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10 IN THE SUPERIOR COURT FOR THE STATE OF CALIFORNIA
11 FOR THE COUNTY OF KERN

12 ASSOCIATION OF IRRITATED RESIDENTS,
13 CENTER FOR BIOLOGICAL DIVERSITY,
14 and SIERRA CLUB, non-profit corporations,

15 Petitioners,

16 vs.

17 CALIFORNIA DEPARTMENT OF
18 CONSERVATION, DIVISION OF OIL, GAS,
19 AND GEOTHERMAL RESOURCES, and DOES I
20 through V,

21 Respondents.

22 and

23 AERA ENERGY, LLC, and DOES VI through C,

24 Real Parties in Interest.

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**VERIFIED PETITION FOR WRIT OF
MANDATE**

(Cal. Code of Civil Procedure §§ 1085,
Cal. Public Resources Code §§ 21167 and
21168.5)

1 amongst the most-polluted communities in the state, with extremely poor air quality and highly
2 contaminated water sources. Residents of the area are burdened in other ways as well, and suffer
3 from high levels of poverty and unemployment. By allowing drilling projects to go forward without
4 environmental review, DOGGR's actions threaten to add to the burdens of already vulnerable
5 communities.

6 6. Petitioners bring this petition for a writ of mandate to require DOGGR to stop rubber-
7 stamping permits to drill oil wells, study the environmental impacts of each of the wells it approves,
8 and suspend the permits issued to Aera Energy until it completes the required environmental review.

9 **II. JURISDICTION AND VENUE**

10 7. This Court has jurisdiction over this action pursuant to Code of Civil Procedure
11 sections 1085 and Public Resources Code section 21167. Petitioners have performed all conditions
12 precedent to filing suit and/or are excused from such conditions.

13 8. Venue is proper in this Court pursuant to Code of Civil Procedure section 393, since
14 the cause of action arose in Kern County and the impacts of DOGGR's actions are felt in Kern
15 County.

16 9. Petitioners have provided written notice of their intention to file this Petition to
17 DOGGR, and are including the notice and proof of service as Exhibit A to this Petition.

18 10. Pursuant to Code of Civil Procedure section 388, Petitioners served the Attorney
19 General with a copy of their Petition along with a notice of its filing, and are including the notice and
20 proof of service as Exhibit B to this Petition.

21 **III. PARTIES**

22 11. Petitioner ASSOCIATION OF IRRITATED RESIDENTS ("AIR") is a California
23 non-profit corporation based in Kern County. AIR formed in 1991 to advocate for clean air and
24 environmental justice in San Joaquin Valley communities. AIR has several dozen members who
25 reside in Kern, Tulare, Kings, Fresno, and Stanislaus Counties. AIR members through themselves,
26 their families, and friends, have direct experience with the many health impacts that arise from the
27 type of pollution emissions associated with oil drilling in the South Belridge Oil Field.

1 12. Petitioner CENTER FOR BIOLOGICAL DIVERSITY (the “Center”) is a non-profit
2 corporation with offices in San Francisco and elsewhere in California and throughout the United
3 States. The Center is actively involved in environmental protection issues throughout California and
4 North America and has approximately 50,000 members. The Center’s members and staff include
5 individuals who live, work, and recreate in communities threatened by the oil drilling activities
6 permitted by DOGGR. The Center has a long history of environmental protection through science,
7 policy, education, and legal advocacy in California, and through this action seeks to protect public
8 health, safety, and the environment by requiring DOGGR to comply with the requirements of
9 CEQA.

10 13. Petitioner SIERRA CLUB is a national non-profit corporation with approximately
11 620,000 members, roughly 146,000 of whom live in California. Sierra Club’s Kern-Kaweah chapter
12 has approximately 650 members in Kern County. Its members are affected by the oil and gas
13 approvals at issue here. The Sierra Club is dedicated to exploring, enjoying, and protecting the wild
14 places of the earth; to practicing and promoting the responsible use of the earth’s ecosystems and
15 resources; to educating and encouraging humanity to protect and restore the quality of the natural
16 and human environment; and to using all lawful means to carry out these objectives. The Sierra
17 Club has been actively working in California and elsewhere to address the serious threats to public
18 health and the environment related to the lack of oversight and safeguards for oil drilling and
19 fracking activities.

20 14. By this action, Petitioners seek to protect the health, welfare, environmental,
21 conservation, economic and other interests of their members, which will be adversely affected by
22 DOGGR’s permitting of oil drilling and fracking operations, and continued activity at these
23 operations. In addition, Petitioners and their members seek to enforce a public duty owed to them by
24 DOGGR. Petitioners and their members have a right to, and a beneficial interest in, DOGGR’s
25 performance of its duties under CEQA. Unless the relief requested in this case is granted, they will
26 continue to be adversely affected and irreparably injured by DOGGR’s failure to comply with the
27 law.

1 20. The South Belridge Oil Field sits in the southwestern sector of the San Joaquin
2 Valley, which is plagued by a host of environmental and health problems. The San Joaquin Valley
3 has some of the worst air quality in the nation – the area is in extreme non-attainment for federal
4 ozone standards, and has high levels of particulate matter pollution. The area has one of the highest
5 rates of childhood asthma in the state, and air pollution also results in other negative respiratory and
6 cardiovascular effects. Water sources in the San Joaquin Valley are heavily contaminated – some
7 25% of small community water systems in the San Joaquin Valley are in violation of health-based
8 drinking water standards, including standards for arsenic and nitrates. The San Joaquin Valley also
9 has some of the highest rates of poverty and unemployment in the state of California.

10 21. McKittrick, Lost Hills and Buttonwillow are the towns closest to the South Belridge
11 Oil Field, and are approximately 13, 10 and 16 miles (respectively) from the borders of the oil field.
12 These towns are ranked as amongst the most-polluted communities in the state. According to the
13 California Environmental Protection Agency’s environmental health screening tool,
14 CalEnviroScreen, McKittrick, Lost Hills and Buttonwillow are ranked in the 95th, 88th, and 92nd
15 percentiles for overall pollution burdens.¹ These communities already suffer from high levels of
16 exposure to toxic chemicals from industrial facilities (McKittrick is in the 72nd percentile), exposure
17 to hazardous waste (they are ranked, respectively, in the 94th, 92nd and 85th percentiles), and some
18 of the most polluted drinking water in the state (they are ranked, respectively, in the 90th, 98th, and
19 96th percentiles).

