

Renaissance Petroleum, LLC

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July 15, 2019

By: email only

Ventura County Board of Supervisors
c/o Clerk of the Board
800 South Victoria Avenue
Ventura CA 93009-1920

**Re: Renaissance Petroleum, LLC, Cabrillo Oil Field (Cabrillo), Ventura County, California
Appeal of Approved Minor Permit Modification, Case No. PL 14-0103**

Dear Honorable Chair Bennett and Members of the Board of Supervisors,,

The subject appeal will be before you as a De Novo hearing on July 23, 2019. The attached document will provide you with important information about the Project that Renaissance Petroleum, LLC (RenPet) believes that you should have before you as decision makers. The following summarizes the approved Permit Modification in pertinent part:

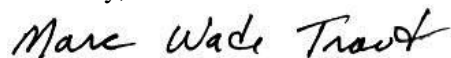
- Four additional wells with no change in site boundary,
- Limitations on truck trips,
- A reset of the term of the Permit (existing term ends May 21, 2037, approved term ends April 13, 2047),
- Project approved by Planning Director April 3, 2017, over two years ago
- Project approved by Planning Commission on September 7, 2017, nearly two years ago.

The following summarizes the attached document and includes reference to pertinent sections within:

- The bases for the appeal are the same as were brought before the Planning Commission (see 1.0),
- The Appellants' statements forming the bases for the appeal are false (see 1.0),
- The permit was originally issued and subsequently modified after CEQA determinations (see 2.0)
- The permit is consistent with Ventura County NCZO (see 2.0) and General Plan,
- Cabrillo operations are in compliance with all regulatory agencies (see 3.0),
- Cabrillo operations involve production of light oil and natural gas (see 4.0),
- RenPet is approved for waste water injection which commenced in 2017 (see 5.0)
- To date waste injection has resulted in the elimination of over 700 truck trips (see 5.0),
- The Naumann Drillsite continuous pilot flare was eliminated in February 2019 (see 6.0),
- The temperature of the emergency flare is significantly higher than the thermal destruction temperature of toxic substances found in the gas (see 6.0),
- The air quality adjacent to the Project site with respect to toxic compounds is better than at APCD's Simi monitoring station, and better than all CARB monitoring stations in southern California (see 7.0),
- CalEnviroScreen 3.0's pollution characteristics contains errors and inconsistencies (see 8.1-8.6)
- CalEnviroScreen 3.0 is not a proxy for CEQA project analysis (see 8.7),
- A health risk assessment was performed by APCD and determined that emissions from this project would not result in a significant adverse impact (see 9.0).

I ask for your favorable consideration of RenPet's permit modification, as supported by an extensive administrative record, your Planning Commission and Staff. Please let me know if you or your staffs have any questions.

Sincerely,



Marc Wade Traut
President

Attachment: Supplemental Information
CC: Kim Prillhart, Director, Ventura County RMA, by email

ATTACHMENT
SUPPLEMENTAL INFORMATION
APPEAL OF APPROVED MINOR PERMIT MODIFICATION
CASE NO. PL 14-0103

Introduction

- 1.0 Appeal History of Minor Permit Modification PL 14-0103
- 2.0 Cabrillo Permit History
- 3.0 Cabrillo Present Operations
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Introduction

The one acre Naumann Drillsite is located on Etting Road, between the intersections of Dodge and Hailes Roads. The drillsite has been in operation since 1986. There is one operating well on the site. In 2007, the County approved a second well, though that well was never drilled. At that time, the County also authorized pipelines to connect the Naumann Drill Site with the existing Rosenmund Drillsite located on Pleasant Valley Road. (The Rosenmund Drillsite is independently approved for 15 wells.) Oil is trucked off site and natural gas is delivered to SoCal Gas via an onsite connection, which allows for distribution of the natural gas directly to customers in south Oxnard and surrounding areas.

In February 2017, the County held an administrative public hearing and approved a modification to the existing permit. On appeal, the Planning Commission approved the modification on September 2017, including these key provisions:

- Four new wells for a total of 5
- Replacement of existing tanks
- New restrictions on tanker truck traffic from unlimited to 10 truckloads per day
- An extension of the permit effective date by ten years (from 2037 to 2047)

RenPet, a small family-owned business with local employees, has been a good neighbor and citizen. There have been no complaints and no notices of violation involving either land use permit during their history of operations in Ventura County.

It is important to note that without the approval of the modification, the existing legally vested land use permit will remain in place through 2037, but without the new restrictions (including

truck trip limitations) that are part of the permit modification as approved by the Planning Commission and accepted by RenPet.

1.0 Appeal History of Minor Permit Modification PL 14-0103

Following Planning’s review of RenPet’s application, CEQA review, and Planning Director hearing in February 2017, the Planning Director approved the subject minor permit modification on April 3, 2017. The approval was subsequently jointly appealed by two groups, Citizens for Responsible Oil & Gas, now known as Climate First: Replacing Oil and Gas (CFROG), and Food & Water Watch (FWW). CFROG and FWW are collectively referred to in this document as the Appellants. The Appellants appealed the approval to the Planning Commission and demanded an environmental impact report to address the impacts of **four operational activities associated with Cabrillo Oil Field (Cabrillo) on minority and low income housing, the general public, and agricultural land**. The primary appeal points regarding operational activities that the Appellants objected to are, verbatim, as follows, accompanied by Applicants comments:

Appellants’ Appeal Point 1: “The proposed change of the Rosenmund pad for use as an injection well for production waste from the Naumann Drill pad;”

Applicant’s Comment: *The Appellant’s appeal point is groundless and false. The subject minor permit modification does not involve a “proposed change” of the Rosenmund Drillsite for the injection of produced water. The Rosenmund Drillsite under CUP-5252 (LU08-01117) has a legally vested land use entitlement for the injection of produced water. RenPet obtained an underground injection control (UIC) permit approval from the Division of Oil and Gas and Geothermal Resources (DOGGR) on March 16, 2017. Cabrillo produced water injection activities commenced at the Rosenmund Drillsite in May, 2017. The Rosenmund Drillsite CUP-5252 (LU08-01117) entitlement for the injection of produced water from the Cabrillo Oil Field is not a part of the subject minor permit modification.*

Appellants’ Appeal Point 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;”

Applicant’s Comment: *The Appellant’s appeal point is groundless and false. The subject minor permit modification does not involve a “proposed change” of the gathering pipeline for transporting crude oil from the Rosenmund Drillsite to the Naumann Drillsite. The gathering pipelines were installed in 2007, have been in operation for more than ten years, and were authorized by Naumann Drillsite CUP-4384 (LU07-0086). The interconnection of the two drillsites by the gathering lines eliminated the need to build separate and duplicative permanent facilities on the Rosenmund Drillsite in compliance with Ventura County NCZO Sec. 8107-5.5.2, 8107-5.5.4, and 8107-5.5.7 which require operators to consolidate facilities, minimize flaring of natural gas and to minimize the size of drilling pads to “generate minimal negative impacts on the environment.”*

Appellants' Appeal Point 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;"

Applicant's Comment: *The Appellant's appeal point is groundless and false. Since the approval of minor permit modification LU07-0086 to the parent CUP-4384 for the Naumann Drillsite in 2007, the facilities at the Naumann Drillsite have served the Rosenmund Drillsite and have eliminated the need to build separate permanent facilities on the Rosenmund Drillsite in compliance with Ventura County NCZO Sec. 8107-5.5.2, 8107-5.5.4, and 8107-5.5.7 which requires operators to consolidate facilities, minimize flaring of natural gas and to minimize the size of drilling pads to "generate minimal negative impacts on the environment." The only "proposed change" under the subject minor permit modification is the addition of the processing of the new wells that are proposed for the Naumann Drillsite.*

Appellants' Appeal Point 4: "The approval of the Naumann Drill pad as the production facility for the entire newly developing Cabrillo Oilfield."

Applicant's Comment: *The Appellant's appeal point is groundless and false. The Cabrillo Field is not a new resource. Production was established from the Naumann Drillsite CUP-4384 in 1993. Production was established from the Rosenmund Drillsite CUP-5252 in 2006. The field name was designated by DOGGR in 2006. The two sites were linked by two gathering pipelines in 2007. Again, by interconnecting these two facilities RenPet was in compliance with Ventura County NCZO Sec. 8107-5.5.2, 8107-5.5.4, and 8107-5.5.7 which require operators to consolidate facilities, minimize flaring of natural gas and to minimize the size of drilling pads to "generate minimal negative impacts on the environment." The consolidation of facilities such as RenPet has done at Cabrillo is consistent with the Ventura County NCZO. The entitlement for the interconnection was authorized by Naumann Drillsite CUP-4384 (LU07-0086) in 2007 and is not a part of the subject minor permit modification.*

The matter of the appeal was brought before the Planning Commission on September 7, 2017. During the hearing Planning staff and RenPet pointed out to the Planning Commission the numerous inconsistencies concerning the Appellants' four appeal points as described above. At the end of the De Novo hearing, after considering all of the information provided by Planning staff, RenPet, the Appellants, and the public, the Planning Commission denied the Appellants appeal by approving the Applicant's permit modification on a 3-1 decision with one abstention.

On September 15, 2017 the same Appellant group filed an appeal of the Planning Commission's decision to the Board of Supervisors. The basis for this second appeal was unchanged from the first appeal. The appeal was originally scheduled to be heard on December 5, 2017. In late November of 2017 RenPet was informed by Planning staff that the December hearing was postponed as a result of "staffing issues" Shortly thereafter the Thomas fire occurred. The appeal is finally scheduled to be heard before the Board of Supervisors on July 23rd, 2019, nearly two years after the hearing before the Planning Commission.

2.0 Cabrillo Permit History

Conditional Use Permit (CUP) 4384 was originally issued to Cities Service Oil and Gas Corporation (Cities) in 1986 for the Naumann Drillsite. The permit included the adoption of a mitigated negative declaration environmental document that was consistent with the environmental findings of the lead agency (Ventura County Planning) in its application of the California Environmental Quality Act (CEQA) to the proposed project. The intention of Cities was to drill an exploratory well from the Naumann Drillsite as a follow-up to a well that was previously drilled by Sun Oil Company within the city limits of Oxnard, just west of the intersection of Etting Road and Pacific Coast Highway (PCH). Cities drilled the Naumann No.1 well in 1987 that resulted in the completion of a well capable of modest amounts of very light oil and natural gas.

In 1988 Cities assigned the Naumann Drillsite (CUP-4384) and the Naumann No.1 well to Decalta International Corporation (Decalta). In 1989 Decalta applied for a permit adjustment to CUP-4384 for the drilling of two additional wells (for a total of 3 wells) from the Naumann Drillsite with the proposed drilling to occur before the end of 1989. The request was approved by the Planning Director. The approval to drill the additional 2 wells expired before they were drilled. In 1990 Decalta assigned CUP-4384 and the Naumann No.1 well to Commander Oil Company, Ltd. (Commander). In accordance with the Ventura County Non-Coastal Zoning Ordinance (NCZO), CUP-4384 was transferred from Decalta to Commander, and in accordance with California State Division of Oil and Gas and Geothermal Resources (DOGGR) regulations, the Naumann No.1 well was transferred from Decalta to Commander. Commander proceeded to install production facilities at the Naumann Drillsite and to establish an interconnection into the Southern California Gas Company (SCG) distribution system so that produced natural gas could be sold to the local market. Oil and gas production commenced from the Naumann No.1 well (while under Commander's operations) on the Naumann Drillsite in 1993.

