Message

From: Rebecca Hollis [rhollis@cleanenergysystems.com]
Sent: 4/7/2020 10:20:39 PM
To: Albright, David [Albright.David@epa.gov]
Subject: RE: GSDT Notifications for CES Permit App

Hi David,

I hope this email finds you well.

Just wanted to double check you received the Draft Meeting Agenda and List of Attendees for tomorrow's Skype meeting.

Also, you should have received the Meeting Invite with Skype log in instructions. I forwarded it over yesterday afternoon.

Finally, I forwarded the invite to Lex Mitchell at CARB and a few persons from the City of Mendota. I do not have contacts at the State and Central Valley Regional Water Boards or EPA's Office of Air and Radiation. So, if you could please pass along the meeting invite/login information, it would be most appreciated. I do not have contacts at CalGEM but Lex did recommend a few names: Vincent A. and Alan Walker. I can forward the meeting material to these two, staff level folks at CalGEM if you haven't already.

Thanks again,
-Rebecca

Rebecca Hollis
Director Business Development -

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From: Rebecca Hollis
Sent: Monday, April 6, 2020 9:31 AM
To: Albright, David <Albright.David@epa.gov>
Subject: RE: GSDT Notifications for CES Permit App

Hi David,

Happy Monday.

Per our conversation, I put together the attached draft agenda for Wednesday's meeting. It's pretty high level. I put in estimated times only to stress the intention is to hear from all the parties to better understand everyone's role and coordinate efforts.

I also started a list of attendees but didn't get too far. See attached.

Please let me know your comments. I am circulating this to our team as well for comments/feedback.

Thanks again,
-Rebecca

Rebecca Hollis
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From: Rebecca Hollis
Sent: Friday, April 3, 2020 11:02 AM
To: Albright, David <Albright.David@epa.gov>
Subject: RE: GSDT Notifications for CES Permit App

Just got off a conference call. So yes, am available now. Call any time.
-Rebecca

Rebecca Hollis
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From: Albright, David <Albright.David@epa.gov>
Sent: Friday, April 3, 2020 10:41 AM
To: Rebecca Hollis <rhollis@cleanenergysystems.com>
Subject: RE: GSDT Notifications for CES Permit App

Hi Rebecca, do you have time for a brief call? Thanks, David

From: Rebecca Hollis <rhollis@cleanenergysystems.com>
Sent: Thursday, April 2, 2020 2:38 PM
To: Albright, David <Albright.David@epa.gov>
Cc: Ho, Yenhung <Ho.Yenhung@epa.gov>
Subject: RE: GSDT Notifications for CES Permit App

Hi again, David,

As for logistics, we have been using Microsoft Teams for our internal project and staff meetings. So far it has worked pretty well. Schlumberger, who will of course be on the call, uses Skype for their meetings which also works well for screen sharing, etc. I think I would like to propose using their Skype system for the webinar as more people seem to be familiar with that system – and because I am still fumbling to learn Teams – but would be fine with either if you had a preference.

As for additional attendees, I would like to first have a quick discussion with you on the Agenda. Once I have a better feel of the topics to be covered, I can recommend persons/groups who may benefit from attending. To be honest, I am leaning toward less participants only because over these past few weeks have noticed how difficult it can be with just a small group in a webinar, i.e. when everyone tries to talk at one time, mics are muted, or not muted, etc. Obviously, the conditions are not ideal, but I am confident we can have a very useful and informative webinar, we may just have to set a few ground rules ☺

In any case, please let me know your thoughts on the agenda. I am happy to jump on a quick phone call to discuss if that would be easier. My cell # is below.

Thanks again,
-Rebecca

Rebecca Hollis
Director Business Development -

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From: Albright, David <Albright.David@epa.gov>
Sent: Wednesday, April 1, 2020 9:02 AM
To: Rebecca Hollis <rhollis@cleanenergysystems.com>
Cc: Ho, Yenhung <Ho.Yenhung@epa.gov>
Subject: RE: GSDT Notifications for CES Permit App

Thanks Rebecca. I've sent a hold the date/time message for the webinar to our contacts at CalGEM, State and Central Valley Regional Water Boards, CARB, and EPA's Office of Air and Radiation. Let me know how you want to proceed with the logistics and we can finalize the list of attendees. Thanks, David

---

From: Rebecca Hollis <rhollis@cleanenergysystems.com>
Sent: Tuesday, March 31, 2020 2:50 PM
To: Albright, David <Albright.David@epa.gov>
Cc: Ho, Yenhung <Ho.Yenhung@epa.gov>
Subject: RE: GSDT Notifications for CES Permit App

Hi David,

I confirmed with the team that next Wednesday, April-8, at 10am (Pacific) will work for the webinar. Thank you.

