To: Albright, David[Albright.David@epa.gov]; Dermer, Michele[Dermer.Michele@epa.gov]
Cc: Rao, Kate[Rao.kate@epa.gov]
From: Coffman, Joel
Sent: Fri 2/26/2016 8:41:09 PM
Subject: Draft Sunrise Technical Comments Response
Ltr to Sunrise Power Plant - 4MAR2016 Comments on Tech Review jc.doc
Comments on NRG responses-Amended permit renewal application_21Jan2016.docx

Perhaps we can discuss this next week sometime. To sum it up. We are requesting Sunrise to prepare an AE package to inject Class I NH injectate into the Tulare Formation of the Midway-Sunset based - not on any injection they have already done, but the fact well logs in the AOR have shown there is fresh water in the upper Tulare zone all along. Some of the language needs to be looked at. I make reference to the acknowledged confusion on the status of any AE for this zone and also mention that due to this confusion and the lack of any AE for the Tulare in the Midway-Sunset – that CDOGGR is also in the process of preparing an AE package for Class II injection into that zone, as one does not currently exist.

There are other technical issues, but that is the main one.

Joel

I am also attaching Jim's comments.