

**Regional Water Quality Control Board
Central Valley Region
Board Meeting – 30/31 July 2015**

**Response to Written Comments for Longview Energy Company
Surfluh Lease
Fresno County
Tentative Cleanup and Abatement Order**

At a public hearing scheduled for 4/5 June 2015, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) will consider adopting a cleanup and abatement order that requires Longview Energy Company to determine whether the discharge of petroleum production wastewater at the Surfluh Lease can comply with applicable laws, policies, and regulations by conducting a complete waste characterization, a hydrogeological site characterization, and, if necessary, corrective action.

This document contains responses to substantive comments received from interested parties regarding the proposed Order circulated on 3 April 2015. Written comments from interested parties were required by public notice to be submitted to the Central Valley Water Board by 5:00 pm on 27 April 2015 to receive full consideration. Comments were received by the due date from:

1. Longview Energy Company

The substantive comments are summarized below, followed by Central Valley Water Board staff responses.

LONGVIEW ENERGY COMPANY

COMMENT: The “pond” at issue is not a purposeful fluid collection area. The depression is the location where an original gunite lined sump was closed under the jurisdiction of the Central Valley Water Board. Over the 14 years since the approved closure, the fill soil over the abandoned sump has compressed under the weight of wheel loads and subsided to create the depression. During the spring, rainfall will accumulate in the low spot. Additionally, any leaks or pipe failures outside of the bermed area could collect in the depression.

RESPONSE: Since the “pond” has been the location of a discharge to land and has the ability to impact water quality, water quality laws and regulations apply. The term “pond” will not be changed.

COMMENT: Longview respectfully requests the following changes to the Tentative Order since no produced water will be discharged to land other than in permitted injection wells:

- Remove requirement to submit a Report of Waste Discharge;

- Remove the requirement for Longview to discharge to a surface impoundment other than in an event of a catastrophic equipment failure in accordance with their SPCC plan;
- Remove the requirements for monitoring the discharge to a pond.

RESPONSE: The requirement for waste discharge requirements will only apply if waste is discharged in the future. If the pond is or has been closed in accordance with an approved work plan, a report of waste discharge will not be required and the pond monitoring requirements will not apply. If another entity becomes responsible for the discharge of waste at the lease while the cleanup and abatement order is in effect, then the requirements of the cleanup and abatement order will be in place in case the new responsible party wants to approach the situation differently. The requested modifications will not be made.

COMMENT: Finding No. 2 should read "...two wastewater injection wells...".

RESPONSE: Finding No. 2 will be changed as requested.