

MINUTE ITEM
This Calendar Item No. 33
was approved as Minute Item
No. 33 by the State Lands
Commission by a vote of 2
to 0 at its 9-23-87
meeting.

CALENDAR ITEM

A 35

33

09/23/87

S 18

PRC 410

Willard

APPROVAL OF DRILLING WELL "STATE 410" 15

LESSEE: Bush Oil Company
Attn.: Mr. Harvey L. Bryant
President
P. O. Box X
Taft, California 93268

AREA: Rincon Offshore Field, Ventura County.

STATUTORY AND OTHER REFERENCES:

- A. P.R.C.: Div. 6, Parts 1 and 2; Div. 13.
- B. Cal. Adm. Code: Title 2, Div. 3; Title 14, Div. 6.

AB 884: N/A.

OTHER PERTINENT INFORMATION:

The Lessee proposes to drill an onshore exploratory well which will bottom in the Deep Zone to evaluate potential recoverable oil and gas reserves from this zone. Should commercially recoverable reserves be proven, the well would be placed on production and the production would be processed through existing production facilities. The surface location of the well and the existing production facilities are on adjacent uplands. No modification of surface facilities is required. Produced oil and gas would be transported from the area via existing pipeline that connects with an existing distribution system.

The project will be conducted in accordance with the lease terms and the rules and regulations of the State Lands Commission and the Division of Oil and Gas.

CALENDAR ITEM NO. 33 (CONT'D)

ENVIRONMENTAL INFORMATION:

The Ventura County Planning Commission has approved a Conditional Use Permit 16, Modification No. 1 covering the drilling of the subject well. A Mitigated Negative Declaration was prepared and certified by Ventura County Planning Commission on August 21, 1986. The Mitigated Negative Declaration is attached as Exhibit "B". The State Lands Commission's staff has reviewed the document and believes that it complies with the requirements of the CEQA.

This activity involves lands identified as possessing significant environmental values pursuant to P.R.C. 6370, et. seq. Based upon the staff's consultation with the persons nominating such lands and through the CEQA review process by the County of Ventura, it is the staff's opinion that the permit as part of the program for the project, as proposed, is consistent with its use classification.

EXHIBITS:

- A. Location Map.
- B. Mitigated Negative Declaration.

IT IS RECOMMENDED THAT THE COMMISSION:

1. FIND THAT A NEGATIVE DECLARATION WAS PREPARED FOR THIS PROJECT BY THE VENTURA COUNTY PLANNING COMMISSION AND THAT THE COMMISSION HAS REVIEWED AND CONSIDERED THE INFORMATION THEREIN.
2. DETERMINE THAT THE PROJECT, AS MITIGATED, ANALYZED AND APPROVED, WILL NOT HAVE A SIGNIFICANT EFFECT ON THE ENVIRONMENT.
3. FIND THAT THIS ACTIVITY AS PROPOSED IS CONSISTENT WITH THE USE CLASSIFICATIONS DESIGNATED FOR THE LANDS PURSUANT TO P.R.C. 6370, ET. SEQ..
4. AUTHORIZE THE APPROVAL OF WELL "STATE 410" 15 UNDER STATE OIL AND GAS LEASE PRC 410, IN ACCORDANCE WITH THE TERMS, CONDITIONS AND REGULATIONS OF THE STATE LANDS COMMISSION.

EXHIBIT "A"
STATE LANDS COMMISSION

PRC 410.1

Proposed Well "State 410" 15
Bush Oil Company

Ventura County

8-12-1987

K.T.K.



CARPINTERIA
7 MILES

VENTURA COUNTY

P.R.C. 1466

PRC
429

PRC

427

PRC
410

VENTURA
9 MILES

P.R.C.

145

SANTA BARBARA CHANNEL

PRC
3184

1000 0 1000 2000 3000 FEET



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EXHIBIT "B"

COUNTY OF VENTURA
RESOURCE MANAGEMENT AGENCY
800 S. Victoria Avenue
Ventura, CA 93009

