



REGION 9

SAN FRANCISCO, CA 94105

Sent electronically only

February 27, 2025

Travis Lane
Chief Executive Officer
Tulare County Carbon Storage Project LLC

Re: Administrative Review – Notice of Complete Application
Tulare County Carbon Storage Project (TCCSP)
Underground Injection Control (UIC) Permit Application
Class VI Pre-Construction Permit Application No. R9UIC-CA6-FY25-1.1-1.2

Dear Travis Lane:

The United States Environmental Protection Agency, Region 9 (EPA), pursuant to 40 CFR §124.3(c), has conducted an administrative review of the subject permit application by the Tulare County Carbon Storage Project LLC (TCCSP) for two (2) proposed injection wells located in Tulare County, California. Following our review of TCCSP's initial application, received on October 7, 2024, and updated application materials received on December 13, 2024, via the Geologic Sequestration Data Tool (GSDT), we have determined the application is administratively complete.

In our November 13, 2024 Notice of Deficiency/Incomplete Application (NOD) to TCCSP, we noted that in instances where an applicant maintains confidentiality claims over fundamental project information¹ beyond the administrative review phase of the permitting process, we may defer or pause our technical evaluation of the application until such confidentiality claims are released by the applicant. During EPA's call with TCCSP's representatives on November 15, 2024, regarding the NOD and again on February 26, 2025, TCCSP indicated they would reassess their confidentiality claims for fundamental project information when the administrative review of the application concludes. As such, we request that TCCSP consider its existing confidentiality claims, especially pertaining to fundamental project information, and respond to EPA with a description and index of any withdrawn confidentiality claims.

Once TCCSP clarifies its confidentiality claims, EPA will proceed with our technical review of the application. Please note that during the technical review phase, we may request additional information

¹ Fundamental project information includes but is not limited to the location of the proposed injection and monitoring wells, the area of review (AoR) of the proposed storage site, the characteristics of the proposed injection and confining zones, all identified wells within the AoR, the baseline geochemical data on all underground sources of drinking water in the AoR, and the proposed operating data, such as the maximum injection pressure and rate.

and clarification of previously submitted information. Enclosed with this letter is a tentative project decision schedule for our review of the application.

If you have any questions about this letter, please contact Calvin Ho at (415) 972-3262, or call me at (415) 972-3971.

Sincerely,

David Albright
Manager, Groundwater Protection Section

Enclosure: Class VI Tentative Project Decision Schedule – Tulare County Carbon Storage Project

cc (via email): Chris Jones, CalGEM Central District
Alex Olson, Central Valley Regional Water Quality Control Board
Jason Dunn, California State Water Resources Control Board