Message

From: Rebecca Hollis [rhollis@cleanenergysystems.com]
Sent: 1/28/2020 11:38:29 PM
To: McEvoy, Molly [mcevoy.molly@epa.gov]
CC: Wayne Rowe [rowe5@slb.com]; Ho, Yenhung [Ho.Yenhung@epa.gov]; Albright, David [Albright.David@epa.gov]; Wade Zaluski [WZaluski@slb.com]
Subject: RE: (Pre-Application Phase) CES_Quick Update on Class VI permit application
Attachments: EPA_GS Data Tool_AOR Tool Error_screencapture_more info_28jan2020.PNG

Hi Molly,

We are actively working to populate the GS Data Tool with our application material for our CES Mendota project site. This week and last we had no trouble accessing the site however today we received an error when attempting to launch the "Area of Review and Corrective Action" reporting tool. I have attached a screenshot of the error. Is this something you have seen before and/or know of a fix?

The error occurred from multiple computers so I don't believe it is a PC-specific error. Also, other reporting tools launched and functioned no problem, such as the "Project Information Tracking" and "Financial Responsibility Demonstration" tools.

Any advice you could offer would be most appreciated.

Thank you,
-Rebecca

Rebecca Hollis
Director Business Development -

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The Power to Reverse Climate Change

From: Rebecca Hollis
Sent: Tuesday, January 28, 2020 3:27 PM
To: Albright, David <Albright.David@epa.gov>
Cc: Wayne Rowe <rowe5@slb.com>; Ho, Yenhung <Ho.Yenhung@epa.gov>; McEvoy, Molly <mcevoy.molly@epa.gov>
Subject: RE: (Pre-Application Phase) CES_Quick Update on Class VI permit application

Hi David,

Happy Tuesday.

Just wanted to pass along a quick update on our progress.

We believe we have completed all required documentation for the Class VI Pre-Construction Permit application for our Mendota site. We had a management review meeting last week to discuss the application and review relevant details,

and are now actively populating GS Data Tool site. So, you will see our submissions start to come in this week, likely completing early next week… assuming we don't have any trouble with the GS Data Tool site functionality.

Thanks again and let me know if you have any questions,
-Rebecca

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From: Rebecca Hollis
Sent: Monday, January 13, 2020 9:37 AM
To: Albright, David <Albright.David@epa.gov>
Cc: Wayne Rowe <rowe5@slb.com>; Ho, Yenhung <Ho.Yenhung@epa.gov>; McEvoy, Molly <mcevoy.molly@epa.gov>
Subject: RE: (Pre-Application Phase) Clean Energy Systems_Info on EPA Class VI permit application for "BioCCS" projects

Thank you, David, for the prompt reply.

We will work to complete and submit the QASP with the Testing and Monitoring Plan per your guidance. No problem. It just may take us a few extra days to complete the submission ☺

Thanks again and Happy Monday,
-Rebecca

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From: Albright, David <Albright.David@epa.gov>
Sent: Friday, January 10, 2020 8:05 AM
To: Rebecca Hollis <rhollis@cleanenergysystems.com>
Cc: Wayne Rowe <rowe5@slb.com>; Ho, Yenhung <Ho.Yenhung@epa.gov>; McEvoy, Molly <mcevoy.molly@epa.gov>
Subject: RE: (Pre-Application Phase) Clean Energy Systems_Info on EPA Class VI permit application for "BioCCS" projects

Hi Rebecca,

Happy New Year to you as well!

Regarding your question about the QASP, the quality assurance and surveillance plan is a required element of the Testing and Monitoring Plan submitted with the permit application (40 CFR 146.90(k)). However, EPA recognizes that the initial QASP will very likely need to be updated post-construction.

If you have any further questions, please let us know.

