

June 27, 2015

Received  
JUL 2015  
Office of the  
Chief Counsel

Ms. Pamela Creedon, Executive Officer  
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Mr. Patrick Pulupa, Advisory Counsel  
State Water Board, Office of Chief Counsel  
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Dear Ms. Creedon and Mr. Pulupa:

My name is FREDERICK F. JR. NOONAN. I live in LONG BEACH and my family has owned mineral rights in the Edison Field of Bakersfield since 1974. I depend on the royalty check from our production.

The owner of the oil company that I own mineral rights in has informed me that there is an upcoming hearing for a Cease and Desist Order (CDO) for the Valley Water Management Company (Valley Water) scheduled for July 30 or 31, 2015 because of alleged contamination of ground water. She said if the CDO is approved by your Board, Valley Water's member oil producers' wells will be forced to shut in, resulting in complete loss of income for the oil operation, and a loss of income that I depend on.

Valley Water has been on the same site since the late 1950s. They have always complied with the regulatory issues and when faced with NOV's starting in 2012, they voluntarily drilled test wells all around the facility to test the ground water, and we understand that the results do not show an imminent threat to local wells as alleged. They even tested the farmer's well water around the facility and found no problems. Clean, safe water is important to all of us, but I fail to understand why the irrigation practices that have been going on for nearly 60 years must cease immediately when the Regional Water has no solid evidence against Valley Water.

The Regional Board should reconsider this reactionary order for Valley Water to cease all irrigation at the Race Track facility by August 15, 2015. Valley Water and its members have paid a lot of money to demonstrate that these practices are not causing any offsite harm and are exploring other alternatives that would also help those affected by the drought. I was told possibilities are: providing the water for blending and using the blended water on crops, injecting the water into deep aquifers, treating the water for use on a local golf course at the Rio Bravo Country Club, or creating a Salt Management Plan to continue operations at the Race Track site. These are good ideas, but each will take time and money that will not be available if our oil companies are forced to shut down.

In closing, I would appreciate it if you could move this hearing to Kern County so all of us affected can attend the hearing. I may not have a big role in the oil company, but I DO have a VOICE, but the drive to Rancho Cordova to attend a hearing would make it very hard to participate in person.

Respectfully yours,



THIS HAS BEEN IN OUR FAMILY OVER 40 YRS.  
IT IS VERY IMPORTANT TO ALL OF US.  
THANK YOU -