



California Regional Water Quality Control Board

Los Angeles Region



Recipient of the 2001 *Environmental Leadership Award* from Keep California Beautiful

Linda S. Adams
Agency Secretary

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Arnold Schwarzenegger
Governor

January 4, 2007

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Ms. Linda Campion
Associate Oil and Gas Engineer
Division of Oil, Gas, and Geothermal Resources
801 K Street; MS 20-20
Sacramento, CA 95814-3530

PLAINS EXPLORATION AND PRODUCTION COMPANY; SCH NO. 2006121030

Dear Ms. Campion:

Staff of the California Regional Water Quality Control Board Los Angeles Region (Los Angeles Water Board) received the subject Initial Study/Negative Declaration on December 11, 2006. Based on review of the subject document, Los Angeles Water Board staff has the following concern:

- Section 2.7, Hydrology/Water Quality – Pages 20-21; The assessment of the impacts to Hydrology/Water Quality in the referenced Initial Study/Negative Declaration relies on construction of temporary sumps at each pad, existing catch basins to retain stormwater, and Stormwater Pollution Prevention Plan (SWPPP) and Spill Prevention and Countermeasure Plan (SPCC) to conclude that there is No Impact to water quality. Los Angeles Water Board staff note, however, that without quantification of waste generation from project activities, details of sumps to be constructed to manage the generated wastes, engineering analysis of the adequacy of the existing ponds to hold contaminated wastewater and stormwater, review of existing or planned wastewater treatment to treat pollutants of concern, and potential seepage of wastewater and stormwater from unlined ponds to groundwater, the determination of No Impact to water quality does not appear to be supported.

Los Angeles Water Board staff recommends that the details and analysis requested above are included in a revised environmental analysis. If there are any questions, please call Mr. Sam Unger at 213-576-6622.

Sincerely,

Samuel Unger, P.E.
Chief, Regional Programs Section

California Environmental Protection Agency

