To: Gross, Warren@Waterboards[Warren.Gross@waterboards.ca.gov]
Cc: Albright, David[Albright.David@epa.gov]
From: Dermer, Michele
Sent: Mon 12/1/2014 8:34:07 PM
Subject: RE: Fruitvale Oilfield, Santa Margarita formation, Injection well "WD-1" operated by San Joaquin Refining Co., API 030-03015

Hi Warren,

I do not know anything about the San Joaquin Refinery well. What is being injected?

As far as whether there are any other injection wells regulated by the Regional Board, we are combing our database right now to see what is reflected in our records.

As you know Alon's application for a permit was deficient; you were copied on the letter.

Regards, Michele

From: Gross, Warren@Waterboards [mailto:Warren.Gross@waterboards.ca.gov]
Sent: Monday, December 01, 2014 11:27 AM
To: Dermer, Michele
Subject: FW: Fruitvale Oilfield, Santa Margarita formation, Injection well "WD-1" operated by San Joaquin Refining Co., API 030-03015

Hi Michelle,

I would like to be able to tell Jerry whether the Regional Board will continue to regulate the subject injection well or US EPA will take over under a new permit. Do you have any plans to issue a permit for the San Joaquin refinery injection well currently permitted under our WDR Order 91-132? Aside from the Alon well, for which you are in process on the new EPA permit, I think this may be the last injection well under our purview.

Warren

Warren W. Gross, PG, CEG, CHG
Senior Engineering Geologist
Central Valley Water Board, Fresno
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From: Salera, Jerry@DOC
Sent: Wednesday, November 26, 2014 9:14 AM
To: Gross, Warren@Waterboards
Cc: Wass, Lonnie@Waterboards; Rodgers, Clay@Waterboards; Michele Dermer (Dermer.Michele@epa.gov); Habel, Rob@DOC
Subject: RE: Fruitvale Oilfield, Santa Margarita formation

Hi Warren,

Thanks for this information. Does the RWQCB have an MOU with the EPA regarding regulation of Class V (or Class I) wells? I understand that the RWQCB also regulate the other well, the "WI-1", operated by Alon Bakersfield Property Inc.

Jerry

From: Gross, Warren@Waterboards
Sent: Tuesday, November 25, 2014 6:06 PM
To: Salera, Jerry@DOC
Cc: Wass, Lonnie@Waterboards; Rodgers, Clay@Waterboards; MIchelle Dermer

(Dermer.Michele@epa.gov)
Subject: RE: Fruitvale Oilfield, Santa Margarita formation

Jerry.

We regulate this injection well under Waste Discharge Requirements Order 91-132 (WDRs). The WDRs indicate a Santa Margarita formation TDS of 5,783 mg/L, based on Sept 1987 – May 1988 sample data. A 2001 Technical Summary Report for Well WD-1 shows an injection interval within the zone from 4,020' – 4,225' (4020'-4040', 4100'-4120', 4130'-4140', 4150'-4175', 4190'-4200', 4215'-4225')

The WDRs limit the TDS of their injectate to 2,500 mg/L. They rarely exceed 1,000 mg/L, as reported in their weekly sampling.

The full analytical of the Santa Margarita contained in our WDRs is attached (Page 4 of the partial copy of the WDRs).

The well location you show on your map is consistent with our information for WD-1.

Let me know if you need anything further. I'm out of the office tomorrow.

Warren W. Gross, PG, CEG, CHG
Senior Engineering Geologist
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From: Salera, Jerry@DOC
Sent: Tuesday, November 25, 2014 8:47 AM
To: Gross, Warren@Waterboards
Cc: Habel, Rob@DOC; Michele Dermer (Dermer.Michele@epa.gov); Rodgers, Clay@Waterboards
Subject: FW: Fruitvale Oilfield, Santa Margarita formation

Hi Warren,

I would like to inquire about the disposal well "WD-1" operated by San Joaquin Refining Co., API 030-03015. Is the RWQCB regulating this well? Do you have information about its injection zone and the injection zone TDS?

We would like to have this information to help us review an injection application in the same vicinity as this well. Any information would be appreciated – thank you.

