



# Appeal Form

County of Ventura • Resource Management Agency • Planning Division  
800 South Victoria Avenue, Ventura, CA 93009 • 805 654-2488 • www.vcrma.org/planning

Appeal Number: PL14-0103

To: ☒ Board of Supervisors  
☐ Planning Commission  
☐ PWA Advisory Agency

I hereby appeal the decision of the Planning Commission, which was given on  
September 7, 2017.

The decision was as follows:

Approval of project PL14-0103, Renaissance Petroleum project expanding the Cabrillo Oil Field in South Oxnard.

The grounds of appeal are (attach extra sheets as needed):

See attachment.

I request that the appropriate decision making body take the following action:

See Attachment

Name of Appellant: Citizens For Responsible Oil and Gas; CFROG; Food & Water Watch

Address of Appellant: See attachment for all contact info

Telephone Number of Appellant: CFROG 805-727-1393/ FWW 619-252-6899

County of Ventura  
Board of Supervisors Hearing  
PL14-0103  
Exhibit 20 - Appeal Form filed by CFROG and FWW, dated  
September 15, 2017

Is the appellant a party in the application? ☐ Yes ☒ No . If not, state the basis for filing the appeal as an "aggrieved person."

Co-appellants are nonprofit public organizations representing community interests.

  
\_\_\_\_\_  
Signature of Appellant

9/15/17  
\_\_\_\_\_  
Date

Appeal and deposit fee of \$ 1000 (pursuant to fee schedule specified by Resolution No. 222 of the Ventura County Board of Supervisors) received by the Planning Division at 1:22 pm (time) on 9-15, 20 17.

Kimberly L. Prillhart, Director  
Planning Division

By Nee Jones  
\_\_\_\_\_

Is the appellant a party in the application?  
"aggrieved person."

. If not, state the basis for filing the appeal as an



Signature of Appellant

9/15/17

Date

Appeal and deposit fee of \$\_\_\_\_\_ (pursuant to fee schedule specified by Resolution No. 222  
of the Ventura County Board of Supervisors) received by the Planning Division at \_\_\_\_\_ (time) on  
\_\_\_\_\_, 20\_\_\_\_\_.

Kimberly L. Prillhart, Director  
Planning Division

By \_\_\_\_\_



CFROG



September 15, 2017

Grounds of Appeal of Planning Commission Approval of PL14-0103, dated September 7, 2017 are as follows:

1. The Planning Commission used an incorrect standard of review in finding that the project does not require an environmental impact report;
2. The correct "fair argument" CEQA standard of review requires the county prepare an Environmental Impact Report for the project (*Friends of College of San Mateo v. San Mateo Community College District* (2016) 1 Cal.5<sup>th</sup> 937; *Friends of College of San Mateo v. San Mateo Community College District* (May 5, 2017) 11 Cal.App.5<sup>th</sup> 596;
3. The Environmental Impact Report should include a cumulative impact study of this project, existing development, and the foreseeable future development and expansion of the Cabrillo Oil Field.



Appeal of Ventura County Planning Commission Decision  
Approving: LU14-0103, Sept. 7, 2017- Appeal filed September 15, 2017

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**We request that the appropriate decision making body take the following action:**

Whereas there has never been a cumulative impact study of the development and expansion of the Cabrillo Oil Field and therefore impacts, including health impacts from the development of this oil field are unknown,

Whereas Ventura County has – in the past and with this project – approved a total of 35 wells to be drilled in the field, which constitutes substantial evidence that it is reasonably foreseeable that an operator may apply to drill more wells than the currently approved 20 wells,

Whereas the State of California has recently identified the residential community that is located approximately 1600 feet from the project site as a disadvantaged community, which informs us that the people who live there are already heavily burdened by pollution and other factors making them more vulnerable to potential impacts of the expansion of the Cabrillo Oil Field,

Therefore, Appellants respectfully request that the Board of Supervisors uphold the appeal and deny the project and that any further consideration of this project application shall require the Planning Division to prepare an Environmental Impact Report that adequately analyzes and mitigates all direct, indirect and cumulative impacts of the project to the nearby disadvantaged community, the general public, and the surrounding agricultural land including those impacts from; 1. The proposed change of the Rosenmund Drill pad for use as an injection well for production waste from the Naumann Drill pad; 2. The proposed change of the gathering pipeline for transporting crude oil from a total of 15 oil wells located on the Rosenmund Drill pad to the Naumann Drill pad; 3. The proposed change to the Naumann Drill pad from a processing facility for only 1 oil well to a processing facility for 19 oil wells; and 4. The approval of the Naumann Drill pad as the production facility for the entire newly developing Cabrillo Oilfield.

