing information on all geologic strata overlying the storage reservoir, including the immediate caprock containment characteristics and all subsurface zones to be used for monitoring. The evaluation must include any available geophysical data and assessments of any regional tectonic activity, local seismicity and regional or local fault zones, and a comprehensive description of local and	f. A map and cross section identifying any productive existing or potential mineral zones occurring within the storage reservoir area and within one mile outside of its boundary;	2.6 Potential Mineral Zones There has been no historic hydrocarbon exploration in, or production from, formations above the Deadwood Formation in the storage facility area. The only hydrocarbon exploration well near the storage facility area, the Herbert Dresser 1-34 (NDIC File No. 4937), was drilled in 1970 to explore potential hydrocarbons in the Charles Formation. The well was dry and did not suggest the presence of hydrocarbons. There are no known producible accumulations of hydrocarbons in the storage facility area. Shallow gas resources can be found in many areas of North Dakota. North Dakota regulations define shallow gas resources as “gas produced from a zone that consists of strata or formation, including lignite or coal strata or seam, located above the depth of five thousand feet (1,524 meters) below the surface, or located more than five thousand feet (1,524 meters) below the surface but above the top of the Rierdon Formation (Jurassic), from which gas may be produced.” Lignite coal currently is mined in the area of the Center coal mine, operated by BNI Coal. The Center Mine currently mines the Hagel coal seam for use as fuel at Minnkota’s MRYS. The Hagel coal seam is the lowermost major lignite present in the area in the Sentinel Butte Formation. Thickness of the Hagel coal seam averages 7.8 ft in the area permitted to be mined but varies, with some areas exceeding 10 ft in thickness (Figure 2-65) (Ellis and others, 1999). Coal seams in the Bullion Creek Formation exist in the area below the Hagel seam, but currently the Hagel is the only economically minable seam with its thickness and overburden of 100 ft or less (Figure 2-66). The thickness of the Hagel and other coal seams in the Fort Union Group thicken and deepen to the west. The overlying Beulah–Zap coal seam pinches out farther to the west but is economically minable in the central part of Mercer County at North American Coal’s Coteau Mine. The Hagel seam pinches out to the east, and there are no other coal seams mined farther east than the Hagel.		Figure 2-65. Hagel net coal isopach map (modified from Ellis and others, 1999). Figure 2-66. Hagel overburden isopach map (modified from Ellis and others, 1999).

		<p>regional structural or stratigraphic features. The evaluation must describe the storage reservoir's mechanisms of geologic confinement, including rock properties, regional pressure gradients, structural features, and adsorption characteristics with regard to the ability of that confinement to prevent migration of carbon dioxide beyond the proposed storage reservoir. The evaluation must also identify any productive existing or potential mineral zones occurring within the facility area and any underground sources of drinking water in the facility area and within one mile [1.61 kilometers] of its outside boundary. The evaluation must include exhibits and plan view maps showing the following:</p>			
	<p>NDAC 43-05-01-05 §1b(3) NDAC 43-05-01-05.1 §2b</p>	<p>NDAC 43-05-01-05 §1b(3) (3) A review of the data of public record, conducted by a geologist or engineer, for all wells within the facility area, which penetrate the storage reservoir or primary or secondary seals overlying the reservoir, and all wells within the facility area and within one mile [1.61 kilometers], or any other distance as deemed necessary by the commission, of the facility area boundary.</p>	<p>g. A map identifying all wells within the area of review, which penetrate the storage formation or primary or secondary seals overlying the storage formation.</p>	<p>3.1.2 Supporting Maps</p>	<p>Figure 3-4. The AOR map in relation to nearby legacy wells. Shown are the storage facility area (purple boundary), Center city limits (yellow dotted boundary), and AOR (gray boundary). Orange circles represent nearby legacy wells near the project area, including within the AOR.</p>

		<p>The review must include the following:</p> <p>NDAC 43-05-01-05.1 §2b</p> <p>b. Using methods approved by the commission, identify all penetrations, including active and abandoned wells and underground mines, in the area of review that may penetrate the confining zone. Provide a description of each well's type, construction, date drilled, location, depth, record of plugging and completion, and any additional information the commission may require; and</p>			
	<p>NDAC 43-05-01-05 §1b(3)(a)</p> <p>NDAC 43-05-01-05 §1b(3)(b)</p> <p>NDAC 43-05-01-05 §1b(3)(c)</p>	<p>NDAC 43-05-01-05 §1b(3)(a)</p> <p>(a) A determination that all abandoned wells have been plugged and all operating wells have been constructed in a manner that prevents the carbon dioxide or associated fluids from escaping from the storage reservoir;</p> <p>NDAC 43-05-01-05 §1b(3)(b)</p> <p>(b) A description of each well's type, construction, date drilled, location, depth, record of plugging, and completion;</p>	<p>h. A review of these wells must include the following:</p> <p>(1) A determination that all abandoned wells have been plugged in a manner that prevents the carbon dioxide or associated fluids from escaping the storage formation;</p> <p>(2) A determination that all operating wells have been constructed in a manner that prevents the carbon dioxide or associated fluids from escaping the storage formation;</p> <p>(3) A description of each well:</p> <ol style="list-style-type: none"> Type Construction Date drilled Location Depth Record of plugging Record of completion <p>(4) Maps and stratigraphic cross sections of all underground sources of drinking water within the area of review indicating the following:</p>	<p>3.2 Corrective Action Evaluation</p> <p>Table 3-2. Wells in AOR Evaluated for Corrective Action</p> <p>Table 3-3. Little Boot 15-44 (NDIC File No. 8144) Well Evaluation</p> <p>Table 3-4. J-ROC1 (NDIC File No. 37672) Well Evaluation</p> <p>Table 3-5. J-LOC1 (NDIC File No. 37380) Well Evaluation</p> <p>Table 3-1. Investigated and Identified Surface and Subsurface Features (Figures 3-1 through 3-5)</p>	<p>Figure 3-6. Little Boot 15-44 (NDIC File No. 8144) well schematic showing the location and thickness of cement plugs.</p> <p>Figure 3-7. J-ROC1 (NDIC File No. 37672) well schematic showing the location and thickness of cement plugs.</p> <p>Figure 3-8. J-LOC1 (NDIC File No. 37380) as-constructed well schematic showing the final installation equipment used inside the wellbore to isolate perforations.</p>

