SRG

Coffee Petroleum, Inc.
24587 Round Mountain Road
Bakersfield, CA 93308
Phone 661.393-0956

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RWQCB-CVR
FRESNO, CALIF.

August 14, 2006

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

Attn: Mr. Shelton R. Gray, Senior Engineering Geologist

Re: Draft Cleanup and Abatement Order
Coffee Petroleum, Inc.
Coffee Lease
Round Mountain Oil Field
Kern County

Gentlemen:

Pursuant to your August 1, 2006, transmittal of the referenced draft, please accept the following as my comments regarding the order.

The Board must consider past, present and future beneficial uses of the produced water. This order does not perform that task. The produced water is very suitable for agriculture, road dust control, water storage ponds for the use of fire control and in addition to enhancing the Poso Creek habitat. Hundreds of trees have been grown with the produced water. A grove of eucalyptus, cotton wood and paulownia trees all have benefited from the use of the water. Regarding dust control it seems unnecessary to use groundwater for putting on the roads when good produced water is available. Wildfires are common in the foothills. The produced water satisfies the need for water storage reserved for the use of fire control. Appropriate storage tanks and open ponds are constructed in order to have water available at any time for the use of wildfire application. This water has been in the past, present and can in the future be supplied by the produced water.

A State off-road vehicle-park is proposed for the area. The park's demand for water has a potential significant impact to groundwater issues. The aquifer recharge is dependent on Poso Creek and channels located in the canyons of the area. It is my opinion that the water within this aquifer would not support the water requirements of the proposed park, existing wildlife and cattle grazing in the area. Water usage for the park from the aquifer would substantially deplete the groundwater.

Oil field operations are located near the boundary of the proposed State off-road vehicle-park. This produced water is of relative good quality. As already stated the water is currently used for agricultural, habitat, dust and fire control. This produced water is potentially a significant future resource for the park.

The quality of discharge of the oil field water is insignificant to the impact of the groundwater. There is no indication of water degradation. The upstream and downstream water analysis does not show that after 70 years of oil field operations a significant change can be identified as a result of oil field produced water discharge. It would be wasteful to pump groundwater for the irrigation of trees, wildlife habitat and dust control use when clearly the oilfield water meets the standards for these uses. The ranchers, oilfield operations and paintball operator are all dependent on the oilfield water for dust control. In addition, treated produced oilfield water is used for many domestic purposes from watering the lawn to household shower and washing.

Less water is going to the ponds as demand for the water is increased. In time, all water would be used by some beneficial use. Presently, authorized by the California Division of Oil, Gas and Geothermal Resources, an oil well is being converted to a wastewater injection well. Upon the completion of the requirements and successful implementation of the injection well all excess water, not going for the purpose of a beneficial use, will be re-injected.

The order does not consider past, present and future beneficial uses of the produced water. The produced water is very suitable for agriculture, road dust control, water storage ponds for the use of fire control and in addition to enhancing the Poso Creek habitat. It does not allow me the time to pursue other options of water use such as for the proposed State off road vehicle park, the current operating Poso Creek Paint Ball and Taylor Ranches.

I hope my comments are helpful. I look forward to further discussion on the project and the beneficial use of the produced water as a usable resource.

Sincerely,
Brett L Cooper
Brett Cooper
President