



EDMUND G. BROWN JR.
GOVERNOR

MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

Los Angeles Regional Water Quality Control Board

November 16, 2015

CERTIFIED MAIL
RETURNED RECEIPT REQUIRED
7014 2870 0001 4538 1900

Steven Coombs, Agent
Patriot Resources, LLC (A4050)
1565 Las Canoas Road
Santa Barbara, CA 93105

ORDER PURSUANT TO CALIFORNIA WATER CODE SECTION 13267. You are legally obligated to respond to this Order. Read this Order carefully.
(GEOTRACKER GLOBAL ID. NO. T1000007379)
(REGIONAL BOARD CASE NO. 11100249)

Dear Mr. Coombs:

Patriot Resources, LLC, is the operator of injection well identified as American Petroleum Institute (API) number 11100249 (hereinafter "injection well subject to this Order"). The California Division of Oil, Gas, and Geothermal Resources (Division) has informed the Los Angeles Regional Water Quality Control Board (Los Angeles Water Board) that the injection well subject to this Order has been injecting Class II fluids produced by oil or gas extraction activities into an aquifer that may not have been properly designated as an exempt aquifer under the federal Safe Drinking Water Act (42 U.S.C. § 300(f) et seq.). The aquifer may be suitable for drinking water supply and other beneficial uses.

The Los Angeles Water Board is concerned about the potential threat to human health and potential impacts to water quality posed by the discharge of waste associated with the injection of fluids into aquifers that may be suitable for drinking water supply and other beneficial uses. The technical information and reports required by this Order are necessary to assess the potential threat to human health and potential impacts to water quality. The need to understand the potential threat to human health and potential impacts to water quality justifies the need for the information and reports required by this Order. Based on the nature and possible consequences of the discharges of waste, the burden of providing the required information, including reporting costs, bears a reasonable relationship to the need for the report, and the benefits to be obtained. Patriot Resources, LLC is required to submit this information and reports because it is the operator of the injection well subject to this Order.

This Order requires that Patriot Resources, LLC provide information demonstrating that the existing injection activities are protective of human health and the environment. This document is NOT an order to shut-in this injection well.

Statutory and Procedural Background

The Los Angeles Water Board's authority to require technical reports derives from section 13267 of the California Water Code, which specifies, in part, that:

- b. If fluids have been injected into the injection well subject to this Order, an analysis of a representative sample of those fluids in accordance with the water quality analysis and reporting requirements contained in Attachment A to this Order.
- c. All available historical chemical analyses of the fluids injected into the injection well subject to this Order.
- d. All previously obtained analytical data for groundwater samples collected from any injection zones within one (1) mile of the injection well subject to this Order.
- e. A list and location map of all water supply wells within one mile of the injection well subject to this Order.
- f. Information for each identified water supply well, including: well completion report records from the Department of Water Resources; type of well (i.e., domestic, irrigation, industrial, etc.); whether any of the water is used for domestic purposes; status (i.e., active, idle, etc.); well construction; borehole geophysical logs; and all analytical results for any water sample(s) collected from each water supply well. The information collected as part of this well survey is to be supplemented by an on-the-ground verification of the current condition or existence of the wells and any new wells not listed in the database(s) search. Exact locations of all the wells are to be provided on a scale map and clearly labeled. If exact locations are not available, an explanation as to why the locations were not provided must be included.
- g. For the injection well subject to this Order, the following information for items A-N shall be submitted in a spreadsheet, labeled with the capital letters indicated. The information for items O-R shall be submitted as attachments:
 - A. The name of the owner and/or operator of the injection well;
 - B. API number for the injection well;
 - C. Injection well name and number
 - D. Name of the field in which the injection well is located;
 - E. County in the which the injection well is located;
 - F. Latitude and Longitude (decimal degrees) of well head location;
 - G. Latitude and Longitude Datum, indicate "1" for North American Datum of 1983 or "2" for North American Datum of 1927;
 - H. Injection well total depth (feet);
 - I. Top injection depth (feet);
 - J. Formation/Zone name at top injection depth;
 - K. Bottom injection depth (feet);
 - L. Formation/Zone name at bottom injection depth;
 - M. Date injection started in the well (Day/Month/Year, xx/xx/xxxx);
 - N. Total injection volume in barrels by calendar year (to present day);

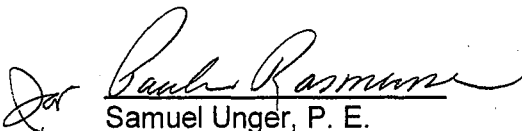
issuance of an Administrative Civil Liability Complaint pursuant to California Water Code section 13268. Liability may be imposed pursuant to California Water Code section 13268 in an amount not to exceed one thousand dollars (\$1,000) for each day in which the violation occurs.

Any person aggrieved by this Order of the Los Angeles Water Board may petition the State Water Board to review the action in accordance with California Water Code section 13320. The State Water Board must receive the petition by 5:00 p.m., within 30 days after the date of this Order, except that if the thirtieth day following the date of this Order falls on a Saturday, Sunday, or state holiday, the petition must be received by the State Water Board by 5:00 p.m. on the next business day. Copies of the law and regulations, and instructions applicable to filing petitions, are at http://www.waterboards.ca.gov/public_notices/petitions/water_quality/index.shtml, or will be provided upon request.

Be advised that sections 13260 and 13264 of the California Water Code require any person who proposes to discharge waste that could affect waters of the state to submit a Report of Waste Discharge for any new discharge or change in the character, volume, or location of an existing discharge. Fluids produced by oil or gas extraction activities that can no longer be disposed of in the injection well subject to this Order cannot be discharged to land or waters of the state prior to the issuance of Waste Discharge Requirements, and cannot be discharged to waters of the United States prior to the issuance of an National Pollutant Discharge Elimination System (NPDES) Permit. Failure to comply with these requirements may constitute a misdemeanor under Water Code section 13265 or a felony under Water Code section 13387, and may also subject Patriot Resources, LLC to judicial or administrative civil liabilities.

Any questions regarding this matter should be directed to Wendy Liu at (213) 576-6760 or at wliu@waterboards.ca.gov.

Sincerely,


Samuel Ungér, P. E.
Executive Officer

Enclosure:

Attachment A - Water Quality Sampling, Analysis and Reporting
Attachment B - GeoTracker Upload Instructions and Assigned Global Identification Number(s)

cc : Mr. Jonathan Bishop, State Water Resources Control Board
Mr. John Borkovich, State Water Resources Control Board
Ms. Paula Rasmussen, Los Angeles Regional Water Quality Control Board
Mr. Steve Bohlen, California Department of Conservation, DOGGR Headquarters
Mr. John Geroch, California Department of Conservation, DOGGR District 1
Mr. Bruce Hesson, California Department of Conservation, DOGGR District 2

Water Quality Reporting

Work plans, and technical reports and associated data shall be uploaded in an electronic format compatible with the State's GeoTracker system.

Technical Report that includes

- Site plan with the location(s) of the wells sampled
- Description of field sampling procedures
- Copies of analytical laboratory reports, including quality assurance/quality control procedures and analytical test methods.
- Waste management and disposal procedures
- Table(s) of analytical results organized by well number (including API number).
- A list and location map of all the water supply wells located within a one mile radius of the injection well(s)

All GeoTracker uploads should consist of a GeoReport, GeoMap(s), and an EDF of laboratory data, if applicable.