<p>NDAC 43-05-01-05 §1b(3)(d)</p> <p>NDAC 43-05-01-05 §1b(3)(e)</p> <p>NDAC 43-05-01-05 §1b(3)(b)(f)</p>	<p>NDAC 43-05-01-05 §1b(3)(c)</p> <p>(c) Maps and stratigraphic cross sections indicating the general vertical and lateral limits of all underground sources of drinking water, water wells, and springs within the area of review; their positions relative to the injection zone; and the direction of water movement, where known;</p> <p>NDAC 43-05-01-05 §1b(3)(d)</p> <p>(d) Maps and cross sections of the area of review;</p> <p>NDAC 43-05-01-05 §1b(3)(e)</p> <p>(e) A map of the area of review showing the number or name and location of all injection wells, producing wells, abandoned wells, plugged wells or dry holes, deep stratigraphic boreholes, state-approved or United States environmental protection agency-approved subsurface cleanup sites, surface bodies of water, springs, mines (surface and subsurface),</p>	<p>a. Their positions relative to the injection zone</p> <p>b. The direction of water movement, where known</p> <p>c. General vertical and lateral limits</p> <p>d. Water wells</p> <p>e. Springs</p> <p>(5) Map and cross sections of the area of review;</p> <p>(6) A map of the area of review showing the following:</p> <p>a. Number or name and location of all injection wells</p> <p>b. Number or name and location of all producing wells</p> <p>c. Number or name and location of all abandoned wells</p> <p>d. Number of name and location of all plugged wells or dry holes</p> <p>e. Number or name and location of all deep stratigraphic boreholes</p> <p>f. Number or name and location of all state-approved or United States Environmental Protection Agency-approved subsurface cleanup sites</p> <p>g. Name and location of all surface bodies of water</p> <p>h. Name and location of all springs</p> <p>i. Name and location of all mines (surface and subsurface)</p> <p>j. Name and location of all quarries</p> <p>k. Name and location of all water wells</p> <p>l. Name and location of all other pertinent surface features</p> <p>m. Name and location of all structures intended for human occupancy</p> <p>n. Name and location of all state, county, or Indian country boundary lines</p> <p>o. Name and location of all roads</p>		
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		<p>quarries, water wells, other pertinent surface features, including structures intended for human occupancy, state, county, or Indian country boundary lines, and roads;</p> <p>NDAC-43-05-01-05 §1b(3)(b)(f) (f) A list of contacts, submitted to the commission, when the area of review extends across state jurisdiction boundary lines;</p>	<p>(7) A list of contacts, submitted to the Commission, when the area of review extends across state jurisdiction boundary lines.</p>		
<p>NDAC 43-05-01-05 §1b(3)(g)</p>		<p>NDAC 43-05-01-05 §1b(3)(g) (g) Baseline geochemical data on subsurface formations, including all underground sources of drinking water in the area of review; and</p>	<p>i. Baseline geochemical data on subsurface formations, including all underground sources of drinking water in the area of review.</p>	<p>Appendix C - FRESHWATER WELL FLUID-SAMPLING LABORATORY ANALYSIS</p> <p>3.4 Protection of USDWs</p> <p>3.4.1 Introduction of USDW Protection The primary confining zone and additional overlying confining zones geologically isolate the Fox Hills Formation, the deepest USDW in the AOR. The Icebox Formation is the primary confining zone with additional confining layers above, which geologically isolates all USDWs from the injection zone (Table 3-6).</p> <p>3.4.2 Geology of USDW Formations The hydrogeology of western North Dakota comprises several shallow freshwater-bearing formations of the Quaternary, Tertiary, and upper Cretaceous-aged sediments underlain by multiple saline aquifer systems of the Williston Basin (Figure 3-9). These saline and freshwater systems are separated by the Cretaceous Pierre Shale of the Williston Basin, a regionally extensive shale between 1000 and 1500 ft thick (Thamke and others, 2014).</p> <p>The freshwater aquifers comprise the Cretaceous Fox Hills and Hell Creek Formations; overlying Cannonball, Tongue River, and Sentinel Butte Formations of Tertiary Fort Union Group; and the Tertiary Golden Valley Formation (Figure 3-10). Above these are undifferentiated alluvial and glacial drift Quaternary aquifer layers, which are not necessarily present in all parts of the AOR (Croft, 1973).</p> <p>The lowest USDW in the AOR is the Fox Hills Formation, which together with the overlying Hell Creek Formation, is a confined aquifer system. The Hell Creek Formation is a poorly consolidated unit composed of interbedded sandstone, siltstone, and claystones with occasional carbonaceous beds, all fluvial origin. The underlying Fox Hills Formation is interpreted as interbedded nearshore marine deposits of sand, silt, and shale deposited as part of the final Western Interior Seaway retreat (Fischer, 2013). The Fox Hills Formation in the AOR is approximately 700 to 900 ft deep and 200 to 350 ft thick. The structure of the Fox Hills and Hell Creek Formations follows that of the Williston Basin, dipping gently toward the center of the basin to the northwest of the AOR (Figure 3-11).</p> <p>The Pierre Shale is a thick, regionally extensive shale unit, which forms the lower boundary of the Fox Hills–Hell Creek system, also isolating all overlying freshwater aquifers from the deeper saline aquifer systems. The Pierre shale is a dark gray to black marine shale and is typically 1000 ft thick in the AOR (Thamke and others, 2014).</p> <p>3.4.3 Hydrology of USDW Formations The aquifers of the Fox Hills and Hell Creek Formations are hydraulically connected and function as a single confined aquifer system (Fischer, 2013). The Bacon Creek Member of the Hell Creek Formation forms a regional aquitard for the Fox Hills–Hell Creek aquifer system, which isolates it from the overlying aquifer layers. Recharge for the Fox Hills–Hell Creek aquifer system occurs in southwestern North Dakota along the Cedar Creek Anticline and discharges into overlying</p>	<p>Table 3-6. Description of Zones of Confinement above the Immediate Upper Confining Zone (data based on the J-ROC1 well)</p> <p>Figure 3-9. Major aquifer systems of the Williston Basin.</p> <p>Figure 3-10. Upper stratigraphy of Oliver County showing the stratigraphic relationship of Cretaceous and Tertiary groundwater-bearing formations (modified from Croft, 1973).</p> <p>Figure 3-11. Depth to surface of the Fox Hills Formation in western North Dakota (Fischer, 2013).</p> <p>Figure 3-12. Potentiometric surface of the Fox Hills–Hell Creek aquifer system shown in feet of hydraulic head above sea level. Flow is to the northeast through the area of investigation in central Oliver County (modified from Fischer, 2013).</p> <p>Figure 3-13. Map of water wells in the AOR in relation to the McCall-1 planned injection well, the NRDT-1 proposed monitoring well, storage facility area, AOR, and legacy oil and gas wells.</p> <p>Figure 3-14. West–east cross section of the major regional aquifer layers in Mercer and Oliver Counties and their associated geologic relationships (modified from Croft, 1973). The black dots on the inset map represent the</p>

