



County of Fresno

DEPARTMENT OF PUBLIC WORKS AND PLANNING
STEVEN E. WHITE, DIRECTOR

DATE: February 27, 2024

TO: Department of Public Works and Planning, Attn: Steven E. White, Director
Department of Public Works and Planning, Attn: Bernard Jimenez,
Planning and Resource Management Officer
Development Services and Capital Projects, Attn: William M. Kettler,
Deputy Director of Planning
Development Services and Capital Projects, Attn: Chris Motta, Division Manager
Development Services and Capital Projects, Attn: Tawanda Mtunga,
Principal Planner
Development Services and Capital Projects, Attn: James Anders,
Principal Planner
Development Services and Capital Projects, Current/Environmental
Planning, Attn: David Randall, Senior Planner
Development Services and Capital Projects, Policy Planning, Attn:
Mohammad Khorsand, Senior Planner
Development Services and Capital Projects, Zoning & Permit Review,
Attn: Daniel Gutierrez, Senior
Planner
Development Services and Capital Projects, Building and Safety/Plan Check, Attn:
Mike Granat, Chief Building Inspector/ Arnulfo Valdivia, Supervising Building
Inspector
Development Services and Capital Projects, Development Engineering,
Attn: Laurie Kennedy, Office Assistant III
Water and Natural Resources Division, Attn: Augustine Ramirez, Division
Manager
Water and Natural Resources Division, Attn: Roy Jimenez, Senior Planner
Water and Natural Resources Division, Transportation Planning, Attn:
Hector Luna, Senior Planner
Design Division, Attn: Mohammad Alimi, Division Manager;
Erin Haagenson, Principal Staff Analyst
Resources Division, Attn: Daniel Amann, Interim Division Manger
Road Maintenance and Operations Division, Attn: Wendy Nakagawa,
Supervising Engineer
Department of Public Health, Environmental Health Division, Attn: Deep
Sidhu, Supervising Environmental Health Specialist; Kevin Tsuda,
Environmental Health Specialist;
Agricultural Commissioner, Attn: Melissa Cregan
California Department of Fish and Wildlife, Attn: R4CEQA@wildlife.ca.gov
U.S. Fish and Wildlife Service, Attn: Patricia Cole/ Matthew Nelson
Sheriff's Office, Attn: Ryan Hushaw, Assistant Sheriff, Adam Esmay, Kevin Lolkus, Lt.
Brandon Purcell
Fresno County Fire Protection District, Attn: FKU. Prevention-Planning@fire.ca.gov
City of Coalinga, Attn: Marissa Trejo, City Manager
California Highway Patrol, Attn: Captain Kevin Clays
Pleasant Valley GSA, Attn: David Khan

Pacific Gas and Electric, Centralized Review Team, Attn: PGEPlanReview@pge.com
CALTRANS, Attn: David Padilla, Division Chief/Nicholas Isla, Transportation Planner
Department of Conservation, Geologic Energy Management Division, Attn:
CalGEMinland@conservation.gov
San Joaquin Valley Unified Air Pollution Control District (PIC-CEQA Division),
Attn: PIC Supervisor
CA Regional Water Quality Control Board, Attn:
centralvalleyfresno@waterboards.ca.gov
State Water Resources Control Board, Division of Drinking Water, Attn: Cinthia Reyes
Coalinga-Huron Mosquito Abatement District, Attn: Donna Wilt
Dumna Wo Wah Tribal Government, Attn: Robert Ledger, Tribal Chairman/Eric
Smith, Cultural Resources Manager/Chris Acree, Cultural Resources Analyst
Picayune Rancheria of the Chukchansi Indians, Attn: Heather Airey/Cultural
Resources Director
Santa Rosa Rancheria Tachi Yokut Tribe, Attn: Ruben Barrios, Tribal Chairman,
Director/Shana Powers, Cultural Director
Table Mountain Rancheria, Attn: Robert Pennell, Cultural Resources Director

FROM: Jeremy Shaw, Planner
Development Services and Capital Projects Division

SUBJECT: Unclassified Conditional Use Permit No. 3782 and Initial Study No. 8545

APPLICANT: Holmes Western Oil Corporation

DUE DATE: **March 11, 2024.**

The Department of Public Works and Planning, Development Services and Capital Projects Division is reviewing the subject application proposing to allow the drilling of approximately eight (8) new oil wells on existing well pads, return existing wells to production, conversion of approximately fifteen (15) existing production wells to water injection/disposal wells, installation of new pipelines and appurtenant facilities to connect injection wells into the produced water transmission system, and ongoing maintenance of existing surface facilities, utility lines, access roads, drill pads, and pipelines, on a 627.7-acre parcel, within an established oil field, in the AL-20 (Limited Agricultural, 20-acre minimum parcel size) and the AE-40 (Exclusive Agricultural, 40-acre minimum parcel size) Zone Districts.

The subject parcel is located at the intersection of Firestone Ave. and State Route 198 (W. Elm Street), and southerly adjacent to the City of Coalinga, Section 8, Township 21 S, Range 15E. (APN: 083-020-25) (Sup. Dist. 4).

The Department is also reviewing for environmental effects, as mandated by the California Environmental Quality Act (CEQA) and for conformity with plans and policies of the County.

Based upon this review, a determination will be made regarding conditions to be imposed on the project, including necessary on-site and off-site improvements.

If you do not have comments, please provide a “NO COMMENT” response to our office by the above deadline (e-mail is acceptable; see email address below).

Please address any correspondence or questions related to environmental and/or policy/design issues to me, Jeremy Shaw, Planner, Development Services and Capital Projects Division, Fresno

County Department of Public Works and Planning, 2220 Tulare Street, Sixth Floor, Fresno, CA 93721, or call (559) 600-4207, or email jshaw@fresnocountyca.gov

JS

GG:\4360Devs&PIn\PROJSEC\PROJDOCS\CUP\3700-3799\3782 (Holmes Western Oil Corp)\Routing\CUP 3782 Routing Ltr.doc

Activity Code (Internal Review): 2384

Enclosures



Fresno County Department of Public Works and Planning

Date Received: 1-23-24 CUP 3782 (Application No.)