20 22. These communities are also vulnerable due to socioeconomic factors. Some 70
21 percent of McKittrick is unemployed. The towns of Lost Hills and Buttonwillow have majority
22 Latino populations (93 percent and 63 percent), a sizable proportion of whom live below the poverty
23 line (96 percent and 60 percent), are considered linguistically isolated (99 percent and 73 percent),
24 and have less than a high school education (100 percent and 86 percent).

25
26 ¹ CalEnviroScreen considers several factors (exposures and environmental effects of pollution
27 burdens, sensitive populations, socioeconomic factors) when calculating a community’s
28 CalEnviroScreen score. “100” is the highest possible score, and the higher the percentage score, the
worse the burdens in a community.

1 23. Operations in the Belridge Oil Field also affect other sensitive populations. The
2 Belridge Elementary School sits on the western border of the South Belridge Oil Field. It has
3 approximately 35 students, some 80 percent of whom are Hispanic and/or Latino. Children are
4 especially susceptible to air pollution and its health consequences, and are more likely to be affected
5 than adults by other environmental harms.

6 24. Like other communities in Kern County, the towns surrounding the Belridge Oil Field
7 are also severely affected by California’s ongoing drought. The state is entering its fourth year of
8 drought, and 2014 is the driest year on record since 1977. In January 2014, Governor Jerry Brown
9 declared a State of Emergency, calling upon state water agencies to develop coordinated water
10 conservation and drought management plans, and asking residents to reduce water consumption by
11 20 percent. In an April 2014 press release regarding State Water Project (“SWP”) allocations to
12 Kern County, the Kern County Water Agency stated that even with additional water from the SWP,
13 “water storage in the State’s major reservoirs and runoff projections remain well below average,”
14 and that “the overall picture is still bleak.”

15 **B. Effects of Oil Production Activities**

16 25. DOGGR’s issuance of the drilling permit allows the well to be drilled and oil to be
17 produced. Today production can include techniques like steam injection, fracking, and acidization,
18 which DOGGR calls “enhanced oil recovery” and “well stimulation.” Production activities create a
19 host of environmental and health harms and risks, including air pollution, water pollution, and the
20 need to dispose of the massive quantities of toxic wastewater that accompanies the production.

21 26. Steam injection is a method applied to heavy-oil reservoirs to boost oil recovery.
22 During the process, the operator injects steam at very high temperature and pressure into the well.
23 The well is then closed, allowing the steam to heat up the surrounding formation, which thins the
24 heavy-oil so that it can more easily flow toward, through, and out of the well. Operators will often
25 repeat this cycle of inject-soak-and-produce until the response becomes marginal. Repeated steam
26 injection creates some of the harshest conditions to which a well can be subjected. The process is
27 known to result in a particularly high rate of well failure and to cause the ground to shift and
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1 collapse. Upon information and belief, steam injection is commonly used in the Belridge Oil Field.
2 In fact, in April 2014, the San Joaquin Valley Unified Air Pollution Control District approved
3 permits which would allow Aera Energy to construct a 100 MMBtu/hr steam generator, and allow
4 the continued operation of other steam generators, to be used in steam injection of wells.

5 27. Fracking is a technique which pushes a mix of highly pressurized water, chemicals,
6 and “proppants” (such as sand, ceramic pellets, or other particles used to keep fractures open) into
7 wells, in order to induce fractures in the surrounding rock, allowing oil and gas to flow more freely
8 into the production well. Other well stimulation techniques include: “matrix acidization,” which
9 uses water, sand, and high volumes of acid and other chemicals to corrode the rock surrounding a
10 well and allow access to oil and gas; and “water injection” or “water flooding,” which injects water
11 in the well reservoir, to increase pressure and stimulate production in the well. Fracking is used in
12 the Belridge Oil Field, as is water flooding.

13 28. Drilling, well stimulation, and other oil production activities all cause a range of
14 harmful environmental and health effects.

15 29. Various aspects of oil drilling result in the release of air pollutants and greenhouse
16 gases. The engines used during oil drilling, for processes such as pumping and steam generation,
17 and the trucks used for transportation of materials used in the drilling process and extracted oil, all
18 release harmful air pollutants and greenhouse gases. High amounts of methane – the gas traps 86
19 times more heat than carbon dioxide over 20 years – can leak into the atmosphere as oil and gas are
20 pumped out of the ground. Oil drilling may also result in land and surface water contamination
21 through spills, leaks, accidents, or improper handling of chemicals onsite.

22 30. Fracking a well creates additional sources of air pollution, including volatile organic
23 compounds (“VOCs”) and other hazardous air pollutants. VOCs can react in the atmosphere to form
24 ozone and particular matter, which can cause respiratory ailments such as asthma and bronchitis,
25 heart attacks, and even premature death. Such impacts are particularly acute in the San Joaquin
26 Valley and Los Angeles air basins, which already experience some of the worse air pollution in the
27 nation. EPA has found that some of the largest air pollution emissions in the natural gas industry
28 occur as wells that have been fracked are prepared for production. During the flowback stage of

1 well completion, fracking fluids, water, and reservoir gas come to the surface at a high velocity and
2 volume. This mixture includes a large amount of VOCs and methane along with air toxics such as
3 benzene, ethylbenzene, and n-hexane. Ancillary equipment used in fracking operations, such as
4 diesel trucks and generators, can also be a significant source of air pollution.

5 31. Oil drilling can also cause the release of toxic chemicals, such as benzene, toluene,
6 ethylbenzene, xylene, radioactive materials, hydrogen sulfide, arsenic and mercury. The
7 hydrocarbons extracted from the ground during oil production can contain heavy metals such as
8 lead, mercury, and arsenic. The extracted petroleum also includes polycyclic aromatic hydrocarbons
9 (PAHs), some of which are carcinogenic or otherwise harmful to human health. The water used
10 during oil drilling and produced during the drilling process may contain salts, toxic metals and other
11 substances, and must be disposed of properly to protect groundwater sources and prevent unwanted
12 exposure to the contaminated water.

13 32. Exposure to toxic substances associated with oil and gas activity results in significant
14 adverse health effects, including respiratory, cardiovascular, neurologic, and pulmonary illnesses,
15 damage to the nervous system, immune system, and endocrine system, increased rates of birth
16 defects and cancer, and harm to eyes, skin, and other sensory organs.

