



APPENDIX D

Comments Received on the Draft Mitigated Negative Declaration and District Response to Comments



Response to Comments Received for the Aera Energy Belridge Oilfield Complex Steam Generators Project S-1084210, S-1084406, S-1084433, S-1084434

The San Joaquin Valley Air Pollution Control District (District) provided a Notice of Intent to adopt a Mitigated Negative Declaration for the construction and operation of up to twenty two (22) natural gas fired steam generators within the existing South Belridge Oilfield within Aera's Heavy Oil Western stationary source. The Initial Study and Draft Mitigated Negative Declaration were available for public review from March 28, 2011 to April 27, 2011.

The following party provided written comments on the proposed Initial Study and Mitigated Negative Declaration:

- California Department of Oil, Gas, and Geothermal Resources (DOGGR)

All comments were duly considered and addressed in preparation of the Final Mitigated Negative Declaration. A copy of the comment letter is incorporated into this document as Attachment 1. A summary of DOGGR's comments and the District's responses follow below.

California Department of Oil, Gas and Geothermal Resources

Comment 1: The maps provided in the Initial Study and Draft Mitigated Negative Declaration are not sufficient to identify specific wells within the project areas. As such; appropriate measures necessary for well abandonment or mitigation of other well issues, such as inspection and leakage testing of unexposed wells, cannot be identified at this time. DOGGR requires that, as specific generator sites are identified within the project areas, Aera submit maps identifying all wells in the sites for DOGGR's review. DOGGR further recommends a 10-foot no-build radius around the wells recorded on these maps.

Response 1: The proposed project includes the construction of steam generators in two (2) project areas. Project Area 1 is located within the northern half of the project site and Project Area 2 is located within the southern half of the project site (see Figures 3 and 4). The construction site for only Project Area 1 has been identified at this time. Aera has evaluated Project Area 1 for abandoned and active well conflicts consistent with DOGGR's Well Review Program. A site map and list of identified wells located in Project Area 1 are provided in Attachment 2 and have been submitted to DOGGR for review. Aera's Investment Recovery Team will evaluate the abandonment records of the wells identified and obtain the appropriate permits as needed for abandonment, reabandonment or modifications to the wells.



As specific generator sites are identified within the project areas, the following mitigation measures will be incorporated into the associated Authority to Construct, as conditions of project approval:

- HAZ-1 – Prior to the start of construction activities, Aera shall provide the District with documentation demonstrating that maps identifying all wells in the vicinity of the sites have been submitted to DOGGR for compliance with DOGGR’s “Well Review Program”.
- HAZ-2 – During construction activities, if unknown, unrecorded or abandoned wells are discovered, or if any wells are damaged, Aera shall immediately notify the DOGGR.
- HAZ-3 – Any wells discovered or exposed during construction activities will be tested for flammable vapors.

The Hazards and Hazardous Material discussion in the Mitigated Negative Declaration has been amended to address DOGGR’s concerns and the measures above have been incorporated into the project to mitigate potential impacts.

Comment 2: DOGGR has the authority to order the reabandonment of a previously abandoned well when the construction of a structure in the vicinity of that well could result in hazards. As project proponents are responsible for the cost of reabandonments, DOGGR recommends that no structures be built over or in proximity to an abandoned well location. DOGGR further recommends that, if wells requiring reabandonments are on adjacent property or near the property line, all structures be set back sufficiently to allow access to those wells.

Response 2: The issues identified in Comment 2 are discussed in further detail in DOGGR’s Well Review Program document. The Well Review Program is available to developers to assist them in identifying potentially dangerous impacts and complying with DOGGR requirements and recommendations for reducing those impacts. Aera is familiar with this program and will implement the pertinent elements to this project. As specific generator sites are identified within the project areas, the following mitigation measure will be incorporated into the associated Authority to Construct, as a condition of project approval:

- See Response 1, mitigation measures HAZ-1 through HAZ-3.