MAILING ADDRESS: Department of Public Works and Planning Development Services Division 2220 Tulare St., 6th Floor Fresno, Ca. 93721

LOCATION: Southwest corner of Tulare & "M" Streets, Suite A Street Level Fresno Phone: (559) 600-4497 Toll Free: 1-800-742-1011 Ext. 0-4497

APPLICATION FOR:

- Pre-Application (Type)
Amendment Application
Amendment to Text
Conditional Use Permit
Variance (Class)/Minor Variance
Site Plan Review/Occupancy Permit
No Shoot/Dog Leash Law Boundary
General Plan Amendment/Specific Plan/SP Amendment
Time Extension for
Director Review and Approval
for 2nd Residence
Determination of Merger
Agreements
ALCC/RLCC
Other

DESCRIPTION OF PROPOSED USE OR REQUEST:

CUP to allow the expansion of oil and gas exploration, drilling, and production with related facilities (Coalinga and Jacalitos Oil Fields).

CEQA DOCUMENTATION: Initial Study PER N/A

PLEASE USE FILL-IN FORM OR PRINT IN BLACK INK. Answer all questions completely. Attach required site plans, forms, statements, and deeds as specified on the Pre-Application Review. Attach Copy of Deed, including Legal Description.

LOCATION OF PROPERTY: East side of Hwy 198, and south of the City of Coalinga between and Street address: N/A

APN: 083-020-25 Parcel size: 627.55 acres Section(s)-Twp/Rg: S 8 - T 21S S/R 15E E

ADDITIONAL APN(s): Doc-1999-0105214 Grand Deed and Bill of Sale

I, Joseph M. Eller (signature), declare that I am the owner, or authorized representative of the owner, of the above described property and that the application and attached documents are in all respects true and correct to the best of my knowledge. The foregoing declaration is made under penalty of perjury.

Table with 5 columns: Name, Address, City, Zip, Phone. Rows include Owner (Holmes Western Oil Corporation - Joe Eller), Applicant (Patricia Newquist, Cornerstone), and Representative (Patricia Newquist, Cornerstone).

CONTACT EMAIL: pmn@cornerstoneeng.com

OFFICE USE ONLY (PRINT FORM ON GREEN PAPER)

Application Type / No.: UCUP 3782 Fee: \$ 9,123.00
Application Type / No.: Fee: \$
Application Type / No.: Fee: \$
Application Type / No.: Fee: \$
PER/Initial Study No.: IS 8545 Fee: \$
Ag Department Review: Fee: \$ 76.00
Health Department Review: Fee: \$ 992.00
Received By: J.S. Invoice No.: 293746 TOTAL: \$ 9,944.00

UTILITIES AVAILABLE:

WATER: Yes [] / No []
Agency:
SEWER: Yes [] / No []
Agency:

STAFF DETERMINATION: This permit is sought under Ordinance Section: Sect-Twp/Rg: - T S /R E

Related Application(s): APN #
Zone District: APN #
Parcel Size: APN #

Tax Area
2-003
77-001
77-005

33 ST.

1" = 1200'

T. 20 S.
T. 21 S.

R. 14 E.
R. 15 E.

Bk. 70
JAYNE

AVE. POLK

(19)

PLEASANT AVE.

(25)

S. MONTEREY AVE.

(27)

(24)

AVE. 5

(35) S

(22)

(16)

(1)

(46)

(20) S

(8)

(25)

(4)

(1)

(3)

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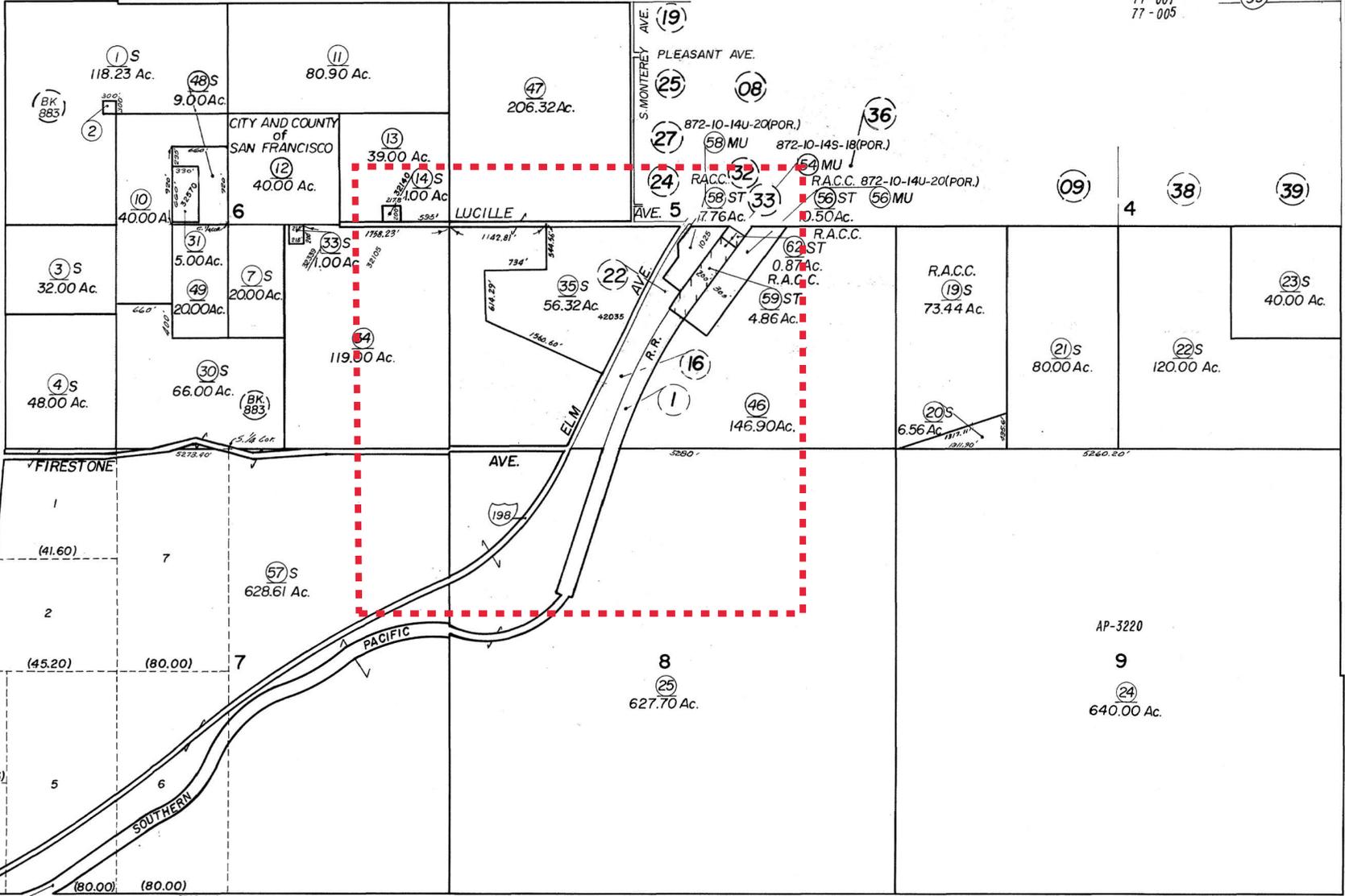
(1)

(1)

(1)

NOTE - This map is for Assessment purposes only. It is not to be construed as portraying legal ownership or divisions of land for purposes of zoning or subdivision law.

