CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD CENTRAL VALLEY REGION

CLEANUP AND ABATEMENT ORDER NO. R5-2015-0067 FOR LONGVIEW PRODUCTION COMPANY SURFLUH LEASE, RAISIN CITY OIL FIELD FRESNO COUNTY

The California Regional Water Quality Control Board, Central Valley Region (hereafter Central Valley Water Board), finds that:

- 1. The Longview Production Company (hereinafter Discharger) operates a petroleum production and petroleum wastewater discharge facility at its Surfluh Lease in the Raisin City Oil Field (Surfluh Lease). The Surfluh Lease, approximately seven miles south of Kerman (Assessor's Parcel Number 030-007-71), is located in the southeast quarter of the northeast quarter of Section 14, T15S, R17E, MDB&M (see Attachment A, which is attached hereto and made a part of this Order).
- 2. The Surfluh Lease contains two wastewater injection wells and one pond to which wastewater is periodically released. Wastewater is separated from the extracted crude oil and discharged to the injection well and is allowed to flow to the unlined pond for percolation and evaporation. The pond is approximately 50 feet in diameter (see Attachment B, which is attached hereto and made a part of this Order).
- 3. The Surfluh Lease is not regulated by Waste Discharge Requirements (WDRs) for the discharge of petroleum production wastewaters. The Discharger has not submitted a Report of Waste Discharge.
- 4. This Order contains a time schedule to achieve compliance with the California Water Code (Water Code) and the *Water Quality Control Plan for the Tulare Lake Basin Second Edition, Revised January 2004* (Basin Plan), and requires that by 31 December 2016, the Discharger demonstrate that the discharge to these ponds can comply with the applicable laws, policies, and regulations or the discharge will have to cease by that date.
- 5. The Basin Plan designates beneficial uses, establishes water quality objectives, and contains implementation plans and policies for all waters of the Basin.
- 6. Surface drainage is toward the James Bypass in the Raisin Hydrologic Area (551.20) of the Tulare Lake Basin. Surface waters in the Raisin Hydrologic Area are designated as Valley Floor Waters. The designated beneficial uses of Valley Floor Waters, as specified in the Basin Plan, are agricultural supply; industrial service and process supply; water contact and non-contact water recreation; warm fresh water habitat; preservation of rare, threatened and endangered species; and groundwater recharge.
- 7. The Surfluh Lease is in the Delta Mendota Basin Hydrologic Unit, Detailed Analysis Unit (DAU) 235. The designated beneficial uses of the groundwater, as specified in the Basin Plan for DAU 235 are municipal and domestic water supply, agricultural supply, industrial service and process supply, non-contact water recreation, and wildlife habitat.

- 8. Information obtained from the United States Geological Survey and the California Department of Water Resources identified four groundwater supply wells within about one-mile of the facility.
- 9. Groundwater samples were obtained from the wells from 1955 to 1973. Chemical analysis of those samples showed the following constituents at the indicated values: From a well about one mile away from the Surfluh Lease:

<u>Units:</u> <u>Measured Value Range:</u>

Specific EC: micromohs per centimeter 482 – 491

(µmhos/cm)

Chloride: milligrams per liter (mg/l) 82 - 86

Boron: mg/l None Detected – 0.12

From a well adjacent to the Surfluh Lease:

Units: Measured Values:

 Specific EC:
 μmhos/cm
 9,000

 Chloride:
 mg/l
 115

 Boron:
 mg/l
 4.5

10. This Cleanup and Abatement Order is based upon: 1) Chapter 5, Enforcement and Implementation commencing with section 13300, of the Porter-Cologne Water Quality Control Act (Water Code Division 7, commencing with section 13000); 2) Water Code section 13267, Investigations; inspections, Chapter 4, Regional Water Quality Control; 3) all applicable provisions of the Basin Plan including beneficial uses, water quality objectives, and implementation plans; 4) California State Water Resources Control Board (State Water Board) Resolution No. 68-16 (Statement of Policy with Respect to Maintaining High Quality of Waters in California); 5) State Water Board Resolution No. 92-49 (Policies and Procedures for Investigation and Cleanup and Abatement of Discharges Under Water Code section 13304); 6) and all other applicable legal authority.

¹ Water Code section 13267, subdivision (b)(1) states: "In conducting an investigation specified in subdivision (a), the regional board may require that any person who has discharged, discharges, or is suspected of having discharged or discharging, or who proposes to discharge waste within its region, or any citizen or domiciliary, or political agency or entity of this state who has discharged, discharges, or is suspected of having discharged or discharging, or who proposes to discharge, waste outside of its region that could affect the quality of waters within its region shall furnish, under penalty of perjury, technical or monitoring program reports which the regional board requires. The burden, including costs, of these reports shall bear a reasonable relationship to the need for the report and the benefits to be obtained from the reports. In requiring those reports, the regional board shall provide the person with a written explanation with regard to the need for the reports, and shall identify the evidence that supports requiring that person to provide the reports."

11. <u>Discharge of Waste to Land</u>: This information is based upon the 4 February 2014 Central Valley Water Board inspection of the Surfluh Lease. The Basin Plan sets forth the following specific waste constituent limits for discharges of oil field wastewater to unlined ponds:

 Units:
 Limitation Value:

 Specific EC:
 μmhos/cm
 1000

 Chloride:
 mg/l
 200

 Boron:
 mg/l
 1

- 12. The Basin Plan allows discharges of oil field wastewater that exceed the above maximum salinity limits to unlined sumps, stream channels, or surface waters if the Discharger successfully demonstrates to the Central Valley Water Board in a public hearing that the proposed discharge will not substantially affect water quality nor cause a violation of water quality objectives.
- 13. The results of the analyses of wastewater sampled from the Surfluh Lease pond were reported in the inspection report at the following values for the listed constituents:

 Units:
 Measured Value:

 Specific EC:
 μmhos/cm
 41,000

 Chloride:
 mg/l
 15,000

 Boron:
 mg/l
 7.7

- 14. On 27 March 2015, the Central Valley Water Board issued a Notice of Violation (NOV) to the Discharger (see Attachment C, which is attached hereto and made a part of this Order). The NOV alleged that the discharge was in violation of Section 13260 of the California Water Code for failure to submit a Report of Waste Discharge before discharging waste that could affect the quality of waters of the state, and that the Discharger was discharging wastewater in excess of the numerical limitations specified in the Basin Plan (see Finding No. 10), which is causing, or is threatening to cause a condition of pollution, ² contamination or nuisance. ³
- 15. Section 13304(a) of the Water Code provides that:

Any person who has discharged or discharges waste into the waters of this state in violation of any waste discharge requirement or other order or prohibition issued by a regional board or the state board, or who has

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² "Pollution" is defined by Water Code section 13050, subdivision (I)(1) as, an alteration of the quality of the waters of the state by waste to a degree which unreasonably affects either of the following: (A) The waters for beneficial uses; (B) Facilities which serve these beneficial uses.

³ "Nuisance" means anything which meets all of the following requirements: (1) Is injurious to health, or is indecent or offensive to the senses, or an obstruction to the free use of property, so as to interfere with the comfortable enjoyment of life or property. (2) Affects at the same time an entire community or neighborhood, or any considerable number of persons, although the extent of the annoyance or damage inflicted upon individuals may be unequal. (3) Occurs during, or as a result of, the treatment or disposal of wastes. Water Code §13050(m).

caused or permitted, causes or permits, or threatens to cause or permit any waste to be discharged or deposited where it is, or probably will be. discharged into the waters of the state and creates, or threatens to create, a condition of pollution or nuisance, shall upon order of the regional board, clean up the waste or abate the effects of the waste, or, in the case of threatened pollution or nuisance, take other necessary remedial action, including, but not limited to, overseeing cleanup and abatement efforts. A cleanup and abatement order issued by the state board or a regional board may require the provision of, or payment for, uninterrupted replacement water service, which may include wellhead treatment, to each affected public water supplier or private well owner. Upon failure of any person to comply with the cleanup or abatement order, the Attorney General, at the request of the board, shall petition the superior court for that county for the issuance of an injunction requiring the person to comply with the order. In the suit, the court shall have jurisdiction to grant a prohibitory or mandatory injunction, either preliminary or permanent, as the facts may warrant.

- 16. Oil field produced water can contain elevated concentrations of general minerals (especially total dissolved solids and chloride), metals (i.e., arsenic), trace elements (i.e., boron, strontium, thallium, lithium, etc.), petroleum hydrocarbons, polynuclear aeromatic hydrocarbons (PAHs), volatile organic compounds (VOCs, i.e., benzene, toluene, ethylbenzene, and xylenes [BTEX]), and radionuclides. The unauthorized discharge of waste containing oil field waste constituents to ground and/or groundwater creates, or threatens to create, a condition of pollution in groundwater, and may result in the degradation of water quality.
- 17. Land surrounding the Surfluh Lease is being used for agricultural production. Many of the crops are irrigated with groundwater from local supply wells. Based on Ayers and Westcott (1985), irrigation water with a chloride concentration above 350 mg/l can cause severe crop problems. Boron toxicity can occur on sensitive crops at concentrations less than 1 mg/l in irrigation water.
- 18. Underlying groundwater may be degraded if mixed with oil field wastewater. Oil field wastewater constituents could impair the groundwater for municipal and domestic supply and agricultural supply uses.
- 19. An investigation is necessary to determine whether the discharge of wastewater in excess of water quality objectives has caused or threatens to cause a threat or condition of pollution or nuisance to groundwater.
- 20. The following actions will determine the threat and/or impacts to groundwater as a result of the discharges at the Surfluh Lease in violation of the Basin Plan and the California Water Code:
 - a. Development of a work plan to conduct a hydrogeological site characterization and assess potential groundwater degradation by discharges from this facility;

