August 16, 2021

Rajinder Sahota Division Chief, Industrial Strategies Division

California Air Resources Board

1001 I St.

Sacramento CA 95814

RE: **Comments on** **Public Workshop:  2022 Scoping Plan Update – Engineered Carbon Removal Technical Workshop**

Dear Ms. Sahota,

Clean Energy Systems, Inc. (CES) thanks you and the staff at the California Air Resources Board (CARB) for the opportunity to comment on the recent technical workshop on engineered carbon removal as part of the 2022 Scoping Plan update.

CES has developed proprietary oxy-combustion technologies that lend to efficient and cost-effective carbon capture. As you are likely aware, CES is in the process of developing a Bioenergy CCS (BECCS) project in Mendota, CA.

This BECCS project is expected to remove about ~300,000 tons of carbon dioxide (CO2) per year. The plant will use agricultural waste biomass, like almond trees, to produce a renewable synthesis gas that will be mixed with oxygen in a combustor to generate electricity. More than 99% of the carbon from the BECCS power-generating process will be captured for safe, permanent storage by injecting carbon dioxide (CO2) underground into nearby deep geologic formations. Importantly, and relative to the discussion at the Technical Workshop, CES’s technology is designed to operate without routine emissions of nitrous oxide, carbon monoxide and particulates from combustion produced by conventional biomass plants.

By using biomass fuel that consumes CO2 over its lifetime to produce power, and then by safely and permanently storing the produced CO2 generated during power generation, the process is designed to result in net-negative carbon emissions. The completed facility will help improve air quality in the Central Valley by using approximately 200,000 tons of agricultural waste annually, in line with the recent California Air Resources Control Board plan to begin phasing out almost all agricultural burning in the Valley by 2025. Additionally, the Mendota project has the potential to create up to 300 jobs during construction and about 30 permanent jobs once the facility is operating.

We have been engaged with CARB staff over the years and greatly appreciate the consistent support for projects like ours that help California achieve its very aggressive climate goals and path to a clean energy future. We look forward to working with you to ensure the deployment of projects that achieve carbon reduction goals, improve local air quality and provide clean energy jobs in our rural communities.

Sincerely,

Keith Pronske, CEO

Clean Energy Systems