Also, per your suggestion, I will see if there are parties from Fresno County and/or City of Mendota that should join the meeting as well. Will revert soon.

Thanks again and best regards,
-Rebecca

Rebecca Hollis
Director Business Development -

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From: Albright, David <Albright.David@epa.gov>
Sent: Tuesday, March 31, 2020 8:31 AM
To: Rebecca Hollis <rhollis@cleanenergysystems.com>
Cc: Ho, Yenhung <Ho.Yenhung@epa.gov>
Subject: RE: GSDT Notifications for CES Permit App

Hi Rebecca, thanks for the message. How about next Wed. (4/8) at 10am for the webinar? We'd probably schedule an hour and a half. Let me know if that would work. Also, if there are particular folks you are working with in Fresno Co. we can include them in the meeting. Thanks! David

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From: Rebecca Hollis <rhollis@cleanenergysystems.com>
Sent: Monday, March 30, 2020 8:20 AM
To: Albright, David <Albright.David@epa.gov>
Cc: Ho, Yenhung <Ho.Yenhung@epa.gov>
Subject: RE: GSDT Notifications for CES Permit App

Hi David,

All safe and well here. Thank you. I hope you are staying safe and healthy too.

I think an introductory call/webinar is a wonderful idea, for exactly the reasons you note. I spoke to the team and they agree. We are available in this week or next – there was really no preference on date since we all are under some form of 'stay at home' order. So, we can work the timing around your or the other parties' needs.

We can discuss agenda in more detail once we settle on a date/time.

Thanks again and happy Monday,
-Rebecca

Rebecca Hollis
Director Business Development -

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From: Albright, David <Albright.David@epa.gov>
Sent: Wednesday, March 25, 2020 1:41 PM
To: Rebecca Hollis <rhollis@cleanenergysystems.com>
Cc: Ho, Yenhung <Ho.Yenhung@epa.gov>
Subject: RE: GSDT Notifications for CES Permit App

Hi Rebecca,
I hope you are doing well and staying safe. We are also dealing with the relatively sudden direction to telework 100% of the time and figuring out how to maintain productivity in this new (temporary) environment. It is a challenge but we are doing the best we can under the circumstances.

One request I have is to see if we can set up a webinar to have CES present the project to a number of our EPA, state, and local counterparts. This idea came up a couple of times in recent discussions I have had with CA State Water Board, CARB, and CalGEM. It would be an opportunity for you to explain the project to many governmental officials at the same time and each agency could also talk a bit about the requirements and processes they implement. I think a session like that would go a long way toward helping the different regulators identify potential opportunities for coordination. Maybe sometime in the next 2-3 weeks, if that is possible?

Anyway, I am assembling a list of invitees and wanted to get your thoughts on this idea. Feel free to call me if you would like to discuss.

Take care,
David

David Albright
Manager, Groundwater Protection Section
USEPA Region 9 (WTR-4-2)
75 Hawthorne Street
San Francisco, CA 94105
415 972-3971

From: Rebecca Hollis <rhollis@cleanenergysystems.com>
Sent: Wednesday, March 25, 2020 10:02 AM
To: Ho, Yenhung <Ho.Yenhung@epa.gov>
Cc: Albright, David <Albright.David@epa.gov>
Subject: RE: GSDT Notifications for CES Permit App

Dear Calvin,

Thank you very much for the letter. This is fantastic news. We very much look forward to progressing into the next stage of the application process, the technical review. We will be sure to be available and responsive to any questions or clarification requests EPA may have on the submitted material.

Please stay safe and healthy during these uncertain times.
As a quick update on our end, CES remains open for business although employees have been instructed to work from home for at least the next few weeks. So, if you need to reach me please call my cell.
We are working through some of the inefficiencies of having moved to a remote staff, so may be a little slower to respond than usual, but rest assured that work is still progressing.

Please let me know if you have any questions.

Thank you again and best regards,
-Rebecca

Rebecca Hollis
Director Business Development -

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From: Ho, Yenhung <Ho.Yenhung@epa.gov>
Sent: Monday, March 23, 2020 4:45 PM
To: Rebecca Hollis <rhollis@cleanenergysystems.com>
Cc: Albright, David <Albright.David@epa.gov>
Subject: RE: GSDT Notifications for CES Permit App

Hi Rebecca,

Please see the attached letter. Let us know if you have questions about the letter.