MITIGATED NEGATIVE DECLARATION

A. PROJECT DESCRIPTION:

1. Entitlement: Conditional Use Permit 16, Modification No. 1
2. Applicant: Norris Oil Company
3. Location: (See attached map) Rincon Oilfield, approximately 800 feet northwest of the Seacliff offramp, between the Pacific Coast Highway and U.S. 101, approximately 9 miles northwest of the City of Ventura.
4. Assessor Parcel No(s): 60-10-23
5. Parcel Size: 2.6 Acres
6. General Plan Designation: Open Space on the Open Space Element
7. Existing Zoning: "C-O-S" (Coastal Open Space)
8. Proposal: The redrilling of one existing oil well (Hobson State #12), and the drilling of 3 new oil wells on the Hobson State 410 Lease CUP-16 was granted in 1948 for the production of oil and gas on three parcels of land in the Rincon Oilfield. In March, 1985, Norris Oil Company began the redrilling of Hobson State Well #12, with the understanding that this activity was covered under CUP-16, based on a 1975 Coastal Commission letter to Norris which stated that redrilling did not require a Coastal Zone Permit. In July, 1985, the California Coastal Commission determined that this interpretation was no longer valid, because it was the Coastal Zone Conservation Act which expired in late 1976 and was replaced by the Coastal Act of 1976. More recently Ventura County has been delegated authority to process Coastal Development permits, and Ventura County's Local Coastal Plan and Coastal Zone Ordinance require a coastal permit for oil well drilling or redrilling within the Coastal Zone. Norris has applied for a modification to CUP-16 to cover the redrilling (now completed) and also for three new wells to be drilled over a three year period. The proposed wells are to be located within 300 feet of Hobson State #12, in an existing oil production area.
9. Responsible Agencies: Division of Oil and Gas

B. STATEMENT OF ENVIRONMENTAL FINDINGS:

An Initial Study was conducted by the Planning Division to evaluate the potential effect of this project on the environment. Based on the findings contained in the attached Initial Study it has been determined that this project could have a significant effect on the environment. These potentially significant impacts can be satisfactorily mitigated through adoption of the following identified measures as conditions of approval.

C. MITIGATION MEASURES INCLUDED TO AVOID POTENTIALLY SIGNIFICANT EFFECTS:

Air Quality: The Air Pollution Control District comments that nitrogen oxide emissions created by the drilling rig engines during the drilling of the wells may have a significant impact on air quality in the Ojai Valley Airshed, and may be inconsistent with the Air Quality Management Plan.

Mitigation: The applicant shall reduce nitrogen oxide emissions as much as feasible from the drilling operation by one of the following methods, per the approval of the Air Pollution Control District:

- a. using utility generated electrical power
- b. using propane fueled engines with catalytic converters
- c. using diesel engines equipped with combustion prechambers, or using combustion timing retardation
- d. obtaining emission offsets

Light and Glare: The drilling rig will be lighted at night during the drilling period and will be visible from U.S. Highway 101.

EXHIBIT "5"

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mitigation: Lighting shall be controlled so as not to produce excessive light and glare by directing the light away from the highway and primarily on to the work area.

D. PUBLIC REVIEW:

1. Legal Notice Method: Direct mailing to property owners within 300 feet of proposed project boundary.
2. Document Posting Period: April 14, 1986 - May 13, 1986
3. Environmental Report Review Committee Hearing: May 14, 1986

E. COMMENTS RECEIVED DURING REVIEW AND AGENCY RESPONSE

1. Letter May 7, 1986 from Coastal Commission (response attached).

Prepared by: Marcia Wakelee

Reviewed by: Robert K. Jung 5-20-86

The Environmental Report Review Committee recommends that the decision-making body of the proposed project find that this document has been completed in compliance with the California-Environmental Quality Act.

Bruce Smith
Chair, Environmental Report
Review Committee

5/14/86
Date

MW:jl/C329

INITIAL STUDY CHECKLIST

I. PROJECT INFORMATION

1. Name of Applicant: Norris Oil Co.
2. Project Description: Re-drill one well and drill 3 new wells
3. Project Location: Recon
4. Checklist Preparer: Marcia Wakelee

II. ENVIRONMENTAL IMPACTS

Each category checked requires that a determination be made if the project would or would not have a "significant" effect on the environment. Each environmental category contains a different set of criteria for what constitutes a significant adverse impact. Professional judgement is needed to determine significance. The term "significant" is defined in the CEQA Guidelines as "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the activity including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance." The CEQA Guidelines also provides an explanation for determining significant effects and establishes mandatory findings of significance in certain instances (Reference Sections 15064 and 15065).

The potential "maybe" impacts are difficult to determine. This is a matter of professional judgement which requires analysis of the facts and information submitted with the project. In determining potentially significant impacts for the "yes" and "maybe" answers, an explanation sheet must be attached to the initial study. The attachment should include the following information for each "yes" and "maybe" answer:

1. A brief description about the background and setting of the issue.
2. A brief description of the potential significant impacts and disclosure of why they could occur.
3. Description of any mitigation measure(s) which would reduce the impacts to an insignificant level.
4. In the event that project mitigation is indeterminate or that mitigation measures cannot reduce the impacts to an insignificant level, a statement explaining why further analysis (EIR) is needed should be provided.