- Documentation of the average monthly volume of wastewater discharged to the ponds during the previous year will be submitted, and continued discharge during the investigation will not exceed the average monthly discharge rate calculated for the prior year; and
- c. This Order requires that if degradation of groundwater due to discharge from any of the ponds is documented, then a work plan to delineate the nature and extent of the release and a plan to remediate the effects of the release must be submitted.
- 21. The deliverables ordered herein (work plans, signing up for WDRs, investigations, etc. as necessary) are needed to provide information to the Central Valley Water Board regarding (a) the nature and extent of the discharge, (b) the nature and extent of pollution conditions in State waters created by the discharge, (c) the threat to public health posed by the discharge, and (d) appropriate cleanup and abatement measures. The deliverables will enable the Central Valley Water Board to determine the vertical and lateral extent of the discharge, ascertain whether the condition of pollution poses a threat to human health in the vicinity of the Surfluh Lease, and provide technical information to determine the cleanup and abatement measures necessary to bring the Site into compliance with applicable water quality standards. Based on the nature and possible consequences of the discharges, including impacts to groundwater supply, the burden of providing the required information, including costs, bears a reasonable relationship to the need for the required reports, and the benefits to be obtained from the reports. The deadlines set forth herein are reasonable given the need to investigate the potential threat to groundwater quality.
- 22. In accordance with Water Code section 13267(b), these findings provide the Discharger with a written explanation with regard to the need for remedial action and reports, and identify the evidence that supports the requirement to implement investigative activities, to implement cleanup and abatement activities if needed, and to submit the reports. The Discharger owns a portion of the mineral rights and operates the Surfluh Lease which is subject to this Cleanup and Abatement Order. The technical and monitoring reports required by this Order are necessary to determine compliance with this Cleanup and Abatement Order.
- 23. Issuance of this Cleanup and Abatement Order is being taken for the protection of the environment and as such is exempt from provisions of the California Environmental Quality Act (CEQA) (Public Resources Code section 21000 et seq.) in accordance with California Code of Regulations, title 14, sections 15061(b)(3), 15306, 15307, 15308, and 15321. This Cleanup and Abatement Order generally requires the Discharger to submit plans for approval prior to implementation of investigative and, if necessary, cleanup activities at the Surfluh Lease. Mere submission of plans is exempt from CEQA as submission will not cause a direct or indirect physical change in the environment and/or is an activity that cannot possibly have a significant effect on the environment. CEQA review at this time would be premature and speculative, as there is simply not enough information concerning the Discharger's proposed remedial activities and possible associated environmental impacts. If the Central Valley Water Board determines that implementation of any plan required by this Cleanup and Abatement Order will have a

- significant effect on the environment, the Central Valley Water Board will conduct the necessary and appropriate environmental review prior to the Executive Officer's approval of the applicable plan.
- 24. The Discharger will bear the costs, including the Central Valley Water Board's costs, of determining whether implementation of any plan required by this Cleanup and Abatement Order will have a significant effect on the environment and, if so, in preparing and handing any documents necessary for environmental review. If necessary, the Discharger and a consultant acceptable to the Central Valley Water Board shall enter into a memorandum of understanding with the Central Valley Water Board regarding such costs prior to undertaking any environmental review.

IT IS HEREBY ORDERED that, pursuant to section 13304 and section 13267 of Division 7 of the California Water Code, the Longview Production Company shall cease the discharge of wastewater in violation of applicable laws, policies, and regulations, and clean up and abate the condition of unauthorized discharge in accordance with the schedule below:

- 1. By **15 July 2015**, the Discharger shall prepare and submit to the Central Valley Water Board a Work Plan with a time schedule proposed by the Discharger and approved by the Assistant Executive Officer. The schedule shall provide the ability to determine whether the discharge can comply with applicable laws, policies, and regulations that would allow the issuance of waste discharge requirements by 31 October 2016. If issuance of waste discharge requirements is not obtained by 31 December 2016, the discharge shall cease. The Work Plan needs to include, but is not limited to, the following tasks:
 - Identify all owners of the surface rights and the mineral rights of the Surfluh Lease property.
 - b. Conduct a hydrogeological site characterization to assess the effects of the discharge of high-salinity wastewater on underlying groundwater. The characterization shall be conducted in a manner to utilize acquired information to further assess the impacts of the wastewater discharge on groundwater. If the Discharger demonstrates that the wastes discharged to the ponds cannot affect the quality of underlying groundwater, the Assistant Executive Officer may rescind by signed letter all or part of the requirements to complete the groundwater investigation and groundwater monitoring portions of this Order.
 - c. The hydrogeological characterization, and a determination whether there has been a release of waste constituents to groundwater shall be consistent with the detection monitoring requirements of Title 27, CCR, section 20005 et seq. (Title 27). This includes the development of a Sampling and Analysis Plan (SAP); the location and installation of groundwater monitoring wells; soil sampling locations (if necessary); and the sampling and analysis methods for groundwater and soil samples;

- d. Monitoring wells installed for the hydrogeological characterization shall be installed at appropriate depths that will allow the collection of representative groundwater samples. Existing groundwater wells documented to be in appropriate locations, where well depth and construction details can be provided, may be proposed as sampling points;
- e. Collect and submit representative groundwater and soil samples for laboratory analysis for the waste constituents listed in Table I of Monitoring and Reporting Program No. R5-2015-0067 in accordance with a SAP approved by the Assistant Executive Officer:
- f. Conduct a well survey to identify all water supply wells within one-mile of the ponds. The Discharger shall sample the identified domestic water supply wells and analyze the samples for the waste constituents listed in Table I of Monitoring and Reporting Program No. R5-2015-0067. If access to private property is needed, requested, and denied, a demonstration of that is required;
- g. If the investigation determines that a release of wastewater to groundwater or soils has occurred, the hydrogeological characterization shall include a characterization of the nature and extent of the release consistent with the evaluation monitoring program requirements contained in section 20425 of Title 27;
- h. If the investigation determines that a release of wastewater to groundwater or soils has occurred, then following the characterization of the nature and extent of the release, a groundwater remediation program shall be submitted for Assistant Executive Officer review and approval that is consistent with the corrective action program requirements contained in section 20430 of Title 27. This will entail the preparation of an engineering feasibility study followed by a proposed corrective action program;
- i. Include in the report a table that provides the total monthly discharge in barrels and gallons to the sump(s) subject to this Order from 1 January 2013 to the end of the month immediately preceding the date of the report. The table shall include a description of the sources and volume of each individual waste stream going to the pond;
- j. Calculation of the average monthly discharge of wastes to the ponds from 1 June 2014 through 1 June 2015;
- k. The pond shall either be free of oil or effectively screened and maintained to preclude entry of birds or animals;
- Pond adjacent to natural drainage courses shall be protected from inundation or washout, or properly closed; and
- m. Based on information acquired during the hydrogeological site characterization, submit a report of waste discharge (RWD) for preparation of waste discharge

requirements, if appropriate, consistent with current regulations and policies. It is anticipated that general WDRs for discharges to unlined ponds will be presented to the Central Valley Water Board for adoption by August 2016. Submittal of a Notice of Intent to come under a general WDR, with the additional technical information, will meet the requirement of a RWD.

- 2. Beginning **1 September 2015**, or a date approved by the Assistant Executive, and quarterly thereafter until all Work Plan activities are complete, the Discharger shall submit technical reports that provide information to document the Work Plan activities completed to date and to ultimately document that all elements of the Work Plan have been completed. Corrective actions shall be proposed and included in these technical reports when Work Plan activities fail to satisfy any interim or final success criteria.
- 3. The Discharger shall comply with Monitoring and Reporting Program No. R5-2015-0067 (MRP), which is part of this Order, and any revisions thereto as ordered by the Assistant Executive Officer. The submission dates of self-monitoring reports shall be no later than the submission date specified in the MRP.
- 4. The monthly discharge volume of oil field wastewater to the ponds shall not exceed the average monthly discharge volume calculated in Order 1.j. above.
- 5. The Discharger shall not discharge produced fluids to any location on the Surfluh Lease other than a permitted injection well, a permitted pond or disposal facility, or the ponds which are the subject of this Order.
- 6. **All activities in the Work Plan shall be completed** in accordance with time frames included in the Work Plan as approved by the Assistant Executive Officer.
- 7. With each report required by this Cleanup and Abatement Order, the Discharger shall provide under penalty of perjury under the laws of California a "Certification" statement to the Central Valley Water Board. The "Certification" shall include the following signed 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. Pursuant to Water Code section 13350, any person who intentionally or negligently violates a cleanup and abatement order may be liable civilly in an amount which shall not exceed five thousand dollars (\$5,000), but shall not be less than five hundred dollars (\$500), for each day in which the cleanup and abatement order is violated.

8. If it is determined that discharges from the Surfluh Lease have impacted the beneficial uses of water, the Discharger can be further required upon notification by the Assistant Executive Officer to provide a replacement water supply or treat the water to allow continued use.

NOTIFICATIONS

- 1. **Applicability**. Requirements established pursuant to Water Code sections 13304 and 13267(b) are enforceable when signed by the Assistant Executive Officer of the Central Valley Water Board.
- 2. **Enforcement Actions.** The Central Valley Water Board reserves its right to take any enforcement action authorized by law for violations, including but not limited to, violations of the terms and conditions of this Cleanup and Abatement Order.
- 3. **Inspection and Entry.** The Discharger shall allow the Central Valley Water Board or State Water Board, and/or their authorized representatives (including an authorized contractor acting as their representative), upon the presentation of credentials and other documents, as may be required by law, to at reasonable times do the following:
 - a. Enter upon the properties;
 - b. Access and copy any records related to this Cleanup and Abatement Order;
 - c. Inspect and photograph any facilities, equipment, practices, or operations regulated or required by this Cleanup and Abatement Order; and
 - d. Sample or monitor any substances or parameters on-site for the purposes of assuring Cleanup and Abatement Order compliance or as otherwise authorized by the Porter-Cologne Water Quality Control Act.
- 4. **Potential Liability.** Pursuant to Water Code section 13350, any person who intentionally or negligently violates a cleanup and abatement order may be liable civilly in an amount which shall not exceed five thousand dollars (\$5,000), but shall not be less than five hundred dollars (\$500), for each day in which the cleanup and abatement order is violated. Pursuant to Water Code section 13268, any person failing or refusing to furnish technical or monitoring program reports as required by section 13267, or falsifying any information provided therein, is guilty of a misdemeanor, and may be liable civilly in an amount which shall not exceed one thousand dollars (\$1,000) for each day in which the violation occurs.
- Cost Reimbursement. Pursuant to Water Code section 13304, the Central Valley Water Board is entitled to, and may seek reimbursement for, all reasonable costs it actually incurs to investigate unauthorized discharges of waste and to oversee cleanup of such waste, abatement of the effects thereof, or other remedial action, required by this Cleanup and Abatement Order. The Discharger shall reimburse the State of California for all reasonable costs actually incurred by the Central Valley Water Board to investigate unauthorized discharges of waste and to oversee cleanup of such waste,

abatement of the effects thereof, or other remedial action, required by this Cleanup and Abatement Order, according to billing statements prepared from time to time by the State Water Board.

