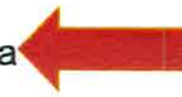


Ventura County Non-Coastal Zoning Ordinance

Pursuant to Sections 8105-4 and 8111-1.2.1.1 of the NCZO, the proposed expansion and continuation of the existing oil and gas facility project is allowed in the AE zone where the subject property is located with the granting of a CUP. In order to grant the requested CUP, the Commission must make the required findings specified in Section 8111-1.2.1.1 of the NCZO based on the whole of the record. These findings (or permit approval standards) include:

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Staff Report

1. The proposed development is consistent with the intent and provisions of the County's General Plan and of Division 8, Chapters 1 and 2, of the Ventura County Ordinance Code [Section 8111-1.2.1.1.a].
2. The proposed development is compatible with the character of surrounding, legally established development [Section 8111-1.2.1.1.b].
3. The proposed development would not be obnoxious or harmful, or impair the utility of neighboring property or uses [Section 8111-1.2.1.1.c].
4. The proposed development would not be detrimental to the public interest, health, safety, convenience, or welfare [Section 8111-1.2.1.1.d].
5. The proposed development, if allowed by a Conditional Use Permit, is compatible with existing and potential land uses in the general area where the development is to be located [Section 8111-1.2.1.1.e].
6. The proposed development will occur on a legal lot [Section 8111-1.2.1.1.f].
7. The proposed development is approved in accordance with the California Environmental Quality Act and all other applicable laws.





Naumann Drill Pad, from Etting Road.