Bk. 80



(1) Agricultural Preserve

(4)

Assessor's Map Bk. 83 - Pg. 02
County of Fresno, Calif.

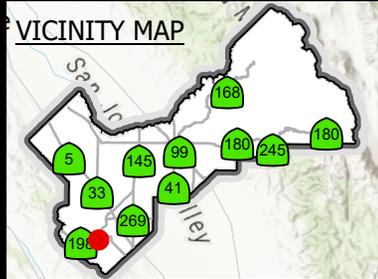
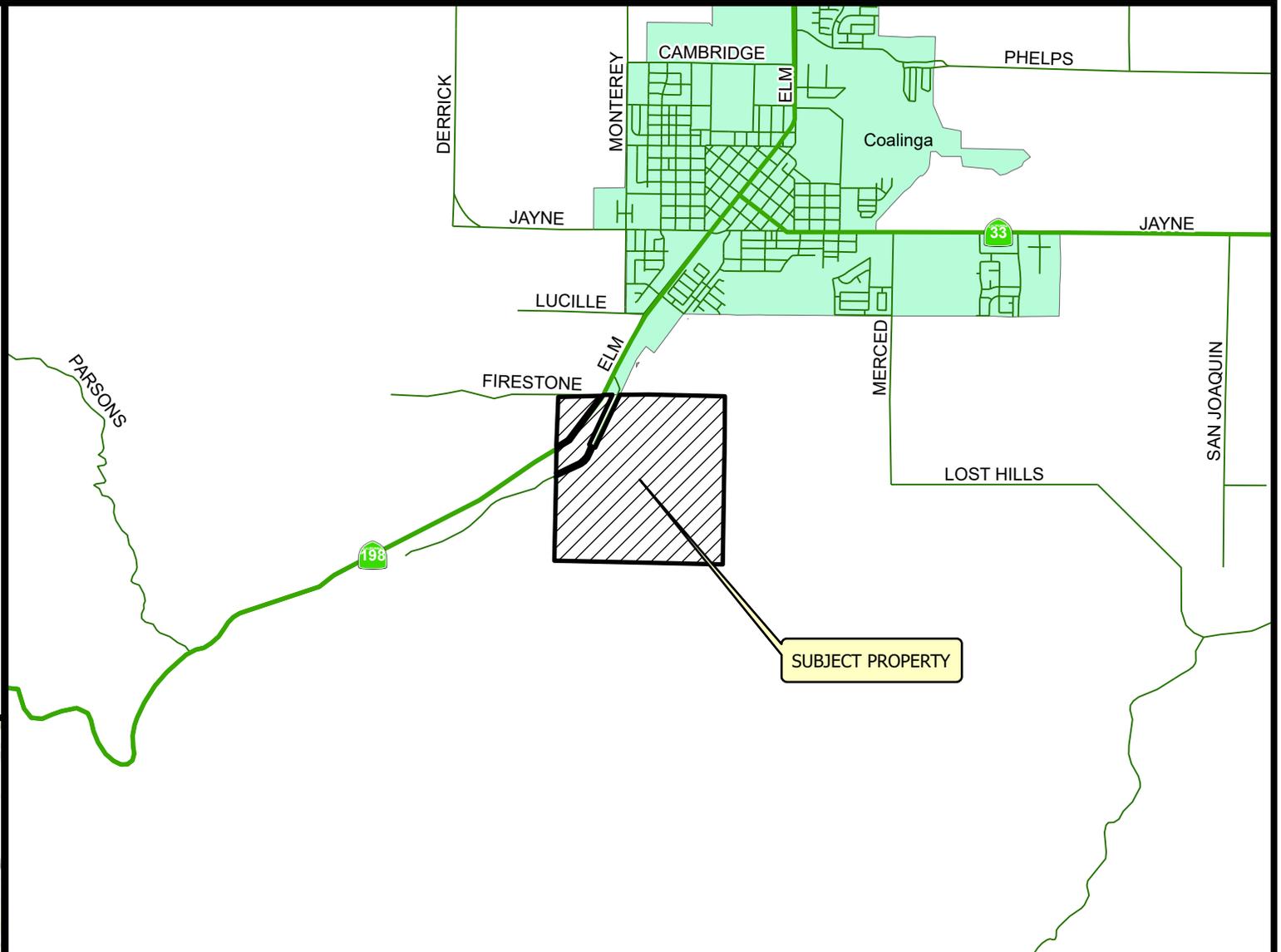
NOTE - Assessor's Block Numbers Shown in Ellipses.
Assessor's Parcel Numbers Shown in Circles.



