To: Rao, Kate[Rao.kate@epa.gov]
From: Albright, David
Sent: Fri 10/2/2015 3:54:07 PM
Subject: FW: DOGGR

Hi Kate, I wasn't sure where this was headed, so I responded directly to Jared. Just wanted you to be aware of the response. Thanks, David

From: Albright, David
Sent: Friday, October 02, 2015 7:46 AM
To: Blumenfeld, Jared
Cc: Montgomery, Michael; Zito, Kelly; Keener, Bill; Gullatt, Kristin
Subject: FW: DOGGR

Hi Jared,

I'm responding to your questions, conveyed by Bill, regarding the Cypress report. In short, the answer is no, DOGGR did not misrepresent its progress on the UIC Compliance plan to EPA. The Cypress report evaluated historic UIC implementation (prior to 1978 through 2013) in the Cypress District. The report has some similar findings to our 2010 program review, but also identifies issues from the 2011-2013 period, which was not covered in our review.

Mike is out today, but is planning to provide additional detail to you early next week, in advance of our scheduled UIC update on Thursday. Finally, I should note that we were provided a heads-up copy of the Cypress report and it has not been officially released by DOGGR, pending final authorization from the Governor's office.

Let me know if you have other questions.

Thanks,
David

From: Keener, Bill
Sent: Thursday, October 01, 2015 5:19 PM
To: Albright, David
Cc: Rao, Kate; Montgomery, Michael; Zito, Kelly

Subject: RE: DOGGR

Thanks for this David. We spoke to Jared about it late today, and he had 2 questions for you re: the Cypress report:

1. Did DOGGR misrepresent its progress to the EPA?

2. If they did, then why weren't we able to catch that through our QA/QC process?

Bill Keener

Office of Public Affairs

U.S. EPA - Region 9

San Francisco, CA

Phone: (415) 972-3940

From: Albright, David
Sent: Thursday, October 01, 2015 12:08 PM
To: Keener, Bill
Cc: Rao, Kate; Montgomery, Michael
Subject: DOGGR

Hi Bill,

I wanted to give you a heads-up that DOGGR will soon be issuing a report to the legislature (tentatively, next week on Oct 8) that includes the results of an internal audit they conducted on UIC operations in their Cypress District (So. California). The Cypress report is likely to result in more negative attention to DOGGR's implementation of the UIC program and further questions to EPA about these issues, including whether/how their findings impact the existing Compliance Plan.

Mike has asked that we develop a desk statement and some Qs and As, which we are now starting to work on, but we also wanted you to be aware of the situation.

In addition, we are starting to work on a desk statement regarding the upcoming Oct 15th state deadline for injection wells to shut-in (disposal wells in sub-3,000 ppm TDS aquifers). We expect to have the final list from the state as early as tomorrow. There is a WTR Div weekly item on this topic.

Feel free to call if you have any questions.

Thanks,
David

David Albright | Drinking Water Protection Section | EPA Region 9 San Francisco | 415 972-3971