In 2002 RenPet applied for and acquired a land use entitlement for the development of a 3-acre drillsite located just north of Pleasant Valley Road and approximately 4000 feet north of Commander's Naumann Drillsite. RenPet's drillsite was designated CUP-5252 and is referred to as the Rosenmund Drillsite. CUP-5252 involved the adoption of a mitigated negative declaration environmental document that was consistent with the environmental findings of the lead agency in its application of CEQA standards to the proposed project. RenPet's efforts to acquire and permit the Rosenmund Drillsite were done completely independent of Commander's Naumann Drillsite and CUP-4384. The Rosenmund Drillsite CUP-5252 was originally approved for five wells and a full suite of production facilities including tankage, an emergency flare, produced water injection facilities, and a gas connection.

In 2004, Commander and RenPet entered into an agreement whereby RenPet would assume operatorship of the Naumann Drillsite and CUP-4384 and meanwhile proceeded to drill wells from the Rosenmund Drillsite on CUP-5252. In 2004, in accordance with the Ventura County NCZO and in accordance with DOGGR regulations, Commander transferred the Naumann Drillsite and CUP-4384 and the Naumann No.1 well to RenPet. In October of 2005 the Rosenmund Drillsite CUP-5252 was use inaugurated.

Also in late 2005, RenPet applied for an extension and modification of the Naumann Drillsite CUP-4384 as the original 20-year term was set to expire in 2006. That latter permit modification application was designated LU05-0086.

Drilling from the Rosenmund Drillsite commenced in 2006. Two of the three wells that were initially drilled from the Rosenmund Drillsite were successfully completed. With the completion of additional wells in the similar reservoir as the one-well field associated with the original Naumann No.1 well, DOGGR recognized the resource as a multi-well field. The resource was designated the Cabrillo Oil Field in October 2006.

In 2007, RenPet made the decision to interconnect the Rosenmund and Naumann drillsites with two 4" gathering pipelines. In this way, all of the fluids produced from the Rosenmund Drillsite which included oil, water, and gas could be transported to the Naumann Drillsite for processing, storage, and sales for natural gas and oil. Produced water was also stored at the Naumann Drillsite prior to being shipped by truck for disposal at a commercial disposal facility. By interconnecting these two facilities, RenPet was in compliance with Ventura County NCZO Sec. 8107-5.5.2, 8107-5.5.4, and 8107-5.5.7, which require operators to consolidate facilities, minimize flaring of natural gas and to minimize the size of drilling pads to "generate minimal negative impacts on the environment."

The Naumann Drillsite permit modification CUP-4384 (LU05-0086) was approved following a Planning Director hearing on May 17, 2007. That permit modification included approval of the interconnection of the Rosenmund Drillsite and Naumann Drillsite by way of the two gathering lines, and the extension of the term of the permit until May 21, 2037. The fully permitted gathering lines were installed in August-September 2007, and went into service immediately upon their completion. The interconnection of the two drillsites by the gathering lines eliminated the need to build separate permanent facilities on the location of the Rosenmund Drillsite, again in accordance with Section 8107-5.5 of the Ventura County NCZO. The image below shows the location of the two RenPet permits in relation to one another and the location of the two gathering lines that interconnect the two drillsites.



In 2008 RenPet applied for a modification of CUP-5252 to include the drilling of up to fifteen wells from the Rosenmund Drillsite. That modification was approved on July 7, 2010 and involved the adoption of an addendum to the mitigated negative declaration. The approved minor permit modification was designated (LU08-0117).

RenPet applied for a permit modification to the Naumann Drillsite CUP-4384(LU05-0086) for the installation of an NGL tank in which to capture volatile natural gas liquids. These components are a vapor at atmospheric pressure. The permit adjustment was approved in late 2011 and was designated LU10-0089 and included an addendum to the mitigated negative declaration environmental document.

In mid-2014, RenPet's entitlement to drill well Naumann No.2 from the Naumann Drillsite expired under the terms of CUP-4384 (LU05-0086). In August 2014 RenPet submitted an application for a minor permit modification of the Naumann Drillsite CUP-4384 to include the drilling of four additional wells, the rearrangement and increase in size of tankage on location, and to reset the term of the CUP for thirty years, and limiting the number of truck trips. A Planning Director hearing was held in February of 2017 and the minor permit modification was subsequently approved. The history regarding the appeals of this approved minor permit modification was discussed in the previous section.

It is also noted for the record, that in 2007 the Planning Director granted approval to RenPet for a land use permit for a separate drillsite within the Cabrillo Oil Field. RenPet made a business decision to not inaugurate the CUP, allowed the land use permit to expire in 2012 and allowed the surface lease to expire. The Naumann and Rosenmund drillsites are the only facilities that RenPet operates.

3.0 Cabrillo Present Operations

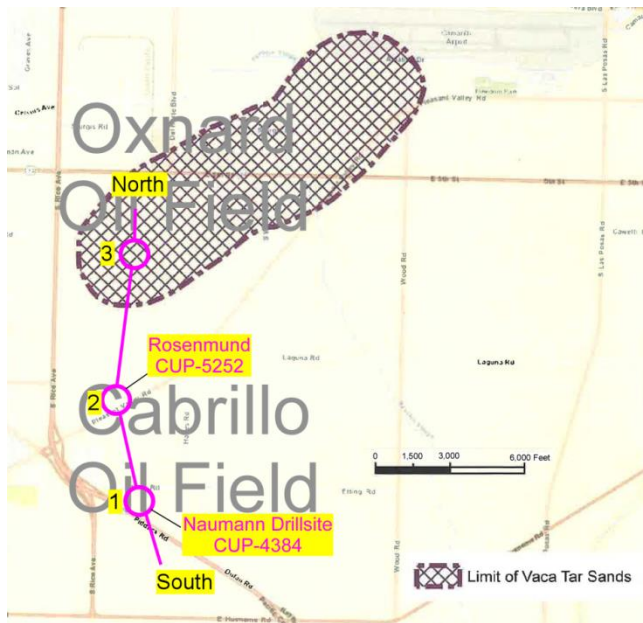
As noted above, RenPet produces light oil (37° API) and natural gas from Cabrillo. The productive reservoirs for Cabrillo range from approximately 5500 feet below ground to approximately 7000 feet below ground. Currently at the Naumann Drillsite CUP-4384 there are one producing well, separation facilities, gas processing facilities, crude oil and produced water storage facilities, and a specialized storage tank for natural gas liquids (NGLs). Currently at the Rosenmund Drillsite CUP-5252 there are six producing wells, one idle well, and one well dedicated to the injection of produced water for disposal. The Naumann Drillsite and the Rosenmund Drillsite are interconnected by two 4” gathering pipelines. All of the produced fluids associated with the Cabrillo Oil Field are processed and stored at the Naumann Drillsite. Oil and NGLs are transported from the Naumann Drillsite by tanker truck. Produced water is transported from the Naumann Drillsite to the Rosenmund Drillsite by way of a gathering line for injection in produced water disposal well VR No.4, resulting in the elimination of all truck trips previously associated with produced water.

RenPet’s current operational activities are in full compliance with all of the Ventura County NCZO and all permit conditions associated with the Naumann Drillsite CUP-4384 and the Rosenmund Drillsite CUP-5252. The recent history of inspections for RenPet’s Cabrillo facilities is as follows:

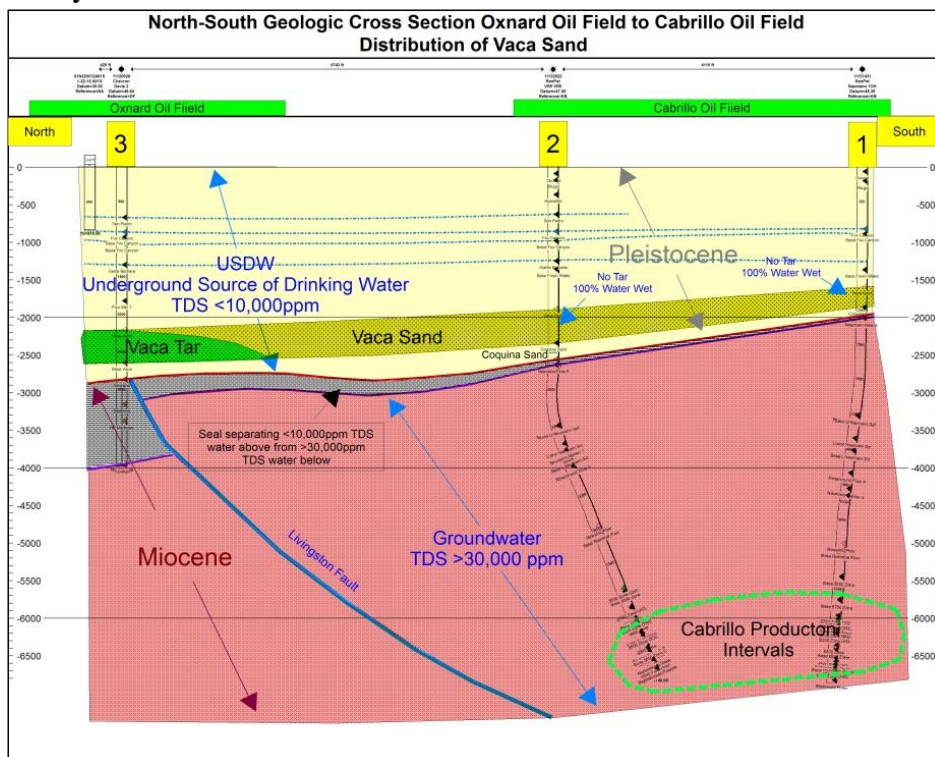
- Ventura County Environmental Health: December 20, 2018
- Ventura County APCD: February 19, 2019
- Ventura County Planning: February 22, 2019
- DOGGR: April 24, 2019

4.0 Distinction between the Cabrillo Oil Field and Oxnard Oil Field Vaca Tar Sand

A map of the central Oxnard Plain was prepared by Ventura County to show the area of the Oxnard Oil Field that would be impacted by the April 2019 moratorium imposed on drilling and re-drilling for the Vaca Tar Sand resource. The map area of the limit of the Vaca Tar Sand is indicated in a crosshatched brown grid. The map below is a portion of the Ventura County map that has been annotated to show the location of the RenPet’s Naumann Drillsite (CUP-4384) and Rosenmund Drillsite (CUP-5252) from which RenPet produces the Cabrillo resource relative to the distribution of the Vaca Tar Sand area.



The figure below is a north-south geologic cross section between the southwestern Vaca Tar Sand area of the Oxnard Oil Field and the Cabrillo Oil Field. The location of the cross section is shown by a magenta index line on the map above. The yellow number “1” on the map corresponds with the location of RenPet’s Naumann Drillsite and also corresponds with the number “1” on the cross section. The yellow number “2” on the map above corresponds with the location of the Rosenmund Drillsite and with the number “2” on the cross section. The yellow number “3” on the map corresponds with the location of the abandoned Chevron Davis No.2 well which corresponds with yellow number “3” on the cross section.



