

Alexander, Jacquelyne

From: Erik Vasquez <evasquez@VaqueroEnergy.com>
Sent: Monday, February 16, 2015 8:50 PM
To: sbcob
Cc: Erik Vasquez
Subject: BOS: Comments regarding proposed changes to Chapter 25 Petroleum Ordinance

Dear Mr. Allen,

We are writing to express our concerns regarding the proposed changes to Chapter 25, Petroleum Ordinance. Our concerns are predominantly based on two areas:

- Lack of industry involvement and input prior to introduction of the proposed changes. Workshops should have been conducted to discuss the proposed changes prior to presentation to the Board for implementation;The deprivation of due process of appeals as proposed.
- Chapter 25 currently has a section dedicated to due process of appeals including an appeal board made of individuals who possess industry expertise. The proposed changes circumvent the established appeal process in favor of a process where the Director has sole authority to set penalties, pass judgment and mange appeals thereby playing judge, jury and executioner with no oversight by any third party. The proposed changes, if and when adopted, should be subject to the appeal process currently established in Chapter.

Kind Regards,

Erik Vasquez

PetroRock, LLC