

EXHIBIT 4b

Planning Director Staff Report

January 8, 2015

Planning Commission Staff Report June 11, 2015

CRC Oil and Gas Project
Case No. PL13-0150

Exhibit 4b:

Planning Director Staff Report dated January 8, 2015



Planning Director Staff Report – Hearing on January 8, 2015

County of Ventura • Resource Management Agency • Planning Division

800 S. Victoria Avenue, Ventura, CA 93009-1740 • (805) 654-2478 • ventura.org/rma/planning

VINTAGE PRODUCTION OIL AND GAS FACILITY Case No. PL13-0150

A. PROJECT INFORMATION

1. **Request:** The applicant requests that a Minor Modification of Conditional Use Permit 3344 be granted to authorize the continued operation of 17 oil and gas wells and related production facilities and the drilling of 19 new oil and gas wells. (Case No. PL13-0150).
2. **Applicant/Property Owner:** Vintage Production California, LLC, Attention: Jim Robinson, 9600 Ming Avenue, Suite 300, Bakersfield, California 93311
3. **Applicant's Representative:** InterAct, Attention: Uliana Micovic, 4567 Telephone Road, Suite 203, Ventura, California 93003
4. **Decision-Making Authority:** Pursuant to the Ventura County Non-Coastal Zoning Ordinance (§8105-4 and §8111-1.2 et seq.), the Planning Director is the decision-maker for the requested Conditional Use Permit.
5. **Project Site Location and Parcel Number:** The project site is located in a mountainous region north of the City of Santa Paula and east of Thomas Aquinas College, 10,000 Ojai-Santa Paula Road, Santa Paula, in the unincorporated area of Ventura County. The Tax Assessor's parcel numbers for the parcels that constitute the project site are 040-0-010-260, 040-0-210-080, 040-0-210-200, 040-0-060-055, and 040-0-210-070 (Exhibit 2).
6. **Project Site Land Use and Zoning Designations (Exhibit 2):**
 - a. Countywide General Plan Land Use Map Designation: Open Space and Agricultural
 - b. Zoning Designation: "OS-160 ac" (Open Space, 160 acre minimum lot size) and "AE-40 ac" (Agricultural Exclusive, 40 acre minimum lot size)
7. **Adjacent Zoning and Land Uses/Development (Exhibit 2):**

Location in Relation to the Project Site	Zoning	Land Uses/Development
North	OS-160 ac	Undeveloped, Los Padres Forest

Location in Relation to the Project Site	Zoning	Land Uses/Development
South	OS-160 ac	Ojai-Santa Paula Road, oil fields
East	OS-160 ac	Undeveloped, Los Padres Forest
West	OS-160 ac	Thomas Aquinas College, agricultural production, oil fields

8. History: The subject property has been developed with oil and gas facilities that were authorized by CUP 3344. The permit history of CUP 3344 includes the following:

- In 1971, the Planning Commission granted CUP 3344 for oil exploration and production. CUP 3344 was granted to authorize one well, and authorized the Planning Director to authorize additional wells.
- In 1973, the Planning Director granted a modification of CUP 3344 (CUP 3344 Mod 1) to authorize one additional well (for a total of two wells).
- In 1976, the Planning Commission granted a modification of CUP 3344 (CUP 3344 Mod 2) to drill four additional wells (for a total of six wells).
- In 1978, the Planning Commission granted a modification of CUP 3344 (CUP 3344 Mod 3) to drill 30 additional wells (for a total of 36 wells).
- In 1980, the Planning Director granted a modification of CUP 3344 (CUP 3344 Mod 4) for a time extension to the requirement to install a pipeline.
- In 1980, the Planning Director granted a modification of CUP 3344 (CUP 3344 Mod 5) to transfer the location of one of the permitted wells.
- In 1981, the Planning Director granted a modification of CUP 3344 (CUP 3344 Mod 6) to transfer the location of one of the permitted wells.
- In 1982, the Planning Director granted a modification of CUP 3344 (CUP 3344 Mod 7) to authorize an oil pipeline route and modify the requirement to install a pipeline.
- In 1982, the Planning Director granted a modification of CUP 3344 (CUP 3344 Mod 9) to transfer the location of two of the permitted wells.
- In 1982, the Permittee submitted an application for a modification of CUP 3344 (CUP Mod 10) to authorize a new access road. The proposed project

was incorporated into the pending application (CUP 3344 Mod 8), and CUP Mod 10 was withdrawn.

- In 1983, the Planning Director granted a modification of CUP 3344 (CUP 3344 Mod 11) to authorize the installation of a gas pipeline.
- In 1985, the Board of Supervisors approved a modification of CUP 3344 (CUP 3344 Mod 8 and 9) to allow the continued use of 14 wells and 22 additional wells (for a total of 36 wells).
- In 1989, the Planning Director granted a permit adjustment to CUP 3344 (CUP 3344 Mod 10) to authorize the continued use of 14 existing wells and 22 additional wells (for a total of 36 wells).
- In 1991, the Planning Director approved a modification of CUP 3344 (CUP 3344 Mod 12) to allow a time extension to the drilling phase of the permit.
- In 1997, the Planning Director granted a modification of CUP 3344 (CUP 3344 Mod 11) to extend the drilling period of the permitted wells.
- In 2013, the applicant submitted the current application to modify CUP 3344.

9. Project Description: The applicant requests that a modified CUP be granted to authorize additional oil and gas exploration and production activities within an existing oil field. The proposed project includes the following components:

- a. The drilling, testing, reworking, maintenance and placement into production of 19 new oil and gas wells on four existing drilling pads (Drill Sites 1, 2, 3 and 7).
- b. The continued operation of 17 existing oil and gas wells located on four existing drilling pads (Drill Sites 1, 2, 3 and 7). This operation includes well testing, reworking, maintenance and production activities.
- c. Separation of natural gas and produced water from crude oil;
- d. Processing activities required for on-site wastewater injection well operations; and,
- e. Operation of existing equipment associated with the storage, processing, and transportation of oil, gas, and wastewater (brine).
- f. Continued maintenance vehicle trips of 2 per day (4 one-way trips) from Monday through Saturday.

The location of the existing and proposed wells and the associated equipment located in the CUP area used to process, store and transport produced fluids is illustrated on Attachment 2 of the EIR Addendum.

The proposed project does not include any new grading or removal of vegetation. All proposed wells will be drilled on the existing drill pads (Drill Site Nos. 1-3 and 7). The existing oil facilities are accessed by a private gated road connected to State Highway 150 just east of Thomas Aquinas College. In addition to the onsite equipment located on the existing drilling pads, the facility is connected to existing pipelines that are used to transport produced fluids to an offsite facility for separation, storage and transport to market. No new pipelines for the conveyance of produced fluids to the offsite facilities are proposed. Pumping units, gathering lines, electrical connections, produced fluid tanks and ancillary equipment will continue to be used for the operation of the facility.

There is no trucking of oil & gas from the Ferndale lease. Oil and gas produced from wells drilled on the Ferndale lease is conveyed by existing pipeline to the HAMP lease, where the oil, gas and water is separated. The water is disposed of onsite at the HAMP lease, into an existing and approved injection well. The separated gas is conveyed by existing pipeline by way of the Shiells Canyon Plant and then via existing pipeline to the Santa Clara Valley Plant where it is ultimately sold into a Southern California Gas pipeline. Separated oil is shipped by existing pipeline from HAMP lease to market via the Crimson pipeline. In summary, all of the oil & gas produced on the Ferndale lease is conveyed to market by existing pipelines.

In the event of an interruption of pipeline service, produced fluids would be temporarily delivered to market by truck subject to the limitations specified in the conditions of approval of the requested CUP.

The existing equipment on the Drill Site No. 1 pad includes the following:

- Two crude oil LACT tanks (1,000 barrel capacity each)
- Two produced water tanks (1,000 barrel capacity each)
- One produced water tank (300 barrel capacity)
- One heater treater
- One vapor recovery compressor (electric)
- One gas dehydration unit
- One water filtration unit (includes backwash filter)
- One water reinjection pump
- Two 64 square foot covered sumps (approximately 300 barrel capacity each)
- One storage tank (approximately 150 barrel capacity)
- Five rod pumping units
- Eight oil and gas wells: Barker Ferndale 1, 2, 3, 4, 5, 6, Valex Ferndale 107 and 110

The existing equipment on the Drill Site No. 2 pad includes the following:

- Three rod pumping units
- Four oil and gas wells: Valex Ferndale 209, 211, 214, 215

The existing equipment on the Drill Site No. 3 pad includes the following:

- One rod pumping unit
- Two oil and gas wells: Valex Ferndale 313, and Ferndale 8

The existing equipment on the Drill Site No. 7 pad includes the following:

- Two rod pumping units
- Three oil and gas wells: Ferndale 712, 716, and 717

Hydraulic fracturing or acid well stimulation techniques subject to the draft regulations for the implementation of Senate Bill 4 are not authorized by this permit. Any such well stimulation activity requires the granting of a modification of this permit by the County of Ventura.

B. CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) COMPLIANCE

On July 9, 1985 the Board of Supervisors certified a focused Environmental Impact Report (EIR) that evaluated the environmental impacts of the project. The EIR evaluated the impacts of additional grading to expand two drill pads and create a new drill pad, relocate the previously permitted oil wells, drilling additional oil and gas wells, and access to the oil facilities. The project evaluated in the certified EIR and approved by the County of Ventura includes a total of 36 oil and gas wells.

The proposed project is comprised of the continued use of the existing oil and gas facilities, including the 17 existing oil and gas wells, and the drilling of the 19 previously authorized oil and gas wells. It does not include any additional grading or expansion of the drill pads. No new substantial environmental impacts that were not evaluated in the previous EIR have been identified for the continued use of the existing permitted wells and facilities and the proposed drilling of the 19 previously-authorized wells. There have been no circumstances identified that warrant substantial changes in the certified EIR. This EIR is attached as Exhibit 4.

The CEQA Guidelines [§ 15164(a)] state that the lead agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary, but none of the conditions described in the CEQA Guidelines (§ 15162) calling for the preparation of a subsequent EIR have occurred. The attached EIR Addendum (Exhibit 4) includes a description of the changes or additions that are necessary to the EIR and a discussion of

why the conditions described in the CEQA Guidelines which require the preparation of a subsequent EIR do not exist.

Based on the information provided above and in light of the whole record, staff recommends that the decision-maker find there is no substantial evidence to warrant the preparation of a subsequent EIR, the Addendum to the EIR (Exhibit 4) satisfies the environmental review requirements of CEQA, and the Addendum reflects the County's independent judgment and analysis.

C. CONSISTENCY WITH THE GENERAL PLAN

The Ventura County General Plan *Goals, Policies and Programs* (April 6, 2010, Edition, page 4) states:

...in the unincorporated area of Ventura County, zoning and any permits issued thereunder, any subdivision of land, any public works project, any public (County, Special District, or Local Government) land acquisition or disposition, and any specific plan, must be consistent with the Ventura County General Plan Goals, Policies and Programs, and where applicable, the adopted Area Plan.

Furthermore, the Ventura County Non-Coastal Zoning Ordinance § 8111-1.2.1.1.a states that in order to be approved, a Conditional Use Permit must be found consistent with all applicable policies of the Ventura County General Plan.

The consistency of the proposed project with the applicable policies of the General Plan is evaluated below.

- 1. Resources Policy 1.3.2-4:** *Discretionary development shall not significantly impact the quantity or quality of water resources within watersheds, groundwater recharge areas or groundwater basins.*

The proposed project will use portable toilets during the drilling phase. Any groundwater zones encountered in the wells will be protected by established well construction design standards enforced by DOGGR. Petroleum products will be stored in existing onsite tanks and transported by existing pipelines to other permitted offsite facilities for processing, storage and transport. Other than the new wells, no new storage or processing facilities are proposed. The area of new impervious surfaces will be limited to less than one acre for the concrete foundation and cellar associated with each new well. The location of the subject oil and gas facilities is outside of the boundary of any unconsolidated groundwater basin. No substantial impact on groundwater resources that would result from the proposed project has been identified.

Based on the above discussion, the proposed project will be consistent with Policy 1.3.2-4.

- 2. Resources Policy 1.5.2-1:** *Discretionary development which could potentially impact biological resources shall be evaluated by a qualified biologist to assess impacts and, if necessary, develop mitigation measures.*

The proposed project includes the drilling of 19 previously authorized oil and gas wells on existing drilling pads. The environmental effects of the proposed wells on biological resources is evaluated in the certified EIR. The issue of environmental effects that would result from the current proposal was again reviewed by the Planning Biologist for any potential impacts on biological resources, especially the California condor. The addition of more oil wells on existing pads that already are developed with operating oil wells would not substantially change any potentially adverse effects on condors. However, because the project site is located within a few miles west of the Hopper Mountain Wildlife Refuge condor nesting area, measures to minimize any possible effects on the condors will be imposed on the project as best management practices. The measures were developed by the County based on recommendations made by the U.S. Fish and Wildlife Service and are included in the recommended conditions of approval (Conditions No. 34-36; Exhibit 7). Since the proposed wells will be located entirely on existing drill pads and conditions will be imposed to minimize effects on the California Condor and to protect sensitive and protected species from excessive noise, the Planning Division Biologist has determined the proposed project will not create any substantial new effects on biological resources.

Based on the above discussion, the proposed project will be consistent with Policy 1.1.2-2.

- 3. Resources Policy 1.7.2-1:** *Notwithstanding Policy 1.7.2-2, discretionary development which would significantly degrade visual resources or significantly alter or obscure public views of visual resources shall be prohibited unless no feasible mitigation measures are available and the decision-making body determines there are overriding considerations.*

The proposed project site is located in mountainous terrain in the vicinity of an Eligible State Scenic Highway (i.e. Highway 150). The existing oil and gas facilities are not visible from Highway 150. The proposed 19 wells will be located on existing drilling pads and will not be visible from Highway 150 (Exhibit 5, Photographs). The drill rigs used to install the wells will be visible but are temporary features. The drilling pads are surrounded by hills and are not visible from any public viewing location. Therefore, the proposed project will not significantly degrade visual resources or significantly alter or obscure public views of visual resources.

Based on the above discussion, the proposed project will be consistent with Policy 1.7.2-1.

- 4. Resources Policy 1.8.2-1:** *Discretionary developments shall be assessed for potential paleontological and cultural resource impacts, except when exempt from such requirements by CEQA. Such assessments shall be incorporated into a Countywide paleontological and cultural resource data base.*

The proposed project involves ground disturbance in areas that have been previously disturbed for the original construction of the existing oil and gas facilities. The proposed project will involve minor grading to level the existing pads for the drilling rig and the new pumping equipment. No archaeological or paleontological resources are known to exist on the site. Although the ground disturbance activities are unlikely to encounter or reveal the presence of subsurface cultural resources, it is possible that previously unknown and undocumented subsurface resources may exist on site. Therefore, the proposed project will be subject to conditions of approval to address a discovery made during well construction. If archaeological or paleontological resources are discovered during ground disturbance activities, all activities shall cease until a County-approved consultant evaluates the resources and measures are implemented to recover or protect the identified resource (Exhibit 7, Condition Nos. 19-20).

Based on the above discussion, the proposed project will be consistent with Policy 1.8.2-1.

- 5. Hazards Policy 2.13.2-1:** *All discretionary permits shall be required, as a condition of approval, to provide adequate water supply and access for fire protection and evacuation purposes.*

Hazards Policy 2.13.2-2: *All discretionary permits in fire hazard areas shall be conditioned to include fire-resistant vegetation, cleared firebreaks, or a long-term comprehensive fuel management program as a condition of approval. Fire hazard reduction measures shall be incorporated into the design of any project in a fire hazard area.*

Public Facilities and Services Policy 4.8.2-1: *Discretionary development shall be permitted only if adequate water supply, access and response time for fire protection can be made available.*

The existing oil and gas facility is currently accessed for fire protection and evacuation purposes by a paved road connected to Highway 150. This road will continue to be available with implementation of the proposed project. The proposed project has been reviewed by the Ventura County Fire Protection

District ("VCFPD"). The VCFPD finds that the current access roads are adequate for fire and emergency response. The proposed project will be subject to conditions of approval to ensure that adequate access for fire suppression and emergency response is maintained. (Exhibit 7, Condition Nos. 59-72).

Based on the above discussion, the proposed project will be consistent with Policies 2.13.2-1, 2.13.2-2, and 4.8.2-1.

- 6. Hazards Policy 2.16.2-1:** *All discretionary development shall be reviewed for noise compatibility with surrounding uses. Noise compatibility shall be determined from a consistent set of criteria based on the standards listed below. An acoustical analysis by a qualified acoustical engineer shall be required of discretionary developments involving noise exposure or noise generation in excess of the established standards. The analysis shall provide documentation of existing and projected noise levels at on-site and off-site receptors, and shall recommend noise control measures for mitigating adverse impacts.*
- (1) Noise sensitive uses proposed to be located near highways, truck routes, heavy industrial activities and other relatively continuous noise sources shall incorporate noise control measures so that:*
 - a. Indoor noise levels in habitable rooms do not exceed CNEL 45.*
 - b. Outdoor noise levels do not exceed CNEL 60 or Leq1H of 65 dB(A) during any hour.*
 - (2) Noise sensitive uses proposed to be located near railroads shall incorporate noise control measures so that:*
 - a. Guidelines (1)a. and (1)b. above are adhered to.*
 - b. Outdoor noise levels do not exceed L10 of 60 dB(A).*
 - (3) Noise sensitive uses proposed to be located near airports:*
 - a. Shall be prohibited if they are in a CNEL 65 or greater, noise contour.*
 - b. Shall be permitted in the CNEL 60 to CNEL 65 noise contour area only if means will be taken to ensure interior noise levels of CNEL 45 or less.*
 - (4) Noise generators, proposed to be located near any noise sensitive use, shall incorporate noise control measures so that ongoing outdoor noise levels received by the noise sensitive receptor, measured at the exterior wall of the building, does not exceed any of the following standards:*
 - a. Leq1H of 55dB(A) or ambient noise level plus 3dB(A), whichever is greater, during any hour from 6:00 a.m. to 7:00 p.m.*
 - b. Leq1H of 50dB(A) or ambient noise level plus 3dB(A), whichever is greater, during any hour from 7:00 p.m. to 10:00 p.m.*
 - c. Leq1H of 45dB(A) or ambient noise level plus 3dB(A), whichever is greater, during any hour from 10:00 p.m. to 6:00 a.m.*
- Section 2.16.2(4) is not applicable to increased traffic noise along any of the roads identified within the 2020 Regional Roadway Network (Figure 4.2.3) Public Facilities Appendix of the Ventura County General Plan (see 2.16.2-1(1)). In addition, State and Federal highways, all railroad line operations,*

aircraft in flight, and public utility facilities are noise generators having Federal and State regulations that preempt local regulations.

- (5) Construction noise shall be evaluated and, if necessary, mitigated in accordance with the County Construction Noise Threshold Criteria and Control Plan.*

The proposed project will generate temporary noise from the operation of the drilling rig(s) used to construct the proposed new wells. Long-term noise will be generated by the operation of the pumping units installed on the new wells.

The drilling activity will occur within mountainous terrain that is surrounded by hills. The nearest noise sensitive uses are two residences located within 500 feet of the existing drill pad designated as Drill Site No.1. A noise study was performed to evaluate the impacts of drilling on the ambient noise levels (Exhibit 6, Noise Study). The noise generated from the drilling rig will exceed the County threshold of compatibility for noise. A sound curtain will be required to reduce the offsite noise from the drilling rig to a less than the threshold levels specified in County policy. The proposed project will be subject to conditions of approval to maintain long-term project-related noise levels, as measured at noise sensitive uses, below the threshold levels listed in Policy 2.16.2-1 (Exhibit 7, Condition Nos. 29-31).

Based on the above discussion, the proposed project will be consistent with Policy 2.16.2-1.

- 7. Public Facilities and Services Policy 4.1.2-1:** *Discretionary development shall be conditioned to contribute land, improvements or funds toward the cost of needed public improvements and services related to the proposed development.*

The proposed project will not require public improvements and services related to the development. Therefore, no conditions of approval are required for contributions toward the cost of public improvements.

Based on the above discussion, the proposed project will be consistent with Policy 4.1.2-1.

- 8. Public Facilities and Services Policy 4.1.2-2:** *Development shall only be permitted in those locations where adequate public services are available (functional), under physical construction or will be available in the near future.*

The proposed oil and gas facilities do not require the provision of any additional public services. These facilities do not have the potential to adversely impact public services.

Based on the above discussion, the proposed project will be consistent with Policy 4.1.2-2.

- 9. Resources Policy 1.4.2-4:** *Petroleum exploration and production shall comply with the requirements of the County Zoning Ordinance and standard conditions, and State laws and guidelines relating to oil and gas exploration and production.*

The proposed petroleum exploration and production will be permitted in compliance with the requirements of the *Ventura County Non-Coastal Zoning Ordinance* (see Section D, below) and will be subject to standard conditions of approval for all oil and gas projects (Exhibit 7, Condition Nos. 21-33). The project will also be subject to California State laws related to oil and gas exploration and production (Exhibit 7, Condition No. 14). Therefore, the proposed oil and gas facility will be in compliance with all applicable requirements and laws.

Based on the above discussion, the proposed project will be consistent with Policy 1.4.2-4.

- 10. Resources Policy 1.4.2-5:** *As existing petroleum permits are modified, they shall be conditioned so that production will be subject to appropriate environmental and jurisdictional review.*

The proposed modified Conditional Use Permit will be subject to standard conditions of approval for oil and gas projects (Exhibit 7, Condition Nos. 21-33). The proposed permit modification request has undergone appropriate environmental and jurisdictional review. Any future changes will also be reviewed in accordance with *Ventura County Non-Coastal Zoning Ordinance* regulations (Exhibit 7, Condition No. 3). Therefore, the proposed oil and gas facility will be subject to appropriate review.

Based on the above discussion, the proposed project will be consistent with Policy 1.4.2-5.

D. ZONING ORDINANCE COMPLIANCE

The proposed project is subject to the requirements of the Ventura County Non-Coastal Zoning Ordinance.

Pursuant to the Ventura County Non-Coastal Zoning Ordinance § 8105-4, the proposed use is allowed in the Open Space zone district with the granting of a Conditional Use Permit. Upon the granting of the Conditional Use Permit, the applicant will be in compliance with this requirement.

The proposed project includes the construction and use of buildings and structures that are subject to the development standards of the Ventura County Non-Coastal Zoning Ordinance § 8106-1.1. Table 1 lists the applicable development standards and a description of whether the proposed project complies with the development standards.

Table 1 – Development Standards Consistency Analysis

Type of Requirement	Zoning Ordinance Requirement	Complies?
Minimum Lot Area (Gross)	10 acres	Yes
Maximum Percentage of Building Coverage	5	Yes
Front Setback	20 feet	Yes
Side Setback	10 feet	Yes
Rear Setback	15 feet	Yes
Maximum Building Height	35 feet	Yes

The proposed oil and gas facility is subject to the special use standards of the Ventura County Non-Coastal Zoning Ordinance § 8107-5.6. Table 2 lists the applicable special use standard and a description of whether the proposed project complies with the special use standards.

Table 2 – Special Use Standards Consistency Analysis

Special Use Standard	Complies?
Setbacks	Yes
Drainage Course Obstruction	Yes
Removal of Equipment	Yes
Waste Handling	Yes
Securities	Yes
Dust Prevention and Road Maintenance	Yes
Light Emanation	Yes
Reporting of Accidents	Yes
Painting	Yes
Site Maintenance	Yes
Site Restoration	Yes
Insurance	Yes
Noise Standard	Yes
Preventive Noise Insulation	Yes
Soundproofing Material	Yes
Hours of Well Maintenance	Yes
Limited Drilling Hours	Yes
Signs	Yes
Fencing	Yes
General Standards	Yes
Screening Landscaping	Yes
Inspection, Enforcement and Compatibility Review	Yes

E. CONDITIONAL USE PERMIT FINDINGS AND SUPPORTING EVIDENCE

The Planning Director must make certain findings in order to grant the requested modified conditional use permit pursuant to Section 8111-1.2.1.1 of the Ventura County Non-Coastal Zoning Ordinance. The proposed findings and supporting evidence are as follows:

- 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 § 8111-1.2.1.1.a.**

Based on the information and analysis presented in Sections C and D of this staff report, the finding that 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 can be made.

- 2. The proposed development is compatible with the character of surrounding, legally established development § 8111-1.2.1.1.b.**

The proposed project involves the continued operation of an existing oil and gas facility that includes 17 existing wells with the addition of 19 new oil and gas wells on four existing permitted drilling pads. The project does not involve the creation of any new drilling pads or access roads, or the construction of substantial new ancillary facilities. The project site is located in the Ojai Oil Field in a mountainous area north of State Highway 150. This area has been historically developed with oil and gas wells and production facilities since the 1800s. The surrounding land is used for a educational institution (St. Thomas Aquinas College), agricultural production, and cattle grazing. A condition of approval is included that prevents drilling activities during the months of May and June to avoid potential conflicts with St. Thomas Aquinas College formal events. The oil and gas production facilities will be located in a region that is surrounded by hills and screened from view from any public location. The proposed changes in the existing oil and gas facilities (i.e. the addition of 19 wells) will not create any new substantial effect on the existing uses on the surrounding lands. The existing character of the area will not be substantially altered with implementation of the proposed project.

Based on the above discussion, this finding can be made.

- 3. The proposed development would not be obnoxious or harmful, or impair the utility of neighboring property or uses § 8111-1.2.1.1.c.**

The proposed oil and gas facilities will be located within the mountainous region north of Highway 150. The site is accessed by an existing paved road connected to Highway 150. The proposed project includes the addition of new wells with pumping units on the existing drill pads that are currently developed with permitted oil wells and other production facilities. No substantial grading or

alteration of the oil equipment, tankage or other production facilities will occur as a result of the installation of the new wells. The current land use of an actively operated oil field will not be substantially altered. Furthermore, the proposed project will be subject to conditions of approval to require reporting of all major incidents, maintenance of noise levels in conformance with County noise policy, and handling of hazardous materials in accordance with State and Local regulations (Exhibit 7, Condition Nos. 15-17, 23, 29-31, 53, and 54-55). Given these factors, no aspect of the proposed project has been identified that would be obnoxious or harmful or impair the utility of neighboring property.