- 6. Waste Management. The Discharger shall properly manage, store, treat, and dispose of contaminated soils and groundwater which are extracted or disturbed during the investigation in accordance with applicable federal, state, and local laws and regulations. The storage, handling, treatment, or disposal of soil containing waste constituents and polluted groundwater shall not create conditions of pollution, contamination or nuisance as defined in Water Code section 13050(m). The Discharger shall obtain or apply for coverage under waste discharge requirements or a conditional waiver of waste discharge requirements for any discharge of the waste to (a) land for treatment, storage, or disposal or (b) waters of the State.
- 7. Requesting Administrative Review by the State Water Board. Any person aggrieved by an action of the Central Valley Water Board that is subject to review as set forth in Water Code section 13320(a), may petition the State Water Board to review the action. Any petition must be made in accordance with Water Code section 13320 and California Code of Regulations, title 23, section 2050 and following. The State Water Board must receive the petition within thirty (30) days of the date the action was taken, except that if the thirtieth day following the date the action was taken falls on a Saturday, Sunday, or state holiday, then the State Water Board must receive the petition by 5:00 p.m. on the next business day. Copies of the laws and regulations applicable to filing petitions may be found on the internet at http://www.waterboards.ca.gov/public_notices/petitions/water_quality/index.shtml or will be provided upon request.
- 8. **Modifications.** Any modification to this Cleanup and Abatement Order shall be in writing and approved by the Assistant Executive Officer, including any extensions. Any written extension request by the Discharger shall include justification for the delay.
- 9. **No Limitation of Water Board Authority**. This Cleanup and Abatement Order in no way limits the authority or ability of the Central Valley Water Board to institute additional enforcement actions or to require additional investigation and any necessary cleanup of the property consistent with the Water Code. This Cleanup and Abatement Order may be revised as additional information becomes available.

REPORTING REQUIREMENTS

1. **Duty to Use Qualified Professionals.** The Discharger shall provide documentation that plans and reports required under this Cleanup and Abatement Order are prepared under the direction of appropriately qualified professionals. Business and Professions Code sections 6735, 7835, and 7835.1 require that engineering and geologic evaluations and judgments be performed by or under the direction of licensed professionals. The Discharger shall include a statement of qualifications and license numbers, if applicable, of the responsible lead professionals in all plans and reportsrequired under this Cleanup and Abatement Order. The lead professional shall

sign and affix their license stamp, as applicable, to the report, plan, or document.

- 2. Electronic and Paper Media Reporting Requirements. The Discharger shall submit both electronic and paper copies of all reports required under this Cleanup and Abatement Order including work plans, technical reports, and monitoring reports. Larger documents shall be divided into separate files at logical places in the report to keep file sizes under 150 megabytes. The Discharger shall continue to provide a paper transmittal letter, a paper copy of all figures larger than 8.5 inches by 14 inches (legal size), and an electronic copy (on Compact Disc [CD] or other appropriate media) of all reports to the Central Valley Water Board. All paper correspondence and documents submitted to the Central Valley Water Board must include the following identification numbers in the header or subject line: Geotracker Site ID: T10000006602. The Discharger shall comply with the following reporting requirements for all reports and plans (and amendments thereto) required by this Cleanup and Abatement Order:
 - a. Reports and Plans Required by this Cleanup and Abatement Order. The Discharger shall submit one paper and one electronic, searchable Portable Document Format (PDF) copy of all technical reports, monitoring reports, progress reports, and plans required by this Cleanup and Abatement Order. The PDF copy of all the reports shall also be uploaded into the Geotracker database, as required by Reporting Requirement 2.(b)(iv) below.
 - b. Electronic Data Submittals to the Central Valley Water Board in compliance with the Cleanup and Abatement Order are required to be submitted electronically via the Internet into the Geotracker database http://geotracker.waterboards.ca.gov/ (Geotracker Site ID: T10000006602). The electronic data shall be uploaded on or prior to the regulatory due dates set forth in the Cleanup and Abatement Order or addenda thereto. To comply with these requirements, The Discharger shall upload to the Geotracker database the following minimum information:
 - i. Laboratory Analytical Data: Analytical data (including geochemical data) for all waste, soil, and water samples shall be submitted in Electronic Deliverable Format (EDF), which facilitates the transfer of data from the laboratory to the end user. Waste, soil, and water include analytical results of samples collected from the following locations and devices: surface samples, equipment, monitoring wells, boreholes, gas and vapor wells or other collection devices, groundwater, piezometers, and stockpiles.
 - ii. Locational Data: All permanent monitoring locations (monitoring wells, sediment sampling locations, etc.) shall be surveyed with latitude and longitude coordinates in a decimal degree format basin on the North American Datum 1983 ellipsoid, and accurate to within one meter (3 feet).
 - iii. Site Map: Site map or maps which display discharge locations, streets bordering the facility, and sampling locations for all waste, soil, and water samples. The site map is a stand-alone document that may be submitted in various electronic formats. A site map must also be uploaded to show

the maximum extent of any soil impact and water pollution. An update to the site map may be uploaded at any time.

- iv. Electronic Report: A complete copy (in character searchable PDF) of all work plans, work plan modifications, assessment, cleanup, and monitoring reports including the signed transmittal letters, professional certifications, and all data presented in the reports.
- 3. Oversight Reimbursement. Reimburse the Central Valley Water Board for reasonable costs associated with oversight of the investigation and remediation of the Site, as provided in Water Code section 13304(c) (1). By 15 July 2015, provide the name and address where the invoices shall be sent. Failure to provide a name and address for invoices and/or failure to reimburse the Central Valley Water Board's reasonable oversight costs shall be considered a violation of this Cleanup and Abatement Order.
- 4. Signatory Requirements. All reports required under this Cleanup and Abatement Order shall be signed and certified by The Discharger or by a duly authorized representative and submitted to the Central Valley Water Board. A person is a duly authorized representative only if: 1) The authorization is made in writing by The Discharger; and 2) The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity. (A duly authorized representative may thus be either a named individual or any individual occupying a named position.).
- 5. All monitoring and technical reports required under this Cleanup and Abatement Order shall be submitted to:

California Regional Water Quality Control Board Central Valley Region 1685 E Street, Suite 200 Fresno, CA 93706 Attn: Ron Holcomb

Geotracker Site ID: **T10000006602**

6. FAILURE TO COMPLY WITH THE PROVISIONS OF THIS CLEANUP AND ABATEMENT ORDER MAY SUBJECT YOU TO FURTHER ENFORCEMENT ACTION, INCLUDING BUT NOT LIMITED TO, ASSESSMENT OF CIVIL LIABILITY UNDER SECTIONS 13268 AND 13350 OF THE WATER CODE AND REFERRAL TO THE DISTRICT ATTORNEY OR ATTORNEY GENERAL FOR INJUNCTIVE RELIEF AND CIVIL OR CRIMINAL LIABILITY.

I Pamela Creedon, Executive Officer, do hereby certify that this Order is a full, true and correct copy of the Order adopted by the California Regional Water Quality Control Board, Central Valley Region, on 4 June, 2015.

Original signed by:

PAMELA C. CREEDON, Executive Officer

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD CENTRAL VALLEY REGION

MONITORING AND REPORTING PROGRAM R5-2015-0067
FOR
LONGVIEW PRODUCTION COMPANY
SURFLUH LEASE
RAISIN CITY OIL FIELD
FRESNO COUNTY

Compliance with this Monitoring and Reporting Program is required pursuant to Water Code section 13267 as ordered by Cleanup and Abatement Order R5-2015-0067 (the "CAO"). Failure to comply with this program constitutes noncompliance with the CAO and the Water Code, which can result in the imposition of civil liability. All sampling and analyses shall be by United States Environmental Protection Agency (USEPA) approved methods. The test methods chosen for detection of the constituents of concern shall be subject to review and concurrence by the California Regional Water Quality Control Board, Central Valley Region ("Central Valley Water Board").

A complete list of substances which are tested for and reported on by the testing laboratory shall be provided to the Central Valley Water Board. All peaks must be reported. In addition, both the method detection limit and the practical quantification limit shall be reported. Detection limits shall equal or be more precise than USEPA methodologies. Water samples must be analyzed within allowable holding time limits as specified in 40 CFR Part 136. All quality assurance/quality control (QA/QC) samples must be run on the same dates when samples were actually analyzed. Proper chain of custody procedures must be followed and a copy of the completed chain of custody form shall be submitted with the report. All analyses must be performed by a California Department of Public Health certified laboratory.

The Discharger shall maintain all sampling and analytical results: date, exact place, and time of sampling; dates analyses were performed; analyst's name; analytical techniques used; and results of all analyses. Such records shall be retained for a minimum of three years. This period of retention shall be extended during the course of any unresolved litigation regarding this discharge, or when requested by the Central Valley Water Board.

GROUNDWATER MONITORING

The Discharger shall operate and maintain a groundwater monitoring system that complies with the requirements of the CAO and is consistent with the detection monitoring requirements of section 20420 et seq. of Title 27, CCR, section 20005 et seq. (Title 27). The monitoring system shall be certified by a California-licensed professional civil engineer or geologist as being consistent with the detection monitoring requirements of Title 27. The Discharger shall revise the groundwater monitoring system (after review and approval by Central Valley Water Board staff) as needed to characterize the groundwater and to delineate the nature and extent of any release of waste constituents due to the operation of the surface impoundments (ponds) that are the subject of the CAO.

Groundwater samples shall be collected from groundwater monitoring wells and other sampling points established in accordance with the hydrogeological characterization required by the CAO. The collected samples shall be analyzed for the parameters and constituents listed in Table I in accordance with the specified methods and frequencies. The Discharger shall collect, preserve, and transport groundwater samples in accordance with the Sample Collection and Analysis Plan approved by the Assistant Executive Officer.

MONITORING AND REPORTING PROGRAM R5-2015-0067 LONGVIEW PRODUCTION COMPANY SURFLUH LEASE RAISIN CITY OIL FIELD FRESNO COUNTY

INFLUENT MONITORING

Produced water samples shall be collected at a point in the system before discharge to the ponds. Time of collection of the sample shall be recorded. The collected produced water samples shall be analyzed for the parameters and constituents listed in Table I in accordance with the specified methods and frequencies. The Discharger shall collect, preserve, and transport produced water samples in accordance with the approved Sample Collection and Analysis Plan.

