

**Note: This document has been prepared by the  
Central Valley Water Board's Prosecution Team**

ITEM: 10

SUBJECT: Longview Energy Company, Surfluh Lease, Raisin City Oil Field,  
Fresno County

BOARD ACTION: *Consideration of a Cleanup and Abatement Order (CAO)*

BACKGROUND: Longview Energy Company (hereinafter Discharger) operates a petroleum production wastewater discharge facility at its Surfluh Lease in the Raisin City Oil Field (Surfluh Lease). The Discharger has not submitted a Report of Waste Discharge. The Surfluh Lease is not regulated by Waste Discharge Requirements (WDRs) for the discharge of petroleum production wastewaters.

On 27 March 2015, the Central Valley Water Board (CVWB) issued a Notice of Violation (NOV) to the Discharger that was the result of an inspection conducted on 4 February 2015. During the inspection, wastewater was being discharged to a pond. The NOV alleged that the discharge was in violation of Section 13260 of the California Water Code for failure to submit a Report of Waste Discharge before discharging waste that could affect the quality of waters of the State. A sample of the wastewater from the pond was collected and analyzed. The analytical results showed the sample had an electrical conductance of 41,000 microsiemens per centimeter; total dissolved solids of 27,000 milligrams per liter (mg/l); a chloride concentration of 15,000 mg/l; and a boron concentration of 7.7 mg/l.

ISSUES: The Discharger contended that the fluid in the pond originated as overflow from a wastewater storage tank and the rupture of a plastic pipe in the water treatment system, and that wastewater is disposed of through two injection wells. Since the inspection, the Discharger has installed an additional wastewater storage tank, increasing capacity to prevent future overflows, and backfilled the pond with fill dirt. The Discharger does not intend to have any future discharges to land.

The Discharger has reported that it does not intend to contest the proposed Cleanup and Abatement Order (CAO) which requires monitoring and waste characterization at the Surfluh Lease, is planning to conduct the necessary investigations to determine whether there has been an impact on water quality, and will properly close the pond. The Discharger does not intend to exercise the option within the CAO to submit a Report of Waste Discharge to continue using the pond.

SUMMARY: The CVWB's Prosecution Team, after evaluation of Discharger's

comments is in agreement with Discharger's intent to conduct the necessary hydrogeologic evaluation to determine whether wastewater disposal at the Surfluh Lease has impacted underlying groundwater. Since the lease is in the middle of the San Joaquin Valley, the Prosecution believes it is unlikely that Discharger would be able to demonstrate that surface discharge of the wastewater is appropriate.

RECOMMENDATION: The Prosecution Team recommends that the Board adopt the Cleanup and Abatement Order as proposed.

Mgmt. Review \_\_\_\_\_  
Legal Review \_\_\_\_\_

**4/5 June 2015**