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**Contact Information for Co-Appellants:**

Citizens For Responsible Oil and Gas – CFROG

Contact: Kimberly Rivers, Executive Director – [ed@cfrog.org](mailto:ed@cfrog.org), 805-727-1393  
Address: Post Office Box 114, Ojai, CA 93024

Food & Water Watch

Contact: Tomas Rebecchi, Ventura County Organizer – [trebecchi@fwwatch.org](mailto:trebecchi@fwwatch.org), 619-252-6899  
Address: 940 E. Santa Clara Street, Unit 202, Ventura, CA 93001 (starting April 24)



CFROG

*because Ventura County is where we live, work and play*

September 2017

CFROG Board of Directors

Carol Holly, Chair  
Helen Conly, Secretary  
Suzanne Harvey, Treasurer  
John Brooks  
Tomas Rebecchi  
Merrill Berge

Kimberly Rivers, Executive Director

[ed@cfrog.org](mailto:ed@cfrog.org)

cell: 805-727-1393

PO Box 114 \* Ojai, CA 93024 \* 805-727-1393 \* [ed@cfrog.org](mailto:ed@cfrog.org) \* [www.cfrog.org](http://www.cfrog.org)

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



## Reimbursement Agreement for Appeal Processing

County of Ventura • Resource Management Agency • Planning Division  
800 S. Victoria Avenue, Ventura, CA 93009-1740 • (805) 654-2478 • [www.vcrma.org/planning](http://www.vcrma.org/planning)

APPEAL NUMBER: PL14-0103

- ☐ Coastal Appeal ☒ Non Coastal Appeal ☐ Violation Appeal ☒ Non Violation  
☐ Appeal Subdivision Ordinance

I, on behalf of CFROG, the undersigned, hereby authorize the County of Ventura to process the above referenced permit request in accordance with the Ventura County Ordinance Code. I am depositing \$ 1,000 to pay for County staff review, coordination and processing costs related to my permit request based on actual staff time expended. **In making this deposit, I acknowledge and understand that the deposit may only cover a portion of the total processing costs. Actual costs for staff time are based on hourly rates, which I understand are in the most current fee schedules of each county agency. I also understand that these costs apply even if the appeal is withdrawn or not upheld.** This deposit is (check one):

- ☒ the **billing limit** as set forth in the adopted Fee Schedule applicable at the time the appeal application is submitted ( 9/15/17 ); Or  
☐ a **deposit** without a billing limit for an appeal associated with a violation ( ).

I understand and agree to the following terms and conditions of this Reimbursement Agreement:

- Staff time from some County of Ventura departments and agencies spent processing my request will be billed against the deposit. **"Staff time" includes, but is not limited to, time spent reviewing application materials, site visits, responding by phone or correspondence to inquiries from the applicant, the applicant's representatives, neighbors, interested parties, attendance and participation at meetings and public hearings, and preparation of staff reports and other correspondence.**
- If the final cost is less than the deposit fee, the unused portion of the deposit will be refunded to me.

**The following only apply to Appeals associated with Violations:**

- If processing costs exceed the deposit, I will receive periodic invoices payable upon receipt.**
- If the final cost is more than the deposit fee, **I agree to pay the difference according to the terms set by the County.**
- Fees are due and payable within 30 days of billing. Invoices unpaid after thirty (30) days will incur a 2% late fee, compounded monthly.
- If I fail to pay any invoices within 30 days of the billing, the County may either stop processing my permit application, or after conducting a hearing, deny my permit request altogether. If I fail to pay any invoices after my application is granted, I understand that my permit is subject to revocation. Any work on any subsequent or concurrent permit applications will cease until all unpaid fees are paid in full.
- I agree to pay the County of Ventura the cost of placing a legal advertisement (if one is required) in a newspaper of general circulation as required by state law and local ordinance.

8. I may, in writing, request a further breakdown or itemization of invoices, but such a request is independent of the payment obligation and time frames.

Name of Appellant: Kimberly Rivers for CFROG/Tomas Rebecchi for Food & Water Watch

Driver's License Number:

Phone Number:

805-727-1393

Name of Company or Corporation (if applicable):

*If a Corporation, please attach a list of the names and titles of Corporate officers authorized to act on behalf of the Corporation.*

Citizens For Responsible Oil & Gas - CFROG/ Food & Water Watch

Mailing Address of Appellant:

CFROG: Post Office Box 114, Ojai, CA 93024

Signature:\*

Date:

9/15/17

**\*ATTENTION** — For appeals of projects located within the non-coastal zone that are unrelated to a violation, appellants who are also the project applicants will be responsible for all charges.