17 33. Fracking and other well stimulation techniques have also been linked with adverse
18 environmental and health effects. According to an April 2011 report from the U.S. House of
19 Representatives, oil and gas companies between 2005 and 2009 used fracking products containing
20 29 chemicals that are: (1) known or possible human carcinogens, (2) regulated under the federal Safe
21 Drinking Water Act, 42 U.S.C. § 300f *et seq.*, for their risks to human health, or (3) listed as
22 hazardous air pollutants under the federal Clean Air Act, 42 U.S.C. § 7401 *et seq.* In addition, at
23 least one chemical used in the fracking operations at South Belridge Oil Field, ethylene glycol, is
24 listed under California's Proposition 65 program based on its potential to cause reproductive and
25 developmental harm. The sand used as a proppant in many of the Belridge Oil Field wells contains
26 crystalline silica ("silica") a known health hazard. The transport and use of sand to stimulate wells
27 produces clouds of silica dust which if inhaled by workers, can cause serious health effects,
28 including lung cancer and silicosis. Finally, other well stimulation techniques, like matrix

1 acidization, rely on toxic acids such as hydrofluoric and hydrochloric acid, which can cause
2 inflammation of the respiratory tract, eye and skin damage, and can be fatal.

3 34. Given the use of such chemicals, as well as the release of other naturally-occurring
4 substances from rock formations, the contamination of domestic and agricultural water supplies from
5 oil production is a major concern. Such contamination can occur through several different
6 mechanisms. For example, if a well bore is not properly sealed and cased, chemicals and other
7 materials can escape as they move through the well. Spills of chemicals used in production can
8 occur on the surface during storage and transportation activities. Wastewater is often disposed of
9 through underground injection wells, posing a further risk of contamination. In July 2014, DOGGR
10 ordered the emergency shut-down of 11 oil and gas waste injection sites, and ordered the
11 investigation of nearly 100 other sites, due to concerns about contamination of protected aquifers.

12 35. Oil production often requires use of large volumes of fresh water. Most of the water
13 injected underground is either not recovered or is unfit for domestic or agricultural use when it
14 returns to the surface, and must be treated and disposed of. Water usage is already a major issue in
15 California, which is in the midst of a severe drought and suffers from water shortages. Not only can
16 water withdrawals for oil production directly affect the availability of water for other uses, but it can
17 also indirectly impact water supplies by mobilizing naturally-occurring contaminants, causing land
18 subsidence, or promoting bacterial growth. At least 144 of Aera Energy's newly permitted wells in
19 the South Belridge Oil Field draw water from fresh water supplied by the California Aqueduct, or
20 from Aera's own wells.

21 36. The disposal of the vast quantities of wastewater left behind when the oil is extracted
22 poses additional risks and harms. As noted above, the wastewater is often injected into disposal
23 wells, where it can contaminate aquifers. Wastewater is also often stored in open pits, from which it
24 can leach into groundwater, and where it creates additional harmful air pollution, through the
25 evaporation of volatile organic compounds and other substances. On information and belief, these
26 types of disposal pits are used to contain wastewater from the South Belridge Oil Field, and are
27 located on the southern border of the field.

1 37. Recent evidence has also found that the underground injection of wastewater
2 resulting from drilling and fracking operations can induce seismic activity, a serious concern in
3 California. In June 2012, the National Research Council of the National Academies of Science
4 released a report finding that the injection of wastewater for disposal poses a risk of causing seismic
5 events. In recent years, a number of earthquakes in Arkansas, Ohio, Oklahoma, and Texas have
6 been linked to wastewater disposal associated with oil and gas production. In addition, a recent
7 study from the British Columbia Oil and Gas Commission found that fluid injection during hydraulic
8 fracturing in proximity to pre-existing faults resulted in dozens of seismic events in the Horn River
9 Basin of northeast British Columbia between 2009 and 2011.

10 38. Oil production is an intense industrial activity which requires large number of vehicle
11 trips, grading and disturbance of habitat, and creates many other environmental harms, including
12 risks to wildlife. While the landscape of the South Belridge Oil Field has been severely damaged, it
13 still provides habitat for the endangered San Joaquin kit fox and other plants and wildlife. In
14 addition, the California Department of Fish and Wildlife, Lokern Ecological Reserve – an area
15 intended to conserve rare plants, animals, and habitats, as well as to provide areas for education and
16 scientific research – is located a few miles south of the field’s southern border.

17 **C. DOGGR’s Regulation of Oil and Gas Activity**

18 39. DOGGR, an agency within the California Department of Conservation, has extensive
19 authority to regulate activities associated with oil and gas production in California, including the
20 subsurface injection of fluids, and issues permits for the drilling of new wells and reworking old
21 ones.

22 40. Under Public Resources Code Section 3106(a), DOGGR is required to “supervise the
23 drilling, operation, maintenance, and abandonment of wells and the operation, maintenance, and
24 removal or abandonment of tanks and facilities attendant to oil and gas production...so as to prevent,
25 as far as possible, damage to life, health, property, and natural resources; damage to underground oil
26 and gas deposits from infiltrating water and other causes; loss of oil, gas, or reservoir energy, and
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1 damage to underground and surface waters suitable for irrigation or domestic purposes by the
2 infiltration of, or the addition of, detrimental substances.”

3 41. DOGGR is required by its regulations to “protect health, safety, welfare, and the
4 environment.” (Cal. Code Regs. Tit. 14, §1721). In order to further these goals, DOGGR has the
5 authority to take measures such as requiring operators to put monitoring programs in place, to detect
6 spills into the soil and water, and determine the optimal well-spacing needed to “protect health,
7 safety, welfare, or the environment.” (Pub. Res. Code §3106(c), Cal. Code Regs. Tit. 14 §§1721,
8 1721.7).

9 42. In order to drill or rework an oil or gas well in California, permits are typically
10 needed from both DOGGR and a local agency, depending on where the well is located. Additional
11 permits may also be needed from the U.S. Bureau of Land Management (for wells on federal lands),
12 and the State Lands Commission (for wells on state lands). In addition, DOGGR serves as the lead
13 agency for CEQA purposes for all wells located in Kern County, where some 80% of the oil wells in
14 the state of California are located.