				<p>strata under central and eastern North Dakota (Fischer, 2013). Flow through the AOR is to the east (Figure 3-12). Water sampled from the Fox Hills Formation is a sodium bicarbonate type with a total dissolved solids (TDS) content of approximately 1,500–1,600 ppm. Previous analysis of Fox Hills Formation water has also noted high levels of fluoride, more than 5 mg/L (Trapp and Croft, 1975). As such, the Fox Hills–Hell Creek system is typically not used as a primary source of drinking water. However, it is occasionally produced for irrigation and/or livestock watering.</p> <p>Based on the North Dakota State Water Commission (SWC) database, eight water wells penetrate the Fox Hills Formation in the AOR (Figure 3-13). One observation well monitored by the U.S. Geological Survey is located 1 mi east of Center, North Dakota, nearly 5 mi northwest of the McCall-1 injection site. One well is 5 mi northeast of the injection site along North Dakota Highway 25 and is used for stock. The status of the remaining six wells is under investigation. One well is about 9 mi southeast of the injection site near a legacy oil exploratory well and is permitted as an industrial well. Five wells lie to the southwest. Three wells are about 3, 11, and 12 mi from the injection site and are permitted as domestic water supply. The last two wells are located on adjacent sections 11 mi from the injection site; one is permitted for stock, and the other’s purpose is unknown.</p> <p>Multiple other freshwater-bearing units, primarily of Tertiary age, overlie the Fox Hills–Hell Creek aquifer system in the AOR (Figure 3-14). These formations are often used for domestic and agricultural purposes. The Cannonball and Tongue River Formations comprise the major aquifer units of the Fort Union Group, which overlies the Hell Creek Formation. The Cannonball Formation consists of interbedded sandstone, siltstone, claystone, and thin lignite beds of marine origin. The Tongue River Formation is predominantly sandstone interbedded with siltstone, claystone, lignite, and occasional carbonaceous shales. The basal sandstone member of the Tongue River is persistent and a reliable source of groundwater in the region. The thickness of this basal sand ranges from approximately 200 to 500 ft and directly underlies surficial glacial deposits in the area of investigation. Tongue River groundwaters are generally a sodium bicarbonate type with a TDS of approximately 1,000 ppm (Croft, 1973).</p> <p>The Sentinel Butte Formation, a silty fine-to-medium-grained sandstone with claystone and lignite interbeds, overlies the Tongue River Formation in the extreme western portion of the AOR. The Sentinel Butte Formation is predominantly sandstone with lignite interbeds. While the Sentinel Butte Formation is another important source of groundwater in the region, primarily to the west of the AOR, the Sentinel Butte is not a source of groundwater within the AOR. TDS in the Sentinel Butte Formation range from approximately 400–1,000 ppm (Croft, 1973).</p> <p>3.4.4 Protection for USDWs The Fox Hills–Hell Creek aquifer system is the lowest USDW in the AOR. The injection zone (Deadwood Formation) and lowest USDW (Fox Hills–Hell Creek aquifer system) are isolated geologically and hydrologically by multiple impermeable rock layers consisting of shale and carbonate formations of Ordovician, Silurian, Devonian, Carboniferous, Permian, Jurassic, and Cretaceous ages (Figure 3-9). The primary seal of the injection zone is the Ordovician-aged Icebox Formation with shales of the Ordovician-aged Roughlock and Stoughton, Mississippian–Devonian-aged Bakken, Permian-aged Opeche, Jurassic-aged Piper (Picard), Rierdon, and Swift Formations, all of which overlie the Icebox Formation. Above the Swift is the confined saltwater aquifer system of the Inyan Kara Formation, which extends across much of the Williston Basin. The Inyan Kara Formation will be monitored for temperature and pressure changes via fiber optic lines installed in the injection well, McCall-1 and the NRDT-1 monitoring well. Above the Inyan Kara Formation are the Cretaceous-aged shale formations, which are named the Skull Creek, Mowry, Belle Fourche, Greenhorn, Carlisle, Niobrara, and Pierre. The Pierre Formation is the thickest shale formation in the AOR and the primary geologic barrier between the USDWs and the injection zone. The geologic strata overlying the injection zone consist of multiple impermeable rock layers that are free of transmissive faults or fractures and provide adequate isolation of the USDWs from CO₂ injection activities in the AOR.</p>	<p>locations of the water wells illustrated on the cross section.</p>
<p>Required Plans</p>	<p>NDAC 43-05-01-05 §1k</p>	<p>NDAC 43-05-01-05 §1k k. The storage operator shall comply with the financial responsibility requirements pursuant to section 43-05-01-9.1;</p>	<p>a. Financial Assurance Demonstration</p>	<p>4.3 Financial Assurance Demonstration Plan; See Appendix G</p> <p>4.3.1 Approach to Meeting Financial Responsibility Requirements</p> <p><i>4.3.1.1 Corrective Action</i></p> <p><i>4.3.1.2 Injection Well-Plugging Program</i></p> <p><i>4.3.1.3 Postinjection Site Care and Facility Closure</i></p>	

			<p>4.3.1.4 <i>Emergency and Remedial Response</i></p> <p>4.3.1.5 <i>Endangerment of Drinking Water Sources</i></p> <p>4.3.2 <i>Approach to Financial Risk</i></p> <p>4.3.3 <i>Selected Elements of Applicant’s Analysis of Inherent Risks</i></p> <p>4.3.4 <i>Costs Estimates</i></p> <p>Table 4-14. Potential Future Costs Covered by Financial Assurance in \$K</p> <table border="1"> <thead> <tr> <th>Activity</th> <th>Total Cost</th> <th>Covered by Special-Purpose Trust</th> <th>Covered by Commercial Insurance</th> <th>Details in Supporting Table</th> </tr> </thead> <tbody> <tr> <td>Corrective Action on Wells in AOR</td> <td>\$0</td> <td>\$0</td> <td>\$0</td> <td>NA</td> </tr> <tr> <td>Plugging Injection Wells</td> <td>\$2,025</td> <td>\$2,025</td> <td>\$0</td> <td>Table 4-14-1</td> </tr> <tr> <td>Postinjection Site Care</td> <td>\$10,285</td> <td>\$10,285</td> <td>\$0</td> <td>Table 4-14-2</td> </tr> <tr> <td>Site Closure</td> <td>\$1,554</td> <td>\$1,554</td> <td>\$0</td> <td>Table 4-14-3</td> </tr> <tr> <td>Emergency and Remedial Response</td> <td>\$16,560</td> <td>\$5,960</td> <td>\$10,600</td> <td>Table 4-14-4</td> </tr> <tr> <td>Endangerment of USDWs</td> <td>\$2,240</td> <td>\$0</td> <td>\$2,240</td> <td>Table 4-14-5</td> </tr> <tr> <td>Total</td> <td>\$32,664</td> <td>\$19,824</td> <td>\$12,840</td> <td></td> </tr> </tbody> </table>	Activity	Total Cost	Covered by Special-Purpose Trust	Covered by Commercial Insurance	Details in Supporting Table	Corrective Action on Wells in AOR	\$0	\$0	\$0	NA	Plugging Injection Wells	\$2,025	\$2,025	\$0	Table 4-14-1	Postinjection Site Care	\$10,285	\$10,285	\$0	Table 4-14-2	Site Closure	\$1,554	\$1,554	\$0	Table 4-14-3	Emergency and Remedial Response	\$16,560	\$5,960	\$10,600	Table 4-14-4	Endangerment of USDWs	\$2,240	\$0	\$2,240	Table 4-14-5	Total	\$32,664	\$19,824	\$12,840		
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NDAC 43-05-01-05 §1d	NDAC 43-05-01-05 §1d d. An emergency and remedial response plan pursuant to section 43-05-01-13;	b. An emergency and remedial response plan;	<p>4.2 Emergency and Remedial Response Plan; See Appendix E</p> <p>4.2.1 <i>Description of Project Area</i></p> <p>4.2.2 <i>Risk Identification and Severity</i></p> <p>4.2.3 <i>Response Protocols</i></p> <p>4.2.4 <i>Emergency Contacts</i></p> <p>4.2.5 <i>Emergency Communications Plan</i></p> <p>4.2.6 <i>ERRP Review</i></p>																																									
NDAC 43-05-01-05 §1e	NDAC 43-05-01-05 §1e e. A detailed worker safety plan that addresses carbon dioxide safety training and safe working procedures at the storage facility pursuant to section 43-05-01-13;	c. A detailed worker safety plan that addresses the following: i. Carbon dioxide safety training ii. Safe working procedures at the storage facility;	<p>4.4 Worker Safety Plan (NDAC 43-05-01-05 §1e; NDAC 43-05-01-13)</p> <p>4.4.1 <i>Definitions</i></p> <p>4.4.2 <i>Stop Work Authority</i></p> <p>4.4.3 <i>Incident Notification and Response</i></p> <p>4.4.4 <i>Incident Report and Investigation</i></p>																																									

