

# JONES DAY

# 4

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January 15, 2014

## VIA UPS

Board of Supervisors, Santa Barbara County  
ATTN: Clerk of the Board of Supervisors, Room 407  
Information and Referral  
105 East Anapamu Street  
Santa Barbara, CA 93101



Re: Proposed Offshore Oil Production Tax

Dear Chair Lavagnino and Supervisors Adam, Carbajal, Farr and Wolf:

We are writing on behalf of our client, Venoco, Inc., to urge that you abandon any effort to include within the proposed onshore oil production tax base oil production derived from State-owned tidelands. Contrary to staff's assertion at the Board of Supervisors meeting on December 16, 2013 (the "Prior Meeting"), the tax revenue estimates from the Grand Jury report did not include State tideland oil production. There is good reason for this, as inclusion of any such oil production in the tax base will present serious jurisdictional issues that will give rise to costly litigation and probable ultimate defeat of the proposed tax.

### **Prior Tax Revenue Estimates Did Not Include County Offshore Oil Production**

It is clear from your collective reaction at the Prior Meeting that none of you had expected the proposed tax would reach County offshore oil production, and several of you were rightly concerned about the implications of going down that path. Following staff's representation that the tax revenue estimates with which you were familiar already included State tidelands oil production, you found yourselves having to wrestle with whether or not to keep the focus of the proposed tax on onshore oil production, thereby bringing in far less revenue than previously thought, or to expand the reach of the proposed tax to include State tideland oil production. Given the revenue implications and, based on staff's representation, what appeared to be the implicit acceptance of such an approach by the Grand Jury (given that the original tax estimates are contained in the Grand Jury report), you understandably directed staff to prepare optional proposed language that would include State tideland oil production within the oil production tax base.

We were as surprised as you to hear staff report that the working tax estimates included offshore oil production in State tidelands and felt compelled to check. Upon review of the Grand Jury report, we discovered that your staff is mistaken. The report focuses exclusively on onshore oil production and, in fact, expressly notes that it "does not cover offshore oil production . . . ."

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(see Grand Jury report at page 3). Further, all of the County oil production numbers cited in the report—which serve as the basis for all discussion to-date regarding the anticipated revenue from the adoption of an oil production tax—relate exclusively to onshore County production. No portion of the revenue estimates from the Grand Jury report relate in any way to oil production from the State tidelands.

The Grand Jury report identifies County oil production in each of 1964 (8,950,404 barrels), 2005 (1,913,093 barrels ) and 2012 (3,388,668 barrels); numbers the report claims to have obtained from the Department of Conservation’s Division of Oil, Gas, and Geothermal Resources (DOGGR). Using the oil production information found on the DOGGR website ([www.conservation.ca.gov](http://www.conservation.ca.gov), “Online Production and Injection”), we discovered that Santa Barbara County’s reported onshore oil production in 2005 was 1,913,940 barrels (a figure consistent with the 1,913,093 barrels noted in the Grand Jury report), while Santa Barbara offshore oil production (i.e., that extracted from wells in State tidelands) the same year was an additional 1,041,438 barrels. See Exhibit A. Similarly, the DOGGR website reports that Santa Barbara County onshore oil production in 2012 was 3,421,949 barrels (again, a number generally consistent with the 3,388,668 barrels noted in the Grand Jury report), while an additional 1,171,615 barrels of oil were extracted in State tidelands offshore Santa Barbara County. See Exhibit A see also Exhibit B (reporting total Santa Barbara County oil production in 2012 was 4,595,018 barrels; an amount equal to the sum of County onshore production (3,421,949 barrels) and County offshore oil production in State tidelands (1,171,615 barrels)).

### **Inclusion of County Offshore Oil Production in Tax Base Would Present Serious Jurisdictional Issues**

Staff’s recommended inclusion of County offshore oil production in the proposed tax base should be rejected, not only because it is beyond the scope of that intended by the Grand Jury, but more importantly because it needlessly subjects the proposed tax, if adopted by the voters, to certain litigation and probable defeat, as it amounts to improper County meddling in oil leasing activities that are within the exclusive jurisdiction of the State Lands Commission.

