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## Schubert, Bob J. x5183

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**From:** Steve Craig <stevecraig.turtlecreek@gmail.com>  
**Sent:** Thursday, December 21, 2017 3:26 PM  
**To:** Schubert, Bob J. x5183  
**Cc:** 100-District 3 (831) 385-8333; Mary Hsia-Coron  
**Subject:** Trio Petroleum Wells in Hames, Staff Repot

Mr. Shubert:

I would appreciate receiving notice of the next Planning Commission hearing on the proposed additional Trio wells in Hames Valley. They are drilling on the margins of Chevron's San Ardo field as the shallow heavy grade asphaltum-like deposits in San Ardo are also present in Hames (which on stratigraphy is in contact with a deep potable aquifer). Because Hames is basically a Monterey Formation, the oil is deeper than in San Ardo at Chevron, so extra methods are needed, according to DOGGR, including acid injection, to get the oil from this field as it moves southerly. There is a reason Chevron put the boundary of its field where they did; this is where the oil is close to the surface, in sandstone and Pleistocene alluvium, and is relatively easy to recover without fracking or surfactants or acid. They use steam only, generated from pockets of natural gas encountered while removing oil.

The San Ardo shallow sandstone proceeds south into Hames and dives deeper from the alluvium and sandstone transitions into the Monterey Shale in the vicinity of the alignment of Highway 101, on Porter Ranch. Several drillers, including Venoco, have tested its productivity and walked away and DOGGR is of the opinion that the deeper formation in Hames is not productive enough to warrant fracking or other types of removal. However, as oil moves forward toward \$60 a barrel, all the costs do a bit better than break even, so periodically wildcatters put in wells on the San Ardo periphery although the wells are not very productive. Question is: are such wells worth all the potential and actual impacts to visual resources, wildlife, air quality, greenhouse gas emissions, and potential contamination with potable aquifers used to support the Hames Valley Sheid growing operation, which is nearly a 1000 acre planting.

We appealed both Venoco and Trio wells in the past with Center for Biological Diversity and Los Padres Forest Watch, as well as a group of locals who came together as "Halt Oil Lease Drilling" (HOLD). This group is not currently active as we had significant federal court victories and thought the issue had gone away.

However, we think it reasonable, given the Trump Era changes, since there now have been 9 new wells placed on Porter Ranch in the past few years, and three additional pads are now proposed, I understand, though I have not yet seen the staff report recommending approval (another nine possible wells are possible).

Our questions are for the upcoming document are as follows:

1. Did the re-drilling of Venoco's wells produce commercial quantities of some grade of oil? (Dogger says the production reports were low). If so, what grade of oil was extracted from Hames, and at what depth interval?
2. Are the proposed three wells all to be placed on one pad, or are they on three separate pads?
3. At what point does testing for oil, or mop up operations on the periphery of working fields (that is Trio Petroleum's metier), constitute the approval de facto of a new field? Trio is not testing actually, they are extracting on the periphery of the boundary of a known field. There is a difference of purpose and intent between true exploration, and spot extraction. This Porter Ranch area has been tested with nine separate wells, including at least four fracked wells, in past years, before the Initiative was passed.
4. What do the County oil regs say about the threshold number of wells claimed to be test wells aggregate into a formal "field"?

5. Do the regulations discriminate between testing and marginal field extraction, which is what the Trio efforts in the past have been.

CEQA directs that a developer cannot break a long term plan into smaller pieces to avoid consideration of cumulative impacts or to disguise legal intents; therefore, the questions about when the County regs state regarding when test wells become a working field, or an adjunct extraction area for an existing field, is important and relevant. You may want to speak with the seniors in the planning division about this issue; it has come up before.

I look forward to meeting you at the next hearing.

I tried to call but got a fast busy repeatedly so perhaps the lines are congested or the phones are down on your side.

Steve Craig  
Sapaque Valley Ranch  
Citizen Planning Alliance, Bryson, California