

CALIFORNIA COASTAL COMMISSION

ENERGY, OCEAN RESOURCES AND FEDERAL CONSISTENCY

455 MARKET STREET, SUITE 300

SAN FRANCISCO, CA 94105-2421

VOICE (415) 904-5200

WEB: WWW.COASTAL.CA.GOV



Th8a

CC-0001-26 (DCOR)

August 13, 2026

CORRESPONDENCE

Received Before 4 p.m. on August 7, 2026



August 7, 2026

Chair Meagan Harmon
California Coastal Commission
455 Market Street, Suite 300
San Francisco, California 94105

Subject: Agenda Item Th8a – Consistency Certification No. CC-0001-26
DCOR L.L.C. Platform Gilda Development and Production Plan Update: Well Stimulation Activities

Chair Harmon and Members of the Commission:

Thank you for your consideration of DCOR L.L.C.'s request for a Consistency Certification for its Development and Production Plan (DPP) Update for Platform Gilda. The proposed DPP Update would authorize DCOR to perform well stimulation treatments on up to 16 wells on Platform Gilda over a five-year program (the "Program").

As background, DCOR is a privately owned company headquartered in Oxnard, California. We own and operate 20 of California's 27 offshore oil and gas platforms, including 9 platforms that DCOR manage on behalf of the State of California, and three of the major energy companies who continues to retain assets in the region. California itself, via the State Lands Commission, and these energy companies entrust DCOR with operating their assets because of our proven operational experience and longstanding commitment to safety and regulatory compliance.

The Program presented relies exclusively on the platform's existing process equipment, flow lines, and seafloor pipelines. It does not involve construction of any new offshore platforms, installation of any new export pipelines, expansion of the existing production facilities, or any seafloor disturbance. By improving reservoir permeability, the Program is expected to increase Platform Gilda's oil production from approximately 1,100 barrels to approximately 4,000 barrels of oil per day and to support recovery of approximately 14

million barrels of oil and 13 million cubic feet of natural gas over the next 20 years, using existing infrastructure that DCOR has operated consistent with the Commission's 1980 concurrence in Consistency Certification No. CC-6-80.

The Program advances a well-established national interest in producing reliable, domestic energy. The Outer Continental Shelf Lands Act (OCSLA) recognizes that oil and gas reserves beneath the Outer Continental Shelf (OCS) constitute a "vital national resource" whose development is to proceed "to the extent consistent with the national interest," and that coastal states have the right to participate in OCS decisions "to the extent consistent with the national interest." 43 U.S.C. § 1332(3), (4)(C). Consistent with that framework, DCOR's DPP Update explains that the Program is needed to maintain Platform Gilda's offshore production levels "to support the national interest in reducing dependence on foreign energy sources, efficiently increasing domestic production and conserving resources," (DPP Update at p. 1-1) consistent with Executive Orders 14154 and 14156. Continuing to produce from Platform Gilda's existing, permitted infrastructure allows a portion of California's energy needs to be met locally and domestically, under long-standing federal and state safety and environmental oversight. DCOR views the Program not only as a means of improving recovery from its existing lease, but as a contribution to the broader national interest by securing a responsibly produced and regulated domestic energy supply. See 16 USC 1451(j) (CZMA national objective of attaining a greater degree of energy self-sufficiency advanced by expanded energy activity).

Engagement with Commission Staff

DCOR initiated informal discussions with Commission Staff earlier this year to exchange background information about DCOR's operations and the specifics of its application. In addition to the DPP Update application and the associated Environmental Impact Statement (EIS), DCOR provided Commission staff a comprehensive description of the Program, including the scope of the proposed activities and the safeguards in place and planned to protect the platform, associated pipelines, and the marine environment.

Throughout this exchange, DCOR provided prompt, complete, and transparent responses to staff over the course of the review process.

We believe this engagement demonstrated DCOR's long-standing commitment to safety, environmental stewardship, and responsible operations. DCOR continues to assert that the Program as proposed is fully consistent with the California Coastal Management Program (CCMP) and the Coastal Zone Management Act (CZMA).

While DCOR appreciates the engagement with Staff early in the process, DCOR was not given an opportunity to discuss Staff's concerns or provide additional information requirements before the Staff Report was released.

As explained below, the Staff recommendation extends well beyond a focused analysis of the proposed DPP Update, and instead addresses Platform Gilda's existing operations, and offshore oil production generally, in ways that are not germane to this consistency certification.

This letter addresses certain issues raised in the Staff Report and recent public comments, and respectfully requests that the Commission approve Consistency Certification No. CC-0001-26.

Scope of Review

DCOR's principal objection to the Staff Report is that the Commission Staff's review is not limited to evaluating the coastal effects of the specific activity for which DCOR seeks consistency certification — the addition of a narrowly tailored program of well stimulation treatments (frac packing) to 16 wells — but instead opines on the entirety of Platform Gilda's ongoing, already-authorized operations and existing infrastructure. The Commission concurred with the consistency certification for the installation and operation of Platform Gilda, including its offshore pipeline, in 1980 (Consistency Certification No. CC-6-80). DCOR's existing operations have continued under that concurrence, and under ongoing Bureau of Safety and Environmental Enforcement (BSEE), Bureau of Ocean Energy Management (BOEM), and, as applicable, State oversight, ever since. The DPP Update at issue here does not propose any new platforms, pipelines, or seafloor disturbance; it proposes only the addition of an established and defined well stimulation technique.

Notwithstanding the limited scope of DCOR's application, the Staff Report repeatedly grounds its objection on characteristics of Platform Gilda's existing infrastructure and operations. The objection is unrelated to the incremental effects of the Program to address

the adequacy of Platform Gilda’s existing operational infrastructure, spill response capabilities, and seismic design – matters that are features of the platform’s current operations under existing, previously concurred-with authorizations, and not consequences of the proposed DPP Update. For example, the Staff Report’s spill-risk analysis relies heavily on the “residual risk of accidental releases associated with continued offshore oil production and transportation” and on the platform’s “aging infrastructure” generally, rather than on the discrete effects of the proposed well stimulation activities themselves. (Staff Report at p. 22–25.)

The Coastal Act and California Coastal Management Program direct Staff to evaluate the reasonably foreseeable effects of the proposed activity — the addition of well stimulation treatments — not to re-adjudicate the consistency of operations and infrastructure that the Commission already reviewed and approved and that remain subject to continuous, independent regulatory oversight. By grounding its objection primarily in these generalized concerns, rather than the specific, incremental effects of the Program, the Staff Report exceeds the appropriate scope of this consistency certification review.

To be clear, if the DPP Update is not approved, DCOR will continue to operate Platform Gilda under its existing federal lease and approved DPP. The platform, pipelines, and associated infrastructure will remain in service. The spill risk profile staff identifies in connection with the characterization of “aging infrastructure” exists independently of this application. The proposed DPP Update does not create the infrastructure conditions Staff analyzes.

Response to Staff’s Coastal Act Section 30232 Findings

Commission Staff’s objection under Coastal Act Section 30232 rests on two related findings: that the Program’s intensified and extended use of Platform Gilda’s “aging infrastructure” would increase the residual risk of an accidental spill, and that DCOR has not demonstrated that effective containment and cleanup would be available should a spill occur. (Staff Report at p. 22–39.) DCOR addresses below several of the specific findings in the Staff Report, both to correct the record where Staff’s characterization of DCOR’s submissions is incorrect and to identify the substantial areas of agreement between DCOR and Commission Staff regarding the safety and environmental protections associated with the proposed activities.

Platform Lifecycle and Future Production

The Program does not extend Platform Gilda's operational life beyond the timeframe already contemplated by the existing federal lease OCS-P 0216 and approved DPP. The platform operates under a federal mineral lease with no fixed termination date and can remain in service so long as it is producing. As evaluated in the EIS, the proposed well stimulation activities are projected to support the production of approximately 14 million barrels of oil and 13 million cubic feet of natural gas over the next 20 years. The projected peak production rate of approximately 4,000 barrels per day is well below both the originally approved production level of 14,000 barrels per day under the 1980 DPP and Platform Gilda's historical peak production of 7,915 barrels per day. As such, the proposed activities would operate well within the production parameters contemplated by the original authorization.

One clarification regarding the record: the Staff Report relies on the "cease sooner" language from DCOR's DPP Update (DPP Update at p. 3-2) to argue that the Program's "primary purpose" is to "extend the economic life of the platform and associated infrastructure." (Staff Report at p. 21.) But that language refers to a comparison with the "No Action" alternative, in which DCOR simply continues existing operations without pursuing any other means of developing the reservoir. A non-concurrence does not mean that Platform Gilda's operational lifespan will be curtailed.

DCOR is currently able to pursue non-fracking development, potentially in parallel with the Project, which would recover additional reserves consistent methods already authorized DPP. **Rejecting this consistency certification would not preclude conventional development, and continued production would not necessarily end sooner as a result.**

Staff's objection rests on the premise that the Program extends the platform's productive life and compounds environmental risk by prolonging the use of "aging infrastructure". But as noted above, the platform would continue to operate under its existing authorizations. The platform has operated safely under continuous federal and state oversight, and Staff's own review of DCOR's structural integrity program found no deficiencies that would preclude continued operation. (Staff Report at p. 22.)

Spill Prevention and Response

The Staff Report concludes that the Program is inconsistent with Coastal Act Section 30232 because it would extend production using “aging infrastructure” without demonstrating that effective spill containment and cleanup would be available. (Staff Report at p. 22–39.) The record does not support this conclusion.

DCOR’s Oil Spill Response Plan (OSRP), **approved by the California Department of Fish and Wildlife’s Office of Spill Prevention and Response in November 2025 and determined by BSEE in March 2026 to comply with applicable federal requirements**, establishes the response framework that would govern any spill. The OSRP includes response strategies for a range of discharge events, equipment inventories, resource deployment protocols, and shoreline protection measures designed to minimize environmental impacts and support rapid response.

Platform Gilda is also covered by the California Area Contingency Plans/Notifications (ACP), a collaborative planning framework involving more than 50 federal, state, local, industry, and environmental organizations that provides detailed geographic response strategies for coastal regions throughout California.

These protections exist today and would remain in place under the Program. The leak detection technology is state-of-the-art, and the system worked as intended during DCOR’s December 2021 Pipeline 0919 incident identified by the Staff Report. The Program does not change the risk profile: the same approved response plans would apply regardless of whether the DPP Update is approved.

The Staff Report’s treatment of Worst Case Discharge (WCD) volumes warrants clarification. The WCD is a mechanism to design spill response capabilities to ensure that an operator has adequate spill response capabilities to respond to the largest conceivable oil spill from their facilities, including vessels, tanks, and piping on board platforms, pipelines and loss of well control events. The largest worst case discharge volume is calculated as the release of stored oil on a platform, oil in the associated pipeline, plus the total flow released from a loss of well control up to the drilling of a relief well.

The California Office of Spill Prevention and Response (OSPR) regulations and federal BSEE regulations both have their own formulas for a total facility WCD and both values are included in DCOR’s OSRP. The approved WCD discharge volumes already account for the

proposed Program’s activity and no increase in WCD volume is required for the Program, as was identified to staff in supporting documentation provided by DCOR. (DCOR July 9, 2026 Response at p. 4–5) Specifically, a stimulated well flowrate is already included in the WCD calculation. The Program does not involve any changes to on-platform tanks or equipment, so that component of the WCD remains unchanged. And while higher than current average production is projected, the pipeline component of the WCD is based on the unchanging physical volume of the pipeline and the maximum capacity of the existing shipping pumps—which is larger than the projected post-stimulation flowrates from the Program. Additionally, the potential for a discharge at the magnitude of a WCD is small given the geology and reservoir characteristics in the area. (2023 Biological Assessment at 44; EIS Section 2.3.)

Staff acknowledges that DCOR’s prevention measures “reduce the likelihood of accidental releases” (Staff Report at p. 26) and that Section 30232 contemplates that “accidental spills may occur despite engineering controls and operational safeguards” (Staff Report at p. 26). The comprehensive preventative systems already in place, together with the approved OSRP and Area Contingency Plan¹, demonstrate that DCOR can effectively implement feasible prevention and response measures under realistic operating conditions consistent with Section 30232.

Moreover, Commission Staff’s analysis appears to conflate two distinct requirements. Section 30232 of the Coastal Act requires “[p]rotection against the spillage” of hazardous substances “shall be provided” and “[e]ffective containment and cleanup facilities and procedures shall be provided for accidental spills that do occur.” The statute thus establishes two requirements: (i) that spill protection be provided; and (ii) that effective containment and clean-up facilities and procedures be provided. It does not require a guarantee that no potential release will ever occur — a standard no offshore oil production facility, including those with Commission-concurred consistency certifications currently in operation, could satisfy.

Finally, Commission Staff actively participates in the development and review of both OSRPs and Area Contingency Plans/Notifications (ACPs). These plans are regularly updated to incorporate evolving best practices, and before they are approved or amended,

¹ The OSRP was previously provided to Commission Staff on July 9, 2026, as was the CDFW link to the ACP: <https://wildlife.ca.gov/OSPR/Contingency#acp>.

Commission Staff has the opportunity to participate in the review process and raise concerns. Staff has long had this opportunity, and has apparently never attempted to impose a “no spill guarantee” requirement; plans have continued to receive approval from the agencies charged with overseeing oil spill prevention and response.

Operational Safety

The Staff Report questions whether DCOR’s inspection, maintenance, and operational control programs are sufficient to minimize the risk of accidental releases from “aging infrastructure”. (Staff Report at p. 24–27.) The record demonstrates that they are.

At DCOR, operational safety is a core value and fundamental operating principle. The company has established an exemplary safety record through rigorous maintenance programs, safety management programs, comprehensive employee training, and a culture of continuous improvement.

BSEE conducts regular inspections of Platform Gilda and its associated pipelines. Most recently, BSEE concluded that both the platform and pipelines were in full compliance with all applicable federal regulations. See 30 CFR part 254.

DCOR's Pipeline Leak Detection System (LDS) provides continuous, real-time monitoring of pipeline integrity and operating conditions. The system evaluates flow and pressure data across each pipeline segment using equipment calibrated to specific operating characteristics. Automated pressure-monitoring safeguards are integrated with shutdown valves designed to immediately isolate and shutdown pipeline segments in the event of abnormal operating conditions.

The proposed well stimulation operation also incorporates multiple engineered safeguards. A closed-loop system will be utilized to contain all stimulation fluids produced during flowback. These fluids will remain within Platform Gilda's existing piping and processing systems before being injected into existing water-disposal wells and into established reservoirs located more than one mile beneath the seafloor.

Commission Staff reviewed the numerous operational controls DCOR designed and would implement to address the potential for accidental releases during well stimulation activities and stated that these safeguards “include standardized operating procedures,

personnel training requirements, closed-loop handling of stimulation fluids and flowback monitoring during stimulation operations, emergency shutdown procedures, and other operational safeguards incorporated into the proposed project. Commission Staff has reviewed these operational measures and finds that they represent appropriate operational controls for the proposed fracking activities.” (Staff Report at p. 22.)

Additionally, the staff report incorrectly states that the DDP Update does not address an effective response to “a large spill of fracking fluids.” (Staff Report at p. 31.) The EIS, which the staff report references, contains a thorough discussion of the components of well stimulation fluids that will be used, including a table listing the key additives, their concentrations for each treatment and a discussion of potential impacts in the event of accidental release. (EIS at Sections 2.6 and 4.2.3.3)

Over 95 percent of the fluid is sea water. The next two largest components are guar and a borate crosslinker which together comprise only 1.5 percent of the 55,450 gallons (453,924 pounds) of the combined volume of the sea water and those additives that would be used during any one treatment. Nevertheless, “a large spill of fracking fluids” would primarily be a release of sea water into the ocean, with concentrations of additives that would too small to be toxic. (Staff Report at p. 31.) For these reasons, the biological assessments prepared for the U.S. Fish & Wildlife Service and National Marine Fisheries Service concerning well stimulation on the Outer Continental Shelf have concluded that the limited amounts of additives in “fracking fluid” are so small and would be so quickly diluted in an ocean environment that they do not impose any threat to the marine resources.

Response to Staff’s Reliance on Oil Spill Incidents

The Staff Report implies that DCOR’s OSRP is somehow ineffective. (Staff Report at p. 27–39.) The Staff Report asserts that “DCOR’s facilities have been involved in two of the three most significant offshore spill incidents that have occurred off of California in the past five years,” citing the December 2021 Pipeline 0919 oil spill and the May 2026 Platform Habitat fire. (Staff Report at pp. 24–25.) Staff further asserts that “many of the measures proposed to be implemented as part of the project to protect against spills are the same as those in place on these other facilities” (Staff Report at p. 25) and that the “OSRP does not effectively address” environmental conditions in the Santa Barbara Channel setting and

“does not include techniques and equipment that have been sufficiently enhanced and improved beyond those that proved ineffective during other recent offshore spills. While effective cleanup and containment equipment and methods may exist, those proposed to be used by the Applicant as part of the current project have not been demonstrated to meet that standard.” (Staff Report at p. 43.) These comparisons are inept and do not support the conclusion that the Program poses an elevated risk.

Pipeline 0919. The December 2021 Pipeline 0919 incident involved a pinhole leak in an 8-inch produced fluid pipeline caused by localized internal corrosion. This pipeline connected Platform Eva to DCOR’s Fort Apache onshore facility in Huntington Beach—a geographically and operationally distinct system from Platform Gilda and its associated infrastructure. The leak was detected by DCOR’s monitoring systems, and approximately four barrels were released before the line was isolated. The spill was contained and cleaned up promptly. This incident did not involve the 12-inch oil export pipeline that serves Platform Gilda. Subsequent repair was authorized by the Commission through Coastal Development Permit No. 9-22-0219. The characterization of this incident as among “the three most significant offshore spill incidents in the past five years” warrants clarification given the actual volume and nature of the release. Rather, prompt identification and resolution of this spill is evidence that DCOR’s spill response technology and plans work as intended.

Platform Habitat. The May 2026 Platform Habitat incident is even less instructive. The incident involved an unplanned release of natural gas resulting in a short-lived fire (no oil release), from a platform that was no longer in active production and was undergoing decommissioning activities. (Staff Report at p. 25.) A coordinated response was rapidly undertaken by DCOR along with local, State and Federal agencies resulting in the fire being extinguished within hours and DCOR’s trained personnel reboarding the platform, demonstrating DCOR’s ability to respond to emergency incidents. The staff report does not explain how an incident on a non-operational facility undergoing decommissioning, which involved no discharge to the ocean, no pipeline failure and no injuries, is predictive of risk at an active, continuously inspected production platform.

Two other spills identified by Staff did not involve DCOR-owned or operated facilities.

The 2021 Huntington Beach Pipeline Spill. The 2021 Huntington Beach pipeline spill (Amplify Energy/Beta Unit) was attributed by the National Transportation Safety Board to

contact from container ship anchors that were repeatedly dragged across the underwater pipeline. **As the BOEM EIS notes, “[t]here is no indication that age of infrastructure on the Pacific OCS contributed to recent oil spills in the region.”** (EIS at p. 2-4.) This incident is not analogous to the spill scenarios associated with the current project and does not support a conclusion that Platform Gilda’s infrastructure poses an elevated risk.

2015 Refugio Spill. The Refugio Spill involved a leak from an *onshore* pipeline owned by Plains All American Pipeline L.P. with which DCOR had no involvement. This pipeline had a fundamentally different construction, design, and operating environment than Platform Gilda’s seafloor oil export pipeline. It is therefore also not analogous or predictive of risk related to the Program at an offshore production platform under the jurisdiction of federal authorities.

