



May 11, 2015

Board of Supervisors, County of Santa Barbara
105 East Anapamu Street
Santa Barbara , CA 93101

Re: Aquifer Exemption Hearing – ERG Comment

To Whom It May Concern,

With regards to Item 8 (Oil and Gas Wastewater Injection Wells in Santa Barbara County, 15-00386) on the May 12, 2015 Board of Supervisors hearing agenda, ERG respectfully submits the following comments.

Attachment 4 of the Briefing on Oil and Gas Wastewater Injection Wells includes a table of eleven wastewater disposal wells identified by DOGGR for investigation because they are injecting into aquifers that have not been formally made exempt from protection as sources of drinking water. ERG is the operator of record for five of the eleven wells. However, and as noted in the Briefing on Oil and Gas Wastewater Injection Wells, “none of these wells are injecting into aquifers designated as underground sources of drinking water” for these reasons:

- **Casmalia wells Peshine 1A, Peshine 46 and Tompkins 7** – The DOGGR has determined that there are no fresh water bearing strata in this area. Additionally all recent water tests indicate that water in the injection zone has TDS greater than 10,000 mg/L and as such is not acceptable for use as drinking water per federal standards.
- **Cat Canyon well Williams Holding C. H. 2** – Since acquiring ownership ERG has not injected water into the well. DOGGR has approved a permit to plug the well.
- **Cat Canyon well Cantin 39** – As noted in Attachment 4, the well is erroneously included in this list as it is clearly in the exempted area.

ERG recognizes the importance of protecting groundwater and will continue to work with all regulatory agencies to ensure that our operations remain compliant with all applicable laws and best operating practices.

Sincerely,

Ben Oakley
ERG California

Cc DOGGR District 3
County of Santa Barbara Energy Division