

From: "O'Gorman, Mary" <mogorman@countyofsb.org>
Date: March 14, 2017 at 7:39:55 AM PDT
To: "Miyasato, Mona" <mmiyasato@countyofsb.org>, "Pontes, Matthew" <mpontes@countyofsb.org>
Cc: "Allen, Michael (COB)" <allen@co.santa-barbara.ca.us>
Subject: Fwd: APCD Notice of Violations Issued to ERG

Hi, we received this after hours, Janet wanted to make sure it's part of the record as she will likely reference it tomorrow.

Thanks
Mary

Sent from my iPhone

Begin forwarded message:

From: "Cantle, Peter" <pcantle@co.santa-barbara.ca.us>
Date: March 13, 2017 at 5:52:16 PM PDT
To: "Wolf, Janet" <jwolf@countyofsb.org>, "O'Gorman, Mary" <mogorman@countyofsb.org>
Cc: "Black, Dianne" <Dianne@co.santa-barbara.ca.us>, "Peterson, Eric" <Eric.Peterson@sbcfire.com>, "Ghizzoni, Michael" <Mghizzoni@co.santa-barbara.ca.us>, "Pell, Janette" <jpell@co.santa-barbara.ca.us>
Subject: RE: APCD Notice of Violations Issued to ERG

Supervisor Wolf and Mary,

As a general summary of ERG's compliance status, as shown in the attached document, our petroleum inspectors logged multiple Petroleum Code violations of different kinds in 2011 (21) and 2012 (20), which coincided with ERG's reactivating parts of the Cat Canyon field and changing out and upgrading old/existing equipment. The violations that were documented were generally addressed quickly and satisfactorily by ERG and closed out by Petroleum staff. The number of violations diminished considerably in 2013 (4), 2014 (3) and 2015 (1), as improved field operations and new equipment began to take effect. Since October 2015, no Petroleum Ordinance violations have been documented.

Our inspectors' general sense of ERG as an operator is that they are cooperative, attentive and responsive, and work to stay on top of their operations.

I noticed that the material from the APCD was cc'd to the Clerk of the Board, and I will leave that to you to take care of as you see fit. I will be attending the hearing tomorrow in the south county Board hearing room.

Thanks,

Peter

Peter Cantle, Deputy Director
Energy & Minerals Division
Planning and Development Department
Santa Barbara County
123 E. Anapamu Street
Santa Barbara, CA 93101
805.568.2519
pcantle@countyofsb.org

