



Mr. Jack Van Streenburg  
Executive Director & Chief Safety Officer  
Federal Motor Carriers Safety Administration  
United States Department of Transportation  
1200 New Jersey Avenue SE  
Washington, DC 20590

Dear Mr. Streenburg:

On behalf of the National Ground Water Association (NGWA), and its more than 10,000 members nationwide, we are writing to request an exemption from the Federal Motor Carriers Safety Administration (FMCSA) from the requirements of the Entry Level Driver Training (ELDT) for individuals operating class B ground water well drilling rigs.

Ground water well drilling rigs, meaning per FMCSA definition, *“any vehicle, machine, tractor, trailer, semi-trailer, or specialized mobile equipment propelled or drawn by mechanical power and used on highways to transport water well field operating equipment, including water well drilling and pump service rigs equipped to access ground water.”*

NGWA is the country’s largest professional association representing water well contractors, groundwater scientists, and manufacturers and suppliers of groundwater technology. Our members serve the 42 million Americans who rely private water wells for safe and clean water, most of which live in small and often underserved rural communities. Another 90 million Americans receive water from publicly supplied municipal or community water wells.

Currently, due to increasing demands for groundwater and private water wells, coupled with labor and supply shortages, most water well contractors are facing severe delays in providing their customer’s water. These delays in drilling new wells can be as long 6 months, and much of this delay is due to labor shortages within water well contracting firms.

Rural America is heavily reliant on private water systems to provide them with clean and safe drinking water. And, to meet these demands our nation’s water well contractors must find new ways to increase their productivity and manpower. Because most water well firms are closely held family businesses, additional FSMCLA requirements and regulations can be especially onerous on their day-to-day operations.

Exempting those operating class B water well drilling rigs from the additional requirements of ELDT and allowing them to receive on the job safe driving training before taking their CDL exam could save hundreds of hours each year for water well contractors. Hours that could be utilized to better serve rural America by providing them with the clean, safe, and affordable water that they rely on every day.

We hope this request will be taken under consideration and we look forward to continuing the conversation on how to better serve those who rely on private water wells. For more information and questions regarding this request please contact NGWA Government Affairs Manager, Ben Frech at [bfrech@ngwa.org](mailto:bfrech@ngwa.org) .

Sincerely,

A handwritten signature in black ink, appearing to read "T. Morse".

Terry S. Morse  
Chief Executive Officer  
National Ground Water Association

A handwritten signature in black ink, appearing to read "Brian M. Snelten".

Brian M. Snelten, PG  
President  
National Ground Water Association