



VENOCO, INC.

2016 FEB 22 PM 3:17
CALIFORNIA REGIONAL WATER
QUALITY CONTROL BOARD
LOS ANGELES REGION

February 18, 2016

Los Angeles Regional Water Quality Control Board
320 W. Fourth Street, Suite 200
Los Angeles, CA 90013
Attn: Joshua Cwikla

SUBJECT: CALIFORNIA WATER CODE DIRECTIVE PURSUANT TO SECTION 13267 – ORDER TO SUBMIT INFORMATION – THE DISPOSAL OF WELL DRILLING FLUIDS, WELL COMPLETION FLUIDS, AND PRODUCTION FLUIDS TO LAND FOR VENOCO, INCORPORATED OIL AND GAS OPERATIONS IN LOS ANGELES AND VENTURA COUNTY, CALIFORNIA

Dear Mr. Cwikla:

The purpose of this letter is to provide an addendum to the January 15, 2016 letter in response to the information requested in the Los Angeles Regional Water Quality Control Board letter dated December 18, 2015 regarding the discharge of oil production fluids to lands we currently operate in the Los Angeles Regional Water Quality Control Board's jurisdiction. Venoco, Inc. currently operates one oil and gas production facility within the Los Angeles Region. That facility is located at 9865 Olympic Blvd., Beverly Hills, California 90212. Our January 15, 2016 letter (attached) provided requested information concerning the Beverly Hills Facility.

Venoco also operates a crude oil pipeline, portions of which are located within the Los Angeles Regional Water Quality Control Board's jurisdiction. Venoco has operated this pipeline since 1999. Along the pipeline route, there are four pipeline pigging stations located in Ventura County, each containing one surface sump. An overall map of these pigging stations and individual maps of each station is attached.

The four surface sumps are located at:

- 5777 W. Pacific Coast Highway, Ventura, Ca, (Rincon Pipeline Station)
- 301 W. Front Street, Ventura, Ca. (Ellwood Pipeline 12" Lateral)
- Rear 191 Ottawa Street, Ventura, Ca. (Ellwood Pipeline Avenue Meters)
- 1200 Spinnaker Drive, Ventura, Ca. (Ellwood Pipeline Union Marine)

Each of the above sumps is considered active. Venoco has no knowledge of any inactive, historic, or closed sumps in the area of our operations. All of the active sumps are cylindrical in shape, are constructed with steel, and are coated with an industrial coating. The dimensions and volumes of these sumps are presented in the attached spreadsheet.

In the event that one of these sumps needs to be abandoned, the sump would be cleaned and excavated from the soil. Confirmation soil sampling in the area of excavation would be conducted by procuring the services of a State of California Registered Professional Geologist. Any impacted soil would be disposed of in accordance with the recommendation of the professional geologist. An assessment of groundwater conditions may be necessary, based on the initial soils assessment results.

The estimated total annual amount of crude oil previously discharged to each active sump is presented in the attached spreadsheet. The estimated annual amount of crude oil to be discharged to active sumps going forward is identical to historical annual amounts.


Crude oil discharged to the sumps is a result of the routine monthly pigging operations performed on the pipeline. The pig will push a predictable amount of crude oil into each pig receiver trap. When removing the pig from the trap, the crude oil is drained to the sump. Once all oil is drained to the sump, the oil is then pumped back into the pipeline. No crude oil is disposed of in the pigging procedure.

A crude oil assay of the typical crude oil discharged into each sump is attached. No solidified solid waste has been generated in the sumps by Venoco since 1999. It is unknown if the previous operator generated any solidified solid waste.