Revised June 1985

	<u>Yes</u>	<u>Maybe</u>	<u>No*</u>
<u>PLANNING DIVISION</u>			
1. <u>Land Use</u>			
Will the proposal, individually or cumulatively, be inconsistent with/er substantially alter present or planned land use of an area?	---	---	X
2. <u>Population</u>			
Will the proposal, individually or cumulatively, significantly alter the location, distribution, density, or growth rate of the human population of an area?	---	---	X
3. <u>Housing</u>			
Will the proposal, individually or cumulatively, significantly affect existing housing, or create a demand for additional housing?	---	---	X
4. <u>Planning Consistency</u>			
Will the proposal, individually or cumulatively, be inconsistent with any goal, objective, policy or program of the General Plan, Water Quality Management Plan, Guidelines for Orderly Development or any other Board-adopted policy document?	---	---	X
5. <u>Mineral Resources</u>			
Will the proposal, individually or cumulatively, result in a significant:			
a. Increase in the rate or use of any mineral resource?	---	---	X
b. Substantial depletion of any non-renewable mineral resources?	---	---	X

AIR POLLUTION CONTROL DISTRICT

6. <u>Air</u>			
Will the proposal, individually or cumulatively, result in significant:			
a. Deterioration of ambient-air quality?	---	X	---
b. Objectionable odors?	---	---	X

PUBLIC WORKS AGENCY

7. <u>Earth</u>			
Will the proposal, individually or cumulatively, result in, or be impacted by, significant:			
a. Unstable earth conditions or in changes in geologic substructures?	---	---	X
b. Disruptions, displacements, compaction or overcovering of the soil?	---	---	X
c. Change in topography or ground surface relief features?	---	---	X

*The county reviewing agency has determined this issue not to be significant.

De0/2

	<u>Yes</u>	<u>Maybe</u>	<u>No</u>
d. The destruction, covering or modification of any unique geologic or physical features?	—	—	X
e. Increase in wind or water erosion of soils, either on or off the site?	—	—	X
f. Changes in deposition or erosion of beach sands, or changes in siltation, deposition or erosion which may modify the channel of a river or stream or the bed of the ocean or any bay, inlet or lake?	—	—	X
g. Exposure of property to geologic hazards such as earthquakes, landslides, mudslides, ground failure, liquefaction, tsunami or similar hazards?	—	—	X
8. <u>Transportation/Circulation</u>			
Will the proposal, individually or cumulatively, result in significant:			
a. Generation of substantial additional vehicular movement?	—	—	X
b. Effects on existing parking facilities, or demand for new parking?	—	—	X
c. Impacts upon existing transportation systems?	—	—	X
d. Alterations to present patterns of circulation or movement of people and/or goods?	—	—	X
e. Alterations to rail traffic?	—	—	X
f. Increase in traffic hazards to motor vehicles, bicyclists or pedestrians?	—	—	X
9. <u>Flood Control</u>			
Will the proposal, individually or cumulatively, result in significant:			
a. Changes to absorption rates, drainage patterns, or the route and/or amount of surface water runoff?	—	—	X
b. Alteration to the course or flow of flood waters?	—	—	X
c. Exposure of people, property or unique natural resources to hazards such as flooding or tsunami?	—	—	X
d. Effects on a channel or stream regulated by the Flood Control District?	—	—	X
10. <u>Water Resources</u>			
Will the proposal, individually or cumulatively, result in significant:			
a. Changes in the amount of surface water in any body of water?	—	—	X
b. Changes in currents, or the course or direction of water movements, in any body of water?	—	—	X

* The County reviewing agency has determined this issue not to be significant.

