

November 21, 2025

Via E-mail

Mr. David Albright
Manager, Groundwater Protection Section
U.S. Environmental Protection Agency, Region 9
75 Hawthorne Street
San Francisco, CA 94105

Re: Withdrawal of Confidential Business Information Claims for Underground Injection Control (UIC) Class VI Permit Application No. R9-UIC-CA6-FY24-2.1 to 2.7 (CTV VI)

Dear Mr. Albright,

I write regarding claims of confidential business information (CBI) asserted by Carbon TerraVault Holdings, LLC, a wholly owned subsidiary of California Resources Corporation (together, the “Companies”) in conjunction with Safe Drinking Water Act (“SDWA”) Underground Injection Control (“UIC”) Program Class VI permit application No. R9-UIC-CA6-FY24-2.1 to 2.7 for the Carbon TerraVault IV (CTV VI) Storage Project, currently pending before the U.S. Environmental Protection Agency Region 9 (“EPA”).

As part of the UIC Class VI permit application No. R9-UIC-CA6-FY24-2.1 to 2.7 (CTV VI), the Companies submitted certain information that is confidential and the disclosure of which would harm the Companies’ competitive interests. This information was thus redacted as CBI. In view of the Companies’ desire to effect the greatest possible transparency while maintaining necessary protections over its most critical CBI, the Companies have determined that some of the information previously marked as CBI can instead be treated as nonconfidential. The Companies are now withdrawing select CBI claims related to the project’s location and size, corrective action determinations, plugging plans, well schematics, and financial assurance demonstration/cost estimates.

Specifically, the Companies are withdrawing CBI claims over location-based information, including the exact location of the wells, the names of the geologic formations to be used for storage, the names of nearby landmarks, and other information that would indicate what surface and subsurface area the project would occupy and utilize. The Companies are also withdrawing all CBI claims over the financial assurance demonstration information currently provided in Attachment H.

The Companies continue to maintain the originally-asserted CBI claims pertaining to all well simulation files and all documentation relating to the financial assurance instrument(s) (i.e., the documents supporting the information provided in Attachment H). All CBI claims from materials

other than the well simulation files and the documentation relating to the financial assurance instrument(s) may be removed. For clarity, a CBI index for CTV VI is included in Attachment 1, noting where the Companies are maintaining claims of CBI.

Should you have any questions, please do not hesitate to contact me at Faisal.Latif@crc.com or at (661) 623-1824.

Sincerely,

faisal latif

Faisal Latif
Carbon TerraVault Holdings, LLC

CC: Alexa Engelman, EPA Region 9, Office of Regional Counsel, engelman.alex@epa.gov

Attachment 1: CTV VI Index of Confidential Business Information Maintained (Nov. 2025)

Document	Page(s)	Description	FOIA Exemptions	CBI Claims Maintained as of February 2025
Class VI Financial Responsibility Instruments	Forthcoming documents to be marked upon submission.	Confidential Financial Information	4	All CBI claims maintained
Simulation Files	Entire File	Proprietary Modeling	4, 9	All CBI claims maintained