



**REGION 9**

SAN FRANCISCO, CA 94105

October 27, 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 3**

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 subject permit application. Specifically, EPA has comments on the risk-based Area of Review delineation modeling approach, which was summarized in the *RTC\_Attachment 1\_Risk Based AoR* document dated September 4, 2025. EPA's comments are included in the Enclosure to this letter.

Please submit the information requested in the Enclosure by November 26, 2025. If you have any questions about this letter or the Enclosure, please contact Abby Farrell at (415) 972-3937, or call me at (415) 972-3971.

Sincerely,

**DAVID ALBRIGHT**

Digitally signed by DAVID  
ALBRIGHT

Date: 2025.10.27 14:28:39 -07'00'

David Albright  
Manager, Groundwater Protection Section

Enclosure: Area of Review Delineation Modeling Approach (Risk-Based Approach)

cc: Chris Jones, CalGEM Central District  
Alex Olsen, Central Valley Regional Water Quality Control Board  
Jason Dunn, California State Water Resources Control Board