Message

From: Shari Ring [Shari.Ring@cadmusgroup.com]
Sent: 11/20/2020 12:00:45 PM
To: Ho, Yenhung [Ho.Yenhung@epa.gov]
Subject: RE: [EXT] FW: CES_Couple Quick Questions, Next Steps and Timing

Hi Calvin,

I think their approach is acceptable, although it may be easier for them to just update the T&M plan (but it's their call). If they say they plan to update something, I'd suggest they be very specific so that the updates they eventually submit reflect a common understanding.

We can talk about timing and process on the call today. For example, we are finding that some of their responses to the site characterization questions are a little vague, although we feel they do have information to answer the questions.

Let me know if you need anything before the call.

From: Ho, Yenhung <Ho.Yenhung@epa.gov>
Sent: Thursday, November 19, 2020 5:40 PM
To: Shari Ring <Shari.Ring@cadmusgroup.com>
Subject: [EXT] FW: CES_Couple Quick Questions, Next Steps and Timing

Hi Shari, FYI and see my below initial thoughts (IN CAPS) to CES's questions regarding next steps and timing for their application review.

From: Rebecca Hollis <rhollis@cleanenergysystems.com>
Sent: Thursday, November 19, 2020 1:41 PM
To: Ho, Yenhung <Ho.Yenhung@epa.gov>
Cc: Albright, David <Albright.David@epa.gov>; Natalie Nowiski <NNowiski@slb.com>; Vivian Rohrback <VRohrback@slb.com>; Keith Pronske <klpronske@cleanenergysystems.com>
Subject: CES_Couple Quick Questions, Next Steps and Timing

Hi Calvin,

I hope all is well. Its hard to believe that the Thanksgiving holiday is next week and before we know it, 2021 will be here!

Wanted to reach out with a few quick questions regarding our Class VI permit application, the current response we are working on, the next steps and estimated timing.

First, we are working on our responses to EPA's latest Technical Evaluation Comments and Information Request. It is our understanding that this is the fourth and final request from EPA's review of our permit application submitted in February. Based upon the feedback, there will be updates required to several of our permit documents. However, we are continuing to operate under the assumption that we should wait to update and resubmit these documents, e.g. Narrative, Attachments, etc., until after EPA has completed its review and requests said updates. To be more specific, our response to EPA Info Request number #4 will indicate the updates to be made to various documents/Attachments but will not include the updated document itself in our response. Once EPA is satisfied with all of our responses/plans, we will update all necessary documents and resubmit as one package. Do you agree this approach? – I THINK THIS APPROACH SHOULD WORK (SHARI- LET US KNOW IF YOU THINK CES SHOULD STILL UPDATE THE DOCUMENTS AND INCLUDE THEM IN RESPONSE #4).

Which leads to our next questions, when do you believe EPA will be prepared to provide feedback to our Responses (#1, #2, #3 and #4)? Also, will feedback be in the form of additional information requests? Or perhaps meetings or working sessions, etc.?
THESE QUESTIONS ARE IN TIME FOR PART OF OUR KICKOFF CALL DISCUSSION TOMORROW.

As an update on our end, we are on track to meet the 4-December target for responding to information request #4. We are also working on updated information for our Financial Responsibility Demonstration will have additional information to EPA by year end (hopefully sooner).

Finally, any additional information you could provide on estimated timing will help us with resource planning, as well as support other areas of the project such as securing financing for the next phase(s). For example, do you feel we are on track for a draft Authorization to Construct permit, and if so, do you have a sense of when this may occur? I understand it is a moving target and there are still several items that are still TBD. Obviously, the EPA permit is a key milestone for our project development and will lead to management decisions and releases. So, we are just trying to get a sense to support our project planning.

I am happy to jump on a call to discuss.

Thank you again for your time and consideration.

Best Regards,
-Rebecca

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The Power to Reverse Climate Change

-----Original Message-----
From: GS Data Tool <velo-epa@epa.velo.pnnl.gov>
Sent: Wednesday, October 28, 2020 9:53 AM
To: Rebecca Hollis <rhollis@cleanenergysystems.com>
Subject: Class VI UIC Notification: Information Request

PLEASE DO NOT REPLY TO THIS EMAIL--REPLIES WILL NOT BE SEEN!

This is a notification of a new or updated Information Request made by your Class VI UIC permitting authority. Attached is a read-only copy of the Information Request including links to download files containing the detailed request.

This is a system-generated notification. Please do not reply to this email. To comply with the Class VI Rule, use the Information Request module on the GS Data Tool operator landing page to reply to the request.

If you have further questions or comments, please contact the UIC Program Director responsible for your project.

This Information Request was made on Oct 28, 2020 at 12:52 PM Eastern Daylight Time

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