

JUN 16 2015

RWQCB-CVR
FRESNO, CALIF.

TECHNICAL REPORT – POTENTIAL DISCHARGES TO LAND, MCKITTRICK OIL FIELD

Aera Energy LLC
Kern County, California

Prepared for:

Aera Energy LLC
10000 Ming Avenue
Bakersfield, California

Prepared by:

Amec Foster Wheeler Environment & Infrastructure, Inc.
1281 East Alluvial Avenue, Suite 101
Fresno, California 93720
(559) 264-2535

June 11, 2015

Project FR15160780

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RWQCB-CVR
FRESNO, CALIF.

Ronald Holcomb
Central Valley Region
Water Quality Control Board
1685 East E Street
Fresno, CA 93706

SUBJECT: INFORMATION REQUESTED BY SECTION 13267 ORDER
McKITTRICK OIL FIELD

Dear Mr. Holcomb:

In a letter dated April 1, 2015, the Regional Water Quality Control Board (RWQCB) requested laboratory analyses of locations previously identified by RWQCB staff and an inventory of other potential discharge locations not previously identified. The attached report prepared by Amec Foster Wheeler Environment & Infrastructure, Inc. includes the requested information covering Aera Energy LLC's (Aera) operations within the McKittrick Oil Field.

Aera has provided as much information as possible within the short timeframe specified by the RWQCB. Existing equipment databases were queried and experienced personnel were engaged to prepare the inventory. Even taking into account these measures, it is possible that some minor discharge locations were overlooked.

In addition, Aera continues to install new or modify existing equipment that could be classified as a potential discharge point. Pressure relief valves are needed to protect personnel and equipment from catastrophic failures or a new steam injection well, approved by the Division of Oil, Gas and Geothermal Resources, may be drilled to support existing operations. Aera understands that the RWQCB is re-evaluating the regulatory framework that encompasses this type of equipment. When the evaluation is complete, the attached report may need to be supplemented to include added discharge locations or delete locations that have been abandoned.

The sampling of the fluids has been proceeding expeditiously. However, many of the locations do not contain fluids or sufficient fluids to collect the required samples. Where fluids are available, extensive safety planning must be implemented in order to ensure

Mr. Ronald Holcomb
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the well-being of the personnel performing the work. Further, some of the laboratory methods requested by the RQWCB take several weeks to complete. Accordingly, laboratory analytical results will be submitted as they are received by Aera.

If you have any questions or require additional information, please contact Ron Chambers at (661) 665-5641 or John Haley at (661) 665-5279.

CERTIFICATION:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



W. D. Anderson
Vice President
Belridge Asset

cc: Ron Chambers, Aera
John Haley, Aera
William Pipes, Amec
Alex Olsen, Amec



June 11, 2015

Project FR15160780

Mr. John Haley
Aera Energy LLC
10000 Ming Avenue
Bakersfield, California 93311

Subject: Technical Report – Potential Discharges to Land, McKittrick Oil Field
Aera Energy LLC, Kern County, California

Dear Mr. Haley:

Amec Foster Wheeler Environment & Infrastructure, Inc. (Amec Foster Wheeler), is pleased to provide this technical report to Aera Energy LLC (Aera), presenting the results for the recent review of potential discharges to land conducted at the McKittrick Oil Field in Kern County, California. The review was conducted to comply with the Central Valley Regional Water Quality Control Board's (RWQCB) Section 13267 Order (Order) dated April 1, 2015 (Appendix A). The order requested that potential discharges of wastewater to land be identified and where possible analytical results of wastewater samples collected be submitted in a technical report to the RWQCB by June 15, 2015.

DISCHARGE LOCATIONS

Aera has identified 59 potential discharge points within the McKittrick Oil Field. An inventory list, provided by Aera, of potential discharge points with their intended use is included in Appendix B. The locations of each discharge point are shown on Figure 1 included in Appendix B.

WASTEWATER SAMPLING

Samples could not be collected from the potential discharge points identified due to the locations being dry, the locations are only used during an emergency (i.e. pressure relief valve), the discharge location was not in operation, or samples could not be collected safely (e.g. high temperatures associated with steam).