More fundamentally, the Staff Report’s argument again exceeds the scope of the proposal at issue. The relevant inquiry under Section 30232 is whether the applicant has demonstrated adequate safeguards for *this* project—and the record shows that DCOR has done so. Staff’s own analysis acknowledges that DCOR’s operational controls “represent appropriate operational controls for the proposed fracking activities” (Staff Report at p. 22) and that DCOR’s prevention measures “reduce the likelihood of accidental releases.” (Staff Report at p. 26). The prior incidents cited by Staff do not alter that conclusion.

Well Integrity

The Staff Report implies that well integrity failure is a “reasonably common problem” for oil and gas wells and that “the risk of integrity failure remains, particularly given the age of the well infrastructure.” (Staff Report at p. 25.) This concern overlooks DCOR’s rigorous testing protocol and the regulatory safeguards already in place.

DCOR has committed to implementing a rigorous well testing regimen before any well stimulation activities occur. In addition to formal approvals by BOEM and BSEE for a future Application for Permit to Modify (APM), the regimen includes casing and liner pressure testing, verification of mechanical integrity, and confirmation of well barrier isolation. An independent registered professional engineer will also verify and certify each casing program for compliance with 30 CFR 250.420 before stimulation may proceed. (DPP Update at p. 2-13.)

Based on the recommended testing regimen, DCOR believes—and Commission Staff concurred by stating in their **Staff Report: “that the proposed pressure levels during fracking would be well within the structural integrity tolerances for the wells and associated pipelines that would be used.”** (Staff Report at p. 25.) Furthermore, Commission staff recognized “that these well specific integrity requirements provide an important layer of regulatory oversight before stimulation activities may occur.” (Staff Report at p. 22.)

Seismic Considerations and Geologic Conditions

The Staff Report raises concerns about seismic hazards, including both the potential for induced seismicity from well stimulation activities and the risk that natural earthquakes could damage “aging infrastructure”. (Staff Report at p. 56–62.) The record demonstrates that these risks are appropriately managed.

There were no induced seismic events reported during or following 28 federally approved offshore stimulation treatments conducted between 1986 and 2014. Similarly, no well-integrity-related seismic events were reported during or after those stimulation activities. The current proposal provides for the fluids generated during these well stimulation activities to be reinjected into existing, deep, pressure-depleted, high-capacity reservoirs. Additionally, the proposed stimulation intervals are located at significant distances from mapped Quaternary faults, eliminating the potential for interactions with active fault structures. The Staff Report likewise acknowledges that the planned treatment zones are located more than 2,500 feet from the nearest fault and more than two miles from the nearest active faults, and recites the EIS’s conclusion that, absent a migration pathway, “there is no mechanism by which stimulation fluids or hydrocarbons could migrate along fault planes to shallow sediments or the seabed.” (Staff Report at pp. 56–57.)

Structural Integrity

The Staff Report expresses concern that Platform Gilda’s infrastructure is over 45 years old and has been in use “decades beyond” its originally anticipated operating life. (Staff Report at p. 21–22.) But this statement ignores the actual conditions of the platform. As mentioned above, BSEE has inspected the platform and deems it structurally sound and in compliance with its existing safety regulations.

Platform Gilda was constructed in 1981 and is subject to a rigorous maintenance program. BSEE regularly conducts highly detailed and thorough inspections of Platform Gilda and its associated pipelines. BSEE concluded this year that both the platform and pipelines are in compliance with all applicable federal regulations. Importantly, DCOR's offshore facilities are visited by regulatory agencies upwards of 20 times annually. These include federal, state, and local agencies that routinely inspect the facility for structural and safety conditions. These inspections have not resulted in any determination of unsafe working conditions or a condition that threatens the environment.

It should be noted that the Staff Report states that Commission Staff “reviewed information documenting Platform Gilda’s structural integrity management program, including routine structural inspections, periodic engineering evaluations, and continuing inspection and maintenance activities conducted pursuant to Bureau of Safety and Environmental Enforcement (BSEE) requirements. These materials do not identify structural deficiencies that would indicate a heightened spill risk or preclude continued operation of Platform Gilda for the proposed fracking operations.” (Staff Report at p. 22.)

The Staff Report continues to describe DCOR’s integrity management protocols for the pipelines serving the platform by stating: “Commission staff also reviewed information provided by the Applicant regarding the integrity management program for the oil and natural gas pipelines serving Platform Gilda. The submitted materials describe a comprehensive inspection and maintenance program that includes corrosion monitoring and mitigation, leak detection systems, routine maintenance, engineering assessments, and continuing regulatory oversight by BSEE, the California State Lands Commission (SLC), and the Pipeline and Hazardous Materials Safety Administration (PHMSA). The ongoing implementation of this pipeline integrity management program would reduce the likelihood of accidental releases associated with the proposed project and resulting continued operation of the offshore platform and associated pipelines.” (Staff Report at p. 22.)

Any suggestion that Platform Gilda is improperly maintained or cannot safely continue operating under current or proposed conditions is not supported by the record. Like any major infrastructure facility, Platform Gilda is subject to rigorous internal and governmental inspections and maintenance, and remains fully capable of continuing to provide energy resources to the State of California.

Domestic Energy Production and Energy Security

DCOR notes Platform Gilda's continued safe and efficient production of oil and natural gas from existing infrastructure contributes to meeting domestic energy demand and bolster the nation's energy security. BOEM has stated that "Oil and gas from offshore California contributes to meeting domestic demand and enhances national economic security by reducing the need for imports." As noted previously, the OCSLA recognizes OCS oil and gas reserves as a "vital national resource" and directs the orderly development of these resources, subject to environmental safeguards. 43 U.S.C. §§ 1332(3). The proposed DPP Update is consistent with these national objectives and with the Congressional mandate to further the orderly development of OCS resources. DCOR respectfully submits these considerations to inform the Commission's evaluation of the proposed activities.

Conclusion

DCOR appreciates the review undertaken by the Commission and Commission Staff.

We respectfully submit that the extensive technical analyses, multiple layers of operational and environmental safeguards, demonstrated safety performance, approved spill response capabilities, and longstanding record of facility maintenance and regulatory compliance support a finding that the proposed DPP Update is consistent with the enforceable policies of the CCMP and the Coastal Act.

For these reasons, we respectfully request that the Coastal Commission approve Consistency Certification No. CC-0001-26.

Sincerely,



Dale Bradley

Chief Operating Officer

cc: Doug Boren, Pacific Regional Director, Marine Minerals Administration



1430 Chapala Street, Santa Barbara, CA 93101;
P.O. Box 90106, Santa Barbara, CA 93190; Office: (805) 965-7570
www.healththeocean.org

August 4, 2026

Meagan Harmon, Chair
California Coastal Commission
89 S. California St., Suite 200
Ventura, CA 93001

Re: Agenda Items Th8a and Th8b, Consistency Certification No. CC-0001-26

Dear Chair Harmon and Commissioners,

Heal the Ocean (HTO) strongly supports the denial of DCOR, LLCs application to carry out hydraulic fracturing well stimulation (fracking) operations on 16 existing wells at its Platform Gilda offshore oil platform. HTO is a 501(c)3 non-profit environmental organization that focuses on reducing ocean pollution and providing science-based solutions to improve the health of our oceans and resilience of our coasts to benefit people and wildlife. We are focused on Santa Barbara County, and our methods serve as models for other coastal communities across the country. HTO strongly supports the Commission staff's recommendation that the Commission object to Consistency Certification CC-0001-26.

This project would extend the life of the aging Platform Gilda, increasing the likelihood of oil spills in one of the most ecologically significant waters in the world. DCOR is not an operator with a good record; their facilities have been involved in two of the three most significant offshore spill incidents in the past five years, and they have not demonstrated effective containment and cleanup measures in the event of a spill.

As mentioned in the Staff report, the project area and surrounding Santa Barbara Channel region includes some of the most ecologically significant and protected ocean waters on the entire west coast of the United States. This project area has extremely high marine biodiversity, including many habitats which support threatened and endangered species. These waters also provide unmatched ecological, economic, and cultural significance and should not be threatened by offshore fracking. Offshore fracking involves the use of highly toxic chemicals that could be spilled into the sensitive marine environment, or contaminate discharged wastewater. Offshore fracking threatens marine life, recreation and coastal access, and commercial and recreational fishing. This project threatens sacred Tribal sites, submerged landscapes, traditional fishing areas, and cultural resources of the Chumash people. Further, this project undermines climate goals by prolonging the production of fossil fuels.

Heal the Ocean opposes any offshore fracking off of the coast of California and supports the denial of DCOR, LLC's application. Thank you for your consideration of these public comments.

Please do not hesitate to reach out with questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Noah Boland".

Noah Boland
Programs Manager, Heal the Ocean
www.healtheocean.org
noah@healtheocean.org

A handwritten signature in black ink, appearing to read "Karina Johnston".

Karina Johnston
Executive Director, Heal the Ocean
www.healtheocean.org
karina@healtheocean.org



August 6, 2026

Meagan Harmon, Chair
California Coastal Commission
455 Market Street, Ste 300
San Francisco, CA 94105
Submitted via EORFC@coastal.ca.gov

CC: Maggie Hall
Deputy Chief Counsel
Environmental Defense Center
906 Garden Street
Santa Barbara, CA 93101

**Re: DCOR Offshore Fracking Consistency Certification and BOEM Consistency Determination –
Items Th8a, Th8b—OBJECT**

Dear Chair Harmon and Commissioners:

This review of the DCOR, LLC Well Stimulation Treatment (WST) Environmental Impact Statement (EIS) (BOEM, 2026), Update to Development and Production Plan (DPP) and Environmental Report (Padre, 2026), and Coastal Zone Management Act Consistency Analysis and Findings (Padre, 2026) has been conducted on behalf of the Environmental Defense Center. Blue Tomorrow, LLC is an environmental consulting company that specializes in assessing environmental impacts from various pollution sources, including oil and gas operations. Our letter provides additional analysis that supports the California Coastal Commission (CCC) staff recommendation regarding both Consistency Certification No. CC-0001-26 and Consistency Determination No. CD-0005-26, concerning DCOR, LLC's (DCOR) Updated Development and Production Plan (DPP). This review discusses the following concerns:

- Many constituents in Hydraulic Fracking Fluids (HFF) have unknown toxicity
- Risks associated with HFF from WST and spills have not been sufficiently evaluated
- Impacts to marine organisms from exposure to HFF chemical constituents and discharges have not been fully assessed
- There are concerns that NPDES testing requirements are inadequate for assessing risks from offshore discharges

Based on these considerations, the DPP and CMA Consistency Analysis and Findings are deficient in supporting the determination that no significant impacts are likely to occur from the use of Hydraulic Fracturing of 16 wells on Platform Gilda on the Southern California Outer Continental Shelf (OCS). The uncertainties and impacts discussed below should be more thoroughly evaluated to adequately assess the environmental impacts that may result from the proposed action.

Many constituents in HFF have unknown toxicity

The DPP confirms that HFF fluid constituents have the potential to affect marine organisms, but that “due to the lack of toxicity data for many constituents for well stimulation chemicals, the effects within

the pelagic mixing zone are not fully characterized (Padre, 2026).” Instead, the constituents listed in the DPP include biocides with acute marine toxicity and there is no evaluation of potential compounding effects from exposure to these constituents if they were mixed.

The potential composition of produced water proposed to be discharged is not adequately assessed. The DPP states that produced water from Platform Gilda is sent to the facility at Mandalay where it is separated and then returned offshore to discharge into the ocean (Padre, 2026). The EIS notes that “produced water and other routine platform discharges may contain residual hydrocarbons, trace metals, and treatment chemicals (BOEM, 2026).”

During HFF heavy metals, organics, and radioactive material can be mobilized from the formation by chemicals in the injection fluid or by the fracturing of the target formation and mixed with the flowback fluids (Abdullah, et.al. 2016; Nelson, et.al 2014). During hydraulic fracturing, there is also potential for compound transformations to occur that can contribute to unintended environmental impacts (Eslner, M., 2016; Hoelzer, K., 2016). It is unclear from the DPP what the composition of the effluent resulting from WST activities on Platform Gilda will be prior to discharge.

A fundamental problem with assessing the toxicity from HFF and the corresponding effluent is the lack of information on the composition of discharged fluids. During HFFs additional constituents can be mobilized from the formation and their chemistry and toxicity are unknown. The DPP and the Consistency Analysis and Findings do not adequately assess the risk of HFF, due to the lack of disclosure on the effluent chemistry and its toxicity.

Risks associated with HFF from WST and spills have not been sufficiently evaluated

There are inconsistencies between the EIS, DPP, and Consistency Analysis and Findings on the closed-loop system that limit risk assessment of the proposed activities. The Consistency Analysis and Findings document states that all HFF will be kept in a closed-loop system but does not provide any specifics for how that will be achieved. During WST the HFF will be co-mingling with produced water in the oil reservoir. The reports do not characterize the potential risks from the HFF that are being disposed of in the injection wells and possible connectivity with production wells. The DPP and Consistency Analysis do not mention if produced water will be tested for these HFF chemicals prior to being discharged. The degradation of HFF in the oil reservoir is unknown. If there are any residual HFF in the discharged produced water, then this would not be a completely closed-loop system, as stated in the DPP.

The DPP and Consistency Analysis and Findings address the risk of spills stating that existing prevention measures used for oil spills will be used, including “deck areas that drain to the Platform’s oily-water system, which remains subject to NPDES sheen prohibitions and oil-and-grease controls prior to any authorized discharge.” The chemical additives used in HFF are not oil or grease and are naturally soluble. The reports do not explain how this system is adequate for preventing the discharge of these chemicals when they are spilled.

Impacts to marine organisms from exposure to HFF chemical constituents have not been fully assessed

Due to data gaps for HFF and effluent toxicity, the DPP and EIS assessment on potential impacts to marine organisms is inadequate. Toxicological studies on wastewaters associated with hydraulic fracturing and other unconventional oil and gas extractions in the offshore environment are not readily available (Folkerts et al., 2020). While the DPP and EIS acknowledge that certain stimulation additives

may exhibit toxicity at high concentrations, it claims that dilution in seawater would reduce toxicity to below levels expected to cause acute or chronic toxicity (Padre, 2026; BOEM, 2026). This determination does not address the greater potential to impact biological resources due to the high localized densities of marine species found at offshore platforms. Notably around California offshore platforms, studies have shown higher fish densities and production rates to be an order of magnitude above other natural areas (Claisse et al., 2014).

While there is a lack of understanding of direct impacts to marine organisms from discharges of produced water that were co-mingled with flowback fluids (Zhong et al., 2021), direct impacts to marine species from diluted flowback fluids have been documented (Folkerts et al., 2020). Produced water has been shown to be lethal to larva of the *Watersipora subtorquata* (a sessile filter feeding animal when mature) at concentrations of 10% produced water mixed in seawater and sub-lethal effects at concentrations around 1% (Raimondi & Boxshell 2002).

Several citations used to justify that impacts to marine organisms are likely to be negligible are misrepresented in the DPP and EIS. The DPP and EIS reference the 2016 Programmatic Environmental Assessment of the Use of Well Stimulation Treatments on the Southern California Outer Continental Shelf (Argonne, 2016), which included a study on bioaccumulation and toxicity risks to fish from produced water discharges in the Gulf of Mexico (Continental Shelf Associates, 1997), to justify its determination that, “WSTs are not expected to cause either an acute or a chronic effect on benthic organisms and fish species.” However, this study conducted by Continental Shelf Associates instead states that cadmium, copper, and Polycyclic Aromatic Hydrocarbons (PAH’s) can bioaccumulate at toxic levels in marine organisms at platforms where produced water discharges occur (Continental Shelf Associates, 1997). The EIS also references a study to support its justification where whole-fish composites of Pacific sanddab were sampled and tested for PAH’s, PCB’s and other pollutants from decommissioned OCS Platforms (Gale et al., 2013), thus making the study irrelevant to the proposed action.

The DPP contains no information on the degradability of the HFF chemical additives or how the toxicity may be increased when they are combined with each other and other toxic hydrocarbons and organic compounds. Additive toxic effects of mixing these chemicals could increase their impacts on the marine environment. As a result, the DPP and Consistency Analysis and Findings are unable to adequately assess risks to marine organisms from WST activities on Platform Gilda.

There are concerns that NPDES testing requirements are inadequate for assessing risks from offshore discharges

Some of the constituents used in hydraulic fracturing fluids that have toxicity data were reviewed in the DPP with respect to their individual toxic effects for the proposed HFF. As discussed, there is no assessment of the constituents contained in the separated effluent that will be discharged off Platform Gilda and therefore the DPP does not evaluate the toxicity of the whole fluid (the whole effluent toxicity) required through the NPDES permit. There are both cumulative and interaction (or synergistic) effects that should be considered in assessing the toxic effects of a fluid with multiple toxic constituents (Cedergreen, 2014).

The NPDES permit that covers Platform Gilda (NPDES General Permit CAG280000, 2013) specifies requirements for the discharge of Well Treatment, Completion, and Workover Fluids (Discharge 003) and Produced Water (Discharge 002). The permit stipulates that if well treatment, completion, or

workover fluids are co-mingled with produced water then the effluent limitations and monitoring requirements for produced water apply to the co-mingled fluids (Discharge 002).

The DPP proposes to conduct whole effluent toxicity (WET) testing in accordance with the NPDES Discharge 002 requirements. WET testing involves the short-term exposure of three test organisms (red abalone, giant kelp, and topsmelt) to a 24-hour composite effluent sample (multiple samples collected over 24 hours and combined into one sample). WET testing through NPDES is performed quarterly and will likely not capture the toxicity effects of routine discharges, as “the timing of WET tests is not linked to well stimulation events in the NPDES permit (Houseworth & Stringfellow, 2015).” Furthermore, if results from WET tests indicate no observable effects, the testing frequency is reduced from quarterly to annual WET tests (NPDES General Permit CAG280000, 2013).

Conclusion

The following conclusions support the California Coastal Commission determination that offshore hydraulic fracturing at Platform Gilda is inconsistent with policies concerning spills of hazardous materials and protection of marine life. The information presented in the DPP and Consistency Analysis and Findings is insufficient to support the determination that no significant impacts are likely to occur from WST activities on Platform Gilda.

Limited information is presented with respect to HFF constituent toxicity. While individual constituents are noted, their compounding toxicity is not evaluated. There is potential for other constituents from HFF to comeingle with produced water that is proposed to be separated, and the composition of produced water that is proposed to be routinely discharged is not thoroughly evaluated. The proposed oil spill prevention measures are likely insufficient for containing spills of HFF or its chemical additives.

The DPP does not sufficiently evaluate potential impacts to marine species. Biological surveys were not conducted and the studies referenced in the DPP to support the Consistency Analysis and Findings are misleading. Instead, studies do indicate that platforms on the OCS are marine ecological hotspots and that direct impacts to marine organisms have been found from exposure to HFF and produced water discharges. There is uncertainty that mitigation measures contained in the DPP and NPDES are sufficient to monitor impacts to water quality and biological resources. There are concerns with the absence of information on effluent composition along with timing of WET tests required through the NPDES.

There are potential impacts to water quality and marine organisms from the proposed hydraulic fracturing activities based on discharges and potential for spills of hazardous materials. As a result of these considerations, the DPP and CMA Consistency Analysis and Findings are deficient in its evaluation and determination that there will be no significant impacts from WST activities.

