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FRESNO, CALIF

Telephone (661)327-1122  
Fax (661)327-2844  
twladd@AOL.com

**Tetra Oil Company**

**GeoPlus Consulting Services**  
1400 Easton Drive - Suite 152  
Bakersfield, CA 93309

December 15, 2015      Certified Mail: 7014 3490 0001 3514 4985  
Mr. Ronald Holcomb  
Central Valley Regional Water Quality Control Board  
1685 E. Street  
Fresno, CA 93706

Re: Transmittal -  
    Pyramid Oil Company  
    Technical Report - Water Quality Analysis  
    Pike Lease Ponds - Section 28, T32S, R24E  
    Sec 28 Lease Ponds - Section 28, T32S, R24E  
    Midway Sunset Oil Field  
    Kern County

Dear Mr. Holcomb:

On behalf of Pyramid Oil Company, GeoPlus Consulting Services is submitting the referenced Technical Reports pursuant to the Central Valley Regional Water Quality Board's (Board) Order dated April 1, 2015.

I trust that these reports is satisfactory and meets the Board's requirements. We look forward to your favorable response.

Sincerely,

Thomas W. Ladd  
California Professional Geologist # 3568

Cc. Pyramid Oil Company  
    with enclosures

Enclosures:  
    Technical Reports  
    Analytical results as an Excel spreadsheet on CD

**TECHNICAL REPORT**  
**CALIFORNIA WATER CODE DIRECTIVE PURSUANT TO SECTION 13267**  
**REGARDING PRODUCED WATER DISCHARGE**  
**PYRAMID OIL COMPANY**  
**PIKE LEASE**  
**MIDWAY SUNSET FIELD - SECTION 28, R32S, R24E, MD B&M**  
**December 10, 2015**

Pyramid Oil Company (Pyramid) is submitting this Technical Report pursuant to Central Valley Regional Water Quality Board's (Board) Order dated April 1, 2015. Pyramid is the operator of oil wells located on the Pike Lease in Section 28, R32S, R24E, Midway Sunset Field, Kern County. The Pike lease has 1 pond used in the process of petroleum production wastewater disposal. There are no other ponds or discharges of produced waters to land.

**WATER SAMPLES:** A representative water sample of the wastewater was collected from the discharge point to the ponds. The required water quality analyses is presented in the attached Zalco Laboratories report, as well as, on the enclosed CD excel file.

On July 8, 2015, water samples were collected at the point of discharge to ponds. The samples were collected by Thomas W. Ladd and Sean Spanier using appropriate water sampling protocol. Water sampling containers were provided by Zalco Laboratories. The wastewater samples were collected in the containers, labeled, placed in iced chests and transported to Zalco Laboratories, Inc. under chain of custody for analyses as directed in the Order.

**SURFACE IMPOUNDMENTS DETAILS:** The Pyramid produced water is a result of pumping oil and water from the subsurface Caltroleum oil sands at a depth of 3,300 feet. The oil and water are separated and contained at the surface tank facility. Water production is about 88 barrels per day. The wastewater is water-legged to the pond. As a result of retention time during tank oil/water separation, there was no visible crude oil discharged to the pond. This wastewater discharge operates 24 hours per day, 7 days a week, 12-months per year. The pond is operated under WDR RS-2002-0197.

The locations and dimensions of each pond is presented in the following table.

TABLE  
POND DETAILS

Pond 1	
APN	220-080-28-00-0
Latitude	35.116101
Longitude	-119.410399
Length - feet	70
Width - feet	27
Depth - feet	12
Discharge/year (Barrels)	32,000

