

## **Appendix 3**

### **Comments on Proposed Zoning Amendments Submitted by Western States Petroleum Association**



Western States Petroleum Association  
Credible Solutions • Responsive Service • Since 1907

August 3, 2006

Mr. Doug Anthony  
Deputy Director - Energy Division  
Santa Barbara County Planning and Development Department  
123 East Anapamu Street  
Santa Barbara, CA 93101

RE: WSPA Comments to Proposed Height Ordinance Amendments, Case #s 06ORD-00000-00007-00008

Dear Mr. Anthony,

Western States Petroleum Association (WSPA) has reviewed the County of Santa Barbara's Proposed Height Ordinance Amendments. WSPA's review and comments at this time are limited to the proposed amendments that are pertinent to oil and gas facilities. Of particular interest to WSPA are proposed amendments related to temporary drilling rigs and workover/pulling rigs (Article II, Section 35-127.A.1.a.4, and Article III, Section 35-276.A.1.a.4); and various equipment production equipment components such as amine columns, distillation columns, stripper columns, and flare stacks that typically exceed 50 feet in height in order to achieve their function.

The purpose of the proposed amendments is to resolve a present inconsistency within the ordinances related to height limitations, and provide the needed flexibility to allow oil and gas projects to proceed within the context of the County's overall review process, taking into consideration the technical requirements of certain oil and gas equipment. WSPA generally concurs with the County's approach; however, we respectfully request the County's consideration of the following proposed revisions related to workover/pulling rigs.

1. Definition of Oil/Gas Workover/Pulling Rig. The following revision is requested to Article II, Division 2, Definitions, and Article III, Division 2, Definitions.

*OIL/GAS WORKOVER/PULLING RIG: The derrick mast, draw works, and attendant surface equipment to service oil/gas or injection wells, including, among other things, running the pump and tubing, replacing parts, fixing casing, and plugging and abandoning a well. These rigs are typically ~~differ from oil/gas drilling rigs in that they are mobile, wheel-based trucks capable of moving from one well to another.~~*

This revision reflects the fact that while workover/pulling rigs are typically mobile, this is not always the case.

2. Height Exemption for Temporary Oil/Gas Drilling Rigs and Workover/Pulling Rig. The following revision is requested to Article II, Division 7, Section 35-127.A.1.a.4.

*Temporary drilling rigs and workover /pulling rigs necessary to explore for and develop oil and gas reservoirs or to operate the La Goleta gas storage reservoir (located on APN 071-210-001, as of June 30, 2006) may exceed the applicable height limit for a period of four years or less, provided the temporary use is completed in a diligent manner. Upon written request by the operator, the Director may grant ~~up to two~~ one-year extensions, provided that the operator is diligent ~~diligence~~ in completing an established drilling program or for well abandonment.*

Work over and pulling rigs are used throughout the life of an oil and gas development project. As such, they should be allowed to be used until the project is abandoned.

The language as written allows an exemption from the height limit for a period of four-years, with up to two one-year extensions. The requested revision is based on our experience that while this timeframe for use of a workover/pulling rig on some projects is reasonable, this timeline is not always adequate. The revision would allow the Director additional discretion to grant one-year extensions, if necessary to complete a drilling program.

WSPA appreciates this opportunity to comment and looks forward to continuing dialogue on these issues. Do not hesitate to call me at (805) 966-7113 if you have any questions concerning these comments.

Regards,



Bob Poole  
Coastal Coordinator