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Attorneys for Cross-Defendant
AERA ENERGY LLC

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

SANTA BARBARA CHANNELKEEPER,
a California non-profit corporation,

Petitioner,

v.

STATE WATER RESOURCES CONTROL
BOARD, etc., et al.,

Respondent.

CITY OF SAN BUENAVENTURA, etc.,

Cross-Complainant,

v.

DUNCAN ABBOTT, an individual, et al.,

Cross-Defendants.

Case No. 19STCP01176

Judge: Honorable William F. Highberger

**INITIAL DISCLOSURES (CCP § 842)
OF CROSS-DEFENDANT AERA
ENERGY LLC (ERRONEOUSLY SUED
AS AERA ENERGY, LCC)**

Action filed: September 19, 2014

Trial Date: Not Set

Pursuant to Code of Civil Procedure Code of Civil Procedure section 842 subd. (a), Cross-Defendant Aera Energy LLC ("AERA") hereby submits its initial disclosures. AERA reserves the right to supplement this disclosure in the future as may be needed pursuant to Code of Civ. Proc. section 842, subd. (d)(1)- (3).

INITIAL DISCLOSURES

(1) The name, address, telephone number, and email address of the party and, if applicable, the party's attorney.

Aera Energy LLC
10000 Ming Avenue
Bakersfield, CA 93311

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(2) The quantity of any groundwater extracted from the basin by the party and the method of measurement used by the party or the party's predecessor in interest for each of the previous 10 years preceding the filing of the complaint.

In the 10 years preceding the filing of the Cross-Complaint, AERA has not extracted groundwater from the (1) Upper Ventura River Groundwater Basin (Department of Water Resources' ("DWR") Bulletin 118, Groundwater Basin Number 4-3.01); (2) Ojai Valley Groundwater Basin (DWR's Bulletin 118, Groundwater Basin Number 4-2); (3) Lower Ventura River Groundwater Basin (DWR's Bulletin 118, Groundwater Basin Number 4-3.02); and (4) Upper Ojai Valley Groundwater Basin (DWR's Bulletin 118, Groundwater Basin Number 4-1) (collectively, the "Groundwater Basins"). AERA only operates petroleum production-related wells that extract or inject fluids, including waters from or into, formations that are significantly

1 deeper than the Groundwater Basins. Such formations are limited to exempted aquifers that are
2 not underground sources of drinking water in accordance with the Safe Drinking Water Act, 42
3 U.S.C. 300(f) et seq., or are otherwise determined to be an "exempted aquifer" pursuant to 40
4 C.F.R. section 146.4 and the California Public Resources Code section 3131. *See Non-USDW*
5 *Aquifer Demonstration Injection Zone With TDS >10,000 MG/L, Ventura Oil Field, AERA*
6 *Energy LLC (March 21, 2016).*

7
8 **(3) The type of water right or rights claimed by the party for the extraction of groundwater.**

9 At present, AERA does not claim water rights for the extraction of groundwater from the
10 Groundwater Basin as it currently understands the Groundwater Basins to be defined.

11
12 **(4) A general description of the purpose to which the groundwater has been put.**

13 N/A

14
15 **(5) The location of each well or other source through which groundwater has been**
16 **extracted.**

17 N/A

18
19 **(6) The area in which the groundwater has been used.**

20 N/A

21
22 **(7) Any claims for increased or future use of groundwater.**

23 None, subject to AERA's current understanding of the definition of the Groundwater
24 Basins.

25
26 **(8) The quantity of any beneficial use of any alternative water use that the party claims as**
27 **its use of groundwater under any applicable law, including, but not limited to, Section**
1005.1 , 1005.2 , or 1005.4 of the Water Code.

28 N/A

1 **(9) Identification of all surface water rights and contracts that the party claims**
2 **provides the basis for its water right claims in the comprehensive adjudication.**

3 AERA does not claim surface water rights with regard to Ventura River Watershed.

4 **(10) The quantity of any replenishment of water to the basin that augmented the basin's**
5 **native water supply, resulting from the intentional storage of imported or non-native water**
6 **in the basin, managed recharge of surface water, or return flows resulting from the use of**
7 **imported water or non-native water on lands overlying the basin by the party, or the party's**
8 **representative or agent, during each of the 10 calendar years immediately preceding the**
9 **filing of the complaint.**

10 N/A

11 **(11) The names, addresses, telephone numbers, and email addresses of all persons**
12 **possessing information that supports the party's disclosures.**