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: Thursday, January 9, 2020 4:38 PM
To: Albright, David <Albright.David@epa.gov>; McEvoy, Molly <mcevoy.molly@epa.gov>
Cc: Wayne Rowe <rowe5@slb.com>
Subject: RE: (Pre-Application Phase) Clean Energy Systems_Info on EPA Class VI permit application for "BioCCS" projects

Hello David and Molly,

First, let me wish you a very happy new year! We are looking forward to an exciting and active year for the development and deployment of carbon reducing energy systems.

Thank you again for taking the time to speak with us last month regarding our submission of a Class VI permit application for our Mendota site. We began uploading information to the site that day (20-December) and were able to work out a few computer kinks before the holiday. We are now actively entering and uploading information using the GS Data Tool site. Current estimated completion is the middle of next week.

During our call, we did have a question regarding the Quality Assurance Surveillance Plan (QASP). This document requires a significant amount of detail that we will not fully resolve until we have drilled the well at the site. So, it may not be appropriate to submit the document now, during the Pre-Construction phase. Is this something you can confirm?

Thank you again and I will be sure to keep you apprised of our status.

Please don't hesitate to reach out with any questions in the meantime.

Best Regards,
-Rebecca

Rebecca Hollis
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From: Rebecca Hollis
Sent: Friday, December 20, 2019 9:46 AM
To: Albright, David <Albright.David@epa.gov>
Cc: Wayne Rowe <rowe5@slb.com>
Subject: RE: (Pre-Application Phase) Clean Energy Systems_Info on EPA Class VI permit application for "BioCCS" projects

Great! Thanks, David.

We can use our Conference Line #1:
Dial-in: 800-261-3225
Code: 379-9143

Talk to you soon.

Best,
-Rebecca

Rebecca Hollis
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From: Albright, David <Albright.David@epa.gov>
Sent: Friday, December 20, 2019 9:03 AM
To: Rebecca Hollis <rhollis@cleanenergysystems.com>
Cc: Wayne Rowe <rowe5@slb.com>
Subject: RE: (Pre-Application Phase) Clean Energy Systems_Info on EPA Class VI permit application for "BioCCS" projects

Hi Rebecca, I can do a call at 1pm today. Please let me know if that will work. Thanks, David

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From: Rebecca Hollis <rhollis@cleanenergysystems.com>
Sent: Thursday, December 19, 2019 10:47 PM
To: Albright, David <Albright.David@epa.gov>

Cc: Wayne Rowe <rowe5@slb.com>
Subject: RE: (Pre-Application Phase) Clean Energy Systems_Info on EPA Class VI permit application for "BioCCS" projects

Hello David,

I hope this email finds you well.

Since we last met in October, we have been working diligently toward the submission of a Class VI UIC permit application for our first "BioCCS" project in California. Our partners at Schlumberger have led these efforts, using public and purchased data in the area surrounding the Mendota site, located in Fresno county.

Thank you again for your support in getting us initial access to the EPA GS Data Tool site. We were able to download the necessary forms/templates and have now completed the Narrative and Attachments A through H. We are planning to upload the documents to the site this week but have a few questions and items we would like to run by you first. Do you and your team have some time tomorrow (Friday, 20-Dec) or Monday (23-Dec) to discuss?

We have a few questions on the mechanics of uploading the documents to the EPA site but also would like to review the process approach. As I mentioned, the application documents were prepared using public and purchased pre-existing data from the area immediate surrounding the proposed site. It is our hope and expectation that the documents be reviewed as soon as practicable. Per our discussion, we expect questions, clarifications, and/or additional requests from EPA on the application material, and will work to resolve them as quickly as possible. Once EPA determines the requests are satisfied and deemed suitable, it is my understanding that a pre-permit, or conditional permit, is awarded that will be contingent upon additional site specific data acquired during the Pre-Construction/Pre-Operational Phase(s) of the project. The data should substantiate and validate all key assumptions. The data will then be used to update as necessary the information and analyses provided in the Pre- Construction application.

I'll stop for now but wanted to give you sense of what we'd like to cover on the call. I think it can be short and we can be flexible on a start time. So please just let us know your availability.

