

DEC 29 1977

Ref: 8E-PC

Mr. John E. Lang
Coordinator of Environmental Affairs
AMOCO Production Company
Security Life Building
Denver, Colorado 80202

Re: Application for NPDES Discharge
Permit Numbers: UT-0023302
UT-0023311
UT-0023329
UT-0023337
UT-0023345
UT-0023353

Dear Mr. Lang:

Upon receipt of your applications for the above-referenced six oil wells in the Great Salt Lake, an analysis of the Federal Regulations concerning oil wells was done and the following has been concluded: (Enclosed is a copy of the applicable guidelines.)

- (1) It is clear from Definition (b) under Paragraph 435.31 that wells in the Great Salt Lake come under the "Onshore Subcategory;"
- (2) Paragraph 435.32(a) clearly states that no discharge is allowed from these wells;
- (3) The Beneficial Use Category (Subpart E) could conceivably be applicable but it is highly doubtful that a beneficial use could be demonstrated for a well in the Great Salt Lake.

It is our conclusion, therefore, that a permit allowing a discharge is not possible and it is our intention to place the applications on an inactive status.

Should you have any further questions, please call Bob Burm or John Lepley of my staff.

Sincerely yours,

Irwin L. Dickstein
Director, Enforcement Division

Enclosure

cc: Utah State Division of Health

✓ RJBURM:cs:12/27/77:4901