				<p>4.4.5 Training</p> <p>4.4.6 Contractor Qualification and Bridging Documents</p> <p>4.4.7 General Health, Safety, and Welfare</p> <p>4.4.8 Personal Protective Equipment</p> <p>4.4.9 Hand Safety</p> <p>4.4.10 Permitted Work Activities</p> <p>4.4.11 Chemical, Hazardous, or Flammable Materials</p> <p>4.4.12 Compressed Gas and Air Cylinders</p> <p>4.4.13 Overhead/Outside Guarded Area</p> <p>4.4.14 Work Site Conduct</p>	
NDAC 43-05-01-05 §1f	<p>NDAC 43-05-01-05 §1f f. A corrosion monitoring and prevention plan for all wells and surface facilities pursuant to section 43-05-01-15;</p>	d.	<p>A corrosion monitoring and prevention plan for all wells and surface facilities;</p>	<p>4.1.2 Corrosion Monitoring and Prevention Plan</p> <p>4.1.2.1 Corrosion Threat Assessment</p> <p>4.1.2.2 Identification of Critical Components and Operating Conditions; See Appendix F</p> <p>4.1.2.3 Damage Mechanism</p> <p>4.1.2.4 Corrosion Control Program (CCP)</p> <p>4.1.2.5 Annual Review</p> <p>4.1.2.6 Data Management</p>	
NDAC 43-05-01-05 §1g	<p>NDAC 43-05-01-05 §1g g. A leak detection and monitoring plan for all wells and surface facilities pursuant to section 43-05-01-14. The plan must:</p> <p>(1) Identify the potential for release to the atmosphere;</p> <p>(2) Identify potential degradation of ground water resources with particular emphasis on underground sources of</p>	e.	<p>A surface leak detection and monitoring plan for all wells and surface facilities pursuant to North Dakota Administrative Code (NDAC) Section 43-05-01-14;</p>	<p>4.1.3 Surface Leak Detection and Monitoring Plan</p>	

		<p>drinking water; and</p> <p>(3) Identify potential migration of carbon dioxide into any mineral zone in the facility area.</p>			
	<p>NDAC 43-05-01-05 §1h</p>	<p>NDAC 43-05-01-05 §1h h. A leak detection and monitoring plan to monitor any movement of the carbon dioxide outside of the storage reservoir. This may include the collection of baseline information of carbon dioxide background concentrations in ground water, surface soils, and chemical composition of in situ waters within the facility area and the storage reservoir and within one mile [1.61 kilometers] of the facility area's outside boundary. Provisions in the plan will be dictated by the site characteristics as documented by materials submitted in support of the permit application but must:</p> <p>(1) Identify the potential for release to the atmosphere;</p> <p>(2) Identify potential degradation of ground water resources with particular emphasis on underground sources of drinking water; and</p>	<p>f. A subsurface leak detection and monitoring plan to monitor for any movement of the carbon dioxide outside of the storage reservoir. This may include the collection of baseline information of carbon dioxide background concentrations in ground water, surface soils, and chemical composition of in situ waters within the facility area and the storage reservoir and within one mile of the facility area's outside boundary;</p>	<p>4.1.4 Subsurface Leak Detection and Monitoring Program</p> <p>4.1.5 Near-Surface Groundwater and Soil Gas Sampling and Monitoring</p> <p>4.1.6 Baseline Sampling Program</p> <p>4.1.6.1 Groundwater Baseline Sampling</p> <p>4.1.6.2 Soil Gas Baseline Sampling</p>	

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NDAC 43-05-01-05 §11	NDAC 43-05-01-05 §11 l. A testing and monitoring plan pursuant to section 43-05-01-11.4;	g. A testing and monitoring plan pursuant to NDAC Section 43-05-01-11.4;	4.1 Testing and Monitoring Plan 4.1.1 Analysis of Injected CO₂ and Injection Well Testing 4.1.1.1 CO ₂ Analysis 4.1.1.2 Injection Well Integrity Tests 4.1.5 Near-Surface Groundwater and Soil Gas Sampling and Monitoring 4.1.6 Baseline Sampling Program; See Appendix C 4.1.6.1 Groundwater Baseline Sampling 4.1.6.2 Soil Gas Baseline Sampling 4.1.7 Near-Surface Monitoring Plan 4.1.8 Deep Subsurface Monitoring of Free-Phase CO₂ Plume and Pressure Front 4.1.8.1 Direct Monitoring Methods 4.1.8.2 Indirect Monitoring Methods 4.1.9 Quality Control and Surveillance Plan; See Appendix D
NDAC 43-05-01-05 §1i	NDAC 43-05-01-05 §1i i. The proposed well casing and cementing program detailing compliance with section 43-05-01-09;	h. The proposed well casing and cementing program;	4.5 Well Casing and Cementing Program 4.5.1 McCall-1 – Proposed Deadwood CO₂ Injection Well Casing and Cementing Programs 4.5.2 NRDT-1 – Proposed Deadwood CO₂-Monitoring Well Casing and Cementing Programs
NDAC 43-05-01-05 §1m	NDAC 43-05-01-05 §1m m. A plugging plan that meets requirements pursuant to section 43-05-01-11.5;	i. A plugging plan;	4.6 Well P&A Program 4.6.1 McCall-1 Deadwood CO₂ Injection Well Plugging and Abandonment 4.6.1.1 McCall-1 Injection Well-Plugging Schematic 4.6.1.2 Tentative Plugging Procedures 4.6.2 NRDT-1 Deadwood Monitor Well Plugging and Abandonment 4.6.2.1 NRDT-1 Monitor Well-Plugging Schematic 4.6.2.2 Tentative Plugging Procedures

