To: Strauss, Alexis[Strauss.Alexis@epa.gov]
Cc: Blumenfeld, Jared[BLUMENFELD.JARED@EPA.GOV]; Quast, Sylvia[Quast.Sylvia@epa.gov]; Diamond, Jane[Diamond.Jane@epa.gov]; Liane Randolph (liane.randolph@resources.ca.gov)[liane.randolph@resources.ca.gov]; Ken Alex[Ken.Alex@GOV.CA.GOV]; Steven.Bohlen@conservation.ca.gov[Steven.Bohlen@conservation.ca.gov]; Bishop, Jonathan@Waterboards (Jonathan.Bishop@waterboards.ca.gov)[Jonathan.Bishop@waterboards.ca.gov]; Wyels, Philip@Waterboards[Philip.Wyels@waterboards.ca.gov]; Mark Nechodom (mark.nechodom@conservation.ca.gov)[mark.nechodom@conservation.ca.gov]; Rodriquez, Matthew@EPA (Matthew.Rodriquez@calepa.ca.gov)[Matthew.Rodriquez@calepa.ca.gov]
From: Cliff Rechtschaffen
Sent: Wed 6/25/2014 4:53:58 PM
Subject: RE: Injection

Alexis

I am keeping distribution list here and discussion to a minimum b/c I think we will do better discussing in person or on the phone rather than by email. Your approach actually is pretty similar to what we are contemplating in our orders from DOGGR & the Water Board, which require the operators to gather data & conduct sampling (although at this point we are focused on the first 107 wells & not a larger universe). I think this will become clearer when we walk you through what we are proposing. I will call you later this morning or early afternoon when we have a better sense of our timing

From: Strauss, Alexis [mailto:Strauss.Alexis@epa.gov]
Sent: Wednesday, June 25, 2014 8:54 AM
To: Cliff Rechtschaffen
Cc: Blumenfeld, Jared; Quast, Sylvia; Diamond, Jane
Subject: Injection

Dear Cliff,

Desk: 415 972 3572

Mobile: Ex. 6 - Personal Privacy

Home: Ex. 6 - Personal Privacy

I would like to suggest an approach Jared and I have discussed for your consideration: how best to use the State's compliance action to shift the burden to the well operators, rather than the current emphasis on data-gathering which falls to DOGGR, Water Boards, etc. By shifting the work burden to the operators, the State can focus on direction, oversight, and communications. Just as a straw proposal, the compliance action might

a. Require the operators to cease injection within a 24-hour period, ie a safe and orderly shutdown of injection, not their overall operation, for the known 107 wells.

b. Require the operators to, of their own accord, consider ceasing injection in the larger universe (of up to 1,000 wells) which in their best judgement, may be discharging to non-exempt aquifer strata. This would be a precautionary step they could take to reduce their exposure while gathering more data.

c. Require the operators to submit well logs and other info (which DOGGR is now seeking in its own files) which presumably were submitted in their original permit applications/renewals, and to conduct subsurface data gathering needed by the State (in lieu of the State gathering the data, put a reasonably quick deadline on the operators, who can marshall far greater tech/sci/engineering resources than can the State or EPA).

d. Require the operators to stand ready to perform additional drinking water sampling and analyses (of those constituents not typically monitored in the regulated systems) to include the unique components of the injected fluids as deemed necessary by the State;

e. Require the operators to work together to prepare a map of their wells, area of influence, etc for State review and post material on a common website accessible to the public.

In essence, all the work with the State is now laboriously doing, well by well, can't readily be sustained in a universe of 100 to 1,000 individual wells, so better the State direct the work its needs doing than do it in-house. I suggest the working group (of operators, State, and EPA) may want to reach out to key other parties, such as WSPA and the drinking water association for CA.

Cliff, I am a few years out-of-date in the UIC program, so this is necessarily an arms-length proposal, rather than informed by the day-to-day realities and long-term engagement DOGGR has had with the operators. Call anytime,

Alexis

Alexis Strauss

Deputy Regional Administrator

E.P.A. Region 9

75 Hawthorne Street

San Francisco, CA 94105

415-972-3572

From: Cliff Rechtschaffen [mailto:Cliff.Rechtschaffen@GOV.CA.GOV]
Sent: Wednesday, June 25, 2014 8:24 AM
To: Strauss, Alexis

Subject: Phone number

Hi Alexis: So that I can quickly get ahold of you today if necessary, what is your phone number & Cell number? Thanks, Cliff