



IMPERIAL IRRIGATION DISTRICT

OPERATING HEADQUARTERS • P.O. BOX 937 • IMPERIAL, CALIFORNIA 92251

October 12, 2009

Mr. Dave Basinger
Environmental Engineer, Underground Injection Control
Water Division, Mail Code WTR-9
U.S. Environmental Protection Agency, Region 9
75 Hawthorne Street
San Francisco, CA 94105-3901

Subject: El Centro Generating Station (ECGS) – Injection Well Application
Revised Application

Dear Mr. Basinger:

Please find attached two copies of the revised injection well application for the El Centro Generating Station. The revised injection well application includes the following changes:

1. The injection wells were relocated to increase the distance from the abandoned City of El Centro geothermal wells. Based on this increased distance and considering the pressure front calculations presented, weight of the fluid (i.e. mud) within the abandoned wells, etc., we feel that this would eliminate any need to re-enter the abandon wells.
2. Corrections were made to the waste front and pressure front calculations and figures to be consistent in the use of average flow rates. This change was made prior to the October 2006 submittal, but the application was not thoroughly updated.
3. The proposed injection well design was updated due to concerns that the liner size (i.e. diameter) was not adequate for the 850 gpm maximum design flow rate.

We would also like to request that the language in the draft permit requiring the flow meter to be placed immediately before the wellhead be changed to only require that each well have a dedicated flow meter. This would allow the flow meter to be placed in a more convenient location from a construction standpoint while achieving the intended purpose.

Please feel free to contact either myself at 760.339.0506 or Wayne Lane, at 760.339.0642, if you have any questions or require additional information.

Sincerely,

Michael Taylor
General Superintendent, Energy Production

Enclosures

cc: Wayne Lane, IID
Mike Woods, CDOGGR
Jose Figueroa-Acevedo, CRWQCB

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OCT 29 2009

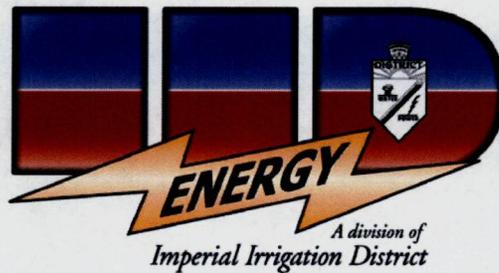
REGION 7

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**EL CENTRO GENERATING STATION
DEEP INJECTION WELLS
APPLICATION**

EL CENTRO, CALIFORNIA

Prepared for:



Prepared by:

URS

**Original Submittal
OCTOBER 2006**

Revised OCTOBER 2009

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OCT 29 2009

REGION 7