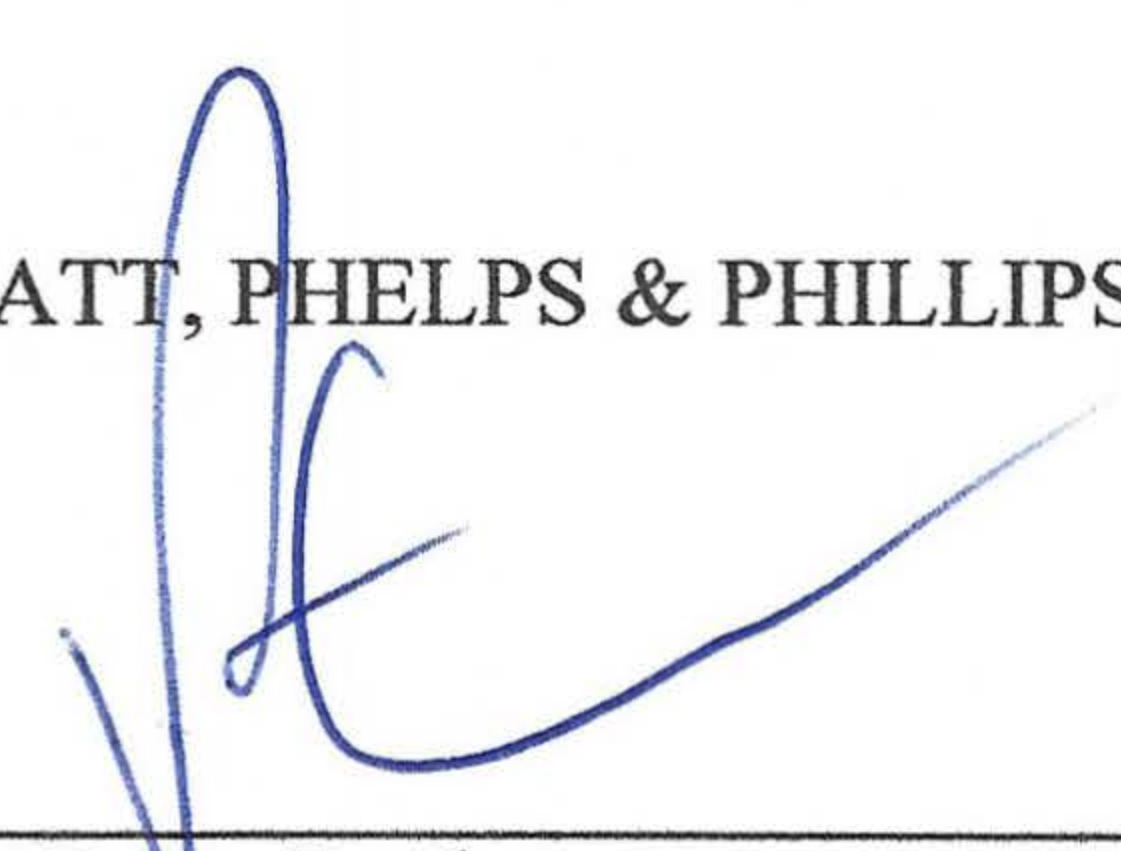
13 William Spear
14 John Stevens
15 Aera Energy LLC
16 10000 Ming Avenue
17 Bakersfield, CA 93311

18 **(12) Any other facts that tend to prove the party's claimed water right.**

19 N/A

20 Dated: May 24, 2021

MANATT, PHELPS & PHILLIPS, LLP

21 By: 
22 Peter Duchesneau
23 Attorneys for Cross-Defendant
24 Aera Energy LLC

25 400138092.1

VERIFICATION

I, William J. Spear III, declare as follows:

I am the Ventura Manager of Operations for Aera Energy Inc. I am authorized to make this verification for and on Aera Energy Inc.'s behalf, and I make this verification for that reason.

I have read **INITIAL DISCLOSURES (CCP § 842) OF CROSS-DEFENDANT AERA ENERGY LLC (ERRONEOUSLY SUED AS AERA ENERGY, LCC)** and know its contents.

I am informed and believe and on that ground allege that the matters stated in it are true.

This verification was executed on the 24 day of May, 2021, in Ventura, California.



1 **PROOF OF SERVICE**

2 I, Mayra Medellin, declare as follows:

3 I am employed in Los Angeles County, Los Angeles, California. I am over the age
4 of eighteen years and not a party to this action. My business address is MANATT, PHELPS &
5 PHILLIPS, LLP, 2049 Century Park East, Suite 1700, Los Angeles, California 90067. My
electronic notification address is mmedellin@manatt.com

6 On May 27, 2021, I served on the interested parties in said action the within:

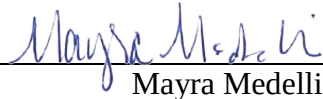
7 **INITIAL DISCLOSURES (CCP § 842) OF CROSS-DEFENDANT AERA**
8 **ENERGY LLC (ERRONEOUSLY SUED AS AERA ENERGY, LCC)**

9 as stated below:

10 ☒ By transmission via E-Service to File & Express as listed on the File & Express service list.

11 I declare under penalty of perjury under the laws of the State of California that the
12 foregoing is true and correct.

13 Executed on May 27, 2021, at Los Angeles, California.

14
15 
16 _____
Mayra Medellin

17 400207224.1