

April 3, 2017

Marc Traut
Renaissance Petroleum, LLC
P.O. Box 20456
Bakersfield, CA 93390

Subject: **Planning Director Decision:**
Modified Conditional Use Permit (CUP) for the Renaissance Petroleum
Project
Case No. PL14-0103
3214 Etting Road
Assessor's Parcel Number 232-0-062-030 (APN 232-9-062-034 is the
APN for the subsurface mineral rights)

Dear Mr. Traut:

By the authority granted to me by the Ventura County Administrative Supplement to the California Environmental Quality Act (CEQA) Guidelines (2010, Chapters 3 and 8), Ventura County Non-Coastal Zoning Ordinance (NCZO) (2014, § 8111-1.2 et seq), and based on the information provided in the staff report and at the February 23, 2017, public hearing on this matter, I hereby:

1. **CERTIFY** that I have reviewed and considered the staff report and all exhibits thereto, including the proposed MND Addendum, and have considered all comments received during the public comment process;
2. **FIND** that none of the conditions described in Section 15162 of the CEQA Guidelines calling for the preparation of a subsequent MND have occurred;
3. **APPROVE** the MND Addendum as satisfying the environmental review requirements of CEQA;
4. **MAKE** the required findings to grant a modified CUP pursuant to Section 8111-1.2.1.1 of the Ventura County NCZO, based on the substantial evidence presented in Section E of the staff report and the entire record;
5. **GRANT** modified CUP PL14-0103, subject to the conditions of approval; and



- 6 **SPECIFY** that the Clerk of the Planning Division is the custodian, and 800 S. Victoria Avenue, Ventura, CA 93009 is the location, of the documents and materials that constitute the record of proceedings upon which this decision is based.

As stated in NCZO § 8111-7.3, by April 13, 2017 at 5:00 p.m. (i.e., within 10 calendar days of the conditional approval of the Minor Modification of the CUP, after accounting for holidays and weekends), any aggrieved person may file an appeal of the conditional approval of this decision with the Planning Division who shall set a hearing date before the Planning Commission to review the matter.

The effective date of this decision is April 13, 2017, unless an appeal is filed within the specified appeal period.

Pursuant to CEQA Guidelines [§ 15164(c)], the addendum to the Mitigated Negative Declaration (MND) does not need to be circulated for public review, and shall be included in, or attached to, the adopted MND.

By April 20, 2017 (i.e., within five working days following the effective date of this Minor Modification of the CUP), you must pay to the Ventura County Clerk a \$50.00 Ventura County Clerk filing fee, in order to file the CEQA Notice of Determination for the Addendum to the MND. The Notice of Determination that was filed with the initial MND and the receipt indicating that the initial California Fish and Wildlife fee was previously paid, must also be included. If these documents are not included, you must pay to the Ventura County Clerk a \$2,216.25 fee (California Department of Fish and Wildlife CEQA filing fee), in order to file the CEQA Notice of Determination for the Addendum to the MND.

Please contact your case planner to file the CEQA Notice of Determination for the Addendum to the MND.

Upon satisfying the "prior to Zoning Clearance" conditions, you may obtain a Zoning Clearance from the Planning Division and apply for any necessary Building Permit with the Resource Management Agency, Building and Safety Division. Approval of the Modified CUP does not constitute approval of a Building Permit. A separate application for a Building Permit must be submitted to the Building and Safety Division, following the issuance of the Zoning Clearance. Note that the California Division of Oil and Gas and Geothermal Resources (DOGGR) requires a Zoning Clearance issued by the County prior to permitting any new oil well.

The modified Conditions of Approval are attached to this letter. The following revisions were made to the Conditions of Approval based upon the public comments received:

- Condition of Approval No. 1 was revised to include the following language:

- *All produced fluid tanker trucks associated with the proposed project shall exclusively use the segment of Etting Road located east of the Naumann Lease facility to connect to roads included in the County Regional Road Network. Project-related tanker trucks shall not travel on Dodge Road or the portion of Etting Road located west of the Naumann Lease facility site.*
- *A maximum of 3 truckloads of produced fluid shall be exported from the Naumann Lease site in any one hour.*
- *Hydraulic fracturing, acid well stimulation, and other "well stimulation treatments", as defined in Public Resources Code Section 3157, are not included in the proposed project. The use of any such well stimulation treatment as part of the project would require a subsequent discretionary modification of the CUP, additional environmental review under CEQA, and a public hearing.*
- Condition of Approval No. 36 was revised to replace the term "plot plan" with "site plan". Additionally, the following statement was added:
 - *For purposes of the condition, ancillary pipelines are pipelines and flowlines connecting a well to tanks or production facilities.*
- Condition of Approval No. 59 was revised to include the following language in the Purpose section of the condition:
 - *Communication is necessary between the two parties to avoid potential conflicts with pesticide applications.*

Additionally, the Requirement section now includes "and maintain" in the statement.

- Condition of Approval No. 60 was revised to include the following language in the Purpose section of the condition:
 - *Dust is harmful to agricultural resources as particulates can contaminate crops, spread disease and disrupt photosynthesis in plants.*

Please refer to the County of Ventura's One Stop Permitting website for further information and guidance with completion of the "prior to Zoning Clearance" conditions. This website can be accessed at: <http://onestoppermit.ventura.org/>.

If you have any questions about the information presented above, please contact Monica Hood, the case planner, at (805) 654-5038 or Monica.Hood@ventura.org.

Sincerely,

A handwritten signature in cursive script, reading "Brian R. Baca", is written over a horizontal line.

Brian R. Baca, Manager
Commercial and Industrial Permits Section
Ventura County Planning Division

Encl.: Final Conditions of Approval
MND Addendum
Approved Plans
Public Comments and Responses to Public Comments

c: Richard Naumann, 714 3rd Street, Woodland, CA 95695
Kimberly Rivers, CFROG, P.O. Box 114, Ojai, CA 93024
Case File

FINAL CONDITIONS OF APPROVAL

Renaissance Petroleum Oil and Gas Facility CUP No. PL14-0103

RESOURCE MANAGEMENT AGENCY CONDITIONS

Planning Division

1. Project Description

This permit authorizes the operation of an oil and gas facility. The approved project includes the following components:

- a) Installation, testing, operation, reworking, and maintenance of a total of five oil and gas wells (i.e. one existing well and four proposed wells). The existing oil and gas well is designated as Naumann No. 1 (API No. 11121431) with the coordinates (NAD83): 34.1603, -119.131007. The four proposed oil and gas wells and pumping units will be designated as Naumann No. 2, No. 3, No. 4, and No. 5, and will be located on the existing drilling pad. All of the drilling, completion, and production operations will be conducted in accordance to the rules and regulations of the California Department of Conservation, Division of Oil and Gas and Geothermal Resources ("DOGGR");
- b) The operation of equipment such as pumps, heaters, and refrigeration systems, and compressors for the separation of natural gas and produced water from crude oil, the separation of natural gas liquids from produced natural gas, and the processing of the natural gas to the specifications established by the Southern California Gas Company ("SCGC") for the introduction of the natural gas into the SCGC distribution pipeline system for sale to local customers;
- c) The operation of equipment such as pumps and compressors to support the on-site injection of produced water into a well or wells for disposal purposes or the on-site injection of natural gas into a well or wells for the purpose of reservoir pressure maintenance, or for the utilization of natural gas for gas lifting liquids from wells. (One well is currently authorized to be used for injection purposes.). Any injection activities shall only involve water or gas produced at the Naumann Drillsite or the Rosenmund Drillsite (another approved drillsite within the Cabrillo field which is discussed below);
- d) The transport of gas, natural gas liquids, crude oil, and produced water from the site (produced water may be transported to the Rosenmund Drillsite, or to a permitted commercial facility for disposal);

- e) The construction and operation of equipment and structures associated with the storage, processing, and transporting of oil, gas, natural gas liquids, and water, as shown on project plans;

An increase in the permitted number of truck trips associated with the transport of produced fluids from 4 one-way trips per day (2 truckloads) to 20 one-way trips per day (10 truckloads) to account for the anticipated increase in production. Truck transport of fluids will be limited to 4 one-way trips during peak traffic hours. The remaining 16 one-way trips will occur during non-peak hours;

- f) Extension of the hours of fluid transport (trucking) to 24 hours per day, 7 days per week from the currently authorized 7:30am to 6:30pm Monday through Saturday schedule.

A maximum of 3 truckloads of produced fluid shall be exported from the Naumann Lease site in any one hour.

All produced fluid tanker trucks associated with the proposed project shall exclusively use the segment of Etting Road located east of the Naumann Lease facility to connect to roads included in the County Regional Road Network. Project-related tanker trucks shall not travel on Dodge Road or the portion of Etting Road located west of the Naumann Lease facility site; and,

- g) Modifications of the ancillary equipment used at the facility as follows:
- i. Removal of two existing 500-barrel crude oil storage tanks;
 - ii. Removal of one existing 500-barrel produced water tank;
 - iii. Installation of two new 1,000-barrel crude oil storage tanks;
 - iv. Installation of one new 1,000-barrel produced water storage tank;
 - v. Relocation of one existing 500-barrel fire water storage tank;
 - vi. Relocation of one existing 20-foot tall light post; and,
 - vii. Relocation of one existing emergency gas flare.

Each of the three proposed new tanks is 21 feet in diameter and 16 feet in height.

The authorized Naumann Drillsite serves as the hub for operations of the Cabrillo Oil Field. The authorized oil and gas facility currently includes two gathering pipelines owned and operated by Renaissance Petroleum, LLC. The two gathering pipelines connect the Naumann Drillsite to the oil and gas facilities designated as Rosenmund Drillsite, authorized by CUP 5252. The Rosenmund Drillsite is located at 2797 East Pleasant Valley Road. Oil, gas and water produced at the Rosenmund Drillsite are conveyed by gathering pipelines to processing and storage facilities on the Naumann Drillsite in compliance with Section 8107-5.5.7 of the Ventura County Non-Coastal Zoning Ordinance. The gathering pipelines are regulated and administered by DOGGR.

No additional grading or expansion of the existing drilling pad is authorized. Hydraulic fracturing, acid well stimulation, and other "well stimulation treatments", as defined in Public Resources Code Section 3157, are not included in the proposed project. The use of any such well stimulation treatment as part of the project would require a subsequent discretionary modification of the CUP, additional environmental review under CEQA, and a public hearing.

This permit expires on April 13, 2047.

2. Hours of Well Maintenance

Purpose: In order to comply with § 8107-5.6.19 of the *Ventura County Non-Coastal Zoning Ordinance*.

Requirement: All nonemergency maintenance of a well shall be limited to the hours of 7:00 a.m. to 7:00 p.m. of the same day if the well site is located within 3,000 feet of an occupied residence. Nighttime well maintenance shall be permitted if it can be demonstrated to the satisfaction of the Planning Director that the applicable noise standards can be met or that all applicable and affected parties within the prescribed distance have signed a waiver pursuant to NCZO § 8107-5.6.25.

Documentation: If after-hour maintenance is proposed, the Permittee shall submit to the Planning Division for review and approval either signed waivers from all applicable parties located within the distance specified in § 8107-5.6.25 or a noise study that has been prepared by a qualified acoustical consultant that demonstrates that the applicable noise standard can be met.

Timing: The Permittee shall obtain Planning Division approval of any submitted noise study or submitted waivers prior to conducting after hours maintenance work. Unless approval of after-hour maintenance work is obtained, the regular hours of maintenance shall be observed for the effective period of this permit.

Monitoring and Reporting: The Planning Division maintains any submitted waivers in the project file. The Planning Division maintains any submitted noise study in the project file. The Planning Division has the authority to conduct periodic site inspections to ensure ongoing compliance with this condition pursuant to the requirements of § 8114-3 of the *Ventura County Non-Coastal Zoning Ordinance*.

3. Truck Trip Limitation and Hours

Purpose: In order to minimize the effects of the project on traffic circulation, tanker truck traffic shall be limited.

Requirement: Truck traffic associated with the transport of produced fluids from the project site shall not exceed 20 one-way trips per day. A maximum of 4 one-way truck trips are

authorized in the peak traffic periods from 7 a.m. to 9 a.m. and 4 p.m. to 6 p.m., Monday through Friday.

Documentation: The Permittee shall maintain a record of truck traffic arriving to and departing from the project site. The Permittee shall submit these records to the Planning Division upon request.

Timing: The Permittee shall maintain trucking records for the effective period of this permit.

Monitoring and Reporting: The Planning Division has the authority to conduct periodic site inspections or request trucking logs to ensure ongoing compliance with this condition pursuant to the requirements of the Ventura County Non-Coastal Zoning Ordinance § 8114-3.

4. Site Maintenance

Purpose: In order to comply with § 8107-5.6.10 of the *Ventura County Non-Coastal Zoning Ordinance* and to ensure that the CUP area is maintained in a neat and orderly manner.

Requirement: The Permittee shall maintain the project site in compliance with § 8107-5.6.10 of the *Ventura County Non-Coastal Zoning Ordinance*.

Documentation: See Monitoring and Reporting below.

Timing: The Permittee shall comply with this condition for the life of the permit.

Monitoring and Reporting: The County Building Inspector, Public Works Grading Inspector, Fire Marshall, and/or Planning Division staff has the authority to conduct periodic site inspections to ensure the Permittee's ongoing compliance with this condition consistent with the requirements of § 8114-3 of the *Ventura County Non-Coastal Zoning Ordinance*.

5. CUP Modification

Prior to undertaking any operational or construction-related activity which is not expressly described in these conditions or Project Description, the Permittee shall first contact the Planning Director to determine if the proposed activity requires a modification of this CUP. The Planning Director may, at the Planning Director's sole discretion, require the Permittee to file a written and/or mapped description of the proposed activity in order to determine if a CUP modification is required. If a CUP modification is required, the modification shall be subject to:

- a. The modification approval standards of the Ventura County Ordinance Code in effect at the time the modification application is acted on by the Planning Director; and,
- b. Environmental review, as required pursuant to the California Environmental Quality Act (CEQA; California Public Resources Code, §21000-21178) and the State CEQA

Guidelines (California Code of Regulations, Title 14, Chapter 3, § 15000-15387), as amended from time to time.

6. Construction Activities

Prior to installation of each new well and associated facilities (including pipelines), the Permittee shall obtain a Zoning Clearance for Construction from the Planning Division, and a Building Permit, if required, from the Building and Safety Division. Prior to any grading except as it relates to ground clearance requirements, the Permittee shall obtain a Grading Permit from the Public Works Agency.

7. Acceptance of Conditions and Schedule of Enforcement Responses

The Permittee's acceptance of this CUP and/or commencement of construction and/or operations under this CUP shall be deemed to be acceptance by the Permittee of all conditions of this CUP. Failure to abide by and comply with any condition for the granting of this CUP shall constitute grounds for enforcement action provided in Article 14 of the *Ventura County Non-Coastal Zoning Ordinance* which include, but are not limited to, the following actions:

- a. Public reporting of violations to the Planning Commission and/or Board of Supervisors;
- b. Suspension of the permitted land uses (Condition No. 1);
- c. Modification of the CUP conditions listed herein;
- d. Recordation of a "Notice of Noncompliance" on the subject property;
- e. The imposition of civil administrative penalties; and/or,
- f. Revocation of this CUP.

It is the Permittee's or the Permittee's successors-in-interest's responsibility to be aware of, and to comply with, the CUP conditions and the rules and regulations of all jurisdictions having authority over the uses described herein.

8. Time Limits

a. Use Inauguration:

- i. The granting of this CUP becomes effective upon the expiration of the 10-day appeal period following the decision, or when any appeals of the decision are finally resolved. Once the granting becomes effective, the Permittee must obtain a Zoning Clearance for Use Inauguration in order to initiate the land uses specified in Condition No. 1 (Project Description).
- ii. This CUP shall expire and become null and void if the Use Inauguration Zone Clearance has not been issued within one year of the date this CUP is granted [*Ventura County Non-Coastal Zoning Ordinance* (2010, 8111-4.7)]. The Planning Director may grant a one-year extension of time to

obtain the Use Inauguration Zoning Clearance if the Permittee can demonstrate to the satisfaction of the Planning Director that the Permittee has made a diligent effort to inaugurate the permitted land use, and the Permittee has requested the extension in writing prior to the one-year expiration date.

- iii. Prior to the issuance of the Use Inauguration Zoning Clearance, all fees and charges billed to that date by any County agency, as well as all fines, penalties, and sureties, must be paid or submitted in full. After issuance of the Use Inauguration Zoning Clearance, any final billed processing fees must be paid within 30 days of the billing date or this CUP is subject to revocation.
- iv. The oil and gas facility is subject to CUP LU05-0086 until CUP PL14-0103 (this permit) is use inaugurated or CUP LU05-0086 expires.

b. Permit Life or Operations Period:

This CUP will expire on April 13, 2047. The lack of additional notification of the expiration date provided by the County to the Permittee shall not constitute grounds to continue the uses that are authorized by this CUP after the CUP expiration date. The uses authorized by this CUP may continue after the CUP expiration date if:

- i. The Permittee has filed a permit modification application pursuant to Section 8111-6 of the *Ventura County Non-Coastal Zoning Ordinance* prior to April 13, 2047; and
- ii. The County decision-maker grants the requested modification.

The uses authorized by this CUP may continue during processing of a timely-filed modification application in accordance with Section 8111-2.10 of the *Ventura County Non-Coastal Zoning Ordinance*.

9. Documentation Verifying Compliance with Other Agencies' Requirements Related to this CUP

Purpose: To ensure compliance with and notification of federal, state, or local government regulatory agencies that have requirements that pertain to the project as the project is described in Condition No. 1 above and that is the subject of this CUP.

Requirement: The Permittee shall provide the Planning Division with documentation (e.g., copies of permits or agreements from other agencies, which are required pursuant to a condition of this CUP) to verify that the Permittee has obtained or satisfied all applicable federal, state, and local entitlements and conditions that pertain to the project. Documentation will include, but not be limited to, a Notice of Intent from DOGGR for each proposed new or re-drilled well.

Documentation: The Permittee shall provide this documentation to the County Planning Division in the form that is acceptable to the agency issuing the entitlement or clearance, to be included in the Planning Division project file.

Timing: The documentation shall be submitted to the Planning Division prior to the issuance of the Zoning Clearance or as required by the established procedures implemented by the other agency(s).

Monitoring and Reporting: The Planning Division maintains the documentation provided by the Permittee in the respective project file. In the event that the federal, state, or local government regulatory agency prepares new documentation due to changes in the project or the other agency's requirements, the Permittee shall submit the new documentation within 30 days of receipt of the documentation from the other agency.

10. Notice of CUP Requirements and Retention of CUP Conditions On the Site

Purpose: In order to notify landowners and others associated with the facility of permit requirements.

Requirement: Unless otherwise required by the Planning Director, the Permittee shall notify, in writing, the Property Owner(s) of record, contractors, and all other parties and vendors who regularly conduct activities associated with the Project, of the pertinent conditions of this CUP.

Documentation: The Permittee shall maintain a current set of CUP conditions and exhibits at the project site.

Timing: Prior to issuance of a Zoning Clearance for Use Inauguration and throughout the life of the Project.

Monitoring and Reporting: The Planning Division has the authority to conduct periodic site inspections to ensure ongoing compliance with this condition consistent with the requirements of § 8114-3 of the *Ventura County Non-Coastal Zoning Ordinance*.

11. Recorded Notice of Land Use Entitlement

Purpose: In order to comply with § 8111-8.3 of the *Ventura County Non-Coastal Zoning Ordinance*, a "Notice of Land Use Entitlement" form, furnished by the Planning Division, shall be recorded that references the real property that is the subject of this CUP and that describes the responsibilities of the Property Owner or Mineral Rights Lessee and Permittee for compliance with applicable permit conditions and regulations.

Requirement: The Mineral Rights Lessee shall sign, have notarized, and record with the Office of the County Recorder, a Notice of Land Use Entitlement form furnished by the

Planning Division, for the tax assessor's parcel number (APN) that is the subject of this CUP. That APN is 232-9-062-034.

Documentation: A copy of the Notice of Land Use Entitlement form shall be returned to the Planning Division by the Office of the County Recorder to be filed with, and made part of the case file.

Timing: The Notice of Land Use Entitlement shall be recorded prior to the issuance of a Zoning Clearance for Use Inauguration.

Monitoring and Reporting: The Planning Division shall maintain a copy of the "Notice of Land Use Entitlement" form in the project file.

12. Financial Responsibility for Compliance Monitoring and Enforcement

- a. **Cost Responsibilities:** The Permittee shall bear the full costs of all County staff time, materials, and County-retained consultants associated with condition compliance review and monitoring, CEQA mitigation monitoring, other permit monitoring programs, and enforcement activities, actions, and processes conducted pursuant to the Ventura County Non-Coastal Zoning Ordinance (§ 8114-3) related to this CUP. Such condition compliance review, monitoring and enforcement activities may include (but are not limited to): periodic site inspections; preparation, review, and approval of studies and reports; review of permit conditions and related records; enforcement hearings and processes; drafting and implementing compliance agreements; and attending to the modification, suspension, or revocation of permits. Costs will be billed at the rates set forth in the Planning Division or other applicable County Fee Schedule, and at the contract rates of County-retained consultants, in effect at the time the costs are incurred.

The Resource Management Agency created Condition Compliance Case No. CC13-0028 to cover the costs associated with condition compliance review, monitoring, and enforcement activities, and any duly-imposed civil administrative penalties. The Planning Division will continue to use Condition Compliance Case No. CC13-0028 to cover the costs associated with condition compliance review, monitoring, and enforcement activities described in subsection 12.a (above), and any duly-imposed civil administrative penalties regarding this CUP.

