



EDMUND G. BROWN JR.  
GOVERNOR



MATTHEW RODRIGUEZ  
SECRETARY FOR  
ENVIRONMENTAL PROTECTION

## Los Angeles Regional Water Quality Control Board

July 18, 2016

Mr. John David  
Hunt Enterprises  
4416 E. 154<sup>th</sup> Street  
Lawndale, California 90260

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED  
CLAIM NO. **7015 0640 0006 6057 6948**

**Notice Of Violation - Failure To Respond to California Water Code Order Pursuant To Section 13267 - Order to Submit Information Disposal Of Well Drilling Fluids, Well Completion Fluids, And Production Fluids To Land For Hunt Enterprises Oil And Gas Operations In Los Angeles And Ventura County, California**  
**Order No. R4-2015-0367**

Dear Mr. David:

The California Regional Water Quality Control Board (Regional Board), Los Angeles Region is the public agency with primary responsibility for the protection of groundwater and surface water quality for all beneficial uses within major portions of Los Angeles and Ventura Counties.

In an Order pursuant to California Water Code Section 13267 (Order) (copy enclosed) issued on December 18, 2015, the Regional Board Executive Officer directed Hunt Enterprises to submit information in a technical report (Report) by January 18, 2016. A Certified Mail return receipt was received by the Regional Board confirming delivery of the Order on December 23, 2015. The Order required you to assess discharges for activities within the oil and gas fields you operate and to notify the Regional Board if you had no discharges at any oil and gas facility within Los Angeles or Ventura Counties. To date, we have not received a response to the Order or any technical report.

### **Delinquent Technical Report**

In the Order dated December 18, 2015, the Regional Board directed you to submit a Report containing the following items by January 18, 2016:

- 1) The locations of all current and historic sumps (as defined in the Order) in your area of operations used in the discharge of fluids to land. Provide all information regarding liner material used with each sump, if any. Provide the status of all sumps, including active, inactive, closed with cleanup, closed without cleanup, or unknown. For sumps closed with cleanup, describe the cleanup activities and cleanup level.
- 2) The procedures you use to close or abandon sumps, or otherwise cease their operation.

- 3) The estimated total annual amount of fluid previously discharged into each historic and active sump, and estimated annual amount of fluid to be discharged to active sumps going forward.
- 4) The physical and chemical composition of any fluids discharged into each sump.
- 5) The physical and chemical composition of any solidified waste in each sump.
- 6) The location of any domestic, municipal, and commercial water wells within a half-mile radius of any current or historic sump.
- 7) Historic water quality data available for any wells within a half-mile radius of any current or historic sump. Attachment A of the Order lists the constituents we are most interested in for historical data (as well as current data).
- 8) Current sampling results for any wells within a half-mile radius of any current or historic sump. You are required to sample these wells for the constituents listed in Attachment A to the Order and submit the results in your technical report.
- 9) Locations, well construction, and survey data for any monitoring wells in the vicinity of any current or historic sumps, and water quality data associated with these wells.

If no discharges occurred during the period in which Hunt Enterprises or any subsidiary has owned and/or operated within the oilfield(s) you operate in, please submit a statement certifying that no such discharges occurred, and include a description of disposal methods, destinations, and volumes for fluids associated with drilling practices and oil/gas operations.

The Regional Board has not received items 1 through 9, listed above, or a statement that no discharges occurred while you have owned the property to date.

**YOU ARE HEREBY NOTIFIED** that you are in violation of California Water Code section 13267 by failing to provide a technical report including items 1 through 9 listed above by January 18, 2016.

You are required to immediately ensure full compliance with the Order dated December 18, 2015, and all amendments thereto.

Compliance with the task(s) listed in this Notice of Violation does not affect the Regional Board's authorization to take enforcement action against you for the violations noted herein. These violations may subject you to further enforcement actions, including administrative civil liabilities up to one thousand dollars (\$1,000) for each day that you are out of compliance with the Order. These administrative civil liabilities can be assessed by the Regional Board for failure to comply from the original due date of the January 18, 2016. The Regional Board reserves the right to take any further enforcement action authorized by law, including referring the matter to the Attorney General.

If you have any questions, please contact Regional Board staff: Dr. Yue Rong at (213) 576-6710 or by email at [yue.rong@waterboards.ca.gov](mailto:yue.rong@waterboards.ca.gov); or Mr. Joshua Cwikla at (213) 576-6713 or by email at [joshua.cwikla@waterboards.ca.gov](mailto:joshua.cwikla@waterboards.ca.gov)

Sincerely,



Paula Rasmussen  
Assistant Executive Officer

Enclosure: *Regional Board Order dated December 18, 2015*

cc: John Borkovich, State Water Resources Control Board  
Eric Morita, State Water Resources Control Board  
Janice Zinky, State Water Resources Control Board  
Julie Macedo, Office of Enforcement, State Water Resources Control Board  
Eric Gillman, Office of Chief Counsel, State Water Resources Control Board  
Pat Abel, Division of Oil, Gas, and Geothermal Resources  
Daniel Dudak, Division of Oil, Gas, and Geothermal Resources

