

Anthony J. Klein
Thomas V. DeNatale, Jr.
Barry L. Goldner
Jay L. Rosenlieb
David J. Cooper
Claude P. Kimball, L.L.M. (Ret.)
William A. Bruce
Ned E. Dunphy
Leonard K. Welsh
Kevin C. Findley, L.L.M.
T. Scott Belden
Timothy G. Scanlon
Kenneth A. Holland
Nancy L. Oehler, L.L.M. **
Jennifer A. Adams
Suelen H. Anderson
Catherine E. Bennett
David D. Blaine
Craig D. Braun
James M. Duncan*
Thomas C. Fallgatter
José A. Guetrero
Joseph D. Hughes
Krustyna L. Jamieson
Paul Lafranchise, L.L.M.
Gary Logan



**KLEIN DENATALE GOLDNER
COOPER ROSENLIB & KIMBALL LLP**

ATTORNEYS AT LAW

Dennis Mullins
Jean M. Pledger
Ryan D. Bright
Lynne Johnson Carrithers
Tenielle E. Cooper
Dustin S. Dodgin
Jacob L. Eaton
Terrence T. Eglund
Elizabeth Estrada
Andrew Heglund
Lisa Holder
Herrin Hopper
Steven J. Lee
Joshua D. Meier
Alyssa Nieto
Jeffrey W. Noe
Laura Olivier
Katy C. Raytis
T. Alan Rogers
Heather J. C. Stanley***
L. Richard Walton, L.L.M. F
Lewis R. Walton, L.L.M.
Laura M. Williams
OF COUNSEL
Bruce F. Bunker (Ret.)
Mel Ehrlich

May 18, 2007

VIA E-MAIL AND CERTIFIED MAIL RETURN

W. Dale Harvey
Central Valley Regional
Water Quality Control Board
1685 E Street
Fresno, CA 93706-2020

Re: Valley Waste and Cawelo Water District
Draft Waste Discharge Requirements
(NPDES No. CA 0081311)

Dear Mr. Harvey:

I am writing on behalf of my client, Vintage Production California LLC (Vintage), a wholly-owned subsidiary of Occidental Petroleum Corporation. We appreciate the opportunity to comment on the revised version of the Waste Discharge Requirements for Valley Waste Disposal Company (Valley Waste) and Cawelo Water District (NPDES No. CA 008131). As you know, Vintage discharges oil field waste water to Valley Waste and requested an increase in maximum daily flow from 4.3 mgd under the prior permit to 7.4 mgd.

The proposed permit will meet Vintage's anticipated production needs, and we appreciate the staff's consideration and effort. After further discussion with Valley Waste, Vintage has the following comments.

00427668.000.DOC

*Registered Patent Attorneys
** Certified Specialist - Estate Planning, Trust & Probate Law
*** Certified Specialist - Family Law
The State Bar of California Board of Legal Specialization
† Certified Public Accountant (De)

Dale Harvey
May 18, 2007
Page 2

EC Metering Requirements

Condition 7 in the proposed order requires the installation of continuous flow and Electrical Conductivity (EC) meters by June 5, 2007. As you know, the EC meter is on site and will be fully operational by this deadline. However, Valley Waste has installed similar equipment in the past and experienced significant operational problems. In fact, your staff approved the use of daily grab samples as an alternative to the continuous EC metering to demonstrate compliance with the prior permit issued in 1996 for this reason. As we understand it, other companies have experienced similar operational problems with these meters. Therefore, we ask that the staff include daily grab sampling as an alternative compliance method in the permit should Valley Waste experience operational problems with the new EC meter.

Acute Toxicity Testing

The proposed Monitoring and Reporting Program requires chronic toxicity testing for three species (*Pimphales promelas*, *Ceriodaphnia dubia*, and *Selenastrum capricornutum*) twice per year. The 1996 permit required chronic toxicity testing of a vertebrate, invertebrate and plant species only once during the life of the permit, and the results demonstrated compliance with the applicable receiving water limitations. In light of the significant cost of this testing, we request that the staff reduce this requirement to twice during the life of the permit. In the unlikely event that Valley Waste's discharge fails to comply with applicable receiving water limitations, Valley Waste and Cawelo Water District would perform whatever additional testing and monitoring that the Water Board might require.

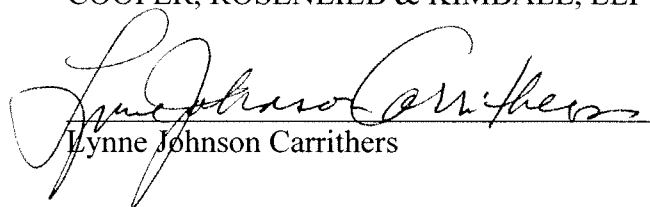
Priority Pollutant Monitoring

The Monitoring and Reporting Program also requires priority pollutant monitoring on an annual basis. The 1996 permit did not require priority pollutant monitoring. While Vintage does not oppose these additional testing requirements, we request that this monitoring be required twice over the life of the permit, rather than annually.

Thank you for the opportunity to comment on the draft order. We would appreciate discussing these revisions at your earliest opportunity. We understand that the draft order is currently on the agenda for the June meeting of the Water Board. For purposes of the hearing, Vintage requests status as a designated party. As you know, Vintage discharges approximately 85 percent of the waste water received by Valley Waste and benefits directly from the permit.

Very truly yours,

KLEIN, DeNATALE, GOLDNER,
COOPER, ROSENLIEB & KIMBALL, LLP



Lynne Johnson Carrithers

Dale Harvey
May 18, 2007
Page 3

cc: Jim Robinson, Vintage Production California LLC
Larry Bright, Valley Waste Disposal Company
R.L. Schafer, R.L. Schafer & Associates
David Ansolabehere, Cawelo Water District
Jim Waldron, Chevron North America Exploration and Production