Message

From: Rebecca Hollis [rhollis@cleanenergysystems.com]
Sent: 10/15/2020 7:55:52 PM
To: Ho, Yenhung [Ho.Yenhung@epa.gov]; Albright, David [Albright.David@epa.gov]
CC: Keith Pronske [klpronske@cleanenergysystems.com]; Natalie Nowiski [NNowiski@slb.com]; Shari.Ring@cadmusgroup.com; MaryEllen.Tuccillo@cadmusgroup.com; Vivian Rohrback [VRohrback@slb.com]; Scott Eberhardt [eberhardt4@slb.com]
Subject: RE: EPA's Technical Evaluation Comments and Information Request #2 for CES Class VI permit application

Calvin and team,

Thank you again for taking the time to speak with us yesterday and answering our questions on the EPA's Technical Evaluation Comments and Information Request #2.

As a quick follow up to our discussion, I logged on to the GSDT today to see if I could access the EPA Cost Tool through the site. I searched the Financial Responsibility Demonstration module but did not find a link or way to access the Cost Tool. So, I presume it did not come from the GSDT site.

Thank you again and please let me know if you have any questions.

Best Regards,
-Rebecca

Rebecca Hollis
Director Business Development -

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The Power to Reverse Climate Change

From: Rebecca Hollis
Sent: Monday, October 12, 2020 2:02 PM
To: Ho, Yenhung <Ho.Yenhung@epa.gov>; Albright, David <Albright.David@epa.gov>
Cc: Keith Pronske <klpronske@cleanenergysystems.com>; Natalie Nowiski <NNowiski@slb.com>; Shari.Ring@cadmusgroup.com; MaryEllen.Tuccillo@cadmusgroup.com; Vivian Rohrback <VRohrback@slb.com>; Scott Eberhardt <eberhardt4@slb.com>
Subject: RE: EPA's Technical Evaluation Comments and Information Request #2 for CES Class VI permit application

Thank you, Calvin and team, for agreeing to meet with us this week.

We would like the call to cover EPA's Technical Evaluation Comments and Information Request #2, that discussed the Emergency and Remedial Response (ERR) Plan and Financial Responsibility Demonstration documentation, with a focus on the latter.
We are in receipt of EPA's Technical Evaluation Comments and Information Request #3, however should we need further information or clarification on that material, we propose to set up a separate meeting.

Questions/topics for the meeting this week include:

Re: Enclosure 1 for the ERR

- Given the feedback and requests under "Emergency Identification and Response Actions," CES (working with Schlumberger) plans to complete the requested assessments and update the ERR accordingly. So, we plan to submit a revised ERR with our response letter by 31-Oct-2020. This differs than our response to EPA's Technical Feedback #1 regarding Site Characterization where we responded to each item directly.
- For "Staff Training and Exercise Procedures," EPA requests a copy of CES's site specific standard operating procedures and training program. Could EPA please clarify if this is specific for the CO2 injection well only? Note, the envisioned carbon negative energy plant will be a highly integrated facility, including biomass gasification, syngas processing, power generation, and CO2 capture and storage. As such, a significant portion of procedures/programs are unrelated (directly) to CO2 capture/storage/monitoring/USDW/etc.

Re: Enclosure 2 for FR

- CES did use the EPA's Cost Estimation Tool for Class VI Financial Responsibility Demonstrations (the Cost Tool) to develop our estimates submitted with our permit application.
    - CES understands that EPA developed the Cost Tool to provide an "acceptable range of costs" (including a high-end, middle range, and low-end cost estimate) for Class VI FR activities based on information submitted with a permit application.
    - Can EPA provide more detail or background on how the low, medium, high cost scenarios are calculated, the basis for the calculations, and any indications on the level of accuracy?
- Much like other areas of our application, CES will continue to update information as more data and site-specific details are acquired. CES used the Cost Tool for its initial estimates to develop cost ranges but will be providing updated site-specific estimates for the FR categories. Presently, of most concern to CES is the large range estimated for ERR costs.
    - Also, CES does not anticipate having updated cost estimates for the complete ERR by the requested 31-Oct-2020 response date.
- CES understands that we must demonstration FR for the project (pursuant to 40 CFR 146.85) but would like to discuss the potential difficulties in obtaining such instruments at this stage of the project

Thank you and looking forward to discussing soon,
-Rebecca

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From: Ho, Yenhung <Ho.Yenhung@epa.gov>
Sent: Friday, October 9, 2020 9:03 AM
To: Rebecca Hollis <rhollis@cleanenergysystems.com>
Cc: Albright, David <Albright.David@epa.gov>; Keith Pronske <klpronske@cleanenergysystems.com>; Natalie Nowiski <NNowiski@slb.com>; Shari.Ring@cadmusgroup.com; MaryEllen.Tuccillo@cadmusgroup.com
Subject: RE: EPA's Technical Evaluation Comments and Information Request #2 for CES Class VI permit application

Hi Rebecca,

We are available for a call next Wednesday (10/14), 9:30AM-11:00AM PST. Please send an invite to us (David, Shari Ring and MaryEllen Tuccillo of Cadmus (cc'd), and me) if the time slot works for your team.

Please provide your questions prior to the call.

Best regards,
Calvin

From: Rebecca Hollis <rhollis@cleanenergysystems.com>
Sent: Thursday, October 8, 2020 9:16 AM
To: Ho, Yenhung <Ho.Yenhung@epa.gov>
Cc: Albright, David <Albright.David@epa.gov>; Keith Pronske <klpronske@cleanenergysystems.com>; Natalie Nowiski <NNowiski@slb.com>
Subject: RE: EPA's Technical Evaluation Comments and Information Request #2 for CES Class VI permit application

Hi Calvin, David,

Thank you for the comments on the Emergency and Remedial Response Plan and Financial Responsibility Demonstration submitted with our Class VI UIC permit application. We have reviewed the evaluation and information request and a few questions we would like to go over with you. Do you have some time next week to discuss? I think we could cover it in half hour but in light of Info Request #3, would like to block out an hour for the call as we may have some follow up questions/clarifications on that request as well.

Thank you again and happy Thursday,
-Rebecca

Rebecca Hollis
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From: Ho, Yenhung <Ho.Yenhung@epa.gov>
Sent: Thursday, October 1, 2020 1:04 PM
To: Rebecca Hollis <rhollis@cleanenergysystems.com>
Cc: Albright, David <Albright.David@epa.gov>
Subject: EPA's Technical Evaluation Comments and Information Request #2 for CES Class VI permit application

Hi Rebecca,

We have issued our second technical evaluation comments and information request today via the Information Request module of GSDT. Let us know if you have any questions about the request.

Sincerely,

Calvin Ho
Groundwater Protection Section

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