15 43. Where operators intend to use “well stimulation treatments” like hydraulic fracturing,
16 they must also provide advance notice to DOGGR, and well stimulation may only commence after
17 DOGGR has provided its approval. (Pub. Res. Code. §3160, §3161).

18 44. Enhanced oil recovery techniques, including steam injection and water flooding, also
19 require an Underground Injection Control (“UIC”) Program permit. The UIC Program regulates
20 injection wells used in oil and gas production, and was intended to protect underground sources of
21 drinking water. DOGGR regulates these wells in California, yet despite its discretionary authority
22 over the program, it does not conduct CEQA review prior to issuing UIC permits.

23 **D. Required Environmental Review**

24 45. In permitting oil and gas wells in California, DOGGR has a nondiscretionary duty to
25 comply with the statutory and regulatory requirements of the California Environmental Quality Act.
26 (Pub. Res. Code §21080(a), Cal. Code Regs. Tit. 14 §§1681 *et seq.*)
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1 46. The California Environmental Quality Act, Public Resources Code §§ 21000-21177,
2 is a comprehensive statute designed to provide for long-term protection of the environment. In
3 enacting CEQA, the state Legislature declared its intention that all public agencies responsible for
4 regulating activities affecting the environment give prime consideration “to preventing
5 environmental damage, while providing a decent home and satisfying living environment for every
6 Californian.” (Pub. Res. Code § 21000(g).)

7 47. One of the fundamental purposes of the CEQA process is to provide the decision-
8 makers and the public in general with detailed information about the impacts a proposed project will
9 likely have on the environment, in order to allow them to balance the project’s benefits against its
10 environmental costs, consider appropriate mitigation measures, and properly weigh other
11 alternatives.

12 48. Public agencies approving a project that is not subject to an exemption must prepare
13 an initial study to determine whether the project might have a significant impact on the environment.
14 If agencies determine a project might have a significant impact, a full EIR is required; alternatively,
15 if agencies determine that no significant impact will occur, a negative declaration may be issued.
16 (CEQA Guidelines §§ 15365, 15363(c)(5).)

17 49. CEQA requires each state agency to prepare an EIR when it proposes to approve or
18 carry out a discretionary project that may have a significant impact on the environment, and to
19 mitigate or avoid those significant impacts whenever feasible to do so. (Pub. Res. Code §§ 21002.1,
20 21061, 21080(a).)

21 50. In preparing an EIR, agencies must define “project” in a manner that requires
22 consideration of “the whole of an action,” and may not divide a single project into individual
23 subprojects to avoid responsibility for considering the environmental impact of the project as a
24 whole. (CEQA Guidelines § 15378, Pub. Res. Code § 21605). The term “project” is given a broad
25 interpretation in order to maximize protection of the environment.

26 51. In preparing an EIR, the discussion of significant environmental impacts “should
27 include relevant specifics of the area, the resources involved, physical changes, alterations to
28 ecological systems, and changes induced in population distribution, population concentration, the

1 human use of the land (including commercial and residential development), health and safety
2 problems caused by the physical changes, and other aspects of the resource base such as water,
3 historical resources, scenic quality, and public services.” (Cal. Code Regs. tit. 14, § 15126.2(a).)

4 52. An EIR must also identify feasible mitigation measures in order to substantially
5 lessen or avoid otherwise significant environmental effects. (Pub. Res. Code §§ 21002, 21081(a);
6 Cal. Code Regs. tit. 14, § 15126.4(a).)

7 53. In addition, CEQA requires DOGGR to consider and evaluate the cumulative impacts
8 of a project when the project’s incremental effects are “cumulatively considerable.” (Pub. Res. Code
9 § 21083(b)(2); Cal. Code Regs. tit. 14, § 15130(a).) “Cumulatively considerable” means that “the
10 incremental effects of an individual project are significant when viewed in connection with the
11 effects of past projects, the effects of other current projects, and the effects of probable future
12 projects.” (Pub. Res. Code § 21083(b)(2); Cal. Code Regs. tit. 14, § 15065(a)(3).)

13 54. California’s Water Code has provisions which complement CEQA’s requirements for
14 conducting environmental review. The Water Code requires a lead agency performing CEQA
15 review for any “industrial project” “occupying more than 40 acres of land, or having more than
16 650,000 square feet of floor area,” or “that would demand an amount of water equivalent to, or
17 greater than, the amount of water required by a 500 dwelling unit project,” to disclose the water
18 supply for the project, and take measures to determine whether the water supply will be adequate to
19 meet the projected needs of the project. (Water Code §10912, §10910).

20 55. Despite the great number of wells permitted in recent months, DOGGR has not
21 complied with CEQA or the Water Code’s requirements for conducting environmental review, for
22 any of its recently issued permits in the South Belridge Oil Field.

23 **E. Recent Permit Approvals**

24 56. From July 29, 2014 to the present date, DOGGR issued Permits to Conduct Well
25 Operations to Aera Energy to drill 214 new wells in South Belridge Oil Field. DOGGR has
26 approved Interim Well Stimulation Treatment Notices, allowing fracking, for 144 of these wells. A
27 list of these wells, including their A.P.I. numbers, is attached as Exhibit C to this Petition.
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1 57. DOGGR has not required environmental review of any of these wells. DOGGR has
2 failed to consider, for example, how drilling and operation of these wells would affect local air
3 quality, whether the wells would increase greenhouse gas emissions, whether they would release
4 toxic chemicals, whether they would strain scarce water supplies, and whether they would harm
5 protected species such as the San Joaquin kit fox.

6 58. The permits issued by DOGGR to Aera Energy authorize drilling in the Diatomite
7 and Tulare zones of the South Belridge Oil Field. The permits allow for all types of extraction
8 methods, including fracking, water flooding, and steam injection.

9 59. Aera Energy has provided Interim Well Stimulation Treatment Notices, as required
10 by law, stating that it will be fracking at least 144 of its newly permitted wells. The water
11 management plan provided along with these notices indicates that the water for hydraulic fracturing
12 will be drawn from “either the California Aqueduct via Aera’s connection to the Belridge Water
13 Storage District or from Aera-owned water source wells.” (*See e.g.*, Interim Well Stimulation
14 Treatment Notice for Well A.P.I. No. 030-55641, referenced in Exhibit C). Aera Energy anticipates
15 needing a maximum of 4,800 barrels (201,600 gallons) of fresh water for each well stimulation
16 treatment. (*Id.*) It does not intend to use recycled water for the well stimulation treatments. (*Id.*)
17 The water remaining after the well stimulation treatment will be used for the next job, or passed
18 through a water treatment facility and transported to Aera Energy’s permitted Class II disposal wells.
19 (*Id.*) According to these estimates, all together, fracking these wells could use 30,240,000 gallons or
20 approximately 93 acre feet of water, drawn from the California Aqueduct or local water resources.