As shown on the cross section, Cabrillo produces from Miocene age reservoirs more than 5,000' below the surface of the ground. The hydrocarbons that are produced include very light oil and natural gas. In contrast to Cabrillo, the Vaca Tar Sand production within the separate Oxnard Oil Field involves ultra-heavy tar that has become biodegraded in the presence of fresh water resources in sands of Pleistocene age. The limit of the Vaca Tar Sand is well defined. DOGGR and RenPet records indicate that none of the thirteen wells that have been drilled within the limits of the Cabrillo Oil Field have encountered any tar sand resource.

5.0 Cabrillo Produced Water Injection – Elimination of Truck Trips

In January 2016 RenPet submitted an application to the California Division of Oil and Gas and Geothermal Resources (DOGGR) for an Underground Injection Control (UIC) permit to inject and dispose of Cabrillo produced water. The host zone for injected produced water is the upper portion of the Miocene Conejo Formation, specifically a number of informally named units referred to as the Naumann Sand member. In 2006 the host zone yielded water having a total dissolved solids (TDS) content of >50,000 ppm, well above the limit of an Underground Source of Drinking Water (USDW), which is defined as groundwater having TDS <10,000 ppm.

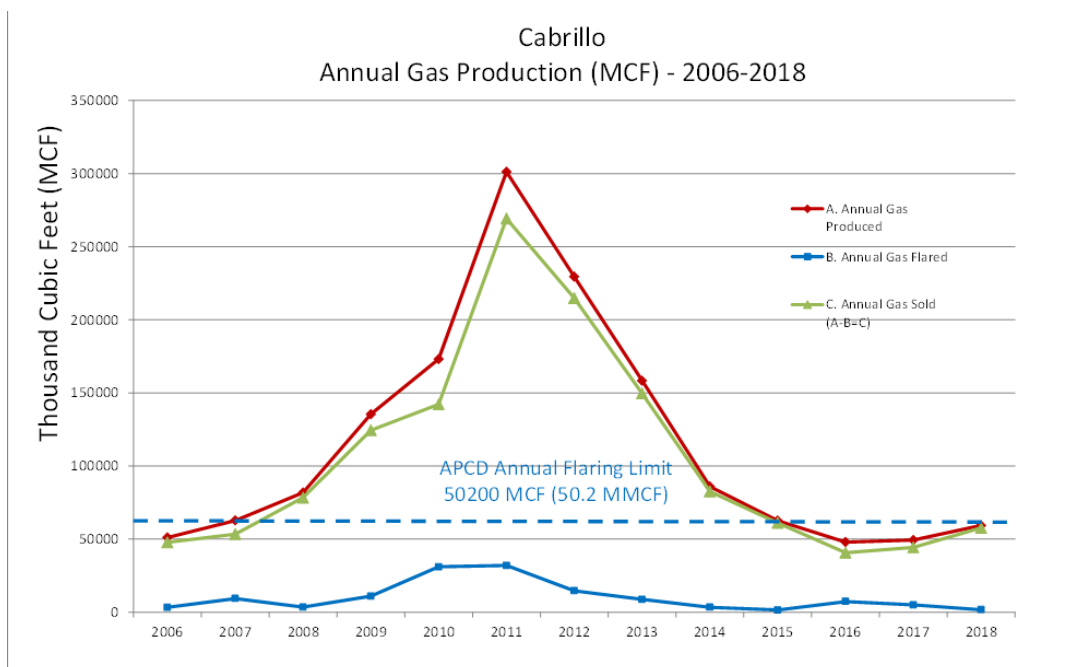
RenPet's UIC permit application (DOGGR project code #0910011) was approved by DOGGR on March 16, 2017. The reviewing agencies included the local Coastal Division of the DOGGR, the Sacramento headquarters office of the DOGGR, the Sacramento headquarters office of the State Water Resources Control Board (SWRCB), and the regional office of the SWRCB located in Diamond Bar.

In May of 2017, RenPet's idle well VR No.4 was converted to an injection well for produced water disposal. RenPet's Rosenmund Drillsite CUP-5252 (LU08-0117) entitlement provides for injection activities. Since the conversion of well VR No.4 as a produced water disposal well, all Cabrillo produced waste water has been injected into the Naumann sands. Prior to the commencement of produced water injection operations at the Rosenmund Drillsite, RenPet transported all of its produced water from the Naumann Drillsite to a commercial disposal facility by tanker truck. For the first several months of waste water injection operations, produced water that was stored at the Naumann Drillsite was transported by truck to the Rosenmund Drillsite for injection. In August of 2017, one of RenPet's two gathering lines between the Rosenmund and Naumann drillsites was dedicated to the transportation of produced water from the Naumann Drillsite to the Rosenmund Drillsite. That change eliminated truck traffic that had previously been dedicated to either hauling Cabrillo produced water to a third-party for disposal or for hauling produced water from the Naumann Drillsite to the Rosenmund Drillsite after approval of the UIC permit. Since RenPet commenced water injection activities in 2017, more than 700 round-trip truck trips between the Naumann Drillsite and the Rosenmund Drillsite have been eliminated.

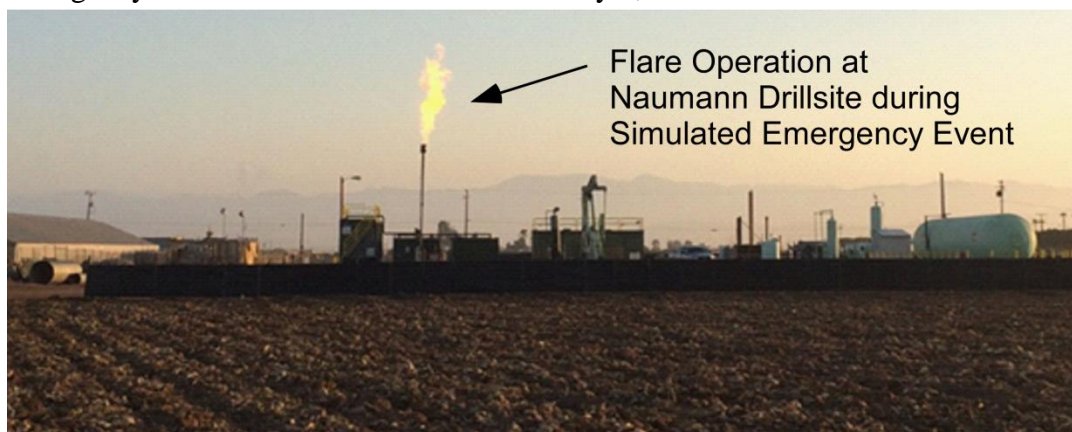
6.0 Flaring at the Naumann Drillsite

As mentioned above, the hydrocarbons that are produced by RenPet include light oil and associated natural gas. All of Cabrillo's natural gas is processed at the Naumann Drillsite in accordance with the Ventura County NCZO oil development guidelines Sec. 8107-5.5.7, which requires operators to minimize flaring of natural gas and to consolidate facilities. Once processed at the Naumann Drillsite, the natural gas enters the distribution pipeline system of the Southern California Gas Company (SCG) for distribution and consumption by local Ventura County customers in accordance with Ventura County NCZO Sec. 8107-5.5.5. The processed natural gas is routed to an emergency flare if the gas cannot be accepted into the SCG distribution pipeline system. The reasons why the gas may not be accepted into the pipeline vary. They can include processing upsets in RenPet's processing facilities that are either mechanical or weather related, or they can be related to issues being experienced by SCG with respect to the space available in the SCG distribution pipeline which are dependent on demand, weather, and the pressure at which SCG is maintaining the distribution system.

RenPet's existing CUP-4384 for the Naumann Drillsite provides for emergency flaring. RenPet's existing permit to operate (PTO) issued by the Ventura County Air Pollution Control District (APCD) permits RenPet to flare as much as 50,200 Mcf per year. RenPet's historical gas production and the amount of gas flared are shown on the graph below. In 2018 RenPet produced 59,317 Mcf of gas of which 1,683 Mcf or 2.8% was flared. Much of the gas that was reported as having been flared was a product of a pilot light system. In February 2019 RenPet installed an electronic ignition system on the flare stack which eliminated the need for a continuous pilot flare.



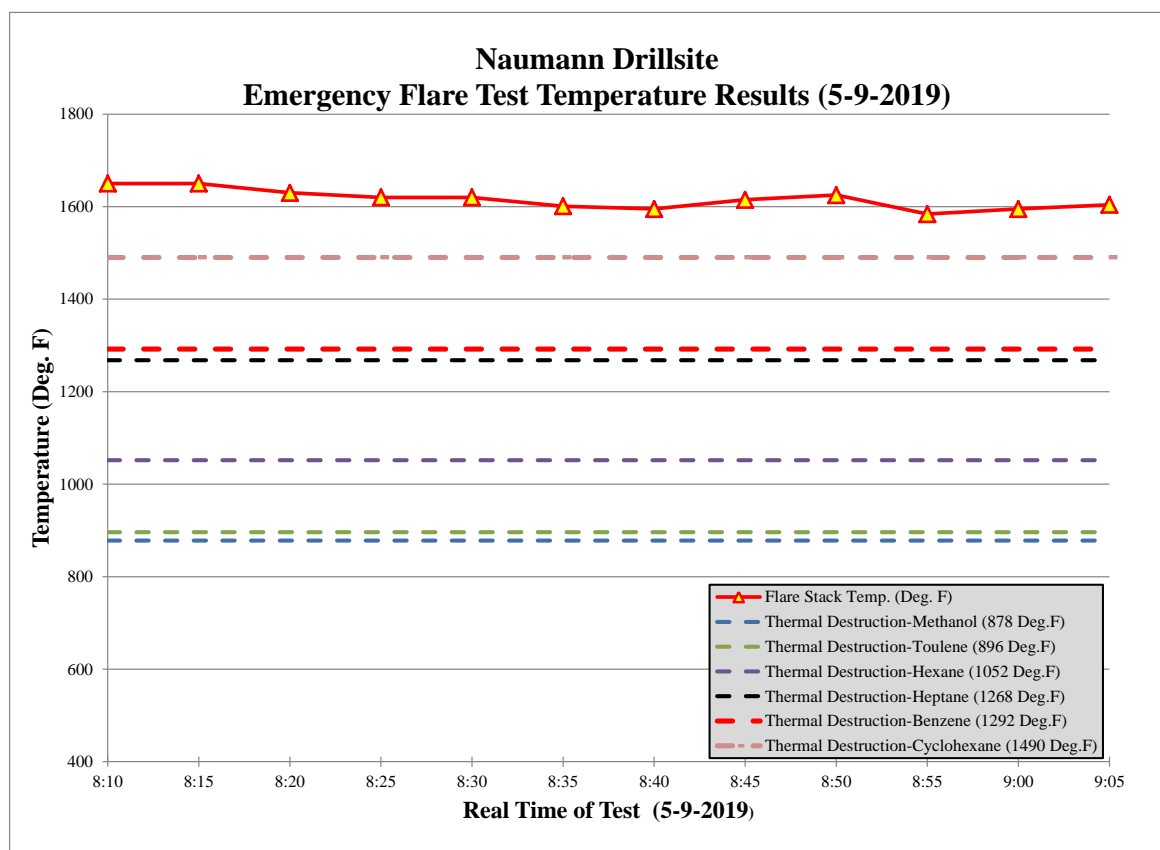
The picture below is of the emergency “candlestick” type flare in operation during a simulated emergency event on Naumann Drillsite on July 6, 2017.