DC0/3

	<u>Yes</u>	<u>Maybe</u>	<u>No*</u>
c. Discharge into surface waters, or any alteration of surface water quality, including but limited to temperature, dissolved oxygen or turbidity?	—	—	<u>X</u>
d. Alteration of the direction or rate of flow of groundwaters?	—	—	<u>X</u>
e. Change in the quality of groundwaters, either through direct additions or withdrawals, or through interception of an aquifer by cuts, excavations or surface coverings?	—	—	<u>X</u>
f. Reduction in the amount of water otherwise available for public water supplies?	—	—	<u>X</u>
11. <u>Street Lighting</u>			
Will the proposal, individually or cumulatively, result in the need for street lighting services?	—	—	<u>X</u>
<u>ENVIRONMENTAL HEALTH DIVISION</u>			
12. <u>Sanitation</u>			
If the proposal will utilize septic tank systems, can the sewage generated by the project create a significant adverse health impact?	—	—	<u>X</u>
13. <u>Water Supply</u>			
Will the proposal, individually or cumulatively, not be able to be provided with a long-term water supply of adequate quantity and quality?	—	—	<u>X</u>
14. <u>Solid Waste</u>			
Will the proposal, individually or cumulatively, result in:			
a. A significant amount of solid waste?	—	—	<u>X</u>
b. A significant impact on the existing solid waste disposal system?	—	—	<u>X</u>
15. <u>Risk of Upset</u>			
Does the proposal, individually or cumulatively, involve:			
a. A risk of an explosion or the release of hazardous substances (including, but not limited to, oil, pesticides, chemicals or radiation) in the event of an accident or upset conditions?	—	<u>X</u>	—
b. Possible interference with an emergency response plan or an emergency evacuation plan?	—	—	<u>X</u>
16. <u>Human Health</u>			
Will the proposal, individually or cumulatively, result in:			
a. Creation of any health hazard or potential health hazard (excluding mental health)?	—	—	<u>X</u>

D60/4

The County reviewing agency has determined this

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	<u>Yes</u>	<u>Maybe</u>	<u>No</u>
b. Exposure of people to potential health hazards?	—	—	X
<u>FIRE PROTECTION DISTRICT</u>			
17. Will the proposal, individually or cumulatively, result in impacts on the ability of the Fire Protection District to serve the project due to:			
a. Availability of personnel or equipment?	—	—	X
b. Location of the project?	—	—	X
c. Public infrastructure and availability of water for firefighting purposes?	—	—	X
<u>SHERIFF'S DEPARTMENT</u>			
18. Will the proposal, individually or cumulatively, result in impacts on the ability of the Sheriff's Department to serve the project due to:			
a. The design of the proposal (i.e., defensible space between dwelling units, topography and open space)?	—	—	X
b. The design of roads and circulation?	—	—	X
c. The location or size of the project?	—	—	X
<u>PROPERTY ADMINISTRATION AGENCY</u>			
19. <u>Recreation</u>			
Will the proposal, individually or cumulatively, result in a significant impact on existing recreational opportunities or facilities?	—	—	X
20. <u>Harbors and Navigation</u>			
Will the proposal, individually or cumulatively, result in a significant impact on harbors or navigation?	—	—	X
21. <u>Historical (Cultural Heritage Board)</u>			
Will the proposal, individually or cumulatively, result in adverse physical or aesthetic effects to any historic building or area or would affect unique cultural values?	—	—	X
<u>AIRPORTS DEPARTMENT</u>			
22. Will the proposal, individually or cumulatively, result in impacts on the community due to:			
a. Air traffic safety problem?	—	—	X
b. Adverse affect on existing facilities?	—	—	X
c. Changes in flight patterns?	—	—	X
<u>SUPERINTENDENT OF SCHOOLS</u>			
23. <u>Education</u>			
Will the proposal, individually or cumulatively, result in a significant impact on existing or proposed educational facilities:			
a. Affect the size or composition of classes?	—	—	X

D50/S

The County reviewing agency has determined this issue not to be significant.

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- | | <u>Yes</u> | <u>Maybe</u> | <u>No</u> |
|--|------------|--------------|-----------|
| b. Result in the need for additional classrooms, personnel or additional facilities? | — | — | <u>X</u> |

AGRICULTURAL DEPARTMENT

24. Agricultural Resources

Will the proposal, individually or cumulatively, result in significant:

- | | | | |
|---|---|---|----------|
| a. Conversion of prime agricultural land to other uses? | — | — | <u>X</u> |
| b. Loss of productive crop land or soils? | — | — | <u>X</u> |
| c. Adverse affect on adjacent agricultural land? | — | — | <u>X</u> |

AREAS TO BE COMPLETED BY THE AGENCY RESPONSIBLE FOR ADMINISTERING THE PROJECT

25. Visual Effects

Will the proposal, individually or cumulatively, result in the obstruction of a scenic resource or view open to the public, or will the proposal result in the creation of an aesthetically offensive site open to public view?

