

**Verjill Oil Company  
P.O. Box 1  
Edison, California 93220-0001**

June 29, 2015

Ms. Pamela Creedon, Executive Officer  
11020 Sun Center Drive, Suite 200  
Rancho Cordova, CA 95670

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

Re: California Regional Water Quality Control Board  
Central Valley Region  
Order No. R5-2015-XXXX  
Valley Water Management Company  
Race Track Hill Facility and Fee 34 Facility, Edison, Kern County

Dear Ms. Creedon, Mr. Pulupa, and Members of the California Regional Water Quality Control Board,

I am writing this letter on behalf of our company, Verjill Oil Company. We are a local, independent oil producer in Kern County. This letter is to request the above-referenced Cease and Desist Order (CDO), proposed Order No. R5-2015-XXXX be delayed or substantially modified. We believe if this proposed CDO is approved, the impact on all oil producers that utilize Valley Water Management Company's Race Track Hill and Fee 34 Facilities will be extremely negative as there are no other current alternatives for water disposal. With no alternatives for water disposal, operators will be forced to shut down and oil production will stop. Not only will this cause a huge economic impact on the oil producers, it will cause a rippling wave of negative economic impacts on our employees, town, and local businesses.

We are in the process of applying for an underground injection permit. It is unclear at this time how long it may take to receive approval for this permit. If we are unable to dispose of our water, we will be forced to shut down our field. If we are forced to shut down, this basically puts our company out of business. Our company is a family business and our source of income. The approval of this CDO would be absolutely devastating to our family.

Another reason for not issuing the proposed CDO is the lack of evidence showing a threat to the area's groundwater or surface water as a result of Valley Water Management Company's facilities. We are hopeful you will take this fact into consideration and not issue the CDO as proposed.

I ask that you please take the above information into consideration. Please feel free to contact me by telephone at (661) 301-1501 or email at [oilwife@aol.com](mailto:oilwife@aol.com) with any questions you may have.

Sincerely,



Jill Pickett, Owner  
Verjill Oil Company