Respectfully,



Alex Dragos
Founder
Blue Tomorrow, LLC



Eric Hopkins
Founder
Blue Tomorrow, LLC

References

- Abdullah, K., Timothy Malloy, Michael K. Stenstrom & I. H. (Mel) Suffet (2016). Toxicity of acidization fluids used in California oil exploration. *Toxicological & Environmental Chemistry*. Available at: <http://dx.doi.org/10.1080/02772248.2016.1160285>
- Argonne National Laboratory (2016). Programmatic Environmental Assessment of the Use of Well Stimulation Treatments on the Southern California Outer Continental Shelf. Report for Bureau of Safety and Environmental Enforcement, Pacific OCS Region and Bureau of Ocean Energy Management, Pacific OCS Region. May 2016
- Bureau of Ocean Energy Management (2026). DCOR Well Stimulation Treatment Environmental Impact Statement. Platform Gilda Offshore Ventura County. April 2026.
- Cedergreen, N. (2014). Quantifying Synergy: A Systematic Review of Mixture Toxicity Studies within Environmental Toxicology. *PLoS ONE* 9(5): e96580. DOI:10.1371/journal.pone.0096580
- Claisse J.T., D.J. Pondella, M. Love, L.A. Zahn, C.M. Williams, J.P. Williams, and A.S. Bull, (2014), Oil Platforms Off California Are Among the Most Productive Marine Fish Habitats Globally. *PNAS*, 111 (43), 15462–15467, www.pnas.org/cgi/doi/10.1073/pnas.1411477111.
- Continental Shelf Associates, (1997), Gulf of Mexico Produced Water Bioaccumulation Study Executive Summaries, prepared for Offshore Operators Committee, New Orleans, LA, April. Available at <http://www.deq.louisiana.gov/portal/Portals/0/permits/lpdes/pdf/EPA%20Executive%20Summaries.pdf>.
- Gale, R.W., Tanner, M.J., Love, M.S., Nishimoto, M.M., and Schroeder, D.M., (2013), Comparison of Aliphatic Hydrocarbons, Polycyclic Aromatic Hydrocarbons, Polychlorinated Biphenyls, Polybrominated Diphenylethers, and Organochlorine Pesticides in Pacific Sanddab (*Citharichthys sordidus*) from Offshore Oil Platforms and Natural Reefs along the California Coast, Open-File Report 2013–1046, U.S. Geological Survey.
- Folkerts EJ, Heuer RM, Flynn S, Stieglitz JD, Benetti DD, Alessi DS, Goss GG, Grosell M. (2020). Exposure to Hydraulic Fracturing Flowback Water Impairs *Mahi-Mahi* (*Coryphaena hippurus*) Cardiomyocyte Contractile Function and Swimming Performance. *Environ Sci Technol*. 2020 Nov 3;54(21):13579-13589. doi: 10.1021/acs.est.0c02719. Epub 2020 Oct 14. PMID: 33138383.
- Elsner, M.; Hoelzer, K. (2016) Quantitative Survey and Structural Classification of Hydraulic Fracturing Chemicals Reported in Unconventional Gas Production. *Environ. Sci. Technol*. 2016, 50 (7), 3290-3314
- Hoelzer, K. *et al.* (2016) Indications of Transformation Products from Hydraulic Fracturing Additives in Shale-Gas Wastewater. *Environ. Sci. Technol*. 2016, 50 (15), 8036 – 8048
- Houseworth, J., & W. Stringfellow, (2015). A Case Study of California Offshore Petroleum Production, Well Stimulation, and Associated Environmental Impacts, Chapter 2 in: An Independent Scientific Assessment of Well Stimulation in California, Volume III, California. Council on Science and Technology. Available at: <http://ccst.us/publications/2015/2015SB4-v3.pdf>

- Nelson, A. W., Dustin May, Andrew W. Knight, Eric S. Eithrheim, Marinea Mehrhoff, Robert Shannon, Robert Litman, Michael K. Schultz (2014). Matrix Complications in the Determination of Radium Levels in Hydraulic Fracturing Flowback Water from Marcellus Shale. *Environmental Science & Technology Letters*.1 (3), 204-208. DOI: 10.1021/ez5000379
- NPDES General Permit CAG280000 (2013). EPA Region 9: Final National Pollutant Discharge Elimination System (NPDES) General Permit No. CAG280000 for Offshore Oil and Gas Exploration, Development and Production Operations off Southern California. Available at: <https://www3.epa.gov/region9/water/npdes/permits.html>
- Padre Associates (2026). Coastal Zone Management Act Consistency Analysis and Findings. Platform Gilda Well Stimulation Program Offshore Ventura County. Project No. 2502-2681. Prepared for: DCOR L.L.C.. March 2026.
- Padre Associates (2026). Update to Development and Production Plan and Environmental Report. Well Stimulation: Hydraulic Fracturing. Platform Gilda Offshore Ventura County. Project No. 2502-2681. Prepared for: DCOR, L.L.C. January 2026.
- Raimondi, P., & A. Boxshall (2002). Effects of Produced Water on Complex Behavior Traits of Invertebrate Larvae. OCS Study MMS 2002-050, U.S. Department of the Interior, Minerals Management Service, Pacific OCS Region, 38 pp.
- Zhong, C.; Kwan, Y.H., Goss, G.; Alessi, D.; Qian, P-Y. Hydraulic Fracturing Return Fluids from Offshore Hydrocarbon Extraction Present New Risks to Marine Ecosystems. *Environ. Sci. Technol.* (2021) 55 (8): 4199–4201.

August 7, 2026

Meagan Harmon, Chair
California Coastal Commission
455 Market Street, Ste 300
San Francisco, CA 94105

Submitted via EORFC@coastal.ca.gov

RE: Paasha Mahdavi, Ph.D.¹ Assessment of Current and Projected Production at Platform Gilda, Agenda Items Th8a and Th8b

Dear Chair Harmon and Commissioners:

I have been retained by the Environmental Defense Center to conduct the below analysis concerning Consistency Certification No. CC-0001-26 and Consistency Determination No. CD-0005-26.

Summary Overview

In January 2026, DCOR, L.L.C. (DCOR) proposed a program for well stimulation treatments, including hydraulic fracturing techniques (fracking), to increase oil and gas production from the Santa Clara Unit at Platform Gilda.² In its proposed update to the Development and Production Plan, the company projects that as a result of the proposed fracking program, Platform Gilda will produce roughly 14 million barrels of oil and 13 million cubic feet of natural gas through 2046.³

This report assesses the current and projected production of oil⁴ at Platform Gilda based on industry standard models for scenarios under the proposed fracking program and estimates of cumulative conventional production without fracking. Based on this analysis, this assessment reaches three conclusions:

¹ Founding Principal, Foil Energy Research L.L.C., and Associate Professor and Director of the Energy Governance and Political Economy (EGAPE) Lab at UC Santa Barbara. Mahdavi holds degrees in economics (B.A), international energy policy (M.A.), statistics (M.S.), and political science (Ph.D.) from Columbia University, Stanford University, and UCLA. Mahdavi is solely responsible for the analysis contained in this report, which does not represent or reflect the positions of the University of California. Correspondence: paasha@foilenergyresearch.com.

² DCOR, L.L.C. / Padre Associates. 2026. Platform Gilda Well Stimulation Program: Update to Development and Production Plan and Environmental Report. (January).

³ DCOR, L.L.C. / Padre Associates, 2026, page 4-36.

⁴ Projected natural gas production is not assessed here.

1. Projected production under the proposed fracking program is 14.1-14.6 million barrels through 2050, compared to industry estimates of 6.1 million barrels that are recoverable under conventional production without fracking.⁵ This implies cumulative added production from undertaking the proposed fracking program at 8.0-8.5 million additional barrels of oil. This is to 6% to 10% lower than the 9 million additional barrels of oil over 20 years implied by the project EIS.⁶
2. Based on long-run price elasticities, projected oil production at Platform Gilda is insignificant to meaningfully alter oil prices. Prices are set by global markets based on annual oil consumption of roughly 100 million barrels per day through 2050. Under the proposed fracking program, cumulative levels of oil production through 2050 would account for roughly 0.0009% of projected global oil consumption over the same time frame. At modeled peak production levels of roughly 4,300 barrels per day in 2030, the maximum projected production at Platform Gilda would account for 0.027% of national oil consumption in 2030 and 0.004% of global oil consumption. Based on modeled projections, approval of the fracking proposal at Platform Gilda would at best reduce long-term prices by \$0.001/barrel in 2030 and beyond, or roughly one-tenth of one penny.
3. There is no justification for the proposed fracking program as necessary for national security. Increasing crude oil production offshore California has no impacts on US military consumption: the US military does not directly purchase crude oil, but instead procures refined products such as jet fuel, diesel, and gasoline. In addition, military fuel acquisition is intentionally not wholly reliant on domestically-sourced refined products, as the Defense Logistics Agency Energy (DLA-E) procures a mix of domestically- and globally-sourced fuel given the logistics of forward-operating military activities.

The remainder of this assessment provides an overview of modeling results and the basis for these conclusions, with methodological details included in the Appendix.

Current and projected oil production at Platform Gilda under conventional operations

The US government stated as early as the year 2000 that the “Santa Clara Field is in a mature development stage.”⁷ Commercial production from the field began in December 1981, with

⁵ Projected recoverable reserves of 6.1 million barrels are estimated based on data from Rystad Energy. Note that these figures are not reported publicly by DCOR. The high oil case assumes reserves that are commercially recoverable without additional capital expenditures; as a result, this number is lower than the remaining proved oil reserves of 11,368,668 barrels as reported by the Bureau of Ocean Energy Management. (Bureau of Ocean Energy Management Pacific Outer Continental Shelf Region. *Field Reserve Estimate Summary as of December 2025*.)

⁶ The no-frack cumulative production is not explicitly reported by DCOR, but is inferred as 5 million barrels, based on the 14 million barrels of total cumulative production (see note 3) and figures reported by the California Coastal Commission Staff Report filed June 29 2026 (Th8b; CD-0005-26), page 19: “As described in the project EIS, the proposed fracking operation is projected to result in the extraction of approximately 9 million barrels of oil and 13 million cubic feet of natural gas over 20 years.”

⁷ US Department of Interior Minerals Management Service (MMS) Pacific OCS Region. 2000. *Final California Offshore Oil and Gas Energy Resources Study*. OCS Study MMS 99-0043, page 2-22.

primary production from Platform Gilda. Oil production peaked in October 1983 at 7,915 barrels per day and has declined to 946 barrels per day as of May 2026; including gas production, total production as of May 2026 is 1,202 barrels of oil equivalent per day.⁸

Future oil production without fracking is estimated based on industry reports of remaining recoverable resources and operating expenses without additional capital expenditure. Based on these estimates, the maximum cumulative future production without fracking is 6,073,800 barrels of oil, assuming per-barrel operating expenses of \$10.20/barrel under a high-oil price scenario at \$120/barrel.⁹

Projected oil production at Platform Gilda with fracking approval

Projections for future production with fracking can be made using a stepwise production function based on DCOR's planned fracking scenarios applied to existing academic models of fracking-based decline rates across different future oil price scenarios for Brent crude at \$40, \$80, and \$120 per barrel.¹⁰

Based on these projections, oil production at Platform Gilda would ramp up in three phases before sharply declining and leveling out after 2050 depending on future oil prices (*Figure 1. Historical production and projected oil production at Platform Gilda under proposed fracking program.*). The first ramp-up occurs in mid 2028 with production rising to roughly 3,200 barrels per day after the first fracking campaign; the second occurs in mid 2030 with a ramp-up to roughly 4,300 barrels per day; and the third occurs in mid 2032 with a ramp-up to roughly 4,000 barrels per day.

Production declines rapidly after the final fracking campaign based on modeled depletion rates for fracked wells across the US and a terminal-period baseline decline rate for mature fields.¹¹ This decline rate is also consistent with Platform Gilda's decline rate after the 2013 fracking campaign, which reached a peak of 2,302 barrels per day in June 2015 before declining to 50% of that rate by September 2018.¹²

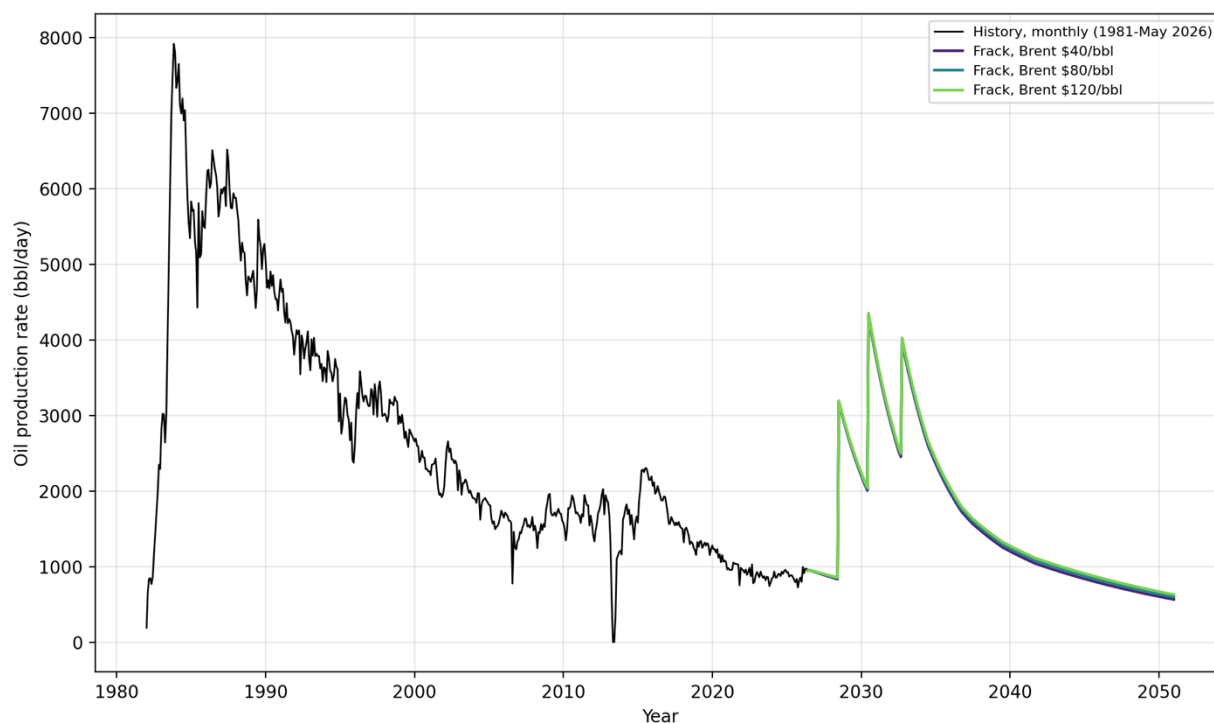
⁸ US Bureau of Safety and Environmental Enforcement (BSEE). "Production by Platform Online Query." Accessed July 2026 from <https://www.data.bsee.gov/Production/ProdbyPlatform/Default.aspx>.

⁹ See note 5.

¹⁰ Handler, B., Bhalala, V., O'Byrne, L., and Crompton, J. 2025. *A Study of Terminal Decline Rates of Oil & Gas Wells*. Payne Institute for Public Policy, Colorado School of Mines. See Appendix A.6 for modeling details.

¹¹ Handler et al. 2025; Society of Petroleum Evaluation Engineers. 2021. *Annual Parameters Survey*. See Appendix A.1 and A.5.

¹² BSEE Production by Platform Online Query, 2026. These models incorporate the fracking projections provided by DCOR in its DPP. It is notable that under the previous fracking program in 2013, when remaining reserves were higher, fracked production achieved a maximum of roughly 2,300 barrels per day. DCOR's current projected peak under a new fracking program is roughly double the previous fracking-program peak.



*Figure 1. Historical production and projected oil production at Platform Gilda under proposed fracking program.*¹³

Projections show that after the fracking campaigns are completed, production declines hyperbolically based on the remaining economically recoverable reserves of the Santa Clara Unit. Cumulative projected oil production for the period 2026-2050 ranges between 14,114,299 and 14,639,593 barrels across different price scenarios. This number is in line with DCOR’s projections of “approximately 14 million barrels of oil” produced over the next 20 years.¹⁴

Compared to cumulative conventional production without fracking, DCOR’s fracking campaigns, if approved, would add between 8.0 and 8.5 million barrels of oil through 2050. This is roughly 5-10% lower than the amount projected by DCOR, given the company’s assumed lower cumulative production without fracking.¹⁵

¹³ See Appendix for modeling details. Fracking projection model specification is reported in Appendix A.5. Model parameter assumptions are reported in Appendix A.7.

¹⁴ DCOR, L.L.C. / Padre Associates, 2026, page 4-36. The projections reported in this report are slightly higher given the outlook through December 2050, compared to the outlook through 2046 in projections made by Padre Associates based on data provided by DCOR.

¹⁵ See note 6.

Projected post-fracking production in context of state, national, and global consumption

Current and anticipated production levels from Platform Gilda are effectively a rounding error compared to what the market is demanding, both in 2026 and for the next 25 years. Current production levels of 953 barrels per day is roughly 0.057% of statewide oil consumption, 0.0046% of national oil consumption, and 0.0009% of global oil consumption.¹⁶ This is roughly the amount of petroleum consumed daily by 22,000 Californians.

Without fracking, the maximum projected cumulative production through 2050 is 6.1 million barrels based on industry estimates of economically recoverable reserves under conventional operations.¹⁷ By comparison, the US Energy Information Administration projects that the United States will consume between 125 billion barrels and 155 billion barrels over the same timeframe.¹⁸ This would put Platform Gilda's projected production without fracking at roughly 0.004% to 0.005% of total US oil consumption over this period.

If fracking is approved, these figures increase modestly given the scale of statewide, national, and global demand over the next 25 years. At modeled peak production levels of roughly 4,300 barrels per day in 2030, the maximum projected production at Platform Gilda would account for 0.027% of national oil consumption in 2030 and 0.004% of global oil consumption.¹⁹ The cumulative increase of 8.0 to 8.5 million barrels through 2050 from fracking versus conventional production represents roughly 0.005% to 0.007% of total US oil consumption over this period.²⁰

Market impacts of anticipated post-fracking production levels at Platform Gilda

Based on long-run price elasticities, projected oil production at Platform Gilda under the proposed fracking program is insignificant to meaningfully alter oil prices. Existing energy

¹⁶ California estimates based on total statewide end-use consumption of petroleum of 1,676,712 barrels of oil per day in 2024, based on data from the US Energy Information Administration: [eia.gov/states/CA/overview](https://www.eia.gov/states/CA/overview). EIA data is converted from trillion BTU to barrels per day using industry conversion factor of 5.8 million BTU per barrel. National estimates based on total petroleum consumption of 20,610,000 barrels of oil per day in 2025, based on data from the US Energy Information Administration:

<https://www.eia.gov/totalenergy/data/browser/?tbl=T03.05#/?f=A&start=1949&end=2025&charted=16>. Global estimates based on global oil consumption of 103,200,000 barrels of oil per day in 2025, based on data from the International Energy Administration: <https://www.iea.org/reports/global-energy-review-2026/oil>

¹⁷ Rystad Energy; see note 5. The year 2050 is used as a comparable end date to the fracking model. However, decline rates under conventional production are not modeled here, such that the shut-in date without fracking is not projected, but could occur well before 2050.

¹⁸ US Energy Information Administration. *Annual Energy Outlook 2026*. Washington DC: Department of Energy. Accessed from www.eia.gov/outlooks/aeo/excel/Narrative_Figures.xlsx, sheet 3A_TotConsFuel_narrative (see column M). Estimated based on EIA projections of 29-36 quadrillion BTU of petroleum consumption annually from 2025 to 2050, converted using the conversion rate from footnote 16.

¹⁹ US Energy Information Administration. *Annual Energy Outlook 2026*. Washington DC: Department of Energy. Accessed from www.eia.gov/outlooks/aeo/excel/Narrative_Figures.xlsx, sheet 3A_TotConsFuel_narrative (see column M). Estimated based on EIA projections of oil consumption in 2030 under a high oil supply scenario at 33.94 quad BTU or 5.85 billion barrels of oil per year, converted using the conversion rate from footnote 16.

