

Sussman, Shelley

From: Fogg, Mindy
Sent: Monday, July 11, 2022 8:03 AM
To: Sussman, Shelley
Cc: Curtis, Susan; Ward, Dave
Subject: FW: One well abandon for one drill LA County.pdf
Attachments: One well abandon for one drill LA County.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

FYI-

From: Carol Holly <carol.holly2@gmail.com>
Sent: Sunday, July 10, 2022 4:04 PM
To: Fogg, Mindy <Mindy.Fogg@ventura.org>
Subject: One well abandon for one drill LA County.pdf

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July 10, 2022

Re: PL21-0099 – PL21-0100

Hi Mindy,

(I sent this email to both you and Shelly Sussman but her email blocked the receipt of the message. I was not sure if your email blocked it also, so I am resending. Can you please forward this to Shelly also?)

Thank you for releasing the main elements of the proposed amendment to the oil and gas ordinance and the questions and answers for same. I am writing this to you because I question the answer given by staff to questions #3 and #7 as they apply to jurisdiction over long term idle wells. The answer broadly states that idle wells are under the sole purview and jurisdiction of CalGem and thus the County is responsible for only that which is above ground.

Los Angeles County addressed the long-term idle well problem in 2014 with a simple solution during a permit renewal. Attached you will find a permit renewal that was issued in 2014 by Los Angeles County in which the County required that one idle well be abandoned prior to the drilling of one new well. Note condition (n) of said permit. As you can see, new wells are referred to as replacement wells because the permit has a hard cap of 34 wells (the number of existing wells including idle wells). There is also a total limit of the number of new wells that may be drilled (4) regardless of their status as replacement wells.

This simple strategy of limiting the total number of wells including active and idle wells to a certain number – in this case the existing number of idle and active wells on the permit – requires the operator to abandon an idle well for each well that he/she wants to drill. A former CalGem supervisor, Anneliese Anderle, told me that in that capacity she personally oversaw the abandonment of a well on this permit so that the operator could drill a new one.

County of Ventura Planning Commission Hearing PL21-0099 and PL21-0100 Exhibit 9 - Written comments submitted as of July 20, 2022, at 12:00 p.m.
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As I am not an attorney, I don't know if this simple approach could be construed to apply to re-drills as well as new wells. I'm sure County Counsel could advise the planning department as to that possibility.

The County certainly has the power to limit the size of a conditional use permit. It also has the power to limit the use on that conditional use permit. This simple "one for one" approach to renewal permits guarantees that the permitted number of wells will not increase unless the number of idle wells decreases. Since the County today is home to more idle than active wells by a significant margin, this approach, while not going far enough toward solving the idle well problem, is at least something the planning department could implement, likely without putting a new ordinance in place.

Respectively Submitted,

Carol Holly

Sussman, Shelley

From: keith@castle-light.com
Sent: Tuesday, July 12, 2022 2:26 PM
To: Shelley.Sussman@ventura.org.
Cc: Citizens Journal
Subject: FW: VENTURA COUNTY PLANNING DIVISION - PROPOSED OIL AND GAS ORDINANCE AMENDMENTS AVAILABLE FOR REVIEW

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Hi Shelley:

What's going on??

**I thought this program had been voted on
..... and turned down??**

Subject: VENTURA COUNTY PLANNING DIVISION - PROPOSED OIL AND GAS ORDINANCE AMENDMENTS AVAILABLE FOR REVIEW

[View this email in your browser](#)



NOTICE OF PUBLIC HEARING FOR PL21-0099 and PL21-0100: VENTURA COUNTY-

**INITIATED ADOPTION OF AN ORDINANCE
AMENDING ARTICLE 7 OF THE VENTURA
COUNTY NON-COASTAL ZONING
ORDINANCE AND AN ORDINANCE
AMENDING ARTICLE 5 OF THE VENTURA
COUNTY COASTAL ZONING
ORDINANCE PERTAINING TO OIL AND GAS
OPERATIONS**

NOTICE IS HEREBY given that a public hearing, as provided by law, will be held by the **Planning Commission of Ventura County on Thursday, July 28, 2022, at 8:30 a.m.**, at 800 S. Victoria Avenue, Ventura CA 93009, County Government Center, Hall of Administration, Board of Supervisors Hearing Room, to consider the matter below.

