To: Diamond, Jane[Diamond.Jane@epa.gov]
Cc: Perry, Dale[Perry.Dale@epa.gov]; Richardson, Elena[Richardson.Elena@epa.gov]
From: Hanley, Mary
Sent: Fri 3/6/2015 8:16:18 PM
Subject: Re: Summary of EPA's oversight of California's oil and gas UIC program--for March 9 Bi-Weekly HF Status Meeting

Jane,
Would you send a copy of the draft response letter please so Elena can include that in Stan's materials? Thanks
Mary

From: Diamond, Jane
Sent: Friday, March 6, 2015 1:21:37 PM
To: Meiburg, Stan; Hanley, Mary; Grevatt, Peter; Kopocis, Ken
Cc: Montgomery, Michael; Albright, David; Blumenfeld, Jared; Kao, Jessica; Strauss, Alexis
Subject: Summary of EPA's oversight of California's oil and gas UIC program--for March 9 Bi-Weekly HF Status Meeting

Below is a summary of Region 9's recent activities to oversee California's SDWA Class II oil and gas UIC primacy program. We will call into the March 9 Bi-Weekly HF Status Meeting for the Deputy Administrator to provide an overview and answer any questions.

The state of California was delegated primary responsibility for implementing the Class II oil and gas underground injection control (UIC) program of the federal Safe Drinking Water Act (SDWA) in 1983. As a part of its oversight role, EPA audited California's Department of Conservation, Division of Oil, Gas and Geothermal Resources (DOGGR) Class II UIC primacy program in 2011 and identified substantial implementation deficiencies. In 2012, EPA conducted a review of aquifer exemptions that raised questions about the alignment of injection wells with EPA-approved exemption boundaries.

On July 17 and December 22, 2014, EPA sent letters to DOGGR and the Water Resources Control Board (Water Board) (collectively, the state) highlighting concerns, providing direction and requesting information about DOGGR's implementation of its underground injection control program for oil and gas-related Class II wells. EPA's letters responded to DOGGR's lack of progress in addressing these issues over the prior two years.

EPA has been meeting regularly for the past year with senior officials with the Department of Conservation, DOGGR, the Water Board and the Central Valley Regional Water Board to discuss the state's implementation of the Class II UIC program, the identification of Class II injection wells that may be injecting into non-exempt aquifers, the state's ongoing assessment of drinking water sources that may be impacted by improper injection, and to establish an effective process for reviewing and approving aquifer exemptions in California. EPA's December 22 letter directed the state to submit a Program Revision Plan by February 6, 2015, providing for full compliance with the SDWA by February 2017.

EPA received a copy of the state's Program Revision Plan on February 6, 2015 and has been discussing the Plan with State officials over the past several weeks. We are targeting a response letter back to the State on March 9, four weeks following the State's submittal and in advance of a State Senate oversight hearing on March 10th. EPA's response letter includes

required activities and deliverables, with target milestones and compliance deadlines. The signed letter will be sent to the State, posted on our web site, provided to reporters who have been following this story, and sent to the State Senate in response to their request for EPA participation in the hearing, which the Regional Administrator declined.