PROBLEMS WHICH HAVE NOT BEEN ADEQUATELY ADDRESSED BY PETRO-THERMO REPORT

1. The thickness of the alluvial cover is unknown at the proposed site. Within Section 16, the thickness ranges from 0 to 130 feet, but it is completely unknown at the proposed site itself.

2. The upper surface of the redbeds is an erosional surface of considerable relief. There is no evidence presented by the report which confirms that the redbed surface slopes directly toward Laguna Plata.

3. The report does not disprove work by Reed (1969) which indicates a bedrock channel which would result in a westward migration of groundwater from Laguna Plata (illustration).

4. The report, Figure 3, shows that the 3,440-foot contour is closed, thus indicating that Laguna Plata is a closed depression. Data on the map shows no justification for closing the contour. The intrepretation shown in Figure 3 is not supported by work by Hunter (1985) or by Geohydrology Assoc., (1979). (illustrations)

5. No evidence is presented in the report which substantiates that the disposal ponds will function properly. In fact the very nature of drilling mud is to cause plugging of natural porosity in sediments.

6. Evaporation of fluids should be calculated for surface area of the disposal ponds and NOT for Laguna Plata.

7. The report does not contain any chemical analyses of water samples from the fluid which will be disposed. The TDS range is reported to be 25,000 to 75,000 ppm but springs at Laguna Plata have less than 9,000 ppm.

8. The concentration of 335,100 ppm reported in report for Laguna Plata is a concentrated brine resulting from evaporation on the lake floor or is a residual concentration from potash discharge by Kerr-McGee

OIL

Case No. 8781 4

Submitted by: Pollution Control

Hearing Date: 4/10/86