Section 6871 of the California Public Resources Code expressly provides:

*No political subdivision of the State or any city or **county** or any official of either or any of them **shall grant or issue any** lease, **license**, easement, **privilege**, or permit **vesting authority in any person to take or extract oil or gas from tide or submerged lands** whether filled or unfilled **of which the State is the owner** or from which the State has the right to extract oil or gas, or both.*

*(emphasis added).*

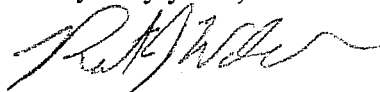
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A business license tax operates to confer a license or privilege to a person to conduct business activities in a jurisdiction so long as that person pays the requisite tax. Here, the proposed business license tax would impose as a condition precedent to an oil producer's conduct of State oil leasing activities the obtainment of a County business license, a privilege granted by the County upon payment of the business license tax. But, to impose its business license tax on State oil leasing activities, Santa Barbara County will have to establish that it has concurrent jurisdiction over these activities—a tough road in light of the Submerged Lands Act of 1953 (granting ownership of the tidelands to the states) and sections 6216(a)&(b) of the California Public Resources Code which expressly and unequivocally reserve in the State Lands Commission exclusive jurisdiction over all oil leasing activities in the tidelands and in no uncertain terms prohibit a County from granting or issuing any license or privilege vesting authority in any person to take or extract oil or gas from State tidelands.

Even assuming *arguendo* that the County were allowed to impose a business license tax on oil production activities in State tidelands, any tax revenue received by the County from such activities would be subject to the public trust doctrine, thus limiting how such revenue may be used.

We suspect the Grand Jury limited its recommendation to onshore oil production because it properly recognized the State's exclusive jurisdiction over oil production activities in State tidelands. Should you decide to move forward with an oil production tax proposal, we strongly urge that you follow the lead of the Grand Jury and reject staff's recommendation that you expand the scope of the proposed onshore oil production tax to reach oil production activities over which the State Lands Commission has exclusive jurisdiction.

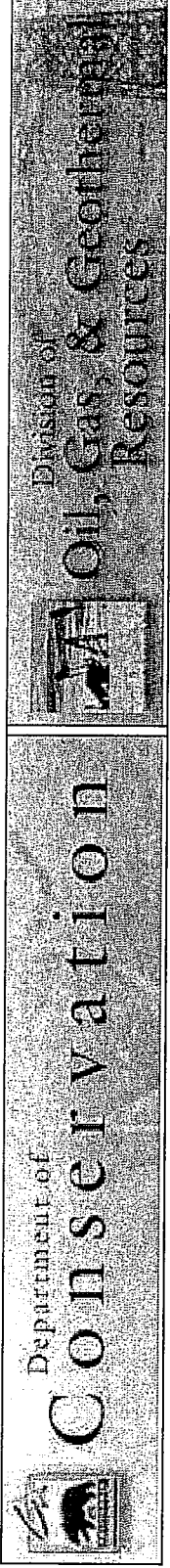
Very truly yours,



Robert J. Waldow

**EXHIBIT A**

**OIL PRODUCTION TABLES**



Online WellRecord Query for State of California, Department of Conservation, Division of Oil, Gas, and Geothermal Resources.

- Monterey [053]
- San Luis Obispo [079]
- SAN MIGUEL ISLA [220]
- Santa Barbara [083]
- SANTA BARBARA O [283]
- Santa Clara [085]
- Santa Cruz [087]
- SANTA CRUZ ISLA [128]
- SANTA CRUZ ISLA [228]
- SANTA ROSA ISLA [130]
- SANTA ROSA ISLA [230]