The Discharger shall record the volume of wastewater discharged to the ponds monthly. The wastewater volumes shall be reported in the quarterly monitoring reports.

FACILITY MONITORING

Permanent markers shall be in place with calibrations indicating the water level at design capacity and available operational freeboard. The freeboard shall be monitored on all ponds to the nearest tenth of a foot **monthly**.

Annually, prior to the anticipated rainy season, but **no later than 30 September**, the Discharger shall conduct an inspection of the facility. The inspection shall assess repair and maintenance needed for: drainage control systems; slope failure; groundwater monitoring wells, or any change in site conditions that could impair the integrity of the waste management unit or precipitation and drainage control structures; and shall assess preparedness for winter conditions including, but not limited to, erosion and sedimentation control. The Discharger shall take photos of any problems areas before and after repairs. Any necessary construction, maintenance, or repairs shall be **completed by 31 October**. Annual facility inspection reporting shall be **submitted by 30 November**.

The Discharger shall inspect all precipitation, diversion, and drainage facilities for damage within 7 days following major storm events (e.g., a storm that causes continual runoff for at least one hour) capable of causing flooding, damage, or significant erosion. The Discharger shall take photos of any problems areas before and after repairs. Necessary repairs shall be completed within 30 days of the inspection. Notification and reporting requirements for major storm events shall be conducted as required in Reporting Requirements 2. of this MRP.

The Discharger shall monitor and record on-site rainfall data using an automated rainfall gauge. Data shall be used in establishing the severity of storm events and wet seasons for comparison with design parameters used for waste management unit design and conveyance and drainage design. Daily data and on-site observation shall be used for establishing the need for inspection and repairs after major storm events. Rainfall data shall be reported in the quarterly monitoring reports as required by this MRP.

FRESNO COUNTY

REPORTING REQUIREMENTS

- 1. The Discharger shall report all monitoring data and information as specified herein. Reports that do not comply with the required format will be **REJECTED** and the Discharger shall be deemed to be in noncompliance with this Monitoring and Reporting Program.
- 2. Quarterly groundwater monitoring and remediation system reports shall be submitted to the Central Valley Water Board according to the schedule below.

Monitoring Period	Report Due
January – March	April 30
April – June	July 31
July – September	October 31
October – December	January 31

Each quarterly report shall include the following minimum information:

- (a) a description and discussion of the groundwater sampling event and results, including trends in the concentrations of waste constituents and groundwater elevations in the wells. If there are any deficiencies during the sampling event or if impacts to groundwater extend beyond recent historical boundaries, the report shall include an explanation and/or evaluation and propose options for addressing or correcting the deficiencies;
- (b) field logs that contain, at a minimum, water quality parameters measured before, during, and after purging, method of purging, depth of water, volume of water purged, etc.;
- (c) groundwater contour maps for all groundwater zones, if applicable;
- (d) waste constituent isoconcentration maps for all groundwater zones, if applicable;
- (e) a table showing well construction details that shall include, at a minimum, well number, groundwater zone being monitored, measuring point elevation, depth to top and bottom of screen, water level elevation, and depth to water;
- (f) cumulative data tables containing all historical water quality analytical results and depth to groundwater;
- (g) a copy of all laboratory analytical data reports;
- (i) results of any monitoring done more frequently than required at the locations specified in this Monitoring and Reporting Program or at other locations at the site shall be reported to the Central Valley Water Board;
- (j) a summary of any spills/releases that occurred during the quarter and tasks undertaken in response to the spills/releases;

MONITORING AND REPORTING PROGRAM R5-2015-0067 LONGVIEW PRODUCTION COMPANY SURFLUH LEASE RAISIN CITY OIL FIELD FRESNO COUNTY

- (k) an update and status on each of the outstanding tasks required by the CAO or Assistant Executive Officer;
- (I) a map showing all wells on the facility;
- 3. In reporting the monitoring data, the Discharger shall arrange the data in tabular form so that the date, the constituents, and the concentrations are readily discernible. The data shall be summarized to demonstrate compliance with the requirements. All data shall be submitted in an electronic form acceptable to the Assistant Executive Officer.
- 4. The Discharger shall submit an **annual report by 31 January** of each year for the preceding year. The report can be combined with the Discharger's fourth quarter report. The report shall contain:
 - a. Both tabular and graphical summaries of all data obtained during the year;
 - b. An in-depth evaluation of groundwater conditions at the site including short and longterm trends of the constituents of concern in each area of the site:
 - c. An evaluation of the effectiveness of the groundwater monitoring network in delineating the lateral and vertical extent of impacts to groundwater in all affected areas of the site. This needs to include an identification of any data gaps and potential deficiencies in the monitoring system or reporting program. The report shall include recommendations to address any deficiencies in the monitoring and report program;
 - d. An evaluation of the effectiveness of each of the remediation systems. The evaluation shall include the effectiveness of the systems in remediating impacted groundwater and each of the source areas or suspected source areas. The report shall include recommendations for improving or expanding the systems, if necessary:
 - e. A summary of the performance of each remediation system including the amount and percentage of operating and downtime, and the amount of petroleum hydrocarbons removed, if applicable; and
 - f. A summary of all spills/releases, if any, that occurred during the year, tasks undertaken in response to the spills, the results of the tasks undertaken.
- 5. For each required quarterly and annual report, one report shall be submitted containing all monitoring data collected at the site by the Discharger and include all information cited in the above sections. A hard copy of all required reports on/or responses shall be submitted by the due date unless otherwise arranged with Central Valley Water Board staff.
- 6. The Discharger may request that the Assistant Executive Officer change the monitoring frequency or constituents of concern after the first year of monitoring. The request needs to include a demonstration that adequate data has been collected to determine background groundwater conditions and a justification for the change.

FRESNO COUNTY

- 6. The Discharger shall maintain a data base containing historical and current monitoring data in an electronic form acceptable to the Assistant Executive Officer. The data base shall be updated quarterly and provided to the Central Valley Water Board in electronic format.
- 7. The Discharger shall submit electronic copies of all workplans, reports, analytical results, and groundwater elevation data over the Internet to the State Water Board Geographic Environmental Information Management System database (GeoTracker) at http://geotracker.swrcb.ca.gov. Electronic submittals shall comply with GeoTracker standards and procedures as specified on the State Water Board's web site. Uploads to Geotracker shall be completed on or prior to the due date. In addition, a hardcopy of each document shall be submitted to:

California Regional Water Quality Control Board Central Valley Region 1685 E Street, Suite 200 Fresno, CA 93706 Attn: Ron Holcomb

Geotracker Site ID: T1000006602

8. A transmittal letter explaining the essential points shall accompany each report. At a minimum, the transmittal letter shall identify any violations found since the last report was submitted, and if the violations were corrected. If no violations have occurred since the last submittal, this shall be stated in the transmittal letter. The transmittal letter shall also state that a discussion of any violations found since the last report was submitted, and a description of the actions taken or planned for correcting those violations, including any references to previously submitted time schedules, is contained in the accompanying report. The transmittal letter shall contain a statement identical to that required by the CAO by the discharger, or the discharger's authorized agent, under penalty of perjury, that to the best of the signer's knowledge the report is true, accurate, and complete.

The Discharger shall implement the above monitoring program on the effective date of this Program.

	Original signed by:
Ordered by:	
	PAMELA C. CREEDON, Executive Officer
	JUNE 5 2015
	00142 0 2010
	(Date)

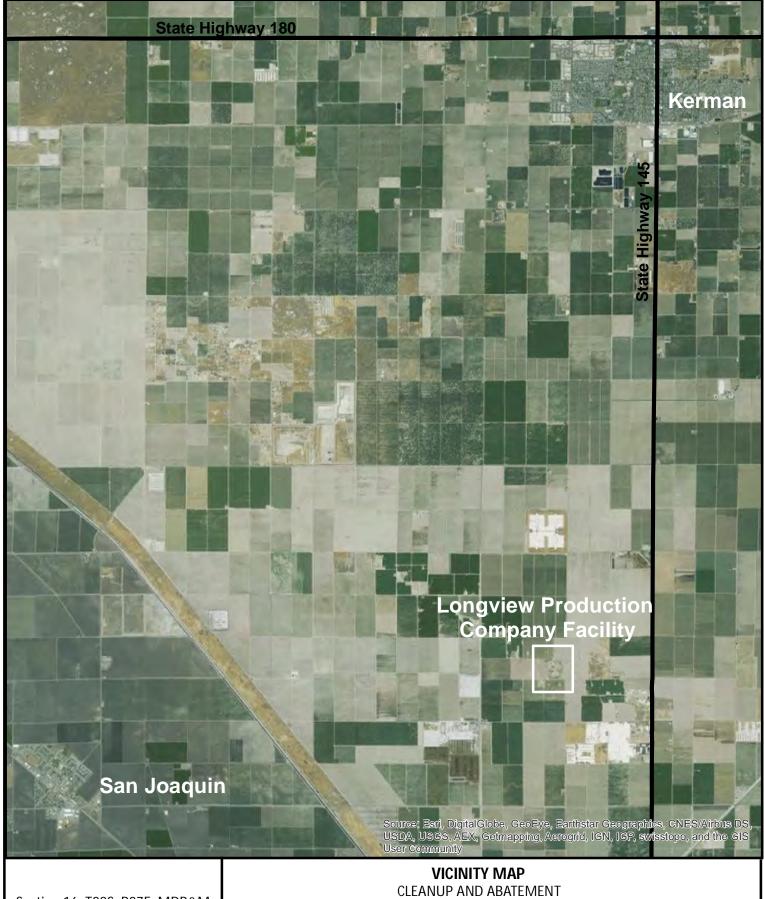
Table 1	Table 1 – Influent and Groundwater Monitoring									
<u>Parameters</u>	<u>Units</u>	Monitoring Frequency	US EPA or other Method	Reporting Frequency						
Groundwater Elevation	feet & hundredths, MSL ¹	Quarterly		Quarterly						
Field Parameters										
Temperature Electrical Conductivity pH	°F² umhos/cm³ pH units	Quarterly Quarterly Quarterly		Quarterly Quarterly Quarterly						
Monitoring Parameters										
Total Dissolved Solids (TDS) Electrical Conductivity Boron, dissolved	mg/l⁴ umhos/cm mg/l	Quarterly Quarterly Quarterly	160.1 120.1 6010B	Quarterly Quarterly Quarterly						
Standard Minerals										
Alkalinity as CaCO3 Bicarbonate Alkalinity as	mg/l	Quarterly	310.1	Quarterly						
CaCO3	mg/l	Quarterly	310.1	Quarterly						
Carbonate Alkalinity as CaCO3	mg/l	Quarterly	310.1							
Hydroxide Alkalinity as CaCO3	mg/l	Quarterly	310.1	Quarterly						
Sulfate , dissolved	mg/l	Quarterly	300.0	Quarterly						
Nitrate-N, dissolved Calcium, dissolved	mg/l	Quarterly Quarterly	300.0 6010B	Quarterly Quarterly						
Magnesium, dissolved	mg/l mg/l	Quarterly	6010B	Quarterly						
Sodium, dissolved	mg/l	Quarterly	6010B	Quarterly						
Potassium	mg/l	Quarterly	6010B	Quarterly						
Chloride	mg/l	Quarterly	300.0	Quarterly						
PAHs ⁵	ug/l ⁶	Quarterly	8270	Quarterly						
Total Petroleum Hydrocarbons (TPH)	ug/l	Quarterly	418.1	Quarterly						
Aromatic Hydrocarbons										
Benzene	ug/l	Quarterly	8260B	Quarterly						
Ethyl Benzene	ug/l	Quarterly	8260B	Quarterly						
Toluene	ug/l	Quarterly	8260B	Quarterly						

