

I am here to comment on item #8 on the agenda, which is the Williamson Act consistency review for the Excelaron/Mankins conditional use permit. This project has been described for you as oil wells and a "staging area."

This project is not a "staging area." It is an oil production facility and those are the words that have been used to describe it for the past three years since it was first proposed to the county Planning Department. Nowhere in thousands of pages of documents has the word "staging area" ever been used.

This "staging area" which will occupy a graded pad of over 40,000 square feet of contracted land is an industrial facility designed to process over 60,000 gallons of water per day. The facility will burn over 900 gallons of propane per day to generate electricity and heat water for injection into the oil wells. The returned mixture of hot water, gases, and viscous oil will be separated, processed, and stored prior to loading onto trucks for transportation from the site.

Please note that the definition of petroleum extraction in table 2.2 allows on-site processing only to the extent necessary to conform to pipeline requirements. It does not include truck transportation.

Excelaron's project will have the associated emissions, traffic, odors, and noise of an industrial facility. Its potential impact on local agriculture does not meet the three principles of consistency.

The location of such a facility on contracted land is inconsistent with the intention and language of the Williamson Act. AB 1492, section 51250 clearly defines industrial facilities exceeding 2,500 square feet as not permissible on Williamson Act contracted land. Development of Excelaron's facility would therefore constitute a material breach of contract with the State.

I would like to submit copies of the Process Flow Diagram and Facility Layout Plans from the Cannon Facility Engineering Report dated July 1, 2009 for your consideration and hope that you see this project for what it is. Not a "staging area" but an industrial facility that is not compatible with agriculture on contracted land.