Within 10 calendar days of the effective date of the final decision approving this CUP, the Permittee shall submit a new, updated, and completed reimbursement agreement for Condition Compliance Case No. CC13-0028, in a form provided by the Planning Division, obligating the Permittee to pay all condition compliance review, monitoring, and enforcement costs, and any civil administrative penalties, subject to the Permittee's right to challenge all such charges and penalties prior to payment.

- b. **Billing Process:** The Permittee shall pay all Planning Division invoices within 30 days of receipt thereof. Failure to timely pay an invoice shall subject the Permittee to late fees

and charges set forth in the Planning Division Fee Schedule, and shall be grounds for suspension, modification, or revocation of this CUP. The Permittee shall have the right to challenge any charge or penalty prior to payment.

13. Defense and Indemnification

- a. The Permittee shall defend, at the Permittee's sole expense with legal counsel acceptable to the County, against any and all claims, actions, or proceedings against the County, any other public agency with a governing body consisting of the members of the County Board of Supervisors, or any of their respective board members, officials, employees and agents (collectively, "Indemnified Parties") arising out of or in any way related to the County's issuance, administration, or enforcement of this CUP. The County shall promptly notify the Permittee of any such claim, action or proceeding and shall cooperate fully in the defense.
- b. The Permittee shall also indemnify and hold harmless the Indemnified Parties from and against any and all losses, damages, awards, fines, expenses, penalties, judgments, settlements, or liabilities of whatever nature, including but not limited to court costs and attorney fees (collectively, "Liabilities"), arising out of or in any way related to any claim, action or proceeding subject to subpart (a) above, regardless of how a court apportions any such Liabilities as between the Permittee, the County, and/or third parties.
- c. Except with respect to claims, actions, proceedings, and Liabilities resulting from an Indemnified Party's sole active negligence or intentional misconduct, the Permittee shall also indemnify, defend (at Permittee's sole expense with legal counsel acceptable to County), and hold harmless the Indemnified Parties from and against any and all claims, actions, proceedings, and Liabilities arising out of, or in any way related to, the construction, maintenance, land use, or operations conducted pursuant to this CUP, regardless of how a court apportions any such Liabilities as between the Permittee, the County, and/or third parties. The County shall promptly notify the Permittee of any such claim, action, or proceeding and shall cooperate fully in the defense.
- d. Neither the issuance of this CUP, nor compliance with the conditions hereof, shall relieve the Permittee from any responsibility otherwise imposed by law for damage to persons or property; nor shall the issuance of this CUP serve to impose any liability upon the Indemnified Parties for injury or damage to persons or property.

14. Invalidation of Condition(s)

If any of the conditions or limitations of this CUP are held to be invalid, that holding shall not invalidate any of the remaining conditions or limitations set forth. In the event that any condition contained herein is determined to be in conflict with any other condition contained herein, then where principles of law do not provide to the contrary, the conditions most protective of public health and safety and natural environmental resources shall prevail to the extent feasible, as determined by the Planning Director.

In the event that any condition imposing a fee, exaction, dedication, or other mitigation measure is challenged by the project sponsors in an action filed in a court of law, or threatened to be filed therein, which action is brought in the time period provided for by the Code of Civil Procedures (§ 1094.6), or other applicable law, this CUP shall be allowed to continue in force until the expiration of the limitation period applicable to such action, or until final resolution of such action, provided the Permittee has, in the interim, fully complied with the fee, exaction, dedication, or other mitigation measure being challenged.

If any condition is invalidated by a court of law, and said invalidation would change the findings and/or the mitigation measures associated with the approval of this CUP, the project may be reviewed, at the discretion of the Planning Director, by the Planning Commission and substitute feasible conditions/mitigation measures may be imposed to adequately address the subject matter of the invalidated condition. The determination of adequacy shall be made by the Planning Commission. If the Planning Commission cannot identify substitute feasible conditions/mitigation measures to replace the invalidated condition, and cannot identify overriding considerations for the significant impacts that are not mitigated to a level of insignificance as a result of the invalidation of the condition, then this CUP may be revoked.

15. Consultant Review of Information and Consultant Work

The County and all other County permitting agencies for this land use have the option of referring any and all special studies that these conditions require to an independent and qualified consultant for review and evaluation of issues beyond the expertise or manpower of County staff.

Prior to the County engaging any independent consultants or contractors pursuant to the conditions of this CUP, the County shall confer in writing with the Permittee regarding the necessary work to be contracted, as well as the costs of such work. Whenever feasible, the lowest bidder will be used. Any decisions made by County staff may be appealed pursuant to the appeal procedures contained in the Ventura County Zoning Ordinance Code then in effect.

The Permittee may hire private consultants to conduct work required by the County, but only if the consultant and the consultant's proposed scope-of-work are first reviewed and approved by the County. The County retains the right to hire its own consultants to evaluate any work that the Permittee or a contractor of the Permittee undertakes. In accordance with Condition No. 12 above, if the County hires a consultant to review any work undertaken by the Permittee, or hires a consultant to review the work undertaken by a contractor of the Permittee, the hiring of the consultant will be at the Permittee's expense.

(Note: As of the CUP approval date, no consultants have been retained by the County and no special studies have been requested.)

16. Relationship of CUP Conditions, Laws and Other Permits

The design, maintenance, and operation of the CUP area and facilities thereon shall comply with all applicable requirements and enactments of Federal, State, and County authorities, as amended (e.g., County Business License Tax Ordinance), and all such requirements and enactments shall by reference become conditions of this CUP. In the event of conflicts between various requirements, the more restrictive requirements shall apply. In the event that any CUP condition contained herein is determined to be in conflict with any other CUP condition contained herein, then where principles of law do not provide to the contrary, the CUP condition most protective of public health and safety and environmental resources shall prevail to the extent feasible, as determined by the Planning Director.

No condition of this CUP for uses allowed by the Ventura County Ordinance Code shall be interpreted as permitting or requiring any violation of law, or any lawful rules or regulations or orders of an authorized governmental agency. Neither the issuance of this CUP nor compliance with the conditions of this CUP shall relieve the Permittee from any responsibility otherwise imposed by law for damage to persons or property.

A business tax certificate shall be obtained for the operation of an oil and gas production facility.

17. Contact Person

Purpose: In order to facilitate the resolution of complaints, a contact person that represents the Permittee shall be designated.

Requirement: The Permittee shall designate a contact person(s) to respond to complaints from citizens and the County which are related to the permitted uses of this CUP.

Documentation: The Permittee shall provide the Planning Director with the contact information (e.g., name and/or position title, address, business and cell phone numbers, and email addresses) of the Permittee's field agent who receives all orders, notices, and communications regarding matters of condition and code compliance at the CUP site.

Timing: Prior to the issuance of a Zoning Clearance for Use Inauguration, the Permittee shall provide the Planning Division the contact information of the Permittee's field agent(s) for the project file. If the address, fax, phone, number or e-mail address of the Permittee's agents should change, or the responsibility be assigned to another person or position, the permittee shall provide the Planning Director with the new information within three business days.

Monitoring and Reporting: The Planning Division maintains the contact information provided by the Permittee in the respective project file. The Planning Division has the authority to periodically confirm the contact information consistent with the requirements of § 8114-3 of the *Ventura County Non-Coastal Zoning Ordinance*.

18. Resolution of Complaints

The following process shall be used to resolve complaints related to the project:

- a. The Permittee shall post the telephone number for the designated Contact Person as identified pursuant to Condition No. 17 in a visible location on the site. The Contact Person shall be available via telephone on a 24-hour basis. Persons with concerns about an event as it is occurring may directly contact the Contact Person.
- b. If a written complaint about this project is received by the County, Planning staff will contact the Permittee's Contact Person or the Permittee to request information regarding the complaint.
- c. If, following a complaint investigation by County staff, a violation of Ventura County Code or a condition of this permit is confirmed, County enforcement actions pursuant to § 8114-3 of the *Non-Coastal Zoning Ordinance* may be initiated.

19. Reporting of Major Incidents or Accidents

Purpose: In order to comply with § 8107-5.6.8 of the *Ventura County Non-Coastal Zoning Ordinance* and to ensure that the Planning Director is notified of major incidents within the CUP area.

Requirement: The Permittee shall immediately notify the Planning Director and Fire Department and all other applicable agencies in the event of fires, spills, or hazardous conditions not incidental to the normal operations at the permit site.

Documentation: Upon request of any County agency, the Permittee shall provide a written report of any incident that shall include, but is not limited to: a description of the facts of the incident; the corrective measures used, if any; and, the steps taken to prevent a recurrence of the incident.

Timing: The Permittee shall provide the written report to the requesting County agency and Planning Division within seven days of the request.

Monitoring and Reporting: The Planning Division maintains any documentation provided by the Permittee related to major incidents in the CUP file.

20. Change of Permittee

Purpose: To ensure that the Planning Division is properly and promptly notified of any change of Permittee.

Requirement: The Permittee shall file, as a notice with the Planning Director, the new name(s), address(es), telephone/FAX number(s), and email addresses of the new owner(s),

lessee(s), operator(s) of the permitted uses, and the company officer(s). The Permittee shall provide the Planning Director with the notice once the transfer of ownership and/or operational control has occurred.

Documentation: The notice must be submitted with the new Permittee's contact information. The notice of transfer must include the effective date and time of the transfer and a letter signed by the new Property Owner(s), lessee(s), and/or operator(s) of the permitted uses acknowledging and agreeing to comply with all conditions of this CUP.

Timing: The Permittee shall provide written notice to the Planning Director 5 days after the change of ownership or change of Permittee.

Monitoring and Reporting: The Planning Division maintains notices submitted by the Permittee in the Project file and has the authority to periodically confirm the information consistent with the requirements of § 8114-3 of the *Ventura County Non-Coastal Zoning Ordinance*.

21. Paleontological Resources Inadvertently Discovered During Ground Disturbance

Purpose: In order to mitigate potential impacts on paleontological resources that may be encountered during ground disturbance or construction activities.

Requirement: If any paleontological remains, as defined in the County of Ventura Initial Study Assessment Guidelines (ISAGs), are uncovered during ground disturbance or construction activities, the Permittee shall:

- I. Cease operations and assure the preservation of the area in which the discovery was made;
- II. Notify the Planning Director in writing, within three days of the discovery;
- III. Obtain the services of a paleontological consultant or professional geologist who shall assess the find and provide recommendations on the proper disposition of the site;
- IV. Obtain the Planning Director's written concurrence of the recommended disposition of the site before resuming development; and,
- V. Implement the agreed upon recommendations.

Documentation: If any paleontological resources are inadvertently encountered during ground disturbance the Permittee shall submit a report prepared by a County-approved paleontologist or geologist that includes recommendations for the proper disposition of the find.

Timing: The Permittee shall comply with this condition for the life of the permit. Paleontological reports shall be provided to the Planning Division immediately upon completion.

Monitoring and Reporting: The Permittee shall provide any paleontological report prepared for the project site to the Planning Division to be made part of the project file. The Permittee shall implement any recommendations made in the paleontological report to the satisfaction of the Planning Director.

22. Archaeological Resources Inadvertently Discovered During Ground Disturbance

Purpose: In order to mitigate potential impacts to archaeological resources inadvertently discovered during ground disturbance.

Requirement: The Permittee shall implement the following procedures:

- I. If any archaeological or historical artifacts are uncovered during ground disturbance or construction activities, the Permittee shall:
 - i. Cease operations and assure the preservation of the area in which the discovery was made;
 - ii. Notify the Planning Director in writing, within three days of the discovery;
 - iii. Obtain the services of a County-approved archaeologist who shall assess the find and provide recommendations on the proper disposition of the site in a written report format;
 - iv. Obtain the Planning Director's written concurrence of the recommended disposition of the site before resuming development; and,
 - v. Implement the agreed upon recommendations.
- II. If any human burial remains are encountered during ground disturbance or construction activities, the Permittee shall:
 - i. Cease operations and assure the preservation of the area in which the discovery was made;
 - ii. Immediately notify the County Coroner and the Planning Director;
 - iii. Obtain the services of a County-approved archaeologist and, if necessary, Native American Monitor(s), who shall assess the find and provide recommendations on the proper disposition of the site in a written report format;
 - iv. Obtain the Planning Director's written concurrence of the recommended disposition of the site before resuming development on-site; and,
 - v. Implement the agreed upon recommendations.

Documentation: If any archaeological, historical artifacts, or human burial remains are inadvertently encountered during ground disturbance, the Permittee shall submit a report prepared by a County-approved archaeologist that includes recommendations for the proper disposition of the site. Additional documentation may be required to demonstrate that the Permittee has implemented any recommendations made by the archaeologist's report.

Timing: The Permittee shall comply with this condition for the life of the permit. Archaeologist reports shall be provided to the Planning Division immediately upon completion.

Monitoring and Reporting: The Permittee shall provide any archaeologist report prepared for the project site to the Planning to be made a part of the project file. The Permittee shall implement any recommendations made in the archaeologist's report to the satisfaction of the Planning Director.

23. Financial Security

Purpose: In order to comply with § 8107-5.6.5 of the *Ventura County Non-Coastal Zoning Ordinance* and to ensure the conditions of this permit are fulfilled.

Requirement: The Permittee shall file, in a form acceptable to Operations Division of the Resource Management Agency, a bond or other security in the penal amount of not less than \$10,000.00 for each well that is drilled or to be drilled. In lieu of filing such a security for each well the Permittee may file a security in the penal amount of not less than \$10,000.00 to cover all operations conducted in the County of Ventura, conditioned upon the Permittee well and truly obeying, fulfilling and performing each and every term and provision of the permit. By accepting this Conditional Use Permit and providing the financial security for its operation, the Permittee is agreeing to cure any condition noncompliance issue that may be discovered during County compliance review. Forfeiture of the financial security may occur if the noncompliance issue is not resolved in a manner that is acceptable to the Planning Director.

Documentation: A receipt or memorandum from the Operations Division shall serve as evidence that the security has been submitted and accepted.

Timing: The Permittee shall provide evidence to the Planning Division that the security has been accepted by the Operations Division prior to commencing or continuing drilling or other uses associated with this permit. As of September 15, 2016, the Permittee is in compliance with this Condition of Approval.

Monitoring and Reporting: The Planning Division maintains evidence of the financial security submittal in the project file. In cases of any failure by the Permittee to perform or comply with any term or provision of the permit, the Planning Commission may, after notice to the Permittee and a public hearing, by resolution, determine the amount of the penalty and declare all or part of the security forfeited in accordance with its provisions. The sureties and principal will be jointly and severally obligated to pay forthwith the full amount of the forfeiture to the County of Ventura. The forfeiture of any security shall not insulate the Permittee from liability in excess of the sum of the security for damages or injury, or for expense or liability suffered by the County of Ventura from any breach by the Permittee of any term or condition of said permit or of any applicable ordinance or of this security. The Planning Division shall not exonerate the security until the Permittee has satisfied all of the applicable conditions of this Conditional Use Permit.

24. Removal of Drilling Equipment

Purpose: In order to comply with § 8107-5.6.3 of the *Ventura County Non-Coastal Zoning Ordinance* and to ensure the removal of drilling equipment.

Requirement: All equipment used for drilling, re-drilling, and maintenance work on approved wells shall be removed from the site within 30 days of the completion of such work unless a time extension is approved by the Planning Director.

Documentation: The Permittee shall submit photo-documentation that the equipment has been removed by the applicable deadline.

Timing: The Permittee shall remove the equipment within 30 days of the completion of such work unless the Permittee obtains the Planning Director's written approval of an alternate deadline.

Monitoring and Reporting: The Planning Division has the authority to conduct periodic site inspections to ensure ongoing compliance with this condition pursuant to the requirements of § 8114-3 of the *Ventura County Non-Coastal Zoning Ordinance*.

25. Waste Handling and Containment of Contaminants

Purpose: In order to comply with § 8107-5.6.4 of the *Ventura County Non-Coastal Zoning Ordinance* and to ensure waste materials and other pollutants are handled appropriately according to federal, state and local laws and regulations.

Requirement:

The Permittee shall:

- a. furnish the Planning Division with a containment plan for the on-site containment of oil, produced water, drilling fluids, cuttings and other contaminants associated with the drilling, production, storage and transport of oil;
- b. prevent saline or other polluting or contaminating substances from reaching surface or subsurface waters;
- c. provide the Planning Division with a plan for controlling oil spillage;
- d. ensure that the plans for containment of contaminating substances and oil spillage shall be consistent with requirements of County, State and Federal laws; and,
- e. secure all appropriate permits, permit modifications or approvals when necessary, prior to treatment or re-use of oil field waste materials.

Documentation: The Permittee shall prepare and provide the Planning Division a containment plan to demonstrate compliance with condition 25.a in accordance with § 8107-5.6.4. An AB 1960 plan or a Spill Prevention, Control, and Countermeasure (SPCC) Plan approved by DOGGR can be used to satisfy this requirement.

Timing: The Permittee shall submit the containment plan (25.a) to the Planning Division prior to issuance of the Zoning Clearance for Use Inauguration.

Monitoring and Reporting: The Planning Division maintains the containment plan provided by the Permittee in the project file. The Planning Division has the authority to conduct periodic site inspections to ensure ongoing compliance with this condition pursuant to the requirements of § 8114-3 of the *Ventura County Non-Coastal Zoning Ordinance*.

26. Dust Prevention and Road Maintenance

Purpose: In order to comply with § 8107-5.6.6 of the *Ventura County Non-Coastal Zoning Ordinance* regarding dust prevention and road maintenance.

Requirement: If requested by the Planning Director, the Permittee shall prepare a dust control plan. The drill site and all roads or hauling routes located between the public right-of-way and the subject site shall be improved or otherwise treated as required by the County and maintained as necessary to prevent the emanation of dust. Access roads shall be designed and maintained so as to minimize erosion, prevent the deterioration of vegetation and crops, and ensure adequate levels of safety.

Documentation: The Permittee shall prepare a dust control plan if requested by the Planning Director.

Timing: The Permittee shall comply with Dust Prevention and Road Maintenance standards for the life of the permit. The Permittee shall provide the Planning Division a dust control plan if such a plan is requested by the Planning Director.

Monitoring and Reporting: The Planning Division has the authority to conduct periodic site inspections to ensure ongoing compliance with this condition consistent with the requirements of § 8114-3 of the *Ventura County Non-Coastal Zoning Ordinance*.

27. Light Emanation

Purpose: In order to comply with § 8107-5.6.7 of the *Ventura County Non-Coastal Zoning Ordinance* to ensure that light emanation:

- I. shall be controlled so as not to produce excessive levels of glare or abnormal light levels directed at any neighboring uses;

II. shall be kept to a minimum to maintain the normal night-time light levels in the area; and,

III. does not inhibit adequate and safe working light levels.

Requirement: If the installation of new and permanent light sources are proposed, or the relocation of existing light sources is proposed, the location of all flood lights and an outline of the illuminated area shall be shown on a landscape plan, if required, or on the site plan.

Documentation: The Permittee shall submit the landscape or site plan showing the lighting to the Planning Division for review and approval.

Timing: The Permittee shall obtain approval of the plan from the Planning Division prior to installation and use of new and permanent lighting fixtures. The lighting on the project site shall remain in conformance with the applicable approved plan for the effective period of this permit.

Monitoring and Reporting: The Planning Division has the authority to conduct periodic site inspections to ensure ongoing compliance with this condition pursuant to the requirements of § 8114-3 of the *Ventura County Non-Coastal Zoning Ordinance*.

28. Painting of Permanent Facilities, Structures and Pipelines

Purpose: In order to ensure that the painting of permanent facilities, structures and above ground pipelines comply with the Oil Development Standards of § 8107-5.6.9 of the *Ventura County Non-Coastal Zoning Ordinance*.

Requirement: The Permittee shall ensure that:

- a. all permanent facilities, structures, and aboveground pipelines on the site shall be colored so as to mask the facilities from the surrounding environment and uses in the area;
- b. said colors shall also take into account such additional factors as heat buildup and designation of danger areas; and,
- c. said colors shall be approved by the Planning Director prior to painting of facilities.

Documentation: Prior to the issuance of a Zoning Clearance for Construction of new structures, the Permittee shall provide the Planning Division with the painting details for the proposed new structures. On request, the Permittee shall provide photo evidence that the equipment is installed according to the approved plans.

Timing: Prior to the issuance of a Zoning Clearance for Construction of new structures, the Permittee shall provide the Planning Division with the painting details for the proposed new structures. The structures shall remain painted as approved for the life of the permit.

Monitoring and Reporting: The Planning Division maintains a copy of the approved plans in the project file. If photo evidence is requested of the Permittee, the Planning Division maintains the photo evidence provided by the Permittee demonstrating compliance with this condition in the project file. The Planning Division has the authority to conduct periodic site inspections to ensure ongoing compliance with this condition pursuant to the requirements of § 8114-3 of the *Ventura County Non-Coastal Zoning Ordinance*.

29. Site Restoration

Purpose: In order to comply with § 8107-5.6.11 of the *Ventura County Non-Coastal Zoning Ordinance*.

Requirement: Within 90 days of revocation, expiration or surrender of any permit, or abandonment of the use, the Permittee shall restore and revegetate the premises to as nearly its original condition as is practicable, unless otherwise requested by the landowner and approved by the Planning Director.

Documentation: The Permittee will submit a site restoration plan to the Planning Division for review and approval.

Timing: The Permittee shall submit the restoration plan to the Planning Division within 30 days of revocation, expiration, or surrender of the permit, or abandonment of the use. The Permittee shall commence restoration work on the site within 90 days of revocation, expiration, or surrender of the permit, or abandonment of the use.

Monitoring and Reporting: The Planning Division has the authority to conduct site inspections to ensure compliance with this condition pursuant to the requirements of § 8114-3 of the *Ventura County Non-Coastal Zoning Ordinance*. The Planning Division will not exonerate the financial securities required by Condition No. 23 (Financial Security) until it has determined that the site has been restored in accordance with § 8107-5.6.11.

