



June 19, 2020

VIA EMAIL

6/19/2020

Ms. Kristina Boero, Manager , Senior Planner
Ventura County Planning Division
County Government Center Hall of Administration
800 S. Victoria Ave. #1740
Ventura, CA 93009

Governor's Office of Planning & Research

Jun 25 2020

STATE CLEARINGHOUSE

Dear Ms. Boero:

CARBON CALIFORNIA OIL AND GAS PROJECT (CUP CODIFICATION CASE NUMBER PL13-0158), STATE CLEARINGHOUSE NUMBER 2015021045

The California Geologic Energy Management Division (CalGEM) has reviewed the Draft Revised Subsequent Environmental Impact Report for the above referenced project dated April 2020. The project is located on the Agnew lease in the Ojai oil and gas field, APN 040-0-220-165. CalGEM provides the following comments.

1. Throughout the draft environmental impact report, please change "Division of Oil, Gas & Geothermal Resources" or "Division of Oil & Gas" to our new name "California Geologic Energy Management Division". Also, change the acronym "DOGGR" to "CalGEM".
2. With the mission of safeguarding public health and protecting the environment, CalGEM administers regulations and procedures pertaining to all oil and gas wells on California public and private land and offshore. Operators must obtain CalGEM approval and permits for a variety of activities, including drilling, reworking, and plugging and abandoning oil wells. Wells must be constructed and maintained in accordance with CalGEM regulations. No well work may be performed on any oil, gas, or geothermal well without written approval from CalGEM. This also includes, but is not limited to, mitigating leaking gas or other fluids from plugged and abandoned wells, modifications to well casings, and/or any re-abandonment work. The County documents received indicate a modification request to (CUP) Number 3543 to allow the drilling of two new oil wells and re-drilling of one existing well. These operations will require CalGEM review and approval.
3. CalGEM regulates all oil and gas production equipment between the wellhead, where oil or gas leaves the ground, and the sales meter, where ownership or custody changes. CalGEM's jurisdiction extends to production facilities including, but not limited to, tanks, pumps, valves, compressors, safety systems, separators, manifolds, and pipelines associated with oil and gas production and injection

operations. Existing and newly installed pipelines shall be designed, constructed, and all pipelines shall be tested, operated, and maintained in accordance with good oil field practice and applicable standards. The Supervisor may order modifications to such facilities. Operators are also required to prepare and submit a Pipeline Management Plan (PMP) to CalGEM. Facilities that store or process fluids must have secondary containment measures in place, as well as a Spill Contingency Plan (SPCC) filed with CalGEM. The Supervisor may require an updated SPCC to ensure that the plan addresses current conditions if new facilities are added.

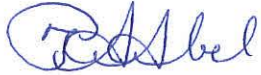
4. The existing flare shall be operated with good oil field practices and applicable standards. State Public Resources Code (PRC) section 3300 states that "The unreasonable waste of natural gas by the act, omission, sufferance, or insistence of the lessor, lessee or operator of any land containing oil or gas, or both, whether before or after the removal of gasoline from the gas, is opposed to the public interest and is unlawful." PRC section 3011 states that a goal of CalGEM is the "reduction and mitigation of greenhouse gas emissions associated with the development of hydrocarbon and geothermal resources" and it "shall coordinate with other state agencies... to help support the state's clean energy goals."
5. The draft environmental impact report should consider environmental impacts of any potential well work or plugging and abandonment operations after wells have been drilled or re-drilled.
6. Figures 3.1-1 and 3.1-2 do not seem to show the correct location of the Agnew Lease. In Figure 3.1-1 the project location maybe ~ 2 miles to the east and in Figure 3.1-2 the project site should be moved ~1,500 feet northeast.
7. CalGEM statutes and regulations applicable to oil and gas exploration, production, drilling, and related operations can be viewed on our agency website using the following link:
<https://www.conservation.ca.gov/index/Documents/CALGEM-SR-1%20Web%20Copy.pdf>

As indicated in PRC section 3106, CalGEM has jurisdictional authority over the drilling, operation, maintenance, and abandonment of oil, gas, and geothermal wells, and attendant facilities, to prevent, as far as possible, damage to life, health, property, and natural resources, damage to underground oil, gas, and geothermal deposits, and damage to underground and surface waters suitable for irrigation or domestic purposes. In addition to CalGEM's authority to order work on wells pursuant to PRC sections 3208.1 and 3224, it has authority to issue civil and criminal penalties under PRC sections 3236, 3236.5, and 3359 for violations within CalGEM's jurisdictional authority. CalGEM does not regulate grading, excavations, or other land use issues.

June 19, 2020
Ms. Kristina Boero
Ventura County Planning Division

Thank you for considering CalGEM's comments. If you have any questions, please contact our District office at (805) 937-7246 or via email at CalGEMCoastal@conservation.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Patricia A. Abel". The signature is written in a cursive style with a large initial "P".

Patricia A. Abel
Coastal District Deputy

JL:ks

cc: Chrono
CEQA
CEQA HQ
Email: kristina.boero@ventura.org