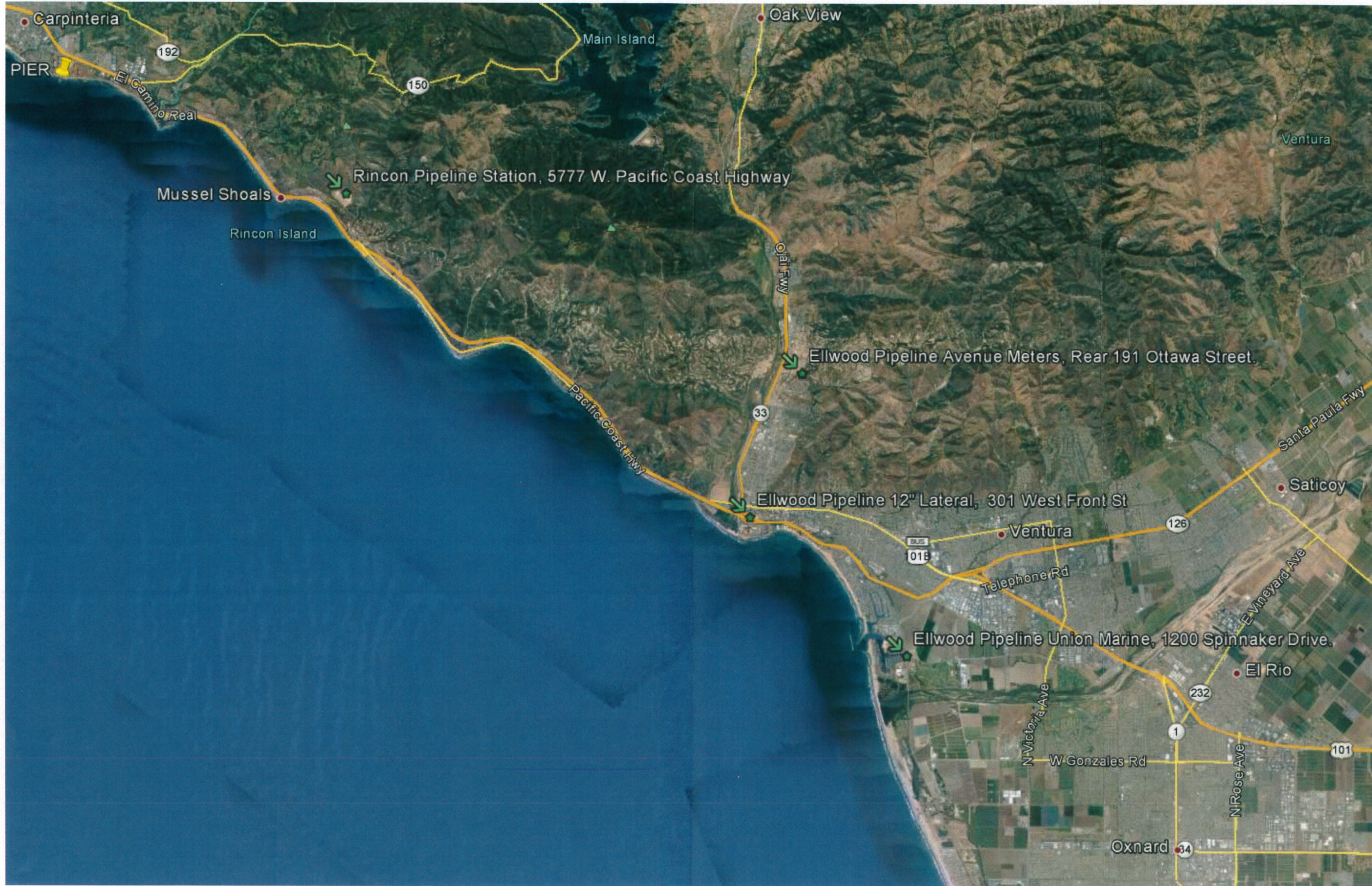
To our knowledge, there are no domestic, municipal, or commercial water wells within a half-mile radius of any of our active sumps. To our knowledge, there are no monitoring wells within a half-mile radius of any of our active sumps.