The RWQCB did not previously identify any potential discharges to land for the McKittrick Oil Field in their Order. As previously mentioned, Aera has identified several potential discharge points and is in the process of collecting samples as conditions allow and evaluating the potential for collecting representative samples from the remaining locations with Amec Foster Wheeler.



Mr. John Haley
Aera Energy LLC
June 11, 2015
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CERTIFICATION

This letter was prepared by Amec Foster Wheeler staff under the supervision of the Professional Geologist whose seal and signature appear hereon. The findings, recommendations, specifications, or professional opinions presented in this letter were prepared in accordance with generally accepted professional geologic practices and within the scope of this project. No other warranty, express or implied, is provided.

Amec Foster Wheeler is pleased to be of service to Aera. Please call if you have any questions or require additional information.

Sincerely yours,
Amec Foster Wheeler Environment & Infrastructure, Inc.

A handwritten signature in black ink, appearing to read "Alex O. Olsen Jr.", written in a cursive style.

Alex O. Olsen Jr., PG
Senior Geologist



Attachments:

Appendix A – April 1, 2015, California Water Code Directive Pursuant to Section 13267
Appendix B – Inventory List and Mckittrick Potential Discharge Location Points

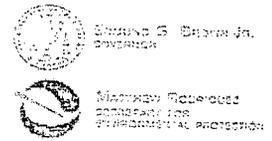
cc: Ron Chambers, Aera Energy LLC



amec
foster
wheeler

APPENDIX A

April 1, 2015, California Water Code Directive Pursuant to Section 13267



Central Valley Regional Water Quality Control Board

1 April 2015

Megan Graves
Aera Energy LLC
10000 Ming Avenue
Bakersfield, CA 93389

CERTIFIED MAIL
7014 3490 0001 7023 0025

CALIFORNIA WATER CODE DIRECTIVE PURSUANT TO SECTION 13267. You are legally obligated to respond to this Order. Please read this Order carefully.

Aera Energy LLC (hereafter Discharger) has been identified as the owner or operator of petroleum production wastewater disposal ponds (ponds). A list of the ponds (and the leases and oil fields where they are located) that the California Regional Water Quality Control Board, Central Valley Region (Central Valley Water Board) identifies as under your control is presented in Attachment A. Ponds for the disposal of wastewater generated during the course of petroleum production have the potential to affect the quality of groundwater (a water of the State). Groundwater underlying the areas where your ponds are located have beneficial uses as identified in the Water Quality Control Plan for the Tulare Lake Basin (Basin Plan).

This order requires the collection and analysis of wastewater samples collected from each of the ponds listed in Attachment A to characterize the discharge. Each sample is to be analyzed for each of the constituents listed in Attachment B. These data are needed to comprehensively characterize wastewater in each pond and provide data needed to evaluate the threat to the quality of waters of the State. If more than one pond is connected in series (i.e., one pond drains directly to the next with no other source of inflow) then only the upstream pond must be sampled. This order is not intended to require the collection of duplicative data. If during the 12 months (one year) prior to the date of this order, samples required by this order have been analyzed from one or more of the ponds for the required constituents, that data can be submitted for the appropriate order requirements.

This order also requires Discharger to identify any discharge(s) of oil field wastewater to land that is not identified in Attachment A. Discharger must also collect and analyze wastewater samples in accordance with Attachment B from any additionally identified discharge to characterize the discharge.

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

(b) A regional Board ... in connection with any action relating to any plan or requirement authorized by this division, may investigate the quality of any waters of the State within its region.

(b)(1) In conducting an investigation specified in subdivision (a), the regional board may require that any person who has discharged, or is suspected of having discharged or discharging, or who proposes to discharge waste within its region, or any citizen or domiciliary, or political agency or entity of this state who has discharged, discharges, or is suspected of having discharged or discharging, or who proposes to discharge, waste outside of its region that could affect the quality of waters within its region shall furnish, under penalty of perjury, technical or monitoring program reports which the regional board requires. The burden, including costs, of these reports shall bear a reasonable relationship to the need for the report and the benefit to be obtained from the reports. In requiring those reports, the regional board shall provide the person with a written explanation with regard to the need for the reports, and shall identify the evidence that supports requiring that person to provide the reports.

