To: Keener, Bill[Keener.Bill@epa.gov]; Mogharabi, Nahal[MOGHARABI.NAHAL@EPA.GOV]
Cc: Albright, David[Albright.David@epa.gov]
From: Montgomery, Michael
Sent: Wed 7/2/2014 11:29:16 PM
Subject: RE: revised Desk statement on California UIC order

great

From: Keener, Bill
Sent: Wednesday, July 02, 2014 4:28 PM
To: Montgomery, Michael; Mogharabi, Nahal
Cc: Albright, David
Subject: RE: revised Desk statement on California UIC order

Ok, and Kelly and I will be sending this to our comms contact, Ed Wilson at Dept. of Conservaiton.

Bill Keener

Office of Public Affairs

U.S. EPA - Region 9

San Francisco, CA

Phone: (415) 972-3940

From: Montgomery, Michael
Sent: Wednesday, July 02, 2014 4:24 PM
To: Keener, Bill; Mogharabi, Nahal
Cc: Albright, David
Subject: FW: revised Desk statement on California UIC order

Thanks Bill –

I discussed it with Jane and we are going to send this to DOGGR. We have not heard anything re the orders. Just FYI

Mike

From: Keener, Bill
Sent: Wednesday, July 02, 2014 2:16 PM
To: Diamond, Jane; Mogharabi, Nahal
Cc: Maier, Brent; Montgomery, Michael; Albright, David; Quast, Sylvia; Woo, Nancy; Zito, Kelly
Subject: RE: revised Desk statement on California UIC order

Folks, here's a revised desk statement, after incorporating comments from Alexis, Peter Gravatt and Travis Loop, and David's help in clarifying what these injection wells are being used for:

In March 1983, U.S. EPA granted regulatory authority to the State of California's Division of Oil & Gas (now Division of Oil, Gas & Geothermal Resources, or DOGGR) for certain types of wells (Class II) that are used primarily to inject steam or water for enhanced oil/gas recovery, or to inject waste water (such as brines) from oil and gas production. As part of EPA's regulatory oversight, EPA approves the use of groundwater aquifers where these wells could be used, typically in areas in or near oil and gas production activity where groundwater quality is very poor. These aquifers are "exempted" from the protection provided for drinking water sources by the federal Safe Drinking Water Act and therefore can be used safely for enhanced oil/gas recovery and disposal of related fluids. Higher quality aquifers that could serve as a potential source of drinking water are not exempt, and should not receive Class II oil and gas related injection fluids.

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This week DOGGR issued orders to cease injections into aquifers that have not been exempted by EPA. DOGGR is evaluating potential risks to drinking water sources from the injection wells at these facilities. EPA will oversee a broader review of DOGGR's program to ensure wells have been appropriately authorized to inject within the boundaries approved by EPA. Meanwhile, EPA Region 9 is working cooperatively with the staff at DOGGR, as well the State's Drinking Water Program to protect human health and the environment.

Bill Keener

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