Department of Resource Management
675 Texas Street, Suite 5500
Fairfield, California 94533
www.solanocounty.com

Planning Services Division
(707) 784-6765 Fax (707) 784-4805

Mike Yankovich
Program Manager

March 17, 2010

DaMonica Pierson
Sr. Technical Advisor
Shell Exploration and Production
Upstream Americas CO2/CCS
150 N. Dairy Ashford
Houston, TX 77079

Subject: U-09-3 Northern California CO_2 Reduction Project - Incomplete

Dear Ms. Pierson:

On February 19, 2010, this department received a noise analysis, revised site plan/grading plan, a Vulnerability Evaluation Framework Review and a cost estimate for your Use Permit application U-09-13 for a Class V injection well for carbon dioxide sequestration on property located at 6378 Montezuma Hills Road (APN: 0090-090-280).

As required by section 65943 of the Government Code, you are hereby advised that the referenced application has been reviewed and found to be incomplete. In order to complete your application, the following information shall be submitted.

1) A preliminary seismic study, as outlined in the attached memo from the Environmental Health Division, dated September 21, 2009, and as further clarified at our meeting on November 13, 2009.

2) A qualitative risk assessment pursuant to EPA's Vulnerability Evaluation Framework (VEF) for carbon dioxide sequestration prepared by an independent geologist licensed to practice in the State of California. This document shall be a technical report separate from the Initial Study. In addition, include supporting facts/statements to support the conclusions.

3) Evaluation of the noise generated from the drill compressor and impacts to the residences.

4) The submitted noise analysis evaluates the decibel levels at trucks travelling at 40 mph. Because the speed limit is unposted and truck drivers may drive at 55

mph, please revise the noise analysis to include the decibel levels at 55 mph as well.

5) The submitted cost estimate covers the costs for construction of the pad and well. Please submit a cost estimate for closure and restoration of the site, along with a timeline for completion of this process (assuming the commercial project does not go forward).

6) Submit an expanded detail plan of Figure K-1 of the Class V Underground Injection Control Permit Application and Technical Report to include the anti-blowout protection equipment as recommended in our memo to you dated September 21, 2009. The blowout protection equipment shall be designed consistent with Section 3219 of the California Laws for Conservation of Petroleum & Gas.

7) Submit a detailed explanation as to the reasons why the subject site is an optimal location for geologic CO2 sequestration and any alternative sites that were considered.

Your application will be held as incomplete pending receipt of the information requested above. Your prompt response will greatly facilitate our department's processing of your application. During the course of consideration of the application, it may be necessary to ask you to clarify or provide additional information. We will contact you if this becomes necessary. Once the application has been deemed complete, we will determine the appropriate level of environmental review for the proposed development. If you have any questions, please do not hesitate to call me at (707) 784-3170.

Sincerely,

Nedzlene Ferrario
Senior Planner

Cc: Dana Dean
835 First Street
Benicia, CA 94510

Fritts Golden
Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104