SURFLUH LEASE
RAISIN CITY OIL FIELD, FRESNO COUNTY

Table 1 – Influent and Groundwater Monitoring									
<u>Parameters</u>	<u>Units</u>	Monitoring Frequency	US EPA or other Method	Reporting Frequency					
M,p-Xylenes o-Xylene	ug/l ug/l	Quarterly Quarterly	8260B 8260B	Quarterly Quarterly					
Stable Isotopes Oxygen (¹⁸ O) Deuterium (Hydrogen 2, ² H, or D)	pCi/L ⁷	Quarterly Quarterly	900.0 900.0	Quarterly Quarterly					
Radionuclides Radium-226 Radium-228 Gross Alpha particle (excluding radon and	pCi/L pCi/L pCi/L	Quarterly Quarterly Quarterly	SM ⁸ 7500-Ra SM 7500-Ra SM 7110	Quarterly Quarterly Quarterly					
uranium) Uranium	pCi/L	Quarterly	200.8	Quarterly					
Constituents of Concern									
Lithium	mg/l	Quarterly	200.7	Quarterly					
Strontium	mg/l	Quarterly	200.7	Quarterly					
Iron Manganese	mg/l mg/l	Quarterly Quarterly	200.8 200.8	Quarterly Quarterly					
Antimony	mg/l	Quarterly	200.8	Quarterly					
Arsenic	mg/l	Quarterly	200.8	Quarterly					
Barium	mg/l	Quarterly	200.8	Quarterly					
Beryllium	mg/l	Quarterly	200.8	Quarterly					
Cadmium	mg/l	Quarterly	200.8	Quarterly					
Chromium (total)	mg/l	Quarterly	200.8	Quarterly					
Chromium (hexavalent)	mg/l	Quarterly	7196A	Quarterly					
Cobalt	mg/l	Quarterly	200.8	Quarterly					
Copper	mg/l	Quarterly	200.8	Quarterly					
Lead	mg/l	Quarterly	200.8	Quarterly					
Mercury	mg/l	Quarterly	7470A	Quarterly					

Table 1 – Influent and Groundwater Monitoring									
<u>Parameters</u>	<u>Units</u>	Monitoring Frequency	US EPA or other Method	Reporting Frequency					
Molybdenum	mg/l	Quarterly	200.8	Quarterly					
Nickel	mg/l	Quarterly	200.8	Quarterly					
Selenium	mg/l	Quarterly	200.8	Quarterly					
Silver	mg/l	Quarterly	200.8	Quarterly					
Thallium	mg/l	Quarterly	200.8	Quarterly					
Vanadium	mg/l	Quarterly	200.8	Quarterly					
Zinc	mg/l	Quarterly	200.8	Quarterly					

Mean Sea Level
 Degrees Fahrenheit
 Micromhos per centimeter
 Milligrams per liter
 Polycyclic aromatic hydrocarbons
 micrograms per liter
 Picocuries per liter
 Standard Methods



Section 16, T28S, R27E, MDB&M

0 3,150 6,300 12,600 Feet CLEANUP AND ABATEMENT
ORDER NO. XXXXXXXX
FOR
LONGVIEW PRODUCTION COMPANY
RAISIN CITY OIL FIELD, SURFLUH LEASE
KERN COUNTY

ATTACHMENT A



Section 16, T28S, R27E, MDB&M

0 45 90 180

Feet

CLEANUP AND ABATEMENT
ORDER NO. XXXXXXXX
FOR
LONGVIEW PRODUCTION COMPANY
RAISIN CITY OIL FIELD, SURFLUH LEASE
KERN COUNTY

ATTACHMENT B



Central Valley Regional Water Quality Control Board

27 March 2015

NOTICE OF VIOLATION

Dennis W. Hurt Longview Production Company 7775 South Madera Avenue Kerman. CA 93630 CERTIFIED MAIL 7014 2870 0000 7593 4849

INSPECTION REPORT - LONGVIEW PRODUCTION COMPANY, SURFLUH LEASE, RAISIN CITY OIL FIELD, FRESNO COUNTY

Central Valley Regional Water Quality Control Board (CVRWQCB) staff (Staff) inspected the Surfluh Lease in the Raisin City Oil Field on 4 February 2015 to ascertain the status of one surface impoundment (pond) identified by the California Division of Oil, Gas, and Geothermal Resources (DOGGR) as inactive. Disposal operations at the facility are not regulated by Waste Discharge Requirements (WDRs) and a Report of Waste Discharge has not been received. Staff's comments are presented in the enclosed inspection report.

Staff observed one unlined, pond being used for evaporation and percolation of wastewater from oil production operations. The pond was neither fenced nor netted. Staff collected one wastewater sample from pond and submitted it to a certified laboratory for analysis of general minerals and volatile organic compounds.

Analytical results of the wastewater sample indicate that Longview Production Company discharged oil field produced wastewater with waste constituent concentrations in excess of maximum electrical conductance, chloride, and boron concentration limits contained in the *Water Quality Control Plan for the Tulare Lake Basin*, Second Edition, revised January 2004 (Basin Plan), Discharge to Land, Oil filed Wastewater section. Basin Plan limits are an EC of 1,000 microsiemens per centimeter (µS/cm), chloride of 200 milligrams per liter (mg/L), and boron of 1 mg/L. The discharge of wastewater to the pond occurred without the submission of a RWD is a violation of 13230(a) of the CWC. The unauthorized wastewater discharge to the ground needs to cease upon receipt of this NOV. Any discharges are subject to enforcement pursuant to CWC Section 13350, and potential liability up to \$10 for each gallon discharged or \$5,000 for each day that the discharge occurs.

There were pools of crude oil throughout the tank farm containment area east of the pond location. The oil impacted soil needs to be cleaned up.

KARL E. LONGLEY SCD, P.E., CHAIR | PAMELA C. CREEDON P.E., BCEE, EXECUTIVE OFFICER

If Longview Production Company intends to retain the pond for the discharge of wastes or use the pond during maintenance or other upset conditions, a Report of Waste Discharge (RWD), along with the appropriate filing fee, needs to be submitted for issuance of WDRs. The discharge of wastes to a pond without WDRs, or before 140 days following a determination that the submitted RWD is complete and adequate, is a violation of Section 13260 of the California Water Code (CWC). The RWD needs to include a demonstration that the California Environmental Quality Act (CEQA) has been satisfied. A violation of 13260(a) of the CWC may subject Longview Production Company to potential liability pursuant to CWC Section 13350 or 13261, in an amount up to \$10 for each gallon discharged or \$5,000 for each day that the discharge occurs, and/or up to \$1,000 for each day the RWD is not submitted.

If you have any questions regarding this inspection, please contact Alejandra Lopez at (559) 445-6071 or by email at <u>Alejandra Lopez@waterboards.ca.gov</u>

DANE S. JOHNSON

Senior Engineering Geologist Professional Geologist No. 4239

Enclosure: Inspection Report

Laboratory Analytical Results

cc: Tim Boardman, California Division of Oil Gas and Geothermal Resources, Coalinga California Department of Fish and Wildlife, Fresno

OFFICE		FACILITIES INS	DECTION -	DISCHLND	1/4
A170	WDID 400311	REPOR		PROGRAM 550202	PAGE NO.
N/A	400311 REG MEASURE ID	REPUR	<u>-</u>	PARTY ID	813689 PLACE ID
ORDER NO.	REG MEASURE ID				
LONG	VIEW PRODUCTION CO	MPANY	RAIS	IN CITY, SURFLU	Н
	DISCHARGER NAME			FACILITY NAME	
77	75 SOUTH MADERA AVE	NUE	SE 1/4, NE 1/4, OF SE	<u>ECTION 14, T15S,</u>	R17E, MDB&M
	STREET ADDRESS			STREET ADDRESS	
	KERMAN, CA 93630			N, FRESNO COU	NTY
	CITY, STATE, ZIP CODE		С	ITY, STATE, ZIP CODE	
	DENNIS W. HURT			ERT RICHARDSO	N
	DISCHARGER CONTACT PERSON			ILITY CONTACT PERSON	
(559) 567-6034			559) 217-8775	rrichardson@long	
TELEPHONE NO.		ADDRESS	TELEPHONE NO.	E-MAIL F	ADDRESS
		NERAL INSPECTION			
spection Type:	A Type Compliance Inspec			I Inspector: Alejar	ndra Lopez
2/04/2015 to _	· · · · · · · · · · · · · · · · · · ·	0 - 1030 Humid cool a	nd fog is clearing		
INSPECTION	DATE(S) INSPEC	CTION TIME	GENERAL WE	ATHER CONDITIONS	
		INSPECTION ATTE	NDEE(S)		•
Alejandra	Lopez Re	egional Water Board	(559) 445-6071	Aleiandra.Lo	pez@waterboards.ca.gov
NAME		COMPANY/AGENCY	TELEPHONE NO.		MAIL ADDRESS
Robert Rich	nardson Long	view Production Company	(559) 217-8775	rrichardso	n@longviewgas.com
NAME		COMPANY/AGENCY	TELEPHONE NO.	E.	MAIL ADDRESS
NAME		COMPANY/AGENCY	TELEPHONE NO.	E	MAIL ADDRESS
	NSPECTION SUMM	MADV (for CIVALOS A	ntry 500 char	otor movimu	· · ·
	owed), low berm, waste				arded to land (oil
		water limits exceeded, n		stewater unautho	arged to land (oil orized discharge to
	INSPECTION INSPECTION IN TAIL IN	ON VIOLATIONS SI	o freeboard, and wa JMMARY (if app documented entered into	licable)	orized discharge to
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pe, describe violati	noted during inspection in ta ion, and identify section of the Violation Type	ON VIOLATIONS SI ble below. For each violation WDRs or Water Code violate	o freeboard, and wa JMMARY (if app documented entered into d. plation Description	licable) CIWQS, identify Viol	orized discharge to
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FACILITIES INSPECTION REPORT LONGVIEW ENERGY COMPANY SURFLUH LEASE, RAISIN CITY OIL FIELD

