



REGION 9

SAN FRANCISCO, CA 94105

May 19, 2025

Sent electronically only

Faisal Latif
Technical Manager
Carbon TerraVault Holdings LLC
27200 Tourney Road, Suite 200
Santa Clarita, CA 91355

Re: Technical Review of Application – Set 3
Carbon TerraVault Holdings LLC (CTV) III Project
Underground Injection Control (UIC) Permit Application
Class VI Pre-Construction Permit Application No. R9UIC-CA6-FY22-5.1-5.6

Dear Faisal Latif:

The United States Environmental Protection Agency, Region 9 (EPA) has reviewed CTV's revised permit application materials submitted on February 14, 2025, and identified additional information or clarification needed for continued evaluation of the subject permit application. The comments are included in four Enclosures to this letter: Evaluation of CTV III Project Plan Response, Evaluation of CTV III Site Characterization Response, Evaluation of CTV III AoR Model Response, and Evaluation of CTV III Project Financial Responsibility Response. Note that project plans evaluated include the well operation plan, well corrective action plan, well testing and monitoring plan, post-injection site care and site closure plan, emergency and remedial response plan, well construction and plugging plan, and pre-operational testing plan. Also note that the evaluation of the project financial responsibility information enclosure contains certain information claimed as confidential by CTV and will be provided to CTV separately in a secure way that CTV agreed upon.

Please submit the information requested in the Enclosures by June 20, 2025. If additional time is needed for response, CTV should submit to EPA a written request for extension that provides a proposed alternative due date and a justification for the time extension. If you have any questions about this letter and the Enclosures, please call me at (415) 972-3971, or contact Calvin Ho at (415) 972-3262.

Sincerely,

David Albright
Manager, Groundwater Protection Section

Enclosures:

Evaluation of CTV III Project Plan Response
Evaluation of CTV III Site Characterization Response
Evaluation of CTV III AoR Model Response
[Confidential] Evaluation of CTV III Project Financial Responsibility Response

cc:

Trey Powell, CalGEM Northern District
Alex Olsen, Central Valley Regional Water Quality Control Board
Jason Dunn, California State Water Resources Control Board