To: Rodgers, Clay@Waterboards[Clay.Rodgers@waterboards.ca.gov]
From: Dermer, Michele
Sent: Mon 3/28/2016 11:51:52 PM
Subject: RE: Howard E. Caywood, Inc waste discharge requirements

Right, so can you do the same analysis for these wells under the WDR? Are we sure there is not a problem with any drinking water supplies in vicinity of Alon or San Joaquin or is that what you are confirming with the "no" at the first part of your sentence? I just want to make sure we have our facts correct.

From: Rodgers, Clay@Waterboards [mailto:Clay.Rodgers@waterboards.ca.gov]
Sent: Monday, March 28, 2016 4:37 PM
To: Dermer, Michele <Dermer.Michele@epa.gov>
Subject: RE: Howard E. Caywood, Inc waste discharge requirements

No, and I confirmed with State Board. State Board did those analyses and they only looked at the Class II wells under DOGGR jurisdiction. Other classes of injection wells would not be in that group.

Clay

From: Dermer, Michele [mailto:Dermer.Michele@epa.gov]
Sent: Monday, March 28, 2016 4:31 PM
To: Rodgers, Clay@Waterboards
Subject: RE: Howard E. Caywood, Inc waste discharge requirements

Hi Clay,

Thanks for the confirmation.

The second part of our inquiry was to establish that there is not an threat or risk to drinking water in the vicinity of these injection wells. As we discussed, the Water Board evaluated all the Class

II injection wells with respect to their screened interval and proximity to drinking water in order to identify any that posed a threat so they could focus on these while working through aquifer exemption applications. With regard to Alon and San Joaquin Refinery, these would not necessarily been subject to that same screening by the Water Board because they are not permitted by DOGGR as Class II wells, rather they are subject to WDRs. But the question is the same, was there any kind of risk screening done on the drinking water wells in the vicinity of the two facilities? Thanks!

Michele

From: Rodgers, Clay@Waterboards [mailto:Clay.Rodgers@waterboards.ca.gov]
Sent: Monday, March 28, 2016 4:26 PM
To: Dermer, Michele <Dermer.Michele@epa.gov>
Subject: RE: Howard E. Caywood, Inc waste discharge requirements

Michele:

It appears that we have no other WDRs (other than San Joaquin and Alon refineries) for injection of oil field wastes. We have 4 facilities doing aquifer storage and recovery of potable water under a general order for ASR adopted a couple of years ago. We also have a few facilities that are injecting something related to a clean-up project for in-situ remediation. I am not aware of any other industrial facilities where we have WDRs for regulated injection wells.

Let me know if you have any questions or need additional information.

From: Dermer, Michele [mailto:Dermer.Michele@epa.gov]
Sent: Monday, March 28, 2016 1:03 PM
To: Rodgers, Clay@Waterboards
Subject: RE: Howard E. Caywood, Inc waste discharge requirements

Thanks Clay. Also, still interested in whether there are any drinking water wells in proximity to the San Joaquin or Alon Refinery injection wells.

Sincerely, Michele

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