



REGION 9

SAN FRANCISCO, CA 94105

August 21, 2025

Sent via email only

William Chessum
California Resources Corporation
27200 Tourney Road, Suite 200
Santa Clarita, CA 91355

Re: Technical Review of Application – Round 2

Carbon TerraVault Holdings LLC (CTV) VI Project
Underground Injection Control (UIC) Permit Application
Class VI Pre-Construction Permit Application No. R9UIC-CA6-FY24-2.1 to 2.7

Dear William Chessum:

The United States Environmental Protection Agency, Region 9 (EPA) has identified information or clarification needed for continued evaluation of the following sections of the permit application:

- Operating Procedures, Appendix 4
- Corrective Action Plan, Attachment B
- Testing and Monitoring Plan, Attachment C
- Post-Injection Site Care and Site Closure Plan, Attachment E
- Proposed Emergency and Remedial Response Plan, Attachment F
- Well Construction and Plugging Plans, Attachment D and Attachment G
- Financial Responsibility Demonstration, Attachment H
- Pre-Operational Testing Plan, Attachment I

The comments are included in Enclosure 1: Evaluation of Project Plans. This letter also includes Enclosure 2: Endangered Species Act guidance, and Enclosure 3: National Historic Preservation Act guidance.

The evaluation includes all CTV VI application modules except for the Geologic Characterization and the Area of Review evaluations, as EPA sent comments on those modules separately on May 13, 2025.

Please respond with the information requested in Enclosure 1 by September 22, 2025. The information requested in Enclosures 2 and 3 is not part of EPA's technical review, however as noted in the guidance documents, the earlier in the permit review process that this material is provided to EPA the better positioned EPA is to meet statutory and regulatory requirements under

the ESA and NHPA, and ensure a timely review of permit applications. If you are not able to provide the information requested in Enclosures 2 and 3 at the time you submit responses for Enclosure 1, please provide an estimated date when you expect to provide the information to EPA. If you have any questions about this letter or the Enclosures, please contact Abby Farrell at (415) 972-3937, or call me at (415) 972-3971.

Sincerely,

David Albright
Manager, Groundwater Protection Section

Enclosures: 1) Evaluation of Project Plans (contains confidential business information, CBI)
2) Endangered Species Act guidance
3) National Historic Preservation Act guidance

cc (w/out Enclosure 1): Chris Jones, CalGEM Central District
Alex Olsen, Central Valley Regional Water Quality Control Board
Jason Dunn, California State Water Resources Control Board