FACILITY INFORMATION

Discharge to a previously closed unlined pond depression area.	Active
FACILITY DESCRIPTION (e.g., total area in acres, number of waste management units, etc.)	STATUS (active, inactive, closed)
Oil field production wastewater (produced water).	Oil/Gas Extraction
WASTE TYPES	FACILITY CLASSIFICATION
Produced water is disposed of into a depression at a previously closed pond site.	
DISPOSAL DESCRIPTION (e.g. composting landfill surface impoundment etc.)	

GIS Equipment used:

BACKGROUND

Pond was closed on 5 September 2001 under a different operator. This is the first inspection under Longview Energy Company as operator. According to DOGGR all Raisin City wells belonging to Golden Exploration and Production Corp. were transferred to Longview Production Company on 1 November 2004.

INSPECTION GIS DATA

MANUFAC	TURER	MODEL	SERIAL N	O. DATUM
Description of Measured Point	Latitude	Longitude	Datum	Comments
Closed pond depression	36.62782	-120.08127	WGS84	Active discharge

INSPECTION OBSERVATIONS AND FINDINGS

Describe observations and findings and identify those that document and reference each violation listed in the Inspection Violations Summary table by identifying the cited violation number within parentheses following the observation/finding (e.g., Exposed waste on top deck (V1)).

The site was inspected to ascertain the status of one unlined, pond identified by DOGGR as inactive. Discharge of produced wastewater at the facility is not regulated by WDRs. The lease is discharging wastewater to an unlined depression located in the closed pond area. Photos were taken to document observed conditions (See Page 4).

The pond contained produced wastewater and was neither netted nor fenced (See Attachment 1 for a vicinity map showing pond location). Pond dimensions are approximately 70 feet by 60 feet and one foot deep (Photo 1). One wastewater sample was collected from the pond and submitted to a certified laboratory for analysis of general minerals and volatile organic compounds (VOCs). There were erosional features from the discharge point leading to the pond (Photo 2). The discharge area had what appear to be saline precipitates (Photo 4). The discharge area is overlain by several pipe joints and there are two open pipes in the ground.

Mr. Richardson mentioned that water accumulation in the pond was all rainwater from the tank containment area. According to wunderground.com the cumulative rain fall in the months of December was 2.88 inches, in January it was 0.03 inches, and the days leading to the inspection in February no rain fell in Kerman, California. When observing the elevation of the source at the top of the erosional channel it was noted that precipitation follows the path of least resistance from high to low areas. Any rain water accumulation in the tank containment area would not drain to the pond as there is a slight elevation increase between the pond and the tank area. In addition the slight amber color of the wastewater in the pond appears characteristic of oil production wastewater discharged to ponds.

Approximately 680 feet east of the pond location, Staff observed a large oil spill within the five tank containment area (See Page 5). Mr. Richardson mentioned that one of the oil stock tanks had overflowed and that the oil spill had been discovered in the morning. The berm to the containment area had been torn down in a section to allow heavy machinery to enter and pour fresh soil over the oil pools that extended throughout the containment area. There was a hole at the base of the berm wall in the east side of the containment area. No evidence was observed of the oil spill leaving the containment area. Fresh soil had been sprinkled throughout the containment area, yet there were lots of oil pools remaining during the inspection (Photos 5 through 10).

I mentioned to Mr. Richardson that unauthorized discharges had to be reported to the appropriate agencies. For specific rules and regulations on spill reporting procedures please refer to the "California Hazardous Materials Spill / Release Notification guidance" by California Office of Emergency Services, February 2014.

FACILITIES INSPECTION REPORT LONGVIEW ENERGY COMPANY SURFLUH LEASE, RAISIN CITY OIL FIELD

SAMPLING INFORMATION AND OBSERVATIONS

Were sar	mples collected during the inspection	Yes 🗌 No	Are sample results included	in report? X Yes	□ No
Did disch	narger collect split samples?	☐ Yes No			
	SAMPLE	COLLECTION INFORM	IATION AND OBSERVAT	TIONS	
ÁL1504	402-6 Pond waste	water	0940	1	
	SAMPLE ID	SAMPLE DESCRIPTION/OBSE	ERVATIONS	SAMPLE TIME (hours)	PHOTO NO.
	SAMPLE ID	SAMPLE DESCRIPTION/OBSE	`	SAMPLE TIME (hours)	PHOTO NO.
		DISCUSSION OF SAI	***************************************		
	sampling results (e.g., discuss whether				
	water analysis of one sample ed for general minerals and Vo		from the pond was subm	litted to a certified is	aboratory and
milligra benzer constitu Facility to surfa	e analytical results were: elams per liter (mg/L); chloride ne, toluene, ethylbenzene, and uent concentrations. wastewater contains EC, chloride ace impoundments contained by 2004 (Basin Plan).	was detected at 15,00 l xylenes, (BTEX) were a pride, and boron concent	no mg/L; boron at 7.7 mall not detected, see attach	g/L; and sodium at ned analytical report able concentrations f	t 8,900 mg/L; for remaining for discharges
		CONCLU	JSIONS		
Summar	ize the conclusions of the inspection(s) below.			
1.	There is one un-lined pond to Disposal operations to the positions				/ater.
2.	Facility pond wastewater of concentrations that exceed the Water Quality Control Pl	allowable concentrations	s for disposal of oil field w	vastewater, which is	a violation of
3.	Oil spill impacted soil needs	to be cleaned up.			·
Note:	Inspection photographs follow	V			
	Attachments include: Attach	chment 1. Vicinity-Pond	Map	•	

Attachment 2. Analytical data Attachment 3. Precipitation log

PHOTOGRAPHS

Photo 1. North view of sump

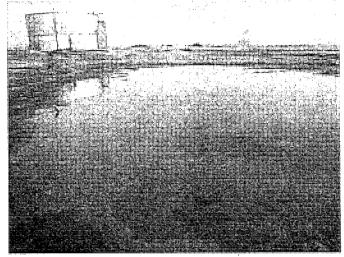


Photo 2. Wastewater erosional channels

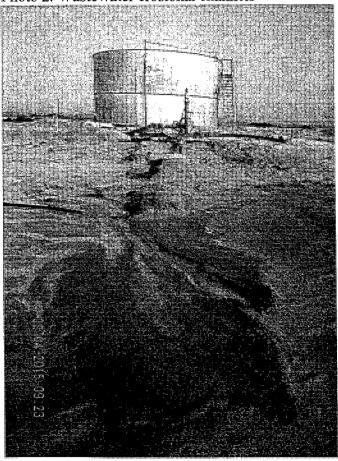
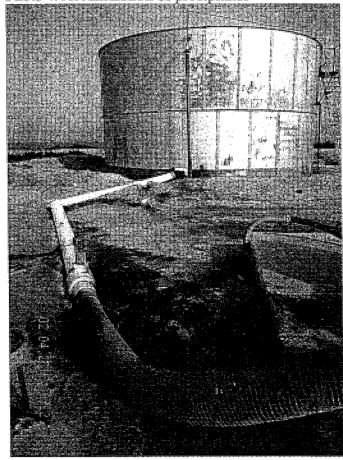


Photo 3. Erosion at discharge source



Photo 4. Accumulation of precipitates



FACILITIES INSPECTION REPORT LONGVIEW ENERGY COMPANY SURFLUH LEASE, RAISIN CITY OIL FIELD

Photo 5. Hole at base of berm, oil spill

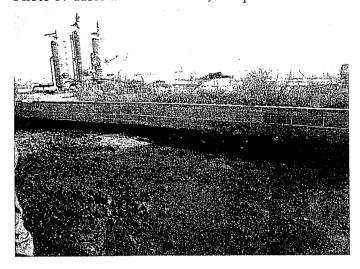


Photo 6. South view, containment berm removed

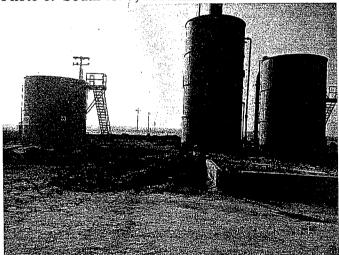


Photo 7. South view, west side of containment area

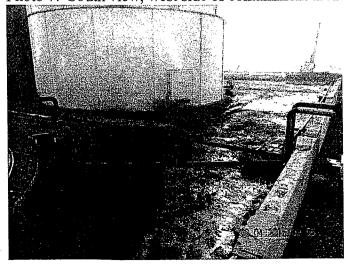


Photo 8. Oil spill splash zone

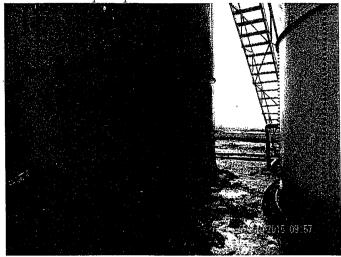


Photo 9. NW view, fresh soil over oil pools

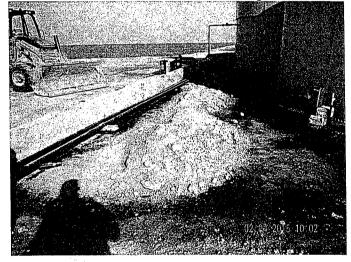


Photo 10. Oil pools at tank base



Site map

Inspection 4 February 2015

LONGVIEW ENERGY COMPANY SURFLUH LEASE, RAISIN CITY OIL FIELD SE 1/4, NE 1/4, OF SECTION 14, T15S, R17E, MDB&M



Aerial image date 4/13/2013

Site is unregulated. One unlined and not netted pond is used for disposal of wastewater. There appears to be no freeboard. Mr. Richardson claimed that the liquid in the pond was precipitation accumulation. According to Weather Underground there was no rain in the days leading to the inspection in February, there was a cumulative rain of 0.03 inches in January and 2.88 inches in December. It is highly unlikely that the water in the sum is rainwater. Pond sample analytical results were: electrical conductance (EC) 41,000 µS/cm; total dissolved solids (TDS) 27,000 milligrams per liter (mg/L); chloride was detected at 15,000 mg/L; boron at 7.7 mg/L; and sodium at 8,900 mg/L; benzene, toluene, ethylbenzene, and xylenes, (BTEX) were all not detected.