Based on the above discussion, this finding can be made.

4. The proposed development would not be detrimental to the public interest, health, safety, convenience, or welfare § 8111-1.2.1.1.d.

The proposed project involves changes in an existing oil and gas facility oil and gas facilities that will not substantially alter the character of the area or have substantial effects on neighboring land or uses. The proposed expanded oil and gas facilities will continue to require only two vehicle trips (4 one-way trips) for facility maintenance each day from Monday through Saturday. The production facility will be unmanned, and will not generate significant long-term noise. The project will be subject to conditions of approval to require that hazardous materials be handled in conformance with County and State regulations (Exhibit 7, Condition Nos. 23 and 53). The project would not result in significant effects on biological resources, including the California condor. No aspect of the proposed project has been identified that would be detrimental to the public interest, health, safety, convenience or welfare.

Based on the above discussion, this finding can be made.

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 § 8111-1.2.1.1.e.

The proposed project will not substantially alter the character of the area. The existing oil production facilities have access from a paved road connected to State Highway 150. The ongoing traffic associated with the oil and gas facilities does not interfere with vehicles that arrive or depart from Thomas Aquinas College. The proposed oil and gas facilities will be compatible with the surrounding open space, agricultural and college uses. Given the rural nature of the area and the agricultural and open space zoning, substantial changes in land use in future are not foreseeable at this time.

Based on the above discussion, this finding can be made.

6. The proposed development will occur on a legal lot § 8111-1.2.1.1f.

The proposed project involves changes to an existing permitted oil and gas production facility. The legal lot status of the property has not been established at this time. However, oil and gas leases are separate and transferrable property rights that are exempt from the requirements of the State Subdivision Map Act. Thus, the production of oil from a subsurface reservoir under the terms of an lease of oil and gas mineral rights does not require a legal lot.

Based on the above discussion, this finding can be made.

F. PLANNING DIRECTOR HEARING NOTICE, PUBLIC COMMENTS, AND JURISDICTIONAL COMMENTS

The Planning Division provided public notice regarding the Planning Director hearing in accordance with the Government Code § 65091, and Ventura County Non-Coastal Zoning Ordinance § 8111-3.1. The Planning Division mailed notice to owners of property within 300 feet of the subject project site and placed a legal ad in the Ventura County Star. As of the date of this document, the Planning Division has not received any comments regarding the proposed project.

The project site is located within the City of Santa Paula's Area of Interest. Therefore, on November 6, 2014, the Planning Division notified the City of Santa Paula of the proposed project and requested the City of Santa Paula to submit any comments that the City might have on the proposed project. On November 17, 2014, the City of Santa Paula reviewed the proposed project and had no comments (Exhibit 7).

G. RECOMMENDED ACTIONS

Based upon the preceding analysis and information provided, Planning Division Staff recommends that the Planning Director take the following actions:

1. **CERTIFY** that the Director has reviewed and considered this staff report and all exhibits thereto, including the proposed Addendum to the EIR (Exhibit 4), and has considered and has considered all comments received during the public comment process;
2. **FIND**, based on the whole of the record before the Planning Director, that there is no substantial evidence that the project will have a significant effect on the environment, that the Environmental Impact Report Addendum satisfies the environmental review requirements of CEQA, and that the Addendum reflects the Planning Director's independent judgment and analysis;

3. **MAKE** the required findings for the granting of a modified conditional use permit based on the substantial evidence presented in Section E of this staff report and the entire record;
4. **GRANT** modified Conditional Use Permit PL13-0150, subject to the attached conditions of approval (Exhibit 7).
5. **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.

The decision of the Planning Director is final unless appealed to the Planning Commission within 10 calendar days after the permit has been approved, conditionally approved or denied (or on the following workday if the 10th day falls on a weekend or holiday). Any aggrieved person may file an appeal of the decision with the Planning Division. The Planning Division shall then set a hearing date before the Planning Commission to review the matter at the earliest convenient date.

If you have any questions concerning the information presented above, please contact Jay Dobrowalski at (805) 654-2498 or via e-mail at jay.dobrowalski@ventura.org.

Prepared by:

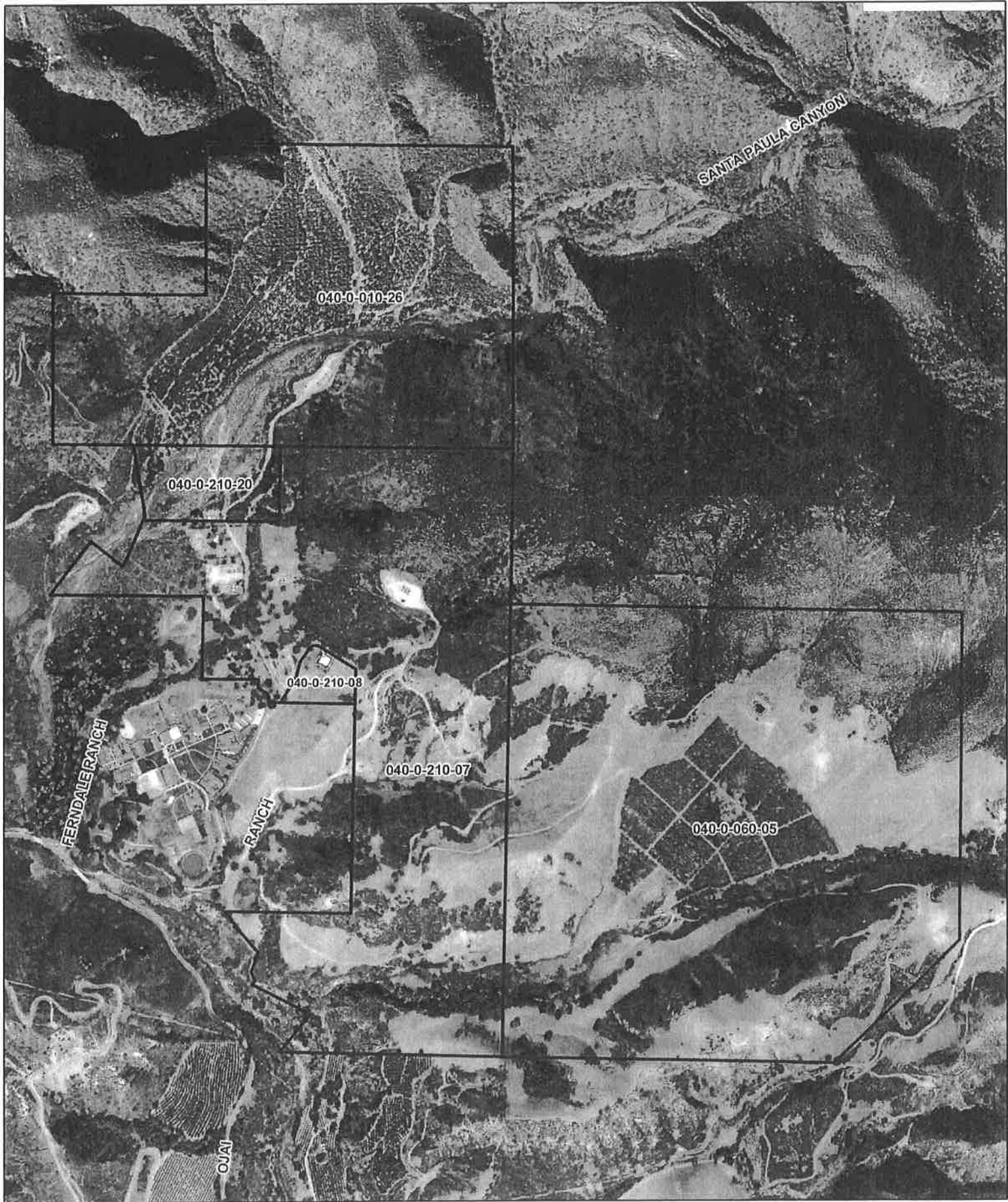
Reviewed by:


Jay Dobrowalski, Case Planner


Brian R. Baca, Manager
Commercial-Industrial Permits Section

EXHIBITS

- Exhibit 2 – Location Map
- Exhibit 3 – Detailed Project Description
- Exhibit 4 – CUP 3344 Environmental Impact Report and Addendum
- Exhibit 5 – Photographs
- Exhibit 6 – Noise Study
- Exhibit 7 – Conditions of Approval
- Exhibit 8 – Email from Janna Minsk to Jay Dobrowalski dated November 17, 2014



Ventura County, California
Resource Management Agency
GIS Development & Mapping Services
Map Created on 10-16-2014
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Source: Pictometry, Jan, 2014



County of Ventura
Planning Director Hearing
Case # PL13-0150
Exhibit 2 – Location Map

0 650 1,300 Feet

Disclaimer: This Map was created by the Ventura County Resource Management Agency Mapping Services. GIS which is designed and operated solely for the convenience of the County and related public agencies. The County does not warrant the accuracy of this map and no decision involving a risk of economic loss or physical injury should be made in reliance thereon.



3.0 Proposed CUP Modification

The requested modification to the CUP (the Project) entails renewal of the CUP with the current boundary and current operations, including the existing wells operations, for another 30 years. The modification also includes the renewal of the term for drilling, testing, production and maintenance of 18 previously approved wells. The locations of the existing wells are shown in Attachments 3 and 4 of this application. Some of these wells (as shown in the sections below have already been plugged and abandoned or are idle, i.e., not active), see Table 2. Drilling period for the remaining approved 18 wells which expired on October 29, 2011 is requested to be extended for the same time period as the CUP, to Feb 7, 2045.

All of the undrilled wells will be drilled on the existing four Drill Sites, as approved. No new grading or removal of vegetation outside of the existing Drill Sites will be done.

Vintage will not use hydraulic fracturing for the undrilled wells unless and until regulations addressing potential hydraulic fracturing impacts are adopted and in place.

It is the current practice that gross production from the existing wells is transported off the CUP via existing pipelines. It is anticipated that these existing pipelines will be sufficient to accommodate production from the remaining approved 18 wells for transportation of produced fluids off the CUP. Thus no new pipelines leading off the CUP are proposed. The installation of pumping units, gathering lines, electrical connections and ancillary equipment will be necessary to operate the remaining wells.

3.1 General Procedure for Drilling Proposed Wells

This section is a brief outline of the process for drilling a new well. It is only a general description which is subject to variation depending on a number of circumstances which may influence the drilling process, timing, and equipment required. The well drilling process is temporary. Temporary sanitary facilities and potable water will be brought on site during drilling operations in accordance with Environmental Health and Safety conditions.

The wells will be drilled on the existing Drill Sites, no new grading is proposed. The exact well location within each Drill Site will be decided when the proposed well is designed, all required offsets will be complied with.

A well conductor will be set before drilling starts (a relatively shallow larger diameter pipe which is cemented to surface). Once the conductor is set the drilling rig will be brought on site. It was conservatively estimated that a total of 30 truck trips over several days is required to mobilize the rig on location. Drilling will be conducted 24 hours per day for several weeks for each well (depending on the depth of each specific well). Drilling crew typically consists of 6 personnel per shift working in two 12-hour shifts. Other specialists and service providers can be onsite during drilling as well in addition to the rig crew.

Once the well has been drilled the rig and all appurtenances will be removed from the site. Specialized completions crews will then be onsite to conduct well completion operations, electrical and pumping unit installation, and connections to pipelines.

4.0 Allocation of Previously Approved Wells

The number of wells permitted under Condition 1 is equal to 36 (14 existing and 22 to be drilled) distributed among the four active Drill Sites. However, Condition 2 identifies 14 existing, and only 21 as to be still drilled, for a total of 35 wells. Plugged and abandoned well, Ferndale 401, API # 11121537, that is listed under Vintage operatorship by DOGGR, is located within the CUP boundary, on the land that used to be occupied by the old, abandoned, Drill Site #4; this may be the well that was counted in Condition 1, however this well has been plugged and abandoned in 1990, long before Vintage became the operator of the leases under CUP 3344.

The total number of wells drilled to date on the four CUP drill sites (including 2 that are plugged and abandoned) is equal to 17. The total number of wells approved in Condition 2 that remain to be drilled is 18. Table 2 provides the details on the existing and remaining approved wells.

Table 2 Existing Wells & Remaining (Undrilled) Previously Approved Wells

Well #	Existing Wells	API #	Well Status	Latitude	Longitude
Drill Site 1: 8 Existing Wells, 2 Wells Remain to be Drilled Previously Approved in the CUP					
1	Barker-Ferndale 1	11120423	Active	34.43385	-119.0855
2	Barker-Ferndale 3	11120609	Active	34.43384	-119.0856
3	Barker-Ferndale 4	11120685	Active	34.43386	-119.0854
4	Barker-Ferndale 2	11120604	Idle	34.43386	-119.0855
5	Barker-Ferndale 5	11120702	Idle	34.43386	-119.0854
6	Barker-Ferndale 6	11120730	Plugged	34.43407	-119.0852
7	Valex-Ferndale 110	11121163	Active	34.43386	-119.0853
8	Valex-Ferndale 107	11121066	Idle	34.43386	-119.0853
Drill Site 2: 4* Existing Wells, 6* Wells Remain to be Drilled Previously Approved in the CUP					
1	Valex-Ferndale 211	11121178	Active	34.43344	-119.0806
2	Valex-Ferndale 214	11121180	Active	34.43390	-119.0806
3	Valex-Ferndale 215	11121206	Active	34.43336	-119.0805
4	Valex-Ferndale 209	11121105	Idle	34.43349	-119.0807
Drill Site 3: 2 Existing Wells, 1 Well Remain to be Drilled Previously Approved in the CUP					
1	Valex-Ferndale 313	11121314	Idle	34.42921	-119.0817
2	Ferndale 8	11120732	Plugged	34.42910	-119.0813
Drill Site 7: 3 Existing Wells, 7 Wells Remain to be Drilled Previously Approved in the CUP					
1	Ferndale 716	11121563	Active	34.43854	-119.0830
2	Ferndale 717	11121569	Active	34.43843	-119.0831
3	Ferndale 712	11121492	Idle **	34.43864	-119.0829
Any of the four Drill Sites: 2 Wells Remain to be Drilled Previously Approved in the CUP					
Existing wells: 8 + 4 + 2 + 3 = 17; CUP-approved wells*: 2 + 6 + 1 + 7 + 2 = 18					
TOTAL = 35 wells on 4 drill sites. CUP states that a total of 36 wells are approved.					

*CUP Cond. 2 states that there are five (5) existing wells on Drill Site 2 and five (5) to be drilled remain, however DOGGR and Vintage records indicate that there are only 4 existing wells that have ever been drilled on Site 2. Thus, Vintage would like to request that because the total of 10 wells was approved for Drill Site 2, 6 wells are remaining and be allowed to be drilled per this application.

** The information in the Table is per the DOGGR online records, however, this well is being abandoned.

Vintage is requesting that the drilling period for the previously approved 18 wells be extended as part of this minor modification to renew the CUP time limit. Table 3 provides the List of wells that are requested to be renewed for drilling according to CUP 3344 Condition 2 (as approved on Dec. 21, 1989).

Table 3 Previously Approved Wells Requested to be Renewed for Drilling

Drill Site 1	2 Wells, Previously Approved in the CUP
Drill Site 2	6 Wells*, Previously Approved in the CUP
Drill Site 3	1 Well, Previously Approved in the CUP
Drill Site 7	7 Wells, Previously Approved in the CUP
Drill Sites 1,2,3, or 7**	2 Wells, Previously approved in the CUP
TOTAL	18 previously approved wells to be drilled

* See the Note for Table 2.

** Two wells from former Drill Sites 5 and 6 previously approved to be allowed to an existing Drill Site by future modification.

5.0 CUP Environmental Reviews History

The Ventura County Planning Commission (the County) approved a request to drill a single oil and gas well on June 21, 1971. ARGO Petroleum Corp. (ARGO) acquired the operating rights on the Ferndale Ranch in 1975. In June 1977 the County granted CUP-3609 to allow for the development of the Thomas Aquinas College (the College). In June 1978 the County approved a major modification to CUP 3344 for the drilling of 30 additional wells for a total of 36 wells on six Drill Sites (1, 2, 3, 4, 5, and 6). In order to approve the additional wells the County required an Environmental Impact Report (EIR) which was approved on June 21, 1978.

The Ferndale Ranch Lease oil production reservoir was reevaluated and as a result ARGO applied for a modification to the CUP requesting a new drill site (Drill Site 7) and reallocation of the approved, but not yet drilled, wells among the new and existing drill sites to allow for better access to the production zones. A Mitigated Negative Declaration (MND) was prepared to assess environmental impacts, and approved on March 23, 1983 by the County.

In April 1983 the decision that the MND fulfilled the appropriate documentation necessary to evaluate the environmental impacts of the modification requested by ARGO was appealed. The County upheld the appeal and found it necessary to develop a focused EIR in order to address traffic and access road orientation and development. On October 4, 1984 the focused access road FEIR was approved by the County.

To demonstrate compliance with the above-mentioned environmental documents, Vintage has prepared a mitigation measures compliance review of the 1978 EIR, the 1983 MND, and the 1984 access road focused FEIR (see Attachment 6).

Vintage is requesting that the drilling period for the previously approved 18 wells be extended as part of this minor modification to renew the CUP time limit. Table 3 provides the List of wells that are requested to be renewed for drilling according to CUP 3344 Condition 2 (as approved on Dec. 21, 1989).

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Drill Sites 1,2,3, or 7**	2 Wells, Previously approved in the CUP
TOTAL	18 previously approved wells to be drilled

* See the Note for Table 2.

** Two wells from former Drill Sites 5 and 6 previously approved to be allowed to an existing Drill Site by future modification.

EXHIBIT 4

FINAL IMPACT REPORT MODIFICATION TO CUP 3344 ARGO PETROLEUM CORPORATION FERNDALE RANCH LEASE

Prepared for:
Ventura County
Resource Management Agency
Dated October 4, 1984

By
McClelland Engineers, Inc
Environmental Services
Job No. 05830945

Parts I – III are herein included.
The entire document (Parts I – X) is incorporated by reference,
and is available at the Ventura County Government Center:

Planning Division
800 South Victoria Avenue
Ventura, California, 93009

FINAL ENVIRONMENTAL IMPACT REPORT
MODIFICATION TO CUP-3344
ARGO PETROLEUM CORPORATION
FERNDALE RANCH LEASE

Prepared for
Ventura County
Resource Management Agency

October 4, 1984

McClelland Engineers, Inc.
Environmental Services
Job No. 05830945

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I. INTRODUCTION AND SUMMARY

A. BACKGROUND

On July 6, 1978, the Ventura County Planning Commission approved Modification No. 3 to Conditional Use Permit No. 3344 that allowed ARGO Petroleum Corporation to drill up to 36 oil and gas wells within six approved drill sites on their Ferndale Ranch lease (Figure 1). As a part of the Planning Commission's action, an Environmental Impact Report (EIR) was certified in accordance with the State CEQA Guidelines.

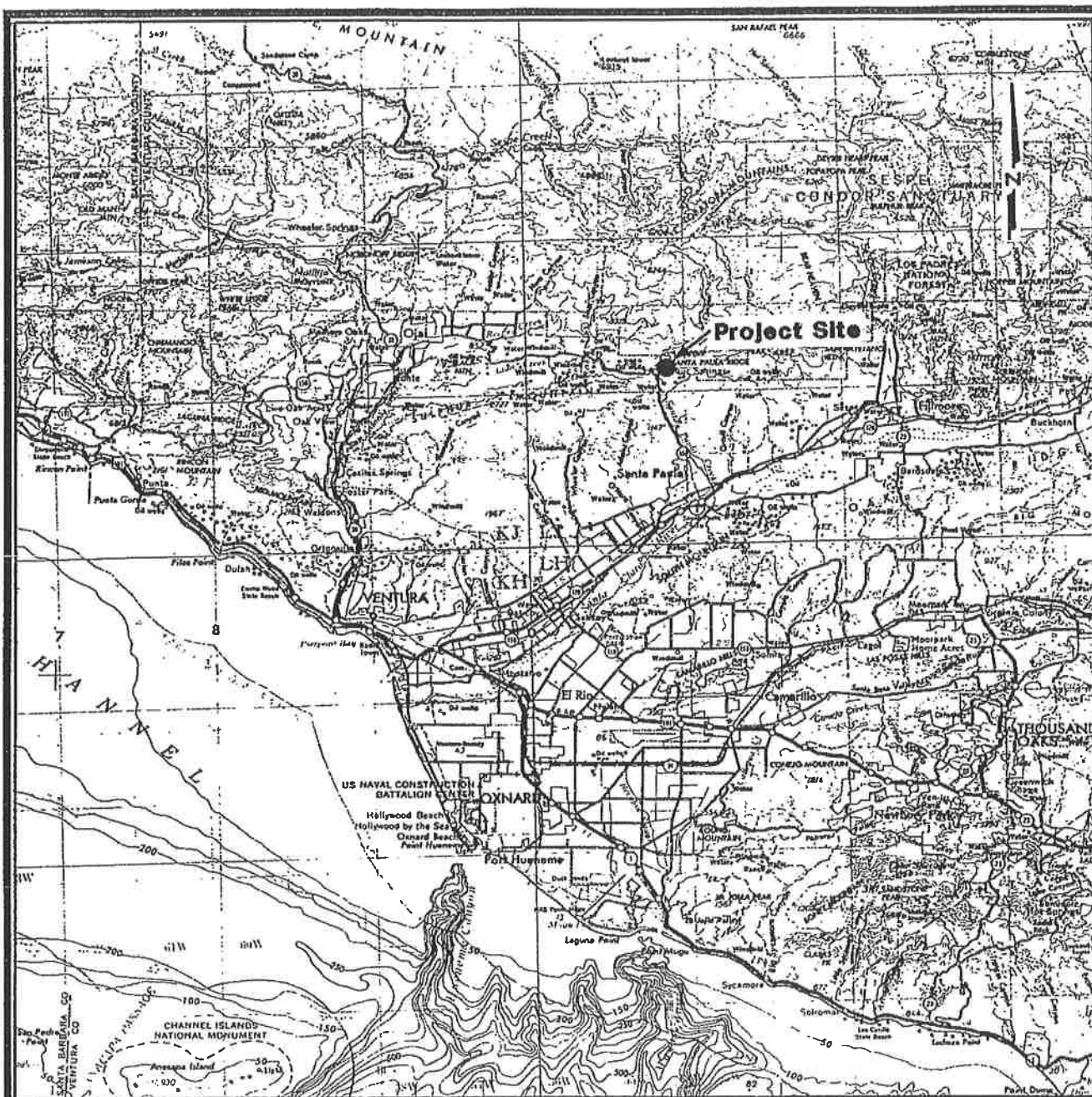
Subsequent to approval of the initial drilling program, additional data obtained by ARGO through the drilling of new wells suggested that the Ferndale Ranch oil reservoir is oriented along a north-south trending reservoir rather than an east-west reservoir as originally conceived. As a result, ARGO filed an application for Modification No. 8 to CUP-3344 on May 24, 1982. The proposed modification does not involve additional wells, but rather is a request to revise the planned drilling program to allow an additional drill site and to reallocate the number of wells permitted on each drill site.

Upon initial environmental review, a Mitigated Negative Declaration was determined to be the appropriate environmental document necessary to address the environmental effects of the project. A Mitigated Negative Declaration for the project was approved by the Ventura County Environmental Report Review Committee on March 23, 1983.

On April 4, 1983, Thomas Aquinas College appealed the Environmental Report Review Committee's decision to the Board of Supervisors contending that the Mitigated Negative Declaration did not adequately address the environmental impact of the proposed project. On October 4, 1983 the Ventura County Board of Supervisors upheld the appeal by Thomas Aquinas College and determined that a focused EIR should address traffic and circulation alternatives. The Board directed that this EIR need not address the actual drilling and production of oil and gas, but only the potential for significant environmental impacts because of the expected traffic related to drilling and production activities. The Board's decision was conditioned upon ARGO's amending its application for Modification Nos. 8 and 9 to incorporate all mitigation measures included in the Mitigated Negative Declaration prepared for the project (July 16, 1982). A copy of the Mitigated Negative Declaration is included herein as Appendix A.

B. PURPOSE AND OBJECTIVES OF EIR

In accordance with the Board's October 4, 1983, decision, the objective of this focused EIR is a comparative analysis of all reasonably feasible alternative access roads that may be available to serve oil related traffic associated with Argo Petroleum's revised drilling program for its Ferndale Ranch lease. The intent is to provide decision-makers with sufficient information to select the environmentally superior access alternative. However, this EIR is only intended to be a comparative analysis of possible access corridors; it is not a design and engineering study for specific road alignments. While it is recognized that ranking systems are inherently



REGIONAL LOCATION MAP

subjective, this EIR contains a suggested ranking based on environmental factors considered for the various access concepts available. Where possible, rough cost estimates for mitigation have been provided to allow a determination of reasonableness for various alternatives.

C. LEGAL AUTHORITY

Approval of the requested Conditional Use Permit modifications is at the discretion of the Ventura County Planning Commission; therefore, it is subject to the provisions of the California Environmental Quality Act, as amended (Public Resources Code, Section 1200 et. seq.).

Pursuant to the State CEQA Guidelines (California Administrative Code, Title 14, Division 6, Chapter 3), the Planning Division of the Ventura County Resource Management Agency is the lead agency for the proposed project. The Planning Division has prepared an initial study (contained herein as Appendix B) and a Mitigated Negative Declaration (Appendix A) that address the environmental impacts and mitigation measures for all elements of the proposed project, with the exception of the determination of the environmentally superior access road alternative. As provided in Section 15163 of the State CEQA Guidelines, this focused EIR is intended to be used in conjunction with the previously prepared Mitigated Negative Declaration, which together address the full range of environmental effects associated with the proposed project.

D. RESPONSIBLE AND TRUSTEE AGENCIES

Because the proposed project requires the modification of an existing use permit, the county of Ventura is the lead agency for the EIR. Responsible agencies for the project may include the California Division of Oil and Gas, and the Regional Water Quality Control Board.

The proposed project will require permits to drill all wells from the California Division of Oil and Gas (DOG). This is initiated when an applicant files a Notice of Intention to drill a new well. Other permits that are issued by the DOG are to rework an existing well and to abandon a well.

