

**Enclosure – Area of Review Delineation Modeling (Risk-Based Approach)
Request for Additional Information**

*Carbon TerraVault (CTV) VI Carbon Capture and Storage (CCS) Project
Underground Injection Control (UIC) Permit Application
Class VI Pre-Construction Permit Application Nos. R9UIC-CA6-FY24-2.1 to 2.7*

This Enclosure for the proposed CTV VI Class VI geologic sequestration project summarizes the review of the Area of Review (AoR) modeling approach, specifically the *RTC_Attachment 1_Risk Based AoR* document.

While the risk-based AoR approach may be appropriate for this site, EPA identified concerns with the method of calculation that must be resolved before EPA can make a determination on the acceptability and the potential risk to the underground source of drinking water (USDW).

1. Please explain the use of 20m dispersivity for all directions. Standard practice is to use 1/10 the flow path for longitudinal dispersivity and 1/100 the flow path length for transverse dispersivity.
2. Longitudinal dispersivity is along the flow and transverse is perpendicular to the flow. There should be no vertical dispersivity. Explain what was done.
3. Uncertainty should be shown on the AoR given a range of realistic parameters for primary transport. The USDW gradient, dispersivity, and permeability are likely key parameters that should be varied to show a range of possible AoR behavior.
4. Justify the claim that no risk would be posed to the USDW due to the calculated maximum total dissolved solids increase.