—	<u>X</u>	—
---	----------	---

26. Public Services

Will the proposal, individually or cumulatively, have an effect upon, or result in a need for new or altered, governmental services in any of the following areas:

- | | | | |
|---------------------------------------|---|---|----------|
| a. Sovers or sewage treatment plants? | — | — | <u>X</u> |
| b. Water mains or storage facilities? | — | — | <u>X</u> |
| c. Other public facilities? | — | — | <u>X</u> |

27. Archaeological

Will the proposal affect site(s) that:

- | | | | |
|--|---|---|----------|
| a. Are recognized as significant in California or American history or recognized as scientifically important in prehistory? | — | — | <u>X</u> |
| b. Can provide information which is both of demonstrable public interest and useful in addressing scientifically consequential and reasonable archaeological research questions? | — | — | <u>X</u> |
| c. Has a special or particular quality such as oldest, best example, largest, or last surviving example of its kind? | — | — | <u>X</u> |
| d. Is at least 100 years old and possesses substantial stratigraphic integrity? | — | — | <u>X</u> |
| e. Involve important questions that historical research has shown can only be answered with the use of archaeological techniques? | — | — | <u>X</u> |

The county reviewing agency has determined this issue not to be significant.

D60/6

Yes Maybe Now

28. Utilities

Will the proposal individually or cumulatively, impact or result in a need for new public service systems, or substantial alterations to the following utilities?

- | | | | |
|--------------------------------|---|---|---|
| a. Electricity or natural gas? | — | — | X |
| b. Communication systems? | — | — | X |

29. Energy

Will the proposal result in:

- | | | | |
|---|---|---|---|
| a. Use of substantial amounts of fuel or energy? | — | — | X |
| b. Substantial increase in demand upon existing sources of energy, or require the development of new sources of energy? | — | — | X |

30. Noise

Will the proposal, individually or cumulatively, result in significant:

- | | | | |
|---|---|---|---|
| a. Increases in existing noise levels? | — | X | — |
| b. Exposure of people to severe noise levels? | — | — | X |

31. Light and Glare

Will the proposal produce significant amounts of light or glare?

- | | | |
|---|---|---|
| — | X | — |
|---|---|---|

32. Plant Life

Will the proposal result in:

- | | | | |
|---|---|---|---|
| a. Change in the diversity of species, or number of any species of plants (including trees, shrubs, grass, and aquatic plants)? | — | — | X |
| b. Reduction of the numbers of any unique, rare or endangered species of plants? | — | — | X |
| c. Introduction of new species of plants into an area, or in a barrier to the normal replenishment of existing species? | — | — | X |

33. Animal Life

Will the proposal result in:

- | | | | |
|--|---|---|---|
| a. Change in the diversity of species, or numbers of any species of animals (birds, land animals including reptiles, fish and other fish, benthic organisms or insects)? | — | — | X |
| b. Reduction of the numbers of any unique, rare or endangered species of animals? | — | — | X |
| c. Introduction of new species of animals into an area, or result in a barrier to the migration or movement of animals? | — | — | X |

0607

The County reviewing agency has determined this issue not to be significant.

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d. Deterioration to existing fish or wildlife habitat? X

III. MANDATORY FINDINGS OF SIGNIFICANCE

- | | <u>Yes</u> | <u>Maybe</u> | <u>No</u> |
|--|------------|--------------|--------------|
| 1. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? | — | — | <u> X </u> |
| 2. Does the project have the potential to achieve short-term, to the disadvantage of long-term, environmental goals? (A short-term impact on the environment is one which occurs in a relatively brief, definitive period of time while long-term impacts will endure well into the future). | — | — | <u> X </u> |
| 3. Does the project have impacts which are individually limited, but cumulatively considerable? (Several projects may have relatively small individual impacts on two or more resources, but the total of those impacts on the environment is significant). | — | — | <u> X </u> |
| 4. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? | — | <u> X </u> | — |

• The county reviewing agency has determined this issue not to be significant.

Notes:

1. See Environmental Issues and Mitigations, Item No. 6 - Air Quality, and also response to Coastal Commission letter of May 7, 1986 (attached)
2. See Environmental Issues and Mitigations, Item No. 15 - Risk of Upset discussion.