30. Insurance

Purpose: In order to comply with § 8107-5.6.12 of the *Ventura County Non-Coastal Zoning Ordinance*.

Requirement: The Permittee shall maintain liability insurance of not less than \$500,000 for one person, and \$1,000,000 for all persons, and \$2,000,000 for property damage. The Permittee shall name the County of Ventura as an Additional Insured. This requirement does not preclude the Permittee from being self-insured.

Documentation: The Permittee shall submit a copy of a Certificate of Liability Insurance to the Planning Division for review and approval.

Timing: Prior to the issuance of a Zoning Clearance for Use Inauguration, the Permittee shall obtain approval of the liability insurance documents from the Planning Division. The Permittee shall maintain liability issuance for the subject property for the life of the permit.

Monitoring and Reporting: The Planning Division maintains a copy of the Certificate of Liability Insurance in the project file. The Planning Director may ask for a current Certificate of Liability Insurance at any time to confirm ongoing compliance with this condition.

31. Noise Standard for Oil and Gas Operations

Purpose: In order to comply with § 8107-5.6.13, § 8107-5.6.14, and § 8107-5.6.15 of the *Ventura County Non-Coastal Zoning Ordinance*.

Requirement: Per Sec. 8107-5.6.13, the Permittee shall ensure, unless an exception is applicable per Sec. 8107-5.6.14, that drilling, production, and maintenance operations associated with this permit do not exceed the following noise level averages, as measured over a one-hour period at locations of occupied sensitive uses (e.g., residences, schools, health care facilities, or places of public assembly):

One Hour Average Noise Levels (LEQ)		
Time Period	Drilling and Maintenance Phase	Producing Phase
Day (6:00 a.m. to 7:00 p.m.)	55 dB(A)	45 dB(A)
Evening (7:00 p.m. to 10:00 p.m.)	50 dB(A)	40 dB(A)
Night (10:00 p.m. to 6:00 a.m.)	45 dB(A)	40 dB(A)

For the purposes of this condition, a well is in the "producing phase" when hydrocarbons are being extracted or when the well is idle and not undergoing maintenance. It is presumed that a well is in the "drilling and maintenance phase" when it is not in the "producing phase."

Per Sec. 8107-5.6.14, the noise standard established pursuant to Sec. 8107-5.6.13 shall not be exceeded unless covered under any of the following provisions:

- a. Where the ambient noise levels (excluding the subject facility) exceed the applicable noise standards. In such cases, the maximum allowable noise levels shall not exceed the ambient noise levels plus 3 dB(A).
- b. Where the owners/occupants of sensitive uses have signed a waiver pursuant to Sec. 8107-5.6.25 indicating that they are aware that drilling and production operations could exceed the allowable noise standard and that they are willing to

experience such noise levels. The applicable noise levels shall apply at all locations where the owners/occupants did not sign such a waiver.

Per Sec. 8107-5.6.15, when the Permittee has been notified by the Planning Division that the Permittee is operating in violation of the applicable noise standard, the Permittee shall correct the problem as soon as possible in coordination with the Planning Division. In the interim, operations may continue; however, the operator shall attempt to minimize the total noise generated at the site by limiting, whenever possible, such activities as the following:

- I. hammering on pipe;
- II. racking or making-up of pipe;
- III. acceleration and deceleration of engines or motors;
- IV. drilling assembly rotational speeds that cause more noise than necessary and could reasonably be reduced by use of a slower rotational speed; and,
- V. picking up or laying down drill pipe, casing, tubing or rods into or out of the drill hole.

If the noise problem has not been corrected by 7:00 p.m. of the following day, the offending operations, except for those deemed necessary for safety reasons by the Planning Director upon the advice of the Division of Oil and Gas and Geothermal Resources, shall be suspended until the problem is corrected.

Upon the request of the Planning Director, the Permittee shall have a qualified acoustical consultant measure the offending noise, in accordance with the procedures in *Ventura County General Plan Hazards Appendix*. These measurements shall occur within 24 hours of the Planning Director's request.

This condition applies for the life of the permit. A report from a qualified acoustical consultant shall be submitted to the Planning Division upon request. If corrective measures are required to attenuate the offending noise to acceptable levels, the Permittee shall submit written and/or photo evidence to demonstrate that the corrective measures are in place prior to restarting the offending operations.

Documentation: If requested by the County, the Permittee shall prepare a noise report from a qualified acoustical consultant and provide it to the County for review and approval prior to any construction activity that causes noise.

Timing: If a qualified acoustical consultant is hired by the Permittee to investigate an alleged violation, the acoustical consultant shall submit their findings, by telephone, to the Planning Division immediately upon completing their measurements. Within 24 hours of completing the measurements, the acoustical consultant shall submit a written report to the Planning Division.

Monitoring and Reporting: The Planning Division has the authority to conduct periodic site inspections to ensure ongoing compliance with this condition pursuant to the requirements

of § 8114-3 of the *Ventura County Non-Coastal Zoning Ordinance*. The Planning Division maintains all acoustical reports, and a written description of any corrective measures, provided by the Permittee in the project file.

32. Preventive Noise Insulation and Soundproofing Material

Purpose: In order to comply with § 8107-5.6.16, § 8107-5.6.17, and § 8107-5.6.18 of the *Ventura County Non-Coastal Zoning Ordinance*.

Requirement: In accordance with § 8107-5.6.16, if drilling, redrilling, or maintenance operations, such as pulling pipe or pumps, are located within 1,600 feet of an occupied sensitive use, the work platform, engine base and draw works, crown block, power sources, pipe rack and other probable noise sources associated with a drilling or maintenance operation shall be enclosed with soundproofing sufficient to ensure that expected noise levels do not exceed the noise limits applicable to the permit. Such soundproofing shall be installed prior to the commencement of drilling or maintenance activities, and shall include any or all of the following: acoustical blanket coverings, soundwalls, or other soundproofing materials or methods which ensure that operations meet the applicable noise standard.

In accordance with § 8107-5.6.17, the Permittee may have a noise study prepared by a qualified acoustical consultant, approved by the County. If the findings of the study conclude that the proposed project will meet the County noise standard contained in Section 8107-5.6.13 and do not constitute a nuisance, then the soundproofing requirement may be waived. If the findings show that a noise level will be generated above and beyond the County noise standard, then soundproofing must be installed sufficient to meet the applicable County noise standard. Where a waiver pursuant to Sec. 8107-5.6.25 is signed, no preventive noise insulation will be required.

In accordance with § 8107-5.6.18, all acoustical blankets or panels used for required soundproofing shall be of fireproof materials and shall comply with California Industrial Safety Standards and shall be approved by the Ventura County Fire Protection District prior to installation.

Documentation: If drilling, redrilling, or well maintenance operations are located within 1,600 feet of an occupied sensitive use, the Permittee shall provide the Planning Division with evidence that soundproofing will be installed on the related drilling, redrilling and maintenance equipment or provide the Planning Division with waivers from all occupied sensitive uses located within 1,600 feet of the proposed drilling, redrilling or maintenance location in accordance with Sec. 8107-5.6.17 and pursuant to Sec. 8107-5.6.25.

Timing: At the time of issuance of a Zoning Clearance for drilling, redrilling, or maintenance, the Permittee shall provide the Planning Division with a drilling, redrilling, or maintenance program that includes the installation of Preventative Noise Insulation and Soundproofing Material approved by the Ventura County Fire Protection District; or, the Permittee shall provide the appropriate signed waivers pursuant to Sec. 8107-5.6.25.

Monitoring and Reporting: The Planning Division has the authority to conduct periodic site inspections to ensure ongoing compliance with this condition pursuant to the requirements of § 8114-3 of the *Ventura County Non-Coastal Zoning Ordinance*.

33. Limited Drilling Hours

Purpose: In order to comply with § 8107-5.6.20 of the *Ventura County Non-Coastal Zoning Ordinance*.

Requirement: All drilling activities shall be limited to the hours of 7:00 a.m. through 7:00 p.m. of the same day when they occur less than 800 feet from an occupied sensitive use. Nighttime drilling shall be permitted if it can be demonstrated to the satisfaction of the Planning Director that the applicable noise standards can be met or that all applicable parties within the prescribed distance have signed a waiver pursuant to § 8107-5.6.25.

Documentation: If nighttime drilling is proposed and the location is located less than 800 feet from an occupied sensitive use, the Permittee shall submit waivers pursuant to § 8107-5.6.25; or, demonstrate to the satisfaction of the Planning Director that the applicable noise standard can be met.

Timing: At the time of issuance of a Zoning Clearance for drilling activities the Permittee shall provide the Planning Division with waivers pursuant to § 8107-5.6.25; or, in lieu of the waivers, a noise study from a qualified acoustical consultant for review and approval by the Planning Division that demonstrates to the satisfaction of the Planning Director that the applicable noise standard can be met for nighttime drilling.

Monitoring and Reporting: The Planning Division maintains any submitted waivers in the project file. The Planning Division maintains any submitted noise study in the project file. The Planning Division has the authority to conduct periodic site inspections to ensure ongoing compliance with this condition pursuant to the requirements of § 8114-3 of the *Ventura County Non-Coastal Zoning Ordinance*.

34. Signs

Purpose: In order to comply with § 8107-5.6.21 of the *Ventura County Non-Coastal Zoning Ordinance*.

Requirement: In addition to the signage otherwise allowed by the *Ventura County Non-Coastal Zoning Ordinance* (§ 8110-0 et seq.), the Permittee shall only place within the permit area, signs that are required for directions, instructions, and warnings, identification of wells and facilities, or signs required by other County ordinances or State and federal laws. Identification signs shall not exceed four square feet in size and shall contain, at a minimum, the following information:

- I. the Division of Oil and Gas well name and number;
- II. the name of the owner/operator of the oil facility;
- III. the name of the lease and name and/or number of the well; and,
- IV. the name and telephone number of person(s) on 24-hour emergency call.

The Permittee shall maintain the well identification sign(s) at the well site from the time drilling operations commence until the well is abandoned.

Documentation: Well and operator identification are stipulated in the California Code of Regulations, Title 14, Division 2, Chapter 4, Section 1722.1.1 DOGGR. DOGGR is the regulating authority. DOGGR documents compliance with State law during inspection of the facility and well location. The Permittee shall indicate the location and specification of signs in the application(s) submitted for Zoning Clearances for new wells.

Timing: In accordance with § 8107-5.6.21, the Permittee shall place sign(s) at the drillsite prior to the commencement of drilling operations. The signs are to remain until the well is abandoned.

Monitoring and Reporting: The Planning Division has the authority to conduct periodic site inspections to ensure ongoing compliance with this condition pursuant to the requirements of § 8114-3 of the *Ventura County Non-Coastal Zoning Ordinance*.

35. Fencing

Purpose: In order to comply with § 8107-5.6.22 of the *Ventura County Non-Coastal Zoning Ordinance*.

Requirement: The Permittee shall securely fence all active well sites (except submersible pumps), sumps and drainage basins or any machinery in use or intended to be used at the well site or other associated facilities, if required, based on the Planning Director's determination that fencing is necessary due to the proximity of nearby businesses, residences, or other occupied sensitive uses. The Permittee may use a single, adequate fence, which is compatible with the surrounding area, in order to enclose the wells or well site and appurtenances. Well fencing is required under the California Code of Regulations, Title 14, Division 2, Chapter 4, Sections 1777 and 1778 of the California Code of Regulations which is administered by the California Division of Oil and Gas and Geothermal Resources (DOGGR). The fences must meet all Division of Oil and Gas regulations.

Documentation: Well safety, facility safety, and enclosure specifications are stipulated in the California Code of Regulations, Title 14, Division 2, Chapter 4, Sections 1777 and 1778 of the California Code of Regulations which is administered by DOGGR. DOGGR is the regulating authority. DOGGR documents compliance with State law during inspection of the facility and well location. The Permittee shall indicate the location and specification of

fencing on the site plan that is submitted in support of the issuance of a Zoning Clearance for a new well.

Timing: The Permittee shall provide the Planning Division with a site plan that includes fencing details and specifications prior to the issuance of a Zoning Clearance for a new well.

Monitoring and Reporting: The Planning Division maintains the approved site plan and fencing details in the project file. The Planning Division has the authority to conduct periodic site inspections to ensure ongoing compliance with this condition pursuant to the requirements of § 8114-3 of the *Ventura County Non-Coastal Zoning Ordinance*.

36. Ancillary Pipelines

Purpose: To document the location of new ancillary pipelines and other facilities associated with each new well, a detailed site plan will be required.

Requirement: The Permittee shall provide a detailed site plan of new ancillary pipelines and other facilities associated with each new well for inclusion in the Zoning Clearance for Construction of each new well. For purposes of the condition, ancillary pipelines are pipelines and flowlines connecting a well to tanks or production facilities.

Documentation: The permittee shall submit to the Planning Division for review and approval, a site plan drawn to scale depicting the exact location of each new well and all associated ancillary pipelines and other facilities.

Timing: The Permittee shall obtain Planning Division approval of the submitted site plan, prior to the issuance of a Zoning Clearance for Construction of each new well.

Monitoring and Reporting: A copy of the approved site plan will be included in the Zoning Clearance for Construction and shall be kept on file with the Planning Division. The Planning Division staff has the authority to conduct periodic site inspections to ensure the Permittee's compliance with this condition.

Environmental Health Division

37. Hazardous Materials Management

The storage, handling, and disposal of any potentially hazardous material must be in compliance with applicable state regulations.

Public Works Agency Conditions

Transportation Division

38. Traffic Impact Mitigation Fee

Purpose: To address the cumulative adverse impacts of traffic on the Regional Road Network, TIMF Ordinance 4246 and County General Plan (GP) 4.2.2 require that the PWA Transportation Department collect a TIMF.

Requirement: The applicant/permittee shall deposit with the PWA Transportation Department a TIMF. The trip generation rate and TIMF will be calculated based on the applicant's information. The applicant/permittee may choose to submit additional information or provide a Traffic Study to supplement the information currently provided to establish the trip generation rate. The TIMF may be adjusted for inflation at the time of deposit in accordance with the latest version of the Engineering News Record Construction Cost Index. Based on the applicant's information, the additional trip generation from the new wells is 16 ADT. The TIMF due to the County would be:

$$\$1,061.28 = 16 \text{ ADT} \times \$66.33 / \text{ADT}^*$$

Notes

1. * The project is in the Oxnard Traffic District #8.
2. The traffic generated by the project/development is below the threshold for the City of Oxnard, therefore the TIMF will not be collected.
3. The trips generated by the project/development shall be used as a baseline level so that the TIMF may be computed for future increases in the trip generation. Based on the applicant's information, the baseline level will be 20 average daily trips.

Documentation: The applicant/permittee shall come to the PWA Transportation Department counter, fill out the TIMF form, and pay the TIMF and will provide the Planning Division with a receipt for payment of the TIMF.

Timing: This condition shall be met prior to the issuance of the Zoning Clearance for a Use Inauguration.

Monitoring and Reporting: The PWA Transportation Department will review and approve the payment of the TIMF.

39. Encroachment Permit

Purpose: An Encroachment Permit is required for any work conducted within the County right of way.

Requirement: The applicant/permittee shall contact the Encroachments Division at 805-654-2055 for requirements of the permit.

Documentation: The application shall be submitted to the PWA Transportation Department.

Timing: This condition shall be met prior to the issuance of a Zoning Clearance for any work conducted within the County right of way.

Monitoring and Reporting: The PWA Transportation Department will review the application and supporting documentation. The PWA Transportation Department Inspectors will monitor construction and verify that the work is performed in accordance with the Encroachment Permit.

Engineering Services Department

40. Grading Permit

Purpose: In order to ensure the Permittee performs all grading in compliance with Appendix J of the Ventura County Building Code.

Requirement: The Permittee shall submit a grading plan showing existing and proposed elevations to the Public Works Agency's Development and Inspection Services Division for review and approval prior to conducting any grading. If a grading permit is required, a State licensed civil engineer must prepare and submit the grading plans to Development and Inspection Services Division for review and approval.

Documentation: If a grading permit is required, all materials, as detailed on Public Works Agency Form DS 37 and/or DS 44, must be submitted to Development and Inspection Services Division for review and approval.

Timing: All applicable documentation, as specified above, must be approved prior to the issuance of a Building Permit for which the grading was performed.

Monitoring and Reporting: Public Works Agency engineers will review grading plans and reports for compliance with Ventura County codes, ordinances and standards, as well as state and federal laws. Public Works Agency inspectors will monitor the proposed grading to verify that the work is done in compliance with the approved plans and reports.

41. Drainage Plan

Purpose: To ensure runoff is discharged in accordance with Ventura County Building Code, Ventura County Public Works Agency, Watershed Protection District, national and State standards.

Requirement: The Permittee shall submit drainage plans and hydrologic and hydraulic calculations, which are prepared by a registered civil engineer, to the Public Works Agency's Development and Inspection Services Division for review and approval. The Permittee shall post sufficient surety in order to ensure proper completion of the drainage plan.

Documentation: Drainage plans and hydrologic and hydraulic calculations shall address the following: quantities of water, water flow rates, major water courses, drainage areas and patterns, diversions, collection systems, flood hazard areas, sumps, debris basins, detention

facilities, and drainage courses and mitigation measures devised to manage the drainage. The hydrologic and hydraulic calculations shall be in compliance with the Ventura County Watershed Protection District's hydrology and design manuals. The hydrologic and hydraulic calculations shall include evidence that all the buildable sites in the proposed project will be protected from flooding based on a 1% annual chance storm.

Timing: All documentation, as specified above, must be approved by Public Works Agency prior to issuance of a grading permit should new grading occur.

Monitoring and Reporting: Public Works Agency engineers will review drainage plans and hydrologic and hydraulic calculations for compliance with state and federal laws, as well as Ventura County codes, ordinances and standards. Public Works Agency inspectors will monitor the construction to verify that the work is done in compliance with the approved plans and reports.

42. Land Development Fee for Flood Control Facilities (AKA: Flood Acreage Fee (FAF))

Purpose: To address the cumulative adverse impacts of runoff from development on Watershed Protection District Facilities as required by Ordinance No. FC 24.

Requirement: The Permittee shall deposit with the PWA – Engineering Services Department a Flood Acreage Fee (FAF) in accordance with Ordinance No FC 24 and subsequent resolutions. The fee will be calculated based on the Permittee's information. The Permittee may choose to submit additional information to supplement the information currently provided to establish the amount of the fee.

Documentation: The Permittee shall provide a site plan including a calculation of the new impervious surface being created by the project along with impervious surface for existing construction.

Timing: Permittee shall pay the Flood Acreage Fee (FAF) to the Ventura County Public Works Agency prior to obtaining zoning clearance for the first new well.

Monitoring and Reporting: Public Works Agency staff will prepare a quote of the fee amount and provide a receipt when the fee is paid.

Water Quality Section

43. Compliance with Stormwater Development Construction Program

Purpose: To ensure compliance with the Los Angeles Regional Water Quality Control Board NPDES Municipal Stormwater Permit No. CAS004002 (Permit) the proposed project will be subject to the construction requirements for surface water quality and storm water runoff in accordance with Part 4.F., "Development Construction Program" of the Permit.

Requirement: The construction of the proposed project shall meet requirements contained in Part 4.F. "Development Construction Program" of the Permit through the inclusion of effective implementation of the Construction BMPs during all ground disturbing activities.

Documentation: The Permittee shall submit to the Watershed Protection District, Surface Water Quality Section (SWQS) for review and approval:

- Complete SW-1 form (Best Management Practices for Construction Less Than One Acre) which can be found at <http://onestoppermit.ventura.org/>.

Timing: The above listed item shall be submitted to the SWQS for review and approval prior to issuance of a Zoning Clearance for the first new well.

Monitoring and Reporting: SWQS will review the submitted materials for consistency with the NPDES Municipal Stormwater Permit. Building Permit Inspectors will conduct inspections during construction to ensure effective installation of the required BMPs.

Other Ventura County Agencies Conditions

Ventura County Fire Protection District

44. Access Road Widths, Commercial or Industrial

Purpose: To ensure that adequate fire department access is provided in conformance with current California State Law and Ventura County Fire Protection District Ordinance.

Requirement: The Permittee shall provide a minimum all weather access road width of 20 feet. Parking or placement of materials/equipment is prohibited within the required 20 foot road width. Access roads shall be constructed to support a 20,000 pound fire truck in all weather conditions. Access roads shall be certified by a registered civil engineer.

Documentation: The Permittee shall submit an access plan to the Fire Prevention Bureau for review and approval.

Timing: Prior to the issuance of the Zoning Clearance for Use Inauguration, the Permittee shall obtain approval of the access plan from the VCFPD. All required access shall be installed in conformance with the approved plan before the installation of new wells or facilities as authorized by this permit.

Monitoring and Reporting: A copy of the approved access plan shall be kept on file with the Fire Prevention Bureau. The Fire Prevention Bureau shall conduct a final inspection to ensure that the access is installed according to the approved plans. Unless a modification is approved by the Fire Prevention Bureau, the Permittee, and his successors in interest, shall maintain the access for the life of the development.

45. Access Road / Driveway Maintenance

Purpose: To ensure that adequate fire department access is provided in conformance with current California State Law and Ventura County Fire Protection District Ordinance.

Requirement: The Permittee shall maintain all on-site access road(s) and driveway(s) not included in a maintenance agreement. Repairs shall be made as needed or as required by the Fire District to maintain the original design and installation of the access road(s) and driveway(s).

Documentation: The Permittee shall submit an access plan to the Fire Prevention Bureau for review and approval.

Timing: Prior to the issuance of the Zoning Clearance for Use Inauguration, the Permittee shall obtain approval of the access plan from the VCFPD. All required access shall be installed in conformance with the approved plan before the installation of new wells or facilities as authorized by this permit. The access shall be maintained in conformance with approved plans for the effective period of this permit.