²⁰ See note 18 for total US oil consumption through 2050.

economic models estimate a long-run supply inelasticity of 0.2 to 0.5, which suggests that for a 1% permanent addition to global oil supplies there is a roughly 1-2% decline in crude oil prices.²¹ Applying this to projected production figures from above, projected operating costs, and future prices of \$80/barrel, fracking Platform Gilda would at best reduce long-term prices by \$0.001/barrel, or roughly one-tenth of one penny.²²

Implications of fracking approval at Platform Gilda for national security

The California Coastal Commission Staff Report for DCOR's proposed application notes that according to 15 C.F.R. § 930.122, a federal license or permit activity is "necessary in the interest of national security" if "a national defense or other national security interest would be significantly impaired were the activity not permitted to go forward as proposed."²³ Considering the projected production levels in the context of US military consumption and the lack of implications of Platform Gilda's production as regards the military procurement process of refined petroleum products, DCOR's fracking proposal does not meet the threshold for being necessary in interest of national security.

Using modeled peak production levels of roughly 4,300 barrels per day in 2030, this would be equivalent to roughly 2% of the 216,986 barrels per day of petroleum purchased by the US military in 2025 through the Defense Logistics Agency Energy (DLA-E).²⁴

However, these figures are not comparable: the US military does not purchase crude oil directly, but instead purchases refined products such as jet fuel, aviation, diesel, and automotive gasoline.²⁵ The military operates no oil refineries, nor any machinery that takes crude oil as an input.²⁶ Instead, the military (via DLA-E) purchases products from refineries – not from crude oil producers like DCOR – while these refineries ultimately source crude oil as an input from a variety of global and domestic producers.

Regarding sourcing, increasing the supply of domestically produced oil has little to no impact on long-term US refinery supply. This is due to the fungibility of oil markets and the flexibility of refineries to procure oil produced globally in order to supply domestic markets with refined

²¹ Krichene (2002). "World crude oil and natural gas: a demand and supply model." *Energy Economics* 24(6); Cooper (2003). "Price elasticity of demand for crude oil: estimates for 23 countries." *OPEC Review* 27(1); Newell & Prest (2019). "The unconventional oil supply boom." *The Energy Journal* 40(3).

²² See Appendix A.6 for capex estimates and A.7 for model assumptions on baseline per-barrel operating costs, which are below all Brent price scenarios modeled.

²³ As noted in California Coastal Commission Staff Report filed April 1 2026 (Th8a; CC-0001-26), page 9.

²⁴ Based on an annual total of 79.2 million barrels of petroleum products purchased by the US military in 2025. See: Defense Logistics Agency Energy. *Fiscal Year 2025 Fact Book*. See page 13.

²⁵ Defense Logistics Agency Energy. *Fiscal Year 2025 Fact Book*. See page 4.

²⁶ Defense Logistics Agency Energy. "DLA Products." Accessed from <https://www.dla.mil/What-DLA-Offers/Products/>. See also Rossetti, M. D., & Bright, J. 2018. "Bulk petroleum supply chain simulation modeling." In *2018 Winter Simulation Conference*, pp. 3060-3071. IEEE.

products.²⁷ US-based refineries rely on global oil markets to source inputs; likewise, crude oil producers in the US sell on a global oil market to the highest bidder at prevailing market rates. Since 2011, US-based refinery capacity has exceeded domestic demand – including military consumption – such that the US is a net exporter of refined petroleum products.²⁸

In addition, Congressional analysis of the military fuel supply chain concludes that any constraints on domestic refining capacity would not compromise military fuel supply chains. By contrast, a predominantly domestically-sourced petroleum product supply chain poses logistical challenges given the global nature of military activities:

“The lack of U.S. refining capacity does not necessarily compromise DOD’s fuel supply. A lengthy fuel supply chain that extends from the continental United States to forward operating areas (Iraq or Afghanistan, for example) is not desirable. Logistics demand that closer refineries supply the fuel. [DLA-E] makes up the balance of its purchases through contracts with foreign refineries and suppliers to support U.S. forces and installations outside the continental United States.”²⁹

As a result, DLA-E has fuel purchasing agreements with over 40 partner nations to ensure fuel reliability in operations worldwide.³⁰ As of August 2026, none of the DLA’s contracted agreements are with crude oil producers, nor do any rely on specifically-sourced crude oil production.³¹

The structure of the military fuel supply chain is such that it is not sensitive to changes in domestic crude oil production. Given both the modest increases in projected production with fracking at Platform Gilda and the US military’s direct sourcing of petroleum products rather than crude oil, there would no discernable impairment to national defense if DCOR’s fracking proposal is not approved.

Conclusions

The approval of fracking activities at Platform Gilda would have minimal impacts on energy markets and no significant implications for national security.

²⁷ See, e.g., Krupnick, A., Morgenstern, R., Balke, S., Brown, P.A., Herrera, A.M., and Mohan, S. 2017. “Oil Supply Shocks, US Gross Domestic Product, and the Oil Security Premium.” Resources for the Future report; Bordoff, J. and Houser, T. 2015. “Navigating the US Oil Export Debate.” Columbia Center for Global Energy Policy report.

²⁸ US Energy Information Agency. Petroleum Supply Annual (PSA) 2025. Accessed August 2026 from <https://www.eia.gov/petroleum/supply/annual/volume1/>

²⁹ Congressional Research Service. “Department of Defense Fuel Spending, Supply, Acquisition, and Policy.” CRS Report for Congress by Anthony Andrews (September 22, 2009). 7-5700; R40459. Page 14. The original text references DESC, the predecessor to DLA-E.

³⁰ Congressional Research Service. “Defense Primer: The Defense Logistics Agency.” CRS In Focus IF11233, *Defense Primer: Defense Working Capital Funds*, by Cameron M. Keys and Brendan W. McGarry (December 12 2024). IF 11543.

³¹ Based on data reported in the Bulk Contract Information System hosted by the Defense Logistics Agency. Accessed August 2026 from <https://cis.energy.dla.mil/pcscis/CogSelection?type=BULK>.

Model-based analysis of the projected production of crude oil at Platform Gilda under DCOR's proposed fracking campaigns estimates cumulative production of 14.1-14.6 million barrels over the 2026-2050 period and a maximum daily production rate of approximately 4,300 barrels per day of oil in 2030. In context, this production level is 0.027% of projected national oil consumption in 2030 and 0.004% of global oil consumption. Price impacts are limited to at most a \$0.001 decrease in Brent oil prices in 2030 at the peak of projected production under fracking.

The analysis of the US military fuel supply chain presented here suggests no significant impairment of national defense if fracking at Platform Gilda is not approved. Not only are the projected amounts from fracking modest relative to total military consumption, the US military does not directly procure crude oil but rather purchases petroleum products from refiners, which source crude oil based on market factors. By the standards set in 15 C.F.R. § 930.122, the proposal for fracking at Platform Gilda does not meet the threshold for being necessary in the interest of national security.

Appendix

Platform Gilda Oil Production Projection Model (DCOR Well-Stimulation Scenario), June 2026 – December 2050

A.1 Data Sources and Conversions

Monthly platform production is drawn from BSEE production-by-platform data, Dec 1981 - May 2026. Production is converted to barrels as rate times days-in-month and then aggregated to annual totals. Cumulative historical production based on these data: 21.06 MMbbl through 1993, 42.62 MMbbl through 2025, and 42.76 MMbbl through May 2026.

The well-stimulation (frac-pack) model follows the drilling schedule in DCOR's Development and Production Plan Update (January 2026), superimposed on the decline of existing production. The frac-pack model is projected at monthly frequency from June 2026 through December 2050, with January-May 2026 actuals fixing the base rate and counting against the resource constraint.

Three flat real Brent price scenarios are run: \$40, \$80, and \$120 per barrel at real 2025 USD. The resource constraint uses a recovery-factor structure on original oil in place (OOIP $\approx$ 300 MMbbl; Section A.3). The pre-stimulation ultimate recovery factor (18.0% of OOIP) is calibrated so that full economic recovery equals cumulative production through 2025 plus the remaining proved oil reserves reported for the Santa Clara field as of December 2025 (11,368,668 barrels) in BOEM's Pacific OCS Region Field Reserve Estimate Summary; Platform Gilda is the field's only active producing facility. Well stimulation is assumed to raise the ultimate recovery factor by 3.0 percentage points, to 21.0%.

A.2 Field decline rate

With annual production rate $Rate_t$ (annual barrels/365), the year-over-year decline rate is averaged over production since 1994 ($t = 1995, \dots, 2025$):

$$\frac{1}{31} \sum [(Rate_t - Rate_{t-1}) / Rate_t] = \bar{D} = -0.0654 \quad (A1)$$

The implied annual multiplier is $1/(1 - \bar{D})$, so the effective annual decline rate is:

$$\delta_A = 1 - \frac{1}{1 - \bar{D}} = 0.0614 \quad (A2)$$

A.3 Resource constraint and price scenarios

The economic fraction of remaining resource recoverable at price P follows an assumed linear schedule: $f = 0.809$ at a Brent price of \$34.4/bbl, rising to full recovery ($f = 1$) at \$120/bbl, which is the maximum-price convention used in this assessment:

$$f(P) = \min[1, 0.809 + 0.191 \cdot \frac{P - 34.4}{120 - 34.4}] \quad (A3)$$

OOIP is estimated as original recoverable oil (52–70 MMbbl across BOEM assessment vintages) divided by a 15–25% recovery factor typical of analogous unconsolidated California offshore Repetto reservoirs, giving ~280–470 MMbbl; the central value of 300 MMbbl is used. The economically recoverable

resource (ERR) from field start at the with-stimulation ultimate recovery factor ($RF_{ult} = 21.0\%$), and the remaining economic resource at the June 2026 projection start, are specified as follows:

$$ERR_{total}(P) = C_{2025} + f(P) \cdot (RF_{ult} \cdot OOIP - C_{2025}) \quad (A4)$$

$$R(P) = ERR_{total}(P) - C_{May\ 2026} \quad (A5)$$

This gives $R = 16.60, 18.41$, and 20.23 MMbbl at oil price scenarios of \$40/barrel, \$80/barrel, and \$120/barrel, respectively. Cumulative production from field start is capped at $ERR_{total}(P)$; production shuts in permanently if the cap is reached (depletion = 1). The cap does not bind in any price scenario by 2050: projected recovery reaches 19.0–19.1% of OOIP against the 21.0% with-stimulation ultimate.

Break-even operating cost (\$10.20/bbl) enters net-revenue accounting, $(P - OpEx) \times barrels$, but never triggers shut-in since all scenario prices exceed it.

A.4 Existing-well (unstimulated) base production

Existing (unstimulated) production declines exponentially from $q_0 = 959.6$ bbl/day. For this decline-rate scaling, $R(P)$ is evaluated at the pre-stimulation ultimate recovery factor (18.0%), giving $R = 9.20, 10.21$, and 11.22 MMbbl at \$40, \$80, and \$120 per barrel; the annual rate is scaled inversely to $R(P)$ and anchored to the median Brent price rate at \$80/barrel:

$$\delta(P) = \delta_A \cdot \frac{R(\$80)}{R(P)} \quad (A6a)$$

$$B(k) = q_0 \cdot g_P^k, \quad g_P = (1 - \delta(P))^{1/12} \quad (A6b)$$

where k indexes projection months ($k = 1$ is June 2026). Resulting annual declines under different price scenarios are 6.82% (\$40/barrel), 6.14% (\$80/barrel), and 5.58% (\$120/barrel).

A.5 Well-stimulation (fracking) scenario

Sixteen existing wells are stimulated per the DPP Update schedule (Table 2.7-1): three campaigns of 6, 6, and 4 wells (within the permit cap of six wells per year), totaling 38 frac-pack stages and 19 secondary gravel packs. Cohorts step online at the modeled mid-campaign month:

DPP campaign	Wells (n_c)	Frac stages	Cohort online (model)	Month (k_c)	CapEx (M\$)
Jan–Oct 2028	6	14	June 2028	25	13.5
Mar–Dec 2030	6	14	June 2030	49	13.5
May 2032–Jan 2033	4	10	Sept 2032	76	9.6

Each cohort adds $n_c \times IP$ bbl/day at its online month, then declines by a segmented exponential with factor $\phi(a)$ at cohort age $a = k - k_c$ months, using monthly factors $g_j = (1 - D_j)^{1/12}$:

$$\varphi(a) = g_1^a, \quad 0 < a \leq 48 \quad (\text{A7a})$$

$$\varphi(a) = g_1^{48} \cdot g_2^{a-48}, \quad 48 < a \leq 108 \quad (\text{A7b})$$

$$\varphi(a) = g_1^{48} \cdot g_2^{60} \cdot g_3^{a-108}, \quad a > 108 \quad (\text{A7c})$$

Segment	Cohort age a (months)	Annual decline rate D	Source
Period 1 (yrs 1–4)	$0 < a \leq 48$	$D_1 = 27.0\%$	Handler et al. (2025)
Period 2 (yrs 5–9)	$48 < a \leq 108$	$D_2 = 14.2\%$	Handler et al. (2025)
Terminal (yrs 10+)	$a > 108$	$D_3 = 6.14\%$	Field decline rate (eq. A1); SPEE (2021): 4–7%

Total platform production is the declining base plus all active cohorts:

$$q(k) = B(k) + IP \cdot \sum n_c \cdot \varphi(k - k_c) \quad (\text{A8})$$

The per-well uplift IP is calibrated so that total production equals the stated peak production per the DCOR-stated maximum (~4,000 bbl/day) at the month the final cohort comes online ($k_{16} = 76$, September 2032, all 16 wells producing), in the \$80/barrel price scenario:

$$IP = \frac{4000 - B(76)}{\sum n_c \cdot \varphi(76 - k_c)} = 390.6 \text{ bbl/day} \quad (\text{A9})$$

Note that because 12 stimulated wells are online in mid-2030, the model's global maximum (~4,300 bbl/day at the June 2030 campaign) modestly exceeds the September 2032 calibration point.

A.6 Stimulation capital costs

DCOR has not publicly disclosed capital expenditures (CapEx) for the proposed fracking program. These are therefore estimated based on DPP quantities with unit costs benchmarked to Gulf of Mexico shelf frac-pack completions and offshore-adjusted per-stage service costs:

$$CapEx = [16 \cdot (1.0) + 38 \cdot (0.30) + 3 \cdot (1.5)] \cdot (1.15) = 36.7 \text{ M\$} \quad (\text{A10})$$

This suggests \$1.0M per well for downhole completion work (workover time, perforating, sand screens, packers), \$0.30M per frac-pack stage (pumping services, proppant, fluids, pro-rated gravel packs), \$1.5M fixed per campaign (mobilization, vessels, standby), plus 15% contingency of \$2.29M per well, \$0.97M per stage. CapEx is incorporated in the models above at each stated campaign month (\$13.5M, \$13.5M, \$9.6M) and reported both gross and net against undiscounted net revenue. Note that net revenue excludes fixed platform operating costs, royalties, taxes, and discounting.

A.7 Model parameter values and sources

Parameter	Value	Basis
Base rate q_0	959.6 bbl/d	Observed Jan–May 2026 average based on BSEE production data.
Cum. production C_{1993} / C_{2025}	21.06 / 42.62 MMbbl	BSEE production data
OOIP, Santa Clara field	300 MMbbl (range 280–470)	Derived: original recoverable / RF 15–25%
Proved remaining reserves (2025), Santa Clara Field	11.368668 MMbbl	BOEM remaining reserves Dec 2025
Ultimate RF, pre-stimulation	18.0% of OOIP	Calibrated: $(C_{2025} + \text{Reserves}_{2025}) / \text{OOIP}$
Ultimate RF with stimulation	21.0% (+3.0 points)	Assumption; scale-consistent with production-model uplift
f(P) anchor points	0.809 @ \$34.4; 1.0 @ \$120	Assumed schedule (Rystad max-price convention)
Platform peak (all 16 wells on)	4,000 bbl/d (Sept 2032)	DCOR DPP Update forecast
Calibrated per-well uplift IP	390.6 bbl/d	Eq. (A7), \$80 scenario
Operating expenditure (OpEx)	\$10.20/bbl	Rystad; net-revenue break-even only
Estimated fracking program capital expenditure (CapEx)	\$36.7M program total	Eq. (A10); DPP quantities + benchmarks
Brent scenarios (flat, real 2025\$)	\$40, \$80, \$120/bbl	Anticipated range of prices based on long-term averages from EIA Annual Energy Outlook 2025, max price outlook from Rystad

Appendix References

Bureau of Ocean Energy Management (BOEM) Pacific Outer Continental Shelf Region. 2026. *Field Reserve Estimate Summary as of December 2025*.

Houseworth, J. and Stringfellow, W. 2015. A Case Study of California Offshore Petroleum Production. In: Long, J., Feinstein, L., Birkholzer, J., Foxall, W., Houseworth, J., Jordan, P., et al. *An Independent Scientific Assessment of Well Stimulation in California Volume III: Case Studies of Hydraulic Fracturing and Acid Stimulations in Select Regions: Offshore, Monterey Formation, Los Angeles Basin and San Joaquin Basin*. California Council on Science and Technology. Lawrence Berkeley National Laboratory. LBNL Report #: LBNL-189401. Accessed from <https://escholarship.org/uc/item/4nn3m0bb>

DCOR, L.L.C. / Padre Associates. 2026. Platform Gilda Well Stimulation Program: Coastal Zone Management Act Consistency Analysis & Findings (January). Accessed from: https://downloads.regulations.gov/BOEM-2025-0714-0037/attachment_16.pdf

DCOR, L.L.C. / Padre Associates. 2026. Platform Gilda Well Stimulation Program: Update to Development and Production Plan and Environmental Report (January). Accessed from: <https://www.boem.gov/sites/default/files/documents/oil-gas-energy/leasing/Gilda-DPP-Jan-2026.pdf>

Furlow, W. 1998. Fracturing and gravel packing: One objective, different approaches. *Offshore Magazine*. Accessed from: <https://www.offshore-mag.com/drilling-completion/article/16756492/fracturing-and-gravel-packing-one-objective-different-approaches>

National Academies of Sciences, Engineering, and Medicine. 2019. *Offshore Well Completion and Stimulation: Using Hydraulic Fracturing and Other Technologies: Proceedings of a Workshop*. Washington, DC: The National Academies Press. Accessed from <https://doi.org/10.17226/25439>

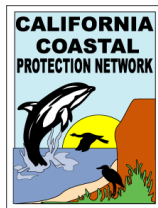
Handler, B., Bhalala, V., O'Byrne, L., and Crompton, J. 2025. *A Study of Terminal Decline Rates of Oil & Gas Wells*. Payne Institute for Public Policy, Colorado School of Mines. Accessed from <https://payneinstitute.mines.edu/a-study-of-terminal-decline-rates-of-oil-gas-wells/>

Rivas, L. F., Zeiler, C. E., Graff, B., Ogbunuju, E., and M. Parlar. 2000. *A Multi-Zone Single-Trip Gravel Packing and Production Technique Reduces Completion Costs by 60% Compared to Conventional Water-Packing in a Single-Selective Completion in the Gulf of Mexico*. Presented at the SPE International Symposium on Formation Damage Control, Lafayette, Louisiana, February 2000. Accessed from <https://doi.org/10.2118/58776-MS>

Society of Petroleum Evaluation Engineers (SPEE). 2021. *Annual Parameters Survey*. Accessed from <https://spee.org/annual-spee-parameter-survey/>



SACRED PLACES INSTITUTE
FOR INDIGENOUS PEOPLES



August 7, 2026

Meagan Harmon, Chair
California Coastal Commission
455 Market Street, Ste 300
San Francisco, CA 94105

Submitted via email to EORFC@coastal.ca.gov

**Re: DCOR Offshore Fracking Consistency Certification and Determination –
Items Th8a, 8b - OPPOSE**

Dear Chair Harmon and Commissioners,

This comment letter is submitted by the undersigned organizations to urge the California Coastal Commission (CCC) to **OBJECT** to both Consistency Certification No. CC-0001-26 and Consistency Determination No. CD-0005-26, concerning DCOR, LLC's ("DCOR") Updated Development and Production Plan ("Updated DPP" or "Project"). The Updated DPP proposes to conduct hydraulic fracturing ("fracking") from Platform Gilda, offshore Ventura County. Our organizations are committed to protecting the California coastline from the harmful effects of offshore oil and gas drilling, and we are particularly concerned about the heightened risks that fracking poses to the environment, wildlife, local communities, cultural resources and climate goals.