The Central Valley Water Board is concerned about the potential impacts to water quality posed by the discharge of oil field produced waters in surface ponds. The technical information and reports required by this order are necessary to assess the potential threat to water quality. The need to understand the potential impacts to water quality justify 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 the reporting costs, bears a reasonable relationship to the need for the report, and the benefits to be obtained. Discharger is required to submit this information and reports because it is the operator of the ponds listed in Attachment A of this order.

The unauthorized discharge of waste containing oil field waste constituents to land, including unlined ponds, may result in the degradation of water quality and creates or threatens to create, a condition of pollution in groundwater. Significant concentrations of salinity (measured as TDS and EC), significant contributors to salinity such as chloride and sulfate, and boron are present in oil field wastewater. Other potential constituents such as, but not limited to, metals, radionuclides, and organic compounds pose a threat to water quality. The concentrations of these waste constituents in wastewater being discharged needs to be known to evaluate the threat. In addition, all locations where these discharges are occurring needs to be known.

Underlying groundwater can be degraded if mixed with oil field wastewater. Elevated concentrations of oil field waste constituents could impair the groundwater for municipal and domestic supply and agricultural supply uses.

Under the prescribed authority of California Water Code section 13267, the Central Valley Water Board directs Discharger to:

1. By 15 June 2015, submit a technical report containing the following information:

- A. Identification of any discharges of oil field produced waters to land, including but not limited to ponds, since April of 2014 that are not listed in Attachment A;
- B. Collect representative samples of wastewater within each of the ponds. Samples must be analyzed in accordance with the water quality analysis and reporting requirements contained in Attachment B to this Order;¹

If a representative sample cannot feasibly be collected from one or more of the sources discharging to a surface impoundment(s), then a comment will need to be added to the technical report required by this Order demonstrating that collection of a representative sample from a specific source is not feasible within the required timeframe, and propose an alternative sampling procedure and expeditious time schedule for obtaining a representative sample for each source. Alternative sampling procedures and time schedules are subject to approval by the Assistant Executive Officer of the Central Valley Regional Water Quality Control Board.

- C. All available information for each of the surface impoundment(s), including dimensions (i.e., length, width, and depth), latitude and longitude, Assessor's Parcel Numbers of the lease, duration of the discharge (in months), and the volume of wastewater discharged per year.
- D. A location map that includes the following information:
 - i. All surface impoundment(s) at the Facility,
 - ii. Include the boundary lines for all leases at the Facility, and
 - iii. Legend with the name of the surface impoundment(s).

2. By 15 April 2015, Discharger needs to contact Dane S. Johnson of this office at (559) 445-5525 if you have received this Order and cannot collect the required samples.

¹ All previously obtained analytical data for oil field produced wastewater samples collected at the Facility, if any, with a description of the source and location for each analysis may be submitted in the alternative for re-running tests if the sample(s) was collected and analyzed within 12 months (one year) of the date of this order.

The technical report required by this Order must be submitted to the attention of:

Ronald Holcomb
Central Valley Water Board
1685 E Street
Fresno, CA 93706

Based on the information submitted in the technical report, additional information or action may be required.

With the report required by this Order, Discharger shall provide under penalty of perjury under the laws of California a "Certification" statement to the Central Valley Water Board. The "Certification" shall include the following signed statement:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

The Central Valley Water Board reserves the right to issue a Notice of Violation or pursue enforcement for Discharger's activities after reviewing the documentation provided in response to this Order.

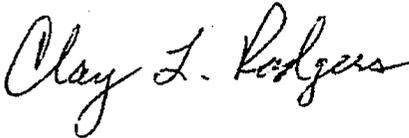
The Technical Report is to be signed and stamped by a California Professional Engineer (Registered as a Civil Engineer) or a registered California Professional Geologist. Any laboratory analyses shall be performed by an analytical laboratory certified by the State of California for the analyses performed. Submissions pursuant to this Order shall include a statement by Discharger, or an authorized representative of Discharger, certifying (as described above) that the information submitted is true, complete, and accurate.

