

**350 CONEJO / SAN FERNANDO VALLEY
CENTRAL COAST ALLIANCE UNITED FOR A SUSTAINABLE ECONOMY (CAUSE)
CENTRAL COAST CLIMATE JUSTICE NETWORK
CLIMATE FIRST: REPLACING OIL & GAS (CFROG)
COMMUNITY ENVIRONMENTAL COUNCIL • CONEJO CLIMATE COALITION
ENVIRONMENTAL DEFENSE CENTER • FOOD & WATER WATCH • INDIVISIBLE VENTURA
KEEP SESPE WILD • LOS PADRES FORESTWATCH
MIXTECO/INDÍGENA COMMUNITY ORGANIZING PROJECT (MICOP)
ONE STEP A LA VEZ • PADRES JUNTOS PROMOVRIENDO LA EDUCACIÓN
RUNNERS FOR PUBLIC LANDS • SIERRA CLUB, SANTA BARBARA-VENTURA CHAPTER
VENTURA AUDUBON SOCIETY • VENTURA CLIMATE COALITION
WESTSIDE CLEAN AIR COALITION • WESTSIDE COMMUNITY COUNCIL**

May 24, 2022

Kim Prillhart, Director, Resource Management Agency
Dave Ward, Director, Planning Division
County of Ventura
800 S Victoria Ave
Ventura CA 93009

Re: Progress on 2020 Zoning Ordinance Amendments for Oil & Gas Facilities

Dear Ms. Prillhart and Mr. Ward:

On behalf of the undersigned organizations and their thousands of members in Ventura County, we are writing to respectfully request that your office proceed expeditiously with two initiatives that will protect the environment and public health and reduce the County's and taxpayer's fiscal liability stemming from oil and gas development in Ventura County.

1. On November 5, 2020, the Planning Commission directed the Resource Management Agency ("RMA") to investigate the status of abandoned and idle oil and gas wells and their regulation in Ventura County.
2. On November 11, 2020, the Board directed the RMA to return to the Board by November 2021 with a Zoning Ordinance amendment to limit discretionary oil permits to 15 years, increase the amount of compliance/site restoration surety, and incorporate measures to assure timely and permanent plugging and restoration of wells idle for 15+ years.

More than eighteen months have passed without action on these directives or a specific timeline for bringing these matters to the Planning Commission and the Board of Supervisors.

Further delays will continue to burden underserved communities and the environment. According to the most recent state data, as of January 2022, there are 2,267 idle oil and gas wells in Ventura County, 1,520 of which are considered “long-term idle wells,” meaning that they have been idle for at least eight years. At least 1,275 of these wells have been idle for 15 or more years, and 155 wells have been idle for a century or more.

The impacts that these idle wells cause are clear and well-documented including surface and drinking water contamination and air pollution. Many are located near neighborhoods, schools, farms, and waterways where air and water pollution can have a disproportionate impact on low-income communities and people of color. Many others are located in or adjacent to parks, open spaces, and wildlife habitat, including the Los Padres National Forest, Sespe Condor Sanctuary, and Hopper Mountain National Wildlife Refuge, where idle wells pose threats to recreation, clean water, and rare plants and animals.

Moreover, idle wells are known to emit methane, a climate-damaging greenhouse gas. According to the [Intergovernmental Panel on Climate Change](#), oil and gas methane emissions must be reduced by at least 30% by 2030 to avert catastrophic climate change. To help reach this goal, local governments must ensure that idle wells are appropriately remediated and emissions minimized. A [recent study](#) from the Permian Basin in Texas—the world’s largest oil production basin—found that idle wells can be a “substantial source” of methane emissions. A separate [California study](#) reached a similar conclusion. Addressing idle wells and methane emissions is consistent with the goals and strategies set forth in the County’s General Plan for climate change and greenhouse gas emissions reduction.

As noted by the Board of Supervisors, the County’s surety requirements—money that oil companies are required to set aside to pay for accidents, capping and remediation, bankruptcy, compliance, or other future expenses—are woefully outdated and place undue liability on the County and its taxpayers. According to the [California Council on Science and Technology’s assessment](#), the average cost of plugging one deserted well in southern California is approximately \$152,000. Yet under the current Coastal and Non-Coastal Zoning Ordinances, the surety bonding for oil and gas operators is “at least” \$10,000 for one well or a blanket \$10,000 for all the wells operated by any particular company in the county. This financially reckless approach means that the County’s largest oil and gas companies are operating hundreds (and sometimes thousands) of oil wells with inadequate surety bonding amounts that leave the County and taxpayers on the hook for millions of dollars.

We urge the Planning Division to proceed expeditiously with bringing these matters back to the Planning Commission and Board of Supervisors. Time is of the essence, and further delays will only perpetuate the human and environmental harm caused by idle and abandoned wells and outdated regulations.

Please keep our organizations apprised of your progress on this matter. We are eager to assist in any way possible as you work to fulfill important environmental and public health and safety directives from the Planning Commission and the Board of Supervisors.

Sincerely,

Alan Weiner
Chapter Lead
350 Conejo / San Fernando Valley

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cc:
Ventura County Board of Supervisors
Ventura County Planning Commissioners
Assemblymember Steve Bennett
Assemblymember Jacqui Irwin
Senator Monique Limón
Senator Henry Stern