	NDAC 43-05-01-05 §1n	NDAC 43-05-01-05 §1n n. A postinjection site care and facility closure plan pursuant to section 43-05-01-19; and	j. A postinjection site care and facility closure plan.	<p>4.7 Postinjection Site and Facility Closure Plan</p> <p>4.7.1 Predicted Postinjection Subsurface Condition</p> <p>4.7.1.1 Pre- and Postinjection Pressure Differential</p> <p>4.7.1.2 Predicted Extent of CO₂ Plume</p> <p>4.7.1.3 Postinjection Monitoring Plan</p> <p>4.7.2 Groundwater and Soil Gas Monitoring</p> <p>4.7.3 Monitoring of CO₂ Plume and Pressure Front</p> <p>4.7.3.1 Schedule for Submitting Postinjection Monitoring Results</p> <p>4.7.3.2 Site Closure Plan</p> <p>4.7.3.3 Submission of Site Closure Report, Survey, and Deed</p>																												
Storage Facility Operations	NDAC 43-05-01-05 §1b(4)	NDAC 43-05-01-05 §1b(4) (4) The proposed calculated average and maximum daily injection rates, daily volume, and the total anticipated volume of the carbon dioxide stream using a method acceptable to and filed with the commission;	The following items are required as part of the storage facility permit application: a. The proposed average and maximum daily injection rates;	<p>5.0 INJECTION WELL AND STORAGE OPERATIONS</p> <p>This section of the storage facility permit (SFP) application presents the engineering criteria for completing and operating the injection well in a manner that protects underground sources of drinking water (USDWs). The information that is presented meets the permit requirements for injection well and storage operations as presented in North Dakota Administrative Code (NDAC) § 43-05-01-05 (SFP, Table 5-1) and NDAC § 43-05-01-11.3</p> <p>Table 5-1. McCall-1 Proposed Deadwood Injection Well Operating Parameters</p> <table border="1"> <thead> <tr> <th>Predicted Metric</th> <th>McCall-1</th> <th>Description/Comments</th> </tr> </thead> <tbody> <tr> <td colspan="3" style="text-align: center;">Injection Volume</td> </tr> <tr> <td>Total Injected Volume, MMt</td> <td>23.4</td> <td>Based on 20 years of injection.</td> </tr> <tr> <td colspan="3" style="text-align: center;">Injection Rate</td> </tr> <tr> <td>Predicted Average Injection Rate, tonnes per day</td> <td>3,250</td> <td>Based on total injected volumes for 20 years and using 365 operating days a year.</td> </tr> <tr> <td>Maximum Predicted Daily Injection Rate, tonnes per day</td> <td>3,865</td> <td>Based on 20 years of injection.</td> </tr> <tr> <td colspan="3" style="text-align: center;">Pressure</td> </tr> <tr> <td>Formation Fracture Pressure at Top Perforation, psi</td> <td>6,866</td> <td>The injectivity test results fracture closure gradient of 0.75 psi/ft.</td> </tr> <tr> <td>Average Predicted Operating Surface Injection Pressure, psi</td> <td>2,794</td> <td>Based on 20 years of injection.</td> </tr> </tbody> </table>	Predicted Metric	McCall-1	Description/Comments	Injection Volume			Total Injected Volume, MMt	23.4	Based on 20 years of injection.	Injection Rate			Predicted Average Injection Rate, tonnes per day	3,250	Based on total injected volumes for 20 years and using 365 operating days a year.	Maximum Predicted Daily Injection Rate, tonnes per day	3,865	Based on 20 years of injection.	Pressure			Formation Fracture Pressure at Top Perforation, psi	6,866	The injectivity test results fracture closure gradient of 0.75 psi/ft.	Average Predicted Operating Surface Injection Pressure, psi	2,794	Based on 20 years of injection.	
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NDAC 43-05-01-05 §1b(5)	NDAC 43-05-01-05 §1b(5) (5) The proposed average and maximum bottomhole injection pressure to be utilized at the reservoir. The maximum allowed injection pressure, measured in pounds per square inch gauge, shall be approved by the commission and specified in the permit. In approving a maximum injection pressure limit, the commission shall	d. The proposed average and maximum bottomhole injection pressure to be utilized;																														

		<p>consider the results of well tests and other studies that assess the risks of tensile failure and shear failure. The commission shall approve limits that, with a reasonable degree of certainty, will avoid initiating a new fracture or propagating an existing fracture in the confining zone or cause the movement of injection or formation fluids into an underground source of drinking water;</p>	<p>e. The proposed average and maximum surface injection pressures to be utilized;</p>	<table border="1"> <tr> <td>Maximum Wellhead Injection Pressure, psi</td> <td>3,445</td> <td>Maximum wellhead injection pressure is limited based on surface facility constraints and 90% of formation fracture pressure.</td> </tr> <tr> <td>Average Predicted Operating Bottomhole Pressure (BHP), psi</td> <td>6,139</td> <td>Based on 20 years of injection.</td> </tr> <tr> <td>Maximum BHP psi</td> <td>6,179</td> <td>Calculated maximum BHP using 90% of the closure pressure from the injectivity test at the top of the perforation. Maximum BHP is limited based on surface facility constraints.</td> </tr> </table>	Maximum Wellhead Injection Pressure, psi	3,445	Maximum wellhead injection pressure is limited based on surface facility constraints and 90% of formation fracture pressure.	Average Predicted Operating Bottomhole Pressure (BHP), psi	6,139	Based on 20 years of injection.	Maximum BHP psi	6,179	Calculated maximum BHP using 90% of the closure pressure from the injectivity test at the top of the perforation. Maximum BHP is limited based on surface facility constraints.																			
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<p>NDAC 43-05-01-05 §1b(6)</p>	<p>NDAC 43-05-01-05 §1b(6) (6) The proposed preoperational formation testing program to obtain an analysis of the chemical and physical characteristics of the injection zone and confining zone pursuant to section 43-05-01-11.2;</p>		<p>f. The proposed preoperational formation testing program to obtain an analysis of the chemical and physical characteristics of the injection zone;</p> <p>g. The proposed preoperational formation testing program to obtain an analysis of the chemical and physical characteristics of the confining zone;</p>	<p>Table 4-8a. Logging Program for Deadwood Injector Well (McCall-1 [proposed])</p> <table border="1"> <thead> <tr> <th>Log</th> <th>Justification</th> <th>NDAC Section</th> </tr> </thead> <tbody> <tr> <td>Cased Hole Logs: ultrasonic CBL (cement bond log), VDL (variable-density log), GR (gamma ray), Temperature Log</td> <td>Identify cement bond quality radially. Detect cement channels. Evaluate the cement top and zonal isolation.</td> <td>43-05-01-11.2(1c[2])</td> </tr> <tr> <td>Triple Combo (resistivity, density,* neutron,* GR, caliper) and SP (spontaneous potential)</td> <td>Quantify variability in reservoir properties such as resistivity and lithology. Identify the wellbore volume to calculate the required cement volume. Provide input for enhanced geomodeling and predictive simulation of CO₂ injection into the interest zones to improve test design and interpretations.</td> <td>43-05-01-11.2(1c[1])</td> </tr> <tr> <td>*No density or neutron in surface section.</td> <td></td> <td></td> </tr> <tr> <td>Temperature Log</td> <td>Monitor wellbore temperature in the openhole. A temperature log will also be run in cased hole for temperature to DTS calibration.</td> <td>43-05-01-11.2(1c[2])</td> </tr> <tr> <td>Spectral GR</td> <td>Identify clays and lithology that could affect injectivity.</td> <td>43-05-01-11.2(2)</td> </tr> <tr> <td>Dipole Sonic and 4-Arm Caliper</td> <td>Identify mechanical properties including stress anisotropy. Provide compression and shear waves for seismic tie-in and quantitative analysis of the seismic data.</td> <td>43-05-01-11.2(1c[1])</td> </tr> <tr> <td>Fracture Finder Log</td> <td>Quantify fractures in the Broom Creek and Black Island/Deadwood Formations and confining layers to ensure safe, long-term storage of CO₂.</td> <td>43-05-01-11.2(1c[1])</td> </tr> <tr> <td>MDT (modular dynamics testing) Fluid Sampling</td> <td>Collect fluid samples from the Broom Creek and Deadwood Formations for geochemical testing and TDS quantification.</td> <td>43-05-01-11.2(2)</td> </tr> </tbody> </table>	Log	Justification	NDAC Section	Cased Hole Logs: ultrasonic CBL (cement bond log), VDL (variable-density log), GR (gamma ray), Temperature Log	Identify cement bond quality radially. Detect cement channels. Evaluate the cement top and zonal isolation.	43-05-01-11.2(1c[2])	Triple Combo (resistivity, density,* neutron,* GR, caliper) and SP (spontaneous potential)	Quantify variability in reservoir properties such as resistivity and lithology. Identify the wellbore volume to calculate the required cement volume. Provide input for enhanced geomodeling and predictive simulation of CO ₂ injection into the interest zones to improve test design and interpretations.	43-05-01-11.2(1c[1])	*No density or neutron in surface section.			Temperature Log	Monitor wellbore temperature in the openhole. A temperature log will also be run in cased hole for temperature to DTS calibration.	43-05-01-11.2(1c[2])	Spectral GR	Identify clays and lithology that could affect injectivity.	43-05-01-11.2(2)	Dipole Sonic and 4-Arm Caliper	Identify mechanical properties including stress anisotropy. Provide compression and shear waves for seismic tie-in and quantitative analysis of the seismic data.	43-05-01-11.2(1c[1])	Fracture Finder Log	Quantify fractures in the Broom Creek and Black Island/Deadwood Formations and confining layers to ensure safe, long-term storage of CO ₂ .	43-05-01-11.2(1c[1])	MDT (modular dynamics testing) Fluid Sampling	Collect fluid samples from the Broom Creek and Deadwood Formations for geochemical testing and TDS quantification.	43-05-01-11.2(2)	
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NDAC 43-05-01-05 §1b(7)	<p>NDAC 43-05-01-05 §1b(7)</p> <p>(7) The proposed stimulation program, a description of stimulation fluids to be used, and a determination that stimulation will not interfere with containment; and</p>	h. The proposed stimulation program: <ol style="list-style-type: none"> 1. A description of the stimulation fluids to be used 2. A determination of the probability that stimulation will interfere with containment; 	<p>5.1 Proposed Completion Procedure to Conduct Injection Operations in the Deadwood Injection Well</p> <p>Minnkota Power Cooperative (Minnkota) plans to construct one carbon dioxide (CO₂) injection well (McCall-1) designed by Oxy Low Carbon Ventures in compliance with Class VI UIC (underground injection control) injection well construction requirements, as discussed in previous sections and drilled according to the proposed program in the permit to drill. The following proposed completion procedure outlines the steps necessary to complete a Deadwood well for injection purposes (Figure 5-1, Table 5-2).</p>	<p>Table 5-2. McCall-1_Deadwood Injection Well Proposed Casing Properties</p> <p>Table 5-3. McCall-1_Deadwood CO₂ Injection Well Proposed Tubing Design</p>																									

