



HYDRAULIC FRACTURING PERMITTING & COMPLIANCE SERVICES

California's Senate Bill No. 4 (SB 4) is not only the state's first foray into the regulation of hydraulic fracturing (HF) and well acidizing (cumulatively termed as Well Stimulation Treatments or WST) but also represents the country's most stringent legal requirements for well stimulation procedures. Among the requirements are notices to both the California Division of Oil, Gas, & Geothermal Resources (DOGGR) and neighboring land owners, disclosure of HF chemicals, plans for water management and groundwater monitoring, pre- and post-HF water testing, and mandatory 60-day notices of HF completion. As of July 1, 2015 DOGGR implemented the final version of these regulations and now requires a complete environmental review under CEQA including an evaluation of the integrity of all wells within an area of review (AOR) and submittal of casing diagrams for these wells.

InterAct has the experienced personnel to deliver a uniquely comprehensive package of services in order to assist operators in complying with the new regulations. Our in-depth knowledge of oil well construction and design, water well drilling and groundwater monitoring, as well as drilling and production operations makes us uniquely qualified and effective in ensuring our clients' compliance with the increasing complexity of the hydraulic fracturing regulatory framework.

InterAct has filed WST Notices for clients in two areas in California, and was the 2nd company state-wide to successfully obtain a Written Concurrence from the State Water Resources Control Board (SWRCB) for an exemption from groundwater monitoring. InterAct has been conducting South Coast Air Quality Management District (SCAQMD) Rule 1148.2 required reporting since the regulations went into effect in July 2013.

InterAct's Hydraulic Fracturing Regulatory Services

- Preparation and submission of WST notices to DOGGR
- Preparation and submission of 60-day notices to DOGGR after WST completion
- 3rd party representation to notify surrounding land owners
- Preparation and execution of associated groundwater monitoring plans including:
 - Studies proving absence or location of protected water (<10,000 ppm TDS)
 - Research to determine availability of monitoring wells
 - Preparation of programs to convert existing wells into monitoring wells
 - Well sampling, water analysis and data interpretation
 - Reporting to agencies
- Preparation of Written Concurrence applications to SWRCB to exempt from groundwater monitoring
- SCAQMD Rule 1148.2 Data Collection and Reporting:
 - Reporting of well stimulation chemicals for new drills and well workovers
 - Communication with all chemical vendors
 - SCAQMD online database management
- Preparation of water management plans
- Certified Groundwater monitors and Registered Professional Geologists on staff
- Assistance with:
 - Land use permitting
 - Hydraulic Fracturing compliance (County Planning Departments, BLM, US Forest Service, CEQA/NEPA related Hydraulic Fracturing impacts)
 - SPCC plan preparation and additions that include HF fluids containment
 - FracFocus Web-database filing