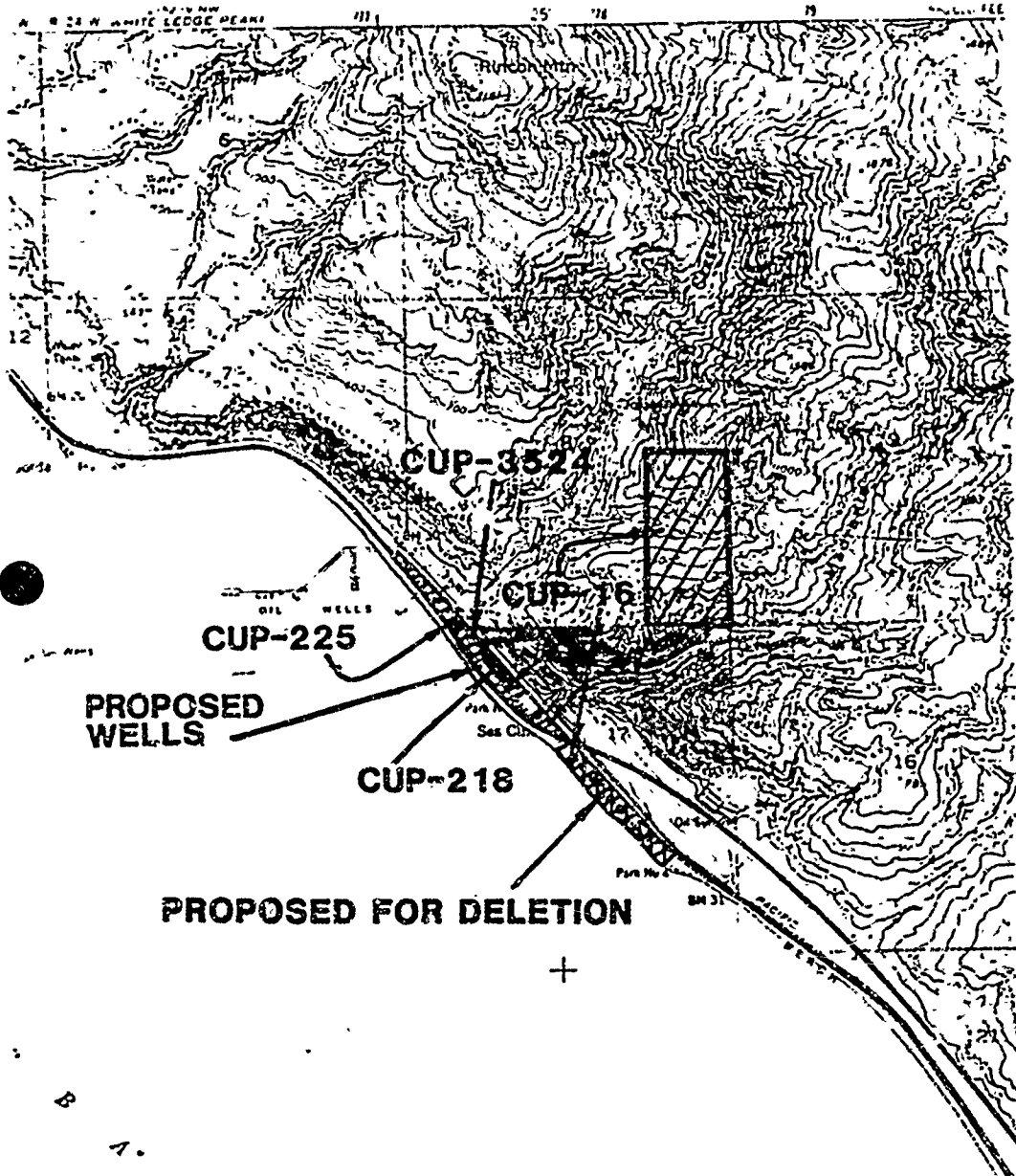
ENVIRONMENTAL ISSUES AND MITIGATIONS

II.

6. Air Quality: The Air Pollution Control District comments that the nitrogen oxide emissions created by the drilling rig engines during the drilling of the oil wells may have a significant impact on air quality in the Ojai Valley Airshed, and may be inconsistent with the Air Quality Management Plan. The applicant shall mitigate emissions as much as feasible from the drilling operation by one of the following methods, per the approval of the Air Pollution Control District:
 - a. using utility generated electrical power;
 - b. using propane fueled engines with catalytic converters;
 - c. using diesel engines equipped with combustion prechambers, or using combustion timing retardation;
 - d. obtaining emission offsets.
15. Risk of Upset: Activities involved in drilling and production of oil and gas could involve a risk of upset such as oil spills, emissions to the air, nuisance odors, well blowout, fire or explosion. However, the Zoning Ordinance requires the applicant to comply with the regulations of the California Division of Oil and Gas, County Fire Department and the Air Pollution Control District. Compliance with these regulations will reduce the risk of upset to an insignificant level.
25. Visual Effects: The wells are to be drilled one at a time over a period of three years. During the drilling period, estimated at 45 to 50 days for each well, the drilling rig will be visible to the surrounding area. The project location, however, is in the midst of an established oil field which contains numerous oil wells, storage tanks and other production facilities, with a gas processing plant directly to the east. There are no residences in the area. The rig will be visible from U.S. 101, but the relatively short drilling period, plus the character of the surrounding area, should render the visual effects insignificant.
30. Noise: During the drilling period, there will be some increase in the noise level in the area. There are no residences within 2000 feet, however, and the freeway, railroad and existing oil production activities all contribute to the ambient noise level. The relatively short drilling period, plus the existing uses, render the noise impact insignificant. Noise standards as set forth in the Ventura County Oil Ordinance shall be adhered to.
31. Light and Glare: The drilling rig will be lighted at night during the drilling period that would be visible from U.S. Highway 101. Lighting shall be controlled so as not to produce excessive light and glare, by directing the light away from the highway and primarily onto the work area.