If the project will discharge waste to surface waters or will discharge waste that may affect groundwater quality, it must receive a permit or obtain waste discharge requirements from the Regional Water Quality Control Board (RWQCB). At this time, the project is not planned to discharge any wastes that would require a permit from the RWQCB.

In addition to the responsible agencies described above, the California Department of Fish and Game is a trustee agency for any fish and wildlife resources that could be affected by the project.

E. SUMMARY OF ENVIRONMENTAL IMPACTS
AND MITIGATION MEASURES

Table 1 is a summary of the environmental issues addressed for each access road and entrance alternative. A comparison of alternatives is contained in Section VII of this report.

F. OVERALL RANKING

In order to facilitate decision-maker review of the EIR, this section provides a suggested ranking system for various entrance and access alternatives available to accommodate oil related traffic on Argo Petroleum Corporation's Ferndale Ranch Lease. The ranking system is based strictly on environmental factors addressed in this EIR. While ranking systems are inherently subjective, this section provides a suggested ranking of access alternatives for oil activities on the subject property. Although cost estimates for mitigation are not required by the State CEQA Guidelines, and are not incorporated into this environmental ranking, rough costs have been included for reference. The intent is to provide information to decision-makers to determine the reasonableness of various options.

Table 2 presents a comparison of each access route and entrance alternative addressed in this EIR. This comparison is on a per issue basis and does not include weighting factors for degree of impact. The lowest value for each category is considered the "most preferable" and the highest value is considered the "least preferable." The final column of Table 2 identifies a ranking of alternatives.

The environmentally superior alternative for Argo's oil traffic involves the use of the following road segments (the ridge alternative):

- o Separate entrance to Ferndale Ranch for oil traffic;
- o Use of old Ferndale Ranch road;*
- o Crossing of a gully to access road to drill site 3 without using main college road;
- o Access road to drill site 3;
- o Construction of new road from drill site 3 to Planning Commission road, behind the ridge;
- o Realignment of portion of Planning Commission Road to reduce runaway vehicle hazard, while accessing drill sites 1 and 7.

*It should be noted that the cost of cliff stabilization measures may not justify the incremental environmental benefits of the use of the Old Ferndale Ranch road. The alternative is the continued use of the existing entrance road for a short distance by both the college and oil traffic.

Table 1.
Summary of Environmental Impacts and Mitigation Measures

Issue	Access Routes				Entrance Alternatives			
	Shared College/Ranch Road	Planning Commission Road	Drill Site No. 3 to Planning Commission Road		Side Hill Road	Shared Entrance	Old Ferndale Ranch Rd. Partial Traffic Separation	Old Ferndale Ranch Rd. Full Traffic Separation
			Canyon Alternative	Ridge Alternative				
a. <u>Geologic Hazards</u>	No major geologic hazards. Surficial landsliding of adjacent slope potentially requiring road maintenance.	Crosses two major landslide areas. Mitigation measures are available but at a substantial cost.	No major geologic hazards up the canyon. However, lower portion crosses the landslide area along the Planning Commission Road. Mitigation measures are available, but at a substantial cost.	No major geologic hazards. Could require downslope slope stability measures (e.g. retaining structure).	No major geologic hazards. However, this route would require steep cut slopes and retention facilities up slope, and slope stability measures downslope.	Present geologic hazards are minimized	Potential slope stability hazard near bluffs. Mitigated by increased setback, and/or costly stabilization measures.	Potential slope stability hazard near bluffs. Mitigated by increased setback, and/or costly stabilization measures.

Issue	Access Routes					Entrance Alternatives		
	Shared College/Ranch Road	Planning Commission Road	Drill Site No. 3 to Planning Commission Road Canyon Alternative	Ridge Alternative	Side Hill Road	Shared Entrance	Old Ferndale Ranch Rd. Partial Traffic Separation	Old Ferndale Ranch Rd. Full Traffic Separation
b. <u>Traffic Safety/ Circulation</u>	Maximum interaction of college and oil related traffic. Potential safety-impacts associated with runaway vehicles and hiker and pedestrian activities.	Five relatively sharp curves, and grades ranging from 5 - 20+ percent slope. Potential for runaway vehicles. Mitigation includes use of planning commission alignment alternative to alleviate runaway vehicle hazard.	No significant traffic or roadway alignment impacts except along the Planning Commission road segment. Potential for runaway vehicle hazard associated with Planning Commission road segment can be mitigated with an alternative alignment.	Two relatively sharp curves and a short segment in excess of 15 percent grade. Potential for runaway vehicle hazard associated with Planning Commission road segment can be mitigated with an alternative alignment.	No significant traffic or roadway alignment impacts.	Maximum interaction of college and oil related vehicles.	Development of two new intersections with the existing college access road, increasing turning movement safety hazards. Guard gate control would mitigate this impact at the site entrance but not at other intersections.	Development of one new intersection with the existing college access road. Impacts could be fully mitigated by guard gate control at the site entrance.

Issue	<u>Access Routes</u>					<u>Entrance Alternatives</u>		
	Shared College/Ranch Road	Planning Commission Road	Drill Site No. 3 to Planning Commission Road		Side Hill Road	Shared Entrance	Old Ferndale Ranch Rd. Partial Traffic Separation	Old Ferndale Ranch Rd. Full Traffic Separation
			Canyon Alternative	Ridge Alternative				
c. <u>Noise</u>	Daily noise levels would not be expected to exceed adopted standards. However single event noise generation from truck passbys would be perceived as a significant nuisance. A noise attenuation wall would partially mitigate perceived noise impact	Potential impact to future faculty housing residents	No significant noise impact.	Noise impacts attenuated by ridgeline.	Similar impact as described for shared college road. Noise attenuation wall would partially mitigate perceived noise impact	No noise impact. Noise attenuation barrier would reduce or eliminate perceived noise impacts, but would potentially result in visual impacts.	No noise impact. Noise attenuation barrier would reduce or eliminate perceived noise impacts, but would potentially result in visual impacts.	No noise impact. Noise attenuation barrier would reduce or eliminate perceived noise impacts, but would potentially result in visual impacts. Potential impact to future faculty housing residents

Issue	<u>Access Routes</u>					<u>Entrance Alternatives</u>		
	Shared College/Ranch Road	Planning Commission Road	Drill Site No. 3 to Planning Commission Road		Side Hill Road	Shared Entrance	Old Ferndale Ranch Rd. Partial Traffic Separation	Old Ferndale Ranch Rd. Full Traffic Separation
			Canyon Alternative	Ridge Alternative				
d. <u>Biologic Resources</u>	No significant biologic impacts.	Oak tree removal as result of necessary landslide stabilization and roadway widening and improvements. Replanting of oak trees partially mitigates these impacts.	Removal of significant riparian habitat and oak trees. Replanting of oak trees would partially mitigate this impact.	No significant biologic impacts.	No significant biologic impacts.	No significant biologic impacts.	No significant biologic impacts.	No significant biologic impacts.

Access RoutesEntrance Alternatives

Issue	Shared College/Ranch Road	Planning Commission Road	Drill Site No. 3 to Planning Commission Road		Side Hill Road	Shared Entrance	Old Ferndale Ranch Rd. Partial Traffic Separation	Old Ferndale Ranch Rd. Full Traffic Separation
			Canyon Alternative	Ridge Alternative				
e. <u>Visual Resources</u>	Significant impact as a result of foreground noise barrier, partially screened by existing structures. Vegetative screening would par- tially miti- gate this impact.	Visual impact limited to distant road cut and grad- ing impacts.	Visual im- pacts limit- ed to distant road cut and grading impacts	No signi- ficant visual impact.	Signifi- cant visual impact from most college viewing loca- tions. Vege- tative screening would have some but limited ef- fectiveness. High visibility from State Route 150, a proposed scenic highway.	High visibil- ity of oil related truck traffic and noise atten- uation walls. Vegetative screening could par- tially miti- gate this impact.	Moderate visibility of oil related truck traffic. Potentially significant visual im- pact of noise wall. These visual im- pacts can be minimized by use of natural building ma- terials and heavily land- scaped berms, as necessary, to alleviate potential impacts.	Distant vis- ual impact associated with wall facilities. Use of berm- ing and/or natural materials (e.g., wood) instead of a block wall to attenuate noise.

Issue	<u>Access Routes</u>					<u>Entrance Alternatives</u>		
	Shared College/Ranch Road	Planning Commission Road	<u>Drill Site No. 3 to Planning Commission Road</u>		Side Hill Road	Shared Entrance	Old Ferndale Ranch Rd. Partial Traffic Separation	Old Ferndale Ranch Rd. Full Traffic Separation
			Canyon Alternative	Ridge Alternative				
f. <u>Cultural Resources</u>	No direct im- pact to cul- tural re- sources is expected. The potential exists for the occurrence of subsurface archaeologi- cal remains in the immed- iate vicinity of the road- way. Mitiga- tion in- cludes on-site monitoring by a qualified archaeologist if roadway im- provements are required.	The potential exists for the occurrence of subsurface archaeologi- cal remains. Mitigation includes monitoring by a qualified archeologist to prevent indirect impact to potential resources.	No cultural resources were identified and no impacts to cultural re- sources are expected to occur.	No cultural resources were identified and no impacts to cultural re- sources are expected to occur.	No direct impacts to cultural resources are expect- ed to occur. The potential exists for the occur- ence of sub- surface arch- aeological remains in the vicinity of this road- way. Mitiga- tion includes on-site moni- toring by a qualified archaeologist.	No cultural resources were identi- fied and no impacts to cultural re- sources are expected to occur.	No cultural resources were identi- fied and no impacts to cultural re- sources are expected to occur.	No cultural resources were identi- fied and no impacts to cultural re- sources are expected to occur.

Access RoutesEntrance Alternatives

Issue	<u>Access Routes</u>					<u>Entrance Alternatives</u>		
	Shared College/Ranch Road	Planning Commission Road	Drill Site No. 3 to Planning Commission Road Canyon Alternative	Ridge Alternative	Side Hill Road	Shared Entrance	Old Ferndale Ranch Rd. Partial Traffic Separation	Old Ferndale Ranch Rd. Full Traffic Separation
9. <u>Road Feasibility/ Costs</u>	Feasible - Cost for wall esti- mated at \$84,000	Feasible - Cost esti- mated at \$740,000 including landslide stabilization	Feasible - Cost esti- mate at \$526,000 in- cluding stabi- lization of Planning Com- mission Road segment.	Feasible - Cost esti- mated at \$76,000.	Not feasible as trench concept - Cost estimate for roadway and 10 foot wall structure is \$93,000.	Feasible - Cost of guard gate. Cost of stabilization may be re- quired in the future.	Feasible - Cost esti- mate not available due to uncertain- ties in slope stabilization requirements and associated costs. Grad- ing and oiling costs esti- mated at \$21,000.	Feasible - Cost estimate not available due to uncer- tainties in slope stabi- lization re- quirements. Grading, oil- ing and cul- vert costs estimated at \$21,000.

Table 2.

Comparison and Suggested Ranking of Access Alternatives

Environmental Impact Comparison
(1 = least impacts; 5 = most impacts)

Cost
Comparison

A. Access Routes	Geologic Hazards	Traffic & Safety/ Circulation	Noise	Biologic Resources	Visual Resources	Cultural Resources	Suggested Environmental Ranking	Estimated Cost
							(1 = best; 5 = worst)	(1 = lowest; 5 = highest)
1. Shared College/Ranch Access Rd.	1*	5***	5***	1*	4***	1*	3	2
2. Planning Commission Road	5***	4***	3**	4***	2**	2*	5	5
3. Drill Site No. 3 to Planning Commission Road								
a. Ridge Alternative	2*	3**	1**	2*	1**	1*	1	1
b. Canyon Alternative	4***	2**	1**	5***	2**	1*	4	4
4. Side Hill Route	2*	1*	4***	2*	5***	2*	2	3

Comparison and Suggested Ranking of Entrance Alternatives

Environmental Impact Comparison
(1 = least impacts; 3 = most impacts)

Cost
Comparison

B. Entrance Alternatives	Geologic Hazards	Traffic & Safety/ Circulation	Noise	Biologic Resources	Visual Resources	Cultural Resources	Environmental Ranking	Estimated Cost
							(1 = best; 5 = worst)	(1 = lowest; 5 = highest)
1. Shared	1*	3***	3*	1*	3***	1*	3	1
2. Old Ferndale Ranch Road								
a. Partial Traffic Separation	2**	2**	2*	2**	2**	1*	2	2
b. Full Traffic Separation	2**	1*	1*	2**	1**	1*	1	3

Insignificant impact *

Significant Impact that can be Mitigated**

Significant unavoidable Adverse Impact***

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The following modification of the above route could be significantly less costly while only increasing potential impacts somewhat.

- o Use of the shared college/ranch road entrance for college and oil related traffic.

Although less costly due to the avoidance of geotechnical evaluation and cliff stabilization costs, this modification would increase the potential for conflicts between the college and oil traffic.

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100

II. PROJECT DESCRIPTION

A. PROJECT APPLICANT

Argo Petroleum Corporation
940 East Santa Clara Avenue
Ventura, California 93001

B. PROPERTY OWNERS

Lawrence Barker, Jr.
No. 1 Maritime Plaza, Suite 2145
San Francisco, California 94111

Thomas Aquinas College
10000 N. Ojai Road
Santa Paula, California 93060

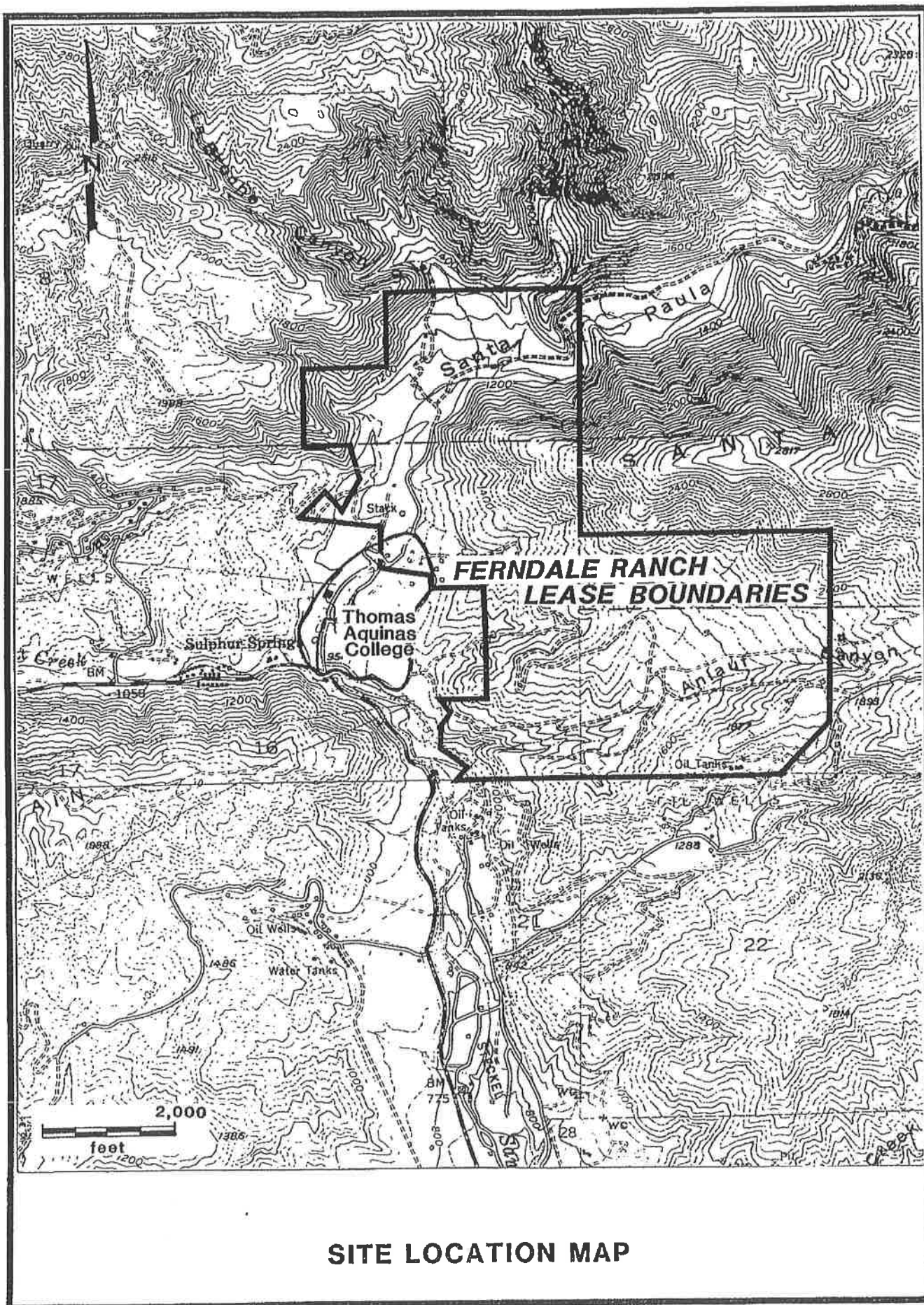
C. PROJECT LOCATION AND LEGAL DESCRIPTION

Argo Petroleum Corporation's Ferndale Ranch lease is located on the eastern portion of the Silverthread area of the Ojai oil field, approximately three miles north of the city of Santa Paula. The Ferndale Ranch property encompasses over 1100 acres immediately northeast of State Highway 150 and east of Santa Paula Creek (Figure 2). Access to the property is available via a private roadway that is presently shared by Thomas Aquinas College, Ferndale Ranch and Argo Petroleum.

The project site is presently zoned R-E-lac (Rural Exclusive - one acre minimum lot size). Oil development within the R-E-lac zone is a conditionally permitted use. Argo's existing oil operations are permitted in accordance with the provisions of Conditional Use Permit (CUP) 3344 and subsequent modifications to that permit. CUP 3344 applies to approximately 791 acres that are legally identified as Assessor's Parcel Nos. 40-060-05 and 15, and 40-010-26.

D. PROJECT OBJECTIVES

The existing CUP, approved in 1978, permits the drilling of up to 36 wells from six drill sites. At the time the original CUP application was approved, a high degree of uncertainty existed as to the exact location and extent of oil and gas resources beneath the Ferndale Ranch. This is common in the oil development industry because it is not possible to determine all reservoir characteristics without drilling development wells. Initially, based on geologic and exploration data, it was believed that the oil reserves beneath the Ferndale Ranch were located in a reservoir oriented in an east-west direction. As a result, drilling and production plans identified as a part of the application for CUP-3344 were designed to maximize production given the assumption of an east-west trending field. However, since the



approval of CUP-3344, 13 wells have been drilled on the project site that have provided a substantial amount of new information concerning the sub-surface oil reservoir. New information indicates that oil reserves beneath the property are oriented in a north-south direction along Santa Paula Creek.

In response to these new findings, Argo is requesting a modification to CUP-3344 to transfer the right to drill 17 oil and gas wells from three previously approved (undeveloped) drill sites to one existing drill site, and a new drill site (No. 7) located north of existing drill site No. 1. The total number of wells permitted under CUP-3344 would remain at 36. However, the number of wells permitted on the individual drill sites would be redistributed as follows:

<u>Drill Sites</u>	<u>Previously Approved Wells</u>	<u>Wells Drilled To Date</u>	<u>Proposed Change</u>	<u>Total Proposed Wells</u>
#1	8	8	+2	10
#2	5	4	+5	10
#3	5	1	-2	3
#4	6	0	-5	1
#5	6	0	-5	1
#6	6	0	-5	1
#7	0	0	+10	10
	<u>36</u>	<u>13</u>	<u>0</u>	<u>36</u>

E. PROJECT CHARACTERISTICS

Oil extraction operations can be broken down into four distinct components -- site preparation, drilling, production and abandonment. While these phases may overlap to a certain extent, the degree to which they overlap is largely dependent upon oil field characteristics and economic market conditions. Each of these project phases is described below.

1. Site Preparation

Other than slight modifications to drill site No. 2, site preparation will only be necessary for drill site No. 7. Site preparation involves all the activities prior to the actual commencement of drilling. These include clearing and grading of drill sites, access roads, construction of well cellars, and installation of the conductor pipe.

During the site preparation phase, a tractor-trailer will haul a rubber tired front-end loader to the site. The front-end loader will be used to grade a single lane dirt roadway to drill site No. 7 and move approximately 4,000 cubic yards of dirt to provide a 0.86 acre drill pad.

During site preparation, the maximum daily traffic expected is three heavy truck trips and two light vehicle trips. Once site preparation is completed for drill site No. 7, the only traffic related to site modification would be a result of routine or emergency site maintenance.

2. Drilling

A compact conventional rotary drilling rig will be hauled by tractor-trailer to each drill site after the roadway and drill sites have been prepared. Upon delivery, the first procedure is to "rig up," which is the process of assembling and placing the drilling rig components in position to drill. The rig drawworks, pump and tank for circulation and storage of drilling fluid will be placed within the level area of the drill site. The substructure of the drilling rig rises eight feet above ground level to provide space for blowout prevention equipment and the rotary drive assembly. The planned drilling rig mast height stands 133 feet when raised to an upright position.

The actual drilling of a well is an intensive process that may take from a few days to several weeks to complete, depending on the well depth, hardness of subsurface materials, and problems that may be encountered. While drilling, the rig turns a drill string rotating a bit at the bottom of the drilling assembly. As the hole is deepened, additional sections of drill pipe must be added. Sixty days fuel consumption by the drilling rig is estimated to range between 96 and 186 gallons per day. Fuel will be supplied to the site in drums and pumped into the rig's fuel tanks.

As the drill bit turns in the hole, it makes rock cuttings that must be removed from the hole. This is accomplished through the use of drilling mud that is continuously circulated between the surface and the bottom of the hole to pick up the cuttings from the bit and transport them to the surface. Other purposes of drilling mud are to cool the drill bit and drill string, maximize the penetration rate, prevent inflow of formation fluids into the well bore, and coat the exposed walls of the hole with filter cake to minimize fluid loss into permeable formations. During drilling operations, approximately 60 barrels of water (2520 gallons) will be required to make up the drilling mud. This will be delivered by a 60 barrel vacuum truck. All drilling mud and cuttings will be stored in steel tanks to be later hauled away for disposal at state-licensed sites.

Casing for all wells will be cemented to the top of the oil-bearing formation for protection of the fresh water aquifers in the area. Casing is simply a large steel pipe that is used for the sides of the drilled hole to keep it from caving in. The casing and cement also seal off pressure and fluids from underground formations through which the hole penetrates. To run a string of casing, the drill string is removed from the hole. Then each joint of the same diameter casing is screwed together and lowered into the hole to make up a complete casing string. After the casing is run into the hole, cement is pumped into the casing and then displaced from the bottom end to fill the annular space between the casing and the wall of the well. Once the cement hardens, the subsurface formations are permanently sealed from each other.

After the well has been drilled to its objective depth and production casing has been run and cemented, well completion can take place. The rig will then be skidded to the next well location at the same drilling site or moved to the next drill site and the drilling procedure repeated.

Drilling operations normally take between 30 and 60 days per well including production testing phases. Assuming that all of the remaining 17 wells are drilled consecutively, drilling operations are expected to last for approximately 2 to 3 years after project approval. If the drilling program is interrupted, it could be longer before all drilling is completed.

During the drilling of each well, an average of approximately 30 one-way vehicle trips per day will occur. Most of these will be light vehicles, but the drilling-related traffic will also include an average of 3 heavy truck trips per day.

3. Petroleum Production

Once a well is drilled and flowing, the production phase of an oil development project commences. Because additional wells may be necessary to fully develop an oil field, the drilling and production phases often overlap.

In contrast to development drilling which is an intensive short-term operation, petroleum production is a long-term, but less intensive operation, involving permanent location of equipment lasting over the producing life of the field. This equipment normally includes pumping units, separation/-treatment equipment, tankage, vapor recovery equipment, and assorted piping.

During the production phase of an oil and gas project, most of the vehicular traffic is associated with the transportation of oil and wastewater. However, Argo's existing CUP requires the use of a pipeline for shipment of oil. Although the temporary shipment of oil by trucks has been necessary in the past, because of pipeline repair and maintenance, the pipeline is presently in operation; therefore, this report assumes that all oil will be shipped by pipeline over the long-term.

During the production phase, routine vehicular traffic will include surveillance personnel, deliveries of supplies and fuel, and wastewater hauling. An operator will inspect each well at least twice daily for leakage of fluids or vapor, make adjustments, test wells, and generally maintain the site. Throughout each day, the operator will visit each production site three to four times.

Occasionally, major maintenance will be required of the pumps. It is normally expected that the subsurface pump will need to be replaced after nine months of operation, which will require a well service rig (approximately the same dimensions as a drilling rig) to be transported to the site. Since mechanical wear will vary from well to well, each pump replacement will be on an individual basis. During well service operations, water will be pumped from a tank facility to each well. This water will provide fluid for safety control of the well and to preclude excessive vapor emissions.

Other activities that may take place during the production phase include fracturing and acidizing. Fracturing involves artificially opening up a formation to increase its permeability and the flow of oil to the bottom of a well. This is accomplished by forcing a sand and fluid mixture into the formation to open cracks. Acidizing is another method of opening a formation to increase the oil flow. Under this method an acid solution is pumped into the well to dissolve limestone deposits in the rocks, thus opening paths for the oil to flow. Both fracturing and acidizing involve the services of a specialized contractor with custom-built pumps and equipment.

4. Abandonment

If a well is unsuccessful, or at the end of the producing life of a field, well abandonment takes place pursuant to procedures specified by the California Division of Oil and Gas in "California Laws for Conservation of Petroleum and Gas."

Surface equipment and ancillary facilities will be removed as a part of this phase.

F. DRILLING/PRODUCTION SCENARIOS

For most residential, commercial, and industrial projects, the parameters, upon which an environmental analysis is based, are well defined. However, for energy development, particularly oil and gas production, the description of the expected ultimate project is based strictly upon speculation on the amount and characteristics of petroleum deposits sought. Since many of the potential impacts (e.g., traffic) are directly related to the production level, a high degree of uncertainty exists regarding the magnitude of potential impacts.

The approach taken in this report is intended to avoid the problem of a strictly "worst case" analysis, while at the same time providing information on the full implications of the project. In this study, three scenarios for the project have been developed that are intended to cover the likely range of drilling and production possibilities. The three scenarios represent a "high find," "medium find," and "low find" and are the basis for the traffic generation assessments.

