

October 24, 2019

Walt Plachta
Engineering Geologist
Central Valley Regional Water Quality Control Board
1685 'E' Street
Fresno, CA 93706

SUBJECT: CENTRAL VALLEY SALINITY ALTERNATIVES FOR LONG-TERM SUSTAINABILITY (CV-SALTS) EXECUTIVE COMMITTEE REVIEW OF SENECA DE-DESIGNATION PROPOSAL FOR SOUTH LOST HILLS OILFIELD LOWER TULARE AND ETCHEGOIN FORMATIONS

Dear Mr. Plachta,

On September 19, 2019, the CV-SALTS Executive Committee (EC) reviewed and discussed the *Technical Report in Support of Petition for Beneficial Use De-Designation and Basin Plan Amendment: South Lost Hills Oilfield, Lower Tulare and Etchegoin Formations* (Seneca Resources, April 17, 2017), as it related to CV-SALTS salinity goals and ongoing salt planning efforts.

Richard Meyerhoff, Ph.D., the Technical Project Manager for the CV-SALTS program under contract to the Central Valley Salinity Coalition (CVSC) reviewed the proposed BPA. Dr. Meyerhoff's review found that the planned de-designation was generally consistent with the technical approach used to support the de-designation of AGR and MUN from a delineated portion of the groundwater underlying the Tulare Lakebed, a de-designation previously supported by CVSC and approved by the Regional and State Waterboards. Further the review indicated that neither the technical approach nor proposed outcome appears, in this instance, to be inconsistent with the salt planning efforts expected to be implemented in the Salinity Prioritization and Optimization Study (P&O Study) Workplan currently under review by CV-SALTS.

Based on this review of the BPA, the presentation made at the September 19, 2019, Executive Committee, and the lack of any significant concerns from EC members or the public, CV-SALTS EC finds the proposed de-designation is consistent with the goals and plans of the CV-SALTS program. CV-SALTS is aware that several other de-designations are being proposed by other Oil and Gas facilities and encourage them to cooperate and coordinate to reduce the burden on CV-SALTS and the Regional Board in review. Additionally, future proponents of proposed de-designations should work with the CVSC in advance to help ensure that the collective impacts of oil and gas de-designations are not inconsistent with the P&O Study Workplan.

As a final note and as identified in the CV-SALTS BPA, any de-designated areas must continue to participate in the P&O Study identified in the recently adopted Central Valley Region Salt Control Program. Please contact us if you have any questions.

Sincerely

Parry Klassen
Chair, CV-SALTS Executive Committee

Cc:
Ben Elmore, Seneca
Wayne Whitlock, attorney for Seneca
Clay Rodgers, Assistant Executive Officer, CVWB
Anne Walters, Central Valley Regional Water Quality Control Board