**LOCATION MAPS:** The following figures depict the Pyramid Pike lease and facility schematic of the pond.

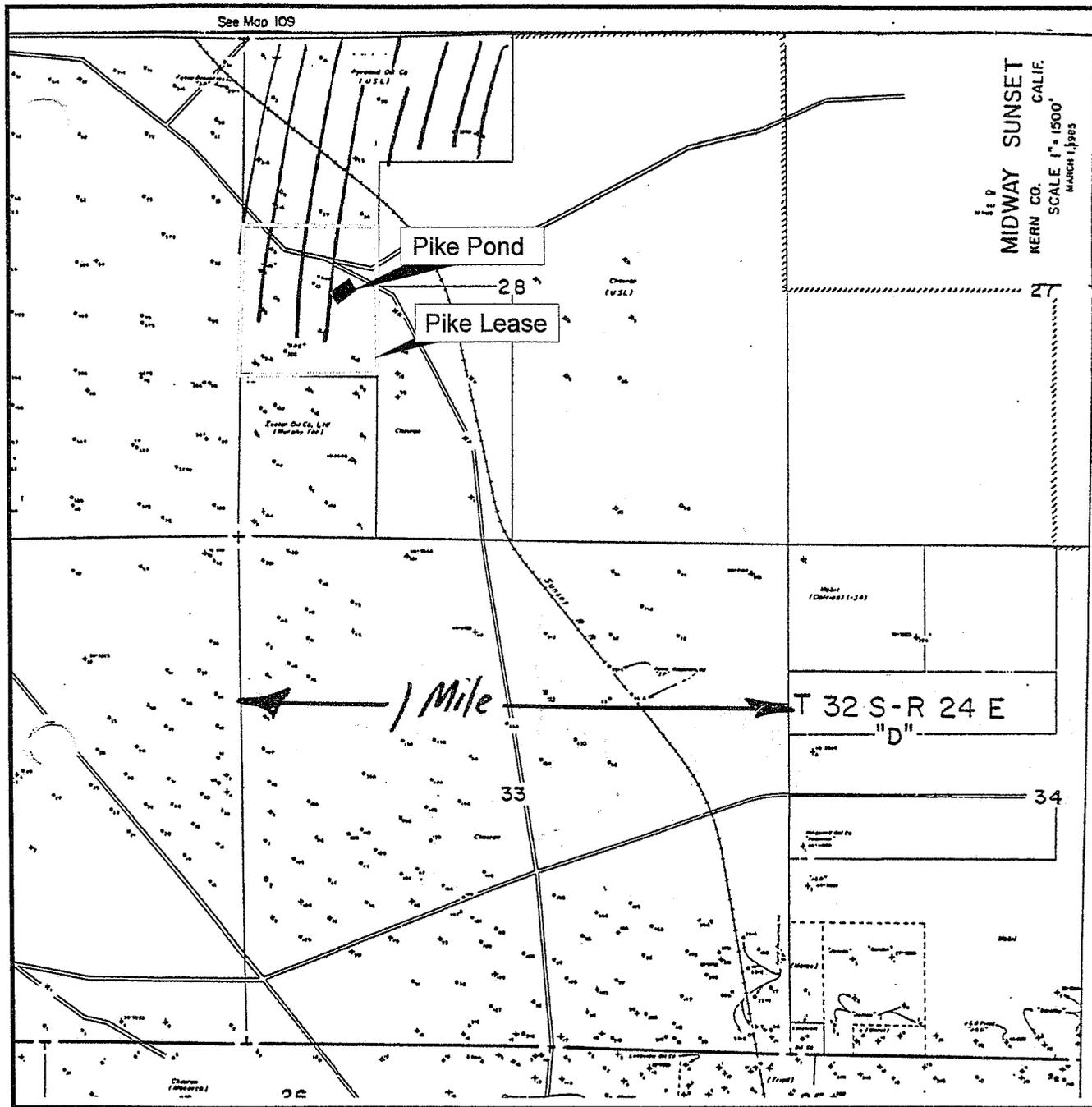


Figure 1 Lease Map  
Pike Lease  
Section 28, T32S, R24E

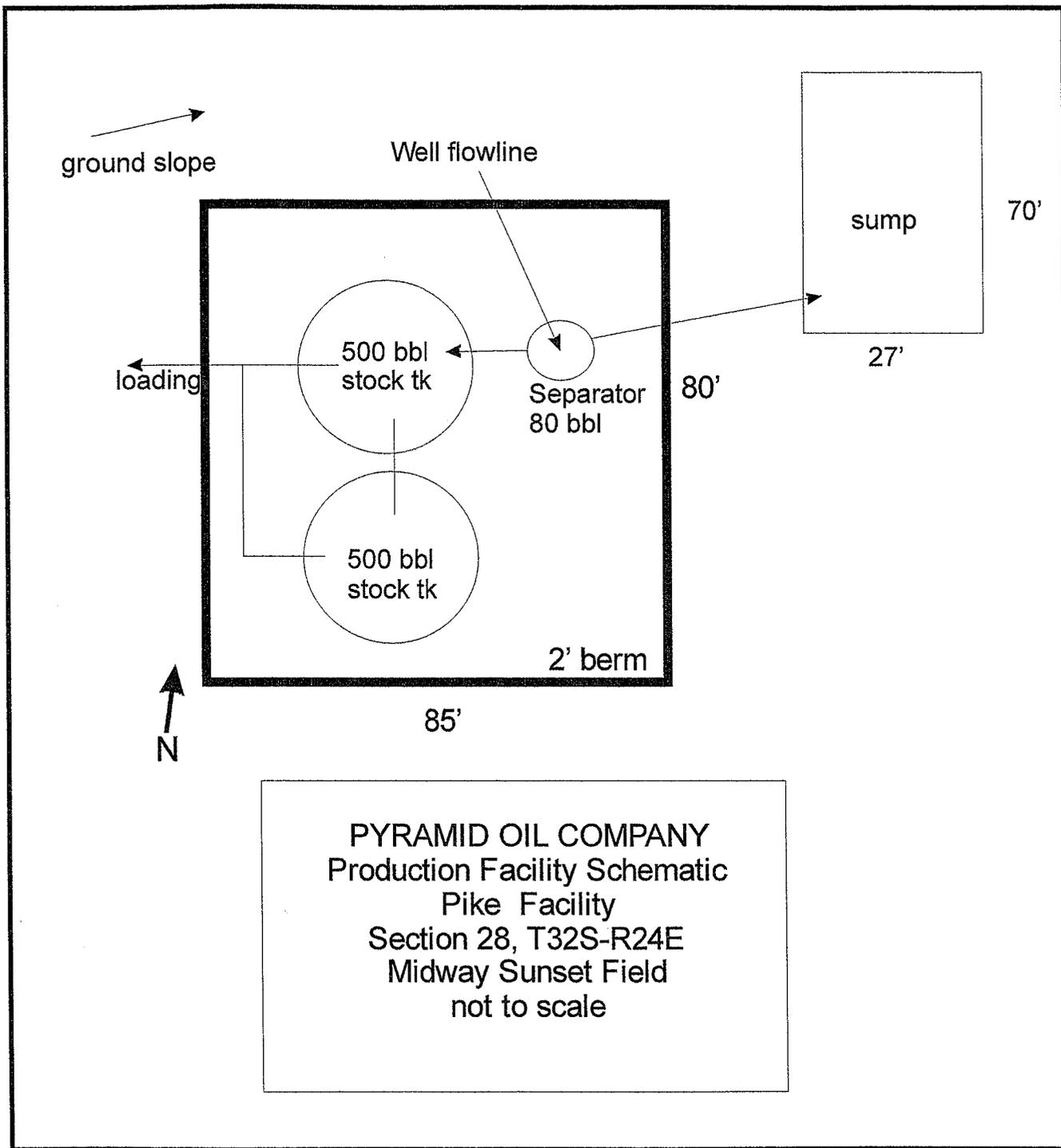


Figure 2 Facility Schematic  
Pike Lease

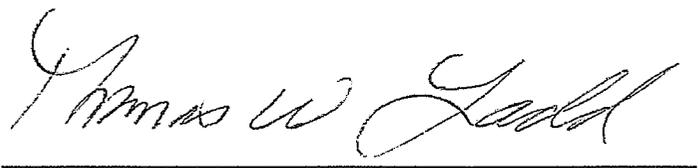
**ENVIRONMENTAL ASSESSMENT OF AREA OF INFLUENCE:** The risk of adverse environmental impact to the area within the a ¼ mile radius area of influence by the discharge of oilfield produced wastewater into the Pike pond is remote. First, the volume of water that is discharged is a moderate average 88 barrel of water per day to the pond. Second, there is no known source of drinking water, i.e., fresh groundwater is absent in the area. And third, the wastewater is non-hazardous.

As a result of this information and review it is concluded that the discharge of wastewater to ponds is a favorable means of wastewater disposal of non-hazardous water from the Pyramid's oil field operations. The risk of adverse environmental impact to the area of influence by the discharge of wastewater into the Pyramid ponds is remote.

The pond is operated under WDR RS-2002-0197.