Field

Operator

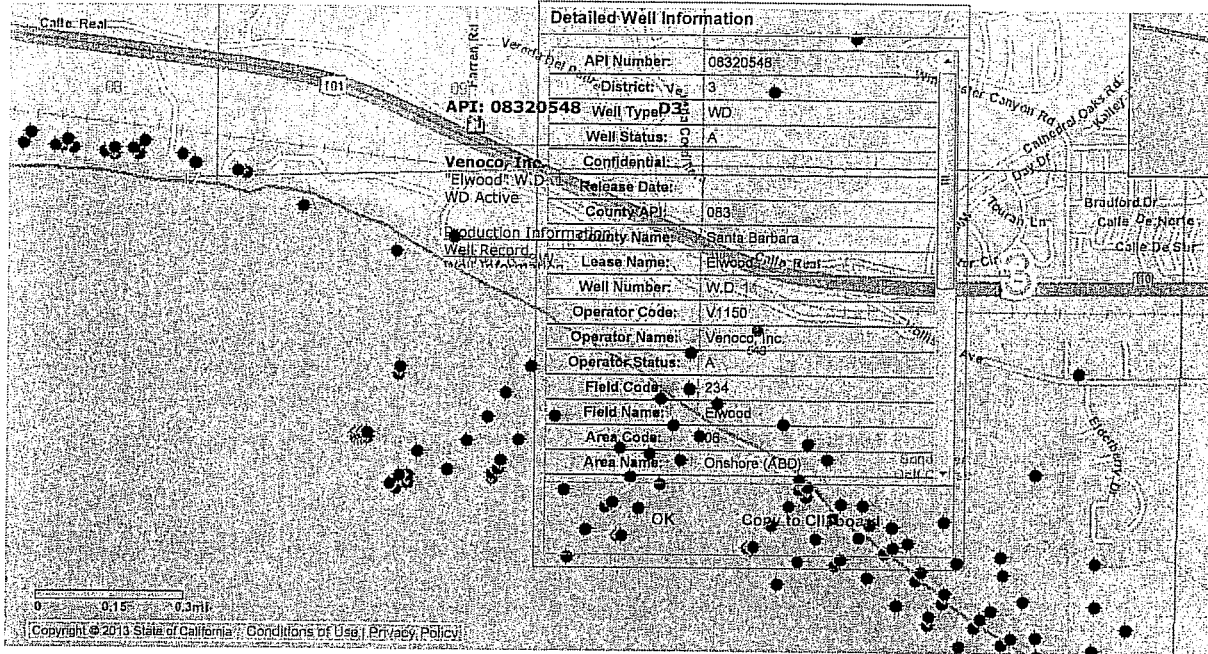
Lease

Get Wells

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**Detailed Well Information**

API Number:	28320271
District:	3
Well Type:	OC
Well Status:	Miller
Confidential:	
Release Date:	
County API:	283
County Name:	SANTA BARBARA OFFSHORE
FJ Lease Name:	AMES 3242
Well Number:	10
Operator Name:	Venoco, Inc.
OG Operator Name:	Venoco, Inc.
Operator Status:	A
Production Information:	
Well Ref ID Code:	236
Well Name:	Elwood, South Offshore
Area Code:	06
Area Name:	Main

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**TAB 1**



**DOGGR'S REPORT OF OIL PRODUCTION  
SANTA BARBARA COUNTY ONSHORE  
(COUNTY API: 083)**

Number of Well Types: 6,092 Well Types Having Production: 4,091 Well Types Having Injection: 1,773

County:  ← Santa Barbara County [083]