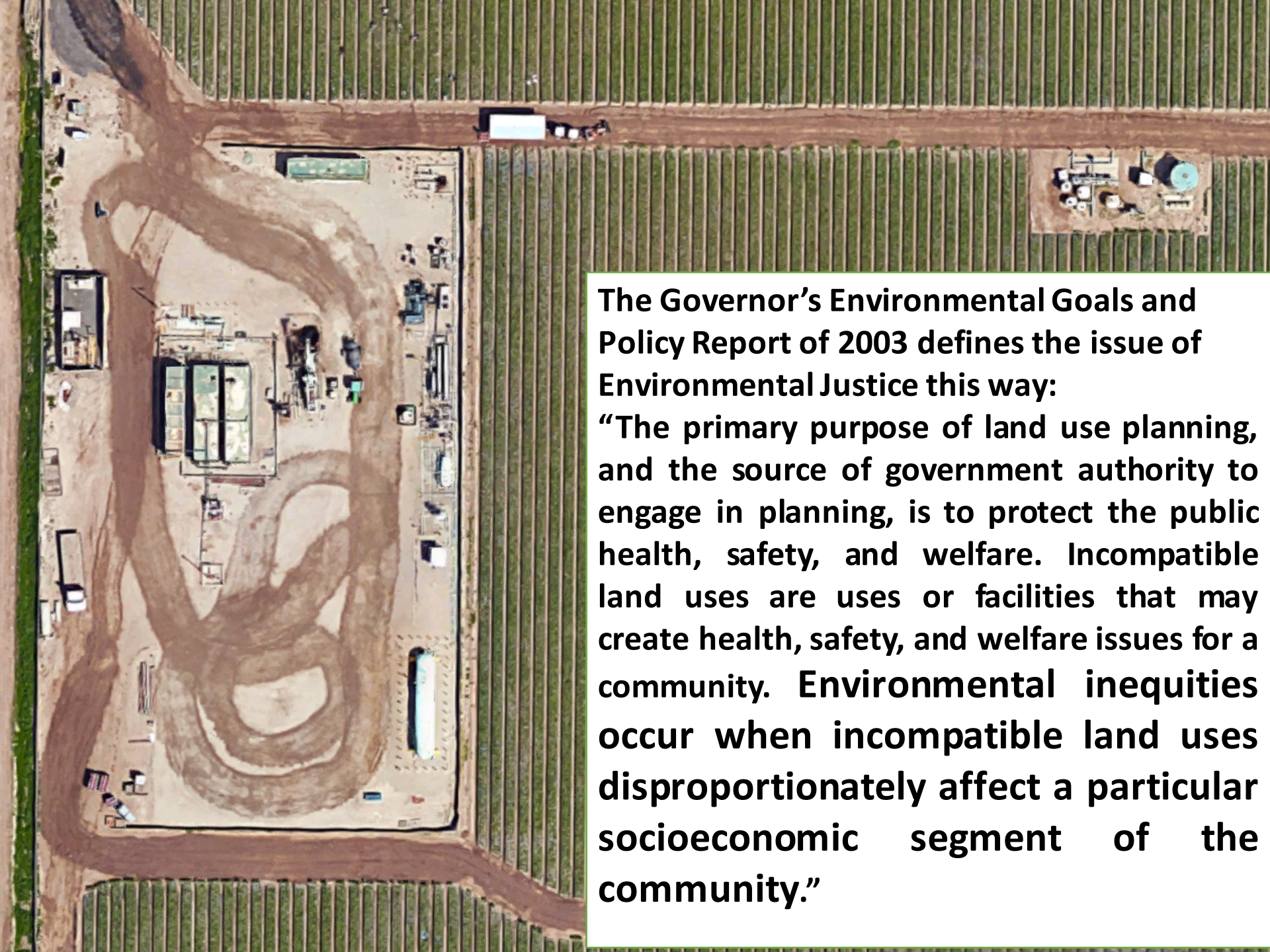
Remedy –

1. Alternative - Leave project as is, one well, facilities for one well, renewed permit. Suggest – flow monitor for continuous pilot and to track true emissions from unplanned “emergency” flaring, and perimeter monitor. Unannounced inspections when complaints received.
2. If project remains unchanged - wells added, and facility expanded to accommodate other drill pad/s –then Complete EIR that includes cumulative health impact assessment and Environmental Justice considerations related to Disadvantaged Community.

Why are we here?