In May 2019 RenPet voluntarily commissioned an independent study to measure the exhaust temperature of the emergency flare and to simultaneously sample the gas stream feeding the flare to analyze the content of volatile organic compounds (VOCs) in the processed natural gas prior to combustion. AIRx Services, Inc. (AIRx) was responsible for the gas sampling and temperature recording. A representative from the Ventura County APCD witnessed the test. The gas samples were collected in specially-prepared canisters and analyzed by gas chromatography/mass spectrometry. Atmospheric Analysis & Consulting, Inc. (AAC) performed the EPA TO-15 laboratory analysis to measure the sampled gas for concentrations of VOCs on each of the three sample containers that were filled during the stages of the test. The samples were analyzed for sixty-eight different VOCs. The test results showed that there were a total of six VOCs present in the three gas samples that had concentrations greater than the minimum detectable limit the analytical device. The identification and concentration of each of these compounds is provided in the spreadsheet below, in addition to the thermal destruction temperature of each compound.

EPA TOC-15 Gas Analyses of Gas Stream Feeding Flare Temperature Test May 9, 2019				
VOC	Summa Canister No.135 (ppb)	Summa Canister No.25 (ppb)	Summa Canister No.146 (ppb)	Thermal Destruction Temperature
Methanol	173,000	194,000	208,000	878 °F
Hexane	13,200	11,100	12,900	1052 °F
Cyclohexane	5,550	4,100	4,210	1490 °F
Benzene	4,810	3,870	3,700	1292 °F
Heptane	4,480	2,870	2,480	1268 °F
Toluene	4,680	2,930	2,070	896 °F

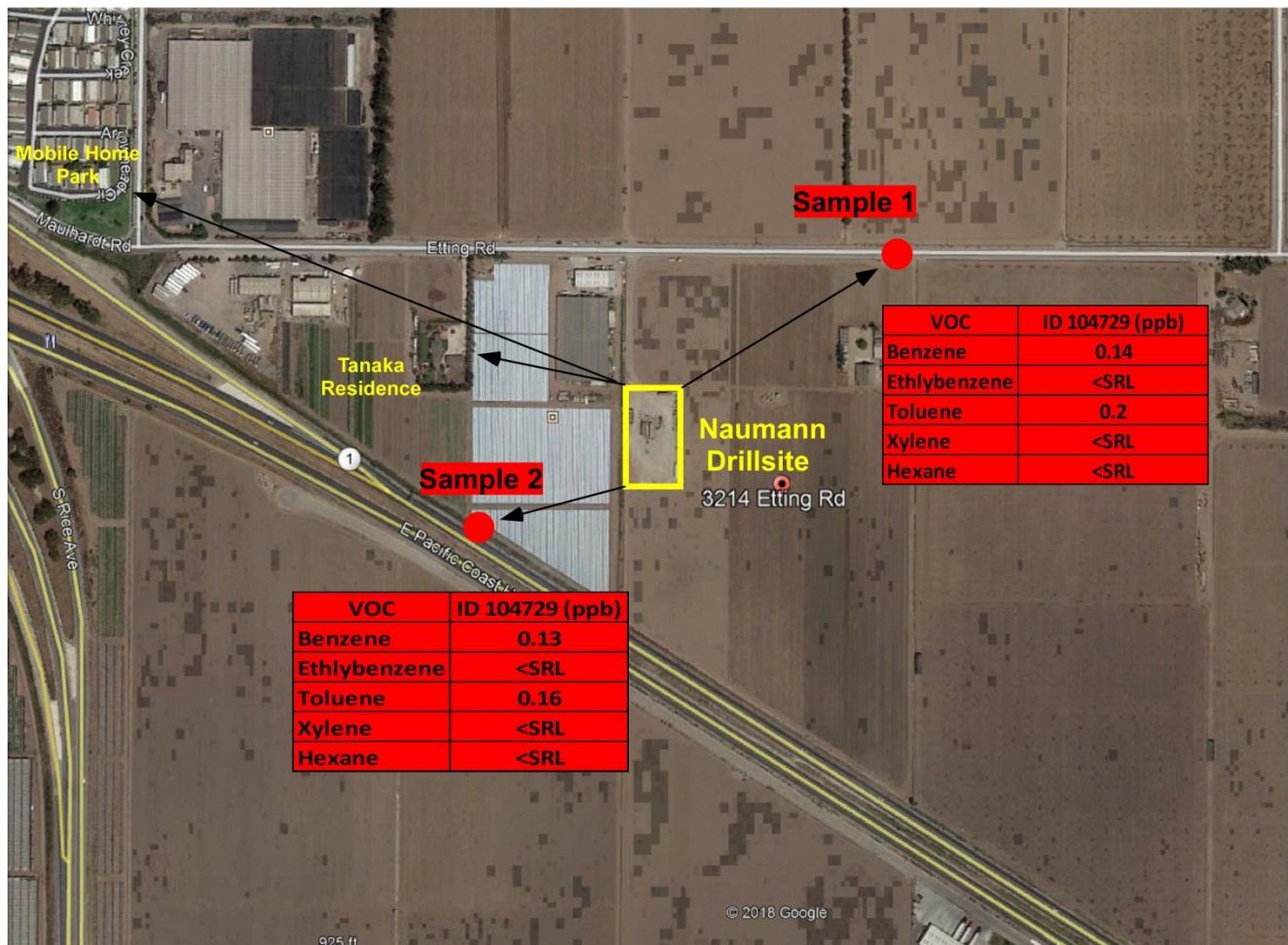
In all cases, the temperature of the emergency flare exceeded the published thermal destruction temperature of these compounds. Thus, all or nearly all of these compounds are destroyed by combustion at the flare temperatures measured at the Naumann Drillsite flare. The findings from this test are summarized in the graph below. The full AIRx report including the gas analyses was submitted under separate cover to Ventura County Planning and is part of the record for the subject permit application.



7.0 Air Quality – Naumann Drillsite

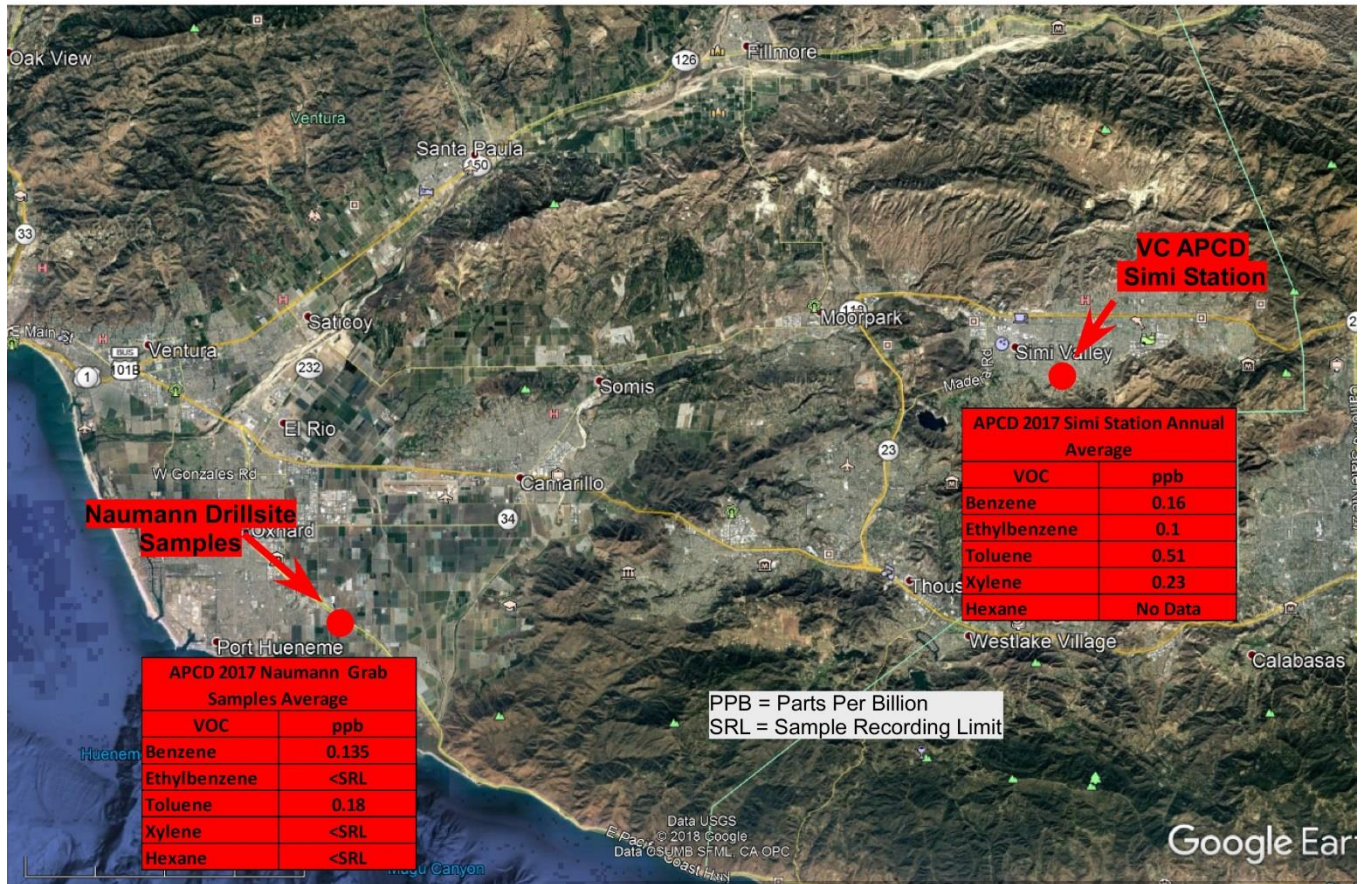
On November 15, 2017 three representatives from the Ventura County Air Pollution Control District (APCD) visited the Naumann Drillsite to inspect the drillsite and to capture ambient air samples in the immediate vicinity of the drillsite. Two samples were captured. The two samples were processed by the ACC lab to determine the concentration of toxic compounds present in the samples in accordance with EPA test TO-15. The locations of the two samples in relation to the Naumann Drillsite are shown on the image below. Sample 1 was located northeast of the drillsite and Sample 2 was taken southwest of the drillsite. The concentrations of the compounds are shown adjacent to the sample locations shown on the image below in parts per billion (ppb). The analytical analysis from ACC was provided by APCD to RenPet on request.