Date	Oil (bbl)	Water (bbl)	Gas (Mcf)	Days
12/2013	0	0	0	0
11/2013	17,608	290,208	961,121	3,404
10/2013	167,162	5,543,766	306,676	18,833
09/2013	267,588	6,796,542	192,423	24,696
08/2013	394,672	9,749,823	281,675	31,262
07/2013	375,202	9,699,857	418,465	30,593
06/2013	340,773	8,976,088	292,566	29,556
05/2013	349,925	9,212,522	275,412	28,728
04/2013	335,443	8,865,772	310,255	28,471
03/2013	338,048	8,896,896	510,501	29,724
02/2013	295,169	7,902,405	1,613,405	27,832
01/2013	314,177	8,514,798	5,245,625	30,407
<b>Total 2013</b>	<b>3,195,767</b>	<b>84,448,677</b>	<b>10,408,124</b>	<b>283,506</b>
12/2012	312,996	8,670,532	3,164,904	29,898
11/2012	301,645	8,542,978	685,387	29,052
10/2012	296,198	8,448,158	230,071	29,154
09/2012	291,877	8,190,621	235,820	27,803
08/2012	301,258	8,743,617	259,244	28,748
07/2012	284,253	8,499,407	199,548	28,133
06/2012	269,921	8,143,545	204,566	26,934
05/2012	283,358	8,276,246	266,747	27,586
04/2012	280,138	8,028,442	214,109	26,293
03/2012	269,697	7,777,570	363,045	26,808
02/2012	255,846	7,524,182	631,805	26,380
01/2012	274,762	8,235,896	1,996,662	28,391
<b>Total 2012</b>	<b>2,712,343</b>	<b>99,681,192</b>	<b>8,451,908</b>	<b>335,180</b>
12/2011	271,606	8,138,763	4,552,496	27,780
11/2011	255,977	7,942,176	919,104	26,601
10/2011	260,194	9,826,034	539,177	27,097
09/2011	236,322	7,139,738	211,681	25,689
08/2011	248,949	7,950,921	265,276	26,882
07/2011	254,492	7,709,745	234,524	26,983
06/2011	238,413	7,267,470	200,165	26,093
05/2011	234,134	5,963,390	204,304	25,908
04/2011	230,006	7,011,313	197,927	24,201
03/2011	226,019	7,081,144	973,758	24,649
02/2011	185,158	5,695,413	3,625,830	21,947
01/2011	203,452	6,058,516	4,654,653	22,782
<b>Total 2011</b>	<b>2,844,722</b>	<b>87,784,623</b>	<b>16,572,895</b>	<b>306,612</b>
12/2010	211,217	6,864,948	3,146,473	24,437
11/2010	211,033	6,532,954	2,327,152	23,568
10/2010	218,562	6,652,017	183,759	24,089
09/2010	213,234	6,732,461	465,411	23,289
08/2010	207,648	6,314,921	591,906	26,006
07/2010	209,532	6,372,569	283,446	23,804
06/2010	201,720	6,390,421	258,329	23,260
05/2010	217,665	6,625,270	172,833	24,104
04/2010	214,215	6,387,043	170,235	23,151
03/2010	213,083	6,603,257	301,996	24,033
02/2010	201,276	5,897,947	581,888	21,441
01/2010	215,939	6,539,890	2,426,856	23,636
<b>Total 2010</b>	<b>2,535,124</b>	<b>77,913,698</b>	<b>10,910,284</b>	<b>281,818</b>
12/2009	228,020	6,416,310	6,452,819	24,132
11/2009	214,433	6,185,787	867,144	22,845
10/2009	218,995	6,387,267	271,199	23,295
09/2009	215,513	6,280,709	289,834	22,368
08/2009	225,983	6,461,056	139,155	22,783
07/2009	221,158	6,386,896	1,891,923	23,325