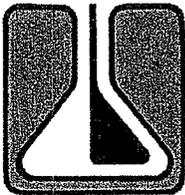
**CERTIFICATION STATEMENT**

*I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.*



Thomas W. Ladd  
California Professional Geologist #3568

Attachment: Zalco Laboratories Report of Analyses



ZALCO LABORATORIES, INC.

Analytical & Consulting Services

4309 Armour Avenue  
Bakersfield, California 93308

(661) 395-0539  
FAX (661) 395-3069

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August 14, 2015

Sean Spanier  
Pyramid Oil Company  
P O Box 832  
Bakersfield, CA 93302

TEL: (661) 325-1000  
FAX: (661) 325-0100

Project ID:  
RE: 1507104

Dear Sean Spanier:

Zalco Laboratories, Inc. received 1 samples on 7/9/2015 for the analyses presented in the following report.

We appreciate your business and look forward to serving you in the future. Please feel free to call our office if you have any questions regarding these test results.

Sincerely,

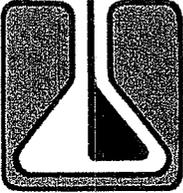
A handwritten signature in cursive script, appearing to read "Juan Magana", is written over the typed name.

Juan Magana  
Project Manager  
CC:

NSS: Non Sufficient Sample H: Exceeds Analysis Hold Time TTLC: Total Threshold Limit Concentration STLC: Soluble Threshold Limit Concentration TCLP: Toxicity Characteristic Leaching Procedure MCL: Maximum Contaminant Level \*: See Case Narrative

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.

Note: Samples analyzed for regulatory purposes should be put on ice immediately after sampling and received by the laboratory at temperatures between 0-6°C. Microbiological analysis requires samples to be at least 4-10°C when received at the laboratory. For additional information regarding the limitations of the method(s) referred to, please call us at 661-395-0539.



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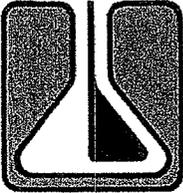
Pyramid Oil Company P O Box 832 Bakersfield, CA 93302	Project: RWQCB Oilfield Ponds - 2Q2015 Project #: Attention: Sean Spanier	Work Order No.: 1507104 Reported: 08/14/2015 Received: 07/09/2015 12:25
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Lab Sample ID: 1507104-01	Collected By: Tom Ladd
Client Sample ID: Pike Lease Produced Water Board Directive Section 13267	Date Collected: 7/8/2015 12:00:00AM

Analyte	Results	PQL	Units	Flag	Method	Date Prepared	Date Analyzed	Init.
<b>Alkalinity</b>								
Total Alkalinity	470	10	mg/L		SM 2320B	7/9/15	7/9/15	SAM
Bicarbonate (HCO3)	470	10	mg/L		SM 2320B	7/9/15	7/9/15	SAM
Carbonate (CO3)	<10	10	mg/L		SM 2320B	7/9/15	7/9/15	SAM
Hydroxide (OH)	<10	10	mg/L		SM 2320B	7/9/15	7/9/15	SAM
<b>CAM, Toxicity (17 Metals)</b>								
			<i>TTLC Limits</i>					
Antimony	<2.0	2.0	500	mg/L	SW846 6010B	7/10/15	7/13/15	SS
Arsenic	<0.20	0.20	500	mg/L	SW846 6010B	7/10/15	7/13/15	SS
Barium	5.8	1.0	10000	mg/L	SW846 6010B	7/10/15	7/13/15	SS
Beryllium	<0.10	0.10	75	mg/L	SW846 6010B	7/10/15	7/13/15	SS
Cadmium	<0.10	0.10	100	mg/L	SW846 6010B	7/10/15	7/13/15	SS
Chromium	<0.50	0.50	2500	mg/L	SW846 6010B	7/10/15	7/13/15	SS
Cobalt	<1.0	1.0	8000	mg/L	SW846 6010B	7/10/15	7/13/15	SS
Copper	<0.50	0.50	2500	mg/L	SW846 6010B	7/10/15	7/13/15	SS
Lead	<0.50	0.50	1000	mg/L	SW846 6010B	7/10/15	7/13/15	SS
Mercury	<0.0020	0.0020	20	mg/L	SW846 7470A	8/4/15	8/4/15	SS
Molybdenum	<1.0	1.0	3500	mg/L	SW846 6010B	7/10/15	7/13/15	SS
Nickel	<0.50	0.50	2000	mg/L	SW846 6010B	7/10/15	7/13/15	SS
Selenium	<0.50	0.50	100	mg/L	SW846 6010B	7/10/15	7/13/15	SS
Silver	<0.20	0.20	500	mg/L	SW846 6010B	7/10/15	7/13/15	SS
Thallium	<5.0	5.0	700	mg/L	SW846 6010B	7/10/15	7/13/15	SS
Vanadium	<1.0	1.0	2400	mg/L	SW846 6010B	7/10/15	7/13/15	SS
Zinc	<0.50	0.50	5000	mg/L	SW846 6010B	7/10/15	7/13/15	SS
<b>General Chemistry</b>								
			<i>MCL Limits</i>					
Fluoride	<1.0	1.0	2	mg/L	EPA 300.0	7/15/15	7/15/15	MSS
Nitrate as NO3	<1000	1000	45	mg/L	EPA 300.0	7/15/15	7/15/15	MSS
Electrical Conductivity	48	0.010		mmhos/cm	SM 2510B	7/9/15	7/9/15	SAM
Resistivity	<0.01000	0.01000		Ohm-Meters	SM 2510 B	8/6/15	8/6/15	MSS
Bromide	170	1.0		mg/L	EPA 300.0	7/15/15	7/15/15	MSS
Chloride	20000	1000		mg/L	EPA 300.0	7/15/15	7/15/15	MSS
pH	6.98			pH Units	EPA 150.1	7/9/15	7/9/15	SAM
Sulfate as SO4	<250	250		mg/L	EPA 300.0	7/15/15	7/15/15	MSS
Total Dissolved Solids	16000	10		mg/L	SM 2540C	7/9/15	7/9/15	MSS

