



NATIONAL ASSOCIATION OF ROYALTY OWNERS – CALIFORNIA, INC.
Serving the Citizens Who Own California's Oil and Gas Resources

Ventura County Board of Supervisor
Clerk of the Board
Via email: clerkoftheboard@ventura.org

November 9, 2020

Dear Supervisors:

My name is Edward Hazard. My family and I are California oil and gas mineral and royalty owners. I am president of the California chapter of the National Association of Royalty Owners. We advocate for and support the interests of the estimated 500,000 oil and gas royalty owners of California.

I am writing you in strong opposition to the proposed amendments to the Ventura County Non-Coastal Zoning Ordinance as well as the effort to invalidate “legacy” oil and gas Conditional Use Permits. These actions would, among others, add the following policies and restrictions:

- COS-7.2 – The County shall require new discretionary oil wells to be located a minimum of 1,500 feet from residential dwellings and 2,500 from any school.
- COS-7.4 – The County shall require discretionary development for oil and gas exploration and production to use electrically-powered equipment from 100 percent renewable sources and cogeneration, where feasible, to reduce air pollution and greenhouse gas emissions from internal combustion engines and equipment.
- COS-7.6 – The County shall evaluate discretionary development to identify any abandoned oil and gas wells on the project site.
- COS-7.7 – The County shall require new discretionary oil wells to use pipelines to convey oil and produced water; oil and produced water shall not be trucked.
- COS-7.8 – The County shall require that gases emitted from all new discretionary oil and gas wells shall be collected and used or removed for sale or proper disposal. Flaring or venting shall only be allowed in cases of emergency or for testing purposes.

Moreover, in addition, this coming Tuesday the Board of Supervisors will vote on a plan to invalidate “legacy” Conditional Use Permits so that new development in most of the county will require new discretionary permits. Those permits will only last 15 years.

These Oil and Gas Policies and the plan to invalidate so-called legacy permits would have the effect of eliminating oil and gas exploration and production in Ventura County. This is of great

Founded in 1980, the National Association of Royalty Owners is the only national organization representing solely, and without compromise, oil and gas royalty owners' interests.

concern to mineral owners who can only realize the royalty income from their properties if oil and gas production continues.

Mineral owners can't move their mineral rights, can't produce their oil somewhere else. The oil needs to be produced from where it was placed by nature. It is not like a hardware store that can move its business to another location. The oil can only be moved if it is produced. The mineral and royalty owners' assets will have no value if they are no longer able to produce oil from them. Their assets will have been taken from them by the County. They will be forced to take action to protect their assets.

If forced to take action, NARO-California will stand with the royalty owners, just as we did in Monterey County. When Monterey County passed the oil shutdown Measure Z, NARO-California filed suit together with over 80 royalty owners as named co-plaintiffs. In addition, five oil companies filed suit. Millions were spent on legal fees and costs. We won, the County lost. Legal action is a last resort. We do not take it lightly. It is something I hope we never have to do again. Please, do not pursue the proposed Oil and Gas Policies and the plan to invalidate legacy permits.

Sincerely,

A handwritten signature in blue ink, appearing to read "Edward S. Hazard", with a stylized flourish at the end.

Edward S. Hazard, President

Cc: Edward S. Renwick, Esq., NARO-CA Vice President and General Counsel