



REGION 9

SAN FRANCISCO, CA 94105

October 6, 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 – Round 4
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 evaluated CTV's August 2025 responses to our comments on various modules of the subject permit application and identified follow-up requests/comments for CTV regarding the responses. These requests/comments are included in Enclosure 1: Evaluation of CTV's August 2025 responses, and Enclosure 2: Evaluation of Alternative PISC Timeframe.

In addition, to assist EPA in evaluating ESA and NHPA compliance for your proposed project, we are requesting that you provide relevant biological and cultural resource information. Please find enclosed two documents that detail the information we are requesting. This information is essential for EPA to complete our evaluation and obtain concurrence from the United States Fish and Wildlife Service (USFWS) for ESA compliance and from the State Historic Preservation Office (SHPO) regarding NHPA compliance.

Please respond with the information requested in Enclosures 1 and 2 by November 5, 2025. The information requested in Enclosures 3 and 4 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 3 and 4 at the time you submit responses for Enclosures 1 and 2, 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 Calvin Ho at (415) 972-3262, or call me at (415) 972-3971.

Sincerely,

David Albright
Manager, Groundwater Protection Section

Enclosures: 1) Evaluation of CTV's August 2025 responses
 2) Evaluation of Alternative PISC Timeframe
 3) Endangered Species Act Guidance
 4) National Historic Preservation Act Guidance

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