

SCS TRACER ENVIRONMENTAL

Formerly Tracer Environmental Sciences & Technologies, Inc., now a part of SCS Engineers.

January 28, 2011

Clerk of the Board
Santa Barbara County Board of Supervisors
123 E. Anapamu, 4th Floor
Santa Barbara, CA 93101

Re: Proposed Changes to the Santa Barbara County Petroleum Ordinance


Board Members:

The Coastal Oil and Gas Operators Group (COGOG) was formed over 7 years ago by independent oil company operators in Santa Barbara, San Luis Obispo and Ventura Counties. The sole purpose of the group is to share information regarding compliance with existing and upcoming regulations. As you may recall, the COGOG worked closely with Santa Barbara County Petroleum and County Counsel in the overhaul of the Petroleum Ordinance. We met almost weekly with the County over the period of a year. When the Ordinance came to your Board, it was supported by the Industry and your staff. The COGOG continues to work with agencies on emerging regulations and on compliance issues.

At your January 11, 2011, Board Hearing, the Board expressed a desire to strengthen language regarding companies that frequently spill under the volumetric thresholds that had been previously proposed (and vetted with the COGOG) by the County. While the COGOG did not express support or opposition to those thresholds, none of our member companies commented at the January 11 hearing. The reason that there was not strong opposition is because the County staff had worked with the Industry to insure that the thresholds were technically sound and there were no surprises. After the January 11 hearing, we are disappointed to report that there has been no effort by County staff to communicate with the Industry on this substantial and technically flawed change, specifically the proposal to designate an operator high risk if they have more than 5 spills of greater than 42 gallons in a year. As such, there has been no opportunity for industry input.

We respectfully request that this item be continued until County staff has met with the Industry to discuss the proposed changes to the Ordinance. The next meeting of the COGOG is on February 15, 2011. Your staff is invited to this meeting. We will dedicate the entire meeting to this issue if need be. In this way, we can insure that technical issues are discussed with your staff and an attempt at resolution occurs outside of the Board chambers. Additionally, since the majority of onshore oilfields are located in the North County, we respectfully request that this item be heard in the North County at both hearings. Your consideration is greatly appreciated.

Sincerely,



John M. Deacon
Senior Project Advisor

