

June 23, 2015

Ms. Pamela Creedon, Executive Officer  
Central Valley Water Quality Control Board  
11020 Sun Center Drive, Suite 200  
Rancho Cordova, CA 95670

Mr. Patrick Pulupa, Advisory Counsel  
State Water Board, Office of Chief Counsel  
P.O. Box 100  
Sacramento, CA 95812

Dear Ms. Creedon and Mr. Pulupa,

Please pause the current enforcement action to issue a Cease and Desist Order against Valley Water Management Company. It is harsh and unnecessary.

I am the owner, operator and sole employee of Bud's Oil Company (BOC). BOC has 5 oil wells, all in the Edison field. Total oil production is <10 barrels per day (bpd); water production at about 100 bpd. I have been in the oil business since my partner purchased his 1st well in 1987 (remainder in 1992). After his passing in 2004, it has been up to me.

This is my livelihood. Because of this business, our daughter was able to attend (and graduate from) a UC school without student loans.

Valley Water is a good company- all my dealings with staff show them to be good stewards of the earth, rule-compliant, nice and caring people. When I have seen the facilities, they have been as neat and clean as one can get in the situation. The greenery of Breckenridge Road near the Race Track Facility is a serene place for man and fauna.

This CDO has created a very real nightmare. All these years Valley Water has provided its members with a necessary service, and suddenly in 2012, everything is different. My pro-rata share of the costs of this since 2014 total \$6753.05 - and I am <1% of usage. Our costs to deal with CDO have caused costs to skyrocket.

I am terrified. If this Order takes effect and irrigation at the Race Track Facility is halted in August, I am out of business. I have no alternative way of disposing of my water. I will have to shut in my wells and look into abandoning them (after spending \$40,000 last year to clean my tanks for testing/inspection). Instead of making a living, I am depleting my savings - another small business eliminated, making all of us a little more dependent on the majors.

We all care about safety (and clean water). You paint a bleak picture, but you may not yet have all the facts. Please be reasonable and let us stay open.

Truly,

Theresa Mitchell  
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