Monitoring and Reporting: The Fire District has the authority to inspect all on site access road(s) and driveway(s) as it deems necessary. The Permittee shall be responsible for ongoing maintenance of the access road and driveways and shall conduct repairs as required by the Fire District.

46. Turning Radius

Purpose: To ensure that adequate fire department access is provided in conformance with current California State Law and Ventura County Fire Protection District Ordinance.

Requirement: The Permittee shall provide a minimum 40-foot inside turning radius at all turns along the access roads/driveways.

Documentation: The Permittee shall submit an access plan to the Fire Prevention Bureau for review and approval.

Timing: Prior to the issuance of the Zoning Clearance for Use Inauguration, the Permittee shall obtain approval of the access plan from the VCFPD. All required access shall be installed in conformance with the approved plan before the installation of new wells or facilities as authorized by this permit. The access shall be maintained in conformance with approved plans for the effective period of this permit.

Monitoring and Reporting: A copy of the approved access plan shall be kept on file with the Fire Prevention Bureau. The Fire Prevention Bureau shall conduct a final inspection to ensure that the access is installed according to the approved plans. Unless a modification is

approved by the Fire Prevention Bureau, the Permittee, and his successors in interest, shall maintain the access for the life of the development.

47. Turnarounds

Purpose: To ensure that adequate fire department access is provided in conformance with current California State Law and Ventura County Fire Protection District Ordinance.

Requirement: The Permittee shall provide an approved turnaround area for fire apparatus where dead end Fire Department access roads / driveways exceed 150 feet. Required turnaround areas shall be designed such:

- a. Does not exceed a 5% cross-slope in any direction.
- b. Located within 150 feet of the end of the access road / driveway
- c. Posted as fire lanes in accordance with Ventura County Fire Protection District Standards.
- d. Kept free of obstructions at all times.

Documentation: The Permittee shall submit an access plan to the Fire Prevention Bureau for review and approval.

Timing: Prior to the issuance of the Zoning Clearance for Use Inauguration, the Permittee shall obtain approval of the access plan from the VCFPD. All required access shall be installed in conformance with the approved plan before the installation of new wells or facilities as authorized by this permit. The access shall be maintained in conformance with approved plans for the effective period of this permit.

Monitoring and Reporting: A copy of the approved access plan shall be kept on file with the Fire Prevention Bureau. The Fire Prevention Bureau shall conduct a final inspection ensure that turnaround areas are installed according to the approved plans. Unless a modification is approved by the Fire Prevention Bureau, the Permittee, and his successors in interest, shall maintain the turnaround areas for the life of the development.

48. Fire Lanes

Purpose: To ensure that adequate fire department access is provided in conformance with current California State Law and Ventura County Fire Protection District Ordinance.

Requirement: The Permittee shall post all fire lanes in accordance with California Vehicle Code, the International Fire Code and current Ventura County Fire Protection District Fire Lane Standards. All fire lane markings / signs shall be located within recorded access easements. The Permittee shall maintain all required fire lane markings / signs to be clearly visible.

Documentation: The Permittee shall submit an access plan to the Fire Prevention Bureau for review and approval.

Timing: Prior to the issuance of the Zoning Clearance for Use Inauguration and required Fire Code Permits, the Permittee shall obtain approval of the access plan from the VCFPD. All required access and signage shall be installed in conformance with the approved plan before the installation of new wells or facilities as authorized by this permit. The access shall be maintained in conformance with approved plans for the effective period of this permit.

Monitoring and Reporting: A copy of the approved access plan shall be kept on file with the Fire Prevention Bureau. The Fire Prevention Bureau shall conduct a final inspection to ensure that all fire lanes are installed according to the approved plans. Unless a modification is approved by the Fire Prevention Bureau, the Permittee, and his successors in interest, shall maintain the fire lanes for the life of the development.

49. Access Road Gates

Purpose: To ensure that adequate fire department access is provided in conformance with current California State Law and Ventura County Fire Protection District Standards.

Requirement: The Permittee shall design and install all gates along required fire access roads / driveways consistent with Fire Protection District Standards.

Documentation: The Permittee shall submit an access plan to the Fire Prevention Bureau for review and approval. The Permittee shall also provide a copy of the Zoning Clearance issued by the Planning Division.

Timing: Prior to the installation of any new gates, the Permittee shall obtain approval of the access plan from the VCFPD. All required access and gates shall be installed in conformance with the approved plan before the installation of new wells or facilities as authorized by this permit. The access roads and gates shall be maintained in conformance with approved plans for the effective period of this permit.

Monitoring and Reporting: A copy of the approved access plan shall be kept on file with the Fire Prevention Bureau. The Fire Prevention Bureau shall conduct a final inspection to ensure that access gates are installed according to the approved plans. Unless a modification is approved by the Fire Prevention Bureau, the Permittee, and his successors in interest, shall maintain the gates for the life of the development.

50. Alternate / Private Water Supply

Purpose: To ensure that adequate water supply is available for firefighting purposes where no water purveyor service is available or where the water purveyor certifies that the existing water system cannot provide the required fire flow and duration and approves the use of a private water system.

Requirement: The Permittee shall install a private water system (tank and hydrant). Private water systems shall not be supplied from substandard water systems that will impact available fire flow of existing structures. This may require the Permittee to upgrade the existing water purveyor's system to provide the required fire flow.

Documentation: The Permittee shall submit private water system plans to the Fire Prevention Bureau for review and approval.

Timing: Prior to the issuance of any Zoning Clearance for Construction of oil production facilities (including pipelines and wells) under this permit, the Permittee shall obtain approval of the water system plans from the VCFPD. The private water system shall be installed and operational before the installation of new facilities authorized by this permit. Before burial, all underground piping shall be visually inspected by the Fire Prevention Bureau. A building permit may be required for water system installation.

Monitoring and Reporting: A copy of the approved private water system plans shall be kept on file with the Fire Prevention Bureau. The Fire Prevention Bureau shall conduct on-site inspections to ensure that the private water system is installed according to the approved plans. Unless a modification is approved by the Fire Prevention Bureau, the Permittee, and his successors in interest, shall maintain the private water system for the life of the development.

51. Hazard Abatement

Purpose: To ensure compliance with Ventura County Fire Protection District Ordinance.

Requirement: The Permittee shall have all grass or brush adjacent to all oil production equipment cleared for a distance of 100 feet or to the property line if less than 100 feet.

Documentation: The Permittee shall submit a signed Ventura County Fire Protection District Form #126 "Requirement for Construction" to the Fire Prevention Bureau for review and approval. In the alternative, the Permittee may submit a written response to a "Notice to Abate" issued under the Fire District's Fire Hazard Reduction Program.

Timing: The Permittee shall obtain approval of the Form 126 from the VCFPD or other authorization from the VCFPD prior to the issuance of the Zoning Clearance for Use Inauguration. The Permittee shall remove all grass and brush as outlined by the Ventura County Fire Protection District's Fire Hazard Reduction Program guidelines before the installation of new facilities. A Zoning Clearance for Construction may be needed for any new facilities.

Monitoring and Reporting: The Fire Prevention Bureau shall conduct on-site inspections to ensure compliance with this condition.

52. Fire Safety Plan

Purpose: To minimize and mitigate the fire problems created by the project with the purpose of reducing impact on the community's fire protection delivery system.

Requirement: The Permittee shall prepare a Fire Safety Plan (FSP). The FSP shall be prepared by a qualified fire protection consultant as approved by the Ventura County Fire Protection District. The Permittee, all land owners and any tenants shall abide by the approved FSP.

Documentation: The Permittee shall submit the Fire Safety Plan (FSP) to the Fire Prevention Bureau for review and approval.

Timing: Prior to the issuance of the Zoning Clearance for Use Inauguration, the Permittee shall obtain the approval of the FSP from the VCFPD. The provisions of the FSP shall be implemented for the effective period of this permit.

Monitoring and Reporting: A copy of the approved Fire Safety Plan shall be kept on file with the Fire Prevention Bureau.

53. Fire Department Clearance

Purpose: To inform the Permittee of all fire department requirements applicable to the proposed project.

Requirement: The Permittee shall complete a VCFPD Form #126 "Requirements for Construction." for any new structures or additions to existing structures (including all production facilities) before issuance of a Zoning Clearance for Construction.

Documentation: The Permittee shall submit to the VCFPD a signed copy of the Ventura County Fire Protection District's Form #126 "Requirements for Construction" for review and approval.

Timing: The Permittee shall obtain approval of the Form 126 from the VCFPD (or other authorization from the VCFPD) prior to the issuance of the Zoning Clearance for Construction.

Monitoring and Reporting: A copy of the completed VCFPD Form #126 shall be kept on file with the Fire Prevention Bureau. The Fire Prevention Bureau will conduct a final on-site inspection of the project to ensure compliance with all conditions and applicable codes / ordinances.

54. Fire Code Permits

Purpose: In order to minimize fire hazards, the project shall be constructed in conformance with the requirements of the Ventura County Fire Code.

Requirement: The Permittee and/or tenant shall obtain all applicable Fire Code permits.

Documentation: The Permittee shall submit a Fire Code permit application along with required documentation/plans to the Fire Prevention Bureau for review and approval.

Timing: Prior to final occupancy clearance, installation or use of any required item or system, the Permittee must obtain approval of all necessary Fire Code permits.

Monitoring and Reporting: A copy of the approved Fire Code permits shall be kept on file with the Fire Prevention Bureau. The Fire Prevention Bureau shall conduct a final inspection to ensure that the requirements of the Fire Code permit are installed according to the approved plans. Unless a modification is approved by the Fire Prevention Bureau, the Permittee, and his successors in interest, shall maintain the conditions of the Fire Code permit for the life of the development.

55. Inspection Authority

Purpose: To ensure on going compliance with all applicable codes, ordinances and project conditions.

Requirement: The Permittee, by accepting these project conditions of approval, shall acknowledge that the fire code official (Fire District) is authorized to enter at all reasonable times and examine any building, structure or premises subject to this project approval for the purpose of enforcing the Fire Code and these conditions of approval.

Documentation: A copy of the conditions of approval of CUP PL14-0103.

Timing: The Permittee shall allow on-going inspections by the fire code official (Fire District) for the life of the project.

Monitoring and Reporting: A copy of the approved entitlement conditions shall be kept on file with the Fire Prevention Bureau. The Fire Prevention Bureau shall ensure ongoing compliance with this condition through on-site inspections.

56. Oil Well Drilling

Purpose: To ensure the project is implemented in conformance with the California Fire Code, National Fire Protection Association Standard #30 and Ventura County Fire Protection District requirements.

Requirement: The Permittee shall apply for and obtain a Fire Code Permit for well drilling. The Fire Code permit application shall include a plot plan drawn to scale or with dimensions showing all buildings and improvements within a radius of 300 feet of the exact location of the proposed wellhead.

Documentation: The Permittee shall submit a Fire Code Permit application at least two weeks prior to the commencement of drilling to the Fire Prevention Bureau for review and approval.

Timing: The Permittee shall obtain required Fire Code permits prior to the commencement of well drilling. Approval and on-site inspection by the Fire Prevention Bureau shall be completed before start of drilling.

Monitoring and Reporting: A copy of the approved Fire Code permits shall be kept on file with the Fire Prevention Bureau. The Fire Prevention Bureau shall conduct a final inspection to ensure that the requirements of the Fire Code permit are installed according to the approved plans. Unless a modification is approved by the Fire Prevention Bureau, the Permittee, and his successors in interest, shall maintain the conditions of the Fire Code permit for the life of the project.

Ventura County Air Pollution Control District (VCAPCD) Conditions

57. APCD Rules and Regulations for Tank Removal, Construction, Well Drilling and Trucking Activities

Purpose: To ensure that fugitive dust and particulate matter that may result are minimized.

Requirement: The Permittee shall comply with the provisions of applicable VCAPCD Rules and Regulations, which include but are not limited to, Rule 50 (Opacity), Rule 51 (Nuisance), and Rule 55 (Fugitive Dust).

Documentation: The Planning Division in consultation with the VCAPCD shall ensure compliance with the following provisions:

- I. The area disturbed by clearing, grading, earth moving, or excavation operations shall be minimized to prevent excessive amounts of dust;
- II. Pre-grading/excavation activities shall include watering the area to be graded or excavated before commencement of grading or excavation operations. Application of water should penetrate sufficiently to minimize fugitive dust during grading activities;
- III. Graded and/or excavated inactive areas of the construction site shall be monitored at least weekly for dust stabilization. Soil stabilization methods, such as water and roll compaction, and environmentally safe dust control materials, shall be periodically applied to portions of the construction site that are inactive for over four days. If no further grading or excavation operations are planned for the area, the area should be hydro-seeded and watered until growth is evident, or periodically treated with

environmentally safe dust suppressants, to prevent excessive fugitive dust.

- IV. Signs shall be posted onsite limiting traffic to 15 miles per hour or less.
- V. Signs displaying the APCD Complaint Line Telephone number for public complaints shall be posted in a prominent location visible off the site: (805) 645-1400 during business hours and (805) 654-2797 after hours.

Timing: Throughout site preparation and drilling.

Reporting and Monitoring: The Planning Division in consultation with the VCAPCD shall monitor all dust control measures during grading activities.

58. APCD Rules and Regulations

Purpose: To ensure that project operations shall be conducted in compliance with all applicable VCAPCD Rules and Regulations, in particular Rule 10, (Permits Required) new tanks will require APCD permits prior to installation.

Requirement: The Permittee shall obtain an Authority to Construct prior to installation and a Permit to Operate prior to operation.

Timing: The Permittee shall submit to the APCD the appropriate applications for an Authority to Construct new tanks or a new well. Prior to the issuance of a Zoning Clearance for construction of new tanks or for the drilling of a new well the Permittee shall provide the Planning Division with an APCD approved Authority to Construct.

Documentation: The Permittee shall submit an APCD approved Authority to Construct prior to the issuance of a Zoning Clearance for construction of new tanks and prior to the issuance of a Zoning Clearance for the drilling of a new well.

Monitoring and Reporting: A copy of the Authority to Construct shall be maintained as part of the project file. Ongoing compliance with the requirements of the Permit to Operate shall be accomplished through field inspection by APCD Inspectors.

Ventura County Agricultural Commissioner's Office Conditions

59. Notification to Agricultural Owners and Operators

Purpose: In order to minimize potential conflicts between agricultural operations within 300 feet of the project boundary and the permittee (currently Renaissance Petroleum, LLC). Communication is necessary between the two parties to avoid potential conflicts with pesticide applications.

Requirement: The permittee shall initiate and maintain communication with owners and operators of agriculturally-zoned properties and properties in agricultural production, located within 300 feet of the project boundary.

Documentation: The permittee shall provide a written schedule of days and hours of operation to owners and operators of properties in agricultural production located within 300 feet of the project boundary. This schedule shall specify the day and time that the employees will be present at the project site.

Timing: Notice shall be provided on annual basis and whenever days and hours of operations change.

Monitoring: The permittee (currently Renaissance Petroleum, LLC.) shall obtain a list of current contact information for agricultural operators for properties located within 300 feet of the project boundary from the Ventura County Agricultural Commissioner's Office on an annual basis. The Ventura County Agricultural Commissioner's Office will keep record of the permittee's requests for contact information and report to the Planning Division any failures to comply with this condition.

60. Additional Dust Control

Purpose: In order to minimize potential emanation of dust and conflicts between a non-agricultural use and adjacent agricultural operations within the project boundary. Dust is harmful to agricultural resources as particulates can contaminate crops, spread disease and disrupt photosynthesis in plants.

Requirement: The permittee shall keep dust at an absolute minimum within the project boundary at all the times.

Documentation: No documentation is needed.

Timing: The permittee shall respond immediately to any complaint from agricultural operators within 300 feet of the project boundary and implement the best remedy to the problem.

Monitoring: The permittee (currently Renaissance Petroleum, LLC.) shall obtain a list of current contact information for agricultural operators for properties located within 300 feet of the project boundary from the Ventura County Agricultural Commissioner's Office on an annual basis. The Ventura County Agricultural Commissioner's Office will keep record of the permittee's requests for contact information and report to the Planning Division any failures to comply with this condition.

MITIGATED NEGATIVE DECLARATION (MND) ADDENDUM

Renaissance Petroleum Project

Case No. PL14-0103

A. BACKGROUND INFORMATION AND PROJECT DESCRIPTION:

1. **Entitlement:** The applicant requests that a modified Conditional Use Permit (CUP) be granted to authorize the expansion and continued operation of an existing oil and gas facility. (Case No. PL14-0103).
2. **Location:** 3214 Etting Road, Oxnard area
3. **Assessor's Parcel Number:** 232-0-062-030
4. **Lot Size:** 26.87 acres
5. **General Plan Land Use Designation:** Agricultural
6. **Zoning Designation:** AE-40 ac (Agricultural Excusive, 40-acre minimum lot size)
7. **Project Description:**

The applicant requests that a modified Conditional Use Permit (CUP) be granted to authorize the expansion and continued use of an existing oil and gas facility. The proposed project includes the following components:

- a) Installation, testing, operation, reworking, and maintenance of a total of five oil and gas wells (i.e. one existing well and four proposed wells). The existing oil and gas well is designated as Naumann No. 1 (API No. 11121431) with the coordinates (NAD83): 34.1603, -119.131007. The four proposed oil and gas wells and pumping units will be designated as Naumann No. 2, No. 3, No. 4, and No. 5, and will be located on the existing drilling pad. All of the drilling, completion, and production operations will be conducted in accordance to the rules and regulations of the California Department of Conservation, Division of Oil and Gas and Geothermal Resources ("DOGGR");
- b) The operation of equipment such as pumps, heaters, and refrigeration systems, and compressors for the separation of natural gas and produced water from crude oil, the separation of natural gas liquids from produced natural gas, and the processing of the natural gas to the specifications established by the

Southern California Gas Company ("SCGC") for the introduction of the natural gas into the SCGC distribution pipeline system for sale to local customers;

- c) The operation of equipment such as pumps and compressors to support the on-site injection of produced water into a well or wells for disposal purposes or the on-site injection of natural gas into a well or wells for the purpose of reservoir pressure maintenance, or for the utilization of natural gas for gas lifting liquids from wells. (One well is currently authorized to be used for injection purposes.). Any injection activities will only involve water or gas produced at the Naumann Drillsite or the Rosenmund Drillsite (another approved drillsite within the Cabrillo field which is discussed below);
- d) The transport of gas, natural gas liquids, crude oil, and produced water from the site (produced water may be transported to the Rosenmund Drillsite, or to a permitted commercial facility for disposal);
- e) The construction and operation of equipment and structures associated with the storage, processing, and transporting of oil, gas, natural gas liquids, and water, as shown on project plans;
- f) An increase in the permitted number of truck trips associated with the transport of produced fluids from 4 one-way trips per day (2 truckloads) to 20 one-way trips per day (10 truckloads) to account for the anticipated increase in production. Truck transport of fluids will be limited to 4 one-way trips during peak traffic hours. The remaining 16 one-way trips will occur during non-peak hours;
- g) Extension of the hours of fluid transport (trucking) to 24 hours per day, 7 days per week from the currently authorized 7:30am to 6:30pm Monday through Saturday schedule; and,
- h) Modifications of the ancillary equipment used at the facility as follows:
 - i. Removal of two existing 500-barrel crude oil storage tanks;
 - ii. Removal of one existing 500-barrel produced water tank;
 - iii. Installation of two new 1,000-barrel crude oil storage tanks;
 - iv. Installation of one new 1,000-barrel produced water storage tank;
 - v. Relocation of one existing 500-barrel fire water storage tank;
 - vi. Relocation of one existing 20-foot tall light post; and,
 - vii. Relocation of one existing emergency gas flare.

Each of the three proposed new tanks is 21 feet in diameter and 16 feet in height.

The authorized Naumann Drillsite serves as the hub for operations of the Cabrillo Oil Field. The authorized oil and gas facility currently includes two gathering pipelines owned and operated by Renaissance Petroleum, LLC. The two gathering pipelines connect the Naumann Drillsite to the oil and gas facilities designated as Rosenmund Drillsite, authorized by CUP 5252. The Rosenmund Drillsite is located at 2797 East Pleasant Valley Road. Oil, gas and water produced at the Rosenmund Drillsite are conveyed by gathering pipelines to processing and storage facilities on the Naumann Drillsite in compliance with Section 8107-5.5.7 of the Ventura County Non-Coastal Zoning Ordinance. The gathering pipelines are regulated and administered by DOGGR.

No additional grading or expansion of the existing drilling pad is proposed. The applicant requests that the permit expiration date be extended from the Year 2037 to the year **TBD (30 years after the effective date of the permit)**.

B. STATEMENT OF ENVIRONMENTAL FINDINGS:

Pursuant to CEQA (Public Resources Code § 21000 et seq.) and the CEQA Guidelines (Title 14, California Code of Regulations, Division 6, Chapter 3, § 15000 et seq.), the subject application is a "project" that is subject to environmental review.

On December 19, 1986, the Planning Director granted CUP 4384 to authorize the installation, operation and maintenance of one exploratory oil and gas well and associated facilities. The processing operations permitted at the well site under CUP 4384 are the separation of produced water and natural gas from crude oil and those processing operations required for injection purposes and for the transportation of production products from the site. The CUP was granted for a period of 20 years with an expiration date on December 23, 2006. As part of this action, a Mitigated Negative Declaration (MND) was adopted. This MND is attached as Exhibit 4b. The CEQA Guidelines [§ 15164(b)] state that the lead agency shall prepare an addendum to an adopted MND if (1) minor changes or additions are necessary but (2) none of the conditions described in the CEQA Guidelines (§ 15162) calling for the preparation of a subsequent MND have occurred. This MND Addendum includes a description of the changes or additions that are necessary to the MND and a discussion of why none of the conditions described in the CEQA Guidelines exist which require the preparation of an EIR or subsequent MND.