Legend



Subject Property

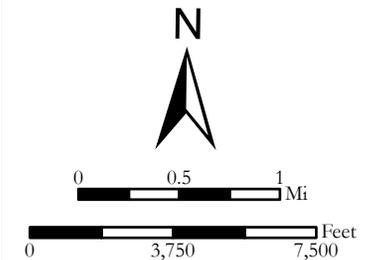


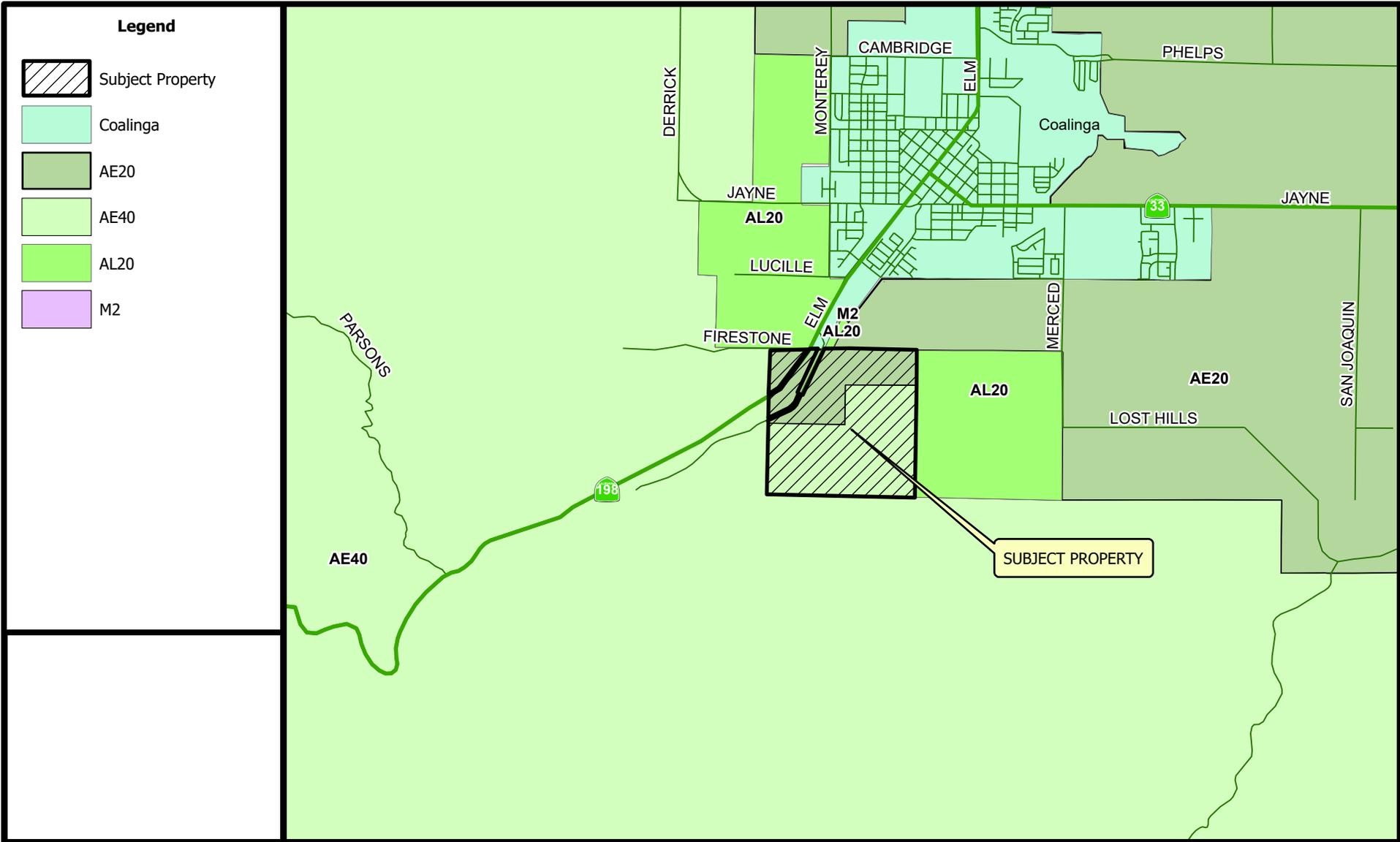
LOCATION MAP

CUP 3782 & IS 8545

2024

Prepared by : County of Fresno, Department of Public Works and Planning, Development Services Division
Person Prepared by : chuvang
On Date : 2/15/2024



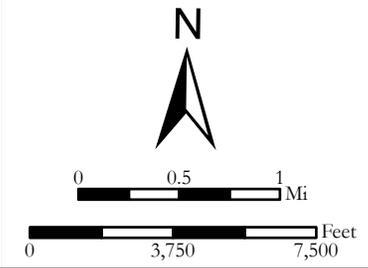


Existing Zoning Map

CUP 3782 & IS 8545
STR 8 - 21S / 15E

2024

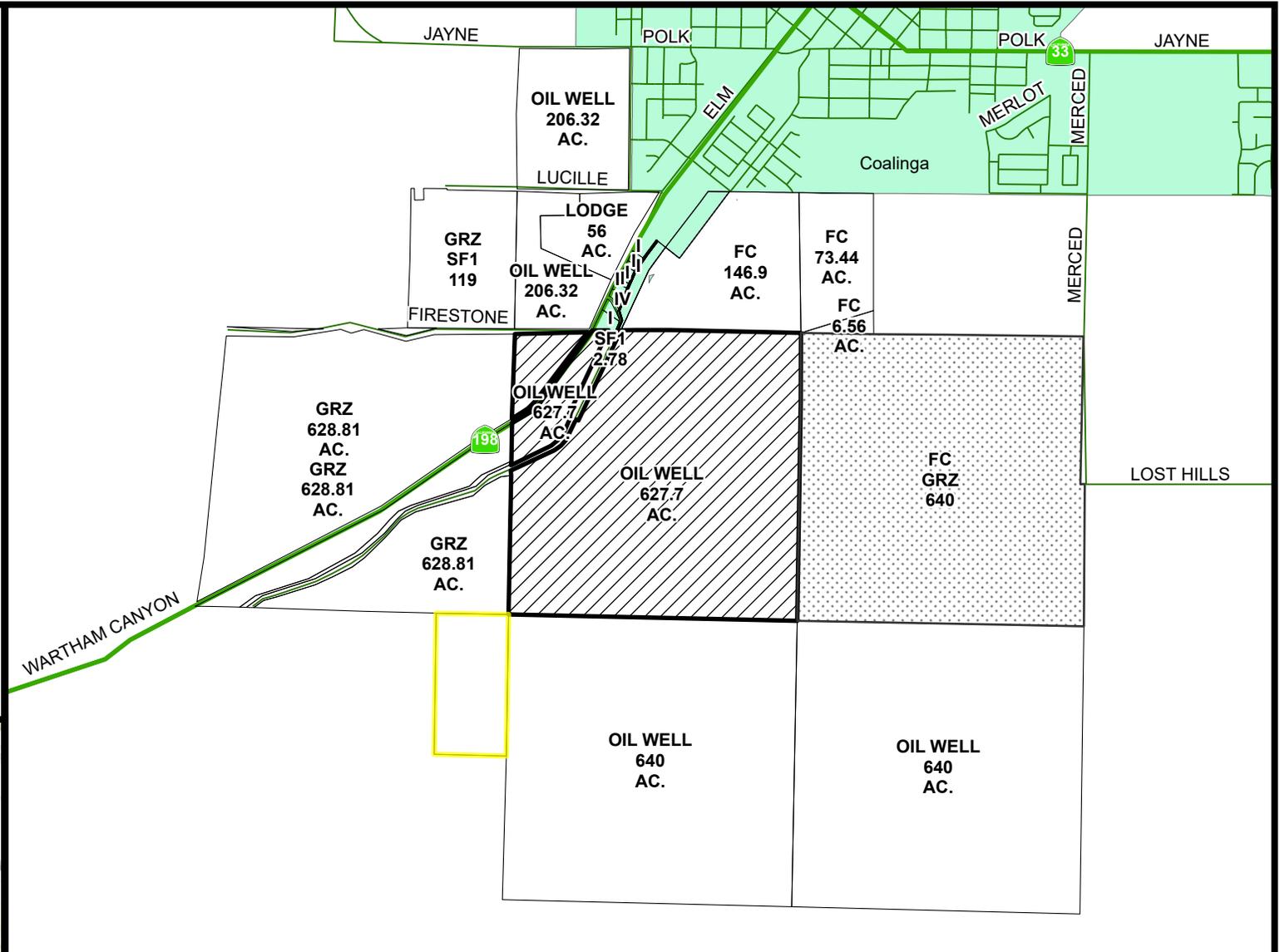
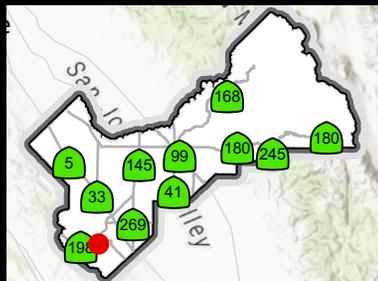
Prepared by : County of Fresno, Department of Public Works and Planning, Development Services Division
 Person Prepared by : chuang
 On Date : 2/15/2024