06/2009	222,008	6,287,532	216,662	22,375
05/2009	216,994	6,095,718	158,990	22,125
04/2009	204,396	6,068,880	137,355	21,217
03/2009	220,815	6,317,063	486,884	22,313
02/2009	190,031	5,528,435	802,839	20,192
01/2009	207,511	6,251,828	2,076,113	19,995
<b>Total 2009</b>	<b>2,585,857</b>	<b>74,667,480</b>	<b>13,790,917</b>	<b>266,965</b>
12/2008	224,606	6,147,657	5,301,443	22,798
11/2008	191,431	5,841,475	192,273	21,847
10/2008	196,850	5,956,131	878,625	22,664
09/2008	185,990	5,916,682	297,391	21,944
08/2008	194,208	6,039,149	241,829	22,617
07/2008	172,017	5,205,915	175,422	22,573
06/2008	162,584	5,114,601	170,271	21,458
05/2008	159,849	5,554,204	188,170	22,044
04/2008	147,995	5,044,031	182,672	21,651
03/2008	151,061	5,210,268	368,964	22,267
02/2008	142,948	4,803,883	4,632,839	19,983
01/2008	154,425	5,209,012	5,750,182	21,428
<b>Total 2008</b>	<b>2,083,964</b>	<b>66,043,008</b>	<b>18,680,081</b>	<b>263,269</b>
12/2007	169,742	5,605,770	5,182,720	21,700
11/2007	169,109	5,841,861	949,621	20,909
10/2007	172,347	5,650,076	465,503	21,633
09/2007	170,911	5,416,457	165,265	20,963
08/2007	182,168	5,783,931	693,366	21,425
07/2007	176,283	5,653,617	166,049	20,101
06/2007	167,571	5,784,541	156,588	19,944
05/2007	179,712	5,995,788	204,584	20,354
04/2007	164,646	5,685,283	155,589	19,277
03/2007	170,690	5,723,379	490,334	18,214
02/2007	153,825	5,197,638	3,957,464	17,017
01/2007	177,489	5,710,978	5,746,174	19,019
<b>Total 2007</b>	<b>2,054,498</b>	<b>68,049,809</b>	<b>18,338,257</b>	<b>240,556</b>
12/2006	163,207	5,624,971	3,739,426	18,668
11/2006	175,614	5,679,411	1,050,605	18,720
10/2006	180,993	5,677,555	440,647	18,517
09/2006	177,875	5,698,154	190,459	18,228
08/2006	187,526	5,806,897	174,538	18,920
07/2006	176,839	5,795,103	167,360	18,575
06/2006	169,940	5,694,752	165,981	17,999
05/2006	177,734	5,594,681	148,750	17,912
04/2006	156,442	5,103,649	362,615	17,153
03/2006	152,593	5,100,665	1,649,951	17,860
02/2006	139,710	4,405,929	1,999,985	16,086
01/2006	145,481	4,493,854	3,254,764	17,483
<b>Total 2006</b>	<b>2,003,954</b>	<b>64,675,621</b>	<b>18,345,081</b>	<b>216,021</b>
12/2005	147,720	4,647,448	3,606,408	17,480
11/2005	151,664	4,730,958	874,699	17,684
10/2005	148,986	4,994,010	148,189	17,688
09/2005	160,019	4,974,981	398,555	17,306
08/2005	164,344	5,332,188	420,328	18,173
07/2005	165,594	5,232,671	162,727	17,955
06/2005	159,709	5,126,114	183,339	17,291
05/2005	169,924	5,607,935	225,341	17,929
04/2005	166,416	5,659,188	184,073	18,132
03/2005	169,927	5,555,883	1,960,057	18,829
02/2005	146,147	4,986,592	1,935,037	16,755
01/2005	163,490	5,146,533	4,371,866	18,542
<b>Total 2005</b>	<b>1,913,940</b>	<b>61,994,501</b>	<b>14,470,619</b>	<b>213,714</b>
12/2004	182,513	5,523,843	2,548,082	18,828
11/2004	160,290	5,192,832	2,160,050	18,201
10/2004	158,297	5,285,407	268,469	17,897
09/2004	157,970	5,269,849	179,658	18,040
08/2004	175,606	5,430,181	177,236	18,763

**TAB 2**

**DOGGR'S REPORT OF OIL PRODUCTION  
SANTA BARBARA COUNTY OFFSHORE  
(COUNTY API: 283)**

Number of Well Types: 401 Well Types Having Production: 286 Well Types Having Injection: 31