In accordance with Government Code section 54953(e)(1)(A) the Planning Commission is allowing for both in-person participation and electronic participation through Zoom. To find out how you may electronically attend the Planning Commission hearing and provide public comment, please refer to the instructions on our website at <https://vcrma.org/en/public-comments-for-planning-commission-hearings>.

CASE NUMBERS: PL21-0099 and PL21-0100

APPLICANT: County of Ventura, Resource Management Agency, Planning Division

PROJECT LOCATION: Countywide

Sussman, Shelley

From: Todd Collart <collart@west.net>
Sent: Monday, July 18, 2022 4:16 PM
To: Richard Baldwin; Phil White
Cc: Sussman, Shelley
Subject: Fwd: Anthony Ingraffea on well integrity

Follow Up Flag: Follow up
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Hi,

I recalled this info from A&B days, but needed a more direct link to it for the recent CEC actions and pending Planning Dept. proposal to up bonding amounts for abandoning wells.

TODD

Begin forwarded message:

From: Merrill Berge <merrillberge@gmail.com>
Subject: Fwd: Anthony Ingraffea on well integrity
Date: July 18, 2022 at 11:30:09 AM PDT
To: Todd Collart <collart@west.net>

Here you go, Todd!
Good thinking,
M

----- Forwarded message -----

From: <rawitt@verizon.net>
Date: Sun, Sep 26, 2021 at 10:17 PM
Subject: Anthony Ingraffea on well integrity
To: merrillberge@gmail.com <merrillberge@gmail.com>
Cc: jdietrick9@gmail.com <jdietrick9@gmail.com>, faithagrnt@aol.com <faithagrnt@aol.com>

Hi Merrill,

In follow-up to our 350 Climate Hub/CFROG meeting today, below I've pasted the quote I mentioned as well as some additional information on Anthony Ingraffea for you.

Rose Ann

"As a longtime oil and gas engineer who helped develop shale fracking techniques for the Energy Department, I know these technological advancements have not equated to making oil and gas development a cleaner extractive industry. ... Multiple industry studies show that about 5 percent of all oil and gas wells leak immediately because of integrity issues, with increasing rates of leakage over time. ... According to a review of industry's own data, 60 percent of oil and gas wells failed within 28 years." (Casper Star-Tribune, 10/2013)

Ingraffea believes safe hydraulic fracturing is simply a myth, and advises, "Where shale gas development has not yet occurred, ban it. Period. Where it is occurring, enact ironclad regulations, inspect for compliance with them with dogged diligence, and enforce them relentlessly with fines that really mean something."

Gangplank to a Warm Future

<https://www.nytimes.com/2013/07/29/opinion/gangplank-to-a-warm-future.html>

INTERVIEW

Meet Anthony Ingraffea – From Industry Insider to Implacable Fracking Opponent

<https://truthout.org/articles/meet-anthony-ingraffea-from-industry-insider-to-implacable-fracking-opponent/>

Assessment and risk analysis of casing and cement impairment in oil and gas wells in Pennsylvania, 2000–2012

<https://www.pnas.org/content/111/30/10955>

Shale Gas: The Technological Gamble That Should Not Have Been Taken by Anthony Ingraffea

<https://www.youtube.com/watch?v=PGfljCG-zB4>

Sussman, Shelley

From: Marc Traut <marc@renpetllc.com>
Sent: Friday, July 15, 2022 6:47 AM
To: Sussman, Shelley
Cc: Fogg, Mindy; Marc Traut
Subject: Re: Ventura County Planning Division Proposes Oil and Gas Ordinance Amendments

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Ms. Sussman,

I have reviewed the draft document of the proposed amendments to the NCZO concerning oil and gas operations, specifically Sections 8107-5.6.5 (sureties) and 8107-5.6.12 (insurance). Sections 8107-5.6.5 and 8107-5.6.12.c address the implementation of the amended requirements for sureties and insurance, respectively. According to Sec. 8107-5.6.5.h all sureties required are to be provided to the Planning Division within 180 days after 60 days following the effective date of the amended ordinance and according to Sec. 8107-5.6.12.c certificates of insurance for the required amounts are to be provided to the Planning Division within 90 days following the effective date of the amended ordinance.