LEGEND:

-  Subject Property
-  Ag Contract Land

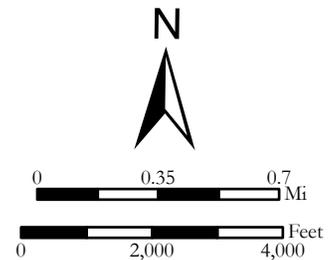
LEGEND
CP# - OFFICE COMM./PROF
FC - FIELD CROP
GRZ - GRAZING
I - INDUSTRIAL
LODGE
SF#- SINGLE FAMILY RESIDENCE
V - VACANT



Existing Land Use Map

CUP 3782 & IS 8545 | 2024

Prepared by : County of Fresno, Department of Public Works and Planning, Development Services Division
 Person Prepared by : chuang
 On Date : 2/15/2024



Holmes Western Oil Corp
Coalinga and Jacalitos Field Development Plan
Project Description

Project Name: Coalinga and Jacalitos Field Development Plan

Applicant: Holmes Western Oil Corporation

Project Proposal:

Natural resources have been produced from the Coalinga and Jacalitos Oil Fields since the late 19th and mid 20th century, respectively, and is ongoing today. Holmes Western Oil Corporation (HWOC) operates approximately 100 wells for an average total production of 300 barrels of oil daily to meet California's increasing demand for natural resources. HWOC proposes a field development plan, the goal of which is to maintain existing wells in good operating order, to maintain surface facilities with adequate capacity over the life of the field, and to drill new and replacement wells and sidetracks to sustain and/or increase production and return produced waters through underground injection.

Aspects of the proposed field development plan are illustrated in the accompanying "Preliminary Site Plan" dated 11/29/23 and include:

- Drilling of approximately 8 new oil production wells:
 - Six wells in S8, T21S, 15E MDBM in the Coalinga Field.
 - Two wells in S8, T21S, 15E MDBM in the Jacalitos Field.

New wells are to be located on existing pads such that minimal disturbance associated with grading is anticipated.

- Workover and/or sidetracking of existing wells at a pace of approximately 17 per year through the remaining life of the asset. An additional four wells per year are expected to be returned to production.
- Produced water to be handled by permitted underground injection. The conversion of fifteen existing production wells to injection wells is proposed in a current application that is under review by the state. This includes installation of new pipelines and appurtenant facilities to connect injection wells into the produced water transmission system.
- The current method of delivering marketable crude is via trucking. This delivery method is proposed to be maintained throughout the life of the asset.
- Ongoing maintenance of surface facilities, utility lines, access roads, drill pads, and pipelines as well as scheduled replacement would also occur throughout the life of the field. No new buildings or occupied structures are proposed.
- Plugging and abandonment of idle wells would also occur per HWOC's Idle Well Management Plan.

Project Location

The Project is located on approximately 627 acres of HWOC mineral leases within Coalinga and Jacalitos Fields in Fresno County, which is situated on land south of Firestone Ave and east of Highway 198. Refer to “Preliminary Site Plan” dated 11/29/23. Regional access to the Project site is provided by State Route 198. Local access is from lease roads within Section 8, in T. 21S., R15E., M.D.B.M.

The site is predominately rolling hills and is designated as Exclusive Agricultural (20- or 40-acre minimum parcel sizes). The Project site would be located within the City of Coalinga’s Area of Interest for city planning purposes (City of Coalinga General Plan 2005 -2025).

Assessor parcel numbers associated with the Project are as follows:

Assessor Parcel Number	Section / Acres
083-020-25	8 / 627.55 acres

Environmental Setting

The project site and surrounding area consist of graded pads, wells, oilfield equipment, and roadways with areas of undisturbed vegetation. Refer to the accompanying Photo Set, Section 8. The surrounding area is largely undeveloped, agricultural, or also natural resource production.

A designated waterway, Warthan Creek, passes through the project area in Section 8 such that a portion of the acreage lies within mapped Flood Zones X and AE. Much of the site consists of developed natural resource production with access roads, working pads, and existing infrastructure.

Local Agency

The Project is in an Agricultural zone in Fresno County 4th Supervisorial District southwest of the community of Coalinga, and oil and gas activities are considered compatible with the current zoning.¹ The Project resides in the State Responsibility Area for the Fire Hazard – severity moderate or high. None of the land is under a Williamson Land Contract. Section 8 is within the City of Coalinga area of interest.

Expected Crew Scheduling and Number of Employees per Shift

Day-to-day operations at the Project site are overseen by one or two operators from 7:00 am to 3:30 pm. Personnel is on-call around the clock with instrumentation for remote monitoring. Contractors may also be on-site doing work under the direction of the lease operator.

While drilling, it is expected that two shifts of contract employees will be utilized. We anticipate that the shifts will comprise seven to ten employees that take 12-hour shifts with one starting at 12 noon and the other at 12 midnight. Drilling shall operate 24 hours per day, seven days per week, while the rig is at the site.

Existing parking

During day-to-day operations, operators make their rounds in pick-up trucks such that employee parking is not applicable. Crews use designated parking areas close to work zones during times when special activities such as drilling and workovers are in progress.

¹ See letter dated July 19, 2023 from County of Fresno Dept of Public Works and Planning to Cornerstone Engineering Inc.