21 60. Water will be used in other drilling and production activities (such as conventional
22 drilling, water flooding, and steam injection), but DOGGR has not provided any information about
23 the expected water use in these types of drilling permits.

24 61. DOGGR has the discretion to modify permit conditions in furtherance of
25 environmental protection and public health and safety. Here, DOGGR has used this discretion to
26 require distinct permit conditions for individual wells, including, but not limited to:

- 27 a. The use of blowout prevention equipment meeting particular specifications;
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- b. Requiring a mechanical integrity test of the well after drilling has commenced;
- c. Requiring a directional survey after the completion of drilling;
- d. Requiring permission to be obtained before flaring or blowing gas;
- e. Requiring additional safety precautions for areas with hydrogen sulfide gas present;
- f. DOGGR has also revised permit conditions for the new wells, after receiving Supplementary Notices of drilling from Aera Energy, changing the safety specifications required for particular wells.

62. On September 24, 2014, Petitioners submitted a Public Records Act request to DOGGR, seeking any documents pertaining to environmental review of permits for the South Belridge Oil Field, undertaken pursuant to the California Environmental Quality Act, from June 1, 2014 to the present. On October 29, 2014, Petitioners were informed by DOGGR’s chief counsel that there were no responsive documents. Based on this response, Petitioners understand that DOGGR has not conducted any CEQA review for the permits listed in Appendix C issued to Aera Energy in the South Belridge Oil Field.

V. CAUSE OF ACTION

(Violation of CEQA – Failure to Comply with CEQA)

63. Petitioners re-allege, as if fully set forth herein, each and every allegation contained in the preceding paragraphs.

64. DOGGR issues an approval prior to any drill, redrill, or rework of an oil or gas well. (14 Cal. Code Regs. § 1714.) The approval and issuance of a permit to drill is a “discretionary” action subject to the requirements of CEQA. (Pub. Res. Code §§ 20165, 21080.)

65. Thus, in permitting oil and gas wells in California, DOGGR has a nondiscretionary duty to comply with the statutory and regulatory requirements of the California Environmental Quality Act. (Pub. Res. Code §21080(a), Cal. Code Regs. Tit. 14 §§1681 *et seq.*)

66. No exemptions to CEQA are applicable.

1 67. Therefore, at a minimum, DOGGR must prepare an initial study to evaluate whether
2 the project will have significant effects, including but not limited to: a description of the project's
3 environmental setting, information identifying the project's environmental effects, and a discussion
4 of ways to mitigate the project's significant effects. (CEQA Guidelines §§ 15063(d).)

5 68. DOGGR failed to conduct an initial study prior to approving and issuing each Notice
6 of Intent to Drill for every one of Aera Energy's wells listed in Exhibit C. Further, DOGGR failed
7 to consider the combined environmental effects of the drilling and operation of the newly permitted
8 wells. The failure to conduct an initial study for each one of these wells, and the failure to consider
9 the combined effects of these wells, is a violation of CEQA and constitutes a prejudicial abuse of
10 discretion for failure to proceed in a manner required by law. (Pub. Res. Code § 21168.5.)

11 **VI. REQUEST FOR RELIEF**

12 Wherefore, Petitioners demand entry of judgment as follows:

13 1. Petitioners seek a writ of mandate issued under the seal of this Court directing
14 DOGGR to:

- 15 a. Comply with CEQA for each and every drilling permit listed in Exhibit C;
- 16 b. Conduct and complete environmental review of the impacts of wells listed in
17 Exhibit C, pursuant to the requirements of CEQA, including, but not limited
18 to, considering air and toxics impacts, conducting a comprehensive analysis of
19 the water needs of the wells, and considering the cumulative impacts of the
20 wells;
- 21 c. Set aside and withdraw its approvals of the drilling permits issued to Aera
22 Energy that are listed in Exhibit C;
- 23 d. Refrain from granting any further approvals to Aera Energy of well drilling,
24 redrilling, or rework activity in the South Belridge Oil Field until DOGGR
25 complies with CEQA for these wells. No new permits shall be issued for new
26 proposed wells, until CEQA review is conducted for those wells.

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- 2. Award Petitioners' fees and costs, including reasonable attorneys' fees and expert witness costs, as authorized by CCP § 1021.5 and any other applicable provisions of law.
- 3. Grant such other legal and equitable relief as this Court deems appropriate and just.

Respectfully submitted,



DATED: November 12, 2014

IRENE V. GUTIERREZ
WILLIAM B. ROSTOV
EARTHJUSTICE
50 California Street, Suite 500
San Francisco, CA 94111
T: (415) 217-2000
F: (415) 217-2040

Attorneys for Petitioners

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VERIFICATION

I, Gordon Nipp, hereby declare:

I am the Vice Chair of the Kern-Kaweah chapter of the Sierra Club, a non-profit corporation with offices in San Francisco, California and elsewhere in the United States. The facts alleged in the above Petition are true to my personal knowledge and belief.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct and that this verification is executed on this 11 th day of November 2014 at Bakersfield, California.

Gordon F. Nipp

EXHIBIT A



November 10, 2014

VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Mr. Bruce Reeves
Chief Counsel
Department of Conservation
801 K Street, 24th Floor
Sacramento, CA 95814
(916)323-6733

Re: Notice of Intent to File California Environmental Quality Act Petition

Dear Mr. Reeves:

PLEASE TAKE NOTICE, under Public Resources Code section 21167.5, that the Association of Irrigated Residents, Center for Biological Diversity, and the Sierra Club (“Petitioners”), intend to file a verified petition for writ of mandate against the Department of Conservation, Division of Oil, Gas and Geothermal Resources (“DOGGR”), challenging DOGGR’s recent approvals of Aera Energy LLC oil drilling permits in the South Belridge Oil Field.