Thank you again and best regards,
-Rebecca

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From: Albright, David <Albright.David@epa.gov>
Sent: Thursday, October 3, 2019 10:19 AM
To: Rebecca Hollis <RHollis@CleanEnergySystems.com>
Cc: Wayne Rowe <rowe5@slb.com>
Subject: RE: (Pre-Application Phase) Clean Energy Systems_Info on EPA Class VI permit application for "BioCCS" projects

Sounds great, Rebecca. I look forward to the discussion.

Thanks,

David

David Albright
Manager, Groundwater Protection Section
USEPA Region 9 (WTR-4-2)
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San Francisco, CA 94105
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From: Rebecca Hollis <RHollis@CleanEnergySystems.com>
Sent: Thursday, October 3, 2019 10:11 AM
To: Albright, David <Albright.David@epa.gov>
Cc: Wayne Rowe <rowe5@slb.com>
Subject: RE: (Pre-Application Phase) Clean Energy Systems_Info on EPA Class VI permit application for "BioCCS" projects

Great. Thanks David.

I'll send out a calendar invite for the 17th and set up a WebEx. Feel free to forward to members of your team. I will reserve our conference room starting at 9:30 am but we can be flexible on a start time. I think an hour should be enough time, but will hold the room for a few hours just in case. If there is time after the meeting, we have some hardware in our shop you can take a look at – components from our pressurized oxy-combustors.

Please let me know if you have any questions or need anything in the meantime.

Best Regards,
-Rebecca

Rebecca Hollis
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From: Albright, David [mailto:Albright.David@epa.gov]
Sent: Tuesday, October 01, 2019 4:41 PM
To: Rebecca Hollis
Subject: RE: (Pre-Application Phase) Clean Energy Systems_Info on EPA Class VI permit application for "BioCCS" projects

That sounds good. I can meet at 9:30/10am on Oct 17th. If possible, it would be nice to conference in a couple of my staff. Thanks, David

David Albright
Manager, Groundwater Protection Section

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From: Rebecca Hollis <RHollis@CleanEnergySystems.com>
Sent: Monday, September 30, 2019 3:43 PM
To: Albright, David <Albright.David@epa.gov>; Wayne Rowe <rowe5@slb.com>
Cc: Basinger, David <Basinger.David@epa.gov>; Coffman, Joel <Coffman.Joel@epa.gov>; Dermer, Michele <Dermer.Michele@epa.gov>; Ho, Yenhung <Ho.Yenhung@epa.gov>; Rumrill, Nancy <Rumrill.Nancy@epa.gov>
Subject: RE: (Pre-Application Phase) Clean Energy Systems_Info on EPA Class VI permit application for "BioCCS" projects

Hi David,

I spoke with Wayne today and we like the idea of meeting in Sacramento on Thursday, 17-Oct, before your afternoon meeting with the state. We can meet at our CES' offices in Rancho Cordova, just east of Sacramento; only about a 20-30 minute drive from downtown depending on traffic.
Otherwise, we plan to meet with the national labs earlier in the week (LBNL and LLNL) so could do a meeting at your SF office – say on the 16th of October – if that would work better for you and the team.

Let us know your thoughts.

Thanks again,
-Rebecca

Rebecca Hollis
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From: Rebecca Hollis
Sent: Friday, September 27, 2019 10:06 AM
To: 'Albright, David'; Wayne Rowe
Cc: Basinger, David; Coffman, Joel; Dermer, Michele; Ho, Yenhung; Rumrill, Nancy
Subject: RE: (Pre-Application Phase) Clean Energy Systems_Info on EPA Class VI permit application for "BioCCS" projects

Hi David,

Thank you for the prompt response. You are correct. I did receive a bounce back from George's email address.

No problem waiting until the week of 7-Oct (or later) for an update meeting. Let me double check with Wayne – as he may be traveling to California in mid-October – and get to you with a few proposed dates.

Thank you again and looking forward to speaking again soon.