Outdoor Lighting / Noise / Dust / Odor

The fields are normally unmanned at night such that existing streetlights provide outdoor lighting for basic visibility. No change to that existing lighting is proposed for day-to-day operations.

During the drilling or workover activities, additional outdoor lighting is provided for OSHA compliance and safety purposes on the drilling/workover rig. While these rigs operate, this light will be on through all nighttime hours and subject to the County of Fresno lighting ordinance.

Current operations are subject to County of Fresno dust control and noise ordinance provisions. Site disturbance is minimal (i.e., less than threshold cubic yardage for grading permit) such that dust generation is minimal. Noise generated from the rig and other operations would be subject to ordinance provisions.

No odor nuisance is anticipated from activities outlined in the Project.

Drilling Operations²

Drilling of each well is anticipated to require six days, operating 24 hours per day while drilling. A drilling rig (the Ensign ADR 200 type rig or equivalent) would be used to drill and complete the wells. A production rig would install the production equipment (tubing, rods, pump) in the well after drilling is complete. This process would take approximately 12 hours or 1.5 daylight working days. Additional drilling equipment would include the following:

- fluid handling equipment
- water tank and fuel tank
- mud handling system
- mud pumps, mud logging unit, and drilling mud sump
- two 1,350 horsepower (hp) diesel generators
- one 100 hp diesel generator and power distribution skid
- blow-out prevention and spill-prevention equipment
- hydrogen sulfide detection equipment
- pipe trailer and pipe rack
- forklift, cuttings bin, catwalk, change house/tool house trailer

The drilling process would use a water-based drilling mud system. The primary components of the drilling mud are gel and water. The mud volume varies according to well depth and whether a “closed system” for drilling fluids is utilized. Approximate water consumption is 110,000 gallons per well drilled/completed; preference is given to using lease water (aka “produced water”) and additives for this purpose.

Waste materials would be properly disposed of as non-hazardous waste or hazardous waste, as appropriate. Non-hazardous waste would be collected at the Project site in a bin and trucked approximately 20 miles to the City of Avenal landfill. Hazardous waste would be managed on the well pad. If transport is required, the nearest licensed and active hazardous waste facility to the Project site is the Kettleman Hills Hazardous Waste Facility located approximately 23 miles southeast of the Project site.

Road system

No road improvements are proposed as part of the project other than ongoing routine maintenance especially after rain events. Sites are interconnected via existing private agriculture and lease access roads

² Source: Draft Initial Study/Mitigated Negative Declaration for HWOC Two New Wells at Coalinga, CA, dated July 2022 prepared by Padre Associates, Inc.

that are either paved or dirt. Existing and proposed wells have access from existing Public Roads (paved), and Private (unpaved dirt/gravel) roadways.

GENERAL NOTES

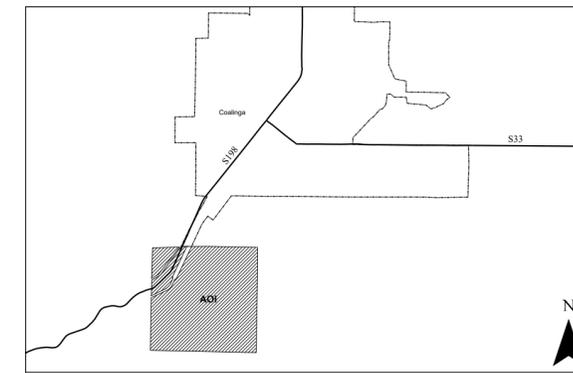
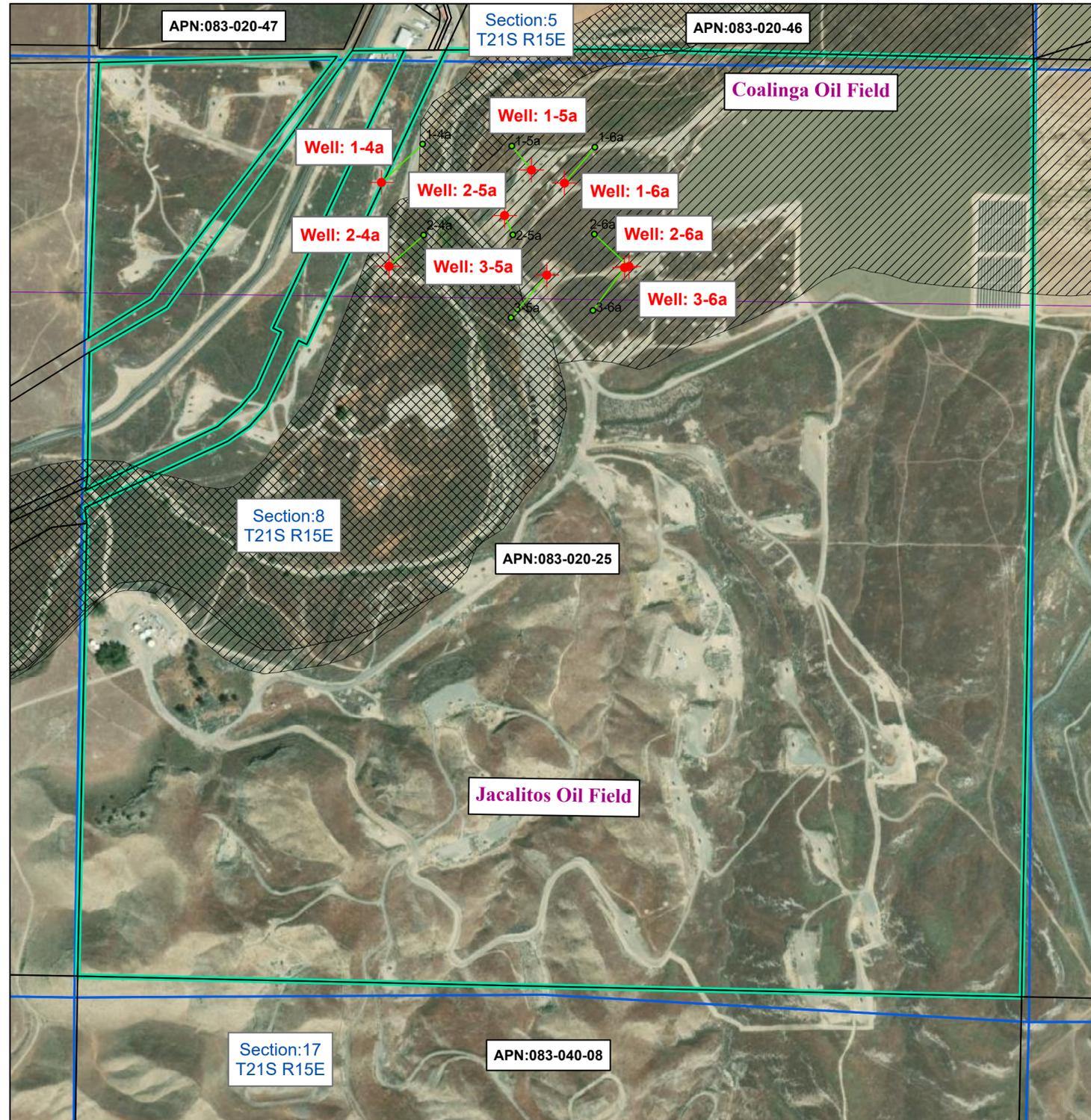
1. APN: 083-020-25
2. APPROXIMATE ACREAGE: +/- 622.46 ACRES
3. NUMBER OF LOTS: 1
4. EXISTING USE: OIL PRODUCTION
5. PROPOSED USE: OIL PRODUCTION
6. EXISTING GENERAL PLAN DESIGNATION: AGRICULTURE
7. PROPOSED GENERAL PLAN DESIGNATION: NO CHANGE
8. EXISTING ZONING: AE20 & AE40 (EXCLUSIVE AGRICULTURE)
9. PROPOSED ZONING: NO CHANGE
10. PROJECT IS WITHIN OIL DEVELOPMENT ZONE
11. PROJECT IS WITHIN LOW WATER AREA
12. FIRE PROTECTION: STATE RESPONSIBILITY AREA - MODERATE / HIGH