LOCATION OF APCD 11-15-2017 Naumann Drillsite “Grab” SAMPLES



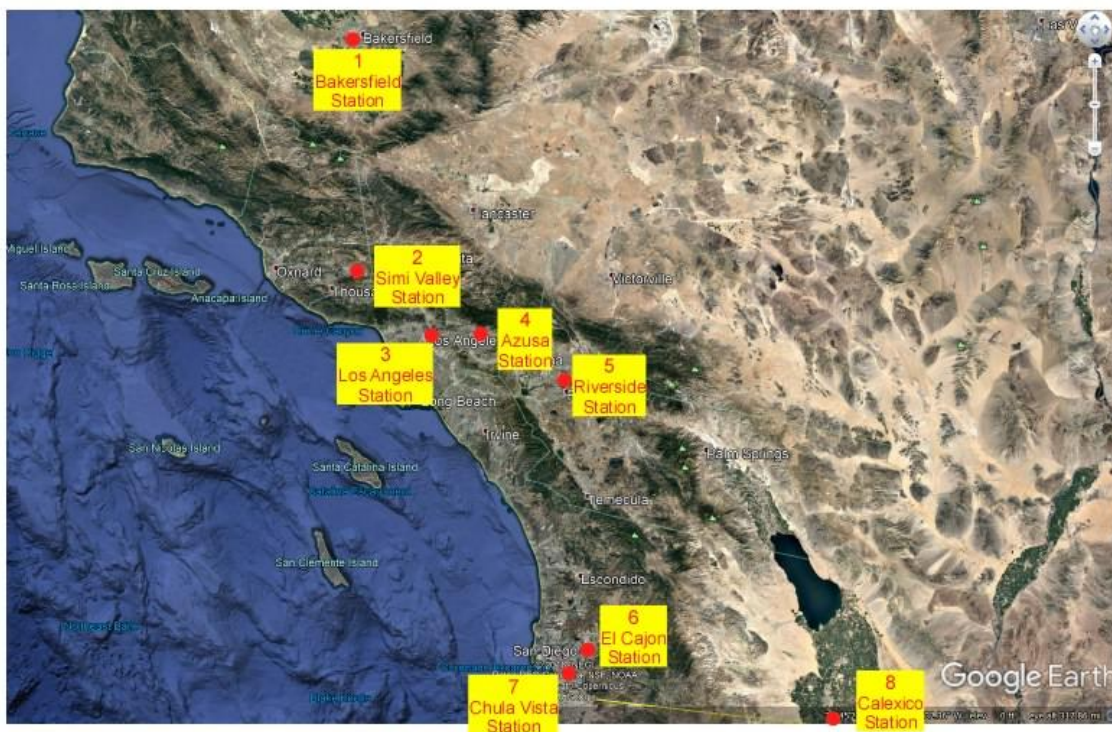
The location where baseline ambient air samples are measured in Ventura County is located in Simi Valley. The image below shows the published 2017 annual average concentration for toxic compounds recorded at the Simi station (www.arb.ca.gov/adam/toxics/sitepages/benzsimi.html). The data indicates that the concentration of toxic compounds in the forms of benzene, ethylbenzene, toluene and xylene, are greater at the APCD Simi station than at either of the two locations sampled in the immediate vicinity of the Naumann Drillsite. The aforementioned four compounds are commonly collectively referred to as BETX.

LOCATION OF APCD AMBIENT BASELINE SAMPLE RELATIVE TO NAUMANN DRILLSITE SAMPLES

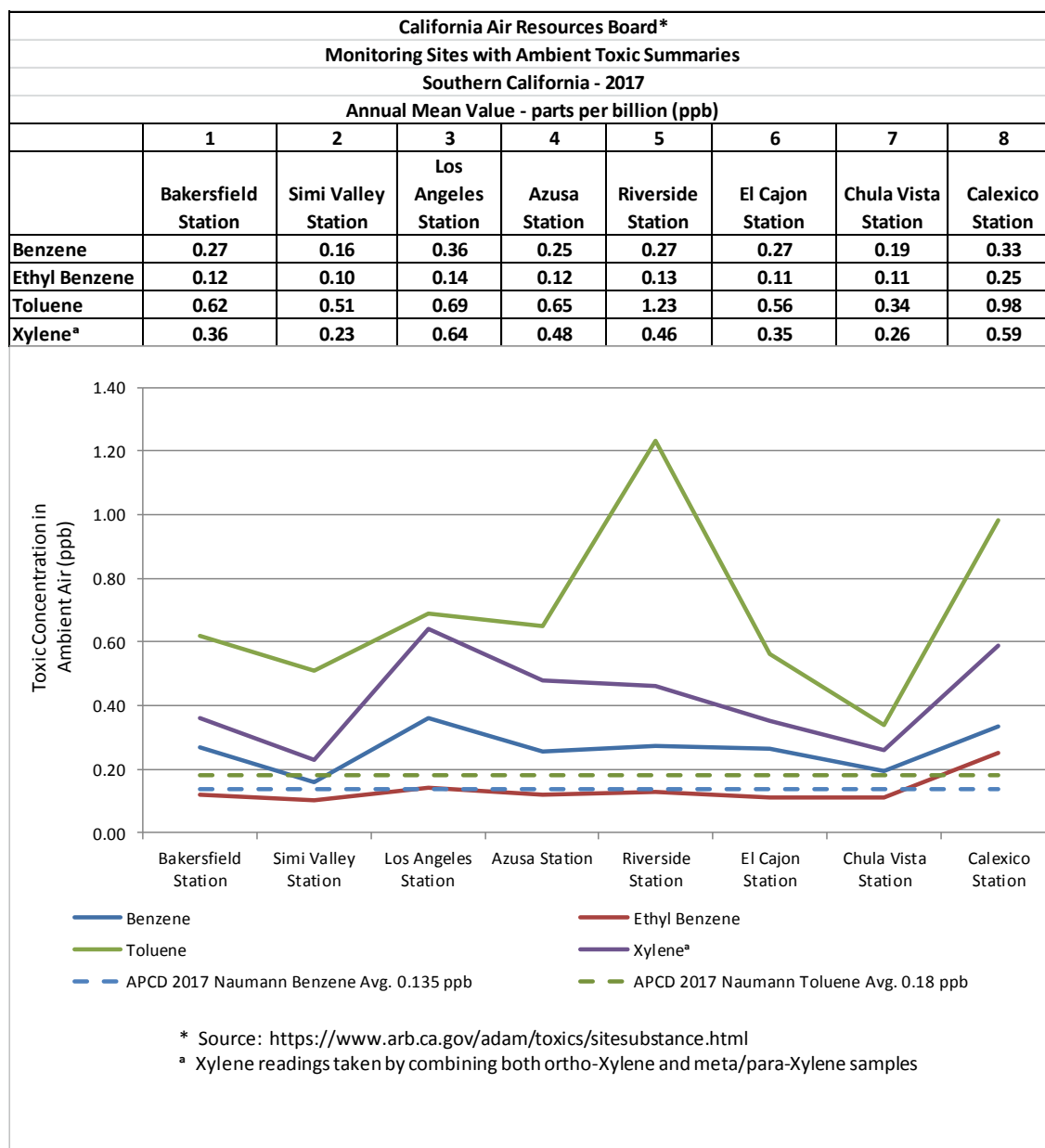


The California Air Resources Board (CARB) reports annual toxic summaries for volatile organic compounds for various monitoring sites throughout California. For the reporting year 2017, there are seven stations that reported data that include ambient measurements for benzene, ethylbenzene, toluene, and xylene, the BETX group. The locations of these seven stations for southern California plus the location for the Bakersfield station are shown on the image below.

LOCATION OF 2017 CARB MONITORING SITES IN SOCAL FOR ANNUAL TOXIC SUMMARIES FOR VOCs



The combination spreadsheet and graph below shows the relative concentrations of BETX for the seven reporting sites located in southern California plus the reporting site for Bakersfield, which is part of the CARB northern California sample stations. Also included on the graph are the average values from the November 2017 samples collected by the Ventura County APCD immediately in the vicinity of the Naumann Drillsite (see dashed blue and green line on graph below). Of significance is the fact that for the two toxic compounds that were found to be present in the grab samples taken adjacent to the Naumann Drillsite, benzene and toluene, their concentration is lower than any of the other sampling stations as reported by CARB in southern California. Simply stated, the data shows that the air quality with respect to toxic compounds at the Naumann Drillsite as determined by the grab samples is better than that at any of the recording stations in southern California. The grab samples only represent a snapshot in time, but they certainly provide a data point where none was available before.



8.0 Misuse of CalEnviroScreen 3.0

The Appellants' principal issue with the Ventura County Planning staff's approval of the permit modifications appears to stem from staff's CEQA review and its adoption of a mitigated negative declaration environmental document for the project. The Appellants, based on their interpretation of CalEPA's CalEnviroScreen 3.0 tool, are advocating for an environmental impact report in order to address the potential risks to a "disadvantaged community" where Appellants have stated "... 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." CEQA does not differentiate between the socio-economic status of a community in the application of an environmental review. CEQA review identifies all potentially significant environmental impacts of a project. The Appellants misrepresent CalEnviroScreen 3.0 as a proxy for CEQA.

Furthermore, not only is CalEnviroScreen 3.0 the wrong tool for CEQA review, the data it is based upon contains serious errors, some of which are detailed below beginning in Section 8.1.

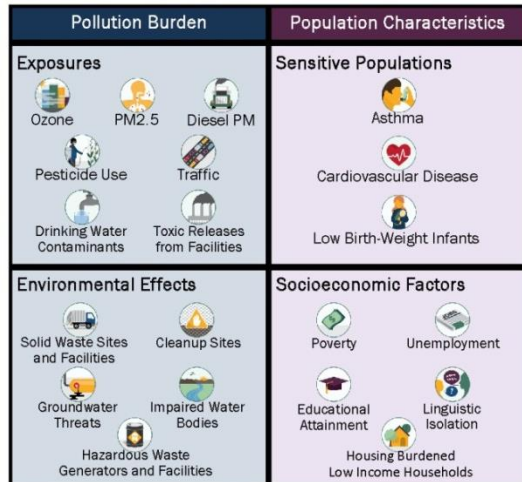
CalEPA has provided guidance and a disclaimer regarding CalEnviroScreen, excerpts of which are quoted below:

- “The tool’s output provides a relative ranking of communities based on a selected group of datasets, through the use of a summary score. The CalEnviroScreen is not an expression of health risk, and does not provide quantitative information on increases in cumulative impacts for specific sites or projects. Further, as a comparative screening tool, the results do not provide a basis for determining when differences between scores are significant in relation to public health or the environment. Accordingly, the tool is not intended to be used as a health or ecological risk assessment for a specific area or site.”
- “During the initial consideration and adoption of CalEnviroScreen, concerns were raised about its potential for misuse. To ensure proper use and understanding we explained that the tool is not a substitute for a cumulative impacts analysis under CEQA. Nor is the intent to restrict the authority of government agencies in permit and land use decisions.”

