

**CALIFORNIA STATE LANDS  
COMMISSION**

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*Established in 1938*

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June 9, 2023

Venoco Liquidating Trust  
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**Subject: End of the Police Powers Emergency at the Ellwood Onshore Facility**

Since 2017, the California State Lands Commission, on behalf of the State of California, has been present on the Ellwood Onshore Facility ("EOF"), at 7979 Hollister Avenue, Goleta. The Commission's emergency presence was necessitated by the exceptionally high concentrations of Hydrogen Sulfide ("H<sub>2</sub>S") laden gases emanating from the 30 wells on Platform Holly. The Commission's occupation of the EOF to abate the threat of oil and gas being released from the site, which threatened human health and safety, was in furtherance of its police powers and performed as an ongoing emergency until the platform's wells could be plugged to regulatory standards, as confirmed by the U.S. Bankruptcy Court for the District of Delaware (Eugene Davis v. State of California, U.S. Bank. Ct. Dist. Del., Case No. 18-50908).

On May 31, 2023, the Commission declared the end of both the H<sub>2</sub>S emergency and the Commission's justified use of the EOF. The 30 wells on Platform Holly have been plugged and isolated from the oil and H<sub>2</sub>S gas bearing strata and the gas and oil pipeline between the platform to shore has been purged and blinded. The EOF is incapable of receiving oil or gas from Platform and the EOF is no longer being used to treat oil or gas from any source. The Commission was asked to extend its presence at the EOF from May 31, 2023 to June 9, 2023. The Commission and its agents, Beacon West Energy, vacated the EOF at 12:14 pm PST on June 9, 2023.

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During its emergency occupation of the EOF, the Commission operated the facility in compliance with all regulatory and permitting requirements. A listing of actions the Commission undertook in anticipation of the end of its occupation of the EOF can be found in the attached document "Ellwood Onshore Facility Handover Status," dated June 9, 2023. This letter and the Handover Status document are intended as informational items and are provided as a courtesy. Additionally, these items provide notice to the Trustee of the Venoco Liquidating Trust and the broader community that the Commission has deemed the emergency over and that it has left the premises.

Sincerely,

DocuSigned by:

*Seth Blackmon*

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Seth Blackmon

Chief Counsel