PRELIMINARY SITE PLAN

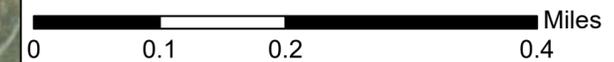
APN: 083-020-25

FLOODPLAIN DESIGNATION

ZONE X, SHADED ZONE X, & ZONE AE
 FEMA MAP NUMBER: 06019C3195H,
 06019C3360H & 06019C3380H



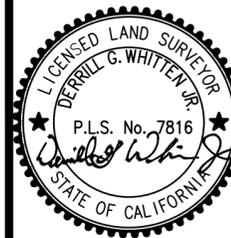
VICINITY MAP



Legend	
	Proposed Producer Well
	Proposed Bottom Hole Location
	0.2 PCT ANNUAL CHANCE FLOOD
	AE Flood Zone
	Area of Interest
	Oil & Gas Field Boundaries
	Section

SOURCE FOR PARCELS SHAPEFILE

COUNTY OF FRESNO PUBLIC WORKS AND PLANNING
<https://www.fresnocountyca.gov/Departments/Public-Works-and-Planning/divisions-of-public-works-and-planning/cds/gis-shapefiles>



CORNERSTONE ENGINEERING
 CONSULTANTS • ENGINEERS • LAND SURVEYORS
 5509 YOUNG STREET, BAKERSFIELD, CA 93311
 TEL: (661) 325-9474 FAX: (661) 322-0129
www.cornerstoneeng.com

DEVELOPMENT BY:
HOLMES WESTERN OIL CORP
 4300 MIDWAY ROAD
 TAFT, CA 93268

SITE PLAN
 COALINGA & JACALITOS OIL FIELDS

DESIGNER:	CJT
CHECKED BY:	PMN
DATE:	11/29/2023
DRAFTER:	CJT
SCALE:	AS SHOWN
COMP. NO.:	7403900_SITE
JOB NO.:	740-39-00

GENERAL NOTES

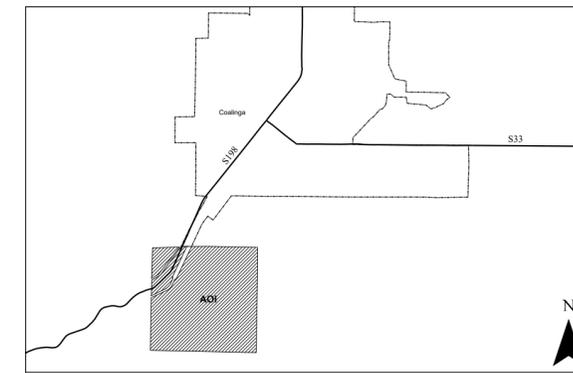
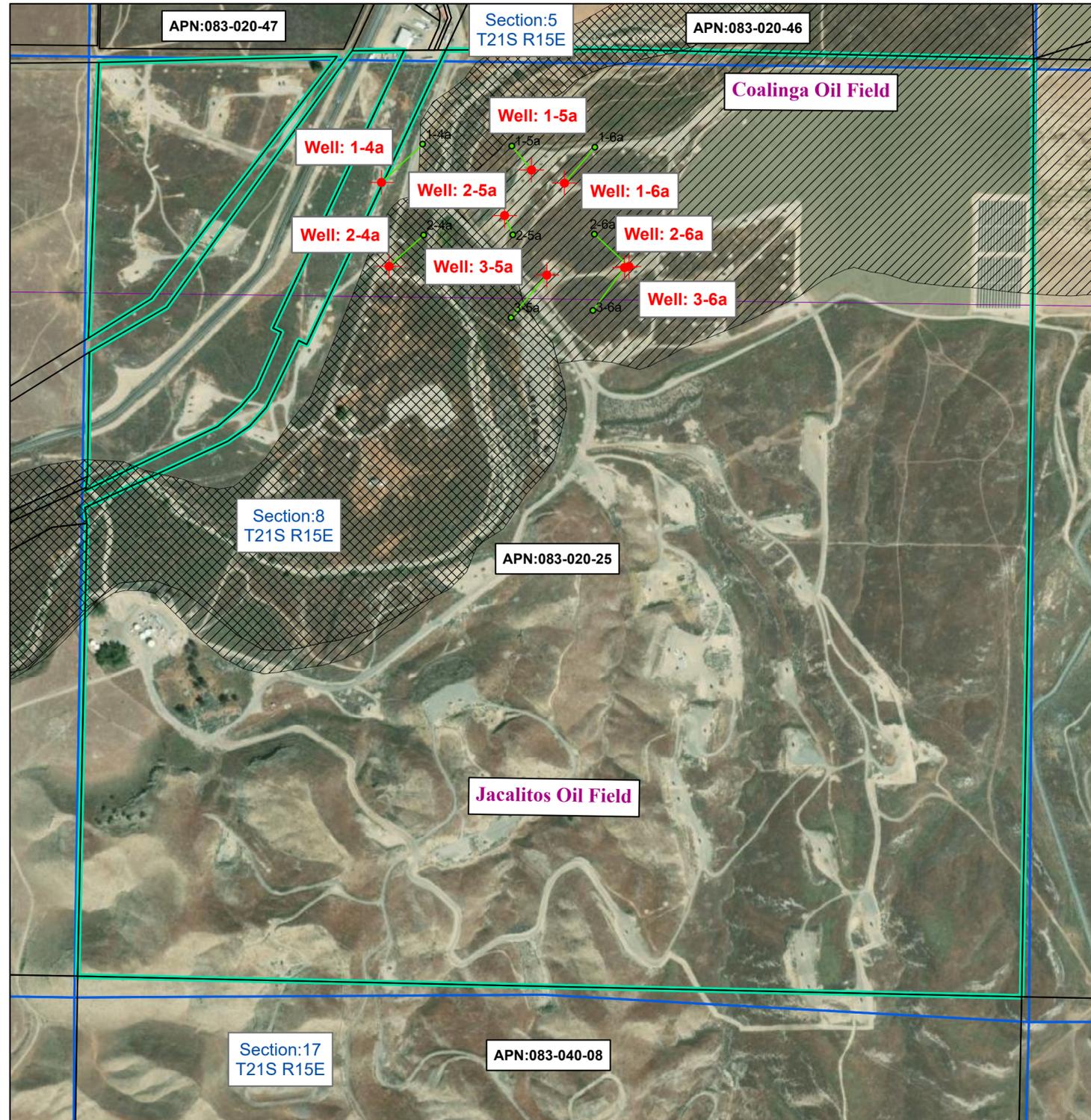
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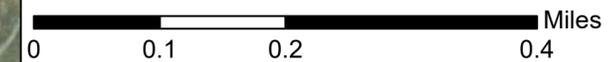
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ZONE X, SHADED ZONE X, & ZONE AE
 FEMA MAP NUMBER: 06019C3195H,
 06019C3360H & 06019C3380H



