

Central Valley Regional Water Quality Control Board
12 October 2023 Board Meeting

Response to Written Comments on
Tentative Waste Discharge Requirements Order No. R5-2023-XXXX for
Premier Resource Management, LLC
North Antelope Hills Oil Field, Opaque Facility
Kern County

At a public hearing scheduled for 12 October 2023, the Regional Water Quality Control Board, Central Valley Region (Central Valley Water Board) will consider adoption of tentative Waste Discharge Requirements Order No. R5-2023-XXXX (Order) for the discharge of oil field produced wastewater (produced wastewater or discharge) to three unlined surface impoundments (ponds) at the Opaque Facility in the North Antelope Hills Oil Field (Facility). This document provides an overview of the written comments received from interested persons and parties in response to the tentative Order. Written comments from interested parties were required to be received by the Central Valley Water Board by 29 September 2023 in order to receive full consideration.

During the 30-day public comment period, the Central Valley Water Board received a total of 35 letters in support of the tentative Order as written. Provided below is a list of the letters that were received by the Central Valley Water Board by the deadline:

1. Honorable Shannon Grove, California State Senate, District 12 (received on 28 September 2023);
2. Bill Wright, President, Oilfield Safety Anchor Service, Inc. (received on 29 September 2023);
3. Brad Newburg, Vice President, Trinity Safety Company (received on 12 September 2023);
4. Brenda Umbro, Resident of San Diego (received on 11 September 2023);
5. Carl Glatz, Resident of Bakersfield (received on 29 September 2023);
6. Clint Hensley, Chemical Specialist, Berry Petroleum (received on 28 September 2023);
7. Craig, Covello, Vice President, Central California Oil, Co (received on 29 September 2023);
8. Dan Corriea, Weststar (received on 26 September 2023);
9. Darryll May, Resident of Bakersfield (received on 26 September 2023);
10. David Ewert, Excelleration Consulting (received on 27 September 2023);
11. Dawn Kerley, NA (received on 27 September 2023);
12. Deborah Olson, Resident of Bakersfield (received on 29 September 2023);

13. Donald Greenfield, Keystone Diversified Energy, Inc. (received on 26 September 2023);
14. Gary Grillette, TRC Operating Company (received on 29 September 2023);
15. James Haney, NA (received on 29 September 2023);
16. Jeff Fisher, Operations Foreman, Kern River Holdings II, Inc. (received on 27 September 2023);
17. Jessika Umbro, Resident of San Diego (received on 12 September 2023);
18. James Clifford, President, CEO Drilling Fluids, Inc. (received on 12 September 2023);
19. John Agee, NA (received on 27 September 2023);
20. John Moran, COO, Mountain View Resources, LLC & Grapevine Energy, LLC (received on 26 September 2023);
21. John Tuttle, Sinclair Well Products (received on 26 September 2023);
22. Joseph Silvi, Student at UC Berkeley (received on 18 September 2023);
23. Kenneth Gester, NA (received on 29 September 2023);
24. Kevin Darnall, NA (received on 21 September 2023);
25. Kevin Killion, Sales Manager, BPS Supply Group (received on 29 September 2023);
26. Lindsey Thompson, Lead Analyst, Sage Rider West (received on 29 September 2023);
27. Lonnie Kerley, Consultant (received on 26 September 2023);
28. Michael Umbro, Resident of San Diego (received on 11 September 2023);
29. Paul Fahey, COO, JD Rush Company, Inc. (received on 29 September 2023);
30. Rex Bein, NA (received on 27 September 2023);
31. Richard Garcia, President LULAC Council 3272 (received on 29 September 2023);
32. Ron Conrow, RC Petroleum Consulting (received on 29 September 2023);
33. Russell Elrod, President, APT General Engineering Inc. (received on 27 September 2023);
34. Thomas Goeres, NA (received on 28 September 2023); and
35. William Umbro, Resident of San Diego (received on 11 September 2023).

Many of the support letters state that the *Waste Discharge Requirements will support a clean energy project to convert oil fields to geothermal energy storage*. This is in reference to the operator's plans to eventually change the focus of the Opaque Facility to geothermal energy. According to the operator, this phase of the project will not occur until the operator has an underground injection control permit for the injection of produced wastewater into the subsurface. The ponds and discharge described in the

draft tentative waste discharge requirements, which will not take produced wastewater from wells related to geothermal energy, are unrelated to the geothermal energy project, but are needed until an underground injection control permit can be obtained for the injection of produced wastewater.

The Central Valley Water Board did not receive any letters in opposition to the tentative Order. The tentative Order will be presented to the Board for consideration of adoption as is.