

**Compass  
Global  
Resources, LLC**

P O Box 2858  
Carmel, California 93921  
Phone 831 277-4181  
Phone 713 806-2534  
E-mail t.budden@compassgr.com

Paula Rasmussen  
LARWQCB  
320 West 4<sup>th</sup> Street Suite 200  
Los Angeles, CA 90013

April 26, 2016

2016 MAY -2 PM 1:53  
CALIFORNIA REGIONAL WATER  
QUALITY CONTROL BOARD  
LOS ANGELES REGION

RE: NOV Dated 4/22/16  
Claim# 7015 0640 0006 6057 9574

Dear Ms Rasmussen:

Compass Global Resources, LLC (CGR) is in receipt of the LARWQCB NOV dated 4/22/16 and referenced above. This is an unjustified NOV as CGR responded to the initial directive on 1/11/16. A copy of the response is attached for your information. A further reiteration of the initial statement is made below for your records.

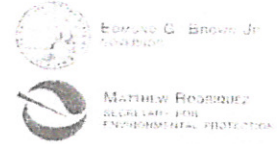
Please be advised that Compass Global Resources, LLC has NEVER operated any oil and gas properties in Los Angeles or Ventura Counties and has NEVER discharged fluids of any kind to lands within Ventura and Los Angeles Counties.

Please remove the aforementioned NOV immediately.

Sincerely,

R T Budden  
Managing Member

Attachments: Response dated 1/11/16.



Los Angeles Regional Water Quality Control Board

See Note below

December 18, 2015

Mr. R. Terence Budden  
Compass Global Resources, LLC  
P.O. Box 2858  
Carmel, CA 93921

VIA CERTIFIED MAIL  
RETURN RECEIPT REQUESTED  
CLAIM NO. 7015 0640 0006 6057 7761

**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 COMPASS GLOBAL RESOURCES, LLC OIL AND GAS OPERATIONS IN LOS ANGELES AND VENTURA COUNTY, CALIFORNIA**

Dear Mr. Budden:

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board), is the public agency with primary responsibility for the protection of ground and surface water quality within the major portions of Los Angeles and Ventura Counties.

Recently, the California State Legislature has requested that the State Water Resources Control Board (State Water Board) obtain information from operators of oil and gas production facilities regarding the management of fluids associated with oil and gas production and the potential impacts on water quality. As you know, a common oil and gas industry practice is to discharge oil production fluids to land, typically into sumps or produced water ponds.

Operator contact information available from the California Division of Oil, Gas, and Geothermal Resources (DOGGR) has identified Compass Global Resources, LLC as an operator of oil and gas wells within either DOGGR District One or Two, or as an operator within multiple DOGGR Districts. The enclosed Order issued pursuant to section 13267 of the California Water Code requires the submittal of technical reports regarding information on how fluids associated with oil and gas production are managed within the fields you operate. The Regional Board will provide this information to the State Water Board. If you currently do not operate any oil and gas facility within Los Angeles or Ventura Counties, please respond to this Order with such information.

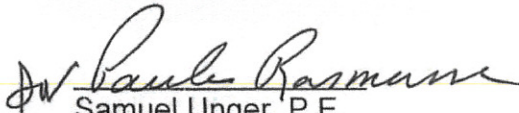
Please be advised that Compass Global Resources, LLC has never operated in Los Angeles or Ventura counties and has never discharged fluids to land in these counties.

CHARLES SIBBOLD, CHAIR | SAMUEL UNDER, EXECUTIVE OFFICER

R.T. Budden  
1/11/16

The Regional Board requires this information as set forth in the attached Order No. R4-2015-0324 (Order) no later than **30 days** from the issuance of the Order. If you have any questions regarding this matter, please contact Mr. Joshua Cwikla at (213) 576-6713, or by email at [joshua.cwikla@waterboards.ca.gov](mailto:joshua.cwikla@waterboards.ca.gov), or Dr. Yue Rong at (213) 576-6710, or by email at [yue.rong@waterboards.ca.gov](mailto:yue.rong@waterboards.ca.gov)

Sincerely,

  
Samuel Unger, P.E.  
Executive Officer

Enclosure: Order No. R4-2015-0324

cc: John Borkovich, State Water Resources Control Board  
Christine York, State Water Resources Control Board  
Janice Zinky, State Water Resources Control Board  
Eric Gillman, Office of Chief Counsel, State Water Resources Control Board  
Bruce Hesson, Department of Oil, Gas, and Geothermal Resources  
Pat Abel, Department of Oil, Gas, and Geothermal Resources  
Daniel Dudek, Department of Oil, Gas, and Geothermal Resources