

EMERGENCY AND REMEDIAL RESPONSE PLAN SUMMARY

40 CFR 146.94(a)

Sutter CCUS, LLC

1.0 Facility Information

Facility name: Sutter Energy Center
CCS 1 Well
CCS 2 Well
CCS 3 Well

Facility contact: Barbara McBride, Director of Strategic Origination Development
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Well location: Robbins, Sutter County, CA



The Emergency and Remedial Response Plan (ERRP) describes actions Sutter CCUS shall take to address movement of the injection or formation fluid in a manner that may endanger an underground source of drinking water (USDW) during the construction, operation, or post-injection site care periods.

If Sutter CCUS obtains evidence that the injected CO₂ stream and/or associated pressure front may cause an endangerment to a USDW, Sutter CCUS, must perform the following actions:

- Initiate shutdown plan for the injection well.
- Take all steps reasonably necessary to identify and characterize any release.
- Notify the permitting agency (UIC Program Director) of the emergency event within 24 hours.
- Implement applicable portions of the approved ERRP.

2.0 Overall Strategy and Approach for Emergency and Remedial Response

Resources in the vicinity of the Sutter Energy Center Sequestration Well #1 (CCS 1), Sequestration Well #2 (CCS 2), and Sequestration Well #3 (CCS 3) that may be affected as a result of an emergency event at the project site include: Underground Sources of Drinking Water (USDWs); potable water wells; Environmentally Protected Areas; Sacramento River; Sutter National Wildlife Refuge, .

Infrastructure in the vicinity of the Sutter Energy Center that that may be affected as a result of an emergency at the project site include: Wellhead at CCS 1, CCS 2, and CCS 3; Sutter Mutual Water.

Monitoring, control, and routine maintenance of the injection operations will be the responsibility of the Injection Operations Staff. Site personnel, project personnel, and local authorities will be relied upon to

implement the ERRP. A site-specific emergency contact list will be developed and maintained during the life of the project. Equipment needed in the event of an emergency and remedial response will vary, depending on the triggering emergency event.

Response actions (cessation of injection, well shut-in, and evacuation) will generally not require specialized equipment to implement. Where specialized equipment (such as a drilling rig or logging equipment) is required, Sutter CCUS, shall be responsible for its procurement.

Sutter CCUS will communicate to the public about any event that requires an emergency response to ensure that the public understands what happened and whether or not there are any environmental or safety implications. The amount of information, timing, and communications method(s) will be appropriate to the event, its severity, whether any impacts to drinking water or other environmental resources occurred, any impacts to the surrounding community, and their awareness of the event.

Sutter CCUS will describe what happened, any impacts to the environment or other local resources, how the event was investigated, what responses were taken, and the status of the response. For responses that occur over the long-term (e.g., ongoing cleanups), Sutter CCUS will provide periodic updates on the progress of the response action(s).

Sutter CCUS will also communicate with entities who may need to be informed about or take action in response to the event, including local water systems, CO₂ source(s) and pipeline operators, land owners, and Regional Response Teams (as part of the National Response Team).