



REGION 9

SAN FRANCISCO, CA 94105

April 24, 2026

Transmitted via Email and GSDT Upload

Joseph Jephson
Storage Development Manager
Carbon TerraVault Holdings LLC
27200 Tourney Road, Suite 200
Santa Clarita, CA 91355

**RE: Underground Injection Control (UIC) Permit Application R9UIC-CA6-FY22-5.1 to 5.6
Class VI Pre-Construction Permit Application – CTV III
Permit Application Review Schedule**

Dear Mr. Jephson:

U.S. Environmental Protection Agency Region 9 (EPA) is reviewing the Carbon TerraVault Holdings LLC (CTV) UIC Class VI permit application received via the Geologic Sequestration Data Tool (GSDT) for the CTV III project, application number R9UIC-CA6-FY22-5.1 to 5.6 for new injection wells in San Joaquin County, California.

EPA deemed your permit application administratively complete on January 30, 2023, pursuant to 40 CFR §§124.3(c) and 144.31(d). Since then, EPA has developed a new process to expedite Class VI permit application reviews and determinations. This new process uses an updated completeness tool to help determine the next steps and schedule for each application. The tool does *not* change the previously issued completeness determinations; rather, the information supports an understanding of the technical review timeline needed and clarity on whether an application will need significant revision before the agency can conclude technical review. EPA recently evaluated all Class VI applications under review, including your application, with this tool.

Based on EPA's evaluation, your permit application will likely require some revision/clarification to conclude technical review. This determination was based on the following aspects of your application that will impact the Agency's review.

- *There are numerous abandoned wells within the AOR that EPA is evaluating for corrective action that require additional consideration before a final determination is made.*
- *CTV is proposing an alternative PISC timeframe and the supplemental information to support the alternative PISC timeframe request requires additional review time for EPA.*

- *Financial responsibility information pursuant to 40 CFR 146.85 (e.g., records of the proposed financial instruments) has not been provided, and the specifics of the project may require additional time for EPA to complete reviews of the financial responsibility information.*
- *Information necessary for EPA to comply with 40 CFR 144.4 and applicable Federal laws (e.g., NHPA, ESA) has not been provided, and the specifics of the project may require additional time for EPA to complete reviews for 40 CFR 144.4 and applicable federal laws.*

Region 9 has developed a tentative decision schedule for this application, provided below. Please note that the final permit decision may only be issued after the conclusion of technical review, public participation, and EPA review of public comments. The decision schedule is not legally binding, though EPA anticipates that the tentative decision schedule provided to the applicant following completeness review will be followed in most cases.

Permit Decision Schedule

Permitting Milestone	Anticipated Date
Technical review completed	10/30/2026
Draft permit decision issued; start of public comment period	12/30/2026
Public hearing (if applicable)	1/29/2027
Public comment period closes	1/29/2027
Final permit decision, including responses to public comments received	3/29/2027

During the permit application technical review, EPA may request additional information. If you do not provide the information necessary for a permit decision in a timely manner and/or are not responsive to requests for additional information (RAIs), your permit decision timeline will be extended. To support the application review process, please do not make any changes to the permit application, including the narrative, plans, or any attachments/appendices, unless requested to do so by EPA as part of an RAI. If you wish to make non-substantial changes outside of any changes requested by EPA, contact the permit writer to discuss the proposed changes and how they may affect the permit decision timeline. CTV will be kept apprised of the status of EPA's review of the permit application and any changes to the anticipated schedule.

If the timeline given in this letter is unsatisfactory or the applicant wishes to make substantial changes to their application, CTV may withdraw the application, revise the application to reconsider some of the project-specific complexities noted above, and resubmit the application to EPA via the GSDT. If these items are addressed in the resubmission, a modified review timeline may be appropriate. Please contact Calvin Ho at the email address below if you need additional information or clarification.

If you have any questions about this letter, please contact Calvin Ho at Ho.Yenhung@epa.gov.

Sincerely,

David Albright
Manager, Groundwater Protection Section

cc (via email): Chris Jones, CalGEM Central District
Alex Olsen, Central Valley Regional Water Quality Control Board
Jason Dunn, CA State Water Resources Control Board
Eric Morita, CA State Water Resources Control Board