

Premier Pumping Unit Service, Inc.
7613 Norris Road
Bakersfield, CA. 93308
(661) 393-5013

June 25, 2015

Ms. Pamela Creedon, Executive Officer Mr. Patrick Pulupa, Advisory Council
11020 Sun Center Drive, Ste. 200 State Water Board, Office of Chief Counsel
Rancho Cordova, CA 95670 P.O. Box 100, Sacramento, CA 95812
pamela.creedon@waterboards.ca.gov patrick.pulupa@waterboards.ca.gov

Dear Ms. Creedon, Mr. Pulupa, and Regional Water Quality Control Board Members:

I own and operate Premier Pumping Unit Service. Premier has been in business since 1995, with me being the only employee. Premier provides many services to oil companies, as well as owns and operates several small leases in the Edison Field. I rely 100% on my income from oil production and affiliated services that I provide to oil producers in Kern County. Many of my clients own and operate oil leases in the Edison Field, as well.

All of my produced water is disposed of through the Valley Water Race Track Hill district. I have no injection wells, and the DOGGR has stated that it will take a minimum of two years to obtain a permit for injection. If the Water Board shuts down the Race Track Hill Facility, I will be forced to shut in all of my wells. Many of clients will also be forced to shut in their wells, as well. The results of the Water Board shutting down irrigation at the Race Track Hill District will cause me to declare bankruptcy, as I will lose all of my oil revenue along with as a substantial amount of service income.

Additionally, many other small business owners like myself, who provide services to the oil producers in Edison will be adversely affected by the Water Board's decision. Royalty holders who rely on monthly royalty checks to supplement their income will also suffer. As oil producers, we provide an enormous amount of tax revenue to Kern County. That revenue will drastically reduce if we are forced to close our doors, devastating the economy in Kern County. It is also very likely that these leases will end up on the State of California's Orphan Oil Well list, placing the burden of clean up and abandonment on the State. I am simply asking that the Regional Board allow us enough time, as it has with past regulatory changes, to implement alternative water disposal processes.

Sincerely,

John Lowrey