The Staff Reports appropriately conclude that the Project is inconsistent with the enforceable policies of the California Coastal Management Program (CCMP). Platform Gilda and its related infrastructure have been operating for 45 years—over two times their anticipated life span. Without this fracking Project, the platform would continue to decline in production and cease operations. Continuing and intensifying production on this aging infrastructure threatens the California coast with not only the risk of more oil spills, but the risk of spills of toxic fracking fluids. Accordingly, the Staff Reports correctly conclude "the proposed fracking program would materially increase the risk of a spill of crude oil and other hazardous substances by extending and intensifying the use of aging infrastructure." DCOR has not demonstrated effective containment and clean up measures in place in the event of such a spill, which gives rise to an inconsistency with Section 30232 of the Coastal Act.

As the Staff Reports point out, "DCOR's facilities have been involved in two of the three most significant offshore spill incidents in the past five years." The impacts posed by fracking at Platform Gilda, including the risk of another spill, are unacceptable.

The risk of an oil spill and other toxic substances also threatens the biological productivity of the Santa Barbara Channel region and its many sensitive species, including whales, seabirds, and fish. The discharge of produced water, which may contain fracking fluids, further threatens marine life. Offshore fracking could also impair commercial and recreational

fishing, contribute to coastal hazards, and impede public access and recreation. For these reasons, the Project is inconsistent with many policies of the CCMP.

Moreover, the Santa Barbara Channel holds cultural and spiritual significance for Chumash people and their traditions. California's ocean and coastline contain sacred sites, submerged landscapes, traditional fishing areas, and cultural resources that Chumash people have stewarded since time immemorial. The proposal for offshore fracking and prolonged drilling from Platform Gilda continues to threaten these cultural resources.

Likewise, offshore fracking increases air pollution, including smog-forming pollutants and greenhouse gases. Many chemicals emitted during fracking are also designated as hazardous air pollutants. Importantly, this fracking proposal will increase production by 14 million barrels of oil and 13 million cubic feet of gas over 20 years. This will contribute significantly to air pollution across the entire lifecycle of oil and gas production. The affected coastal region in Ventura County already violates air quality standards for smog. Additionally, fracking operations and supporting activities, such as vessel trips and high-pressure drilling, release methane and other air pollutants that contribute to smog and climate change. Furthermore, because fracking would prolong the lifespan of Platform Gilda and oil production off the California coast, these air pollution effects could continue for decades.

The goal of the Coastal Act is to "protect, maintain, and . . . restore the overall quality of the coastal zone environment." Accordingly, the Commission should use the full extent of its authority to protect the California coast from the risks of prolonged oil and gas activities on aging offshore infrastructure. In summary, we urge the Coastal Commission to stand up for California's coast and OBJECT to the consistency certification and consistency determination for offshore fracking from Platform Gilda.

Sincerely,

Center for Biological Diversity
Miyoko Sakashita, Oceans Program Director

Business Alliance for Protecting the Pacific Coast
Grant Bixby, Founding Member

Oceana
Joseph Gordon, Campaign Director

Surfrider Foundation
Jennifer Savage, California Policy Associate Director

Sierra Club California
Gabriela Facio, Senior Policy Strategist

Environmental Defense Center
Maggie Hall, Deputy Chief Counsel

Coastal Band of the Chumash Nation
Mati Waiya, Tribal Chair

Climate First: Replacing Oil and Gas (CFROG)
Haley Ehlers, Executive Director

Azul
Tomas Valadez, California Policy Manager

California Coastal Protection Network
Susan Jordan, Executive Director

The Climate Center

Woody Hastings, Phase Out Polluting Fuels
Program Director

Coastal Lands Action Network (CLAN)

Dee Fromm, Managing Director

Defend Ballona Wetlands

Marcia Hanscom, Legal Coordinator &
Community Organizer

Environment California

Laura Deehan, State Director

FutureSwell

Alex Filardo, COO

Healthy Ocean Coalition

Sarah Winter Whelan, Director

Humboldt Waterkeeper

Jennifer Kalt, Executive Director

**International Marine Mammal Project of
Earth Island Institute**

Mark J. Palmer, Associate Director

Ocean Defense Initiative

Basia Marcks, Sr. Program Director

Oil Change International

Allie Rosenbluth, US Campaigns Manager

Orange County Coastkeeper

Garry Brown, President and CEO

Paddle for Peace

Aiyana Reissman, Program Manager

Ballona Wetlands Institute

Robert J. van de Hoek, Environmental
Scientist/Marine Biologist

Sunflower Alliance

Shoshana Wechsler, Coordinator

**Physicians for Social Responsibility - Los
Angeles**

Emma Silber, Climate Justice Program
Coordinator

**CLUE-SB Environmental Justice Work
Group**

Rachel Altman, Co-chair

QUEER SURF

nic brisebois, co-Director

**Sacred Places Institute for Indigenous
Peoples**

Tina Calderon, Ocean Protectors Program
Director

Salted Roots

Adriana Guerrero-Nardone, Executive
Director

SanDiego350

Joyce Lane, Endorsement Committee
Member

**San Francisco Bay Physicians for Social
Responsibility**

Robert M. Gould, MD, President

**Santa Barbara Community Action
Network**

Harold Hill, Member

Save Our Shores

Katie Thompson, Executive Director

**Social Justice Ministry, Live Oak
Unitarian Universalist Congregation**

Carolyn Chaney, Co-chair

Society of Fearless Grandmothers-SB

Irene Cooke, Organizer

Turtle Island Restoration Network

Joanie Steinhaus, Ocean Program Director

Wishtoyo Foundation
Mati Waiya, Executive Director



SACRED PLACES INSTITUTE
FOR INDIGENOUS PEOPLES

August 7, 2026

California Coastal Commission
45 Fremont St., Suite 2000
San Francisco, CA 94105-2219
Attn: Chair Harmon

Subject: Letter of support toward staff recommendations
Agenda Item: 8a. and 8b.
Applicant: DCOR, LLC
Consistency Certification No. CC-0001-26 (Ventura County)

Dear Commissioners,

Sacred Places Institute for Indigenous Peoples (SPI) is a California Indigenous-led, grassroots environmental justice organization based in the unceded ancestral homelands of the Tongva People, also known as Los Angeles, California. Our mission is to build the capacity of Native Nations and Indigenous Peoples to protect sacred lands, waters, and cultures. Through all of our work, we support Native Nations and their ability to re-establish relationships with their ancestral homelands and waters. Our focus is on creating systems that prioritize Indigenous knowledge and protocols, grounded in intergenerational respect, reciprocity, and connection.

We at SPI thank you for your continued efforts to protect our California Coast.

SPI strongly opposes fracking and we are fully aware of the environmental harms caused by that violent practice so we were pleased that the Coastal Commission staff has recommended objecting to the consistency certification by DCOR, and the consistency determination by the Bureau of Ocean Energy Management for fracking from Platform Gilda.

Exposing our ocean relatives to the noise pollution and highly toxic chemicals which could spill into our salt waters as well as the risk of oil spills is a horrible gamble.

Sacred Places Institute for Indigenous Peoples stands with our Chumash relatives in safeguarding the lands and waters around Syuxtun, now known as Santa Barbara and the Santa Barbara channel.

Respectfully.

Tina Calderon
Ocean Protectors Program Director

From: [Joy Jacobsen](#)
To: Energy@Coastal
Subject: Public Comment on August 2026 Agenda Item Thursday 8a - Consistency Certification No. CC-0001-26 (DCOR, LLC, Offshore Ventura Co.)
Date: Thursday, July 30, 2026 2:41:36 PM

[You don't often get email from joyacjacobsen@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Dear EORFC,

Please oppose this proposal. As a Ventura City homeowner and mother, one of our most precious resources is our coastline. The beauty of our pristine waters and the fragile ecosystems that inhabit them must be preserved for this generation and the next. The proposed fracking off our coast has significant risks of seriously harming our local environment. That is why this proposal must be stopped.

Sincerely,
Joy Jacobsen
City of Ventura Resident and Mom

Sent from my iPhone

From: [Pamela Wilkinson](#)
To: Energy@Coastal
Subject: NO Offshore Fracking! (August 13 agenda item)
Date: Thursday, July 30, 2026 6:50:38 PM

You don't often get email from ppwilkinson@hotmail.com. [Learn why this is important](#)

I am writing to request that you please support the staff's recommendation and object to the consistency certification by DCOR, and the consistency determination by the Bureau of Ocean Energy Management for fracking from Platform Gilda. No fracking off the shores of California!

More about this request:

- Fracking off the coast of California was prohibited by a federal court until and unless the federal government complies with environmental laws (which has yet to occur), thanks to a lawsuit from the State of California and EDC.
- This project would extend the life of aging Platform Gilda increasing the likelihood of oil spills in one of the most ecologically significant waters in the world.
- DCOR has not demonstrated effective containment and cleanup measures in the event of a spill.
- DCOR facilities have been involved in two of the three most significant offshore spill incidents in the past five years. This is not an operator with a good record.
- Offshore fracking involves the use of highly toxic chemicals that could be spilled into the sensitive marine environment, or contaminate discharged waste water.
- Offshore fracking threatens marine life, recreation and coastal access, and commercial and recreational fishing.
- This project threatens sacred sites, submerged landscapes, traditional fishing areas, and cultural resources of the Chumash people.
- The project undermines climate goals by prolonging the production of fossil fuels.

Thank you,
Pam Wilkinson

From: [Jessica McLernon](#)
To: Energy@Coastal
Subject: NO to fracking from Platform Gilda
Date: Thursday, July 30, 2026 6:53:13 PM

You don't often get email from jessica.mclernon@gmail.com. [Learn why this is important](#)

I write this message to urge you to please support the staff's recommendation and object to the consistency certification by DCOR, and the consistency determination by the Bureau of Ocean Energy Management for fracking from Platform Gilda.

Platform Gilda's aging infrastructure threatens our local coastline and increases the likelihood of oil spills in some of the most ecologically significant waters in the world. DCOR has been involved in two very significant oil spills in the past five years and has not been effective in containment or clean up after these events.

Offshore fracking threatens our marine life, commercial fishing, enjoyment of our beautiful coastline and ocean, and undermines climate goals by prolonging the production of fossil fuels.

From: [Margot Davis](#)
To: [Energy@Coastal](#)
Subject: No fracking on platform Gilda
Date: Thursday, July 30, 2026 7:17:11 PM

[No suele recibir correo electrónico de wally97@hotmail.com. Descubra por qué esto es importante en <https://aka.ms/LearnAboutSenderIdentification>]

To whom it may concern: my name is margot davis and I am of 50 year resident of Ventura county, a senior citizen, and a homeowner. I vehemently oppose fracking on platform Gilda for all of the reasons that the environmental fence center has presented I ask you to stand up against the oil industry And protect our ocean environment. Thank you very much for your consideration margot davis 148 W. Simpson Ventura, CA 93001.
Sent from my iPhone

From: [Jean Farley](#)
To: Energy@Coastal
Subject: No Fracking!!!
Date: Thursday, July 30, 2026 7:44:46 PM

[You don't often get email from jeanfarley805@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Please note: My opposition to Fracking on our coast!!!

Sent from my iPhone

From: [Dennis Allen](#)
To: Energy@Coastal
Subject: Opposed to DCOR using platform Gilda
Date: Thursday, July 30, 2026 8:03:23 PM

You don't often get email from dallen4191@aol.com. [Learn why this is important](#)

Stop DCOR from fracking off of platform Gilda. DCOR has not complied with environmental regulations. They would be using toxic chemicals that should not be in our coastal waters. Please protect our coastal waters and help us end our dependence on fossil fuels.

Dennis Allen
320 E. Victoria St.
Santa Barbara, CA 93101

From: [Jean Farley](#)
To: [Energy@Coastal](#)
Subject: NO FRACKING FROM PLATFORM GILDA!
Date: Thursday, July 30, 2020 8:20:18 PM

You don't often get email from jeanfarley805@gmail.com. [Learn why this is important](#)

I write this message to urge you to please support the staff's recommendation and object to the consistency certification by DCOR, and the consistency determination by the Bureau of Ocean Energy Management for fracking from Platform Gilda.

Platform Gilda's aging infrastructure threatens our local coastline and increases the likelihood of oil spills in some of the most ecologically significant waters in the world. DCOR has been involved in two very significant oil spills in the past five years and has not been effective in containment or clean up after these events.

Offshore fracking threatens our marine life, commercial fishing, enjoyment of our beautiful coastline and ocean, and undermines climate goals by prolonging the production of fossil fuels.

Please save our coastline! Jean Farley, Esquire



From: [Mary Ella Holtam](#)
To: Energy@Coastal
Subject: Say No to Offshore Fracking
Date: Thursday, July 30, 2026 8:24:03 PM

You don't often get email from meholtam@gmail.com. [Learn why this is important](#)

Hello,

My name is Mary Holtam and I am a long time resident of coastal San Diego County (Encinitas) and graduate of UC Santa Barbara.

Please support the staff's recommendation and object to the consistency certification by DCOR, and the consistency determination by the Bureau of Ocean Energy Management for fracking from Platform Gilda.

Fracking off the coast of California was prohibited by a federal court until and unless the federal government complies with environmental laws (which has yet to occur), thanks to a lawsuit from the State of California and EDC.

This project would extend the life of aging Platform Gilda increasing the likelihood of oil spills in one of the most ecologically significant waters in the world. DCOR has not demonstrated effective containment and cleanup measures in the event of a spill. DCOR facilities have been involved in two of the three most significant offshore spill incidents in the past five years. This is not an operator with a good record.

Offshore fracking involves the use of highly toxic chemicals that could be spilled into the sensitive marine environment, or contaminate discharged waste water.

Offshore fracking threatens marine life, recreation and coastal access, and commercial and recreational fishing. This project threatens sacred sites, submerged landscapes, traditional fishing areas, and cultural resources of the Chumash people. The project undermines climate goals by prolonging the production of fossil fuels.

Thank you for protecting our precious coastline.

Best,
Mary

From: [Mary Turley](#)
To: Energy@Coastal
Subject: Subject: August 2026, Agenda item 8a - Consistency Certification No. CC-0001-26 (DCOR, LLC, Offshore Ventura Co.)Coastal Commission meeting Aug 13, 2026 -
Date: Thursday, July 30, 2026 8:55:18 PM

You don't often get email from sbmermaid1@gmail.com. [Learn why this is important](#)

RE: August 2026, Agenda item 8a - Consistency Certification No. CC-0001-26 (DCOR, LLC, Offshore Ventura Co.)

Dear Commissioners,

I am writing to urge the California Coastal Commission to support the staff's recommendation and object consistency certification by DCOR, and the consistency determination by the Bureau of Ocean Energy Management for fracking from Platform Gilda.

Fracking off the coast of California was prohibited by a federal court, until and unless the federal government complies with environmental laws, which has yet to occur.

This area of the Santa Barbara Channel contains coastline and marine ecosystems are which are priceless natural and economic resources. This area is one of the most ecologically sensitive waters in the world and includes Marine Protected Areas (MPAs) and National Parks. Offshore fracking threatens marine life, recreation and coastal access and commercial and recreational fishing. Offshore fracking involves the use of highly toxic chemicals that could be spilled into the sensitive marine environment, or contaminate discharged waste water.

This project would extend the life of an aging Platform Gilda, increasing the likelihood of oil spills in one of the most ecologically significant waters in the world. Additionally, DCOR has not demonstrated effective containment and cleanup plans in the event of a spill. DCOR facilities have been involved with significant offshore spills and is not an operator with a good record.

The California Coastal Act mandates the protection, preservation, and enhancement of the marine environment. Allowing high-pressure fracking operations off our shores directly violates these core protections.

I respectfully ask the Commission to take bold, decisive action to ensure that no permits for offshore fracking or related toxic discharges are allowed to threaten our beaches, our ocean, and our communities.

Thank you for your time, your public service, and your dedication to protecting California's coast.

Sincerely,

Mary Turley
907 Isleta Avenue

Santa Barbara, CA 93109
Ph (805) 636-4671

From: [Kelsey Perry](#)
To: Energy@Coastal
Subject: Object to fracking from Platform Gilda
Date: Friday, July 31, 2026 3:27:34 AM

You don't often get email from kelseyjoanneperry@gmail.com. [Learn why this is important](#)

To whom it may concern,

Please support the staff's recommendation and object to the consistency certification by DCOR, and the consistency determination by the Bureau of Ocean Energy Management for fracking from Platform Gilda.

This project would extend the life of aging Platform Gilda increasing the likelihood of oil spills in one of the most ecologically significant waters in the world.

DCOR has not demonstrated effective containment and cleanup measures in the event of a spill.

DCOR facilities have been involved in two of the three most significant offshore spill incidents in the past five years.

Offshore fracking involves the use of highly toxic chemicals that could be spilled into the sensitive marine environment, or contaminate discharged waste water.

Offshore fracking threatens marine life, recreation and coastal access, and commercial and recreational fishing.

This project threatens sacred sites, submerged landscapes, traditional fishing areas, and cultural resources of the Chumash people.

The project undermines climate goals by prolonging the production of fossil fuels.

Thank you,
Kelsey Perry
Goleta

From: [Vicky Blum](#)
To: Energy@Coastal
Subject: No Offshore Fracking
Date: Friday, July 31, 2026 11:33:44 AM

[You don't often get email from blumvicky@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

We urge the Commission to follow staff's recommendation and oppose DCOR's proposal for fracking activities from aging Platform Gilda off the Ventura coast. Fracking off the California coast was prohibited by a federal court until and unless the federal government complies with environmental laws, which it has not. DCOR has been involved in two of the three major offshore oil spills in the last five years. They haven't demonstrated effective containment and cleanup if a spill occurs.

This is the first fracking proposal off the California coast in over a decade. Fracking poses increased risks to our environment, marine life, local communities, and cultural resources. The project also undermines climate goals by prolonging the production of fossil fuels.

The Santa Barbara Channel region is one of the most ecologically rich and important regions in the world and home to endangered whales, sea turtles, sea otters and fish. We urge the Commission to use its full authority to protect the California coast from the risks of prolonged oil and gas activities.

Thanks for your consideration,

Vicky Blum and David Lebell

From: [Thomas Trappler](#)
To: Energy@Coastal
Subject: Public Comment re: DCOR and the consistency determination by the Bureau of Ocean Energy Management for fracking from Platform Gilda
Date: Friday, July 31, 2026 4:05:06 PM

You don't often get email from trappler@yahoo.com. [Learn why this is important](#)

Dear California Coastal Commission,

As a concerned citizen, I'd like to share the following comments regarding DCOR and the consistency determination by the Bureau of Ocean Energy Management for fracking from Platform Gilda

---Please support the staff's recommendation and object to the consistency certification by DCOR, and the consistency determination by the Bureau of Ocean Energy Management for fracking from Platform Gilda.

---Fracking off the coast of California was prohibited by a federal court until and unless the federal government complies with environmental laws (which has yet to occur), thanks to a lawsuit from the State of California and EDC.

