



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

Sent electronically only

June 28, 2023

William Chessum
California Resources Corporation (CRC)
27200 Tourney Road, Suite 200
Santa Clarita, CA 913558

SUBJECT: Administrative Review – Second Notice of Incomplete Application
Carbon TerraVault Holdings LLC (CTV) IV Project
Underground Injection Control (UIC) Permit Application
Class VI Pre-Construction Permit Application No. R9UIC-CA6-FY23-3.1 to 3.8

Dear William Chessum:

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 for eight (8) proposed Class VI injection wells located in Sacramento County, California. Following the review of your application, received on April 27, 2023, we sent an initial Notice of Incomplete Application on May 25, 2023. We then received an updated application on June 20, 2023 (note that the cover letter was dated June 14, 2023, but your team was unable to submit the application at that time due to technical issues related to the GSĐT).

As stated in our May 25, 2023 letter, 40 CFR 146.82(a)(2) requires that the application include a map showing the injection wells, the Area of Review (AoR), and the below list of items:

- Injection wells,
- Producing wells,
- Abandoned wells,
- Plugged wells or dry holes,
- Deep stratigraphic boreholes,
- State- or EPA-approved subsurface cleanup sites,
- Surface bodies of water,
- Springs,
- Mines (surface and subsurface),
- Quarries,
- Water wells,
- Other pertinent surface features,
- State, Tribal, and Territory boundaries, and
- Roads.

The June 14, 2023 response letter noted that the required items are included in the application on various maps. Pursuant to the regulations and because having the required components on a single map is helpful for the technical reviewers, we again request that a single map be developed that includes all the required components as indicated in 40 CFR 146.82(a)(2).

In addition, our May 25, 2023 letter stated that materials to support compliance with the Endangered Species Act (ESA) and the National Historic Preservation Act (NHPA) are required as part of the permit issuance process. Please provide an anticipated timeline of when you plan to submit the ESA and NHPA information described in the May 25, 2023 letter. Note that we generally recommend starting the ESA and NHPA evaluations as early as possible to avoid delays to permit issuance.

Please submit the updated map and respond to the inquiry regarding the ESA and NHPA timeline by July 14, 2023. If you have any questions or would like to discuss this request further, please contact Abby Farrell at (415) 972-3937, or call me at (415) 972-3971.

Sincerely,

David Albright
Manager, Groundwater Protection Section

cc (via email): Miguel Cabrera, CalGEM Northern District
Alex Olsen, Central Valley Regional Water Quality Control Board
Janice Zinky, CA State Water Resources Control Board