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Water is essential for life,
and water is a key component in Oil and Gas production.

All the residents of Sandoval County need the protection of this Ordinance,
But, Oil and Gas production in the Albuquerque Basin presents some special issues.

Picture not a single oil well, but an oilfield of 1500 wells sitting atop the Albuquerque Basin Aquifer.

In this Draft Ordinance, there is no Special consideration for drilling and production in the Albuquerque Basin here in southern Sandoval County. The Albuquerque Basin Aquifer is the sole groundwater source for a vast number of people in Sandoval, adjacent Counties, and the sovereign nations in the Basin. Without strong protections for that groundwater as it flows through Sandoval County, the County will have substantial legal exposure.

The Ordinance should ask for a Water Availability Assessment to determine the availability of and impacts to fresh water surface and subsurface resources. The oil and gas industry takes and makes unusable large quantities of water. An oilfield of 1500 wells would remove more than 5 billions gallons of water. More than Rio Rancho uses in a year, and Bernalillo uses in ten years. The ordinance should require the County to be assured of the legal and physical availability of water for the proposed operations, and to be assured of an acceptable level of impact to current and potential future users of that water.

Water pollution from Oil and Gas activities is not just a remote possibility. Even a 1% likelihood of a single oil well causing aquifer pollution would predict 15 cases of groundwater pollution in a 1500 well oilfield.

There is no provision in the Draft Ordinance for groundwater monitoring. Baseline water samples should be taken before oil operations begin and periodically during production and post -production. There should be quantitative thresholds for key impurities. Such measurements protect the industry as well as the citizenry from legal debates when something questionable is detected. Without ongoing monitoring, the requirements of the ordinance and promises by the applicant are meaningless.

So.....

The current draft Ordinance is not ready for "prime time". There is a lot of work to be done.