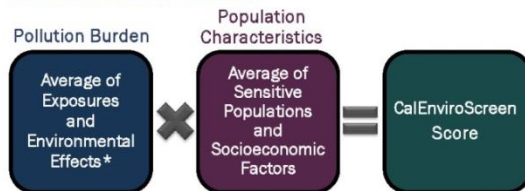
For additional reference, see “CalEnviroScreen 3.0 – Still the Wrong Tool for CEQA Review” (<https://www.pillsburylaw.com/images/content/1/1/110135.pdf>)

CalEnviroScreen was developed by the CalEPA and the California Office of Environmental Health Hazard Assessment (OEHHA) for the purpose of identifying “disadvantaged communities” so that a portion of the proceeds collected from the State’s cap-and-trade program administered by CARB could be targeted specifically to programs that would serve disadvantaged communities. CalEnviroScreen is a statewide “science-based” mapping tool used to identify communities that are the most affected by many sources of pollution, and which are vulnerable to pollution’s effects. CalEnviroScreen uses environmental, health, and socioeconomic information to produce a numerical score for each census tract in the State. The score for each census tract is generated by compiling scores for various pollution burden indicators and population characteristic indicators. Data for each indicator come from a variety of the State’s data bases for individual indicators and is not project based data that has value for a project based CEQA analysis. An algorithm has been established for the generation of each indicator score. The CalEnviroScreen indicators and “formula” are shown below.

Indicators



CalEnviroScreen Formula



A census tract with a high score is one that experiences a higher pollution burden and vulnerability relative to census tracts with low scores. A census tract with a total percentile of 75% or greater is termed a “disadvantaged community.” CalEnviroScreen 3.0 was released in January 2017. The Naumann Drillsite and the Cabrillo Oil Field are located in census tract 6111004704 (CT47.04). A map and an image of the CT47.04 are shown below on which the locations of the Naumann Drillsite, Rosenmund Drillsite and city limits of Oxnard are shown.



From 2010 census data the total population of CT 47.04 was 1,469. Of those counted, 1,147 are within the Oxnard city limits which involves two mobile home parks located just inside the western boundary of CT 47.04.

CalEnviroScreen 3.0 includes 12 pollution burden characteristics and 8 population characteristics. The scoring for CT4704 is provided below. With a percentile score of 77.34%, CT 47.04 is categorized as a “disadvantaged community” because its total percentile score is greater than 75%.

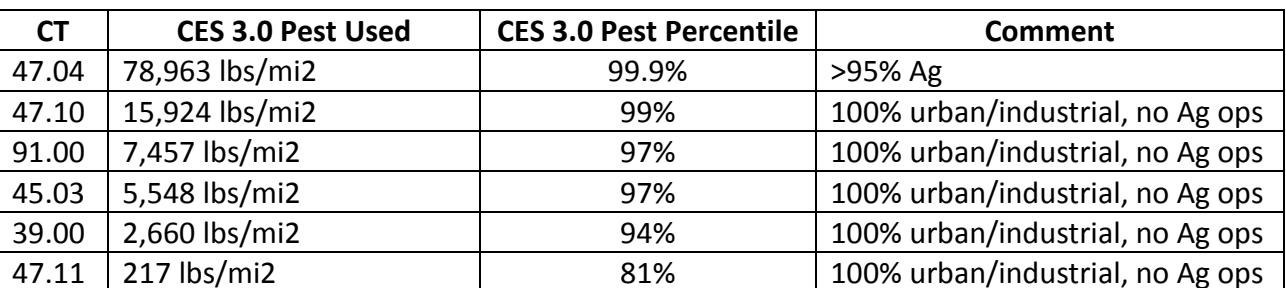
CalEnviroScreen 3.0 Census Tract 6111004704 (CT 47.04)				
Census Tract 6111004704				CES 3.0
Pollution Burden		Percentile	Percentile	Percentile
Exposure Indicator	Pesticide Use	99.97	90.98	77.34
Environmental Effects Indicators	Impaired Water Bodies	97.26		
Exposure Indicator	Drinking Water Contaminants	87.16		
Environmental Effects Indicators	Hazardous Waste Generators and Facilities	71.55		
Environmental Effects Indicators	Solid Waste Sites and Facilities	68.47		
Environmental Effects Indicators	Groundwater Threats	67.64		
Exposure Indicator	Toxic Releases from Facilities	48.68		
Exposure Indicator	Air Quality: PM2.5	40.92		
Exposure Indicator	Air Quality: Ozone	40.49		
Environmental Effects Indicators	Cleanup Sites	39.00		
Exposure Indicator	Diesel Particulate Matter	36.09		
Exposure Indicator	Traffic Density	31.71		
Population Characteristics		Percentile	Percentile	
Socioeconomic Factor Indicators	Educational Attainment	93.49	55.42	
Socioeconomic Factor Indicators	Linguistic Isolation	91.92		
Socioeconomic Factor Indicators	Poverty	68.98		
Socioeconomic Factor Indicators	Unemployment	56.83		
Sensitive population Indicators	Low Birth Weight Infants	44.60		
Sensitive population Indicators	Asthma	30.69		
Sensitive population Indicators	Cardiovascular Disease	27.69		
Socioeconomic Factor Indicators	Housing Burden Low Income Households	NA		

The following sub-sections provide findings with respect to the top six pollution characteristics which were critical to the development of a pollution score percentile of 90.98% which significantly impacts the overall scoring of CT 47.04 and is the root cause of its overall score of 77.24%, which, being greater than 75%, classifies it as a disadvantaged community in accordance with CalEnviroScreen 3.0.

8.1 Pesticides

The pesticide score for CT 47.04 is 99.97 % which classifies it as one of the most heavily burdened areas with respect to the use of the volume of pesticides in the State. As shown on the image above, CT 47.04 is largely dedicated to agriculture. Specifically those agricultural operations have in the past utilized a high volume of chemicals for the treatment of soil and for the treatment of high valued crops such as strawberries. The pesticide scoring for CalEnviroScreen 3.0 is based on annual averages of pounds of chemical applied to the area as reported by the local Agricultural Commission. The Agricultural Commission office reports the information by section-township-range to the Department of Pesticide Regulation (DPR). CalEnviroScreen 3.0 relies on the DPR data base to determine a weighted average amount of pesticide to apply to each census tract. Taken on face value, the high value for CT 47.04 can be rationalized as that tract

The map below shows five urban census tracts that are within the city limits of Oxnard. The pesticide percentile ranking for each tract is also provided on the map. These tracts are 100% urban and no pesticides should be allocated to their location,... but they are.



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The reporting of the pesticide data for this area, including CT 47.04, is questionable at best given the findings as discussed above. This finding is a critical factor in the determination of the pollution burden scoring for Oxnard area census tracts, and the results need to be considered suspicious for all of the areas mentioned above until the critical question is adequately answered.

8.2 Impaired Water Ways

Impaired water way No. 1 is a drainage ditch. Impaired water way No. 2 is a concrete lined and fenced portion of the flood controlled Revlon Slough. A picture of each of these taken within CT 47.04 is shown below.



Impaired water body No.1 impacting the CalEnviroScreen 3.0 Pollution Score for CT 47.04, looking north, crossing with Etting Road.



Impaired water body No.2 impacting the CalEnviroScreen 3.0 Pollution Score for CT 47.04, looking south, Revlon Slough crossing with Pleasant valley Road.

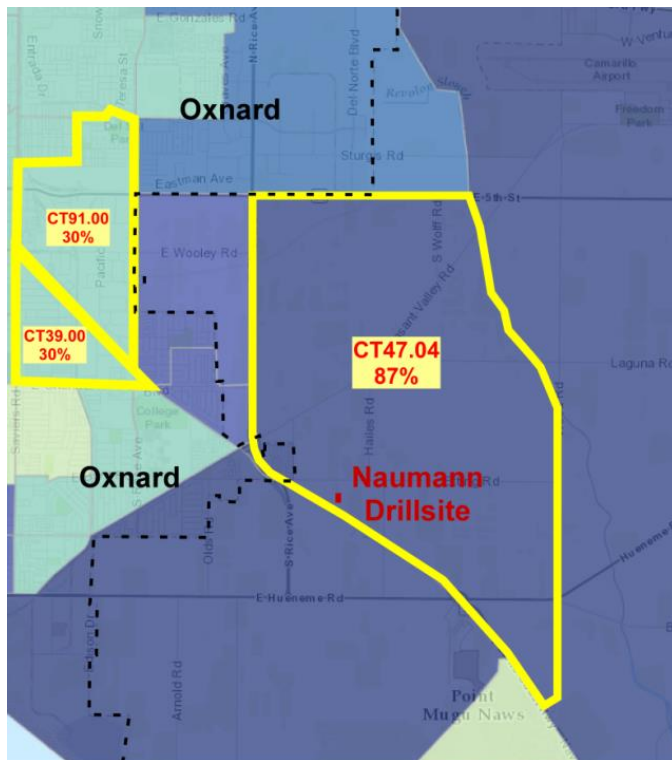
It is obvious. These two “impaired” water ways in CT 47.04 do not provide beneficial uses to the residents of CT 47.04 for drinking, swimming, subsistence fishing, or aquatic life protection. This inconsistency and the inclusion into the pollution burden scoring for CT 47.04 was brought to the attention of the CalEnviroScreen 3.0 staff. Their response was that these water ways were defined as “streams” in the California state water resources control board data base. Rivers and streams include both drainage ditches and flood control channels. CalEnviroScreen 3.0 staff recognized the issue of including such drainage ditches and flood control channels as “water ways” in the analysis. The inconsistency was duly noted and CalEnviroScreen staff will consider modifying the mapping system in future versions to exclude drainage ditches. Meanwhile, the CalEnviroScreen 3.0 pollution burden scoring of impaired waterways for CT 47.04 is negatively impacted by this obvious mischaracterization of this pollution effect.

CalEnviroScreen data is unreliable for any project level CEQA analysis. Cal EPA has even noted that CalEnviroScreen is not a tool to be used for CEQA review of local projects and permitting decisions.

8.3 Drinking Water Contaminants

The drinking water contaminants score for CT 47.04 is 87.16%. The drinking water contaminants score for a specific census tract is derived from a population weighted summation of the suite of contaminant scores for each census block within the census track. The water supply is assumed to be a public water system if a public water system is available. If a public water system is not available the default is to private wells. There are issues with private wells. Private well contaminant data is not readily available and well locations are confidential. Because of this, contaminant data where a water system is not available is assigned to each township (6 miles by 6 miles) as defined by the SWRCB in the public mapping system.