What is not clear to me is what will trigger the implementation of these two new requirements for existing permits. Will the new requirements discussed above be triggered by some future modification to an existing CUP?

Thanks in advance.

Marc Traut

Renaissance Petroleum, LLC

On Friday, July 8, 2022 at 11:20:46 AM PDT, Sussman, Shelley <shelley.sussman@ventura.org> wrote:

July 8, 2022

Dear Stakeholder,

The County of Ventura is providing information related to the following proposed project:

PROJECT DESCRIPTION: The proposed project consists of the County's adoption and implementation of Non-Coastal Zoning Ordinance (NCZO) and Coastal Zoning Ordinance (CZO) amendments related to establishing a 15-year term for new and extended conditional use permits for oil and gas operations, updated surety and insurance requirements for oil and gas operations, and a request for a professional study to identify idle wells in unincorporated Ventura County that should be prioritized for plugging and abandonment. To learn more about the project and review the proposed ordinance amendments, visit the Planning Division webpage at:

<https://vcrma.org/en/proposed-oil-and-gas-regulations>

A public hearing will be held by the **Planning Commission of Ventura County on Thursday, July 28, 2022, at 8:30 a.m.**, at 800 S. Victoria Avenue, Ventura CA 93009, County Government Center, Hall of Administration, Board of Supervisors Hearing Room, to consider the matter below. Inquiries on this item may be directed to Case Planner, Shelley Sussman, at (805) 654-2493 or by e-mail to Shelley.Sussman@ventura.org.

The Planning Commission staff report will be available on the Planning Division's website at <https://vcrma.org/en/planning-commission> or at the Planning Division, a week before the public hearing.

PROVIDING PUBLIC COMMENTS: Public comments may be provided using the following options:

In Advance of Hearing - If you wish to submit your comments in advance of the meeting, please submit your comment to the Case Planner, Shelley Sussman, by email at Shelley.Sussman@ventura.org by 3:30 p.m. on the day prior to the hearing. Please indicate in the Subject Line of your email, the Agenda Item Number on which you are commenting. Your email will be distributed to the Planning Commissioners and placed into the item's record at the Planning Commission hearing.

In Person During Hearing – If you wish to make a comment in-person, you must be present at the meeting location and provide your comment prior to the close of the public comment period for the item you wish to speak on.

On Zoom During Hearing– Register at <https://vcrma.org/public-comments-for-planning-commission-hearings> before the close of the Commission hearing regarding this project. Please provide your name, email, and the phone number you will be calling in from. Once your registration has been approved, you will receive an email with the Zoom meeting link and password. The participation information is unique to you; please do not share as it may cause issues with your ability to join the meeting. **Pre-registration is strongly encouraged.** Registration opens when the Planning Commission's July 28, 2022 meeting agenda is posted, which is projected to occur on July 21, 2022 at 5:00 p.m.

TO LISTEN AND PARTICIPATE IN SPANISH: If you would like to listen and participate in Spanish using video or telephone during the hearing, you can receive Zoom credentials by registering at <https://vcrma.org/public-comments-for-planning-commission-hearings>. While registering, please check the box for "Spanish Participation." An email with the Zoom meeting link and password will be sent once your registration has been approved. You can then watch the meeting in Spanish through the Spanish channel during this agenda item.

In addition to the upcoming Planning Commission hearing, a public hearing will be held before the Ventura County Board of Supervisors on a future date. Any person may attend and be heard on this matter. If you challenge the above-described action in court, you may be limited to raising only those issues you or someone else raised at the public hearing described in this Notice, or in written correspondence delivered to the County of Ventura at, or prior to, the public hearing.