There were pools of crude oil in the containment area east of the pond. Fresh soil was sprinkled throughout the containment area, yet oil pools remain in some sections. Oil pools pose an entrapment threat to wildlife. Oil impacted soil need to be cleaned up.

Attachment 2



2527 Fresno Street Fresno, CA 93721 (559) 268-7021 Phone (559) 268-0740 Fax

California ELAP Certificate #1371

RWQCB - Fresno

Project: 13-014-150 .

1685 E Street

Project Number: Pyramid Hills Oil Field - DOGGR Sump List

Fresno CA, 93706-2007

Project Manager: Anthony Toto

Reported:

2/19/2015

AL150402-6

Surfluh

BB05002-05 (Waste Water)

Sampled:02/04/15 09:40

•											
Analyte	Flag	Result	Reporting Limit	MDL	Units	Dilution	Batch	Analyst	Prepared	Analyzed	Method
norganics											
Total Alkalinity as CaCO3		150	1.0	0.23	mg/L	1	U5B0514	CMG	2/5/15 16:01	2/5/15 19:38	SM2320B
Bicarbonate Alkalinity as HCO3		180	1.3	0.23	mg/L	1	U5B0514	CMG	2/5/15 16:01	2/5/15 19:38	SM2320B
Carbonate Alkalinity as CO3		ND	1.0	0.23	mg/L	1	U5B0514	CMG	2/5/15 16:01	2/5/15 19:38	SM2320B
Hydroxide Alkalinity as OH		ND .	1.0	0.23	mg/L	. 1	U5B0514	CMG	2/5/15 16:01	2/5/15 19:38	SM2320B
Cation/Anion Balance (% Difference)		4.2			%	1	U5B1817	JAA	2/18/15 17:00	2/18/15 17:01	SM 1030F
Chloride		15000	600	5.5	mg/L	300	U5B0517	ETH	2/5/15 17:35	2/7/15 7:54	EPA 300.0
Specific Conductance (EC)		41000	1.0	·0.26	μS/cm	1.	U5B0514	CMG	2/5/15 16:01	2/5/15 19:38	SM2510B
Nitrate as NO3		ND	100	0.88	mg/L	50	U5B0517	ETH .	2/5/15 17:35	2/5/15 21:06	EPA 300.0
Nitrite as N		ND	15	0.53	mg/L	50	U5B0517	ETH	2/5/15 17:35	2/5/15 21:06	EPA 300.0
Orthophosphate as P		ND	12	0.14	mg/L	50	U5B0517	ETH	2/5/15 17:35	2/5/15 21:06	EPA 300.0
Sulfate as SO4	J »	40	100	0.47	mg/L	50	U5B0517	ETH	2/5/15 17:35	2/5/15 21:06	EPA 300.0
Total Dissolved Solids		27,000	. 200	160	mg/L	20	U5B0901	MVY	2/9/15 8:09	2/10/15 13:10	SM 2540C
Metals - Totals											
Boron .	•	7.7	0.10	0.0017	mg/L	1	USB0509	DAR '	2/9/15 12:35	2/10/15 22:25	EPA 200.7
Calcium		960	100	7.6	mg/L	. 500	U5B0509	DAR	2/9/15 12:35	2/12/15 19:15	EPA 200.7
Hardness		3700	250		mg equiv. CaCO3/L	500	[CALC]	DAR	2/12/15 19:15	2/12/15 19:15	[CALC]
Iron		2.6	0.20	0.034	mg/L	1	U5B0509	DAR	2/9/15 12:35	2/10/15 22:25	EPA 200.7
Magnesium		320	0.20	0.018	mg/L	1	U5B0509	DAR	2/9/15· 12:35	2/10/15 22:25	EPA 200.7
Manganese		1.5	0.010	0.00035	mg/L	1	U5B0509	DAR	2/9/15 12:35	2/10/15 22:25	EPA 200.7
Potassium		100	2.0	0.15	mg/L	1	USB0509	DAR	2/9/15 12:35	2/10/15 22:25	EPA 200.7
Sodium .		8900	1000	260	mg/L	500	U5B0509	DAR	2/9/15 12:35	2/12/15 19:15	EPA 200.7
Volatile Organics				· · · · · ·			· ;				
Dichlorodifluoromethane (CFC-12)		ND	0.50	0.19	μ g/ L	1	U5B0912	DTH	2/9/15 13:30	2/9/15 20:30	EPA 8260B
Chloromethane	J	0.46	0.50	0.16	μg/L	1	U5B0912	DTH	2/9/15 13:30	2/9/15 20:30	EPA 8260B
Vinyl chloride		. ND	0.50	0.16	μ g /L	1	U5B0912	DTH	2/9/15 13:30	2/9/15 20:30	EPA 8260B
Bromomethane		ND	1.0	0.32	μ g/ L	1	U5B0912	DTH	2/9/15 13:30	2/9/15 20:30	EPA 8260B
Chloroethane		ND	0.50	0.16	μg/L	1	U5B0912	DTH	2/9/15 13:30	2/9/15 20:30	EPA 8260B
1,1-Dichloroethene		ND	0.50	0.14	μg/L	1	U5B0912	DTH	2/9/15 13:30	2/9/15 20:30	EPA 8260B
Carbon disulfide	/	·ND	0.50	0.14	μg/L	1	U5B0912	DTH	2/9/15 13:30	2/9/15 20:30	EPA_8260B
Acrolein	•	ND	10	1.5	μg/L	1	U5B0912	DTH	2/9/15 13:30	2/9/15 20:30	EPA 8260B
Methylene chloride		ND	1.0	0.20	μg/L	· 1	U5B0912	2 DTH	2/9/15 13:30	2/9/15 20:30	EPA 8260B
trans-1,2-Dichloroethene		ND	0.50	0.11	μg/L	1	U5B0912	2 DTH	2/9/15 13:30	2/9/15 20:30	EPA 8260B



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California ELAP Certificate #1371

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1685 E Street

Project Number: Pyramid Hills Oil Field - DOGGR Sump List

Fresno CA, 93706-2007

Project Manager: Anthony Toto

Reported: 2/19/2015

AL150402-6

BB05002-05 (Waste Water)

Sampled:02/04/15 09:40

Analyte	Flag	Result	Reporting Limit	MDL	Units	Dilution	Batch	Analyst	Prepared	Analyzed	Method
Volatile Organics											· · · · · ·
Methyl tert-Butyl Ether (MTBE)		ND	1.0	0.36	μ g/ L	1	U5B0912	DTH .	2/9/15 13:30	2/9/15 20:30	EPA 8260B
1,1-Dichloroethane		ND	0.50	0.12	μ g/ L	1	U5B0912	DTH	2/9/15 13:30	2/9/15 20:30	EPA 8260B
Acrylonitrile		ND	5.0	2.9	μ g/ L	1 .	U5B0912	DTH	2/9/15 13:30	2/9/15 20:30	EPA 8260B
cis-1,2-Dichloroethene		ND	0.50	0.15	μg/L	1	U5B0912	DTH	2/9/15 13:30	2/9/15 20:30	EPA 8260B
2,2-Dichloropropane	•	ND	1.0	0.24	. μ g/L	. 1	U5B0912	DTH	2/9/15 13:30	2/9/15 20:30	EPA 8260B
Bromochloromethane		ND	0.50	0.20	μ g/ L	1	U5B0912	DTH	2/9/15 13:30	2/9/15 20:30	EPA 8260B
Chloroform		ND.	0.50	0.14	μ g/ L	1	U5B0912	DTH .	2/9/15 13:30	2/9/15 20:30	EPA 8260B
Carbon tetrachloride		ND	0.50	0.16	μg/L	- 1	U5B0912	DTH	2/9/15 13:30	2/9/15 20:30	EPA 8260B
1,1,1-Trichloroethane (TCA)		ND	0.50	0.16	μ g/ L	1	U5B0912	DTH	2/9/15 13:30	2/9/15 20:30	EPA 8260B
1,1-Dichloropropene		ND	0.50	0.12	.μ g/ L	1	U5B0912	DTH	2/9/15 13:30	2/9/15 20:30	EPA 8260B
Benzene		ND	0.50	0.10	μ g/ L	İ	U5B0912	DTH .	2/9/15 13:30	2/9/15 20:30	EPA 8260B
1,2-Dichloroethane (1,2-DCA)		ND	0.50.	0.10	μg/L	. 1	U5B0912	DTH	2/9/15 13:30	2/9/15 20:30	EPA 8260B
Trichloroethene (TCE)		ND	0.50	0.17	μg/L	1	U5B0912	DTH	2/9/15 13:30	2/9/15 20:30	EPA 8260B
Dibromomethane		ND	0.50	0.14	μg/L	. 1	U5B0912	DTH	2/9/15 13:30	2/9/15 20:30	EPA 8260B
1,2-Dichloropropane		ND	0.50	0.10	μ g /L	1	U5B0912	ЫH	2/9/15 13:30	2/9/15 20:30	EPA 8260B
Bromodichloromethane		ND ·	0.50	0.13	μ g/ L	, 1	U5B0912	DTH	2/9/15 13:30	2/9/15 20:30	EPA 8260B
cis-1,3-Dichloropropene		ND	0.50	0.11	μ g/ L	1	U5B0912	DTH	2/9/15 13:30	2/9/15 20:30	EPA 8260B
Toluene		ND	0.50`	0.27	μg/L	1	. U5B0912	DTH	2/9/15 13:30	2/9/15 20:30	EPA 8260B
trans-1,3-Dichloropropene		.ND	0.50	0.14	μ g/ L	1	U5B0912	DTH	2/9/15 13:30	2/9/15 20:30	EPA 8260B
Tetrachloroethene (PCE)		. ND	0.50	0.12	μg/Ļ	1	U5B0912	DTH	2/9/15 13:30 ·	2/9/15 20:30	EPA 8260B
Dibromochloromethane		ND	0.50	0.11	μg/L	. 1	U5B0912	DTH	2/9/15 13:30	2/9/15 20:30	EPA 8260B
1,3-Dichloropropane		ND	0.50	0.10	μg/L	. 1	U5B0912	DTH	2/9/15 13:30	2/9/15 20:30	EPA 8260B
1,2-Dibromoethane (EDB)		ND	0.50	. 0.22	μ g/ L	1	U5B0912	DTH	2/9/15 13:30	2/9/15 20:30	EPA 8260B
Ethylbenzene		ND	0.50	0.10	μg/L	1	U5B0912	DTH	2/9/15 13:30	2/9/15 20:30	EPA 8260B
Chlorobenzene		ND	0.50	0.10	μg/L	1	U5B0912	DTH	2/9/15 13:30	2/9/15 20:30	EPA 8260B
1,1,1,2-Tetrachloroethane		ND	0.50	0.12	μ g /L	1	Ų5B0912	DTH	2/9/15 13:30	2/9/15 20:30	EPA 8260B
m,p-Xylene		ND	1.0	0.20	μ g /L	1 .	U5B091	DTH	2/9/15 13:30	2/9/15 20:30	EPA 8260B
o-Xylene		ND	0.50	0.10	μ g /L	1	_ U5B091	2 DTH	2/9/15 13:30	2/9/15 20:30	EPÁ 8260B
Bromoform		ND	1.0	0.12	μ g /L	1	U5B091	2 DIH	2/9/15 13:30	2/9/15 20:30	EPA 8260B
Isopropylbenzene	•	ND	1.0	0.10	μg/L	. 1	U5B091	2 DTH	2/9/15 13:30	2/9/15 20:30	EPA 8260B
Bromobenzene	, ,	ND	0.50	0.10	μg/L	1	. U5B091	2 DTH	2/9/15 13:30	2/9/15 20:30	EPA 8260B
n-Propylbenzene		ND	1.0	0.10	μg/L	1	U5B091	2 DTH	2/9/15 13:30	2/9/15 20:30	EPA 8260B
1,3,5-Trimethylbenzene		ND	0.50	0.11	μg/L	1	U5B091	2 DTH	2/9/15 13:30	2/9/15 20:30	ÉPA 8260B
2-Chlorotoluene		ND.	0.50	0.10	μg/L	1	U5B091		2/9/15 13:30	2/9/15 20:30	EPA 8260B