The failure to furnish the required report, or the submission of a substantially incomplete report or false information, is a misdemeanor, and may result in additional enforcement actions being taken against Discharger, including 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. All discharges to unpermitted ponds should cease pending review and submission of the technical information sought by this order.

Any person aggrieved by this action of the Central Valley Water Board may petition the State Water Resources Control Board (State Water Board) to review the action in accordance with

California Water Code section 13320 and California Code of Regulations, title 23, sections 2050 and following. The State Water Board must receive the petition by 5:00 p.m., within 30 days after the date of this directive, except that if the thirtieth day following the date of this directive 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 applicable to filing petitions may be found on the Internet at: www.waterboards.ca.gov/public_notices/petitions/water_quality or will be provided upon request.

If you have any questions regarding this matter, please contact Doug Patteson of this office at (559) 445-5577 or at doug.patteson@waterboards.ca.gov.



Clay L. Rodgers
Assistant Executive Officer

cc: Julie Macedo, Office of Enforcement, State Water Resources Control Board, Sacramento
Mike Toland, California Division of Oil, Gas, and Geothermal Resources, Bakersfield

ATTACHMENT A

The following table contains the names of oil fields and lease(s) and the corresponding number of ponds that the Central Valley Water Board has identified as active and under your control:

OPERATOR	OIL FIELD	LEASE	NO. OF PONDS
Aera Energy LLC	Belridge, North		1
	Belridge, North	Belridge A	1
	Belridge, South	Aera Energy	20
		Belridge V	3
	Coalinga	CMS-Aztec	2
		Penn-Zier	7
		Sec26	9
	Lost Hills	Lost Hills One	1
		Lost Hills Two	2
	Midway-Sunset	Fulton	1
		Lockwood	1
		Moco 35	3
		National USL	2
		Section 8	1
		Shale 14	1
		Vedder	1
		W & S	1
	Wier	2	

ATTACHMENT B**Water Quality Analysis**

Wastewater samples collected from the ponds shall be analyzed by a laboratory certified by the Environmental Laboratory Accreditation Program using currently applicable United States Environmental Protection Agency-approved analytical methods for water for the following:

- A. Total dissolved solids;
- B. Metals listed in California Code of Regulations, title 22, section 66261.24. subdivision (a)(2)(A);
- C. Benzene, toluene, ethylbenzene, and xylenes;
- D. Total petroleum hydrocarbons as crude oil;
- E. Polynuclear aromatic hydrocarbons (including acenaphthene, acenaphthylene, anthracene, benzo[a]anthracene, benzo[b]fluoranthene, benzo[a]pyrene, benzo[g,h,i]perylene, chrysene, dibenzo[a,h]anthracene, fluoranthene, fluorine, indeno[1,2,3-cd]pyrene, naphthalene, phenanthrene, and pyrene);
- F. Radionuclides listed under California Code of Regulations, title 22, Table 64442;
- G. Major and minor cations (including sodium, potassium, magnesium, and calcium);
- H. Major and minor anions (including nitrate, chloride, sulfate, carbonate, bicarbonate, and bromide);
- I. Trace elements (including lithium, strontium, boron, iron, and manganese).

Reporting Requirements

Water Quality information shall be submitted in a technical report that includes at a minimum:

- A. Site plan(s) with the location(s) of where the samples were collected;
- B. A description of how the samples, representative of the pond contents, were collected;

Table(s) of analytical results organized by pond number with the data also submitted electronically as an Excel spreadsheet.

