

Sandridge Partners



Dear Jeff, Bryan

July 3, 2024

I discussed this proposed monitoring and reporting plan with John and we both agreed we cannot sign up to this proposed plan. It is way too onerous with testing and reporting requirements that don't make sense compared to the small size and risk this project presents.

We did a rough estimate of the cost of this proposed MRP and conservatively it approaches a quarter of a million dollars a year (see embedded excel worksheet). If we have to abandon the beef plant project altogether, we will, as we cannot run a profitable business with the overhead, cost and burden that this plan proposes.



Sandridge RWQCB
Proposed Monitorin a

We are working to build a small beef processing plant processing 210 cattle per day. In comparison to other beef processing plants in Kings County, we are much smaller: CVM processes 3,000 cattle per day and Harris beef processes 1,500 cattle per day. The proposed MRP puts us in the same category as these two, in fact the test and monitoring plan is almost identical. And from our perspective the risk we present is much smaller and thus would expect a more reasonable test and monitoring plan and furthermore, we have specified best in equipment and embrace strong wastewater management techniques and practices. Our intent has always been to meet regulatory requirements and we fully expect to when in operation. Please look at the risk table at the end of this document and it indicates that we have a moderate risk program based on scale and amount of wastewater generated.

We would like to suggest an alternative and more reasonable MRP that pushes testing that you have defined as daily to weekly; weekly to monthly; monthly to yearly.

Perhaps we can schedule a meeting so we can discuss this, better present our case and negotiate this MRP to a more reasonable plan. We would also like to include more of your management team in the process:



Sandridge Partners



Attendees from our side:

Matthew Maxson

Kyle Parreira

Mike Nordstrom

Madison Caesar

Attendees from your side:

Jeff Pyle, Bryan Rock

Alex Mohegan

Scott Hatten, Lewis Lummen

Comments on MRP:

1. There are flow meters everywhere indicating a continuous flow process but this wastewater operation will be more of a batch process since it is lower volume and more controlled along the way.
2. Source water will be combined in a large tank for both daily operations and fire safety requirements - so three sources will be one.
3. Testing of monitoring wells should be more of a random sampling especially for those furthest away from the retention ponds.
4. It will take a year or more to hit full capacity of 210 cows per day so volumes and wastewaters will be small at the beginning and thus so should testing.
5. Our LAA is 366 acres compared to Harris' 74 acres – five times the size and this would have significant impact on the disbursement and concentration of wastewater applied to land.



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Assumptions:

On average it takes 350 gallons to process one cow (rinsing, cleaning, etc.)

Level of risk for groundwater contamination is directly proportional to the amount of wastewater produced

To reduce risk level more testing/monitoring is required and testing is proportional to risk level

	Number of Cattle Processed/day	Gallons/day	Gallons/year 250 days	Wastewater gallons/day	Risk Factor
Sandridge	250	87,500	21,875,000	87,500	0.25
	500	175,000	43,750,000	175,000	0.5
	1,000	350,000	87,500,000	350,000	1
Harris	1,500	525,000	131,250,000	525,000	1.5
	2,000	700,000	175,000,000	700,000	2
	2,500	875,000	218,750,000	875,000	2.5
CVM	3,000	1,050,000	262,500,000	1,050,000	3
	3,500	1,225,000	306,250,000	1,225,000	3.5
	4,000	1,400,000	350,000,000	1,400,000	4

