

June 30, 2015

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, Ca 95814



Ref: Comment Letter – Model Criteria for Groundwater Monitoring

Ms. Jeanine Townsend:

On behalf of the following organizations we recommend that the State Water Resources Control Board (SWRCB) further clarify the intent of Section 2.1.1 under “Number and Locations of Monitoring Wells (page 9)” of the Draft Model Criteria for Groundwater Monitoring in Areas of Oil and Gas Well Stimulation, to include language that would allow use of any appropriate existing or future groundwater monitoring well to meet the objectives of site specific and overlapping regulatory programs. We believe such an approach will provide efficiencies in implementation of multiple groundwater regulatory programs, including, but not limited to, SB4-well stimulation requirements, the Irrigated Lands Regulatory Program (ILRP), California Statewide Groundwater Elevation Monitoring Program (CASGEM) and the Sustainable Groundwater Management Act (SGMA), allow for greater coordination and multiple beneficial uses of data, while ensuring adequate groundwater monitoring data is maintained.

The following language in bold below, is recommended for inclusion in the last paragraph of Section 2.1.1 of the final regulations.

Water Board staff ~~may~~ **shall** consider proposed alternatives and modifications to the methods described above, based on factors such as site-specific conditions (e.g. terrain, geology, access), number and depth of aquifers containing protected water, and potential risk to receptors (e.g., groundwater resources). **Staff shall also consider proposed regional groundwater monitoring approaches that include multiple uses of groundwater monitoring wells to meet the overlapping requirements of current and future regulatory programs including, but not limited to, SB4-well stimulation requirements, the Irrigated Lands Regulatory Program (ILRP), California Statewide Groundwater Elevation Monitoring Program (CASGEM) and the Sustainable Groundwater Management Act (SGMA)..** A modification must not impair the Water Board’s ability to assess the potential effects of well stimulation treatments as required by Water Code section 10783. ~~Modifications to the methods described above must be proposed by applicant an operator to the Water Boards prior to submitting a final monitoring plan.~~

Thank you for your consideration of this recommendation. We look forward to working with the SWRCB in developing a regional groundwater monitoring program that meets the objectives of these various regulatory programs.

Sincerely,

California Independent Petroleum Association
Independent Oil Producers Agency
Kern County Farm Bureau
Wonderful Orchards

Kern Groundwater Authority
Kern River Watershed Coalition Authority
Grimmway Farms
Western Growers Association