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SHANNON GROVE
ASSEMBLYWOMAN, THIRTY-FOURTH DISTRICT

March 10, 2014

Mr. Clay Rodgers
Assistant Executive Officer
Central Valley Regional Water Quality Control Board
1685 E Street
Fresno, CA 93706

Re: Issuance of Cleanup and Abatement Orders to Valley Water Management Company

Dear Mr. Rodgers:

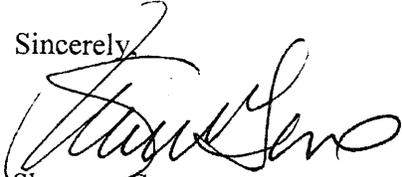
We have been notified that the Regional Water Quality Control Board for the Central Valley Region – Fresno Office (“Regional Board”) is proposing to issue stringent Cleanup and Abatement Orders (“CAOs”) to Valley Water Management Company (“Valley Water”) for its Race Track Hill Facility and for the Fee 34 Facility, which are located in the Edison Oil Field in Kern County. It is our understanding that these orders require Valley Water cease the discharge of waste water that exceeds certain salinity limits, and to clean up and abate any adverse environmental conditions caused by its discharges. It is also our understanding that Valley Water has voluntarily created and plans to implement a work plan to investigate whether its discharges over the last several decades have caused any soil or groundwater degradation. It seems to us that this investigation should precede any enforcement order that presumes such degradation has occurred prior to any evidence being collected to support that presumption.

Therefore, we respectfully request that the Regional Board pause and delay the issuance of any CAOs to Valley Water until evidence has been collected to support a finding of environmental degradation, and until we have had a chance to discuss this matter with Regional Board management to understand the motivations behind and sudden need for this enforcement order that may affect jobs in our district. If Valley Water must cease its discharges, the independent oil producers that rely on this business – many of them being small, family-owned businesses – may have to shutter operations as there will be no other place to take their produced water.

For these reasons, we urge the Regional Board to continue to pursue voluntary and collaborative approaches to dealing with salinity issues, such as those found at the Valley Water sites. We understand that the Regional Board has been working on a Regionwide salinity strategy through its CV-SALTS program, and will be considering a variance/exception program for salinity in June of this year. Since these planning processes may change the water quality objectives applicable to dischargers like Valley Water, which are potentially facing additional treatment

requirements, we ask that the Regional Board consider these types of collaborative approaches to salinity controls instead of automatically pursuing administrative enforcement activities.

Sincerely,



Shannon Grove
Assemblywoman, 34th District

Cc:

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