

From: Bob Gore
To: commentletters
Cc: [Townsend, Jeanine@Waterboards](mailto:Townsend.Jeanine@Waterboards)
Subject: Comment: CVWB Salt & Nitrate Control BPA
Date: Wednesday, August 8, 2018 12:53:20 PM
Attachments: [image001.png](#)



Ms. Townsend,

The California Independent Petroleum Assn. (CIPA) participated in and supports the CV-SALTS BPA.

CIPA's 450 members are mostly medium and small employers living and working in the CV-SALTS program region. We work hard daily providing California energy for Californians, and good-paying jobs.

We will work with the CVWB and our fellow stakeholders to provide our extensive hydrogeologic knowledge for CV-SALTS.

Water is a by-product of California oil production. For every barrel of oil, there are about 15 barrels of water produced, or about 130 billion gallons annually. The vast majority of this water is recycled directly for further production.

About 8 percent of the produced water is treated and blended for agricultural use in irrigation under state-approved permits. This recycling has taken place for more than 30 years without incident and with no evidence of contamination.

With regard to the BPA, specifically, we support utilizing existing data and research. Data harvesting must be efficient and effective. We are pleased to note the addition of SWRCB's USGS RMP and general GSA inputs, as well as other existing databases, as CV-SALTS sources.

We will work with staff to incorporate CIPA members' data and that of other agencies, such as the Dept. of Conservation. And it is good to see the DOC added as an agency to be consulted. We will work to specify and focus any broad data-gathering efforts for the entire Central Valley surface and ground waters.

We will work with the water boards to persuade the Legislature to assist in funding various CV-SALTS projects. This is a public health program and continuing General Fund support is wholly appropriate.

Cordially,
Bob

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