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**VIA EMAIL**

Dear Editor:

A recent story, [As California oil regulator seeks more money, legislators ask “Is this working?”](#) (February 28, 2018), included significant factual errors and omissions about the highly regulated process of oil and natural gas production.

Most notably, the reporter claimed that produced water from oil and natural gas production is being injected into “drinking water supplies.” This is patently false. None of the zones currently permitted or being reviewed by the US EPA for injection contain water suitable for drinking or irrigation. Instead, regulatory agencies permit produced water injection into hydrocarbon formations or other approved zones that are not used to supply public drinking water systems. The Division of Oil, Gas, and Geothermal Resources (DOGGR), the State Water Resources Control Board, the Central Valley Regional Water Quality Control Board, the California Environmental Protection Agency and water utilities have investigated this often-repeated claim of activists and found no evidence that produced water has impacted municipal drinking water quality in California.

Water suppliers test and report on their water quarterly under the Safe Drinking Water Act, and these tests across the state demonstrate that oil and natural gas production does not impact our drinking water quality. These reports are publicly disclosed and available, so members of the public can verify the quality of water delivered by their local water provider.

Underground hydrocarbon formations throughout California naturally contain a mixture of water, oil and natural gas. Oil and gas producers pump this mixture to the surface and remove the hydrocarbons. The residual water is typically reinjected for improved oil recovery or for disposal into approved zones in or around active oil and gas fields. The reporter omitted that every injection well is specifically permitted and regulated. The reporter also incorrectly referred to underground injection as a form of well stimulation, which further confuses readers. These are separate activities that are specifically permitted for different purposes under separate laws and regulations.

Prior to being able to reinject produced water, operators must apply for and receive a permit for an injection well which specifies the zone where the water may be injected. Some of these zones are hydrocarbon formations and others contain water with lower salinity, but these zones do not supply drinking water to municipalities or other public water systems. The agencies involved, including DOGGR, the State Water Board and the U.S. Environmental Protection Agency, have strict criteria to maintain public drinking water quality. Our member companies rely upon the expertise of highly-skilled scientists, such as geologists, geochemists, hydrologists, and petroleum engineers, to ensure that

the environment is protected and that producers adhere to the comprehensive array of laws and regulations that govern all aspects of oil and natural gas production in California.

Activists rely on errors and omissions like those in the Cal Matters article to promote a misguided “keep it in the ground” campaign, but that does not keep commuters from having to drive their cars to get to work, keep consumers from using their electronic devices, or stop Californians from using hundreds of petroleum-based products such as contact lenses and vitamins that are essential to our daily lives.

The vast energy demands of our state cannot be met in a sustainable or environmentally-conscious manner without local oil and natural production under California’s leading safety, labor, human rights and environmental standards. Unfortunately, our state has set record levels for dependence on imported energy, which degrades the environment, threatens the affordability and reliability of our energy supply for disadvantaged communities, and makes all Californians more vulnerable to global turmoil, natural disasters, dramatic price spikes and even rationing.

Imported oil must be transported here by tanker ships, which have an adverse impact on air quality and could pose a threat to marine life. Each supertanker siphons jobs, taxes, technology and investments directly from working Californians to foreign countries that do not apply California’s stringent environmental protections, or even recognize basic human rights.

Affordable and reliable energy is an essential element to improve the quality of life for Californians from our diverse communities. Impartial studies by the U.S. Energy Information Administration, the California Energy Commission and the International Energy Agency conclude that responsibly-produced petroleum will continue to be an important part of our diverse energy portfolio for decades to come. Responsible leaders recognize the importance of sustaining oil and natural gas production here in California under the planet’s strictest standards, instead of leaving the fate of our energy supply to countries that do not have the Golden State’s economic, environmental or humanitarian interests in mind.

Sincerely,

A handwritten signature in black ink, appearing to read "Rock Zierman". The signature is stylized with a large, sweeping initial "R" and a long horizontal stroke extending to the right.

ROCK ZIERMAN  
Chief Executive Officer, California Independent Petroleum Association