



REGION 9 ADMINISTRATOR

SAN FRANCISCO, CA 94105

April 20, 2026

Sent electronically only

Joseph Jephson
California Resources Corporation (CRC)
Aera Energy/Carbon Frontier
27200 Tourney Road, Suite 200
Santa Clarita, CA 913558

**RE: Underground Injection Control (UIC) Permit Application R9UIC-CA6-FY23-1.1-1.9
Class VI Pre-Construction Permit Application**

Dear Mr. Jephson,

The U.S. Environmental Protection Agency (EPA) is taking action to promote streamlined, transparent, and nationally consistent process reforms for EPA's Underground Injection Control (UIC) Class VI permitting program. These reforms demonstrate EPA's commitment to timely and thorough review of all permit applications, under Administrator Lee Zeldin's *Powering the Great American Comeback Initiative*.

In the past, EPA's UIC Class VI permitting program took more than two years to issue final permit decisions, with almost half of the applications falling behind schedule. In part, this was due to an ineffective first-in, first-out prioritization process that often resulted in poor quality applications requiring significant back-and-forth between EPA and applicants to obtain sufficient information for review. This was a waste of government and industry resources. EPA is working to reduce time-to-permit decisions and eliminate the backlog of applications with new tools and streamlined processes that incorporate multiple best practices. EPA is implementing this new review process nationwide and working towards an eventual goal of issuing draft permits within one year of determining an application is complete. To accomplish this goal, we are determined to work more closely with Class VI applicants to ensure that our permitting teams are processing complete, high-quality applications that achieve administrative completeness as soon as possible.

An important element of EPA's updated process is an effort to better evaluate pending and new applications based on their complexity and completeness to determine which applications require minimal effort to process; which have challenges; and, which need substantial work. This will enable projects that are less technically complex to advance more quickly, and projects with greater complexity to receive the additional support they need. This evaluation will utilize an [updated completeness tool](#) to determine the complexities and gaps in each application. The tool is based on EPA's experience and does not change any previously issued completeness determinations. Instead, the new tool helps to clarify the project characteristics that may impact the timeline for technical

review and whether an application will need substantial revision before the agency can conclude the technical review. Please note that EPA has not altered its UIC permitting regulations, and those regulations continue to apply, including the criteria under which EPA makes permitting decisions.

EPA is currently evaluating all pending Class VI applications under the agency's new process, including the updated completeness tool, to develop customized permit decision schedules. In the coming week, my team will share an updated permit decision schedule with you via separate correspondence. Moving forward, the agency's expected time to permit will be guided by these custom schedules that account for project complexities, rather than following a first-in, first-out prioritization process.

EPA is also developing future Class VI permitting-process improvements, including additional internal tools to supplement and guide enhanced applicant support and further improve the quality of permit applications and guidelines on technical issues that applicants commonly face. EPA expects that these future improvements will contribute to reduced processing time for Class VI permits. With a faster and more transparent permitting process that efficiently leverages resources, EPA can better prioritize clean and safe water for every American, restore American energy dominance, and advance cooperative federalism.

Thank you for your commitment to these principles and for your support in implementing projects that drive new American energy investments. We look forward to sharing additional project-specific updates with you in the coming week. If you have any questions, please contact David Albright at Albright.David@epa.gov.

Sincerely,

Michael Martucci