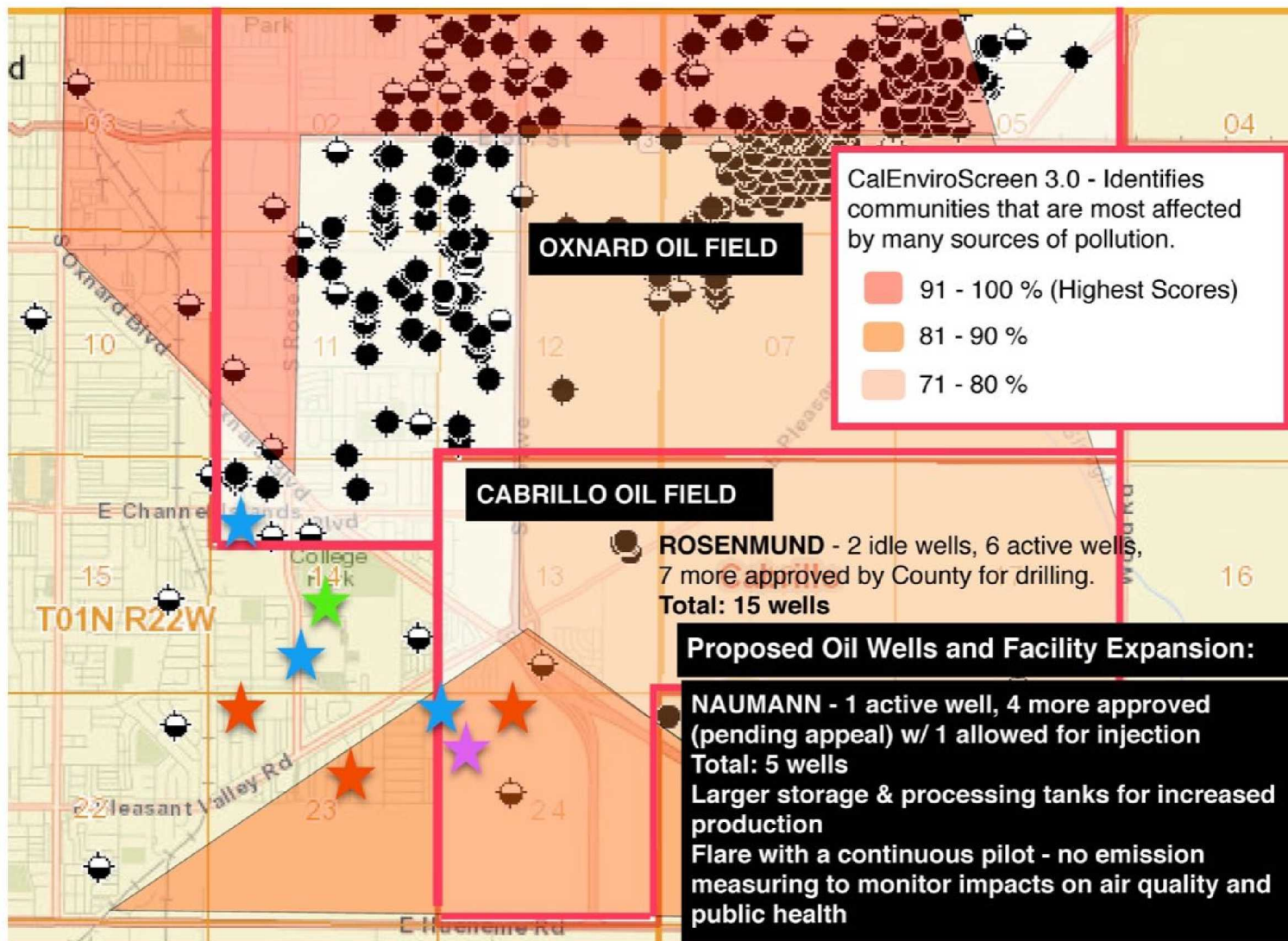


“An environmental impact report is an informational document” the purpose of which “is to provide public agencies and the public in general with detailed information about the effect which a proposed project is likely to have on the environment; ...” (Pub. Resources Code § 21061)



The Governor's Environmental Goals and Policy Report of 2003 defines the issue of Environmental Justice this way:

"The primary purpose of land use planning, and the source of government authority to engage in planning, is to protect the public health, safety, and welfare. Incompatible land uses are uses or facilities that may create health, safety, and welfare issues for a community. Environmental inequities occur when incompatible land uses disproportionately affect a particular socioeconomic segment of the community."



- Oxnard College
- Channel Islands High School, Condor High School, Ocean View Jr High School
- Fred L. Williams Elementary, Tierra Vista Elementary, Mar Vista Elementary
- Ocean View Pre-School

Basic Facts in Black and White -

- Cabrillo Oil Field named/designated by DOGGR in 2007
- Right now **20 oil wells** are approved to be drilled in the field.
 - 5 at Naumann (including PL14-0103)
 - 15 total at Rosenmund (7 not yet drilled)
- An additional 15 WERE approved by the county (Daud), but drilling timeframe expired.

The permit record tells us the county has approved 35 wells within the field. It is foreseeable that the field will expand from the current 20 wells.

Remarkably, the development of this oil field has never been cumulatively reviewed under CEQA.

**76-80% Percentile Total
91% Pollution Burden**

**55% Population Characteristics
40% Ozone**

41% PM 2.5 (airborne particulate matter)

36% Diesel

100% Pesticides*

49% Toxic Releases

32% Traffic

87% Drinking Water

39% Cleanups

68% Groundwater Threats

72% Hazardous Waste

97% Impaired Water*

68% Solid Waste

Health Consequences:

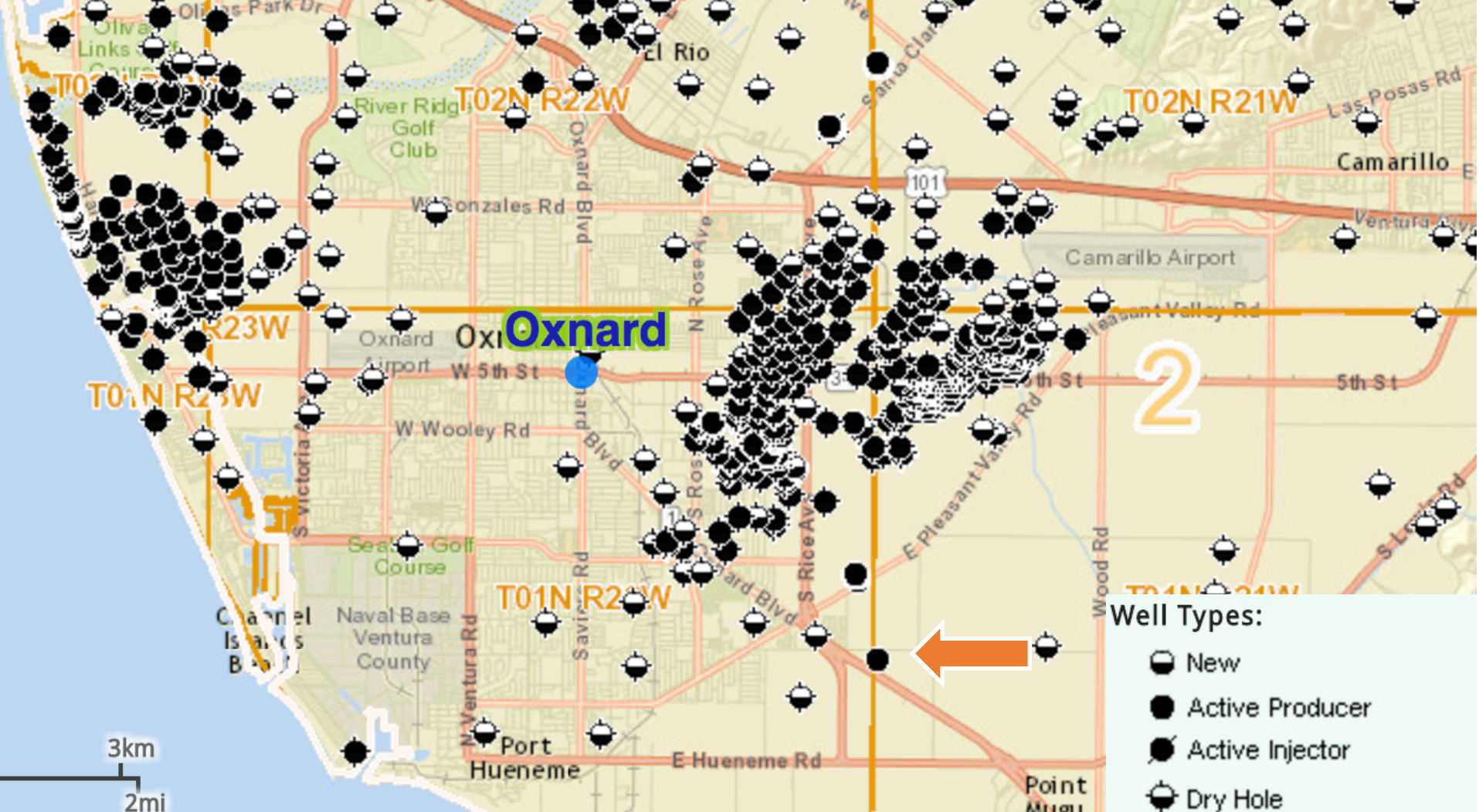
Asthma 31%

Low Birth Weight 45%

Cardiovascular Rate 28%



**Census tract 6111004704 is
a CalEnviroScreen
disadvantaged community
because it ranks in the top
25% across the state for
most pollution burden and
other factors.**



What are the cumulative impacts of the expansion of the Cabrillo Oil Field?

This project must be considered in its totality.

It is a *“mandate of CEQA that environmental considerations do not become submerged by chopping a large project into many little ones - each with a minimal potential impact on the environment - which cumulatively may have disastrous consequences.”* (Bozung vs. Local Agency Formation Com.(1975) 13 Cal.3d at 283-84.)



Rosenmund Drill Site



Why are we here?