Because a substantial amount of information is available concerning existing operations, the scenarios focus upon the 23 remaining approved but undrilled wells. Assumptions regarding future levels of drilling and production have been added to existing levels. Given current conditions, only limited if any site preparation will be necessary for drill sites 1, 2 and 3.

Table 3 is a summary of the three development scenarios. These scenarios are described in further detail below.

1. High Find Scenario

Under the "high find" scenario, Argo's reservoir geologists project that the reservoir under the Ferndale Ranch lease could produce approximately 5000

TABLE 3

Project Development Scenarios

Scenario	New Wells Drilled	Production (Average Daily)	
		Oil (bbls) ¹	Water (bbls) ²
High Find	23	5000	5000
Medium Find	11	1500	1500
Low Find	5	500	500

- 1.) Assumes equal production distribution for all 36 wells planned for the site. Total production - 5000 bbl/day - high find, 1500 bbl/day - medium find and 500 bbl/day low-find.
- 2.) Based on average waste/water production of 50 percent for existing Ferndale Ranch lease area (Division of oil and Gas, 1984).

barrels of oil per day (BOPD), requiring 23 additional wells to be drilled for a total of 36 wells. This oil is assumed to be transported by pipeline and not result in the generation of oil tanker truck traffic.

One of the products of oil recovery is often times water. Produced water from oil formations is generally of poor quality and must be disposed. Presently, while Argo plans to develop an acceptable on-site disposal method, produced water is pumped to a storage facility at drill site No. 3 and transported offsite by truck to a suitable disposal area. Therefore, for the purposes of this study, it is assumed that produced water generated by drilling and production operations will be trucked off-site. Produced water generation varies considerably from well to well depending upon formation characteristics and other site specific factors. Produced water generation for existing wells within the Ferndale Ranch lease ranges from 9-88 percent by volume with an average of approximately 50 percent (i.e., 1:1 oil/water ratio). Assuming that 50 percent by volume of well production is water, total water production for the high find scenario is projected to be 5000 barrels per day.

It is assumed that the water trucks used to transport wastewater off-site will have a capacity of approximately 100 barrels. Given this assumption and the estimated wastewater generation, the high find scenario is projected to generate approximately 50 (two way) truck trips per day to haul out wastewater. This is a worst case assumption. Because of the high cost of truck transport, it is likely that a more cost-effective method for disposal of wastewater would be developed such as reinjection into the reservoir.

Natural gas generated by the proposed project will be transported via pipeline to a nearby distributor or reinjected back into the formation until such time as a pipeline is available. Natural gas will not be transported off-site via truck.

Light vehicle traffic associated with the production phase is expected to be similar for all scenarios and is estimated to be about 3-4 vehicle trips per day.

Peak traffic levels will occur while the last well is being drilled and total production from the previously drilled wells nears its peak level. Under the "high find" scenario, peak traffic levels will be approximately 84 vehicle trips per day, of which 31 are light-duty vehicles and 53 are trucks. This assumes 30 trips per day for the drilling of the well (3-4 light-duty vehicles; 27 trucks) and 53 trips per day for production (3-4 light-duty vehicles; 50 wastewater trucks). If an alternative method for wastewater disposal is utilized that eliminates hauling by trucks, the peak traffic level for this scenario will be reduced to approximately 34 vehicle trips per day of which only 3 are heavy trucks.

2. Medium Find

This scenario assumes the drilling of 11 new wells (for a total of 24) and a total production rate of 1500 BOPD for the Ferndale Ranch lease area. Assuming 50 percent of well production is water, total water production is projected to be 1500 barrels per day.

Assuming use of a pipeline for all oil production, it is anticipated that this production level will generate an average of 15 wastewater truck trips (100 bbl capacity) per day. It is important to note these estimates represent two-way roundtrips and that each trip would involve a vehicle passing by a point two times (one inbound and one outbound).

Light duty vehicle traffic associated with production is not directly related to production volumes and is, therefore, expected to be approximately 3-4 vehicles per day as indicated for the "high find" scenario.

The peak traffic level for the "medium find" scenario is estimated to be 49 vehicle trips per day of which 18 are heavy trucks. If an alternative method of wastewater disposal is utilized that eliminates hauling by trucks, peak traffic levels are estimated to be reduced to 34 vehicle trips per day, of which only 3 are heavy trucks.

3. Low Find Scenario

This scenario assumes only 5 new wells are drilled and that production on the Ferndale Ranch lease will be approximately 500 barrels of oil per day. Assuming 50 percent of total well production is water, total water production for this scenario is projected to be 500 barrels per day. Assuming use of a pipeline for all oil production, vehicular traffic associated with this scenario is estimated to be 5 wastewater truck trips per day and approximately 3-4 light duty vehicles per day.

The peak traffic level for the "low find" scenario is estimated to be 39 vehicle trips per day of which 8 are heavy trucks. If an alternative method of wastewater disposal is utilized, peak traffic levels would be reduced to 34 vehicle trips per day, of which only 3 are heavy trucks.

G. PRIMARY ACCESS ALTERNATIVES

The proposed modifications to CUP-3344 (Modifications 8 and 9) do not involve an increase in the number of wells that are currently allowed under CUP-3344, but rather involve the reallocation of wells to existing drilling sites, modification of the CUP to legalize already completed expansions of drill sites 1 and 2, and the development of a new drill site (No. 7) north of drill site No. 1. Drill site No. 7 will require 4,000 cubic yards of grading to provide a 0.86 acre drill pad.

While environmental issues pertaining to pad location and drill site expansion have been resolved through development conditions, the environmentally superior access road has not been determined. The focus of this analysis is to evaluate four primary access alternatives identified by the Ventura County Board of Supervisors and, to a lesser extent, evaluate other potential access routes. However, this EIR is only intended to be a comparative analysis of possible access corridors and not a design and engineering study for specific road alignments.

The four primary roadway alignment alternatives addressed in this EIR include the following (Figure 3):

- I Shared College/Ranch Road (existing condition)
- II Planning Commission Approved Road
- III Drill Site 3 to Planning Commission Road
- IV Side Hill Road

These four primary alternatives include three variations; two associated with primary alternative No. III, and one associated with primary alternative No. II. The variations associated with alternative No. III represent two ways of accessing the Planning Commission Road from drill site No. 3. These variations include a canyon route east of drill site No. 3, identified throughout this report as alternative No. IIIa, and a ridge route west of drill site No. 3, identified as alternative IIIb.

The alignment variation associated with the Planning Commission Road involves a straightening of a 600 foot segment located south of drill site No. 2 and northwest of the existing college water storage reservoir. This segment could be implemented in conjunction with alternative II as well as alternative III.

In addition to the roadway alignment alternatives identified above, there are three entrance alternatives that are evaluated in this focused EIR. Entrance alternatives addressed herein include:

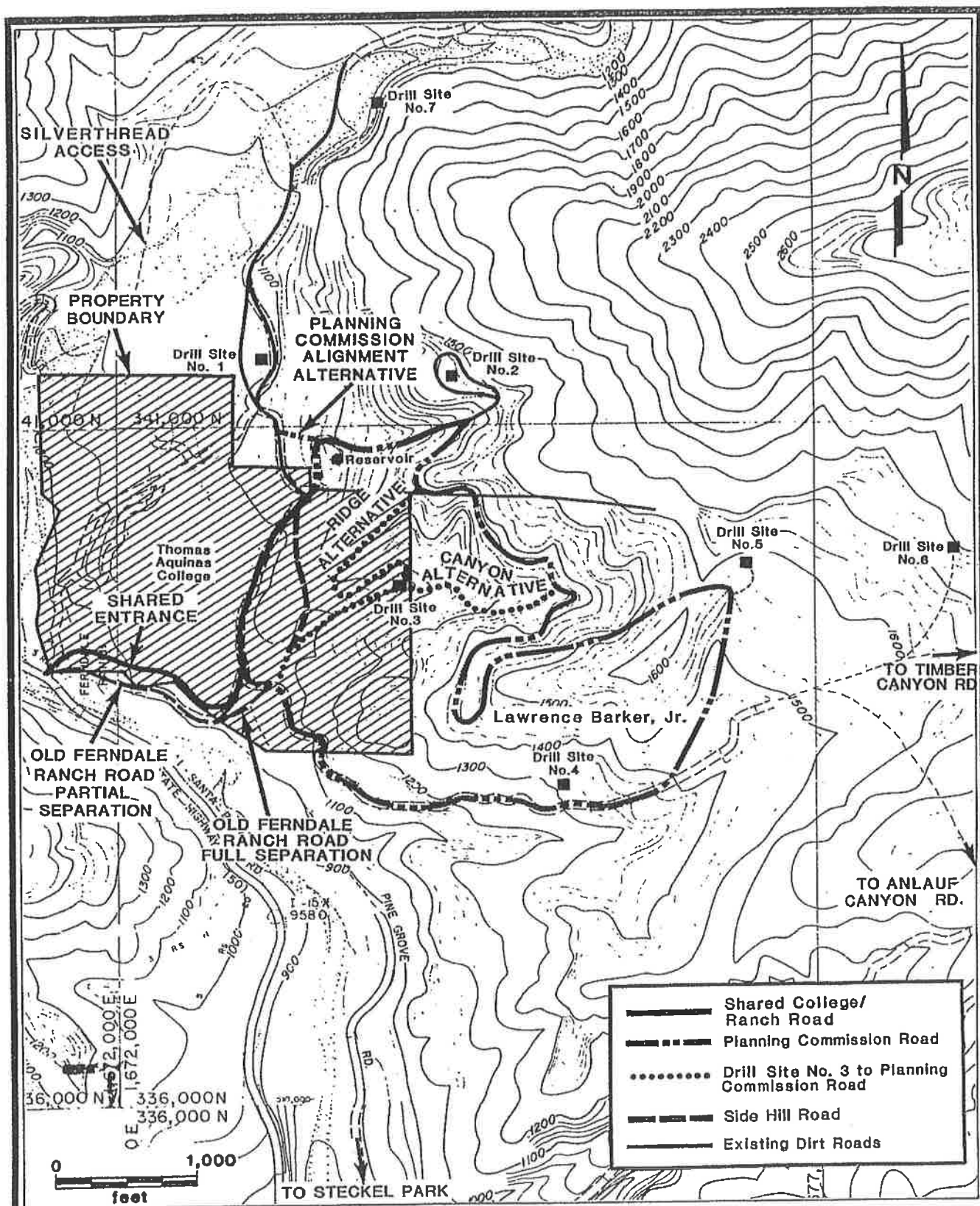
- A. Shared Entrance (existing condition)
- B. Old Ferndale Ranch Road
 - (1) Full traffic separation alternative (includes gully crossing)
 - (2) Partial traffic separation alternative

While any of the entrance alternatives indicated above could be theoretically combined with the possible primary access alternatives, many of the combinations do not serve the objective of this study to identify the environmentally superior access corridor.

Other access alternatives evaluated in a more cursory manner include use of the Silverthread roadway system or Timber Canyon Road for site access. Another entrance alternative considered is the Pine Grove Road through Steckle Park.

H. PROPERTY OWNERSHIP/ACCESS

As indicated previously in Section II.B. and on Figure 3, there are two principal property owners that own lands which affect access to oil operations on the Ferndale Ranch lease. Thomas Aquinas College owns properties that involve the Shared College/Ranch road, the Side Hill Alternative and the Drill Site No. 3 to Planning Commission Road, Ridge Alternative. In addition, Thomas Aquinas College has a "right of first refusal" upon sale of portions of the Ferndale Ranch adjacent to existing college properties.



**ACCESS ALTERNATIVES AND
PROPERTY OWNERSHIP**

Lawrence Barker Jr. owns the remaining portions of the Ferndale Ranch. As such, construction of new roads on the respective owners' properties would require permission and rights of way agreements with those owners.

Although property ownership and rights of way agreements could preclude the viability of potential access alternatives, this study assumed that the necessary agreements could be negotiated for each access concept.



ENVIRONMENTAL IMPACT REPORT (EIR) – ADDENDUM

A. BACKGROUND INFORMATION AND PROJECT DESCRIPTION:

1. **Entitlement:** Minor Modification of existing Conditional Use Permit (CUP 3344) to authorize the continued operation of 17 oil and gas wells and related production equipment and the drilling of 19 new oil and gas wells.
2. **Applicant:** Vintage Production California, LLC
3. **Property Owners:** Vintage Production California, LLC, Attention: Jim Robinson, 9600 Ming Avenue, Suite 300, Bakersfield, California 93311
4. **Location:** The project site is located in a mountainous region north of the City of Santa Paula and east of Thomas Aquinas College, 10,000 Ojai-Santa Paula Road, Santa Paula, in the unincorporated area of Ventura County.
5. **Assessor's Parcel Numbers:** 040-0-010-260, 040-0-210-080, 040-0-210-200, 040-0-060-055, and 040-0-210-070
6. **Lot Size:** 813.9 acres
7. **General Plan Land Use Designation:** Open Space and Agricultural
8. **Zoning Designation:** "OS-160 ac" (Open Space, 160 acre minimum lot size) and "AE-40 ac" (Agricultural Exclusive, 40 acre minimum lot size)
9. **Project Description:** The applicant requests that a modified CUP be granted to authorize additional oil and gas exploration and production activities within an existing oil field. The proposed project includes the following components:
 - a. The drilling, testing, reworking, maintenance and placement into production of 19 new oil and gas wells on four existing drilling pads (Drill Sites 1, 2, 3 and 7).
 - b. The continued operation of 17 existing oil and gas wells located on four existing drilling pads (Drill Sites 1, 2, 3 and 7). This operation includes well testing, reworking, maintenance and production activities.
 - c. Separation of natural gas and produced water from crude oil;
 - d. Processing activities required for on-site wastewater injection well operations; and,

- e. Operation of existing equipment associated with the storage, processing, and transportation of oil, gas, and wastewater (brine).
- f. Continued maintenance vehicle trips of 2 per day (4 one-way trips) from Monday through Saturday.

The location of the existing and proposed wells and the associated equipment located in the CUP area used to process, store and transport produced fluids is illustrated on Attachment 2 of this EIR Addendum.

The proposed project does not include any new grading or removal of vegetation. All proposed wells will be drilled on the existing drill pads (Drill Site Nos. 1-3 and 7). The existing oil facilities are accessed by a private gated road connected to State Highway 150 just east of Thomas Aquinas College. In addition to the onsite equipment located on the existing drilling pads, the facility is connected to existing pipelines that are used to transport produced fluids to an offsite facility for separation, storage and transport to market. No new pipelines for the conveyance of produced fluids to the offsite facilities are proposed. Pumping units, gathering lines, electrical connections, produced fluid tanks and ancillary equipment will continue to be used for the operation of the facility.

There is no trucking of oil & gas from the Ferndale lease. Oil and gas produced from wells drilled on the Ferndale lease is conveyed by existing pipeline to the HAMP lease, where the oil, gas and water is separated. The water is disposed of onsite at the HAMP lease, into an existing and approved injection well. The separated gas is conveyed by existing pipeline by way of the Shiells Canyon Plant and then via existing pipeline to the Santa Clara Valley Plant where it is ultimately sold into a Southern California Gas pipeline. Separated oil is shipped by existing pipeline from HAMP lease to market via the Crimson pipeline. In summary, all of the oil & gas produced on the Ferndale lease is conveyed to market by existing pipelines.

In the event of an interruption of pipeline service, produced fluids would be temporarily delivered to market by truck subject to the limitations specified in the conditions of approval of the requested CUP.

The existing equipment on the Drill Site No. 1 pad includes the following:

- Two crude oil LACT tanks (1,000 barrel capacity each)
- Two produced water tanks (1,000 barrel capacity each)
- One produced water tank (300 barrel capacity)
- One heater treater
- One vapor recovery compressor (electric)
- One gas dehydration unit
- One water filtration unit (includes backwash filter)

- One water reinjection pump
- Two 64 square foot covered sumps (approximately 300 barrel capacity each)
- One storage tank (approximately 150 barrel capacity)
- Five rod pumping units
- Eight oil and gas wells: Barker Ferndale 1, 2, 3, 4, 5, 6, Valex Ferndale 107 and 110

The existing equipment on the Drill Site No. 2 pad includes the following:

- Three rod pumping units
- Four oil and gas wells: Valex Ferndale 209, 211, 214, 215

The existing equipment on the Drill Site No. 3 pad includes the following:

- One rod pumping unit
- Two oil and gas wells: Valex Ferndale 313, and Ferndale 8

The existing equipment on the Drill Site No. 7 pad includes the following:

- Two rod pumping units
- Three oil and gas wells: Ferndale 712, 716, and 717

Hydraulic fracturing or acid well stimulation techniques subject to the draft regulations for the implementation of Senate Bill 4 are not authorized by this permit. Any such well stimulation activity requires the granting of a modification of this permit by the County of Ventura.

B. STATEMENT OF ENVIRONMENTAL FINDINGS:

On June 6, 1978, the Planning Commission certified an Environmental Impact Report (EIR) that evaluated the environmental impacts of the drilling of 30 additional oil wells from a total of five additional drill sites, for a total of 36 wells from six drill sites and a product pipeline within the permit area.

On July 9, 1985, the Board of Supervisors certified an EIR that evaluated the environmental impacts of the continued operation of 14 existing oil and gas wells, and the drilling of 22 additional wells for a total of 36 wells and related production equipment.

The proposed project is the continued use of the existing 17 wells and related facilities on existing pads and the drilling of 19 new oil and gas wells on four existing drill pads as previously approved. The project does not include any new grading or vegetation removal outside of the existing pads.

Section 15164(a) of the California Environmental Quality Act (CEQA) Guidelines (Title 14, California Code of Regulations, Chapter 3) states that the decision-making body shall prepare an addendum to a previously certified EIR if some changes or additions are necessary, but none of the conditions described in Section 15162 of the CEQA Guidelines calling for the preparation of a subsequent EIR have occurred.

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 EIR 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 oil and gas facility was previously analyzed for its potential impacts on the environment and to identify any required mitigation measures. The proposed project is comprised of the continued operation of 17 existing oil and gas wells and related production facilities and the drilling of 19 new wells on existing drill pads. The proposed new oil wells and associated facilities would be installed at the same locations as analyzed in the EIR previously prepared and certified by the County of Ventura for this oil and gas facility. All of the proposed new wells were previously authorized by the County with the granting of CUP 3543. This permit authorized a total of 36 wells. The requested permit modification would extend the drilling period specified in CUP 3543 which expired in 2011. The proposed drilling of 19 new wells does not include any physical change to the land outside of the existing disturbed drilling pads. The effects of drilling 19 new oil wells, and placing these wells on production (such as truck transport of produced fluids), are analyzed in the existing certified EIR.

Therefore, the proposed drilling of 19 new oil and gas wells on the existing drill pads will not create any new environmental impacts that were not previously analyzed in the EIR.

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

The circumstances under which the potential impacts to the environment were evaluated have not substantially changed such that the proposed drilling of 19 previously authorized oil and gas wells on existing drilling pads will require major revisions to the EIR. No new potentially significant environmental effects have

not been identified for the proposed project. The drilling of the proposed 19 oil and gas wells will not create any new impacts that were not previously analyzed in the EIR. Thus, major revisions of the previous EIR are not required.

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 the Board of Supervisors certified the previous EIR, shows any of the following:

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

No new information or environmental impacts that were unknown and could not have been known when the EIR was certified have become available. The environmental conditions that currently exist on site are substantially the same as those that existed at the time at which the EIR was certified. Therefore, the drilling of 19 new oil and gas wells on existing drill pads will not create any significant effects that were not discussed in the previous EIR.

b. Significant effects previously examined will be substantially more severe than shown in the previous EIR [§ 15162(a)(3)(B)].

No new information or environmental impacts that were unknown and could not have been known when the EIR was certified have become available. The environmental conditions that currently exist on site are substantially the same as those that existed at the time at which the EIR was certified. The environmental impacts of the proposed project are the same as when the project was previously approved. The drilling of 19 new oil and gas wells on existing drill pads will not cause any significant effect that would be substantially more severe than shown in the previous EIR.

c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative [§ 15162(a)(3)(C)].

The environmental conditions that currently exist on site are substantially the same as those that existed at the time at which the EIR was certified. The EIR did not identify any mitigation measures or alternatives as infeasible. There are no mitigation measures or alternatives that would substantially reduce the significant effects of the project that the project proponents declined to adopt. Therefore, the proposed drilling of 19 new oil and gas wells on existing drill pads will not create any significant effects that were not discussed in the previous EIR.

- d. **Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative [§15162(a)(3)(D).**

The environmental conditions that currently exist on site are substantially the same as those that existed at the time at which the EIR was certified. There are no mitigation measures or alternatives that would substantially reduce the significant effects of the project that the project proponents declined to adopt. Therefore, the proposed drilling of 19 new oil and gas wells on existing drill pads will not create any significant effects that were not discussed in the previous EIR.

A significant impact on biological resources, specifically the endangered California Condor, was not identified in the certified EIR. Since the EIR was prepared, however, new mitigation measures have been developed by the County of Ventura to minimize any adverse effects on condors. These mitigation measures were developed based on the recommendations of the U.S. Fish and Wildlife Service. Although not required to address an identified potentially significant impact, these measures (reproduced below) will be incorporated into the recommended conditions of approval of the requested permit modification as best management practices to protect this important species.

California Condor Protection BMPs

Purpose: To avoid significant impacts during drilling and ongoing operation of approved wells and facilities and ensure compatibility with conservation efforts outlined in the Recovery Plan for California Condor (April 19, 1996) and direction provided by United States Fish and Wildlife Service (USFWS) for oil and gas facilities within the range of the California Condor in Ventura County (USFWS, 2013).

Requirement: During construction and operation, the Permittee shall adhere to the following USFWS recommended California condor Best Management Practices (BMPs):

Transmission and Landing Deterrents

- a. All power lines, poles, and guy wires shall be retrofitted with raptor guards, flight diverters, and other anti-perching or anti-collision devices to minimize the potential for collision or electrocution of condors. Landing deterrents (e.g. Daddi Long Legs or porcupine wire) shall be attached to the walking beams on pumping units. New power and distribution lines shall be installed underground if determined to be necessary to avoid impacts to the California condor by the Planning Director in consultation with USFWS.

- b. All surface structures which are identified by the USFWS or County-approved qualified biologists as a risk to California condors, shall be modified (e.g. to include installation of raptor guards, anti-perching devices, landing deterrents) or relocated to reduce or eliminate the risk.

Microtrash

- c. All construction debris, food items, road kill, cigarette butts, and other trash including micro-trash (including but not limited to small items as screws, nuts, washers, nails, coins, rags, small electrical components, small pieces of plastic, glass, or wire, and anything that is colorful or shiny) will be covered or otherwise removed from a project site (including the access road) at the end of each day or prior to periods when workers are not present at the site.
- d. All hoses or cords that must be placed on the ground due to drilling operations that are outside of the primary work area (immediate vicinity of the drilling rig) will be covered to prevent California condor access. Covering will take the form of burying or covering with heavy mats, planks, or grating that will preclude access by California condors.
- e. All equipment and work-related materials (including, but not limited to, loose wires, open containers, rags, hoses, or other supplies or materials) shall be contained in closed containers either in the work area or placed inside vehicles.
- f. Poly chemical lines shall be replaced with stainless steel lines to preclude condors from obtaining and ingesting pieces of poly line.
- g. Prior to issuance of a Zoning Clearance for drilling or re-working of wells, informational signs describing the threat that micro-trash poses to condors, and the cleanup or avoidance measures being implemented, shall be posted at the site.
- h. Prior to conducting work on-site, employees and contractors shall be made aware of the California condor, and how to avoid impacts on them. Special emphasis shall be placed on keeping the well pad site free of micro-trash and other hazards.
- i. Wells pads shall be inspected closely for micro-trash on a daily basis.

Chemicals

- j. Ethylene glycol based anti-freeze or other ethylene glycol based liquid substances shall be avoided, and propylene glycol based antifreeze will be encouraged. Equipment or vehicles that use ethylene glycol based anti-freeze or other ethylene glycol based liquid substances shall be inspected daily for leaks, including (but not limited to) areas below vehicles for leaks and puddles. Standing fluid (e.g. a puddle of anti-freeze) will be remediated (e.g. cleaned up, absorbed, or covered) immediately upon discovery. Leaks shall be repaired immediately. The changing of antifreeze of any type shall be prohibited onsite.

- k. Open drilling mud, water, oil, or other liquid storage or retention structures shall be prohibited. All such structures must have netting or other covering that precludes entry or other use by condors or other listed avian species
- l. The design and location of any flaring equipment shall be subject to review and approval by the Planning Director in consultation with the USFWS.

Miscellaneous

- m. All food items and associated refuse shall be placed in covered containers that preclude access or use by California condors.
- n. All equipment and work-related materials (including loose wires, open containers, rags, hoses, or other supplies) will be placed in closed containers or inside vehicles.
- o. No dogs or other potentially predatory domesticated animals shall be allowed on the drill site unless on a leash or otherwise contained at all times.
- p. All construction equipment, staging areas, materials, and personnel shall remain within the perimeter of the disturbed area authorized under the applicable permit.
- q. The discharge of firearms at the project site or vicinity by any employee or contractor of the Permittee shall be prohibited.
- r. Feeding of wildlife by any employee or contractor working for the Permittee shall be prohibited.
- s. Access to the project site shall be made available to the representatives of the State and Federal wildlife agencies including California Department of Fish and Wildlife (CDFW) and USFWS upon request. Should a California condor be observed on-site by personnel of the Permittee, the USFWS, CDFW and the Planning Division shall be contacted immediately.
- t. Any road kill found on the access road shall be immediately cleared from the roadway and disposed.

The Permittee shall implement the BMPs listed above throughout the entire life of the project, unless modified by the County Planning Director in consultation with USFWS and CDFW. A County-approved qualified biologist shall confirm and photo-document the installation of the BMPs.

Documentation: The application shall prepare photo documentation of the complete installation of the signage and above BMPs.

Timing: Prior to the issuance of a Zoning Clearance for Construction (i.e. grading or land clearing activities), the Permittee must take the following actions:

- Install signage.

- Submit photo-documentation of the installation of the signage to the Planning Division.