NDAC 43-05-01-05 §1b(8)

NDAC 43-05-01-05 §1b(8)
 (8) The proposed procedure to outline steps necessary to conduct injection operations.

i. Steps to begin injection operations

5.1 Proposed Completion Procedure to Conduct Injection Operations in the Deadwood Injection Well
 Minnkota Power Cooperative (Minnkota) plans to construct one carbon dioxide (CO₂) injection well (McCall-1) designed by Oxy Low Carbon Ventures in compliance with Class VI UIC (underground injection control) injection well construction requirements, as discussed in previous sections and drilled according to the proposed program in the permit to drill. The following proposed completion procedure outlines the steps necessary to complete a Deadwood well for injection purposes (Figure 5-1, Table 5-2).

Table 5-1. McCall-1 Proposed Deadwood Injection Well Operating Parameters

Predicted Metric	McCall-1	Description/Comments
Injection Volume		
Total Injected Volume, MMt	23.4	Based on 20 years of injection.
Injection Rate		
Predicted Average Injection Rate, tonnes per day	3,250	Based on total injected volumes for 20 years and using 365 operating days a year.
Maximum Predicted Daily Injection Rate, tonnes per day	3,865	Based on 20 years of injection.
Pressure		
Formation Fracture Pressure at Top Perforation, psi	6,866	The injectivity test results fracture closure gradient of 0.75 psi/ft.
Average Predicted Operating Surface Injection Pressure, psi	2,794	Based on 20 years of injection.
Maximum Wellhead Injection Pressure, psi	3,445	Maximum wellhead injection pressure is limited based on surface facility constraints and 90% of formation fracture pressure.
Average Predicted Operating Bottomhole Pressure (BHP), psi	6,139	Based on 20 years of injection.
Maximum BHP psi	6,179	Calculated maximum BHP using 90% of the closure pressure from the injectivity test at the top of the perforation. Maximum BHP is limited based on surface facility constraints.
Predicted Metric	McCall-1	Description/Comments
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Total Injected Volume, MMt	23.4	Based on 20 years of injection.
Injection Rate		
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				5.2 WELL – Proposed Procedure for Monitoring Well Operations		

			<ol style="list-style-type: none"> 1. Pick up work string with 8½" bit to clean cement on top of the liner. Clean cement, circulate, and pull out of the hole. 2. Pick up work string with 6¾" and rotating scrapper to clean cement inside of the liner. Clean cement to the top of the landing collar. 3. Circulate with brine 10 ppg. 4. Test casing for 30 minutes with 1,500 psi. If the pressure decreases more than 10% in 30 minutes, bleed pressure, check surface lines and surface connections, and repeat test. If the failure persists, the Operator may require assessing the root cause and correcting it. 5. Pull bottomhole assembly (BHA) out of the hole. 6. Perform safety meeting to discuss logging and perforating operations. 7. Rig up logging truck. 8. Run cased hole logs by program. Note: run CBL/VDL (cement bond log/carriable-density log) and USIT (ultrasonic imaging tool) without pressure as a first pass and run it with 1,000 psi pressure as a second pass, if needed. <p>Note: In case the cementing logs show poor bonding in the cementing job, the results will be communicated to the North Dakota Industrial Commission (NDIC), and an action plan will be prepared.</p> <ol style="list-style-type: none"> 9. Run perforating guns to the injection target. 10. Perforate the Black Island and Deadwood Formation, minimum 4 spf (shots per foot). Depth will be defined with the final log. Gas gun technology or high-performance guns should be evaluated to provide deeper penetration into the formation. 11. Pull guns out of the hole. 12. Rig down logging truck. 13. Pick up straddle packer and run in the hole with working string. 14. Circulate with brine 10 ppg. 15. Set packer in the Deadwood Formation to isolate the perforations. 16. Rig up acid trucks and equipment. 17. Perform cleaning of the perforations with acid. Adjust acid formulation and volumes with water samples and compatibility test. 18. Rig down acid trucks and equipment. 19. Perform an injectivity test/step rate test. 20. Unset packer and circulate hole. 21. Set packer in the Black Island Formation to isolate the perforations. 22. Rig up acid trucks and equipment. 23. Perform cleaning of the perforations with acid. Adjust acid formulation and volumes with water samples and compatibility test. 24. Rig down acid trucks and equipment. 25. Perform an injectivity test/step rate test. 26. Unset packer and circulate hole. 27. Pull packer and work string out of the hole. 28. Rig up spooler and prepare rig floor to run upper completion. 29. Run completion assembly per program. 30. Circulate well with inhibited packer fluid. 31. Set packer 50 ft above the top perforations. 32. Install tubing sections, cable connector, and tubing hanger. 33. Rig up logging truck. 34. Run cased hole logs through tubing by program. 35. Rig down logging truck. 36. Nipple down BOP (blowout preventer). 37. Install injection tree. <p>Note: Figure 5-2 illustrates the proposed wellhead schematic</p> <ol style="list-style-type: none"> 38. Rig down equipment. <p>Note: DTS/DAS (distributed temperature sensing/distributed acoustic sensing) fiber optic will be run and attached to the exterior of the intermediate casing. Special clamps, bands, and centralizers will be installed to protect the fiber and provide a marker for wireline operations.</p>	
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				<p>Note: Liner hanger should include top packer seal.</p> <p>The McCall-1_Deadwood CO₂ Injection Well Proposed Tubing Design is detailed in the following section (Table 5-3).</p> <ol style="list-style-type: none">1. Packer depth will be adjusted with the final perforation depth interval.2. Packer will be set 50 ft above top perforations.3. Packer is required to be nickel-plated with HNBR elastomers.4. Inconel cable along with quartz pressure and temperature gauges will be run in upper completion.	
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North Dakota Industrial Commission Notice of Hearing