Regards,
Calvin

Calvin Ho
Groundwater Protection Section
Water Division (WTR-4-2)
U.S. EPA Region 9
75 Hawthorne Street
San Francisco, CA 94105
415-972-3262

From: Rebecca Hollis <rhollis@cleanenergysystems.com>
Sent: Wednesday, March 11, 2020 11:32 AM
To: Ho, Yenhung <Ho.Yenhung@epa.gov>; Albright, David <Albright.David@epa.gov>
Cc: 'Wayne Rowe' <rowe5@slb.com>; 'Wade Zaluski' <WZaluski@slb.com>
Subject: RE: GSDT Notifications for CES Permit App

Hi Calvin,

Thank you again for the call last week regarding our Class VI permit application for the Mendota plant in California. I have since spoke with our team and I wanted to follow up on a few items.

First, regarding the "Proposed Stimulation Program" (included on page 76 of the Narrative, Section 5.1). They confirmed that there is no plan, or need for stimulation. Stimulation would only be contemplated if the permeability (injectivity) of the injection formations were a couple orders of magnitudes lower than what is indicated at the Mendota site.

Second, in regards to secure transfer of the file containing CBI, we like the idea of password protecting the file as an added layer of security. This is something we can easily do and makes sense, especially if you are also familiar with the process/have done this in the past.

When we do send over the file (Narrative) containing CBI, we can include a short note describing the confidential information and why we are requesting it be treated as such. This can support EPA's regional council making a determination about the request. In summary, and as you know from our discussion a few weeks back on this, we are requesting only that certain figures contained within the Project Narrative be treated as CBI. These figures contain seismic data (or derivatives) that were licensed by CES from an outside 3rd party (SEI) – that is, CES does own the information. We have received permission from SEI to share the information with EPA for the purposes of our Class VI permit application evaluation but should these CBI images were released to others, CES would be in breach of the licensing agreement with SEI. Hence why the specific figures/images were redacted from our initial submission.
The Narrative file we plan to send with CBI includes a clear marking on the cover page and on each CBI figure, "This image displays (SEI, 2019) data and it is marked as Confidential Business Information."

We will wait for your instructions on the approve method of electronic confidential file transfer.

In the meantime, let me know if you have any questions or need anything else.

Thanks again and best regards,
-Rebecca

Rebecca Hollis
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From: Rebecca Hollis
Sent: Monday, March 2, 2020 3:56 PM
To: Ho, Yenhung <Ho.Yenhung@epa.gov>; Albright, David <Albright.David@epa.gov>
Cc: Wayne Rowe <rowe5@slb.com>; Wade Zaluski <WZaluski@slb.com>
Subject: RE: GSDT Notifications for CES Permit App

Hi Calvin, David,

Happy Monday.

I just wanted to check in to see if there was any resolution regarding the electronic transmission of CBI. Last I recall, your regional IT security office identified an authorized file transfer service but was checking with HQ to make sure it can be used with CBI.

Thanks again and best regards,
-Rebecca

Rebecca Hollis
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From: Ho, Yenhung <Ho.Yenhung@epa.gov>
Sent: Wednesday, February 19, 2020 10:43 AM
To: Rebecca Hollis <rhollis@cleanenergysystems.com>; Albright, David <Albright.David@epa.gov>
Cc: Wayne Rowe <rowe5@slb.com>; Wade Zaluski <WZaluski@slb.com>
Subject: RE: GSDT Notifications for CES Permit App

Hi Rebecca,

We will let you know if we have questions about the application material.

Thanks,
Calvin

From: Rebecca Hollis <rhollis@cleanenergysystems.com>
Sent: Tuesday, February 18, 2020 5:16 PM
To: Ho, Yenhung <Ho.Yenhung@epa.gov>; Albright, David <Albright.David@epa.gov>
Cc: Wayne Rowe <rowe5@slb.com>; Wade Zaluski <WZaluski@slb.com>
Subject: RE: GSDT Notifications for CES Permit App

OK, great!
I have completed the submission accordingly. Thank you.

Please let us know if you would like to set up a meeting to walk through our application material and/or any other questions you may have.

