CALIFORNIA
Water Boards

EDMUND G. BROWN JR.
GOVERNOR

MATTHEW RODRIQUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

State Water Resources Control Board

FEB 11 2015

Steven R. Bohlen, State Oil & Gas Supervisor
Department of Conservation
Division of Oil, Gas & Geothermal Resources
801 K Street, MS 18-05
Sacramento, CA 95814-3530
steven.bohlen@conservation.ca.gov

Dear Mr. Bohlen:

COMMENTS ON THE OCCIDENTAL OF ELK HILLS, INC. TULARE AQUIFER EXEMPTION DOCUMENT, ELKS HILLS FIELD

State Water Resources Control Board staff, in consultation with the Central Valley Regional Water Quality Control Board staff (collectively Water Boards), have reviewed the Occidental of Elk Hills, Inc., Tulare Aquifer Exemption Document, Elk Hills Field (Exemption Request), dated September 14, 2014. The Exemption Request, forwarded to Water Board staff on October 24, 2014, proposes an aquifer exemption for the entire saturated upper Tulare zone and both the unsaturated and saturated lower Tulare zone below the Amnicola claystone within an area of approximately 59 square miles, or about 80 percent of the Elk Hills field (See Attachment 1).

Based on the information provided, Water Boards staff concur with the Exemption Request only for the following areas: All of Sections 32R and 33R in Township 30S, Range 23E; and 1B, 2B, 3B, 4B, 10B, 11B, 12B, and 13B in Township 31S, Range 23E (See Attachment 2). However, this determination will be reevaluated if future information becomes available.

State Water Boards staff do not concur with the Exemption Request for the remaining areas at this time in part due to the lack of a sufficient demonstration that the injection fluid will be confined to the intended zone or zones of injection. As a result, additional information is recommended for the remaining portions of the Exemption Request (See Attachment 3).

If you have any questions regarding this matter, please contact Mr. John Borkovich at (916) 341-5779 or john.borkovich@waterboards.ca.gov.

Sincerely,

Jonathan Bishop
Chief Deputy Director

Attachments (3)

cc: [Via email]

