

12/4/07 Bd. Mtg.
Water Recycling Policy
Deadline: 10/26/07 by Noon

From: "R L Schafer" <rschafer@rlsmap.com>
To: "Jeanine Townsend" <commentletters@waterboards.ca.gov>
Date: Thu, Oct 25, 2007 10:19 AM
Subject: SWRCB, Proposed Water Recycling Policy

The Cawelo Water District (CWD) in Kern County has for many years utilized oilfield produced water, blended with other sources of surface water, for irrigation of crops in CWD as regulated by Waste Discharge Requirements (WDRs) of the Central Valley Regional water Quality Control Board (RWQCB) in conformance with the Tulare Lake Basin Plan.

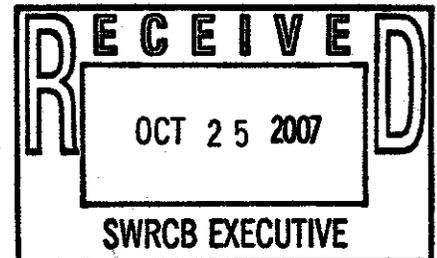
The CWD has about 34,000 acres of irrigated crops of which 82 percent are permanent plantings. During the last 10-years oilfield produced water has provided nearly twenty-five percent of the surface water supply used for irrigation of crops in CWD.

We are greatly concerned that the proposed "Water Recycling Policy" would somehow be interpreted as applying to the oilfield produced water conservation projects of Chevron, Valley Waste Disposal Company and Cawelo Water District.

Although we have talked with staff of the RWQCB and SWRCB and have been assured the "Water Recycling Policy" was not intended to apply to the recycling and conservation of oilfield produced water, we request the record show that oilfield produced water reclamation is not included under or exempt from the proposed "Water Recycling Policy" and will continue to be regulated by the RWQCB and the Basin Plan.

R. L. Schafer
R. L. Schafer & Associates
2904 West Main Street
Visalia, CA 93291

(559)734-1348
(559)734-1413/Fax
rschafer@rlsmap.com



CC: "David Ansolabehere" <dansolabehere@cawelowd.org>, "Hamilton, Scott" <ScottH@paramountfarming.com>, <jimwaldron@chevrontexaco.com>, <Jim_Robinson2@oxy.com>