In summary, the proposed project involves the continued use of an existing disturbed drillsite for oil and gas activities. No new disturbance of land, loss of agricultural soils, or other substantial environmental effect has been identified that would result from

the proposed project. The increase in truck traffic volume of 16 one-way trips per day will be limited to non-peak hours under the recommended conditions of approval. The proposed expansion of the trucking hours to 24 hours per day will also distribute the truck trips associated with the project over a longer time period. Thus, no new potentially significant impact on traffic will result from the proposed project. The oil and gas production and associated injection operations will be subject to engineering standards and regulations enforced by the California Division of Oil and Gas and Geothermal Resources (DOGGR). The operator will be required by DOGGR to prepare and implement a Spill Prevention Control and Countermeasure Plan (SPCC). No substantial evidence has been identified that these facilities will result in a significant impact on surface or groundwater resources.

The MND identified an impact on agricultural resources due to the loss of a portion of the existing onsite citrus (lemon) orchard. The land owner was also under a LCA Contract. Because the project involved the removal of a part of the orchard to create the drillsite, the permit was conditioned to mitigate the impacts on the citrus trees. Mitigation measures included limiting the graded site to 28,000 square feet in area, replanting of trees of the same variety when the well was abandoned and minimizing dust along access roads.

On May 21, 2007, the Planning Director granted a modified permit (CUP No. LU05-0086) to authorize the drilling of an additional well and construction of two gathering pipelines. The approved site plan includes a 140 foot by 295 foot (41,300 square feet) drilling pad. The permitted uses included one existing well for oil and gas production, and injection, and the addition of one new well for oil and gas production, and injection. The second well was required to be drilled by May 31, 2012 but was not completed. The project was determined to be categorically exempt from CEQA review pursuant to Sections 15302 and 15303.

The conditions described in Section 15162 of the CEQA Guidelines which require the preparation of an EIR or subsequent negative declaration, are provided below, along with a discussion as to why an EIR or subsequent negative declaration is not required:

- 1. Substantial changes are proposed in the project which will require major revisions of the previous MND due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects [§ 15162(a)(1)].**

The proposed project involves the continued use of an existing disturbed drillsite for oil and gas activities. No new disturbance of land, loss of agricultural soils, or other substantial environmental effect has been identified that would result from the proposed project. The potential increase in truck traffic volume of 16 one-way trips per day will be limited to non-peak hours under the recommended conditions

of approval. The proposed expansion of the trucking hours to 24 hours per day will also distribute the truck trips associated with the project over a longer time period. Thus, no new potentially significant impact on traffic will result from the proposed project.

The oil and gas production and associated injection operations will be subject to engineering standards and regulations enforced by the California Division of Oil and Gas and Geothermal Resources. The operator will be required by DOGGR to prepare and implement a Spill Prevention Control and Countermeasure Plan (SPCC). No substantial evidence has been identified that these facilities will result in a significant impact on surface or groundwater resources.

The proposed project is an existing oil and gas facility and is not a noise sensitive use. The site is located about 500 feet north of Highway 1. Traffic on this highway contributes to the ambient noise in the area. The proposed additional oil and gas activities would be similar to the existing permitted activities. The proposed activities will generate noise during construction (well and ancillary facility installation), operation of pumping units, and truck traffic. The well drilling activities are temporary and would involve only a few months of the 30-year lifespan of the project. The pumping units are electrically-powered and do not generate substantial noise. In any case, the nearest noise sensitive uses are single-family residences located approximately 500 feet to the west of the proposed project site (approximately 250 north of Highway 1), and 2,000 feet to the east of the site. At these distances/locations, the noise generated from the activities included in the proposed project would not exceed the noise thresholds established in County policy. Additionally, the proposed project will be subject to conditions of approval to maintain project related noise levels measured at the residential areas below the policy limits or to obtain waivers from the affected parties. Finally, the noise from the increased trucking operations are not subject to the County noise policy as the trucks would be travelling on roads included in the Regional Road Network.

The additional equipment, and reconfiguration of the existing onsite equipment, will not substantially change the visual character of the site as viewed from the surrounding area.

The proposed operation of four additional oil wells and the additional trucking of produced fluids will result in increased emissions of the criteria pollutants nitrous oxides (NO_x) and reactive organic compounds (ROC). Each new oil well will result in an additional 2 pounds per day of ROC emissions according to the Ventura County Air Pollution Control District (VCAPCD). However, oil wells are facilities subject to permits issued by the VCAPCD. According to the adopted Air Quality Assessment Guidelines (AQAG), the emissions of such facilities are not counted toward the 25 pound/day Threshold of Significance. In any case, the four

new oil wells will emit an estimated 8 pounds per day of ROC. This is less than the 25 pound per day Threshold of Significance established in the adopted AQAG.

The potential additional 16 one-way truck trips per day would result in an increase in NOx emissions. The NOx emissions are estimated to be less than three pounds per day. This is less than the 25 pounds per day Threshold of Significance established in the AQAG.

Based on the above discussion, the proposed project does not include any substantial changes in the existing permitted facility which would require major revisions to the previous MND due to the involvement of new significant effects or an increase in severity of a previously-identified significant effect.

- 2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous MND due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects [§ 15162(a)(2)].**

There have been no substantial changes in the circumstances under which the original project was analyzed which would require revisions in the adopted MND. The character and use of the surrounding agricultural lands have not changed since the project was initially approved.

- 3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time Planning Director adopted the previous MND, shows any of the following:**

- a. The project will have one or more significant effects not discussed in the previous MND [§ 15162(a)(3)(A)].**

There is no new information of substantial importance that indicates the project will have any new significant effects not discussed in the previous MND. Since the project was originally reviewed and the MND adopted, environmental concerns regarding global climate change and greenhouse gas (GHG) emissions have been raised. The GHG emissions for the proposed new wells and additional truck transport is estimated to be 737.5 Metric Tonnes CO₂ equivalent (MTCO₂e) including fugitive methane emissions from the wells and projected combustion emissions from the emergency flare. This is far less than the 10,000 MTCO₂e Threshold of Significance cited by the Ventura County Air Pollution Control District. Therefore, the impact on climate change due to GHG emissions will be less than significant.

Therefore, based on the information provided above, there is no substantial evidence to warrant the preparation of a subsequent MND. The decision-making body shall consider this addendum to the adopted MND prior to making a decision on the project.

C. PUBLIC REVIEW:

Pursuant to the CEQA Guidelines [§ 15164(c)], this addendum to the MND does not need to be circulated for public review, and shall be included in, or attached to, the adopted MND.

Prepared by:


Monica Hood, Case Planner
Commercial & Industrial Permit Section

Reviewed for Release to the Public by:


Brian R. Baca, Manager
Commercial & Industrial Permit Section

The Planning Director finds that this Addendum has been completed in compliance with the California Environmental Quality Act.


Kim L. Prillhart, Director
Ventura County Planning Division

4-3-17
Date

RESOURCE MANAGEMENT AGENCY
county of ventura

Planning Division

FINAL
MITIGATED NEGATIVE DECLARATION

A. PROJECT DESCRIPTION:

1. Entitlement: Conditional Use Permit No. 4384
2. Applicant: Cities Service Oil and Gas Corp
3. Location: (see attached map): Between Etting Road and State Highway 1, approximately 1/2 mile east of Pleasant Valley Road, City of Oxnard Area of Interest.
4. Assessor Parcel No(s): 232-062-03
5. Parcel Size: 26.87 acres; Permit Area: 28,000 sq. ft.
6. General Plan Designation: Agriculture (Open Space Element)
7. Existing Zoning: "A-E" (Agricultural Exclusive)
8. Project Description: Drilling of one exploratory oil/gas well and production if hydrocarbons are found.
9. Responsible Agencies: California Division of Oil and Gas

B. STATEMENT OF ENVIRONMENTAL FINDINGS

California State Law requires that an Initial Study (environmental evaluation) be conducted to determine if this project could significantly affect the environment. An Initial Study was conducted by the Planning Division to evaluate the potential effect of this project on the environment. Based on the findings contained in the attached Initial Study it has been determined that this project could have a significant effect on the environment. Therefore, a Mitigated Negative Declaration has been prepared, pursuant to the provisions of California Environmental Quality Act (Sec. 15073). The potentially significant impacts can be satisfactorily mitigated through adoption of the following identified measures as conditions of approval.

C. POTENTIALLY SIGNIFICANT ENVIRONMENTAL IMPACTS IDENTIFIED AND PROPOSED MITIGATION MEASURES

1. #1 - Discussion of Impact

The subject site is currently planted in citrus (lemon) orchard, and is under an LCA Contract. The proposed two acre permit area will have to be cleared of all the lemon trees prior to the start of drilling and through the life of the permit, if production is reached.

Mitigation

- a. The proposed two acre permit area will be reduced to 28,000 sq. ft. This area is adequate to drill one exploratory oil/gas well, and to install production if oil and/or gas is found.
- b. Trees of the same variety shall be planted as close to the well as possible/practical when the well is abandoned, or completed.
- c. Dust will be kept to an absolute minimum along access roads, and within the permit area.

County of Ventura
Planning Director Hearing
PL14-0103
**Exhibit 4b - Mitigated Negative
Declaration**

D. PUBLIC REVIEW:

1. Legal Notice Method: Direct mailing to property owners within 300 feet of proposed project boundary.
2. Document Posting Period: October 31, 1986 to December 2, 1986
3. Environmental Report Review Committee Hearing Date: December 3, 1986
4. Place: Hall of Administration, Multi-Purpose Room, Room 344, Third Floor.
5. Time: 1:30 p.m.

Prepared by: James Carls
Case Planner

Reviewed by:

Robert K. Laughlin
Supervisor
Commercial/Industrial Land Use
Section

The Environmental Report Review Committee recommends that the decision-making body find that this document has been completed in compliance with the California Environmental Quality Act.

Barbara Smith
Chair, Environmental Report
Review Committee

12/5/86
Date

RKL:bb/J225

COUNTY OF VENTURA
RESOURCE MANAGEMENT AGENCY
803 S. VICTORIA AVENUE
VENTURA, CA 93009

CONSENT AGREEMENT FOR PROPOSED MITIGATION
MEASURES WITH MITIGATED NEGATIVE DECLARATION

COUNTY OF VENTURA
RESOURCE MANAGEMENT AGENCY

ENTITLEMENT NO.: CUP-6384

I, Citrus Service Oil & Gas Company, applicant, hereby agree to the proposed Mitigation Measures which have been developed in conjunction with the preparation of a Mitigated Negative Declaration for the proposed project. I understand that these Mitigation Measures or substantially similar measures must be adopted as conditions or approvals with this permit, except in order to reduce identified potential environmental impacts to an acceptable level, and to avoid the necessity of preparing an Environmental Impact Report for this project.

The potentially significant environmental issues and the proposed Mitigation Measures are as follows:

I. #1 - Discussion of Impact

The subject site is currently planted in citrus (lemon) orchard, and is under an LCA Contract. The proposed two acre permit area will have to be cleared of all the lemon trees prior to the start of drilling and through the life of the permit, if production is reached.

Mitigation

- a. The proposed two acre permit area will be reduced to 28,000 sq. ft. This area is adequate to drill one exploratory oil/gas well, and to install production if oil and/or gas is found.
- b. Trees of the same variety shall be planted as close to the well as possible/practical when the well is abandoned, or completed.
- c. Dust will be kept to an absolute minimum along access roads, and within the permit area.

Applicant's Signature

Applicant's Address

Date


P.O. Box 939

Bakersfield, CA 93302

December 2, 1986

JG:bb/J253



Ventura County
Resource
Management
Agency

CUP-4384



INITIAL STUDY

A. PROJECT INFORMATION

1. Project No.: Conditional Use Permit No: 4384
2. Name of Applicant: Cities Service Oil and Gas Co.
3. Project Location: between Kering Rd and State Highway 1
approximately 1 1/2 miles east of Pleasant Valley Rd
4. Project Description: Drilling of one exploratory oil and gas well
(30-35 days) and the installation of production equipment if
if production is reached.

B. ENVIRONMENTAL IMPACT CHECKLIST

PLANNING DIVISION

1. Land Use

Will the project, individually or cumulatively, alter the planned land use of an area?

Impact? Significant?
Yes Maybe No Yes Maybe No

X — — — — X

2. Growth Inducement

Will the project, individually or cumulatively, induce growth in an area?

— — X — — —

3. Housing

Will the project, individually or cumulatively, affect existing housing, or create a demand for additional housing?

— — X — — —

4. General Plan Consistency

Will the project, individually or cumulatively, conflict with any environmental goal, objective, policy or program of the General Plan?

— — X — — —

5. Mineral and Oil Resources

Will the project, individually or cumulatively, result in:

a. The depletion of mineral or oil resources?

— X — — — X

b. Hampering or precluding access to or the extraction of, mineral or oil resources?

— — X — — —

		Impact?			Significant?		
		Yes	Maybe	No	Yes	Maybe	No
b.	An effect on existing parking facilities, or demand for new parking?			X			
c.	An impact upon existing transportation systems?						X
d.	Alterations to present patterns of circulation or movement of people and/or goods?			X			
e.	Alterations to rail traffic?			X			
f.	An increase in traffic hazards to motor vehicles, bicyclists or pedestrians?			X			
10. Flood Control							
Will the project, individually or cumulatively, result in or be impacted by:							
a.	Changes to absorption rates, drainage patterns, or the route and/or amount of surface water runoff?			X			
b.	The alteration to the course or flow of flood waters?			X			
c.	The exposure of people, property or unique natural resources to hazards such as flooding or tsunami?			X			
d.	An effect on a channel or stream regulated by the Flood Control District?			X			
e.	Changes in currents, or the course of direction of water movements, in any body of water?			X			
f.	A flood plain indicated on the Ventura County Flood Insurance Rate Maps?			X			
11. Water Resources							
Will the project, individually or cumulatively, result in or be impacted by:							
a.	A decrease of surface water quantity?			X			
b.	The degradation of surface water quality?			X			
c.	A decrease of groundwater quantity?			X			
d.	The degradation of groundwater quality?			X			
e.	A high groundwater table?	X					X

		Impact			Significance		
		Yes	Maybe	No	Yes	Maybe	No
<u>GENERAL SERVICES AGENCY</u>							
18.	<u>Recreation</u> Will the project, individually or cumulatively, result in impacts on recreational opportunities or facilities?			X			
19.	<u>Harbors</u> Will the project, individually or cumulatively, result in an impact on harbors?			X			
<u>AIRPORTS DEPARTMENT</u>							
20.	Will the project, individually or cumulatively, result in impacts on:						
a.	Air traffic safety?	X					X
b.	Existing airport facilities?	X					X
<u>AGRICULTURAL DEPARTMENT</u>							
21.	<u>Agricultural Resources</u> Will the project, individually or cumulatively, result in:						
a.	The conversion of prime agricultural land to other uses?	X			X		
b.	The loss of productive crop land or soils?	X			X		
c.	An adverse effect on adjacent agricultural land?			X			
<u>AGUAS TO BE COMPLETED BY THE AGENCY RESPONSIBLE FOR ADMINISTERING THE PROJECT</u>							
22.	<u>Visual Effects</u> Will the project, individually or cumulatively, result in the obstruction of a scenic resource or view open to the public, or will the project result in the creation of an aesthetically offensive site open to public view?	X					X
23.	<u>Light and Glare</u> Will the project, individually or cumulatively, produce light or glare?	X					X
24.	<u>Noise and Vibrations</u> Will the project, individually or cumulatively, result in the exposure of people to increased noise or vibrations?	X					X
25.	<u>Public Facilities and Utilities</u> Will the project, individually or cumulatively, have an effect upon, or result in a need for new or altered services in any of the following areas:						
a.	Sewers or sewage treatment plants?			X			

	Impact?			Significant?		
	Yes	Maybe	No	Yes	Maybe	No
c. Introduction of new plant species into an area, or the introduction of a barrier to the normal replenishment of existing species?			X			
d. Change in the diversity of species, numbers or habitat of any animal species which are locally sensitive or unique?			X			
e. Disturbance or reduction in the numbers of any State or Federally listed rare, threatened or endangered animal species or their habitats?			X			
f. Introduction of new animal species into an area?			X			
g. Introduction of barriers to movement of any resident or migratory fish or wildlife species?			X			
h. Introduction of factors adverse to the existing ecological balance?			X			
i. Introduction of substances, human activity, structures or other factors that would damage, change or hamper an existing locally sensitive or unique ecosystem?			X			
<p>C. <u>DISCUSSION OF RESPONSES TO CHECKLIST</u></p> <p><u>N.E.W.</u></p> <p>(Agency responses are attached here.)</p>						

Here are your
originals
8.

RESOURCE MANAGEMENT AGENCY
of ventura

Planning Division

NOTICE OF PUBLIC REVIEW OF A
DRAFT MITIGATED NEGATIVE DECLARATION

TO CONCERNED PARTIES:

The Planning Division is currently processing the land use permit request described below. California State law requires that an Initial Study (environmental evaluation) be conducted to determine if such project could significantly affect the environment. Based on the Initial Study, it was determined that significant effects upon the environment could occur; however, mitigation measures can be adopted which will reduce these impacts to acceptable levels. Therefore, a Mitigated Negative Declaration has been prepared, pursuant to the provisions of CEQA (Sec. 15073).

A. PROJECT DESCRIPTION

1. Entitlement: Conditional Use Permit No. 4334
2. Applicant: Cities Service Oil and Gas Corp.
3. Location: (see attached map): Between Etting Road and State Highway 1, approximately 1½ miles east of Pleasant Valley Road, City of Oxnard Area of Interest, California
4. Assessor Parcel No(s): 232-062-33
5. Parcel Size: 28.67 acres.
6. General Plan Designation: "Agriculture" (Open Space Element).
7. Relating Zoning: "A-E" (Agricultural Exclusive).
8. Proposal: Drilling of 1 exploratory oil and gas well, and production if hydrocarbons are found.

B. PUBLIC REVIEW

The public review period of the Draft Mitigated Negative Declaration is from October 31, 1980 to December 2, 1980. In addition, the Ventura County Environmental Report Review Committee will hold a public hearing on the adequacy of the Draft Mitigated Negative Declaration at 1:30 p.m. on December 3, 1980, in the Multi-Purpose Hearing Room, Room 344, Third Floor, Hall of Administration, 800 South Victoria Avenue, Ventura, CA 93009. You are welcome to attend this hearing, and to comment on the adequacy of the Draft Mitigated Negative Declaration. If you are unable to attend, written comments on this document may be submitted to James Caruso, Planning Division, Resource Management Agency, 800 South Victoria Avenue, Ventura, CA 93009.

Copies of this Draft Mitigated Negative Declaration may be reviewed or obtained at the above address. If you have any questions, please phone James Caruso at (805) 654-2453.

JC:j1/J349

Attachment:
Location Map

C. Distribution of Impacts

1. Land Use - The present land use in the area is agriculture (lemon orchard on site). Drilling of one exploratory well and installation of production equipment (pump, tanks, etc.) will necessarily remove land from agricultural production. The 28,000 square feet of land needed for drilling and production represents less than 0.01% of the 28 acre parcel on which the well is to be located. This figure is deemed to be insignificant.
2. Growth Inducement - Drilling of and production from the well has no growth inducing impacts.
3. Housing - No new employees of the applicant will be needed to complete this well. Therefore, no new housing will be needed.
4. General Plan Consistency - A review of the Ventura County General Plan indicates no conflict between the project and the General Plan.
5. Mineral and Oil Resources - The purpose of the proposed project is to locate and develop oil and gas resources. Therefore, if oil and/or gas is found, and pumped from the ground, the resource(s) will be depleted. However, the completion of one well will not significantly deplete the resource(s).
6. Solid Waste Facilities - The Ventura County Ordinance Code Section 810-3.6.4 requires the proper handling and disposal of contaminants. Other materials such as broken concrete, paper, brush, etc., can be disposed of at appropriate landfill sites. The project shall produce such wastes in very small quantities, and therefore shall not have a significant effect on solid waste facilities.

7. Air

- (a)(1) Based on the criteria contained in Ventura County's Guidelines for the Preparation of Air Quality Impact Analyses for determining a project's potential impact on air quality, the subject project will not have a significant adverse impact on air quality.
- (a)(2) Due to the nature and location of the proposed project, and the small amount of earth (17 cu. yds.) to be moved to create the drilling pad, the project is not expected to cause local air quality impacts.
- (a)(3) All well projects generally do not produce air quality impacts.
- (b)(1) Agricultural spraying in the area may impact the project site. The degree of impact will depend on such factors as type and amount of material sprayed, method and frequency of spraying, distance of the drilling rig from areas sprayed, and wind direction and speed. Since the drilling operation is temporary, and agricultural spraying operations in the area infrequent, personnel at the drilling site are not expected to be adversely impacted by the application of pesticides on nearby crops.
- (b)(2) Odors associated with agricultural spraying in the area may impact the project site. The degree of impact will depend on such factors as type and amount of material sprayed, method and frequency of spraying, distance of the drilling rig from areas sprayed, and wind direction and speed. Since the drilling operation is temporary, and agricultural spraying operations in the area infrequent, personnel at the drilling site are not expected to be adversely impacted by odors resulting from the application of pesticides on nearby crops.

8. Earth - The Public Works Agency comments that pursuant to the County's Zoning Ordinance Section 8107-5, the proposed project site would not impact, nor be impacted by, any earth characteristics that might be present. The proposed amount of grading identified is insignificant to County standards.
9. Transportation/Circulation - The Public Works Agency comments that the proposed project will impact the County's road system in the area. However, the Agency considers the impact to be insignificant since the roads are adequately developed to handle the amount and type of traffic identified in the environmental assessment.

