



Today's recommendation is to direct staff to return with a temporary ordinance for potential adoption and to commence a study of whether new regulations are needed.



No findings are required today. Our Board would consider findings at the time an ordinance is presented by staff.



Several factors support a temporary moratorium while further study is performed.



1) A critical water supply aquifer system that is proposed for substantial new oil production.



2) An antiquated oil production CUP in that critical aquifer area that potentially allows substantial new oil wells without modern conditions, review, or County oversight.



3) A pending proposal for 79 new oil wells without discretionary review using an extraction technique, steam injection, which increases risks.



4) A USGS study which found methane with a petroleum signature in this critical aquifer in the vicinity of steam injection wells. Additional study from USGS is pending

USGS Study

Summary of Results

Oil/Gas fluids in Groundwater:

- Deep brine signatures not detected in wells overlying oil field
- Thermogenic gases detected in 2 wells overlying the oil field (possibly present in a 3rd well)
- Thermogenic gases occurred in deep groundwater wells, with the highest concentration associated with relatively high density of oil wells, large injection volumes, and shallow oil development
- Thermogenic gases may result from stray gas movement along preferential pathways such as wells or through the formation
- In the Pleasant Valley area, east of the Oxnard oil field, deep formation brine signatures were detected in 2017 similar to historic data; these detections are related to groundwater overdevelopment rather than oil-field activities



USGS Additional Study Coming

Information gaps and priorities for future monitoring:

- ◆ Further sampling of groundwater wells and oil well casing gases within the area of high density oil development in the Vaca Tar sands to determine sources/pathways of thermogenic gases.



Peak Oil is operating under antiquated CUPs which predated CEQA. A 1979 EIR for a different, expired CUP is not applicable.



The letter inaccurately states that Peak's proposed project was studied in a 1979 EIR. That project was not timely implemented and the underlying CUP has long since expired.

Email from Jeffrey Barnes, County Counsel

April 8, 2019



Peak is NOT proposing to operate under that expired CUP. Instead, it is proposing to operate under an antiquated CUP that predated CEQA. Bottom line: Peak's pending proposal has not undergone CEQA review and the 1979 EIR does not apply to the proposal.

Email from Jeffrey Barnes, County Counsel

April 8, 2019



Appropriate analysis would not be done for the Peak expansion without new regulations.