ERG Operating Company Violations
2011-Present

Application No	Application Name	Opened Date	Status	Closed Date	Location	Violation Items
11PTV-00000-00023	ERG GWP 65-24 Spill 4/11/11	4/11/2011	Closed	4/12/2011	Cat Canyon	30 bbls oil inside containment
11PTV-00000-00029	ERG TOGNAZZINI TANK BATTERY 31 2011 Inspection Violation	4/28/2011	Closed	5/18/2011	Cat Canyon	repair damaged piping, signage
11PTV-00000-00036	ERG CANTIN 20 2011 Inspection Violation	5/19/2011	Closed	7/1/2011	Foxen Canyon	cellar covering
11PTV-00000-00037	ERG CANTIN 33 2011 INSPECTION VIOLATION	5/19/2011	Closed	7/1/2011	Foxen Canyon	signage
11PTV-00000-00038	ERG CANTIN 25A 2011 INSPECTION VIOLATION	5/19/2011	Closed	7/1/2011	Foxen Canyon	signage
11PTV-00000-00039	ERG CANTIN 10-A 2011 INSPECTION VIOLATION	5/19/2011	Closed	7/1/2011	Foxen Canyon	impacted soils
11PTV-00000-00040	ERG CANTIN 24H 2011 INSPECTION VIOLATION	5/19/2011	Closed	7/1/2011	Foxen Canyon	repair leaking 2" valve, impacted soils, signage
11PTV-00000-00041	ERG WMS HOLDING 354-25 2011 Inspection Violation	6/3/2011	Closed	7/7/2011	Cat Canyon	repair small leak 2" KD flow line
11PTV-00000-00044	ERG WP HAMMON FEE B (NCT-2) 13 2011 Inspection Violation	6/21/2011	Closed	7/7/2011	Cat Canyon	Vegetation
11PTV-00000-00045	ERG LOS ALAMOS 159 2011 Inspection Violation	6/23/2011	Closed	7/7/2011	Cat Canyon	remove residual fluids
11PTV-00000-00046	ERG TOGNAZZINI TB SPILL 7-1-11	7/1/2011	Closed	7/18/2011	Cat Canyon	350 bbls oil inside containment, 150 bbls water inside containment, 3 bbls oil outside containment, 3 bbls water outside containment
11PTV-00000-00048	ERG WICKENDEN TANK BATTERY 2011 Inspection Violation	7/6/2011	Closed	8/3/2011	Foxen Canyon	pug or cap piping, remove oil rags and buckets
11PTV-00000-00052	ERG UPPER GWP Flowline Violation	8/2/2011	Closed	8/9/2011	Dominion	Pipeline leak in 2" KD
11PTV-00000-00054	ERG LOS ALAMOS 56 2011 Inspection Violation	8/9/2011	Closed	8/9/2011	Cat Canyon	Gas leak at well head
11PTV-00000-00069	ERG WICKENDEN 4 Spill 9-21-11	9/23/2011	Closed	10/5/2011	Foxen Canyon	4 bbls oil inside containment
11PTV-00000-00073	ERG WILLIAMS HOLDING TANK FACILITY Spill 10-1-11	10/3/2011	Closed	10/3/2011	Long Canyon	1 bbls oil inside containment, 90 bbls water inside containment
11PTV-00000-00074	ERG WILLIAMS HOLDING TANK FACILITY Spill 10-2-11	10/3/2011	Closed	10/3/2011	Long Canyon	40 bbls water inside containment
11PTV-00000-00075	ERG Williams Holding Pipeline Release 10/11/11	10/11/2011	Closed	10/11/2011	Cat Canyon	2 bbls oil outside containment, 70 bbls water outside containment
11PTV-00000-00078	ERG LOS ALAMOS EAST SIDE TANK BATTERY SPILL 11/4/11	11/7/2011	Closed	11/7/2011	Cat Canyon	1.50 bbls oil inside containment, 3.50 bbls water inside containment, 1.50 oil outside containment, 3.50 bbl water outside containment
11PTV-00000-00087	ERG TOGNAZZINI 348-C Spill 12/14/11	12/15/2011	Closed	1/13/2012	Cat Canyon	12 bbls oil outside containment
12PTV-00000-00002	ERG WMS HOLDING 366-25 Spill 1/23/12	1/23/2012	Closed	1/26/2012	Cat Canyon	.001 bbl oil inside containment
12PTV-00000-00006	ERG GWP 33-24 2012 Inspection Violation	2/13/2012	Closed	3/8/2012	Cat Canyon	Repair gas leak in cellar and pull fluids
12PTV-00000-00007	ERG GWP 256-24 2012 Inspection Violation	2/15/2012	Closed	2/22/2012	Cat Canyon	Remove residual free fluids and impacted soil
12PTV-00000-00008	ERG TOGNAZZINI Gato Ridge Spill 2/17/12	2/17/2012	Closed	3/2/2012	Cat Canyon	4 bbls oil outside containment, 2 bbls water outside containment
12PTV-00000-00009	ERG CANTIN TANK BATTERY Spill 2/19/12	2/21/2012	Closed	2/21/2012	Foxen Canyon	8 bbls oil inside containment, 15 bbls water inside containment,
12PTV-00000-00013	ERG WICKENDEN 5 Spill 3-7-12	3/7/2012	Closed	3/9/2012	Foxen Canyon	10 bbls oil inside containment
12PTV-00000-00015	ERG G.W.P. LEVEL 1-5 2012 Annual Inspection Violation	3/9/2012	Closed	4/13/2012	Cat Canyon	Label storage tank, missing bolts,
12PTV-00000-00016	ERG WH Compressor Plant 2012 Inspection Violation	3/9/2012	Closed	4/3/2012	Cat Canyon	label storage tank
12PTV-00000-00017	ERG WP HAMMON FEE B (NCT-2) TB 2012 Inspection Violation	3/9/2012	Closed	4/3/2012	Cat Canyon	exposed insulation, label tanks, vegetation,
12PTV-00000-00018	ERG RECRUIT FEE LEVEL 1-3 2012 Inspection Violation	3/9/2012	Closed	4/3/2012	Cat Canyon	failure to notify of removal of tanks, improve protective covering on pits, remove residual crude oil clean up impacted soils
12PTV-00000-00019	ERG LA EAST SIDE TB 2012 Inspection Violation	3/13/2012	Closed	4/13/2012	Cat Canyon	Label storage tank, improve secondary containment, plug openended piping, remove impacted soils