Appeal Fee for Non-Coastal Projects Unrelated to a Violation						
Appellant	Withdrawn	Denied	Upheld	Appellant Deposit	Applicant Share of Cost	Billing Limit
Non-Applicant	X			Refund of any unspent deposit funds	Up to \$1000 if appellant deposit is not sufficient	\$1000 for Appellant \$1000 for Applicant
		X		No refund unless unspent deposit funds, if any		
			X	Refund full amount of deposit		
Applicant	X			Refund of any unspent deposit funds	100%	No Billing Limit
		X		No refund unless unspent deposit funds, if any	100%	
			X	Refund full amount of deposit	None*	

\*If upheld in part, the decision-making body hearing the appeal will determine how much of the costs will be refunded.





# County of Ventura Planning Division

800 South Victoria Avenue, Ventura, CA 93009-1740 • (805) 654-2488 • <http://www.ventura.org/rma/planning>

Receipt No.: **614625**

Receipt Date: **09/15/2017**

## RECEIPT

### RECORD & PAYER INFORMATION

Record ID: PL14-0103  
Record Type: Planning Discretionary Entitlement  
Parcel Number: 2320062030  
Property Address: 3214 ETTING RD  
Description of Work: Minor Modification to Conditional Use Permit CUP 4384 (as modified by LU05-0086) for on-going Oil Exploration and Production at the Naumann Drillsite located in the Oxnard Plain east of the Etting Road and Highway 1 intersection and west of Naumann Road. The request includes 5 revisions to the existing entitlement:

1. Permit approval to remove the existing crude oil storage tanks and produced water storage tank and construct new tanks in a new containment area. Current crude oil storage is 1000 barrels in two 500 barrel tanks. The proposed crude oil storage is 2000 barrels in two tanks. The current produced water storage is 500 barrels. The proposed produced water storage is 1000 barrels. All three of the new proposed tanks are 1000 barrel tanks which are 21' in diameter and 16' tall. The first new crude oil tank and the new produced water tank will be constructed prior to drilling additional wells from the Project Site. The second new crude oil tank would be constructed following drilling. The new tanks will serve to replace the existing old tanks.
2. Permit approval to re-configure various pieces of existing equipment on the Project Site as shown on the "To-Be" site plan. Equipment that will be reconfigured are: water tank, oil tanks, firewater tank, vapor recovery, loading rack, light post, LACT skid, and the emergency gas flare. The containment area for the new water tank and oil tanks will be 30'x80'x3'. The reconfiguration will provide room on the drillsite for additional wells.
3. The existing permit allows for the existing well plus one additional new well. The applicant requests approval to drill four additional wells on the Project Site, for a total of five wells. The four new wells are to be designated #2, #3, #4, and #5. The proposed surface location for each of these wells is shown on the "To-Be" Site Plan. It is proposed that pumping units will be installed on each of these four wells and that the pumping units will be similar to the existing pumping unit in operation at the Naumann Drillsite.
4. Current condition A-19 limits tanker trucking from the Project Site to "Monday through Saturday, between 7:30 am and 6:30 pm, of the same day." It is requested that condition A-19 be revised to allow for the transportation of crude oil and waste water from the Project Site at all times. The Project Site is a central processing facility for RenPet's Cabrillo Oil Field operations and currently also serves RenPet's Rosenmund Drillsite. No residential streets are involved.
5. Reset the CUP expiration date to be 30 years from the date of this Minor Modification approval. Applicant also requests that existing condition A-2 be amended to remove time limits on the drilling phase for these additional wells; this would be consistent with other land use permits issued to RenPet (i.e. LU08-0117).

No additional grading or expansion of the existing pads is required.

Payer: Citizens For Responsible Oil & Gas

Applicant: Marc Traut  
Renaissance Petroleum  
P O BOX 20456  
BAKERSFIELD, CA  
BAKERSFIELD, CA 93390-0456

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**PAYMENT DETAIL**

Date	Payment Method	Reference	Cashier	Comments	Status	Amount
09/15/2017	Check	1143	TORRESN		Paid	\$1,000.00

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**FEE DETAIL**

Fee Description	Invoice #	Quantity	Fee Amount	Current Paid	Balance Due
Appeals related to entitlements or Planning Director and F	249102	1.00	\$1,000.00	\$1,000.00	
			\$1,000.00	\$1,000.00	\$0.00

NOTE: This receipt may not list all related entitlements. Where a project requires the filing of multiple land use entitlement applications, a single deposit fee with no billing limit may be assessed and collected. This single deposit fee shall be the highest of the required filing fees or deposits associated with the multiple land use entitlements and there shall be no billing limit. This calculation of a single deposit fee shall be in addition to and separate from the calculation and payment of a Late Filing Fee.