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8 Attorneys for Cross-Defendant  
9 AERA ENERGY LLC

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
11 COUNTY OF LOS ANGELES

14 SANTA BARBARA CHANNELKEEPER,  
15 a California non-profit corporation,  
16 Petitioner,  
17 v.  
18 STATE WATER RESOURCES CONTROL  
BOARD, etc., et al.,  
19 Respondent.

Case No. 19STCP01176  
Judge: Honorable William F. Highberger  
**INITIAL DISCLOSURES (CCP § 842)  
OF CROSS-DEFENDANT AERA  
ENERGY LLC (ERRONEOUSLY SUED  
AS AERA ENERGY, LCC)**  
**Action filed: September 19, 2014  
Trial Date: Not Set**

21 CITY OF SAN BUENAVENTURA, etc.,  
22 Cross-Complainant,  
23 v.  
24 DUNCAN ABBOTT, an individual, et al.,  
25 Cross-Defendants.

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

5 **INITIAL DISCLOSURES**

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

8 Aera Energy LLC  
9 10000 Ming Avenue  
10 Bakersfield, CA 93311

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

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

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

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

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

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

13 N/A

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

17 N/A

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

20 N/A

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

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

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

28 N/A

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

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

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

N/A

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

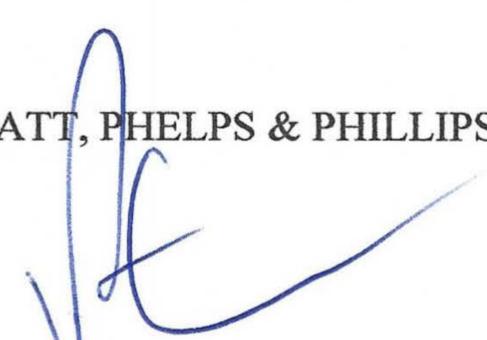
William Spear  
John Stevens  
Aera Energy LLC  
10000 Ming Avenue  
Bakersfield, CA 93311

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

N/A

Dated: May 24, 2021

MANATT, PHELPS & PHILLIPS, LLP

By:   
Peter Duchesneau  
Attorneys for Cross-Defendant  
Aera Energy LLC

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VERIFICATION

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

I am the Ventura Manager of Operations for Aera Energy Inc. I am authorized to make this verification for and on Aera Energy Inc.'s behalf, and I make this verification for that reason. I have read **INITIAL DISCLOSURES (CCP § 842) OF CROSS-DEFENDANT AERA ENERGY LLC (ERRONEOUSLY SUED AS AERA ENERGY, LCC)** and know its contents. I am informed and believe and on that ground allege that the matters stated in it are true.

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



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