---This project would extend the life of aging Platform Gilda increasing the likelihood of oil spills in one of the most ecologically significant waters in the world.

---DCOR has not demonstrated effective containment and cleanup measures in the event of a spill.

---DCOR facilities have been involved in two of the three most significant offshore spill incidents in the past five years. This is not an operator with a good record.

---Offshore fracking involves the use of highly toxic chemicals that could be spilled into the sensitive marine environment, or contaminate discharged waste water.

---Offshore fracking threatens marine life, recreation and coastal access, and commercial and recreational fishing.

---This project threatens sacred sites, submerged landscapes, traditional fishing areas, and cultural resources of the Chumash people.

---The project undermines climate goals by prolonging the production of fossil fuels.

Thank you for your time and attention,
Thomas Trappler

From: [John Sherwood](#)
To: Energy@Coastal
Subject: Public Comment on August 2026 Agenda Item Thursday 8a - Consistency Certification No. CC-0001-26 (DCOR, LLC, Offshore Ventura Co.)
Date: Friday, July 31, 2026 7:16:29 PM

[You don't often get email from jsherwd@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

I, too, object to fracking offshore of Santa Barbara.

John Sherwood
633 Greenleaf Canyon Road
Topanga, CA 90290
310/455-2771

From: [Michael Shapiro](mailto:Michael.Shapiro@CoastalEnergy.com)
To: [Energy@Coastal](mailto:Energy@CoastalEnergy.com)
Subject: VOTE "NO" ON FRACKING FROM PLATFORM GILDA
Date: Saturday, August 1, 2026 9:24:44 AM

[You don't often get email from michael@michaeljshapiro.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Vote "NO" to allow FRACKING from Oil Platform Gilda!

Climate SCIENCE has unequivocally concluded that fossil fuels production and its use have been among the greatest contributors to GLOBAL WARMING and ADVERSE, DANGEROUS CLIMATE CHANGE.

At this very moment a strengthening EL NINO has already broken records for intensity at its early stages and it likely will spark even more wild weather as it grows. A KEY AREA OF THE PACIFIC OCEAN USED TO MEASURE THE STRENGTH OF THE EL. NINO this past week has reached its warmest and most intense level ever recorded.

According to the climate scientists— the wild fires that we're seeing in Spain, France and parts of Canada and the U.S. is only "a warm-up act" and seriously — no pun intended.

Approving fracking from any new offshore or on-shore oil well source is an outrageous denial of the facts enumerated by some of the world's most respected climate scientists and I'm begging you to VOTE "NO" on approving and allowing any FRACKING ON PLATFORM GILDA or anywhere else on or off the West Coast of the U.S.. OUR VERY LIVES DEPEND UPON MOVING AWAY FROM FOSSIL FUELS TOWARDS ALL FORMS OF ALTERNATIVE ENERGY SOURCES IF WE ARE TO SAVE THE PLANET FOR OUR CHILDREN, GRANDCHILDREN AND GENERATIONS TO COME.

Thank you -

Michael J. Shapiro
1231 Fairview Court, Ojai, CA 93023
805-889-7105

From: [BILL WOODBRIDGE](#)
To: Energy@Coastal
Subject: August 13 meeting item 8
Date: Saturday, August 1, 2026 10:45:07 AM

You don't often get email from bill.woodbridge@verizon.net. [Learn why this is important](#)

- I object to the consistency certification by DCOR, and the consistency determination by the Bureau of Ocean Energy Management for fracking from Platform Gilda.
- Fracking off the coast of California was prohibited by a federal court until and unless the federal government complies with environmental laws (which has yet to occur), thanks to a lawsuit from the State of California and EDC.
- This project would extend the life of aging Platform Gilda increasing the likelihood of oil spills in one of the most ecologically significant waters in the world.
- DCOR has not demonstrated effective containment and cleanup measures in the event of a spill.
- DCOR facilities have been involved in two of the three most significant offshore spill incidents in the past five years. This is not an operator with a good record.
- Offshore fracking involves the use of highly toxic chemicals that could be spilled into the sensitive marine environment, or contaminate discharged waste water.
- Offshore fracking threatens marine life, recreation and coastal access, and commercial and recreational fishing.
- This project threatens sacred sites, submerged landscapes, traditional fishing areas, and cultural resources of the Chumash people.
- The project undermines climate goals by prolonging the production of fossil fuels.

Ill Woodbridge

anta Barbara

From: [Leiah Johnson](#)
To: Energy@Coastal
Subject: Public Comment on August 2026 Agenda Item Thursday 8a - Consistency Certification No. CC-0001-26 (DCOR, LLC, Offshore Ventura Co.)
Date: Saturday, August 1, 2026 8:33:18 PM

You don't often get email from johnsonleiah@gmail.com. [Learn why this is important](#)

Greetings,

My name is Leiah Johnson, I am a citizen of the U.S. and a resident of the state of California. I am urging the Coastal Commission to say NO to offshore fracking.

I support the staff's recommendation and object to the consistency certification by DCOR, and the consistency determination by the Bureau of Ocean Energy Management for fracking from Platform Gilda. Fracking off the coast of California has been prohibited by federal courts ONLY until and unless the federal government complied with environmental laws and regulations after a lawsuit from the State of California and the Environmental Defense Center. Instances of the federal government complying with environmental laws and regulations has yet to occur.

The Coastal Commission's staff report that was published on July 29, 2026 states that Platform Gilda and its associated pipelines and infrastructure are among the older operating oil platform facilities in California waters, having been in continuous use for roughly 45 years, more than twice the duration expected when originally authorized the Commission and installed in 1981" (Reference: <https://documents.coastal.ca.gov/reports/2026/8/Th8a/Th8a-8-2026-report.pdf>).

With this acknowledgement, and also previous reports on other older oil platforms, it has been show that older platforms have increased level or risk of pollution, infrastructure failures, and other issues, with DCOR having also been involved in two major offshore spill incidents, with one occurring just off of Huntington Beach on October 1, 2021. Not only was the area polluted by the toxic crude oil, it entered Talbert Marsh and other wetlands areas that were restored in 1991 after severe degradation after removal of a man-made dike allowed the wetlands to recover.

Ecologically sensitive areas such as Talbert Marsh and other associated wetlands areas, also contain endangered species such as the California Least Tern, threatened species such as the Western Snowy Plover and other sensitive species. Crude oil cannot be cleaned up in marsh and estuary habitats due to the potential of causing more damage and will take years to degrade upon reaching the substrate. This limits the habitat these species have available for nesting and migration, and further limits their ability to increase their population numbers.

The Coastal Commission also mentioned in its report, that DCOR's Oil Spill Response Plan has been shown to be "inadequate" in addressing other potential factors that can increase the likelihood of an oil spill such as "weather, currents, visibility and wave conditions." In addition, another one of DCOR's platforms caught fire in May of 2026.

I believe it is the best decision for not only the Coastal Commission, but the State of California, its citizens and the vast wildlife and ecologically important areas within that are also found in Huntington Beach, to say NO to offshore fracking.

Thank you for opening up to written comments, and have a great weekend.

Best regards,

Leiah Johnson

From: [Nancy Tobin](#)
To: Energy@Coastal
Subject: No to offshore fracking!
Date: Sunday, August 2, 2026 2:08:02 PM

You don't often get email from nbtobin@gmail.com. [Learn why this is important](#)

I urge the Coastal Commission to stand up for our coastline and vigorously oppose offshore fracking. This misguided proposal would risk more oil spills and toxic fracking fluids to flow into the ocean.

Thank you.

Nancy Pegues Tobin
Santa Barbara
805.698.9039

Life can only be understood backwards, but it must be lived forewords.
Kierkegaard

From: [Susan Ferguson](#)
To: Energy@Coastal
Subject: Fracking
Date: Sunday, August 2, 2026 3:00:32 PM

You don't often get email from sjferguson@cox.net. [Learn why this is important](#)

Dear Coastal Commissioners,

I am writing to strongly urge you not to approve the request from the oil companies to our President to begin fracking at platform Gilda off the Ventura coast. We must preserve the health of our ocean and prevent opportunities for fracking fluids to leak into the ocean. Please protect our coastline!

Respectfully,
Susan Ferguson

[Sent from Yahoo Mail for iPhone](#)

From: [J Kurland](#)
To: Energy@Coastal
Subject: Public Comment on August 2026 Agenda Item Thursday 8a - Consistency Certification No. CC-0001-26 (DCOR, LLC, Offshore Ventura Co.)
Date: Sunday, August 2, 2026 3:56:36 PM

You don't often get email from jjsk7@hotmail.com. [Learn why this is important](#)

Commissioners -

Fracking should ***NOT*** be allowed so close to human and marine life.

The problem is not oil shortage; the problem is over-use and wasteful consumption of gas.

Remember why the Coastal Commission was established!!

Thank you,
J. Kurland

From: [Cheryl Tomchin](#)
To: Energy@Coastal
Subject: I'm encouraging this commission to protect our coastline
Date: Monday, August 3, 2026 8:58:25 AM

You don't often get email from ctomchin@gmail.com. [Learn why this is important](#)

Please object to offshore fracking which is illegal.

The Gilda Platform has been in operation over twice its projected lifetime.

DCOR has not demonstrated effective clean-up measures and has a terrible track record.

Fracking threatens marine life, and recreational activities, as well as denigration of sacred Chumash sites.

Science now acknowledges global warming is due in part to fossil fuels.

Think of the legacy we leave future generations.

Thank you for your attention,

Cheryl Tomchin

93108

From: [Jane Fehrenbacher](#)
To: Energy@Coastal
Subject: I object to certification by DCOR and fracking off the coast of CA..which has beenbanned by federal gov.
Date: Monday, August 3, 2026 11:23:07 AM

You don't often get email from janeldy11@gmail.com. [Learn why this is important](#)

Jane Fehrenbacher

From: [Lucy Moore](#)
To: Energy@Coastal
Subject: Offshore Drilling
Date: Tuesday, August 4, 2026 2:13:25 AM

You don't often get email from lgmoorewisc@gmail.com. [Learn why this is important](#)

To the Coastal Commission,

At your next meeting, you will debate a position on the issue of offshore drilling on our coast. Please take an unequivocal stand against such activities in perpetuity. We have all witnessed what can happen when offshore exploration goes wrong. It is not worth the terrible environmental destruction that will occur. There is simply no way to completely rule out the possibility of an accident, nor to prevent the inevitable consequences.

Therefore, we must never allow it to be developed in the first place.

Thank you for your attention to this issue.

Sincerely, Lucy Moore, Pacific Grove, CA

From: [Sue Hollingsworth](#)
To: Energy@Coastal
Subject: OPPOSE Fracking, August 13 meeting
Date: Tuesday, August 4, 2026 8:02:04 AM

[You don't often get email from sue.hollingsworth.new@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

I'm a longterm resident of Santa Barbara who opposes offshore fracking in the Santa Barbara Channel. I strongly support the positions articulated by SB ChannelKeeper and the Environmental Defense Center. Please preserve environmental protections rather than allowing short-term exploitation to prevail.

I will be unable to attend the August 13 meeting in person.

Thank you.

Sue Hollingsworth
PO Box 3428
Santa Barbara, CA 93130

From: [Russ Crane](#)
To: Energy@Coastal
Subject: Fracking from Platform Hilda
Date: Tuesday, August 4, 2026 9:12:13 AM

You don't often get email from russchrista@gmail.com. [Learn why this is important](#)

Dear Commissioners,

I am a long-time local living along the Santa Barbara coastline (72 years).

I witnessed both major oil spills in our region, and was involved with the clean-up efforts.

I have serious concerns regarding more more oil activity off our coast, specifically the following points regarding fracking off of platform Hilda:

- Fracking off the coast of California was prohibited by a federal court until and unless the federal government complies with environmental laws (which has yet to occur), thanks to a lawsuit from the State of California and EDC.
- This project would extend the life of aging Platform Gilda increasing the likelihood of oil spills in one of the most ecologically significant waters in the world.
- DCOR has not demonstrated effective containment and cleanup measures in the event of a spill.
- DCOR facilities have been involved in two of the three most significant offshore spill incidents in the past five years. This is not an operator with a good record.
- Offshore fracking involves the use of highly toxic chemicals that could be spilled into the sensitive marine environment, or contaminate discharged waste water.
- Offshore fracking threatens marine life, recreation and coastal access, and commercial and recreational fishing.
- This project threatens sacred sites, submerged landscapes, traditional fishing areas, and cultural resources of the Chumash people.
- The project undermines climate goals by prolonging the production of fossil fuels.
- Please support the staff's recommendation and object to the consistency certification by DCOR, and the consistency determination by the Bureau of Ocean Energy Management for fracking from Platform Gilda.

From: [Caitlin Swalec](#)
To: Energy@Coastal
Subject: Thursday, Item 8 — Oppose Consistency Certification for Fracking at Platform Gilda
Date: Tuesday, August 4, 2026 12:59:34 PM

You don't often get email from caitlin.swalec@gmail.com. [Learn why this is important](#)

Dear Chair Hart and Members of the California Coastal Commission,

I am writing as a Santa Barbara resident, ocean swimmer, and frequent user of the Santa Barbara Channel coastline. I urge the Commission to follow its staff's recommendation and object to both DCOR's consistency certification and the Bureau of Ocean Energy Management's consistency determination for hydraulic fracturing at Platform Gilda.

The Santa Barbara Channel is one of the most ecologically significant marine environments in the world. Allowing DCOR to frack 16 existing wells would expose this sensitive ecosystem to toxic chemicals and contaminated wastewater while prolonging the operation of aging offshore oil infrastructure. It would also increase risks to marine life, water quality, coastal recreation and access, and commercial and recreational fishing.

DCOR has not demonstrated that it can effectively contain and clean up a spill. Its facilities have also been connected to two of the three most significant offshore spill incidents in the past five years. Given that history, the Commission should not accept additional risks to the Channel based on inadequate assurances about spill prevention and response.

In 2022, the Ninth Circuit prohibited offshore fracking in California until the federal government completed the required environmental review, consulted with the U.S. Fish and Wildlife Service regarding endangered species, and provided the Commission an opportunity to conduct its federal consistency review. The necessary compliance with environmental laws has not yet occurred. DCOR should not be allowed to proceed while those obligations remain unmet.

This issue is deeply personal to me. The Channel is where I swim, spend time outdoors, and find community. Its clean water and abundant marine life are irreplaceable. Extending fossil-fuel extraction from an aging platform also moves California away from its climate goals while placing the environmental risks on coastal communities and future generations.

Please protect the Santa Barbara Channel by adopting the staff recommendation and objecting to the proposed consistency certifications for offshore fracking at Platform Gilda.

Thank you for your consideration and your stewardship of California's coast.

Sincerely,

Caitlin Swalec
Santa Barbara, California

From: [Elisa Atwill](#)
To: Energy@Coastal
Subject: No Fracking from Platform Gilda
Date: Tuesday, August 4, 2026 1:43:22 PM

You don't often get email from elisaatwill@gmail.com. [Learn why this is important](#)

Please use your authority to protect the California coast and support the transitioning to renewable energy development in California.

- Please support the staff's recommendation and object to the consistency certification by DCOR, and the consistency determination by the Bureau of Ocean Energy Management for fracking from Platform Gilda.
- Fracking off the coast of California was prohibited by a federal court until and unless the federal government complies with environmental laws (which has yet to occur), thanks to a lawsuit from the State of California and EDC.
- This project would extend the life of aging Platform Gilda, increasing the likelihood of oil spills in one of the most ecologically significant waters in the world.
- DCOR has not demonstrated effective containment and cleanup measures in the event of a spill.
- DCOR facilities have been involved in two of the three most significant offshore spill incidents in the past five years. This is not an operator with a good record.
- Offshore fracking involves the use of highly toxic chemicals that could be spilled into the sensitive marine environment, or contaminate discharged waste water.
- Offshore fracking threatens marine life, recreation and coastal access, and commercial and recreational fishing.
- This project threatens sacred sites, submerged landscapes, traditional fishing areas, and cultural resources of the Chumash people.
- The project undermines climate goals by prolonging the production of fossil fuels.

--
Elisa Atwill
805 705 9075

From: [Julien Phillips](#)
To: Energy@Coastal
Subject: Review of the Proposal to Conduct Hydraulic Fracking at Platform Gilda
Date: Tuesday, August 4, 2026 6:08:40 PM

[You don't often get email from 41julien@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Dear Commissioners,

I strongly encourage you to oppose certification of the DCOR, LLC proposal. The history of oil spills in the Santa Barbara Channel underscores the danger of approving fracking in this area. The deteriorating old oil platforms heightens the danger. At a minimum, please insist on a full environmental review before giving this proposal consideration.

Sincerely yours,

Julien Phillips
1360 Hayne Road
Hillsborough, California 94010

From: [Aaron Brinkerhoff](#)
To: [Energy@Coastal](#)
Subject: Please Do EVERYTHING in your power to ban drilling on our coast forever
Date: Wednesday, August 5, 2026 7:15:33 AM

You don't often get email from aaronbrinkerhoff@gmail.com. [Learn why this is important](#)

Hi,
I'm writing to ask for all of you to please stop at nothing to prevent oil drilling on our coast.
Thank you!
Aaron Brinkerhoff
San Rafael, CA

From: [Mark Rousseau](#)
To: [Energy@Coastal](#)
Subject: Please OPPOSE fracking permit
Date: Wednesday, August 5, 2026 8:31:05 AM

You don't often get email from markrousseau.sb@gmail.com. [Learn why this is important](#)

I support the CCC staff recommendation to deny the Consistency Certification for fracking along the CA coast.

High pressure fracking on old infrastructure is a recipe for disaster - this is obvious. DCOR has a track record for oil spills including 2 of the 3 largest in the last 5 years. The SB Channel is a biologically diverse place that benefits humans by helping the economy in tourism, fishing, and recreation. All these benefits outweigh the risks, and logic dictates that this project is a terrible idea and should not move forward. It would only benefit a few oil folks.

Lastly, it does not align with the CA goals of reducing the impacts of climate change. Please stop this project before it fails - the people and life around and in the SB Channel & Islands are counting on you.

THanks,
Mark Rousseau
markrousseau.sb@gmail.com

From: [Kelsey Maloney](#)
To: Energy@Coastal
Subject: No Offshore Fracking
Date: Wednesday, August 5, 2026 11:18:39 AM

You don't often get email from kelsey@thewriteteam.net. [Learn why this is important](#)

Good morning,

I am a resident of Carpinteria, CA. I'm writing to urge you to support the staff's recommendation and object to the consistency certification by DCOR, and the consistency determination by the Bureau of Ocean Energy Management for fracking from Platform Gilda. Fracking off the coast of California was prohibited by a federal court until and unless the federal government complies with environmental laws (which has yet to occur), thanks to a lawsuit from the State of California and EDC. Please don't allow this to go forward.

Best,

--

Kelsey Maloney (she/her)
Grant Writer

From: [brandon - Dragonette Cellars](#)
To: [Energy@Coastal](#)
Subject: Public Comment: Thursday Aug 13th meeting, NO to DCOR proposal (NO Fracking offshore)
Date: Wednesday, August 5, 2026 11:28:15 AM

You don't often get email from brandon@dragonettecellars.com. [Learn why this is important](#)

Dear Members of the Coastal Commission,

I would like to voice a strong opinion urging you to support staff's recommendation and object to the consistency certification by DCOR, and the consistency determination by the Bureau of Ocean Energy Management for fracking from Platform Gilda.

This proposed project must be prevented for three key reasons:

1. First and most obvious is the tremendous environmental risk of offshore fracking. There is simply no effective way to contain the toxic chemicals used in the process.
2. Along those same lines, this project would prolong use of the already dangerously aging Platform Gilda, doubling the danger potential for future spills.
3. DCOR facilities have been involved in two of the three most significant offshore spill incidents in the past five years. This is not an operator with a good record. In addition, DCOR has not demonstrated effective containment and cleanup measures in the event of a spill.

