



CFROG Protecting Our Air, Water, and Climate

August 23, 2021

Ms. Jackie Lozano, Clerk of the Board for
Mound Basin Groundwater Sustainability Agency
P.O. Box 3544
Ventura, CA 93006

Re: Mound Basin Groundwater Sustainability Plan

We appreciate the opportunity to comment on the Mound Basin Groundwater Sustainability Plan (MBGSP). With oil well infrastructure in Ventura County existing in close proximity to our groundwater supplies and oftentimes intersecting with aquifers directly, we are submitting the attached map and information to include in the MBGSP for a comprehensive consideration of the Mound Basin setting.

This map illustrates the proximity of Mound Basin water wells to abandoned oil well sites in the Mound Basin area specifically. The sources for the data is:

1. Department of Conservation, Geologic Energy Management Decision (CalGEM). "Oil and Gas Wells GIS, California." [Gis.conservation.ca.gov](https://gis.conservation.ca.gov), 14 Aug. 2021, gis.conservation.ca.gov/portal/home/item.html?id=335e036c6a4f4cc39148ca2a9e0389c7
2. Department of Conservation, Geologic Energy Management Division (CalGEM). WellFinder (WellSTAR), maps.conservation.ca.gov/doggr/wellfinder

Of note:

1. 30 abandoned well sites located in the vicinity of the Mound Basin water wells have been designated as poorly abandoned due to age.
2. 8 of those wells have documented problems as reported in the CalGEM WellSTAR (Well Statewide Tracking and Reporting System).

These older abandoned oil wells were not capped to today's standards. As they continue to age, they are at greater risk of cracks and leaks due to cement degradation; possibly providing for migratory pathways through the layers of caprock. As noted in the United States Geological Survey (USGS) "Supplemental Information to the Groundwater Quality of Aquifers Overlying the

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Ms. Jackie Lozano
Mound Basin Groundwater Sustainability Agency
Page 2
August 23, 2021



Oxnard Oil Field, Ventura County, CA" to the "Groundwater quality results from the Regional Monitoring Program study of the Oxnard oil field" published in 2019:

Additional pathways of poor water quality from the semi-perched zone to the Oxnard aquifer include movement through abandoned or improperly constructed wells (Izbicki, 1996), and lateral seawater intrusion along the coast resulting from landward pressure gradients (United Water Conservation District, 2016).

With seawater intrusion, earthquake faults, contamination sites and plumes referenced and/or reviewed in the MBGSP, in order to reflect the Mound Basin setting in its entirety, it is critically important that oil well infrastructure information also be included in the MBGSP.

Thank-you,
Merrill Berge
CFROG Board Chair