Kadrmas, Bethany R.

To

- smikula@minnkota.com; LBender@fredlaw.com; Anderson, Carl J.; Murphy, Ed C.; Paczkowski, John A.; Best, Steve L;
- boomgaard.craig@epa.gov; ndfieldoffice@fws.gov; achp@achp.gov; Williams, Jeb R.; Peterson, Bill; lwickstr@blm.gov; Kbear@mhanation.com;
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- ceverett@mhanation.com

Reply Reply All Forward

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- PDF Notice of Hearing (Broom Creek Formation).pdf 309 KB
- PDF Notice of Hearing (Deadwood Formation).pdf 309 KB



The attached hearing notices are sent pursuant to North Dakota Administrative Code Section 43-05-01-08(5).
 The fact sheets, storage facility permit applications, and draft permits are available for download at: <https://www.dmr.nd.gov/oilgas/GeoStorageofCO2.asp>

Please contact our office if you have any questions.

Bethany Kadrmas

Legal Assistant, Oil and Gas Division

701.328.8020 • brkadrmas@nd.gov • www.dmr.nd.gov



600 E Boulevard Ave, Dept. 405 • Bismarck, ND 58505

North Dakota Industrial Commission Notice of Hearing



Kadrmas, Bethany R.

To

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- littlejudyd@gmail.com; Sales@dacotahwest.com; Amy Sisk; Nodaky12@gmail.com; dave_french@mckinsey.com; clweaver@eprod.com; laura.bird@whiting.com;
- josh.armstrong@ameritas.com; jwilcoxen@cliftygroup.com; sara.phiaxay@steelreef.ca; jennifer_lee@tcenergy.com; Spangelo, Kayla

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- PDF Notice of Hearing (Broom Creek Formation).pdf 309 KB
- PDF Notice of Hearing (Deadwood Formation).pdf 309 KB



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Bethany Kadrmas

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600 E Boulevard Ave, Dept. 405 • Bismarck, ND 58505

North Dakota Industrial Commission Notice of Hearing



Kadrmas, Bethany R.

To

Bcc centerca@westriv.com; -Info-Public Service Commission; jjrw2492@aol.com; natalie.pierce@mortonnd.org; Zueger, Cyndi L.; Smith, Jodi; Taylor, Paul; Henke, Ron J.; Hintz, Judith M.; Rhone, Dawn R.; Brost, Shana L.

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Wed 9/29/2021 2:31 PM



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Bethany Kadrmas

Legal Assistant, Oil and Gas Division

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Bismarck, ND US

TO

Washington, DC US

Travel History

TIME ZONE

Local Scan Time



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1:35 PM	Washington, DC	Delivered
2:53 AM	BELTSVILLE, MD	On FedEx vehicle for delivery
1:47 AM	BELTSVILLE, MD	At local FedEx facility

Wednesday, October 6, 2021

7:36 PM	HAGERSTOWN, MD	Departed FedEx location
12:11 PM	HAGERSTOWN, MD	Arrived at FedEx location
9:51 AM	BRUSH CREEK TWP, PA	In transit

Tuesday, October 5, 2021

8:48 PM	SOUTH BELOIT, IL	In transit
8:41 AM	SAINT PAUL, MN	Departed FedEx location

Saturday, October 2, 2021

12:12 PM SAINT PAUL, MN Arrived at FedEx location

8:15 AM MAHTOMEDI, MN In transit

Friday, October 1, 2021

7:19 PM BISMARCK, ND Left FedEx origin facility

4:39 PM BISMARCK, ND Arrived at FedEx location

9:16 AM BISMARCK, ND Picked up

Thursday, September 30, 2021

1:28 PM Shipment cancelled by sender

1:13 PM Shipment information sent to FedEx

Shipment Facts

TRACKING NUMBER

774849321813

SERVICE

FedEx Ground

REFERENCE

Reyne Kadrmas

WEIGHT

7.4 lbs / 3.36 kgs

DIMENSIONS

12x10x7 in.

TOTAL PIECES

1

TERMS

Shipper

PACKAGING

Package

SHIP DATE

10/1/21 [?](#)

STANDARD TRANSIT

10/7/21 [?](#)

ACTUAL DELIVERY

10/7/21 at 1:35 pm [?](#)



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774849250313

[ADD NICKNAME](#)

Delivered
Thursday, October 7, 2021 at 1:36 pm

**DELIVERED**

Signature not required

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Bismarck, ND US

TO

Washington, DC US

Travel History

TIME ZONE

Local Scan Time



Thursday, October 7, 2021

1:36 PM	Washington, DC	Delivered Left at front door. Signature Service not requested.
2:51 AM	BELTSVILLE, MD	On FedEx vehicle for delivery
2:00 AM	BELTSVILLE, MD	At local FedEx facility

Wednesday, October 6, 2021

7:36 PM	HAGERSTOWN, MD	Departed FedEx location
12:08 PM	HAGERSTOWN, MD	Arrived at FedEx location
9:51 AM	BRUSH CREEK TWP, PA	In transit

Tuesday, October 5, 2021

8:48 PM	SOUTH BELOIT, IL	In transit
8:41 AM	SAINT PAUL, MN	Departed FedEx location

Saturday, October 2, 2021

11:59 AM	SAINT PAUL, MN	Arrived at FedEx location
8:15 AM	MAHTOMEDI, MN	In transit

Friday, October 1, 2021

7:19 PM	BISMARCK, ND	Left FedEx origin facility
4:39 PM	BISMARCK, ND	Arrived at FedEx location
9:16 AM	BISMARCK, ND	Picked up

Thursday, September 30, 2021

1:13 PM		Shipment information sent to FedEx
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Shipment Facts

TRACKING NUMBER

774849250313

SERVICE

FedEx Ground

REFERENCE

Reyne Kadrmas

WEIGHT

7.7 lbs / 3.49 kgs

DIMENSIONS

13x13x4 in.

TOTAL PIECES

1

TERMS

Shipper

PACKAGING

Package

SHIP DATE

10/1/21 ?

