

REGION 9 SAN FRANCISCO, CA 94105

March 10, 2025

Sent via email only

Jeff Beecher San Joaquin Refining Company 3500 Shell Street Bakersfield, CA 93388

Dear Jeff Beecher:

The San Joaquin Refining Company (SJR) conducted Step Rate Testing (SRT) for injection well WD-2 in June 2024 and submitted a report to the United States Environmental Protection Agency, Region 9 (EPA) in August 2024. Following several email exchanges regarding the SRT results, the submission of a revised report in September 2024, EPA's receipt of a letter containing fracture gradient recommendations from CalGEM in October 2024, and subsequent discussions between EPA and SJR, EPA is now establishing a revised maximum allowable surface injection pressure (MASIP) for WD-2 of 947 psi.

In addition, EPA is updating the MASIP for SJR's other injection well, WD-1, to 948 psi, which reflects the revised calculation method from EPA's June 2022 major permit modification. However, because SJR's most recent SRT on WD-1 in November 2020 did not reach formation fracture pressure, EPA is establishing 948 psi as a temporary MASIP for WD-1 utilizing the same fracture gradient as was used in setting the MASIP for WD-2 until SJR conducts another SRT on injection well WD-1. To establish a final MASIP for WD-1, SJR must re-test the well and submit the new SRT results to EPA no later than March 7, 2026.

These revised MASIP values for injection wells WD-1 and WD-2 are established in accordance with Part II.D.3.a. of SJR's UIC Permit No. R9UIC-CA1-FY16-1, and they replace the existing injection pressure limits included in Appendix H of the Permit. EPA will post this letter on the EPA Region 9 website at <u>https://www.epa.gov/uic/r9-uic-permits</u>.

Please contact David Albright, Manager of our Groundwater Protection Section, at (415) 972-3971 if you have any questions.

Sincerely, /s/ 2025-03-10 Tomás Torres Director, Water Division cc (via email): Chris Jones, CalGEM Central District Alex Olsen, Regional Water Quality Control Board, Central Valley Region