NSS: Non Sufficient Sample H: Exceeds Analysis Hold Time TTLC: Total Threshold Limit Concentration STLC: Soluble Threshold Limit Concentration TCLP: Toxicity Characteristic Leaching Procedure MCL: Maximum Contaminant Level \*: See Case Narrative  
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# ZALCO LABORATORIES, INC.

Analytical & Consulting Services

4309 Armour Avenue  
Bakersfield, California 93308

(661) 395-0539  
FAX (661) 395-3069

Pyramid Oil Company P O Box 832 Bakersfield, CA 93302	Project: RWQCB Oilfield Ponds - 2Q2015 Project #: Attention: Sean Spanier	Work Order No.: 1507104 Reported: 08/14/2015 Received: 07/09/2015 12:25
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Lab Sample ID: 1507104-01	Collected By: Tom Ladd
Client Sample ID: Pike Lease Produced Water Board Directive Section 13267	Date Collected: 7/8/2015 12:00:00AM

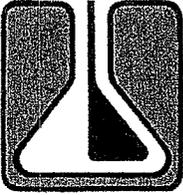
Analyte	Results	PQL	Units	Flag	Method	Date Prepared	Date Analyzed	Init.
<b>Hardness</b>								
Hardness (as CaCO3)	3000	2.0	mg/L		SM 2340B	7/13/15	7/13/15	SS
<b>Metals - As Received</b>								
Lithium	7.2	1.0	mg/L		EPA 200.7	7/13/15	7/14/15	SS
Magnesium	300	0.50	mg/L		EPA 200.7	7/13/15	7/13/15	SS
Potassium	170	5.0	mg/L		EPA 200.7	7/13/15	7/13/15	SS
Sodium	12000	350	mg/L		EPA 200.7	7/13/15	7/13/15	SS
Calcium	720	0.50	mg/L		EPA 200.7	7/13/15	7/13/15	SS
Iron	22	1.0	mg/L		EPA 200.7	7/13/15	7/13/15	SS
Boron	62	1.0	mg/L		EPA 200.7	7/13/15	7/13/15	SS
Barium	4.7	1.0	mg/L		EPA 200.7	7/13/15	7/13/15	SS
Copper	<0.50	0.50	mg/L		EPA 200.7	7/13/15	7/13/15	SS
Silica (SiO2)	46	40	mg/L		EPA 200.7	7/13/15	7/13/15	SS
Strontium	13	1.0	mg/L		EPA 200.7	7/13/15	7/13/15	SS
Manganese	0.97	0.30	mg/L		EPA 200.7	7/13/15	7/13/15	SS
<b>Petroleum Hydrocarbons</b>								
Diesel Range Hydrocarbons	10.9	0.50	mg/L		SW846 8015B	7/17/15	7/21/15	BIG
Gasoline Range Hydrocarbons	1.44	0.250	mg/L		SW846 8015B	7/20/15	7/20/15	HLP
Motor Oil Range Hydrocarbons	9.98	0.15	mg/L		SW846 8015B	7/17/15	7/21/15	BIG