Thanks again and happy Tuesday,
-Rebecca

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From: Ho, Yenhung <Ho.Yenhung@epa.gov>
Sent: Tuesday, February 18, 2020 4:48 PM
To: Rebecca Hollis <rhollis@cleanenergysystems.com>; Albright, David <Albright.David@epa.gov>
Cc: Wayne Rowe <rowe5@slb.com>; Wade Zaluski <WZaluski@slb.com>
Subject: RE: GSDT Notifications for CES Permit App

Hi Rebecca,

Yes, we concur with this approach. Thanks. Calvin

From: Rebecca Hollis <rhollis@cleanenergysystems.com>
Sent: Tuesday, February 18, 2020 12:14 PM
To: Ho, Yenhung <Ho.Yenhung@epa.gov>; Albright, David <Albright.David@epa.gov>
Cc: Wayne Rowe <rowe5@slb.com>; Wade Zaluski <WZaluski@slb.com>
Subject: RE: GSDT Notifications for CES Permit App

Hi Calvin,

Thank you for the prompt and detailed response.

Per your recommendation, we reviewed Section 3.1.5, "Pre-Operational Testing Program" of the *Recordkeeping, Reporting, and Data Management Guidance for Owners and Operators*. After an internal discussion, we believe the document we prepared titled, "Attachment G: Construction Details" contains the relevant information on injection well construction, pre-injection testing plan, test procedures, etc. required for the "Pre-Operational Testing" module of the GS Data Tool.
As you may recall, Attachment G was one of the documents we were not sure where to upload in the GS Data Tool during our initial submission. After consulting EPA, we added it to the Project Information Tracking module (Initial Permit Application tab, Item 4) – email attached for reference only. Given the RRDM guidance, it make sense that this detail would also apply to the "Pre-Operational Testing" module. So, I have uploaded Attachment G to this module.

As for the Proposed Pre-Operational Testing Schedule, we were able to locate and download a Testing and Monitoring Template (Excel file) from EPA. We have completed this template for the proposed Mendota site and uploaded it as well to the "Pre-Operational Testing" module. So, the "Welcome" tab of the module would look like this:

Attachment G: Construction Details

TM_Spreadsheet_Template.xlsx

Please advise if you concur with this approach.
Since no wells have been drilled or field samples collected yet, the remaining tabs were fairly simple to complete.

If you agree, I believe we can submit the "Pre-Operational Testing" module today, which should, complete our submission for the Mendota site.

Thanks again,
-Rebecca

Rebecca Hollis
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From: Ho, Yenhung <Ho.Yenhung@epa.gov>
Sent: Friday, February 14, 2020 3:08 PM
To: Rebecca Hollis <rhollis@cleanenergysystems.com>; Albright, David <Albright.David@epa.gov>
Cc: Wayne Rowe <rowe5@slb.com>; Wade Zaluski <WZaluski@slb.com>
Subject: RE: GSDT Notifications for CES Permit App

Hi Rebecca,

CES is required to submit into the "Pre-Operational Testing" module a proposed pre-operational well and formation testing program that meets the requirements of 40 CFR 146.87. See Section 3.1.5 of the Recordkeeping, Reporting, and Data Management Guidance for Owners and Operators (attached).

Our regional IT security office identified an authorized file transfer service, but is checking with HQ to make sure it can be used where CBI is involved. We will let you know as soon as we hear back.

Thanks,
Calvin

Calvin Ho
Groundwater Protection Section
Water Division (WTR-4-2)
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75 Hawthorne Street
San Francisco, CA 94105
415-972-3262

From: Rebecca Hollis <rhollis@cleanenergysystems.com>
Sent: Thursday, February 13, 2020 1:10 PM
To: Albright, David <Albright.David@epa.gov>; Ho, Yenhung <Ho.Yenhung@epa.gov>
Cc: Wayne Rowe <rowe5@slb.com>; Wade Zaluski <WZaluski@slb.com>
Subject: RE: GSDT Notifications for CES Permit App

David and Yenhung,

First, thank you for the call this morning Yenhung, and for taking the time to talk through this a bit.

I spoke again with the team and we believe we can fill in references to the requested information in the "Alt PICS Timeframe Demonstration" module. That is, we will indicate where in the application material we already submitted the requested info/data is presented. I believe we can get this uploaded and submitted today.

The "Pre-Operational Testing" module however would take a bit more effort. The majority of the tabs we can fill in with "0" meaning no wells drilled or data collected yet. However, the first tab, "Welcome," requires two documents:

> "Upload a **proposed pre-operational testing plan** pursuant to 40 CFR 146.82(a)(8) here. Please make sure the most up-to-date version of the plan is uploaded."
>
> "Upload a **proposed pre-operational testing schedule** here. Pursuant to 40 CFR 146.87(f), this schedule must be submitted 30 days prior to conducting the first test, and any schedule changes must be submitted 30 days in advance of the next scheduled test."

So, we would still appreciate your guidance on this module.
As well as information on how to safely transmit a copy of our Project Narrative that includes CBI.