APPENDIX B

Inventory List and McKittrick Potential Discharge Location Points

Aera Energy LLC - McKittrick Oil Field
Potential Discharge Locations

Short Identifier	Map Page Number	Field	Lease	Description/Name	Location	RWQCB Name	Sec.	T	R	BM	Latitude	Longitude	APN	Potential Fluid	L	W	D	Construction	Status	Number of Discharge Points	Additional Comments	Intended Use	Volume Discharged [bb/yr]	Category
BL114	1	McKittrick	Calso	SG 130 Blowdown Pit	Calso	N/A	12	30S	21E	MD	35.33130	-119.66893	156-090-17	Steam	59	26		Earthen	Active	3		steam Blowdown		Blowdown pit
BL115	1	McKittrick	Calso	SG 150 Blowdown Pit	Calso	N/A	12	30S	21E	MD	35.32924	-119.66861	156-090-17	Steam	40	18		Earthen	Active	3		Steam Blowdown		Blowdown pit
BL116	1	McKittrick	Calso	SG 155 Blowdown Pit	Calso	N/A	12	30S	21E	MD	35.32721	-119.66804	156-090-17	Steam	50	24		Earthen	Active	3		Steam Blowdown		Blowdown pit
BL5209	1	McKittrick	Calso	700-125	South Prop	N/A	12	30S	21E	MD	35.33474	-119.66789	156-090-17	Steam					Active	6		2" Energy Control Bleed point x3 and 3/4" Energy Control Bleed point x3	< 1	Steam Injector
BL5210	1	McKittrick	Calso	705-125	South Prop	N/A	12	30S	21E	MD	35.33461	-119.66413	156-090-17	Steam					Active	6		2" Energy Control Bleed point x3 and 3/4" Energy Control Bleed point x3	< 1	Steam Injector
BL5211	1	McKittrick	Calso	707-125	South Prop	N/A	12	30S	21E	MD	35.33450	-119.66258	156-090-17	Steam					Active	6		2" Energy Control Bleed point x3 and 3/4" Energy Control Bleed point x3	< 1	Steam Injector
BL5212	1	McKittrick	Calso	711-125	South Prop	N/A	12	30S	21E	MD	35.33396	-119.66700	156-090-17	Steam					Active	6		2" Energy Control Bleed point x3 and 3/4" Energy Control Bleed point x3	< 1	Steam Injector
BL5213	1	McKittrick	Calso	715R-125	South Prop	N/A	12	30S	21E	MD	35.33396	-119.66412	156-090-17	Steam					Active	6		2" Energy Control Bleed point x3 and 3/4" Energy Control Bleed point x3	< 1	Steam Injector
BL5214	1	McKittrick	Calso	716R-125	South Prop	N/A	12	30S	21E	MD	35.33386	-119.66354	156-090-17	Steam					Active	6		2" Energy Control Bleed point x3 and 3/4" Energy Control Bleed point x3	< 1	Steam Injector
BL5215	1	McKittrick	Calso	717-125	South Prop	N/A	12	30S	21E	MD	35.33392	-119.66261	156-090-17	Steam					Active	6		2" Energy Control Bleed point x3 and 3/4" Energy Control Bleed point x3	< 1	Steam Injector
BL5216	1	McKittrick	Calso	725-125	South Prop	N/A	12	30S	21E	MD	35.33321	-119.66430	156-090-17	Steam					Active	6		2" Energy Control Bleed point x3 and 3/4" Energy Control Bleed point x3	< 1	Steam Injector
BL5217	1	McKittrick	Calso	726-125	South Prop	N/A	12	30S	21E	MD	35.33336	-119.66342	156-090-17	Steam					Active	6		2" Energy Control Bleed point x3 and 3/4" Energy Control Bleed point x3	< 1	Steam Injector
BL5218	1	McKittrick	Calso	727R-125	South Prop	N/A	12	30S	21E	MD	35.33346	-119.66265	156-090-17	Steam					Active	6		2" Energy Control Bleed point x3 and 3/4" Energy Control Bleed point x3	< 1	Steam Injector
BL5219	1	McKittrick	Calso	728-125	South Prop	N/A	12	30S	21E	MD	35.33325	-119.66169	156-090-17	Steam					Active	6		2" Energy Control Bleed point x3 and 3/4" Energy Control Bleed point x3	< 1	Steam Injector