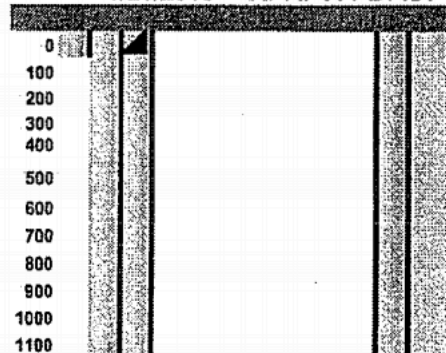
- Without complete information Ventura County agencies and public cannot know the true impacts of land use decisions - and any impacts cannot be properly mitigated.

Why are they incomplete?

- Segmentation or “piecemealing” of the project
- Lack of analysis of cumulative impacts including impacts to health.
- Lack of Environmental Justice considerations.

Is it reasonably foreseeable that newly drilled wells at Naumann (and other Cabrillo Lease sites) will be fracked?

Naumann #1 RD1
Sec 19, T 1N, 21W
1/26/2015 API # 111-21431



Drilling, Hole and Casing Info	
KB - 48.3' (22' AGL)	
GL - 26.3'	
10 3/4" , 40.5#, K-55 Casing from 1795' - Surface.	
7 5/8" , 26.4#, N-80 Casing from 4646' to Surface	
(9 7/8" Hole from 1795' - 4646')	
5" , 15# LTC Liner (P-110, N-80, K-55) from 7320' - 4318'	
(6 3/4" hole from 7320' to 4646')	

Tubing Data		
Description:	Number	Length
K.B.		
Donut & 2-7/8" Fatigue Nipple		
2-7/8" EUE Tubing		13
Capillary Tubing Mandrel		
2-7/8" E.U.E. Tubing		28

If so, what are the potential impacts?

All info readily available to county for review, lists "SilverStim" chemical – used by Halliburton in fracking -



11/15/2004 - 11/17/2004 - Tubing
3/31/2003 - 4/1/2003 - Pump

Perfs:
4/29/05: 6444' - 6429' 6 SPF.
5/2/05: 6429' - 6414' 6 SPF
5/3/05: 6414' - 6400' 6 SPF
6/13/2005: 6400' - 6444', 6850' - 6880'. 6 SPF. .5"
10/16/06: 6950' - 6850', 6680' - 6640', 6530' - 6460', 6444' - 6400' 6 SPF .32"
10/19/2006: 6850' - 6950' 6 SPF. .32"
6/21/2013: 7236' - 7211' 6 SPF. .32"

Top of Cement : 7271' (2-21-2005)
P.B.T.D = 7280'
Total Depth = 7340' (1-21-2005)

Frac Data:
Date: October 19, 2009
8300 gal of 7% KCl
675 gal of 17 cp water frac
7730 gal of 17 cp SilverStim LT
13780 gal of 17 cp SilverStimLT &
416.83 100*LB of premium sand-white - 20/4
Date: January 27, 2009
271.48 bbl water
556.7 bbl SilverStim LT
740.88 bbl SilverStim LT with 1023.67 100*LB of sand

Piecemealing Truck Trip and Flaring –

- Current info provided only includes today's average truck trips with currently active wells at Rosenmund - that is INCOMPLETE because not all approved wells at Rosenmund are currently active or drilled.
- A full review MUST include all **reasonably foreseeable wells, that Naumann would process fluid for – 20 currently approved +** other reasonably foreseeable wells. County tells us business can petition government at any time. How many wells might be drilling in the Cabrillo Oil Field if oil prices climb?

Why Rosenmund should be studied -

- Processing of oil, gas, and waste from Rosenmund to occur at Naumann
- Gas from Rosenmund either flared at Naumann or transferred to SoCalGas pipeline after processing at Naumann.
- Trucks hauling Rosenmund waste from Naumann to commercial disposal.
- More wells create additional flaring.

No review of the potential cumulative impacts from those additional trucks and additional flaring associated with increased production of all fluids from Rosenmund when idle wells reactivated and all wells are drilled.



Let the public SEE what a cumulative impact study would show!

- An EIR will not stop the project or eliminate jobs.
- An EIR is an informational document that will allow the county and the applicant to develop appropriate mitigations or alternative plans that will protect the environment and public health to the maximum extent possible.



Naumann Drill Pad, from Etting Road.

Remedy –

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