Surrogates	% Recovery	Recovery Limits	Flag
a,a,a-Trifluorotoluene	88.7	69-125	

<b>Polynuclear Aromatic Hydrocarbons</b>								
Indeno(1,2,3-cd)pyrene	<10.0	10.0	ug/L		SW846 8270C	7/15/15	7/21/15	JMM
Naphthalene	48.7	10.0	ug/L		SW846 8270C	7/15/15	7/21/15	JMM
Acenaphthylene	<10.0	10.0	ug/L		SW846 8270C	7/15/15	7/21/15	JMM
Acenaphthene	<10.0	10.0	ug/L		SW846 8270C	7/15/15	7/21/15	JMM
Fluorene	<10.0	10.0	ug/L		SW846 8270C	7/15/15	7/21/15	JMM
Phenanthrene	7.0	10.0	ug/L		SW846 8270C	7/15/15	7/21/15	JMM
Anthracene	<10.0	10.0	ug/L		SW846 8270C	7/15/15	7/21/15	JMM
Fluoranthene	<10.0	10.0	ug/L		SW846 8270C	7/15/15	7/21/15	JMM
Pyrene	<10.0	10.0	ug/L		SW846 8270C	7/15/15	7/21/15	JMM

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Client Sample ID: Pike Lease Produced Water Board Directive Section 13267	Date Collected: 7/8/2015 12:00:00AM

Analyte	Results	PQL	Units	Flag	Method	Date Prepared	Date Analyzed	Init.
<b>Polynuclear Aromatic Hydrocarbons</b>								
Benzo (a) anthracene	<10.0	10.0	ug/L		SW846 8270C	7/15/15	7/21/15	JMM
Chrysene	<10.0	10.0	ug/L		SW846 8270C	7/15/15	7/21/15	JMM
Benzo (b) fluoranthene	<10.0	10.0	ug/L		SW846 8270C	7/15/15	7/21/15	JMM
Benzo (k) fluoranthene	<10.0	10.0	ug/L		SW846 8270C	7/15/15	7/21/15	JMM
Benzo (a) pyrene	<10.0	10.0	ug/L		SW846 8270C	7/15/15	7/21/15	JMM
Dibenz (a,h) anthracene	<10.0	10.0	ug/L		SW846 8270C	7/15/15	7/21/15	JMM
Benzo (g,h,i) perylene	<10.0	10.0	ug/L		SW846 8270C	7/15/15	7/21/15	JMM
2-Methylnaphthalene	65.2	10.0	ug/L		SW846 8270C	7/15/15	7/21/15	JMM
1-Methylnaphthalene	35.5	10.0	ug/L		SW846 8270C	7/15/15	7/21/15	JMM

Surrogates	% Recovery	Recovery Limits	Flag	
Nitrobenzene-d5	5.54	0-95		7/21/15 11:06
2-Fluorobiphenyl	43.9	0-92		7/21/15 11:06
Terphenyl-d14	43.0	0-100		7/21/15 11:06

### Subcontracted Analyses

Analyte	Results	PQL	Units	Flag	Method	Date Prepared	Date Analyzed	Init.
Gross Alpha	<15.0	15.0	pCi/L		SM 7110C	7/29/15	8/14/15	MCS
Radium-226	<3.00	3.00	pCi/L		E903.1	7/24/15	8/14/15	MCS
Radium-228	<2.00	2.00	pCi/L		EPA Ra-05	7/24/15	8/14/15	MCS
Uranium (ug/L)	<20.0	20.0	pCi/L		E908	8/12/15	8/14/15	MCS

