

November 6, 2013

Mark Nechodom, Director
Department of Conservation
Tim Kustic, Supervisor
Department of Oil, Gas, and Geothermal Resources
801 K Street
Sacramento, CA 95814

RE: Process on Adoption of Well Stimulation Regulations

Dear Director Nechodom and Supervisor Kustic:

The undersigned wish to thank you in advance for the prompt initiation of the process to adopt regulations for the permitting of well stimulation. We also appreciate the delay in completing the regulations over the last year until the Legislature completed their activities, specifically Senate Bill 4, so new requirements that were not in the discussion draft regulations (issued December 2012) could be incorporated.

We have two requests regarding your tentative plans for managing the regulation-adopting process. First, assuming the regulations are released on November 15, 2013, we strongly feel that a 60-day comment period is too abbreviated. Due to the holiday period encompassed by that timeframe, a 75-day period is in order. That would extend the comment period to the beginning of February.

Second, we understand that the plan is to hold three public hearings to gather comments on the draft. We assume that Sacramento will be the location of one of the hearings and possibly Los Angeles or Bakersfield if sites outside of Sacramento also be utilized. Because of the great public interest in this subject, we request that at least two more locations be used for public hearings – Salinas and Ventura/Santa Barbara. These are localities currently or potentially close to drilling, including offshore operations. Acknowledging that the purpose of the hearings is to get comments on the draft regulations, rather than interactive workshops like those held earlier this year, we respectfully suggest that more hearings will increase the transparency of the process.

Thank you for your consideration of these requests and we look forward to working with you in the promulgation of the regulations, as well as the interim emergency regulations, EIR, and study processes established by SB 4.

Sincerely,

Bill Allayaud
California Director of Government Affairs
Environmental Working Group

Dan York
Associate Director
The Wildlands Conservancy

November 6, 2013

Page 2 of 2

Jeff Kuyper
Executive Director
Los Padres ForestWatch

Jhon Arbelaez
California Organizer
Earthworks

Jennifer A. Waggoner
President
League of Women Voters of California

Giulia Good Stefani
Attorney
Natural Resources Defense Council

Andrew Grinberg
Oil and Gas Program Coordinator
Clean Water Action

Cathleen Dorinson
Board Member
Mainstreet Moms, Citizen Action Group

Steve Craig
Citizens Planning Alliance of South Monterey
County & Halt Oil Lease Drilling Now, Monterey