Consequently, the Agency will not require any mitigation.
10. Flood Control - The Public Works Agency comments that within the area of the proposed project site, the Agency's records show that the site has no historical evidence of being impacted by, or impacting, any flood storm water.
11. Water Resources - The Public Works Agency comments that pursuant to Section 8107-5.6.1 of the County's Zoning Ordinance, any impacts on surface and ground waters would be alleviated by the requirements of the ordinance.

The Agency's records indicate the presence of high ground water table. However, the nature of the proposed project would not impact, or be impacted by, the level of the ground water.
12. Sanitation - The project will not utilize an individual disposal system.
13. Water Supply - The project is not required to provide a long-term water supply.
14. Risk of Upset - The provisions of hazardous materials and zoning ordinances, require steps be taken to minimize the possibility of risk of upset. These ordinances reduce possible impacts to insignificant levels.
15. Human Health - See number 14 above.
16. Fire Protection -
 - (a) Two fire stations are located within five miles of the project site.
 - (b) Adequate personnel and equipment are available at these stations.
 - (c) The project is not located in a high fire hazard area.
 - (d) The site is located 500 feet off a paved road. Adequate access for fire equipment is available.
 - (e)(E) The provisions of the Uniform Fire Code adequately address these issues. No further mitigation is required. The applicant must apply for and obtain a Uniform Fire Permit.
17. Sheriff's Department -
 - (a) The applicant proposes to secure the project by fencing.
 - (b) Adequate roads are available to the site.
 - (c) No locational impacts are evident from the project's location. Regular Sheriff patrols frequent the area.

18. Recreation - The project is not located near any recreational facilities and shall not generate the need for additional recreational facilities.
19. Harbors - No harbor emplacements are feasible from this project.
20. Airports - The project is located approximately two miles northwest of the end of the Point Mugu runways. The FAA requires a warning beacon be installed atop the drilling mast. This impact is insignificant.
21. Agricultural Resources - The subject site is currently planted in citrus (lemon) orchard, and is under an LCA Contract. The proposed two acre permit area will have to be cleared of all lemon trees prior to the start of drilling and through the life of the permit if production is reached.

Mitigation

- a. The proposed two acre permit area shall be reduced to one acre or less. This area is adequate to drill one exploratory oil/gas well, and to install production equipment.
 - b. Trees of the same variety shall be planted as close to the well as possible/practical when the well is abandoned or completed.
 - c. Dust shall be kept to an absolute minimum along access roads and within the permit area by damping or chemical dust binding.
22. Visual Effects - Due to the surrounding orchard, the only phase of the project to be visible from public roads or neighboring property will be the drilling rig mast. This mast will be approximately 160 feet high and will remain in place for 30-35 days. This impact is deemed to be insignificant due to its temporary nature.
23. Light and Glare - This impact is insignificant due to the controlling provision of the Ventura County Ordinance Code Section 8107-5.6.7.
24. Noise and Vibration - Noise impacts are deemed to be insignificant due to the provisions of Ordinance Code Sections 8107-5.6.13 through 8107-5.6.21.
25. Public Facilities and Utilities - The project will have no interaction with any of the mentioned facilities with the possible exception of electrical transmission. According to APCU rules, the drilling phase and 90 days of the production phase can be powered by diesel-electric generators. After the initial 90 days of production permanent grid power must be brought to the site. This single service extension is insignificant.
26. Energy - As noted above, a diesel-electric generator will power the drilling rig. The amount of fuel needed for this generator is relatively small. No significant impact is expected.
27. Cultural/Ethnic Resources - According to the Ventura County Archaeological Society, no impacts on cultural or ethnic resources are expected.
28. Biological Resources - The biological systems prevalent in the area have been given over entirely to permanent agriculture. The permit site, and all adjacent lands within approximately one-half mile, have been cleared of natural vegetation. The permit area itself will not act as a barrier to wildlife movement due to its size and the fact that it is surrounded on all sides by agricultural lands.

JC:j/L14



CITY OF

Oxnard

COMMUNITY DEVELOPMENT DEPARTMENT • 305 W. THIRD ST. • OXNARD, CA 93030 • (805) 984-4637

RICHARD L. MAGGIO, DIRECTOR

November 21, 1986

Mr. Robert Laughlin, Supervisor
Commercial/Industrial Land Use Section
Planning Division
Resource Management Agency
800 South Victoria Avenue
Ventura, California 93009

Dear Mr. Laughlin:

Subject: Draft Mitigated Negative Declaration for Conditional Use Permit
(CUP) No. 4384 and Mitigation of Oil Development-Related Impacts on
the Oxnard Plain

After reviewing the Draft Mitigated Negative Declaration for CUP 4384 and the history of similar types of proposed exploratory and production oil development projects over the past several years, it seems timely to state that we are becoming concerned about the total number of proposals for the area surrounding the City of Oxnard. I would like to take the opportunity to highlight our concerns and ask that you apply them to CUP 4384, as well as other applications, as appropriate. The concerns are as follows:

1. Visual Impacts--The City has several principal entranceways and many that might seem minor now, but will have greater importance in the future. Visual separation and screening of entranceways should be provided wherever possible by requiring that the actual drilling site be located as far as possible from the entranceway road and that existing or added plant material be used to as great an extent as practical to either screen the drilling equipment or interrupt its rectilinear profile. In addition, use of low-profile equipment instead of high-profile equipment, would be preferable.
2. Noise Impacts--It should be kept in mind that while many of the drill sites have been proposed for seemingly unoccupied areas, frequently either isolated houses or residential areas might actually be in relatively close proximity when viewed from the way that noise can travel in certain atmospheric and temperature conditions. Therefore, it is requested that consideration be given to providing noise attenuation devices that are sufficient to prevent disturbance of daytime or nighttime activities in nearby residences.

November 21, 1986

3. Dust and Particulate Impacts--Any increase of particulate matter in the atmosphere is of concern not only for public health reasons, but because of potentially negative impacts on adjacent crops. Therefore, it is hereby requested that all unpaved service roads, as well as the drill site area, be kept damp or that the use of chemical dust binders be required.
4. Odor--All reasonable steps should be taken to ensure that odors associated with either exploratory drilling or production cannot be detected beyond the actual permitted site boundary.
5. Site Size and Permitting--It is requested that only the site size actually needed be permitted and that separate permits be utilized for the exploratory drilling phase and, subsequently, for the production phase.
6. On-site Power Generation--Given that Ventura County has been designated by the EPA as a non-attainment area for ozone, it is thereby necessary to take every possible opportunity to reduce NO_x emissions from internal combustion (IC) engine generators. This can best be accomplished by requiring the use of grid power to drive the drilling rig if it is available within close proximity (i.e., one quarter mile). If grid power cannot be used because of the distance factor then it should be required that the IC engine generator be adjusted and operated in a manner that will produce the lowest practical emissions (LPE's).
7. Controlling Other Emissions Sources--To the extent feasible, the tanks used to support exploratory drilling operations should have vapor recovery systems and the utmost should be done to control other sources of fugitive emissions.

After you have reviewed the above, please give consideration to whether your agency's current oil development standards include all of the above requirements. If they do not, I would like to ask that consideration be given to amending the standards, or as an alternate that consideration be given to developing a more specific set of standards for the Oxnard Plain.

Very truly yours,


Matthew G. Magglo
City Planner

MGW:RJS:jly

cc: Tom Berg
David Mora
Richard Magglo

LU05-0086 Site Plan Naumann Drillsite As-Is (7-2014)

VENTURA COUNTY
PLANNING DIVISION
CERTIFICATION OF APPROVAL

Permit No. PLU-0103

Exhibit No. _____

Date Approved 4/3/12

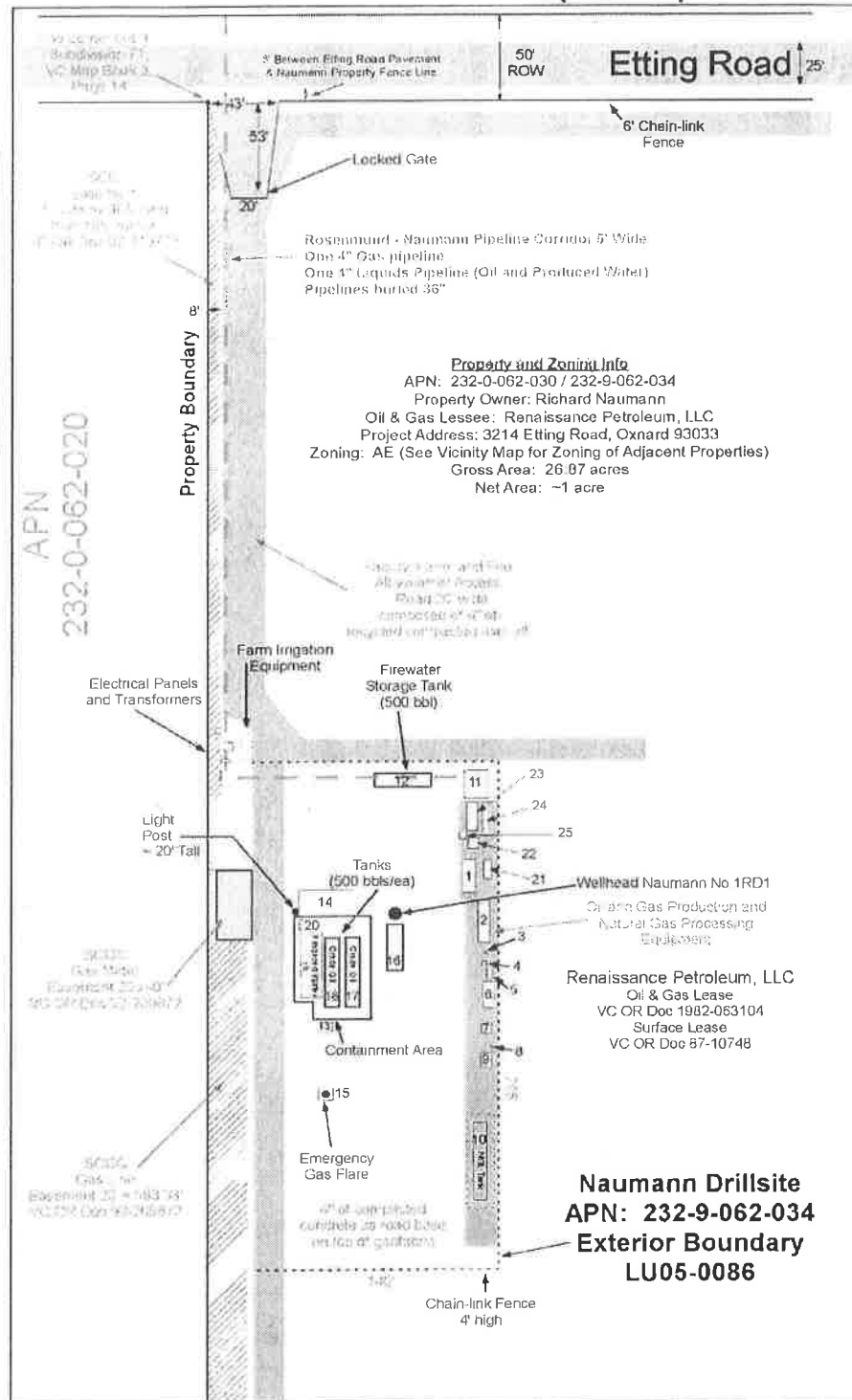
Approval Body ☒ PD
☐ PC
☐ BOS

M. Haddad 4/3/12
Authorized Signature Date

Naumann Drillsite Equipment Inventory*

1. Gas Compressor
2. Gas Chiller
3. Inlet Gas Scrubber
4. Vertical Separator
5. Total Flow Gas Meter
6. 3 Phase Separator
7. Flare Scrubber
8. Flare Meter
9. Air Compressor
10. NGL Tank
11. Pipeline Connections
12. Fire Water Tank
13. Vapor Recovery
14. LACT Skid
15. Emergency Gas Flare
16. Pumping Unit
17. Crude Oil Tank
18. Crude Oil Tank
19. Produced Water Tank
20. Loading Rack
21. Refrigeration Unit Skid
22. Glycol Contactor
23. Glycol Burner
24. Glycol Condenser
25. VSD Electrical Panels

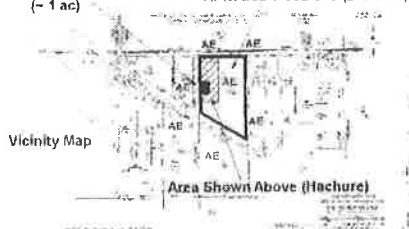
* See addendum to VC
Minor Mod dated
7-24-2014 for additional
information



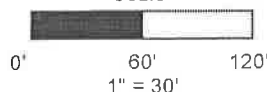
Naumann Drillsite
APN: 232-9-062-034
Exterior Boundary
LU05-0086

Naumann Drillsite:
(APN: 232-9-062-034)
(~ 1 ac)

APN: 232-0-062-030 (26.87 ac)



Scale



Renaissance Petroleum, LLC
Ventura County, CA
CUP LU05-0086
Naumann Drillsite
Site Plan "As-Is" 7-2014
rev. 1-2017

Prepared By:
Renaissance Petroleum, LLC
PO Box 20456
Bakersfield, CA 93390
661-324-9901

**LU05-0086 Site Plan
Naumann Drillsite "To-Be" (7-2014)**

**VENTURA COUNTY
PLANNING DIVISION**

CERTIFICATION OF APPROVAL

Permit No. PLM-0103

Exhibit No. _____

Date Approved 4/3/17

Approval Body

<input checked="" type="checkbox"/> PD
<input type="checkbox"/> PC
<input type="checkbox"/> BOS

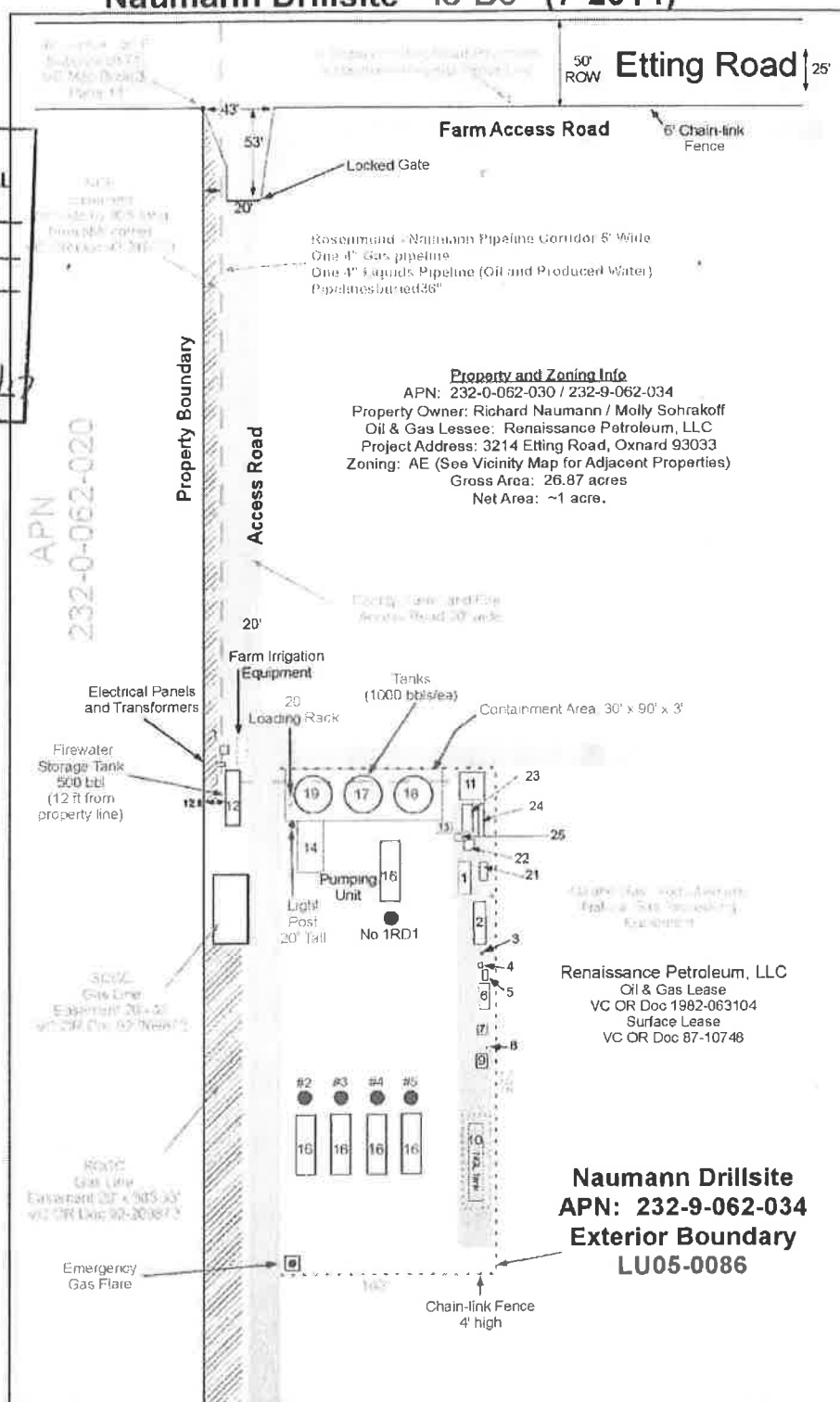
M. M... ..

Authorized Signature Date 4/3/17

Naumann Drillsite Equipment Inventory*

1. Gas Compressor
2. Gas Chiller
3. Inlet Gas Scrubber
4. Vertical Separator
5. Total Flow Gas Meter
6. 3 Phase Separator.
7. Flare Scrubber
8. Flare Meter
9. Air Compressor
10. NGL Tank
11. Pipeline Connections
12. Fire Water Tank
13. Vapor Recovery
14. LACT Skid
15. Emergency Gas Flare
16. Pumping Unit
17. Crude Oil Tank
18. Crude Oil Tank
19. Produced Water Tank
20. Loading Rack
21. Refrigeration Unit Skid
22. Glycol Contactlor
23. Glycol Burner
24. Glycol Condenser
25. VSD Electrical Panels

* See addendum to VC
Minor Mod dated
7-24-2014 for additional
information

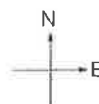


Naumann Drillsite:
(APN: 232-9-062-034)
(~ 1 ac)

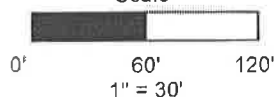
APN: 232-0-062-030 (26.87 ac)



Engineer: MWT ver 7-2014



Scale



**Renaissance Petroleum, LLC
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CUP LU05-0086
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PO Box 20456
Bakersfield, CA 93390
681-324-9901

Baca, Brian

From: Maureen Carson <maureen.t.carson@gmail.com>
Sent: Tuesday, February 21, 2017 3:00 PM
To: Hood, Monica; Baca, Brian
Cc: Marc Traut
Subject: PL-14-0103, Renaissance Petroleum Hearing

Brian and Monica,

Thanks for returning my call this morning, Monica. I'm following up to confirm our conversation regarding the draft conditions of approval, published last week with the staff report for the February 23 hearing:

1. I requested a minor typo level correction to replace the term "plot plan" with "site plan" within condition #36, to provide internal consistency within this and other conditions of approval.
2. Regarding condition #36, Brian and I discussed what documentation is intended to meet this condition. We are both in agreement on what is intended. However, I believe that some additional language is necessary to eliminate the potential for any future confusion or misinterpretation. As discussed with Monica, I am requesting that the Requirement and/or Documentation paragraph include this additional sentence: "FOR PURPOSES OF THIS CONDITION, ANCILLARY PIPELINES ARE PIPELINES AND FLOWLINES CONNECTING A WELL TO TANKS OR PRODUCTION FACILITIES." Alternatively, this could be clarified by referring to an already existing definition of ancillary pipelines, if you can identify one that exists in another reference document. I searched, but can not locate one. I'm happy to discuss if there are any questions.
3. I understand from Monica that conditions #59 and #60 reflect language recently amended and submitted by the Agricultural Commissioner's office. I understand that this agency is only recently providing input on new land use permits. Both conditions contain "one size fits all" language that RenPet believes is not appropriate to this particular permit. Brian, I would appreciate a call from you or Kim regarding these conditions so that I can better understand the background prior to commenting at the hearing.

A-1
A-2
A-3

Thank you both for your work in getting this permit ready for the hearing.

Maureen Carson
maureen.t.carson@gmail.com
530.400.6315

Renaissance Petroleum, LLC

P.O. Box 20456
Bakersfield, CA 93390-0456
Phone 661-324-9901 Fax 661-324-9902

February 23, 2017

Mr. Brian Baca
Manager, Commercial and Industrial Permits Section
Ventura County Planning Division
800 South Victoria Ave, L#1740
Ventura, CA 93009

**Re: Naumann Drillsite CUP Minor Modification PL14-0103
(Draft Conditions from Agricultural Commissioner)**

Dear Mr. Baca,

This letter is in reference to the draft conditions of approval under consideration at today's Planning Director public hearing for the above referenced permit. I am requesting the reconsideration of two conditions proposed by the Agricultural Commissioner. I want to preface our comments by stating that Renaissance Petroleum has good relationships with our agricultural neighbors; we have had zero conflicts in the past and we intend to continue to be good neighbors.

Condition 59, Notification to Agricultural Owners and Operators.

While the condition may be well intentioned, it is not appropriate for this land use permit. For example, a land use permit for an event venue with planned gatherings of persons would have potential to be impacted by adjoining agricultural operations, and vice versa. The subject land use permit is for an existing producing drill site, with a 24-hour operation, seven days per week, 365 days per year. Trucking occurs daily to and from the site and field personnel are at the site on a daily basis and are also on call for unscheduled visits. This will remain unchanged during the 30-year term of this permit per the project description. Informing adjoining agricultural operators annually that operations on the drill site will continue 24 hours per day, as permitted under the CUP, provides no useful information to the agricultural operators. Furthermore, the hours of operation have been fully disclosed during the publicly noticed CUP process. We request removal of this condition.