It is essential that common sense be part of the decision making process for oil and gas production within California. Our state has tremendous potential to lead the nation in oil and gas production which both provides a domestic source for these products while also minimizing risks to the environment. I am in favor of increasing our oil and gas production at many onshore locations, where environmental safeguards can more easily be applied. However, the offshore environment amplifies the risk to an extent that it should not be pursued.

Sincerely,
Brandon Sparks-Gillis
Solvang, CA

From: [Christiane Schlumberger](#)
To: Energy@Coastal
Subject: Save Our Coast: Say NO to offshore fracking
Date: Wednesday, August 5, 2026 11:36:32 AM

You don't often get email from c.schlumberger@me.com. [Learn why this is important](#)

To the Coastal Commission:

I am writing to urge you to protect the Santa Barbara Channel from the threat of an oil spill and/or contamination from the toxic fluids that could be discharged into the ocean.

I endorse the points made by the Environmental Defense Center and urge you to support the staff's recommendation and object to the consistency certification by DCOR, and the consistency determination by the Bureau of Ocean Energy Management for fracking from Platform Gilda.

- Fracking off the coast of California was prohibited by a federal court until and unless the federal government complies with environmental laws (which has yet to occur), thanks to a lawsuit from the State of California and EDC.
- This project would extend the life of aging Platform Gilda increasing the likelihood of oil spills in one of the most ecologically significant waters in the world.
- DCOR has not demonstrated effective containment and cleanup measures in the event of a spill.
- DCOR facilities have been involved in two of the three most significant offshore spill incidents in the past five years. This is not an operator with a good record.
- Offshore fracking involves the use of highly toxic chemicals that could be spilled into the sensitive marine environment, or contaminate discharged waste water.
- Offshore fracking threatens marine life, recreation and coastal access, and commercial and recreational fishing.
- This project threatens sacred sites, submerged landscapes, traditional fishing areas, and cultural resources of the Chumash people.
- The project undermines climate goals by prolonging the production of fossil fuels.

Thank you for your consideration.

Respectfully,

Christiane Schlumberger
Santa Barbara

From: [JEAN KAPLAN](#)
To: Energy@Coastal
Subject: PLEASE READ THIS!
Date: Wednesday, August 5, 2026 1:04:09 PM

You don't often get email from jeanb.kaplan@verizon.net. [Learn why this is important](#)

- Please support the staff's recommendation and object to the consistency certification by DCOR, and the consistency determination by the Bureau of Ocean Energy Management for fracking from Platform Gilda.
 - Fracking off the coast of California was prohibited by a federal court until and unless the federal government complies with environmental laws (which has yet to occur), thanks to a lawsuit from the State of California and EDC.
 - This project would extend the life of aging Platform Gilda increasing the likelihood of oil spills in one of the most ecologically significant waters in the world.
 - DCOR has not demonstrated effective containment and cleanup measures in the event of a spill.
 - DCOR facilities have been involved in two of the three most significant offshore spill incidents in the past five years. This is not an operator with a good record.
 - Offshore fracking involves the use of highly toxic chemicals that could be spilled into the sensitive marine environment, or contaminate discharged waste water.
 - Offshore fracking threatens marine life, recreation and coastal access, and commercial and recreational fishing.
 - This project threatens sacred sites, submerged landscapes, traditional fishing areas, and cultural resources of the Chumash people.
 - The project undermines climate goals by prolonging the production of fossil fuels.
 -
 - Thank you!
 - Jean Kaplan
 - Santa Barbara resident for 51 years
- Sent from my iPhone

From: caroleannc@aol.com
To: Energy@Coastal
Subject: Fracking off the California Coast
Date: Thursday, August 6, 2026 9:51:50 AM

You don't often get email from caroleannc@aol.com. [Learn why this is important](#)

To EORFC:

I am strongly opposed to fracking off the California Coast for the following reasons:

- Please support the staff's recommendation and object to the consistency certification by DCOR, and the consistency determination by the Bureau of Ocean Energy Management for fracking from Platform Gilda.
- Fracking off the coast of California was prohibited by a federal court until and unless the federal government complies with environmental laws (which has yet to occur), thanks to a lawsuit from the State of California and EDC.
- This project would extend the life of aging Platform Gilda increasing the likelihood of oil spills in one of the most ecologically significant waters in the world.
- DCOR has not demonstrated effective containment and cleanup measures in the event of a spill.
- DCOR facilities have been involved in two of the three most significant offshore spill incidents in the past five years. This is not an operator with a good record.
- Offshore fracking involves the use of highly toxic chemicals that could be spilled into the sensitive marine environment, or contaminate discharged waste water.
- Offshore fracking threatens marine life, recreation and coastal access, and commercial and recreational fishing.
- This project threatens sacred sites, submerged landscapes, traditional fishing areas, and cultural resources of the Chumash people.
- The project undermines climate goals by prolonging the production of fossil fuels.

Thank you, Carole Ann Cole
Santa Barbara, CA resident

From: [Melissa Bower](#)
To: Energy@Coastal
Subject: Public Comment: DCOR Fracking off Platform Gilda / Meeting Aug. 13, 2026
Date: Thursday, August 6, 2026 12:32:53 PM

You don't often get email from m-bower@earthlink.net. [Learn why this is important](#)

Comments for August 13, 2026 meeting DCOR fracking:

I would like to submit this public comment in opposition to the DCOR fracking proposal off of Platform Gilda.

Offshore fracking uses toxic chemicals at risk of spilling into our sensitive offshore environment; this is unacceptable and of great concern.

We must protect our coastal resources both onshore and offshore as fracking threatens marine life, commercial and recreational fishing, recreation, public health, tourism and more.

Please support the staff's recommendation and **object to the consistency certification by DCOR, and the consistency determination by BOEM for fracking from Platform Gilda.**

We must not undermine climate goals and the health of current and future generations by allowing environmentally unsafe extractive practices in our local waters.

Thank you for your time,

Melissa Bower
Santa Barbara, CA

From: [Lee Heller](#)
To: Energy@Coastal
Subject: opposition to Platform Gilda fracking
Date: Thursday, August 6, 2026 2:35:55 PM

You don't often get email from k9krma@gmail.com. [Learn why this is important](#)

Dear Coastal Commission:

I am emailing to support the staff's recommendation that you reject the consistency certification by DCOR, and the consistency determination by the Bureau of Ocean Energy Management, for fracking from Platform Gilda.

First there is the legal issue: fracking off coastal California was prohibited by a federal court until and unless the federal government complies with environmental laws-- and that has yet to happen.

Second, this project would extend the life of an aging offshore platform, increasing the likelihood of oil spills in one of the most ecologically significant waters in the world. Remember, Platform Gilda is already twice as old as its anticipated life expectancy when first approved in 1981. The fracking plan would give Gilda an additional 20 years of viable production. That is nuts-- we've seen how aging oil infrastructure ends up failing. The idea that we would extend the life of this aging facility, AND use it to inject 500+ toxic chemicals into the seabed, is even more nuts.

What else is wrong with this proposal?

DCOR has not demonstrated effective containment and cleanup measures in the event of a spill;

DCOR has a poor operator record, with facilities that have been involved in two of the three most significant offshore spill incidents in the past five years;

Fracking in any environment introduces toxic chemicals and puts the surrounding ecosystem at risk, threatening marine life and coastal resources, including recreation and fishing. Offshore fracking involves the use of highly toxic chemicals that could be spilled into the sensitive marine environment, or contaminate discharged wastewater;

The project undermines climate goals by prolonging the production of fossil fuels.

As a 30 year resident of this area, I value our coastline and the health of the marine ecosystem. It provides food; jobs in fishing, tourism, and recreation; and supports a complex ecosystem. The idea that fracking in that environment would be allowed is shocking and utterly unacceptable.

Thank you for your consideration.

Sincerely,

Lee E. Heller, Ph.D., J.D.
Santa Barbara CA

From: [Darren Carter](#)
To: Energy@Coastal
Subject: New Fracking @ Platform Gilda in the SB Channel
Date: Thursday, August 6, 2026 2:40:49 PM

You don't often get email from darrenncarter@gmail.com. [Learn why this is important](#)

To whom it may concern,

I urge the Commission to support the staff's recommendation and object to DCOR's consistency certification and the Bureau of Ocean Energy Management's consistency determination for the proposed fracking project at Platform Gilda.

As someone who spends time in the ocean and along California's coast, this issue is deeply personal to me. My family and I rely on these waters for recreation, and my kids are growing up swimming, playing, and exploring the same coastline that generations before us have enjoyed. I want them to inherit an ocean that is healthy, resilient, and protected—not one that is increasingly put at risk by aging oil infrastructure and expanded offshore drilling.

Fracking off the California coast was prohibited by a federal court unless and until the federal government complies with applicable environmental laws, and that compliance has not yet occurred. Moving forward with this project despite those unresolved issues would be premature.

This proposal would extend the life of Platform Gilda by approximately 20 years, even though the platform is already roughly twice as old as the life expectancy anticipated when it was approved in 1981. Extending the life of aging offshore infrastructure only increases the risk of equipment failures and oil spills in one of the world's most ecologically significant marine environments.

DCOR has not demonstrated that it can effectively contain and clean up a major offshore spill. Its facilities have also been involved in two of the three most significant offshore oil spill incidents in the past five years. That record does not inspire confidence that this project can be carried out safely.

Offshore fracking uses highly toxic chemicals that could be released into the marine environment through spills or contaminated wastewater. Those risks threaten marine life, water quality, commercial and recreational fishing, public access to our coast, and the places where families like mine spend time together. This project would also undermine California's climate goals by prolonging fossil fuel production rather than investing in a cleaner future.

It is time to put these outdated technologies behind us and move forward.

We cannot continue risking our oceans, marine ecosystems, coastal communities, and the places we love simply to extend the life of aging oil platforms. California has worked hard to lead on environmental protection and climate action, and approving this project would move us in the wrong direction.

Commercial interests should not outweigh the long-term health of our coast, especially when the operator has already demonstrated a troubling safety record. The cost of another spill would be borne by the public, by wildlife, by coastal businesses, and by future generations—not just by the company seeking to profit from extending production.

For my family, for my children, and for everyone who depends on a clean and thriving ocean, I respectfully ask you to support the staff's recommendation and reject the proposed consistency certification and consistency determination for the Platform Gilda fracking project.

Thank you,

Darren Carter

From: [Giovanna Morelli](#)
To: Energy@Coastal
Subject: Public Comment on August 2026 Agenda Item Thursday 8a - Consistency Certification No. CC-0001-26 (DCOR, LLC, Offshore Ventura Co.)
Date: Thursday, August 6, 2026 2:59:56 PM

You don't often get email from giovanna.morelli@encompasscs.org. [Learn why this is important](#)

Dear Commissioners,

First I want to acknowledge the commission for its record of protecting our coast for residents, visitors and future generations. We need you to continue your long standing record of objecting to projects when there is a documented harm.

Cerification of Platform Gilda is a harm from which our coastal lands and marine life may never recover. Platform Gilda has reached the end of its expected lifespan and fracking would extend the use of dangerously old equipment, putting our coast at risk of a major oil spill and certainly cause deadly consequences for wildlife and workers. Of course, the community of Oxnard would get the brunt of contamination, making this a social justice issue as much as an environmental concern.

Please continue to stand up for the people, ocean and marine life of California.

Thank you,

Giovanna Morelli

Member Invisible Santa Cruz County

Environmental Issues Team

Notice to recipient: This communication is intended for the person(s) to whom it is addressed and may contain information that is protected by Federal and/or State law. If you receive this in error, any review, use, dissemination, distribution, or reproduction is strictly prohibited. Please notify us immediately by telephone or email and delete the email and any attachment from your system. Thank you for your cooperation.

From: [Ellen harvey](#)
To: Energy@Coastal
Subject: Platform Gilda and fracking
Date: Thursday, August 6, 2026 3:00:25 PM

[You don't often get email from fishfood2@msn.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Hello, my name is Ellen Theresa Bougher-Harvey. I am a native California and I love California !

I taught elementary school for 35 years, I am retired now. On behalf of myself, family, friends, students and future generations I beg of you to not allow any fracking on our precious, beautiful coast! Also even just as important or more important I'm speaking for all the marine and wildlife that cannot speak for themselves to protect their own habitat! It is our responsibility to maintain this planet for all species! Offshore fracking with its toxic chemicals can contaminate discharge waste to our sensitive marine environment. This area is also a sacred site to the Chumash people which we need to honor to protect their culture .

Fracking off the coast of California was prohibited by federal court until and unless the federal government complies with the environmental laws which has (yet to occur)thanks to a lawsuit by the state of California and the environmental defense center . Personally, this is very scary to me that this would even be thought of being allowed to have fracking in California. But with our President Donald Trump, it has made it very scary to me because he cares nothing about the environment only keeping his Rich oil friends happy! We have only one planet , we are watching climate change cause a lot of devastation! The DCOR has not demonstrated effective containment and cleanup measures in the event of a spill!DCOR facilities have been involved in two of the three offshores spill incidents in the past five years! I do not have faith or trust in an operation with such a poor record! Along with this poor record, this would extend the life of platform Gilda, which is already aging, and therefore will increase the likelihood of an oil spill in this amazing ecologically significant water in the whole world! Please do what's right for our coast, all the wildlife and marine environments for now and for the future of California coast! Please do not allow fracking. Please use your full authority, protect the California coast from the major risk of prolong oil and gas activities! You are my hope for now and the future ! Thank you

From: [mark frank](#)
To: [Energy@Coastal](#)
Subject: You know this is a bad idea.
Date: Thursday, August 6, 2026 3:24:35 PM

You don't often get email from markfrank@gmail.com. [Learn why this is important](#)

When has fracking ever been done in a way that doesn't damage the environment?

And you want to do it in the middle of the Santa Barbara Channel? This benefits absolutely nobody in Santa Barbara or California. Our industry is mainly tourism, and when you mess up our waters and beaches we will all suffer. I understand that the oil companies need to make a buck - but this is absolutely insane.

No way,
Sincerely, Mark Frank

--

Mark

From: [Jim Stewart](#)
To: Energy@Coastal
Subject: Public Comment on August 2026 Agenda Item Thursday 8a - Consistency Certification No. CC-0001-26 (DCOR, LLC, Offshore Ventura Co.)
Date: Thursday, August 6, 2026 3:33:50 PM

You don't often get email from drjimstewart@gmail.com. [Learn why this is important](#)

I am opposed to any fracking in CA coastal waters because of dangers of spills, ruining our beaches and killing sea life.

I also ask the commission to issue a cease-and-desist order to Sable Offshore Corp. for disobeying California law and restarting operations in the coastal zone with no coastal development permit.

Thank you for protecting us!!!
Jim Stewart

From: [Michelle Sparks-Gillis](#)
To: Energy@Coastal
Subject: Public Comment: Thursday Aug 13th meeting, NO to DCOR proposal (NO Fracking offshore)
Date: Thursday, August 6, 2026 4:07:18 PM

You don't often get email from mleesp@gmail.com. [Learn why this is important](#)

Dear Members of the Coastal Commission,

Please support staff's recommendation and object to the consistency certification by DCOR, and the consistency determination by the Bureau of Ocean Energy Management for fracking from Platform Gilda.

This proposed project must be prevented for three key reasons:

1. First and most obvious is the tremendous environmental risk of offshore fracking. Offshore fracking threatens marine life, recreation and coastal access, and commercial and recreational fishing. There is simply no effective way to contain the toxic chemicals used in the fracking process.
2. This project would prolong use of the already dangerously aging Platform Gilda, doubling the danger for potential future spills.
3. DCOR facilities have been involved in two of the three most significant offshore spill incidents in the past five years. This is not an operator with a good record. In addition, DCOR has not demonstrated effective containment and cleanup measures in the event of a spill.

Common sense must be part of the decision making process for oil and gas production within California. Our state has tremendous potential to lead the nation in oil and gas production which both provides a domestic source for these products while also minimizing risks to the environment. I am in favor of increasing our oil and gas production from our onshore locations, where environmental safeguards can more easily be applied. However, the offshore environmental risks are far too great and should not be pursued.

Sincerely,
Michelle Sparks-Gillis
Solvang, CA

From: [Toluallii Nielsen](#)
To: Energy@Coastal
Subject: Public Comment on August 2026 Agenda Item Thursday 8b - Consistency Determination No. CD-0005-26 (Bureau of Ocean Energy Management)
Date: Thursday, August 6, 2026 7:57:56 PM

You don't often get email from tolualliiin@gmail.com. [Learn why this is important](#)

Dear Chair and Commissioners,

I am writing in opposition to Consistency Certification CC-0001-26 and urge the Commission to follow staff's recommendation and object to DCOR's proposal to conduct hydraulic fracturing at 16 existing wells on Platform Gilda.

I am particularly concerned that this proposal would substantially increase production using infrastructure that has already been operating for approximately 45 years. As described in the Commission staff report, the project would increase oil production from roughly 1,100 barrels per day to approximately 4,000 barrels per day, placing significantly greater throughput and additional high-pressure operations on an aging platform, wells, and seafloor pipelines.

The staff report's findings regarding spill risk are especially concerning. The Commission's responsibility should be to protect California's coastal resources by reducing foreseeable risks, not increasing them. Staff concluded that the proposed project would increase both the likelihood and potential severity of an oil spill, while DCOR has not demonstrated that its proposed response measures could provide effective containment and cleanup under conditions in the Santa Barbara Channel.

These waters support extraordinary biological resources, productive fishing grounds, recreation, and coastal communities that could suffer lasting harm from a significant offshore spill.

I am also concerned that this proposal is not simply maintaining existing production. The environmental review anticipates that hydraulic fracturing would enable approximately 14 million additional barrels of oil to be extracted over the next 20 years, while acknowledging that without the proposed fracking, production from Platform Gilda would continue to decline and eventually cease. Extending the productive life of aging offshore infrastructure by dramatically increasing its use creates additional coastal risk that I do not believe is justified.

The Commission staff report provides a compelling record showing that this proposal is inconsistent with protections for marine resources, fisheries, public access and recreation, spill prevention and response, and coastal hazards.

I respectfully urge the Commission to vote NO on the motion to concur with CC-0001-26, thereby objecting to DCOR's consistency certification.

Thank you for considering my comments.

Sincerely,
Toluallii Nielsen
241 Oakwood St
Ventura, CA 93001

From: [Joseph McLaughlin](#)
To: [Energy@Coastal](#)
Subject: Opposed to Hydraulic fracking on Oil Platform Gilda.
Date: Thursday, August 6, 2026 8:06:36 PM

You don't often get email from jojomclaughlin@yahoo.com. [Learn why this is important](#)

I am opposed to any fracking in CA coastal waters because of dangers of spills, ruining our beaches and killing sea life. Our California coastal habitat is too fragile to risk another oil spill. More important, we need to be cutting back on fossil fuel extractions. Any oil from additional fracked well will increase carbon dioxide pollution that has already warmed our Earth too much.
No more fracking. No more drilling!

Joe McLaughlin
2400 Echo Park Ave., Los Angeles CA.

From: [Jeffrey Howerton](#)
To: Energy@Coastal
Subject: PUBLIC COMMENT ON PLATFORM GILDA
Date: Thursday, August 6, 2026 8:45:21 PM

You don't often get email from jeffrey.howerton@gmail.com. [Learn why this is important](#)

Please accept comments on the new proposal to restart GILDA and frack off the coast of ventura. It is a little long but if people read it to themselves and process it, I hope they can handle some light reading.

