



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

April 30, 2020

Sent by email only

Helen Ordway  
Delek US (Alon Bakersfield Property, Inc.)  
6451 Rosedale Highway  
P.O. Box 1551  
Bakersfield, CA 93302-1551

**SUBJECT: Minor Permit Modification  
Underground Injection Control (UIC) Permit  
Class I Non-Hazardous R9UIC-CA1-FY18-2  
Alon Bakersfield Property, Inc. (Alon), Bakersfield, California**

Dear Ms. Ordway,

This letter is to notify you that the United States Environmental Protection Agency, Region 9 (EPA) has approved a minor modification to the above-referenced permit. The enclosed minor modification clarifies the permit's step-rate testing requirements and is effective immediately.

This minor modification will also be posted on the Region 9 UIC Permits website at <https://www.epa.gov/uic/uic-class-i-permit-no-r9uic-ca1-fy18-2-alon-bakersfield-property-inc-bakersfield-ca>.

Please call Michele Dermer at (415) 972-3417 if you have any questions.

Sincerely,

DAVID  
ALBRIGHT

Digitally signed  
by DAVID  
ALBRIGHT  
Date: 2020.04.30  
08:46:06 -07'00'

David Albright  
Manager, Groundwater Protection Section

cc w/enc: Clay Rogers, Regional Water Quality Control Board, Central Valley Region  
Cameron Campbell, CalGEM, Inland District

**MINOR MODIFICATION TO PERMIT NO. R9UIC-CA1-FY18-2  
ISSUED TO ALON BAKERSFIELD PROPERTY (ALON)**

In accordance with 40 CFR Part 144.41(a), this permit is hereby modified to correct two typographical errors. Portions of those pages of the permit, as identified below, are revised to incorporate these changes, and will now read as follows (for clarity, changes are shown with removals struck out and new additions in bold, underlined text):

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5. Injection Formation Testing

a. Step-Rate Test (SRT)

- i. Within one hundred eighty (180) days after the effective date of this Permit for the Existing Active Wells, the Permittee shall conduct a SRT on ~~each~~ **one** active well to establish the maximum allowable injection pressure (MAIP) in accordance with Part II.D.3.a. The report shall be submitted to EPA within sixty (60) days of test completion.

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3. Injection Pressure Limitation

For any injection wells authorized pursuant to this Permit:

- a. Maximum allowable injection pressure (MAIP) will be set at 80% of the calculated fracture pressure at the surface without consideration of friction losses, or the maximum safe operating pressure of the injection equipment, whichever is less. The applicable fracture gradient will be based on results of the SRT conducted in ~~each~~ **one** well in the Santa Margarita Formation injection zone under Part II.B.5.a. EPA will provide the Permittee written notification of the MAIP once it has been calculated pursuant to the above restrictions, which will become the enforceable MAIP pursuant to this Permit. Once established, the approved MAIP standard will be added to this Permit as an attachment. The Permittee shall limit injection pressures to the lesser of MAIP or the safe operating pressures, as described in Appendix H of the Permit, until the SRT is conducted and evaluated by EPA.

All other permit conditions remain unchanged.

This minor modification is effective on April 30, 2020

**TOMAS TORRES** Digitally signed by TOMAS  
TORRES  
Date: 2020.04.30 08:08:54 -07'00'

Tomás Torres, Director  
Water Division, EPA Region 9