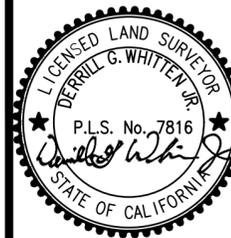
VICINITY MAP



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	AE Flood Zone
	Area of Interest
	Oil & Gas Field Boundaries
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SOURCE FOR PARCELS SHAPEFILE

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<https://www.fresnocountyca.gov/Departments/Public-Works-and-Planning/divisions-of-public-works-and-planning/cds/gis-shapefiles>



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DEVELOPMENT BY:
HOLMES WESTERN OIL CORP
 4300 MIDWAY ROAD
 TAFT, CA 93268

SITE PLAN
 COALINGA & JACALITOS
 OIL FIELDS

DESIGNER:	CJT
CHECKED BY:	PMN
DATE:	11/29/2023
DRAFTER:	CJT
SCALE:	AS SHOWN
COMP. NO.:	7403900_SITE
JOB NO.:	740-39-00

SECTION 8: PHOTO SET 1: FACING NORTH



SECTION 8: PHOTO SET 1: FACING SOUTH



SECTION 8: PHOTO SET 1: FACING EAST



SECTION 8: PHOTO SET 1: FACING WEST



SECTION 8: PHOTO SET 1: PROXIMITY OF PROPOSED WELLS TO COMMERCIAL DEVELOPMENT/PIPELINE/ROADS



SECTION 8: PHOTO SET 1: PIPELINES/ROADS



SECTION 8: PHOTO SET 2: FACING NORTH: 1-5A



SECTION 8: PHOTO SET 2: FACING SOUTH: 1-5A & PIPELINES/ROADS



SECTION 8: PHOTO SET 2: FACING EAST: 1-5A & PIPELINES/ROADS



SECTION 8: PHOTO SET 2: FACING WEST: 1-5A



SECTION 8: PHOTO SET 2: FACING NORTH: 1-6A



SECTION 8: PHOTO SET 2: FACING SOUTH: 1-6A



SECTION 8: PHOTO SET 2: FACING EAST: 1-6A & ROADS



SECTION 8: PHOTO SET 2: FACING WEST: 1-6A



SECTION 8: PHOTO SET 2: 1-6A: PIPELINES/ROADS



SECTION 8: PHOTO SET 2: 1-6A: PROXIMITY OF PROPOSED WELLS TO COMMERCIAL DEVELOPMENT



SECTION 8: PHOTO SET 3: FACING NORTH: PROXIMITY OF PROPOSED WELLS TO COMMERCIAL DEVELOPMENT



SECTION 8: PHOTO SET 3: FACING SOUTH: & PIPELINES/ROADS



SECTION 8: PHOTO SET 3: FACING EAST:



SECTION 8: PHOTO SET 3: FACING WEST:



SECTION 8: PHOTO SET 3: PIPELINES/ROADS



SECTION 8: PHOTO SET 3: FACING NORTH TOWARD COMMERCIAL URBAN AREA



SECTION 8: PHOTO SET 4: FACING NORTH & ROADS



SECTION 8: PHOTO SET 4: FACING SOUTH:



SECTION 8: PHOTO SET 4: FACING EAST:



SECTION 8: PHOTO SET 4: FACING WEST:



2

SECTION 8: PHOTO SET 4: ROADS



SECTION 8: PHOTO SET 5: FACING NORTH:



SECTION 8: PHOTO SET 5: FACING SOUTH:



SECTION 8: PHOTO SET 5: FACING EAST: & ROADS



2

SECTION 8: PHOTO SET 5: FACING WEST:



SECTION 8: PHOTO SET 5: FACING NORTH TOWARD COMMERCIAL URBAN AREA & PIPELINES



SECTION 8: PHOTO SET 6: FACING NORTH: 2-6A



SECTION 8: PHOTO SET 6: FACING SOUTH: 2-6A



SECTION 8: PHOTO SET 6: FACING EAST: 2-6A & ROADS



SECTION 8: PHOTO SET 6: FACING WEST: 2-6A



SECTION 8: PHOTO SET 6: 2-6A/3-6A: FACING NORTH TOWARD COMMERCIAL URBAN AREA



SECTION 8: PHOTO SET 6: 2-6A: ROADS



SECTION 8: PHOTO SET 6: FACING NORTH: 3-6A



SECTION 8: PHOTO SET 6: FACING SOUTH: 3-6A



SECTION 8: PHOTO SET 6: FACING EAST: 3-6A & ROADS



SECTION 8: PHOTO SET 6: FACING WEST: 3-6A

