



January 25th, 2024

Via E-mail

Mr. David Albright
Manager, Groundwater Protection Section
U.S. Environmental Protection Agency, Region 9
75 Hawthorne Street
San Francisco, CA 94105

Re: Withdrawal of Select Confidential Business Information Claims for Underground Injection Control (UIC) Class VI Permit Application No. R9UIC-CA6-FY23-6.1-6.6 (CTV V)

Dear Mr. Albright,

I write regarding claims of confidential business information (“CBI”) asserted by Carbon TerraVault Holdings, LLC, a wholly owned subsidiary of California Resources Corporation (together, the “Companies”) in conjunction with Safe Drinking Water Act (“SDWA”) Underground Injection Control (“UIC”) Program Class VI permit application No. R9UIC-CA6-FY23-6.1-6.6 for the Carbon TerraVault V (CTV V) Storage Project, currently pending before the U.S. Environmental Protection Agency Region 9 (“the Region”). In the Companies’ permit application for CTV V submitted on July 31, 2023, the Companies claimed information as CBI which should not be disclosed to the public because the information constitutes “commercial or financial information obtained from a person and privileged or confidential” and thus is exempt from disclosure under the Freedom of Information Act (“FOIA”). 5 U.S.C. § 552(b)(4). The Companies are now withdrawing select CBI claims related to the project’s location and size; other CBI claims for information in the CTV V permit application remain in place.

Specifically, the Companies are withdrawing CBI claims over the location of the wells, the names of the geologic formations to be used for storage, the names of nearby landmarks, and other information that would indicate what surface and subsurface area the project would occupy and utilize. The Companies continue to maintain all other originally-asserted CBI claims. Specifically, the Companies are maintaining CBI claims over the Financial Responsibility Demonstration document, and the well simulation files, as reflected in the Attachment. For clarity, a CBI index for CTV V is included in the Attachment, noting where the Companies are maintaining claims of CBI.

We appreciate EPA’s consideration of this letter. Should you have any questions, please do not hesitate to contact me at faisal.latif@crc.com or at (661) 623-1824.

Mr. David Albright
January 25th, 2024
Page | 2

Sincerely,

Faisal Latif

Faisal Latif
Carbon TerraVault Holdings, LLC

cc: Marcela Von Vacano, EPA Region 9, vonvacano.marcela@epa.gov
Desean Garnett, EPA Region 9, EPA Region 9, garnett.desean@epa.gov
Kaylee Glenney, EPA Region 9, Glenney.Kaylee@epa.gov
Samuel Brown, Hunton Andrews Kurth, slbrown@hunton.com

Attachment (1): CTV V Index of Confidential Business Information (as of January 2024)

Attachment: CTV V Index of Confidential Business Information Maintained (Jan. 2024)

Document	Page(s)	Description	FOIA Exemptions	CBI Claims Maintained as of January 2024
Class VI Financial Responsibility Demonstration; Cost Estimates	Entire Document	Confidential Financial Information	4	All CBI claims maintained
Simulation Files	Entire File	Location Information and Proprietary Modeling	4, 9	All CBI claims maintained