### Volatile Organic Compounds

Analyte	Results	PQL	Units	Flag	Method	Date Prepared	Date Analyzed	Init.
m,p-Xylene	35.8	5.00	ug/L		SW846 8260B	7/20/15	7/20/15	HLP
Benzene	53.5	5.00	ug/L		SW846 8260B	7/20/15	7/20/15	HLP
Xylenes, total	68.8		ug/L		SW846 8260B	7/20/15	7/20/15	HLP
Methyl tert-Butyl Ether	<5.00	5.00	ug/L		SW846 8260B	7/20/15	7/20/15	HLP
Ethylbenzene	59.8	5.00	ug/L		SW846 8260B	7/20/15	7/20/15	HLP
Toluene	108	5.00	ug/L		SW846 8260B	7/20/15	7/20/15	HLP
o-Xylene	33.0	5.00	ug/L		SW846 8260B	7/20/15	7/20/15	HLP

Surrogates	% Recovery	Recovery Limits	Flag	
1,2-Dichloroethane-d4	114	89-165		7/20/15 14:12
Toluene-d8	97.2	65-124		7/20/15 14:12
4-Bromofluorobenzene	109	94-114		7/20/15 14:12

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ATTACHMENT BWater Quality Analysis

Wastewater samples collected from the ponds shall be analyzed by a laboratory certified by the Environmental Laboratory Accreditation Program using currently applicable United States Environmental Protection Agency-approved analytical methods for water for the following:

- A. Total dissolved solids;
- B. Metals listed in California Code of Regulations, title 22, section 66261.24. subdivision (a)(2)(A);
- C. Benzene, toluene, ethylbenzene, and xylenes;
- D. Total petroleum hydrocarbons as crude oil;
- E. Polynuclear aromatic hydrocarbons (including acenaphthene, acenaphthylene, anthracene, benzo[a]anthracene, benzo[b]fluoranthene, benzo[a]pyrene, benzo[g,h,i]perylene, chrysene, dibenzo[a,h]anthracene, fluoranthene, fluorine, indeno[1,2,3-cd]pyrene, naphthalene, phenanthrene, and pyrene);
- F. Radionuclides listed under California Code of Regulations, title 22, Table 64442;
- G. Major and minor cations (including sodium, potassium, magnesium, and calcium);
- H. Major and minor anions (including nitrate, chloride, sulfate, carbonate, bicarbonate, and bromide);
- I. Trace elements (including lithium, strontium, boron, iron, and manganese).

Reporting Requirements

Water Quality information shall be submitted in a technical report that includes at a minimum:

- A. Site plan(s) with the location(s) of where the samples were collected;
- B. A description of how the samples, representative of the pond contents, were collected;

Table(s) of analytical results organized by pond number with the data also submitted electronically as an Excel spreadsheet.

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FRESNO, CALIF.

TECHNICAL REPORT  
CALIFORNIA WATER CODE DIRECTIVE PURSUANT TO SECTION 13267  
REGARDING PRODUCED WATER DISCHARGE  
PYRAMID OIL COMPANY  
PIKE SEC 28 LEASE  
MIDWAY SUNSET OIL FIELD - SECTION 28, T32S, R24E, MDB&M  
DECEMBER 10, 2015

Pyramid Oil Company (Pyramid) is the operator of oil wells located on the Pike Sec 28 Lease in Section 28, T32S, R24E, Midway Sunset Oil Field, Kern County. Pyramid is submitting the following Technical Report pursuant to Central Valley Regional Water Quality Board's (Board) Order dated April 1, 2015.

Technical Report

A. *Identification of any discharges of oil field produced waters to land, including but not limited to ponds, since April of 2014 that are not listed in Attachment A.*

The Pike Sec 28 lease has 1 pond historically used in the process of petroleum production wastewater disposal. Since April of 2014, there has been no discharges of oil field produced water to land, to this pond or to any other land to the Sec 28 lease not listed in Attachment A. There are no other ponds or discharges of produced waters to land. The list of ponds for Sec 28 is complete. The listed pond is inactive.

B. *Collect representative samples of wastewater with each of the ponds.*

The listed pond is inactive. There is no fluid present in the pond.

The pond is operated under WDR RS-2002-0196.

C. All available information for each of the surface impoundment(s), including dimensions (i.e., length, width, and depth), latitude and longitude, Assessor's parcel Numbers of the lease, duration of the discharge (in months), and the volume of wastewater discharge per year.

The available information of each pond is presented in the following table.

TABLE  
POND DETAILS

Pond 1

APN	220-080-28-00-0
Latitude	35.120641
Longitude	-119.407333
Length	60 feet
Width	20 feet
Depth	4 feet
Discharge 2014	0 barrels

D. A location map that includes the following information:

- i. All ponds at the Facility
- ii. Include the boundary lines for all leases at the Facility, and
- iii. Legend with the name of the surface impoundments(s).