Kind Regards,
-Rebecca

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From: Albright, David [mailto:Albright.David@epa.gov]
Sent: Wednesday, September 25, 2019 3:09 PM
To: Rebecca Hollis; Wayne Rowe
Cc: Basinger, David; Coffman, Joel; Dermer, Michele; Ho, Yenhung; Rumrill, Nancy
Subject: RE: (Pre-Application Phase) Clean Energy Systems_Info on EPA Class VI permit application for "BioCCS" projects

Hi Rebecca,
Thanks for the email message. You may have gotten a return email reflecting that George Robin has left EPA. He retired in March of this year.

As for a meeting, we could probably not do anything before the week of Oct 7th. Alternatively, I will be in Sacramento on Oct 17th for an afternoon meeting with the state, so we could arrange something for that morning (and patch in my staff by phone or webinar). Let me know your preference.

Thanks,
David

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From: Rebecca Hollis <RHollis@CleanEnergySystems.com>
Sent: Wednesday, September 25, 2019 2:37 PM
To: Robin, George (Separated 3/4/19) <Robin.George@epa.gov>; Wayne Rowe <rowe5@slb.com>
Cc: Albright, David <Albright.David@epa.gov>; R9-Deep <R9Deep@epa.gov>
Subject: RE: (Pre-Application Phase) Clean Energy Systems_Info on EPA Class VI permit application for "BioCCS" projects

Hello George,

I hope this email finds you well.

It has been some time since we last spoke about our (Clean Energy Systems') "BioCCS" plants and plans to deploy them in California. It turns out it takes longer to raise funds than we had planned. So unfortunately the project was stalled for several months until we secured the necessary resources.

The good news is we have received initial development funding and have formally kicked off activities to deploy our first Carbon Negative Energy plant in California. We are also in the process of securing additional sites that will allow us to take advantage of economies of scale in subsequent deployments. Note the plants are replicable and scalable, and will initially be deployed on a retrofit basis, making use of existing idled facilities. This is briefly summarized in the attached presentation – very similar to the deck I sent last fall.

We are also happy to announce Schlumberger has officially joined our development team and will be supporting activities associated with CO2 storage. This includes everything from preliminary site screening to developing EPA Class VI injection permit materials. They have been involved with other Class VI wells in the United States so we have high confidence in the team and for the projects in general.

Wayne Rowe, who you may already know, is leading the Schlumberger team. I wanted to introduce you to Wayne, copied here, and potentially set up a meeting in the coming weeks. I would like to update you and the EPA staff on our CCS deployment efforts and plans (as they have changed slightly since last year) as well as give Wayne a chance to introduce himself and discuss Class VI permitting activities in more detail, and of course, some Q&A. Is this something you would be able to support? If so, could you please let us know some days/times that work for you. Since we are located near Sacramento, I would be happy to travel down to your offices in San Francisco for an in person visit – potentially in early October.

Thank you again for your time and consideration. We are all excited to finally be moving on these projects and are looking forward to supporting carbon removal across the state!

Best Regards,
-Rebecca

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From: Robin, George [mailto:Robin.George@epa.gov]
Sent: Thursday, October 25, 2018 2:32 PM
To: Rebecca Hollis
Cc: Joshua Perron; Keith Pronske; Robin, George; Albright, David; R9-Deep
Subject: RE: (Pre-Application Phase) Clean Energy Systems_Info on EPA Class VI permit application for "BioCCS" projects

Hi Rebecca,

Yes, I remember discussing with Jean.

We are looking over your presentation and will also provide you with dates of availability for conference calling.

In the meantime, please consider becoming familiar with the material at the following sites during this Pre-Application Phase:

- Final Class VI Guidance Documents
  https://www.epa.gov/uic/final-class-vi-guidance-documents

- GS Data Tool Registration Form
  https://epa.velo.pnnl.gov/share/res/Registration_Form.pdf

Sincerely,
George

George Robin (robin.george@epa.gov)
Engineer, Underground Injection Control

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