

**Key, Lori**

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**From:** Phil Chandler <[REDACTED]>  
**Sent:** Monday, November 9, 2020 2:33 PM  
**To:** ClerkoftheBoard  
**Subject:** Oil and Gas Permits

Modern safety and environmental standards must be applied by the County of Ventura to all oil and gas operations in Ventura County. The current Conditional Use Permits do not provide adequate Assurance of Financial Responsibility (AFR) These permits were handed out decades ago, before our current understanding of the public health, safety, and climate impacts of oil production. Too many spills and other damaging aspects of these operations fall to the public to clean up. State laws governing hazardous waste---see applicable sections in California Code of Regulations, Title 22 which can provide a parallel construct to be used as a model. I am not saying the oil and gas operations are managing hazardous ---although frequently do----I am saying that a cost estimate for any potential environmental costs needs to be developed by the permit applicant, to be reviewed and approved by the County, and the AFR needs to be in place before any new or renewing permits are actually issued Title 22 specifies a number of acceptable financial mechanisms. These mechanisms are an easy cut and paste into County requirements. No person or corporation should be allowed an unlimited right to expand in risky ways that threaten to pollute our land, air, or water----without assuring that they themselves can pay to fix it if they break it. Stop allowing them to make a mess and then having to sue them to cleanup. Environmental costs of their operations should not be borne by the public.

All new drilling and expanded extraction should require a new permit, full compliance with current health, safety and environmental standards and the addition of AFR to show the oil and gas permittees have environmental "skin in the game".

Sincerely,

Phil Chandler  
[REDACTED]

Oxnard, CA 93035