To: Mogharabi, Nahal[MOGHARABI.NAHAL@EPA.GOV]
Cc: Zito, Kelly[ZITO.KELLY@EPA.GOV]; Johnson, AudreyL[Johnson.AudreyL@epa.gov]
From: Montgomery, Michael
Sent: Thur 8/21/2014 3:05:01 PM
Subject: FW: Latest article from the Bakersfield Californian

Nahal –

Great job handling this real time yesterday. Thanks!

Mike

From: Moffatt, Brett
Sent: Wednesday, August 20, 2014 11:34 PM
To: Albright, David; Montgomery, Michael; Busterud, Gretchen; Engelman, Alexa; Dermer, Michele
Subject: Latest article from the Bakersfield Californian

The DOGGR well spreadsheet is linked to the article.

State outlines plan to improve injection well oversight

BY JOHN COX Californian staff writer jcox@bakersfield.com

A preliminary state assessment has identified problems with the way California reviews oil field disposal wells, and determined its regulators may lack adequate training, accountability and proper qualifications.

The early findings, outlined in a draft "work plan" the state's top oil regulator sent Monday to the U.S. Environmental Protection Agency, suggest senior California officials agree with federal concerns that much more should be done to protect groundwater from possible contamination by oil field activity.

•□□□□□□□□ **List of 532 wells identified as injecting waste into aquifers that do not produce oil or gas. (Source: California Division of Oil, Gas and Geothermal Resources)**

As the EPA requested last month, the head of California's Division of Oil, Gas and Geothermal Resources, Steven Bohlen, also sent the federal government a list of 532 wells identified as injecting waste material into aquifers that do not produce oil or gas. About three-quarters of them are in Kern County.

A majority of the 532 wells were listed as having injected waste into aquifers that have concentrations of dissolved solids, such as salt, that would qualify them as protected under the federal Safe Drinking Water Act. However, other criteria for protection may apply, including federal aquifer exemptions and the wells' proximity to water wells. All the wells listed were approved for injection work by state regulators.

DOGGR provided the work plan and the list of injection wells but declined to make anyone at the agency available to discuss them.

An email from an EPA spokeswoman said the agency is reviewing the materials from DOGGR as it awaits further information due in mid-October. She gave no indication what the federal government might do with the information.

"The EPA will determine next steps once all requested information has been received," spokeswoman Nahal Mogharabi wrote.

Last month the EPA ordered the state to turn over various information as part of the federal agency's growing scrutiny of California's management of oil field injection wells. The agency's focus was apparently sparked by a 2011 federal audit that alleged numerous deficiencies within California's oversight of what are known as Class II Underground Injection Control wells.

A byproduct of this effort was last month's emergency shutdown of 12 Kern County injection wells, two of which have since been allowed to reopen. The wells' owners are now testing and analyzing the wells or looking for years-old documents that may exempt their injection operations from the Safe Drinking Water Act.

State officials have said they have found no indication any California injection wells have contaminated protected groundwater.

Oil industry representatives contend many of the wells inject produced water, the saline solution that typically comes up along with oil, back into the same aquifer it came from.

Bohlen's eight-page draft work plan outlines a number of steps for addressing concerns about California injection well program. These include developing new regulations dealing with well construction standards, aquifer exemptions and limiting injection pressure to avoid fracturing underground rock formations.

"These regulations may be quite extensive and will take some time to fully develop," the plan states. "In addition, many of the areas covered by these regulations will be controversial and require considerable discussion with all stakeholders."

Bohlen's plan makes repeated mention of problems related to DOGGR staff -- more so than any previous public communications from the agency.

The plan says the division's staffing may need to be increased, realigned, and given additional support and training. It also suggests the need for new hiring standards and greater accountability.

An environmental group that has been scrutinizing California's injection program was pleased to

see DOGGR responding to problems the EPA raised years ago.

Andrew Grinberg, oil and gas program manager at the Washington, D.C.-based environmental activist nonprofit Clean Water Action, said the group is particularly interested in seeing DOGGR reform the aquifer exemption process.

California's water situation has changed greatly since many exemptions were granted by the EPA in the 1980s, he noted.

"We encourage DOGGR and we are glad to see they're interested in taking a look at that," he said.

http://www.bakersfieldcalifornian.com/business/kern-gusher/x1278613017/State-outlines-plan-to-improve-injection-well-oversight