Prior issuance of a Zoning Clearance for Use Inauguration (i.e. the Zoning Clearance for the drilling of first well), the Permittee must provide the Planning Division with photo documentation of the implementation of the above requirements.

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

Based on the information provided above, there is no substantial evidence to warrant the preparation of a subsequent EIR. The decision-making body shall consider this Addendum to the final EIR prior to making a decision on the project.


C. PUBLIC REVIEW:

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

Prepared by:


Jay Dobrowalski, Case Planner
Commercial and Industrial Permits Section

Reviewed by:

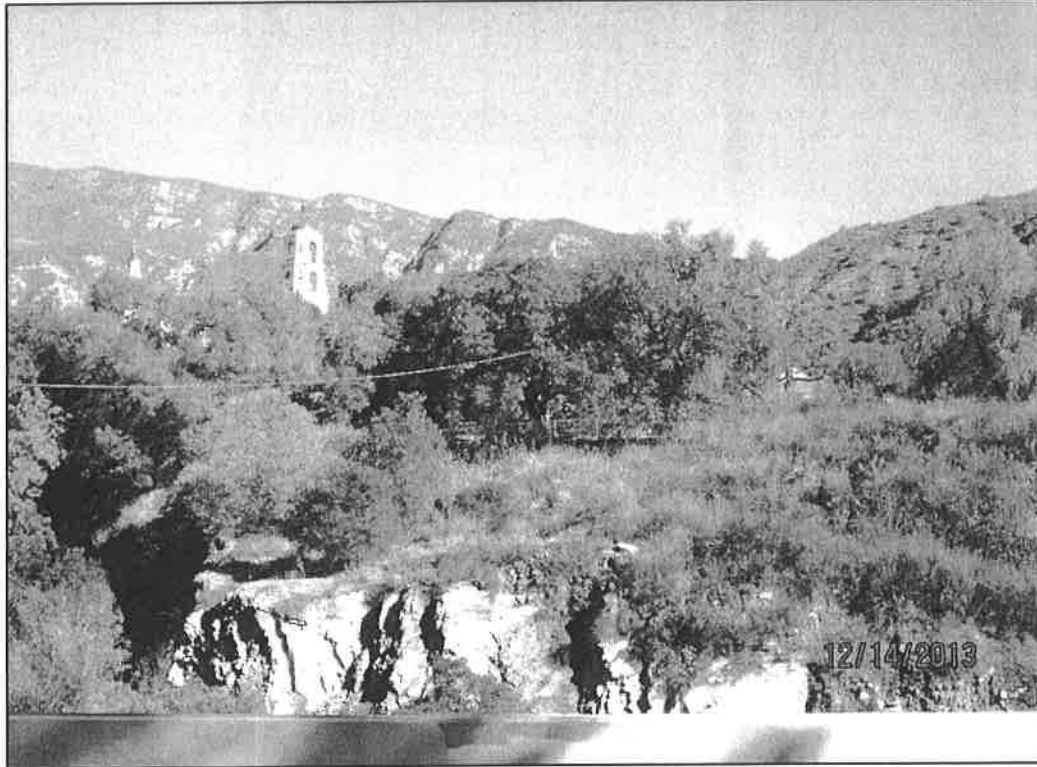

Brian R. Baca, Manager
Commercial and Industrial Permits
Section

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

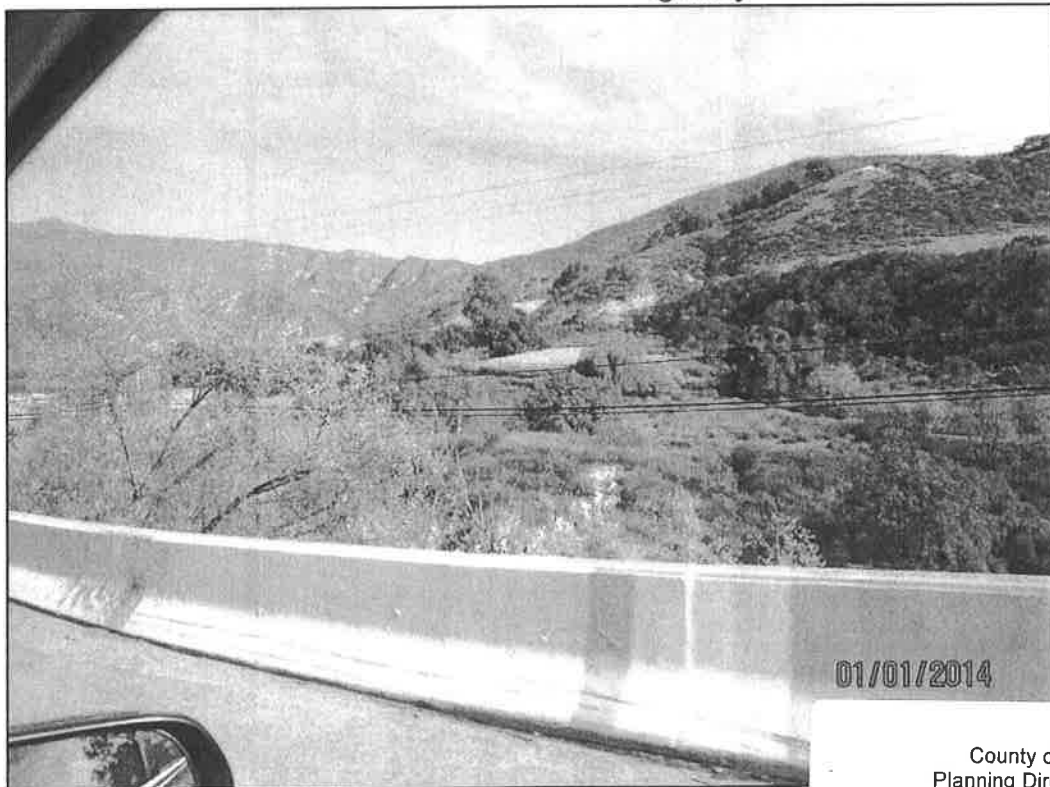
Kimberly L. Prillhart, Planning Director

Date

EXHIBIT 5
SITE PHOTOGRAPHS FOR
CONDITIONAL USE PERMIT (CUP) NO. PL13-0150



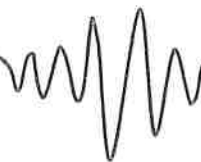
View of access road from Highway 150



View of CUP area from Highway 150

Behrens and Associates, Inc.

Acoustics, Noise and Vibration Consultants



September 18, 2013

InterAct
4567 Telephone Road, Suite 203
Ventura, CA 93003 USA

Attention: Uliana Micovic
Regulatory Services Mngr / Sr. Engineer

Subject: Ambient Sound Level Survey Report of Drill Site #1

Dear Ms. Micovic,

We have completed an ambient sound level survey at the Drill Site #1 in Santa Paula, California to document the existing ambient sound levels prior to the commencement of drilling operations. The ambient sound level survey was performed between Friday, September 12, and Monday, September 16, 2013. The survey was completed with a Bruel & Kjaer Type 2250L Hand-held Analyzer sound level meter programmed to continuously measure and calculate hourly average (1-hr LAeq) sound levels. The sound level meter was calibrated prior deployment.

The aerial image in **Attachment 1** indicates the ambient sound level survey measurement location. The measured sound level data was tabulated and is included in **Attachment 2**. Two different charts displaying the measured hourly average (1-hr LAeq) sound levels are included as **Attachment 3 and 4**. The first chart shows the hourly average (1-hr LAeq) sound levels over the five-day measurement period. The second chart shows a 24-hour overlay of the measured sound levels from the five (5) measurement days along with the calculated hourly average of the five (5) days displayed as a bold dark blue line. All sound levels are reported utilizing the A-weighted decibel scale (dBA).

Very truly yours,

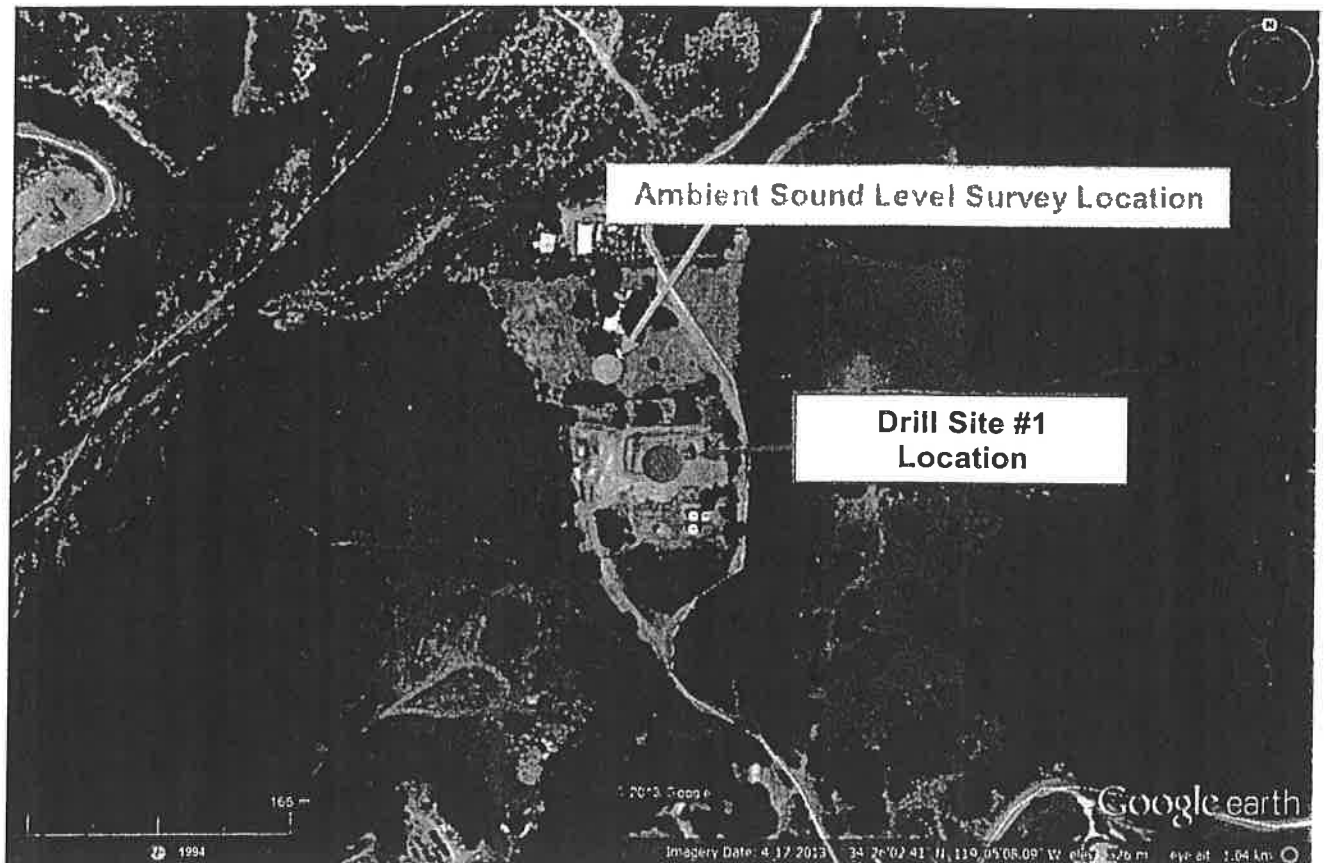
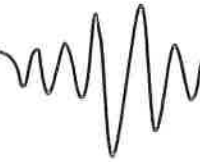
Simon Kim
Acoustical Consultant

Hawthorne, California ~ Aledo, Texas ~ Napa California ~ Mead, Colorado
Denver, Colorado ~ Pittsburg, Pennsylvania
Phone 800-679-8633 ~ Fax 310-331-1538
www.environmental-noise-control.com ~ www.drillingnoisecontrol.com

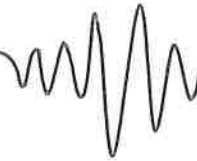
County of Ventura
Planning Director Hearing
Case # PL13-0150
Exhibit 6 – Noise Study

Behrens and Associates, Inc.

Acoustics, Noise and Vibration Consultants



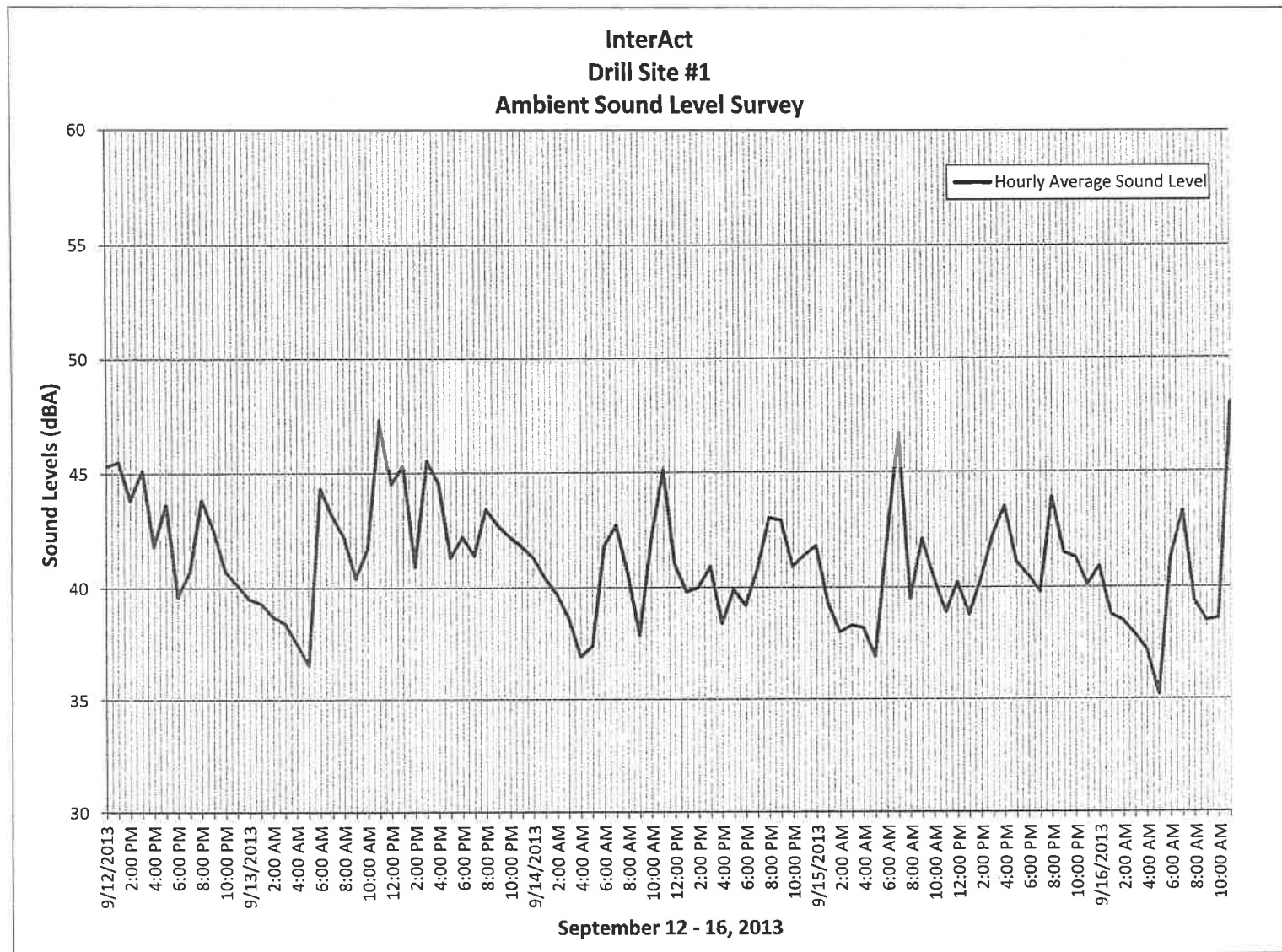
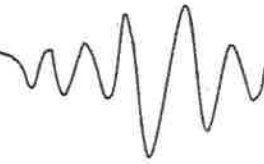
Attachment 1
Drill Site #1 Ambient Sound Level Survey Location

**Measured Sound Level Data (dBA)**

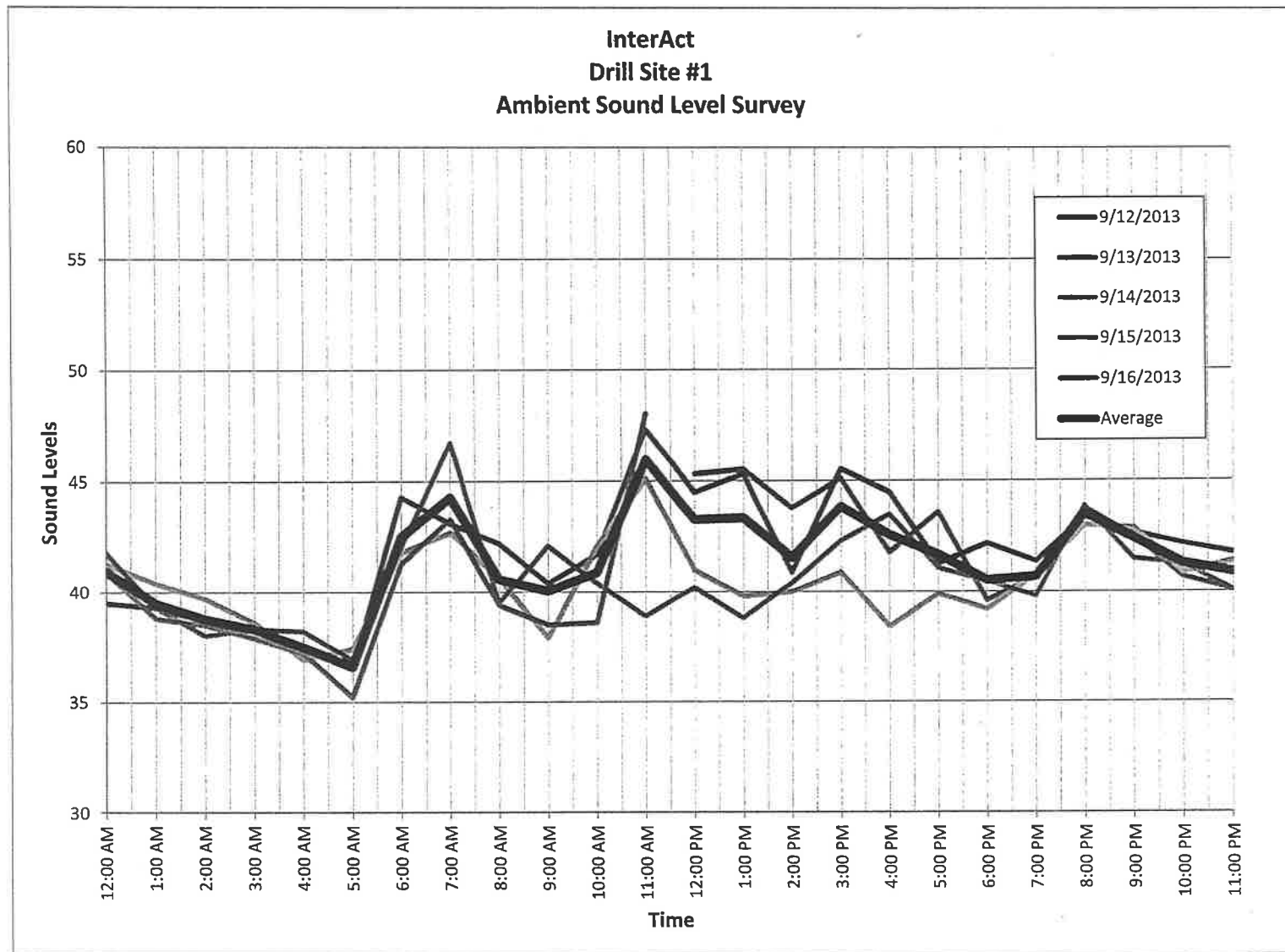
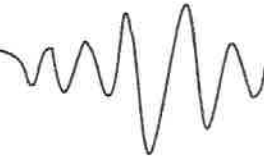
Time	9/12/2013 Thurs	9/13/2013 Fri	9/14/2013 Sat	9/15/2013 Sun	9/16/2013 Mon	Hourly Average
12:00 AM		39.5	41.3	41.8	40.9	41.0
1:00 AM		39.3	40.4	39.3	38.8	39.5
2:00 AM		38.7	39.7	38.0	38.5	38.8
3:00 AM		38.4	38.6	38.3	37.9	38.3
4:00 AM		37.5	36.9	38.2	37.2	37.5
5:00 AM		36.5	37.4	36.9	35.2	36.6
6:00 AM		44.3	41.8	42.0	41.3	42.5
7:00 AM		43.1	42.7	46.7	43.3	44.3
8:00 AM		42.2	40.6	39.5	39.4	40.6
9:00 AM		40.4	37.9	42.1	38.5	40.0
10:00 AM		41.7	42.1	40.4	38.6	40.9
11:00 AM		47.3	45.1	38.9	48.0	45.9
12:00 PM	45.3	44.5	41.0	40.2		43.3
1:00 PM	45.5	45.3	39.8	38.8		43.3
2:00 PM	43.8	40.9	40.0	40.4		41.6
3:00 PM	45.1	45.5	40.9	42.3		43.9
4:00 PM	41.8	44.5	38.4	43.5		42.6
5:00 PM	43.6	41.3	39.9	41.1		41.7
6:00 PM	39.6	42.2	39.2	40.5		40.5
7:00 PM	40.7	41.4	40.8	39.8		40.7
8:00 PM	43.8	43.4	43.0	43.9		43.5
9:00 PM	42.5	42.7	42.9	41.5		42.4
10:00 PM	40.7	42.2	40.9	41.3		41.3
11:00 PM	40.1	41.8	41.4	40.1		40.9

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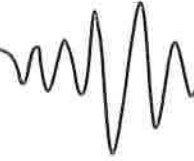
**Attachment 3
Measured Hourly Ambient Sound Levels Over 5-Day Period**



**Attachment 4
24-Hour Overlay Ambient Sound Levels from 5 Measurement Days**

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Acoustics, Noise and Vibration Consultants



September 26, 2013

InterAct
4567 Telephone Road, Suite 203
Ventura, CA 93003 USA

Attention: Uliana Micovic
Regulatory Services Mngr / Sr. Engineer

Subject: Drill Site #1 Noise Impact Computer Modeling Report

Dear Ms. Micovic,

We have completed the noise impact modeling of the planned drilling operations at Drill Site #1. The following report presents the predicted unmitigated and mitigated operational sound levels generated by the drilling rig and auxiliary equipment.

Well Site Location and Condition

The Drill Site #1 is located approximately 2,750 feet northeast of Ojai Santa Paula Road in Ventura County, California. Figure 1 contains an aerial photograph which indicates the location of Drill Site #1 and two nearby occupied sensitive uses (OSU).

Allowable Noise Levels and Noise Impact Assessment

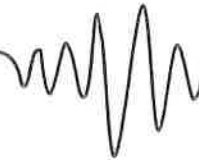
Maximum allowable noise levels described in the conditional use permit are divided by time of day and operational phase as shown below in Table 1. The allowable sound levels are to be measured at the nearby occupied sensitive uses and may be adjusted if ambient sound level measurements reveal ambient noise conditions above the allowable levels.

Table 1. Maximum Allowable Sound Levels

Time Period	Drilling and Maintenance Phase	Production Phase
Day (7:00 am to 7:00 pm)	55 dBA	45 dBA
Night (7:00 am to 7:00 pm)	45 dBA	40 dBA

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September 26, 2013

InterAct

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An ambient sound level survey was conducted by Behrens and Associates from September 12 through September 16, 2013 near Occupied Sensitive Use 1 (OSU 1). The survey results demonstrate that no hourly average sound levels (1-hr Leq) exceeded the maximum allowable average sound levels and therefore the allowable noise levels in Table 1 do not require adjustments at this location.

Compliance with the allowable noise levels will be determined by comparing the values in Table 1 with the predicted drilling noise levels. The predicted drilling noise levels will be calculated by adding the drilling noise impact modeling results to the measured ambient noise levels. To establish a worst case scenario, the highest ambient daytime hourly average of 48.0 dBA and the highest ambient nighttime hourly average of 44.3 dBA will be used in the analysis.

Sound Modeling Instrumentation

The noise impact modeling was completed with Brüel & Kjær Predictor Version 9.01 software which meets ISO 9613.1/2 compliance requirements. The projected operational sound levels of the activities at the site were modeled while taking into consideration the topographical features and ground cover of the site and adjacent surroundings. On-site operational sound levels, including frequency spectrums, measured at numerous similar drilling operations were used as the foundation of the model.

Sound Modeling Results

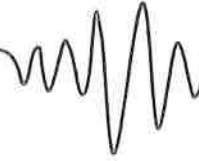
Figure 2 identifies the modeled drill rig layout at the proposed Drill Site #1. The isoauditory map in Figure 3 shows the predicted unmitigated drilling noise impact levels. The predicted unmitigated noise impact levels of the drilling operations are 60.9 dBA at OSU 1 and 47.7 dBA at OSU 2.

The unmitigated drilling noise impact level at OSU 1 added to the highest measured hourly average daytime ambient sound level is 61.1 dBA which exceeds the daytime drilling phase allowable average sound level by 6.1 dBA. The unmitigated drilling noise impact level at OSU 1 added to the measured highest hourly average nighttime ambient sound level is 61.0 dBA which exceeds the nighttime drilling phase allowable average sound level by 16.0 dBA.

Figure 4 identifies the drill rig equipment and the acoustical mitigation system layout used in the noise impact modeling. The resulting isoauditory map presented in Figure 5 shows the predicted mitigated drilling noise impact levels with a 32-foot high acoustical barrier wall, 12-foot high freestanding acoustical panels, 10-foot high acoustical walls for the mud pumps and the rig floor, and acoustical blankets for the shaker/centrifuge.

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September 26, 2013

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The predicted mitigated noise impact levels of the drilling operations are 49.8 dBA at OSU 1 and 39.7 dBA at OSU 2. The mitigated drilling noise impact at OSU 1 added to the measured highest hourly average daytime ambient sound level is 52.0 dBA which is below the daytime drilling phase allowable average sound level. The mitigated drilling noise impact at OSU 1 added to the measured highest hourly average nighttime ambient sound level is 50.9 dBA which exceeds the nighttime drilling phase allowable average sound level by 5.9 dBA.