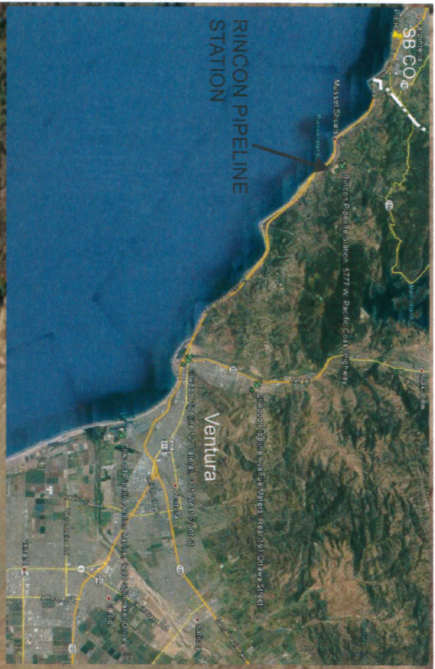
I, Pat Corcoran certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Should you have any questions regarding information contained in this package, please call me at (805) 745-2264.

Sincerely,

Pat Corcoran
Environmental Coordinator
Venoco, Inc

Cc: Larry Huskins, Venoco, Inc.
Doug Taylor, Venoco, Inc
Adam Taing, LARWQCB



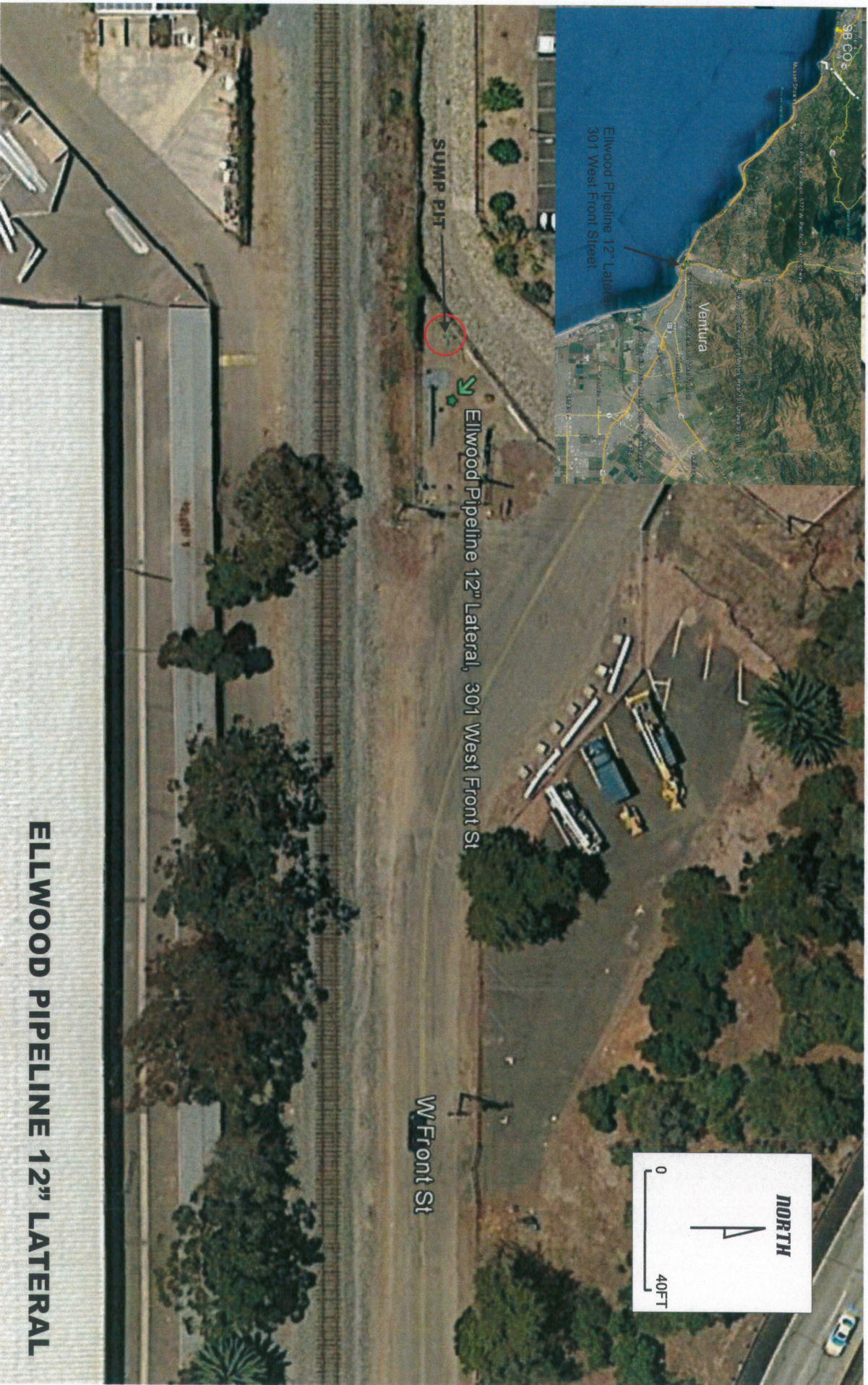


Rincon Pipeline Station, 5777 W. Pacific Coast Highway

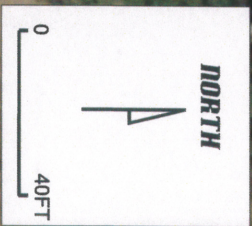
Sump Location

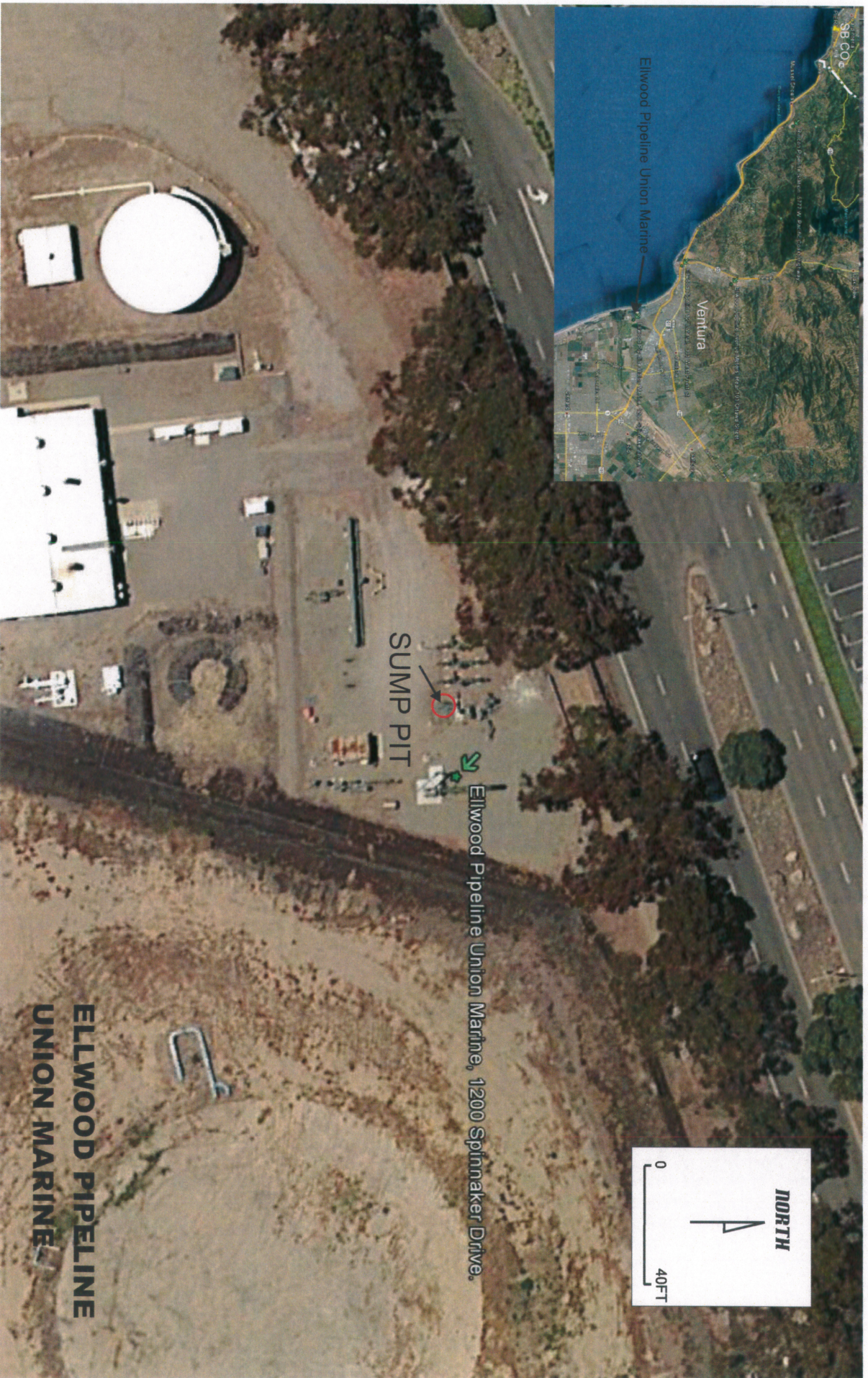
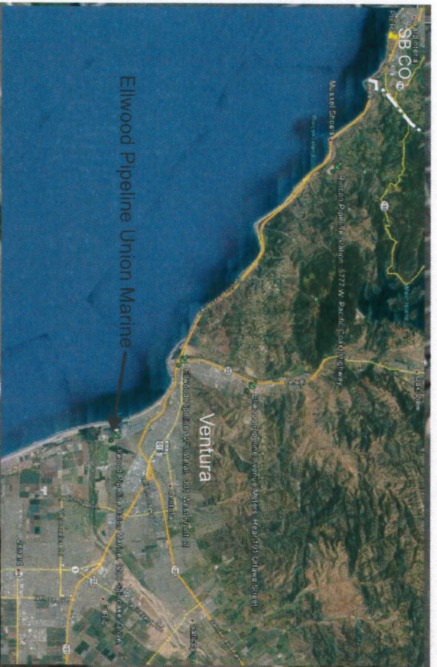
RINCON PIPELINE STATION





ELLWOOD PIPELINE 12" LATERAL





SUMP PIT

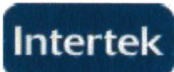
