



Ventura County Coalition of Labor, Agriculture and Business

P.O. Box 4237, Ventura, CA 93007

Email: execdirector@colabvc.org

www.colabvc.org

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CA Department of Conservation
Division of Oil, Gas and Geothermal Resources
801 K Street, MS 18-00
Sacramento, CA 95814-3530

Transmitted via email to: SB4EIR@conservation.ca.gov

Comments on the NOP for EIR for Oil and Gas Stimulation Treatments – District 2, Ventura

Attention: Ms. Adele Lagomarsino

Thank you for the opportunity for Colab, Ventura County, to comment on the above Notice of Preparation (NOP). We are in support of the Department of Conservation's mission to "balance today's needs with tomorrow's challenges and foster intelligent, sustainable, and efficient use of California's energy, land and mineral resources." In Ventura County, as well as across the Country, our citizens rely on oil and gas resources to provide transportation; heating, cooling and lighting of our homes and offices, preservation of our food and a myriad of products that make modern living possible.

The CA Division of Oil and Gas (DOGGR) have historically provided effective regulation of the oil and gas industry, supported by their statement that "hydraulic fracturing has been used as a production stimulation method for more than 30 years with no reported damage to the environment." We agree that existing regulatory requirements for drilling and completing wells in California have been remarkably protective of the environment, particularly groundwater resources.

As environmental impacts of stimulation techniques are to be evaluated under the CA Environmental Quality Act (CEQA) per newly enacted legislation, we support a project level EIR that will be inclusive of all impacts over the baseline of existing conditions. Impacts must be reasonably foreseeable and based on a district's geology and historical data. The project EIR needs to support future well stimulation activities that are common practice in the industry, prescribing reasonable mitigation, if necessary. We do not believe, under the CEQA guidelines, that mitigation can be prescribed for past well practices.

CoLAB supports the proposed objectives and scope of the EIR in the NOP especially that it be "comprehensive" and "characterized as one large project" evaluated over the six administrative districts. We agree that DOGGR should be the lead agency in environmental review of well stimulation techniques. We do not support a process that would require subsequent CEQA review of individual well activities which we believe would cause unnecessary and irreparable harm to DOGGR, the oil and gas industry and California consumers.

The Department of Conservation should be commended for this positive response to SB-4.

Sincerely,

A handwritten signature in black ink, appearing to read "Lynn Gray Jensen". The signature is fluid and cursive, with the first name "Lynn" being the most prominent.

Lynn Gray Jensen
Executive Director