The petition will be filed in Kern County Superior Court on November 12, 2014. It will allege that DOGGR violated the California Environmental Quality Act (“CEQA”) in its recent approvals of oil drilling permits in the South Belridge Oil Field, and will seek a writ of mandate directing DOGGR to comply with CEQA, set aside the drilling permits recently issued to Aera Energy, and refrain from granting further approvals to Aera Energy until it complies with CEQA.

Sincerely,

Irene Gutierrez
Will Rostov
Counsel for Petitioners

PROOF OF SERVICE

I, John Wall, hereby declare:

I am over the age of 18 years, not a party to this action, and employed by Earthjustice in the County of San Francisco, State of California. My business and mailing address is 50 California Street, Suite 500, San Francisco, California 94111.

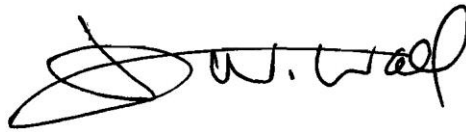
On November 10, 2014, I served a copy of the following document described as:

Notice of Intent to File California Environmental Quality Act Petition

by addressing the envelope as set forth below, placing a true and correct copy of the above mentioned document in a sealed envelope with postage affixed hereon fully prepaid in the United States mail following this organization's ordinary practices with which I am readily familiar.

Mr. Bruce Reeves
Chief Counsel
Department of Conservation
801 K Street, 24th Floor
Sacramento, CA 95814

I declare under penalty of perjury of the laws of the California that the foregoing is true and correct and that this was executed on November 10, 2014 in San Francisco, California.

A handwritten signature in black ink, appearing to read "J. Wall", written over a horizontal line.

John W. Wall

EXHIBIT B

1 WILLIAM B. ROSTOV, State Bar No. 184528
2 IRENE V. GUTIERREZ, State Bar No. 252927
3 EARTHJUSTICE
4 50 California Street, Suite 500
5 San Francisco, CA 94111
6 T: (415) 217-2000
7 F: (415) 217-2040

8 *Attorneys for Petitioners, Association of Irrigated Residents,*
9 *Center for Biological Diversity, and Sierra Club*

10 IN THE SUPERIOR COURT FOR THE STATE OF CALIFORNIA
11 FOR THE COUNTY OF KERN

12 ASSOCIATION OF IRRITATED RESIDENTS,
13 CENTER FOR BIOLOGICAL DIVERSITY,
14 and SIERRA CLUB, non-profit corporations,

15 Petitioners,

16 vs.

17 CALIFORNIA DEPARTMENT OF
18 CONSERVATION, DIVISION OF OIL, GAS,
19 AND GEOTHERMAL RESOURCES, and DOES I
20 through C, inclusive,

21 Respondents.

) Case No.:

)
) **NOTICE TO ATTORNEY GENERAL**
) **OF THE STATE OF CALIFORNIA**
) **OF PETITION FOR WRIT OF**
) **MANDATE**

)
) (Cal. Code of Civil Procedure §§ 1085,
) Cal. Public Resources Code §§ 21167 and
) 21168.5)

1 To the Attorney General of the State of California:

2 PLEASE TAKE NOTICE, under Public Resources Code § 21167.7 and Code of Civil
3 Procedure § 388, that on November 12, 2014, the Association of Irrigated Residents, Center for
4 Biological Diversity, and the Sierra Club (“Petitioners”), filed a verified petition for writ of mandate
5 against the Department of Conservation, Division of Oil, Gas and Geothermal Resources
6 (“DOGGR”), challenging DOGGR’s recent approvals of Aera Energy LLC oil drilling permits in the
7 South Belridge Oil Field. A copy of the petition will be provided with this notice.

8 The petition alleges that DOGGR violated the California Environmental Quality Act
9 (“CEQA”) in its recent approvals of oil drilling permits in the South Belridge Oil Field, and will
10 seek a writ of mandate directing DOGGR to comply with CEQA, set aside the drilling permits
11 recently issued to Aera Energy, and refrain from granting further approvals to Aera Energy until it
12 complies with CEQA.

13
14 Sincerely,

15 

16
17 DATED: November 12, 2014

18 _____
19 IRENE V. GUTIERREZ
20 WILLIAM ROSTOV
21 EARTHJUSTICE
22 50 California Street, Suite 500
23 San Francisco, CA 94111
24 T: (415) 217-2000
25 F: (415) 217-2040

26 Attorneys for Petitioners
27
28

PROOF OF SERVICE

I, John Wall, hereby declare:

I am over the age of 18 years, not a party to this action, and employed by Earthjustice in the County of San Francisco, State of California. My business and mailing address is 50 California Street, Suite 500, San Francisco, California 94111.

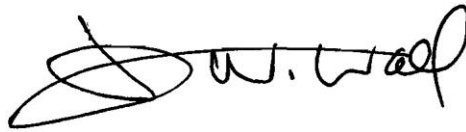
On November 12, 2014, I served a copy of the following documents described as:

**Notice to Attorney General of the State of California of Petition for Writ of Mandate
and
Verified Petition for Writ of Mandate**

by addressing the envelope as set forth below, placing a true and correct copy of the above mentioned document in a sealed envelope with postage affixed hereon fully prepaid in the United States mail following this organization's ordinary practices with which I am readily familiar.

Office of the Attorney General
1300 "I" Street
Sacramento, CA 95814-2919

I declare under penalty of perjury of the laws of the California that the foregoing is true and correct and that this was executed on November 12, 2014 in San Francisco, California.