BL5220	1	McKittrick	Calso	736R-125	South Prop	N/A	12	30S	21E	MD	35.33252	-119.66363	156-090-17	Steam					Active	6		2" Energy Control Bleed point x3 and 3/4" Energy Control Bleed point x3	< 1	Steam Injector
BL5221	1	McKittrick	Calso	737-125	South Prop	N/A	12	30S	21E	MD	35.33267	-119.66267	156-090-17	Steam					Active	6		2" Energy Control Bleed point x3 and 3/4" Energy Control Bleed point x3	< 1	Steam Injector
BL5222	1	McKittrick	Calso	738-125	South Prop	N/A	12	30S	21E	MD	35.33253	-119.66173	156-090-17	Steam					Active	6		2" Energy Control Bleed point x3 and 3/4" Energy Control Bleed point x3	< 1	Steam Injector
BL5223	1	McKittrick	Calso	741-125	South Prop	N/A	12	30S	21E	MD	35.33190	-119.66717	156-090-17	Steam					Active	6		2" Energy Control Bleed point x3 and 3/4" Energy Control Bleed point x3	< 1	Steam Injector
BL5224	1	McKittrick	Calso	742-125	South Prop	N/A	12	30S	21E	MD	35.33192	-119.66640	156-090-17	Steam					Active	6		2" Energy Control Bleed point x3 and 3/4" Energy Control Bleed point x3	< 1	Steam Injector
BL5225	1	McKittrick	Calso	746-125	South Prop	N/A	12	30S	21E	MD	35.33200	-119.66310	156-090-17	Steam					Active	6		2" Energy Control Bleed point x3 and 3/4" Energy Control Bleed point x3	< 1	Steam Injector
BL5226	1	McKittrick	Calso	747R-125	South Prop	N/A	12	30S	21E	MD	35.33196	-119.66252	156-090-17	Steam					Active	6		2" Energy Control Bleed point x3 and 3/4" Energy Control Bleed point x3	< 1	Steam Injector
BL5227	1	McKittrick	Calso	748R-125	South Prop	N/A	12	30S	21E	MD	35.33211	-119.66163	156-090-17	Steam					Active	6		2" Energy Control Bleed point x3 and 3/4" Energy Control Bleed point x3	< 1	Steam Injector
BL5230	1	McKittrick	Calso	758-125	South Prop	N/A	12	30S	21E	MD	35.33134	-119.66163	156-090-17	Steam					Active	6		2" Energy Control Bleed point x3 and 3/4" Energy Control Bleed point x3	< 1	Steam Injector
BL5232	1	McKittrick	Calso	764-125	South Prop	N/A	12	30S	21E	MD	35.33067	-119.66491	156-090-17	Steam					Active	6		2" Energy Control Bleed point x3 and 3/4" Energy Control Bleed point x3	< 1	Steam Injector
BL5233	1	McKittrick	Calso	767-125	South Prop	N/A	12	30S	21E	MD	35.33052	-119.66257	156-090-17	Steam					Active	6		2" Energy Control Bleed point x3 and 3/4" Energy Control Bleed point x3	< 1	Steam Injector
BL5234	1	McKittrick	Calso	768-125	South Prop	N/A	12	30S	21E	MD	35.33066	-119.66170	156-090-17	Steam					Active	6		2" Energy Control Bleed point x3 and 3/4" Energy Control Bleed point x3	< 1	Steam Injector
BL5235	1	McKittrick	Calso	769-125	South Prop	N/A	12	30S	21E	MD	35.33056	-119.66080	156-090-17	Steam					Active	6		2" Energy Control Bleed point x3 and 3/4" Energy Control Bleed point x3	< 1	Steam Injector
BL5236	1	McKittrick	Calso	771-125	South Prop	N/A	12	30S	21E	MD	35.33012	-119.66708	156-090-17	Steam					Active	6		2" Energy Control Bleed point x3 and 3/4" Energy Control Bleed point x3	< 1	Steam Injector
BL5237	1	McKittrick	Calso	773-125	South Prop	N/A	12	30S	21E	MD	35.33005	-119.66558	156-090-17	Steam					Active	6		2" Energy Control Bleed point x3 and 3/4" Energy Control Bleed point x3	< 1	Steam Injector
BL5238	1	McKittrick	Calso	774-125	South Prop	N/A	12	30S	21E	MD	35.33002	-119.66478	156-090-17	Steam					Active	6		2" Energy Control Bleed point x3 and 3/4" Energy Control Bleed point x3	< 1	Steam Injector

