

VALLEY WATER MANAGEMENT COMPANY

7500 MEANY AVE.
BAKERSFIELD, CALIFORNIA 93308

November 15, 2017

BY EMAIL AND U.S. MAIL

Mr. Josh Mahoney (Joshua.Mahoney@waterboards.ca.gov)

Mr. Clay Rodgers (Clay.Rodgers@waterboards.ca.gov)

Central Valley Regional Water Quality Control Board
1685 E Street
Fresno, CA 93706

COMMENTS ON ORDER NO. R5-2017-XXXX – AMENDING ORDER NO. R5-2015-0093

Dear Mr. Mahoney and Mr. Rodgers:

Valley Water Management Company (“Valley Water”) appreciates the opportunity to submit comments in support of the adoption of a proposed order amending Water Code Section 13301, Order No. R5-2015-0093, for Valley Water Management Company’s Race Track Hill and Fee 34 facilities in the Edison Oil Field. Since that initial Order was issued in 2015, Valley Water has conducted two pilot projects testing cutting edge technologies designed to treat produced water for all beneficial uses, and has joined and become a voting member of CV-SALTS and the Central Valley Salinity Coalition. Valley Water attends all CV-SALTS meetings and has been an active member of the Salinity Permitting workgroup and the Oil and Gas communications committee.

Valley Water has also drilled and monitored 16 shallow and deep wells at these facilities, and provided quarterly monitoring reports to the Central Valley Regional Water Quality Control Board (“Central Valley Board”), and has completed and submitted all other required reports and plans under the Order. Due to this good record of compliance with the previous Order, Valley Water requests that the previous Order be extended for an additional 18 months to allow the remaining small producers in the Edison Oil Field to continue to utilize these facilities until a beneficial agricultural supply reuse project and underground injection project can be finalized. The remaining small producers have no other back up disposal options and would be forced to shut in their wells, causing economic damage to both the producers and the royalty holders.

These facilities have been utilized since the late 1950s and Valley Water has confirmed that no water wells have been impacted by the activities at these facilities, and will continue to monitor and report quarterly during the extension period.

We sincerely appreciate consideration of this extension and urge the Central Valley Board to approve the proposed amendments to Order No. R5-2015-0093. If you have questions, please contact me by telephone at (661) 410-7500 or by email at remerson@valleywatermanagement.org.

Sincerely,

A handwritten signature in black ink that reads "Russell Emerson". The signature is written in a cursive style with a large initial "R".

Russell Emerson

Manager

Valley Water Management Company

cc: Dale Harvey and Ron Holcomb, CVRWQCB (Dale.Harvey@waterboards.ca.gov,
Ronald.Holcomb@waterboards.ca.gov)
Patrick Pulupa, CVRWQCB (Patrick.Pulupa@waterboards.ca.gov)
Melissa Thorme, Downey Brand LLP (mthorme@downeybrand.com)