
Central Valley Regional Water Quality Control Board

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SUBJECT: OIL FIELD PRODUCED WATER POND STATUS REPORT #2

The Central Valley Water Board (CVWB) has undertaken a significant effort to address issues associated with unlined surface ponds used to dispose of water produced as a by-product of oil production. A work plan was prepared by CVWB staff in November of 2014 identifying work needed to be completed and an implementation schedule for completion of this program by the end of 2016. This status report identifies where we are in the process and what impediments have been encountered and whether the schedule is being maintained.

Inventory

The inventory of produced water ponds has been completed. A total of 933 ponds located on 265 facilities have been identified. This process involved verifying the location of known ponds and locating any additional ponds that maybe in operation but not reported to the Water Board. For known ponds, staff obtained records from its files. For newly identified ponds, staff used aerial photographs and information from the Division of Oil, Gas, and Geothermal Resources (DOGGR). This information was then correlated to known facilities that are currently regulated by waste discharge requirements (WDRs) and was also used to identify areas where inspections were needed.

Field Inspections

As of 27 February, all 933 ponds identified through the Board's inventory activities have been inspected. Staff is currently writing inspection reports to document their findings. Approximately 100 inspection reports need to be finished to complete the field inspection activities. We are on track to complete inspection reports by 13 March.

Through the inspections, staff has identified 578 active ponds and 355 inactive ponds. Staff defines inactive ponds as ponds that have no indication of recent discharge and the operators have no intent of future discharge. Of the 578 active ponds, 370 are regulated by WDRs and 208 that are not. As a note, some of the inactive ponds are currently regulated by WDRs. Inactive ponds that will not receive wastewater are not required to be regulated by WDRs.

The inspection reports will serve as Notices of Violation (NOVs) for active ponds that are not covered by WDRs and there is no record of a Report of Waste Discharge (RWD) having been submitted. For inactive ponds that anticipate receiving wastewater in the future, but are not currently regulated by WDRs, the inspection report will lay out the requirement for submitting RWDs and getting coverage under WDRs before discharge can occur to these ponds. Closure/post-closure WDRs may also be required for ponds that are closed as landfills (i.e., by leaving some waste in place).

Enforcement Orders

We are currently drafting enforcement orders for active facilities that are not covered by WDRs and for regulated facilities where the current WDRs need to be updated. A template for a Cleanup and Abatement Orders (CAO) for operators of unregulated sumps has been drafted. We do not know at this time how many CAOs will be required but anticipate well over 100. Use of this template will help staff develop the CAO orders in an efficient and expedient manner. At the request of the Central Valley Water Board, staff will bring the initial two CAOs to the Board for their full consideration at the June 2015 meeting. We do not anticipate bringing all CAOs to the Board for a full hearing. It is staff's intent to have subsequent CAOs be issued by staff under authority delegated by the Board. Barring any unforeseen circumstances, the schedule is to have enforcement orders completed by the end of calendar year 2015.

Permitting Activities

Drafting of general WDRs will begin this spring.