Moore Twining Associates, Inc.

Juliane Adams, Director of Analytical Chemistry

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.



2527 Fresno Street Fresno, CA 93721 (559) 268-7021 Phone (559) 268-0740 Fax

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RWQCB - Fresno

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1685 E Street

Project Number: Pyramid Hills Oil Field - DOGGR Sump List

Fresno CA, 93706-2007

Project Manager: Anthony Toto

Reported: 2/19/2015

AL150402-6

BB05002-05 (Waste Water)

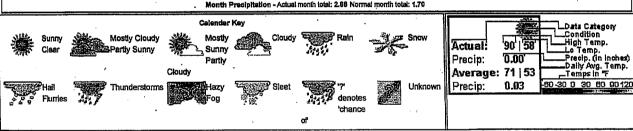
Sampled:02/04/15 09:40

			D - 1-45-								
Analyte	Flag	Result	Reporting Limit	MDL	Units	Dilution	Batch	Analyst	Prepared	Analyzed	Method
Volatile Organics										· · · · · · · · · · · · · · · · · · ·	
1,2,3-Trichloropropane (123TCP)		ND	0.50	0.29	μg/L ·	1	U5B0912	DTH	2/9/15 13:30	2/9/15 20:30	EPA 8260B
4-Chlorotoluene		ND	0.50	0.10	μg/L	. 1	U5B0912	DÏH	2/9/15 13:30	2/9/15 20:30	EPA 8260B
tert-Butylbenzene		ND	1.0	0.10	μg/L	1	U5B0912	DTH	2/9/15 13:30	2/9/15 20:30	EPA 8260B
1,2,4-Trimethylbenzene		ND	1.0	0.10	μg/L	1	U5B0912	DTH	2/9/15 13:30	2/9/15 20:30	EPA 8260B
sec-Butylbenzene		ND	0.50	0.10	· μg/L	. 1	U5B0912	DTH	2/9/15 13:30	2/9/15 20:30	EPA 8260B
p-Isopropyltoluene		ND	1.0	0.10	μg/L	1	U5B0912	DTH	2/9/15 13:30	2/9/15 20:30	EPA 8260B
1,3-Dichlorobenzene		ND	0.50	0.040	μg/L	1	: U5B0912	DTH	2/9/15 13:30	2/9/15 20:30	EPA 8260B
1,4-Dichlorobenzene		ND	0.50	0.10	μg/L	1	U5B0912	DTH	2/9/15 13:30	2/9/15 20:30	EPA 8260B
n-Butylbenzene		NĎ	0.50	0.13	μg/L	1 .	U5B0912	DTH	2/9/15 13:30	2/9/15 20:30	EPA 8260B
1,2-Dichlorobenzene		ND	0.50	0.12	μg/L	1	U5B0912	DTH	2/9/15 13:30	2/9/15 20:30	EPA 8260B
1,2-Dibromo-3-chloropropane (DBCP)		ND	5.0	0.39	μg/L	1	U5B0912	DIH	2/9/15 13:30	2/9/15 20:30	EPA 8260B
1,2,4-Trichlorobenzene		ND	1.0	0.10	μg/L	·, 1	U5B0912	DTH	2/9/15 13:30	2/9/15 20:30	EPA 8260B
Hexachlorobutadiene		ND	1.0	0.10	μg/L	1	U5B0912	DTH	2/9/15 13:30	2/9/15 20:30	EPA 8260B
Naphthalene		ND	0.50	0.15	μg/L	1	U5B0912	DTH	2/9/15 13:30	2/9/15 20:30	EPA 8260B
1,2,3-Trichlorobenzene	-	ND	0.50	0.10	μg/L	. 1	U5B0912	DTH	2/9/15 13:30	2/9/15 20:30	EPA 8260B
Surrogate: 4-Bromafluorobenzene	•	100 %	. 70-130	•		,	U5B0912		2/9/15 13:30	2/9/15 20:30	EPA 8260B
Surrogate: Dibromofluoromethane		119%	70-130				U5B0912		2/9/15 13:30	2/9/15 20:30	EPA 8260B
Surrogate: Toluene-d8	•	107%	70-130				U5B0912		2/9/15 13:30	2/9/15 20:30	EPA 8260B

Notes and Definitions

MS1	Recovery for this analyte was affected by matrix.	
J .	Detected but below the Reporting Limit; therefore, result is an estimated concentration (CLP J-Flag). Same as DNQ Quantified.	- Detected, but Not
BS3	Recovery for this analyte was biased high. Associated samples were ND.	
ug/L	micrograms per liter (parts per billion concentration units)	· · ·
mg/kg	milligrams per kilogram (parts per million concentration units)	
mg/L	milligrams per Liter (parts per million concentration units)	
ND	Analyte NOT DETECTED at or above the Minimum Detection Limit (MDL)	
RPD	Relative Percent Difference	

< Previo	us Month	*2	2013				2015 »		Next Month:				
Sunday		Monday		Tuesday Wednesday .				Thursday		Friday		Saturday	
		1	*	2		3		4		5	*	<u>6</u>	
		Actual:	74 48	Actual:	61 48	Actual:	75 57	Actual:	89 56	Actual:	66 54	Actual:	73 53
		Precip:	0.00	Precip:	0,49	Precip:	0,03	Precip:	0.02	Precip:	0.00	Predp:	т
	ļ	Average:	58 37	Average:	58 37	Average:	57 37	Average:	57 37	Average:	57 37	Average:	56 37
		Precip:	0.02	Precip:	0.03	Precip:	0.04	Precip:	0.03	Precip;	0.04	Predp:	0.04
Z		8		2		10		11		12		13	
Actual:	68 47	Actual:	67 39	Actual:	54 48	Actual:	58 60	Actual:	65 51	Actual:	52 48	Actual:	55 45
Precip:	0,00	Precip:	0.00	Precip:	0.00	Precip:	0.00	Precip:	0.22	Precip:	1.32	Precip:	0.00
Average:	56 37	Average:	56 37	Average:	56 36	Average:	55 36	Average:	55 38	Average:	55 36	Average:	55 36
Precip:	0.05	Precip:	0.04	Precip:	0.04	Precip:	0.05	Precip:	0.04	Precip:	0.05	Predp:	0.05
14	PE	<u>15</u>		<u>16</u>		17		18		19		<u>20</u>	
Actual:	53 42	Actual:	55 42	Actual:	63 44	Actual:	58 46	Actual:	61 45	Actual:	58 41	Actual:	62] 51
Precip:	0.00	Precip:	0.26	Precip:	0.31	Precip:	0.18	Precip:	0.00	Precip:	0.03	Precip:	0.01
Average:	54 36	Average:	54 36	Average:	54 36	Average:	54 36	Average:	54 36	Average:	53 36	Average:	53 36
Precip:	0.05	Precip:	0.08	Precip:	0.07	Precip:	0.06	Precip:	0.06	Precip:	0.06	Precip:	0.07
21		, <u>22</u>		23		24		25		26	**	27.	*
Actual:	62 48	Actual:	61 49	Actuel:	65 42	Actual:	60 46	Actual:	86 36	Actual:	53 31	Actual:	56 30
Precip:	0.00	Precip:	0.01	Precip:	0.00	Precip:	т .	Precip:	0.00	Precip;	0.00	Precip:	0.00
Average:	53 38	Average:	53 [36	Average:	53 36	Average:	53 36	Average:	- 63 38	Average:	53 36	Average:	62 36
Predip:	0.06	Precip:	0.07	Precip:	0.08	Precip:	0.07	Precip:	0.07	Precip:	0.06	Precip:	80.0
28		29		<u>30</u>		<u>31</u>	**					•	
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No precipitation Feb. 1 through Feb. 4