County:  *← Santa Barbara County Offshore [283]*

Date	Oil(bbl)	Water(bbl)	Gas (Mcf)	Days
11/2013	136,727	503,888	117,228	539
10/2013	110,239	376,037	101,740	426
09/2013	125,029	479,455	91,369	498
08/2013	151,732	531,626	131,117	537
07/2013	164,211	521,521	97,646	517
06/2013	153,891	469,195	69,500	480
05/2013	168,268	490,961	76,118	496
04/2013	162,015	486,546	78,536	480
03/2013	175,936	504,448	89,337	496
02/2013	120,698	458,374	74,799	431
01/2013	126,508	499,366	87,883	465
<b>Total 2013</b>	<b>1,595,254</b>	<b>5,821,417</b>	<b>1,015,273</b>	<b>5,365</b>
12/2012	129,216	491,951	85,462	465
11/2012	89,058	378,994	45,903	381
10/2012	120,738	509,768	66,055	473
09/2012	128,372	499,925	76,952	458
08/2012	138,962	510,070	79,118	487
07/2012	129,627	514,377	59,607	496
06/2012	88,681	501,959	55,091	462
05/2012	70,770	510,882	58,712	455
04/2012	65,877	475,290	53,709	429
03/2012	73,930	495,287	80,641	455
02/2012	65,371	490,948	59,906	440
01/2012	71,015	513,530	64,207	416
<b>Total 2012</b>	<b>1,471,612</b>	<b>5,892,985</b>	<b>788,363</b>	<b>5,277</b>
12/2011	70,711	505,196	56,474	444
11/2011	68,463	510,875	45,994	441
10/2011	63,472	485,169	64,444	435
09/2011	59,245	461,578	24,534	396
08/2011	71,073	485,193	53,700	435
07/2011	45,206	330,530	44,163	329
06/2011	72,266	449,671	62,352	451
05/2011	76,144	477,881	71,027	453
04/2011	69,550	456,081	66,272	406
03/2011	70,042	498,992	75,453	392
02/2011	61,282	448,295	86,343	394
01/2011	70,483	497,693	87,507	462
<b>Total 2011</b>	<b>797,937</b>	<b>5,607,154</b>	<b>738,763</b>	<b>5,010</b>
12/2010	71,661	520,429	53,950	442
11/2010	70,561	492,501	53,033	432
10/2010	72,142	487,989	55,831	452
09/2010	76,522	498,334	57,086	433
08/2010	76,217	516,000	62,613	437
07/2010	70,353	512,069	66,863	479
06/2010	45,793	279,524	41,036	327
05/2010	81,048	510,878	33,437	552
04/2010	76,125	500,079	30,683	509
03/2010	78,273	490,980	41,908	511
02/2010	70,196	414,560	78,286	375
01/2010	81,775	501,418	44,682	494
<b>Total 2010</b>	<b>870,666</b>	<b>5,724,761</b>	<b>619,408</b>	<b>5,444</b>
12/2009	77,440	498,512	40,585	505
11/2009	78,496	497,928	53,262	480
10/2009	83,186	506,836	56,992	483
09/2009	78,270	483,983	47,629	440
08/2009	77,428	503,425	29,009	417
07/2009	54,079	338,495	11,776	314
06/2009	77,037	464,617	50,353	462

05/2009	80,825	442,167	33,879	460
04/2009	80,226	423,710	36,802	468
03/2009	79,991	445,237	45,173	486
02/2009	64,888	293,140	40,853	429
01/2009	89,810	412,548	56,400	500
<b>Total 2009</b>	<b>921,676</b>	<b>5,310,598</b>	<b>502,715</b>	<b>5,144</b>
12/2008	93,397	416,400	71,643	498
11/2008	84,602	396,950	59,793	477
10/2008	73,316	322,617	48,885	416
09/2008	34,354	217,362	20,470	229
08/2008	79,630	404,557	68,744	519
07/2008	85,316	415,966	74,964	520
06/2008	43,451	216,614	43,941	305
05/2008	91,405	439,291	91,505	546
04/2008	87,548	449,450	94,041	547
03/2008	86,182	443,973	79,191	582
02/2008	77,032	384,652	65,823	500
01/2008	93,738	434,115	87,628	555
<b>Total 2008</b>	<b>929,971</b>	<b>4,541,947</b>	<b>806,628</b>	<b>5,694</b>
12/2007	95,359	438,938	87,920	541
11/2007	77,664	379,498	69,584	464
10/2007	95,050	437,639	96,812	525
09/2007	86,486	423,212	90,147	491
08/2007	92,343	409,274	99,348	503
07/2007	96,901	424,419	95,272	541
06/2007	100,407	448,099	116,991	570
05/2007	106,785	452,008	133,878	517
04/2007	105,289	434,878	145,925	518
03/2007	61,618	281,107	86,188	322
02/2007	97,828	387,485	149,131	495
01/2007	114,754	437,347	169,534	601
<b>Total 2007</b>	<b>1,130,484</b>	<b>4,958,307</b>	<b>1,340,780</b>	<b>6,088</b>
12/2006	113,207	464,131	170,842	565
11/2006	78,381	288,294	165,459	377
10/2006	83,055	305,788	209,876	466
09/2006	107,438	371,359	171,320	549
08/2006	28,150	128,848	51,676	222
07/2006	98,273	376,289	188,196	605
06/2006	109,385	378,449	160,270	593
05/2006	97,098	411,414	145,643	557
04/2006	98,224	354,474	160,091	519
03/2006	103,361	336,032	169,819	424
02/2006	92,670	309,799	145,829	456
01/2006	101,669	321,470	162,490	448
<b>Total 2006</b>	<b>1,110,911</b>	<b>4,046,347</b>	<b>1,901,515</b>	<b>5,781</b>
12/2005	111,232	321,619	175,581	392
11/2005	104,166	294,805	153,517	341
10/2005	59,100	204,551	119,142	273
09/2005	63,040	228,517	148,229	257
08/2005	63,205	226,461	149,327	394
07/2005	79,775	266,182	200,397	396
06/2005	67,381	275,246	173,356	389
05/2005	75,779	287,857	185,095	474
04/2005	110,328	294,224	195,189	446
03/2005	105,936	276,712	195,123	430
02/2005	88,122	222,654	167,998	349
01/2005	113,374	267,849	198,893	463
<b>Total 2005</b>	<b>1,041,438</b>	<b>3,166,677</b>	<b>2,061,837</b>	<b>4,604</b>
12/2004	108,956	274,588	191,526	414
11/2004	108,372	262,985	169,768	438
10/2004	128,655	311,096	168,549	504
09/2004	107,591	267,564	152,113	433
08/2004	90,657	287,873	168,455	441
07/2004	101,840	296,095	156,679	507

