



July 8, 2016

Pamela Creedon
Executive Officer
Central Valley Water Board

Patrick Pulupa
Acting Executive Officer
Central Valley Water Board

Clay Rodgers
Assistant Executive Officer
Central Valley Water Board

Re: Comments on Administrative Draft General Orders for Oil Field Discharges to Land

Pamela, Patrick, Clay,

Macpherson Oil Company a family owned and operated California Company offers the following comments on the administrative draft general orders applying to production water discharge to oil ponds, surface impoundments and land.

Macpherson Oil Company is concerned with the definition of surface impoundments and the inclusion of facilities such as MOC's sand basin. The sand basin is a facility that separates water and solids with solids normally being recycled into the road mix process and water being sent to the dehydration system. MOC's sand basin is a concrete structure that sets on the surface and partially into a hill. It is constructed of concrete, with a capacity of 130 bbl of liquid, and is operated at 50% capacity under a SJVAPCD air permit.

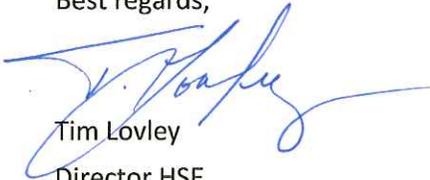
It is MOC's comment that facilities such as MOC's sand basin should be clearly exempted from the general orders. Under Title 27 Section 20090 i.e., the WDR exemptions includes "Fully Enclosed Units – Waste Treatment in fully enclosed facilities, such as tanks, or in concrete-lined facilities of limited are extent, such as oil-water separator which are designed, constructed, and operated according to API specifications." Additionally the operations performed within the sand basin and similar facilities is not a discharge to land. MOC suggests the facilities such as MOC's sand basin or other a concrete facility, tank, or similar surface facility be exempt from the general orders.

It is MOC's comment that the general orders should include alternate methods of monitoring such as a direct monitoring or similar program without requiring an extensive technical and geological report / ground monitoring plan and program. A direct monitoring plan would cost between \$18,000 and \$23,000 dollars for design and installation. With an annual cost of less than \$1,500. If a ground monitoring plan and program were required the cost is estimated at \$160,000 to \$240,000 for a consulting firm to develop the plan, installation of 3 monitoring wells at \$200,000 per well for a total development cost of \$760,000 to \$840,000. The estimated annual operating cost is \$80,000. A ground monitoring plan and program is 36 times more costly and would not provide the level of protection that a direct monitoring program would.

MOC does not support the requirement of licensed professionals or limiting the licensed professionals to PE, PG, or HG. Many operators are small and do not have the need for a full time licensed professional. The use of licensed professionals or limiting the list to a subset of licensed professionals adds substantial costs without additional insurances of accuracy or completeness. In addition, the CVWB currently requires certification of data submitted by the operator. The certification and the use of a licensed professional are redundant and only adds cost without benefit.

MOC appreciates the opportunity to provide insights on the impacts of the general orders.

Best regards,



Tim Lovley
Director HSE

Distribution:

Rock Zierman, CIPA

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