Future and Current Water Treatment Technology

Cost to purify water to human standards?
✓ ✓ transport to users?

The Aquifer - is continuous and unbroken w/ adjacent fields which are exempt.

Endangered Species Considerations further contribute to the unlikely chance of any civic development or facility to supply such a development.

* Field Boundary Change
* Remote location - not reasonably expected to be a domestic water source
  - not economically or practically feasible.
* Exemption from RWQCB
* Connect DM's memo to CFR 40 § 146.04

Memo to Mike:

1. Location
2. Consensus of opinion

} We feel that...

3. RWQCB effort
4. Answer his questions posted in the reply memo

5. Note that the State Director has the authority and discretion to make potential use determination.
6. Why is Tulare non-productive here?
7. Zone water quality needs to be established
8. Ask for clarification of EPA's role as a concurrance role or a decision role
9. This is a case where the "checklist" does not strictly apply. "We" would have no doubt as to our defensible position.

1. Remote location - will not be used as source for human consumption. The expense to build the facilities, treat the water, and transport it to a point of use would be prohibitive. Ironically, it is likely that should any public use be contemplated, the permitting agencies would most likely balk, due to the proximity of "contaminated" reservoirs. Unlike other cases, there is no seperation of stratigraphy, structure, or great distance.

Field Boundary Revisions -

generally, may be initiated by the Dist. Deputy. Should consult w/ HQ befor approving significant or controversial changes.

NOTE: Local jurisdictions may use DOG admin boundaries.

Field: common accumulation controlled by a distinct or seperate stratigraphic or structural feature.

Aquifer - (May exempt all or part) a geo. fm. / grp of fms / part of a fm capable of yielding significant amount of water to a well or spring

Public Water System - Piped water for human consumption. Min requirements: 15 connections or aver 20 individuals daily for at least 60 days / yr. (~ 200 gals / day)

Exemption Criteria 40 CFR Sec. 146.04

OK 1. Does not now serve as drinking wtr source

and 2. Can't & will not ... because

No a. hydrocarbon producing / expected to be commercially prod.

OK b. location makes use impractical (State Dir. discretion)

No c. contaminated

No or d. location over Class III well mining op

or

OK 3. TDS 3,000 - 10,000 and not reasonably expected to supply a public water system

Timetable - Primary States - State Dir reviews and approves/disapproves. Regional EPA concurs.

After appl. deemed complete by State Dir, ~~the~~ Regional has 60 days to approve/disapprove. RWT a 3,000 - 10,000 TDS aquifer the Region has 45 days from date of receipt. If no action w/in 45 days, request is deemed approved.

MEMO MS to DM 3/23/94

* Application submitted to EPA for concurrance, not approval - EPA Reg. 1X Aquifer Exemption Guidance 3/93.

* Not reasonably expected to serve as a supply to a public water system.
* Situated in a location that would make recovery technically or economically impracticle to use

* What is Sect. 146.4 of CFR40?

NE/4 Sec 26-30S, 22E

Producers:

~~Zone~~:

351	Olig (idle)	305	Olig (idle)
361	St.	374	St. (idle)
352	St.	304	St.
362	St. (idle)	584	1st Carneros
353	St.		
363	St.		
373	St. (idle)		
383	St.		
354	St.		
364	St. (idle)		

WD's:

~~ST~~ (ABD)

381	St. (idle)	WF
391x	St. (idle)	WF
3-72WD	Olig.	
3-82WD	Olig	