**EXHIBIT B**



**WELL COUNTS AND PRODUCTION OF OIL, GAS,  
AND WATER BY COUNTY - 2012**

County	Well Count *		Oil Production (bbl) **	Net Gas Production			Water Production (bbl)
	Active	Inactive		Associated Gas (Mcf)	Nonassociated Gas (Mcf)	Total Gas (Mcf)	
Alameda.	6	1	14,601	0	0	0	46,052
Butte.	26	1	0	0	51,839	51,839	420
Colusa	225	129	0	0	9,886,381	9,886,381	104,561
Contra Costa	45	17	454	0	843,518	843,518	8,764
Fresno	1,946	1,571	5,992,763	714,642	357	714,999	66,040,632
Glenn.	259	60	0	0	8,521,530	8,521,530	80,390
Humboldt	26	29	0	0	638,124	638,124	7,420
Kern	42,875	15,803	141,481,290	160,638,575	2,904,518	163,543,093	1,828,374,391
Kings	175	188	137,127	190,197	153,748	343,945	908,558
Los Angeles	3,690	1,552	24,130,729	18,275,394	241,297	18,516,691	798,857,241
Madera	23	18	0	0	967,873	967,873	1,656
Merced	0	3	0	0	0	0	0
Monterey	657	562	7,433,840	1,204,142	0	1,204,142	116,288,726
Orange	1,041	464	4,383,546	2,006,620	0	2,006,620	79,058,939
Sacramento	112	100	21,085	0	8,796,121	8,796,121	141,912
San Benito	18	23	5,007	46,929	7,155	54,084	1,669
San Bernardino	20	18	10,595	111	0	111	2,671
San Joaquin	157	94	184	0	2,970,015	2,970,015	67,689
San Luis Obispo	120	228	414,582	858,768	0	858,768	7,241,378
San Mateo	10	13	1,294	4,675	0	4,675	2,561
Santa Barbara	1,170	1,042	4,595,018	3,274,524	101	3,274,625	105,330,847
Santa Clara	13	2	40,006	39,598	0	39,598	24,765
Solano	126	148	9,932	0	4,796,836	4,796,836	89,955
Stanislaus	2	0	0	0	616,623	616,623	32,201
Sutter	289	130	0	0	10,499,715	10,499,715	114,525
Tehama	111	39	0	0	1,727,083	1,727,083	16,436
Tulare	75	20	48,142	0	0	0	3,954,749
Ventura	1,743	1,263	8,977,459	8,411,316	8,411,316	16,822,632	66,299,114
Yolo	25	56	578	0	229,860	229,860	2,314
Yuba	1	0	0	0	1,006	1,006	0
<b>TOTAL</b>	<b>54,986</b>	<b>23,574</b>	<b>197,698,232</b>	<b>195,665,491</b>	<b>62,265,016</b>	<b>257,930,507</b>	<b>3,073,100,536</b>

\* includes well count from Oil & Gas (OG), Dry Gas (DG) and Gas Storage (GS)

\*\* Includes condensate produced from from Dry Gas (DG) and Gas Storage (GS)