John W. Wall

EXHIBIT C

Item No.	API_No	Interim Well Stimulation		
		Permit to Operate	Supplemental Permit to Operate	Treatment Notice
1	030-55554	7/29/2014	10/8/2014	N/A
2	030-55555	7/29/2014	10/8/2014	N/A
3	030-55556	7/29/2014	10/8/2014	N/A
4	030-55557	7/29/2014	10/8/2014	N/A
5	030-55558	7/29/2014	10/8/2014	N/A
6	030-55559	7/29/2014	10/8/2014	N/A
7	030-55560	7/29/2014	10/8/2014	N/A
8	030-55561	7/29/2014	10/8/2014	N/A
9	030-55562	7/29/2014	10/8/2014	N/A
10	030-55610	7/30/2014	N/A	9/25/2014
11	030-55611	7/30/2014	N/A	9/25/2014
12	030-55612	7/30/2014	N/A	9/25/2014
13	030-55613	7/30/2014	N/A	9/25/2014
14	030-55614	7/30/2014	N/A	9/25/2014
15	030-55615	7/30/2014	N/A	9/25/2014
16	030-55616	7/30/2014	N/A	9/25/2014
17	030-55617	7/30/2014	N/A	9/25/2014
18	030-55618	7/30/2014	N/A	9/25/2014
19	030-55622	8/4/2014	N/A	9/25/2014
20	030-55623	8/4/2014	N/A	9/25/2014
21	030-55624	7/30/2014	N/A	9/25/2014
22	030-55625	8/4/2014	N/A	9/25/2014
23	030-55626	8/4/2014	N/A	9/25/2014
24	030-55627	8/4/2014	N/A	9/25/2014
25	030-55628	8/4/2014	N/A	9/25/2014
26	030-55629	7/30/2014	N/A	10/14/2014
27	030-55630	7/30/2014	N/A	8/26/2014
28	030-55631	7/30/2014	N/A	8/26/2014
29	030-55632	7/30/2014	N/A	8/26/2014
30	030-55633	7/30/2014	N/A	8/26/2014
31	030-55634	7/30/2014	N/A	8/26/2014
32	030-55635	8/4/2014	N/A	9/25/2014
33	030-55636	8/4/2014	N/A	9/25/2014
34	030-55637	8/4/2014	N/A	9/25/2014
35	030-55638	7/30/2014	N/A	8/26/2014
36	030-55639	8/4/2014	N/A	9/25/2014
37	030-55640	7/30/2014	N/A	8/26/2014
38	030-55641	8/4/2014	N/A	8/22/2014
39	030-55642	8/4/2014	N/A	8/22/2014
40	030-55643	8/4/2014	N/A	8/22/2014
41	030-55644	8/4/2014	N/A	8/22/2014
42	030-55645	8/4/2014	9/12/2014	9/18/2014
43	030-55646	8/4/2014	9/12/2014	9/18/2014
44	030-55647	8/4/2014	9/12/2014	9/18/2014
45	030-55648	8/4/2014	9/12/2014	9/18/2014
46	030-55649	8/4/2014	9/12/2014	9/18/2014
47	030-55650	8/4/2014	N/A	8/22/2014
48	030-55651	8/4/2014	N/A	8/22/2014
49	030-55652	8/4/2014	N/A	8/22/2014
50	030-55653	8/4/2014	N/A	8/26/2014
51	030-55654	8/4/2014	N/A	8/26/2014
52	030-55657	7/30/2014	9/12/2014	9/18/2014
53	030-55658	7/30/2014	9/12/2014	9/18/2014
54	030-55659	7/30/2014	9/12/2014	9/18/2014
55	030-55660	7/30/2014	9/12/2014	9/18/2014
56	030-55661	7/30/2014	9/12/2014	9/18/2014

Item No.	API_No	Interim Well Stimulation		
		Permit to Operate	Supplemental Permit to Operate	Treatment Notice
57	030-55683	8/11/2014	9/12/2014	9/18/2014
58	030-55684	Date Unknown	N/A	9/18/2014
59	030-55685	8/11/2014	N/A	9/18/2014
60	030-55686	8/11/2014	9/12/2014	9/18/2014
61	030-55687	8/11/2014	9/12/2014	9/18/2014
62	030-55688	8/11/2014	9/12/2014	9/18/2014
63	030-55689	8/11/2014	9/12/2014	9/18/2014
64	030-55690	8/11/2014	9/12/2014	9/18/2014
65	030-55704	8/13/2014	N/A	8/26/2014
66	030-55705	8/13/2014	N/A	8/26/2014
67	030-55706	8/13/2014	N/A	8/26/2014
68	030-55707	8/13/2014	N/A	8/26/2014
69	030-55708	8/13/2014	N/A	8/26/2014
70	030-55709	8/13/2014	N/A	8/26/2014
71	030-55710	8/13/2014	N/A	8/26/2014
72	030-55711	8/13/2014	N/A	9/2/2014
73	030-55712	8/13/2014	N/A	9/2/2014
74	030-55713	8/13/2014	N/A	9/2/2014
75	030-55714	8/13/2014	N/A	9/2/2014
76	030-55715	8/13/2014	N/A	9/2/2014
77	030-55716	8/13/2014	N/A	9/2/2014
78	030-55717	8/13/2014	N/A	9/2/2014
79	030-55718	8/13/2014	N/A	9/2/2014
80	030-55785	8/18/2014	N/A	9/8/2014
81	030-55786	8/18/2014	N/A	9/8/2014
82	030-55787	8/18/2014	N/A	9/8/2014
83	030-55788	8/18/2014	N/A	9/9/2014
84	030-55789	8/18/2014	N/A	9/9/2014
85	030-55790	8/18/2014	N/A	9/9/2014
86	030-55791	8/18/2014	N/A	9/9/2014
87	030-55792	8/18/2014	N/A	9/9/2014
88	030-55793	8/18/2014	N/A	9/9/2014
89	030-55794	8/18/2014	N/A	9/9/2014
90	030-55841	8/29/2014	N/A	9/17/2014
91	030-55908	8/28/2014	9/12/2014	N/A
92	030-55909	8/28/2014	9/12/2014	9/17/2014
93	030-55910	8/28/2014	9/12/2014	9/17/2014
94	030-55911	8/28/2014	N/A	9/17/2014
95	030-55927	8/28/2014	9/12/2014	9/17/2014
96	030-55929	8/28/2014	9/12/2014	9/17/2014
97	030-55932	8/28/2014	N/A	9/17/2014
98	030-55934	8/28/2014	N/A	9/17/2014
99	030-55935	8/28/2014	N/A	9/17/2014
100	030-55983	8/30/2014	N/A	N/A
101	030-55984	9/3/2014	N/A	10/29/2014
102	030-55985	9/3/2014	N/A	10/29/2014
103	030-55986	9/3/2014	N/A	10/29/2014
104	030-55988	9/3/2014	N/A	10/29/2014
105	030-55989	9/3/2014	N/A	10/29/2014
106	030-55990	9/3/2014	N/A	10/29/2014
107	030-55991	9/3/2014	N/A	10/29/2014
108	030-55992	9/3/2014	N/A	10/29/2014
109	030-56004	9/3/2014	N/A	10/29/2014
110	030-56017	9/3/2014	N/A	10/16/2014
111	030-56018	9/3/2014	N/A	10/16/2014
112	030-56019	9/3/2014	N/A	10/29/2014