I have far left field issues from the traditional environmental concerns, I'd want to raise in a public comment, but I do believe it fits within it and some issues related are within the groups I describe and disclosure could educate further on any sort of environmental issues.

Hence, I request disclosure of clandestine intelligence activity from all participating parties and my concern is also personal in nature regarding conflicts of interest connected to people using me including in a so called defense for things like claiming racial discrimination, and secret societies and anything I don't know about and whether DCOR, LLC and it's proprietors the templetons and this new fracking request have any insight into this, but also other participants including those that oppose this new fracking request.

Schools are a big deal for secret societies to indicate what i mean not everyone knows about, you can look it up typing north american collegiate secret societies to get a master list with stanford suspiciously missing.

I say that because the Templetons at DCOR, LLC went to Tulane in New Orleans and might be apart of their JUGGLING CLUB. I would ask Marc McGinnes at the Environmental Defense Center a long time ago if he was the UC Berkeley law school GUN CLUB, he left but was who i first knew and I dont know Maggie Hall at the Environmental Defense Center, but seeing she did NYU for undergrad would ask if she is doing the RED DRAGON Society or another one. it sounds scary in like many of the names.

I was confused at brown university where i learned of this, they have the Pacifica House secret society and thought it was for all the various people who plant into school but i knew other people upset about it, somee tried to create their own secret society for people who went to private school over public school, this is the real drama for some people at the time. But since I just pressed send on a internet application and crossed my fingers and wasnt a govt plant, i thought not applicable for me and i got over it very quickly but should have paid more attention. the private school people are diabolical and should not be underestimated how awful they can be but they all i think miss this before from schools like Deerfield or Phillips Exeter Academy in Mass, or Francis W. Parker School in Chicago and they intended to recruit more people. it is also something they have a govt proceeding. if people know my things about me true this is one thing i underemphasize that i would know these are the people i would try to get rid of and deal with actually over the other one, however since they are claiming discrimination, or doing rehab as conservatives or rehab as jewish people, or conservative planting, something about it was disqualifying to not be eligible for brown's regular secret society. i hope sharing myself provides interesting tidbits for govt people to research that i didnt say before. It is the black table in harry potter but there are blacker silks still from this one.

However, there is a curious issue unique to environmental issues and oil drilling, that I hope is a good opportunity to just educate the people and provide legal ability to change the dynamic.

the oil Industry has their own secret societies I believe. I am not sure if it is just the Petroleum Clubs, which since DCOR, LLC is based in Dallas the Petroleum Club of Dallas might be a good possibility. These are more closely similar to gentleman's clubs which are historic social institutions that have secret societies attached similar to universities, and it is also something that has a wikipedia page. if people dumped this wikipedia page into the govt it would dramatically boost ability, it is what i would instantly do ot be the first person who says times infinity whatever you say as long as it is positive for me, not like knife yourself.

I am not apart of any of them to know the differences but historic institutions like the schools people join into some clandestine groupings, and although it isn't a franchise suddenly multiple Petroleum Clubs sprung up in each oil region independent of one another like louisiana, texas, oklahoma etc and some were in california. It is not clear what these petroleum clubs are allowed to sue internally to the government, but I just openly speculate it is modified to this what I think happens for others that they can monitor behaviors of people in govt, and since opposition to oil is often from state actors doing state acting for various purposes, they can monitor the perceptions of their industry and govt actors acting, and then i believe do things for their respectability in public. I don't know if there are then other kinds of oil related secret societies. However, learning the pros and cons of their industry and the science and risk I suspect is also a part of it and hence if there is more people could know then it fits, what if they had the cure for something but horde it to themselves.

I don't know if it is fair or if there are corollaries to OIL people like potentially the Sierra Club might have something similar. In tri counties The Environmental Defense Center i know was turned into a govt institution post 9/11 and it was easy because every person is a plant according to Linda Krop and I don't know if this is also a part of missed information. Am I high profile protected whistleblower? I am not I am not very formal but I don't think they like to say this but I am not blowing the whistle, but Linda I know knows about these racial issues and jewish stuff and infringes on me people can say this and i don't want her to say she is discriminated against bringing it up. It is something of personal interest to the area though before relative Joyce Howerton made this her sort of thing, and how the oil rights divided up and other stuff is always going on when other people i was related to before have other conflicts and I don't think they consider oil actually but I don't know but it is just a oil area for other people to always factor it.

Local entities in santa barbara county at least are like the Santa Barbara Club, University Club of Santa Barbara or women's only Little Town Club. Entertainment industry figures like actors have things like the Friars Club and believe also do similar audience measurement since most people are govt actors.

However, I have concerns with others using me for their clandestine defenses in alternative racial groups claiming discrimination and some people immigrate for these purposes aware this opportunity for racial exploitation exists like mexicans, Italians or Jewish groups who also have seperate groups and also mossad. Historically, white relatives at the Hollister Ranch in gaviota led the Los Rancheros Visitadores rides with people like Walt Disney, etc, and Portuguese who arrived in california from the azores as early settlers pre california's state hood might have open issues undisclosed to them based on being in proceedings other groups like this secret society question the different groups and why they come like jewish people, italians

but portuguese would be different information. Whatever it is, it is present and ongoing and something i think i am impacted by, other people have used race in clandestine proceedings to obtain career opportunities and also relocate and plant into Santa Barbara county.

If there is the presence of such actors, I suggest the council request access to learn of any connected security issues or purposes this project has because individual actors would not necessarily know what they are acting for. I am a part of nothing but it is weird and I know people on the commission like Meagan Harmon the chair of this board. she went to Wellesley and I don't know what kind of conspiracy with women she is a part of but she will know some details when I was so much smarter and better in the 4th grade honors program and then was taken out to be homeschooled because as a celebrity I had risks and uncertainties others didn't. I am just kidding but relative Joyce Howerton was the mayor of Lompoc, and others use it for their own benefit. I would catch up to Meagan Harmon actually is more true, i think i could if I knew she had some extra help from the govt and could start dinging her. I believe they opt to not be in my favor and competitive without any additional secret societies etc but i don't know what people do since I knew them in lompoc.

Meagan is one person I put on the spot, it is also a form of ethical disclosure, so people can know, she is apart of who will do all sorts of side stuff feeling good while involved in other stuff, but that is the thing there are loose people and groups who do this, and they set their discoveries to issues related to me and I dont know why, my guess is people use things like the civil war to get opportunities before they use other later stuff, it is all possible and so is pre revolution, but i think it is disconnected and ineffectual and all adversarial and not for me and so i would want to stop all that and force people to consolidate and finish it all up quickly and ethically which is the opposite of what they do.

Lastly, putting myself into a govt process is also just because there are these weird people who have this insider information and join these groups, it is all i learned they sometimes do odd stuff, so i am doing odd stuff for any rules that i could benefit from as a engaged citizen participating in democracy so innocently - this is the most devious i am actually - and our civil institutions in a public format and then being a person where I believe various people know who I am and situation and link to these groups and have obligations they never considered they would have to do because they counted on nefarious practices

From: [Natalie Beebe](#)
To: Energy@Coastal
Subject: PublicPublic Comment on August 2026 Agenda Item Thursday 8a - Consistency Certification No. CC-0001-26 (DCOR, LLC, Offshore Ventura Co.) Comment on August 2026 Agenda Item Thursday 8a - Consistency Certification No. CC-0001-26 (DCOR, LLC, Offshore Vent...
Date: Thursday, August 6, 2026 9:25:12 PM

You don't often get email from nataliebeebe888@gmail.com. [Learn why this is important](#)

Dear Members of the California Coastal Commission,

as a resident of Santa Cruz county and an environmental activist, I urge the Commission to object to DCOR's Consistency Certification and find that this project is **not** consistent with California's coastal policies. Allowing hydraulic fracturing from Platform Gilda would extend the life of aging offshore oil infrastructure, increasing the risk of oil spills, harm to marine wildlife, threats to public health, and damage to coastal communities and cultural resources. Federal courts have already barred offshore fracking off California following lawsuits brought by the Coastal Commission and environmental organizations. Approving this proposal would undermine those protections and California's climate goals. Please stand up for California's coast and reject this certification.

Natalie Beebe
9229 Monroe Avenue, Aptos CA
Environmental Issues Team of Indivisible Santa Cruz County

From: Rodney Boone
To: Energy@Coastal
Subject: Public Comment on August 2026 Agenda Item Thursday 8a - Consistency Certification No. CC-0001-26 (DCOR, LLC, Offshore Ventura Co.)
Date: Friday, August 7, 2026 4:54:14 AM

You don't often get email from rodneypaulboone@gmail.com. Learn why this is important
<<https://aka.ms/LearnAboutSenderIdentification>>

Dear Coastal Commissioners:

I am urging you to oppose any fracking in California's coastal waters! It poses a great danger to our coastal ecosystems due to the likelihood of spills and other disruptions. At a time when we need to swiftly transition to clean energy sources, fracking represents more of the same damaging oil and gas development that has put us in this place of rising temperatures.

In addition, please issue a cease and desist order to Sable Offshore Corp. This corporation has been a flagrant scofflaw and needs to be shut down!

Thank you,

Rodney Boone
2729 Graysby Ave,
San Pedro, CA 90732

From: [michelle cline](#)
To: Energy@Coastal
Subject: PublicPublic Comment on August 2026 Agenda Item Thursday 8a - Consistency Certification No. CC-0001-26 (DCOR, LLC, Offshore Ventura Co.)
Date: Friday, August 7, 2026 5:29:23 AM

You don't often get email from doccline@yahoo.com. [Learn why this is important](#)

I urge the Commission to object to DCOR's Consistency Certification and find that this project is **not** consistent with California's coastal policies. Allowing hydraulic fracturing from Platform Gilda would extend the life of aging offshore oil infrastructure, increasing the risk of oil spills, harm to marine wildlife, threats to public health, and damage to coastal communities and cultural resources. Federal courts have already barred offshore fracking off California following lawsuits brought by the Coastal Commission and environmental organizations. Approving this proposal would undermine those protections and California's climate goals. Please stand up for California's coast and reject this certification.

Signed,
Dr. Michelle Holmes
Felton, CA

[Sent from Yahoo Mail for iPhone](#)

From: [Rosie Dyste](#)
To: Energy@Coastal
Subject: Object to Consistency Certification for DCOR
Date: Friday, August 7, 2026 9:07:38 AM

[You don't often get email from rdyste6@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

To California Coastal Commission

I am writing to support staff's recommendation and object to the consistency certification by the oil company DCOR and the Bureau of Ocean Energy Management to allow fracking from Platform Gilda. The Santa Barbara Channel is one of the most ecologically rich and important areas in California and the world for wildlife diversity and sensitive species. It is also important economically for tourism and fishing. To allow fracking would expose these resources to the threat of an oil spill, toxic substances, and water contaminated with fracking fluids. Furthermore, fracking is prohibited off the coast of California unless the federal government complies with environmental laws, which it hasn't. This proposal would extend the life of the already aging Platform Gilda at the risk of spilling oil in one of the most ecologically significant coastal waters globally.

Please use your full authority to protect the California Coast from the risks of oil and gas activities.

Sincerely,
Rosie Dyste
2930 Paseo Tranquillo
Santa Barbaras, CA 93105

From: [Almeda](#)
To: Energy@Coastal
Subject: Don't Frack Platform Gilda!
Date: Friday, August 7, 2026 9:10:23 AM

You don't often get email from almedamcoates@gmail.com. [Learn why this is important](#)

Hi, I am Almeda Coates, a resident of Ventura CA. I have lived here all my life and have never seen such a threat to Ventura's local waters. I have a boat and drive through the Santa Barbara Channel often. The channel is home to a diverse array of marine flora and fauna. Fracking in this area would be detrimental. It is not if, but when would an oil spill occur. When a spill occurs, it can close beaches, and damage the marine ecosystem many creatures call home. But the channel is not only affected in the event of a spill, fracking leaks toxic fluids into the ocean causing even more harm. We shouldn't even have offshore drilling, let alone fracking in one of the most ecologically diverse regions in the world. Thank you for your time.

From: [Judy Farris](#)
To: [Energy@Coastal](#)
Subject: Consistency Certification for proposal by DCOR, LLC
Date: Friday, August 7, 2026 9:24:53 AM

[You don't often get email from judymfarris@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Dear Commissioners,

Please - please - object to this Certification. Our coastal waters and their plant and animal inhabitants cannot be subjected to more fracking, more oil spills, and additions to the climate crisis.

Thank you,

Judy Farris

Santa Barbara CA 93105

From: [Liam Horstick](#)
To: Energy@Coastal
Subject: Public Comment Re: Fracking from Platform Gilda
Date: Friday, August 7, 2026 11:09:22 AM

You don't often get email from lbradstick@gmail.com. [Learn why this is important](#)

hi,

My name is Liam Horstick. As a native of Oxnard, CA and current resident of Santa Barbara, I encourage support the staff's recommendation and object to the consistency certification by DCOR, and the consistency determination by the Bureau of Ocean Energy Management for fracking from Platform Gilda. Offshore fracking involves the use of highly toxic chemicals that could be spilled into the sensitive marine environment, or contaminate discharged wastewater. Offshore fracking threatens marine life, recreation and coastal access, and commercial and recreational fishing

The central coast and the Santa Barbara channel are special places, teeming with life. This is the LAST place we should be expanding oil drilling.

--

Liam Horstick
[Lbradstick@gmail.com](mailto:lbradstick@gmail.com)
805-760-3905
UC Santa Barbara | 2017

From: [LeAnn Bjelle](#)
To: Energy@Coastal
Subject: Consistency Certification by DCOR, LLC Offshore Ventura Co.
Date: Friday, August 7, 2026 11:21:18 AM

You don't often get email from bjelle46@gmail.com. [Learn why this is important](#)

I urge the Commission to object to DCOR's Consistency Certification and find that this project is **not** consistent with California's coastal policies. Platform Gilda is an aging offshore oil infrastructure with increasing the risk of oil spills, harm to marine wildlife, threats to public health, and damage to coastal communities and cultural resources. Unfortunately there have been too many oil spills off of the California coast. Federal courts have already barred offshore fracking off California following lawsuits brought by the Coastal Commission and environmental organizations. Please do not approve this proposal which would undermine those protections and California's climate goals. Please stand up for California's coast and reject this certification.

LeAnn Bjelle

From: [Shaun Wolfe](#)
To: Energy@Coastal
Subject: Fracking at Platform Gilda
Date: Friday, August 7, 2026 11:48:56 AM

You don't often get email from shaun@shaunwolfephoto.com. [Learn why this is important](#)

Hello,

I am writing in support of the staff's recommendation and object to the consistency certification by DCOR, and the consistency determination by the Bureau of Ocean Energy Management for fracking from Platform Gilda. Fracking off the coast of California was prohibited by a federal court until and unless the federal government complies with environmental laws (which has yet to occur). This project would extend the life of aging Platform Gilda increasing the likelihood of oil spills in one of the most ecologically significant waters in the world.

Platform Gilda is already twice as old as its anticipated life expectancy when first approved in 1981. The fracking plan would give Gilda an additional 20 years of viable production. DCOR has not demonstrated effective containment and cleanup measures in the event of a spill. DCOR facilities have been involved in two of the three most significant offshore spill incidents in the past five years. This is not an operator with a good record. Offshore fracking involves the use of highly toxic chemicals that could be spilled into the sensitive marine environment, or contaminate discharged wastewater. Offshore fracking threatens marine life, recreation and coastal access, and commercial and recreational fishing.

The project undermines climate goals by prolonging the production of fossil fuels.

Sincerely,

--

Shaun Wolfe (he/him)
shaunwolfephoto.com
818.439.8472

From: [Margalete Ezekiel](#)
To: Energy@Coastal
Subject: Opposition to Offshore Fracking on the California Coast
Date: Friday, August 7, 2026 12:33:30 PM

You don't often get email from maestramargalete@yahoo.com. [Learn why this is important](#)

Dear California Coastal Commission Commissioners,

I want to strongly urge you to to soundly reject the assertion by DCOR LLC that allowing them to open hydraulic fracturing (fracking) operations at 16 aging offshore oil platforms would be consistent with California's Coastal policies. Californians have repeatedly passed legislation to protect the vital but vulnerable California Coastlines. Fracking would significantly increase the risk of disastrous oil spills that would profoundly damage our delicately balanced marine ecosystems, reduce the quality of life that Californians treasure, and deeply hurt the California economy. Additionally the noise, waste produced, and heavy equipment and ship traffic of even normal operations would be harmful to a wide variety of sea life, and reduce the quality of life for local residents, as well as visitors who come to enjoy our pristine coasts from around the world. Furthermore, fracking appears to make earthquakes much more likely even in areas that have never had any significant earthquake risk before, and in our very earthquake-prone region, destabilizing our already unstable faultiness would be highly dangerous.

Please stand up and protect our beautiful and thriving coasts that generations of Californians have fought to preserve.

Thank you very much, Margalete Ezekiel, retired teacher, mom, and long-term California resident (since 1980)

From: [Tom Kunhardt](#)
To: Energy@Coastal
Subject: Public Comment on August 2026 Agenda Item Thursday 8a - Consistency Certification No. CC-0001-26 (DCOR, LLC, Offshore Ventura Co.)
Date: Friday, August 7, 2026 12:56:18 PM

You don't often get email from tkunhardt@mac.com. [Learn why this is important](#)

Dear Commissioners,

Please prevent fracking on the California coast! I am opposed to any fracking in coastal waters because of dangers of spills, ruining our beaches and killing sea life. We've been down this road before and seen the damage. Let's repeat the past!

Tom Kunhardt
Oakland CA 94602

From: [Carson Brown](#)
To: Energy@Coastal
Subject: Opposition to fracking
Date: Friday, August 7, 2026 1:27:56 PM

You don't often get email from cjbrown.124@gmail.com. [Learn why this is important](#)

dear California Coastal Commission,

I am writing as a resident of Santa Barbara. I am aware that there is an upcoming three-day hearing in Santa Cruz, to determine whether to approve a Consistency Certification for a proposal by DCOR, LLC to conduct hydraulic fracturing on 16 of its existing oil wells at Platform Gilda, off the coast west of Oxnard and south of Rincon.

I support the staff in their recommendation to object to the Consistency Certification to protect the coast from oil spills and the consequences that fracking has on our coastal and marine environments.

Best
Carson

From: [Katharine Gerhardt](#)
To: Energy@Coastal
Subject: No fracking
Date: Friday, August 7, 2026 3:01:51 PM

You don't often get email from katharinegerhardt@gmail.com. [Learn why this is important](#)

- I object the consistency certification by DCOR, and the consistency determination by the Bureau of Ocean Energy Management for fracking from Platform Gilda.
- Fracking off the coast of California was prohibited by a federal court until and unless the federal government complies with environmental laws (which has yet to occur).
- This project would extend the life of aging Platform Gilda increasing the likelihood of oil spills in one of the most ecologically significant waters in the world. Platform Gilda is already twice as old as its anticipated life expectancy when first approved in 1981. The fracking plan would give Gilda an additional 20 years of viable production.
- DCOR has not demonstrated effective containment and cleanup measures in the event of a spill. DCOR facilities have been involved in two of the three most significant offshore spill incidents in the past five years. This is not an operator with a good record.
- Offshore fracking involves the use of highly toxic chemicals that could be spilled into the sensitive marine environment, or contaminate discharged wastewater.
- Offshore fracking threatens marine life, recreation and coastal access, and commercial and recreational fishing. The project undermines climate goals by prolonging the production of fossil fuels.

This goes against all attempts to preserve our precious coast and the people and animals that depend on it for survival. This short sighted extraction is the worst of a variety of sustainable options available for creating non toxic energy for our country. This is not acceptable for the future of our coast, our children, and our planet. Do the right thing and prevent the destruction of our beautiful sacred earth.

Aloha,
Katharine Gerhardt