B-1

Condition 60, Additional Dust Control.

This condition is duplicative of provisions in Ventura County Code Section 8107-5.6.6 as implemented in Condition 26. Condition 26 includes requirements that the one-acre drill site be treated and maintained to prevent emanation of dust. Should there be complaints regarding dust, Condition 18 sets forth a process for resolution of complaints from any party, and it is confusing and unnecessary to have a different and conflicting complaint process. We request the removal of this condition.

B-2

Thank you for your consideration. If you have any questions, please contact Maureen Carson at (530) 400-6315.

Sincerely,

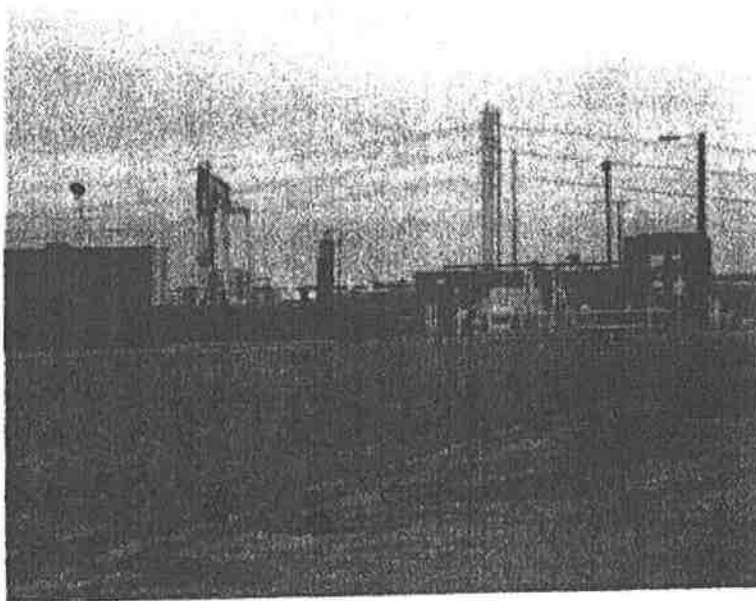
Marc Wade Traut

Copy: Monica Hood, Case Planner
Kim Prillhart, Planning Director
Henry Gonzales, Agricultural Commissioner

Oil & Gas Exploration – Exploration Management – New Business Development



Neumann Drill Site Lease Report



PG Box 114 • Ojai, CA 93024 • 805 727-1393 • ed@cfrog.org • www.cfrog.org

CFROG is a 501(c)(3) tax-exempt organization

1. Segmentation:

Summary: CFROG contends the processing of this application as is, segments the full and true project, thus violating the California Environmental Quality Act (CEQA) – since two drill sites are connected by a pipeline, trucks, have the same operator and are in the same area the project assessment should include the increase in activity that will occur at the Rosenmund drill site and Naumann site as it becomes the "hub" for the Cabrillo Oil Field. Projected expansion of the Cabrillo Oil Field should be part of any impact analysis.

The original Conditional Use Permit (CUP) application for the Naumann Drill Site was under a different operator. At that time the permit was issued for one exploratory well and all fluids were trucked from the site. Then Renaissance Petroleum acquired both the Rosenmund and Naumann drill sites and received permission to send oil in a one mile four-inch diameter pipeline to the offsite loading facility. That act made the two drill sites one project under the California Environmental Quality Act (CEQA).

The current application seeks to send all fluids from Rosenmund to Naumann and/or send produced water from Naumann to Rosenmund. An increase in activity at one drill site, results in an increase in activity at the other drill site – thus influencing the potential for environmental impacts from the oil and gas operations. The sites are linked by pipeline, trucks, operator and activity. The potential impacts at both sites have not been properly assessed together as required by CEQA.

2. Approval Removes All Restrictions on Trucking Hours:

Summary: If this permit is approved oil tanker trucks will be allowed to enter and exit the facility at all hours of the day 365 days a year, for the next 30 years (life of the permit). CFROG objects to this total lack of restriction for trucks that will pass by a residential neighborhood

Photo: Feb. 16, 2017 – entrance to Oxnard Pacific Mobile Estates.



If approved, this permit will allow oil tanker trucks to enter and exit the Etting Road facility 24 hours a day – 365 days a year. The oil tanker trucks will be passing within a dozen feet of open trailer windows during warm weather and summer nights. There are hundreds of residents who will be affected by the noise, pollution, diesel emissions, and squeaking brakes.

The application and the staff report state the reason this extension of hours is

appropriate is that the production facility is not near a residential area and thus the trucks will not affect any nearby residents. How can that be, since a map clearly show the mobile home park, Oxnard Pacific Mobile Estates, is located about 500 feet from the drill site. Was this simply an oversight? But the residential area is mentioned in the staff report, but any impact is dismissed.

Why so many trucks? The following condition appears in most oil and gas permits in Ventura County:
"Except under emergency conditions, no more than two equivalent round trip tanker trips per day shall

C-1

C-2

be permitted to haul oil and waste products from an area under an oil permit through residential streets unless the planning director authorizes additional trips."

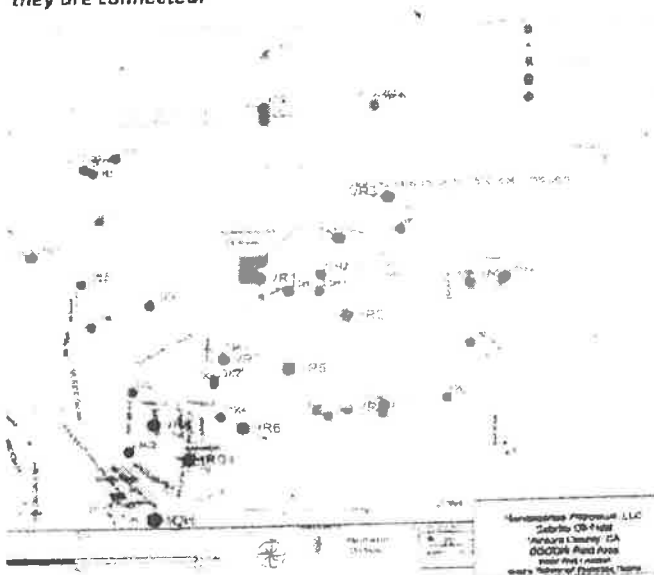
This permit allows 20 truck trips or 10 round trip tanker trips on Dodge Road. Dodge Road is a small residential road just 500' from the drill pad and is the main route to Highway 1 or Oxnard from the drill pad on Etting Road. Why is this permit getting different permission related to truck traffic? It would seem, if consistency across the industry were the goal, this permit would include such a provision and then in order to allow so many trucks on this residential road Planning Director would need to declare an emergency situation in order to allow it.

C-2

3. Cumulative Impacts – Naumann Drill Site as the "Cabrillo Oil Field Hub"

Summary: The environmental document – Mitigated Negative Declaration is inadequate because a full Environmental Impact Report is required due to the potential cumulative impacts by the Naumann Drill Site becoming the "hub" of the entire Cabrillo Oil Field

Have the cumulative impacts of the Rosenmund Injection Field (Image Below) been considered in this project? The increases in activity that will occur at Rosenmund will impact the Naumann Drill Site – they are connected.



The California Environmental Protection Agency (CALEPA) adopted the following working definition of cumulative impacts in 2005: "Cumulative impacts means exposures, public health or environmental effects from the combined emissions and discharges, in a geographic area, including environmental pollution from all sources, whether single or multi-media, routinely, accidentally, or otherwise released. Impacts will take into account sensitive populations and socioeconomic factors, where applicable and to the extent data are available." (CalEnviroScreen.) In the case of this MND, data on the very community that will be

C-3

most impacted by truck traffic and emissions is readily available and up-to-date. This data must be used to evaluate the cumulative impacts of increased pollutants, truck traffic, noise, and 24 hours a day, 365 days a year impacts.

Understanding the health and safety issues associated with the residents surrounding this drill pad, the MND should become an EIR to fully evaluate the impacts of drilling four new oil wells, producing four wells, the potential for five injection wells and associated trucking.

CUP 5252 the Rosenmund facility currently has eight oil wells, but the permit allows more to be drilled. The cumulative effects of all wells at the two drill sites which are less than one mile apart on nearby residential communities have not been evaluated. This is yet another instance of piece-meal approval of projects by the same operator in the same area that are not reviewed in a cumulative setting for CEQA compliance.

The permit states, "The authorized Naumann Drill site serves as the hub for operations of the Cabrillo Oil Field. The authorized oil and gas facility currently includes two 4" gathering pipelines owned and operated by Renaissance Petroleum, LLC. The two gathering pipelines connect the Naumann Drill site to the oil and gas facilities designated as Rosenmund Drill site, authorized by CUP 5252. The Rosenmund Drill site is located at 2797 East Pleasant Valley Road. Oil, gas and water produced at the Rosenmund Drill site are conveyed by gathering pipelines to processing and storage facilities on the Naumann Drill site in compliance with Section 8107- 5.5-7 of the Ventura County Non-Coastal Zoning Ordinance. The gathering pipelines are regulated and administered by DOGGR."

First, there is no authorization or environmental assessment of the use of the Naumann Drill site as the "hub for operations in the Cabrillo Oil Field." The permit goes on to say that this was authorized by CUP 5252. However, CUP 5252 does not authorize the Naumann drill site as the hub because that CUP does not govern the Naumann Drill Site, nor does CUP 4385 (for Naumann) govern Rosenmund. One CUP cannot authorize the use of another CUP a mile away. This statement that the Naumann drill pad has suddenly become the hub for the Cabrillo Oil Field is alarming considering that DOGGR records indicate that the Cabrillo Oil Field total oil production for 2015 was 22,714 bbls of oil, 34,690 bbls of produced water, and 64,118 cfm of gas. Those same records show four current operators in the field, Renaissance, Oryx Energy, Chevron USA, and Decalta International Corporation. The 2015 total production of oil for the Naumann drill site was 4913 bbl. of oil.

This is exactly the slippery slope that CFROG has warned against. The Naumann drill pad produces less than ¼ the total amount of oil that the Cabrillo Oil field produces before any of the 10 newly permitted wells are drilled on the Rosenmund drill pad or the four new wells authorized by this permit are drilled. If this permit is allowed as written, permission has been granted for Naumann to become a production "hub" for the entire oil field without any environmental review of that action in clear violation of CEQA.

Currently there are (at least) two 4" pipelines traveling one mile under prime agricultural land (AE) to transport separated oil from the Rosenmund drill site to the Naumann pad. At least that is what is authorized in CUP 5252. That is all that CUP 5252 authorized to be transmitted via pipeline, separated oil. CUP 5252 specifically approved the installation of "related equipment" that included separation ancillary facilities and gas processing facilities. The current MND incorrectly states that the use of the Naumann facility for processing Rosenmund production fluids was approved in CUP 5252. That is not the case, nor was it the case in the last iteration of this permit in 2010 which authorized 10 new oil wells.

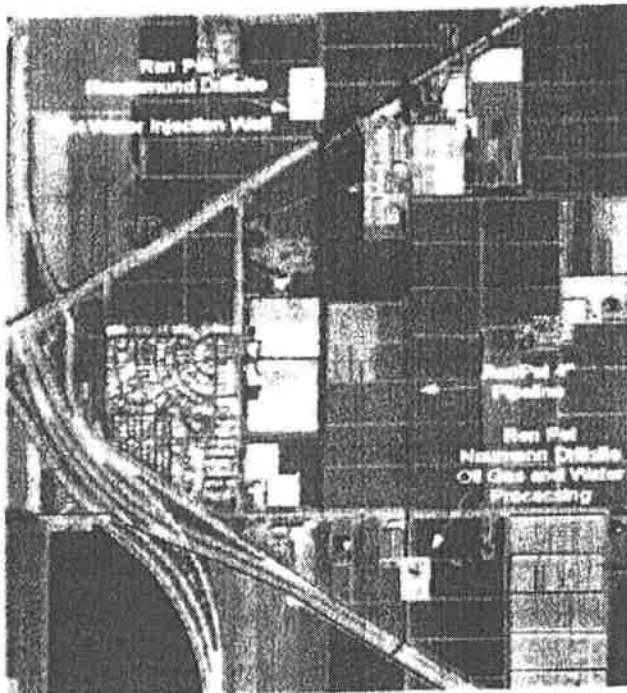
Any suggestion that the Nauman drill pad will become the "hub" of production for the Cabrillo Oil Field triggers a full Environmental Impact Report (EIR) under CEQA because it has many unknown, new,

C-3

C-4

significant environmental effects such as air pollution, traffic impacts, increased risk of spills in the AE zone, and over time, an increase in production facility size that is predictable given the scope of the production size granted by this permit.

This is also a change to the circumstances under which this project will take place requiring an EIR. The Naumann drill pad will now be the primary site for gas separation for two separate CUP's and it contains language (use of the word hub) that would permit an additional four operators in the Cabrillo Oil Field (DOGGR list of operators in Cabrillo Oil Field) to join into the production facility.



CUP 5252, superseded by LU08-0017, both permit full production facilities on the Rosenmund drill site included gas processing, oil and water separators, loading tanks, and gathering pipelines. A pipeline was authorized by that CUP permit to transport oil to the Naumann Drill pad. Condition A-5 states that any changes to the permit (such as the transport of unseparated oil, gas and produced water) or the use of the facilities must be approved by the planning director. The condition continues, "including construction of pipelines to and from the site shall be presented to the Planning Director in written and map form." There is nothing in the permit to demonstrate that this condition was met when the production facility at the Rosenmund drill pad was idled and all fluids were transported to the Naumann drill site. This permit only

allowed the transport of oil from the Rosenmund site to the Naumann site, not all production fluids. In addition, when the Rosenmund CUP was granted, it was five oil wells. In 2010, the permit was expanded to allow a total of 15 oil wells.

Neither the Rosenmund CUP (LU08-0117) nor the Naumann CUP (PL14-0103) have ever considered the cumulative effects of this piecemeal increase in the number of oil wells in any context – resulting in a violation of CEQA.

The PL14-0103 project is owned and operated by Renaissance Petroleum as is the LU08-0117 project. They are inextricably linked because as the current permit staff report states, "Naumann will serve as the hub for the Rosenmund" production processing. Therefore, these two projects must be evaluated in terms of the cumulative impacts they will collectively have on the disadvantaged community within which they will be developed.

C-4

C-5

4. Pipelines:

Summary: Prior to approval the County must require maps of all pipelines, inspection records etc. be submitted to the County and included in the impact assessment.

The gathering oil and gas pipeline that connect these two drill sites operated by Renaissance Petroleum facilities is exactly one-mile long. Most of that mile of pipeline is through prime farmland zoned Agriculture Exclusive. The permit includes a condition that requires the operator to provide a map to the RMA. Given the sensitive area through which these pipelines run, CFROG contends that the MND must include:

- Maps of all pipelines that are available to public review prior to approval of the permit.
- Records of integrity testing of all pipelines that would include the length of pipeline ACTUALLY TESTED, the age of the pipelines, the recommended maintenance schedule of the pipelines, and the replacement schedule.
- The capacity of the pipes to safely handle increased volume.
- If, as the permit states, the wastewater will be "injected into a disposal well", where will the wastewater pipeline be located and what will be the testing schedule?
- Spill/Leak contingency plans for the pipelines that include information on what type of leak detection system is in place.

This permit is an example of exactly what CFROG was concerned about regarding "facility consolidation." The production facility is being consolidated onto this permit and CUP, however, the production fluid must leave the CUP, cross prime agriculture land (AE zone) for one mile, and enter another CUP.

Currently both CUP's are owned by one oil company,
but what if the ownership of one of the CUP's changes?
Will the consolidation continue to be permitted?

5. Clarity in Definitions: Onsite, Offsite and Commercial Class II Disposal

Summary: Definitions used by staff regarding disposal wells, commercial disposal injection wells, offsite, onsite create a lack of clarity required for proper land use planning and permitting.

It is our understanding that Ventura County currently defines a commercial disposal well as an injection disposal well "that accepts produced water from offsite." The Board of Supervisors has made it clear that no commercial disposal wells will be allowed in an AE Zone. But in this project, is Rosenmund considered offsite from Naumann? The definition is unclear and should be remedied prior to approval of this permit.

Likewise, the definition of an injection well is one that takes fluids from onsite. Before this permit is issued the definition of a commercial Class II disposal well must be clarified. And the distance fluids may travel from the drill site of origin for disposal or processing before they are categorized as being disposed of "offsite" must also be clarified.

C-6

C-7

C-8

C-9

C-10

C-11

The following portions of the permit are concerning and create gaps that should be filled for proper protection of the environment and public health:

- Project Description:
 - The project description currently states "one well is currently authorized to be used for injection purposes." Is that only the existing well? The description mentions that the proposed new wells could be used for either production or injection. How many injection wells could potentially be located at this site?
- Condition 20:
 - Change of Permittee - In addition to the usual conditions regarding notice of a change of permittee, the use of this permit as production facilities from a "CUP a mile away" must immediately cease unless the production facility becomes a commercial facility.
- Condition 29:
 - Site Restoration - If one of the two CUP's becomes fully idled and/or abandoned, or if the ownership of the two CUP's is not under one operator, how will the connecting pipelines be properly maintained and/or abandoned? If the first CUP to be abandoned is to be solely responsible for the pipeline abandonment connecting the two CUP's, then the permit must include that condition as part of site restoration. It should also be made clear that the subject pipeline leaves the CUP boundaries and crosses agricultural land where no oil and gas activity takes place.
- Condition 32:
 - Drilling Noise, soundproofing materials - There are approximately 1,469 occupants of the mobile home park less than 1,800 feet from the drill pad. The design and type of sound insulation that will be used during drilling should be part of the permit conditions so that the public will understand and be able to judge if the required soundproofing will be adequate.
- Condition 33:
 - Limited drilling hours - Has it been determined if the residents in the disadvantaged community with a 59% asthma rate and 32% low birth rate will be considered an "occupied sensitive use?" If not, that should be part of the MND analysis and drilling hours should be coordinated with the appropriate needs of the community.
- Condition 60:
 - Dust Control addresses the adjacent agricultural concerns, but makes no mention of the residents within a block of the drill pad. The disadvantaged community has a score of 39% on PM2 without the additional truck traffic allowed within this permit.
- Fracking & Acidization are not prohibited and therefore would be allowed and not require a further review by Ventura County prior to obtaining the required permit from DOGGR.

C-12

C-13

C-14

C-15

C-16

C-17

C-18

February 23, 2017
Planning Director Hearing
PL14-0103

Mr. Brian Baca:

It's February 23, 2017, this is the Planning Director Public Hearing on the Renaissance Petroleum Project Case Project, that's Case # PL14-0103. My name is Brian Baca, I am the Commercial/Industrial Permits Manager for the County, the Case Planner is Monica Hood.

First, talk about the ground rules, this hearing, a decision on the project, will not be made at this hearing. Merely to accept public testimony, and complete the administrative record, that will be before the Planning Director to make a decision on the project. After this hearing is closed, and the administrative record is closed, the Planning Director has 40 days in which to make a decision to approve or deny the project.

So, we're here to gather public testimony, and I am going to have Miss Hood give a brief description of the project before us, and she has a PowerPoint presentation, and take it away Miss Hood.

Miss Monica Hood:

As Mr. Baca mentioned, I am Monica Hood, the case planner, ...

Applicant:

Maureen Carson:

My name is Maureen Carson, and I am here representing Renaissance Petroleum, I am their Land Use Consultant, also with me is Mark Trout, President of Renaissance and he also has other staff available here to help answer any questions that may come up. I want to follow-up regarding the letter that I submitted this morning, regarding Conditions 59 and 60, and want to clarify the operation of the drill site, we do not have personnel there on a 24/7 basis, so there's not somebody out there constantly during every 24-hour period during the year, however at any time someone doing field operations may be on-site, usually for short durations of time. I wanted to clarify that so that was not misinterpreted. Also, in regards to the conditions, except for our comments regarding 59 and 60 which we believe we are asking for consideration for deletion because of the comments in the letter that I submitted we're in full agreement with the conditions.

TIA-1

Mr. Trout:

No, I'm going to leave that with Ms. Carson.

Public Testimony:

Kimberly Rivers:

So for the record I am Kimberly Rivers, Executive Director of CFROG and I am going to summarize the points in our written testimony we submitted. CFROG contends that the processing of application as is segments the full and true project under CEQA we have concerns about the connection between Rosenmund and Naumann and even in the staff report today it was mentioned that the products that are extracted from Rosenmund will be transported and stored at Naumann, that's linking the projects and they have the same operator we believe that the project assessment should include the increase and activity that will occur at the Rosenmund drill site and the Naumann site as it becomes the hub for the Cabrillo Oil Field as stated in the application and the staff report and any projected expansion of the Cabrillo Oil Field should be part of any Impact Analysis for the project.

TB-1

Our second point of concern is that approving this project removes all restrictions on truck hours. We don't understand the reason for 24-hours a day 365-days a year and there is a residential community less than 500 feet away and we have concerns about the impact of those trucks running on Etting Road right by that mobile home park. The air emissions from the trucks, dusty roads, and also the additional truck trips that will be allowed by the approved permit, the impact on that residential neighborhood.

