

September 18, 2016

Senator Bill Monning

State Capitol, Room 313

Sacramento, CA 95814

**RE: Opposition to expansion of the Aquifer Exemption Zone, around Arroyo Grande Oil Field**

Dear Senator Monning,

Protect Price Canyon is a group of concerned residents and organizations in the Edna Valley and Price Canyon area. Freeport McMoRan operates the Arroyo Grande Oil Field in our area. In 2014 it was acknowledged that DOGGER had permitted injecting wastewater into sites far outside the establish EPA exemption boundary. DOGGER has submitted a request to the EPA to greatly expand the zone where injection is permitted.

To get the exemption, Freeport McMoRan must prove that the aquifer exemption (and injection) will not harm other water that is used for drinking, agriculture, and other domestic and beneficial uses. It must also show that no one is using the aquifer currently for drinking water. However there are at least 100 water supply wells within a mile of this oil field, but the application didn't show exact map locations or sampling of these wells.

The application also doesn't: Evaluate the impacts of earthquakes (including those that could be caused by wastewater injection); Evaluate whether there is potential for subsidence as water is pulled out of the aquifer; Provide an analysis of the chemical composition of the wastewater injected back into the aquifer. Freeport McMoRan’s application utterly fails to mention the company’s own plans to dramatically expand operations in this same oil field. The company is hoping to drill up to 350 brand new wells (including injection wells) to achieve up to a 10-fold increase in daily oil production. That would, of course, likely also result in a major increase in wastewater production.

The analysis of aquifer exemption is based on current water extraction and injection. Nowhere does the application mention that the company is pursuing this oilfield expansion project. There is no analysis of what will happen to the aquifer if that expansion proceeds—including possible changes in pressure, the potential for inducing fractures, the water quality/chemicals that will be used, etc. The application is relying on a very old EIR that did not consider the extended drought impacts we are currently experiencing.

Also worrisome is that no analysis on the impacts on the water table slopes of the aquifers up hill (upstream) from the oil field was done. Once the aquifer has been exempted, however, that water has been sacrificed to FMOR, and no further review of its hydraulic connection to other groundwater will take place. In a State that increasingly relies on ground water and will very likely face longer and more frequent droughts in the future, this seems like a terrible idea.

We realize you have no direct control over the EPA, however we are respectfully asking for your support that a more thorough study be done prior to abandoning this aquifer forever. May we state on our website that you support us in opposing approval of this Exemption by the EPA without further study? Would you be willing to provide a letter stating you position on this issue?

Respectfully,

Tori Poppenheimer, on behalf of Protect Price Canyon

5060 Pineknolls Dr

Cambria, CA 93428