MW:j/C333

STATE OF CALIFORNIA
DEPARTMENT OF WATER RESOURCES



PROPOSED
WELLS

PROPOSED FOR DELETION

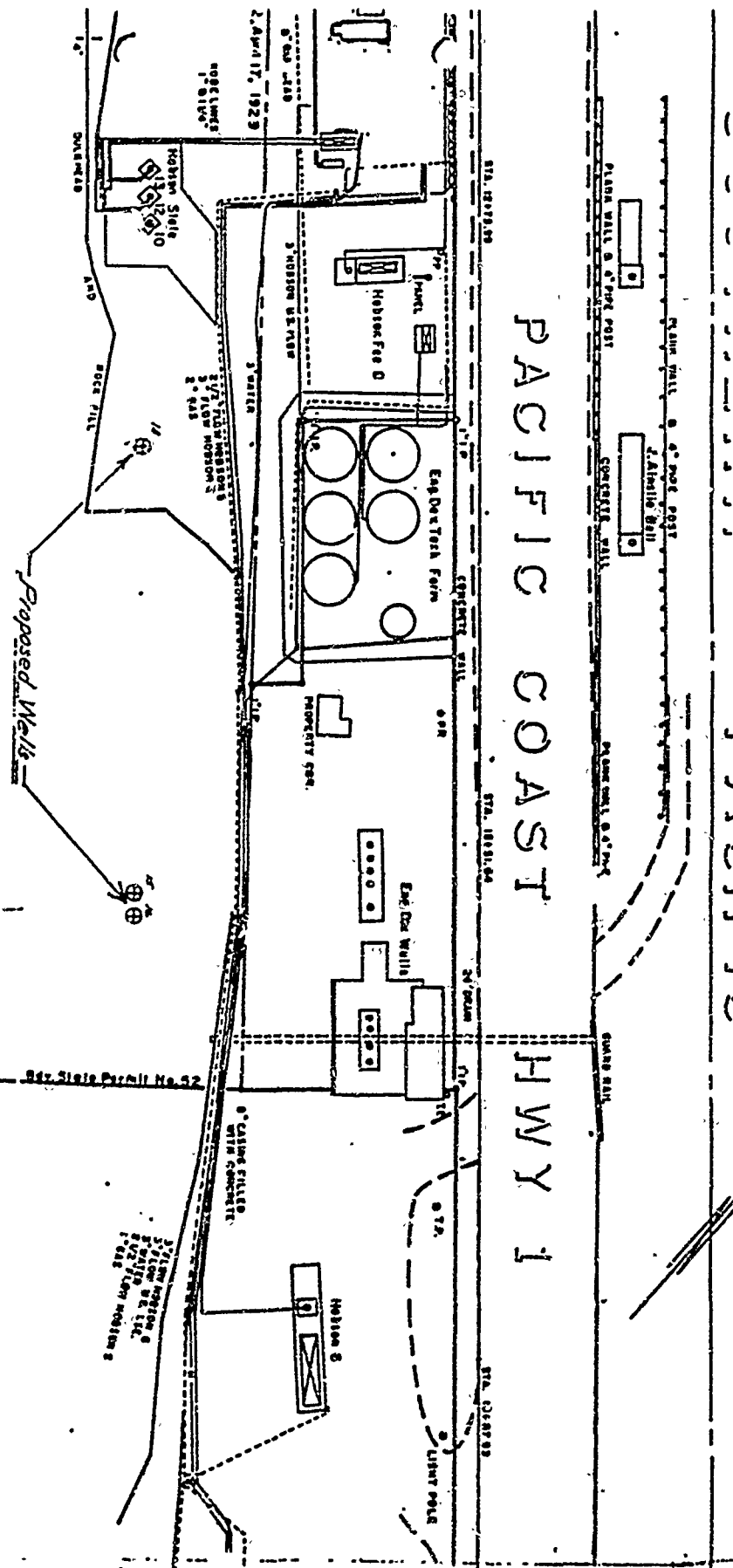
Ventura County
Resource
Management
Agency

CUP-16-1



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PACIFIC COAST HWY 1



RC 410.1

Norris Oil Co.