TB-2

Third, cumulative impacts again this ties into it becoming the hub of the Cabrillo Oil Field we haven't seen adequate assessment of potential expansion at Cabrillo Oil Field at Rosenmund and how that may impact this drill site in the future and under CEQA that needs to be included in any Impact Analysis. The pipelines, so this ties into comments we made to the County before about the gathering pipelines and we are pleased to see the map of the current gathering pipelines we would like to suggest if possible if the operator is able to provide a map plan of new gathering pipelines that would be going in so that can be in the record and if inspection records of the current gathering pipelines are readily available if that could be made part of the record for the County to understand the state of those pipelines in order to protect public health and safety. We also have concerns about some definitions we understand that the County defines commercial disposal injection wells as off-site, commercial disposal well as an injection disposal well that accepts produced water from off-site and there might need to be some clarification on that. We understand that this operator is not going to be accepting waste from other operators should they choose to, and we understand that they have permission for at least one injection well on this site and that injection is a possibility for the proposed new wells. In our view seems to be some lack of clarity on that definition, and if our comments on that aren't clear, I'd be happy to answer any questions.

TB-3

Just some other points of clarification, the project description states one well is currently authorized to be used for injection purposes, is that the one existing well or is that one well on-site or could all 4 of the new proposed wells be used for injection meaning could there potentially be 5 injection wells at that site so that would be some clarity that would be helpful.

TB-4

Condition 20 in addition to the usual conditions regarding Notice of Change of Permittee the use of this permit as a production facility from a CUP a mile away must immediately cease unless the production facility becomes a commercial facility. So if Rosenmund were to become operated by a different operator would that then mean that Naumann now becomes commercial because it's receiving product from that drill site different operators.

TB-5

Condition 29 Site Restoration again if one of these sites Rosenmund or Naumann becomes fully idled or abandoned or if the ownership is not under one operator how will the connecting pipelines be properly maintained and or abandoned if the first CUP to be abandoned if that should happen during the life of the CUP who would be responsible for the abandonment of the pipelines connecting the two CUPs we

TB-6

would like to see something like that included as a condition as part of site restoration and we also feel it should be made clear that the such subject pipelines leave the CUP boundaries and cross agricultural land are no oil and gas activity takes place.

TB-6

Condition 32 there's several hundred residents at the mobile home park that are a few hundred feet away it's around 500 feet away from the drill pad we're concerned about drilling noise if there is some kind of temporary sound insulation or if there's been impact studies on that community regarding drilling rights.

TB-7

Condition 33 Limited Drilling Hours has it been determined if the residents in the community with asthma rates low birth rates will be considered as Occupied Sensitive Use if not that should be part of the MND analysis and drilling hours should be coordinated with the appropriate needs of the community.

TB-8

Condition 60 Dust Control I know they mentioned Condition 60 addresses the adjacent agricultural concerns but makes no mention of the residents within a block of the drill pad. We're concerned about impacts from dust on that community and then we understand that fracking acid stimulation are not prohibited and therefore could be allowed and not required for the review and we feel that should be called out in the permit and impacts from that potential enhanced oil extraction use that should be part of the analysis.

TB-9

TB-10

I'm done.

Applicant:

Maureen Carson:

I am assuming that staff may have some comments on some of these answers and I mean we're happy to help to provide any information answering any of these questions.

Renaissance Petroleum Project, PL14-0103

Response to Public Comments Received at the February 23, 2017 Planning Director Hearing

The Planning Director hearing to consider the request of Renaissance Petroleum that a modified Conditional Use Permit (CUP) be granted to authorize the expansion and continued operation of the existing oil and gas facility on the Naumann Lease (Case No. PL14-0103) was held on February 23, 2017. The purpose of the hearing was to allow members of the public to provide comments for the consideration of the Planning Director in making a decision on the proposed project. Table 1 lists the form and source of the written and oral testimony presented at the hearing.

Table 1: List of commenters at the February 23, 2017 hearing

Reference #	Date	Type of Testimony	Author/Presenter
A	2-21-17	Email	Maureen Carson
B	2-23-17	Letter	Marc W. Traut
C	2-23-17	Letter/report	Kimberly Rivers (CFROG)
TA	2-23-17	Oral	Maureen Carson
TB	2-23-17	Oral	Kimberly Rivers (CFROG)

Marked copies of the written correspondence and a transcript of the testimony presented at the February 23, 2017 hearing are attached and numbered in correspondence with the responses to comment provided in Table 2 below.

Table 2: Public comments and Planning Division staff responses

Comment #	Comment topic	County Response
A. February 21, 2017 email by Maureen Carson		
A-1	Suggested language clarification to consistently use the term "site plan" in condition of approval No. 36.	The suggested change has been made in Condition of Approval No. 36.
A-2	It is requested that language be added to condition of approval No. 36 to better define the term "ancillary pipelines."	The following language has been added to condition of approval No. 36: <i>"For purposes of the condition, ancillary pipelines are pipelines and flowlines connecting a well to tanks or production facilities."</i>
A-3	The applicant requested a call from Planning staff to	As no change was requested, no response is required.

	better understand conditions of approval Nos. 59 and 60.	
B. February 23, 2017 letter by Marc W. Traut		
B-1	It is requested that condition of approval No. 59 (Notification to Agricultural Owners and Operators) not be imposed on the project as it is not appropriate for an oil and gas operation.	<p>The condition will remain but the following additional text has been added to the Purpose section of the condition.</p> <ul style="list-style-type: none"> • <i>Communication is necessary between the two parties to avoid potential conflicts with pesticide applications.</i> <p>Additionally, the Requirement section now includes "and maintain" in the statement.</p>
B-2	It is requested that condition of approval No. 60 (Additional Dust Control) not be imposed on the project as it is duplicative of other conditions of approval.	<p>The condition will remain but the following additional text has been added to the Purpose section of the condition.</p> <ul style="list-style-type: none"> • <i>Dust is harmful to agricultural resources as particulates can contaminate crops, spread disease and disrupt photosynthesis in plants.</i>
C. February 23, 2017 letter/report by Kimberly Rivers (CFROG)		
C-1	The commenter asserts that the processing of the current application constitutes "segmentation" of a project in violation of CEQA because the project site is connected by pipeline to another oil facility.	<p>The Naumann Lease currently authorized by CUP LU05-0086 is connected by pipeline to the Rosenmund Lease facilities authorized by CUP LU08-0117. Fluids produced at the Rosenmund site are conveyed to consolidated storage and processing facilities on the Naumann site. Wastewater produced at the Naumann site may be conveyed to the Rosenmund site for injection. This is a normal and ongoing circumstance that is encouraged by County ordinance. Section 8107-5.5.4 of the Non-Coastal Zoning Ordinance states:</p> <p><i>"Permittees and operators should share facilities such as, but not limited to, permit areas, drill sites, access roads, storage, production and processing facilities and pipelines."</i></p>

		<p>The use of consolidated storage and processing facilities does not combine the Naumann and Rosenmund facilities into a single project for environmental review under CEQA or require that the facilities be subject to a single CUP. In any case, no changes in the activities currently permitted at the Rosenmund site have been proposed.</p>
C-2	<p>The commenter objects to the total lack of restrictions for trucks that will pass by a residential neighborhood.</p>	<p>The Oxnard Pacific Mobile Estates is located about 1,700 feet (rather than 500 feet) west of the Naumann drill site. Trucks travelling to and from the Naumann site could opt to drive on Dodge Road to reach Pleasant Valley Road and State Highway 1. There is an existing, permitted agricultural trucking company yard (CUP 4975) located at the southern end of Dodge Road (adjacent to the Etting Road intersection). Large trucks from this facility likely currently use Dodge Road to access Pleasant Valley Road and Highway 1. Although the number of one-way truck trips per day (20) associated with the proposed project is comparatively small, the truck traffic could incrementally increase road noise adjacent to this sensitive use, if this route was used. However, alternative routes are available to reach State Highway 1, Highway 101 and roads included in the Regional Road Network. Some routes are more direct than the use of Dodge Road. In any event, condition of approval No. 1 has been augmented to include the following truck route and operational restrictions such that the project would not contribute to existing truck traffic volume on Dodge Road:</p> <ul style="list-style-type: none"> • <i>All produced fluid tanker trucks associated with the proposed project shall exclusively use the segment of Etting Road located east of the Naumann Lease facility to connect to roads included in the</i>

		<p><i>County Regional Road Network. Project-related tanker trucks shall not travel on Dodge Road or the portion of Etting Road located west of the Naumann Lease facility site.</i></p> <ul style="list-style-type: none"> <i>A maximum of 3 truckloads of produced fluid shall be exported from the Naumann Lease site in any one hour.</i> <p>With the above provisions, the concerns regarding truck traffic on Dodge Road near the existing mobile home park are adequately addressed.</p>
C-3	<p>The commenter states that the "Mitigated Negative Declaration is inadequate because a full Environmental Impact Report is required due to the potential cumulative impacts by the Naumann Drill Site becoming the 'hub' of the entire Cabrillo Oil Field."</p>	<p>The Mitigated Negative Declaration (MND) in question was adopted by the County in 1986 for the subject oil and gas facility. The circumstances under which an EIR or subsequent MND are required for the current proposal are set forth in Section 15162 of the CEQA Guidelines. These circumstances are evaluated in the proposed Addendum to the MND. No substantial evidence has been identified that warrants the preparation of an EIR or subsequent MND. The comments largely provide information on other existing permitted facilities that constitute the CEQA baseline condition or existing setting from which the impacts of proposed new activities are assessed. The comments do not identify any cumulatively significant effects to which the proposed project would make a considerable contribution.</p> <p>The description of the Naumann Drill Site as the "hub" of the Cabrillo Oil Field refers to the two permitted facilities (Rosenmund and Naumann) operated by the applicant and the fact that they are the only currently active facilities in the Cabrillo Oil Field. The 2015 production volumes included in the comment were</p>

		<p>entirely from the Rosenmund and Naumann leases.</p> <p>The term "hub" does not have any meaning under the Non-Coastal Zoning Ordinance and does not imply or authorize any facility expansion or additional connections to other oil field facilities owned by other companies. Each permitted oil and gas facility will continue to be operated under the applicable conditional use permit until that permit is modified. There are no applications under review by the County to convey produced fluid from other non-Renaissance oil field facilities by pipeline or trucking to the Naumann Lease site.</p> <p>The commenter mentions the new wells authorized to be drilled at the Rosenmund Lease drill site. The potential environmental impacts of the installation of these wells was reviewed in 2010 at the time modified CUP LU08-0117 was granted. No changes in the authorized Rosenmund facilities are proposed or under review by the County.</p>
C-4	<p>The pipelines that connect the Rosenmund Lease facilities to the Naumann Lease facilities is discussed in this comment. It is asserted that the only fluid that can be conveyed by pipeline from the Rosenmund Lease to the Naumann Lease facilities is "separated oil." The comment further states that "the current MND incorrectly states that the use of the Naumann facility for processing Rosenmund production fluids was approved in CUP 5252."</p>	<p>The current MND Addendum includes the following statements:</p> <p><i>"The two gathering pipelines connect the Naumann Drillsite to the oil and gas facilities designated as the Rosenmund Drillsite, authorized by CUP 5252."</i></p> <p><i>"Oil, gas and water produced at the Rosenmund Drillsite are conveyed by gathering pipelines to processing and storage facilities on the Naumann Drillsite in compliance with Section 8107-5.5.7 of the Ventura County Non-Coastal Zoning Ordinance."</i></p> <p>The Rosenmund Lease facilities operate under the authority of CUP LU08-0117 (a modification of CUP 5252). Condition of</p>

		<p>Approval No. A-1 of CUP LU08-0117 states:</p> <p><i>"The CUP also permitted onsite oil processing and production and the transportation of production products from the site. Existing structures onsite include five wells (Vivian Rosenmund Nos. 1 to 5) gas and oil pipeline connections and pipeline pigging manifolds..." [emphasis added]</i></p> <p>Condition of Approval C-4 of CUP LU08-0117 states:</p> <p><i>"...if the Planning Director determines that transport of oil, gas or waste products off-site by truck is creating traffic problems, oil and gas products shall be transported off-site by pipeline when pipeline connections are determined by the Planning Director to be available and feasible." [emphasis added]</i></p> <p>In addition, the pipelines that connect the Rosenmund facility to the Naumann facility are depicted on the approved site plan for CUP LU08-0117. Thus, the transport of "production products" (including oil, gas and water) from the site to the Naumann Lease is authorized by CUP LU08-0117. Although the installation and use of onsite tanks and other facilities is authorized at the Rosenmund facility, the consolidated facilities at the Naumann Lease have been used.</p>
C-5	<p>This comment asserts that the Rosenmund and Naumann "projects must be evaluated in terms of the cumulative impacts they will collectively have on the disadvantaged community within which they will be developed."</p>	<p>Refer to Response to Comment C-2 above regarding effects on the Oxnard Pacific Mobile Estates community.</p> <p>Refer to response to comment C-3 above regarding cumulative impacts.</p>

C-6	<p>The comment states that “prior to approval the County must require maps of all pipelines, inspection records etc. be submitted to the County and included in the impact assessment.”</p>	<p>Recommended Condition of Approval No. 36 requires the Permittee to provide a detailed site plan of all new ancillary pipelines and other facilities associated with each new well that is installed on the Naumann drillsite.</p> <p>The existing pipelines that connect the Rosenmund facility site to the Naumann site are existing permitted facilities that are not part of the current application under review by the County. The location of these pipelines is a matter of public record as indicated in the comment.</p> <p>Note that an “MND Addendum”, not an “MND”, was prepared for the current proposal. The relevant MND was previously adopted by the County.</p>
<p>C-7</p> <p>C-7</p>	<p>The following information is requested to be included in the “MND”:</p> <p>“Records of integrity testing of all pipelines...”</p> <p>“the capacity of the pipes to safely handle increased volume.”</p>	<p>As indicated in Response to Comment C-6 above, the existing permitted pipelines are not under review as part of the current application. The proposed modifications of the existing permitted Naumann Lease facility are under review. The pipelines that convey produced fluids from the Rosenmund drillsite to the Naumann facility were considered when the installation and operation of 10 new wells at the Rosenmund facility was approved with the granting of modified CUP LU08-0117 in 2010.</p> <p>Pursuant to Section 3106 of the Public Resources Code, the State Oil and Gas Supervisor (i.e. the Division of Oil and Gas and Geothermal Resources; DOGGR) is responsible for the operation and maintenance of oil field pipelines authorized by the County as a land use matter. The commenter should contact DOGGR with any questions regarding the integrity, testing or capacity of existing pipelines.</p>

C-8	<p>The following information is requested to be included in the "MND":</p> <p>"...where will the wastewater pipeline be located and what will be the testing schedule?"</p>	<p>Recommended Condition of Approval No. 36 requires the Permittee to provide a detailed site plan of all new ancillary pipelines and other facilities associated with each new well that is installed on the Naumann drillsite. This includes any well drilled for wastewater disposal purposes. Note that wastewater injection is currently authorized at the Naumann Lease facility.</p> <p>Refer to Response to Comment C-7 above regarding a "testing schedule."</p>
C-9	<p>The following information is requested to be included in the "MND":</p> <p>"Spill/Leak contingency plans for the pipelines..."</p>	<p>A Spill Prevention Control and Countermeasure Plan (SPCC) is required to be on file with the Division of Oil and Gas and Geothermal Resources (DOGGR) for each oil and gas storage facility. Refer also to Response to Comment C-7 above.</p>
C-10	<p>The comment states:</p> <p>"Currently, both CUPs are owned by one oil company, but what if the ownership of one of the CUP's changes? Will the consolidation continue to be permitted?"</p>	<p>Section 8107-5.5.4 of the Non-Coastal Zoning Ordinance (NCZO) states:</p> <p><i>"Permittees and operators should share facilities such as, but not limited to, permit areas, drill sites, access roads, storage, production and processing facilities and pipelines."</i></p> <p>As indicated above, the consolidation of facilities will continue to be permitted in accordance with the NCZO. Joint use of production facilities by multiple operators is encouraged by County ordinance in order to reduce the overall number of such facilities.</p>
C-11	<p>The commenter states that "the definition of a commercial Class II disposal well must be clarified."</p>	<p>A "commercial" Class II disposal facility accepts (for a fee) the wastewater produced from oil and gas facilities operated by other companies. For example, the Anterra Energy Services facility located east of Oxnard accepts Class II wastewater from multiple operators and disposes that water into an onsite injection well.</p>

		<p>As pointed out by the commenter, commercial Class II waste disposal facilities are not allowed in the Agricultural Exclusive (AE) zone pursuant to Section 8105-4 of the Non-Coastal Zoning Ordinance. Such a disposal facility could not be operated at either the Rosenmund or Naumann sites as both are located in the AE zone.</p> <p>Injection wells used as part of the operations of a single oil and gas company (including operations on multiple non-contiguous leases) constitute ancillary equipment that are part of permitted oil and gas facilities. The terms "onsite or "offsite" are not relevant to whether wastewater disposal operations constitute a commercial use.</p>
C-12	Project description	The project description is clear that the existing well and the proposed four new wells could be used for either production or injection.
C-13	Condition 20: Change of Permittee	Refer to Responses to Comment C-3, C-4, C-10, and C-11 above.
C-14	Condition 29: Site Restoration	The two gathering pipelines that connect the Rosenmund and Naumann drillsites were installed under the authority of CUP LU05-0086 granted in 2007. This permit was granted to authorize changes in the Naumann Lease facility and an extension of the effective period of the CUP. Thus, the pipelines are part of the permitted Naumann facility. The operator of the Naumann facility is ultimately responsible for the removal of these pipelines as part of future facility abandonment.
C-15	Condition 32: Drilling Noise, soundproofing materials	In accordance with Section 8107-5.6.16 of the Non-Coastal Zoning Ordinance, soundproofing is required for drilling operations located within 1,600 feet of an occupied sensitive use. The mobile homes at Oxnard Pacific Mobile Estates are located more than 1,600 feet from the Naumann drillsite. Thus, no soundproofing is required due to the

		<p>existence of this particular occupied sensitive use. The issue of drilling noise is adequately addressed in the NCZO as reflected in the standard conditions of approval Nos. 31, 32 and 33. Soundproofing or signed waivers will be required for other sensitive uses located closer to the subject drillsite.</p>
C-16	Condition 33: Limited drilling hours	<p>The Oxnard Pacific Mobile Estates mobile home park constitutes an occupied sensitive use. However, the park is located more than 1,600 feet from the Naumann drillsite. Pursuant to NCZO Section 8107-5.6.20, drilling hours are not restricted when a drillsite is located more than 800 feet from an occupied sensitive use. Note that limited drilling hours may be required in accordance with Condition of Approval No. 33 for other sensitive uses located closer to the Naumann drillsite.</p>
C-17	Condition 60: Dust Control	<p>It appears that the commenter is referring to the residents of the Oxnard Pacific Mobile Estates mobile home park as "residents within a block of the drill pad." This mobile home park is located more than 1,600 feet from the Naumann Drillsite. There would not be a discernible effect on the residents of the mobile home park from dust that may be generated on the 1-acre Naumann drillsite. Any dust generated on this small site would be negligible compared to the dust generated by agricultural operations on the thousands of acres of cultivated farmland in the vicinity. Refer to Response to Comment C-2 above regarding truck traffic. Additionally, Condition of Approval No. 26 and No. 57 also address dust control.</p>
C-18	Fracking and Acidization:	<p>As indicated in the application form filed with the County, the proposed project does not include hydraulic fracturing or acid well stimulation. Condition of Approval No. 1 has been clarified with the inclusion of the following language:</p>

		<p><i>Hydraulic fracturing, acid well stimulation, and other "well stimulation treatments", as defined in Public Resources Code Section 3157, are not included in the proposed project. The use of any such well stimulation treatment as part of the project would require a subsequent discretionary modification of the CUP, additional environmental review under CEQA, and a public hearing.</i></p>
TA. Testimony by Maureen Carson		
TA-1	<p>Ms. Carson represented the applicant and presented comments as a follow-up to the February 23, 2017 letter of comment. (See Responses to Comment B-1 and B-2 above.) She indicated that personnel are not at the Naumann drillsite on a 24/7 basis but could be on the site at any time of day, "usually for short durations of time."</p>	<p>Refer to Response to Comment B-1 above.</p>
TB. Testimony by Kimberly Rivers (CFROG)		
TB-1	<p>This comment expresses concern that the processing of the application segments the full and true project under CEQA in view of the common ownership and pipeline connection between the Rosenmund and Naumann leases.</p>	<p>Refer to Response to Comment C-1 above.</p>
TB-2	<p>This comment expresses concern about the impact of extended hours of trucking and increased truck traffic on a nearby mobile home park.</p>	<p>Refer to Response to Comment C-2 above.</p>
TB-3	<p>This comment expresses concerns about the cumulative impacts due to the "potential expansion at Cabrillo Oil Field at Rosenmund...".</p>	<p>Refer to Response to Comment C-3 and C-11 above.</p>

TB-4	This comment requests clarity on the wells that could be used for injection.	Refer to Response to Comment C-12 above.
TB-5	This comment references Condition of Approval 20 and expresses concern about the potential for the Naumann site becoming a "commercial facility."	Refer to Responses to Comment C-3, C-4, C-10, and C-11 above.
TB-6	This comment references Condition of Approval 29 and expresses concern about the status of the pipelines connecting the Rosenmund and Naumann facilities should one of these facilities be abandoned.	Refer to Response to Comment C-14 above.
TB-7	This comment references Condition of Approval 32 and expresses concern regarding the effects on the effect of drilling noise on the residents of a mobile home park.	Refer to Response to Comment C-15 above.
TB-8	This comment references Condition of Approval 33 and expresses concern about drilling hours and effects on residents.	Refer to Response to Comment C-16 above.
TB-9	This comment references Condition of Approval 60 and expresses concern regarding the impact of dust on local residents.	Refer to Response to Comment C-17 above.
TB-10	This comment expresses concern that fracking and acid stimulation are not prohibited.	Refer to Response to Comment C-18 above.

Attachments:

1. 2-21-17 email from Maureen Carson
2. 2-23-17 letter from Marc W. Traut
3. 2-23-17 Naumann Drill Site/Lease Report by Kimberly Rivers
4. 2-23-17 transcript of testimony presented at the Planning Director hearing