Jerry Salera

Underground Injection Control (UIC) Program

CA Division of Oil, Gas and Geothermal Resources

801 K Street, MS 20-20

Sacramento, CA 95814

Tel: 916-323-1781

Fax: 916-323-0424

Jerry.Salera@conservation.ca.gov

From: Dermer, Michele [mailto:Dermer.Michele@epa.gov]
Sent: Monday, November 24, 2014 2:37 PM
To: Salera, Jerry@DOC
Cc: Albright, David; Robin, George; Habel, Rob@DOC; Gross, Warren@Waterboards; Greenberg, Leslie
Subject: RE: Fruitvale Oilfield, Santa Margarita formation

Hi Jerry,

Thank you for following up. We have no information on the San Joaquin Refining Company well you are describing. It is not in our database; we believe it is regulated by the Regional Board. I would also point out that the information we have regarding the injection formation information for the Alon well (W1-1) is different from the information you have. The Regional Board should be able to clarify.

Sincerely,

Michele

From: Salera, Jerry@DOC [mailto:Jerry.Salera@conservation.ca.gov]
Sent: Monday, November 24, 2014 10:09 AM
To: Dermer, Michele
Cc: Albright, David; Robin, George; Habel, Rob@DOC; Gross, Warren@Waterboards
Subject: RE: Fruitvale Oilfield, Santa Margarita formation

Hi Michele,

Thank you for your reply and the information on the Alon well. Our information show that this Class I well, "WI" 1, operated by Alon Bakersfield Property Inc., is an active WD well injecting into the Chanac/Lower Kernco formation/zone.

My subject of my inquiry is another well further to the NW of the Alon well. This well is shown in our records as a disposal well for refinery wastes and operated by San Joaquin Refining Company, Inc. Our database shows this as an active EPA Class V well injecting into the Chanac/Santa Margarita formations. The map from our public Well Finder site shows the 2 wells, with the Alon well indicated by a red arrow.

Do you have any information about the perf depths of the San Joaquin Refinery well and the TDS of the injection zone?

Thanks for any information.

Jerry

From: Dermer, Michele [mailto:Dermer.Michele@epa.gov]
Sent: Friday, November 21, 2014 5:12 PM
To: Salera, Jerry@DOC
Cc: Albright, David; Robin, George; Habel, Rob@DOC; Gross, Warren@Waterboards
Subject: Re: Fruitvale Oilfield, Santa Margarita formation

Hi Jerry,

I think you may be referring to a Class V well that is presently regulated by the Regional Water Quality Control Board under WDR 91-102. The operator is Alon. The RWQCB contact person is Warren Gross, I am copying him on this note. You can contact him for the most current information regarding the injection zone and associated TDS.

EPA does not have any more recent chemical analysis information, the operator sends monitoring reports to the Regional Board as required by the order.

I am also attaching a copy of a letter that we sent out in today's mail to Alon. We can certainly discuss your findings regarding the exempt status of the proposed injection formation for the the Class II disposal you've received.

Sincerely,

Michele

From: Salera, Jerry@DOC <Jerry.Salera@conservation.ca.gov>
Sent: Tuesday, November 18, 2014 1:16 PM

To: Dermer, Michele
Cc: Albright, David; Robin, George; Habel, Rob@DOC
Subject: Fruitvale Oilfield, Santa Margarita formation

Hi Michele,

We have received an application for a water disposal injection project in the vicinity of your Class V well "WD-1", API 030-03015 operated by San Joaquin Refining Company. The proposed wells are going to be located in Sections 14 & 23, T29S/R27E MD B&M, and will inject into the Santa Margarita formation. Based on information that we have, this portion of the Santa Margarita is non-hydrocarbon producing, but inside the "shaded area" in our Vol. I data sheets. The Santa Margarita is identified as a hydrocarbon producing formation/zone in the Main area of the Fruitvale oilfield.

We would like to request information on your Class V well as to injection zone and injection zone TDS. I believe that this well is injecting into the Santa Margarita based on well information we have, however, we don't know if this is the latest information. We would also appreciate if you can provide us information about the fluid chemical analysis of the injection zone of the Class V well. The application that we received provides a fluid chemical analysis of the Santa Margarita from the hydrocarbon producing area in Section 22 and has a TDS of 3,600 mg/L.

Thanks and regards,

Jerry Salera

Underground Injection Control (UIC) Program

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Jerry.Salera@conservation.ca.gov