



**REGION 9**

SAN FRANCISCO, CA 94105

August 14, 2024

Jim Levine  
Montezuma Carbon LLC  
2000 Powell Street  
Suite 920  
Emeryville, CA 94608

Sent electronically only

Dear Jim Levine:

On April 3, 2024, the United States Environmental Protection Agency, Region 9 (EPA) sent Montezuma Carbon LLC (Montezuma) a Request for Additional Information (RAI) on the geological site characterization and area of review (AoR) delineation modeling for the Montezuma NorCal Carbon Sequestration Hub Project. EPA received Montezuma's response to this request on May 3, 2024. In the response, several of EPA's questions or requests were not adequately addressed due to a lack of existing site-specific data. As a result, the application still requires updated AoR modeling, sensitivity analyses, geochemical analyses, and geochemical modeling. In the May 3, 2024 response, Montezuma stated they will conduct the required analyses and update the application once they collect site-specific data from a stratigraphic test well. However, Montezuma has indicated that the results from this test well may not be incorporated into the application until sometime in 2025.

EPA has determined that your response to the RAI does not contain sufficient information to move forward with our technical review of the application. As such, we are temporarily pausing our review, while Montezuma works on updating these portions of the application with essential technical information. Once we receive a complete response to the RAI, we will proceed with our technical review. If you have any questions about this letter, please contact me at (415) 972-3971, or call Kaylee Glenney at (415) 972-3944.

Sincerely,

David Albright  
Manager, Groundwater Protection Section

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