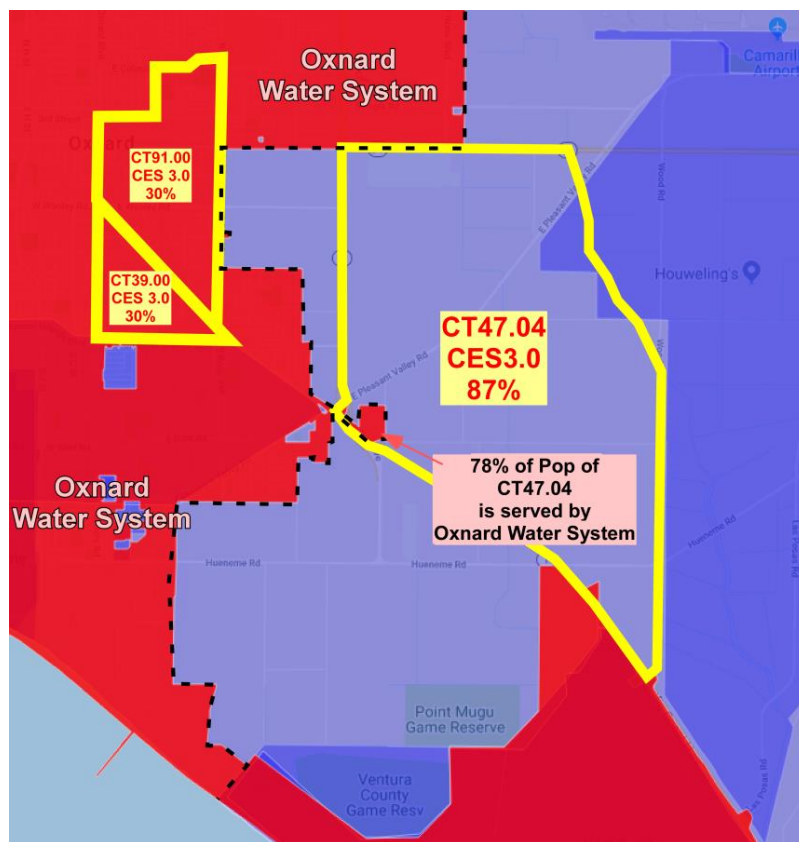
The map below is of the CalEnviroScreen 3.0 drinking water contaminants scores centered on CT 47.04. It shows CT 47.04 and its score of 87%. Also shown on the map are CT 91.00 with its score of 30% and CT 39.00 which also has a score of 30%. Water quality is improving to the west, away from CT 47.04, towards the city of Oxnard.



CT 47.04 is serviced by three public water systems. They are: the Oxnard Water District shown in red on the map below; the United Water Conservation District (UWCD) shown in light lavender on the map below; and the Pleasant Valley Water District (PVWD) shown in dark blue on the map below. 78% of the population of CT 47.04 is located in the small area indicted in red on the map below inside of CT 47.04. That area is within the city limits of Oxnard and includes 1,147 people out of a total of 1,469 people that live in census tract CT 47.04 as determined by the 2010 census. The Oxnard city residents that live within the boundary of CT 47.04 receive water from the Oxnard Water System.

The location of CalEnviroScreen 3.0 CTs 39.00 and 91.00, both of which are located entirely within the city limits of Oxnard, and the location of subject CT 47.04 are shown on the map above and the map below. Notice the disparity between the three census tracts' drinking water contaminant scores. The drinking water contaminant scores for CTs 39.00 and 91.00 are "good", whereas the score for CT 47.04 is poor. Because 78% of the population of CT 47.04 receives it water from the Oxnard Water System, the same system that is providing water to CTs 39.00 and 91.00, it is reasonable to expect that the water quality for the CT 47.04 would be weighted in the "good" direction. In fact, just the opposite is true. This implies one of two things. First, that there is a second drinking water source system allocated to CT 47.04 that is servicing the remaining 22% of the population of CT 47.04 and that this second source is either from groundwater or one of the other two water systems servicing CT 47.04 and that, in either case, that water has extremely poor quality with respect to drinking water contaminants. However, sourcing from a different public water system is not possible. Both the UWCD and PVWD public water systems

do not deliver potable water to residents of CT 47.04. The only water that these systems deliver to CT 47.04 is irrigation water. By default then, the secondary source of water for the 22% of the population of CT 47.04 that does not receive their water from the Oxnard Water District must be groundwater. The issues concerning groundwater data and CalEnviroScreen were discussed in the first paragraph of this section. Certainly the data is suspicious. Unfortunately CalEnviroScreen 3.0 is not transparent so the opportunity to readily investigate these types of inconsistencies is nearly impossible without making a specific inquiry to CalEnviroScreen. CalEnviroScreen 3.0 implies that such inconsistencies as noted above occur as it states in its statement concerning drinking water contaminants that “*Certain assumptions, data gaps and limitation within the indicator score methodology may affect the calculations of scores.*”



The overwhelming majority of residents of CT 47.04, those that are living within the city limits of Oxnard, are receiving water from the Oxnard Water System which from the nearby census tracts can be classified as being “good” quality. The drinking water contaminant scoring for CT 47.04 is suspect, as discussed above, and it has a significant impact on the pollution burden scoring of CT 47.04 and the CT’s overall percentile ranking for CalEnviroScreen 3.0.

CalEnviroScreen data is unreliable for any project level CEQA analysis. Cal EPA has even noted that CalEnviroScreen is not a tool to be used for CEQA review of local projects and permitting decisions.

The hazardous waste generators and facilities score for CT 47.04 is 72%. The map below shows the hazardous waste generators and facilities scoring for CT 47.04 and adjacent census tracts. The scoring for this environmental effect is such that it takes into account not only those identified hazardous waste generators and facilities within the subject census tract but it takes into account such generators and facilities within 1,000 meters of the subject census tract. The zone of influence for CT 47.04 is shown as a dashed yellow line on the map below.

The map displays the Naumann Drillsite area in Oxnard, California. A yellow boundary line outlines the primary area of interest. Various streets are labeled, including N.R., Graves Ave., Del Sol Park, Eastman Ave., E Wibley Rd, E Channel Island Blvd, E Bard Rd, Arnold Rd, E Huemene Rd, S Wolf Rd, Pleasant Valley Rd, Halles Rd, and Point Mugu. Parks such as Del Sol Park, College Park, and Freedom Park are also indicated. Percentages are scattered across the map, likely representing different data points or survey results. The 'Naumann Drillsite' is specifically marked in red text.

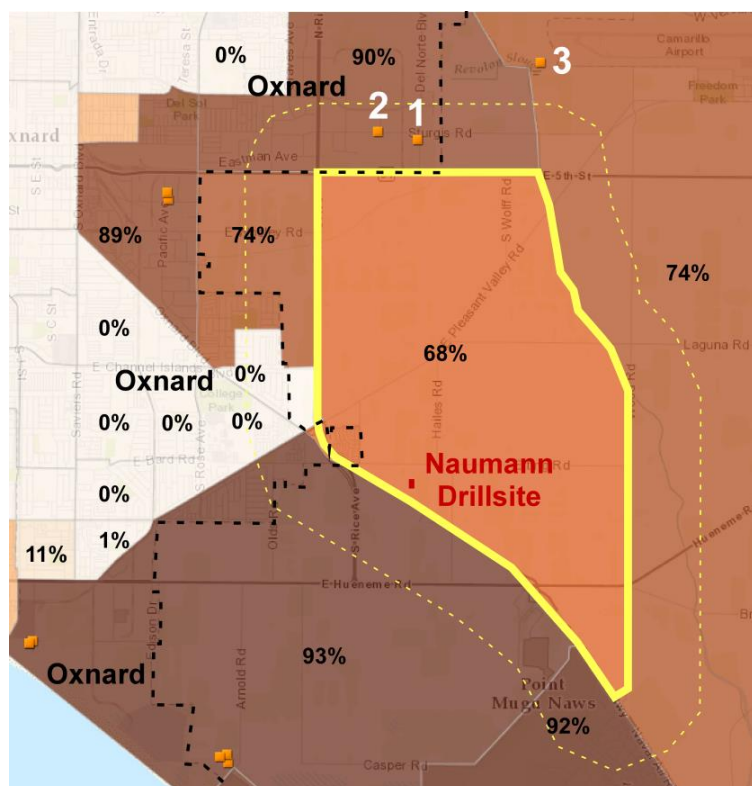
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Facility	Name	Street	Gen EPA	Tons/Year HW		
				2012	2013	2014
1	PARKER HANNIFIN CORP.	Eastman	CAD983637570	7.63	7.65	14.85
2	CITY OF OXNARD-REFUSE DIVISION	Del Norte	CAH111000535	40.99	32.22	24.64
3	ELITE METAL FINISHING, L.L.C.	Camino del Sol	CAL000203294	30.51	34.74	26.27
4	VINTAGE PRODUCTION CA LLC	5th	CAL000374012	16.87	0.00	0.00
5	HAAS AUTOMATION	Sturgis	CAR000017749	212.76	152.79	145.35
6	SEMINIS VEGETABLE SEEDS, INC.	Camino del Sol	CAR000213934	8.74	15.63	520.60

CalEnviroScreen data is unreliable for any project level CEQA analysis. Cal EPA has even noted that CalEnviroScreen is not a tool to be used for CEQA review of local projects and permitting decisions.

8.5 Solid Waste Sites & Facilities

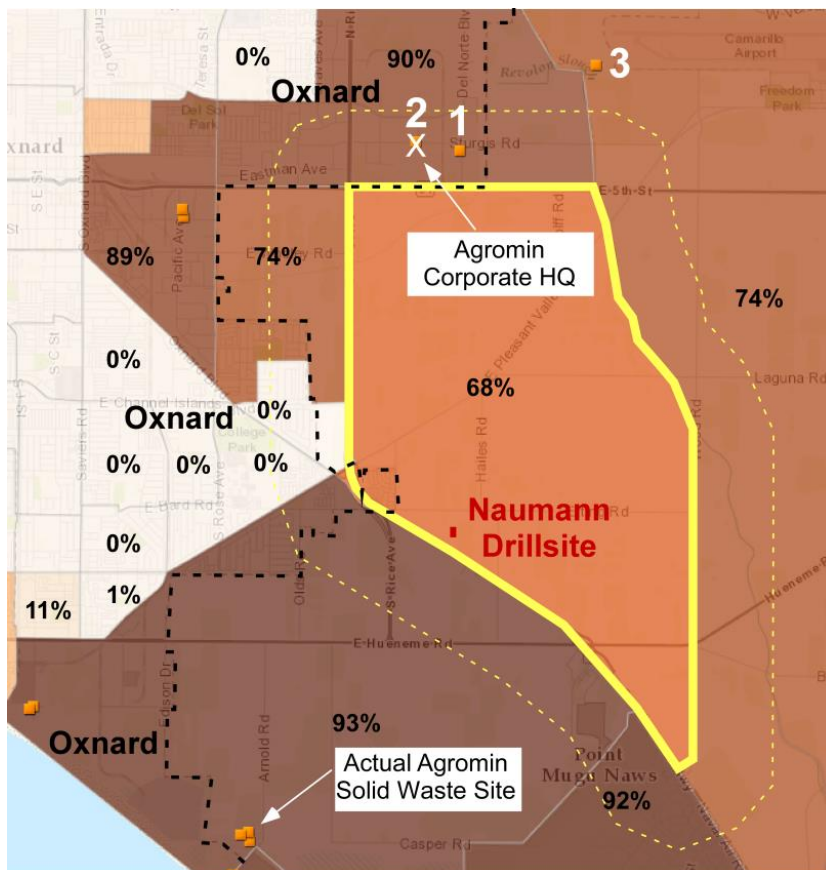
The solid waste sites and facilities score for CT 47.04 is 68.47%. The map below shows the solid waste sites and facilities scoring for CT 47.04 and adjacent census tracts. The scoring for this environmental effect is such that it takes into account not only identified solid waste sites and facilities within the subject census tract, of which there are none, but it also takes into account such sites and facilities within 2,000 meters of the subject census tract. The CalEnviroScreen 3.0 map for solid waste sites & facilities is shown below. The 1,000 meter zone of influence for CT 47.04 is shown as a dashed yellow line around the CT 47.04.