The predicted daytime and nighttime drilling sound levels for both unmitigated and mitigated scenarios are provided in Tables 2 and 3.

Table 2. Predicted unmitigated drilling sound levels at OSU 1

	Highest Daytime Hourly Average Ambient Sound Level (dBA)	Predicted Unmitigated Drilling Noise Impact (dBA)	Daytime Ambient + Predicted Unmitigated Noise Impact (dBA)	Highest Nighttime Hourly Average Ambient Sound Level (dBA)	Predicted Unmitigated Drilling Noise Impact (dBA)	Nighttime Ambient + Predicted Unmitigated Noise Impact (dBA)
Occupied Sensitive Use 1	48.0	60.9	61.1	44.3	60.9	61.0

Table 3. Predicted mitigated drilling sound levels at OSU 1

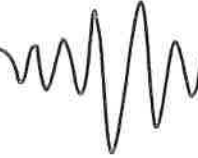
	Highest Daytime Hourly Average Ambient Sound Level (dBA)	Predicted Mitigated Drilling Noise Impact (dBA)	Daytime Ambient + Predicted Mitigated Noise Impact (dBA)	Highest Nighttime Hourly Average Ambient Sound Level (dBA)	Predicted Mitigated Drilling Noise Impact (dBA)	Nighttime Ambient + Predicted Mitigated Noise Impact (dBA)
Occupied Sensitive Use 1	48.0	49.8	52.0	44.3	49.8	50.9

Conclusion and Recommendations

The highest daytime hourly average ambient sound level measured in the vicinity of the OSU 1 was 48.0 dBA between 11 a.m. and 12 p.m. on Friday September 16, 2013. The highest nighttime hourly average ambient sound level was 44.3 dBA between 6 a.m. and 7 a.m. on Monday September 13, 2013 as described in the previously submitted ambient sound level survey report. To simulate a worst-case scenario, these maximum values were utilized in this report when calculating the predicted drilling noise levels.

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September 26, 2013

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The predicted unmitigated drilling noise impact levels added to the measured highest ambient sound levels exceeded the daytime allowable average sound level by 6.1 dBA and the nighttime allowable average sound level by 16.0 dBA at OSU 1. To reduce the drilling noise impact, we recommend that a 520-foot long, 32-foot high acoustically rated barrier wall with a sound transmission class (STC) rating of at least 25 be installed during drilling activities. In addition to the acoustical wall, noise mitigation implemented around the auxiliary equipment should include 12-foot high freestanding acoustical panels, 10-foot high acoustical walls for the mud pumps and the rig floor, and acoustical blankets for the shaker/centrifuge. Implementing these noise mitigation measures will lower the predicted daytime mitigated sound levels under the allowable level.

Very truly yours,

Simon Kim
Acoustical Consultant

Attachments

Behrens and Associates, Inc.

Acoustics, Noise and Vibration Consultants

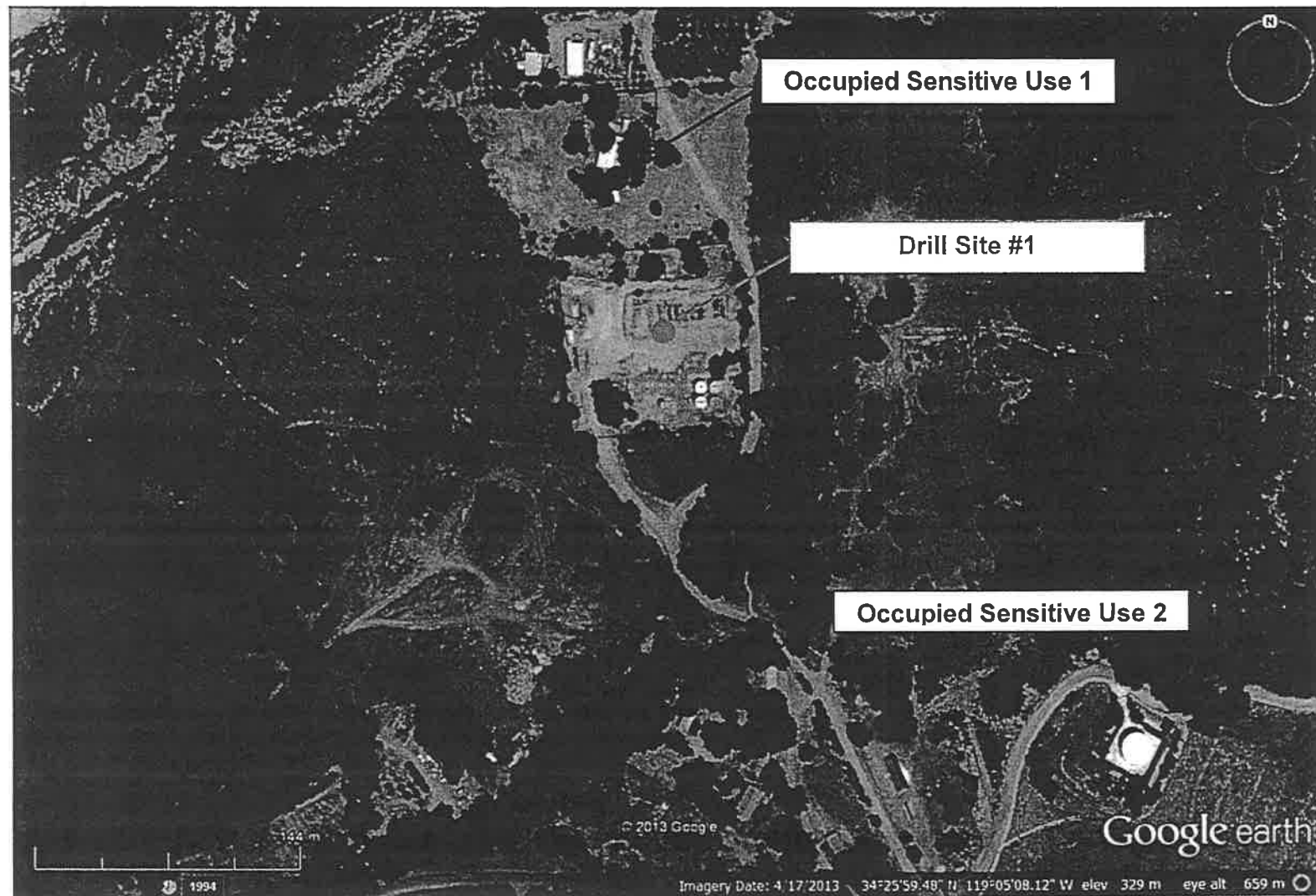


Figure 1 – Drill Site #1 and Adjacent Occupied Sensitive Uses

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Acoustics, Noise and Vibration Consultants



Figure 2 - Drilling Rig Equipment Configuration Layout

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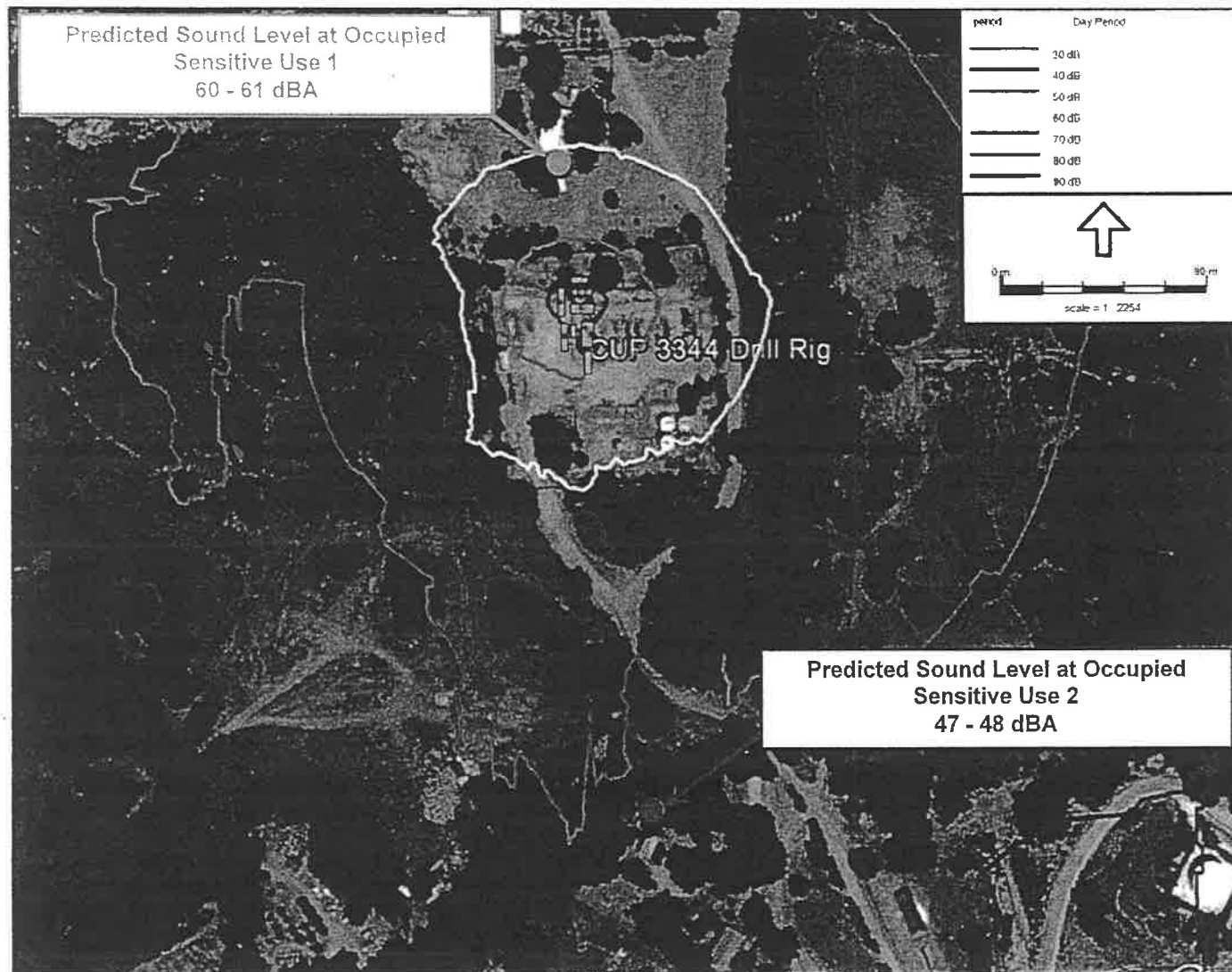


Figure 3 – Predicted Unmitigated Drill Site #1 Drilling Operation Sound Level Isoauditory Map

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Acoustics, Noise and Vibration Consultants

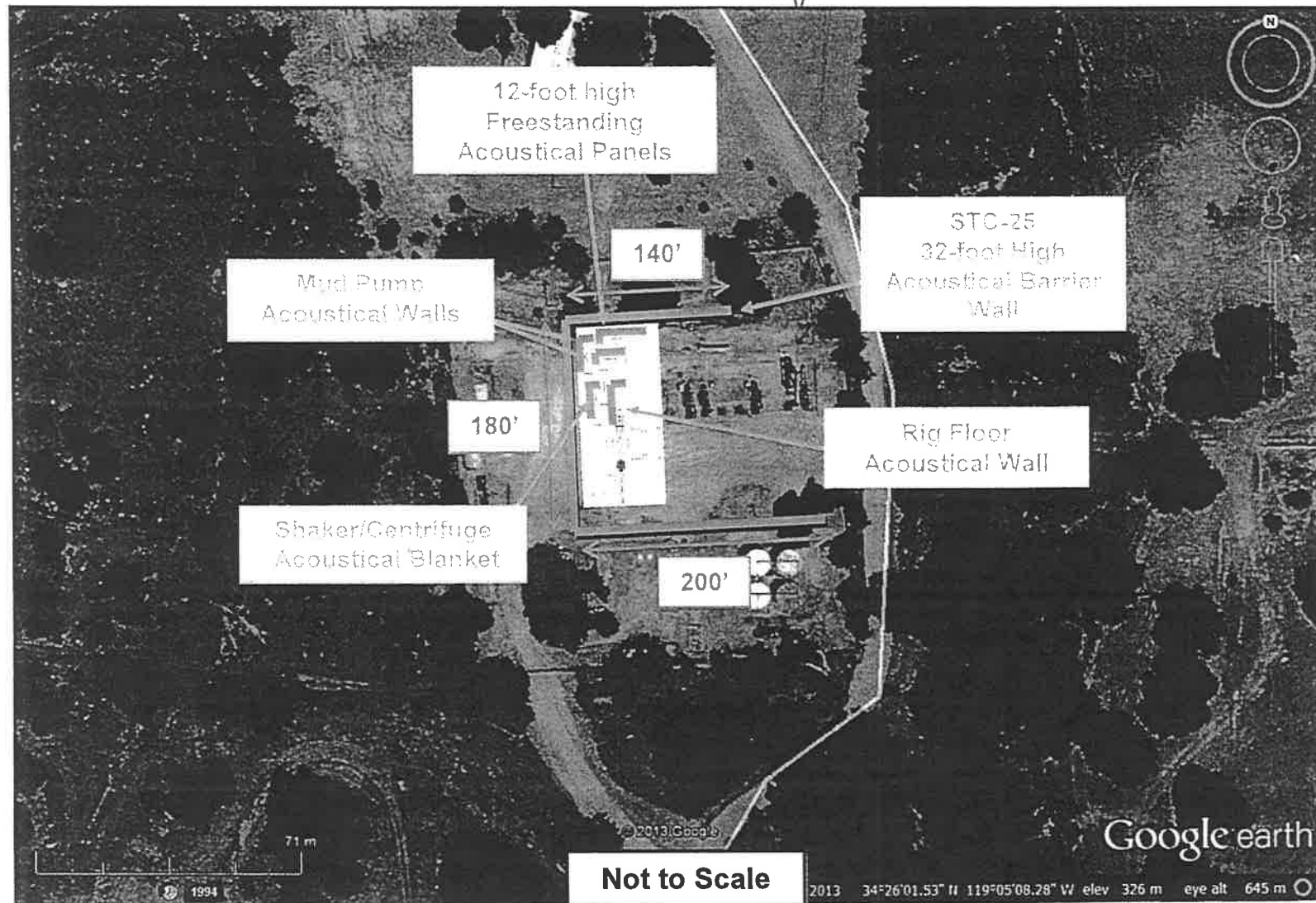


Figure 4 – Drilling Rig Equipment and Acoustical Mitigation Systems Configuration Layout

Behrens and Associates, Inc.

Acoustics, Noise and Vibration Consultants

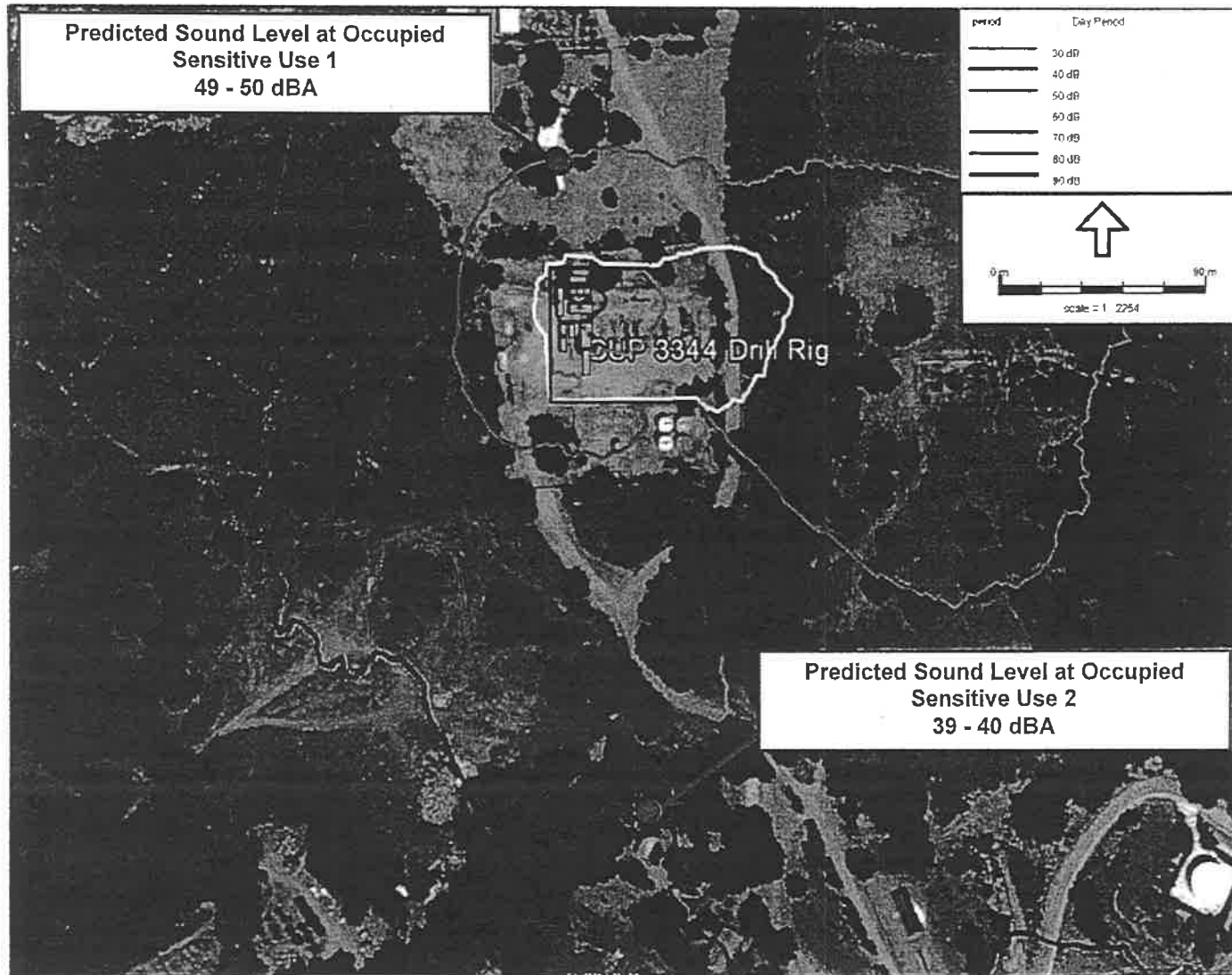
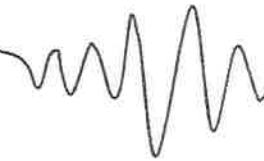


Figure 5 – Predicted Mitigated Drill Site #1 Drilling Operation Sound Level Isoauditory Map



Effect of Wind on Sound Levels

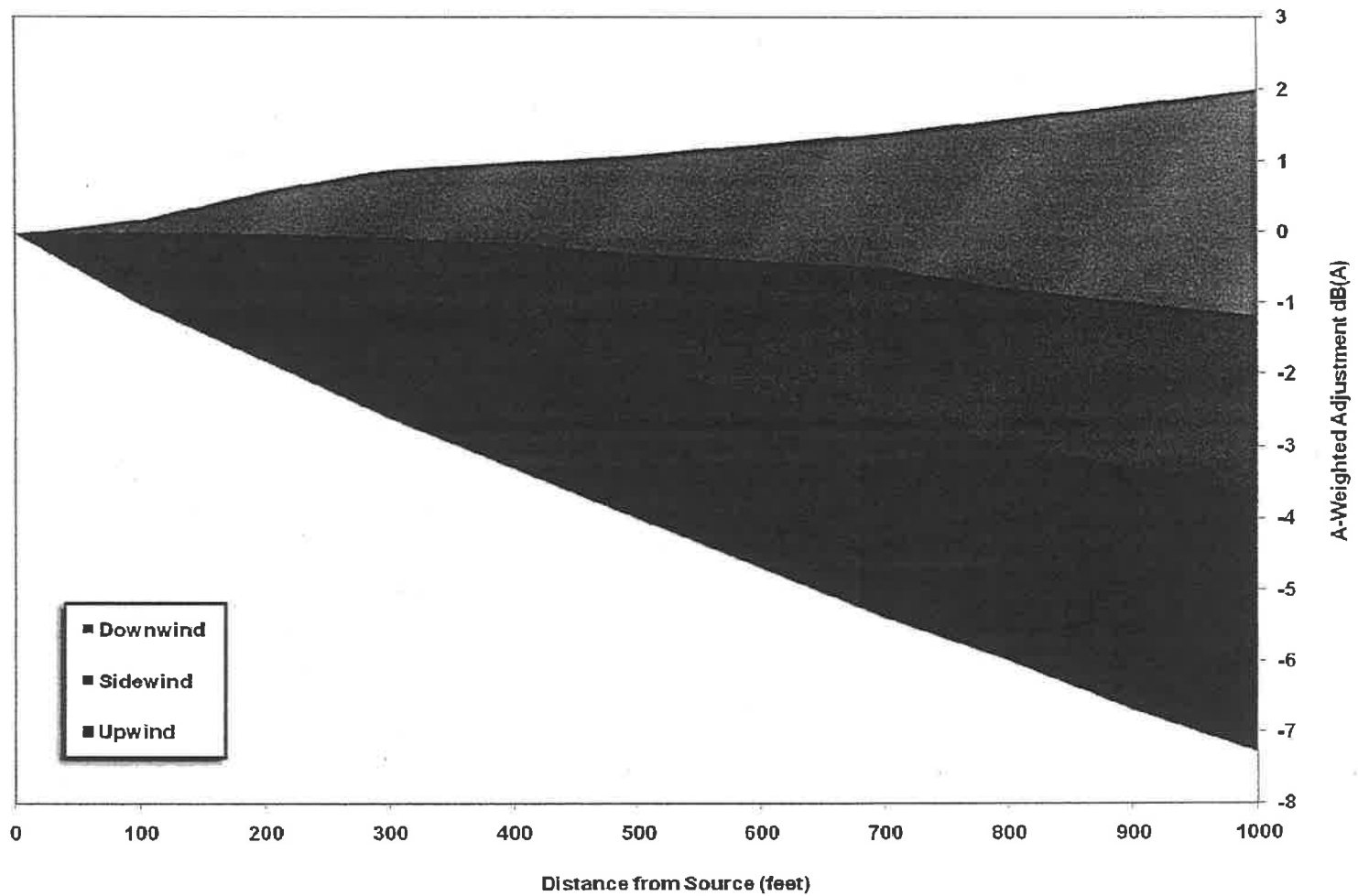


Figure 6 – The effect of wind on sound level chart

EXHIBIT 7 CONDITIONS OF APPROVAL FOR CONDITIONAL USE PERMIT (CUP) NO. PL13-0150

RESOURCE MANAGEMENT AGENCY (RMA) CONDITIONS

I. Planning Division Conditions

1. Project Description

The applicant requests that a modified CUP be granted to authorize additional oil and gas exploration and production activities within an existing oil field. The proposed project includes the following components:

- a. The drilling, testing, reworking, maintenance and placement into production of 19 new oil and gas wells on four existing drilling pads (Drill Sites 1, 2, 3 and 7).
- b. The continued operation of 17 existing oil and gas wells located on four existing drilling pads (Drill Sites 1, 2, 3 and 7). This operation includes well testing, reworking, maintenance and production activities.
- c. Separation of natural gas and produced water from crude oil;
- d. Processing activities required for on-site wastewater injection well operations; and,
- e. Operation of existing equipment associated with the storage, processing, and transportation of oil, gas, and wastewater (brine).
- f. Continued maintenance vehicle trips of 2 per day (4 one-way trips) from Monday through Saturday.

The location of the existing and proposed wells and the associated equipment located in the CUP area used to process, store and transport produced fluids is illustrated on Attachment 2 of the EIR Addendum.

The proposed project does not include any new grading or removal of vegetation. All proposed wells will be drilled on the existing drill pads (Drill Site Nos. 1-3 and 7). The existing oil facilities are accessed by a private gated road connected to State Highway 150 just east of Thomas Aquinas College. In addition to the onsite equipment located on the existing drilling pads, the facility is connected to existing pipelines that are used to transport produced fluids to an offsite facility for separation, storage and transport to market. No new pipelines for the conveyance of produced fluids to the offsite facilities are proposed. Pumping units, gathering lines, electrical connections, produced fluid tanks and ancillary equipment will continue to be used for the operation of the facility.

There is no trucking of oil & gas from the Ferndale lease. Oil and gas produced from wells drilled on the Ferndale lease is conveyed by existing pipeline to the HAMP lease, where the oil, gas and water is separated. The water is disposed of onsite at the HAMP lease, into an existing and approved injection well. The separated gas is conveyed by

existing pipeline by way of the Shiells Canyon Plant and then via existing pipeline to the Santa Clara Valley Plant where it is ultimately sold into a Southern California Gas pipeline. Separated oil is shipped by existing pipeline from HAMP lease to market via the Crimson pipeline. In summary, all of the oil & gas produced on the Ferndale lease is conveyed to market by existing pipelines.

Note: for details regarding the temporary trucking of products, see Condition of Approval No. 39.

The existing equipment on the Drill Site No. 1 pad includes the following:

- Two crude oil LACT tanks (1,000 barrel capacity each)
- Two produced water tanks (1,000 barrel capacity each)
- One produced water tank (300 barrel capacity)
- One heater treater
- One vapor recovery compressor (electric)
- One gas dehydration unit
- One water filtration unit (includes backwash filter)
- One water reinjection pump
- Two 64 square foot covered sumps (approximately 300 barrel capacity each)
- One storage tank (approximately 150 barrel capacity)
- Five rod pumping units
- Eight oil and gas wells: Barker Ferndale 1, 2, 3, 4, 5, 6, Valex Ferndale 107 and 110

The existing equipment on the Drill Site No. 2 pad includes the following:

- Three rod pumping units
- Four oil and gas wells: Valex Ferndale 209, 211, 214, 215

The existing equipment on the Drill Site No. 3 pad includes the following:

- One rod pumping unit
- Two oil and gas wells: Valex Ferndale 313, and Ferndale 8

The existing equipment on the Drill Site No. 7 pad includes the following:

- Two rod pumping units
- Three oil and gas wells: Ferndale 712, 716, and 717

Hydraulic fracturing or acid well stimulation techniques subject to the draft regulations for the implementation of Senate Bill 4 are not authorized by this permit. Any such well stimulation activity requires the granting of a modification of this permit by the County of Ventura.

