Message

From: Albright, David [Albright.David@epa.gov]
Sent: 2/7/2020 5:06:46 PM
To: Rebecca Hollis [rhollis@cleanenergysystems.com]
CC: McEvoy, Molly [mcevoy.molly@epa.gov]; Ho, Yenhung [Ho.Yenhung@epa.gov]
Subject: FW: Some (hopefully) final questions about submitting Class 6 permit application via the GS Data Tool

Thank you, Molly for the prompt reply!

Rebecca, I hope the information below clarifies the matter for you.

Don't hesitate to let us know if you have other questions.

From: McEvoy, Molly <mcevoy.molly@epa.gov>
Sent: Friday, February 7, 2020 9:04 AM
To: Albright, David <Albright.David@epa.gov>
Cc: Bates, William <bates.william@epa.gov>
Subject: RE: Some (hopefully) final questions about submitting Class 6 permit application via the GS Data Tool

David,

During pre-construction phase reporting, well construction and operating information should be entered into the Project Information Tracking module. Based on attachment names, the best place for CES to upload Attachments A and G is into the **Project Information Tracking** module, **Initial Permit Application** tab, Item **4**. The UIC Class VI Recordkeeping, Reporting, and Data Management Guidance for Owners and Operators (link here) provides some helpful information related to this issue.

In Class VI documentation, EPA considers the attachments to be attachments to the permit itself. If CES also formatted their application in this way, that's fine. Would you like to provide Rebecca with the information above or would you prefer if I reply to her directly?

Thanks,
Molly

Molly McEvoy
Office of Ground Water & Drinking Water
U.S. Environmental Protection Agency
Washington, D.C.
Phone: 202-564-4765

From: Albright, David <Albright.David@epa.gov>
Sent: Friday, February 7, 2020 10:46 AM
To: McEvoy, Molly <mcevoy.molly@epa.gov>
Subject: FW: Some (hopefully) final questions about submitting Class 6 permit application via the GS Data Tool

Hi Molly, can you assist Rebecca with her questions? Thanks, David

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From: Rebecca Hollis <rhollis@cleanenergysystems.com>
Sent: Thursday, February 6, 2020 6:44 PM

To: Albright, David <Albright.David@epa.gov>; Ho, Yenhung <Ho.Yenhung@epa.gov>
Cc: Wayne Rowe <rowe5@slb.com>; Julian Enahoro Ogolo <ogolo1@slb.com>; Wade Zaluski <WZaluski@slb.com>; McEvoy, Molly <mcevoy.molly@epa.gov>
Subject: Some (hopefully) final questions about submitting Class 6 permit application via the GS Data Tool

Hi again David,

We are working our way through the GS Data Tool, uploading (non-confidential) permit application materials for the Mendota and have what I hope are our last questions.

We have prepared the follow documents in support of our Pre-Construction Permit application and know where to upload all but two, the Summary of Requirements and Construction Details (Attachments A and G, highlighted below). I have reviewed the EPA's GS Data Tools User Guides and did not find these documents listed. Can you help identify which module(s) these documents pertain to, or more specifically, where they are to be uploaded in the GS Data Tool? Or perhaps the requirements have changed since we downloaded the templates and these documents are no longer needed? Any assistance you could offer would be most appreciated.

- Class VI Permit Application Narrative
- Attachment A: Summary of Requirements Class VI Operating
- Attachment B: Area of Review and Corrective Action Plan
- Attachment C: Testing and Monitoring Plan
- Attachment D: Injection Well Plugging Plan
- Attachment E: Post-Injection Site Care and Site Closure Plan
- Attachment F: Emergency and Remedial Response Plan
- Attachment G: Construction Details - Clean Energy Systems Mendota
- Attachment H: Financial Assurance Demonstration
- Quality Assurance and Surveillance Plan

Thanks again,
-Rebecca

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