STANDARD TRANSIT

10/7/21 ?

ACTUAL DELIVERY

10/7/21 at 1:36 pm ?



Affidavit of Publication

Colleen Park, being duly sworn, states as follows:

1. I am the designated agent, under the provisions and for the purposes of, Section 31-04-06, NDCC, for the newspapers listed on the attached exhibits.

2. The newspapers listed on the exhibits published the advertisement of: **Oil and Gas Division - beginning with Case No. 29029; Mercer County;** 1 time(s) as required by law or ordinance.

3. All of the listed newspapers are legal newspapers in the State of North Dakota and, under the provisions of Section 46-05-01, NDCC, are qualified to publish any public notice or any matter required by law or ordinance to be printed or published in a newspaper in North Dakota.

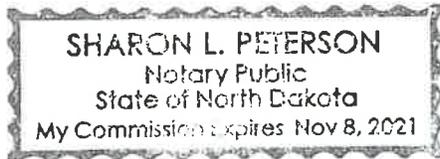
Signed: Colleen Park

State of North Dakota

County of Burleigh

Subscribed and sworn to before me this 14 day of Oct., 2021.

Sharon L. Peterson



SP

**NOTICE OF HEARING
N.D. INDUSTRIAL COMMISSION
OIL AND GAS DIVISION**

The North Dakota Industrial Commission will hold a public hearing at 09:00 AM Tuesday, November 02, 2021 at N.D. Oil & Gas Division 1000 East Calgary Avenue Bismarck, North Dakota. At the hearing the Commission will receive testimony and exhibits. Persons with any interest in the cases listed below, take notice.

PERSONS WITH DISABILITIES: If at the hearing you need special facilities or assistance, contact the Oil and Gas Division at 701-328-8038 by Tuesday, October 19, 2021.

STATE OF NORTH DAKOTA TO: Case No. 29029: Application of Minnkota Power Cooperative, Inc. requesting consideration for the geologic storage of carbon dioxide from the Milton R. Young Station located in Sections 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 17, 18, 19, 20, 21, Township 141 North, Range 83 West, Sections 1, 2, 12, 13, Township 141 North, Range 84 West, Sections 19, 20, 21, 22, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, Township 142 North, Range 83 West, Sections 35, 36, Township 142 North, Range 84 West, Oliver County, North Dakota pursuant to North Dakota Administrative Code Section 43-05-01. View the draft storage facility permit, fact sheet, and storage facility permit application at www.dmr.nd.gov/oilgas/. Minnkota intends to capture carbon dioxide from the Milton R. Young Station and sequester it in the Broom Creek Formation. The Commission will accept and consider written comments on the merits of the application and draft permit if received no later than 5:00 pm CDT November 1, 2021. Submit written comments to the Oil and Gas Division, 1016 East Calgary Avenue, Bismarck, North Dakota 58503-5512 or brkadrmas@nd.gov. Further draft permit information may be obtained from Steve Fried, and further hearing information may be obtained from Bethany Kadrmas, both at the North Dakota Oil and Gas Division, 1016 East Calgary Avenue, Bismarck, North Dakota 58503-5512, 701-328-8020. Minnkota Power Cooperative, Inc., 5301 32nd Avenue South, Grand Forks, ND 58201.

Case No. 29030: Application of Minnkota Power Cooperative, Inc. to consider the amalgamation of the storage reservoir pore space, in which the Commission may require that the pore space owned by nonconsenting owners be included in the geologic storage facility and subject to geologic storage, as required to operate the Minnkota Power Cooperative, Inc. storage facility located in Sections 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 17, 18, 19, 20, 21, Township 141 North, Range 83 West, Sections 1, 2, 12, 13, Township 141 North, Range 84 West, Sections 19, 20, 21, 22, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, Township 142 North, Range 83 West, Sections 35, 36, Township 142 North, Range 84 West, Oliver County, North Dakota, in the Broom Creek Formation, pursuant to North Dakota Century Code Section 38-22-10.

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Signed by,
Doug Burgum, Governor
Chairman, NDIC
(9-30-21)

*** Proof of Publication ***



State of North Dakota)
County of Morton) SS:

Before me, a Notary Public for the State of North Dakota personally

appeared Jill LINDSAY who being duly sworn, deposes and says that he (she) is the Clerk of the Mandan News, and that the publication(s) were made through the

Mandan News on the following dates:

10/1/2021

Signed Jill Lindsay

OIL & GAS DIVISION

600 E BLVD AVE #405
BISMARCK, ND 58505

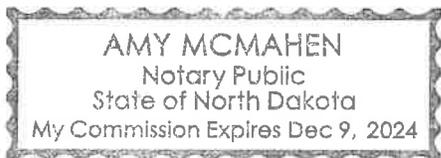
ORDER NUMBER 35084

Sworn and subscribed to before me this 1st day of

October 20 21

Amy McMahon

Notary Public in and for the State of North Dakota



Section: Legals

Category: 5380 Public Notices

PUBLISHED ON: 10/01/2021

TOTAL AD COST: 214.80

FILED ON: 10/1/2021

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Signed by,
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Chairman, NDIC
10/1 - 35084

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Chairman, NDIC
(9-30-21)

Affidavit of Publication

STATE OF NORTH DAKOTA,
COUNTY OF OLIVER, ss.

I, Lori Cox, being first duly sworn, on oath says, that she is the bookkeeper of the CENTER REPUBLICAN, a weekly newspaper published in Center, County of Oliver, and has full and personal knowledge of all the facts herein stated; that said newspaper is a legal newspaper and has a bona fide circulation of at least two hundred copies weekly, and has been published within said county for fifty-two successive weeks next prior to the publication of the notice herein mentioned; that the

Minnkota Legal

ND Mineral Resources Oil & Gas Division

a printed copy of which, taken from the paper in which same was published, is attached to this sheet, and is made a part of this Affidavit, was published in said newspaper at least once each week for 1 successive week, on the day of each week on which said newspaper was regularly published to-wit:

12 - Center Republican: 9/30/2021

That the full amount of the fees for
the publication of the annexed notice is: \$ 147.60

Lori Cox

Subscribed and sworn to before me this 10/12/2021

Arden Nelson

Arden Nelson, Notary Public
State of South Dakota

My commission expires August 1, 2025



*** Proof of Publication ***

State of North Dakota)
County of Burleigh) SS:



Before me, a Notary Public for the State of North Dakota personally

appeared Jill LINDSAY who being duly sworn, deposes and says that he (she) is the Clerk of Bismarck Tribune Co., and that the publication(s) were made through the

Bismarck Tribune on the following dates:

9/29/2021

Signed Jill Lindsay

OIL & GAS DIVISION

600 E BLVD AVE #405
BISMARCK, ND 58505

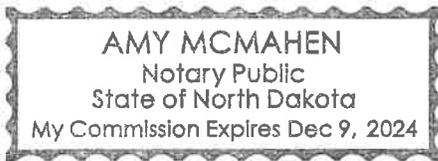
ORDER NUMBER 35106

Sworn and subscribed to before me this 29th day of

September 20 21

Amy McMahon

Notary Public in and for the State of North Dakota



Section: Legals

Category: 5380 Public Notices

PUBLISHED ON: 09/29/2021

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