The Hazards and Hazardous Material discussion in the Mitigated Negative Declaration has been amended to address DOGGR’s concerns and the measure above has been incorporated into the project to mitigate potential impacts.



Comment 3: In the event that abandoned or unrecorded wells are uncovered or any wells are damaged during construction activities remedial plugging operations may be required. DOGGR must be contacted for requirements and approval of these remedial activities.

Response 3: See Response 1, mitigation measures HAZ-1 through HAZ-3.

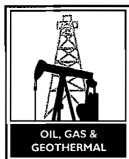


May 19, 2011

Attachment 1

STATE OF CALIFORNIA, RESOURCES AGENCY

EDMUND G. BROWN, JR., GOVERNOR



DEPARTMENT OF CONSERVATION

DIVISION OF OIL, GAS AND GEOTHERMAL RESOURCES

4800 Stockdale Highway • Suite 417 • BAKERSFIELD, CALIFORNIA 93309

PHONE 661 / 322-4031 • FAX 661 / 861-0279 • WEBSITE conservation.ca.gov/DOG

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APR 27 2011

Permits Srvc
SJVAPCD

April 25, 2011

Ms. Jessica Willis
San Joaquin Valley APCD
1990 East Gettysburg Ave.
Fresno, CA 93726-0244

Subject: Initial Study and Proposed Mitigated Negative Declaration
Aera Energy Belridge Oilfield Complex Steam Generator Project
Project No. S-1084210, S-1084406, S-1084433, and S-1084434
Portions of Sections 20, 28, 29, 33, and 34 T28S R21E and
Sections 2, and 3 T29S R21E MD B&M

Dear Ms. Willis:

The Department of Conservation's Division of Oil, Gas, and Geothermal Resources (Division) has reviewed the proposed project. The Division supervises the drilling, maintenance, and abandonment of oil, gas, and geothermal wells in California. As a responsible agency, the Division offers the following comments for your consideration.

The proposed project is located within the administrative boundaries of South Belridge oilfield. The maps supplied are not specific enough to list specific wells or their status at this time. Well density suggests that many wells will need to be addressed for possible abandonment with each of the projects. As the areas are defined for each steam generator site, the Division shall be supplied with maps sufficient to identify the wells involved. The Division will then be able to address the steps necessary to abandon or otherwise mitigate well issues.

For example, the wells may need to be exposed for inspection and leakage testing prior to construction. Remedial operations may be required. The Division recommends that the well locations be recorded on all future maps related to this project with a 10-foot no-build radius.

The Division recommends that no structure be built over or in proximity to an abandoned well location. Section 3208.1 of the Public Resources Code authorizes the State Oil and Gas Supervisor to order the reabandonment of a previously abandoned well when construction of any structure over or in the proximity of a well could result in a hazard. The cost of reabandonment operations is the responsibility of the owner or developer of the project upon which the structure will be located. If a well requiring reabandonment is on an adjacent property and near the common property line, the

Comment 1

Comment 2

The Department of Conservation's mission is to balance today's needs with tomorrow's challenges and foster intelligent, sustainable, and efficient use of California's energy, land, and mineral resources.



Ms. Thomsen
Parcel Map 11848
Page 2

Division recommends that the structure be set back sufficiently to allow future access to the well.

Regardless, if any other abandoned or unrecorded wells are uncovered or damaged during excavation or grading, remedial plugging operations may be required. This office must be contacted to obtain information on the requirements for and approval to perform remedial operations.

Comment 3

Thank you for the opportunity to comment on this project. If you have any questions, please call **Tom Giallardo** at the Bakersfield district office: 4800 Stockdale Highway, Suite 417, Bakersfield, CA 93309; phone **(661) 334-3663**.

Sincerely,

A handwritten signature in black ink that reads "Burton R. Ellison".

Burton R. Ellison
Senior Oil and Gas Engineer