To: Johnson, KarenD[Johnson.KarenD@epa.gov]; Minter, Douglas[Minter.Douglas@epa.gov]; Dellinger, Philip[dellinger.philip@epa.gov]; Platt, Steve[Platt.Steve@epa.gov]
From: Albright, David
Sent: Thur 10/9/2014 6:50:43 PM
Subject: RE: Data for Class II aquifer exemptions

Thanks Karen. Good to know.

From: Johnson, KarenD
Sent: Thursday, October 09, 2014 11:31 AM
To: Albright, David; Minter, Douglas; Dellinger, Philip; Platt, Steve
Subject: RE: Data for Class II aquifer exemptions

David- we have not had any AE since the beginning of the program. So afraid we don't have any experience to share.

From: Albright, David
Sent: Thursday, October 09, 2014 10:54 AM
To: Minter, Douglas; Dellinger, Philip; Platt, Steve; Johnson, KarenD
Subject: Data for Class II aquifer exemptions

We are having a lot of conversations with the State of CA about the type and format of information/analysis/data required to be submitted for a Class II aquifer exemption – mostly for EOR and disposal in 3,000-10,000 ppm TDS formations. HQs checklist is a useful guidepost of what needs to be analyzed, but I'm curious whether you all have any particular guidance or experience to share for actual Class II AEs that you have approved. What did the state submit? How heavily do you rely on the state's review/analysis of information developed by the oil/gas operator vs. EPA's own independent analysis? Do you adhere to the 45-day regulatory deadline for approval? I know you have all dealt with highly complex AE issues, but here I am more interested in the more straightforward, routine Class II exemptions (assuming these exist). Feel free to give me a call if that would be more efficient.

Thanks,
David

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