2. Site Maintenance

Purpose: To ensure that the CUP area is maintained in a neat and orderly manner so as not to create any hazardous conditions or unsightly conditions which are visible from outside the CUP area.

Requirement: The Permittee shall maintain the project site in compliance with the described uses outlined in Condition No. 1 (Permitted Land Uses). Only equipment and/or materials which the Planning Director determines to substantially comply with Condition No. 1 (Permitted Land Uses), or which are authorized by any subsequent amendments to this CUP, shall be stored on the property during the life of this CUP. Any project related equipment shall not be visible from Highway 150.

Documentation: Pursuant to Condition No. 1 (Permitted Land Uses), the CUP and any amendments thereto.

Timing: Prior to occupancy and 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*.

3. CUP Modification

Prior to the redrilling of an existing well or 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.

4. Construction Activities

Prior to any construction, the Permittee shall obtain a Zoning Clearance for construction from the Planning Division, and a Building Permit from the Building and Safety Division. Prior to any grading, the Permittee shall obtain a Grading Permit from the Public Works Agency.

5. 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 constitute the Permittee's formal agreement to comply with 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 the *Ventura County Non-Coastal Zoning Ordinance* (2010, Article 14), which shall include, but is not limited to, the following:

- 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 deed to the subject property;
- e. The imposition of civil administrative penalties; and/or
- f. Revocation of this CUP.

The Permittee is responsible for being aware of and complying with the CUP conditions and all applicable federal, state and local laws and regulations.

6. Time Limits

a. Use inauguration:

- i. The approval decision for this CUP becomes effective upon the expiration of the 10 day appeal period following the approval decision, or when any appeals of the decision are finally resolved. Once the approval decision becomes effective, the Permittee must obtain a Zoning Clearance for use inauguration in order to initiate the land uses provided in Condition No. 1 (Project Description).
- ii. This CUP shall expire and become null and void if the Permittee fails to obtain a Zoning Clearance for use inauguration within one year (*Ventura County Non-Coastal Zoning Ordinance 2005, § 8111-4.7*) from the granting or approval of this CUP. The Planning Director may grant a one year extension of time to the Permittee in order to obtain the Zoning Clearance for use inauguration 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 time extension in writing at least 30 days prior to the one year expiration date.
- iii. Prior to the issuance of the Zoning Clearance for use inauguration, all fees and charges billed to that date by any County agency, as well as any fines, penalties, and sureties, must be paid in full. After issuance of the Zoning Clearance for use inauguration, any final billed processing fees must be paid within 30 days of the billing date or the County may revoke this CUP.

b. Permit Life or Operations Period:

This CUP will expire on [INSERT DATE]. 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:

1. The Permittee has filed a permit modification application pursuant to Section 8111-6 of the Ventura County Non-Coastal Zoning Ordinance prior to [INSERT DATE]; and
2. 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.

7. Consolidation of All Approved Exhibits and Permits

Purpose: To ensure compliance with and notification of requirements of other federal, state or local government regulatory agencies.

Requirement: The Permittee shall provide the Planning Division with documentation to verify that the Permittee has obtained or satisfied all applicable federal, state and local entitlements and conditions.

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 for the project file.

Timing: The documentation shall be submitted to the Planning Division prior to the issuance of the Zoning Clearance for use inauguration or as dictated by the respective agency.

Monitoring and Reporting: The Planning Division maintains the documentation provided by the Permittee in the respective project file. In the event that the permit is modified or changes are made by any other respective agency, the Permittee shall submit any revised documentation within 30 days of the modification.

8. Notice of CUP Requirements and Retention of CUP Conditions On-Site

Purpose: To ensure full and proper notice of permit requirements and conditions affecting the use of the subject property.

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 regularly dealing with the daily operation of the proposed activities, of the pertinent conditions of this CUP.

Documentation: The Permittee shall present to the Planning Division copies of the conditions, upon the Planning Division's request.

Timing: Prior to issuance of a Zoning Clearance for use inauguration and until expiration of the CUP.

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*.

9. 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 shall be recorded on the deed of the subject property that describes the responsibilities of the Property Owner and Permittee for compliance with applicable permit conditions and regulations.

Requirement: The Permittee and Property Owner of record 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 tax assessor's parcel that is subject to this CUP.

Documentation: Recorded Notice of Land Use Entitlement.

Timing: Prior to the issuance of a Zoning Clearance for use inauguration.

Monitoring and Reporting: The Permittee shall return a copy of the recorded Notice of Land Use Entitlement to the Planning Division for the project file.

10. Condition Compliance, Enforcement, and Other Responsibilities

- a. **Cost Responsibilities:** The Permittee shall bear the full costs of all staff time, material costs, or consultant costs associated with the approval of studies, generation of studies or reports, on-going permit compliance, and monitoring programs as described below in Condition 12b. Specifically, the Permittee shall bear the full costs of the following:
 - i. condition compliance costs which include, but are not limited to, staff time, material costs, or consultant costs associated with the approval of studies, generation of studies or reports, ongoing permit condition compliance review, and CEQA Mitigation Monitoring/other monitoring programs; and,
 - ii. monitoring and enforcement costs required by the *Ventura County Non-Coastal Zoning Ordinance (2010, §8114-3)*. The Permittee, or the Permittee's successors-in-interest, shall bear the full costs incurred by the County or its contractors for inspection and monitoring, and for enforcement activities related to the resolution of confirmed violations. Enforcement activities shall be in response to confirmed violations and may include such measures as inspections, public reports, penalty hearings, forfeiture of securities, and suspension of this CUP. Costs will be billed at the contract rates in effect at the time enforcement actions are required. The Permittee shall be billed for said costs and penalties pursuant to the *Ventura County Non-Coastal Zoning Ordinance (§8114-3.4)*.

- b. Establishment of Revolving Compliance Accounts: Within 10 calendar days of the effective date of the decision on this CUP, the Permittee, or the Permittee's successors-in-interest, shall submit the following deposit and reimbursement agreement to the Planning Director:
 - i. a payment of \$500.00 for deposit into a revolving condition compliance and enforcement account to be used by the Planning Division to cover costs incurred for Condition Compliance review (Condition 12a, above), monitoring and enforcement (Condition 12c, below) may be modified to a higher amount by mutual agreement between the Permittee and the Planning Director; and,
 - ii. a signed and fully executed County RMA reimbursement agreement, which is subject to the Permittee's right to challenge any charges obligating the Permittee to pay all Condition Compliance review, monitoring, and enforcement costs.
- c. Monitoring and Enforcement Costs: The \$500.00 [see Condition 12b, above] deposit and reimbursement agreement are required to ensure that funds are available for legitimate and anticipated costs incurred for Condition Compliance. All permits issued by the Planning Division may be reviewed and the sites inspected no less than once every three years, unless the terms of the permit require more frequent inspections. These funds shall cover costs for any regular compliance inspections or the resolution of confirmed violations of the conditions of this CUP and/or the *Ventura County Non-Coastal Zoning Ordinance* that may occur.
- d. Billing Process: The Permittee shall pay any written invoices from the Planning Division within 30 days of receipt of the request. Failure to pay the invoice shall be grounds for suspension, modification, or revocation of this CUP. The Permittee shall have the right to challenge any charge prior to payment.

11. Defense and Indemnity

As a condition of CUP issuance and use including adjustment, modification, or renewal thereof, the Permittee agrees to:

- a. Defend, at the Permittee's sole expense, against any claim, action or proceeding brought against the County by a third party challenging either the County's decision to issue this CUP or the manner in which the County is interpreting or enforcing the conditions of this CUP. The County shall promptly notify Permittee of any such claim, action or proceeding and shall cooperate fully in the defense.
- b. Indemnify the County against any settlements, awards, or judgments, including attorney's fees, arising out of, or resulting from, any claim, action or proceeding described in Section 11(a) above. Upon written demand from the County, the Permittee shall reimburse the County for any and all court costs and/or attorney's fees which the County may be required by a court to pay as a result of any such claim, action or proceeding the Permittee defended pursuant to Section 11(a) above. The County may, at its sole

discretion, participate in the defense of any such claim, action or proceeding through its own legal counsel, but such participation shall not relieve the Permittee of the Permittee's obligations under this condition.

- c. Except with respect to claims arising from the County's sole negligence or intentional misconduct, the Permittee shall also indemnify, defend, and hold harmless the County, its officers, agents, and employees from any and all claims, actions, proceedings, demands, costs, and expenses, including attorney's fees, judgments, fines or liabilities arising out of the construction, maintenance, or operations described in Condition No. 1 (Permitted Land Uses), as it may be subsequently modified pursuant to the conditions of this CUP. The County shall promptly notify Permittee of any such claim, action or proceeding and shall cooperate fully in the defense. The County may, at its sole discretion, participate in the defense of any such legal action through its own legal counsel, but such participation shall not relieve the Permittee of the Permittee's obligations under this condition.
- d. Neither the issuance of this CUP, nor compliance with the conditions thereof, 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 County, its officers, or employees for injury or damage to persons or property.

12. Invalidation of Condition(s)

If any of the conditions or limitations of this CUP are held to be invalid in whole or in part by a court of competent jurisdiction, that holding shall not invalidate any of the remaining CUP conditions or limitations. In the event that any condition imposing a fee, exaction, dedication, or other mitigation measure is challenged by the Permittee in an action filed in a court of competent jurisdiction, or threatened to be filed therein, the Permittee shall be required to fully comply with this CUP, including without limitation, by remitting the fee, exaction, dedication, and/or by otherwise performing all mitigation measures being challenged. This CUP shall continue in full force unless, until and only to the extent invalidated by a final, binding judgment issued in such action.

If a court of competent jurisdiction invalidates any condition in whole or in part, and the invalidation would change the findings and/or the mitigation measures associated with the approval of this CUP, at the discretion of the Planning Director, the Planning Commission may review the project and impose substitute feasible conditions/mitigation measures to adequately address the subject matter of the invalidated condition. The Planning Commission shall make the determination of adequacy. 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.

13. 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 County will use the lowest bidder. Any decisions made by County staff in reliance on consultant or contractor work 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.

14. Relationship of CUP Conditions, Laws and Other Permits

The Permittee shall design, maintain, and operate the CUP area and any facilities thereon in compliance with all applicable requirements and enactments of Federal, State, and County authorities. In the event of conflict between various requirements, the more restrictive requirements shall apply. In the event the Planning Director determines that any CUP condition contained herein is in conflict with any other CUP condition contained herein, when 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.

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, 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 and regulatory licenses shall be obtained for operation of oil and gas production facilities.

15. Contact Person

Purpose: To designate a person responsible for responding to complaints.

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. The designated contact person shall be available, via telecommunication, 24 hours a day.

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 or phone number of the Permittee's field agent(s) should change, or the responsibility is assigned to another person, the Permittee shall provide the Planning Division with the new information in writing within three calendar days of the change in the Permittee's field agent.

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*.

16. 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. 15 in a visible location on the site. The Contact Person shall be available via telephone on a 24-hour basis. Persons with concerns about a use as it is occurring may directly contact the Contact Person;
- b. If a written complaint about this CUP is received by the County, Planning staff will contact the Permittee's Contact Person or the Permittee to request information regarding the alleged violation; and,
- 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.

17. Reporting of Major Incidents

Purpose: To ensure that the Planning Director is notified of major incidents within the CUP area.

Requirement: The Permittee shall immediately notify the Planning Director by telephone, email, FAX, and/or voicemail of any incidents (e.g., fires, explosions, spills, landslides, or slope failures) that could pose a hazard to life or property inside or outside the CUP area.

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.

18. Change of Owner and/or Permittee

Purpose: To ensure that the Planning Division is properly and promptly notified of any change of ownership or change of Permittee affecting the CUP site.

Requirement: The Permittee shall file, as an initial 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). Permittee shall provide the Planning Director with a final notice once the transfer of ownership and/or operational control has occurred.

Documentation: The initial notice must be submitted with new Property Owner's and/or Permittee's contact information. The final 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 10 calendar days prior to the change of ownership or change of Permittee. The Permittee shall provide the final notice to the Planning Director within 15 calendar days of the effective date of the transfer.

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*.

19. Paleontological Resources Inadvertently Discovered During Grading

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

Requirement: If any paleontological remains are uncovered during ground disturbance or construction activities, the Permittee shall:

- a. Cease operations and assure the preservation of the area in which the discovery was made;
- b. Notify the Planning Director in writing, within three days of the discovery;
- c. 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;

- d. Obtain the Planning Director's written concurrence of the recommended disposition before resuming development; and,
- e. Implement the agreed upon recommendations.

Documentation: Permittee shall submit the reports prepared by the paleontologist or geologist. Additional documentation may be required to demonstrate that the Permittee has implemented any recommendations made by in the paleontological report.

Timing: 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.

20. Archaeological Resources Inadvertently Discovered During Grading

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

Requirement: The Permittee shall implement the following procedures:

- a. 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; and,
 - iv. Obtain the Planning Director's written concurrence of the recommended disposition before resuming development.
- b. 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; and,
 - iv. Obtain the Planning Director's written concurrence of the recommended disposition before resuming development on-site.

Documentation: If archaeological remains are encountered, the Permittee shall submit a report prepared by a County-approved archaeologist including 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 archaeologists report.

Timing: 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.

21. 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 prepared by 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.

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.

22. 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 unused 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.

Documentation: If needed, the Permittee shall obtain the Planning Director's written authorization to remove the equipment after the 30-day 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 for a time extension to the 30 day deadline, prior to the end of the 30 day period.

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*.

23. 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 plan for controlling oil spillage and preventing saline or other polluting or contaminating substances from reaching surface or subsurface waters;
- b. provide a plan that is consistent with requirements of County, state and federal laws;
- c. prepare a containment plan that shows containment of any and all oil, produced water, drilling fluids, cuttings and other contaminants associated with the drilling, production, storage and transport of oil on the site unless properly transported off-site, injected into a well, treated or re-used in an approved manner on-site or, if allowed, off-site;
- d. secure all appropriate permits, permit modifications or approvals when necessary, prior to treatment or re-use of oil field waste materials; and,
- e. submit the containment plan to the Planning Division prior to issuance of a Zoning Clearance.

Documentation: The Permittee shall submit a containment plan to the Planning Division for review and approval.

Timing: The Permittee shall obtain approval of the Planning Division for the plan prior to issuance of a Zoning Clearance.

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*.

24. Dust Prevention and Road Maintenance

Purpose: In order to comply with § 8107-5.6.6 of the *Ventura County Non-Coastal Zoning Ordinance* and to ensure pollutants are handled appropriately.

Requirement: 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 submit a written dust control plan to the Planning Division for review and approval.

Timing: Prior to the issuance of a Zoning Clearance, the Permittee shall obtain approval of the dust control plan.

Monitoring and Reporting: The Planning Division shall review and approve the dust control plan prior to the issuance of a Zoning Clearance. A copy of the approved dust control plan shall be maintained in the project file. The Planning Director may require that additional dust control measures are added to the plan at any time if the Planning Director determines it necessary. 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*.

25. Lighting Plan

Purpose: To ensure lighting on the subject property is provided in compliance with § 8107-5.67 of the *Ventura County Non-Coastal Zoning Ordinance* and to ensure that lighting:

- a. avoids interference with the reasonable use of adjoining properties;
- b. avoids conflict with landscape features;
- c. minimizes on-site and eliminates off-site glare;
- d. provides adequate on-site lighting for security;
- e. minimizes impacts to wildlife movement;
- f. minimizes energy consumption; and,
- g. includes devices that are compatible with the design of the permitted facility and minimize energy consumption.

Requirement: For any new permanent lighting, the Permittee shall prepare a lighting plan. The lighting plan must comply with the following:

- a. the lighting plan shall be prepared by an electrical engineer registered by the State of California;
- b. the lighting plan shall include a photometric plan and manufacturer's specifications for each exterior light fixture type (e.g., light standards, bollards, and wall mounted packs);
- c. the lighting plan shall provide illumination information within parking areas, pathways, streetscapes, and open spaces proposed throughout the development;
- d. in order to minimize light and glare on the project property, all light fixtures shall be high cut-off type that divert lighting downward onto the property and shall not cast light on any adjacent property or roadway; and,
- e. light emanation shall be controlled so as not to produce excessive levels of glare or abnormal light levels directed at any neighboring uses. Lighting shall be kept to a minimum to maintain the normal night-time light levels in the area, but not inhibit adequate and safe working light levels.
- f. The Permittee shall bear the total cost of the review and approval of the lighting plan, and shall install all elements of the approved lighting plan according to the approved Lighting Plan.

Documentation: The Permittee submit the lighting plan to the Planning Division for review and approval.

Timing: Prior to the issuance of a Zoning Clearance for construction for drilling any new well the Permittee shall obtain approval of the lighting plan. The Permittee shall maintain the lighting as approved in the lighting plan for the life of the permit.

Monitoring and Reporting: The Planning Division shall maintain a stamped copy of the approved lighting plan in the project file. The Building and Safety inspector and Planning Division staff have the authority to ensure that the lighting is installed according to the approved lighting plan prior to the issuance of a Certificate of Occupancy. 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. Painting of Permanent Facilities, Structures and Pipelines

Purpose: In order to ensure that buildings and structures comply with the Oil Development Standards of § 8107-5.6.9 of the *Ventura County Non-Coastal Zoning Ordinance* and blend in with their natural surroundings.

Requirement: The Permittee shall:

- a. provide the specifications for all pumping equipment and ancillary equipment (e.g., tanks, equipment in cabinets, and pipes) on all development plans;

- b. construct and maintain the exterior surfaces of all buildings and structures using building materials and colors that are compatible with surrounding terrain (e.g., earth tones and non-reflective paints);
- c. construct the project site in compliance with the approved plans;
- d. provide photo evidence to the Planning Division that the equipment is installed in compliance with the approved plans; and,
- e. maintain the site in compliance with the approved plans.

Documentation: The Permittee shall provide plans with equipment specifications and exterior colors to the Planning Division for review and approval. 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, the Permittee shall obtain approval of the submitted plans. Prior to final inspection, the Permittee shall paint and treat the approved structures according to the approved plans. Prior to final inspection of the oil and gas facility, the Permittee shall provide photos demonstrating that the facility was treated as approved.

Monitoring and Reporting: The Planning Division maintains a copy of the approved plans in the project file. 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*.

27. Site Restoration

Purpose: In order to comply with § 8107-5.5.5(e), 8107-5.5.6, & 8107-5.6.11 of the *Ventura County Non-Coastal Zoning Ordinance*.

Requirement: The Permittee shall restore disturbed areas in the project area to its original grade and condition, unless otherwise requested by landowner in writing and approved by the Planning Director.

Documentation: The Permittee shall submit a grading plan prepared by civil engineer to restore the site to the original contours. The Permittee shall also submit a restoration plan prepared by a County-approved, qualified biologist to be reviewed and approved by the Planning Division.

Timing: The Permittee shall submit the grading and restoration plans to the Planning Division and Public Works Agency 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 Permittee shall submit the grading plan to the Public Works Agency and the Planning Division prior to the commencement of the restoration

work. The Planning Division will not exonerate the financial securities required by Condition No. 19 until it has determined that the grading and restoration plans have been implemented as approved.

28. 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 additionally insured. This requirement does not preclude the Permittee from being self-insured.

Documentation: The Permittee shall submit a copy of the liability insurance policy documents.

Timing: Prior to the issuance of a Zoning Clearance, the Permittee shall provide the liability insurance Planning Division for review and approval. Prior to the issuance of a Zoning Clearance, the Permittee shall submit a copy of the approved liability insurance to the Planning Division for the project file. The Permittee shall maintain liability insurance for the subject property for the life of the permit.

Monitoring and Reporting: The Permittee shall submit the liability insurance to Planning Division for review and approval to ensure that the Oil and Gas Operation has the required coverage in a manner that is required. The Planning Division maintains a copy of the liability insurance in the project file. The Planning Director may ask for a current insurance policy at any time to confirm ongoing compliance with this condition.

29. Noise Standard for Oil and Gas Operations

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

Requirement: The Permittee shall ensure that drilling, production, and maintenance operations associated with this permit do not exceed the following noise levels, as measured over a one-hour period at locations that are occupied by noise-sensitive receptors (e.g., residences, schools, health care facilities, or places of public assembly):

One Hour Average Noise Levels (LEQ)		
<u>Time Period</u>	<u>Drilling and Maintenance Phase</u>	<u>Producing Phase</u>
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."

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.

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:

- a. hammering on pipe;
- b. racking or making-up of pipe;
- c. acceleration and deceleration of engines or motors;
- d. drilling assembly rotational speeds that cause more noise than necessary and could reasonably be reduced by use of a slower rotational speed; and,
- e. 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, shall be suspended until the problem is corrected.

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: 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.

30. Preventive Noise Insulation

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

Requirement: The Permittee shall provide sufficient soundproofing to ensure that noise levels do not exceed County adopted noise limits. Such soundproofing shall include any or all of the following: acoustical blanket coverings, sound walls, or other soundproofing materials or methods which ensure that operations meet the applicable noise standard.

Documentation: The Permittee shall submit photo-documentation, or some other evidence acceptable to the Planning Director, that the soundproofing is installed.

Timing: The Permittee shall install soundproofing prior to the commencement of drilling or maintenance activities, and shall maintain the soundproofing until the operations are complete. The Permittee shall provide photo evidence that the sound proofing is in place prior to the issuance of a Zoning Clearance.

Monitoring and Reporting: The Planning Division shall maintain in the project file the photo evidence that the soundproofing was installed. 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*.

31. 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 within 800 feet of 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 and affected parties within the prescribed distance have signed a waiver pursuant to § 8107-5.6.25.

Documentation: If the permitted uses involve nighttime drilling, the Permittee shall submit: the required waivers; or, in lieu of the waivers, a noise study from a qualified acoustical consultant for review and approval by the Planning Division.

Timing: The Permittee shall implement limited drilling hours until the drilling phase is complete. If the permitted uses involve nighttime drilling, the Permittee shall submit the waivers prior to the issuance of a Zoning Clearance. If the Permittee retains an acoustical consultant to prepare a noise study, the Permittee shall submit the noise

study prior to the issuance of a Zoning Clearance. If the noise study reveals the need for the implementation of noise attenuation measures to reduce sound levels to acceptable levels, the Permittee shall implement the noise attenuation measures prior to conducting the noise generating activities.

Monitoring and Reporting: The Planning Division maintains any submitted waivers in the project file. If a noise study is prepared, the Planning Division will review the study and ensure that any required soundproofing is installed prior to the commencement of noise generating activities. 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*.

32. 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:

- a. the Division of Oil and Gas well name and number;
- b. the name of the owner/operator of the oil facility;
- c. the name of the lease and name and/or number of the well; and,
- d. 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. The Permittee shall submit to the Planning Division for review and approval, a sign plan for well identification, which includes the sign size, text, and site location.

Documentation: The Permittee shall submit an approved sign plan.

Timing: The Permittee shall submit the sign plan prior to the issuance of a Zoning Clearance. The Permittee shall install the approved signs prior to the commencement of drilling.

Monitoring and Reporting: The Planning Division maintains the approved sign plan 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*.

33. 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/or 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. The fences must meet all Division of Oil and Gas regulations.

Documentation: The Permittee shall prepare an approved site plan and/or landscape plan illustrating the fences.

Timing: Prior to the issuance of a Zoning Clearance, the Permittee shall submit a site plan which identifies the location of the fences to the Planning Division for review and approval. These plans must include schematic details of the fences illustration height and construction materials. The Permittee shall install the fences prior to activating the wells.

Monitoring and Reporting: The Planning Division maintains the approved site plan and fencing plans 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. California Condor Protection BMPs

Purpose: To avoid significant impacts during drilling and ongoing operation of approved wells and facilities and ensure compatibility with conservation efforts outlined in the Recovery Plan for California Condor (April 19, 1996) and direction provided by United States Fish and Wildlife Service (USFWS) for oil and gas facilities within the range of the California Condor in Ventura County (USFWS, 2013).

Requirement: During construction and operation, the Permittee shall adhere to the following USFWS recommended California condor Best Management Practices (BMPs):

Transmission and Landing Deterrents

- a. All power lines, poles, and guy wires shall be retrofitted with raptor guards, flight diverters, and other anti-perching or anti-collision devices to minimize the potential for collision or electrocution of condors. Landing deterrents (e.g. Daddi Long Legs or porcupine wire) shall be attached to the walking beams on pumping units. New power and distribution lines shall be installed underground if determined to be necessary to avoid impacts to the California condor by the Planning Director in consultation with USFWS.

- b. All surface structures which are identified by the USFWS or County-approved qualified biologists as a risk to California condors, shall be modified (e.g. to include installation of raptor guards, anti-perching devices, landing deterrents) or relocated to reduce or eliminate the risk.

Microtrash

- c. All construction debris, food items, road kill, cigarette butts, and other trash including micro-trash (including but not limited to small items as screws, nuts, washers, nails, coins, rags, small electrical components, small pieces of plastic, glass, or wire, and anything that is colorful or shiny) will be covered or otherwise removed from a project site (including the access road) at the end of each day or prior to periods when workers are not present at the site.
- d. All hoses or cords that must be placed on the ground due to drilling operations that are outside of the primary work area (immediate vicinity of the drilling rig) will be covered to prevent California condor access. Covering will take the form of burying or covering with heavy mats, planks, or grating that will preclude access by California condors.
- e. All equipment and work-related materials (including, but not limited to, loose wires, open containers, rags, hoses, or other supplies or materials) shall be contained in closed containers either in the work area or placed inside vehicles.
- f. Poly chemical lines shall be replaced with stainless steel lines to preclude condors from obtaining and ingesting pieces of poly line.
- g. Prior to issuance of a Zoning Clearance for drilling or re-working of wells, informational signs describing the threat that micro-trash poses to condors, and the cleanup or avoidance measures being implemented, shall be posted at the site.
- h. Prior to conducting work on-site, employees and contractors shall be made aware of the California condor, and how to avoid impacts on them. Special emphasis shall be placed on keeping the well pad site free of micro-trash and other hazards.
- i. Wells pads shall be inspected closely for micro-trash on a daily basis.