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Clay Rodgers, Assistant Executive Officer
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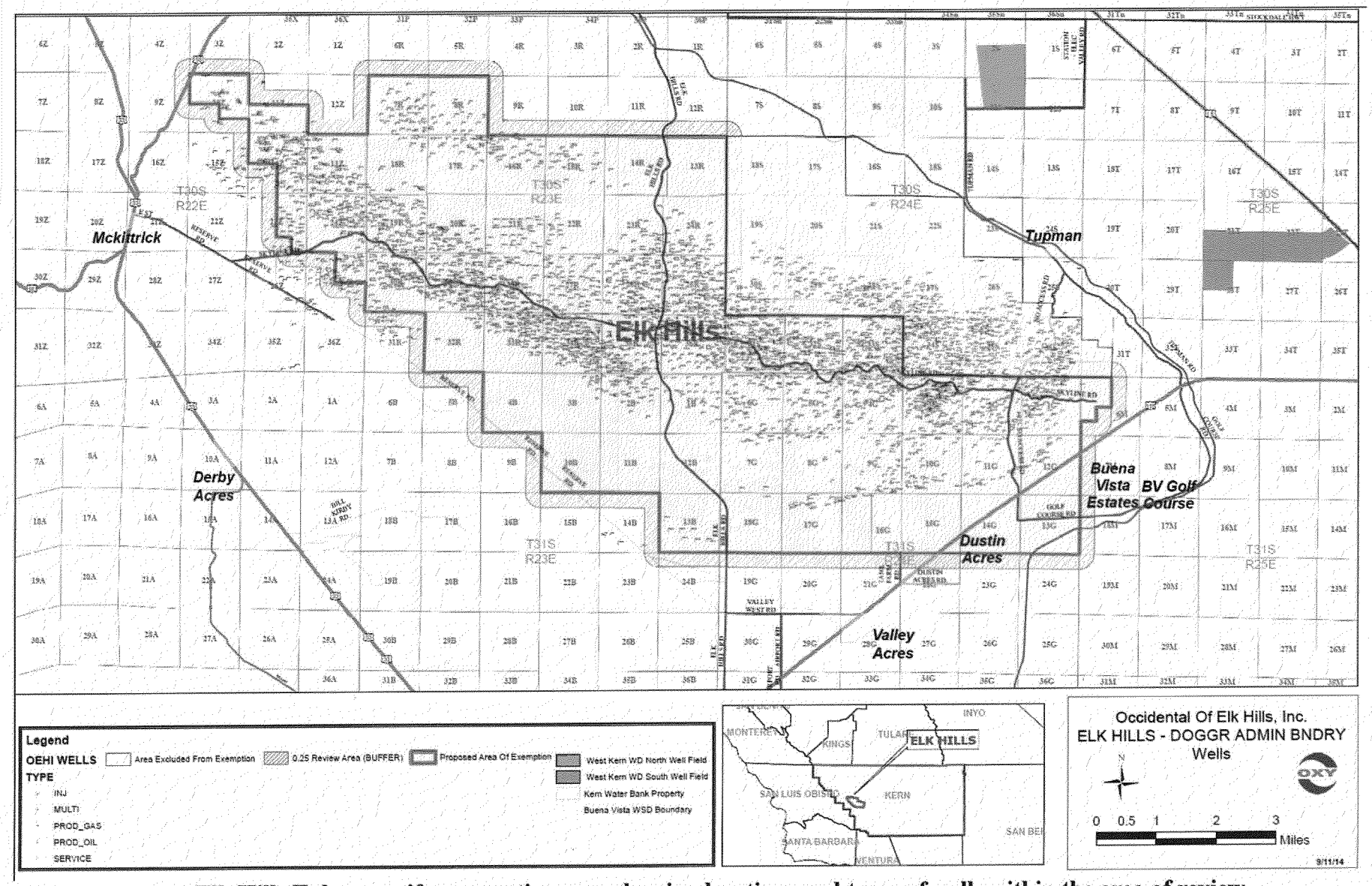
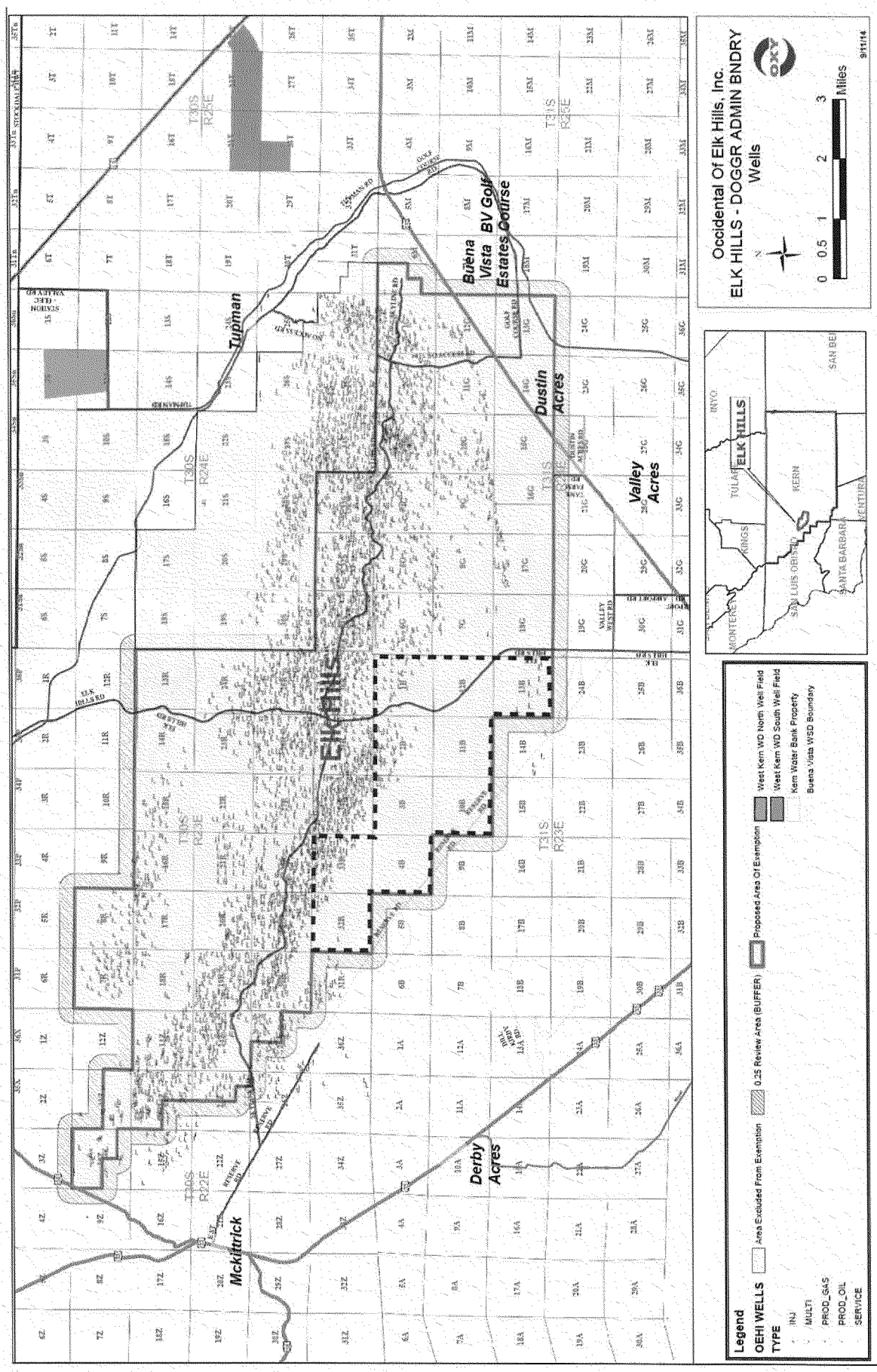
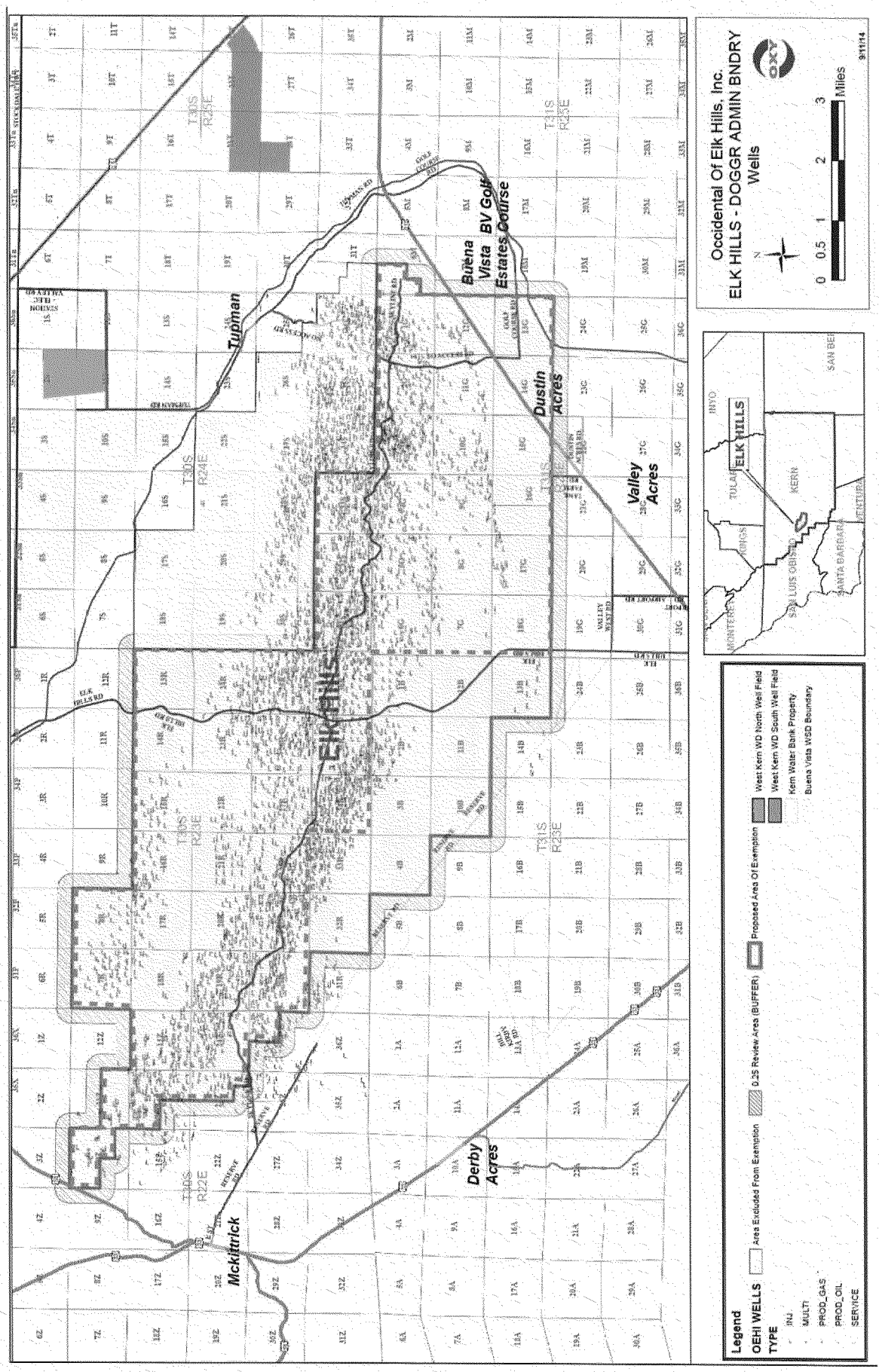


Elk Hills Tulare aquifer exemption area showing locations and types of wells within the area of review



Elk Hills Tulare aquifer exemption area showing locations and types of wells within the area of review

*Water Boards staff concur with the Exemption Request for all of Sections 32R, and 33R in Township 30S, Range 23E; and 1B, 2B, 3B, 4B, 10B, 11B, 12B, and 13B in Township 31S, Range 23E.



Elk Hills Tulare aquifer exemption area showing locations and types of wells within the area of review

*Additional information is required for the remaining portions of the Exemption Request.