Message

From: Bromley, Eugene [Bromley.Eugene@epa.gov]
Sent: 7/8/2020 3:42:25 PM
To: Bromley, Eugene [Bromley.Eugene@epa.gov]
Subject: FW: New NPDES permit

From: Jay Rao <JRao@dcorllc.com>
Sent: Wednesday, June 10, 2020 8:36 PM
To: Bromley, Eugene <Bromley.Eugene@epa.gov>
Subject: RE: New NPDES permit

Yes, it has been working, although we have an ongoing issues with injection systems and cost associated with its maintenance. However, the whole scenario will, in all likelihood, change once we start drilling new wells and redrilling the old ones. Our geologists anticipate huge increase in produced water volume. Whatever volume I provided , is anticipated. If you have any further questions, please let me know.

Best regards.

Jay

Sent via the Samsung Galaxy Note10+, an AT&T 5G Evolution capable smartphone

-------- Original message --------
From: "Bromley, Eugene" <Bromley.Eugene@epa.gov>
Date: 6/10/20 4:50 PM (GMT-08:00)
To: Jay Rao <JRao@dcorllc.com>
Subject: RE: New NPDES permit

Thanks Jay,

A year or two ago, it looked like Platforms A and B would be shifting to total (or nearly total) reinjection of produced water.

Did that just not work out?

Eugene Bromley
NPDES Permits Section (WTR-2-3)
EPA Region 9
75 Hawthorne Street
San Francisco, CA 94105
bromley.eugene@epa.gov
(415) 972-3510
(415) 947-3549 (fax)

From: Jay Rao <JRao@dcorllc.com>
Sent: Tuesday, June 9, 2020 9:38 AM
To: Bromley, Eugene <Bromley.Eugene@epa.gov>
Subject: RE: New NPDES permit

Dear Mr. Eugene Bromley,
Good Morning. Please see below for a requested increase in maximum annual produced water discharge volume:

1. Platform A: From 13,140,000 BBLs to 25,000,000 BBls/Year
2. Platform B: From 16,425,000 to 25,000,000 BBls/Year
3. Platform Hillhouse: From 7,300,000 to 15,000,000 BBLs/Year

Justification: In near future, DCOR intends to drill more well on aforementioned platforms; and hence, this will, in turn, produce more produced water and oil.

If you need anything further, please let me know.

Best Regards
Jay

From: Bromley, Eugene <Bromley.Eugene@epa.gov>
Sent: Monday, June 8, 2020 10:16 AM
To: Jay Rao <JRao@dcorllc.com>
Subject: RE: New NPDES permit

Jay,

Regarding your questions:

1. Reissuance of the permit? – maybe later this year.
2. Increased produced water discharge volume? – send me an email with the request including revised volume and justification for the need.

Eugene Bromley
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From: Jay Rao <JRao@dcorllc.com>
Sent: Friday, June 5, 2020 5:13 PM
To: Bromley, Eugene <Bromley.Eugene@epa.gov>
Subject: New NPDES permit

Dear Mr. Eugene Bromley,

Good afternoon. Trust this finds you and your family very safe and healthy amid this unprecedented pandemic. FYI, as you wanted, we just finished installation of two sampling points at Platform Edith - one each for deck drain and commingled produced water. On Monday, I will send a formal report to you all. Meanwhile, I have two questions for you:

1. When the new NPDES permit is likely to be issued
2. If we ever decide to request you to increase the Max. Annual Allowable Produced Water Discharge Volume, then what is the protocol to be followed.

Have a great weekend,

Best regards,

Jay

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