



**REGION 9**

SAN FRANCISCO, CA 94105

February 14, 2024

Randy Holmes  
CEO, San Joaquin Renewables LLC  
1521 West F Avenue  
Nevada, IA 50201

Re: Underground Injection Control (UIC) Permit Application  
Class VI Pre-Construction Permit Application No. R9UIC-CA6-FY22-2

Dear Randy Holmes:

The United States Environmental Protection Agency, Region IX (“EPA”) is writing to request that San Joaquin Renewables LLC (“SJR”) withdraw its Class VI pre-construction permit application for onsite injection of CO<sub>2</sub> for geological sequestration, Application No. R9UIC-CA6-FY22-2 (“Application”), by March 29, 2024. If SJR does not withdraw the Application by that date, EPA may proceed with a denial of the permit under 40 C.F.R. § 124.6(b).

As background, on August 7, 2023, EPA provided SJR with the opportunity to clarify a discrepancy between its California Environmental Quality Act Notice of Preparation of a Draft Environmental Impact Report, which indicated no onsite CO<sub>2</sub> injection would take place, and the Application, which proposed CO<sub>2</sub> injection into one onsite well. In September 2023, SJR informed EPA that it will not pursue onsite CO<sub>2</sub> injection for several reasons, including the lack of surface, mineral, and pore space rights around the project area. During a call with EPA on February 6, 2024, SJR confirmed this status. Notwithstanding, as of the writing of this letter, SJR has not withdrawn the Application.

Based on the foregoing, EPA will no longer continue its technical review of the Application and requests that SJR withdraw the Application by March 29, 2024. To withdraw the Application, please submit a letter requesting the withdrawal on official letterhead by email to the Director of the Water Division, Tomás Torres, at [tomas.torres@epa.gov](mailto:tomas.torres@epa.gov) and cc me at [albright.david@epa.gov](mailto:albright.david@epa.gov). Failure to withdraw the Application may result in EPA denying the Application under 40 C.F.R. § 124.6(b). Please note that withdrawal of the Application will not prejudice or adversely affect our consideration of a complete Class VI permit application in the future.

If you have any questions about this letter, please call me at (415) 972-3971, or contact Calvin Ho at (415) 972-3262.

Sincerely,

David Albright  
Manager, Groundwater Protection Section

cc (via email): TJ Paskach, San Joaquin Renewables LLC  
Jerod Smeenk, San Joaquin Renewables LLC  
Brianahi De Leon, City of McFarland  
Lorelei Oviatt, Kern County Planning and Natural Resources  
Chris Jones, CalGEM Central District  
Alex Olsen, Central Valley Regional Water Quality Control Board  
Janice Zinky, CA State Water Resources Control Board