



IMPERIAL IRRIGATION DISTRICT

April 15, 2010

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REGION 7

Mr. Doug Wylie
California Regional Water Quality Control Board
Colorado River Basin Region 7
73-720 Fred Waring Drive, Suite 100
Palm Desert, CA 92260

Subject: Cease and Desist Order No. R7-2009-0049 Q1-2010 Quarterly Report

Dear Mr. Wylie:

Imperial Irrigation District (IID) is submitting this quarterly report as required in the provisions of Cease and Desist Order No. R7-2009-0049.

IID has evaluated the long term costs of the deep injection well and the wastewater treatment options vs. the "do nothing" option. This evaluation has resulted in the identification of the deep injection well option as the most cost effective solution. A presentation has been developed for the IID Board of Directors, and we expect it to be presented in April of 2010. Upon approval of the deep injection well project by the Board of Directors, IID will submit formal notification to the Regional Water Quality Control Board of the use of the deep injection well approach.

IID has submitted the amended Deep Well Injection Permit Application as requested by the Environmental Protection Agency (EPA). The EPA is working toward submitting the permit for public review.

IID has been in compliance with all interim limits of the Cease and Desist Order over the past quarter, and IID is committed to remaining in full compliance with all of the provisions of the Cease and Desist Order going forward.

If you have any questions, feel free to contact me at (760) 339-0506.

Sincerely,

Michael Taylor
General Supt., Generation Plant
Energy Production

Cc: E. Aghjayan
H. Olstowski
W. Layne
M. Bogart



IMPERIAL IRRIGATION DISTRICT

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June 30, 2010

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REGION 7

Mr. Doug Wylie
California Regional Water Quality Control Board
Colorado River Basin Region 7
73-720 Fred Waring Drive, Suite 100
Palm Desert, CA 92260

Subject: Cease and Desist Order No. R7-2009-0049 – Preliminary Design Submittal

Dear Mr. Wylie,

Imperial Irrigation District (IID) is submitting this preliminary design information (attached) for deep injection well(s) as required in the provisions of Cease and Desist Order No. R7-2009-0049.

As stated in the last quarterly report, IID evaluated the long term cost of the deep injection well and wastewater treatment options. The evaluation identified the deep well option as the most cost effective solution. The injection well option would install US EPA Class I well(s) to inject plant wastewater into deep, isolated rock formations that are thousands of feet below the lower most underground source of drinking water (USDW). Station wastewater will be pumped into wells which are 2,740 to 3,660 feet deep. The design of the well is similar to those used by geothermal power plants in the Imperial Valley for re-injection of brine or disposal of wastewater similar to that at the El Centro Generating Station (ECGS). The deep injection well alternative will require minimal water treatment prior to injection and will produce virtually no significant solid waste as compared to the Wastewater Treatment Option.

The Environmental Protection Agency issued the ECGS injection well draft permit for public comment last month. The public comment period closed on June 29, 2010.

At this time IID does not believe the selection of Injection Wells as the disposal solution will result in any change in schedule as outlined in the Cease and Desist order.

If you have any questions, feel free to contact me at (760) 339-0506.

Sincerely,

Michael Taylor
General Supt., Generation Plant

File: 7A 13 0128 003, IID ECGS



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October 15, 2010

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Mr. Doug Wylie
California Regional Water Quality Control Board
Colorado River Basin Region 7
73-720 Fred Waring Drive, Suite 100
Palm Desert, CA 92260

Subject: Cease and Desist Order No. R7-2009-0049 Q3-2010 Quarterly Report

Dear Mr. Wylie:

Imperial Irrigation District (IID) is submitting this quarterly report as required in the provisions of Cease and Desist Order No. R7-2009-0049.

IID staff presented the Deep Well Injection Project to the IID Board of Directors along with other options staff has evaluated for information. IID has reviewed treatment options using the Crown Solutions approach and has determined that it is not a viable option. The Crown Solution approach could not consistently maintain the effluent limits below the permit limits. IID staff has presented this information to the Board of Directors and recommended the Deep Well Injection Project approach. IID will present the Major Work Authorization for the Deep Well Injection Project to the Board of Directors on October 19, 2010 for information and approval on November 2, 2010.

IID intends to begin construction on the Deep Well Injection Project in January 2011.

IID is committed to remaining in full compliance with all of the provisions of the Cease and Desist Order going forward.

If you have any questions, feel free to contact me at (760) 339-0506.

Sincerely,

Michael Taylor
General Supt., Generation Plant
Energy Production

Cc: E. Aghjayan
H. Olstowski
W. Layne
M. Bogart

IID
WDID: 7A 13 0128 003; El Centro Generating Station (GS); BO: R7-2009-0020
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IMPERIAL IRRIGATION DISTRICT

July 15, 2010

Mr. Doug Wylie
California Regional Water Quality Control Board
Colorado River Basin Region 7
73-720 Fred Waring Drive, Suite 100
Palm Desert, CA 92260

Subject: Cease and Desist Order No. R7-2009-0049 Q2-2010 Quarterly Report

Dear Mr. Wylie:

Imperial Irrigation District (IID) is submitting this quarterly report as required in the provisions of Cease and Desist Order No. R7-2009-0049.

IID staff presented the Deep Well Injection Project to the IID Board of Directors along with other options staff has evaluated for information. The Board of Directors requested that additional options be reviewed due to the significant price of the Deep Well Injection Project. IID is currently in the process of reviewing test results and treatment options with Crown Solutions as part of the Board of Director's request. Upon completion of this work, IID will present information to the Board of Directors recommending either the Crown Solution approach or the Deep Well Injection Project approach. IID will also present to the California Regional Water Quality Control Board the selected treatment approach.

IID is continuing to work towards implementation of the Deep Well Injection Project in tandem with investigation of alternative solutions.

IID submitted the Deep Well Injection Project preliminary design drawings and project description in compliance with the Cease and Desist Order milestone #2 on June 30, 2010. IID is committed to remaining in full compliance with all of the provisions of the Cease and Desist Order going forward.

If you have any questions, feel free to contact me at (760) 339-0506.

Sincerely,

Michael Taylor
General Supt., Generation Plant
Energy Production

Cc: E. Aghjayan
H. Olstowski
W. Layne
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