



*California Independent Petroleum Association*  
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November 7, 2011

Santa Barbara County Planning Commission  
Attn: Doug Anthony  
SBC Energy Division  
123 East Anapamu Street  
Santa Barbara, CA 93101-2058

Dear Mr. Anthony:

On behalf of the California Independent Petroleum Association (CIPA), I am submitting comments on the **Staff Report for Identifying Permit Processes for Hydraulic Fracturing of Any New or Existing Oil/Gas Wells**, Case Nos.: 11ORD-00000-00022 & 11ORD-00000-0002.

CIPA represents over 150 independent operators statewide who drill and produce oil and natural gas in California on a daily basis. Our membership operates thousands of wells across the state that requires constant upkeep with multiple techniques to keep oil and gas flowing. Adding additional requirements sought in this ordinance will do nothing to protect groundwater. Multiple studies over the last 40 years have shown hydraulic fracturing to be a safe and effective technique utilized to stimulate production in tight rock formations that would otherwise be un-economic.

There is a presumption that the existing regulatory framework as regulated by the California Division of Oil, Gas and Geothermal Resources (DOGGR) is inadequate. As part of the completion of a well, groundwater is protected by a very stringent set of regulations that do not allow migration of water into groundwater aquifers no matter what completion technique is applied on a well.

The underlying assumption as to the riskiness of hydraulic fracturing is unwarranted. In Attachment B, citing CEQA Guidelines, the argument is made that full CEQA review is necessary in order to avoid significant effects. The assumption that there is a "reasonable possibility" of potential significant effects from hydraulic fracturing is readily refutable by some of the very sources quoted by hydraulic fracturing opponents, specifically the Duke study.

The concept of full disclosure of hydraulic fluids in proposed legislation, AB 591, is supported by CIPA and our members. Companies performing hydraulic fracturing in California have agreed to disclose fluids used in the hydraulic fracturing process through a database currently being developed by the Groundwater Protection Council and the Interstate Oil and Gas Compact Commission ([fracfocus.org](http://fracfocus.org)). This is a nationwide effort to relieve concerns people might have on a production technique that have been proven safe for decades.

The language offered in the draft ordinance is overly broad so as not appear to adequately restrict the issues the county may appropriately consider in reviewing hydraulic fracturing applications. The report identifies "geology" and "water resources", which could include an infinite range of issues, not just an unapproved use of groundwater in an overdrafted basin.

Please identify which of SBC's groundwater basins are adjudicated. In specific circumstances the adjudication could take care of the unapproved water use issue.

The county has not adequately considered the fiscal impacts of restricting hydraulic fracturing completion techniques, due to increased regulation, cost and delay making some projects un-economic. Oil assessment revenues paid by oil producers through an ad-valorem property tax will diminish, forcing the County to look elsewhere to make up for their worsening revenue deficiencies.

Thank you for your consideration and the opportunity to comment on this important matter. Please feel free to contact me if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Blair Knox".

**Blair Knox**  
Director of Public Affairs