Ellwood Pipeline Union Marine, 1200 Spinnaker Drive.

**ELLWOOD PIPELINE
UNION MARINE**



VENOCO, INC.
 SUMPS IN RWQCB
 LOS ANGELES REGION

Owner and/or Operator	Field Name	County	Sump Name/Description	Sump Location Lat/Long		(Dia.xDepth) Sump Volume in cu. ft.	When Was the Sump First Excavated?	How Many Years Was the Sump Active?	Total Annual Amount of Fluid Discharged in bbls.	Composition of Fluids	Was the Sump Filled with Soil or Other Material (Yes/No)	When Was the Sump Filled?	What Material Was Used to Fill the Sump?	Was There Solidified Waste? (Yes/NO)	If Yes, What Was the Composition of those Solids?
Venoco, Inc.	Rincon Pipeline Station	Ventura	28.27 Sqft-Surface Sump (35 bbl), with P-V relief valve	34.35562	-119.424850	(6'x8'), 226.2 cu.ft.	1970 (Approx.)	46.0	234.0	Crude Oil	No	N/A	N/A	No	N/A
Venoco, Inc.	Ellwood Pipeline 12" Lateral	Ventura	12.56 Sqft-Surface Sump (35 bbl), Pit Tank	34.277071	-119.305611	(4'x4.9'), 61.8 cu.ft.	1970 (Approx.)	46.0	59.0	Crude Oil	No	N/A	N/A	No	N/A
Venoco, Inc.	Ellwood Pipeline Avenue Meters	Ventura	28.27 Sqft-Surface Sump (35 bbl), Pit Tank	34.312139	-119.290104	(6'x8'), 226.2 cu.ft.	1970 (Approx.)	46.0	29.00	Crude Oil	No	N/A	N/A	No	N/A
Venoco, Inc.	Ellwood Pipeline Union Marine	Ventura	28.27 Sqft-Surface Sump (35 bbl), Pit Tank	34.243215	-119.259127	(6'x8'), 226.2 cu.ft.	1970 (Approx.)	46.0	172.00	Crude Oil	No	N/A	N/A	No	N/A



