

#2

Ramirez, Angelica

Public Comment

From: Haley Ehlers <haley@cfrog.org>
Sent: Friday, May 20, 2022 10:38 AM
To: sbcob
Cc: Executive Director Cfrog
Subject: Agenda Item #2 Comment
Attachments: CFROG_BOS SB_GJ Idle Well Report_052022.pdf



Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

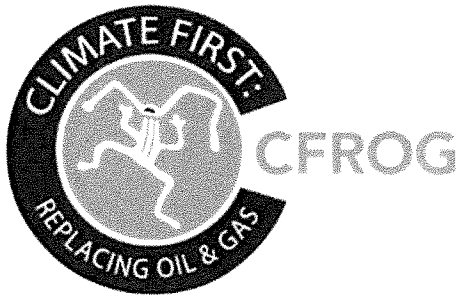
Hello,

Please find a comment letter from Climate First: Replacing Oil & Gas for Agenda Item #2 on 05/24/22 Board of Supervisor meeting attached.

Thank you,
Haley

--

Haley Ehlers, Program Manager
Climate First: Replacing Oil and Gas
Peace Corps Fellow - Illinois State University
(805)794-0629
www.CFROG.org



May 20, 2022

Board of Supervisors
County of Santa Barbara
105 E Anapamu Street
Santa Barbara, CA 93101

Sent via email sbcob@co.santa-barbara.ca.us

Re: Agenda Item #2: Protect Community Health, Climate, and Environment by Investigating and Monitoring Idle Oil Wells

Dear Supervisors,

Climate First: Replacing Oil & Gas (CFROG) is a grassroots environmental nonprofit dedicated to combating the climate crisis by working to shape the transition from fossil fuels to a carbon-free economy on the Central Coast. We operate as a watchdog organization dedicated to ensuring that oil and gas operations in the area are properly reviewed, permitted, monitored, and compliant with relevant environmental and safety laws and regulations. **CFROG strongly supports the request to direct staff to investigate the status and regulation of idle and orphan wells and provide regular annual reports at public hearings.**

The recent Santa Barbara County Grand Jury report confirms what environmental groups have suspected for years - the County and State are utterly unprepared and lacking the necessary resources to address the idle and orphan well problem. With 1,370 idle wells, Santa Barbara has more idle wells than active wells - and the problem will only continue to grow as conventional oil resources are depleted and California phases out fossil fuel extraction.

Reduce Greenhouse Gas Emissions and Protect the Air Communities Breathe

Unplugged idle and orphan wells pose serious air pollution concerns. First, these wells leak methane, the principal component of natural gas and a greenhouse gas (GHG) with very high atmospheric warming potential: 28-34 times that of carbon dioxide over 100 years and 84-86 times over 20 years. In their latest report, the Intergovernmental Panel on Climate Changeⁱ found methane levels in the air are higher now than at any point in the past 800,000 years and called for "strong, rapid and sustained reductions" in methane emissions. A recent study estimates that two-thirds of idle wells in California are leaking methane.ⁱⁱ Proper assessment, monitoring, and eventual capping of these wells is a common-sense

practice toward achieving Santa Barbara County's goal of carbon neutrality by 2035.

Second, and more imminent, air pollution from these wells can pose a serious risk to human health and safety. When concentrated, methane can create a serious explosion and fire hazard.ⁱⁱⁱ Additionally, it can contaminate groundwater, worsen air quality by oxidizing to create ozone pollution,^{iv} and may also be accompanied by the release of other toxic chemicals, like volatile organic compounds (VOCs).^v Chronic exposure to VOCs, like benzene and toluene, and other air pollutants from wells can lead to upper respiratory tract irritation, dizziness, sore throat, headaches, asthma, cardiovascular effects, and cancer.^{vi}

Just this week in Bakersfield, the local Air Pollution Control District confirmed that two idled oil wells, located just 370 feet away from homes, are leaking massive volumes of methane.^{vii} One well was measured at a minimum of 50,000 parts per million (ppm), the maximum level the inspector's device could record, and another nearby was leaking methane at or over 20,000 ppm. Thanks to a lack of monitoring, it is unclear how long the wells have been leaking but records show they have been idle since the 1980s.