There are no solid waste sites and facilities in CT 47.04. There are two that are identified within the 1,000 meter buffer area and one within the 2,000m buffer zone. The facilities that impact the scoring of CT 47.04 are provided in the spreadsheet below and shown on the map as “1”, “2”, and “3” corresponding to the spreadsheet facility number below.

Facility	Name	Street	Permit	Facility Type	Comment
1	CITY OF OXNARD-REFUSE DIVISION	Del Norte	56-AA-0128	5	Solid Waste Processing
2	AGROMIN	Kinetic Drive			Agromin corporate headquarters, retail ops only, no solid waste processing
3	McGrath Farm	N/A	56-AA-0156	2	Composting

Our research determined that the facility #2 on the spreadsheet above, Agromin, is not a solid waste site. It is the corporate offices of Agromin. This was determined after discussions with Agromin, CalEnviroScreen staff and CalRecycle staff. As shown below, even though the Agromin site is located outside of CT 47.04, the incorrect coding of this location as a solid waste facility negatively impacts the pollution burden scoring of CT 47.04 because the location is within the buffer zone.



This data base error was brought first to the attention of Cal Recycle who confirmed that the data tagged as the Agromin Kinetic Drive facility should have been tagged to an Agromin facility located on Arnold Road, which is located several miles southwest of CT 47.04 and completely beyond any CT 47.04 buffer zone as shown on the map above. These findings were forwarded on

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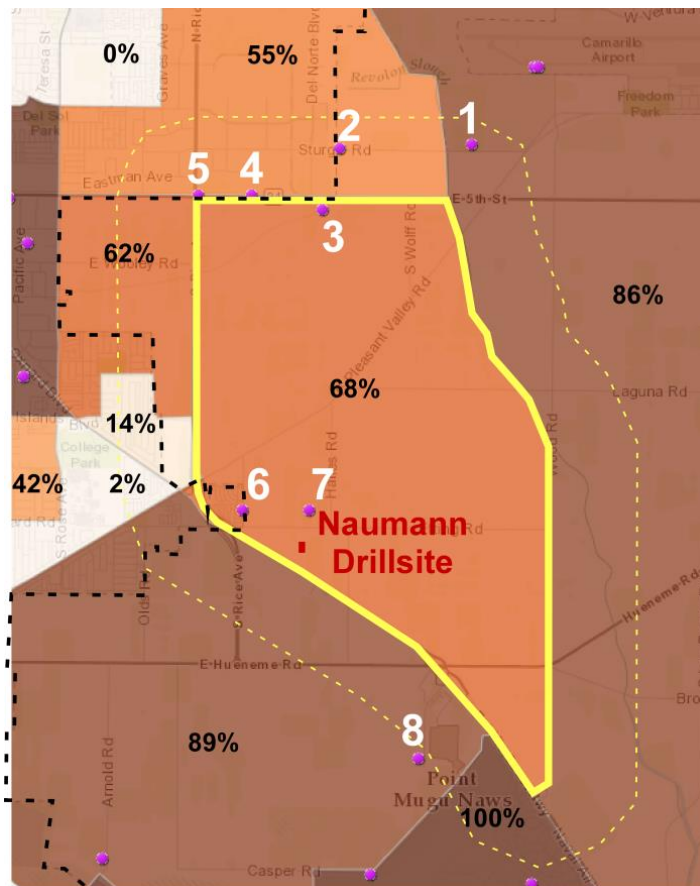
to the CalEnviroScreen 3.0 staff who stated that they would “...investigate the facilities brought into question during our indicator development period as we develop CES 4.0. We will not make any retroactive changes to the CES 3.0 data that has been provided to us by CalRecycle.” In the meantime, the CalEnviroScreen pollution burden scoring for solid waste sites for CT 47.04 is incorrectly stated as a result of this error.

CalEnviroScreen data is unreliable for any project level CEQA analysis. Cal EPA has even noted that CalEnviroScreen is not a tool to be used for CEQA review of local projects and permitting decisions.

8.6 Groundwater Threats

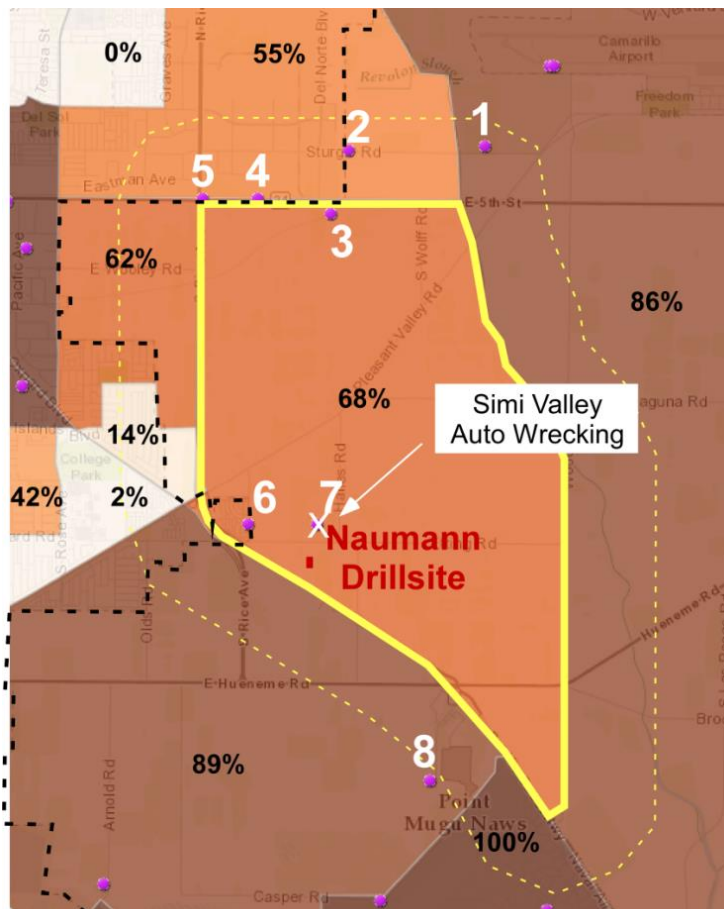
The groundwater threats score for CT 47.04 is 67.64%. Groundwater threats are those that pose threats to groundwater quality and they include the storage and disposal of hazardous materials on land and in underground storage tanks at various types of commercial, industrial, and military sites. The data base used by CalEnviroScreen 3.0 to evaluate groundwater threats comes from state water resources control board’s GeoTracker database.

The CalEnviroScreen 3.0 map for groundwater threats is shown below. The 1,000 meter zone of influence for CT 47.04 is shown as a dashed yellow line around the CT 47.04.



CalEnviroScreen 3.0 identified a total of 8 groundwater threats that were within the 1,000m buffer zone around CT 47.04. Those eight are shown on the map above and listed on the spreadsheet below. Of significance to RenPet was #7, which, as reported in CalEnviroScreen 3.0, was located immediately north of the Naumann Drillsite. This alleged groundwater threat location designated as the Simi Valley Auto Wrecking **does not exist** and there are no known records to indicate that it has ever existed at the designated location. The matter was brought to the attention of the CalEnviroScreen 3.0 group and to the state water resources control board. The water board immediately investigated the report and updated its GeoTracker data base to purge CT 47.04 of the Simi Valley Auto Wrecking facility.

CT	Site	Name	Comment
56.00	1	Vaca Energy	
49.02	2	Shell-Todd Fee Lease	
47.04	3	Oxnard Refinery	
49.02	4	UPRC	
49.02	5	William Lenox Trust	
47.04	6	Golden Coast Nurseries	
47.04	7	Simi Valley Auto Wrecking	Wrong Location!
47.15	8	Dept of Defense	



The map above shows the falsely allocated location of Simi Valley Auto Wrecking within CT 47.04. Even though the state water control board and CalEnviroScreen staffs acknowledge this data base error, no action has been taken to correct matters in CalEnviroScreen. Its staff compiles known errors to remedy in advance of the next release. In the meantime, the CalEnviroScreen pollution burden scoring for groundwater threats for CT 47.04 is incorrectly stated as a result of this error.

CalEnviroScreen data is unreliable for any project level CEQA analysis. Cal EPA has even cautioned that CalEnviroScreen is not a tool to be used for CEQA review of local projects and permitting decisions.

8.7 CalEnviroScreen Take-A-Ways

The analysis provided above shows that CalEnviroScreen is fraught with errors. It was never intended to be used as a proxy for CEQA. It may be an adequate tool to use for its original intended purpose, which was to provide a ranked method to identify communities where a portion of the CARB cap-and-trade funds could be prioritized to benefit “disadvantaged communities,” however, as a proxy for CEQA, it is flawed tool, has extreme limitations, is not a scientific project level analysis, and should be used with caution by policy makers. CEQA law has not changed and CalEnviroScreen remains the wrong tool for environmental review of local projects and permitting decisions.

9.0 Ventura County APCD – Health Risk Assessment

The project does not exceed the Ventura County adopted thresholds of significance to require a health risk assessment. In 2018 the Ventura County APCD voluntarily performed a series of health risk studies focused on the subject Naumann Drillsite, which operates under APCD permit to operate PTO-1383. The first study was a health risk representation using facility prioritization procedures. The second was a health risk assessment. It is notable that the latter was performed even though the scoring of the former did not meet the threshold to require a health risk assessment. The health risk assessment was performed at the discretion of the APCD to demonstrate the low level of health risk attributable to the Naumann Drillsite. Both the Health Risk Representation using Facility Prioritization Procedures dated September 28, 2018 (HRRFP) and the Health Risk Assessment dated October 3, 2018 (HRA) were provided to RenPet following a request to the APCD and both are on file with Planning.

The modeling that was performed to generate both the HRRFP and the HRA assessed the facility as proposed to include:

- Total of 5 producing wells,
- Two 1,000 barrel crude oil storage tanks.

The modeling assessed the facility as currently permitted which included:

- 365,000 barrels of oil throughput per year,
- Flaring of 50,200 MMcf of gas per year.

As stated in a memo dated October 4, 2018 from APCD Director Michael Villegas to Planning Director Kim Prillhart, *“the HRA provides results showing the maximum cancer risk is 0.903 in a million (well below the significance threshold of 10 in a million) and the maximum non-cancer hazard index (acute) is 0.123 (well below the significance threshold of 1.0).”*

The Naumann Drillsite HRA results are provided below:

Receptor Location	Lifetime Excess Cancer Risk	Chronic Noncancer Hazard Index	Acute Noncancer Hazard Index
Maximum Workplace (138 m)	0.125 in a million	0.005	0.123
Maximum Nearest Residence (210 m)	0.903 in a million	0.002	0.069
Oxnard Pacific Mobile Estates (570 m)	0.222 in a million	0.0003	0.034

The APCD further states that *“The calculated risk impact due to the proposed project does not exceed the Ventura County Air Quality Assessment Guideline significance thresholds for cancer or non-cancer risk. Therefore, based on the above results, the toxics emissions resulted from this project would not result in a significant adverse impact.”*

The results of the Naumann Drillsite HRA as presented above by the APCD do not represent a chronic or an acute health risk to workers, nearby residents, residents in the city of Oxnard, or schoolchildren in the area, even in an up-scaled model that involves maximum rates of allowable oil production and the maximum volume of gas allowed to be flared.