Scale: 1"=50'

CALIFORNIA COASTAL COMMISSION

501 HOWARD STREET 4TH FLOOR
SAN FRANCISCO, CA 94105
(415) 343-8333

May 7, 1986 10:51 AM

Marcia Wakelee
Ventura County Planning Division
800 S. Victoria
Ventura, CA 93009

Dear Ms. Wakelee:

Coastal Commission staff has reviewed the Draft Negative Declaration for the redrilling and new drilling of oil wells on the Hobson leases (SCH 86040910). We have identified a few points we believe need to be addressed and offer the following comments on the document.

The document states that there are no cumulative impacts resulting from continued development of these fields. Based on the data presented in the report, we do not believe that this finding can be supported. We recommend that that additional data be incorporated into the report to support this finding or lacking the data the finding be changed to "maybe".

Under solid waste, the document states that no waste products will be generated by this activity. What are the amounts of drilling muds and cuttings that will be generated by this proposal and how are these materials to be disposed of? Also, what is the amount of truck traffic that will be associated with the removal of the waste products?

Under risk of upset, the report states that there maybe a risk of an upset with this activity. Coastal Commission experience in reviewing oil and gas development has shown that there is always a high risk of upset in this type of activity. We therefore recommend that this finding be changed to yes.

Please contact me if you have any questions on this matter.

Sincerely,

Joe Nicholson
Supervising Analyst
Energy and Ocean Resources

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RESOURCE MANAGEMENT AGENCY
County of Ventura

Planning Division

Thomas Berg
Manager

May 20, 1986

Joe Nicholson
California Coastal Commission
631 Howard Street, 4th Floor
San Francisco, CA 94105

Dear Mr. Nicholson:

Thank you for the Coastal Commission's comments, dated May 7, 1986, on the Draft Negative Declaration for the redrilling of one oil well and the drilling of three new oil wells on the Hobson State 410 Lease (SCH 86040910). The Ventura County Environmental Report Review Committee reviewed the draft Negative Declaration on May 14, 1986 and considered the issues raised regarding cumulative impacts, solid waste and risk of upset.

In regard to cumulative impacts, the Committee determined that the "no" finding was appropriate for the following reasons. The proposed wells will be drilled one at a time, with a drilling period of 45 to 50 days for each well, over a period of three years, and will be located in the midst of an established oil field. No grading or roadbuilding will be required, and the storage tanks, vapor recovery system and the oil and gas pipelines already exist. Impacts from this project, therefore, would occur during the drilling phase, and would be limited and temporary in nature. The applicant has agreed to measures proposed by the Air Pollution Control District to mitigate the air quality impacts associated with the project. The Planning Department is not currently processing any other oil well drilling applications in the Rincon area, so this project is not expected to have significant cumulative impacts with other such projects in the area.

Regarding solid waste, the applicant estimates that approximately 177.8 cubic yards of earth would be removed as cuttings from each well. This material would be hauled to an approved dump site. The drilling mud is removed as liquid waste. It is collected in bins to dry out and the remains are hauled to an approved dump site. In this area, fresh water drilling fluids are used, and these are classified as non-hazardous. The amount of drilling mud required for the drilling operation varies, and is difficult to estimate. The applicant feels that not more than two or three trucks per week would be needed to remove the solid waste. The Ventura County Environmental Health Department has reviewed these estimates, and has found that there will not be a significant impact due to solid waste.

The Environmental Report Review Committee agreed with the Coastal Commission that there is always a risk of upset with oil drilling activities, and determined that the finding of "maybe" was appropriate because the discussion provided with this

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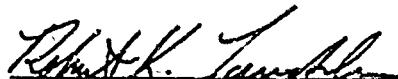
Joe Nicholson
May 20, 1986
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item covered the possible risks, and determined that compliance with the regulations of the Division of Oil and Gas, the Fire Department and the Air Pollution Control District would reduce these risks to an insignificant level.

If you have any questions, please call Marcia Wakelee at (805) 654-1479.

Sincerely,

RESOURCE MANAGEMENT AGENCY


Robert K. Laughlin, Supervisor
Commercial/Industrial Land Use Section

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