Message

From: Weiss, Michael [weiss.michael@epa.gov]
Sent: 4/3/2020 10:31:37 PM
To: Jay Rao [JRao@dcorllc.com]
CC: Howell, Adam [Howell.Adam@epa.gov]; Magnan, Eric [Magnan.Eric@epa.gov]
Subject: RE: Follow-up to Platform Edith Inspection
Attachments: COVID-19 Implications for EPA's Enforcement and Compliance Assurance Program (March 26, 2020).pdf

Hi Jay,
We appreciate and note your response. The attached memo issued by Susan Bodine of EPA's Office of Enforcement and Compliance Assurance explains how EPA will address noncompliance and what permittees/respondents need to do to report and mitigate noncompliance. This memo is not a no action assurance for future enforcement actions. The memo notes that regulated entities should make every effort to comply with their environmental compliance obligations and we will use enforcement discretion on a case-by-case basis. Permittees should follow the instructions in the memo, applicable permits, and effective enforcement orders to notify EPA if compliance is not reasonably practicable due to COVID-19.

Also to clarify, does this mean that Platform Edith is shutdown and not currently operating or discharging? What about other DCOR Platforms?
Thanks again and stay safe,
Mike

From: Jay Rao <JRao@dcorllc.com>
Sent: Thursday, April 02, 2020 10:42 AM
To: Weiss, Michael <weiss.michael@epa.gov>
Subject: RE: Follow-up to Platform Edith Inspection

HI Mike,
Yes, we are all doing fine, and hope the same with you as well. Thanks for asking. To come to your point, I am afraid, I don't have any update as far as installing a new sampling point is concerned. I wanted to get it done 2 weeks ago under my supervision, but because of the current situation, we are not allowed to go offshore. Only essential personnel are allowed. This restriction may remain in force until the end of this month. As soon as we are allowed, this is the first thing on my priority list. Please be patient, it will be done.
Thank you.
Jay

From: Weiss, Michael <weiss.michael@epa.gov>
Sent: Wednesday, April 1, 2020 4:56 PM
To: Jay Rao <JRao@dcorllc.com>
Cc: Magnan, Eric <Magnan.Eric@epa.gov>; Howell, Adam <Howell.Adam@epa.gov>
Subject: RE: Follow-up to Platform Edith Inspection

Hi Jay,
Hope all is well. I was wondering if you had an update on what DCOR is considering for sampling the commingled deck drainage and produced water?
Thanks and stay safe,
Mike

From: Jay Rao <JRao@dcorllc.com>
Sent: Sunday, March 01, 2020 8:31 PM

To: WEISS, MICHAEL <weiss.michael@epa.gov>
Subject: Re: Follow-up to Platform Edith Inspection

Hi Mike,
Sorry for the delay in my response. Yes, Wednesday (3/4) 4-5PM will work for me. Please go ahead and send me the invite.
Goodnight
Jay

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

From: WEISS, MICHAEL <weiss.michael@epa.gov>
Sent: Wednesday, February 26, 2020, 3:47 PM
To: Jay Rao
Subject: RE: Follow-up to Platform Edith Inspection

Hi Jay,
Just had a meeting with Eugene and my manager Eric Magnan to figure out the best option(s) for sampling commingled Deck Drainage. We decided we would like to setup a call with Eric, Eugene, Adam, myself, you, and whoever else from DCOR that you think should participate early next week.

Are you available Tuesday 3/4 from 3-5pm or Wednesday 3/5 from 9-10 am or 4-5pm?
Let me know if those times work and I will send out a meeting invite.
Thanks again,
Mike

From: Jay Rao <JRao@dcorllc.com>
Sent: Friday, February 21, 2020 4:32 PM
To: WEISS, MICHAEL <weiss.michael@epa.gov>
Subject: RE: Follow-up to Platform Edith Inspection

Yes, Mike. He is one of our production engineers; and his name is Dale Bradley. His email address is dbradley@dcorllc.com.
Have a great weekend.
Best.
Jay

From: WEISS, MICHAEL <weiss.michael@epa.gov>
Sent: Friday, February 21, 2020 4:26 PM
To: Jay Rao <JRao@dcorllc.com>
Subject: RE: Follow-up to Platform Edith Inspection

Can you also send along the information for the other person who was on the call? Missed his name.
Thanks,
Mike

From: WEISS, MICHAEL
Sent: Friday, February 21, 2020 4:24 PM
To: Jay Rao <JRao@dcorllc.com>

Cc: Howell, Adam <Howell.Adam@epa.gov>; bcook@dcorllc.com
Subject: Follow-up to Platform Edith Inspection

Hi Jay,
Thanks again for taking the time to discuss some of the findings from the Platform Edith inspection in September 2019 (attached). We clarified the schematic discussed in response to area of concern 2, the interpretation of commingled from the permit, the reporting and sampling of the deck drainage discharge, and the reporting of the well treatment/workover fluid discharges.

Regarding the deck drainage, it appears that it commingles with the produced water, post sampling and before being jointly discharged via tank 11. Part II.D.2, Deck Drainage Commingled
Waste Streams, of the Permit, states "If Deck Drainage is commingled with Produced Water, then effluent limitations and monitoring requirements for Deck Drainage do not apply. Effluent limitations and monitoring requirements for Produced Water apply." I will discuss this with Eugene where the best point for sampling might be and what else might need to be considered going forward.

Regarding the well treatment/workover fluid discharges, since the well treatment fluids are injected into the formations, it is difficult to estimate the exact volume of the amount that is eventually discharged (commingled with the treated produced water). I will discuss with Eugene and see what is the best way to report well treatment discharges.
Let me know if you have any questions and I will reach out to you soon.
Thanks,
Mike

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