**LOCATION MAPS:** The following figure depicts the location of Sec 28 lease pond.

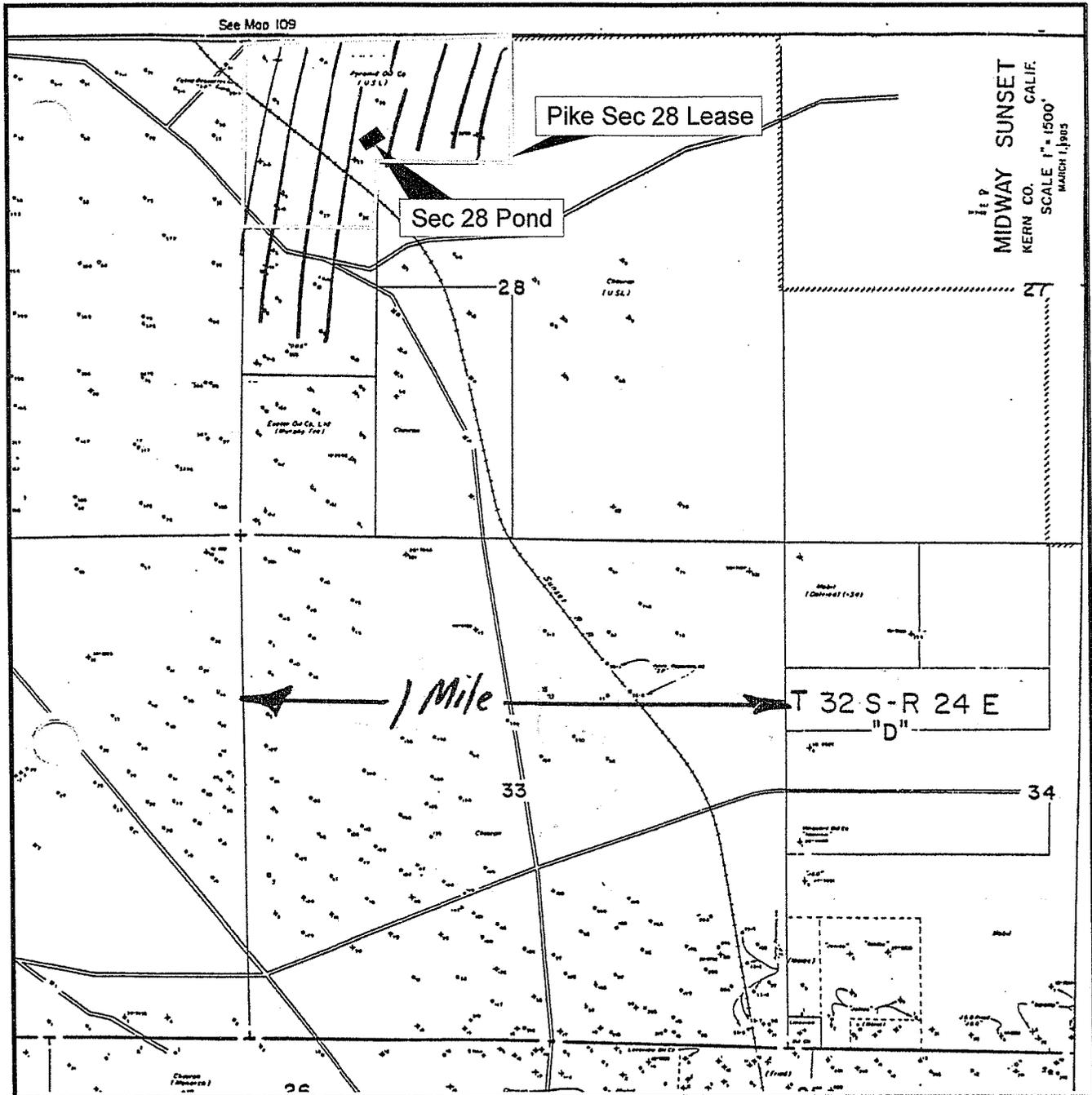


Figure 1. Pike Sec 28 lease outlined in yellow

**CERTIFICATION STATEMENT**

*I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.*



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California Professional Geologist #3568