Protect Taxpayers from Cleaning Up Oil Industry Legacy

Idle and orphan wells can pose serious threats to the surrounding environment and communities. But the threat does not stop there - the cleanup costs are substantial, and if not seriously considered and planned for, the bill will end up in the wrong place, addressed to the taxpayers. The California Council on Science and Technology estimates that the average cost to plug an onshore well is \$68,000, and may be much higher.^{viii} But California's major oil companies have state bonds as low as \$80 per well,^{ix} which is evidently not enough to serve as a true financial assurance that the operator will cover its legal obligations to pay for the cost of plugging and remediation. While the state is receiving significant funds from the federal government^x and has set aside state monies^{xi} to begin to address the orphan well issue, without localized prioritization, it is not likely Santa Barbara County will receive much attention.^{xii}

A first step in ensuring oil operators are held accountable to their legal obligations of cleanup is sufficient monitoring and thoughtful tracking. Research finds that the likelihood of an idle well being reactivated decreases the longer it remains idle.^{xiii} As oil and gas production continues to decrease, Santa Barbara County should be more vigilant in the abandonment of idle wells. Additionally, the County should recognize that the problem does not stop there. With over 4,000 aging-in-place abandoned wells, there is likely a significant inventory of poorly plugged wells that will need repair and possible re-abandonment in the years to come.

We demand the Board of Supervisors direct staff to fully investigate the status and regulation of idle and orphaned wells and provide regular annual reports at public hearings including:

- An inventory of the number and status of oil wells in the County including active, idle, orphaned, and abandoned wells, and the length of time wells have been sitting idle
- All fluid and methane leaks, seeps, noncompliance, violations, and other problems from idle and orphaned wells

- All interagency coordination and actions taken by County Planning and Development, Air Pollution Control District (APCD), County Fire, CalGEM, and State Water Board
- All County, APCD, state, and federal ordinances, regulations, inspections, and enforcement programs that regulate idle wells
- All readily available local and state information regarding problems with idle, orphaned, and abandoned oil and gas wells in the County
- An investigation as to whether bonding is adequate to cover well capping and drill site restoration

Ventura County Board of Supervisors tasked staff with conducting and presenting a similar annual report in late 2020. Santa Barbara County should be motivated by this regional trend, the Grand Jury findings, and the protection of community health and safety to make similar recommendations. To ensure this reporting is done promptly, **Supervisors should require regular progress reports and have a set date of presentation, distribution, and public hearing.**

With urgency,
Climate First: Replacing Oil & Gas (CFROG)

ⁱ IPCC. (2021). Summary for policymakers. In: *Climate change 2021: The physical science basis. Contribution of working group 1 to the Sixth Assessment Report of the Intergovernmental Panel of Climate Change*. [Masson-Delmotte, V. P. et al., (Eds.)]. Cambridge University Press.

ⁱⁱ Lebel et al. (2020). Methane emissions from abandoned oil and gas wells in California. *Environmental Science & Technology*, 52(22), 14617-14626.

ⁱⁱⁱ Chilingard, G. V. & Endres, B. (2005) Environmental hazards posed by the Los Angeles Basin urban oilfields: An historical perspective of lessons learned. *Environmental Geology*, 47, 302-217.

^{iv} West, J. J. & Fiore, A. M. (2005). Management of tropospheric ozone by reducing methane emissions. *Environmental Science Technology*, 39, 4685-4691.

^v Raimi et al. (2021). Decommissioning orphaned and abandoned oil and gas wells: New estimates and cost drivers. *Environmental Science Technology*, 55(15), 10224-10230.

^{vi} Macey et al. (2014). Air concentrations of volatile compounds near oil and gas production: A community-based exploratory study. *Environmental Health*, 13(82).

^{vii} Caplan et al. (2022, May 19). Oil wells leaking dangerous amounts of methane found in northeast Bakersfield near homes and elementary school. *Sierra Club*. <https://www.sierraclub.org/press-releases/2022/05/oil-wells-leaking-dangerous-amounts-methane-found-northeast-bakersfield-near>

^{viii} CCST (2018). Orphan wells in California: An initial assessment of the state's potential liabilities to plug and decommission orphan oil and gas wells. <https://ccst.us/wp-content/uploads/CCST-Orphan-Wells-in-California-An-Initial-Assessment.pdf>

^{ix} Kretzmann, K. (2020, October 21). Undercover risks: How big oil's 'blanket bonds' jeopardize the environment and state budgets. *Center for Biological Diversity*.

^x U.S. Department of the interior (2022, January 31). Biden Administration announces \$1.15 billion for states to create jobs cleaning up orphaned oil and gas wells. <https://www.doi.gov/pressreleases/biden-administration-announces-115-billion-states-create-jobs-cleaning-orphaned-oil>

^{xi} Legislative Analyst's Office (2022). The 2022-23 budget: Oil well abandonment and remediation. <https://lao.ca.gov/Publications/Report/4508>

^{xii} Due to CalGEM's prioritization of orphan wells in environmental justice communities and urban oilfields

^{xiii} CCST (2018). Orphan wells in California: An initial assessment of the state's potential liabilities to plug and decommission orphan oil and gas wells. <https://ccst.us/wp-content/uploads/CCST-Orphan-Wells-in-California-An-Initial-Assessment.pdf>