To: Engelman, Alexa[ENGELMAN.ALEXA@EPA.GOV]; Moffatt, Brett[Moffatt.Brett@epa.gov]
From: Dermer, Michele
Sent: Fri 2/26/2016 8:53:49 PM
Subject: FW: Aquifer Exemption

Another comment letter

From: Dermer, Michele
Sent: Friday, February 26, 2016 12:18 PM
To: McWhirter, Lisa <McWhirter.Lisa@epa.gov>; 'Anna Weber' <Anna.Weber@cadmusgroup.com>; Shari.Ring@cadmusgroup.com
Subject: FW: Aquifer Exemption

And its only noon.

From: Ex. 6 - Personal Privacy
Sent: Friday, February 26, 2016 12:16 PM
To: Albright, David <Albright.David@epa.gov>; Dermer, Michele <Dermer.Michele@epa.gov>; Robin, George <Robin.George@epa.gov>; Kobelski, Bruce <Kobelski.Bruce@epa.gov>
Subject: Aquifer Exemption

I am a resident of San Luis Obispo and I am writing to ask that to deny an exemption to Freeport to expand their operations and to use our beautiful community as a dumping ground for their waste water for the following reasons:

Freeport and DOGGR have failed to demonstrate that the aquifer meets the federal or state criteria for exemption.

- Neither Freeport nor DOGGR have met their burden of demonstrating that the aquifer cannot be used for beneficial or domestic purposes, or that it is hydraulically

isolated from other current or future beneficial use or domestic water sources.

- The proposal threatens drinking water because state officials failed to adequately map nearby water wells, and different maps provided by the state actually show different aquifer boundaries.

- the EPA should consider contamination threats to nearby drinking water wells.

- State officials have failed to acknowledge water wells within or very near the proposed aquifer boundary.

- The EPA must protect the water supplies of people living near this oil field.

- State officials have also failed to demonstrate that the proposed exempted area is hydraulically isolated from drinking water supplies.

- The claim that boundary conditions create an impermeable hydraulic barrier that would preclude the intercommunication of drinking water aquifers with oil field activities is unsubstantiated by any physical tests or computer simulations.

- Freeport McMoRan's application also fails to mention the company's own plans to dramatically expand operations in this same oil field.

o The company aims to drill up to 350 new wells (including injection wells) to achieve up to a 10-fold

increase in daily oil production. That would likely also result in a major increase in wastewater production.

o The analysis of aquifer exemption is based on current water extraction and injection. Nowhere does the application mention that the company is pursuing this oilfield expansion project.

o There is no analysis of what will happen to the aquifer if that expansion proceeds—including possible changes in pressure, the potential for inducing fractures, the water quality/chemicals that will be used, etc.

- DOGGR has failed to demonstrate that the aquifer meets federal and state criteria for exemption under the Safe Drinking Water Act

- DOGGR has not shown that it has the will or ability to effectively ensure that wastewater injection will not affect nearby water wells or beneficial use water.

- California's historic drought and need for water call into question the antiquated criteria used to determine whether groundwater should be sacrificed to the oil industry.

- California's drought is dire, and we need to protect our water from oil industry pollution.

- The EPA needs to halt this irresponsible effort to give away our precious water supplies.

- The EPA must protect the health and environment of

Californians, especially those living near the AGOF, and deny this exemption.