

Excelaron claims that there isn't a connection between the layer where they are going to extract the oil and the surface layer where our drinking water aquifer lies, but there is a reason for the name Tar Springs. There are a half dozen documented tar seeps in the area including one at their shipping site and one in the Huasna River just upstream from the bridge Excelaron's oil trucks will cross.

There are definitely natural connections between the two layers and if Excelaron starts pumping hydraulic fracturing fluids and diluents and hot water or steam into the ground there is a good chance our groundwater will be polluted. The EIR should evaluate the existing seeps, especially the seep at the shipping site and analyze the potential for contamination of our fragile drinking water supply.

Also, nowhere in the project description does it explain where the water will come from to drill the initial four wells? If they plan to use produced water to drill the additional 8 wells plus an injection well, how will it be handled since it can contain hazardous materials?

Also, although getting baseline data for the quality and quantity of the Huasna aquifer and requiring monitoring for pollutants should be required of this project, they should not be considered as mitigations of any impact to groundwater because neither actually mitigates the significance of pollution.

The County Land Use Ordinance says the freshwater aquifer must be protected from Petroleum extraction. The EIR should not allow the use of any hydraulic fracturing fluids, diluents, or chemical of any sort and if there is potential for groundwater contamination it should be considered an unmitigatable significant impact.