Thanks again,
-Rebecca

Rebecca Hollis
Director Business Development -
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From: Rebecca Hollis
Sent: Thursday, February 13, 2020 10:10 AM
To: Albright, David <Albright.David@epa.gov>
Cc: Ho, Yenhung <Ho.Yenhung@epa.gov>; Wayne Rowe <rowe5@slb.com>; Wade Zaluski <WZaluski@slb.com>
Subject: RE: GSDT Notifications for CES Permit App

Hi again, David,

We reviewed the feedback provided by Molly. Then went back and took a harder look at GS Data Tool modules: Pre-Operational Testing, and Alt PICS Timeframe Demonstration, as well as our application material. The short summary is that we did not submit information through the two modules because we felt at our current stage (Preconstruction) we have not drilled wells or collected the site-specific detail requested. That being said, much of the information is presented (based on computational modeling) throughout other sections of our application. So, if EPA requires these two modules be completed at this phase, we can work to provide as much info as possible at this time.

In our re-review, I did see the check boxes in the Project Information module that I did check for both the Pre-Operational Testing and Alt PICS Timeframe Demonstration modules. So, this was indeed an inconsistency with our application, my mistake, and a good catch by EPA.

To provide more detail on the modules and our reasoning for not submitting them at this time:

> **"Pre-Operational Testing:** this module supports the submission of geologic, hydrogeologic, and well-related data collected during the construction of a new well or during/after conversion of a Class VI well prior to commencing injection pursuant to 40 CFR 146.82(c)."

- This was not submitted because CES is in the Preconstruction Phase. There is no well-related data collected because a well has not been drilled at this time.
- Operational testing schedules are presented in the Attachments submitted under Project Plan Submissions.

> **"Alternative PISC Timeframe Demonstration:** this module is used to submit an alternative PISC timeframe demonstration by owners or operators who opt to make this demonstration pursuant to 40 CFR 146.93(c)."

- As per our evaluation in Section 5 of ATTACHMENT E: POST-INJECTION SITE CARE AND SITE CLOSURE PLAN 40 CFR 146.93(a), This pre-construction application is proposing a ten year post monitoring period following the cessation of injection operations. This alternative post injection site care (PISC) timeframe, pursuant to 40 CFR 146.93(c)(1) is based on the computational modeling to delineate the AoR; predictions of plume migration, pressure decline, and carbon dioxide trapping. Once site-specific (characterization well, 3D seismic, etc.) has been acquired, CES will either complete the alternative post-injection site care plan or modify the monitoring time-frame for the "*Monitoring Above the Confining Zone*" and "*Carbon Dioxide Plume and Pressure Front Tracking*" sections of this attachment.
- Because this conclusion is based on only computational modeling, CES concluded it was not the time to submit this module. The requested items to submit are presented in the submitted Narrative and Attachments A through Attachments H.

Please advise if EPA requires CES to submit these modules at this time.

Thank you again,

-Rebecca

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From: Rebecca Hollis
Sent: Tuesday, February 11, 2020 9:59 AM
To: Albright, David <Albright.David@epa.gov>
Cc: Ho, Yenhung <Ho.Yenhung@epa.gov>
Subject: RE: GSDT Notifications for CES Permit App

Thank you, David.

I will review this with the team and get back to you ASAP.

Thanks again for your assistance in this matter.

Best,
-Rebecca

Rebecca Hollis
Director Business Development -

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From: Albright, David <Albright.David@epa.gov>
Sent: Tuesday, February 11, 2020 9:44 AM
To: Rebecca Hollis <rhollis@cleanenergysystems.com>
Cc: Ho, Yenhung <Ho.Yenhung@epa.gov>
Subject: FW: GSDT Notifications for CES Permit App

Hi Rebecca, below is the text of the message sent to me by Molly McEvoy, per our discussion a moment ago. We can discuss at your convenience.

Thanks, David

Hi David,

The information CES submitted via the GSDT is formally submitted to EPA, but I'm not sure if they are done submitting for this application.

I would expect to see submissions into the Pre-Operational Testing module. They did not submit anything to this module but it's possible they included the information required under 146.82(a)(8) in another module. They also have not submitted data into any of the optional modules (e.g., Alternative PISC Timeframe Demonstration).

I'm looking at their form submissions and it appears CES marked in the Project Information module that they would be submitting data into the Pre-Operational Testing module and Alt PICS Timeframe Demonstration module. I can't tell for sure from their submissions, so it may be necessary to confirm with CES that they are done submitting information to EPA.

I'll work on adding your emails to the email notifications list for this project. Let me know if you need any other help with the GSDT.

Thanks,
Molly