Item No.	API_No	Permit to Operate	Supplemental Permit to Operate	Interim Well Stimulation	
				Treatment Notice	
113	030-56020	9/3/2014	N/A		10/29/2014
114	030-56021	9/3/2014	N/A		10/29/2014
115	030-56022	9/3/2014	N/A		10/29/2014
116	030-56023	9/3/2014	N/A		10/29/2014
117	030-56024	9/3/2014	N/A		N/A
118	030-56025	9/3/2014	N/A		N/A
119	030-56026	9/3/2014	N/A		N/A
120	030-56027	9/3/2014	N/A		N/A
121	030-56028	9/3/2014	N/A		N/A
122	030-56029	9/3/2014	N/A		N/A
123	030-56030	9/3/2014	N/A		N/A
124	030-56031	9/3/2014	N/A		N/A
125	030-56032	9/3/2014	N/A		N/A
126	030-56033	9/3/2014	N/A		N/A
127	030-56034	9/3/2014	N/A		N/A
128	030-56144	9/12/2014	N/A		N/A
129	030-56145	9/12/2014	N/A		N/A
130	030-56146	9/12/2014	N/A		N/A
131	030-56147	9/12/2014	N/A		N/A
132	030-56148	9/12/2014	N/A		N/A
133	030-56149	9/12/2014	N/A		10/29/2014
134	030-56150	9/12/2014	N/A		10/29/2014
135	030-56152	9/11/2014	N/A		N/A
136	030-56153	9/11/2014	N/A		N/A
137	030-56154	9/11/2014	N/A		N/A
138	030-56155	9/15/2014	N/A		N/A
139	030-56156	9/15/2014	N/A		N/A
140	030-56171	9/16/2014	N/A		N/A
141	030-56172	9/16/2014	N/A		N/A
142	030-56173	9/22/2014	N/A		N/A
143	030-56174	9/16/2014	N/A		N/A
144	030-56175	9/16/2014	N/A		N/A
145	030-56176	9/16/2014	N/A		N/A
146	030-56177	9/16/2014	N/A		N/A
147	030-56178	9/16/2014	N/A		N/A
148	030-56179	9/16/2014	N/A		N/A
149	030-56180	9/16/2014	N/A		N/A
150	030-56181	9/16/2014	N/A		N/A
151	030-56182	9/16/2014	N/A		N/A
152	030-56183	9/16/2014	N/A		N/A
153	030-56184	9/16/2014	N/A		N/A
154	030-56185	9/16/2014	N/A		N/A
155	030-56186	9/16/2014	N/A		N/A
156	030-56187	9/16/2014	N/A		N/A
157	030-56188	9/16/2014	N/A		N/A
158	030-56189	9/16/2014	N/A		N/A
159	030-56190	9/16/2014	N/A		N/A
160	030-56205	9/19/2014	N/A		N/A
161	030-56206	9/19/2014	N/A		N/A
162	030-56207	9/19/2014	N/A		N/A
163	030-56208	9/19/2014	N/A		N/A
164	030-56209	9/19/2014	N/A		N/A
165	030-56210	9/19/2014	N/A		N/A
166	030-56211	9/19/2014	N/A		N/A
167	030-56212	9/19/2014	N/A		N/A
168	030-56216	9/19/2014	N/A		10/10/2014

Item No.	API_No	Permit to Operate	Supplemental Permit to Operate	Interim Well Stimulation	
				Treatment Notice	
169	030-56217	9/19/2014	N/A		10/10/2014
170	030-56218	9/19/2014	N/A		10/10/2014
171	030-56219	9/19/2014	N/A		10/10/2014
172	030-56220	9/19/2014	N/A		10/10/2014
173	030-56221	9/19/2014	N/A		10/10/2014
174	030-56222	9/19/2014	N/A		10/10/2014
175	030-56223	9/19/2014	N/A		10/10/2014
176	030-56224	9/19/2014	N/A		10/10/2014
177	030-56225	9/19/2014	N/A		10/10/2014
178	030-56226	9/19/2014	N/A		10/10/2014
179	030-56227	9/19/2014	N/A		10/10/2014
180	030-56236	9/22/2014	N/A		10/16/2014
181	030-56237	9/22/2014	N/A		10/16/2014
182	030-56238	9/22/2014	N/A		10/16/2014
183	030-56239	9/22/2014	N/A		10/17/2014
184	030-56240	9/22/2014	N/A		10/17/2014
185	030-56241	9/22/2014	N/A		10/17/2014
186	030-56242	9/22/2014	N/A		10/17/2014
187	030-56243	9/22/2014	N/A		10/17/2014
188	030-56244	9/22/2014	N/A		10/17/2014
189	030-56245	9/22/2014	N/A		10/17/2014
190	030-56246	9/22/2014	N/A		10/17/2014
191	030-56247	9/22/2014	N/A		10/17/2014
192	030-56248	9/22/2014	N/A		10/13/2014
193	030-56249	9/22/2014	N/A		10/10/2014
194	030-56250	9/22/2014	N/A		10/13/2014
195	030-56251	9/22/2014	N/A		10/13/2014
196	030-56252	9/20/2014	N/A		10/13/2014
197	030-56253	9/22/2014	N/A		10/15/2014
198	030-56258	9/30/2014	N/A		N/A
199	030-56259	9/30/2014	N/A		10/15/2014
200	030-56260	9/30/2014	N/A		10/15/2014
201	030-56261	9/30/2014	N/A		10/15/2014
202	030-56262	9/30/2014	N/A		10/15/2014
203	030-56263	9/30/2014	N/A		10/15/2014
204	030-56264	9/30/2014	N/A		10/15/2014
205	030-56287	10/3/2014	N/A		N/A
206	030-56298	10/6/2014	N/A		N/A
207	030-56299	10/6/2014	N/A		N/A
208	030-56300	10/6/2014	N/A		N/A
209	030-56301	10/6/2014	N/A		N/A
210	030-56302	10/6/2014	N/A		N/A
211	030-56303	10/6/2014	N/A		N/A
212	030-56304	10/6/2014	N/A		N/A
213	030-56357	10/10/2014	N/A		10/27/2014
214	030-56358	10/10/2014	N/A		N/A