Ex. 5 - Deliberative Process

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In Table 1. Non-Hydrocarbon Producing Zones being used for Waste Water Disposal it lists for the Midway-Sunset Field, Alluvium (Holocene Age) with thickness of 125'-252' extending throughout the field…

In the sheet for the **Midway-Sunset Field, the Tulare Formation of Pleistocene age is listed as an Oil Producing Zone** with Average net thickness of 50' – 200' with an average depth of 200' – 1,400'.

FYI, I have attached a scan of those DOGGR Primacy Sheets…

Ex. 5 - Deliberative Process

From: Coffman, Joel
Sent: Monday, April 04, 2016 11:21 AM
To: Dermer, Michele <Dermer.Michele@epa.gov>
Subject: RE: Howard E. Caywood, Inc waste discharge requirements

And this paragraph (below) if from this one…

http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/kern/r5-2002-0194.pdf

WASTE DISCHARGE REQUIREMENTS ORDER NO. R5-2002-0194

PETRO RESOURCES, INC.

SP–SECTION 29 LEASE

MIDW

AY-SUNSET OIL FIELD

KERN COUNTY

17. Pursuant to 40 Code of Federal Regulations (CFR), Section 146.4, the Tulare Formation in the

Midway-Sunset Oil Field has been exempted by the U.S. EPA for the purpose of underground injection of non-hazardous fluids associated with the production of hydrocarbons. Permitting of Class II injection wells used for the subsurface injection of produced oilfield wastewater is conducted by the California State Division of Oil, Gas & Geothermal Resources.

From: Coffman, Joel
Sent: Monday, April 04, 2016 10:40 AM
To: Dermer, Michele <Dermer.Michele@epa.gov>
Subject: RE: Howard E. Caywood, Inc waste discharge requirements

This paragraph (below) is from this one…

http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/kern/r5-2004-0058.pdf

17. Pursuant to 40 Code of Federal Regulation (40 CFR), Section 146.4, the Tulare Formation in the Asphalto Oil Field has been exempted by the U.S. EPA for the purpose of underground injection of non-hazardous fluids associated with the production of hydrocarbons. The California State Division of Oil, Gas & Geothermal Resources is the permitting authority for Class II injection wells used for the subsurface injection of produced oilfield wastewater.

Ex. 5 - Deliberative Process

Ex. 5 - Deliberative Process

Ex. 5 - Deliberative Process

Ex. 5 - Deliberative Process

Ex. 5 - Deliberative Process

From: Dermer, Michele
Sent: Monday, March 28, 2016 1:05 PM
To: Coffman, Joel <Coffman.Joel@epa.gov>
Cc: Albright, David <Albright.David@epa.gov>
Subject: FW: Howard E. Caywood, Inc waste discharge requirements

Not sure why this ended up in my clutter mailbox but here is the information on the quoted WDR from the Midway Sunset field you mentioned. It's regulating ponds so not really sure why Sunrise included this in their application.

From: Rodgers, Clay@Waterboards [mailto:Clay.Rodgers@waterboards.ca.gov]
Sent: Wednesday, March 23, 2016 3:57 PM
To: Dermer, Michele <Dermer.Michele@epa.gov>
Subject: Howard E. Caywood, Inc waste discharge requirements

Michele:

The WDRs you asked about today are for surface discharges and not injection wells. I have copied part of the first page of the WDRs and provided that below.

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

CENTRAL VALLEY REGION

ORDER NO. R5-2005-0163

WASTE DISCHARGE REQUIREMENTS

FOR

HOWARD E. CAYWOOD, INC.

SECTION 19 & 24 LEASES

MIDWAY-SUNSET OIL FIELD

KERN COUNTY

The California Regional Water Quality Control Board, Central Valley Region, (hereafter Regional

Board) finds that:

1. Howard E. Caywood, Inc. (hereafter Discharger), is a California corporation that owns and

operates crude oil production wells at the leases designated as “Section 19” and “Section 24” in

the Midway Valley Area of Midway-Sunset Oil Field.

2. The Discharger operates six unlined surface impoundments, generally known in the industry as

sumps, at the Section 19 and Section 24 Leases. Approximately 611 barrels/day (25,662

gallons/day) of produced wastewater is discharged to the sumps for disposal by solar evaporation

and percolation.

3. The wastewater disposal operation is currently not regulated by Waste Discharge Requirements

(WDRs). WDRs are being issued to assure compliance with current State regulations and

Regional Board policies and guidelines.

I can provide the complete WDRs if you wish and they are on our webpage under adopted orders and searching the order number. Let me know if you have any questions or need additional information. I already have staff researching the question of what WDRs we have for injection wells in the Central Valley Region. I should have that answered by Friday.

Clay L. Rodgers

Assistant Executive Officer

Central Valley Water Board

1685 E Street

Fresno, CA

(559) 445-5102