Report of Analysis

Client: VENOCO INC	Client Reference Number: PO# CP14-0003DT
Job Location: Carpinteria, CA	
Our Reference Number: US260-0020266	
Lab Reference Number: 2014-LOSA-000091	

Sample ID: 2014-LOSA-000091-001	Date Taken: 17-Jan-2014
Sample Designated As: CRUDE	Date Submitted: 17-Jan-2014
Vessel/Location: VENOCO/ Santa Clara Unit	Date Tested: 27-Jan-2014
Representing: ID Mark:Santa Clara Unit ,67 F :Dated 1/16/14 @ 0945	

Method	Test	Result	Unit
ASTM D5002	Average API Gravity	18.4	°API
ASTM D4294	Sulfur Content	5.11	Wt %
ASTM D445	Kinematic Viscosity @ 100 °F/ 37.8	203.7	mm ² /s
ASTM D445	Test Temperature	25.0	°C
ASTM D445	Kinematic Viscosity @ Specified Tem	509.2	mm ² /s
ASTM D4928	Water Content	0.62	Vol %
ASTM D7536 MOD	Total Chlorides	107.9	mg/kg
ASTM D664	Procedure Used	A	
ASTM D664	Acid Number	1.15	mg KOH/g
ASTM D7169	Boiling Point Distribution	See Attached Report	
UOP 163	H2S	42	ppm Wt
ASTM D5708_MOD	Method	A	
ASTM D5708_MOD	Calcium	15.3	mg/kg
ASTM D5708_MOD	Potassium	10.2	mg/kg
ASTM D5708_MOD	Sodium	104	mg/kg
ASTM D5863	Procedure Used	A	
ASTM D5863	Vanadium Content	170	mg/kg
ASTM D5863	Nickel Content	92	mg/kg

¹ Outside Scope of Method

Signed: _____

Intertek
Jamal Dahabra, Laboratory Coordinator

Date: _____



January 15, 2016

Los Angeles Regional Water Quality Control Board
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Los Angeles, CA 90013
Attn: Joshua Cwikla

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The requested information is provided as follows:

- Venoco, Inc. has not discharged well drilling fluids, well completion fluids, or oil production fluids to sumps or ponds.
- Venoco, Inc. does not have or operate any sumps or ponds for the purpose of produced fluids waste discharge.
- Venoco, Inc. does not have any inactive ponds or sumps.
- Venoco, Inc. has no plans to install any sumps or ponds for the purpose of produced fluids discharge.
- All produced water and routine well work fluids at the site are injected back into the producing formation.

- Any produced fluids found to be unsuitable for injection on-site, would be transported to a permitted injection facility for disposal.

I, Larry Huskins certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Should you have any questions regarding information contained in this package, please call me at (805) 745-2199.

Sincerely,

A handwritten signature in blue ink, appearing to read "Larry Huskins", written over a horizontal line.

Larry Huskins
Operations Manager
Venoco, Inc

Cc: Pat Corcoran, Venoco, Inc.
Sally English, Venoco, Inc.