

Water

The SLO County Land Use Ordinance chapter on Petroleum Resource Development states, "The fresh water supply must be fully protected from pollution by petroleum operations." According to The Huasna Valley Association's consulting hydrologist, Dr. Robert Curry, this project could potentially result in significant contamination of groundwater because re-injected hot water could cause oil and produced water, with its associated hazardous material contaminants, to seep upward into the local domestic wells and the groundwater basin.

The existing oil seep at the project site, whether it is natural or the result of a leaking abandoned oil well, represents a direct connection between the oil bearing formation and the surface and demonstrates the tendency for upward seepage of oil. The nature of this seep should be investigated as part of the EIR.

Any potential for pollution of our groundwater is an unmitigatable environmental impact of this project. Therefore the EIR must analyze the issue of ground water very carefully and not just rely on a peer-review of Excelaron's questionable hydrology report.

Excelaron has supplied some analysis of water in the oil seep. Unfortunately they measured the gasoline component of total hydrocarbons and not the crude oil component, concluding that the seep contained no hydrocarbons, even though tar was found floating on the water surface.

The EIR consultant should conduct baseline sampling of hydrocarbons and volatile compounds, using proper sampling protocol, of the fluids in the existing oil wells, the oil seep, and a number of groundwater monitoring wells whose position should be determined by an un-biased hydrology study.

It is vitally important that baseline data of existing water quality be measured and that extensive monitoring be established in order to protect our fragile water supply.