



REGION 9

SAN FRANCISCO, CA 94105

August 29, 2024

Sent electronically only

Faisal Latif
Technical Manager
Carbon TerraVault Holdings LLC
27200 Tourney Road, Suite 200
Santa Clarita, CA 91355

Re: Technical Review of Application – Set 2
Carbon TerraVault Holdings LLC (CTV) II Project
Underground Injection Control (UIC) Permit Application
Class VI Pre-Construction Permit Application No. R9UIC-CA6-FY22-4.1-4.5

Dear Faisal Latif:

The United States Environmental Protection Agency, Region 9 (EPA) has identified additional information or clarification needed for continued evaluation of the subject permit application. The comments are included in four Enclosures to this letter: Evaluation of CTV's Responses to EPA's Comments on Site Characterization, Evaluation of CTV's Responses to EPA's Comments on Computational Modeling, Evaluation of CTV II Project Plans, and Evaluation of CTV II Project Financial Responsibility Information. Note that the project plans we evaluated include the well operation plan, well corrective action plan, well testing and monitoring plan, post-injection site care and site closure plan, emergency and remedial response plan, well construction and plugging plan, and pre-operational testing plan. Also note that the evaluation of the project financial responsibility information enclosure contains certain information claimed as confidential by CTV and will be provided to CTV separately in a secure way that CTV agreed upon.

Please submit the information requested in the Enclosures by September 30, 2024. If additional time is needed to respond, CTV should submit to EPA a written request for extension that

provides a proposed alternative due date and a justification for the time extension. If you have any questions about this letter and the Enclosures, please call me at (415) 972-3971, or contact Calvin Ho at (415) 972-3262.

Sincerely,

David Albright
Manager, Groundwater Protection Section

Enclosures: Evaluation of CTV's Responses to EPA's Comments on Site Characterization
Evaluation of CTV's Responses to EPA's Comments on Computational Modeling
Evaluation of CTV II Project Plans
[Confidential] Evaluation of CTV II Project Financial Responsibility Information

cc: Erwin Sison, CalGEM Northern District
Alex Olsen, Central Valley Regional Water Quality Control Board
Jason Dunn, California State Water Resources Control Board