Chemicals

- j. Ethylene glycol based anti-freeze or other ethylene glycol based liquid substances shall be avoided, and propylene glycol based antifreeze will be encouraged. Equipment or vehicles that use ethylene glycol based anti-freeze or other ethylene glycol based liquid substances shall be inspected daily for leaks, including (but not limited to) areas below vehicles for leaks and puddles. Standing fluid (e.g. a puddle of anti-freeze) will be remediated (e.g. cleaned up, absorbed, or covered) immediately upon discovery. Leaks shall be repaired immediately. The changing of antifreeze of any type shall be prohibited onsite.
- k. Open drilling mud, water, oil, or other liquid storage or retention structures shall be prohibited. All such structures must have netting or other covering that precludes entry or other use by condors or other listed avian species
- l. The design and location of any flaring equipment shall be subject to review and approval by the Planning Director in consultation with the USFWS.

Miscellaneous

- m. All food items and associated refuse shall be placed in covered containers that preclude access or use by California condors.
- n. All equipment and work-related materials (including loose wires, open containers, rags, hoses, or other supplies) will be placed in closed containers or inside vehicles.
- o. No dogs or other potentially predatory domesticated animals shall be allowed on the drill site unless on a leash or otherwise contained at all times.
- p. All construction equipment, staging areas, materials, and personnel shall remain within the perimeter of the disturbed area authorized under the applicable permit.
- q. The discharge of firearms at the project site or vicinity by any employee or contractor of the Permittee shall be prohibited.
- r. Feeding of wildlife by any employee or contractor working for the Permittee shall be prohibited.
- s. Access to the project site shall be made available to the representatives of the State and Federal wildlife agencies including California Department of Fish and Wildlife (CDFW) and USFWS upon request. Should a California condor be observed on-site by personnel of the Permittee, the USFWS, CDFW and the Planning Division shall be contacted immediately.
- t. Any road kill found on the access road shall be immediately cleared from the roadway and disposed.

The Permittee shall implement the BMPs listed above throughout the entire life of the project, unless modified by the County Planning Director in consultation with USFWS and CDFW. A County-approved qualified biologist shall confirm and photo-document the installation of the BMPs.

Documentation: The application shall prepare photo documentation of the complete installation of the signage and above BMPs.

Timing: Prior to the issuance of a Zoning Clearance for Construction (i.e. grading or land clearing activities), the Permittee must take the following actions:

- Install signage.
- Submit photo-documentation of the installation of the signage to the Planning Division.

Prior issuance of a Zoning Clearance for Use Inauguration (i.e. the Zoning Clearance for the drilling of first well), the Permittee must provide the Planning Division with photo documentation of the implementation of the above requirements.

Monitoring and Reporting: Planning Division staff will review the submitted reports. The Planning Division has the authority to conduct site inspections to ensure ongoing

compliance with this condition consistent with the requirements of § 8114-3 of the Ventura County Non-Coastal Zoning Ordinance.

35. Nesting Bird Pre-Construction Surveys:

Purpose: In order to prevent impacts to birds protected under the Migratory Bird Treaty Act, the drilling or re-working of wells shall be regulated.

Requirement: The Permittee shall conduct all drilling and re-working activities in such a way as to avoid impacts to nesting native birds. This can be accomplished by implementing one of the following options:

1. Timing of drilling and re-working of wells: Prohibit drilling and re-working activities during the breeding and nesting season January 1—September 15, in which case the following surveys are not required; or
2. Surveys and noise mitigation for occupied nests: Conduct site-specific surveys prior to drilling and well re-working activities during the breeding and nesting season (January 1 – September 15) and avoid impacting occupied bird nests. Surveys shall be conducted to identify any occupied (active) bird nests in the area of disturbance. Impacts to occupied nests shall be avoided until juvenile birds have vacated the nest. All surveys shall be conducted by a County-approved biologist.

An initial breeding and nesting bird survey shall be conducted 30 days prior to the initiation of drilling or re-working activities. The project site must continue to be surveyed on a weekly basis with the last survey completed no more than 3 days prior to the initiation of drilling or re-working activities. The nesting bird survey area (noise mitigation area) will include all areas with an Leq at or greater to 50dB(A) or an Leq 10dB(A) greater than ambient levels, whichever is less during drilling or re-working activities. Leq is defined as the average sound levels recorded during the measurement period. If ground nesting species have the potential to occur in the area, ground surveys shall also be conducted. The survey area shall also be defined as any area with a peak sound level (Lmax) greater than 60 dB(A). If occupied (active) nests are found, noise from drilling or re-working activities shall be mitigated through noise mitigating measures (e.g. noise barriers, acoustic enclosures, etc.) so that noise level within the noise mitigation area drop below the levels specified above. Monitoring shall be conducted at the noise mitigation area boundary at a frequency to be determined by the Planning Division. Evidence that noise has been mitigated to the Leq and Lmax specified shall be demonstrated to the Planning Division prior to commencement of drilling or re-working activities. The noise mitigation area can be increased or decreased based on the recommendation of the County-approved biologist and approval from the Planning Division.

Documentation: The Permittee shall provide to the Planning Division a Survey Report from a County-approved biologist documenting ambient sound levels, the sound levels generated by the equipment to be used during drilling or re-working activities, and the distance from the noise source to the perimeter of the survey area that determines the

survey and noise mitigation area for nesting birds. The Permittee shall also provide results of the initial nesting bird survey. If nesting birds are found, a Noise Mitigation Plan shall be submitted that includes noise mitigation measures and a range of reduction (in dB(A)) each mitigation measure can achieve. Along with the Survey Report and Noise Mitigation Plan (as necessary), the Permittee shall provide a copy of a signed contract (financial information redacted) with a County-approved biologist responsible for the surveys, monitoring of any occupied nests discovered, and establishment of noise mitigation measures. If nesting birds are found to occur, the Permittee shall submit to the Planning Division a Mitigation Monitoring Report from a County-approved biologist following drilling and re-working activities documenting noise level monitoring and any adjustments made to mitigation measures to ensure compliance with Leq and Lmax levels.

Timing: If drilling or re-working activities will occur between January 1 and September 15, nesting bird surveys shall be conducted 30 days prior to initiation of drilling or re-working activities, and weekly thereafter, and the last survey for nesting birds shall be conducted no more than 3 days prior to initiation of during drilling or re-working activities. The Survey Report documenting the results of the first nesting bird survey, Noise Mitigation Plan (as necessary), and signed contract shall be provided to the Planning Division prior to issuance of a zoning clearance for drilling and re-working activities. The Mitigation Monitoring Report shall be submitted within 14 days of completion of drilling and re-working activities.

Monitoring and Reporting: The Planning Division shall review the Survey Report, Noise Mitigation Plan (as necessary), and signed contract for adequacy prior to issuance of a Zoning Clearance for drilling and re-working activities. The Planning Division shall maintain copies of the signed contract, Survey Report, Noise Mitigation Plan, and Mitigation Monitoring Report in the project file.

Residual Impact(s)

With the implementation of the mitigation measures listed above, residual project-specific impacts will be less than significant and the proposed project will not make a cumulatively considerable contribution to significant cumulative impacts related to special status species.

36. Sensitive Species Surveys related to Noise Impacts

Purpose: To avoid impacts to special-status wildlife during drilling and re-working activities associated with oil exploration.

Requirement:

The Permittee shall retain a qualified County- approved biologist familiar with sensitive species with potential to occur on the project site. The surveys should encompass the entire noise mitigation area as determined during Nesting Bird Pre-Construction Surveys. The survey methods should follow the latest guidance from USFWS and CDFW regarding survey protocols for listed and rare wildlife species. The Permittee

shall notify USFWS for species listed under the Federal ESA and CDFW for species listed under CESA within 24 hours of locating any individuals of listed species. In the event of positive survey results, the Permittee shall a.) Consult with the USFWS for species listed under the Federal ESA and with CDFW for species listed under the State ESA in order to obtain an incidental take permit or b.) Mitigate noise and vibration levels below threshold levels specific to the species present.

The County-approved Biologist shall conduct surveys for special-status wildlife, including but not limited to foothill yellow legged frog, southern California steelhead trout, western pond turtle, arroyo chub, and Santa Ana sucker. Survey area should include the same area used for nesting bird surveys and shall also include drainages or wetlands within 300 feet of the well.

If sensitive wildlife species are found and noise mitigation measures are put in place, the Biologist shall:

- Monitor the site for a two-hour minimum duration on day one of drilling or re-working activities.
- Return to the site at least once weekly for at least a two-hour duration to monitor throughout drilling and re-working activities.

Documentation: The Permittee shall submit the following documents to the Planning Division for review and approval:

- A copy of a signed contract (financial information redacted) with a County-approved biologist responsible for the surveys and monitoring of wildlife. When the monitoring will occur and what areas will be monitored must be clearly stipulated in the contract. *(It is recommended that the Permittee shall submit a draft copy of the proposed contract to the Planning Division for review and comment prior to the contract being executed.)*
- An Initial Survey Report from a County-approved biologist documenting the results of the initial special-status wildlife survey and a plan for continued surveys as necessary in accordance with the requirements above.
- Mitigation Monitoring Report documenting the results of the monitoring and actions taken to prevent loss of special-status wildlife and results.

Timing: Prior to issuance of a Zoning Clearance for drilling or re-working activities, the Permittee shall have taken the following actions:

- Provide the Planning Division with a copy of a signed contract as specified above.
- Provide the Planning Division with a copy of the Initial Survey Report. The first survey shall be conducted 30 days prior to initiation of construction. *(Surveys*

must continue on a weekly basis with the last survey being conducted no more than 3 days prior to the initiation of land clearing activities.)

Within 30 days of the completion of construction, the Permittee shall submit to the Planning Division, a Mitigation Monitoring Report from a County-approved biologist documenting actions taken to prevent loss of special-status wildlife and results.

Monitoring and Reporting: The Planning Division maintains copies of the signed contract and the Mitigation Monitoring Report provided by the Permittee in the project file. The Planning Division has the authority to inspect the property during the monitoring phase of the project to ensure that the County-approved qualified biologist is on-site as required. The County-approved qualified biologist has the authority to temporarily "stop work" if noise levels exceed the Lmax in the noise mitigation area.

37. Notice of Commencement of Site Preparation or Drilling

That 10 days prior to commencement of site preparation or drilling, the Permittee shall notify in writing Thomas Aquinas College and the Ferndale Ranch (or their successors in interest) that such activities are about to occur. Additionally, the Permittee shall notify Thomas Aquinas College and the Ferndale Ranch in writing prior to conducting major maintenance activities, including, but not limited to, reworking and redrilling.

38. Light Emanation

That pursuant to Section 8107-5.6.7, light emanation shall be controlled so as not to produce excessive levels of glare or abnormal light levels directed at any neighboring uses. Lighting shall be kept to a minimum to maintain the normal night-time light levels in the area. Prior to drilling any drilling activities, the Permittee shall submit to the Planning Division a plan for shielding of light fixtures to minimize night-time lighting impacts on Thomas Aquinas College (or their successors in interest). Prior to approval of said plan, the Planning Division shall provide a reasonable notice and opportunity for Thomas Aquinas College (or their successors in interest) to submit comments.

39. Oil Pipeline

All produced oil shall be transported off-site by means of an oil pipeline. In the event of a pipeline failure, the Permittee shall immediately notify the County, the Ferndale Ranch, and Thomas Aquinas College (or their successors in interest). Following such notification, the Permittee may transport oil by means of tanker trucks on the designated oil traffic access road for a period not to exceed 30 days. If the pipeline has not been restored to service within said 30 day period, all trucking of oil shall cease until repairs have been completed unless authorized by the Planning Director pursuant to Condition 3.

40. On-Site Quarters

That no one shall reside on the area under permit except those individuals who are required to be on the site 24 hours per day. These individuals include, but are not limited to, the foreman, drilling mud specialist, mud logger, and directional drilling technicians.

41. Exceptions to Noise Standard

Pursuant to Section 8107-5.6.13, the noise standard established for this permit shall not be exceeded unless exempted 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 Section 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.

42. Drill Site No. 2 Noise Barrier

Prior to commencement of drilling on Drill Site No. 2, a minimum four-foot high earthen berm shall be installed and/or maintained along the western and southern boundaries of the drill site to minimize noise impacts at Thomas Aquinas College (or their successors in interest).

43. Traffic Noise Barrier

The Permittee shall construct and maintain noise attenuation structures, such as a wall or berm, along that portion of the access road which passes through the future College faculty residential area. Construction on the noise attenuation structure shall be completed within 30 days of the occupancy of completed permanent faculty housing.

44. Hiking Trail

The Permittee shall cooperate with Thomas Aquinas College, the Ferndale Ranch (or their successors in interest) and the US Forest Service to establish a permanent hiking trail in the Santa Paula Canyon. In the meantime, the Permittee shall reconstruct and maintain a temporary hiking trail in the vicinity of Drill Site Nos. 1 and 7. In no case shall the oil operations obstruct the hiker's access to Santa Paula Canyon.

45. Oil Traffic on College/Ranch Road

The College/Ranch Road may be used during emergency situations, where all other access routes are impassable due to natural occurrences. The Permittee shall make the necessary repairs as soon as it is practical to do so. The designated oil traffic access route shall be restored to usable condition within 30 days. Failure to restore the road within the time specified shall be considered cause to suspend operations. For purposes of meeting the requirements of this condition, Emergency shall be used as defined in the California Environmental Quality Act (CEQA).

Emergency- a sudden, unexpected occurrence, involving a clear and imminent danger, demanding immediate action to prevent or mitigate loss of, or damage to life, health, property, or essential public services. Emergency includes such occurrences as fire, flood, earthquake, or other soil or geologic movements, as well as such occurrences as riot, accident, or sabotage (CEQA 15359).

46. Drill Site No. 1 to Drill Site No. 2 Access Road Realignment

The access road between Drill Site No. 1 and Drill Site No. 2 shall be realigned to reduce grades and runaway vehicle escape ramps shall be provided to reduce runaway vehicle hazards. Particular attention shall be paid to surface water run-off.

47. Surfacing of Oil Access Road

That the access road from the Highway 150 entrance to each drill site shall be paved and maintained in good condition at all times.

48. Drill Site Berms and Dikes

Each drill site shall be designed to contain any accidental leakage on the site. This may be accomplished by constructing a minimum 12 inch earthen berm around the site (including vehicle access points) or by grading the site in such a way that all drainage flows toward the well cellars, a catch basin, or safety sump. The spill containment system shall be maintained in good condition at all times.

That the earthen dike around the production tanks on Drill Site No. 1 shall be compacted and maintained at a height that shall hold all the liquid volume that could be maintained in the subject tanks.

A barrier shall be constructed on the east side of Drill Site No. 7 a distance of at least 15 feet from the base of the slope. Such barrier shall be constructed to protect Drill Site No. 7 from potential hazard of falling rock.

49. Paving of Drill Sites

That prior to commencement of drilling operations, Drill Site Nos. 1 and 7 shall be paved or otherwise made impermeable to minimize the potential for ground water pollution.

50. Natural Gas Pipeline

All gas emitted from the wells shall be collected and transported off-site by means of a pipeline.

51. Gas Flaring and Venting Prohibited

Flaring or venting of gas shall be prohibited, except that temporary flaring may be permitted in case of emergency or for testing purposes only.

52. Drilling Prohibition

Drilling shall not be conducted during the months of July and May each year unless authorized in writing by Thomas Aquinas College.

II. Environmental Health Division (EHD) Conditions

53. Hazardous Materials Management

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

OTHER VENTURA COUNTY AGENCIES

III. Ventura County Public Works Agency (PWA) Conditions

54. Containment Area for Liquid Waste and Petroleum Products

Purpose: In accordance with the Ventura County General Plan Policies 1.3.2.2 & 4a, Containment Area for Liquid Waste and Petroleum Products is required.

Requirement: All liquid waste and petroleum products shall be stored in proper containers and stored in pre-approved or designated containment areas only. If waste products will be stored in an alternate temporary location, Permittee shall provide detailed plans of impermeable area with same construction as containment areas. Specifically describe where these waste products will be stored, an estimate of the amount of accumulated waste at any one time and information on the planned frequency for disposal.

Documentation: A copy of the approved Containment Area for Liquid Waste and Petroleum Products site plan.

Timing: Prior to the issuance of a Zoning Clearance for use inauguration, the Permittee shall submit a Containment Area for Liquid Waste and Petroleum Products site plan to the WPD for review and approval.

Monitoring and Reporting: A copy of the approved Containment Area for Liquid Waste and Petroleum Products site plan will be maintained in the case file. The Permittee shall allow the WPD to inspect the Containment Area for Liquid Waste and Petroleum Products upon request.

55. Containment Area for Hazardous Materials

Purpose: In accordance with the Ventura County General Plan Policies 1.3.2.2 & 4a, Containment Area for Hazardous Materials is required.

Requirement: The Permittee shall submit a site plan to the WPD that shows all hazardous materials, fertilizers and chemicals are stored in a Containment Area properly designated and equipped for the safe storage of the hazardous materials, fertilizers and chemicals.

Documentation: A copy of the approved Containment Area for Hazardous Materials site plan.

Timing: Prior to the issuance of a Zoning Clearance for use inauguration, the Permittee shall submit the Containment Area for Hazardous Materials site plan to the WPD for review and approval.

Monitoring and Reporting: A copy of the approved Containment Area for Hazardous Materials site plan will be maintained in the case file. The Permittee shall allow WPD to inspect the Containment Area for Hazardous Materials upon request.

56. 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. In addition, Part 4.F requires additional inspections to be conducted by the Qualified Stormwater Pollution Prevention Plan (SWPPP) Developer, Qualified SWPPP Practitioner, or Certified Professionals in Erosion and Sediment Control (CPESC).

Documentation: The Permittee shall prepare and submit the following items to the Watershed Protection District, Surface Water Quality Section (SWQS) for review upon request:

- Complete SW-HR form (Best Management Practices for Construction at High Risk Sites), 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 Construction.

Monitoring and Reporting: SWQS will review the submitted materials for consistency with the NPDES Municipal Stormwater Permit. Grading Permit Inspectors will conduct inspections during construction to ensure effective installation of the required BMPs. In addition, the inspector will review record keeping of conducting required inspections by the project proponents Qualified SWPPP Developer, Qualified SWPPP Practitioner, or CPESC).

57. State General Industrial Stormwater Permit No. CAS000001 Requirements

Purpose: To ensure the project maintains compliance with all water quality provisions in accordance with NPDES General Permit (No. CAS000001), Waste Discharge Requirements for Discharges of Stormwater Runoff Associates with Industrial Activities.

Requirement: Proper filing of all compliance documents required under the NPDES General Industrial Stormwater Permit (No. CAS000001).

Documentation: The Permittee shall submit the following items to the Watershed Protection District - Surface Water Quality Section (SWQS) staff for review:

- a. Current Notice of Intent (NOI) in accordance with the State Water Resources Control Board requirements under the NPDES General Industrial Stormwater Permit (No. CAS000001); or verification of payment for current coverage year, whichever one is more recent;
- b. Copy of the project Stormwater Pollution Prevention Plan (SWPPP); and
- c. Copy of the most recent Annual Report if applicable.

Timing: The above listed items shall be submitted to the SWQS for review prior to issuance of Zoning Clearance for Use Inauguration.

Monitoring and Reporting: SWQS staff will review the submitted materials for consistency with the General Industrial Stormwater Permit. Current and site-specific SWPPP shall be kept on-site for periodic review by the SWQS inspectors. (SWQ-2)

58. Floodplain Clearance

Purpose: To comply with the Ventura County Floodplain Management Ordinance and Ventura County General Plan policies 2.10.2-2 and 2.10.2-3.

Requirement: The Permittee shall obtain a Floodplain Clearance from the County Public Works Agency Floodplain Manager. The Clearance will verify that the site is located outside the mapped boundaries of the 1% annual chance floodplain as determined using the latest available Digital Flood Insurance Rate Map (DFIRM) provided by the Federal Emergency Management Agency (FEMA).

Documentation: A Floodplain Clearance issued by the County Public Works Agency Floodplain Manager.

Timing: The Floodplain Clearance shall be obtained prior to Zoning Clearance for Use Inauguration.

Monitoring and Reporting: A copy of the approved Floodplain Clearance shall be provided to the Building and Safety Department as well as maintained in the case file by the Public Works Agency.

IV. Ventura County Fire Protection District (VCFPD) Conditions

59. Address Numbers

Purpose: To ensure proper premise identification to expedite emergency response.

Requirement: The Permittee shall install a minimum of 10 inch (10") address numbers that are a contrasting color to the background and readily visible at night at the entrance to the oil field from Ojai-Santa Paula Road. Additional address directional signs may be required at common road access points.

Documentation: A stamped copy of an approved addressing approval from Building and Safety or a signed copy of the Ventura County Fire Protection District's Fire Code Permits.

Timing: The Permittee shall install address numbers before any drilling operations.

Monitoring and Reporting: A copy of the approved addressing plan and/or signed copy of the Ventura County Fire Protection District's Fire code permit shall be kept on file with the Fire Prevention Bureau. The Fire Prevention Bureau shall conduct a final inspection to ensure that all structures are addressed according to the approved plans/form.

60. Well Site Signage

Purpose: To ensure proper identification of each Oil Well Site to expedite emergency response.

Requirement: The Permittee shall install and maintain oil well site signage indentifying each well site and provide directional signs along access roads. submit a site map to the Fire Prevention Bureau indicating the locations of each well site.

Documentation: A copy of the approved site map.

Timing: The Permittee shall submit site map to the Fire Prevention Bureau for the addition of each new oil well.

Monitoring and Reporting: A copy of the site map shall be kept on file with the Fire Prevention Bureau. The Fire Prevention Bureau shall conduct a final inspection to ensure that all structures are addressed according to the approved plans.

61. Access Road 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) 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). The minimum width of access road shall be no less than 20 feet.

Documentation: A copy of the Covenants, Conditions and Restrictions or such other documentation as may be deemed acceptable by the Fire Prevention Bureau.

Timing: The Permittee shall provide evidence of provisions for maintenance must be submitted to the Fire Prevention Bureau prior to [occupancy].

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.

62. Vertical Clearance

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 vertical clearance of 13 feet 6 inches (13'-6") along all access roads/driveways.

Documentation: A stamped copy of the approved access plan.

Timing: The Permittee shall submit an access plan to the Fire Prevention Bureau for approval before the issuance of building permits. All required access shall be installed before the start of combustible construction.

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.

63. 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: A stamped copy of the approved access plan.

Timing: The Permittee shall submit an access plan to the Fire Prevention Bureau for approval before the issuance of building permits. All required access shall be installed before the start of combustible construction.

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.

64. 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 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: A stamped copy of the approved access plan.

Timing: The Permittee shall maintain a copy of approved access plans and provide a copy to the Fire Prevention Bureau. The plans shall indicate all access road locations and proposed turnaround locations and design.

Monitoring and Reporting: A copy of the approved access plans 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.

65. 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 maintain all gates along required fire access roads consistent with Fire Protection District Standards. A Knox lock shall be provided for each gate.

Documentation: A stamped copy of the approved gate plans.

Timing: The Permittee shall submit gate plans to the Fire Prevention Bureau for the installation or replacement of any access road gates.

Monitoring and Reporting: A copy of the approved gate 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.

66. 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 be provided no less than 20,000 gallons during the drilling of new wells and the redrilling of exiting wells sites. This requirement applies to each new drilling operation.

Documentation: A stamped copy of the approved private water system plans.

Timing: The Permittee shall submit private water system plans to the Fire Prevention Bureau for approval before the issuance of Fire Code Permits for Oil Well Drilling. The private water system shall be installed and operational before the start of drilling operations. Before burying, all underground piping (if applicable) shall be visually inspected by the Fire Prevention Bureau.

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.

67. Hazardous Fire Area

Purpose: To advise the applicant that the project is located within a Hazardous Fire Area and ensure compliance with California Building and Fire Codes.

Requirement: The Permittee shall construct all new structures to meet hazardous fire area building code requirements.

Documentation: A stamped copy of the approved building plans to be retained by the Building Department.

Timing: The Permittee shall submit building plans to the Building Department for approval before the issuance of building permits.

Monitoring and Reporting: The Fire Prevention Bureau shall conduct a final inspection to ensure that the structure is constructed according to the approved hazardous fire area building code requirements. Unless a modification is approved by the Fire Prevention Bureau, the Permittee, and his successors in interest, shall maintain the approved construction for the life of the structure.

68. Hazard Abatement

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

Requirement: The Permittee shall have all grass or brush adjacent to oil drilling sites and storage tanks cleared for a distance of 30 feet. All grass and brush shall be removed a distance of 10 feet on each side of all access road(s) and power poles within the project site.

Documentation: A signed copy of the Ventura County Fire Protection District's Fire Code Permits or the "Notice to Abate" issued under the Fire District's Fire Hazard Reduction Program.

Timing: 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 start of construction on any structure.

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

69. Fire Protection 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 and increase emergency response capability.

Requirement: The Permittee shall prepare a Fire Protection Plan (FPP). The FPP 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 FPP.

Documentation: A copy of the approved Fire Protection Plan (FPP).

Timing: The Permittee shall submit a copy of the Fire Protection Plan (FPP) to the Fire Prevention Bureau for approval before the issuance of a building permit.

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

70. 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.

71. 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 approved entitlement conditions.

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.

72. Oil Well Drilling

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

Requirement: The Permittee shall obtain a Fire Code permit for drilling.

Documentation: A signed copy of the Fire Code permit(s).

Timing: The Permittee shall submit a Fire Code permit application along with required documentation/plans to the Fire Prevention Bureau for approval at least two (2) weeks before drilling. The submittal 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. 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.

V. Air Pollution Control District (APCD) Conditions

73. Authority to Construct

An APCD Authority to Construct shall be obtained for all equipment subject to permit prior to construction or commencement of drilling operations.

74. APCD Rules

Facilities shall be constructed and operated in accordance with the Rules and Regulations of the Ventura County Air Pollution Control District.

Dobrowalski, Jay

From: Janna Minsk <JMinsk@spcity.org>
Sent: Monday, November 17, 2014 4:12 PM
To: Dobrowalski, Jay
Subject: Case No. PL 13-0150

Jay-

Thank you for the opportunity to review the above mentioned project. We have no comments at this time.

Regards

Janna Minsk, Planning Director
City of Santa Paula
805/933-4214 ext. 244

Email: jminsk@spcity.org