California Groundwater Association

P.O. Box 14369 • Santa Rosa, CA 95402 • (707) 578-4408
Fax: (707) 546-4906 • email: wellguy@groundh2o.org • Website: www.groundh2o.org
An NGWA Affiliate State

Established 1948

CGA MISSION

Caring for California's Groundwater Resources

Giving high quality service to members and the public

Acting in the best interest of the groundwater industry

January 27, 2010

California Air Resources Board
Mary Nichols, Chairman
1001 I Street
Sacramento, CA 95814

Dear Chairman Nichols and Board members:

Re: Request approval of 2-engine water well drilling rigs rule changes & approval of time extensions for Tier 0 engines.

The California Groundwater Association urges you to approve the two staff proposals regarding 2-engine water well drilling rigs and compliance time extension for certain Tier 0 engines that will be heard by the Board tomorrow.

Over a year ago we requested compliance time extensions for the groundwater industry that was trying to meet water needs in the midst of a drought (the recent storms have been helpful but we will need more precipitation to end the drought) while attempting to comply with multiple CARB regulations. Since January of last year members and staff of the California Groundwater Association (CGA) have been meeting with CARB staff dealing with the on-road, off-road and portable engine rules. Early on we discussed the similarity of drill rigs with deck engines to the two-engine crane provisions in the off-road rule.

At mid year we alerted you to the potential of losing one third of the state's water well drilling rigs as their deck engines would be banned at the end of 2009. Subsequent work with CARB staff has resulted in the 2-engine water well drilling rig provisions now before the Board for approval. Your approval will prevent the major reduction of the drill rig fleet and provide more time to comply, especially in the hard economic times we are facing.

While saving the drill rigs is a major step, our industry still has older equipment with few hours of use that will benefit from the extension of time on Tier 0 engines. Thus we support that proposed amendment as well.

We have not asked for exemptions for the groundwater industry but more time to comply with all three of the CARB rules affecting the groundwater industry. We will continue to work with CARB staff to protect air quality. Your approval of the proposed amendments will allow the continued supply of groundwater needed for our citizens and help promote economic recovery.

Sincerely,

J. Michael Mortensson
Executive Director