ERG Operating Company Violations
2011-Present

12PTV-00000-00023	ERG TOGNAZZINI 21-A 2012 Inspection Violation	4/26/2012	Closed	5/16/2012	Cat Canyon	vegetation, remove impacted soils
12PTV-00000-00035	ERG UNION TEXAS TANK BATTERY 2012 Inspection Violation	6/27/2012	Closed	10/3/2012	Cat Canyon	vegetation, signage
12PTV-00000-00036	ERG WMS HOLDING TANK BATTERY 2012 Inspection Violation	6/27/2012	Closed	8/1/2012	Cat Canyon	exposed insulation on tank, plug open ended piping, impacted soils
12PTV-00000-00037	ERG Williams A-1 Tank Facility 2012 Inspection Violation	6/27/2012	Closed	8/1/2012	Cat Canyon	Vegetation, signage, remove debris and impacted soils
12PTV-00000-00038	ERG PORTER TANK BATTERY 2012 Inspection Violation	6/27/2012	Closed	8/1/2012	Dominion	signage, remove fluids from cellar
12PTV-00000-00042	ERG Williams Holding Field Spill 8/1/12	8/2/2012	Closed	8/2/2012	Cat Canyon	4 bbls oil inside containment
12PTV-00000-00052	ERG Williams Holding 82 KD Tank Spill 8/31/12	8/31/2012	Closed	9/4/2012	Cat Canyon	3 bbls oil inside containment
12PTV-00000-00058	ERG WH-FUGLER #388 Spill 10-24-12	10/25/2012	Closed	10/25/2012	Cat Canyon	5 bbls oil inside containment
13PTV-00000-00017	ERG WH 82 KD Spill 4/25/13	4/26/2013	Closed	5/20/2013	Cat Canyon	39 bbls oil inside containment
13PTV-00000-00019	ERG RECRUIT FEE 144-25 Spill 5-20-13	5/21/2013	Closed	6/21/2013	Cat Canyon	5 bbls oil inside containment, 5 bbls water inside containment
13PTV-00000-00020	ERG RECRUIT FEE WW Line Spill 5-25-13	5/28/2013	Closed	7/3/2013	Cat Canyon	1 bbls oil outside containment, 14 bbls water outside containment
13PTV-00000-00034	ERG CAT CANYON WILLIAMS HOLDING 825-25 SPILL 10/04/13	10/4/2013	Closed	10/4/2013	Cat Canyon	14.50 bbls oil inside containment, 0.50 bbls oil outside containment
14PTV-00000-00002	ERG RECRUIT FEE TANK FACILITY LEVEL 1-3 Spill 2/4/14	2/4/2014	Closed	2/5/2014	Cat Canyon	2 bbls oil inside containment
14PTV-00000-00003	ERG WMS HOLDING 377-25 Spill 3-9-14	3/10/2014	Closed	3/10/2014	WMS Holding	4 bbls oil inside containment
14PTV-00000-00006	ERG TOGNAZZINI TANK BATTERY 31 Spill 4/14/14	4/15/2014	Closed	5/6/2014	Cat Canyon	7 bbls oil inside containment
15PTV-00000-00036	ERG Tognazzini Facility Spill 10/21/15	10/21/2015	Closed	10/26/2015	Cat Canyon	2 bbls oil inside containment, 5 bbls water inside containment